
NORTH LONDON WASTE AUTHORITY
NORTH LONDON HEAT AND POWER
PROJECT

CONSULTATION REPORT

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

AD05.01

Arup

Revision 0 |

October 2015

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Executive summary

i.i Purpose of this report

- i.i.i This Consultation Report has been prepared in accordance with section 37(7) of the Planning Act 2008 (as amended) to support North London Waste Authority's (the Applicant's) application (the Application) to the Secretary of State for Energy and Climate Change for a Development Consent Order (DCO) pursuant to section 37 of the Planning Act 2008 (as amended).
- i.i.ii 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) capable of an electrical output of around 70 megawatts (MW_e) 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.
- i.i.iii Prior to submitting an application for a DCO, applicants have a statutory duty to consult on and publicise the proposed application in accordance with the Planning Act 2008 (as amended) and any Regulations and guidance issued pursuant to that Act.
- i.i.iv The Applicant has undertaken statutory consultation with respect to its proposed Application. The Applicant has also publicised its proposed Application in accordance with section 48 of the Planning Act 2008 (as amended).
- i.i.v This Consultation Report sets out the consultation process that has been undertaken to comply with its pre-application consultation duties, details the feedback received and explains how the feedback received has influenced the proposals in the Application for development consent.
- i.i.vi This report also provides details of the Applicant's non-statutory informal consultation with respect to the proposed Application.

i.ii Site and Project Description

- i.ii.i Established in 1986, the Applicant is a statutory authority whose principal responsibility is the disposal of waste collected by the seven north London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Constituent Boroughs).
- i.ii.ii The Applicant is the UK's second largest waste disposal authority, handling approximately 3 per cent of the total national Local Authority Collected Waste stream. Since 1994 the Applicant has managed its waste arisings predominantly through its waste management contract with LondonWaste Limited and the use of the EfW facility at the existing Edmonton EcoPark and landfill outside of London.
- i.ii.iii The Application Site, as shown on the Site Location Plans (A_0001 and A_0002 in the Book of Plans (AD02.01)), extends to approximately 22 hectares and is located wholly within the London Borough of Enfield (LB

Enfield). The Application Site comprises the existing waste management site known as the Edmonton EcoPark where the permanent facilities would be located, part of Ardra Road, land around the existing water pumping station at Ardra Road, Deephams Farm Road, part of Lee Park Way and land to the west of the River Lee Navigation, and land to the north of Advent Way and east of the River Lee Navigation (part of which would form the Temporary Laydown Area and new Lee Park Way access road). The post code for the Edmonton EcoPark is N18 3AG and the grid reference is TQ 35750 92860.

- i.ii.iv The Application Site includes all land required to deliver the Project. This includes land that would be required temporarily to facilitate the development.
- i.ii.v Both the Application Site and the Edmonton EcoPark (existing and proposed) are shown on Plans A_0001, A_0002, A_0003 and A_0004 contained within the Book of Plans (AD02.01). Throughout this report references to the Application Site refer to the proposed extent of the Project works, and Edmonton EcoPark refers to the operational site. Upon completion of the Project the operational site would consist of the Edmonton EcoPark and additional land required to provide new access arrangements and for a water pumping station adjacent to the Deephams Sewage Treatment Works outflow channel.

i.iii Overview of Consultation

- i.iii.i The requirements of the Planning Act 2008 (as amended) and associated Regulations form the framework of the pre-application consultation process undertaken by the Applicant.
- i.iii.ii A phased approach was used to provide a balance between early engagement and having proposals that are firm enough to enable consultees to comment. The pre-application consultation process took place in two phases:
 - **Phase One Consultation** ran for a period of 61 days from 28 November 2014 to 27 January 2015. This gave consultees an early opportunity to comment on the initial proposals for the Project; and
 - **Phase Two Consultation** ran for a period of 44 days, between 18 May and 30 June 2015. This phase of consultation provided more detail on proposals, including an indication of what the Edmonton EcoPark could look like, landscaping, preliminary environmental information, the cooling system, transport, management of construction, access proposals and the visitors centre.
- i.iii.iii Publicity in accordance with section 48 of the Planning Act 2008 (as amended) was undertaken in parallel to the Phase Two Consultation between 18 May 2015 and 30 June 2015 for a period of 44 days.
- i.iii.iv 'Informal' engagement i.e. engagement not forming part of either Phase One or Phase Two Consultations was also undertaken throughout the development of the Project.
- i.iii.v A chronological list of the consultation undertaken to date is provide below:

- a. informal engagement undertaken March 2014 to September 2015 with some prescribed consultees;

Statement of Community Consultation (SoCC)

- b. draft SoCC issued to LB Enfield on 14 October 2014;
- c. consultation on draft SoCC concluded on 12 November 2014;
- d. SoCC made available on the Project website on 20 November 2014;
- e. SoCC notice published in the Enfield Independent on 26 November 2014;
- f. hard copies of the SoCC made available for inspection from 26 November 2014;

Phase One Consultation

- g. advertisements placed in local press advertising Phase One Consultation between 20 November 2014 and 12 January 2015;
- h. leaflets available at community drop-off points from 20 November 2015;
- i. section 42 consultees written to and given notice of Phase One Consultation on 25 November 2014;
- j. Phase One Consultation period (section 42 and section 47) commenced on 28 November 2015;
- k. section 47 consultees issued newsletters giving notice of Phase One Consultation on 15-16 December 2014 and 6-7 January 2015;
- l. Phase One public exhibitions held on 5, 6 and 8 December 2014 and 14, 15, 17 and 22 January 2015;
- m. Phase One Consultation period (section 42 and section 47) concluded on 27 January 2015;

Phase Two Consultation

- n. section 47 consultees issued newsletters giving notice of Phase Two Consultation on 11-12 May 2015;
- o. section 48 notice published locally on 13, 12, 20 and 22 May 2015; nationally on 18 May 2015; in the London Gazette on 18 May 2015; and information made available from 13 May 2015;
- p. section 42 consultees written to and given notice of Phase Two Consultation on 15 May 2015;
- q. leaflets available at community drop-off points from 18 May 2015;
- r. advertisements placed in local press advertising Phase Two Consultation between 20 May and 30 June 2015;
- s. Phase Two exhibitions held on 3, 5, 6, 9, 10, 11, 12 and 13 June 2015; and
- t. Phase Two Consultation (section 42 and 47) concluded on 30 June 2015.

i.iv The consultation process – who was consulted and how

- i.iv.i All the bodies, organisations and individuals categorised as consultees under sections 42(1)(a), 42(1)(b), 42(1)(c), 42(1)(d) of the Planning Act 2008 (as amended) were consulted by the Applicant. They were written to at the launch of both phases of statutory consultation and provided with all the consultation materials for that phase, including a Preliminary Environmental Information Report during Phase Two Consultation, and supporting plans and documents.
- i.iv.ii All materials for both phases of consultation were drafted and issued to ensure consultees could provide informed feedback on the Applicant's proposals.
- i.iv.iii The overriding aim of the Applicant's section 47 pre-application public consultation was to ensure that the local community and other interested parties had an opportunity to understand and influence the proposals. A Statement of Community Consultation (SoCC) was produced, which sets out the approach to public consultation; primarily setting out the nature of statutory consultation at Phase One and Phase Two: outlining when, how, where and with whom consultation would be undertaken.
- i.iv.iv In developing the approach to section 47 consultation, meetings were held with LB Enfield. A draft of the SoCC was issued to LB Enfield for formal consultation and comments were incorporated in the final version of the SoCC, which was published in the public notices section of the Enfield Independent on 26 November 2014, made available on the project website, and provided at the Phase One and Phase Two Consultation exhibitions.
- i.iv.v A variety of methods were used to engage with section 47 consultees and the wider public under section 48 of the Planning Act 2008 (as amended) during both phases of consultation, as follows:
 - a. public exhibitions;
 - b. written information;
 - c. advertisements;
 - d. letters and newsletters;
 - e. community briefings; and
 - f. a Project website and telephone line.
- i.iv.vi At Phase Two Consultation, a number of additional methods were introduced, including the use of a mobile information unit, advertising in local train stations, and producing branded Oyster card holders and bookmarks.
- i.iv.vii Responses to consultation were received either as online response forms (via the website) or as offline responses (paper response forms, letters and emails).
- i.iv.viii Responses during both phases of consultation were carefully considered and taken into account in developing the Project, in accordance with section 49(2) of the Planning Act 2008 (as amended).

i.v Feedback from Phase One Consultation

i.v.i During Phase One Consultation a total of 72 responses were submitted and the Project was generally well received.

i.v.ii A number of changes to the Project were made in response to these comments. These include:

- a. respondents generally felt that the overall visual impact of the ERF should be reduced as far as possible. In response the Applicant progressed with the minimum outline design which seeks to minimise the scale and massing of the ERF;
- b. there was generally equal support for a single chimney flue and two flues. However, greater support was expressed for a design which was as visually unobtrusive as possible. This informed the decision to select a single chimney stack;
- c. respondents noted that incorporating ecological measures into the design was important and that the Project should integrate with the surrounding environment, in particular the Lee Valley Regional Park. This has been achieved by enhancing habitats along the eastern edge, as well as green and brown roofs;
- d. some respondents indicated a preference for air cooling technology, whilst others had a preference for water cooling. As a result the Applicant undertook further consultation on the cooling technology during Phase Two Consultation;
- e. there was general support for EcoPark House (the Visitors' centre), and the proposal to retain the Edmonton Sea Cadets on-site. These elements of the Project were therefore progressed further;
- f. in response to comments raised on the safety of pedestrians and cyclists, new pedestrian and cycle facilities were incorporated into the proposals along Lee Park Way; and
- g. some of the comments requested more detailed information, for example on the proposed design, potential environmental effects and how they will be managed, waste forecasting and traffic impacts. This information was provided during Phase Two Consultation.

i.vi Feedback from Phase Two Consultation

i.vi.i During Phase Two Consultation a total of 123 responses¹ were received during Phase Two Consultation, and again, the Project was generally well received.

i.vi.ii The changes made to the Project as a result of these comments are summarised below:

¹ Some respondents submitted multiple responses. In total there were 123 responses from 116 respondents.

- a. EcoPark House was reduced from three storeys to two storeys in response to comments that the top storey of the building was unnecessary and ill-fitting with the surrounding context;
- b. some respondents considered the viewing platform on the ERF to be too large and overly dominant. In response the scale of the viewing platform was reduced and it was relocated to the southern edge of the ERF to maximise views;
- c. some respondents suggested that renewable energy, in the form of solar panels or wind turbines, should be incorporated. It is not feasible to incorporate wind turbines on the Edmonton EcoPark (refer to the Building Energy Assessment, appended to the Sustainability Statement (AD.05.13) for further information). However, in response the Project includes provision for solar panels on the roof of the ERF and RRF subject to cost benefit analysis; and
- d. comments were, on balance, in favour of avoiding the plume associated with water cooling condensers because of its visual impact and the potential for considering it to be smoke. In response the Applicant is proposing air cooling condensers which would not generate a plume.

i.vii Informal consultation

- i.vii.i In addition to the formal phases of consultation the Applicant undertook informal consultation throughout the development of the Project.
- i.vii.ii Informal consultation predominantly took the form of meetings with statutory consultees², including:
 - a. LB Enfield;
 - b. Environment Agency;
 - c. Transport for London;
 - d. Greater London Authority;
 - e. Lee Valley Regional Park Authority;
 - f. The Historic Buildings and Monuments Commission for England; and
 - g. Natural England.
- i.vii.iii Engagement was also undertaken through briefings with councillors, community groups and other organisations, as well as articles covering the Project in local and regional press.
- i.vii.iv In addition, the Planning Inspectorate held a round table meeting at the Edmonton EcoPark on 10 June 2015 to discuss procedural matters and any issues attendees might have regarding the Project. The meeting was attended by LB Enfield, LB Haringey, Environment Agency, Natural England, Lee Valley Regional Park Authority, Greater London Authority and Epping Forest District Council. The meeting was followed by a tour of the Edmonton EcoPark.

² The term 'statutory consultees' is used in this report to mean statutory bodies which have been consulted as part of this process.

Glossary

The following terms and acronyms appear in this Report. Refer to Application document AD01.05 for the full Project glossary and acronyms.

Term	Definition
Applicant	North London Waste Authority in their capacity as the applicant
Application	Application for a DCO submitted to the Secretary of State by the Authority
Application Site	The area that is the subject of the Application and is contained within the red-line boundary
Associated development	Developments that are required to support the operation of the ERF
Community Facilities	Facilities used for and by the community such as leisure and culture facilities and meeting places
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve and enhance. Designated by local authorities
Constituent Boroughs	The seven north London boroughs that make up the Authority: London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington, Waltham Forest
Decentralised Energy Network (DEN)	A network of hot water or steam carrying pipes for local property heat or cooling. The Lee Valley Heat Network referred to in this Application is one such DEN scheme
Design Code Principles	Set of written requirements for the design approach to the Project. The Design Code Principles apply to all permanent buildings and structures
EcoPark House	A two storey building to be used to accommodate the requirements of staff, visitors and the Edmonton Sea Cadets
Edmonton EcoPark	The existing operational waste management site where the permanent facilities will be located. The Edmonton EcoPark forms part of the Application Site.
Edmonton Sea Cadets	Part of the national Sea Cadets organisation; a non-service organisation with charitable status which works in partnership with the Royal Navy
EIA Regulations	Infrastructure Planning (Environmental Impact Assessment) Regulations 2009
Employment opportunities	Level of employment and access to that employment
Flood storage	The temporary storage of excess run-off or river flow in ponds, basins, reservoirs or on the floodplain
Green Belt	Area of open land around a city, on which building is restricted
Ground conditions	The nature, land quality and structure of the surface and underground materials
Groundwater	Water located beneath Earth's surface in soil pore spaces and in the fractures of rock formations
Groundwater abstractions	Water taken from a groundwater source (e.g. an abstraction well)
Hardstanding	Ground surfaced with a hard material

Term	Definition
Household Waste Recycling Centre(s) (HWRC)	Previously CA sites now referred to as RRCs
Lee Valley Heat Network (LVHN)	A local energy solution, producing heat and power from waste and water in the Lee Valley
Megawatt (MW)	Rate of energy output
Megawatt electricity (MW _e)	Rate of electrical energy output
Meridian Water Masterplan Area	A mixed use development site to the south of the Application Site
Municipal waste	Waste collected by a local authority, consisting of everyday items that are discarded by the public and businesses
Project	The North London Heat and Power Project
Resource Recovery Facility (RRF)	A single building incorporating the proposed RRC, RFPF and FPP
Recycling and Fuel Preparation Facility (RFPF)	The area within the RRF used for recycling and fuel preparation
s42 Consultees	Statutory consultees as prescribed by the Planning Act 2008 (as amended)
s47 Consultees	Local community consultees as prescribed by the Planning Act 2008 (as amended)
Sustainable Drainage Systems (SuDS)	A sequence of drainage management practices and control structures that aim to mimic natural drainage characteristics, i.e. are designed to drain and attenuate surface water in a more sustainable manner than some conventional techniques.
Temporary Laydown Area	Area within the Application Site that would provide a temporary compound during construction works
UK Power Networks (UKPN)	A regional electricity distribution network operator responsible for London

Acronyms

Term	Definition
BREEAM	Building Research Establishment Environmental Assessment Methodology
C&D	Construction and Demolition
C&I waste	Commercial and Industrial waste
C&RT	Canal & River Trust
CHP	Combined Heat and Power
CoCP	Code of Construction Practice
DAS	Design and Access Statement
DCO	Development Consent Order
DEN	Decentralised Energy Network
DHEC	District Heating Energy Centre
EfW	Energy-from-waste
EA	Environment Agency
EIA	Environmental Impact Assessment
ERF	Energy Recovery Facility
ES	Environmental Statement
FPP	Fuel Preparation Plant
FRA	Flood Risk Assessment
GLA	Greater London Authority
ha	Hectare
HIA	Health Impact Assessment
HWRC	Household Waste Recycling Centre(s)
IBA	Incinerator bottom ash
ID-fan	Induced draught fan
IEMA	Institute of Environmental Management and Assessment
IVC	In-vessel composting
LACW	Local Authority Collected Waste
LB	London Borough
LGVs	Light Goods Vehicles
LVHN	Lee Valley Heat Network
LVRP	Lee Valley Regional Park
LVRPA	Lee Valley Regional Park Authority
LWL	LondonWaste Limited
MSW	Municipal Solid Waste
NCN	National Cycle Network
NLWA	North London Waste Authority. See also 'Applicant' in Glossary
NLWP	North London Waste Plan

Term	Definition
NPPF	National Planning Policy Framework (March 2012)
NPS	National Policy Statement
NPS EN-1	Overarching National Policy Statement for Energy (July 2011)
NPS EN-3	National Policy Statement for Renewable Energy Infrastructure (July 2011)
NSIP	Nationally Significant Infrastructure Project
NTS	Non-technical summary
PEIR	Preliminary Environmental Information Report
PTAL	Public Transport Accessibility Level
RCVs	Refuse Collection Vehicles
RFPF	Recycling and Fuel Preparation Facility
RRC	Reuse and Recycling Centre (formerly referred to as HWRCs or CA sites)
RRF	Resource Recovery Facility
SoCC	Statement of Community Consultation
SoS	Secretary of State
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SuDS	Sustainable Drainage Systems
TA	Transport Assessment
TfL	Transport for London
TWUL	Thames Water Utilities Ltd
UKPN	UK Power Networks

1 Introduction

1.1 Introduction

- 1.1.1 This Consultation Report has been prepared to support North London Waste Authority's (the Applicant's) application (the Application) to the Secretary of State for Energy and Climate Change for a Development Consent Order (DCO) pursuant to section 37 of 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) capable of an electrical output of around 70 megawatts (MW_e) at the Edmonton EcoPark in north London with associated development, including a Resource Recovery Facility (RRF). The proposed ERF would replace the existing Energy from Waste (EfW) facility at the Edmonton EcoPark.
- 1.1.3 The Project is a Nationally Significant Infrastructure Project for the purposes of section 14(1)(a) and section 15 in part 3 of the Planning Act 2008 (as amended) because it involves the construction of a generating station that would have a capacity of more than 50MW_e.

1.2 Purpose of this Report

- 1.2.1 This Report sets out the process that has been undertaken, details the feedback received and explains how the feedback received has influenced the proposals in the Application for development consent. In accordance with section 37(7) of the Planning Act 2008 (as amended) this report details:
- what has been done in compliance with sections 37, 42, 47, 48 and 49 of the Planning Act 2008 (as amended);
 - responses to the consultation undertaken; and
 - the account taken of responses.
- 1.2.2 Paragraph 80 of statutory guidance issued by the Department of Communities and Local Government (DCLG) entitled Planning Act 2008: Guidance on the pre-application process (March 2015 edition) requires consultation reports to set out specifically what the applicant has done in compliance with the requirements of the Planning Act 2008 (as amended), relevant secondary legislation, the Statutory Guidance, and any relevant policies, guidance or advice published by Government or the Planning Inspectorate. Paragraph 80 also states that where the applicant has not followed the advice of the local authority or not complied with statutory guidance or any relevant Advice Note, it must provide an explanation for the action taken or not taken.
- 1.2.3 This Report forms part of a suite of documents accompanying the Application submitted in accordance with the requirements set out in section 55 of the Planning Act 2008 (as amended) and Regulations 5, 6 and 7 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (APFP Regulations 2009), and should be

read alongside those documents (see Project Navigation Document AD01.02).

1.2.4 This report is based on the analysis of consultation responses undertaken by OPM.

1.2.5 A copy of this Consultation Report has been sent to the host and adjoining authorities, namely London Borough (LB) of Enfield, LB Barnet, LB Waltham Forest, LB Haringey, Epping Forest District Council, Hertsmeire Borough Council, Broxbourne Borough Council, Welwyn Hatfield Borough Council, Essex County Council, Hertfordshire County Council and the Greater London Authority (GLA).

1.3 Document structure

1.3.1 The report is structured as follows:

- a. Section 1 – Introduction: includes an overview of the Applicant and the Project;
- b. Section 2 – Approach to consultation: describes how the Application complies with legislative requirements (including the Statement of Community Consultation (SoCC)) and written advice notes prepared by the Planning Inspectorate, and outlines how the approach to consultation has developed;
- c. Section 3 – Phase One Consultation process: gives an overview of the Phase One pre-submission consultation;
- d. Section 4 – Feedback from Phase One Consultation: summarises feedback received from consultation during Phase One Consultation and how this has been considered and incorporated into the Application;
- e. Section 5 – Phase Two Consultation process: gives an overview of the Phase Two pre-submission consultation;
- f. Section 6 – Feedback from Phase Two Consultation: summarises key feedback received from consultation during Phase Two Consultation and how this has been considered and incorporated into the Application;
- g. Section 7 – Informal consultation: summarises other types of engagement undertaken outside the formal consultation process; and
- h. Section 8 – Conclusion: sets out the conclusions.

1.4 The Applicant

1.4.1 Established in 1986, the Applicant is a statutory authority whose principal responsibility is the disposal of waste collected by the seven north London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the Constituent Boroughs).

1.4.2 The Applicant is the UK's second largest waste disposal authority, handling approximately 3 per cent of the total national Local Authority Collected Waste (LACW) stream. Since 1994 the Applicant has managed its waste arisings predominantly through its waste management contract with

LondonWaste Limited (LWL) and the use of the EfW facility at the existing Edmonton EcoPark and landfill outside of London.

1.5 The Application Site

- 1.5.1 The Application Site, as shown on the Site Location Plans (A_0001 and A_0002 in the Book of Plans (AD02.01)), extends to approximately 22 hectares and is located wholly within the London Borough of Enfield (LB Enfield). The Application Site comprises the existing waste management site known as the Edmonton EcoPark where the permanent facilities would be located, part of Ardra Road, land around the existing water pumping station at Ardra Road, Deephams Farm Road, part of Lee Park Way and land to the west of the River Lee Navigation, and land to the north of Advent Way and east of the River Lee Navigation (part of which would form the Temporary Laydown Area and new Lee Park Way access road). The post code for the Edmonton EcoPark is N18 3AG and the grid reference is TQ 35750 92860.
- 1.5.2 The Application Site includes all land required to deliver the Project. This includes land that would be required temporarily to facilitate the development.
- 1.5.3 Both the Application Site and the Edmonton EcoPark (existing and proposed) are shown on Plan A_0003 and A_0004 contained within the Book of Plans (AD02.01). Throughout this report references to the Application Site refer to the proposed extent of the Project works, and Edmonton EcoPark refers to the operational site. Upon completion of the Project the operational site would consist of the Edmonton EcoPark and additional land required to provide new access arrangements and for a water pumping station adjacent to the Deephams Sewage Treatment Works outflow channel.

Edmonton EcoPark

- 1.5.4 The Edmonton EcoPark is an existing waste management complex of around 16 hectares, with an EfW facility which treats circa 540,000 tonnes per annum (tpa) of residual waste and generates around 40MWe (gross) of electricity; an In-Vessel Composting (IVC) facility; a Bulky Waste Recycling Facility (BWRF) and Fuel Preparation Plant (FPP); an Incinerator Bottom Ash (IBA) Recycling Facility; a fleet management and maintenance facility; associated offices, car parking and plant required to operate the facility; and a former wharf and single storey building utilised by the Edmonton Sea Cadets under a lease.
- 1.5.5 In order to construct the proposed ERF, the existing BWRF and FPP activities would be relocated within the Application Site; the IVC facility would be decommissioned and the IBA recycling would take place off-site.

Temporary Laydown Area and eastern access

- 1.5.6 The proposed Temporary Laydown Area is an area of open scrubland located to the east of the River Lee Navigation and north of Advent Way. There is no public access to this area. The Temporary Laydown Area would

be reinstated after construction and would not form part of the ongoing operational site.

- 1.5.7 In addition to the Temporary Laydown Area the Application Site includes land to the east of the existing Edmonton EcoPark which would be used for the new Lee Park Way entrance and landscaping along the eastern boundary.

Northern access

- 1.5.8 The Application Site also includes Deephams Farm Road and part of Ardra Road with land currently occupied by the EfW facility water pumping station between the junction of A1005 Meridian Way and Deephams Farm Road.

1.6 Surrounding area

- 1.6.1 The Application Site is located to the north of the A406 North Circular Road in an area that is predominantly industrial. The Lee Valley Regional Park (LVRP) is located to the east of the Edmonton EcoPark.
- 1.6.2 Land to the north and west of the Application Site is predominantly industrial in nature. Immediately to the north of the Edmonton EcoPark is an existing Materials Recovery Facility (MRF), which is operated by a commercial waste management company, alongside other industrial buildings. Further north is Deephams Sewage Treatment Works. Beyond the industrial area to the north-west is a residential area with Badma Close being the nearest residential street to the Application Site (approximately 60m from the nearest part of the boundary) and Zambezie Drive the nearest to the Edmonton EcoPark at approximately 125m west.
- 1.6.3 Eley Industrial Estate, located to the west of the Application Site, comprises a mixture of retail, industrial and warehouse units.
- 1.6.4 Advent Way is located to the south of the Application Site adjacent to the A406 North Circular Road. Beyond the A406 North Circular Road are retail and trading estates; this area is identified for future redevelopment to provide a housing-led mixed use development known as Meridian Water.
- i.vii.v The LVRP and River Lee Navigation are immediately adjacent to the eastern boundary of the Edmonton EcoPark, and Lee Park Way, a private road which also forms part of National Cycle Network (NCN) Route 1, runs alongside the River Lee Navigation. To the east of the River Lee Navigation is the William Girling Reservoir along with an area currently occupied by Camden Plant Ltd. which is used for the crushing, screening and stockpiling of waste concrete, soil and other recyclable materials from construction and demolition. The nearest residential areas to the east of the Application Site and LVRP are located at Lower Hall Lane, approximately 550m from the Edmonton EcoPark and 150m from the eastern edge of the Application Site.

1.7 The Project

- 1.7.1 The Project would replace the existing EfW facility at Edmonton EcoPark, which is expected to cease operations in around 2025, with a new and more efficient ERF which would produce energy from residual waste, and associated development, including temporary works required to facilitate

construction, demolition and commissioning. The proposed ERF would surpass the requirement under the Waste Framework Directive (Directive 2008/98/EC) to achieve an efficiency rating in excess of the prescribed level, and would therefore be classified as a waste recovery operation rather than disposal.

1.7.2 The main features of the Project once the proposed ERF and permanent associated works are constructed and the existing EfW facility is demolished are set out in the Book of Plans (AD02.01) and comprise:

- a. a northern area of the Edmonton EcoPark accommodating the proposed ERF;
- b. a southern area of the Edmonton EcoPark accommodating the RRF and a visitor, community and education centre with offices and a base for the Edmonton Sea Cadets ('EcoPark House');
- c. a central space, where the existing EfW facility is currently located, which would be available for future waste-related development;
- d. a new landscape area along the edge with the River Lee Navigation; and
- e. new northern and eastern Edmonton EcoPark access points.

1.7.3 During construction there is a need to accommodate a Temporary Laydown Area outside of the future operational site because of space constraints. This would be used to provide parking and accommodation for temporary staff (offices, staff welfare facilities), storage and fabrication areas, and associated access and utilities.

1.7.4 Schedule 1 of the Draft DCO (AD03.01) sets out the authorised development and the works are shown in the Book of Plans (AD02.01), supplemented by Illustrative Plans (included in the Design Code Principles, AD02.02) that set out the indicative form and location of buildings, structures, plant and equipment, in line with the limits of deviation established by the Draft DCO (AD03.01).

1.8 Stages of development

1.8.1 The proposed ERF is intended to be operational before the end of 2025, but with the precise timing of the replacement to be determined. In order to do this, the following key steps are required:

- a. obtain a DCO for the new facility and associated developments;
- b. obtain relevant environmental permit(s) and other licences, consents and permits needed;
- c. identify a suitable technology supplier;
- d. agree and arrange source(s) of funding;
- e. enter into contract(s) for design, build and operation of new facility and associated development;
- f. move to operation of new facility; and
- g. decommission and demolish the existing EfW facility.

- 1.8.2 Site preparation and construction would be undertaken over a number of years and it is expected that the earliest construction would commence is 2019/20, although this may be later. Construction would be implemented in stages to ensure that essential waste management operations remain functioning throughout. This is especially relevant for the existing EfW facility and associated support facilities.
- 1.8.3 The stages of the Project are as follows:
- a. Stage 1a: site preparation and enabling works;
 - b. Stage 1b: construction of RRF, EcoPark House and commencement of use of Temporary Laydown Area;
 - c. Stage 1c: operation of RRF, EcoPark House and demolition/clearance of northern area;
 - d. Stage 1d: construction of ERF;
 - e. Stage 2: commissioning of ERF alongside operation of EfW facility, i.e. transition period;
 - f. Stage 3: operation of ERF, RRF and EcoPark House, demolition of EfW facility; and
 - g. Stage 4: operation of ERF, RRF and EcoPark House, i.e. final operational situation.

2 Approach to consultation

2.1 Compliance with statutory requirements

- 2.1.1 Section 55(3)(e) of the Planning Act 2008 (as amended) provides that the Secretary of State (SoS) may only accept the application for development consent if it is concluded (amongst other matters) that the applicant has complied in accordance with the requirements of the pre-application procedure set out in chapter 2 of part 5 of the Planning Act 2008 (as amended). Appendix 3 of the Planning Inspectorate's Advice Note 6: Preparation and submission of application documents (October 2014) comprises a section 55 Application Checklist based upon the statutory criteria for acceptance of applications set out in section 55(3). The parts of this relating to consultation have been extracted in Table 2.1 which outlines how the criteria have been met and where further information can be found in this Report.
- 2.1.2 This Consultation Report has been compiled in line with the statutory requirements set out in the Planning Act 2008 (as amended). The structure and contents of the Report have also been prepared in accordance with the Planning Inspectorates Advice Note 14: Compiling the consultation report (April 2012).
- 2.1.3 After the end of Phase One Consultation and before the start of Phase Two Consultation additional statutory guidance on the pre-application process was published by the DCLG: Planning Act 2008: Guidance on the pre-application process (March 2015). This statutory guidance is "*not intended to make, and should not be construed as making any significant additional or changed requirements or expectation*" (paragraph 11). Nevertheless Phase Two Consultation was undertaken in accordance with the statutory guidance contained in this document and this Consultation Report has been drafted in accordance with this new guidance.

Table 2.1: Compliance with section 55(3)(e) of the Planning Act 2008 (as amended)

Acceptance criteria			How the acceptance criteria have been met	Further information
Section 41 Planning Act 2008 (as amended)	a)	Section 41 Planning Act 2008 (as amended) states that the requirements set out in Part 2 of the Planning Act 2008 (as amended) apply before an application has been made and provides definitions of the "proposed application", "the land" and the "proposed development".	The Applicant undertook the activity listed below before submitting the Application.	-
Section 42 Planning Act 2008 (as amended) - duty to consult	b)	Did the applicant consult the following about the proposed application:		
	c)	Section 42(1)(a) persons prescribed?	Yes. Consultation was undertaken with the bodies specified in section 42(1)(a) of the Planning Act 2008 (as amended) at both phases of consultation.	See Section 3.2 for more information on consultees. Appendix B1 and Appendix B2 contain full lists of section 42 consultees for both Phase One Consultation and Phase Two Consultation.
	d)	Section 42(1)(aa) the Marine Management Organisation?	The Application does not affect and is not likely to affect any of the areas listed within section 42(2) Planning Act 2008 (as amended) that would make it necessary to consult the Marine Management Organisation (MMO) pursuant to section 42(1)(aa). Nevertheless, the Applicant wrote to the MMO on 25 November 2014 notifying them that, in the opinion of the Applicant, the Application did not concern them but requested the MMO to reply to confirm that the MMO agreed that it need not be consulted. No response was received.	-

Acceptance criteria			How the acceptance criteria have been met	Further information
	e)	Section 42(1)(b) each local authority within section 43?	Yes. Each relevant local authority within section 43 Planning Act 2008 (as amended) (was identified and consulted at both phases of consultation.	See Section 3.2 for a list of the relevant local authorities falling within section 43 Planning Act 2008 (as amended). Appendix B1 and Appendix B2 contain full lists of section 42 consultees for both Phase One Consultation and Phase Two Consultation.
	f)	Section 42(1)(c) the Greater London Authority (if in Greater London area)?	Yes. The Greater London Authority was consulted during Phase One and Phase Two Consultation.	See Section 3.2 for more information on consultees. Appendix B1 and Appendix B2 contain full lists of section 42 consultees for both Phase One Consultation and Phase Two Consultation.
	g)	Section 42(1)(d) each person in one or more of the following categories (as set out in section 44): i Category 1 – owner, lessee, tenant or occupier of the land. ii Category 2 – person interested in the land, or has power to sell and convey the land, or has power to release the land. iii Category 3 – person entitled to make a relevant claim.	Yes, the Applicant identified and consultation was undertaken with each relevant party falling under the categories set out in section 44 Planning Act 2008 (as amended).	See Section 3 for more information on consultees. Appendix B contains full lists of section 44 consultees for both Phase One Consultation and Phase Two Consultation.
Section 45 Planning Act 2008 (as amended) - timetable for section 42 consultation	h)	Did the applicant notify section 42 Planning Act 2008 (as amended) consultees of the deadline for receipt of consultation responses; and if so was the deadline notified by the applicant 28 days or more starting with the day after receipt of the consultation documents?	Yes. Before Phase One and Phase Two Consultations commenced, section 42 consultees were notified of the deadline for receipt of consultation responses. This deadline was contained within the notification of consultation letters sent to section 42 consultees. These letters were dated 25 November 2014 (in respect of	Sample letters sent to section 42 consultees are provided as part of Appendix C2. Sections 3.4 and 5.4 demonstrate how the Applicant kept section 42 consultees informed of consultation deadlines throughout each phase of consultation (these methods

Acceptance criteria			How the acceptance criteria have been met	Further information
			<p>Phase One Consultation) and on 15 May 2015 (in respect of Phase Two Consultation) and sent on the same date. The notification letters sent to section 42 consultees enclosed all the consultation materials relevant to the particular phase of consultation.</p> <p>Each phase of consultation (and thus the deadline for receipt of consultation responses for each phase of consultation) exceeded 28 days. Phase One Consultation lasted from 28 November 2014 to 27 January 2015 (61 days) and Phase Two Consultation lasted from 18 May to 30 June (44 days).</p>	included exhibitions, adverts, newsletters, a dedicated website, and leaflets).
Section 46 Planning Act 2008 (as amended) - duty to notify secretary of state of proposed application	i)	Did the applicant supply information to notify the Secretary of State of the proposed application; and if so was the information supplied to the Secretary of State on or before the date it was sent to the section 42 consultees? Was this done on or before commencing consultation under section 42?	<p>Yes. Before commencing Phase One and Phase Two Consultations the SoS was notified of the proposed Application and supplied with information relating to the proposed Application (the information sent to the SoS in each case was the same information sent to section 42 consultees with respect to the relevant phase of consultation, as required by section 46(1) Planning Act 2008 (as amended)). These notifications to the SoS were sent by letters dated 19 November 2014 (in the case of Phase One Consultation, which commenced on 28 November 2014) and 15 May 2015 (in the case of Phase Two Consultation, which commenced on 18 May 2015).</p> <p>Section 42 consultees were sent letters notifying them of consultation on 25 November 2014 (in respect of Phase One</p>	A copy of these notifications can be found in Appendix C2.

Acceptance criteria			How the acceptance criteria have been met	Further information
			Consultation) and on 15 May 2015 (in respect of Phase Two Consultation). Therefore, the Secretary of State was sent notification of Phase One Consultation six days before section 42 consultees were sent notifications of the commencement for Phase One Consultation and on the same date for Phase Two Consultation.	
Section 47 Planning Act 2008 (as amended) - duty to consult with local community	j)	Did the applicant prepare a statement of community consultation (SoCC) on how it intended to consult people living in the vicinity of the land?	Yes. A SoCC was prepared prior to Phase One Consultation. Notice of the SoCC was published in the Enfield Independent on 26 November 2014 (i.e. before Phase One Consultation commenced). Hard copies of the SoCC were made available at Edmonton Green Library, Green Towers Community Centre, South Chingford Library, Coombes Croft Library and Enfield Civic Centre during Phase One and Phase Two Consultation.	Section 2.5 outlines the process undertaken in producing the SoCC. A copy of the SoCC and notice of the SoCC are contained in Appendix A3 and Appendix C1 respectively.
	k)	Were “B” and (where relevant) “C” authorities consulted about the content of the SoCC; and if so was the deadline for receipt of responses 28 days beginning with the day after the day that “B” and (where applicable) “C” authorities received the consultation documents?	Section 47(2) of the Planning Act 2008 (as amended) requires the applicant to consult each local authority under section 43(1) of the Planning Act 2008 (as amended) on the SoCC. The proposed application is located entirely within the London Borough of Enfield and LB Enfield is therefore the only local authority under section 43(1) Planning Act 2008 (as amended). LB Enfield was consulted on the draft SoCC and given 28 days to respond.	Section 2.5 sets out consultation on the SoCC.

Acceptance criteria			How the acceptance criteria have been met	Further information
			No relevant Category C authority was identified.	
	l)	Has the applicant had regard to any responses received when preparing the SoCC?	Yes. The responses from LB Enfield were addressed in the final version of the SoCC.	Table 2.2 shows the comments received from LB Enfield on the SoCC, and outlines how these were taken on board for the final draft of the SoCC.
	m)	Has the SoCC been made available for inspection in a way that is reasonably convenient for people living in the vicinity of the land; and has a notice been published in a newspaper circulating in the vicinity of the land which states where and when the SoCC can be inspected?	<p>Yes. Notice of the SoCC was published in the Enfield Independent on 26 November 2014. This notice included where and when the SoCC could be inspected.</p> <p>The SoCC was made available on the Project website from 20 November 2015, was available in printed format at all public exhibitions, and in printed format at Edmonton Green Library, Green Towers Community Centre, South Chingford Library, Coombes Croft Library and Enfield Civic Centre during Phase One and Phase Two Consultation. It was also available upon request.</p>	A copy of the newspaper advert providing notice of the SoCC included in Appendix C1.
	n)	Does the SoCC set out whether the development is EIA development; and does it set out how the applicant intends to publicise and consult on the preliminary environmental information?	Yes. The SoCC stated that the development is EIA development and that an EIA would be undertaken as part of the Application. It also stated that Preliminary Environmental Information would be made available at Phase Two Consultation.	Paragraph 2.5.1311 outlines the SoCCs consideration of EIA. The SoCC is included in Appendix A3, the EIA is referenced in the third page of SoCC (page A-17).
	o)	Has the applicant carried out the consultation in accordance with the SoCC?	Yes. Consultation has been undertaken in accordance with the SoCC. The SoCC stated that the Applicant would look to set up a Community Liaison Group. This Group was not established because	Refer to Table 2.3 for more information.

Acceptance criteria			How the acceptance criteria have been met	Further information
			discussions with local Members suggested this would be of benefit at a later stage in the Project. Local councillors and community groups were instead consulted using alternative mechanisms, such as community briefings.	
Section 48 - duty to publicise the proposed application	p)	Did the applicant publish a notice, as required by Regulation 4(2) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations):		
	q)	(a) for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the proposed development would be situated;	Yes. The notice was published in the: Enfield Independent on 13 May 2015 and 20 May 2015; Haringey Independent on 15 May 2015 and 22 May 2015; and Waltham Forest Independent on 15 May 2015 and 22 May 2015. These publications are published once a week. The local publications were chosen because they had the highest circulation whilst covering the whole of their respective boroughs.	Please see Section 5.5.
	r)	(b) once in a national newspaper;	Yes. The notice was published in The Times on 18 May 2015.	Please see Paragraph 5.5.3.
	s)	(c) once in the London Gazette and, if land in Scotland is affected, the Edinburgh Gazette; and	Yes. The notice was published in the London Gazette on 18 May 2015. Copies of notices can be found in Appendix C7.	Please see Paragraph 5.5.3.
	t)	Did the notice include, as required by Regulation 4(3) of APFP Regulations:		
	u)	(a) the name and address of the applicant;	Yes	Details of how the Applicant has complied with section 48 publicity are outlined in Section 5.5. Copies
	v)	(b) a statement that the applicant intends to make an application for development consent to the Secretary of State;	Yes	

Acceptance criteria			How the acceptance criteria have been met	Further information
	w)	(c) a statement as to whether the application is EIA development;	Yes	of all section 48 notices are included in Appendix C7.
	x)	(d) a summary of the main proposals, specifying the location or route of the proposed development;	Yes	
	y)	(e) a statement that the documents, plans and maps showing the nature and location of the proposed development are available for inspection free of charge at the places (including at least one address in the vicinity of the proposed development) and times set out in the notice	Yes	
	z)	(f) the latest date on which those documents, plans and maps will be available for inspection (being a date not earlier than the deadline in sub-paragraph (i));	Yes	
	aa)	(g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge;	Yes	
	bb)	(h) details of how to respond to the publicity; and	Yes	
	cc)	(i) a deadline for receipt of those responses by the applicant, being not less than 28 days following the date when the notice is last published?	Yes	
	dd)	Has a copy of the section 48 notice been sent to the EIA consultation bodies and to any person notified to the applicant in accordance with Regulation 9(1)(c) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the EIA Regulations)11?	Yes	
Section 49 duty to take account of responses to	ee)	Has the applicant had regard to any relevant responses to the section 42, section 47 and section 48 consultation?	Yes. The Applicant has had regard to the responses to the section 42, 47 and 48 Consultation.	Sections 4 and 6 set out the responses received and the Applicant's response and the

Acceptance criteria			How the acceptance criteria have been met	Further information
consultation and publicity				regard the Applicant has had to those consultation responses.
	ff)	To what extent has the applicant had regard to DCLG guidance 'The Planning Act 2008: Guidance on the pre-application process'?	Pre-application consultation has been carried out in accordance with the DCLG Guidance contained in Planning Act 2008: Guidance on the pre-application process. This guidance was updated in March 2015. Sections 4 and 6 of this report set out in full detail the Applicant's responses to comments received as a result of consultation and publicity and how those comments have been taken into account by the Applicant when developing its proposals.	Sections 3 to 5 set out the approach taken during formal consultation. Section 7 sets out the other, informal engagement undertaken.
Section 50 – duty to follow statutory guidance	gg)	Section 50 Planning Act 2008 (as amended) states that guidance may be published on how to comply with Chapter 2 of the Planning Act 2008 (as amended) and that applicants must comply with any such guidance	Yes. In publicising its Application, producing its SoCC, undertaking consultation pursuant to sections 42 and 47 and producing its consultation report, the Applicant referred to the following guidance: DCLG Guidance Planning Act 2008: Guidance on the pre-application process.	Sections 2.1, 2.2 and 5.1 set out how statutory guidance has been addressed.

2.2 Approach to consultation

- 2.2.1 Prior to submitting an application for a development consent order, applicants have a statutory duty to consult on and publicise the proposed application in accordance with the Planning Act 2008 (as amended) and regulations made pursuant to the Act.
- 2.2.2 This Section describes the relevant statutory consultation requirements, as set out in:
- a. the Planning Act 2008 (as amended);
 - b. the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (APFP Regulations); and
 - c. the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended).
- 2.2.3 Section 50 of the Planning Act 2008 (as amended) requires applicants to also have regard to any statutory guidance issued by the Secretary of State. In 2010, the Department of Communities and Local Government issued statutory guidance entitled Planning Act 2008: Guidance on the pre-application process, which contained guidance relating to pre-application consultation. This statutory guidance was then revised in March 2015 (i.e. after Phase One of the Applicant's statutory consultation and before Phase Two of the Applicant's statutory consultation). The Applicant followed the guidance available at each stage of its consultation. Paragraph 11 of the 2015 version of this statutory guidance (which is at the time of writing still the current edition) states:
- "This guidance is periodically refreshed to better reflect knowledge of good practice, changing circumstances and feedback from users on its clarity and helpfulness. The latest (March 2015) changes are intended to be minor and clarificatory in nature and are not intended to make, and should not be construed as making any significant additional or changed requirements or expectations. In particular, applicants who have already commenced their statutory pre-application consultation would not be expected to re-visit what they have already done at the time of the publication of this version on the basis of changes in this version if they have reached a stage where they would be unable to take them into account. However, if applicants are relying on any parts of the previous version of this guidance they should state this clearly in their application."*
- 2.2.4 The statutory guidance on the pre-application process also requires applicants to satisfy themselves that they have complied with all applicable guidance. In this respect, the Applicant has also had regard to relevant advice provided by the Planning Inspectorate in relation to pre-application consultation, the identification of consultees and the preparation of consultation reports contained within:
- a. Advice Note 2: The role of local authorities in the development consent process (February 2015);

- b. Advice Note 3: EIA Notification and Consultation (version 5 published in July 2013) including the annex to Advice Note 3 relating to prescribed and non-prescribed consultation bodies;
- c. Advice Note 6: Preparation and submission of application documents (October 2014); and
- d. Advice Note 14: Compiling the Consultation Report (April 2012).

2.2.5 Paragraph 18 of the 2015 statutory guidance also states:

"Early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties, by helping the applicant identify and resolve issues at the earliest stage, which can reduce the overall risk to the project further down the line as it becomes more difficult to make changes once an application has been submitted;

enabling members of the public to influence proposed projects, feedback on potential options, and encouraging the community to help shape the proposal to maximise local benefits and minimise any downsides; helping local people understand the potential nature and local impact of the proposed project, with the potential to dispel misapprehensions at an early stage;

enabling applicants to obtain important information about the economic, social and environmental impacts of a scheme from consultees, which can help rule out unsuitable options; enabling potential mitigating measures to be considered and, if appropriate, built into the project before an application is submitted; and

identifying ways in which the project could, without significant costs to promoters, support wider strategic or local objectives."

2.2.6 The Applicant's pre-application consultation has been structured to achieve the benefits quoted above.

2.3 Statutory consultation in accordance with Chapter 2 of Part 5 of the Planning Act 2008 (as amended), related regulations and guidance

2.3.1 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 procedure.

2.3.2 The requirements in Chapter 2 of Part 5 of the Planning Act 2008 (as amended) that relate to pre-application consultation are as follows:

- a. section 42 requires applicants to consult with:
 - such persons as may be prescribed (section 42(1)(a)). These prescribed consultees are listed in schedule 1 to the APFP regulations;
 - relevant local authorities as categorised in section 43 (section 42(1)(b));

- the Greater London Authority, if the application site is located within Greater London (section 42(1)(c); and
 - those with an interest in land, as categorised in section 44 (section 42(1)(d)).
- b. section 45 requires that section 42 consultees are given at least 28 days (starting on the first day after receipt of the consultation documents) to respond to consultation.
- c. section 46 requires that on or before commencing consultation under section 42, applicants notify the SoS (through the Planning Inspectorate) of their intent to submit an application for a DCO and to provide the SoS with the same consultation material that will be provided/is provided to section 42 consultees.
- d. section 47 places a duty on the Applicant to consult the local community (more precisely referred to in section 47 as "*people living in the vicinity of the land*") and to do the following:
- to prepare a 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 (this minimum of 28 days is to begin with the day after the day on which the relevant local authority receives the consultation documents relating to the SoCC) about what is to be in the SoCC;
 - to have regard to the responses on the draft SoCC received from the relevant local authorities;
 - once the SoCC is finalised, to make the SoCC available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land;
 - to publish notice of the SoCC in a newspaper circulating in the vicinity of the land, such notice to state where and when the SoCC can be inspected;
 - to publish the finalised SoCC in such a manner as may be prescribed; and
 - to carry out consultation of those living in the vicinity of the land in accordance with the SoCC.
- e. Section 48 requires applicants to publicise their application for a DCO in the prescribed manner. The prescribed manner is set out in Regulation 4 of the APFP Regulations 2009, and requires a notice of the proposed application. This notice must contain certain details about the proposed development, and these details are listed in Regulation 4 (Table 2.1 which lists the required contents of the notice and also confirms that the Applicant has complied with this). The notice of the proposed application must be published for at least two successive weeks in certain categories of newspapers listed in Regulation 4 of the APFP Regulations 2009. The notice must also set a deadline for receipt of responses to the section 48 publicity (this deadline is prescribed by

Regulation 4(3) of the APFP Regulations 2009 and is currently a minimum of 28 days following the date when the notice is last published).

- f. section 49 requires applicants to take account of relevant responses³ to consultation carried out pursuant to section 42 and section 47, and publicity carried out pursuant to section 48, when deciding whether to make an application for a DCO in the same terms as the proposed application. Sections 4 and 6 of this report set out in detail how the Applicant has taken into account relevant responses received during Phase One Consultation and Phase Two Consultation.
- g. 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 details of the account taken by the promoter of any such response.

2.3.3 Sections 3 and 5 of this Report set out in detail how sections 42 to 50 of the Planning Act 2008 (as amended) have been complied with by the Applicant in relation to its pre-application consultation.

2.4 Statutory consultation requirements: EIA Regulations

2.4.1 Advice Note 14 states that:

“Consultation undertaken as part of the EIA regime is separate to that required under the Planning Act 2008. Applicants may wish to draw attention to consultation responses received under the EIA process, but any reference to this consultation should be kept separate from the statutory consultation carried out under the provisions of the Planning Act 2008.”

2.4.2 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended) (EIA Regulations) contain the following provisions that are relevant to pre-application consultation.

2.4.3 Regulation 6 of the EIA Regulations requires an applicant, before carrying out consultation under section 42 of the Planning Act 2008 (as amended), to notify the SoS that it either proposes to provide an Environmental Statement in respect of the proposed development, or request a screening opinion.

2.4.4 The Applicant formally provided notification under Regulation 6(1)(b) of the EIA Regulations that it proposes to provide an Environmental Statement (ES) in respect of the proposed development to the SoS on 10 October 2014. A copy of the notice can be found in Appendix C8.

³ Section 49(3) of the Planning Act 2008 (as amended) 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.

- 2.4.5 Regulation 9 of the EIA Regulations requires the SoS to (amongst other things) notify the applicant of any particular person whom it considers:
- a. to be affected by the proposed development; or
 - b. likely to be affected by the proposed development; or
 - c. have an interest in the proposed development; and
 - d. to be unlikely to become aware of the proposed development by means of the measures taken in compliance with Part 5 of the Planning Act 2008 (as amended).
- 2.4.6 The SoS sent a list of these persons to the Applicant on 6 November 2014 (Regulation 9 List). A copy of the Regulation 9 List received is contained within Appendix B4.
- 2.4.7 In accordance with Advice Note 14, the Planning Inspectorate recommends that the Applicant sets out in its consultation report how the consultees prescribed under the EIA Regulations were able to access the consultation material.
- 2.4.8 The Applicant consulted all those listed on the Regulation 9 List during both Phase One and Phase Two Consultations. The Regulation 9 List consultees were consulted at the same time as all section 42 consultees were consulted. The lists of those consulted during Phase One Consultation and Phase Two Consultation contained within Appendix B1 and B2 include those persons listed on the Regulation 9 List. The Regulation 9 List persons were sent letters notifying them of both phases of consultation; these letters were sent on the same dates (25 November 2014 in relation to Phase One Consultation and 15 May 2015 in relation to Phase Two Consultation) and were identical in format and content to the Phase One and Phase Two Consultation section 42 letters. The same consultation materials sent to all section 42 consultees were enclosed in the notification letter sent to Regulation 9 List persons. The letters requested their comments to be given by the same deadlines as were given to the section 42 consultees (27 January 2015 for Phase One and 30 June 2015 for Phase Two). Regulation 9 List persons were therefore given the same amount of time as section 42 consultees to provide feedback in relation to Phase One and Phase Two Consultation.
- 2.4.9 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.
- 2.4.10 In accordance with Regulation 10 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 Two Consultation.
- 2.4.11 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 (as defined in the EIA Regulations) and to any person notified to the

applicant under Regulation 9(1)(c). The consultation bodies in this context are defined by the EIA Regulations as being: (i) a body prescribed under the APFP Regulations 2009; (ii) the relevant local authorities pursuant to section 43 of the Planning Act 2008 (as amended); and (iii) the Greater London Authority (if the proposed application relates to land in Greater London).

- 2.4.12 In accordance with Regulation 11 of the EIA Regulations, at the same time as publishing a notice of the Application under section 48(1) of the Planning Act 2008 (as amended), the Applicant sent a copy of that notice to the consultation bodies (as defined in the EIA Regulations) on 15 May 2015, the identity and contact details of whom were notified to the Applicant by the Planning Inspectorate pursuant to Regulation 9(1)(b) of the EIA Regulations. A copy of the notice can be found in Appendix C9.

2.5 Statutory consultation: Consultation in accordance with section 47 of the Planning Act 2008 (as amended): The Statement of Community Consultation (SoCC)

Role of the Statement of Community Consultation

- 2.5.1 An important aim of the pre-application consultation on the Project was to ensure that the local community and other interested parties have a chance to understand and influence the proposals.
- 2.5.2 Section 47 Planning Act 2008 (as amended) requires applicants to prepare a statement setting out how it proposes to consult, about the proposed application, people living within the vicinity of the land (referred to as the 'local community' in this report).
- 2.5.3 The SoCC that has been prepared and implemented by the Applicant sets out the approach to local community consultation; primarily setting out the nature of consultation at Phase One and Phase Two, outlining when, how, where and with whom consultation would be undertaken. The SoCC also outlines the approach taken to EIA and sets out that Preliminary Environmental Information would be made available during Phase Two Consultation.

Development of the Statement of Community Consultation

- 2.5.4 DCLG's Planning Act 2008: Guidance on the pre-application process (March 2015) sets out that a "*one-size-fits-all*" approach to consultation is not appropriate for Nationally Significant Infrastructure Projects (NSIPs) and therefore applicants, who are best placed to understand the detail of their specific project, and the relevant local authorities, who have a unique knowledge of their local communities, should as far as possible work together to develop plans for consultation.
- 2.5.5 Section 47(2) of the Planning Act 2008 (as amended) provides that before preparing a SoCC, the applicant must consult each local authority within whose area the land is located about what is to be in the SoCC.
- 2.5.6 The land subject to the proposals is located solely within LB Enfield. A collaborative approach with LB Enfield was taken to develop the approach

to section 47 consultation. Before formal consultation with LB Enfield on the draft SoCC, regular meetings were held which sought to agree how to consult, whom to consult and what to consult upon. Discussions covered the make-up of the area, particular groups with special requirements and advice on the appropriateness of the consultation techniques and methods proposed. In this way the SoCC was developed using an iterative process which incorporated LB Enfield's views from the outset.

- 2.5.7 A draft of the SoCC was issued to LB Enfield for formal consultation on 14 October 2014. LB Enfield had a period of 28 days (starting from the day after the day it received the draft SoCC) within which to respond. This period of time is consistent with the requirements of section 47(3) Planning Act 2008 (as amended).
- 2.5.8 Comments were received from LB Enfield via email on 11 November 2014. They covered a number of themes, with particular emphasis on keeping members of the local community up to date with Project progress, helping them to understand what the Project will do and ensuring adequate publicity of consultation activities. Table 2.2 outlines the comments made by LB Enfield on the draft SoCC. Where an individual officer's name was included in the comment, this has been replaced in the table with xxxxxxxx to accord with the requirements of data protection. A copy of LB Enfield's response can be found in Appendix A1.
- 2.5.9 Section 47(5) of the Planning Act 2008 (as amended) requires that in preparing the SoCC, an applicant must have regard to any response to consultation on the draft SoCC that is received from the relevant local authority within the deadline for comments. A response to all comments from LB Enfield was provided by the Applicant on 17 November 2014, a copy is contained in Appendix A2. In some cases the comments received from LB Enfield resulted in a change to the draft SoCC; where this is the case it is noted in the table.

Table 2.2: LB Enfield comments on the SoCC

Ref	LB Enfield comment	Applicant response
a)	This version does not address xxxxxxxxx's previous comments on Hard to Reach groups	<p>Comment noted. LB Enfield was advised that xxxxxxxxx's original comments were not provided. Further NLWA is committed to engaging with hard to reach groups and had liaised with LB Enfield's Communications Team about how to achieve this. The Applicant had already agreed the following measures with LB Enfield's Communications Team:</p> <ol style="list-style-type: none"> 1. LB Enfield Communication's team would send out Project press releases to local ethnic media. 2. Information would be provided to Voluntary Action for inclusion in its newsletter which is issued to approximately 750 local groups. 3. NLWA offered presentations on the Project to local groups with members living in the vicinity that cannot get to exhibitions where there is sufficient demand and this would be an appropriate use of resources.

Ref	LB Enfield comment	Applicant response
b)	It would be helpful to provide a simplified diagram to help explain what the facility does.	Comment noted. LB Enfield was advised that the purpose of the SoCC is to provide information about how consultation on the Project would be undertaken and directs people to the consultation materials. It is not intended to give detailed information on the proposal itself. Diagrams, including one of how energy is recovered from waste would be included in the consultation materials and at the exhibitions. Additionally a short video explaining the Project would be available on the website and at the Phase One exhibitions.
c)	Why can't preliminary environmental information be provided during the Phase One Consultation	Comment noted. At Phase One information would be made available on environmental issues in the context of a phase of consultation that is introducing emerging ideas for the Project. This included background information, such as the scoping report on the ES.
d)	Consultation activities should include advertising in local papers otherwise how will they raise broader public awareness	Comment noted. LB Enfield was advised that adverts notifying the local community of consultation on the Project would be placed in the following local newspapers: Barnet and Potters Bar Times, Hendon and Finchley Times, Edgware and Mill Hill Times, Camden New Journal, Camden Magazine, Ham and High, Enfield Independent, Our Enfield, Hackney Today, Hackney Gazette, Haringey People, Haringey Independent, Islington Gazette, Islington Life Magazine, Waltham Forest News, Waltham Forest Guardian, Londra Gazette and Parikiaki.
e)	Not sure what the rationale is for 1.5km consultation radius? Have Arup spoken to you about this?	Comment noted. Section 47(1) of the Planning Act 2008 (as amended) states that the appropriate area for consultation must include " <i>people living in the vicinity of the land</i> ". The Applicant has selected a distance of 1.5km as it is considered to be an appropriate interpretation of this requirement for the type of development proposed. Approximately 29,000 addresses are located within this boundary, all of which would be delivered copies of the newsletters.
f)	Written feedback forms should be included as part of leaflet drop	Feedback forms would not be included with the leaflets as the public needed to have access to all consultation materials before completing the feedback form. The leaflets would set out how members of the local community can access the consultation materials either by visiting the website or attending an exhibition. Additionally the leaflet would provide contact information through which the public can request that a feedback form be posted to them. A freepost address would be provided for forms and comments to be returned.
g)	It would be useful to provide information on how people can keep up to date with the project i.e. Can they sign up to a	The website would include a mechanism whereby members of the public could sign up to receive regular updates. Members of the public would also be able to be added to the mailing list by providing

Ref	LB Enfield comment	Applicant response
	register or should they refer to the website or infrastructure planning web.	their details via the phone, post or e-mail. The SoCC has been updated to clarify this. As stated in the SoCC the people living in the newsletter zone would receive newsletters.
h)	Jo raised at the meeting that it would be useful to include links to LVHN website for further info on this – although I am not sure this needs to be stated in a formal response.	It was not appropriate to include a link to the LVHN in the SoCC as this is a separate Project which does not form part of the Application ⁴ .
i)	In addition, confirmation was being sought that the consultation material would be made available in a range of languages and formats to reach various groups that comprise Enfield's community	The need for making consultation materials available in a range of languages and formats was discussed with LB Enfield Head of Communications. Information would be available in other formats and local languages if required. A statement to this effect was added to the SoCC.

2.5.10 Section 47(2) requires applicants to consult all local authorities in whose area the land is situated on the draft SoCC. The land is situated wholly within LB Enfield and it was consulted on the draft SoCC pursuant to section 47(2). In addition, the Applicant also informally consulted LB Waltham Forest and LB Haringey.

2.5.11 Regulation 10 of the EIA Regulations requires that the SoCC sets out whether the proposed application relates to EIA development and how the applicant intends to publicise and consult on the preliminary environmental information. The final draft of the SoCC complied with this regulation.

Notification and publicity of the Statement of Community Consultation

2.5.12 Applicants are required to publish in a newspaper circulating in the vicinity of the land a notice stating where and when the SoCC can be inspected (section 47(6)(a)). A notice was published in the Enfield Independent on 26 November 2014, and a copy can be found in Appendix C1. A copy of the SoCC is included in Appendix A3.

2.5.13 Section 47(6)(za) of the Planning Act 2008 (as amended) sets out the need to make the SoCC “*available for inspection by the public in a way that is reasonably convenient for people living within the vicinity of the land.*” The SoCC was made available on the Project website from 20 November 2014. Printed copies were available at the Phase One and Phase Two Consultation exhibitions (details of which are set out in Sections 3 and 5) and were also available upon request. Copies were made available at the following locations for the duration of both Phase One and Phase Two Consultation:

- a. Edmonton Green Library, 36-44 South Mall, London, N9 0TN;
- b. Green Towers Community Centre, 7 Plevna Road, Edmonton, London, N9 0BU;

⁴ Details of the LVHN website was subsequently included in one of the Phase One exhibition boards and in the consultation booklet. The website also included a link to the LVHN website. LB Enfield was also invited to send a representative to attend the exhibitions on behalf of the LVHN.

- c. South Chingford Community Library, 265 Chingford Mount Rd, London E4 8LP;
- d. Coombes Croft Library, High Rd, White Hart Lane, London, N17 8AD; and
- e. Civic Centre, London Borough of Enfield, Silver Street, Enfield, London, EN1 3XA.

2.5.14 All section 42 consultees were provided a copy of the SoCC.

Compliance with the Statement of Community Consultation

2.5.15 Applicants are required by section 47(7) of the Planning Act 2008 (as amended) to carry out consultation of people living within the vicinity of the land in accordance with the proposals set out in the SoCC.

2.5.16 The SoCC was adhered to throughout the course of pre-application consultation with respect to section 47 consultees. Table 2.3 sets out the commitments made in the SoCC and how they have been complied with.

Table 2.3: SoCC compliance

	SoCC commitment	Compliance
a)	Undertake an Environmental Impact Assessment (EIA) which will accompany the application for development consent.	The EIA is reported in the ES (AD06.02), submitted with the Application.
b)	Publish Preliminary environmental information report as part of Phase Two public consultation and invite comments on the environmental and amenity effects of the proposal that it identifies.	The Preliminary Environmental Information Report was available on the Project website and at the exhibitions throughout Phase Two Consultation (see Section 5.4 for more detail).
c)	Hold Phase One public consultation from 28 November 2014 to 27 January 2015.	Phase One Consultation was held from 28 November 2014 to 27 January 2015 (see Section 3 for more detail).
d)	Hold Phase Two public consultation for 6 weeks, starting in May 2015.	Phase Two Consultation was held for a period of 6 weeks and 2 days from 18 May to 30 June 2015 (see Section 5 for more detail).
e)	Prior to formal submission publicise the proposed application in accordance with the requirements of the Planning Act 2008 and the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.	Publicity was undertaken in accordance with section 48 of the Planning Act 2008 (as amended) between 18 May 2015 and 30 June 2015 for a period of 6 weeks and 2 days (see Section 5.4 for more detail).
f)	If material changes and/or changes which would affect the nature of the comments received from the public during the relevant consultation are made following consultation undertake further targeted consultation. This would comprise public exhibitions and provision of project information, and would be for a period of not less than 28 days.	No material changes or changes which would affect the nature of the comments received from the public were made, and so it was not appropriate or necessary to undertake further targeted consultation.

	SoCC commitment	Compliance
	Give 14 days' notice through the publishing of local adverts and provision of information on the website.	
g)	Seek comments on the need for the proposed development during Phase One Consultation.	Information about the need for the project was provided. Question 1 asked "What are your views on our proposal for a new facility to replace the existing plant at the Edmonton EcoPark?". Of comments received in response to this question, the majority related to the need for the facility (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
h)	Seek comments on initial ideas on the appearance of the new facility, including the possible design of the stack and landscaping during Phase One Consultation.	Information on initial design ideas, options for the stack and landscaping were provided. Question 2 asked "What are your views on landscaping, design and appearance of our proposal for the EcoPark?" (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
i)	Seek comments on potential environmental considerations including the approach to emissions control and health impacts during Phase One Consultation.	Potential environmental considerations were presented and Question 3 asked "Do you have any particular concerns and/or interests in relation to potential environmental effects? If so, what are they?" (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
j)	Seek comments on the approach to traffic management during Phase One Consultation.	Information on the potential traffic impacts and proposed management was provided. Question 6 asked "What do you think is important for us to consider with regard to traffic associated with our proposed facility?" (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
k)	Seek comments on the approach to construction during Phase One Consultation.	Information about construction and demolition was provided. Question 7 asked "What would you like us to take into consideration when we plan for the construction of the proposed facility and demolition of the existing plant?" (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
l)	Seek comments on the proposed visitor centre during Phase One Consultation.	Information about the proposed visitor centre was provided. Question 8 asked "What are your views on us providing a visitor centre as part of our proposal and what facilities do you think should be included?" (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
m)	Seek comments on the proposed approach to community benefits during Phase One Consultation.	Question 9 asked "Do you have any suggestions for what would help in the local area with regard to our proposal and the construction period? If so, please describe them." (see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).
n)	Seek comments on the consultation process during Phase One Consultation.	The following questions were asked during Phase One Consultation: 10a. What do you think about the information we have provided during this phase of consultation?

	SoCC commitment	Compliance
		<p>10b. What more information do you think we could provide?</p> <p>10c. Do you have any comments on how we could improve your experience for our next phase of consultation?</p> <p>(see Appendix D6 for a list of the information provided, and questions asked at Phase One Consultation).</p>
o)	During Phase Two Consultation seek comments on the detailed proposals for the site, which take into account the results of Phase One Consultation and further technical work.	More detailed information on the proposals was provided during Phase Two Consultation. Respondents were encouraged to comment on any aspect of the Project, and specific questions were asked on the following aspects: Preliminary Environmental Information, design principles and external appearance of buildings, landscaping, cooling system, site access, the Temporary Laydown Area, traffic, water transport, construction and the visitors centre. Section 5.3 sets out what was consulted on at Phase Two Consultation.
p)	During Phase Two Consultation seek comments on the effects of the project as reported in the Preliminary environmental information report.	The Preliminary Environmental Information Report was published as part of Phase Two Consultation. Question 2 asked "Do you have any comments on the information provided in the Preliminary Environmental Information Report?" (see Appendix E7 for a list of the information provided, and questions asked at Phase Two Consultation).
q)	<p>Consult the following groups on the proposal:</p> <ol style="list-style-type: none"> 1. People in the vicinity, including the general public, property owners/occupiers, businesses, community representatives and groups. 2. Statutory consultees, including local authorities, other statutory authorities and pan-London strategic stakeholders, such as Transport for London. These will include London Borough of Enfield as the local authority within which the Edmonton EcoPark is situated, and all adjoining borough and district councils. 3. People whose land may be directly affected by the proposed development. 	<ol style="list-style-type: none"> 1. All properties within the section 47 Consultation Zone/Newsletter Zone were notified about both phases of Consultation by newsletters delivered through their door. This Zone was at least a 1,500m radius from the centre of the Edmonton EcoPark. The consultation was also advertised in local newspapers, on local radio and with posters. Local community groups were also contacted. Refer to Sections 3.2 and 5.2 for more information. 2. All statutory consultees identified in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) were notified of both phases on Consultation by a letter. Copies of these letters are included in Appendix C2. 3. Detailed title investigations were undertaken to identify all landowners, and they were sent a letter notifying them of both phases of consultation. Notices were also erected in the vicinity of the Edmonton EcoPark. Refer to Sections 3.2 and 5.2 for more information.
r)	Advertise the consultation in all of the NLWA's Constituent Boroughs, and provide information directing residents and local businesses to the Project website throughout the area. Notify Members in all seven boroughs in advance of the start of the consultation.	<p>Phase One was advertised in the council papers of the seven NLWA Constituent Boroughs which are delivered to all properties in each borough, these directed the reader to the consultation website. Details for Phase One Consultation are set out in Table 3.3.</p> <p>Phase Two Consultation was advertised in six of the seven NLWA's Constituent Borough papers as set out in Table 5.4. It was not possible to include an advert in the Islington Council paper during Phase Two Consultation as the paper was not published during this</p>

	SoCC commitment	Compliance
		<p>period. It was also published in the Islington Gazette. Refer to Sections 3.2 and 5.2 for more information.</p> <p>NLWA Members (who represent all seven Constituent Boroughs) and Members of wards within the section 47 zone/newsletter zone were notified in advance of both phases of Consultation.</p>
s)	<p>Use the following methods to consult:</p> <ol style="list-style-type: none"> 1. Consultation website: provide information on the project and a dedicated point for comments and feedback on the project website. 2. Community briefings: offer community representatives a briefing on the project alongside the public exhibitions. 3. Community Liaison Group: look to set up a Community Liaison Group consisting of local councillors, and local community group leaders will be invited to take part. 4. Project information: Throughout phase one and two consultations provide written information about the project. Make information available on the website and at public exhibitions. Make leaflets promoting the consultation available at local libraries and other community points. 5. Leafleting: send a leaflet to everyone living within 1,500m of the boundary of the Edmonton EcoPark notifying them of the proposals and encouraging them to provide feedback in response to consultations. 6. Telephone line: operate a dedicated telephone line for questions. 7. Programme of public exhibitions: hold public exhibitions in the vicinity of the EcoPark. 	<ol style="list-style-type: none"> 1. A consultation website has been live since the start of Phase One Consultation: http://www.northlondonheatandpower.london. Refer to paragraphs 3.4.38 and 5.4.33 2. Community briefings were held with the following community groups during Phase One Consultation: <ul style="list-style-type: none"> Local Waltham Forest Members (with wards in the vicinity); South East Enfield Partnership; West Enfield Partnership; and Jubilee Ward Area Forum. Briefings were held with the following during Phase Two Consultation: <ul style="list-style-type: none"> Elders group; Bountagu Residents' Association; and Residents of Angel Community Together (REACT). Refer to paragraphs 3.4.43 and 5.4.42 for more information. 3. The Applicant looked to set up a Community Liaison Group, however discussions with Members suggested that this would be more useful later in the process. Therefore a Community Liaison Group was not established however local councillors and local community group leaders were consulted throughout the preparation of the Application. 4. Written information was available during both phases of Consultation at the exhibitions, community points and on the Project website. Leaflets promoting the Consultation were available at local libraries and other community points. Refer to paragraphs 3.4.27 and 5.4.24 for more information. 5. Newsletters were delivered to all properties within a zone extending at least 1,500m of the boundary of the Edmonton EcoPark notifying them of the proposals and encouraging them to provide feedback in response to the Consultation. The zone in which newsletters were delivered is illustrated on Figure 3.2. Two newsletters were delivered during Phase One Consultation and one newsletter was delivered during Phase Two Consultation. Copies of these newsletters are included in Appendix D4 and Appendix E5. 6. A dedicated phone line was operational throughout the formal Consultation periods. 7. Public exhibitions during Phase One Consultation were held on 5, 6 & 8 December 2014; and 14, 15, 17, 22 January 2015. Public exhibitions during Phase Two Consultation were held on 3, 5, 6, 9, 10, 11, 12 & 13 June 2015. Refer to paragraphs 3.4.41 and 5.4.40

	SoCC commitment	Compliance
t)	After each phase of consultation produce a Feedback Report which records all feedback received and explains how responses have been taken into account. Make Feedback Reports available on the project website. These feedback reports are to form the basis of the consultation report that is to be submitted as part of the application for a DCO.	<p>The Phase One Consultation Feedback Report summarises the comments received during Phase One Consultation and the Project's response to comments. This Report was published as part of Phase Two Consultation.</p> <p>The comments raised during Phase Two Consultation and the Project's response to them are summarised in Section 6 of this Report. A separate Feedback Report has not been produced for Phase Two Consultation as this would unnecessarily duplicate the contents of this report.</p>

2.5.17 The SoCC stated that the Applicant would look to set up a Community Liaison Group comprising local councillors and local community group leaders. Following discussion with local Members it was agreed not to establish a Community Liaison Group. It was considered that there would be insufficient local interest to do so. A Community Liaison Group was therefore not set up. Nevertheless, consultation with the public, councillors and community groups has been extensive, and feedback received during both phases of consultation indicates that consultees were satisfied with the level of engagement. The decision not to establish a Community Liaison Group at this time was also discussed and agreed with LB Enfield.

2.5.18 Additional outreach methods, such as mobile information vehicles, posters at railway stations and pop-up information stands were undertaken, and further details are contained in section 5 of this report. This was to react to comments raised in Phase One consultation.

2.6 Summary of phases of consultation

2.6.1 A phased approach was used to balance between early engagement and having proposals that are firm enough to enable consultees to comment. Table 2.4 outlines the programme of pre-application Consultation undertaken.

Table 2.4: Programme of consultation

Consultation activity	Date	Further information
Statutory consultation		
Statement of Community Consultation	Draft circulated 14 October 2014 Comments received from LB Enfield on 11 November 2014 Notice of the SoCC published in the Enfield Independent 26 November 2014	Section 2.5 outlines the process undertaken in the development and publication of the SoCC. The final version of the notice of the SoCC, as published in the Enfield Independent, is included in Appendix C1 and the SoCC itself can be found in Appendix A3.
Phase One Consultation	28 November 2014 to 27 January 2015 Public exhibitions held on 5, 6 & 8 December 2014; and 14, 15, 17, 22 January 2015.	Section 3 outlines in more detail the pre-application consultation process. Sections 3.2 to 3.4 give a detailed summary of the Phase One Consultation with regard to where, how, whom and on what we consulted. Section 4 outlines the comments received during Phase One Consultation and the Applicant's response to these.
Phase Two Consultation /section 48 Publicity	18 May 2015 to 30 June 2015 Public exhibitions held on 3, 5, 6, 9, 10, 11, 12 & 13 June 2015.	Section 5 outlines in detail the pre-application consultation process at Phase Two. Sections 5.2 to 5.4 give a detailed summary of the Phase Two Consultation with regard to where, how, whom and on what we consulted. Section 5.5 provides details of the section 48 consultation undertaken. Section 6 outlines the comments received during Phase Two Consultation and the Applicant's response to these.
Informal (non-statutory) Consultation		
Pre-application discussions with local authorities	Ongoing from May 2014 – September 2015	Section 7 gives more detail on informal engagement undertaken throughout the pre-application period. LB Enfield, LB Waltham Forest and LB Haringey were all consulted informally on the Project.
Pre-application discussions with section 42 consultees	Ongoing from May 2014 – September 2015	Section 7 gives more detail on informal engagement throughout the pre-application period. The following organisations were consulted informally: Environment Agency, Transport for London, Greater London Authority, Lee Valley Regional Park Authority, the Historic Buildings and Monuments Commission for England and Natural England.

3 Phase One Consultation process

3.1 Introduction

3.1.1 This Section sets out how statutory pre-application consultation was undertaken for Phase One Consultation. It sets out:

- a. whom the Applicant consulted;
- b. what the Applicant consulted on;
- c. how the Applicant undertook pre-application consultation; and
- d. the approach to analysis.

3.1.2 Phase One Consultation ran from 28 November 2014 to 27 January 2015, for a period of 61 days. Consultees falling within section 47 and section 42 of the Planning Act 2008 (as amended) were consulted.

3.1.3 The proposals for the purposes of Phase One Consultation covered the area of land edged red on Figure 3.1.



Figure 3.1: Extent of proposals for the purposes of Phase One Consultation

- 3.1.4 Section 46 of the Planning Act 2008 (as amended) requires that on or before commencing consultation under section 42, applicants notify the SoS of their intent to submit an application for a DCO and to provide the SoS with the same consultation material that will be provided/is provided to section 42 consultees. A section 46 notice of Phase One Consultation was sent by the Applicant to the Planning Inspectorate by letter on 19 November 2014. The section 46 notice also enclosed copies of the same consultation material that was later sent to section 42 consultees for Phase One Consultation on 25 November 2014. A copy of the letter sent to the SoS pursuant to section 46 is contained in Appendix C5. That letter lists all the consultation materials sent to the SoS for Phase One Consultation.

3.2 Whom we consulted

- 3.2.1 In accordance with sections 42 and 47 of the Planning Act 2008 (as amended) and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) the Applicant consulted with the following consultees:
- a. prescribed consultees (section 42(1)(a) and APFP Regulations 2009);
 - b. local authorities (section 42(1)(b) and section 43);
 - c. the Greater London Authority (section 42(1)(c));
 - d. 'Land Interests' - persons who fall within one or more of the categories of section 44 (section 42(1)(d); and
 - e. the local community (section 47).
- 3.2.2 Whilst not a requirement under the Planning Act 2008 (as amended), the Applicant also consulted all the parties on the list of consultees it received from the Planning Inspectorate pursuant to Regulation 9(1)(c) of EIA Regulations (Regulation 9 List of EIA Consultees). A copy of the Regulation 9 List of EIA Consultees is attached at Appendix B4.
- 3.2.3 Informal non-statutory engagement also took place before and during Phase One Consultation. Please see Section 7 of this report for further information.

Statutory consultation in accordance with section 42(1)(a) of the Planning Act 2008 (as amended) - Prescribed Consultees

- 3.2.4 Section 42(1)(a) of the Planning Act 2008 (as amended) requires applicants to consult with certain prescribed persons on their proposals. For the purposes of this report, prescribed persons are referred to as prescribed consultees. Appendix B1 and B2 to this report contains a list of the prescribed consultees consulted during Phase One Consultation.
- 3.2.5 The following steps were taken by the Applicant to identify the relevant prescribed consultees for Phase One Consultation:
- a. prescribed consultees are, for the purposes of section 42(1)(a), listed in Schedule 1 of the APFP Regulations 2009 (Schedule 1). Schedule 1 also sets out the circumstances in which a prescribed consultee is to be consulted. For example, whereas the Environment Agency must be

consulted in all NSIP cases, the Office of Rail Regulation must be consulted only on proposed applications which are likely to affect the rail transport industry. The Applicant used Schedule 1 to identify the relevant prescribed consultees for Phase One Consultation. The version of Schedule 1 relied on by the Applicant to identify these prescribed consultees is the version that predates the current version of Schedule 1 (the current version of Schedule 1, in force at the time of writing this report, incorporates amendments to prescribed consultees introduced by The Infrastructure Act 2015 (Strategic Highways Companies) (Consequential, Transitional and Savings Provisions) Regulations 2015 (the 2015 Regulations)⁵.

- b. some prescribed consultees in Schedule 1 were not relevant to the proposals that were the subject of Phase One Consultation, these are listed in Table 3.1, with an explanation as to why the Applicant did not consider each one relevant (based on the reasons set out in Column 2 of Schedule 1).

Table 3.1: Prescribed consultees not consulted

Prescribed consultee not consulted	Explanation
The relevant Health Board	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect land in Scotland. As the proposals do not affect land in Scotland, this entity was not considered to be a relevant prescribed consultee.
The relevant parish council, or, where the applications relates to land Wales or Scotland the relevant community council	There is no relevant parish council relating to the land that is the subject of the proposals. Column 2 of Schedule 1 only requires community councils to be consulted for proposed applications likely to affect land in Scotland or Wales. As the proposals do not affect land in Scotland or Wales, community councils were not considered to be a relevant prescribed consultee.
Relevant AONB Conservation Boards	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect an AONB that is managed by a conservation board. As there are no such areas within the vicinity of the land to be affected by the proposal, this entity was not considered to be a relevant prescribed consultee.
The Relevant Internal Drainage Board	There is no relevant internal drainage board for the land that is the subject of the proposals.

⁵ The version of Schedule 1 of the APFP Regulations 2009 the Applicant relied on to identify prescribed consultees for the purposes of Phase One Consultation incorporated amendments made by the following: the Passengers' Council (Non-Railway Functions) Order 2010; the Local Democracy, Economic Development and Construction Act 2009 (Consequential Amendments) (England) Order 2010; the British Waterways Board (Transfer of Functions) Order 2012; the Local Policing Bodies (Consequential Amendments No. 2) Regulations 2012; the Infrastructure Planning (Prescribed Consultees and interested Parties etc) (Amendment) Regulations 2013; and the Energy Act 2013 (Office for Nuclear Regulation) (Consequential Amendments, Transitional Provisions and Savings) Order 2014.

Prescribed consultee not consulted	Explanation
Office for Nuclear Regulation (the ONR)	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect matters relevant to the ONR's purposes within the meaning of Part 3 of the Energy Act 2013 (as indicated at section 67 of that Act). The proposals do not relate to those purposes and ONR was therefore not considered to be a relevant prescribed consultee.
The relevant local health board	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect land in Wales. As the proposals do not affect land in Wales, this entity was not considered to be a relevant prescribed consultee.
The National Health Service Trusts	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect land in Wales. As the proposals do not affect land in Wales, this entity was not considered to be a relevant prescribed consultee. The relevant NHS Trusts in England were however consulted.
The Relevant Northern Ireland Department – the Department of the Environment in Northern Ireland	Column 2 of Schedule 1 only requires this entity to be consulted if the application is likely to affect land in Northern Ireland. As the proposals do not affect land in Northern Ireland, this entity was not considered to be a relevant prescribed consultee.
The relevant strategic highways company	The annexure to Advice Note 3 only requires this entity to be consulted if the application is likely to affect road or transport operation and/or planning on roads for which Highways England is the highways authority. As the proposals do not affect the roads for which Highways England is the highway authority, this entity, was not considered to be a relevant prescribed consultee. However, Highways England was consulted in Phase Two on a voluntary basis.

3.2.6 Paragraph 28 of the Statutory Guidance (March 2015 edition) states:

"From time to time a body may cease to exist but, for legislative timetabling reasons, may still be listed as a statutory consultee. In such situations the Secretary of State will not expect strict compliance with the statutory requirements. Applicants should identify any successor body and consult with them in the same manner as they would have with the original body. Where there is no obvious successor, applicants should seek the advice of the Inspectorate, who may be able to identify an appropriate alternative consultee. Whether or not an alternative is identified, the consultation report should briefly note any cases where compliance with statutory requirements was impossible and the reasons why."

3.2.7 When identifying prescribed consultees for the purposes of Phase One Consultation, the Applicant identified some prescribed consultees who were either known by another name/changed their name/were no longer in existence. These prescribed consultees are identified in Table 3.2.

Table 3.2: Prescribed consultees that changed name/were no longer in existence

Prescribed consultee	Explanation	Consulted under section 42(1)(a)?
The National Health Service Commissioning Board	The National Health Servicing Commissioning Board has adopted the name NHS England since 1 April 2013. The responsibilities of The National Patient Safety Agency and The National Treatment Agency (both of which are prescribed consultees pursuant to section 42(1)(a) of the Planning Act 2008 (as amended), were transferred to NHS England on 1 June 2012.	NHS England was consulted as a section 42(1)(a) consultee for the purposes of Phase One Consultation.
NHS Institute for Development and Innovation	Since 1 April 2013, the responsibilities of the NHS Institute for Development and Innovation were transferred to NHS Improving Quality (part of NHS England).	NHS Improving Quality was consulted as a section 42(1)(a) consultee for the purposes of Phase One Consultation.
The British Waterways Board	The British Waterways Board was abolished on 2 July 2012 and its powers relating to inland waterways were transferred to the Canal & River Trust.	The Canal & River Trust was consulted as a section 42(1)(a) consultee for the purposes of Phase One Consultation.
The Historic Buildings and Monuments Commission for England	Also known as English Heritage	English Heritage was consulted as a section 42(1)(a) consultee for the purposes of Phase One Consultation.

3.2.8 The identified prescribed consultees for Phase One Consultation is listed in Appendix B1 and B2.

Statutory consultation in accordance with section 42(1) (aa) of the Planning Act 2008 (as amended) - the Marine Management Organisation (MMO)

3.2.9 The proposals that were the subject of Phase One Consultation did not affect and were not likely to affect any of the areas listed within section 42(2) of the Planning Act 2008 (as amended) that would make it necessary to consult the MMO. Nevertheless, the Applicant wrote to the MMO on 25 November 2014 notifying them that, in the opinion of the Applicant, the Application did not concern the MMO but requested the MMO to reply to confirm that it agreed to not be consulted. No response from the MMO was received.

Statutory consultation in accordance with section 42(1)(b) of the Planning Act 2008 (as amended) – Local Authorities

3.2.10 Section 42(1)(b) of the Planning Act 2008 (as amended) requires that local authorities that fall within the categories listed in section 43 are consulted.

- 3.2.11 Section 43 of the Planning Act 2008 (as amended) lists four categories of local authority that need to be consulted, which are⁶:
- a. Category A – neighbouring local authorities that share a boundary with a unitary council or lower tier district council within whose area development is situated;
 - b. Category B – either a unitary council or a lower tier district council in which the development is situated – a host authority;
 - c. Category C – an upper-tier county council in which the development is situated – a host authority; and
 - d. Category D – either a unitary county council or an upper tier county council which shares a boundary with a host 'C' authority – a neighbouring authority.
- 3.2.12 The proposals that were the subject of Phase One Consultation covered land that was located solely within LB Enfield. The Applicant's Category B local authority was therefore LB Enfield for the purposes of Phase One Consultation.
- 3.2.13 The local authorities sharing a boundary with LB Enfield and therefore the Applicant's Category A local authorities for the purposes of Phase One Consultation were:
- a. London Borough of Barnet;
 - b. London Borough of Waltham Forest;
 - c. London Borough of Haringey;
 - d. Epping Forest District Council;
 - e. Hertsmere Borough Council;
 - f. Broxbourne Borough Council;
 - g. Welwyn Hatfield Borough Council;
 - h. Essex County Council; and
 - i. Hertfordshire County Council.
- 3.2.14 Hertfordshire County Council shares a boundary with LB Enfield, and was consulted at Phase One, however the Applicant is unable to provide evidence of posting to this effect. Hertfordshire County Council was consulted at Phase Two Consultation and the Planning Inspectorate consulted the County Council in respect of the EIA scoping under Regulation 9(1)(a) of the EIA Regulations. Therefore the County Council was aware of the proposals through the EIA scoping consultation and was able to engage through Phase Two Consultation.
- 3.2.15 As mentioned above, a local authority is a Category C local authority (and must be consulted) if it is an upper-tier county council and the land that is the subject of the application is within that local authority's area. There were no Category C local authorities relevant to Phase One Consultation as there

⁶ See page 4 of Advice Note 2: The role of local authorities in the development consent process (February 2015)

are no upper-tier county councils whose areas included the land that was the subject of Phase One Consultation. An upper-tier county council is defined⁷ as a county council in England for each part of whose area there is a district council. This definition does therefore not include the Greater London Authority (with whom consultation is required pursuant to section 42(1)(c) Planning Act 2008 (as amended) (see below)), as the Greater London Authority's administrative area is not split into district council administrative areas. Accordingly the applicant did not consult any Category C local authorities in respect of Phase One Consultation.

3.2.16 Section 43 (2A) Planning Act 2008 (as amended) states that a local authority is a Category D local authority (and must be consulted) if it is not a lower-tier authority and shares a boundary at any point with a Category C local authority. As there are no Category C local authorities, there were no relevant Category D local authorities to consult in respect of Phase One Consultation.

3.2.17 The plan at Appendix B3 shows the location of each Category A and Category B local authority.

Statutory consultation in accordance with section 42(1)(c) of the Planning Act 2008 (as amended) – the Greater London Authority

3.2.18 Section 42(1)(c) of the Planning Act 2008 (as amended) requires the GLA to be consulted for projects on land in Greater London. The area of land affected by the proposals subject to Phase One Consultation is located within LB Enfield, the GLA was therefore consulted by the Applicant. For the purposes of this report the GLA is reported as a prescribed consultee.

3.2.19 The lists of Phase One Consultation consultees at Appendix B1 and B2 include the GLA as a section 42(1)(c) consultee.

Statutory consultation in accordance with section 42(1)(d) of the Planning Act 2008 (as amended) – Land Interests

3.2.20 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.

3.2.21 Section 44 sets out three categories of persons that must be identified and consulted as follows:

- a. Category 1: If the applicant, after making diligent inquiry, knows that the person is an owner, lessee, tenant (whatever the tenancy period) or occupier of the land;
- b. Category 2: If the applicant, after making diligent inquiry, knows that the person (a) is interested in the land, or (b) has power to i) sell and convey the land, or ii) to release the land; and
- c. Category 3: If the applicant, after making diligent inquiry, believes that, if the order sought for the project were to be made and fully implemented, the person would or might be entitled a) as a result of implementing of the order, b) as a result of the order having been

⁷ Section 43(3) of the Planning Act 2008 (as amended).

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 Part 1 of the Land Compensation Act 1973 for depreciation in value of land by physical factors caused by the use of public works; or (iii) a claim under section 152(3) of the Planning Act 2008 (as amended).

- 3.2.22 These persons are collectively referred to as 'Land Interests' for the purpose of this report.
- 3.2.23 Land Interests for the area of land relating to Phase One Consultation were identified well in advance of the commencement of Phase One Consultation through a process of diligent inquiry and detailed title investigations, in order to satisfy: (i) both the statutory consultation requirements; and (ii) the compulsory acquisition needs of the proposals consulted on; and (iii) eventually what would be in the Application.
- 3.2.24 This began with the submission of plans of the relevant area of land being consulted about during Phase One (please see the land edged red on Figure 3.1), to the Land Registry and procuring land ownership information, including official copies of all title registers, title plans and underlying documents filed at the Land Registry.
- 3.2.25 Searches relating to utilities, highways, and a local authority search were also carried out in advance of the commencement of Phase One Consultation.
- 3.2.26 Having obtained the necessary information, further detailed title investigations were undertaken to further identify all interests noted against the title in each case.
- 3.2.27 Notices were erected in prominent positions at locations of unknown land ownership. The notices included plans delineating the extent of the unknown ownership. They were first erected on 21 November 2014 and were checked daily until 21 December 2014. Those notices were then checked weekly from 21 December 2014 until 11 May 2015 when they were taken down. Photographs were taken of the notices erected and a log was kept of when the notices were checked. A selection of the photographs taken are enclosed within Appendix C3.
- 3.2.28 The area determined by the Applicant as the section 47 consultee zone/newsletter zone took into account all local interests, and so Category 3 owners were sent the same materials as all section 47 consultees. These materials directed all recipients to the full set of consultation materials for both phases of consultation. In this way, all Category 3 owners were given full access to all the consultation materials during both phases of consultation. The size of the section 47 consultation zone/newsletter zone was set at such a size that the Applicant reasonably considered that it would include those property interests, the owner of which would fall into Category 3. However, some Category 3 persons lived/have their registered office address outside the section 47 consultation zone/newsletter zone

notwithstanding that the relevant property interest was within it. As such, those Category 3 Owners were each sent a section 42 letter on 25 November 2014.

- 3.2.29 Appendix B12 sets out the Land Interests consulted at Phase One Consultation.

Statutory consultation in accordance with section 47 of the Planning Act 2008 (as amended) – local community

- 3.2.30 Under section 47 of the Planning Act 2008 (as amended), an applicant must consult people living in the vicinity of the land that is the subject of the application. These persons are collectively referred to as ‘the local community’ for the purpose of this report.
- 3.2.31 Section 47(7) of the Planning Act 2008 (as amended) requires that consultation of the local community must be carried out in accordance with the proposals set out in the SoCC. Under the SoCC, the local community included all people living in the vicinity of the proposed Application Site for the purposes of Phase One Consultation, including the general public, property owners and occupiers, local businesses, community representatives and groups, and people whose land may be directly affected by the proposals.
- 3.2.32 Local community consultees were consulted at Phase One Consultation.
- 3.2.33 A section 47 consultee zone/newsletter zone of at least 1,500m from the centre of the Edmonton EcoPark was defined and used for Phase One Consultation. A distance of 1,500m was selected, as beyond this distance it was not anticipated that there would be any likely significant environmental effects from the Project, and it was anticipated that this extent of local consultation would include all those who could be affected by the Project. All properties within the 1,500m of the centre of the Edmonton EcoPark were included in the section 47 consultee zone/newsletter zone. Additional areas outside the 1,500m radius were included where a more natural boundary occurred, e.g. the end of a road or a road junction. The aim was to avoid a situation where part of a street received a newsletter but the rest did not. This was the most robust approach to ensure that all properties within the 1,500m radius were included. The newsletter zone includes 28,779 properties and 20 schools. Figure 3.2 illustrates the section 47 consultee/newsletter zone.

Regulation 9 of the EIA Regulations

- 3.2.34 Refer to Section 2.4 for details of consultation under the EIA Regulations.
- 3.2.35 A copy of the Regulation 9 List received from the SoS is contained within Appendix B4. The list of those consulted during Phase One Consultation that is contained within Appendices B1 and B2 include all those persons on the Regulation 9 List.

Notifying the Secretary of State

- 3.2.36 Section 46 of the Planning Act 2008 (as amended) requires that on or before commencing consultation under section 42, applicants must notify

the SoS of their intent to submit an application for a DCO and to provide the SoS with the same consultation material that will be provided/is provided to section 42 consultees. A section 46 notice of Phase One Consultation was sent by the Applicant to the Planning Inspectorate by letter on 19 November 2014.

- 3.2.37 A copy of the section 46 Notice is provided in Appendix C5 and was accompanied by the same consultation materials that were sent to all section 42 consultees in soft copy in relation to Phase One Consultation.

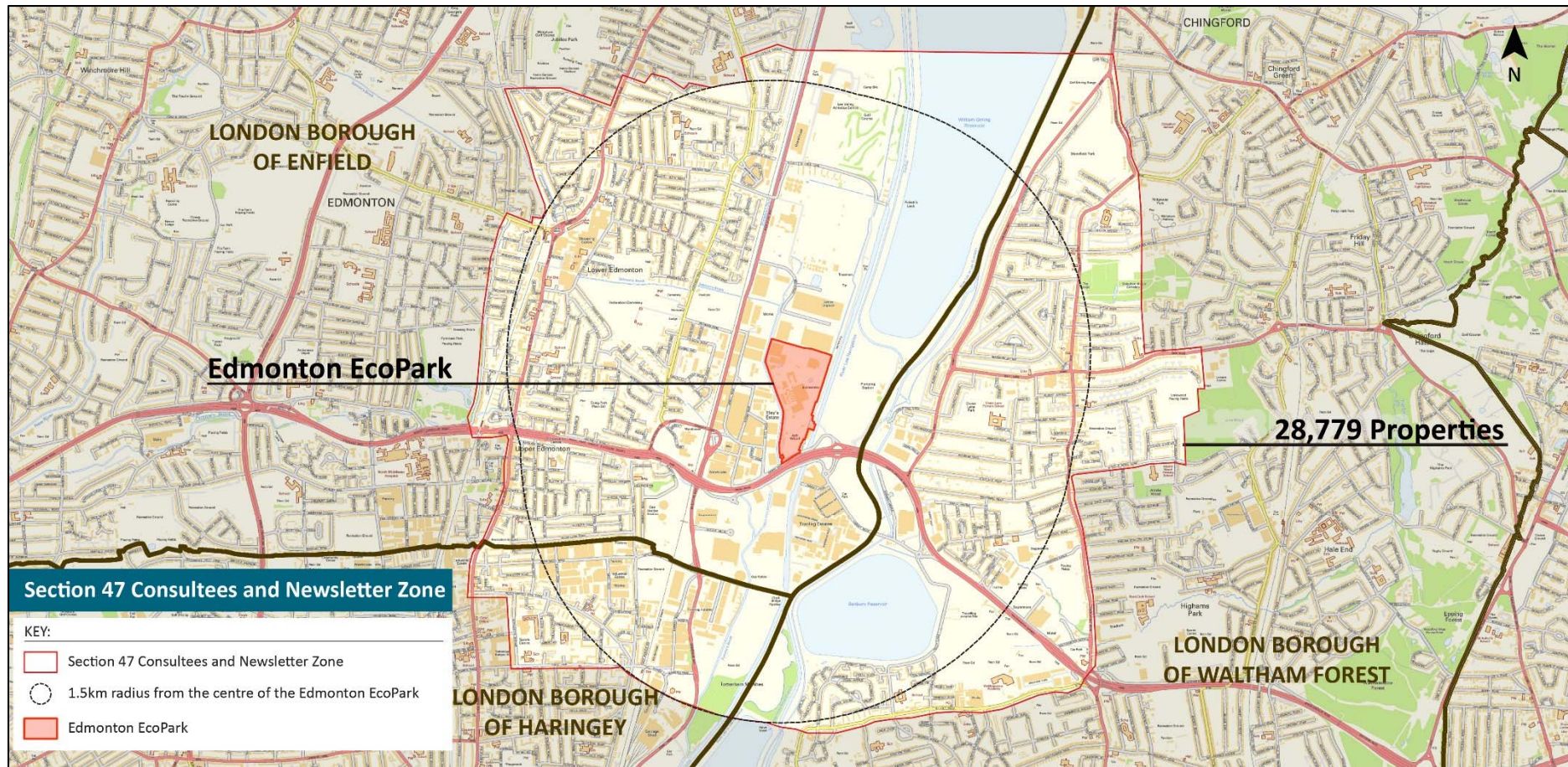


Figure 3.2: Section 47 consultation zone/newsletter zone

3.3 What we consulted section 42 and 47 consultees on

- 3.3.1 Phase One Consultation gave all section 42 and section 47 consultees an early opportunity to comment on the initial proposals for the Project. High level information on the emerging proposals was provided including:
- a. overview of the role of NLWA;
 - b. the planning policy context for the Project;
 - c. the proposed Application Site's constraints which have informed the proposal, size and shape of the ERF;
 - d. initial approach to the design of the ERF and stack;
 - e. proposed Application Site layout,
 - f. proposed approach to landscaping;
 - g. approach to assessing the potential environmental effects;
 - h. waste modelling;
 - i. the waste challenge facing London today;
 - j. information about construction and traffic;
 - k. emissions and their potential impact on human health; and
 - l. information about the consultation and DCO process.
- 3.3.2 The consultation materials were made available to all section 42 and 47 consultees. Information was available at public exhibitions, on the website. Information was also available in hard or soft (on a memory stick) copy by post on request. During Phase One Consultation exhibitions the Applicant did not receive any requests for written information.
- 3.3.3 All consultation materials were sent to all section 42 consultees (on a memory stick) and the SoS pursuant to section 46 of the Planning Act 2008 (as amended). The SoS was additionally provided the likely form of letter to section 42 consultees because the SoS was sent these consultation materials in advance of them being sent to the section 42 consultees.
- 3.3.4 The consultation materials for Phase One Consultation comprised:
- a. Background documents:
 - Statement of Community Consultation and section 47(6) notice
 - b. Information documents:
 - Consultation Booklet (including feedback questions)
 - Newsletter: Issue 1⁸
 - Advertisements
 - Leaflets
 - Business Cards

⁸ Note a Newsletter: Issue 2 was subsequently published during Phase One Consultation. This was delivered to all properties in the newsletter zone and copies were available at the exhibitions.

c. 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

d. 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
- Vicinity Plan

3.3.5 During Phase One Consultation comments were sought from all section 42 and 47 consultees on:

- a. the need for the proposed development;
- b. initial ideas on the appearance of the proposed ERF and wider proposals, including the possible design of the stack and landscaping;

- c. potential environmental considerations including the approach to emissions control and health impacts;
- d. the approach to traffic management;
- e. the approach to demolition and construction;
- f. the proposed visitor centre;
- g. the proposed approach to community benefits;
- h. the choice of cooling system for the ERF; and
- i. the consultation process.

3.3.6 A copy of the consultation booklet, newsletters, leaflets, advertisements and business cards can be found in Appendix D8, D4, D5, D2, and D7 respectively.

3.4 How we consulted

3.4.1 A variety of consultation methods were used as part of the Phase One Consultation as summarised below. The approach set out in the SoCC was followed when consulting section 47 consultees.

Letters to section 42 consultees

3.4.2 Letters of notification of Phase One Consultation were sent to all the section 42 consultees listed in Appendices B1 and B2 on 25 November 2014 (section 42 letters). The section 42 letters were sent to section 42(1)(a) prescribed consultees, section 42(1)(b) local authorities, the GLA and section 42(1)(d) Land Interests. The letters were accompanied by a memory stick with all of the documents listed at paragraph 3.3.4.

3.4.3 The section 42 letters informed the section 42 consultees of:

- a. who the Applicant was;
- b. what the proposals at that time were;
- c. the start of Phase One Consultation;
- d. a list of all the consultation materials. All Phase One Consultation materials were provided on a Project memory stick, which was enclosed in all section 42 Letters;
- e. where they could find a copy of the SoCC;
- f. the process for providing feedback; and
- g. the date by which the feedback needed to be provided.

3.4.4 A selection of copies of section 42 letters sent is provided in Appendix C2.

3.4.5 Section 45 of the Planning Act 2008 (as amended) requires that all section 42 consultees are provided with at least 28 days to provide feedback (this 28-day period begins with the day after the day on which the consultee receives the consultation documents). The section 42 notice letters sent on 25 November 2014 requested comments to be given by 27 January 2015. Section 42 consultees were therefore given more than 28 days to provide feedback.

- 3.4.6 The letters to all section 42 consultees were sent in accordance with the service of notices provisions set out in sections 229 and 230 of the Planning Act 2008 (as amended). Section 229(1)(c) allows for service to be by post and section 230 allows for the service method in section 229(1)(c) to be followed. The Applicant sent all the letters (which enclosed the Project memory sticks) to section 42 consultees by first class post on 25 November 2014. The Applicant obtained a certificate of posting from Royal Mail as evidence of posting the letters.

Letters to persons listed on the Regulation 9 EIA Regulations List

- 3.4.7 The Applicant sent letters of notification of Phase One Consultation and the Phase One Consultation materials on 25 November 2014 to all the persons listed on the Regulation 9 List. A selection of the letters sent are contained within Appendix C2.
- 3.4.8 Those letters were sent in accordance with the service of notices provisions in sections 229 and 230 of the Planning Act 2008 (as amended), using the same approach as described above in relation to letters sent to Phase One section 42 consultees.
- 3.4.9 The letters sent to Regulation 9 List persons followed the identical format and content of the Phase One section 42 letters.
- 3.4.10 The same consultation materials were sent to Regulation 9 List persons that were sent to Phase One section 42 consultees and to the SoS pursuant to section 46 of the Planning Act 2008 (as amended).
- 3.4.11 The letters requested their comments to be given by 27 January 2015. Regulation 9 List persons were therefore given the same amount of time as all section 42 consultees to provide feedback in relation to Phase One Consultation.
- 3.4.12 Table 4.1 provides an overview of how many Regulation 9 List persons provided feedback. Tables setting out the feedback received and the Applicant's responses are also contained in Section 4 of this report.

Consultation adverts

- 3.4.13 A variety of media were used to publicise Phase One Consultation. Notice of the SoCC was published in the Enfield Independent on 26 November 2014 in accordance with section 47(6) of the Planning Act 2008 (as amended). Copies of the SoCC were also made available at exhibitions and on the Project website.
- 3.4.14 Advertisements of Phase One Consultation were placed in the local newspapers shown in Table 3.3.

Table 3.3: Phase One Consultation printed advertisements

Publicity	Dates of circulation
Barnet and Potters Bar Times	27 November 2014 and 8 January 2015
Barnet First (council paper)	1 December 2014 (text rather than advertisement)

Publicity	Dates of circulation
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 7 January 2015
Our Enfield (council paper)*	November 2014 edition
Hackney Today (council paper)	1 December 2014 and 12 January 2015
Hackney Gazette	27 November 2014 and 8 January 2015
Haringey People (council paper)*	December 2014 and January 2015 editions
Haringey Independent/Tottenham and Wood Green Independent ⁹ *	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*	21 November 2014, 28 November 2014 and 9 January 2015
Londra Gazete (in both English and Turkish)	27 November and 8 January
Parikiaki (in Greek)	27 November

*publications which are distributed within the section 47 consultation zone/newsletter zone.

- 3.4.15 All publicity included an overview of the Project and the closing date for responses to Phase One Consultation. Those publications distributed within the section 47 consultation zone/newsletter zone (as marked with an * in Table 3.3) included dates/times and locations of exhibitions. A copy of the advertisements can be found in Appendix D2 and D3.
- 3.4.16 The consultation was also advertised in all of NLWA's seven constituent Borough papers which are delivered to all properties in each borough, these publications are amongst those listed in Table 3.3.
- 3.4.17 Advertisements were also placed in the online versions of the newspapers listed in Table 3.4.

⁹ Tottenham and Wood Green Independent and Haringey Independent are the same paper, published as 'Tottenham and Wood Green Independent: Incorporating Haringey'. Their website is at www.haringeyindependent.co.uk.

Table 3.4: Phase One Consultation online advertisements

Publication	Date
Enfield Independent online - skins & billboards (these are 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 – Mid Page Units (MPUs) (these are 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

Articles and press releases

3.4.18 Articles on the Project were published in the following publications during Phase One Consultation:

- a. Materials Recycling World (website, 20 November 2014 and 5 December 2014);
- b. Enfield Independent (website, 23 November 2014);
- c. Lets Recycle (website, 20 and 27 November 2014 and 6 January 2015);
- d. Air Quality News (website, 20 November 2014);
- e. Waste Management World (website, 24 November 2014); and
- f. CIWM Journal Online (website, 28 November 2014).

3.4.19 Press releases were also sent to national, regional and local publications and radio stations on 20 and 27 November 2014. A copy of the press releases and a list of publications/radio stations which were sent press releases can be found in Appendix D1.

Social media

3.4.20 Social media activity was used to informally promote the Phase One Consultation. Social media activity comprised promotion on Facebook and Twitter.

3.4.21 Customised Facebook promoted posts advertising the Project were developed to target the local community. An additional set of Facebook adverts promoting the consultation exhibitions was also customised so they would be targeted at those in the local community. In total five paid for 'promoted' Facebook posts were issued between 28 November 2014 and 27 January 2015. In the same period 63 unpaid Facebook posts were

issued. A selection of screenshots from the Project's Facebook page are contained in Appendix D15.

- 3.4.22 A total of 48 tweets were also issued by the Applicant to followers during the Phase One Consultation.

Newsletters

- 3.4.23 Two newsletters were distributed during Phase One Consultation. Both newsletters were hand delivered.
- 3.4.24 Issue 1 of the newsletter was hand delivered by a delivery company to 28,779 properties located within the section 47 consultation zone/newsletter zone between 20 November 2014 and 27 November 2014. Following feedback from two individuals that the newsletter had not been received, an investigation was carried out by the Applicant. This revealed that the delivery company had omitted some properties within the newsletter zone. Issue 1 of the newsletter was therefore re-delivered by hand to all properties in the whole section 47 consultation zone/newsletter zone by a different distribution company on 15 and 16 December 2014. A GPS tracking interface was used for the second delivery, which 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 within the section 47 consultation zone/newsletter zone that could be accessed were covered during this additional delivery round.
- 3.4.25 All properties within the section 47 consultation zone/newsletter zone were also hand delivered a copy of Issue 2 of the newsletter between 6 and 7 January 2015.
- 3.4.26 Issue 1 and Issue 2 of the newsletter provided information on the Project, the consultation and the exhibitions. The newsletters encouraged people to find out more information from the Project website or by visiting an exhibition. The closing date for responses to Phase One Consultation was also set out. A copy of the newsletters can be found in Appendix D4.

Leaflets

- 3.4.27 A leaflet was also produced. Three versions of the leaflets were produced as follows:
- a. Version 1a - for distribution to locations outside of section 47 consultation zone/newsletter zone. This included full details of the consultation but excluded details of the consultation exhibitions and referred to the proposed ERF as "*a replacement waste facility for north London*";
 - b. Version 1b – for locations within the section 47 consultation zone/newsletter zone. This version included details of all the consultation exhibitions and referred to the proposed ERF as a "*replacement facility at Edmonton*"; and
 - c. Version 1c – produced in January 2015 for distribution in the section 47 consultation zone/newsletter zone. The same as version 1b but with the

details of an additional exhibition venue at Boundary Hall in Angel Edmonton.

- 3.4.28 A copy of each version of these leaflets is provided in Appendix D5.
- 3.4.29 Leaflets were delivered to community drop off points located across the NLWA Constituent Boroughs on 20 November 2014. Community drop-off points were provided version 1a or 1b of the leaflet depending on their location, a list of which version each community drop-off point received can be found in Appendix F1.
- 3.4.30 Community drop-off points are locations where leaflets about the Project were accessible to the community. Community drop off points included approximately 80 libraries, 30 Council offices and 100 other locations such as schools, community centres, leisure and sports clubs, arts centres, and medical centres. A list of all community drop off points can be found in Appendix F1. Figure 3.3 illustrates the locations of the community drop-off points.
- 3.4.31 The community drop off point locations were chosen to ensure a spread of points across the section 47 consultation zone/newsletter zone and wider north London.
- 3.4.32 100 copies of the leaflet were sent to each community drop-off point. Many of the community drop-off points are libraries so leaflets were distributed using the central distribution service for sending information to libraries where this existed. For those that did have a central distribution service, the leaflets were provided to them in packs, one pack per envelope addressed to each library, and delivered through the central distribution point. Where no central distribution point existed, information was sent by post directly to each community drop-off point. A letter was included with each pack of leaflets explaining the information to the recipient and asking them to make it available to visitors.
- 3.4.33 Additional locations were hand delivered Version 1b of the leaflet during Phase One Consultation to encourage attendance at exhibitions. The following locations were hand delivered leaflets the date on which they were distributed is in brackets:
- Edmonton Green Shopping Centre (3 December 2014);
 - Green Towers Community Centre(3 December 2014);
 - ASDA Edmonton Green (3 December 2014);
 - Odeon Cinema, Lee Valley Leisure Complex (6 December 2014);
 - Lee Valley Athletics Centre (6 December 2014);
 - Edmonton Green Baptist church (8 December 2014);
 - Enfield Homes reception area and consultation booths, Edmonton Green Shopping Centre (8 December 2014);
 - Enfield library IT centre/internet cafe, Edmonton Green Shopping Centre (8 December 2014);
 - Enfield contact centre reception, Edmonton Green Shopping Centre (8 December 2014);

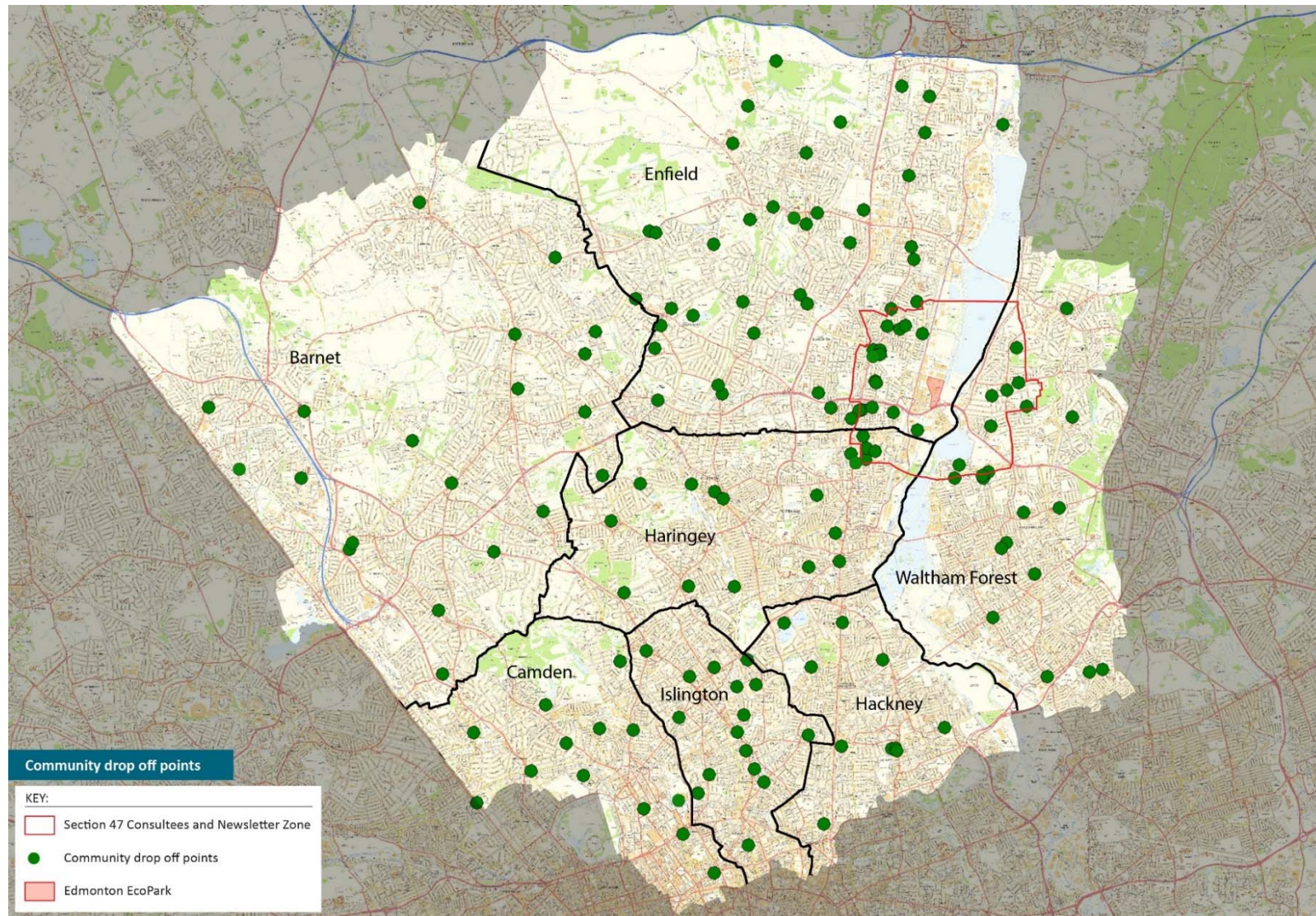


Figure 3.3: Community drop-off points (all within the Constituent Boroughs)

- j. Community House Community Centre, Fore St (8 December 2014);
- k. Wilko, Edmonton Green Shopping Centre (8 December 2014);
- l. Tesco Lee Valley (8 December 2014); and
- m. IKEA, Lee Valley staff canteen (8 December 2014).

3.4.34 Head teachers of all of the 20 schools within the section 47 consultation zone/newsletter zone were sent a pack of 100 leaflets (Version 1b). The schools were also sent a copy of the newspaper advert which included dates/times of exhibitions 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. Additionally, head teachers 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 section 47 consultation zone/newsletter zone were also sent a copy of the same newspaper advert and 100 leaflets (Version 1b).

Feedback form and consultation booklet

- 3.4.35 A feedback form containing 11 questions was made available in hard copy at the exhibitions and in an electronic version on the Project website. The hard and electronic versions of the feedback form asked exactly the same questions, which were the same as those set out in the Consultation Booklet. A PDF version of the feedback form was also available online to be downloaded and posted to the Project's FREEPOST address.
- 3.4.36 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. Consultation booklets were available at all the public exhibitions and an electronic version was available on the Project website.
- 3.4.37 A copy of the consultation booklet and feedback form (in hard copy and as it appeared on the website) are included in Appendix D8 and D9 respectively.

Project website

- 3.4.38 A dedicated website for the Project was launched on 20 November 2014, a week in advance of the start of Phase One Consultation on 28 November 2014 (www.northlondonheatandpower.london). This website remained live throughout the duration of the pre-application process.
- 3.4.39 The website is compliant with Royal National Institute of Blind People (RNIB) guidelines and utilises audio and visual communication. 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. During Phase One Consultation the website provided electronic versions of all the consultation information, as well as a short video providing a brief introduction to the Project and a link to the online version of the feedback form and consultation booklet. Two of the three videos on

the Project website also had subtitles, the third did not but because it principally focussed on the architect's visualisation.

- 3.4.40 A frequently asked questions section was included on the website. This was updated during Phase One Consultation to provide additional information to consultees on common issues and questions. A selection of screenshots of the website as it appeared during Phase One is contained in Appendix D14.

Telephone line

- 3.4.41 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. Callers were directed to the website to submit a response, or where requested sent a hard copy of the feedback form for postal comments.

E-mail

- 3.4.42 A dedicated e-mail address (info@northlondonheatandpower.london) was made available for queries throughout the duration of Phase One Consultation. Responses to consultation could also be submitted via this e-mail address.

Community briefings

- 3.4.43 To promote the exhibitions and the consultation, local community briefings were offered to local community representatives alongside the public exhibitions.
- 3.4.44 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.
- 3.4.45 Community groups were made aware of the opportunity to have a briefing through the following methods:
- a. details about the consultation were included in Enfield Voluntary Action's newsletter which was e-mailed to approximately 750 local groups on 15 January 2015. A copy of the e-mail is included in Appendix D12;
 - b. the Applicant attends South East Partnership Board and West Enfield Partnership Board which have resident, voluntary and community sector representation. As part of the Applicant's existing engagement with these groups, updates on the Project were provided and a presentation was offered to groups who might be interested;

- c. NLWA and local ward Members were encouraged to provide details of any community groups that they knew about. None were put forward during Phase One Consultation.
- d. some of the community drop-off points, which were provided copies of leaflets, were locations which community groups use to meet. For example Community House Community Centre at 311 Fore Street, is the base for Enfield Voluntary Action; Crossroads Care, Enfield; Enfield Caribbean Association; Enfield Disability Action; Enfield Racial Equality Council; Enfield Saheli; Enfield Somali Community Association; Enfield Turkish Cypriot Association; Greek and Greek Cypriot Community of Enfield; One-to-One (Enfield) and the Tamil Relief Centre.

3.4.46 Briefings were given to all groups who requested one. Table 3.5 summarises the briefings with local councillors and local community groups.

Table 3.5: Phase One Community Briefings

Briefing to	Date	Notes
Local Waltham Forest Members (with wards in the vicinity)	8 December 2014	Resulted in a request for consultation booklets to be sent to Endlebury Area Forum meeting on 19 January 2015. These were sent on 19 January 2015.
South East Enfield Partnership meeting	15 January 2015	No further action required.
West Enfield Partnership meeting	19 January 2015	No further action required.
Jubilee Ward Area Forum, Enfield	20 January 2015	No further action required.

3.4.47 Additionally, an email was sent from LondonWaste on 1 December 2014 to 230 previous visitors to the Edmonton EcoPark between 2011 and 2014, containing information on the Project and how to get involved/provide feedback. A copy of this e-mail is included in Appendix D13. In addition, copies of leaflets and consultation booklets (see Appendix D5 and D8) were displayed at Edmonton EcoPark throughout the Phase One Consultation period.

Public Exhibitions

3.4.48 During Phase One Consultation a programme of public exhibitions was held in the vicinity of the Edmonton EcoPark to give consultees, the opportunity to find out more about the Project and the chance to give their responses to feedback.

3.4.49 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. In accordance with the SoCC, attendees were encouraged to ask questions of the Project team who were at all of the exhibitions and to submit written feedback by way of completing the

feedback form either at the exhibitions or taking a printed copy away for later completion, or going online.

- 3.4.50 Details of the exhibition locations and opening hours are set out in Table 3.6.

Table 3.6: Exhibition locations

Location	Date
Lee Valley Athletics Centre, 61 Meridian Way, London, N9 0AR	Friday, 5 December 2014, 3pm – 8pm Saturday, 6 December 2014, 11am – 5pm Wednesday, 14 January 2015, 3pm – 8pm
Green Towers Community Centre, Edmonton Green Shopping Centre, London, N9 0BU	Monday, 8 December 2014, 10am – 8pm Thursday, 15 January 2015, 10am – 8pm Saturday, 17 January 2015, 11am – 5pm
Boundary Community Hall, Snells Park Estate, Edmonton, N18 2SY	Thursday 22 January 2015, 4.30 pm – 8.30pm ¹⁰

- 3.4.51 The exhibitions displayed information to inform visitors about the Project. The same information was displayed as that made available on the Project website.
- 3.4.52 The following information was available at the Phase One exhibitions copies of which (excluding ‘all supporting information’) can be found in Appendix D:
- 13 information boards;
 - foamex boards showing example materials;
 - an information board playing a short introductory video (with sub-titles);
 - consultation booklet;
 - leaflets advertising the consultation;
 - feedback form;
 - a ‘business card’ with key Project contact details;
 - Issue 1 of the NLHPP newsletter (only available at the exhibitions held in December 2014);
 - Issue 2 of the NLHPP newsletter (only available at exhibitions held in January 2015);
 - copies of the SoCC; and
 - all supporting information i.e. technical documents available on the Project website.
- 3.4.53 A copy of the information boards is contained in Appendix D10 and a copy of the foamex boards is contained in Appendix D11.
- 3.4.54 Tours of the Edmonton EcoPark including the existing EfW facility were offered to people attending exhibitions. Public tours of the Edmonton

¹⁰ Because the venue had been double booked this exhibition closed at approximately 6.30pm.

EcoPark usually take place on Wednesdays, and additional tours were offered on Saturdays throughout the Phase One Consultation period.

3.5 Responding to further information requests

- 3.5.1 During Phase One Consultation five requests for further information were received via the dedicated Project telephone line. No written requests for further information were received. Callers requesting further information were directed to the Project website, or where requested, sent a hard copy of the feedback form for postal comments.



Figure 3.4: Phase One Consultation exhibition at Lee Valley Athletics Centre

3.6 Approach to analysis

Recording feedback

- 3.6.1 Responses were received either as online response forms (via the website) or as offline responses (paper response forms, letters and emails).
- 3.6.2 Table 3.7 provides an overview of the number of responses received by response type during Phase One Consultation.

Table 3.7: Number of responses received by response type

Response Type	Phase One
Email	20
Letter	5
Online feedback form	41
Hard copy of feedback form	6
Null response	9
Total	72 (plus 9 null responses)

3.6.3 A null response is a response form with no comment, a duplicate response or an item received that is not a response to the consultation. A total of nine null responses were received during Phase One Consultation. These were not included in the reporting process.

3.6.4 All responses were assigned a unique reference number and categorised with its response type on receipt.

Responses via the website

3.6.5 Online feedback was securely downloaded from the Project website on a regular basis throughout Phase One Consultation.

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

Paper feedback forms via public exhibitions

3.6.7 At each exhibition it was possible to submit a completed hard copy feedback form. All feedback forms received at exhibitions were logged and given a unique reference number. These were then scanned in order to be imported into the data analysis system.

Paper feedback forms and letters received via the freepost address

3.6.8 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 comments

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

Analysing feedback

3.6.10 In order to analyse the responses, and the variety of views expressed, a coding framework was created. The purpose of the framework was to organise responses by key themes and issues so that key messages as well as specific points of detail could be captured and reported.

3.6.11 An initial coding framework was developed based loosely on the consultation response form structure and a review of an early set of responses. Each code is intended to represent a specific issue or argument raised in responses. Codes were either two-tier or three-tier depending on the depth of comments on that particular theme.

3.6.12 As analysis continued, the coding framework was refined and additional codes were added as appropriate. The coding process enabled all responses to be indexed according to the issues raised.

3.6.13 Table 3.8 details the eight overarching themes used to analyse the consultation responses received in Phase One.

Table 3.8: List of themes used in the analysis of the Phase One Consultation responses

Theme	Description
Need	Comments relating to the need case for the Project
Landscape, design and appearance	Comments relating to the landscape, design and appearance of the Project
Environment	Comments relating to the environmental impact of the Project
Cooling system	Comments relating to the cooling system options for the Project
Traffic and transport	Comments relating to the traffic and transport impact of the Project
Community benefits	Comments relating to community impact and benefits associated with the Project
Consultation	Comments relating to the consultation process and requests for information
Other	Codes mainly used for processing purposes.

Responding to feedback

- 3.6.14 Section 46(2) of the Planning Act 2008 (as amended) imposes a duty on applicants to “*have regard to any relevant responses*” received to consultation under sections 42 and 47. A response to consultation is defined as a relevant response if it is received within the specified consultation deadline.
- 3.6.15 Responses received from Phase One Consultation have been carefully considered and taken into account in developing the Project. Following identification and coding of the comments, the Applicant 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.
- 3.6.16 Section 4 sets out how feedback from Phase One Consultation has been addressed. Where the proposals remain the same as presented prior to Phase One Consultation justification for this outcome has been provided.
- 3.6.17 In order to provide feedback to consultees, and in line with the Applicant’s commitment in the SoCC, a Phase One Consultation Feedback Report was released publicly as part of Phase Two Consultation. It was made available on the Project website at the start of Phase Two Consultation on 18 May 2015. It was also available on NLWA’s corporate website. This report summarised the Applicant’s response to Phase One Consultation and the subsequent changes made to the Project as a result.

Late feedback

- 3.6.18 Late responses were defined as any feedback received after the publicised close of the Phase One Consultation. For Phase One Consultation this was any feedback received after 5pm on 27 January 2015.

- 3.6.19 All late feedback was taken into consideration in the response analysis and is reported as part of the wider findings of this Report.
- 3.6.20 Nevertheless, any late feedback was classified as such when the responses were logged. Late responses are marked with an asterisk (*) in the tables in Section 4 to enable the clear identification of the number of late respondents at this phase of consultation.

4 Feedback from Phase One Consultation

4.1 Introduction

- 4.1.1 This Section sets out the feedback received at Phase One Consultation and how this has been taken into account in the development of the Application in accordance with the requirements of section 49 of the Planning Act 2008 (as amended).

4.2 Overview of feedback received

- 4.2.1 A total of 72 responses were provided at Phase One. The Project website attracted more than 3,000 visitors during the Phase One Consultation period. Table 4.1 sets out the number of respondents by respondent type.

Table 4.1: Number of respondents

Section of Planning Act 2008 (as amended)	Consultee type	Number of respondents	Name of respondents
42(1)(a) 42(1)(c)	Prescribed 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; Trinity House.
42(1)(b)	Local authorities	3	Hertsmere Borough Council; London Borough of Enfield; Westminster City Council. ¹¹
42(1)(d)	Land Interests	2	Lee Valley Regional Park Authority; LondonWaste Limited.
47	Community consultees	57	Subject to Data Protection Act.

¹¹ Westminster City Council are reported as a Local Authority that provided feedback, however they are not a consultee under Section 42 (1)(b) of the Planning Act 2008 (as amended).

4.2.2 Table 4.2 identifies the number of late respondents at Phase One Consultation:

Table 4.2: Late feedback

Number of late respondents
1 Landowner
1 Prescribed Consultee
1 Community Consultee

4.2.3 Table 4.3 shows the number of responses to each of the Phase One Consultation questions, and the number of general responses.

Table 4.3: Number of responses by question

Question	Number of comments
1. What are your views on our proposal for a new facility to replace the existing plant at Edmonton EcoPark?	44
2. What are your views on landscaping, design and appearance of our proposal for the EcoPark?	34
3. Do you have any particular concerns and/or interests in relation to potential environmental effects? If so, what are they?	36
4. Do you have any comments relating to air quality?	36
5a. To what extent do you agree with our assessment of the cooling system for the proposed development?	32
5b. Which considerations are particularly important to you?	25
6. What do you think is important for us to consider with regard to traffic associated with our proposed facility?	33
7. What would you like us to take into consideration when we plan for the construction of the proposed facility and demolition of the existing plant?	32
8. What are your views on us providing a visitor centre as part of our proposal and what facilities do you think should be included?	34
9. Do you have any suggestions for what would help in the local area with regard to our proposal and the construction period? If so, please describe them.	30
10a. What do you think about the information we have provided during this phase of consultation?	33
10b. What more information do you think we could provide?	27
10c. Do you have any comments on how we could improve your experience for our next phase of consultation?	24
11. Do you have any other comments in relation to our proposals for a new facility?	25
Responses that did not fit into any of the above questions	25
Total	470

4.3 Feedback and response

- 4.3.1 The following tables set out consultee comments received in response to Phase One Consultation, by topic, and the Applicant's response to those comments.
- 4.3.2 The tables match the tables set out in the Phase One Consultation Feedback Report published by the Applicant in May 2015, with one exception. The exception relates to the Applicant's response 4.5.31 in the Need Table which has been expanded to provide further information on the 'Norfolk Solution'. Additionally the final column 'Change' has been added to the tables set out below to indicate whether the feedback resulted in a change to the Project. In the final column a 'C' is used to record that a change has been made to the Project in light of the consultation feedback. Where no change has been made this is recorded as 'N'.
- 4.3.3 The tables are categorised into the following topics:
- a. Environment;
 - b. Need;
 - c. Landscape, Design and Appearance;
 - d. Cooling System;
 - e. Traffic and Transport;
 - f. Community Benefits; and
 - g. Views on the Consultation Process.
- 4.3.4 The following abbreviations are used in the following tables:
- a. PC: Prescribed Consultee;
 - b. LA: Local Authority;
 - c. LI: Land Interest;
 - d. CC: Community Consultee;
 - e. GLA: Greater London Authority;
 - f. HBC: Hertsmere Borough Council;
 - g. HSE: Health and Safety Executive;
 - h. LBE: London Borough of Enfield;
 - i. LVRPA: Lee Valley Regional Park Authority;
 - j. LWL: LondonWaste Limited;
 - k. NG: National Grid;
 - l. TWUL: Thames Water Utilities Ltd; and
 - m. WCC: Westminster City Council.
- 4.3.5 Late responses are marked with an asterisk.

4.4 Environment

4.4.1 The comments raised in respect of environment issues during Phase One Consultation are summarised in Table 4.4 below together with the Applicant's response.

Table 4.4: Comments on the environment received at Phase One Consultation

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
Impact on air quality								
4.4.2	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_x to be predicted over a wider area than monitoring. This ensures any high concentrations of pollutants are included in ambient monitoring. Air quality modelling</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
							measures will be set out in the environmental impact assessment.	
4.4.3	Concern regarding CO ₂ and NO including the following comments; a) will be high; b) should be minimised; c) comply with London Plan carbon targets; d) the NO _x scrubber would not be efficient in removing the NO _x gas.	GLA	LBE	-	3	38, 42, 10028	The ERF must comply with stringent emission standards set by the Environment Agency. The replacement facility 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 _x emissions. The scheme would include Selective Catalytic Reduction which is the most effective available treatment available for NO _x .	N
4.4.4	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. A <i>Health Impact Assessment</i> is also being undertaken for the scheme and will form part of the DCO application.	N
4.4.5	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.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
4.4.6	Concern regarding cumulative impact when combined with North Circular Road pollution.	-	-	-	1	24	<p>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).</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 DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i>.</p>	N
4.4.7	Concern regarding emissions during demolition including release of contaminants and release of dust containing asbestos/heavy metals during demolition.	-	LBE	-	1	25	<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 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.</p>	N
4.4.8	Concern regarding emissions during start-up and shut-down period.	-	-	-	1	6	<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 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.</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
4.4.9	Concern regarding emissions/dust from transport vehicles including the cumulative with existing pollution.	-	-	-	5	17, 24, 45, 46, 10006	<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 DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i>.</p> <p>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 Practice</i> which will be available during Phase Two Consultation.</p>	N
4.4.10	Request to prioritise low emissions and aim for zero pollution.	-	-	-	7	21, 25, 36, 37, 41, 44, 10018	<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 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.</p>	N
4.4.11	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	-
4.4.12	Suggest mitigation measures including low-emission	-	-	-	3	21, 24, 38	The majority of vehicles visiting the Edmonton EcoPark are those owned and operated by the north London boroughs and as such it are outside the	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	vehicles and carbon capture technology.						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.	
Visual impact								
4.4.13	Concerns about the visual impact of the scheme including: facility will have high visibility; impact on Green Belt; impact on LVRP and Navigation Corridor; landscaping proposals not sufficient.	-	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 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.	N
4.4.14	Removal of the Camden Aggregates site will increase visual impact of proposed ERF.	-	LBE	-	1	26	The Camden Aggregates ¹² 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.	N

¹² Camden Aggregates is referred to as Camden Plant Ltd elsewhere in the Application.

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
Impact on ecology/wildlife								
4.4.15	<p>Concern about impact on ecology/wildlife including:</p> <ul style="list-style-type: none"> a) loss of vegetation and habitat in north/east of site; b) impact on Salmons Brook, Lee Navigation Corridor, SSSI, Tottenham Marshes, Lee Park Way; c) impact on habitat connectivity; d) impact of construction on natural habitats; e) not covered sufficiently in EIA. 	-	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 Code of Construction Practice.</p>	N
4.4.16	Concern regarding impact of light pollution on ecology/wildlife.	-	LBE	LVRPA*	0	-	<p>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 PEIR.</p> <p>The Code of Construction Practice for the scheme will include measures regarding lighting during construction.</p>	N
4.4.17	<p>Suggested mitigation measures including:</p> <ul style="list-style-type: none"> a) increase viable habitat on/around the site and 	-	LBE	LVRPA*	1	10010	<p>Appropriate ecological measures will be included in the scheme design, including the Code of Construction Practice. These measures will be summarised in the ecology Section of the Environmental Statement.</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	include in landscaping strategy; b) set back main massing from eastern edge; c) dark corridor along Lee Park Way/Navigation; d) provision of Living Walls.							
Noise pollution								
4.4.18	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 Environmental Statement. The Code of Construction Practice for the scheme will include measures regarding the management of noise during construction.	N
4.4.19	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 Code of Construction Practice for the scheme will include measures regarding the management of noise during construction.	N
Water pollution/flood risk								
4.4.20	Concerns regarding water pollution and flood risk including: a) potential contamination of water courses/reservoir/ ecosystem; b) pollution from water-borne freight;	GLA TWU L*	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 Environmental Statement.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	c) surface water drainage issues; d) flood risk.						The Code of Construction Practice for the scheme will include measures to protect surface and ground water during construction.	
4.4.21	Suggested mitigation measures including: a) comply with London Plan surface water drainage hierarchy; b) rainwater harvesting system; c) liaise with EA; d) apply for Trade Effluent Consent; e) seek groundwater discharge permit; f) take account of required pipe pressure; g) fit petrol/oil interceptors on facilities; h) fat trap in catering areas; i) waste oil collection and recycling into biodiesel.	GLA TWU L*	LBE	-	0	-	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 Code of Construction Practice for the scheme will include measures to protect surface and ground water during construction. 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. 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.	N
Impact on health/safety								
4.4.22	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.	N
4.4.23	Check whether Hazardous Substances Consent is	HSE	-	-	0	-	The operations would be required to comply with all relevant consents and regulations including those	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	required and comply with regulations.						relating to the use, storage, and treatment/disposal of hazardous substance.	
4.4.24	Comments regarding the health impact of emissions including concern regarding cancer generally, respiratory cancer and asthma, impact on individual with COPD, request for evidence and stricter emission controls may be required.	-	-	-	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 Health Impact Assessment is also being undertaken for the scheme and a draft will be available during Phase Two Consultation.	N
4.4.25	Comply with all regulations and refer to HSE website.	HSE	-	-	0		The Project would comply with all applicable regulations.	N
Odour								
4.4.26	Concern regarding odour including: a) odour comes from current site; b) unsure where odour originates from; c) odour will increase in new location for Russell Road resident; d) conduct odour assessment.	-	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.	N
4.4.27	Odour will be minimised due to removal of composting facility.	-	-	-	1	10006	Noted.	-
4.4.28	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.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
Impact on climate change								
4.4.29	Concern regarding impact on climate change and request that this is assessed. Comments include: a) minimise carbon emissions conform with Enfield's Spatial Vision and Strategic Objective 2; b) not covered in documents so far; c) conduct full analysis of implications of proposal and alternatives;	-	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 Sustainability Statement to be submitted as part of the DCO application will set out more details on this.	N
	minimise embodied carbon during construction.						The embodied carbon is assessed as part of the BREEAM assessment which will form part of the DCO application.	N
4.4.30	Query if the scheme will reduce climate change impact and meet Carbon Intensity Floor target	GLA	-	-	-	-	The Sustainability Statement 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.	N
General/other environmental impact								
4.4.31	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 Code of Construction Practice for the scheme.	N
4.4.32	Positive impact/ will minimise/reduce environmental impact. Comments include:	-	WCC	-	7	8, 28, 37, 39, 43, 10002, 10006		-

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	a) less fossil fuel reliance; b) provision of power to homes; c) modern technologies.							
4.4.33	Other concerns including: effluent from wet treatment of flue gases; leaks; litter from waste vehicles; fly tipping.	-	-	-	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.	N
4.4.34	Suggested mitigation measures including: a) align with London Plan; b) robust CoCP; c) support green charities; d) recycle/re-use materials from old plant.	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 be contained within the <i>Code of Construction Practice</i> for the scheme. 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.	N
Further assessments required								
4.4.35	Requests for further assessments including: a) carbon assessments; b) climate change analysis for proposal and alternatives;	NE GLA TWU L*	LBE	LVRPA*	5	6, 29, 38, 10016, 10028	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-	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	c) noise studies including impact on sensitive receptors; d) local health impact of emissions; e) protected species survey; f) air pollution assessments using WHO levels; g) visual impact study; h) flood risk assessment; i) cumulative impact assessment; j) assessment of effects of increased water demand, waste treatment and surface water.						<p>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>	
No concerns/mitigation measures are sufficient								
4.4.36	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, 10008, 10009, 10019, 10020	Noted.	-

Account taken of Phase One environment comments

- 4.4.37 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 was provided in the Preliminary Environmental Information Report (PEIR) which was published during Phase Two Consultation. The Code of Construction Practice (CoCP), also published during 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.
- 4.4.38 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.
- 4.4.39 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.
- 4.4.40 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.

4.5 Need

4.5.1 The comments raised in respect of the need for the scheme during Phase One Consultation are summarised in Table 4.5, together with the Applicant's response.

Table 4.5: Comments on the need for the scheme received at Phase One Consultation

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
Reasons for support								
4.5.2	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.	-
4.5.3	Support because the current facility is reaching the end of its life.	-	-	LWL	3	5, 6, 16		-
4.5.4	Support because less waste will be sent to landfill.	GLA	-	LWL	0	-		-
4.5.5	Support because the new technology would allow waste to be treated more efficiently.	GLA	WCC LBE	LWL LVRP A*	6	19, 25, 33, 37, 10006, 10008		-
4.5.6	Support because the new technology is more environmentally-friendly.	-	WCC	-	8	8, 16, 18, 28, 37, 43, 54, 10006		-
4.5.7	Support because the new technology is future-proof and will not become outdated soon.	-	-	-	1	16		-

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
4.5.8	Support because it encourages recycling by increasing the recycling capacity.	GLA	HBC	-	3	35, 39, 10019		-
4.5.9	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		-
4.5.10	Support because it meets future demand. Population and waste volumes are growing.	GLA	WCC	LVRP A*	0	-		-
4.5.11	Support because it makes use of existing site and workforce.	GLA	-	LWL	4	5, 9, 52, 10005		-
4.5.12	Support promotes waste and net self-sufficiency.	GLA	-	-	0	-		-
4.5.13	Support because more waste will be managed closer to source. This in turn would minimise travel.	GLA	WCC	-	2	47, 52		-
4.5.14	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		-
4.5.15	Support with the following caveats: a) should not disturb the local community and environment, b) should not discourage recycling,	-	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	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
	c) should be cost and energy efficient d) should use future-proof technology e) should demonstrate it provides sustainable and efficient solution that meets all policy requirements.						More detailed information on the design of the ERF will be available during Phase Two Consultation.	
Reasons for challenging the proposed facility								
4.5.16	Oppose because residents will not benefit.	-	-	-	3	24, 48, 53	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. 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.	N
4.5.17	Negative impact on recycling/re-use/prevention. Incineration should be a last resort.	-	-	-	9	9, 36, 38, 47, 5310016, 10021, 10025, 10031*	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	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							has more details of this activity (See: http://www.wiseuptowaste.org.uk/). 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).	
4.5.18	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.	N
4.5.19	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	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 Assessment</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.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							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).	
4.5.20	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 area in contravention of the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.</p>	N
4.5.21	<p>Flaws in waste forecasting approach including:</p> <p>a) does not look into other forecasting scenarios</p> <p>b) uses wrong/unreliable data.</p>	-	-	-	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 Assessment 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</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							forecasts various scenarios were considered. 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.	
4.5.22	Waste arisings forecast inconsistent with the North London Waste Plan (NLWP).	-	LBE	-	3	38, 10016, 10025	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 carried out for this Project. The NLWP is due for consultation in the summer of 2015, and the Edmonton	N
4.5.23	Lack of integration with other strategies and the partner authorities are inconsistent in their waste and recycling targets. The proposed approach could result in some waste processes being outsourced.	-	-	-	2	10016, 10021		N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							<p>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>	
4.5.24	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 and will be available at Phase Two Consultation.</p> <p>Further cost information will be available at Phase Two Consultation but will remain subject to detailed design after the Development Consent Order (DCO) application has been determined.</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							Decisions are made by NLWA which is made up of 14 councillors, two from each of the seven constituent boroughs. In developing this scheme, NLWA has been working with the seven boroughs as its partners.	
4.5.25	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 Edmonton EcoPark on a part of the site currently used for other waste treatment facilities. The whole Edmonton 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.	N
4.5.26	The ERF is too close to residents.	-	LBE	-	4	22, 24, 25, 10003	The ERF would be located at the Edmonton 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 properties are 600m to the east and west of the site. 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 Environmental	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							Statement which forms part of the DCO application.	
4.5.27	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.	N
4.5.28	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 Environmental Statement which forms part of the DCO application.</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
4.5.29	Concerns about cost including: a) financial implication of overcapacity	-	LBE	-	3	38, 10016, 10021	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.	N
	b) need for carbon capture facilities.						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.	N
Alternatives								
4.5.30	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 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.	N
4.5.31	Suggest the following as alternatives: anaerobic digestion, pyrolysis and the 'Norfolk solution' i.e. making bricks and road surfacings.	-	-	-	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 Alternatives Assessment Report which will be available during Phase Two Consultation.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							<p>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 Alternatives Assessment Report.</p> <p>The Applicant, through a contractor in site, already produces building material and aggregates from bottom ash produced by the existing EfW facility. However, the Applicant is unaware of any technology capable of creating bricks and road surfacing directly from 'residual arisings' due to its chemical and physical properties. In order to create building materials, residual waste must first be treated to produce an inert material with little or no organic and combustible content. This is achieved through thermal processing, either through gasification or incineration, to leave only ash and inerts. After this, building products may be produced through either refinement (as is standard practice for bottom ash), binding with a cement type material to create blocks, or vitrification (melting at a high temperature) to produce a glass like aggregate.</p>	
4.5.32	Dual capability to be considered if there is less waste fuel in the future.	-	-	-	1	10019	<p>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.</p> <p>Based on our assessment, we considered, that an ERF is the most</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							suitable technology to manage North London's residual waste. Details of our assessment process will be set out in the Alternatives Assessment Report which will be available during Phase Two Consultation.	
Lee Valley Heat network								
4.5.33	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 heat would be supplied to the Lee Valley Heat Network.	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 heat from the ERF to be used as part of the heat network.	N
Timeline								
4.5.34	Timeline is reasonable.	-	-	-	1	43	Support for the timeline is noted and welcomed.	-
4.5.35	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.	-
Criteria								
4.5.36	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.	N
4.5.37	Should be modern/efficient	-	LBE	-	2	16, 45		N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
4.5.38	Should be future proof/upgradable	-	-	-	3	9, 28, 42	<p>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.</p> <p>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.</p>	N
Further studies are required								
4.5.39	Request studies that ensure that no National Grid's apparatus would be affected.	NG	-	-	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.	N
4.5.40	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 Alternatives Assessment Report which will be available during Phase Two Consultation. Further financial and risk assessment will take place before any procurement is carried out.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
Other								
4.5.41	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.	N

Account taken of Phase One need comments

- 4.5.42 A number of comments requested further information on and assessment of the alternatives considered. In response the Alternatives Assessment Report was published during Phase Two Consultation. This report details the decisions leading to the selection of the proposed technology.
- 4.5.43 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, was published in the Need Assessment which was available during Phase Two Consultation.

4.6 Landscape, design and appearance

4.6.1 The comments raised in respect of landscape, design and appearance during Phase One Consultation are summarised in Table 4.6, together with the Applicant's response.

Table 4.6: Comments on landscape, design and appearance received at Phase One Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
No concerns/proposals are acceptable								
4.6.2	Satisfied with the proposed approach.	-	-	-	7	18, 26, 40, 42, 48, 50, 10020	Noted	-
4.6.3	Supports the proposed positioning of the chimney stack.	-	-	LVRPA*	0	-	Noted	-
Appearance								
4.6.4	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.	N
4.6.5	Should blend in with the surrounding environment.	-	-	-	6	9, 22, 24, 36, 44, 54	The proposed development is being 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.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
4.6.6	Should be impressive and become a tourist attraction like similar facilities abroad.		WCC		2	5, 6	<p>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.</p> <p>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.</p>	N
4.6.7	Should be modern and pleasant to look at.	-	-	LVRPA*	5	41, 45, 5410006, 10010	<p>The ERF would be a new flagship facility of a high quality of design.</p> <p>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.</p>	N
4.6.8	Should be simple and in keep with its industrial use.	-	-	-	2	21, 25	<p>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.</p>	N
4.6.9	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.	N
4.6.10	Appearance specific suggestions including: use architectural detailing, height variation, fenestration, use of high quality finishing materials;	-	LBE	LVRPA*	0	-	Specific suggestions regarding the detailed design of EcoPark House will be taken into consideration in developing our proposals.	N
	comply with CLAAP, Core Strategy and DMD;						LB Enfield's policy including the Central Leaside Area Action Plan, Core Strategy and DMD have informed the design.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
	two-storey reception building.						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.	N
Chimney stack								
4.6.11	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. 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.	N
4.6.12	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.	C
4.6.13	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	N
4.6.14	Prefer a chimney stack with a single flue because it is less obtrusive.	-	-	-	8	19, 21, 39, 40, 41, 45, 10010, 10019		C

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
							<p>preferring the flues to be combined into one chimney.</p> <p>On balance it is considered that a single chimney stack which incorporates both flues is a less visually intrusive option.</p>	
4.6.15	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.	N
4.6.16	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.	N
4.6.17	Suggest that the design is innovative, with a narrower diameter, and that it is low and unobtrusive.	-	LBE	-	1	24	<p>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 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</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
							comments raised during Phase One Consultation. The stack has been designed as a component part of the overall design of the ERF.	
Landscaping								
4.6.18	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 Edmonton 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 a green edge along the eastern boundary and create high quality</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
							waterside areas, both of which have been incorporated in to the landscape strategy. Further details on landscaping will be available during Phase Two Consultation.	
4.6.19	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>	N
4.6.20	Support for green walls / roofs to mitigate visual impact, increase	-	LBE	LVRPA*	9	16, 19, 27, 39, 43, 47,	A green roof is proposed above the ERF tipping hall and a brown roof is proposed	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
	biodiversity and harvest water harvesting. Brown roof also noted as acceptable.					48, 10006, 10019	<p>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 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.</p> <p>Further details on landscaping will be available during Phase Two Consultation.</p>	
4.6.21	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.	N
4.6.22	Oppose green walls/roofs because they are not cost-effective and not important. Suggestion to keep greenery and buildings separate.	-	-	-	3	18, 10010, 10018	<p>On balance, given the significant maintenance required for green walls, along with the other mitigation measures already incorporated into the design, it is not proposed to also have green walls.</p> <p>Green roofs are proposed as these would provide visual mitigation and ecological enhancement.</p>	N
Other specific suggestions and comments								
4.6.23	Other suggestions/ queries including: a) swift nests in the walls;	-	LBE	LVRPA*	6	12, 25, 47, 10008, 10009, 10019	The proposals takes significant account of ecology in the local area however swift bricks are not proposed.	N
	b) nature trail;						It is assumed that the suggestion to create a nature trail means within the Lee Valley Regional Park which is located outside the	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
							boundary of this Project and as such it is outside the scope of this Project to deliver a nature trail in this location.	
	c) reduce bulk and massing on east side;						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.	N
	d) buffer zone to Lee Navigation;						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.	N
	e) public access to western bank of canal;						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.	C
	f) restore ditch along Lee Park Way and install coir rolls;						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.	N
	g) use a natural barrier like Camden Aggregates;						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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape, design and appearance								
							measures would screen the ERF and enhance the overall environment.	
	h) liaise with local food growing projects re edible landscaping;						The Edmonton 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.	N
	i) consult Capel Manor;						Capel Manor will be consulted during Phase Two Consultation.	N
	j) include Design Code in the submission;						A Design Code will be included in the Design and Access Statement which will form part of the DCO application.	N
	k) would detached stack require ancillary structures.						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.	N

Account taken of Phase One landscape, design and appearance comments

- 4.6.24 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.
- 4.6.25 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 the 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.
- 4.6.26 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 least visually intrusive option, has been selected.

- 4.6.27 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 Enfield Ditch and meadow planting along the western boundary.
- 4.6.28 The proposals also include habitat enhancement and creation. 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.

4.7 Cooling system

4.7.1 The comments raised in respect of the cooling system during Phase One Consultation are summarised in Table 4.7, together with the Applicant's response.

Table 4.7: Comments on the cooling system received at Phase One Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
Cooling system options								
4.7.2	Agree with NLWA's assessment of the cooling system options.	-	WCC	-	5	26, 27, 33, 40, 48	Noted.	-
4.7.3	Support air cooled condenser because wastes less water and does not have a plume.	-	-	-	4	22, 24, 27, 50	Noted.	-
4.7.4	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.	N
4.7.5	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.	-
4.7.6	Support water cooling system with caveat that there has not been sufficient information.	-	-	-	2	27, 31	Noted.	-
4.7.7	No preference between two options.	-	-	-	1	25	Noted.	-

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
Plume								
4.7.8	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.	N
4.7.9	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.	-
4.7.10	Other comments including the need for more publicity about the plume, query about plume composition and query about the water scrubbing system.	-	-	-	5	9, 37, 39, 45, 1006	The plume from a water cooled system is water vapour only and contains no combustion exhaust gases. NLWA understand that in the absence of regular communications, the composition of the plume will not be understood by those who see it or who live and work nearby and is likely to be mistaken for smoke.	N
Criteria and concerns								
4.7.11	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.	-
4.7.12	Choose most cost-efficient system.	-	-	-	3	16, 21, 23	Noted.	-
4.7.13	Choose system with no odour.	-	-	-	2	16, 23	Noted.	-

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
4.7.14	Choose system with least impact on residents.	-	-	-	1	5	Noted.	-
4.7.15	Release only clean, toxin-free vapour.	-	-	-	2	16, 22	With both air and water cooling only toxin-free vapour would be released.	N
4.7.16	Concern regarding legionella and how it will be prevented.	-	-	-	1	6	Noted.	-
4.7.17	No concerns.	-	-	-	1	48	Noted.	-
Other comments/questions on cooling system								
4.7.18	Other questions including: a) if cooling system impacts on heat output to local network;	-	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.	N
	b) if an energy-consuming cooling agent is required;						No energy-consuming agents are required for the cooling system which relies on condensation of water.	N
	c) if steam tubes could be diverted through the earth for cooling instead.						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.	N

Account taken of Phase One cooling system comments

- 4.7.19 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.
- 4.7.20 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 were sought on this topic.

4.8 Traffic and transport

4.8.1 The comments raised in respect of traffic and transport during Phase One Consultation are summarised in Table 4.8, together with the Applicant's response.

Table 4.8: Comments on Traffic and Transport received at Phase One Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
Impact on road traffic levels								
4.8.2	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 Transport Assessment to be submitted with the DCO application. An interim draft of the Transport Assessment will be available during Phase Two Consultation. This will include the detailed trip generation and assessment of these trips on the local transport network.	N
4.8.3	Concern regarding cumulative traffic impact of the proposals in combination with works at the nearby sewage plant and local housing development.	-	-	-	1	24	The Transport Assessment 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 Transport Assessment to be	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							submitted with the Development Consent Order (DCO) application.	
4.8.4	Proposals may lead to reduced traffic overall as more waste treated locally.	-	WCC	-	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 Edmonton EcoPark. The findings of the detailed trip generation exercise will be included in the Transport Assessment to be submitted with the DCO application.	N
4.8.5	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 Transport Assessment to be submitted with the DCO application.	N
4.8.6	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 Code of Construction Practice (CoCP), this will be agreed with LB Enfield and TfL for each activity where works are required outside of the core working hours. The CoCP 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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							case, the majority of waste deliveries would be received between 06:00 and 17:00.	
4.8.7	Support for new access points to relieve traffic congestion	-	-	-	2	10006, 10020	Support for the new access points is welcomed and noted.	-
4.8.8	a) 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.	N
	b) separate construction operation entrances;							
	c) hubs where fewer but larger vehicles are filled locally;						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.	N
	d) sensible traffic regulation during all phases;						The Code of Construction Practice includes mechanisms for traffic management during construction. During operation, traffic would be managed in a similar manner to the existing site.	N
	e) do not park on the North Circular slip road.						No parking would be permitted on any A406 North Circular Road slip roads.	N
Impact on residents								
4.8.9	Concerns regarding the impact of increased traffic on residents' quality of life.	-	-	-	2	24, 10018	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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							<p>characterised by high traffic flows including heavy goods vehicles travelling to the industrial area to the north of the Edmonton EcoPark on Ardra Road.</p> <p>As part of the Preliminary Environment Information Report (PEIR) the potential effects of the construction and operational traffic have been assessed. The PEIR will be available during Phase Two Consultation. A full Transport Assessment and Environmental Statement will also be submitted with the DCO application.</p>	
4.8.10	Minimise night time traffic in residential areas.	-	-	-	1	47	As with the current site operation, the majority of waste deliveries would be received between 06:00 and 17:00. The Edmonton 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.	N
4.8.11	Large vehicles should avoid Hall Lane.	-	-	-	1	22	Hall Lane is not one of the primary access routes to the Edmonton EcoPark. However a small number of trips, predominately from waste collections in the local area, would use this route.	N
4.8.12	Avoid schools.	-	-	-	1	21	<p>Construction traffic routes would be agreed with LB Enfield and TfL prior to construction and your point is noted.</p> <p>The routes for operational vehicles travelling to/from the site are expected to remain similar to the existing routes.</p>	N
Impact on other road users and pedestrians								
4.8.13	Concern regarding impact of large vehicles on road	-	-	-	2	9, 11	The composition of vehicles visiting the Edmonton EcoPark would not be significantly	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	users generally and specifically in terms of safety						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 Code of Construction Practice which will be available during Phase Two Consultation.	
4.8.14	<p>Concerns regarding safety risk to cyclists and pedestrians</p> <p>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.</p> <p>Promote measured/responsible driving through driver awareness training and ensuring mobile phones are not used by lorry drivers whilst driving.</p> <p>Provide cycle facilities such as segregated cycle lanes, or segregated pedestrian and cycle lanes along Lee Park Way.</p>	-	-	LVRP A*	6	6, 9, 10, 11, 21, 10006	<p>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.</p>	C
4.8.15	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 Code of Construction Practice which will be available during Phase Two Consultation.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
4.8.16	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.	N
Impact on existing infrastructure and nearby development								
4.8.17	Concern regarding impact of traffic on National Grid gas pipeline, Lee Navigation Corridor and Lee Park Way.	NG	-	LVRP A*	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 PEIR which will be available during Phase Two Consultation. The full assessment will be set out in the Transport Assessment to be included in the DCO application.</p> <p>Vehicles would access the eastern side of the Edmonton 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>	N
4.8.18	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 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.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							The potential effects of heavy vehicles will be assessed in the Transport Assessment to be included in the DCO application.	
4.8.19	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.	N
4.8.20	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.	-	-	LVRP A*	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.	N
Further assessments are required								
4.8.21	Further studies/detail requested on the following: a) the Construction Logistics Plan to include more information on management of trips, deliveries and parking;	GLA	LBE	-	2	25, 10016	A Code of Construction Practice (CoCP) 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.	N
	b) more detail on sustainable transport measures; c) baseline employee trips assessment;						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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							completed prior to the completion and occupation will provide details of the baseline employee assessment.	
	d) ongoing review by TfL.						TfL has been consulted regularly throughout the pre-application process. Details of engagement will be set out in the Consultation Report and Transport Assessment to be included in the DCO application.	N
No concerns/proposed measures are sufficient								
4.8.22	No concerns/would have minimal impact/proposals are necessary.	-	-	-	5	18, 19, 50, 10008, 10009	Noted	-
4.8.23	Proposed mitigation measures are sufficient.	-	-	-	3	26, 27, 40	Noted	-

Account taken of Phase One traffic and transport comments

- 4.8.24 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, was published in Phase Two Consultation. Requests for information included cumulative impact assessment and information about water transport – this was provided during Phase Two Consultation.
- 4.8.25 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.
- 4.8.26 Consultation comments generally supported additional access points to the site. In response two new access points have been incorporated into the design.

4.9 Community benefits

4.9.1 The comments raised in respect of community benefits during Phase One Consultation are summarised in Table 4.9, together with the Applicant's response.

Table 4.9: Comments on community benefits received at Phase One Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Community benefits								
Community impact								
4.9.2	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 Environmental Statement which forms part of the Development Consent Order (DCO) application. Potential traffic effects both during construction and operation will be detailed in the Transport Assessment. During Phase Two Consultation the emerging findings of the environmental impact assessment will be available in the Preliminary Environmental Information Report (PEIR) and an Interim Draft of the Transport Assessment will be available.</p> <p>The nearest residential properties are located 600m from the site boundary and the Project would see the replacement of an ageing waste treatment with a modern facility.</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Community benefits								
4.9.3	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 set out in the Design and Access Statement and application drawings 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 Environmental Statement 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 PEIR.</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>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Community benefits								
							The Picketts Lock site is located over 2km to the north of the EcoPark and as such is not likely to be significantly affected by the proposal.	
4.9.4	No concerns/mitigation measures are sufficient.	-	-	-	4	21, 27, 10006, 10018	Support for the scheme is noted and welcomed.	-
Visitor centre								
4.9.5	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.	-
4.9.6	<p>Suggestions for the facilities at and operation of the visitor centre including:</p> <ul style="list-style-type: none"> a) support for community education and involvement; b) support for use as a meeting place; c) should be more accessible than current facility; d) should be advertised; e) should include education facilities and materials on waste management and the facility, for the benefit of various groups; 	-	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</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Community benefits								
	f) should include leisure facilities such as a café, a shop, a train ride and telephone facilities g) keeping it clean; h) not having a booking requirement.						to include a café. The lack of space on site prohibits providing a train ride on site. EcoPark House would be maintained to be a clean and welcoming facility.	
4.9.7	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.	N
4.9.8	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.	N
Other community benefit comments								
4.9.9	Regular communication and transparency, including visible and accessible information and clear mechanism for dialogue.	-	WCC	-	8	6, 9, 14, 16, 24, 25, 37, 39, 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.	N
4.9.10	More publicity and/or education in schools to reduce stigma associated	-	-	-	5	9, 18, 37, 42, 10006	We will consider with the Community Liaison Group how to best manage publicity during	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Community benefits								
	with site, particularly regarding the plume.						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.	
4.9.11	Foster sense of community pride, for example by having a striking building design or sponsoring a local Friends of NLHPP group.	-	WCC	-	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.	N
4.9.12	General community engagement and involvement, for example through closer liaison with community sector organisations.	-	WCC	-	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.	N
4.9.13	Support for EcoPark tours.	-	-	-	4	9, 16, 39, 47	Currently site tours are offered and the proposal is that tours would continue when the proposed ERF is operational. Support for these is noted and welcomed.	-

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Community benefits								
4.9.14	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 Regional Park.	N
4.9.15	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.	N
4.9.16	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.	N
4.9.17	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.	N
4.9.18	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.	N

Account taken of Phase One community benefit comments

- 4.9.19 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.
- 4.9.20 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.
- 4.9.21 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.

4.10 Views on the consultation process

4.10.1 The comments raised in respect of the Phase One Consultation process are summarised in Table 4.10, together with the Applicant's response.

Table 4.10: Comments on the consultation process received at Phase One Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
Consultation process								
4.10.2	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.	-
4.10.3	Support with the caveat that information should focus on elements with scope for influence.	-	-	-	1	40	Noted and welcomed.	-
4.10.4	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 in accordance with clear guidelines for consultation on Development Consent Order (DCO) applications. Our proposed approach to consultation was set out in our Statement of Community Consultation. 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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							be published prior to the commencement of Phase Two Consultation.	
4.10.5	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.	N
4.10.6	Suggestion to use simple feedback mechanisms e.g. multiple-choice questions and quick and comprehensive online mechanisms.	-	-	-	1	19	We used 'open' questions rather than multiple choice in order to allow respondents to say as much or as little as 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.	N
4.10.7	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.	N
4.10.8	Suggestion to seek / listen to the public opinion, including format and content of information.	-	WCC	-	3	23, 25, 10020	Noted and welcomed.	-

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
4.10.9	Requests to be further involved in consultation/ assessments.	NG, 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.	N
Events								
4.10.10	Support for the consultation events. States that exhibition materials were straightforward, easy to understand and high quality	-	-	-	2	47, 10019	Noted and welcomed.	-
4.10.11	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 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.	N
4.10.12	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.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
Information and materials								
4.10.13	Satisfied with the level/ quality/ accessibility of info provided in consultation booklet, leaflets and website. Consultation feedback form easy to use.	GLA	WCC	-	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.	-
4.10.14	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 WRATE assessment will be available at Phase Two Consultation.	N
4.10.15	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	GLA	WCC	-	10	8, 16, 21, 38, 40, 42, 54, 10019, 10028	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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	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.						<p>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.</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>	
4.10.16	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.	N
Request for information								
4.10.17	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 of profits from generated electricity.	-	-	-	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 calculated in conjunction with preparation for procurement of the ERF.	N
4.10.18	Information requested on the heating network including use of	-	-	-	3	23, 45, 10021	The Lee Valley Heat Network (LVHN) is being brought forward by Enfield Council.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	pressurised heated steam for community heating systems.						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: www.leevalleyheatnetwork.co.uk	
4.10.19	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.	N
4.10.20	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.	N
4.10.21	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.	N
4.10.22	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.	N
4.10.23	Request for information on air quality including: a) measures to prevent / reduce air pollution; b) the health impact of air pollutants;	-	-	-	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 Environmental Statement which forms part of the DCO application. During Phase Two the emerging findings of this assessment will	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	c) any bulk chemicals to be stored on the site; d) the treatment of residue ashes; e) emissions during start-up/shut-down of combustion units; f) the water scrubbing system.						be available in the Preliminary Environmental Information Report (PEIR).	
4.10.24	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.	N
4.10.25	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 Preliminary Environmental Information Report (PEIR). The Code of Construction Practice for the scheme will include measures regarding the management of noise during construction.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
4.10.26	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 cooling system due to limescale, impact on the heat output of the Lee Valley Heat Network and provision of water pumping station.	-	LBE	-	3	6, 33, 54	This information will be available during Phase Two Consultation.	N
4.10.27	Request for information on the location of the new access points.	-	LBE	-	1	25	This information will be included during Phase Two Consultation.	N
4.10.28	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 http://www.nlwa.gov.uk/docs/26-6-14/3-nlwa-2013-14-annual-report.pdf	N
4.10.29	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	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							flexible space which can be used for education and community uses.	
4.10.30	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 Preliminary Environment Information Report (PEIR) the potential effects of the construction and operational traffic have been assessed. The PEIR will be available during Phase Two Consultation. A full Transport Assessment and Environmental Statement will also be submitted with the DCO application.	N
4.10.31	Request for more information on recycling targets including whether 50% recycling target is a priority for NLWA, how other waste streams will be treated, further information on the RRF and ash recycling.	-	LBE	-	1	10021	Recycling is a key priority for NLWA and its host seven boroughs which are working towards achieving 50% 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.	N
4.10.32	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 Assessment</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.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
4.10.33	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.	N

Account taken of Phase One Consultation process comments

- 4.10.34 A number of respondents supported the consultation process and considered it to be open and accountable. Challenges were that there was no or limited opportunity to influence, or that Phase Two Consultation was not necessary.
- 4.10.35 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, the Phase Two Consultation included two new videos, one covering the site layout and the design of the ERF and the other which explained how an ERF works. A mobile information vehicle was used as part of Phase Two Consultation to reach additional locations promoting the consultation, encouraging people to come along to a consultation exhibition and/or respond to the consultation. Three new exhibition locations were also added as follows: the Neighbourhood Resource Centre in Haringey, Oasis Academy in Hadley and Parkside Primary School in Chingford. Pop up stands to promote the exhibitions were also added for Phase Two Consultation at Edmonton Green Library, Nuffield Health Centre and Fore Street Library.
- 4.10.36 Chingford was specifically noted by one respondent as an area which should be consulted, this area was therefore covered during Phase Two Consultation as follows:
- one of the mobile information vehicle venues was in Chingford;

- b. advertising took place at Chingford Station;
- c. a consultation exhibition was delivered at Parkside Primary School in Chingford; and
- d. a pop-up stand was located in a local leisure centre to promote the exhibition at Parkside Primary School.

4.10.37 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 was provided during Phase Two Consultation.

5 Phase Two Consultation process

5.1 Introduction

- 5.1.1 This Section sets out how statutory pre-application consultation was undertaken for Phase Two Consultation. It sets out:
- a. whom the Applicant consulted;
 - b. what the Applicant consulted on;
 - c. how the Applicant undertook pre-application consultation; and
 - d. the approach to analysis.
- 5.1.2 In line with paragraph 80 of the statutory guidance, this Section also sets out specifically what the Applicant has done in relation to Phase Two Consultation in compliance with the requirements of the Planning Act 2008 (as amended), relevant secondary legislation, the statutory guidance, and any relevant policies, guidance or advice published by Government or the Planning Inspectorate. This Section also provides explanations for any actions taken where the Applicant has not followed the advice of the local authority or not complied with the statutory guidance or any relevant Advice Note.
- 5.1.3 Phase Two Consultation ran from 18 May 2015 to 30 June 2015, for a period of 44 days. Consultees falling within section 47 and section 42 of the Planning Act 2008 (as amended) were consulted. Publicity under section 48 of the Planning Act 2008 (as amended) was also carried out at the same time as Phase Two Consultation.
- 5.1.4 The proposals for the purposes of Phase Two Consultation covered a larger area than the area that was the subject of Phase One Consultation. The area of land edged red on Figure 5.1 shows the proposed Application Site that was consulted on during Phase Two Consultation.
- 5.1.5 Section 46 of the Planning Act 2008 (as amended) requires that on or before commencing consultation under section 42 of the Planning Act 2008 (as amended), applicants notify the SoS of their intent to submit an application for a DCO and to provide the SoS with the same consultation material that will be provided/is provided to section 42 consultees. A section 46 notice of Phase Two Consultation was sent by the Applicant to the SoS by letter on 15 May 2015. The section 46 notice also enclosed copies of the same consultation materials that were sent to section 42 consultees for Phase Two Consultation, also on 15 May 2015. A copy of the letter sent to the SoS pursuant to section 46 is contained in Appendix C6. That letter lists all the consultation materials sent to the SoS.

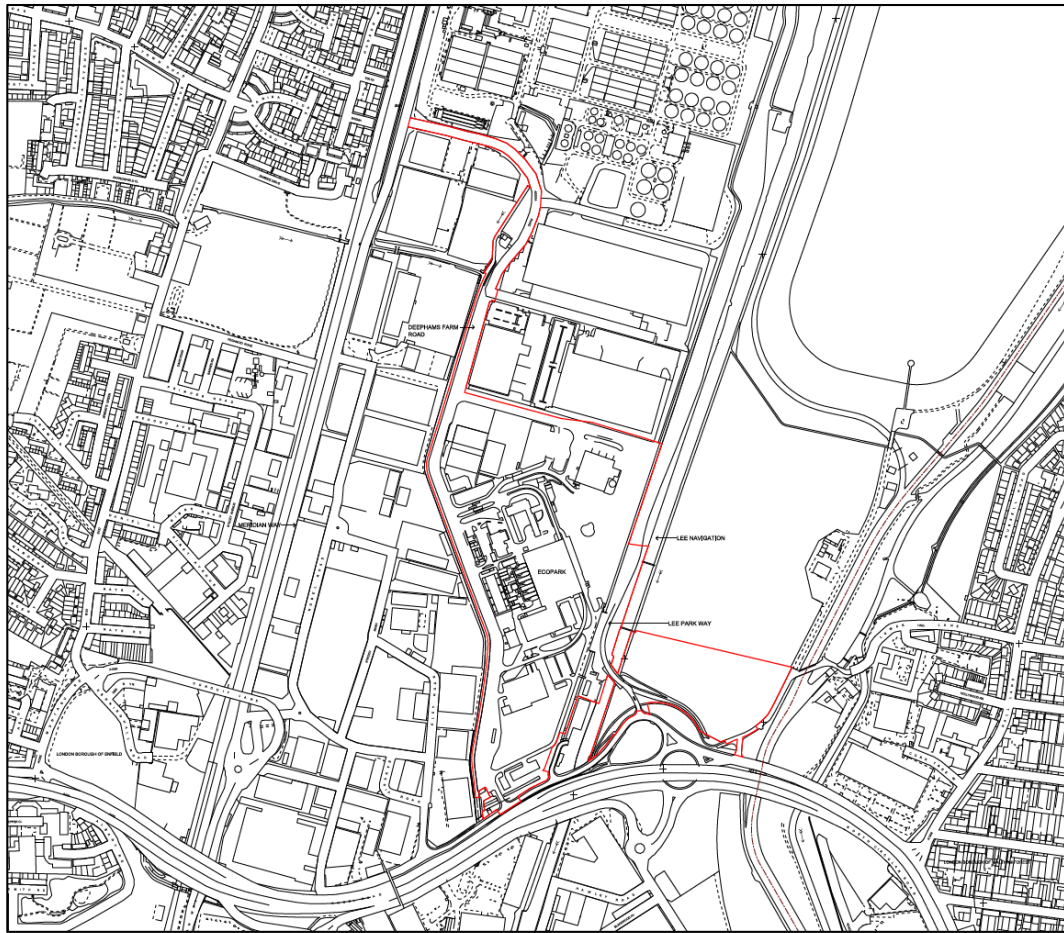


Figure 5.1: Extent of proposals for the purposes of Phase Two Consultation

5.2 Whom we consulted

5.2.1 In accordance with sections 42, 47 and 48 of the Planning Act 2008 (as amended), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended), and as set out in the SoCC, the Applicant consulted with the following consultees:

- a. prescribed consultees (section 42(1)(a) and the APFP Regulations 2009);
- b. local authorities (section 42(1)(b) and section 43);
- c. the Greater London Authority (section 42(1)(c));
- d. 'Land Interests' - persons who fall within one or more of the categories of section 44 (section 42(1)(d));
- e. the local community (section 47); and
- f. the public at large pursuant to section 48.

5.2.2 Whilst not a requirement under the Planning Act 2008 (as amended), as with Phase One Consultation, the Applicant also consulted all the parties on Regulation 9 List of EIA consultees. A copy of the Regulation 9 List of EIA consultees is attached at Appendix B4.

- 5.2.3 Informal non-statutory engagement also continued before and during Phase Two Consultation. Please see Section 7 of this report for further information.

Statutory Consultation in accordance with section 42(1)(a) of the Planning Act 2008 (as amended) - Prescribed Consultees

- 5.2.4 Section 42(1)(a) of the Planning Act 2008 (as amended) requires applicants to consult with certain prescribed consultees on their proposals. Appendices B1 and B2 to this report contain a list of the prescribed consultees consulted during Phase Two Consultation.
- 5.2.5 The following steps were taken by the Applicant to identify the relevant prescribed consultees for Phase Two Consultation:
- the Applicant used the list of prescribed consultees in Schedule 1 of the APFP Regulations 2009 and also applied what Schedule 1 states in terms of the circumstances in which each prescribed consultee is to be consulted. The version of Schedule 1 relied on by the Applicant is the current version in force at the time of writing this report, which incorporates amendments to prescribed consultees introduced by The Infrastructure Act 2015 (Strategic Highways Companies) (Consequential, Transitional and Savings Provisions) Regulations 2015 (the 2015 Regulations);
 - some prescribed consultees in Schedule 1 were not relevant to the proposals that were the subject of Phase Two Consultation. Table 5.1 lists the prescribed consultees in Schedule 1 that the Applicant concluded were not relevant (as per the circumstances set out in Column 2 of Schedule 1), and an explanation as to why it did not consider each one relevant.

Table 5.1: Prescribed Consultees not consulted

Prescribed consultee not consulted	Explanation
The relevant Health Board	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect land in Scotland. As the proposals do not affect land in Scotland, this entity was not considered to be a relevant prescribed consultee.
The relevant parish council, or, where the applications relates to land Wales or Scotland the relevant community council	There is no relevant parish council relating to the land that is the subject of the proposals. Column 2 of Schedule 1 only requires community councils to be consulted for proposed applications likely to affect land in Scotland or Wales. As the proposals do not affect land in Scotland or Wales, community councils were not considered to be a relevant prescribed consultee.
Relevant AONB Conservation Boards	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect an AONB that is managed by a conservation board. As there are no such areas within the vicinity of the land to be affected by the proposal, this entity

Prescribed consultee not consulted	Explanation
	was not considered to be a relevant prescribed consultee.
The Relevant Internal Drainage Board	There is no relevant internal drainage board for the land that is the subject of the proposals.
The Natural Resources Body for Wales	Natural Resources Wales confirmed they did not wish to be consulted.
Office for Nuclear Regulation (the ONR)	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect matters relevant to the ONR's purposes within the meaning of Part 3 of the Energy Act 2013 (as indicated at section 67 of that Act). The proposals do not relate to those purposes and ONR was therefore not considered to be a relevant prescribed consultee.
The relevant local health board	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect land in Wales. As the proposals do not affect land in Wales, this entity was not considered to be a relevant prescribed consultee.
The National Health Service Trusts	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect land in Wales. As the proposals do not affect land in Wales, this entity was not considered to be a relevant prescribed consultee.
The Relevant Northern Ireland Department – the Department of the Environment in Northern Ireland	Column 2 of Schedule 1 only requires this entity to be consulted if the application is likely to affect land in Northern Ireland. As the proposals do not affect land in Northern Ireland, this entity was not considered to be a relevant prescribed consultee.

5.2.6 As mentioned in Section 3 of this report, the content of Schedule 1 of the APFP Regulations 2009 changed between the Applicant's Phase One and Phase Two Consultations. The changes were due to amendments introduced by the 2015 Regulations. The 2015 Regulations came into force on 6 April 2015, which was after the end of the Applicant's Phase One Consultation and before the start of the Applicant's Phase Two Consultation. Table 5.2 sets out all the new prescribed consultees added by the 2015 Regulations to Schedule 1, and whether those new prescribed consultees had been consulted as part of Phase Two Consultation or whether they were not considered relevant.

Table 5.2: New prescribed consultees added by the 2015 Regulations to Schedule 1

Additional prescribed consultees introduced on 6 April 2015 by the 2015 Regulations	Consulted?
The Secretary of State for Transport	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect roads and/or planning on roads for which the Secretary of State for Transport is the highway authority. The only roads for which the Secretary of

Additional prescribed consultees introduced on 6 April 2015 by the 2015 Regulations	Consulted?
	State is currently the highway authority are not within the vicinity of the land to be affected by the proposals. The Secretary of State for Transport was therefore not considered to be a relevant prescribed consultee.
The relevant strategic highways company (Highways England)	Column 2 of Schedule 1 only requires this entity to be consulted for proposed applications likely to affect roads or transport operations and/or planning on roads for which Highways England is the highway authority. The only roads and transport operations for which Highways England is currently the highway authority are not within the vicinity of the land to be affected by the proposals. However, as a precautionary measure, in the event that any of the roads in the vicinity of the land to be affected by the application were subsequently brought within Highways England's remit, Highways England was consulted as part of Phase Two consultation.

5.2.7 When identifying prescribed consultees for the purposes of Phase Two Consultation, the Applicant identified some prescribed consultees who were either known by another name/changed their name/were not in existence. These prescribed consultees are in Table 5.3.

Table 5.3: Prescribed consultees which changed name/were not in existence

Prescribed consultee	Explanation	Consulted under section 42(1)(a)?
The National Health Service Commissioning Board	The National Health Servicing Commissioning Board has adopted the name NHS England since 1 April 2013. The responsibilities of The National Patient Safety Agency and The National Treatment Agency (both of which are prescribed consultees pursuant to section 42(1)(a) of the Planning Act 2008 (as amended), were transferred to NHS England on 1 June 2012.	NHS England was consulted as a section 42(1)(a) consultee for the purposes of Phase Two Consultation.
NHS Institute for Development and Innovation	Since 1 April 2013, the responsibilities of the NHS Institute for Development and Innovation were transferred to NHS Improving Quality (part of NHS England).	NHS Improving Quality was consulted as a section 42(1)(a) consultee for the purposes of Phase Two Consultation.
The British Waterways Board	The British Waterways Board was abolished on 2 July 2012 and its powers relating to inland waterways were transferred to the Canal & River Trust.	The Canal & River Trust was consulted as a section 42(1)(a) consultee for the purposes of Phase Two Consultation.
The Historic Buildings and Monuments	Also known as English Heritage	English Heritage was consulted as a section 42(1)(a) consultee for the

Prescribed consultee	Explanation	Consulted under section 42(1)(a)?
Commission for England		purposes of Phase Two Consultation.

- 5.2.8 The identified prescribed consultees for Phase Two Consultation are listed in Appendix B1 and B2.

Statutory consultation in accordance with section 42(1) (aa) of the Planning Act 2008 (as amended) - the Marine Management Organisation (MMO)

- 5.2.9 As with Phase One Consultation, the proposals that were the subject of Phase Two Consultation did not affect and were not likely to affect any of the areas listed within section 42(2) of the Planning Act 2008 (as amended) that would make it necessary to consult the MMO. The MMO did not respond during Phase One Consultation when the Applicant wrote to it notifying it of its intention to not consult. The MMO was therefore not consulted during Phase Two Consultation.

Statutory consultation in accordance with section 42(1)(b) of the Planning Act 2008 (as amended) – Local Authorities

- 5.2.10 Section 42(1)(b) of the Planning Act 2008 (as amended) requires that local authorities that fall within the categories listed in section 43 are consulted.
- 5.2.11 Section 43 of the Planning Act 2008 (as amended) lists four categories of local authority (Categories A to D) that need to be consulted, which are defined in Section 3 of this report.
- 5.2.12 The proposals that were the subject of Phase Two Consultation covered land that was located solely within LB Enfield. The Applicant's Category B local authority therefore remained LB Enfield for the purposes of Phase Two Consultation.
- 5.2.13 The Applicant's Category A local authorities for the purposes of Phase Two Consultation were:
- London Borough of Barnet;
 - London Borough of Waltham Forest;
 - London Borough of Haringey;
 - Epping Forest District Council;
 - Hertsmere Borough Council;
 - Broxbourne Borough Council;
 - Welwyn Hatfield Borough Council;
 - Essex County Council; and
 - Hertfordshire County Council.
- 5.2.14 As referenced in Section 3, a local authority is a Category C local authority (and must be consulted) if it is an upper-tier county council and the land that is the subject of the application is within that local authority's area. There were no Category C local authorities relevant to Phase Two

Consultation as there are no upper-tier county councils whose areas included the land that was the subject of Phase Two Consultation. Accordingly the Applicant did not consult any Category C local authorities in respect of Phase Two Consultation.

- 5.2.15 Section 43 (2A) of the Planning Act 2008 (as amended) states that a local authority is a Category D local authority (and must be consulted) if it is not a lower-tier authority and shares a boundary at any point with a Category C local authority. As there are no Category C local authorities, there were no relevant Category D local authorities to consult in respect of Phase Two Consultation.
- 5.2.16 Whilst not falling with Categories A to D, the Applicant also consulted the following local authorities because they are three of the seven north London boroughs that make up the Applicant with respect to its statutory waste disposal duty (the remaining four London boroughs are Category A local authorities):
- a. London Borough of Camden;
 - b. London Borough of Hackney; and
 - c. London Borough of Islington.
- 5.2.17 Appendix B1 and B2 contains a list of all local authorities consulted pursuant to section 42(1)(b) of the Planning Act 2008 (as amended) for the purposes of Phase Two Consultation.

Statutory consultation in accordance with section 42(1)(c) of the Planning Act 2008 (as amended) - the Greater London Authority

- 5.2.18 Section 42(1)(c) of the Planning Act 2008 (as amended) requires the GLA to be consulted for projects on land in Greater London. As the area of land affected by the proposals subject to Phase Two Consultation is located within LB Enfield, the GLA was therefore consulted by the Applicant during Phase Two Consultation. The list of Phase Two consultees at B2 includes the GLA as a section 42(1)(c) consultee.

Statutory consultation in accordance with section 42(1)(d) of the Planning Act 2008 (as amended) – Land Interests

- 5.2.19 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:
- a. Category 1: If the applicant, after making diligent inquiry, knows that the person is an owner, lessee, tenant (whatever the tenancy period) or occupier of the land;
 - b. Category 2: If the applicant, after making diligent inquiry, knows that the person (a) is interested in the land, or (b) has power to i) sell and convey the land, or ii) to release the land; and
 - c. Category 3: If the applicant, after making diligent inquiry, believes that the person would or might be entitled to make a 'relevant claim'. A relevant claim is defined in Section 3 of this report.

- 5.2.20 The area of proposals that were the subject to Phase Two Consultation was larger than the land covered by Phase One Consultation. Figure 5.1 shows the land the Phase Two Consultation proposals related to.
- 5.2.21 Land Interests for the area of land relating to Phase Two Consultation were identified well in advance of the commencement of Phase Two, through a second process of diligent inquiry and detailed title investigations, in order to satisfy again: (i) both the statutory consultation requirements; (ii) the compulsory acquisition needs of the proposals consulted on; and (iii) eventually what would be in the Application.
- 5.2.22 As with Phase One Consultation, a multi-faceted approach was adopted in relation to Phase Two to the identification of the relevant Land Interests.
- 5.2.23 The identification of Land Interests built upon those already identified for the purposes of Phase One Consultation (as the proposed Application Site for Phase Two still covered the land that was the subject of Phase One Consultation). This identification process then continued by doing the following in advance of the commencement of Phase Two Consultation:
- a. renewing Land Registry title investigations to establish whether any Land Interests covering the Phase One Consultation area of land had changed. If there were any changes, all relevant underlying documents filed at the Land Registry were obtained;
 - b. submitting plans of the relevant new areas of land being consulted about during Phase Two to the Land Registry and procuring land ownership information, including official copies of all title registers, title plans and underlying documents filed at the Land Registry;
 - c. conducting site visits to verify existence/identity of occupants of the proposed Application Site;
 - d. site visits were also made to establish the presence of unauthorised occupants within the land falling within the boundary of the proposed Application Site. These occupants had been reported to the Applicant by other Land Interests as occupying (as at May 2015) parts of the proposed Application Site. Photographs of the section 42 letter and of the section 48 notices erected at those sites are at Appendix C3;
 - e. having obtained the necessary information, further detailed title investigations were undertaken to further identify all interests noted against the title in each case. Letters were sent directly to certain identified Land Interests to obtain further information about their interest where necessary;
 - f. utilities searches of the relevant new areas of land being consulted about during Phase Two Consultation were carried out;
 - g. notices were erected in prominent positions at locations of unknown land ownership. The notices included plans delineating the extent of the unknown ownership. They were first erected on 18 May 2015 and were checked daily until 22 June 2015. Those notices remained in place until 29 June 2015 when they were taken down. Photographs were taken of the notices erected and a log was kept of when the notices were

checked. A selection of the photographs taken are enclosed within Appendix C3.

- h. letters were sent to the owners and occupiers of land adjoining areas of unregistered land within the proposed Application Site, asking for information about Land Interests in the adjoining land. An example letter is included in Appendix C4.

5.2.24 The area determined by the Applicant as the section 47 consultee zone/newsletter zone took into account all local interests, and so Category 3 owners were sent the same materials as all section 47 consultees. These materials directed all recipients to the full set of consultation materials for both phases of consultation. In this way, all Category 3 owners were given full access to all the consultation materials during both phases of consultation. The size of the section 47 consultation zone/newsletter zone was set at such a size that the Applicant reasonably considered that it would include those property interests, the owner of which would fall into Category 3. However, some Category 3 persons lived/have their registered office address outside the section 47 consultation zone/newsletter zone notwithstanding that the relevant property interest was within it. As such, those Category 3 Owners were each sent a section 42 letter on 15 May 2015.

5.2.25 The list of Phase Two Consultation consultees within Appendix B2 also sets out the Land Interests consulted during Phase Two Consultation.

Statutory consultation in accordance with section 47 of the Planning Act 2008 (as amended) – Local Community

5.2.26 Under section 47 of the Planning Act 2008 (as amended), an applicant must consult people living in the vicinity of the land that is the subject of the application in the SoCC.

5.2.27 Further to the Applicant's SoCC, for the purposes of Phase Two Consultation (and as with Phase One Consultation), the local community included all people living in the vicinity of the proposed Application Site, including the general public, property owners and occupiers, local businesses, community representatives and groups, and people whose land may be directly affected by the proposals.

5.2.28 These local community consultees were consulted at Phase Two Consultation.

5.2.29 The 1,500m section 47 consultee zone/newsletter zone that applied to Phase One Consultation remained the same for Phase Two Consultation. The newsletter zone includes 28,779 properties and 20 schools. Figure 3.2 illustrates the section 47 consultee zone/newsletter zone.

Regulation 9 of the EIA Regulations

5.2.30 The list of those consulted during Phase Two Consultation that is contained within Appendix B1 and B2 includes all those persons on the Regulation 9 List.

Notifying the Secretary of State

- 5.2.31 As referenced in Section 3 of this report, section 46 of the Planning Act 2008 (as amended) requires that on or before commencing consultation under section 42, applicants must notify the SoS of their intent to submit an application for a DCO and to provide the SoS with the same consultation material that will be provided/is provided to section 42 consultees. A section 46 notice of Phase Two Consultation was sent by the Applicant to the Planning Inspectorate by letter on 15 May 2015.
- 5.2.32 A copy of the section 46 Notice relating to Phase Two Consultation is provided in Appendix C6. The section 46 Notice was accompanied by the same consultation materials that were sent to all section 42 consultees in soft copy) in relation to Phase Two Consultation.

5.3 What we consulted section 42 and 47 consultees on

- 5.3.1 Whilst Phase One Consultation gave consultees an early opportunity to comment on the initial proposals for the Project, Phase Two Consultation provided more detail on proposals, including a larger proposed Application Site to consider (a copy of the proposed Application Site for Phase Two Consultation is shown edged red on Figure 5.1), an indication of what the Edmonton EcoPark could look like, the approach to securing design details, landscaping, preliminary environmental information, the cooling system, transport, management of construction, access proposals and EcoPark House.
- 5.3.2 The consultation materials were made available to all section 42 and 47 consultees. Information was available at public exhibitions, on the website, and was sent to section 42 consultees (on a memory stick). Consultation materials were also available in hard copy by post on request. Charges of £5 for a memory stick containing all the information and £650 for a set of printed information were introduced. During Phase Two the Applicant received three requests for copies of the consultation materials to be provided.
- 5.3.3 All consultation materials were sent to all section 42 consultees (on a memory stick) and the SoS pursuant to section 46 of the Planning Act 2008 (as amended).
- 5.3.4 A full list of the consultation materials for Phase Two Consultation can be found in Appendix E7, materials included following:
- a. Background Documents;
 - b. Statement of Community Consultation;
 - c. Section 48 Notice;
 - d. Information documents;
 - e. Consultation Booklet (including feedback questions);
 - f. Phase One Consultation Feedback Report;
 - g. Draft Application documents;
 - h. Book of Plans;

- i. Design Statement;
- j. Preliminary Environmental Information Report (PEIR);
- k. Interim Screening Statement to Inform a Habitats Regulations Assessment;
- l. Interim Health Impact Assessment;
- m. Interim Report on Natural Features;
- n. Interim Needs Assessment;
- o. Interim Alternatives Assessment Report;
- p. Interim Waste Fuel Management Assessment;
- q. Interim Transport Report;
- r. Interim Code of Construction Practice; and
- s. Interim Combined Heat and Power Strategy.

5.3.5 During Phase Two Consultation comments were sought from all section 42 and 47 consultees on:

- a. overall views on the Project;
- b. need for the Project;
- c. information provided in the Preliminary Environmental Information Report;
- d. design principles and the external appearance of buildings;
- e. proposed approach to landscaping;
- f. access proposals;
- g. cooling system;
- h. Temporary Laydown Area;
- i. approach to traffic during operation and construction;
- j. the water transport report;
- k. management of the construction period;
- l. EcoPark House proposals; and
- m. the information provided as part of Phase Two Consultation.

5.3.6 A copy of all the consultation booklet, newsletter, leaflets and advertisements for Phase Two Consultation can be found in Appendix E9, E5, E6, and E2 respectively.

5.3.7 During Phase Two Consultation there were two requests for supplementary information as follows:

- a. the WRATE and Carbon Intensity Floor Modelling Technical Report (a copy of which can be found in Appendix C of the CHP Development Strategy (AD05.06)) was requested and made available on 24 June 2015 in the 'New Information' Section of the Project website. The

organisation who requested this information was also e-mailed to notify them that it has been uploaded to the Project website; and

- b. a request was received for environmental performance data from facilities elsewhere in Europe using the same emissions control technology as that proposed for the Project. Links were provided to relevant publicly available information.

5.3.8 The Phase One Consultation Feedback Report documenting the comments made during Phase One Consultation along with the Applicant's response was made available during Phase Two Consultation on the website and at the exhibitions.

5.4 How we consulted

5.4.1 A variety of consultation methods were used as part of the Phase Two Consultation as summarised below. The approach set out in the SoCC was applied to Phase Two. Many of the methods used in Phase One were repeated in this phase along with some methods additional to those identified in the SoCC to raise awareness including the mobile information vehicle roadshows, posters at local railway stations, handing out leaflets and Oystercard holders at stations and pop-up stands prior to and on the day of exhibitions.

Letters to section 42 Consultees

5.4.2 Letters of notification of Phase Two Consultation were sent to all Phase Two Consultation section 42 consultees listed in Appendix B1 and B2 on 15 May 2015 (Phase Two Consultation section 42 Letters). The Phase Two Consultation section 42 Letters were sent to section 42(1)(a) prescribed consultees, section 42(1)(b) local authorities, the GLA and section 42(1)(d) Land Interests. The letters were accompanied by a memory stick with all of the documents listed at paragraph 5.3.4.

5.4.3 The Phase Two section 42 letters set out:

- a. who the Applicant was;
- b. what the proposals at that time were;
- c. the start of Phase Two Consultation;
- d. a list of all the consultation materials. As with Phase One, all consultation materials were provided on a Project memory stick, which was enclosed in the Phase Two section 42 Letters;
- e. where they could find a copy of the SoCC;
- f. the process for providing feedback; and
- g. the date by which the feedback needed to be provided.

5.4.4 A selection of copies of Phase Two section 42 Letters sent are provided in Appendix C2.

5.4.5 Section 45 of the Planning Act 2008 (as amended) requires that all section 42 consultees are provided with at least 28 days to provide feedback (this 28-day period begins with the day after the day on which the consultee

receives the consultation documents). The Phase Two section 42 Letters requested comments to be given by 30 June 2015. Phase Two section 42 consultees were therefore given more than 28 days to provide feedback.

- 5.4.6 The letters to all Phase Two section 42 consultees were sent in accordance with the same service of notices provisions in sections 229 and 230 the Planning Act 2008 (as amended) as were followed in relation to section 42 letters sent in relation Phase One Consultation. The Applicant sent all the Phase Two section 42 Letters by first class post on 15 May 2015. The Applicant obtained a Certificate of Posting from Royal Mail as evidence of posting the letters.
- 5.4.7 As can be seen from the list of Phase Two consultees in Appendix B1 and B2, the letters were addressed to the people that are specified (as appropriate) in section 229(1)(c) and section 229(1)(f)(ii) of the Planning Act 2008 (as amended) and were sent to the addresses that are also set out in those Sections of the Planning Act 2008 (as amended).
- 5.4.8 Table 6.1 of this report provides an overview of how many section 42 consultees provided feedback. Tables setting out the feedback received and the Applicant's responses to consultee comments are also contained in Section 6 of this report.

Letters to persons listed on the Regulation 9 EIA Regulations List

- 5.4.9 The Applicant sent letters of notification of Phase Two Consultation and the Phase Two Consultation materials on 15 May 2015 to all the persons listed on the Regulation 9 List. A selection of the letters sent is contained within Appendix C2.
- 5.4.10 Those letters were sent in accordance with the service of notices provisions in sections 229 and 230 the Planning Act 2008 (as amended), using the same approach as described above in this Section 5 in relation to letters sent to Phase Two section 42 consultees.
- 5.4.11 The letters sent to Regulation 9 List persons followed the identical format and content of the Phase Two section 42 Letters.
- 5.4.12 The same consultation materials were sent to Regulation 9 List persons that were sent to Phase Two section 42 consultees and to the SoS pursuant to section 46 the Planning Act 2008 (as amended).
- 5.4.13 The letters requested their comments to be given by 30 June 2015. Regulation 9 List persons were therefore given the same amount of time as all section 42 consultees to provide feedback in relation to Phase Two Consultation.

Consultation adverts

- 5.4.14 Advertisements were printed in local newspapers as shown in Table 5.4. It was not possible to include an advert in Islington Life (the Islington Council magazine) during Phase Two Consultation because it was not published during the Phase Two consultation period.

Table 5.4: Phase Two printed advertisements

Publicity	Date of circulation
Our Enfield (Council paper)*	May 2015 edition
Camden Magazine (Council paper)	8 June 2015
Haringey People*	June 2015 edition
Enfield Independent*	20 May 2015 and 27 May 2015
Hackney Today (Council paper)	25 May 2015
Waltham Forest News (Council paper)*	25 May 2015
Enfield Independent	27 May 2015
Hackney Gazette	28 May 2015
Barnet and Potters Bar Times	28 May 2015
Hendon & Finchley Times	28 May 2015
Islington Gazette	28 May 2015
Londra Gazette (in Turkish and English)	28 May 2015
Parikiaki (in English)	28 May 2015
Edgware and Mill Hill Times	29 May 2015
Haringey Independent/Tottenham and Wood Green Independent ¹³ *	29 May 2015
Waltham Forest Independent*	29 May 2015

*publications which are distributed within the section 47 consultation zone/newsletter zone.

- 5.4.15 All advertisements included an overview of the Phase Two Consultation proposals and the closing date for responses. Those publications distributed within the section 47 consultation zone/newsletter zone (as marked with an * in Table 5.4) included dates/times and locations of exhibitions and the closing date for responses. Copies of the newspaper notices are contained in Appendix E3.
- 5.4.16 Advertisements were also placed in the online versions of the newspapers listed in Table 5.5: Phase Two online advertisements.

Table 5.5: Phase Two online advertisements

Online advertisements	Date
North London Newspapers (online) - Tottenham & Wood Green Advertiser; Barnet & Whetstone Press; Edgware & Mill Hill Press; Enfield Gazette & Advertiser; Haringey Advertiser; Hendon & Finchley Press; Potters Bar Press	29 May – 30 June 2015
Enfield Independent online skins and MPU i.e. banners at top and sides of homepage	1-7 June and 24-30 June 2015

¹³ Tottenham and Wood Green Independent and Haringey Independent are the same paper, published as 'Tottenham and Wood Green Independent: Incorporating Haringey'. Their website is at www.haringeyindependent.co.uk.

Online advertisements	Date
Times-Series (Barnet) online and MPU - skins & billboards i.e. banners at top and sides of homepage	1-7 June and 24-30 June 2015
Haringey Independent online – skins & billboards i.e. banners at top and sides of homepage	1-7 June and 24-30 June 2015
Enfield Independent online - MPUs i.e. boxes that appear on all webpages	21 May – 26 June 2015
Guardian-Series (north London wide) online and MPU - skins & billboards i.e. banners at top and sides of homepage	1-7 June and 24-30 June 2015
Enfield Council website- a link to the Project website and piece publicising the consultation	18 May – 30 June 2015
Barnet Council Website - a link to the Project website and piece publicising the consultation	18 May – 30 June 2015
Engage Barnet, Council consultation website - consultation information and link to the Project website and Issue 3 of the newsletter	18 May – 30 June 2015
Camden Council website - a link to the Project website and piece publicising the consultation	18 May – 30 June 2015

5.4.17 A copy of the newspaper can be found in Appendix E2.

Articles and press releases

5.4.18 Articles on the Project were published in the following publications during Phase Two Consultation:

- a. Air Quality News (website, 19 May 2015);
- b. CIWM Journal online (website, 18 May 2015);
- c. Cogeneration and Onsite Power Production online (website, 18 May 2015);
- d. Edie.net (website, 19 May 2015);
- e. Enfield Independent online (website, 12 June 2015);
- f. Lets Recycle (website, 18 May 2015);
- g. Materials Recycling World (website, 18 May 2015 and 2 June 2016);
- h. Renewable Energy News (website, 1 June 2015);
- i. Resource (website, 2 June 2015);
- j. North London Newspapers (online) - Tottenham & Wood Green Advertiser; Barnet & Whetstone Press; Edgware & Mill Hill Press; Enfield Gazette & Advertiser (website 29 May to 30 June 2015); Haringey Advertiser; Hendon & Finchley Press; Potters Bar Press; and
- k. Teru Talk (website, 21 May 2015).

5.4.19 Press releases were also sent to national, regional and local publications and radio stations on 18 May, 1 June and 22 June 2015. A copy of the press releases and a list of publications/radio stations which were sent press releases can be found in Appendix E1.

Social media

- 5.4.20 Social media activity was used to informally promote the Phase Two Consultation. Social media activity comprised promotion on Facebook and Twitter.
- 5.4.21 Customised Facebook adverts promoting the Project were developed to target the local community. In total 12 paid for 'promoted' Facebook posts were issued between 18 May and 30 June. In the same period 41 unpaid Facebook posts were issued.
- 5.4.22 Twitter adverts were also placed in June 2015. During the Phase Two Consultation period 130 tweets were also issued to followers and two paid Twitter campaigns were undertaken to promote the consultation.

Newsletters

- 5.4.23 All properties in the section 47 consultation zone/newsletter zone were hand delivered a copy of Issue 3 of the newsletter between 11 and 12 May 2015. Issue 3 of the newsletter provided information on the proposals that were subject to Phase Two Consultation and the exhibitions. The newsletter 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. During Phase One Consultation two newsletters were produced, whereas in Phase Two one newsletter was produced. This was because Phase one Consultation covered a longer period and included Christmas. The number of newsletters produced was proportionate to the length of consultation for each Phase. A copy of Issue 3 of the newsletter can be found in Appendix E5.

Leaflets

- 5.4.24 Mirroring the process undertaken at Phase One, two versions of the leaflet advertising Phase Two Consultation were produced as follows:
- a. Version 1a - for distribution to locations outside of section 47 consultation zone/newsletter zone. This included full details of the consultation but excluded details of the consultation exhibitions and referred to the proposed ERF as "*a replacement waste facility for north London*"; and
 - b. Version 1b – for locations within the section 47 consultation zone/newsletter zone. This version included details of all the consultation exhibitions and referred to the proposed ERF as a "*replacement facility at Edmonton*".
- 5.4.25 It was not necessary to produce a third version (as was the case in Phase One Consultation) as the exhibitions were not held either side of Christmas as they were during Phase One Consultation.
- 5.4.26 A copy of the two versions of the leaflets is provided in Appendix E6.
- 5.4.27 100 copies of the leaflets were sent to the community drop-off points which were the same as those used in Phase One Consultation. Appendix F1 includes a list of all of the community drop-off points.

- 5.4.28 Three additional organisations/locations were provided copies of leaflets during Phase Two Consultation as follows:
- a. Bush Hill Park Area Ward Forum, 97 Ridge Rd, N21 3EP - sent 50 leaflets and 50 consultation booklets on 23 May 2015;
 - b. The Grange Haringey Community Hub and the Community Hub at 163 Park Lane, both in Northumberland Park – linked community hubs sent 500 leaflets, 30 consultation booklets and 40 Oystercard holders to split between the two locations.
- 5.4.29 Head teachers of all 20 schools in the section 47 consultation zone/newsletter zone, along with the four schools located just outside, were sent 100 copies of the leaflet (version 1b). As a consultation exhibition was held at Parkside Primary School in Chingford 20 additional copies of the consultation booklet and 50 leaflets were provided to the school to promote the event.

Feedback form and consultation booklet

- 5.4.30 A feedback form containing 11 questions was made available in hard copy at the exhibitions and in an electronic version on the Project website. The hard and electronic versions of the feedback form asked exactly the same questions. A PDF version of the feedback form was also available online to be downloaded and posted to the Project's FREEPOST address.
- 5.4.31 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. The consultation booklet was also made available at exhibitions and on the Project website.
- 5.4.32 A copy of both the consultation booklet and feedback form (hard copy and as it appeared on the website) for Phase Two Consultation are included in Appendix E9 and E10 respectively.

Project website

- 5.4.33 As noted in paragraph 3.4.38, a dedicated website for the Project was launched on 20 November 2014, in advance of the start of Phase One Consultation (www.northlondonheatandpower.london). The website was updated with Phase Two information on 18 May 2015.
- 5.4.34 Website visitors in the period between the end of Phase One and beginning of Phase Two Consultation were informed of the start date for Phase Two Consultation by a pop-up message on the home page of the Project website.
- 5.4.35 The website remained live throughout the duration of Phase Two Consultation, and until the Application was submitted.
- 5.4.36 During Phase Two Consultation the website provided electronic versions of all the information published, as well as providing a link to the consultation booklet and feedback form. A PDF version of the feedback form was also available to be downloaded and posted to the Project's FREEPOST

address. A selection of pages from the Project website is attached at Appendix E13.

- 5.4.37 The frequently asked questions Section on the website was updated during Phase Two Consultation to provide additional information to consultees on common issues and questions.
- 5.4.38 Two new videos (in addition to the one created for Phase One Consultation) were created to advertise the Project, and raise awareness among members of the public about the Application and the public consultation. These were uploaded on the Project website.
- 5.4.39 More information on the Project website can be found in paragraphs 3.4.38-3.4.40.

Telephone line

- 5.4.40 The dedicated telephone line (020 8489 3940) was made available for queries about the Project throughout Phase Two Consultation. As for Phase One Consultation it was not possible to submit responses to the consultation through this phone line. This was to avoid the risk of oral responses being subject to misunderstanding or interpretation. Respondents were directed to the website to submit a response, or were requested sent a hard copy of the feedback form for postal comments.

E-mail

- 5.4.41 A dedicated e-mail address (info@northlondonheatandpower.london) was made available for queries throughout the duration of Phase Two Consultation. Response to consultation could also be submitted via this e-mail address.

Community briefings

- 5.4.42 To promote the exhibitions and the consultation, local community briefings were offered to local community representatives alongside the exhibitions.
- 5.4.43 The basis on which these briefings were held are the same as for Phase One Consultation, and details can be found in paragraphs 3.4.43 to 3.4.46. Community groups were made aware of the opportunity to have a briefing through the following methods:
 - a. as part of the NLWA's existing engagement with the South East Partnership Board and West Enfield Partnership Board, these groups, updates on the Project were provided and a presentation was offered to groups who might be interested;
 - b. NLWA and local ward Members were encouraged to provide details of any community groups that they knew about. One Member identified the Elders' Group as a group which might potentially be interested in a community briefing. A briefing was subsequently given to this group on 9 June 2015; and
 - c. some of the community drop-off points, which were provided copies of leaflets, were locations which community groups use to meet.

5.4.44 During Phase Two details about the consultation were not included in Enfield Voluntary Action's newsletter like they were for Phase One Consultation. This was because for Phase One the Project was included as a short Section of text in a long e-mail and no groups got in contact with the Applicant as a result.

5.4.45 Briefings were given to all groups who requested one. The briefings given are summarised in Table 5.6.

Table 5.6: Phase Two community briefings

Briefing to	Date
Elders group, Tottenham Hale Leisure Centre, N14 4JA	9 June 2015
Bountagu Residents' Association, Bounces Road, N9 9LP	12 June 2015
Residents of Angel Community Together (REACT), Raynham School, N18 2TQ	17 June 2015

Public exhibitions

5.4.46 As at Phase One Consultation, during Phase Two Consultation a programme of public exhibitions was held in the vicinity of the Edmonton EcoPark to give consultees the opportunity to find out more about the Project and to give their responses to feedback.

5.4.47 Details of the Phase Two Consultation exhibitions were advertised in the newsletter, leaflets and adverts described above as well as on the Project website. Details of the exhibition locations and opening hours are set out below:

- a. Lee Valley Athletics Centre, Enfield: Wednesday 3 June 2015, 12:00 – 18:00; Friday 12 Jun 2015, 17:00 – 21:00;
- b. Oasis Academy Hadley, Enfield: Friday 5 June 2015, 17:00 – 21:00; Saturday 13 June 2015, 10:00 – 16:00;
- c. The Artzone, Edmonton Green Shopping Centre, Enfield: Saturday 6 June 2015, 12:00 – 18:00; Tuesday 9 June 2015, 16:00 – 21:00¹⁴;
- d. Parkside Primary School, Chingford, Waltham Forest: Wednesday 10 June 2015, 16:00 – 20:00; and
- e. Neighbourhood Resource Centre, Haringey: Thursday 11 June 2015, 16:00 – 20:00.

5.4.48 The exhibitions displayed information to inform visitors about the Project. The same information was displayed as that made available on the Project website.

5.4.49 The following information was available at the Phase Two exhibitions:

¹⁴ The Green Towers exhibition venue used in Phase One was replaced by the Artzone exhibition venue in Phase Two Consultation. Both venues are located in Edmonton Green Shopping Centre however feedback suggested that Green Towers had been difficult to find. The exhibitions in the Artzone were also promoted with a pop-up stand in Edmonton Green Library on the day of the exhibition allowing a member of the team to direct people to the consultation exhibition venue. A small leaflet was also produced showing how to get to the consultation exhibition which was handed out from the pop-up stand.

- a. information boards;
- b. three videos about the Project;
- c. consultation booklet;
- d. feedback forms;
- e. Phase One Consultation Report;
- f. draft application documents (see paragraph 5.34);
- g. other technical background reports (see list in Appendix E7); and
- h. SoCC.

5.4.50 A copy of the information boards is contained in Appendix E11.

5.4.51 As during Phase One Consultation, tours of the Edmonton EcoPark including the existing EfW facility were offered to people attending exhibitions. Tours on Saturdays were offered in addition to the regular Wednesday tours.



Figure 5.2: Phase Two Consultation exhibition at Oasis Academy Hadley

Additional measures introduced to raise awareness during Phase Two Consultation

5.4.52 During Phase Two Consultation the following additional measures were used to raise awareness of the consultation. These were in addition to the formal publication of the consultation as set out in the SoCC. The following measures were used:

- a. mobile information vehicle;
- b. pop-up information stands prior to and on the day of exhibitions;
- c. posters at local railway stations; and
- d. handing out leaflets and Oystercard holders at stations.

5.4.53 The mobile information vehicle was located in the followings locations:

- a. Tesco, 1 Glover Drive, Edmonton, N18 3HF (26 to 27 May 2015);

- b. Sainsbury's, 11 Walthamstow Avenue Chingford, E4 8ST (28 to 29 May 2015); and
- c. Asda Edmonton Green, 1 West End Mall, Edmonton, N9 0AL (30 May 2015).

5.4.54 The mobile information vehicle showed the introductory video and contained copies of the Consultation Booklet, leaflets and feedback form. A members of the Project team handed out leaflets encouraging people to attend an exhibition.

5.4.55 Pop up information stands were located as follows:

- a. Fore Street Library (5 May 2015);
- b. Edmonton Green Library (6 May 2015);
- c. Nuffield Health Centre (8 May 2015); and
- d. Edmonton Green Library (9 May 2015).



Figure 5.3: Photograph of the mobile information stall

- 5.4.56 The pop up information stands comprised the introductory banner from the exhibitions. A member of the Project team handed out leaflets encouraging people to attend an exhibition.
- 5.4.57 Posters (1.8m high) advertising Phase Two Consultation were published in the local railway stations of Chingford and Edmonton Green over the period of 18 May to 22 June 2015. The advertising ran for a slightly shorter period than Phase Two Consultation due to booking schedules. These two stations were chosen as they are both within the section 47 consultation zone/newsletter zone and have relatively high commuter volumes. A copy of these adverts is included in Appendix E4.
- 5.4.58 Leaflets and Oystercard holders advertising Phase Two Consultation were distributed at the following local railway stations:

- a. Edmonton Green Railway Station (18 May and 3 June 2015); and
 - b. Chingford Railway Station (18 May and 3 June 2015).
- 5.4.59 Around 800 promotional Oyster card holders and 2,000 leaflets were handed out in total. A copy of the Oyster card holders and leaflets are contained in Appendix E8.
- 5.4.60 An email was sent from LWL on 29 May 2015 to 230 previous visitors to the Edmonton EcoPark between 2011 and 2014, containing information on the Project and how to get involved/provide feedback. In addition, copies of leaflets and consultation booklets (see Appendix E9 and E6) were displayed Edmonton EcoPark throughout Phase Two Consultation. A copy of this e-mail is included in Appendix E12.
- 5.4.61 Additionally on 12 May 2015 the Applicant e-mailed a PDF of Issue 3 of the newsletter to people who had registered on the Project website to be kept informed. The newsletter is a digital copy of the one that was delivered in hard copy to properties in the section 47 consultation zone/newsletter zone.
- 5.4.62 On 29 May 2015 Issue 3 of the newsletter was also e-mailed to the following groups that had responded to Phase One Consultation but had not specifically asked to be kept informed:
- a. Pinkham Way Alliance;
 - b. Enfield Green Party;
 - c. Tottenham and Wood Green Friends of the Earth;
 - d. United Kingdom Without Incineration Network;
 - e. Swift Conservation; and
 - f. Barnet Friends of the Earth.

5.5 Section 48 consultation

- 5.5.1 Section 48 of the Planning Act 2008 (as amended) requires that applicants publicise their application in the prescribed manner.
- 5.5.2 The prescribed manner in which to publicise an application for a DCO pursuant to section 48 is contained within Regulation 4(3) of the APFP Regulations 2009, as amended by the Localism Act 2011 (Infrastructure Planning) (Consequential Amendments) Regulations 2012.
- 5.5.3 Section 48 publicity was carried out in parallel to the Phase Two Consultation. The Applicant produced and published a section 48 notice as follows:
- a. notices in the following newspapers:
 - Enfield Independent (13 and 20 May 2015);
 - Haringey Independent/Tottenham and Wood Green Independent (15 and 22 May 2015)¹⁵;

¹⁵ Tottenham and Wood Green Independent and Haringey Independent are the same paper, published as 'Tottenham and Wood Green Independent: Incorporating Haringey'. Their website is at

- Waltham Forest Independent (15 and 22 May 2015);
 - The Times (18 May 2015); and
 - London Gazette (18 May 2015).
- b. copies of the section 48 notice were also erected next to all notices erected on the proposed Application Site during Phase Two Consultation that were enquiring about Land Interests on 18 May 2015; and
- c. a copy of the section 48 notice was included amongst the Phase Two Consultation materials sent to all Phase Two section 42 consultees on 15 May 2015.

5.5.4 The content of the section 48 was as follows:

- a. name and address of the Applicant;
- b. a statement that the Applicant intends to make an application for a DCO;
- c. a statement that the Application is EIA development;
- d. a summary of the main proposals and identify local of those proposals;
- e. a statement that the documents, plans and maps showing the nature and location of the proposed development were available for inspection free of charge at places and times set out in the notice (at least one of the addresses must be in the vicinity of the proposed development). The documents available were identical to those available to section 42 and section 47 consultees as part of Phase Two Consultation as listed in Appendix E7.
- f. the latest date by which the documents would be available at those locations was 5pm on 30 June 2015 (the same deadline for receipt of responses from Phase Two consultees). The places and times stated in the section 48 Notice where documents could be inspected for free are listed in Table 5.7.
- g. a statement as to the fee the Applicant would charge for the documents (£5 for a memory stick and £650 for a full printed set);
- h. details of how to respond to consultation. The details provided were an email address, a website address and a Free Post address.
- i. A deadline for responses was stated in the section 48 notice as being 5pm on 30 June 2015.

Table 5.7: Places and times stated in section 48 Notice

Location	Contact no.	Opening times
Edmonton Green Library, 36-44 South Mall, London N9 0TN	020 8379 2600	Mon to Thurs 09:00 – 19:00 Fri 09:00 – 17:30 Sat 09:00 – 17:00 Sun closed

www.haringeyindependent.co.uk. The advertisements published on 15 May 2015 and 22 May 2015 have different headings (15 May 2015 reads 'tottenhamindependent.co.uk' and 22 May 2015 reads 'haringeyindependent.co.uk') but form part of the same newspaper publication.

Location	Contact no.	Opening times
Green Towers Community Centre, 7 Plevna Road, Edmonton, London N9 0BU	020 8379 2644	Mon to Fri 08:00 – 17:00
South Chingford Community Library, 265 Chingford Mt Rd, London E4 8LP	020 8529 3035	Mon 10:00 – 18:00 Tues to Thurs 10:00 – 16:00 Sat 10:00 – 16:00 Fri and Sun closed
Coombes Croft Library, High Rd, White Hart Lane, Greater London N17 8AG	020 8489 4560	Mon to Fri 09:00 – 19:00 Sat 09:00 – 17:00 Sun closed
Civic Centre, London Borough of Enfield, Silver Street, Enfield EN1 3XA	020 8379 6890	Mon to Fri: 09:00 – 16:00
Unit 1B, Berol House, 25 Ashley Road, Tottenham Hale, London N17 9LJ	020 8489 3940	Mon – Fri (except bank holiday) 09:00 – 17:00

5.5.5 Copies of all the section 48 notices as placed within newspapers, erected on land (together with a photo of a section 48 notice erected on land) and enclosed with consultation materials, are provided in Appendix C7.

5.5.6 Regulation 11 of the EIA Regulations requires that where the proposed application is for EIA development, an applicant must, at the same time as publishing notice of the proposed application under section 48 of the Planning Act 2008 (as amended), send a copy of the section 48 notice to the "consultation bodies" (as defined in the EIA Regulations) and to any person listed on the Regulation 9 List. The "consultation bodies" in this context are defined by the EIA Regulations as being:

- a. section 42(1)(a) prescribed consultees;
- b. section 42(1)(b) local authorities; and
- c. the Greater London Authority (if the proposed application relates to land in Greater London).

5.5.7 As required, prescribed consultees, the relevant local authorities and the GLA were also sent a copy of the section 48 notice on 15 May 2015. A copy of the letter sent is provided at Appendix C7.

5.6 Responding to further information requests

5.6.1 Individual written queries and phone calls were responded to throughout Phase Two Consultation. A total of 34 information requests were received and responded to during Phase Two Consultation. Of these, 28 requests were made by telephone, and a further six were received via the Project e-mail address. There were two additional enquiries about tours to the Edmonton EcoPark.

5.7 Approach to analysis

5.7.1 The approach to analysing consultation responses is the same as that taken in Phase One Consultation, as described in section 3.6.

5.7.2 Table 5.8 provides an overview of the number of responses received by response type during Phase Two Consultation.

Table 5.8: Number of responses received by response type

Response type	Phase Two Consultation
Email	34
Letter	2
Online response form	36
Offline response form	51
Null response	9
Total	123 (plus 9 null responses)

5.7.3 Table 5.9 details the nine overarching themes used to analyse the consultation responses received in Phase Two.

Table 5.9: List of themes used in the analysis of the Phase Two Consultation responses

Theme	Description
Need for Project	Views on the Energy Recovery Facility, Resource Recovery Facility and EcoPark House, and the need for the Project.
Construction and Demolition	Views on key considerations relating to the management of the construction period.
Cooling System	Views on which cooling systems should be used for the Project.
Design and Appearance	Views on the design principles and the external appearance of the buildings.
Environment	Views on the Preliminary Environmental Information Report.
Landscape	Views on the proposed approach to landscaping at Edmonton EcoPark.
Traffic and Transport	Views on additional site access points, the Temporary Laydown Area and the proposed approach to dealing with operational traffic.
Visitor Centre	Views on the proposals for a Visitors' Centre at Edmonton EcoPark.
Views on Consultation	Views on the information provided as part of Phase Two consultation.

Responding to feedback

5.7.4 All responses received from Phase Two Consultation have been carefully considered and where appropriate taken into account in developing the Project. The process for this is the same as that used in Phase One Consultation, as described in Section 3.6.

Late feedback

- 5.7.5 A late response was received from the Historic Buildings and Monuments Commission for England. This response has not been incorporated into the tables below, but has been considered in the development of the Project as part informal consultation with the Historic Buildings and Monuments Commission for England
- 5.7.6 The Applicant has put a plain English summary of statutory consultation outcomes on its project website for interested members of the general public to read with a link to this report.

6 Feedback from Phase Two Consultation

6.1 Introduction

- 6.1.1 This Section sets out the feedback received at Phase Two Consultation and how this has been taken into account in the development of the Application in accordance with the requirements of section 49 of the Planning Act 2008 (as amended).

6.2 Overview of feedback received

- 6.2.1 The Project website attracted 5,279 visitors during the Phase Two Consultation period covering 6,655 sessions on the site (i.e. visits to the website by a single user), of this number, 5,279 were first time visitors.
- 6.2.2 A total of 123 responses were received during Phase Two Consultation from 116 respondents. Table 6.1 sets out the number of respondents by respondent type.
- 6.2.3 The North London Waste Plan response has been categorised as a Local Authority in this report because the plan is prepared jointly by the seven NLWA Constituent Boroughs, which themselves are local authorities under section 42 of the Planning Act 2008 (as amended).
- 6.2.4 One of the Community Consultee responses is from a residents' neighbourhood group stating it represents more than 3,000 households. For the purposes of the Planning Act 2008 (as amended) all representations from community groups are coded as community consultees in the same way as members of the public.
- 6.2.5 Some respondents submitted multiple responses, whilst the number of responses received was 123, in total 116 people/organisations responded. For the purposes of reporting in the topic tables below individuals/organisations which submitted multiple submission have been recorded using one ID each.

Table 6.1: Number of respondents

Section of Planning Act 2008 (as amended)	Consultee type	Number of responses	Name of respondents
42(1)(a) 42(1)(c)	Prescribed consultees	18	Canal & River Trust; Civil Aviation Authority; Greater London Authority; GTC ¹⁶ ; Health & Safety Executive, Hazardous Installations Directorate; Highways England; Maritime and Coastguard Agency; National Grid; Natural England ¹⁷ ; Office of Rail and Road; OFWAT; Public Health England; Scottish Environment Protection Agency; The Coal Authority; Transport for London; Thames Water Utilities Ltd.; Environment Agency.
42(1)(b)	Local authorities	7	Hertsmere Borough Council; LB Enfield; LB Islington; LB Camden; LB Waltham Forest; North London Waste Plan; Westminster City Council ¹⁸
42(1)(d)	Landowners	2	Lee Valley Regional Park Authority; LondonWaste Ltd.
47	Community Consultees	96	Subject to Data Protection Act

6.2.7 Table 6.2 shows the number of responses to Phase Two Consultation questions, and the number of responses which do not provide comments on the Project.

¹⁶ GTC are a utility network provider.

¹⁷ Natural England submitted two responses.

¹⁸ Westminster City Council are reported as a Local Authority that provided feedback, however they are not a consultee under Section 42 (1)(b) of the Planning Act 2008 (as amended).

Table 6.2: Number of responses by question

Question	Number of comments
1a: What are your views on our proposals, in particular the Energy Recovery Facility, Resource Recovery Centre and EcoPark House?	78
1b: What are your views on the need for the Project?	76
2: Do you have any comments on the information provided in the Preliminary Environmental Information Report?	65
3: What are your views on the design principles and the external appearance of the buildings?	69
4: What are your views on our proposed approach to landscaping?	68
5: Do you have any comments on which cooling system we should use?	76
6a: What are your views on our proposals to make additional site access points?	65
6b: What are your views on our proposals for a temporary laydown area to the east of the site?	60
6c: What are your views on our proposed approach to dealing with traffic during operation?	64
7: Do you have any comments on the information provided in the Water Transport report?	56
8: Is there anything else you think we should consider relating to the management of the construction period?	56
9: What are your views on our proposals for a Visitors' Centre?	68
10a: What are your views on the information we have provided during this phase of consultation?	19
10b: What more information would you have liked to have seen?	15
11: Do you have any other comments in relation to our proposals for a replacement facility?	57
Non-Fitting	37
Total	929

6.3 Feedback and response

6.3.1 The following tables set out the comments by topic and the response to them. The topics are:

- a. Environment;
- b. Landscape;
- c. Design and Appearance;
- d. Need;
- e. Construction and Demolition;
- f. Traffic and Transport;
- g. Visitor Centre;

- h. Cooling Technology; and
- i. Consultation Process.

6.3.2 In the final column a 'C' is used to record that a change has been made to the Project in light of the consultation feedback. Where no change has been made this is recorded as 'N'.

6.3.3 The following abbreviations are used in the tables that follow:

- a. SC: Statutory Consultee;
- b. LA: Local Authority;
- c. LI: Land Interest;
- d. CC: Community Consultee;
- e. CRT: Canals and Rivers Trust;
- f. EA: Environment Agency;
- g. GLA: Greater London Authority;
- h. HBC: Hertsmere Borough Council;
- i. HSE: Health and Safety Executive;
- j. LBC: London Borough of Camden;
- k. LBE: London Borough of Enfield;
- l. LBWF: London Borough of Waltham Forest;
- m. LVRPA: Lee Valley Regional Park Authority;
- n. LWL: London Waste Limited;
- o. NE: Natural England;
- p. NG: National Grid;
- q. NLWP: North London Waste Plan Team;
- r. PHE: Public Health England;
- s. TfL: Transport for London;
- t. TWUL: Thames Water Utilities Ltd; and
- u. WCC: Westminster City Council.

6.4 Environment

6.4.1 The comments raised in respect of environment issues during Phase Two Consultation are summarised in Table 6.3, together with the Applicant's response.

Table 6.3: Comments on the Environment received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
Air quality								
6.4.2	No concerns about the impact on air quality as the proposed measures are sufficient.	GLA	LBWF	-	0		Noted	N
6.4.3	Concern that the quality of air would diminish and that the air quality standards are set too low.	-	-	-	7	61; 69; 74; 77; 10075; 10077; 10120	The impact of the Project on air quality is assessed in the Vol 2 Section 2 of the ES (AD06.02) which concludes that there will be no significant impacts. Emission limit values are set by the EA as part of the permitting regime. However, actual emissions from the ERF are expected to be well below the permitted levels due to the emissions cleaning technology proposed.	N
6.4.4	Concern that the public is exposed to health hazards.	-	-	-	5	69; 77; 85; 10052; 10120	The design takes account of health and safety regulation requirements. There are numerous safeguards in place to ensure that the public are not exposed to health hazards. These include a Code of Construction Practice to manage construction and an Environmental Permit to manage operational emissions. The HIA assesses the potential effects of the Project on human health and concludes that overall the Project is likely to have beneficial health effects at regional and local levels.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
6.4.5	Concern about the odour coming out of the current facility; oppose any food/garden products recycling on site.	-	-	-	3	69; 85; 68	The impacts of the Project on odour is assessed in the Vol 2 Section 2 of the ES. It is expected that there may be improvement in odour conditions when the composting facility is removed. While green and food waste would be bulked up within the RRF for onward transport, this would not involve holding waste on-site for a long time. The ERF and RRF would have measures in place to control odour. Further information is also set out in the Statement on Potential Statutory Nuisances and Mitigation Measures (AD05.15).	N
6.4.6	Suggested mitigation measures include: a) follow the guidelines set out in the Control of Dust and Emissions SPG as well as London Policy 5.17;	GLA; HSE	LBE	-	1	77	Guidelines in the Control of Dust and Emissions SPG and London Plan Policy 5.17 have been followed as set out in the air quality assessment in the Vol 2 Section 2 of the ES. This is consistent with guidance by Institute of Air Quality Management also used in the assessment.	N
	b) tackle climate change by reducing carbon dioxide emissions, adopting sustainable design and construction measures and incorporating renewable energy;						The proposal has sought to minimise carbon emissions through good design, including the use of renewable energy. Details are set out in the Sustainability Statement (AD05.13).	N
	c) demonstrate how the development is minimising its carbon dioxide emissions to meet the targets of the London Plan;						A BREEAM assessment which demonstrates how the Project has sought to reduce carbon dioxide emissions is appended to the Sustainability Statement (AD05.13).	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	d) install the most efficient flue gas cleaning system regardless of the cost.						Both potential flue gas treatment technology options are efficient. Both have been assessed in the ES.	N
	e) if required, seek Hazardous Substances Consent;						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.	N
Ecology/wildlife								
6.4.7	Concern that the development may result in loss of vegetation along the north and east of the site which provides habitat for both protected and non-protected bird, bat and amphibian species; the areas that could be impacted are the River Lee Navigation, Salmon's Brook, Lee Valley SSSI and Lee Valley SMINC	-	LBE	LVRPA	1	77	The loss of vegetation has been reduced as far as practicable and the impact of the small loss of habitat has been considered in the Vol 2 Section 5 of the ES. This takes into account the ecology measures embedded into the Project through the replacement and enhancement of existing habitats and creation of new habitats. This includes 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. Further information on planting is contained in the Design Code Principles (AD02.02).	N
6.4.8	Suggested mitigation measures include: a) mitigate light pollution to reduce the impact on nocturnal species; the canal	GLA; NE	LBE	LVRPA	0	-	The Project's approach to lighting is set out in the DAS (AD05.07), the approach has been informed by the ecological surveys. It is proposed that there is a dark corridor maintained along the River Lee Navigation. The Code of Construction Practice	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	area should be preserved as a wildlife and 'dark' corridor;						(AD05.12) also sets out measures relating to lighting during construction.	
	b) put in place sufficient measures to protect and enhance habitats and minimise the impact on local wildlife sites;						The proposals include habitat enhancement and creation including tree planting and scrub planting along the site's eastern boundary, as well as marginal planting along Enfield Ditch. Green and brown roofs are also proposed on the ERF and EcoPark House.	N
	c) use efficiently the green area adjacent to the existing facility to enhance the SMINC;						Meadow seed mix would be introduced in this area.	N
	d) ecologists should carry out ongoing monitoring, particularly of the Chingford reservoir;						The No Significant Effects Report (AD05.17) demonstrates that the Project will not have any significant effects on Chingford Reservoir SSSI, and so it is not necessary to carry out ongoing monitoring.	N
	e) contact Natural England's Licensing Unit to check if wildlife licenses would be required;						Natural England has confirmed that no protected species licences are required.	N
	f) where possible undertake works outside breeding times for wildlife;						Section 7 of the Code of Construction Practice includes a timing restriction on the removal of hedgerow, trees and shrubs to mitigate potential impacts on breeding birds.	N
	g) continue discussions with the Environment Agency to						Discussions with the EA on a range of topics, including water resources, are on-going.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	assess impacts on water resources.							
Noise and vibration								
6.4.9	Concern that noise levels would increase; call for keeping them under control	-	-	-	3	10120; 10077; 74	Construction noise would be managed through the measures set out in the Code of Construction Practice (CoCP). Operational noise would be regulated by the EA through the Environmental Permitting which sets operational noise criteria to be met by the Project. Project design and control measures established at the detailed design stage will need to meet the requirements of the noise permit. The impact of the Project in respect of noise has been considered in the Vol 2 Section 8 of the ES which concludes that there would be no significant effects during construction or operation. The CoCP also requires that a Community Relations Group is established.	N
Socio-economic impacts								
6.4.10	Impact on safety: comply with relevant health and safety requirements, including the Electricity, Safety, Continuity and Quality Regulations.	HSE	-	-	0	-	All applicable Health & Safety regulations will be complied with.	N
6.4.11	Impact on recreational activities: there is a concern that those who use the Regional Park and the River Lee Navigation would be affected.	TfL	-	LVRPA	0	-	Proposals include the enhancement of the eastern boundary of the Edmonton EcoPark through habitat enhancement and creation and marginal planting along Enfield Ditch. Visual impacts on users of the Lee Valley Regional Park and River Lee Navigation are assessed in the Vol 3 of the ES which	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
							concludes that there would be no permanent adverse significant effects. Alternative pedestrian and cycle routes would be provided during construction.	
6.4.12	Suggested mitigation measures include:	-	LBE	-	14	62; 63; 64; 65; 70; 74; 75; 78; 79; 98; 10079; 10080; 10081; 10120	The effect of the Project has been assessed in the ES, Transport Assessment and other Application documents – these assessments have not identified any effects that should be mitigated through a levy/other compensation scheme, and so this is not proposed.	N
	a) introduce Community Levy or other compensation scheme to recompense local residents for the traffic and environmental implications of hosting a facility that would benefit the whole of North London; there is a suggestion that the money could be used for supporting local educational projects and apprenticeships;							
	b) share composting with the community; set up worm composting;						Composting on site is not proposed as part of the Project.	N
	c) recruit locally;						Provisions for ensuring that jobs are made available for local residents are being discussed with LB Enfield and will be secured through a Section 106 Agreement.	N
	d) ensure that any employment opportunities are secured in accordance with the Enfield Council's adopted s106 SPD						Employment opportunities will be secured in accordance with relevant local policy. Details are set out in the Section 106 Draft Agreement submitted as part of the DCO application.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	e) avoid any negative impact on the Meridian Water project.						The scheme design makes provision for landscaping and habitat creation along the eastern boundary of the Edmonton EcoPark. Together with the removal of the existing aging EfW facility and replacement with a new modern facility the scheme is likely to improve the external appearance of the site from Meridian Water. Meridian Water is also considered as a receptor in the ES with no significant environmental effects identified.	
Visual impact								
6.4.13	There is a concern that the height and scale of the development would have significant visual, in places cumulative, impact on the area. Specific sites mentioned are the Green Belt, a nearby Site of Metropolitan Importance, Lee Valley Regional Park and Lee Navigation.	-	LBE	LVRPA	0		The Project has been designed to reduce visual impact from sensitive receptors such as those identified, for example by stepping back the massing of the ERF and landscaping along the eastern boundary of the Edmonton EcoPark. Vol 3 of the ES includes a visual impact assessment which concludes that there may be a significant temporary visual effects during construction, however these are not significant in the longer term. This assessment includes the consideration of cumulative effects with nearby committed developments and concludes that there will be no significant effects.	N
6.4.14	The Camden Aggregates site currently shields some views into the EcoPark. This land will revert back to open space as part of the Lee Valley Regional Park thereby increasing the views and visibility of parts of the EcoPark.	-	LBE	-	0	-	The Camden Plant Ltd. site is not within the control of the Applicant. The visual assessment in the Vol 3 of the ES uses viewpoints that take into account the potential removal of the material storage mounds currently located on the Camden Plant Ltd. site. This is considered to be a	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
							worst-case assessment as the current visual shielding from the aggregate mounds is assumed to be removed.	
6.4.15	The loss of vegetation to the north and the east of the site is expected to contribute to the visual impact of the development on the wider area.	-	LBE	-	0	-	The visual impact of the Project is assessed in the visual impact assessment in Vol 3 of the ES, this takes into account the removal of small amounts of vegetation on the north and east of the Edmonton EcoPark. No long-term permanent significant effects are identified in the assessment.	N
Water resources/flood risk								
6.4.16	The potential impact on the clean water infrastructure is difficult to be assessed at the moment as no detail is available on the changes to demand.	TWUL	-	-	0	-	The potential impact is mitigated through continued use of treated effluent from the Deephams Sewage Treatment Works outflow channel for site process water needs.	N
6.4.17	Suggest surface water management mitigation measures include: a) introduce a SuDs scheme;	TWUL; GLA;	LBE	-	0	-	SuDs are proposed in the form of water attenuation on the ERF roof, rainwater harvesting and attenuation tanks to hold excess water after rain.	N
	b) ensure that the storm flows are attenuated or regulated into the receiving public sewer through on or off site storage;						Flood attenuation tanks are proposed on the Application Site to manage storm water flows. Further details are set out in the Flood Risk Assessment.	N
	c) if connecting to a combined public sewer, ensure that the site drainage is separate and combined at the final manhole nearest the boundary;						Surface water runoff is proposed to be discharged to Enfield Ditch rather than the combined public sewer.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	d) if discharging to a public sewer, seek Thames Water's consent						Discussions with Thames Water are underway and this is addressed in the Draft DCO (Article 17).	N
	e) adhere to the London Plan policy 5.13 and the sustainable drainage hierarchy;						London Plan Policy 5.13 has been followed as set out in the Drainage Strategy which is appended to the FRA (AD05.14).	N
	f) consider introducing rainwater harvesting system.						Rainwater harvesting is proposed as part of the Project.	N
6.4.18	Suggested groundwater management measures include:	TWUL	LBE	-	0	-	Groundwater discharges could only occur during construction. The CoCP sets out measures to minimise groundwater discharges and also prevent contamination from the installation and pipework. The impact has been assessed as not significant in the Vol 2 Section 7 of the ES.	N
	a) minimise groundwater discharges into the public sewer;							
	b) if discharging groundwater into the public sewer, obtain a Groundwater Risk Management Permit from Thames Water;						All applicable consents and licenses will be secured in advance.	N
	c) avoid damaging the London Clay which prevents surface contamination from reaching the chalk aquifer;						The Project has been designed to avoid damaging the London Clay – the ERF is located in the north of the Edmonton EcoPark where the London Clay is thickest. The CoCP sets out measures to protect the London Clay and underlying aquifer during construction.	N
	d) assess risks to groundwater as part of the EIA.						The effect of the Project on groundwater has been fully assessed in the Vol 2 Section 7 of the ES.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
6.4.19	Suggested measures in respect of trade effluent include:	TWUL	-	-	0	-	All applicable consents and licenses will be secured in advance.	N
	a) obtain a Trade Effluent consent;							
	b) fit petrol/oil interceptors to all car parking/washing/repair facilities;						Petrol/oil interceptors are identified as a method which could be used in the Drainage Strategy appended to the Flood Risk Assessment.	N
	c) install and maintain fat trap on all catering establishments; recycle the waste oil to produce bio diesel.						Given that catering establishments are not included in the proposal fat traps are not proposed.	N
6.4.20	Other suggested measures include:	GLA; EA	-	-	1	77	The quality of water discharges will be regulated by the relevant permits which will be secured in advance.	N
	use the best water purification plant to prevent polluted water from reaching water courses;							
	include a detailed flood risk assessment within the EIA focussing on the risks of fluvial, surface water and reservoir flooding;						A full Flood Risk Assessment is included as a free standing application report (AD05.14) and included within Vol 2 Appendix 11.2 of the ES.	N
	where possible improve the waterbody by following the WFD guidelines such as naturalising banks along Salmon's Brook or consider other environmental enhancements.						Works are proposed to improve Enfield Ditch. It is not practical to naturalise Salmon's Brook on the Edmonton EcoPark side as it is adjacent to the utility primary distribution corridor. The stability of the eastern bank must be maintained and access must be maintained.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
Transport								
6.4.21	The following comments were raised:	TfL	-	-	0	-	Framework construction and operation Travel Plans (AD05.11 Appendix J and K) seek to promote site access through a range of measures, for example, a possible shuttle bus, and are not solely focussed on public transport. The Project includes improvements to access into the site, including from public transport stations/stops. Accessibility to public transport for people with mobility difficulties is considered as part of the transport assessment in the Vol 2 Section 10 of the ES.	N
	a) consider the impact on accessibility to public transport for people with mobility difficulties;							
	b) potential need for overspill car park;						Sufficient parking is proposed within the Application Site and overspill parking is not considered to be required. However, in the Transport Assessment the potential effect of overspill parking on road users is considered as a worst-case.	N
	c) impact on cyclists as part of the general road network as well as specific cycle network;						Cyclists have been added as general road users in the transport assessment in Vol 2 Section 10 of the ES. Alternative routes will be provided for cyclists during construction.	C
	d) impact on bus services may not be negligible;						The Transport Assessment demonstrates that the number of anticipated additional bus trips generated by the Project is very low and therefore is considered to be negligible.	N
	e) where there are limited alternative travel choices, there should be a high						Public transport users have been considered as highly sensitive to delays in the transport assessment to address this.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	sensitivity to delay or disruption.							
6.4.22	Transport related concerns can be mitigated through an ongoing engagement.	TfL	-	-	0	-	Engagement with TfL is on-going.	N
General environmental concern								
6.4.23	There is a concern about the long-term environmental impact of the proposed development.	-	-	-	1	10076	The ES assesses the potential long-term effect of the Project and includes mitigation as appropriate.	N
Mitigation measures								
6.4.24	Protecting the environment should be a priority, ongoing monitoring is required.	-	-	-	3	10104; 10107; 10056	The effect of the Project on the environment has been considered throughout the design process. On-going monitoring will be required as part of the Environmental Permit.	N
6.4.25	Other specific suggestions include: a) consider multi-functional green infrastructure;	NE; CRT	LBE	-	2	77; 10079	Green infrastructure in the form of landscaped areas and green/brown roofs is proposed. These will typically perform multiple functions for example enhancing ecological value and reducing visual impact.	N
	b) control windblown litter;						Operational arrangements to ameliorate dust and litter are already in place. Similar measures would continue to be used in future operations.	N
	c) comply with all necessary requirements to avoid disturbing the environment;						Environmental Permit requirements will be followed. Mitigation is also built into the Project design to minimise environmental effects on the environment.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	d) seek advice if a statutory Environmental Impact Assessment is required;						An EIA is required and an ES is submitted with the Application.	N
	e) cost should not be the main factor when identifying mitigation measures;						Mitigation measures have been identified through the environmental assessment process and incorporated into the Project design.	N
	f) plan for the new mitigation challenges posed by the opening of the Lee Park Way and the resulting increased activity;						Lee Park Way is proposed to be used to provide staff and public access to parts of the Edmonton EcoPark as part of the Project and is therefore assessed in the ES. Appropriate mitigation is built into the Project design. There would also be a barrier just past the new Edmonton EcoPark access to preclude through traffic.	N
	g) air quality should be your first, ecology second, noise third and socio-economic impact fourth priority.						Air quality, ecology, noise and socio-economic impacts are all assessed in Vol 2 of the ES.	N
Scope of assessment								
6.4.26	Support the scope of assessment; the proposed mitigation measures are comprehensive.	NE; EA; PHE; TfL; GLA	LBE	-	20	5; 79; 87; 10042;1 0045; 10046; 10047; 10056; 10078; 10081; 10082; 10087; 10090;	Noted	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
						10098; 10102; 10109; 10111; 10115; 10116; 10118		
6.4.27	Challenge the scope of assessment because: a) it does not set out clearly the pros and cons of each option;	-	-	-	3	74; 88; 10052;	Alternatives are considered in Volume 1 of the ES. The Alternatives Assessment Report (AD05.03) also includes more detailed information about the options considered.	N
	b) the assessment of carbon emissions is not comprehensive; it does not look at the carbon outcome of each element, including the selected transport method.						Carbon emissions are considered in the Sustainability Statement and WRATE Assessment (appended to the CHP Development Strategy).	N
6.4.28	The removal of the Camden Aggregates has not been confirmed so the assumptions made with relation to this in the PEIR are incorrect.	TWUL	-	-	0	-	Camden Plant Ltd. does not have planning permission to continue operations at the site it is therefore reasonable to assume that it will not remain in place in the future. By assuming that Camden Plant Ltd. is removed, this provides a worst-case assessment as the current visual shielding from the aggregate mounds is assumed to be removed.	N
6.4.29	Suggestions in respect of the ES methodology include: a) follow the 'Control of Dust and Emissions During Construction and Demolition'	NE; PHE; GLA; TWUL; NG	LBE	-	1	10052	The Planning Guidance referred to has been followed in assessing dust impacts in Vol 2 Section 2 of the ES.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	planning guidance when assessing the dust impact;							
	b) the odour impact should be modelled (dispersion modelling) to determine the 300E/m ³ contour regardless of distance from site						A qualitative odour assessment has been undertaken in the Vol 2 Section 2 of the ES. This concludes that effects would not be significant and there may be an improvement in background odour compared with the existing EfW facility. On this basis it is not considered that odour modelling is required.	N
	c) conduct noise and air quality assessment;						Noise and air quality assessments are included in the ES (Vol Sections 8 and 2 respectively).	N
	d) assess potential cumulative impacts;						The ES includes an assessment of cumulative impacts. The development considered in the cumulative effects assessment have been agreed with LB Enfield.	N
	e) further surveys to assess the impact on protected species may be required depending on the progress of the project;						Natural England has confirmed that no further surveys of protected species are required to inform the Application. The Code of Construction Practice requires further ecological surveys to be undertaken prior to construction where appropriate.	N
	f) include a detailed drainage strategy that sets out current and proposed discharge rates, points of connection to the public sewer and a proposed						A Preliminary Surface Water Drainage Strategy is appended to the Flood Risk Assessment and the Draft DCO requires a detailed drainage strategy to be prepared.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	way of discharging surface water during the construction stage;							
	g) instead of relying on existing EA metrics on air quality, NLWA should make the most of available expertise and commission Government Health and Science bodies and internationally recognised London based researchers to design a forward risk assessment;						The air quality assessment has been undertaken in accordance with latest guidance with regard to the metrics to be assessed and reported.	N
	h) assess the health impact of the Electric Magnetic Fields;						The potential health impact of Electric Magnetic Fields was scoped out of the Health Impact Assessment because it is not anticipated to be an issue. The scope was agreed with LB Enfield and Public Health England.	N
	i) consider National Grid's apparatus;						Existing utilities, including that of National Grid, within and close to the Application Site have been identified in the Utilities Strategy (AD05.10) and will be protected in accordance with the protective provisions set out in the DCO.	N
	j) road networks should be considered as affected (and be subject to air quality assessment) if there is an increase in the traffic flow by 500 AADT;						The air quality assessment in the Vol 2 Section 2 of the ES has been undertaken in accordance with the comment which is consistent with latest air quality guidance.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	k) address the viability of water transport;						The viability of water transport is considered in the Transport Assessment.	N
	l) all proposed quantitative and cumulative assessments should be undertaken.						Quantitative and cumulative impact assessments have been undertaken as part of the ES.	N
Requests for more information								
6.4.30	Air quality:	-	-	-	3	77; 68; 83	Dioxins/furans and the deposition of acid is considered in the air quality assessment of Vol 2 Section 2 of the ES. The changes are identified as not significant.	N
	a) will levels of pollutants such as dioxins, furans and acid gases reduce and, if so, by how much;							
	b) by how much will total load of pollutants reduce;						The effects of the Project on pollutant levels is set out in the air quality assessment Vol 2 Section 2 of the ES.	N
	c) will ash particles be released in the atmosphere;						Ash particles from the ERF will not be released into the atmosphere. Ash would be collected from the ERF and taken off-site to be reused.	N
	d) will the strong smell coming from current facility reduce;						Odour controls would be fitted to the facilities and some odorous processes on the existing site would be removed as part of the development. It is therefore expected that there may be an improvement in odour conditions at the Edmonton EcoPark.	N
	e) provide regular air quality readings to monitor reduction in air pollution;						Air pollutant monitoring is a requirement of the Environmental Permit. Emissions from the existing EfW facility are continuously monitored, and this will also be the case for the new ERF.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	f) provide comparison between WHO's accepted levels of air pollution and those anticipated at the proposed facility.						Appropriate assessment criteria have been identified for the air quality assessment which includes national air quality objectives, EU limit values, Health and Safety Executive environmental assessment levels and WHO guidelines. When compared against these assessment criteria, no significant effects are identified.	N
6.4.31	Socio-economic implications: a) how will local residents benefit from the energy recovered from the facility; will energy be distributed among local residents and will this reduce their energy bills;	-	-	-	8	87; 10081; 10082; 10090; 10095; 10115; 10116; 10119	Electricity from the ERF will be exported to the national grid and will contribute to national energy security. The ERF would be capable of providing heat to a district heating network and safeguarded routes have been provided to the south and north of the Edmonton EcoPark. Specifically, the Lee Valley Heat Network (LVHN) proposes to use heat from the ERF in a district heating network which could connect local homes – the LVHN is not part of the Project although the Applicant is working closely with the promoters of LVHN to facilitate the use of heat from the Project.	N
	b) will public access to the Lea Valley be affected.						The Project will temporarily affect access for pedestrians and cyclists on Lee Park Way which is within the LVRP. Public access along Lee Park Way will be maintained throughout construction however walking and cycling routes will be temporarily diverted. In the long term the Project will enhance access to the Lea Valley through improvements to Lee Park Way.	N
6.4.32	Other environment focussed queries:	CRT	LBE	-	3	66; 78; 10052;	The Temporary Laydown Area forms part of the Project and has therefore been	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	a) what are the environmental implications of having a laydown area;						assessed, and the results of the assessments are incorporated in the ES.	
	b) has the impact of excess dust and dirt during construction been taken into account;						The potential impact of dust and dirt during construction has been taken into account in the Vol 2 Section 2 of the ES and measures to minimise the impact are included in the Code of Construction Practice. Once these measures are implemented there would be no significant effect.	N
	c) provide more information on biodiversity interests and measures proposed to enhance to protect and enhance them;						Measures to protect and enhance biodiversity interests are provided in the ecology Section of the Vol 2 Section 5 of the ES.	N
	d) why has conducting a climate change analysis of all alternatives been deemed impractical;						More information is set out in the WRATE Assessment appended to the CHP Development Strategy which assesses the likely environmental performance, including the global warming potential of four scenarios (all waste to landfill; continuing current operations; new ERF with CHP and sending half the waste abroad and half to landfill). The Alternatives Assessment Report sets out the route of decision making for the choice of technology and other options assessed were used as comparators to the proposed ERF.	N
	e) provide more detail on the proposed increase to current discharge rates into Enfield Ditch;						The proposed discharge rate to Enfield Ditch is the Greenfield Runoff Rate and is less than the current discharge rate to Enfield Ditch. Further information is set out in the Flood Risk Assessment.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	f) confirm the proposed surface water discharge levels and show how these compare to the current levels;						The proposed surface water discharge rates and how these compare to the existing is set out in the Preliminary Surface Water Drainage Strategy appended to the Flood Risk Assessment.	N
	g) provide more detail on the proposed boat canopy alongside River Lee Navigation as it may impact the waterway.						The proposed boat canopy is a matter for detailed design.	N

Account taken of Phase Two environment comments

- 6.4.33 Environment comments received during Phase Two Consultation covered air quality, noise, ecology, socio-economic impacts, visual impact, and water resources; for each topic a range of mitigation measures were suggested.
- 6.4.34 Some respondents noted the importance of ensuring that air quality is not affected by the Project, with others citing concern about odour from the existing facilities on-site. The impact of the Project on air quality is assessed in Vol 2 Section 2 of the ES (AD06.02) which concludes there would be no significant impact.
- 6.4.35 Other comments related to ecology and the need to ensure that the Project does not result in the loss of habitat. Ecology measures have been incorporated into the design, for example marginal planting is proposed along Enfield Ditch and there would be tree and scrub planting along the eastern boundary of the Edmonton EcoPark. The lighting design has also been informed by the ecological surveys.
- 6.4.36 Some respondents cited concern about noise resulting from the Project. During construction the CoCP incorporates measures to manage noise, and during operation noise would be controlled through the Environmental Permit.
- 6.4.37 Several comments noted that the visual impact of the Project should be reduced as far as possible, and that the removal of the Camden Plant Ltd. may increase the Project's visibility. The Project has been designed to reduce the visual impact from sensitive receptors, such as the Lee Valley Regional Park, for example by stepping back the massing of the ERF and landscaping along the eastern boundary of the Edmonton EcoPark. The ES has assumed that Camden Plant Ltd. is removed since it does not have planning permission, and this assumption means that the worst case scenario is assessed.

- 6.4.38 Comments noted that there is potential for the Project to impact on waste resources and flood risk. Many of the mitigation measures suggested have been incorporated into the design, for example the use of SuDs, rainwater harvesting and flood attenuation tanks.
- 6.4.39 Many comment support the scope of the environmental assessment and the mitigation measures proposed. Some of the suggestions for further assessments had already been undertaken and were set out in the PEIR, for example noise, air quality and cumulative assessment.
- 6.4.40 Some comments requested more information on the options considered, and in particular the carbon emissions. The WRATE and Carbon Intensity Floor Modelling Technical Report which considered carbon emission was therefore published during Phase Two Consultation. The Alternatives Assessment also includes information on the options considered.

6.5 Landscape

6.5.1 The comments raised in respect of landscape issues during Phase Two Consultation are summarised in Table 6.4 together with the Applicant's response.

Table 6.4: Comments on landscape received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
Reasons for supporting the proposals								
6.5.2	Proposals are well thought out and should be adhered to.	GLA	-	-	27	10117; 10100; 10113; 10115; 10096; 10098; 10099; 10092; 10094; 10095; 10089; 10090; 10091; 10086; 10087; 10088; 10080; 10083; 10084; 10078; 10056; 10045; 10047; 95; 86; 99; 78	Support is noted and welcomed.	N
6.5.3	The proposed landscaping will improve the look of the local area and make it look less industrial.	-	WCC	-	23	10098; 10088; 10118; 10119; 10111; 10112; 10116; 10106; 10108; 10109; 10102; 10103; 10105; 10093; 10097; 10101; 10081; 10082; 10085; 94; 80; 68; 10046	Support is noted and welcomed.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
6.5.4	Overall the landscaping approach, including planting more trees and shrubs, would benefit the natural environment.	-	-	-	3	10104; 10107; 10114		N
6.5.5	Support green (brown) roof/walls as they provide ecological, drainage and visual benefits.	GLA	LBE	-	3	82; 83; 79		N
6.5.6	Other reasons for supporting the landscaping proposals include: a) the area would become popular with visitors; b) easy to maintain; c) create a visual buffer along the canal; d) provide ecological enhancements as well as sustainable water management; e) support habitat creation; f) integrate with the wider landscape.	GLA	LBE	LVRP A	2	10110; 5		N
Reasons for challenging the proposals								
6.5.7	There are concerns that the landscaping proposals: a) do not integrate with the wider landscape;	-	-	LVRP A	3	10120; 10079; 10077	The landscaping has been designed to integrate with the wider landscape through habitat enhancement and creation including open woodland, tree planting and scrub planting along the Edmonton EcoPark's eastern	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
							boundary, as well as marginal planting along Enfield Ditch. Landscaping would also be provided along on the western edge of the River Lee Navigation opposite the Edmonton EcoPark.	
	b) are difficult to imagine in practice;						Further information on landscape, including examples of proposed landscaping, is provided in the Design and Access Statement (AD05.07).	N
	c) might not benefit the wider community unless residents have access to the landscaped areas;						Part of the landscaping proposed is located outside of the Edmonton EcoPark along Lee Park Way and is therefore accessible to the public. The landscaping along the eastern edge of the Edmonton EcoPark will also be accessible to members of the public visiting the Reuse and Recycling Centre.	N
	d) planting is an insufficient landscaping measure.						Planting is one element of the approach to landscaping; for further information please refer to the Design and Access Statement and Design Code Principles (AD02.02). Detail of landscaping will be developed prior to implementation.	N
Comments on trees/shrubs/planting								
6.5.8	Planting should encourage habitat creation/establish a wildlife corridor along the waterways	-	-	LVRP A	6	66; 10099; 10118; 82; 79; 10047	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 of	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
							the Edmonton EcoPark and tree planting is proposed around Lee Park Way.	
6.5.9	The following plant types are requested:	NG	-	-	3	79; 87; 77	Wildflowers are included in the planting schedule in the Design Code Principles.	N
	a) wildflowers;						All plants (trees, shrubs, meadow, grass) can be composted and should have a reasonable nutrient content.	N
	b) nutrient rich plants that can be composted;						It is the intention that the vast majority of the trees and shrubs would be native. A small number of ornamental shrubs would be used in locations which require smaller species with high amenity value, for example next to EcoPark House.	N
	c) native species with good biodiversity value;						There are no waterbodies which are considered to be suitable for reed beds.	N
	d) reed beds to clean water run off on the site;						Fruiting native species including blackthorn, hawthorn and rose have been included in the indicative species mixes set out in the Design Code Principles for their wildlife value.	N
	e) fruit bushes;						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 tree and shrub planting is proposed.	N
	f) slow and low growing species (near National Grid overhead line)							

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
6.5.10	Other suggestions include any hard surface that is not used by vehicles/pedestrians to be planted with trees and wild flowers	-	-	-	1	82	There are no areas of hard standing proposed which do not have an operational function. The exception is the former EfW facility plot which will be safeguarded for future waste management uses and therefore would be hard landscaped.	N
Comments on the eastern boundary								
6.5.11	Support for the following landscaping measures: a) embedding the eastern section of the ERF into the topography of the landscape as it would reduce the overall visual impact and provide biodiversity opportunities;	GLA	LBE	-	0	-	Support for the proposed landscaping on the eastern boundary is noted and welcomed.	N
	b) emphasis on the eastern corridor is welcomed but there is a need for high quality spaces between the buildings						The landscaping strategy includes spaces between buildings. It should be acknowledged that the Edmonton EcoPark is an operational waste management site and that it must also ensure that it confirms with all operational requirements.	N
Other specific suggestions/questions/comments								
6.5.12	Other suggestions /requests include: a) should not disrupt local residents;	CRT	LBE	LVRP A	2	10075; 88	The landscaping proposals will not disrupt local residents;	N
	b) should reduce the visual impact;						The landscaping strategy has been designed to reduce the visual impact of	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
							the proposed ERF and RRF, for example through planting along the eastern edge.	
	c) should maximise natural habitat;						The Project proposes the creation of new habitats and enhancement of existing habitats.	N
	d) should comply with DMD policy requirements and Enfield's Biodiversity Action Plan;						The landscaping approach is in general conformity with Enfield Development Management Document and the Biodiversity Action Plan; refer to the Planning Statement (AD05.02) and Design Code Principles for further information.	N
	e) should include the towpath opposite the entrance;						Land opposite the proposed new access off Lee Park Way is not within the Application Site and the Project does not justify landscaping that far north.	N
	f) should include provisions for the cleared site to ensure that some of the lost features (such as the pond) are replaced and that the site overall makes a positive contribution to the visual amenity;						The approach to landscaping will make a positive contribution to visual amenity. Whilst there is not enough space on the Edmonton EcoPark to retain all existing features, such as the ornamental pond, the small loss of habitat is mitigated through new habitat creation and enhancement.	N
	g) should redefine the entrance from Lea Park and Advent Way as a combined Regional Park and EcoPark entrance						The Project includes landscaping improvements along Lee Park Way and resurfacing of the road. These measures, along with EcoPark House, will create an appropriate gateway to	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Landscape								
							the Edmonton EcoPark. The Project will improve the overall environment in this part of the Lee Valley Regional Park (LVRP) however it is beyond the scope of the Project to create a new gateway to the LVRP itself.	
Requests for more information								
6.5.13	Will the green area adjacent to the existing facility be retained post construction and used as an additional space for planting and habitat creation or will it become fragmented by various infrastructure elements	-	-	LVRP A	0	-	Part of the existing green area would be used for the exit ramp from the ERF. The reminder is proposed for meadow and new native tree planting.	N

Account taken of Phase Two landscape comments

- 6.5.14 Many comments supported the Project's approach to landscaping, noting that it would improve the look of the area, provide ecological enhancements, and integrate with the wider landscape.
- 6.5.15 Others considered that the landscaping proposals do not integrate with the wider landscape and that residents would not benefit unless they had access to the landscaped areas. The landscaping has been designed to integrate with the wider landscape through habitat creation and enhancement along the Edmonton EcoPark's eastern boundary. Part of the landscaping proposed is outside the Edmonton EcoPark along Lee Park Way which is accessible to the public.
- 6.5.16 Respondents suggested that planting should encourage habitat creation and a number of plant types were suggested many of which are already incorporated, for example wildflowers and native species.

One comment suggested that the landscaping should include the tow path opposite the new access, this is outside the scope of the Project, however improvements are proposed along Lee Park Way. Another comment considered that hard surfaces not used by vehicles/pedestrians should be planted with trees and wildflowers. There are not any areas of

hardstanding proposed which do not have an operational function with the exception of the former EfW facility plot which will be safeguarded for future waste management use and as such is not appropriate for landscaping.

6.6 Design and appearance

6.6.1 The comments raised in respect of landscape issues during Phase Two Consultation are summarised in Table 6.5, together with the Applicant's response.

Table 6.5: Comments on Design and Appearance received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
Reasons for supporting the proposals								
6.6.2	Looks nice, pleasing to the eye.	GLA	-	-	33	10093; 10117; 10118; 10119; 10114; 10115; 10116; 10105; 10110; 10111; 10098; 10100; 10101; 10095; 10096; 10097; 10091; 10092; 10094; 10086; 10089; 10090; 10080; 10083; 10085; 10075; 10077; 10079; 10045; 99; 80; 78; 87	Support for the design is noted and welcomed.	-
6.6.3	It is welcoming; family and environmentally friendly; responds to the environmental sensitivities of the corridor along the River Lee Navigation.	-	LBE	-	7	10080; 10107; 10112; 10088; 10099; 10104; 10082		-
6.6.4	It looks better than the existing facility/other large buildings in the vicinity.	-	-	-	8	72; 99; 10087; 10113; 10084; 79; 86; 68		-

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
6.6.5	It integrates well with the surroundings, including the river Lee.	GLA	LBE; WCC	-	8	10080; 10108; 10109; 10102; 10103; 10106; 10082; 10100		-
6.6.6	Other reasons to support the proposed design and appearance include: a) the prominent features that make it look like a landmark; b) the split into two separate areas; c) the two-layered approach to the facade; d) the "step" approach; e) the introduction of a design code; f) the fragmentation of the building; g) the raising of the ground towards the eastern elevation.	CRT	LBE; WCC	-	1	94		-
6.6.7	Support with caveats: a) The design looks good but the information is too technical	-	-	-	2	10120; 10076	Support for the design is welcomed. Information on the design was presented in a variety of forms including a video and images which were accessible to all.	N
	b) The design looks good but oppose the facility overall.						Support for the design is welcomed, please refer to the table of responses to comments on the Need theme for information on the overall need for the Project.	

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
Reasons for opposing the proposals								
6.6.8	Elements that are challenged include:	-	LBE	LVRP A	0	-	The scale of the Viewing Platform has been significantly reduced by 7m to 5m/6m height.	C
	a) the viewing platform at the north eastern corner of the ERF building as it is visually intrusive/ obtrusive/ a discordant element; b) if required the viewing platform should be moved away from the eastern boundary.						The Viewing Platform has been relocated to the south eastern edge of the ERF. It remains on the eastern edge as this is the only edge which offers views of the EcoPark and LVRP. Also the eastern edge is within the publically accessible part of the EcoPark.	N
6.6.9	EcoPark House too high and there is no need for the second floor.	-	-	LVRP A	0	-	EcoPark House has been reduced from three storeys to two storeys. Refer to the Visitor Centre Table for more information.	C
Appearance								
6.6.10	The facility should blend in/be appropriate for the area.	-	LBE	-	2	5; 62	The Project is being designed to respond to its surrounding context and minimise its visual impact. The massing of the ERF would step down towards the Lee Valley Regional Park and landscaping would integrate the site into the wider landscape. The use of materials across the Project would be appropriate for its	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
							use and consider the surrounding context.	
6.6.11	The facility should be interesting/attractive/Interactive.	-	LBE	-	2	5; 10081	The ERF would be a new facility of a high quality of design which responds to its surrounding context.	N
6.6.12	Keep it simple, in line with its function.	-	-	-	1	66	The overall design approach to the ERF is simple and in keeping with its function.	N
6.6.13	Suggest the following buildings that can serve as an example: a) Hunderwasser incinerator in Vienna in respect of overall design;	-	-	LVRP A	1	88	The Hundertwasser incinerator is designed to stand out, it is therefore not considered to be a good example for this Project which has been designed to blend in.	N
	b) Cladding design: John Lewis depot in Northampton and Here East in the Queen Elizabeth Olympic Park (although this was noted to be less palatable).						The suggested examples of cladding will be considered at the detailed design stage in line with the Design Code Principles (AD02.02).	N
6.6.14	Other suggestions include: a) aim for a more rounded exterior;	-	-	-	3	83; 10078; 10047	The massing of the ERF has been reduced to use the minimum operational outline. Creating a rounded exterior would create unnecessary volume, increasing the overall scale and massing which is contrary to the Project's design objectives.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
	b) sink as many of the large buildings into the ground as possible;						For operational reasons and the Edmonton EcoPark's location within a groundwater Source Protection Zone it is not appropriate to sink buildings into the ground. However the visual impact of the ERF would be reduced through the appropriate use of materials and landscaping features.	N
	c) install bird's perches;						Bat and bird boxes are proposed within the Application Site.	N
	d) aim for an exterior that does not have unnecessary features prone to dust accumulation;						The Design and Access Statement (AD05.07) explores a functional design, the detail design of the façade will be developed in accordance with the Design Code Principles which state that materials should be chosen to meet all the principles including on-going maintenance requirements.	N
	e) ensure that the cladding can be accessed easily for future maintenance.						A management and maintenance regime will be in place. As detailed in the Design and Access Statement the building design is such that there will be appropriate access for maintenance.	N
Chimney stack								
6.6.15	The design of the chimney stack should: a) be carefully considered and different from the current grey structure;	-	LBE	LVRP A	0	-	The existing EfW facility stack is a circular concrete structure whereas the proposed ERF stack is a rectangular clad structure. The Design Code Principles establish	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
							that the stack should be a light coloured material.	
	b) build a positive image						The stack has been designed as an integral part of the overall proposals which will promote a positive image of the Edmonton EcoPark.	N
	c) not be rectangular.						A rectangular stack is proposed to reduce the visual impact to sensitive areas, by having a narrower edge facing the Lee Valley Regional Park.	N
Colours								
6.6.16	Support the proposed darker colouring scheme for the lower level.	-	LBE		0	-	Support is noted and welcomed.	N
6.6.17	Suggestions for the colour scheme include: a) should not be white as it requires more maintenance;	-	LBE; HBC	LVRP A	1	10047	The colours will be selected at the detailed design stage from the colour palette within the Design Code Principles and an appropriate management regime will be in place.	N
	b) should include accent colours but not orange / should be blue-grey;						The Design Code Principles includes a palette of colours, which will inform the detailed design.	N
	c) should be appropriate to minimise visual impact.						The Design Code Principles would reduce the visual impact by using lighter colours on the upper elements of the ERF. As set out in the Design Code Principles there is	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
							a variety of materials which could achieve this aim.	
Materials								
6.6.18	Oppose the proposed cladding as it is impractical.	-	-	LVRP A	0	-	The Design Code Principles state that materials selected should be durable, low maintenance and appropriate to the function of the building. A management and maintenance regime will be in place.	N
6.6.19	Support the proposed materials for the chimney stack and RRF; the proposed facing materials are of high quality.	GLA	LBE	-	0	-	Noted	N
6.6.20	The materials should: a) require minimum maintenance; b) give a clean-lined appearance; c) provide robust exterior; d) be of high quality.	GLA	LBE	LVRP A	1	10047	Materials will be selected at the detailed design stage in accordance with the Design Code Principles and subsequent approvals process.	N
Other specific design suggestions								
6.6.21	Install solar panels or wind turbines;				2	60; 82	PV panels will be provided on the ERF and/or RRF subject to feasibility and a cost benefit analysis. Roof area has been safeguarded in the proposed design.	C

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
							Wind turbines are not a practical solution for this site, further information is set out in the Building Energy Assessment, appended to the Sustainability Statement (AD05.13).	
6.6.22	Concerns over the design of the bunker, in particular in respect of the maintenance of a single bunker.	EA	-	-	0	-	There are important operational reasons for the proposed design of the bunker which serves to minimise the impact on the environment by improving the process efficiency of the operation of the ERF resulting in lower emissions to the atmosphere.	N
6.6.23	The proposed facility should be of flagship quality.	-	LBE	-	0	-	The ERF would be of a high quality of design.	N
Scale								
6.6.24	The scale is justified and well mitigated	GLA	LBE	-	0	-	Support for the scale of the ERF is noted and welcomed.	N
6.6.25	The development should be smaller.	-	-	-	1	89	The size of buildings is informed by their functional requirements and has been minimised as far as possible without compromising their function.	N
Signage								
6.6.26	Suggestions include: a) should be considered at the design stage;	CRT	LBE	-	0	-	Signage will be considered at the detailed design stage.	N
	b) should link to the lighting strategy;						Signage will be designed to meet operational requirements and will only be lit where required.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
	c) should integrate with existing wayfinding along the Navigation by providing legible London signage at the towpath entrance.						Signage in the Lee Valley Regional Park (LVRP) will be agreed with Lee Valley Regional Park Authority and consistent with LVRP approach to signage.	N
Comments on specific buildings								
6.6.27	Comments on the proposed design of the EcoPark House include:	-	LBE	LVRP A	1	10046	EcoPark House has been reduced from three storeys to two storeys. Refer to the Visitor Centre Table for more information.	C
	a) should be a 2 storey instead of a 3 storey building;						The approach to developing the design for EcoPark House is set out in the Design and Access Statement.	N
	b) alternative design options should be explored to avoid dominating the landscape;						EcoPark House would be a gateway for the EcoPark. It would also overlook and provide activity when viewed from Lee Valley Regional Park.	N
	c) should be incorporated into a gateway entrance that promotes both the Project and the LVRP;						Support for the design is noted and welcomed.	-
6.6.28	d) the design is approved as it both functional and visually attractive.	-	LBE	LVRP A	0	-		
6.6.28	Comments on the proposed design of the ERF include:	-	LBE	LVRP A	0	-	The proposed 'steps' of the ERF relate to the internal components and uses. Introducing more 'steps' would increase the overall bulk and massing of the facility which is contrary to the design objectives.	N
	a) the series of 'steps' should be more intense and incorporate areas of landscape;						Support is noted and welcomed.	-
	b) the proposed approach to the facade is supported.							

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
6.6.29	Comments on the proposed design of the RRF include:	-	LBE	-	0	-	Support is noted and welcomed.	N
	a) its height and massing are acceptable;							
	b) it should be designed to provide a welcoming and attractive public space;						The RRC which is the publically accessible part of the RRF is designed to provide a welcoming and attractive environment.	N
	c) explore the possibility to create separate disposal facilities for the public and businesses.						A RRC for both the public and small business vehicles makes efficient use of space and is in keeping with other RRCs in north London.	N
Further studies are required								
6.6.30	Views analysis to understand the full level of impact on the neighbouring conservation area; the viewpoints should be agreed with GLA officers.	GLA	-	-	0	-	The nearest Conservation Area is located on Tottenham High Road and is therefore not affected by the Project. Viewpoints used in the Vol 3 of the ES (AD06.02) have been agreed with LB Enfield as the local planning authority. Discussions with the GLA have continued however no further comments on this matter have been provided.	N
Requests for more information								
6.6.31	These include: a) full details on the final design and materials used to build the new facility;	GLA; CRT	WCC	LVRP A	2	85; 95	Full details on the final design will be available at the detailed design stage. The Design Code Principles set out guidelines for the design and materials to be used in the detailed design.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Design and appearance								
	b) visualisations of the new facility;						Visualisations of the Project were provided during Phase Two Consultation and more are included in the Design and Access Statement.	N
	c) more information on how NLWA will specify and procure its steam turbine and its heat off-take provisions; request for this information to be presented in a diagrammatic format, showing capacity as well as temperature and pressure levels;						This comment will be taken into account at the procurement stage.	N
	d) is the extra storey in the Visitor centre needed to provide views over the Park and assist in creating a future gateway to this section of the Park;						EcoPark House has been reduced from three storeys to two storeys. Refer to the Visitor Centre Table for more information.	C
	e) more detail on the proposed future use of the EfW plot, whether Lee Park Way could be used as an entrance for future facilities in this area and consequences for the LVRP.						The EfW plot will be available for future waste uses in accordance with the site's designation as a waste site. Any future facilities will need to secure planning permission, at which time the potential effect on the Lee Valley Regional Park would be considered.	N

Account Taken of Phase Two design and appearance comments

6.6.32 Many comments supported the overall design and appearance of the Project, noting that it is an improvement on the existing facilities on-site, integrates well with the surroundings, and is attractive to look at.

- 6.6.33 Some comments challenged the size of the viewing platform on the ERF, in response the Applicant has reduced the height of the viewing platform by 7m to 5/6m. Another comment considered that the viewing platform should be moved away from the eastern edge of the building, the design has not been changed to reflect this suggestion as the eastern edge is the only edge which offers views of the Edmonton EcoPark and LVRP. The eastern edge is also located within the publically accessible part of the site.
- 6.6.34 In response to comments that the height of EcoPark House was too high and the need for three storeys had not been demonstrated the building has been reduced from three to two storeys.
- 6.6.35 Several respondents suggested that the ERF should blend in, with others requesting that it is an interesting design. The Project has been designed to minimise its visual impact and will be of a high quality of design. A number of more detailed suggestions were made including a more rounded exterior and sinking building elements into the ground. A more rounded exterior has not been progressed as this would increase the overall massing of the building. Due to operational reasons and the Edmonton EcoPark's location within a groundwater Source Protection Zone it is not appropriate to sink buildings into the ground.
- 6.6.36 Other respondents referred to other buildings which can serve as examples, where this is in respect of detailed design, for example the type of cladding, this would be considered the appropriate stage in the design process.
- 6.6.37 There were a range of views on the colours to be used, with general support for the approach to have lighter coloured materials on the upper elements. Other respondents suggested specific colours which should/should not be used. The colours of the accent elements would be selected at the detailed design stage in accordance with the Design Code Principles.
- 6.6.38 The materials to be used were noted as an important element in the overall design, one respondent considered the proposed cladding to be impractical, whilst others noted that it must be easy to be maintained and be of a high quality. Further information about the approach to cladding is set out in the Design Code Principles.
- 6.6.39 A comment was made that there should be solar panels. In response the roof area has been safeguarded on the ERF and/or the RRF for PV panels, subject to feasibility and cost benefit analysis at detailed design stage.

6.7 Need

6.7.1 The comments raised in respect of Need issues during Phase Two Consultation are summarised in Table 6.6, together with the Applicant's response.

Table 6.6: Comments on Need received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
Reasons for supporting the proposed facility								
6.7.2	The need for the project is supported.	GLA	WCC; HBC	LWL	46	5; 59; 60; 62; 66; 70; 72; 75; 76; 79; 80; 82; 87; 92; 94; 95; 97; 10116; 10118; 10112; 10114; 10115; 10109; 10110; 10111; 10102; 10103; 10105; 10095; 10097; 10101; 10094; 10087; 10088; 10084; 10085; 10086; 10078; 10096; 10098; 10091; 10092; 10093; 10090; 10045; 10047	Support for the scheme is noted and welcomed.	-
6.7.3	Encourages recycling by generating public interest and providing additional recycling capacity.	GLA	-	-	2	10085; 68		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
6.7.4	It is environmentally friendly: contributes to UK's renewable and low carbon energy targets; reduces air pollution.	GLA	LBE	-	12	68; 72; 77; 78; 99; 10046; 10081; 10088; 10089; 10109; 10110; 10114		
6.7.5	Has the potential to benefit the local community by creating new and securing existing job opportunities; regenerating the area and reducing energy bills.	-	-	LWL	20	68; 78; 83; 99; 10083; 10084; 10087; 10095; 10096; 10099; 10100; 10102; 10103; 10104; 10106; 10107; 10108; 10111; 10117; 10119	We agree that the Project will make a positive contribution to regenerating the area and create employment opportunities, both in the construction phase and operations phase. Whilst it is beyond the scope of the Project and out of the Applicant's control to reduce energy bills for consumers, the Project will make a positive contribution to national energy security (refer to Section 2.1 of the Need Assessment (AD05.04) for details).	-
6.7.6	The existing facility is reaching the end of its life-span.	-	WCC	LWL	0	-	Support for the scheme is noted and welcomed.	-
6.7.7	Offers financial benefits: a) it is cheaper than sending waste to landfill; provides cheap energy; b) the plant would operate in CHP mode with both electrical and heat offtake, which is dependent on the energy technology market and user demand. This allows for seasonal consumption of heat / flexibility to be	GLA	-	LWL	2	10075; 10112		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
	built into the proposal, thereby ensuring that optimum efficiencies and cost effectiveness is secured; c) represents a good value for the residents of North London.							
6.7.8	The project is in line with other plans/policies such as Lee Valley Heat Network (LVHN), London Plan, North London Waste Plan (NLWP); Lee Valley OAPF.	GLA	LBC; LBE; NLWP	-	1	10047	The Lee Valley Heat Network (LVHN) is not part of this Project, however the ERF will be Combined Heat and Power (CHP) enabled and routes for a heat networks are safeguarded, these would allow the LVHN.	-
6.7.9	Less waste is sent to landfill.	GLA	LBE; LBWF	LWL	10	80; 87; 10046; 10081; 10082; 10088; 10095; 10115; 10117; 10118	Support for the scheme is noted and welcomed.	-
6.7.10	Location is suitable as it: a) makes use of the existing site; b) encourages co-location of facilities; c) is large enough.	GLA	LBC; NLWP	LWL	0	-		
6.7.11	Meets future demand for (low carbon) energy while providing a solution for growing waste volume.	GLA	LBE	-	3	10099; 68; 97		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
6.7.12	The new technology will improve both the look and efficiency of the facility.	GLA	LBE; WCC	LWL	21	68; 10046; 10047; 10056; 10078; 10081; 10082; 10083; 10084; 10087; 10088; 10089; 10095; 10097; 10098; 10100; 10101; 10105; 10106; 10108; 10113		
6.7.13	Promotes net self-sufficiency.	GLA	LBE	-	0	-		
6.7.14	Promotes localism: waste is treated locally; provides opportunities for decentralised heat and energy networks.	GLA	LBC; NLWP		2	10112; 62		
6.7.15	Produces energy.	-	LBWF	-	8	79; 10045; 10080; 10099; 10104; 10107; 10114; 10115		
6.7.16	Other reasons for support: provides educational opportunities for school children.	-	-	-	1	10084		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
6.7.17	Support with a caveat - the facility should: a) not be visually obtrusive;	GLA	LBE	-	8	5; 61; 69; 83; 92; 95; 10060; 10093 (Multiple submissions 92; 10060 (Member of the public))	Support for the scheme is noted and welcomed with the following points of response: Due to the size and scale of the ERF there will be some visual impact, and this has been assessed in the Vol 3 of the ES. The design has sought to reduce the bulk and massing of the ERF thereby reducing the visual impact.	N
	b) heat being used efficiently including during the summer months when there is less demand for heat;						The proposed ERF is expected to be one of the most efficient facilities in the UK. The proposed ERF will be designed to have an R1 energy efficiency of approximately 0.8 and will therefore be classed as a recovery operation under the Waste Framework Directive. The efficiency will be dependent on the level and nature of the heat demand (outside the control of the Applicant). The type and design of turbine to be installed in the proposed ERF would be supplied in an efficient and cost effective manner to be decided upon during detailed design.	N
	c) waste being stored on site so it can be used efficiently when required;						The Project includes a bunker with sufficient capacity to ensure a continuous supply of fuel.	N
	d) not impact on waste reduction and recycling targets;						Please refer to response 6.7.21 regarding the impact on waste reduction and recycling targets.	N
	e) demonstrate that the waste is truly residual;						The ERF will treat residual waste collected by the NLWA Constituent Boroughs. Should the facility at any point have spare capacity (for example where lower than forecast residual	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							waste arisings occur and/or higher recycling rates are achieved) then residual waste from other sources within and outside NLWA area can be treated without acting as a barrier to NLWA and its Constituent Boroughs maximising recycling rates.	
	f) be consistent with adopted planning policy						The Project is generally in conformance with planning policy, further detail is set out in the Planning Statement (AD05.02). It should be noted that the governing policy framework for this type of NSIP is NPS EN-1 and EN-3.	N
Objections to the proposed facility								
6.7.18	Object to the proposals because: the project is unnecessary; challenge the scope and scale of the draft DCO.	-	-	-	3	59; 90; 89;	NPS EN-1 and EN-3 demonstrate an urgent need for energy infrastructure of this type (refer to the Need Assessment for details). In respect of waste management the Need Assessment sets out the need for the Project in terms of meeting policy, and how the scope and scale of the Project meets the requirements for the Applicant to treat/dispose of residual waste collected by the Constituent Boroughs based on the forecasting of future residual waste arisings.	N
6.7.19	The proposed location is unsuitable because: a) it is too close to residents	-	-	-	4	59; 85; 10076; 10120	The ERF would be located at the EcoPark which is an existing waste site. The EcoPark is safeguarded for future waste use in the London Plan. The nearest residential properties are 600m to the east and west of the operational site. The likely significant effects at sensitive receptors, such as residential areas, are considered in the ES.	N

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Need for a replacement facility								
	b) is not large enough						The Book of Plans (AD02.01) and the Design and Access Statement demonstrate that the Edmonton EcoPark is large enough to accommodate the proposed facility.	N
	c) places all of the burden on Enfield residents						The assessment of alternatives conducted as part of the North London Waste Plan development did not identify any other suitable sites within NLWA area.	N
6.7.20	Concern about financial implications to the tax payer resulting from inaccurate waste forecasting model and not updated North London Waste Plan; the money could be used for other essential services	-	-	-	2	86; 10052	<p>The waste forecasting is based on estimates of residual waste which will be collected by the Constituent Boroughs over the years to 2051, and includes a range of recycling rate scenarios (40%, 50% and 60%) which represent a reasonable range of estimated future household recycling performance for NLWA area. The methodology for waste forecasting is clearly set out in the Need Assessment (AD05.04).</p> <p>To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by the Constituent Boroughs in the future would not be in the interests of tax payers due to the risk that this waste would have to be treated or diverted to landfill outside the area not meeting the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.</p> <p>No waste forecasting approach is without a level of uncertainty but for the Project 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</p>	N

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Need for a replacement facility								
							<p>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 within the range identified in the London Plan and within that is at the lower end of overall household waste arisings compared to the main London Plan projection.</p> <p>The draft North London Waste Plan, recently issued for consultation takes into account the forecasting carried out for this Project.</p> <p>The Project is being brought forward to deliver NLWA statutory responsibilities as a Waste Disposal Authority. The funding for this Project is as such not provided at the expense of other essential services.</p>	
6.7.21	The facility poses environmental and health hazards and impacts adversely on residents' quality of life.	-	-	-	2	90; 10120	The impact of the Project on the environment is considered in the ES and the Health Impact Assessment considers the potential health impacts. Refer to the Environment Table for further information 6.4.	N
6.7.22	The facility would require large volumes of waste which would have negative impact on improving recycling/prevention targets	-	-	-	6	77; 86; 88; 89; 10052; 10056	The Applicant is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. NLWA has active programmes to encourage waste prevention, re-use and recycling. Further details of this proactive approach to waste prevention and increasing the levels of recycling and composting can be found in the Need Assessment. In addition, NLWA's 'Wise up to Waste' campaign has	N

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Need for a replacement facility								
							further information (See: http://www.wiseuptowaste.org.uk/). The ERF will treat residual waste collected by NLWA Constituent Boroughs. Should the facility at any point have spare capacity (for example where lower than forecast residual waste arisings occur and/or higher recycling rates are achieved) then residual waste from other sources within and outside NLWA area can be treated without acting as a barrier to NLWA and its Constituent Boroughs maximising recycling rates.	
6.7.23	<p>Insufficient assessment, lack of strategy: no cost/benefit/risk analysis of alternate capacity sizes, stepped approach to building capacity or looking into various waste scenarios, e.g.:</p> <ul style="list-style-type: none"> a) waste in manufacturing changes; b) collaborative economy grows; c) focus on circular economy increases; d) technological, legal or regulatory changes occur. <p>Other alternatives, including a possible exit route if the proposed development is</p>	-	-	-	4	59; 88; 89; 10052	<p>A summary of the assessment of alternative treatment options can be found in the Alternative Assessment Report (AD05.03). The assessment of the cost of delivery of the Project confirmed that a single ERF producing energy was more cost effective than other potential treatment options.</p> <p>The factors affecting household MSW generation are numerous and complex largely driven by social factors which do not necessarily display a mathematical correlation.</p> <p>The waste forecasting carried out for this Project 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.</p> <p>A comparison with a number of alternative approaches to modelling future waste arisings in London shows that the Applicant's waste model is consistent with the alternatives (for</p>	N

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Need for a replacement facility								
	deemed inappropriate, have not been explored						<p>example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan).</p> <p>In comparison to the modelled scenarios developed as part of the updated London Plan the Applicant's model generates an estimate of overall household waste arisings which is at the lower end of the range in the London Plan which uses population growth as the basis.</p> <p>No approach to the forecasting of future waste arisings is immune to the inherent uncertainty involved in estimating waste arisings more than a few years into the future; to predict how the various factors identified in this consultation comment (e.g. the impact of a growth in the collaborative economy or future changes in technology, legal or regulatory change etc.) would impact on future waste arisings would be highly speculative and difficult to justify in any meaningful way.</p> <p>The approach taken to waste forecasting for the Project, based as it is on statistical analysis of historical waste arisings and the future impact of a range of recycling rate scenarios, is considered to be a reasonable basis on which to assess residual waste treatment capacity requirements.</p> <p>See response 6.7.23 update regarding the consideration of other alternative treatment options.</p> <p>If a DCO for the Project were not granted the Applicant would have to go to the market at</p>	

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							least initially in the short term and review its options at that time.	
6.7.24	The proposed development does not comply with other strategies/policies such as:	-	-	-	1	59	The Project complies with National Planning Policy for Waste, further information is provided in the Planning Statement. Section 4 requires waste planning authorities to allocate suitable waste sites and as such is not applicable to development applications. Nevertheless the Edmonton EcoPark is identified as a waste site in local policy.	N
	a) National Planning Policy for Waste 2014 (with specific reference to S.4);							
	b) R1 status promoted by the European Commission;						The proposed ERF will be designed to have an R1 energy efficiency of approximately 0.8 and will therefore be classed as a recovery operation under the Waste Framework Directive.	N
	c) Section 110 of Localism Act 2011;						Section 110 of the Localism Act refers to the Duty to Cooperate and is not applicable to persons seeking consent for individual developments.	N
	d) CHP element of sections 93-97 of National Planning Policy Framework 2012.						Sections 93-97 of the NPPF relate to meeting the challenge of climate change. The Project is in general conformity with these sections since it helps increase the use of renewable and low carbon energy – for further details please see Section 2.2. Climate Change in the Need Assessment.	N
6.7.25	a) Concerns that the proposed facility is too big and its size is based on inaccurate waste forecasting model (over relying on GDHI metric; assuming higher	EA	-	-	3	86; 89; 10052	Please refer to response 1.2.6. In addition: The use of the GDHI metric is based on detailed statistical regression analysis of the correlations between historic waste arisings and a range of socio-economic variables. The approach is	N

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Need for a replacement facility								
	Apportionment target and C&I share) and data that does not take into account future waste reducing technologies, new regulations or changes in the demand for non-renewable energy.						described in detail in Appendix A of the Need Assessment. The London Plan commits the Mayor to a policy whereby London's net self-sufficiency in treating its own waste within London is improved through reducing the proportion of waste exported from the capital over time (and down to zero exports by 2026). The Project will make a significant contribution to achieving this aim, including by meeting the net self-sufficiency target for the Constituent Boroughs. The modelling assumptions regarding the forecast growth in residual C&I waste market share has been agreed with each Constituent borough as representing a reasonable assumption in light of each borough's plans in this area.	
	b) Concern that planning for overcapacity would lead to import of waste which in turn would result in long journeys to and from the facility.						The Applicant is not 'planning for overcapacity'; in addition to the waste modelling work, the proposed sizing is informed by a number of important influencing factors including the financial risk to the Applicant of having under-capacity, as well as operational design considerations relating to the seasonality of waste arisings, bunker management and thermal capacity. These factors result in variations in waste arisings throughout the year and as such the facility will be required to manage these fluctuations.	N
	c) There is a suggestion that the Joint North London Waste Strategy should have been updated and used to						The North London Joint Waste Strategy covers the period from 2004 to 2020 and as such is still current.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
	inform the waste forecasting targets.							
	d) Similarly, another request is the waste forecasting model to be rerun using the most up-to-date data as published in FALP March 2015.						The Need Assessment contains a comparison with an alternative approach to modelling future waste arisings as forecast within the London Plan. This shows that the forecast produced for the Project is within the range identified in the London Plan and within that is at the lower end of overall household waste arisings compared to the main London Plan projection.	N
6.7.26	Criticism that this is just a plain incinerator, not a combined heat and power facility.	-	-	-	1	59	There is not currently an existing district heating network which the Project could connect to as such the proposed ERF will be CHP enabled and routes for a heat network pipe have been safeguarded within the Application to enable a future connection.	N
Alternatives								
6.7.27	There should be a stronger focus on more environmentally friendly waste management systems (recycling, prevention, reuse) and energy generating methods (solar energy).	EA	-	-	8	62; 66; 77; 79; 83; 86; 88; 10052	NLWA is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. The NLWA has active programmes to encourage waste prevention, re-use and recycling. Further details of this proactive approach to waste prevention and increasing the levels of recycling and composting can be found in the Need Assessment. In addition, NLWA's 'Wise up to Waste' campaign has further information See: http://www.wiseuptowaste.org.uk/ . A summary of the assessment of alternative treatment options can be found in the Alternative Assessment Report which confirms	N

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Need for a replacement facility								
							that a single ERF producing energy was more cost effective than other potential treatment options.	
6.7.28	Other waste management methods that should be considered include: a) MBT plant in combination with anaerobic digestion and land filling the inter residue; b) gasification plant; c) methane recovery	-	-	-	3	88; 92; 79	A summary of the assessment of alternative treatment options can be found in the Alternative Assessment Report which confirms that a single ERF producing energy was more cost effective than other potential treatment options.	N
6.7.29	Suggest the CHP facility is designed differently to enable a higher energy output, working in close co-operation with two MBT plans	-	-	-	1	59	Refer to response 6.7.28.	N
Lee Valley Heat Network								
6.7.30	Comments on Lee Valley Heat Network include: a) overall support with requests for the produced heat to be used locally, including at Meridian Water b) concern that there might be low demand during summer months; c) criticism that the proposed heating	GLA	LBE	-	5	59; 83; 92; 10045; 10046;	The Lee Valley Heat Network (LVHN) is being brought forward by LBE. In parallel with the preparation of this Application, 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: www.leevalleyheatnetwork.co.uk	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
	network is not extensive enough							
6.7.31	NLWA should continue working with GLA to enable the delivery of the heat network; heat networks require substantial levels of investment and having a 40 year plus life, the new ERF will give the heat network investors' confidence that heat will continue to be available	GLA	-	-	0	-	NLWA will continue to engage with the GLA in respect of the provision of heat from the Project via Lee Valley Heat Network or other appropriate district heating network.	N
Resource Recovery Facility								
6.7.32	Comments on the RRF include:	-	-	-	5	10105; 66; 85; 10101; 10042	Support for the RRF is noted and welcomed.	N
	a) support as it will be beneficial to local residents and businesses, can help keep Enfield clean;							
	b) request for the Reuse and Recycling Centre to be offered free of charge;						The RRC will be provided free of charge for residents.	N
	c) criticism that there is limited information on the RRF and appears overlooked;						Information on the RRF is set out in the Book of Plans and Design and Access Statement. The facility has been fully assessed in the ES and other application documents as relevant.	N
	d) question why it should be in Edmonton.						The RRF is needed for the operation of the ERF and as such needs to be located in close proximity to that facility. If the RRF were located	N

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Need for a replacement facility								
							off-site there would be an additional cost and impact of transporting residual waste from the RRF to the ERF.	
Timeline								
6.7.33	Comments on the timeline include:	-	-	-	3	10045; 10098; 82	Support for the Project coming forward now is welcomed;	N
	a) proposal is timely;							
	b) should have been done sooner;						The Project is being brought forward now in order to ensure that the proposed ERF is in place prior to the existing EfW facility coming to the end of its life;	N
	c) concern that 10 year wait is too long and technology used in the project might become obsolete						The ERF will be built using today's best available technology. It will be one of the most effective of its kind by current standards. Applicant will revisit the preferred technology solution for the ERF however the procurement and construction lead in times for delivery of the Project mean that this will need to be carried out in the short term and so it is not anticipated that there will be a significant change in the proven technologies available in that period.	N
Suggested criteria								
6.7.34	The proposed facility should be efficient. Efficiencies can be achieved through: a) optimising the heat off-take capacity of the plant in terms of the economic production of heat, and be in line with good steam turbine/district heating	GLA	-	-	0	-	The proposed ERF is expected to be one of the most efficient facilities in the UK. The energy output, both heat and electricity, will be optimised. At this stage the projected heat demand is not fixed.	N

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Need for a replacement facility								
	practice. The offtake capacity should not be designed to meet just the demands currently being negotiated with the LVHN as the LVHN capacity will be far less than the plant potential;							
	b) having the ability to adapt its export levels to demand as the Grid requires flexibility;						The ERF would allow for this.	N
	c) allowing for the adoption of new technologies that may become available;						The ERF would be built using today's best available technology. It would be one of the most effective of its kind by current standards.	N
	d) having a sufficient power storage;						Power storage does not form part of the Project. Power produced by the Project will be exported straight to the National Grid. It is not efficient to store heat, as such, should a connection to District Heating network be made heat would be exported straight away.	N
	e) gaining extra revenue from participating in capacity market auction and Demand Side Response.						The potential for the Project to participate in capacity market auction and Demand Side Response is limited because of the need to treat waste in a timely manner.	N
6.7.35	The proposed facility should be environmentally friendly: it should meet the carbon intensity floor of 400 grams	GLA	-	-	1	79	The Project would achieve the carbon intensity floor of 400 grams of CO ₂ eq per kWh of electricity generated subject to it being connected to a heat network. Further information is set out in the Need Assessment	N

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Need for a replacement facility								
	of CO ₂ eq per kWh of electricity generated;						and WRATE report appended to the Sustainability Statement (AD05.13).	
	it should be an example of best eco practice.						The Project would use today's best available technology. The sustainability credentials of the project are set out in the Sustainability Statement.	N
Further studies are required								
6.7.36	Further studies to decide what the optimum capacity is. These should include: a) confirm the regression work by considering Gross Disposable Household Income (GDHI) levels with waste in similar to UK economies;	-	-	-	3	59; 10052 10055;	It is not appropriate to consider GDHI levels with waste in economies similar to the UK for a number of reasons. GDHI data comparable with that produced by the Office for National Statistics for the UK is not readily available for other countries. The correlation equation derived from the regression analysis carried out for the Project is unique to the data used. It would not be expected that the same statistical relationship would exist for other countries, even if the data was available.	N
	b) conducting situational analysis to identify future trends that might affect waste volumes;						With regard to situational analysis of future trends refer to response 1.2.6 and 1.2.8.	N
	c) mapping the sources of waste and thinking how these can be influenced						With regard to how sources of waste can be influenced please refer to response 1.3.1.	N
	d) Professional evaluation should be conducted with regards to the logistics of waste derived fuel production.						With regards to waste derived fuel production, assuming that the issue refers to the production of Refuse Derived Fuel for further treatment in an alternative facility, please refer to response 1.3.2 on alternatives assessment.	N

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Need for a replacement facility								
Requests for more information								
6.7.37	Waste forecasting:	-	-	-	5	66; 88; 10052; 10066; 10120	The Applicant has a legal obligation to treat residual waste collected by its Constituent Boroughs. Projections of the amount of waste collected by these boroughs is detailed in the Need Assessment. The Applicant is not responsible for treating residual waste from other boroughs and therefore projections of the amount of this residual waste is not included within the waste forecasting undertaken for the Project.	N
	a) how much waste would be collected from other boroughs;							
	b) where would the consolidation depots be located and how much waste would be brought from them to the site;						Borough waste collection logistics are described in Section 2 of the Fuel Management Assessment (AD05.05).	N
	c) more information on future supply of waste and what amounts would be recycled; are there quotas for amount of waste to be incinerated;						The Need Assessment sets out the forecast waste arisings, together with the assumptions made regarding future recycling rates. There are no 'quotas for the amount of waste to be incinerated'.	N
	d) provide data that demonstrates that more waste would be treated closer to source;						Approximately 105,000 tonnes of waste collected by the Constituent Boroughs was sent to landfill outside NLWA area in 2012/13 ¹⁹ . Under the Project the majority of residual waste would be treated within the ERF representing a considerable addition to the proportion of waste being treated closer to source.	N

¹⁹ Draft NLWP Data Study Part 2

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Need for a replacement facility								
	e) provide a fuller carbon report with a wider range of scenarios;						The WRATE Assessment appended to the Sustainability Report assesses four scenarios (all waste to landfill; continuing current operations; new ERF with CHP and sending half the waste abroad and half to landfill). These are considered to provide a reasonable range of realistic scenarios to manage waste at this volume. The Alternatives Assessment Report sets out the route of decision making for the choice of technology and other options assessed were used as comparators to the proposed ERF.	N
	f) the consultation documents state 'should there be spare capacity; - is this a reflection of amended waste forecasts between Phase 1 and Phase 2;						The waste forecasts have not been amended between Phase One and Phase Two Consultation. The statement reflects that these are forecasts.	N
	g) provide information that demonstrates that ERF is of optimum size.						The size of the ERF is based on the forecast waste arisings and NLWA's obligation to put in place arrangements to deal with residual waste collected in its area without being able to be certain about how much there would be. Further information is set out in the Need Assessment.	N
6.7.38	Recycling: a) how will NLWA achieve its 50% recycling target; why not aim for a 60% recycling target, b) what measures will be put in place to ensure	GLA	-	-	2	66; 10052	NLWA has active programmes to encourage waste prevention, re-use and recycling. NLWA's "Wise up to Waste" campaign has more details of this activity (See: http://www.wiseuptowaste.org.uk/). Currently approximately 30 per cent of North London's waste is recycled and 50 per cent has therefore been set as an ambitious but achievable target	N

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Need for a replacement facility								
	that the project would not impact on recycling targets and waste treated in the facility is truly residual						<p>given the socio-demographic and housing stock profile of the Constituent Boroughs and current trajectory of recycling rates. Further discussion of what constitutes a reasonable expectation of recycling rate levels for NLWA area can be found in the Need Assessment.</p> <p>NLWA is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. The Authority has active programmes to encourage waste prevention, re-use and recycling. Further details of this proactive approach to waste prevention and increasing the levels of recycling and composting can be found in the Need Assessment.</p>	
6.7.39	Request for a list of failed waste incineration projects and the costs of those that have gone ahead to be provided	-	-	-	1	89	<p>The Applicant is not aware of any failed incineration projects.</p> <p>It is not appropriate for this application to provide costs of other projects.</p>	N
6.7.40	Why have plans for using a SRF plant been abandoned, despite statements made at the time that this was the most suitable technology to manage North London's residual waste?	-	-	-	1	10052	<p>The decision to not progress a SRF plant was taken on the basis of two key assessments. The first related to the planning policy framework affecting the Edmonton EcoPark which had altered with the cumulative effect of the SPD for the EcoPark site by LB Enfield and the Upper Lee Valley Opportunity Area Planning Framework by the Mayor of London. These policies represented a shift in attitudes towards future energy recovery on site to replace the existing EfW, such that energy recovery at the Edmonton EcoPark was supported. The second</p>	N

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Need for a replacement facility								
							assessment was an updated assessment of the cost of delivery of an energy recovery facility at the Edmonton EcoPark taking into account the improvement in deliverability of that solution through the changed planning policies. This second assessment confirmed the Outline Business Case analysis that a single treatment facility producing energy was more cost effective than other potential treatment options. Further information is set out in the Alternatives Assessment.	
6.7.41	Electricity / heating networks: a) provide more information on the heating scheme;	GLA	-	-	2	66; 92	The Lee Valley Heat Network (LVHN) is being brought forward by LBE and does not form part of this application. 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: www.leevalleyheatnetwork.co.uk	N
	b) provide information on the electricity and heat capacity when describing the plant's energy output						At this stage the projected heat demand is not fixed. Energy output is therefore quoted in MW for consistency and because this is the unit used in NPS EN-1.	N
6.7.42	Alternatives: a) what alternatives have you considered and why were these rejected;	-	-	-	3	74; 86; 10052	The alternatives considered are set out in the Alternatives Assessment (AD05.03).	N
	b) request for more visionary alternatives designed by an independent party;						Based on our assessment, we considered that an ERF is the most suitable technology to manage North London's residual waste. As is standard, the Applicant is responsible for procuring a design for the Project, and in this	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
							case has commissioned Grimshaw Architects to design the new facilities.	
	c) wouldn't a smaller plant suffice to deal with the estimated levels of waste;						The proposed ERF has been sized to treat the forecast waste arisings, as documented in Need Assessment.	N
	d) what cost of risk has NLWA attributed to undercapacity and what probability of occurrence has been assumed; how does this analysis compare with the cost of the chosen facility.						To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by 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 area not meeting the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.	N
6.7.43	How have the proposals been formally assessed by the partner authorities, given that the 14 councillors who make up NLWA do not represent the seven councils when addressing NLWA's issues	-	-	-	1	10052	The seven north London boroughs have been consulted on the proposals as part of the formal Phase One and Phase Two Consultations. The 14 councillors who make up NLWA do represent the seven Constituent Boroughs. Specific planning officer and member briefings to engage the wider constituencies within those councils have been held with the seven Constituent Boroughs. Decision on management of residual waste are a matter for the statutory waste disposal authority.	N

Account Taken of Phase Two need comments

- 6.7.44 Many respondents supported the need for the Project noting that the existing EfW facility is coming to the end its operational life, the Project is cheaper than sending waste to landfill, is in-line with existing policies and plans such as the LVHN, would provide low carbon energy and promotes net self-sufficiency.

- 6.7.45 Several comments supported the Project subject to it not impacting on achieving waste reduction and recycling targets, whilst others considered that the Project would impact these. The NLWA is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. The NLWA has active programmes to encourage waste prevention, re-use and recycling. Further details can be found in the Need Assessment (AD05.04) and in the NLWA's Wise up to Waste campaign website (<http://www.wiseuptowaste.org.uk/>).
- 6.7.46 Other comments related to the location of the Project at the Edmonton EcoPark, with some respondents noting that the site is too close to residents and places all of the burden on Enfield residents. The Edmonton EcoPark is an existing waste site and safeguarded for waste use in the London Plan. The assessment of alternatives undertaken for the North London Waste Plan did not identify any suitable alternative sites.
- 6.7.47 Several comments questioned the accuracy of the waste forecasting. The Applicant's approach to waste forecasting for the Project, based as it is on statistical analysis of historical waste arisings and the future impact of recycling rate scenarios, is considered to be a reasonable basis on which to assess residual waste treatment capacity requirements. A comparison with a number of alternative approaches to modelling future waste arisings in London shows that the Applicant's waste model is consistent with the alternatives.
- 6.7.48 Other respondents felt that the Applicant is planning for overcapacity. The Applicant is not planning for overcapacity, the size of the proposed ERF has been informed by the waste forecasting and other factors such as the financial risk to the Applicant of having under-capacity, as well as operational design considerations relating to the seasonality of waste arisings, bunker management and thermal capacity.
- 6.7.49 Some respondents noted that the Project should be flexible to adapt to new technologies which may become available. The Project would be built using today's best available technology and would be one of the most effective of its kind by current standards. Applicant will revisit the preferred technology solution for the ERF however the procurement and construction lead in times for delivery of the Project mean that this will need to be carried out in the short term and so it is not anticipated that there will be a significant change in the proven technologies available in that period.
- 6.7.50 Several comments suggested further assessments which should be undertaken, including situational analysis to identify future trends that might affect waste volumes and mapping the sources of waste. All relevant and appropriate assessments have already been undertaken and are set out in the Need Assessment.

6.8 Construction and demolition

6.8.1 The comments raised in respect of construction and demolition issues during Phase Two Consultation are summarised in Table 6.7, together with the Applicant's response.

Table 6.7: Comments on construction and demolition received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
Concern								
6.8.2	Concern that the construction stage would have adverse impact on the local traffic and transport.	TfL	-	-	0	-	A full assessment of the potential effect on traffic during construction has been undertaken and is set out in the Transport Assessment (AD05.11). Section 11 of the Code of Construction Practice (AD05.12) sets out measures to manage traffic during construction.	N
Mitigation measures								
6.8.3	Suggested mitigation measures include:	TfL	LBE	-	0	-	Section 11 of the Code of Construction Practice sets out measures to reduce the impact on traffic, including a requirement that a Traffic Management Plan is produced prior to construction.	N
	a) measures to minimise the impact on traffic; for example the introduction of Construction Logistics Plan;						Section 5 of the Code of Construction Practice sets out measures to manage potential air pollution during construction.	N
	b) measures to prevent the release of air pollutants;						The Code of Construction Practice sets out measures to manage the potential impacts of construction including on the surrounding areas.	N
	c) measures to minimise the impact on surrounding areas: Eley and Aztec 406 Industrial Estates and Salmon's Brook; these measures should comply							

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
	with the Edmonton EcoPark Planning Brief SPD, Enfield's Local Plan and CLAAP.							
Comments on the Interim Code of Construction Practice (CoCP)								
6.8.4	The CoCP is comprehensive and should be strictly applied.	-	LBE	-	3	10080; 10046; 10047	Noted. The Draft DCO requires the Project to be undertaken in accordance with the Code of Construction Practice.	N
6.8.5	Responses supported the following elements of the Project: a) introduction of Traffic Management Plan; b) proposed measures to reduce construction traffic impacts; c) proposed approach to work related road risks.	TfL	-	-	0	-	Supported for the measures proposed is noted and welcomed.	N
6.8.6	The following measures were suggested to improve the CoCP: a) appoint a contractor to oversee the implementation of the Traffic Management Plan;	TfL	-	-	0	-	It is standard practice for the contractor to oversee the implementation of the Traffic Management Plan and this will be implicit in the contract.	N
	b) develop further the construction traffic management measures;						Construction traffic management measures will be further detailed in the Traffic Management Plan.	N
	c) consider if restricting operations to core hours would not have undesired						The Transport Assessment has assessed the impacts of the proposed construction assuming that work is	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
	traffic implications such as increasing traffic intensity at peak hours;						undertaken during restricted hours – the assessment concluded that there would be no significant impact.	
	d) set up a booking system and agree where holding areas would be acceptable as stopping is not allowed on the TfL Road Network unless permission is obtained;						Adequate space to hold vehicles is provided within the Application Site, additional holding areas and a booking system are therefore not required.	N
	e) find the right balance between meeting transport demands and promoting sustainable travel among workers.						A Construction Travel Plan is appended to the Transport Assessment this sets out measures to promote sustainable transport whilst recognising the location of the Application Site and nature of construction works.	N
6.8.7	Request that the CoCP provides details on the measures required to protect and enhance the SMINC.	-	-	LVRPA	0	-	<p>Less than 0.5 per cent of the total area of the Site of Metropolitan Importance of Nature Conservation (SMINC) falls within the Application Site. A small area (0.11ha) of the SMINC would be will be permanently lost to hardstanding as it is located under the proposed ERF ramp, new entrance or new path alongside Lee Park Way. The Vol 2 Section 2 of the ES assessed the impact of the Project on the SMINC and concludes that the proposals are offset by the proposed enhancements of habitats along Lee Park Way and along Enfield Ditch.</p> <p>The Code of Construction Practice includes a range of measures which apply to all areas, and therefore include the SMINC located outside the</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
							Application Site, for example measures to protect ground water and limit noise.	
Comments on Community Liaison Group								
6.8.8	Introducing a Community Liaison Group is a good idea.	-	-	-	1	10046	Support for the Community Liaison Group is noted and welcomed.	N
Comments on the proposed Temporary Laydown Area								
6.8.9	General support for the Temporary Laydown Area.	-	-	-	13	10114; 10111; 10112; 10113; 10077; 10087; 10093; 10075; 10045; 10047; 60; 87; 80	Support for the Temporary Laydown Area is noted and welcomed.	N
6.8.10	Specific reasons for support include: a) would enhance operations; b) site is suitable as it is currently unused; c) would help local residents who need to access the area on a regular basis; d) would ease congestion.	-	WCC	-	4	5; 68; 10080; 10079		N
6.8.11	Support if properly mitigated.	-	WCC	-	0	-	The ES assesses the potential effects of the whole Project i.e. including the Temporary Laydown Area, and proposes mitigation measures as needed and these are set out in the Environmental Commitments and Mitigation Schedule (AD06.03).	N
6.8.12	Support if it is temporary and the area is returned to its	-	-	-	2	10078; 10046	The Temporary Laydown Area is a temporary feature and the Applicant will	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
	previous state at the end of the project.						have no use for it once construction is complete. The Draft DCO requires the suitable reinstatement of the Temporary Laydown Area.	
6.8.13	Concern that it would become a permanent feature.	-	-	-	1	10120		N
6.8.14	Concern that the temporary laydown area sits outside the <i>"envelope of the existing site"</i> and would disrupt park users and local businesses; query if other options were considered.	-	-	LVRPA	1	99	<p>A Temporary Laydown Area outside of the Edmonton EcoPark is needed as the existing Edmonton EcoPark does not have sufficient space to support the construction activities of the scale required.</p> <p>There is currently no public access to the proposed Temporary Laydown Area and as such park users will not be disrupted. There will be some minor footpath diversions along Lee Park Way, which retain access routes throughout.</p> <p>A number of key considerations were taken into account when selecting an appropriate Temporary Laydown Area. These included, ease of access, distance from the Edmonton EcoPark, layout and size, utilities, site security etc. Other off-site locations were considered including the land within Deephams Sewage Treatments Works, Eley Industrial Estate and the car park at IKEA. These locations were not considered suitable as they did not satisfy the key considerations needed to ensure the proposed Temporary Laydown Area would be feasible for the purposes of the Project.</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
6.8.15	Suggested mitigation measures include:	TWUL	LBE	LVRPA	2	79; 88	The Vol 2 Section 2 of the ES has concluded that since the small area of habitat lost as a consequence of the Project has no ecological value no offsetting is required. Nevertheless habitat enhancements are proposed along Lee Park Way.	N
	a) provide a replacement habitat;							
	b) prevent water and air pollution;						Measures to prevent air and water pollution are set out in Sections 5 and 12 of the Code of Construction Practice and include measure such as screening buildings to be demolished, and suitable storage of potentially polluting materials.	N
	c) ensure that any reinstatement scheme takes into account that this area is earmarked for flood storage/recreational space for the Meridian Water development;						It is acknowledged that the proposed Temporary Laydown Area is proposed for formal recreation and flood alleviation as part of the Meridian Water masterplan. The Draft DCO requires the restoration of the Temporary Laydown Area to its prior condition.	N
	d) secure Thames Water's consent before start using the site.						Discussions with Thames Water are underway with a view to securing consent to use this land. In the absence of such agreement appropriate are being sought through the DCO.	N
Comments on Management								
6.8.16	Request to recycle the materials from the current site	-	-	-	1	79	The Code of Construction Practice requires that all waste generated during construction will be managed, so far as reasonably practicable, in accordance with the waste hierarchy. The contractor will be required to prepare a Site Waste	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
							Management Plan in accordance with the Waste and Resources Action Programme (WRAP) guidance.	
6.8.17	Request to take into account nearby developments and existing infrastructure including:	NG; TWUL; GLA	LBE	-	0	-	Potential impacts of the Project on the Eley and Aztec Industrial estates have been considered in the ES which concludes there are no significant impacts.	N
	a) Eley and Aztec 406 Industrial Estates;						Existing utilities within the Application Site and possible interference have been identified in the Utilities Strategy (AD05.10) and the DCO include protective provisions. The approach to piling would be consulted on with the EA in accordance with the Code of Construction Practice.	N
	b) Thames Water's sewerage infrastructure: this may be impacted by impact piling so piling method statement should be submitted to and approved by the local planning authority;							
	c) TfL operational land interests on the site;							
	d) National Grid's infrastructure including towers, low or medium pressure gas pipes and above ground gas pipes.							
6.8.18	Request to ensure the site is secured from vandals	-	-	-	1	10086	Fencing during construction is required in accordance with the Code of Construction Practice. Permanent fencing is part of the authorised development within the DCO.	N
6.8.19	Request to keep construction pollution, noise, traffic and general disruption to a	-	-	-	8	10116; 10119; 10083; 10084; 10103; 10080; 10082; 85	The Code of Construction Practice includes a range of best practicable measures to reduce pollution, noise,	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
	minimum; concern about toxic substances such as asbestos.						traffic and general disruption during construction. The Code of Construction Practice requires the Contractor to carry out site assessments, investigations and/or risk assessments to assess the potential for contamination. Where the presence of contamination is revealed an appropriate remedial strategy, approved by LB Enfield, is required.	
6.8.20	Request to keep residents informed	-	WCC	-	3	5; 10092; 10091	Maintaining community relations is a key element of the Project. The primary mechanism for engagement is the Community Liaison Group, further details of which are set out in the Code of Construction Practice.	N
6.8.21	Request to clean roads regularly	-	-	-	2	10077; 10079	Section 11 of the Code of Construction Practice requires all reasonable measures to be put in place to avoid and mitigate the deposition of mud and other debris on the highway, for example through vehicle wash down points at each exit point on the highway.	N
Comments on Timeline								
6.8.22	Query if this is the minimum time period in which construction can be completed.	-	-	-	1	78	The proposed construction programme is realistic for a project of this nature and scale, and ensures adequate time to assess and mitigate for any potential effects.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Construction and demolition								
Further assessment is required								
6.8.23	These include: a) produce Construction and Decommissioning Environmental Management Plans;	NG; PHE	-	-	0		Section 2.3 of the Code of Construction Practice requires the Contractor to produce a Construction Environmental Management Plan, this document will also cover decommissioning of the existing EfW.	N
	b) include Protective Provisions aimed at safeguarding National Grid's apparatus in the DCO						Protective provisions are included in the Draft DCO.	N
Requests for more information								
6.8.24	Request for information on: a) what will happen to the existing site once the current plant is demolished;	-	-	-	5	10047; 66; 10081; 10082; 10116	No development is proposed for the existing EfW plot as part of this DCO Application. This area will be available for future waste use, subject to securing the appropriate permissions, in accordance with the Edmonton EcoPark's designation as a waste site.	N
	b) what is the purpose of a laydown area						The Temporary Laydown Area is necessary to construct the Project. It will be used for parking for construction workers; temporary accommodation, storage/laydown and fabrication of materials and temporary attenuation storage.	N

Account taken of Phase Two construction and demolition comments

- 6.8.25 Respondents suggested that the Project should incorporate measures to minimise impact on traffic, prevent air pollution, ensure the site is secure, recycle materials from the existing site and keep roads clean. Measures in respect of all of these elements are set out in the CoCP (AD05.12).
- 6.8.26 Several comments noted that the CoCP is comprehensive and agreed that it should be applied during construction. There was particular support for the proposed approach to managing traffic during construction. The proposed Community Liaison Group was also supported and there was a request to keep residents informed.
- 6.8.27 Several respondents understood the need for the Temporary Laydown Area, and were supportive so long as it is temporary and is suitably reinstated afterwards. Some respondents queried the alternatives considered for the Temporary Laydown Area and questioned why it had to be in this location. The Temporary Laydown Area is needed because the existing Edmonton EcoPark does not have sufficient space to support the construction activities of the scale required. The considerations in selecting an appropriate laydown area include ease of access, distance from the Edmonton EcoPark, layout and size, utilities, and site security. No other site was identified which satisfied these considerations.
- 6.8.28 Several comments highlighted the need to take into account neighbouring properties and existing utilities. Appropriate provisions have been incorporated into the DCO to protect existing utilities within and close to the Application Site. The potential impact of the Project on neighbouring areas has been assessed in the ES (AD06.02) which concludes there would be no significant impact.

6.9 Traffic and Transport

6.9.1 The comments raised in respect of traffic and transport issues during Phase Two Consultation are summarised in Table 6.8, together with the Applicant's response.

Table 6.8: Comments on traffic and transport received in Phase Two Consultation

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
Access points								
6.9.2	The proposed additional access points to the Edmonton EcoPark are welcomed.	-	-	-	26	79; 80; 87; 10045; 10047; 10056; 10083; 10084; 10085; 10091; 10092; 10093; 10096; 10097; 10098; 10099; 10100; 10104; 10106; 10107; 10108; 10109; 10110; 10115; 10116; 10118	Support for the proposed access points is noted and welcomed.	N
6.9.3	Support for the proposals as the additional access points would reduce congestion.	-	-	-	14	66; 68; 10046; 10081; 10082; 10087; 10088; 10089; 10094; 10095; 10101; 10105; 10114; 10117		N
6.9.4	Support for the proposals as the additional access points would make the facility accessible and link it to the wider surroundings.	-	WCC	-	7	10112; 10113; 10119; 10102; 10103; 10111; 10090		N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
6.9.5	Other reasons for supporting the proposed access points include: a) would make the RRC accessible to the public; b) would save travel time for lorry drivers which makes them more cost-effective; c) would provide the opportunity to form a public-facing frontage along the river edge via Advent Way.	GLA	-	-	2	10078; 5		
6.9.6	Support if disruption is kept to a minimum	-	-	-	2	10080; 78	The Code of Construction Practice and Construction Travel Plans include measures to reduce the effect of construction on the local transport network. During operation the Operational Travel Plan will include equivalent measures. Both Travel Plans are appended to the Transport Assessment (AD05.11).	N
6.9.7	Support the transport aspects of the project if mitigated properly: a) ensure that each access can work safely taking account of non-motorised modes;	TfL	-	-	0	-	Access for pedestrians and cyclist is provided would not be adversely affected.	N
	b) need Road Safety Audits;						Stage 1 Road Safety Audits are included in Appendix D of the Transport Assessment.	N
	c) comply with appropriate design standards.						Project complies with the following design standards:	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							<ul style="list-style-type: none"> Design Manual for Roads and Bridges (HA, 2015); London Cycle Design Standards; Manual (TfL, 2014); Manual for Streets (DfT, 2007); Traffic Advisory Leaflets (DfT, various). 	
6.9.8	Concern that the disruption and the increased traffic levels would impact on residents' quality of life.	-	-	-	2	10077; 10120	The Transport Assessment submitted as a part of the DCO application shows no significant change to traffic levels or traffic composition as a result of the Project. The majority of traffic will access the Application Site and subsequently the operational site from Advent Way (at the southern access or via Lee Park Way) so there will be no significant re-distribution of traffic close to residential areas. Construction traffic would be managed in accordance with the Traffic Management Plan as required by the Code of Construction Practice.	N
6.9.9	Concern that having additional access points would increase security and staffing costs.	-	-	-	1	95	The minor additional costs associated with the management of additional access points is outweighed by the operational benefits they provide.	N
6.9.10	Suggestions include: a) using water transport would eliminate the need for additional access points;	-	-	-	2	60; 10047	The Transport Assessment demonstrates that water transport is not feasible.	N
	b) pending an impact study on Montague Road, include an access point from the						An additional access from the north is proposed and will be used by some operational traffic arriving from this	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	north to separate the industrial and domestic traffic and avoid congestion on the North Circular Road.						direction. Advent Way will continue to be used as the main site entrance for operational vehicles.	
Eastern access point								
6.9.11	Lee Park Way should not be used as an additional access point because it is a wildlife habit that is sensitive to any increase in traffic levels.	-	-	-	1	85	Lee Park Way is an existing road, an access from Lee Park Way into the Edmonton EcoPark would be created to provide a separate site access for members of the public and visitors accessing the site. Landscaping measures are proposed along Lee Park Way which will enhance the habitats in this area.	N
Construction traffic								
6.9.12	Proposed measures are sufficient to mitigate the impacts of construction traffic.				2	68; 10047	Noted.	N
6.9.13	Comments on construction traffic routing include: a) do not use Hall Lane, Chingford as shortcut to access M25;	NG	-	-	1	72	The construction routes to be used will be agreed as part of the Construction Logistics Plan (CLP) required by the Code of Construction Practice. The use of Hall Lane will be discouraged and it is currently anticipated that construction traffic travelling to the M25 would do so via A406 North Circular Road and A10 Great Cambridge Road.	N
	b) in areas where it is required to cross the National Grid's gas pipeline, this should be done at agreed locations						It is not anticipated that construction traffic will cross National Grid's pipeline.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	and in accordance with National Grid's guidelines.							
6.9.14	Concern that the increased volume of traffic would impact on already busy roads; more vehicles mean dirtier roads.	-	-	-	4	10079; 72; 74; 10085	The Transport Assessment submitted as a part of the DCO application shows no significant change to traffic levels or traffic composition as a result of the Project. The effect of construction traffic will be mitigated using the Code of Construction Practice (CoCP) and Construction Logistics Plan (CLP). The CoCP will ensure that wheel washes are in place at the access points during construction.	N
6.9.15	Construction vehicle related suggested mitigation measures include:	-	-	-	4	10110; 10081; 10103; 82	Measures to ensure that the effect of construction traffic is kept to a minimum are set out in the Construction Logistics Plan and will be included in the Construction Logistics Plan.	N
	a) keep traffic levels and congestion down;						The Construction Logistics Plan includes details of the FORS (Fleet Operator Recognition Scheme) which the contractor will be required to register for. Low emission vehicles will be used where practicable.	N
	b) use Safer Urban Lorries with low emissions;							
	c) aim for zero accidents across the entire site, including at delivery and collection points;						The Construction Logistics Plan requires lorries to be fitted with appropriate 'active' equipment to warn the driver of the presence of cyclists. Lorries will also bear prominent signage. In the event of a collision, the collision will be investigated and a Collision Report prepared.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	d) ensure all tipper truck drivers have full clean driving licences;						As set out in the Construction Logistics Plan, all construction vehicle drivers will have their drivers licence checked before commencing work and will be required to undertake appropriate driver training and/or a TfL recommended driver's awareness course for travelling around London.	N
	e) introduce a penalty system in drivers' contract to penalise drivers at fault.						In the event of any incidents, an investigation will be undertaken and appropriate action will be taken where required.	N
6.9.16	Other suggested construction stage transport mitigation measures:	TfL	LBE	-	0	-	A traffic management plan will be prepared as required by the Construction Logistics Plan.	N
	a) design a construction logistics plan;							
	b) encourage sustainable travel while minimising overspill parking;						Sustainable travel will be encouraged through the construction Travel Plan. An appropriate level of parking is proposed and no overspill parking is anticipated.	N
	c) Phase 1d represents a significant transport impact and needs mitigating through the Construction Logistics Plan.						A traffic management plan will be prepared and mitigate any impacts arising during Stage 1d.	N
	Other mitigation measures include providing a travel plan.						Construction and Operational Travel Plans are appended to the Transport Assessment.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
Operational traffic								
6.9.17	Proposed measures are sufficient to mitigate against any envisaged operational traffic impact.	-	WCC	-	23	78; 80; 87; 10045; 10046; 10056; 10078; 10080; 10083; 10084; 10085; 10090; 10093; 10095; 10096; 10102; 10103; 10109; 10112; 10113; 10114; 10115; 10119	Noted.	N
6.9.18	Concerns raised that traffic volume would increase because: a) the Visitor Centre would attract more visitors;	-	-	-	7	74; 10075; 10080; 10082; 10088; 10091; 10120	Visitors to EcoPark House have been estimated, and numbers included in the overall assessment of trips to EcoPark House contained in the Transport Assessment. While the anticipated use of EcoPark House will include potential community and education use, the baseline for the assessment took into account visitors to the current facility (including for the regular tours) and so the increase number of visitors is not anticipated to have a significant impact.	N
	b) the increased waste management capacity would lead to higher number of waste vehicle trips;						An increase in the overall number of vehicles is anticipated but this is predicted to be less than 10 per cent when compared with the exiting Edmonton EcoPark. However, the proportion of HGV trips is expected to decrease.	N
	c) plans do not account for population increase as a						The cumulative assessment in the Transport Assessment accounts for both background growth and additional trips	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	result of planned housing developments;						due to other schemes in the area, including Meridian Water. The forecast increase in population is taken into account in the forecast need arisings as set out in the Need Assessment.	
	d) NLWA would have limited control over contractors' behaviour;						The Contractors will be subject to contractual arrangements to be agreed with the Applicant.	N
	e) increased traffic levels would lead to a higher number of accidents.						The number of HGVs is anticipated to decrease. Traffic safety measures set out in the Construction Logistics Plan. The new site access points have been subject to a Stage 1 Road Safety Audit as appended to the Transport Assessment.	N
6.9.19	Other comments on operational traffic include: a) use of RCVs and bulk haulers is inevitable; b) hope the proposed measures would be sufficient.	-	WCC	-	3	10094; 10087; 10092	Noted. For details of the measures and assessment refer to the Transport Assessment.	N
6.9.20	Suggested mitigation measures with regards to operational traffic include: a) prepare and update as required a Delivery and Servicing Plan;	TfL	-	-	0	-	A Delivery and Servicing Plan will be prepared and updated for each phase as required by the Environmental Commitments and Mitigation Schedule (AD06.03).	N
	b) take reasonable endeavours to influence collection authorities accessing the site alongside other vehicle						The operations of waste collection authorities are outside the remit of the Applicant.	

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	movements to minimise environmental and transport impact.							
6.9.21	Other suggested mitigation measures with regards to vehicles include: a) all tipper trucks should adopt the new safer design cabs;	-	-	-	3	5; 82; 85	The vehicles used by the waste collection authorities are outside the control of the Applicant and therefore it is not possible to require all tipper trucks to adopt this suggestion.	N
	b) all vehicles should go through a wash-down to prevent dust and debris transfer onto roads;						Washing facilities will be provided on site for waste collection authority vehicles to use. This is in accordance with current site practice.	N
	c) keep vehicles onto main roads.						Vehicles will use main roads (Transport for London Road Network and Strategic Road Network) where practical but will need to access the Edmonton EcoPark from Advent Way and Deephams Farm Road.	N
6.9.22	Other suggested mitigation measures include: a) monitor the amount, noise and timing of traffic;	-	-	-	9	66; 10077; 10079; 10081; 10086; 10101; 10106; 10108; 10116;	The number, size and timing of vehicles will be monitored using the weighbridges as required by the Environmental Permit. A noise assessment has been undertaken as part of the ES. The baseline noise surveys include noise from existing traffic and the number of vehicles using the site is not expected to change significantly.	N
	b) keep traffic levels/congestion down, especially during work days and rush hour;						The distribution of traffic through the day is documented in the Transport Assessment. The peak time for operational traffic is from 11:00 to 12:00	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							and so does not coincide with the highway peak hours.	
	c) prioritise the needs of local residents over those of contractors.						Traffic will use the Transport for London Road Network and Strategic Road Network as far as practicable and local residential roads will be avoided where possible. The Code of Construction Practice requires a dedicated e-mail address and phone line to be set up for enquires to be made during construction.	N
6.9.23	Traffic impacts during operation are best addressed through the Delivery and Servicing Plan and Travel Plan.	TfL	-	-	0	-	An Operational Travel Plan and Delivery and Servicing Plan will be prepared. A Framework Operational Travel Plan is included in the Transport Assessment and the Transport Assessment.	N
Rail transport								
6.9.24	Use rail transport during construction and operation to reduce traffic levels; there is a main rail line close to the site.	-	-	-	1	83	There is no direct rail link to the Edmonton EcoPark so transport by rail is not practical. Using a rail depot would still require waste and/or materials to be transported from a transfer station to the Edmonton EcoPark by road.	N
Water transport								
6.9.25	Agree with water transport report because: a) using water transport is too expensive; b) using water transport would impact adversely the river Lee and the wildlife along the river.	-	LBE	-	9	5; 80; 10046; 10047; 10056; 10079; 10080; 10082; 10094	Noted.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
6.9.26	Comments in support of moving freight by water include: a) using water transport would minimise traffic impacts on local roads;	CRT; TfL; GLA	WCC	-	9	60; 66; 74; 77; 82; 83; 88; 10120; 10086	An assessment of the effect of water transportation on traffic has identified that using water transport would only results in a small reduction (approximately 40 trips) per day.	N
	b) using water transport is more environmentally friendly as it reduces air pollution and carbon emissions. Over the 25 years project life-cycle the environmental benefits of water use would be significant and in the environmental appraisal capital costs need to differentiate from operational costs;						A full cost-benefit analysis, which considers the environmental benefits, has been undertaken and can be found in the Water Transport Study appended to the Transport Assessment submitted as a part of the DCO application.	N
	c) using water transport would support traditional jobs;						The Projects approach to employment is set out in the Vol 2 Section 9 of the ES.	N
	d) using water transport is more cost efficient in the long term; when calculating the cost of using rail/water transport, this should take into account the benefits it would provide to the public;						A full cost-benefit analysis of using water transport has been undertaken and can be found in the Water Transport Study appended to the Transport Assessment.	N
	e) it is too early to rule out transfer of freight by water and future feasibility study may be required;						The Project does not propose the movement of material by water based on the Water Transport Study appended to the Transport Assessment. EcoPark	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	f) investment in water transport could encourage other businesses in Lee Valley area to consider such option;						House would be located on the existing wharf and therefore it would not be possible to consider the feasibility of water transport at a later date.	
	g) consider building a wharf facility to allow future development of water transport;						There is an existing wharf on the Edmonton EcoPark which is proposed to be used for EcoPark House and will incorporate Edmonton Sea Cadet use of the Site, as such a wharf will not be available. Any future development of water use at this point would require further assessments, based on the circumstances current at that time, and taking into account the issues raised in the Water Transport Study.	N
	h) query if the infrastructure investment has wider benefits or potential funding sources.						The Applicant has undertaken a cost benefit analysis in respect of water transport for this Project.	N
6.9.27	Other comments on the water transport report include:	-	-	-	4	78; 92; 99; 10079	The Transport Report is necessary to inform the Project.	N
	a) the report is unnecessary and impractical;							
	b) do not waste money on anticipated transport problems;						The project includes measures necessary to mitigate for potential effects. Unnecessary measures are not proposed.	N
	c) NLWA's traffic plans should aim to minimise disruption to local residents.						The Transport Assessment indicates that the effect of the Project would be minimal.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
General traffic								
6.9.28	Concerns about increased traffic levels and the resultant noise and air pollution.	-	-	-	2	10120; 74;	The levels of traffic generated by the Project has been assessed in the Transport Assessment, and the noise and air quality implications traffic are assessed in Vol 2 Section 10 of the ES which concludes there would be no significant impact.	N
6.9.29	Concern that the lack of alternative transport might make certain jobs inaccessible to some people.	TfL	-		0	-	The Travel Plan will promote/encourage sustainable travel choices and ensure that all options for sustainable transport are explored.	N
6.9.30	Suggested mitigation measures aimed at minimising impacts on road users include:	CRT	-	LVRP A	1	10058	A route from Lee Park Way to the towpath is already available. There is not sufficient space to provide a convenient step-free route from the bridge to the towpath.	N
	a) provide a step free pedestrian and cycle access from canal bridge to towpath in both north and south directions;							
	b) use clear signage to ensure that Lee Park is not considered part of the industrial site;						Signage will be provided in accordance with the principles set out in the Design Code Principles (AD02.02).	N
	c) keep southern end of Lea Park Road free of all motor traffic to allow new or inexperienced cyclists practice cycling safely.						Vehicular traffic will only be able to use Lee Park Way between Advent Way and the new Edmonton EcoPark access point. The existing restrictions will remain in place north of this point. Facilities for cyclists and pedestrians will be provided along the section of Lee Park Way which will be used by vehicular traffic.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
6.9.31	Other suggested mitigation measures include:	TfL	LBE	-	0	-	The provision of cycle parking complies with the London Plan standards and ancillary facilities (showers and lockers) for staff are proposed. The provision of car parking is slightly higher than the London Plan requirements due to the fact that employees work shifts covering 24 hour and the site has the lowest possible Public Transport Accessibility Level (PTAL). The level of parking is significantly reduced when compared with the existing Edmonton EcoPark. Electric vehicle charging points will be provided in line with the London Plan.	N
	a) car and cycle parking and facilities should comply with London Plan and provide showers; lockers and electric vehicle charging;							
	b) comply with TfL procedures and processes and follow TfL's Transport Assessment best practice advice;						Where appropriate and relevant during the construction and operation of the Project, any necessary design approvals, traffic regulation orders and permits will be sought from TfL and LB Enfield. TfL's best practice guidance has been followed in the preparation of the Transport Assessment.	N
	c) comply with Edmonton EcoPark SPD and S106 SPD;						The Transport Assessment complies with the Edmonton EcoPark SPD.	N
	d) given the long term nature of the project and the resultant uncertainty over the actual increase in traffic volumes, contributions to highway mitigation measures are expected to						Most transport works included are included in the Project. Any additional measures necessary to mitigate for the effects of the project would be secured through the Section 106 Agreement.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	be secured through the Section 106 Agreement;							
	e) promote sustainable transport to encourage healthy lifestyle for workers.						The Travel Plans promoted sustainable transport and healthy lifestyles.	N
6.9.32	Comments on routing include: a) junctions that are most likely to be impacted are Cooks Ferry Roundabout, A1055 Meridian Way and Ardra Road;	-	LBE	LVRP A	0	-	The Transport Assessment assesses the impact on these junctions and shows there is no significant impact.	N
	b) ensure internal road network serving the site can withstand peak demand so Lee Park Way is not affected by vehicles parking and "backing up" on the access road to the south.						The design responds to peak demand and incorporates sufficient space for queuing within the Edmonton EcoPark.	N
Scope of assessment								
6.9.33	Support because the scope of assessment represents best practice, is compliant with industry standards and follows the scope TfL has advised on.	TfL; GLA	LBE	-	0	-	Noted.	N
Further assessment / studies are required								
6.9.34	Requests for further assessment / studies include: a) revise Transport Assessment to show clearly which trips are increasing and which are decreasing;	GLA	LBE	-	1	59	The Transport Assessment has been revised to show the trips by vehicle type (HGV, LGV and car) compared with the existing trips.	C

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	b) confirm if the methodology used to predict the volume of trips was the one agreed at the planning briefing stage;						The trip generation methodology is the same as that agreed as part of the Edmonton EcoPark SPD.	N
	c) more detailed analysis should be provided alongside Table 5.5 of the TA to explain the reduction of some trips and confirm the methodology used;						The Transport Assessment been revised to confirm the methodology used and to explain the reduction in trips.	C
	d) provide further analysis or summary on the junction operations before TEMPRO growth factors were applied, (i.e. pre 2024);						The Transport Assessment has been revised to include a summary analysis before TEMPRO growth factors were applied.	C
	e) Section 106 should include a Construction Management Plan setting out in more detail how access and service arrangements as well as sustainable measures will be provided;						A Traffic Management Plan is required by the Code of Construction Practice.	N
	f) assess construction programme and impact on operation of North Circular Road;						The impact of the Project on the A406 North Circular Road has been assessed in the Transport Assessment.	N
	g) design travel plans for operation and construction stages;						Framework Construction and Operational Travel Plans are appended to the Transport Assessment.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	h) obtain Section 106 agreement or other agreement for any necessary offsite mitigation measures;						Most transport works included are included in the Project. Any additional measures necessary to mitigate for the effects of the project would be secured through the Section 106 Agreement.	N
	i) provide a comparison of the current facility's traffic movements against those proposed;						The Transport Assessment has been revised to include a comparison between the existing and proposed trips.	C
	j) conduct water transport assessment;						A water transport report has been prepared is appended to the Transport Assessment.	N
	k) conduct waste traffic impact assessment.						A full assessment of the trips undertaken to and from the Application Site, including waste vehicles, in provided in the Transport Assessment.	N
Proposed measures								
6.9.35	The proposed shuttle bus is supported.	-	-	-	1	10081	Noted.	N
Requests for more information								
6.9.36	Request for information on cost: a) provide figures for switching to rail or/and water transport for construction and operational phases;	GLA; TfL	-	LVRP A	3	83; 10056; 10066;	Cost related: The costs of water transport are considered in the Water Transport Study appended to the Transport Assessment. It is not feasible to use rail transport to the Edmonton EcoPark due to the lack of a direct rail link, therefore this has not been considered.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
	b) what is the cost of building a wharf;						The cost of infrastructure associated with water transport is included in the Water Transport Study appended to the Transport Assessment.	
	Request for information on water transport: c) clarify if these different modes of transport have been compared on a fair basis;						Water transport related: Water Transport Study appended to the Transport Assessment compares options on a fair basis. The methodology used is set out in the Study.	
	d) does the combined water/road proposal represent a potential approach?						The Water Transport Study considers a combined water/road option.	
	e) what is the basis for the commercial costs assumed in the PBA report with regards to investment in the lock infrastructure and can we assume investment in these locks in the next few years?						Costs of all equipment and operations for water and road are based on first principles e.g. purchase cost of equipment, fuel, insurance, wages, number of units, assumed work hours etc. Cost of cranes, heavy plant, on-site lorries barges and tug were obtained from indicative quotes and for Thames haulage tug operation costs. Road transport costs are based on Road Haulage Association vehicle operating cost tables. Infrastructure costs are based on Peter Brett Associates' hydro engineers assessment cross referenced with CRT engineers. Long term cost considers capital and operating costs, and valued as post tax cash flow for a year-on-year predicted cost to a maximum of 25 years, with inflation assumed to be 2.5 per cent. The	

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Traffic and transport								
							final cost is expressed in today's terms using Net Present Cost of 8 per cent (NPV 8 per cent).	
	Request for other information: f) specify when you would no longer need, even as a contingency, any rail transfer facility for waste;						This is subject to operational requirements which are assessed at appropriate junctures, e.g. renewal of appropriate contracts.	
	g) was the day-to-day management of the visitor access factored in the traffic flows assessment;						Visitor access and trips has been assessed as part of the Transport Assessment.	
	h) how can existing footbridges be upgraded to enhance pedestrian environment along the river edge;						The Project does not include additional accesses to the river edge. The upgrading of existing footbridges is outside the scope of this Project. However the Project does include improvements to Lee Park Way which is a road bridge over the River Lee Navigation.	
	i) provide information on the construction period, along with the likely increase in road traffic during and after construction.						Information on the construction period, and the traffic flows during the construction period, are all provided in the Transport Assessment.	

Account taken of Phase Two traffic and transport comments

6.9.37 There was general support for the proposed access points to the Edmonton EcoPark, with respondents noting that the additional access points would help reduce congestion, make the Edmonton EcoPark accessible and provide the opportunity to create a public frontage along the River Lee Navigation. Some respondents noted that all accesses should be designed safely. In response Stage 1 Road Safety Audits have been included in the Transport Assessment.

- 6.9.38 One respondent considered that the new access on Lee Park Way is not appropriate as this is an area for wildlife. Lee Park Way is an existing road and landscaping measures are proposed along the road which would enhance habitats in this area.
- 6.9.39 Several comments raised concern that there could be negative impacts from construction traffic. The effect of construction traffic would be mitigated using the CoCP and Construction Logistic Plan (which is required by the CoCP). Several mitigation measures were suggested which were already included in the Project, including producing a Construction Logistics Plan, encouraging sustainable travel and preparing a Travel Plan.
- 6.9.40 In respect of operation traffic some respondents considered the proposed measures to be sufficient to mitigate for any impact. Others were concerned that there would be an increase in traffic. An increase in the overall numbers of vehicles is anticipated, but this is expected to be less than 10 per cent when compared with the existing Edmonton EcoPark. However the proportion of HGV trips is expected to decrease.
- 6.9.41 Mitigation measures suggested for operational traffic include a wash down facility, using main roads and implementing a Servicing and Delivery Plan. These measures are all proposed as part of the Project. Some of the mitigation measures suggested are outside the control of the Applicant and therefore are not proposed, for example new safer design cabs for tipper trucks.
- 6.9.42 Some respondents agreed with the Applicant's assessment that it is not viable to use water transport as part of the Project. Others considered that the option to use water transport in future should remain open. A full cost-benefit analysis of water transport has been undertaken and can be found in the Water Transport Study appended to the TA.
- 6.9.43 There were several comments noting the importance of providing suitable facilities for pedestrians and cyclists accessing the Edmonton EcoPark. Cycling parking would be provided in accordance with the London Plan standards. New facilities for pedestrians and cyclists would be provided along Lee Park Way.
- 6.9.44 Two comments suggested that parking on-site during operation should comply with the London Plan standards. The proposed number of car parking spaces is slightly higher than the London Plan standards due to the fact that employees work shifts covering 24 hours and the site has a low Public Transport Accessibility Level (PTAL).
- 6.9.45 Some detailed comments on the approach to the TA were provided and the document has been updated accordingly.

6.10 Visitor Centre

6.10.1 The comments raised in respect of the visitors centre issues during Phase Two Consultation are summarised in Table 6.9, together with the Applicant's response.

Table 6.9: Comments on the visitor centre received in Phase Two Consultation

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Visitor centre								
Visitor centre								
6.10.2	Support the principle of a visitor centre.	-	-	-	26	5; 63; 78; 87; 94; 95; 10046; 10075; 10085; 10088; 10089; 10090; 10091; 10094; 10097; 10100; 10103; 10106; 10108; 10109; 10111; 10112; 10114; 10117; 10118; 10120	Support is noted and welcomed.	N
6.10.3	Support because it would benefit the local area by: a) attracting visitors; b) helping reduce littering; c) offering free compost to local residents.	-	-	-	12	10045; 10081; 10099; 10101; 10102; 10104; 10105; 10107; 10110; 10115; 10119; 10120		N
6.10.4	Support because it would serve as a source of information and would enhance knowledge of waste management.	-	WCC; LBE	LVRPA	23	62; 68; 80; 83; 94; 10047; 10076; 10078; 10081; 10082; 10083; 10084; 10087; 10092; 10093; 10095;		N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Visitor centre								
						10096; 10098; 10099; 10101; 10102; 10105; 10116		
6.10.5	Support if is well-maintained.	-	-	-	1	10086	EcoPark House will be managed and maintained by the future operator of the Edmonton EcoPark.	N
6.10.6	Oppose because: a) there would be no public demand;	-	-	-	4	66; 86; 99; 89	EcoPark House would provide facilities for those taking tours of the proposed ERF, which would continue to be provided as they are now of the existing EfW facility.	N
	b) it is designed for PR purposes.						EcoPark House is intended to educate the local community and others about the waste hierarchy and energy production.	N
Suggestions								
6.10.7	Suggested alternatives include: a) have it as an online space with education videos;	-	-	-	2	66; 77	It would not be possible to achieve the same level of engagement and education if an online facility were provided. Furthermore, the Edmonton Sea Cadets require a physical base which has access to the wharf.	N
	b) use the money to promote recycling/launch an awareness campaign.						NLWA already has active programmes to encourage waste prevention, re-use and recycling. NLWA's "Wise up to Waste" campaign has more details of this activity (See: http://www.wiseuptowaste.org.uk/).	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Visitor centre								
6.10.8	Suggested facilities include:	-	-	-	3	10090; 10120; 10086	EcoPark House includes space for educational uses.	N
	a) educational centre for eco-learning projects;						EcoPark House includes space for community uses which will be available for hire by local groups.	N
	b) social space for local groups of all ages;						Catering facilities for those using the building will be provided, however a café is not proposed since the visitor numbers are unlikely to be sufficient to warrant this.	N
	c) café;						There is not sufficient space in EcoPark House to accommodate a multi gaming/sports ground.	N
	d) a multi-gaming/sport ground.							
6.10.9	Facilities are EcoPark House should be free of charge, user friendly and accessible to all sections of the community, including children and adults with disabilities.	-	-	-	3	10113; 10080; 10079	Any pricing policy will be determined shortly before the facility opens, however NLWA is a public authority and it is unlikely to be in the public interest to provide the facilities completely free of charge. EcoPark House will be designed to be accessible to all potential user groups.	N
6.10.10	Improve the tow path by river Lea to provide a safe cycling route.	-	-	-	1	82	Improvements to the towpath are outside the scope of the Project however a cycle lanes will be provided along Lee Park Way as part of the Project.	N
6.10.11	The Visitors Centre should be advertised.	-	-	-	1	79	Suggestions for operation of EcoPark House will be taken into account prior to opening.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Visitor centre								
Uses								
6.10.12	The Visitor Centre should serve as: a) educational centre; b) community space; c) destination for river users.	-	-	-	4	10046; 92; 88; 82	EcoPark House would provide facilities for educational and community uses and to accommodate the Edmonton Sea Cadets who regularly use the River Lee Navigation.	N
Sea Cadets								
6.10.13	Support proposals to retain the Edmonton Sea Cadets on EcoPark site.	CRT	-	LWL; LVRPA	1	10047	Support is noted and welcomed.	N

Account taken of Phase Two Visitor Centre comments

- 6.10.14 There was support for the inclusion of EcoPark House (the visitors' centre) in the Project, with responses noting that it would serve as a source of information and enhance knowledge of waste management, enables the Edmonton Sea Cadets to remain on-site and would attract visitors. Other respondents considered that there would not be demand for a visitors centre and it is a PR exercise.
- 6.10.15 Some respondents suggested alternatives to a visitor's centre including an online space and launching an awareness campaign. It would not be possible to achieve the same level of engagement using an online space and the NLWA already has active programmes to encourage waste prevention, re-use and recycling.
- 6.10.16 Facilities suggested to be included in the visitor's centre include space for education and community uses, both of which are incorporated. Other suggestions include a café and multi-gaming/sports ground which are not incorporated because there would not be sufficient visitor numbers to warrant a café and there is not sufficient space to accommodate a multi-gaming/sports ground.
- 6.10.17 Suggestions for the management and operation of EcoPark House were made, for example it should be advertised and free of charge. These would be taken into account prior to opening.
- 6.10.18 The height of EcoPark House has been reduced from three to two storeys in response to comments raised during Phase Two Consultation, as noted in Section 6.6.

6.11 Cooling technology

6.11.1 The comments raised in respect of the cooling technology issues during Phase Two Consultation are summarised in Table 6.10, together with the Applicant's response.

Table 6.10: Comments on the cooling technology received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
Views on air cooled system								
6.11.2	Support without giving a specific reason	-	-	-	14	10113; 10108; 10110; 10111; 10095; 10098; 10106; 10092; 10093; 10094; 10083; 10085; 10091; 70	The Applicant has considered the comments raised during consultation and with the benefit of professional advice, has taken account of all the relevant factors and has determined that the cooling technology would be air cooled condensers.	C
6.11.3	Support because it is more cost efficient as it requires less maintenance	-	-	-	2	10047; 95		C
6.11.4	Support because it is better for the environment; water cooled system would impact on Lee Valley river's ecosystem by releasing warmer water into the river	-	-	-	2	75; 95		C
6.11.5	Support because it does not create plume	-	LBE	-	20	10120; 10105; 10112; 10119; 10090; 10096; 10101; 10086; 10087; 10088; 10079; 10080; 10046; 5; 62; 63; 64; 65; 74; 98		C

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
6.11.6	Support because it uses less water	-	-	-	1	74		C
6.11.7	Support because it would cause less corrosion than water cooled system	-	LBE	-	0	10071		C
Views on Water cooled system								
6.11.8	Support without giving a specific reason	CRT	-	-	13	66; 10114; 10115; 10118; 10100; 10102; 10109; 80; 10084; 10089; 10045; 10056; 92	The Applicant has considered the comments raised during consultation and with the benefit of professional advice, has taken account of all the relevant factors and has determined that the cooling technology would be air cooled condensers.	N
6.11.9	Support because it has higher energy output	-	-	-	10	10116; 10117; 10103; 10104; 10107; 10082; 10097; 10099; 87; 79		N
6.11.10	Support because it is environmentally friendly as it reduces air heating	-	-	-	1	83		N
6.11.11	Support because it would create more jobs for local people due to increased maintenance requirements	-	-	-	1	10081		N
6.11.12	Support if water is cleaner	-	-	-	1	79		N
6.11.13	If water is abstracted from the Lee Navigation, a license from CRT would be required	CRT			0		Water is not proposed to be extracted from the River Lee Navigation for either type of cooling technology.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
6.11.14	Oppose because it increases the rate of corrosion of buildings	-	LBE	-	0	-	The Applicant has considered the comments raised during consultation and with the benefit of professional advice, has taken account of all the relevant factors and has determined that the cooling technology would be air cooled condensers.	N
Alternative								
6.11.15	Suggested alternatives include: a) use Combined Cooling, Heating and Power systems similar to those in Barcelona, Monaco, Baltimore;	-	WCC	-	1	89	Cooling is a necessary part of the ERF operation. This is separate to any cooling which could be provided as part a district heating network. It is possible for the heat from the ERF to be used for cooling rather than heating and this would be determined by any future heat network operator.	N
	b) technology in 2040 should be advanced enough not to require the use of a cooling system						The proposed ERF uses today's best available technology. The Applicant is seeking sufficient flexibility within the DCO Application to be able to assess the detailed solution before procurement allowing potential upgrading at this point, however it is considered unlikely that technology would have advanced to such a position whereby cooling was not required.	N
Criteria								
6.11.16	Views on cost: a) cost should not be the main factor; b) go for the cheaper option	-	-	-	2	79; 10042	The Applicant considered a number of factors in reaching its decision to use air cooling technology, these included comments raised during consultation, visual impact, maintenance, efficiency and cost.	N
6.11.17	Choose the most energy efficient option	-	-	-	3	10078; 77; 10047		N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Cooling system								
6.11.18	Choose the most environmentally friendly option	-	HBC	-	4	10075; 10077; 88; 85	Neither cooling technology would create significant environmental effects. The comments made will be taken into account by the Applicant in reaching its decision on the cooling system.	N
No comment/opinion/preference								
6.11.19	No views	-	-	-	5	10077; 94; 86; 78; 68	Noted.	N
Water vapour								
6.11.20	Concerning because: a) can be a distraction to drivers; b) exacerbates negative perceptions on the current site	-	LBE	-	1	82	The Applicant has considered the comments raised during consultation and with the benefit of professional advice, has taken account of all the relevant factors and has determined that the cooling technology would be air cooled condensers which would not create plume.	C
Requests for more information								
6.11.21	More detail on: a) use of water for cooling of plant i.e. where would this come from, where would it be disposed of, how would it be cleaned; b) whether there are any additional benefits, e.g. cooling the surrounding area/keeping dust down on roads during summer days	CRT	-	-	2	82; 77	The Applicant has considered the comments raised during consultation and with the benefit of professional advice, has taken account of all the relevant factors and has determined that the cooling technology would be air cooled condensers as such water for cooling is not necessary. Cooling is a necessary part of the ERF process. The cooling process would not have any wider effects such as cooling the surrounding area or keeping dust down on roads during summer days.	N

Account taken of Phase Two cooling technology comments

- 6.11.22 Comments raised during Phase Two Consultation were, on balance, in favour of avoiding the plume because of its visual impact and the potential for considering it to be smoke. In response the Applicant is proposing air cooled condensers which would not generate a plume.

6.12 Consultation process

6.12.1 The comments raised in respect of the consultation process during Phase Two Consultation are summarised in Table 6.11, together with the Applicant's response.

Table 6.11: Comments on the consultation process received in Phase Two Consultation

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
Consultation process								
6.12.2	Welcome the opportunity to work in partnership with NLWA in the work the GLA is undertaking on their Development Infrastructure Funding Study.	GLA	-	-	0	-	Opportunities for partnership working between NLWA and GLA will be discussed as part of on-going engagement.	N
6.12.3	Challenges to the consultation process include: a) lack of communication with Phase 1 consultees with regards to the publication of the Stage 1 feedback report and the opening of Stage 2 consultation;	-	-	-	4	59; 10052; 10060; 10066;	The Phase One Consultation Feedback Report was published on NLWA corporate website and on the Project website during Phase Two Consultation. A copy was also available at the Phase Two Consultation exhibitions. All respondents to Phase One Consultation who wished to be notified of activities were notified about the start of Phase Two Consultation.	N
	b) no regard has been given to all items raised; responses have been clustered in broad themes often met with generic answers;						All responses have been carefully analysed and considered. Responses are reported thematically in order to present them in a way which is easy to understand.	N
	c) response channels were confusing.						Feedback forms enabled people to give structured responses to	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							proposals. Written responses in the form of e-mails and letters were also accepted. There were a range of ways in which feedback forms could be submitted including online, completing a hard copy at an exhibition or posting a hard copy to the FREEPOST address.	
6.12.4	Respondents were unaware of the first stage of the consultation.	CRT	-	-	1	10087	<p>Canal and River Trust (CRT) were notified of Phase One Consultation by letter. Two meetings were also held as part of the Applicant's informal consultation between February and May 2015.</p> <p>Phase One Consultation was undertaken in accordance with our published Statement of Community Consultation. It was advertised in all seven north London boroughs and widely in the newsletter zone (1,500m radius around the Edmonton EcoPark) through adverts, newsletters, leaflets to libraries and schools.</p>	N
6.12.5	Request for the duration of the Phase Two Consultation to be extended as not enough time was provided to analyse the carbon floor modelling.	-	-	-	1	88	The WRATE assessment was published after the commencement of Phase Two Consultation on 24 June 2015 following a specific request for this document. Phase Two Consultation ran for 44 days and therefore exceeded the statutory requirement for consultation to last at least 28 days.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
6.12.6	Suggestions for improving the consultation process include: a) follow NLWP's consultation practice;	-	-	-	1	10052	Consultation on the Project has been undertaken in accordance with the Planning Act 2008 (as amended) which sets specific requirements for consultation on all Nationally Significant Infrastructure Projects. Consultation practice on the NLWP, which is a statutory plan which is prepared in accordance with the provisions of the Town & Country Planning Act 1990, which is different and not applicable to the requirements for a DCO which is completed in accordance with the Planning Act 2008 (as amended).	N
	b) re-circulate an in-depth report outlining all comments received during the consultation process.						The Phase One Consultation Feedback Report was published during Phase Two Consultation on NLWA's corporate website and the Project website, as well as being available at exhibitions. The information contained in the Feedback Report is also contained in this report.	N
6.12.7	The following documents were suggested to be considered in the preparation of the Application: a) Principle of development - London Plan; b) Waste - London Plan; the Municipal and Business	GLA	-	-	0	-	The Applicant has considered all of these documents as part of the Application. The Planning Statement sets out the long list of national, regional and local policy considered.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	<p>Waste Management Strategies;</p> <p>c) Energy - London Plan; Climate Change Mitigation Energy Strategy;</p> <p>d) Air quality - London Plan; the Mayor's Air Quality Strategy;</p> <p>e) Ambient noise - London Plan; the Mayor's Ambient Noise Strategy;</p> <p>f) Transport - London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG</p> <p>g) Crossrail - London Plan; Mayoral Community Infrastructure Levy;</p> <p>h) The National Planning Policy for Waste (October 2014);</p> <p>i) The Upper Lee Valley Opportunity Area Planning Framework, July 2013;</p> <p>j) The Edmonton Eco Park Planning Brief, Supplementary Planning Document, May 2013; and</p> <p>k) Central Leaside Area Action Plan (submission version-consultation period, 5 January - 16 February 2015).</p>							

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
Events								
6.12.8	Disappointment that at one of the consultation events, members of staff could not provide information if the Resource Recovery Facility would be offered free of charge.	-	-	-	1	10042	The exhibitions were staffed by members of the Project team who have a detailed knowledge of the Project. At the time of the exhibitions it had not been confirmed whether the RRC (the publically accessible part of the RRF) will be provided free of charge for residents. It has since been confirmed that the RRC will be free of charge for residents.	N
Materials								
6.12.9	Challenge the consultation process because: a) consultation materials are not user-friendly;	-	-	-	3	60; 79; 10075	A range of materials were provided at Phase Two Consultation, to ensure that information was as accessible as possible. Materials at Phase Two Consultation included three videos (with subtitles) which provided an easy to understand overview of various elements of the Project.	N
	b) website links to documents were not working.						The Website was monitored throughout the consultation period. There was one period during Phase One Consultation when there was a broken link on the online feedback form. The Applicant was notified of this on 17 January 2015 by an exhibition attendee and the problem was rectified on 19 January 2015. There were no known downtimes during Phase Two Consultation. The website included contact details	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							allowing for users to notify the Applicant of any access problems.	
6.12.10	Suggestions to improve the consultation process: a) provide a 3D mockup model of the facility;	-	-	-	1	79	The development of a 3D model for use at consultation events was considered, but this was considered to be too costly. Therefore, the video shown as part of Phase Two Consultation includes a 3D model of the proposed facility, which helped participants to visualise proposals.	N
	b) use graphs rather than bullet points						The aim was to make the information presented at consultation as accessible as possible. For this reason, information was provided in bullet point form to enable interpretation. The documents submitted with the DCO application include graphs, where relevant.	N
Information								
6.12.11	Satisfied with the level of detail and quality of information	-	WCC	LVRPA	12	5; 68; 77; 80; 86; 87; 92; 94; 99; 10046; 10088; 10089	Noted and welcomed.	N
6.12.12	Challenge because the provided information was: a) technical, extensive and difficult to understand;	-	-	-	7	74; 78; 79; 88; 89; 10052; 10120	Whilst the information presented was based on the findings of technical reports, the website, exhibition boards and consultation booklet provided a simplified version in order to make it as accessible as possible. Links to/copies of the full versions of technical documents were also provided. Three videos were also	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							produced to provide an easy to understand overview of the Project.	
	b) difficult to find;						Information was available in a range of formats including hard copies at the exhibitions and online.	N
	c) biased and not balanced;						The assessments presented during Phase Two Consultation have been undertaken in accordance with all applicable guidance and regulations. They present an accurate recording of the effects of the Project and are reported in an unbiased way.	N
	d) did not answer questions raised during Phase 1;						Significant additional information was provided during Phase Two Consultation in response to requests made during Phase One Consultation. The information provided is described in Section 5. All comments were reviewed and reported in the Phase One Consultation Feedback Report which was made available prior to Phase Two Consultation.	N
	e) the carbon report, should have been provided earlier to give consultees enough time to analyse it.						The WRATE assessment was published after the commencement of Phase Two Consultation in response to a specific request for this document. It is not a requirement to publish all information to be submitted with the Application as part of pre-application consultation, nevertheless the Applicant published a broad range of information including the Interim	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							Sustainability Statement which references the findings of the WRATE assessment.	
6.12.13	Suggestions: a) keep people living in the local area informed;	PHE	-	-	4	10088; 66; 89; 10042	The Applicant intends to maintain engagement on the Project in the future. During Construction the Code of Construction Practice states that the Applicant will establish a dedicated website, established a Community Liaison Group and provide a dedicated e-mail address and telephone line for enquiries. In the longer term EcoPark House presents an opportunity for continued community engagement.	N
	b) provide more detailed information;						The level of detail provided is commensurate with a project of this scale and nature at this stage in the process. The Draft DCO requires further details to be approved by LB Enfield at relevant stages.	N
	c) engage the local community by doing more work in schools, public areas;						EcoPark House presents an opportunity for further engagement with the community and schools in the future. More detailed arrangements for the use and management of EcoPark House will be developed prior to its opening.	N
	d) do not call the proposed facility EcoPark as it is not in line with its function						Edmonton EcoPark is the existing name and it is not proposed to change it.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
Requests for more information								
6.12.14	Request for information on compost:	-	-	-	2	68; 66	Compost will not be produced on-site as part of the Project. Composting will be provided by third parties off-site and it is not possible at this stage to confirm the exact locations and therefore transport cost.	N
	a) where will composting go and what would be the transportation cost implications;							
	b) will local people be able to purchase it from the site						Composting will no longer be produced on-site and as such will not be available from the site.	N
6.12.15	Request for information on cost:	-	-	-	4	66; 10052	An update to the cost assessment for Project, including EcoPark House, will be undertaken prior to procurement.	N
	a) what would be the cost of building and running the Visitors' Centre;							
	b) what would be the cost to local taxpayers if the built in overcapacity leads to import of waste;						The facility has been sized to meet the forecast need taking into account the financial risk of under-capacity. Should there be spare capacity other sources of residual waste will be available both from within NLWA area and beyond. Refer to the Need Assessment (AD05.04) for more information.	N
	c) provide references to prove that ERF/EFW is the most cost effective option.						The Alternatives Assessment (AD05.03) provides a high level summary of the cost-effectiveness work undertaken by the Applicant for the provision of an EfW facility, in comparison to other options.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
6.12.16	Request for information on Project compliance with other strategies:	GLA	-	-	1	10052	The facility has been sized to meet the forecast need taking into account the apportionment targets, please refer to the Need Assessment submitted as part of the DCO application for more information.	N
	a) why has NLWA planned to process more waste than its allocated Apportionment;							
	b) given that the four original scenarios in NLJWS were not developed beyond 2020, which strategy NLWA refers to when it argues that 50% recycling target is consistent with existing strategy; can areas of conformity between the present proposal and this existing strategy be highlighted;						The Applicant considers 50 per cent to be an achievable, but not easy target within north London and therefore, as set out in the Need Assessment, has not assumed for the purposes of modelling a higher target. The North London Joint Waste Strategy is broadly technology neutral but was prepared in the context of a different Mayors Waste Strategy from the currently policy framework. Updated waste policies for the region are taken into account in the development of this proposal. Refer to Need Assessment for more information. It is not proposed to updated the North London Joint Waste Strategy formally at this stage as it is no longer a statutory requirement but the strategic issues raised have been considered in the Application documents specifically the Planning Statement, the Need Assessment and the Alternatives Assessment Report.	N
	c) provide more information on how the proposed facility would meet the Mayor's						The Sustainability Statement and Buildings Energy Statement submitted with the DCO application	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	carbon intensity floor CO ₂ standard to comply with London Plan waste policy;						provide details of the carbon dioxide and wider sustainability targets for the Application.	
	d) provide more information if the proposed facility contradicts FALP objectives.						An assessment of the Project against the Further Alterations to the London Plan (March 2015) policy is set out in the Planning Statement submitted as a part of the DCO application.	N
6.12.17	Request for information on scale of private involvement, e.g. PPP.	-	-	-	1	66	Funding arrangements will be put in place once the DCO is granted. Therefore, the scale of private involvement will be determined at the commencement of the procurement phase of the project.	N
6.12.18	Request for information on what plans are in place to target commercial revenue on the power export side, as well as tax revenue on the waste disposal side of the business.	-	-	-	1	95	These aspects of the Project are subject to commercial agreements which will be put in place at the appropriate time. Targeting of power revenue is inherent in electricity generation and export to the grid and the contracts will be considered at the appropriate time. Any fiscal benefits associated with energy generation will be reviewed and incorporated into the funding structure for the Project closer to its implementation.	N
6.12.19	Request for information on the consultation process: a) will there be another consultation for those most affected by the construction stage of the project;	-	-	-	2	10080; 10052	There are no further planned stages of consultation by the Applicant. As part of the statutory process anyone is able to register as an interested party with the Planning Inspectorate once the application has been accepted. Through this they will be kept	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							informed of application process and provided with opportunities to present their case on proposals. The Code of Construction Practice also states that the Applicant will take reasonable steps to engage with the community during construction.	
	b) has NLWA been fully transparent throughout the consultation process.						The Applicant has been transparent throughout the consultation process. Phase One and Two Consultations have been held in accordance with the published SoCC, regulations and guidelines set out pursuant to the Planning Act 2008 (as amended). Feedback from both Phases has been carefully considered, reported in the Phase One Consultation Feedback Report and in this report, and informed the development of the Project.	N
Will provide comments at a later stage								
6.12.20	Some respondents stated that they wished to reserve their right to provide further comments when finalised reports are published or if more information becomes available.	GLA; NE; PHE	LBE	-	0	-	Noted. As part of the statutory process anyone is able to register as an interested party with the Planning Inspectorate once the application has been accepted. Through this they will be kept informed of application process and provided with opportunities to present their case on proposals.	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
Resubmitted questions/points from Phase One Consultation								
6.12.21	One respondent resubmitted their response to Phase One Consultation.	-	-	-	1	10052	All responses received during Phase One Consultation were carefully considered and analysed as set out in the Phase One Consultation Feedback Report. All comments are set out in the tables in Section 4.	N
6.12.22	Strategy: a) NLWA should develop a comprehensive future waste resource strategy that includes financially and risk assessed what-if scenarios, including a reducing waste future;	-	-	-	1	10052	<p>This response was expressly submitted as a Phase Two response the answers remain the same as those provided in the Phase One response tables which have been copied below for convenience. Where there are updates to the answer in line with subsequent updates to the Project these are noted in bold. Many of the comments are similar to those received in Phase Two Consultation responses, and the Tables in Section 6 are therefore also relevant.</p> <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 per cent recycling rate for household waste. The methodology was clearly set out in the Need Assessment document, published 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.</p>	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							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. (Paragraph 4.5.20)	
	b) NLWA should develop and assess smaller capacity ERF plant options, which could be expanded over time;						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 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,	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							however should this be the case a new application would be required. (Paragraph 4.5.30).	
	c) What strategy underpins the business case for the proposed ERF plant, given that NLJWS expires in 2020 and its focus is purely on municipal waste?						<p>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. The scheme is being brought forward to replace the existing EfW facility and ensure continued sustainable treatment of north London's residual waste. (Paragraph 4.5.23).</p> <p>The strategic issues raised in the NLJWS have been considered in the Application documents specifically the Planning Statement, the Need Assessment and the Alternatives Assessment Report.</p>	
	d) Why do the proposals focus strategically on one of the very lowest ranking elements of the Waste Hierarchy?						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: http://www.wiseuptowaste.org.uk/).	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							The need case is based on the central recycling scenario of 50 per cent, 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). (Paragraph 4.5.19)	
	e) Given that the proposals state that in total fewer waste processes would take place at Edmonton EcoPark compared to today, does this mean that some of the processes would be outsourced to an alternate location and how would this conform with the aspirations for co-location of facilities to reduce land take?						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. (Paragraph 4.5.23)	N
	f) How have the proposals been formally assessed and agreed by the other seven Partner Authorities within the context of the approved NLJWS?						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. The applicant has consulted with partner authorities, including the seven NLWA boroughs, on the use of recycling target assumptions in the modelling. (Paragraph 4.5.23).	N
	g) Will the NLJWS Implementation Objectives be reviewed following the decision not to follow the SRF Procurement route							N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							It is not proposed to update the NLJWS formally at this stage as it is no longer a statutory requirement but the strategic issues raised have been considered in the Application documents specifically the Planning Statement, the Need Assessment and the Alternatives Assessment Report.	
6.12.23	Waste forecasting: a) Why has a low recycling scenario been assumed; given that in 2051 the plant would be processing 65% of anticipated waste at that time, this implies a recycling level of only 35%; this implied recycling level would be even lower in preceding years when the absolute waste levels are expected to be smaller but the full ERF capacity is employed;	-	-	-	1	10052	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 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which was 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.	N
	b) Why have low forecast recycling levels for C&I waste been assumed? These are very low compared with national C&I targets and when compared directly with HHLD recycling levels?						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). (Paragraph 4.5.19). The modelling assumptions regarding the forecast growth in	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	c) Why has zero recycling level for Other Waste been assumed given?						residual C&I waste market share has been agreed with each Constituent borough as representing a reasonable assumption in light of each borough's plans in this area. Other waste includes fly-tipped waste, Construction and Demolition (C&D) waste, ground clearing waste, highways waste, and asbestos waste. Given the uncertainty regarding changes in 'other' waste streams in the future, and the relatively low proportion of the overall waste arisings represented, for forecasting purposes it has been assumed that these 'other' waste arisings will remain static at 2012/13 levels for the duration of the modelling period (i.e. out to 2050/51).	N
	d) Why is there no assessment of plant implications of the single waste forecast versus the alternate Central and High Recycling scenarios?						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 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In	N
	e) Why is there no assessment of the effect of lower (or higher) waste levels versus the Low Recycling scenario and by extension versus the Central or High Recycling scenarios?							N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							<p>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. (Paragraph 4.5.21).</p>	
	f) Is there integration between the ERF proposal and the North London Waste Plan (NLWP2)?						<p>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</p>	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	g) Have the implications of the ERF proposal on the NLWP (2) been assessed?						<p>authorities. It is understood, through liaison with the North London Waste Plan (NLWP) process, in which the NLWA is a key stakeholder that the NLWP data studies will take into account the forecasting carried out for this Project. (Paragraph 4.5.22).</p> <p>The North London Waste Plan was subsequently published for consultation in July 2015. The consultation draft safeguards the Edmonton EcoPark as an existing waste management site and acknowledges this Application.</p>	N
	h) Given that NLWA is planning to move beyond its Apportionment target, where would the additional volume of waste come from?						<p>The facility has been sized to meet the forecast need taking into account the apportionment targets, please refer to the Need Assessment submitted as part of the DCO application for more information.</p> <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</p>	

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Views on the consultation process								
							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 area in contravention of the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026. (Paragraph 4.5.20)	
6.12.24	Overprovision: a) Provide information on why when comparing recent waste forecasts from North London's waste bodies there is a difference of circa 100,000 tonnes pa;	-	-	-	1	10052	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. (Paragraph 4.5.21)	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	b) Why has it been assumed that NLWA's share of business waste would increase and how is NLWA planning to achieve this? Why is there no further improvement expected post 2025?						<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 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, 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</p>	N
	c) Why has it been assumed that WCA's are going to collect increased volumes of C&I waste and that NLWA would double its share of such waste?							N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							which uses population growth as the basis. (Paragraph 4.5.21)	
	d) Recent data from the eight Partner Authorities plus the GLA / London Plan combine to indicate a possible 50% difference between highest and lowest forecasts in 2051; why is there no assessment of the different forecasts?						<p>A WRATE (an Environment Agency tool for environmental assessment) assessment which includes covers carbon comparative analysis is currently being undertaken and will be available at Phase Two Consultation.</p> <p>Further cost information will be available at Phase Two Consultation 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> <p>In developing this scheme, NLWA has been working with the seven boroughs as its partners. (Paragraph 4.5.23)</p>	N
	e) Is it sensible to use GDHI metric to determine households' waste outputs given it is unclear how current macro geopolitical factors would play out?						<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 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In</p>	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
							<p>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. (Paragraph 4.5.21)</p>	
	f) Would feedstock be imported and what are the implications for this?						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	N
	g) Would high relative calorific value (CV) feedstock be available given that EU wide recycling strategy is looking to remove higher CV items							N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	such as paper, card, textiles from the waste streams? Would this lead to recyclate being utilised to make up for shortfalls in residual waste?						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. (Paragraph 4.5.27).	
	h) What implications would overprovision have for the total waste allocated land requirement being considered under the NLWP(2)?						The ERF would be located within the Edmonton EcoPark on a part of the site currently used for other waste treatment facilities. The whole Edmonton 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.. (Paragraph 4.5.25)	N
6.12.25	Other: a) Provide a full lifetime comparison of water borne costs versus alternates to determine the appropriate transport option(s)	-	-	-	1	10052	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 Transport Assessment to be submitted with the DCO application. (Paragraph 4.8.5).	N

Ref	Issue	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Views on the consultation process								
	b) Why is rail transport not considered despite this being put forward by NLWA in responding to the NLWP(2)?						There is no direct rail link to the Edmonton EcoPark so transport by rail is not practical. Using a rail depot would still require waste and/or materials to be transported from a transfer station to the Edmonton EcoPark by road.	N

Account taken of Phase Two Consultation process comments

- 6.12.26 Some respondents considered that there has been a lack of communication with Phase One consultees and suitable regard had not been given to the comments raised during the first round of consultation. All responses were carefully analysed and considered and reported in the Phase Two Consultation Feedback report which was available on the NLWA corporate website, the Project website and at the Phase Two Consultation exhibitions.
- 6.12.27 Respondents suggested several documents to be considered in the preparation of the Application. All of the documents suggested have been considered by the Applicant in the preparation of the Application.
- 6.12.28 Some respondents were satisfied with the level of detail and quality of information available, whereas others felt that the materials were not user friendly, too technical or difficult to find. Information was presented in a variety of forms, including three videos, technical reports, a website, exhibition boards and consultation booklet, in order to make it as accessible and easy to understand as possible.
- 6.12.29 There was one request for the consultation period to be extended to allow time for the WRATE Assessment which was published during the Consultation period to be considered. Phase Two Consultation ran for a period of 44 days and therefore exceeded the statutory requirement for consultation to last at least 28 days.
- 6.12.30 There were a number of requests for additional information, including where composting will go, the cost of the Project, compliance with other strategies, how the proposed facility would meet the Mayor's carbon intensity floor CO2 standard and the scale of private involvement. Much of this information is contained in Application documents, and these have been referenced in the table above. In other cases the information is not available at this stage in the Project.

7 Informal engagement

7.1 Introduction

- 7.1.1 In addition to the formal statutory phases of consultation, the Applicant held informal discussions with key statutory consultees and other stakeholders during the pre-application period.
- 7.1.2 DCLG's Planning Act 2008: Guidance on the pre-application process (March 2015) recognises that technical expert input will often be needed in advance of formal compliance with the pre-application requirements. Early engagement with these bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process.
- 7.1.3 The Planning Inspectorate's Advice Note 14: Compiling the Consultation Report (April 2012) sets out that where applicants have engaged in non-statutory consultation, any consultation not carried out under the provisions of the Act should be clearly indicated and identified in the Consultation Report.
- 7.1.4 This Section outlines informal non-statutory engagement undertaken as part of the pre-application consultation process and has been kept separate from statutory consultation reporting in order to assist when it comes to determining compliance with pre-application statutory requirements.
- 7.1.5 Informal engagement comprises any engagement undertaken with consultees and stakeholders, on issues relating to the Project, that took place in the pre-application period but which was not undertaken as a requirement of the Planning Act 2008 (as amended).
- 7.1.6 Many of the views raised through informal engagement reflect those submitted through the formal consultation process by the same consultee. For further details on consultees formal consultation responses refer to the tables in Sections 4 and 6.

7.2 Informal engagement with councillors and the local community

- 7.2.1 Table 7.1 summarises informal engagement with councillors, community groups and other organisations.

Table 7.1: Informal engagement with councillors and community groups

Briefing to:	Date
Local Enfield councillors	3 November 2014
Enfield councillors and MPs	17 November 2014
Royal Town Planning Institute	24 February 2015
Winchmore Hill Area Ward Forum	3 March 2015
Residents of Angel Community Together (REACT)	14 April 2015
Edmonton Green, Haselbury, Upper Edmonton Area Ward Forum	23 April 2015

7.2.2 Additionally the Highams Park Planning Group undertook a tour of the Edmonton EcoPark on 25 February 2015.

7.2.3 Articles about the Project were published on 4 February 2015 in the following publications:

- a. The Enfield Independent;
- b. This is Local London; and
- c. Waste Management World.

7.3 Informal engagement with statutory consultees

The Planning Inspectorate Round Table Meeting

7.3.1 The Planning Inspectorate held a Round Table Meeting at the Edmonton EcoPark on 10 June 2015 to discuss procedural matters and any issues stakeholders might have regarding the Project. The meeting was followed by a tour of the Edmonton EcoPark.

7.3.2 The Round Table Meeting was attended by the following statutory consultees:

- a. LB Enfield;
- b. LB Haringey;
- c. City of London Corporation in respect of their role as Conservator of Epping Forest;
- d. Environment Agency (EA);
- e. Lee Valley Regional Parks Authority; and
- f. Greater London Authority.

7.3.3 The Planning Inspectorate gave a presentation on procedural matters and the Applicant gave a presentation providing an overview of the Project. The presentations were followed with an open discuss on any matters raised by attendees. The following matters were discussed: Statements of Common Ground, waste use, design, water use, air quality, Lee Valley Heat Network, the relationship between planning and permitting, Habitats Regulations and transport and traffic.

- 7.3.4 Minutes of the Round Table Meeting are available on the Planning Inspectorate website at the following link and a copy is contained in Appendix G1:

<http://infrastructure.planninginspectorate.gov.uk/projects/london/north-london-heat-and-power-project/?ipcSection=docs>

LB Enfield

- 7.3.5 As the local authority within which the Project is located and a prescribed statutory consultee under section 42 of the Planning Act 2008 (as amended) a close working relationship has been established with LB Enfield. The council already has an in-depth knowledge of the Application Site and produced the Edmonton EcoPark Supplementary Planning Document (SPD) (May 2013) setting out their ambitions and requirements for the future of the Edmonton EcoPark. As the local planning authority, LB Enfield has also been responsible for determining previous applications for developments within the Application Site. As a result, LB Enfield has played an important role in commentating on the Project.
- 7.3.6 Engagement on the Project with LB Enfield began as early as possible to ensure impacts were understood and considered before submission of the Application. Engagement commenced in August 2014 with an initial briefing to introduce the Project. Following this, regular meetings/conference calls were held, approximately every three weeks, through to submission of the Application.
- 7.3.7 Meetings were typically held with key officers from LB Enfield's Development Management Team, and were expanded from time to time to include transport, policy, urban design, sustainability and environmental health officers as appropriate.
- 7.3.8 Key topics of discussion between the Applicant and LB Enfield included:
- a. detailed design for the proposal, including site layout, materials, stack heights and lighting;
 - b. the approach to consultation and engagement;
 - c. local impacts of proposed development;
 - d. the post submission and detailed design process;
 - e. the Draft DCO including Requirements;
 - f. proposed Planning Performance Agreement; and
 - g. the Draft Section 106 Agreement.
- 7.3.9 LB Enfield also provided formal feedback on the Draft SoCC, and to Phase One and Phase Two Consultations as described in Sections 3 to 6.
- 7.3.10 LB Enfield were also engaged in a different capacity, as promoter of the LVHN. Commercial negotiations in respect of connection to the LVHN have taken place throughout the development of the Project.

Environment Agency

- 7.3.11 The Environment Agency (EA) has two key roles in the DCO process, as a regulator and as a statutory consultee under section 42 of the Planning Act 2008 (as amended).
- 7.3.12 The Applicant engaged with the EA in its role as regulator on the Environmental Permit required under the Environmental Permitting Regulations 2010 for the operation of the Project. The purpose of this engagement has been to agree the scope of the Permit and its programme.
- 7.3.13 The Applicant has also engaged with the EA in their capacity as a statutory consultee throughout the development of the Project. A total of six meetings were held between March 2014 and the submission of the Application. One of the meetings was held at the EcoPark and included a site tour.
- 7.3.14 Meetings covered a range of topic areas, including but not limited to:
- a. scope of baseline studies and technical assessments;
 - b. EIA methodology;
 - c. cooling options and water abstraction;
 - d. anaerobic digestion on-site;
 - e. air quality, including NO_x and particulates;
 - f. decommissioning and demolition;
 - g. land contamination;
 - h. ground water;
 - i. flood risk assessment; and
 - j. hydrology, drainage and water quality.
- 7.3.15 In addition correspondence was maintained between the Applicant and the EA throughout the pre-application period. A number of technical background documents prepared to inform the development of the Project were sent to the EA for review and comment, these covered hydrological risk, bunker capacity, geotechnical design, air quality modelling of technology options and the EIA Scoping Report (contained in Vol 1 Appendix 1.1 of the ES (AD06.02)). The EA also provided guidance on a number of technical areas, including flood risk and green roof provision.
- 7.3.16 In its role as a statutory consultee, the EA, provided feedback to Phase One and Phase Two Consultations as described in Sections 3 to 6.

Transport for London

- 7.3.17 As a prescribed statutory consultee under section 42 of the Planning Act 2008 (as amended), the Applicant has conducted on-going engagement with Transport for London (TfL) on the Project.
- 7.3.18 Regular meetings were held between July 2014 and submission of the Application. The meetings provided an opportunity to discuss the Project, with a particular focus on trip generation, the proposed Construction and

Operation Travel Plans (contained in Appendices K and J of the Transport Assessment (TA) (AD05.11), and options for water transport.

- 7.3.19 Correspondence was maintained between the Applicant and TfL throughout the pre-application period. TfL also provided comments on the Transport Assessment Scoping Report (contained in Appendix A of the TA (AD05.11)).
- 7.3.20 TfL provided feedback to Phase One and Phase Two Consultations as described in Sections 4 and 6. In addition TfL provided a formal pre-application advice letter, following the formal pre-application meeting held on 10 November 2014 (meeting minutes and a copy of the letter can be found in Appendix B of the TA (AD05.11)). The letter is set out TfL's views on initial proposals and set out recommendations and expectations for the Application. These included: a Transport Assessment which includes measures to reduce the impact of traffic on the wider network and consider approaches to reduce car dependency; a construction impact summary; a Construction Logistics Plan which includes site access arrangements, booking systems, phasing, vehicular route and scope for modal shift to water use; and a travel plan, including cycle safety training for HGV drivers where it can be promoted.

Greater London Authority

- 7.3.21 As a prescribed statutory consultee under section 42 of the Planning Act 2008 (as amended), the Applicant has conducted on-going engagement with the Greater London Authority (GLA) on the Project.
- 7.3.22 Four meetings were held with the GLA held between March 2014 and August 2015. These covered a range of topics including the provision of heat, climate change mitigation, design, flood risk, air quality, noise and transport.
- 7.3.23 The GLA also provided a response to Phase One and Phase Two Consultations as described in Sections 3 to 6.

Lee Valley Regional Park Authority

- 7.3.24 The Applicant has conducted on-going engagement with Lee Valley Regional Park Authority (LVRPA) on the Project who are a Land Interest under section 44 of the Planning Act (as amended).
- 7.3.25 A total of seven meetings were held between July 2014 and submission of the Application covering a range of topics with a particular focus on the consultation process, the use of Lee Park Way, landscaping particularly along the eastern edge of the Edmonton EcoPark, the Temporary Laydown Area, transport including the potential for water transport, security and the future if the existing EfW facility plot once it is removed. The meeting held in August 2015 took place on-site to discuss landscaping in more detail.
- 7.3.26 The Applicant has separately engaged with LVRPA in their capacity as landowner.
- 7.3.27 The LVRPA also provided responses to Phase One and Phase Two Consultation as described in Section 3 to 6.

Natural England

- 7.3.28 As a prescribed statutory consultee under section 42 of the Planning Act 2008 (as amended), the Applicant has conducted on-going engagement with Natural England on the Project.
- 7.3.29 One meeting was held in June 2014 covering the initial proposals, approach to consultation and engagement, and scope for the ecological assessment for the EIA and Habitats Regulations Assessment (HRA).
- 7.3.30 Subsequently Natural England provided written advice on the approach to undertaking the HRA.
- 7.3.31 Natural England also provided responses to Phase One and Phase Two Consultation as described in Sections 3 to 6.

LondonWaste Limited

- 7.3.32 Throughout the period of preparation of the Project, the Applicant has engaged with LondonWaste Limited., in particular ensuring that representatives of the company took part in meetings considering the masterplanning of the Edmonton EcoPark, and the technical development of the design, and providing regular briefings and opportunities for the company to provide comments on the proposals as they developed.

Canal and River Trust

- 7.3.33 As a prescribed statutory consultee under section 42 of the Planning Act 2008 (as amended), the Applicant has conducted on-going engagement with Canal and River Trust (C&RT) on the Project. Two meetings were held between March and May 2016 and correspondence was exchanged in the meantime.
- 7.3.34 Discussions covered the general design approach, landscaping of the River Lee Navigation towpath, retention of the Edmonton Sea Cadets at the Edmonton EcoPark, the Flood Risk Assessment and the movement of materials by water.
- 7.3.35 C&RT were also formally consulted as part of Phase One and Phase Two Consultations, and provided a response to Phase Two Consultation as described in Section 6.

UK Power Networks

- 7.3.36 As a prescribed statutory consultee under section 42 of the Planning Act 2008 (as amended), the Applicant has conducted on-going engagement with UK Power Networks (UKPN). UKPN is the relevant Distribution Network Operator (DNO) pursuant to an electricity distribution licence issued in accordance with the provisions of the Electricity Act 1989 as amended by the Utilities Act 2000 and will be endeavour to deliver the upgrade works required for the grid connection under their Statutory Undertaker Rights.
- 7.3.37 The Applicant met with UKPN on four occasions between June 2014 and February 2015 and exchanged correspondence in the meantime.

Discussions focused on the grid connection upgrade works and the cost of works and provision of facilities.

- 7.3.38 UKPN were also formally as part of Phase One and Phase Two Consultations, however no formal response was submitted to either Phase.

Sustrans

- 7.3.39 Sustrans manage National Cycle Network (NCN) Route 1 which runs along Lee Park Way and therefore part of NCN Route 1 falls within the Application Site. The Applicant met with Sustrans on 26 March 2015 to discuss the proposed approach to improving NCN Route 1. The proposed improvements to NCN Route 1 were agreed.

8 Conclusion

8.1 Consultation process

- 8.1.1 This report has outlined the consultation undertaken by the Applicant prior to the submission of the Application. The Applicant has consulted widely about the Project. This has comprised both formal consultation and informal engagement with stakeholders, the local community and other interested parties.
- 8.1.2 Pre-application consultation is a legal requirement for NSIPs and formal consultation has been undertaken in accordance with the requirements of the Planning Act 2008 (as amended).
- 8.1.3 Local community consultation was carried out in accordance with the SoCC under section 47 of the Planning Act 2008 (as amended).
- 8.1.4 The pre-application consultation process took place in two phases. Phase One Consultation ran for a period of 61 days from 28 November 2014 to 27 January 2015. This gave consultees an early opportunity to comment on the initial proposals for the Project. A total of 72 responses were submitted and the Project as generally well received.
- 8.1.5 Phase Two Consultation ran for a period of 44 days, between 18 May and 30 June 2015. This phase of consultation provided more detail on proposals, including an indication of what the Edmonton EcoPark could look like, landscaping, preliminary environmental information, the cooling system, transport, management of construction, access proposals and the visitors centre. A total of 123 responses were received during Phase Two Consultation from 116 respondents, and again, the Project was generally well received.
- 8.1.6 A variety of methods were used to engage people during both phases of consultation, as follows:
- a. public exhibitions;
 - b. written information;
 - c. advertisements;
 - d. letters and newsletters;
 - e. community briefings; and
 - f. a Project website and telephone line.
- 8.1.7 In addition to the formal stages of consultation the Applicant has undertaken informal engagement throughout the development of Project as set out in Section 7.

8.2 Project development

- 8.2.1 This report summarises all comments received during formal consultation, and the Project's response to them. All comments were carefully considered and taken into account in developing the proposals.

8.2.2 A number of changes to the Project were made in response to comments made at Phase One Consultation. These include:

- a. respondents generally felt that the overall visual impact of the ERF should be reduced as far as possible, in response the Applicant progressed with the minimum outline design which seeks to minimise the scale and massing of the ERF;
- b. there was generally equal support for a single chimney flue and two flues. However, greater support was expressed for a design which was as visually unobtrusive as possible. This informed the decision to select a single stack;
- c. respondents noted that incorporating ecological measures into the design was important and that the Project should integrate with the surrounding environment, in particular the Lee Valley Regional Park. This has been achieved by enhancing habitats along the eastern edge, as well as green and brown roofs;
- d. some respondents indicated a preference for air cooling technology, whilst others had a preference for water cooling. As such the Applicant undertook further consultation on the cooling technology during Phase Two Consultation;
- e. there was general support for EcoPark House, and the proposal to retain the Edmonton Sea Cadets on-site. These elements of the Project were therefore progressed further;
- f. in response to comments raised on the safety of pedestrians and cyclists, new pedestrian and cycle facilities were incorporated into the proposals along Lee Park Way; and
- g. some of the comments requested more detailed information, for example on the proposed design, potential environmental effects and how they will be managed, waste forecasting and traffic impacts. This information was provided during Phase Two Consultation.

Phase Two Consultation

8.2.3 Changes were also made to the Project as a result of comments made during Phase Two Consultation, as summarised below:

- a. EcoPark House was reduced from three storeys to two storeys in response to comments that the top storey of the building was unnecessary and ill-fitting with the surrounding context;
- b. some respondents considered the viewing platform on the ERF to be too large and overly dominant. In response the scale of the viewing platform was reduced and it was relocated to the southern edge of the ERF to maximise views;
- c. some respondents suggested that renewable energy, in the form of solar panels or wind turbines, should be incorporated. It is not feasible to incorporate wind turbines on the Edmonton EcoPark (refer to the Building Energy Assessment, appended to the Sustainability Statement (AD.05.13) for further information). However, in response the Project

includes provision for solar panels on the roof of the ERF and RRF subject to cost benefit analysis; and

- d. comments were, on balance, in favour of avoiding the plume because of its visual impact and the potential for considering it to be smoke. In response the Applicant is proposing air cooling condensers which would not generate a plume.



Series 05 Technical Documents

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