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NORTH LONDON WASTE AUTHORITY  
NORTH LONDON HEAT AND POWER  
PROJECT

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PLANNING STATEMENT

The Planning Act 2008 The Infrastructure  
Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009  
Regulation 5 (2) (q)

AD05 . 02

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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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## Glossary

Refer to Project Glossary (AD01.05)

## Executive summary

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### Purpose of this report

- i.i.i This Planning Statement has been prepared to support North London Waste Authority's (the Applicant's) application (the Application) for a Development Consent Order (DCO) made pursuant to 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<sub>e</sub>) at the Edmonton EcoPark in north London with associated development, including a Resource Recovery Facility (RRF). The proposed ERF will replace the existing Energy from Waste (EfW) facility at the Edmonton EcoPark.
- i.i.iii The Planning Statement considers the planning issues surrounding the Application. It sets out the planning policy context for the Project, and addresses the issues raised in the light of relevant National Policy Statements (NPS), as well as relevant policies set out by the Mayor of London and the London Borough (LB) of Enfield.

### Application Site

- i.i.iv 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.i.v The Application Site includes all land required to deliver the Project. This includes land that would be required temporarily to facilitate the development.
- i.i.vi 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.

## The Project

- i.i.vii 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.
- i.i.viii 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.
- i.i.ix 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.
- i.i.x 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).

## Planning history

- i.i.xi The existing EfW facility was commissioned in 1971, and has served the North London area for almost 45 years. Since then, the site has seen the development of a number of additional waste facilities, becoming the Edmonton EcoPark in the late 2000s.
- i.i.xii The Edmonton EcoPark has been subject to a number of operational planning applications in the past 15 years, including permissions granted for the creation of an in-vessel composting (IVC) facility and maturation area in 2004, and construction of a waste transfer station in 2005.

- i.i.xiii There are a number of extant planning permissions and major development proposals in the area surrounding Edmonton EcoPark, which have been taken into consideration in developing the Project. These are detailed in Section 3 of this Planning Statement.

### **Scheme development**

- i.i.xiv The proposed ERF will replace the existing EfW facility which is expected to reach the end of its operational life by around 2025.
- i.i.xv The strategic basis for the Applicant's decisions is the North London Joint Waste Management Strategy<sup>1</sup> which covers the period 2004 to 2020. This strategy contains objectives and targets which set out the need to reduce the amount of waste sent from the north London area to landfill, and targets for increasing recycling in the area to 50 per cent by 2020.
- i.i.xvi In order to determine the most appropriate way to meet the requirements for future residual waste management the Applicant undertook assessments relating to the site selection and technology solution to be pursued for future waste management in the north London area. The selection of thermal technology with advanced moving grate is supported by the technological assessments and is consistent with planning policy. The site selection was based on site availability and suitability.

### **Legislative and policy framework**

- i.i.xvii National Policy Statements (NPS) will be the primary consideration for the Secretary of State (SoS) in making their decision regarding this application. Overarching National Policy Statement for Energy (NPS EN-1) (DECC, 2011)<sup>2</sup> and National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (DECC, 2011)<sup>3</sup> set out the policy framework for the Application, outlining objectives which must be achieved and setting out principles against which the application will be assessed by the decision maker. These include: setting criteria for 'good design' for energy infrastructure, a requirement to include combined heat and power as part of the project, and a requirement to submit an Environmental Statement.
- i.i.xviii NPS EN-1 highlights a need for new energy generating facilities to replace planned closures and to accommodate growing demand for energy in the future.
- i.i.xix Other relevant national, regional and local policy is also considered including London-wide policies relating to energy and waste infrastructure, sub-regional policies emerging from the Draft North London Waste Plan<sup>4</sup>, and local policies set out in LB Enfield's Local Plan.

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<sup>1</sup> North London Waste Authority (2009) Joint Waste Management Strategy, February 2009.

<sup>2</sup> Department of Energy and Climate Change (2011) Overarching National Policy Statement for Energy (EN-1), July 2011.

<sup>3</sup> Department of Energy and Climate Change (2011) National Policy Statement for Renewable Energy Infrastructure (EN-3), July 2011,

<sup>4</sup> Draft North London Waste Plan (2015) Regulation 18, July 2015

## Planning assessment

- i.i.xx The Project is considered against the assessment principles set out in NPS EN-1 and other relevant policy in Section 6 of the Planning Statement. The following topics are discussed:
- a. energy and waste infrastructure;
  - b. water quality and resources;
  - c. flood risk;
  - d. air quality, odour and light;
  - e. noise and vibration;
  - f. biodiversity and geological conservation;
  - g. landscape and visual impacts;
  - h. historic environment;
  - i. Green Belt;
  - j. traffic and transport;
  - k. project waste management; and
  - l. socio-economic.
- i.i.xxii The planning assessment identifies that the Project would make an important contribution to meeting the Government's recognised need for a diverse and secure energy supply. Furthermore, the Project would deliver sustainable waste management infrastructure identified as necessary in national and regional planning policy.
- i.i.xxiii Principal works do not fall within Green Belt land, however some associated development, namely part of a new site access off the existing Lee Park Way (upgrading of an existing roadway), landscape enhancement works and the temporary Laydown Area are proposed in the Green Belt. It is considered that these works constitute 'very special circumstances' as described in NPS EN-1 and the National Planning Policy Framework (NPPF)<sup>5</sup> because there is overwhelming need for the Project and the benefits provided by the Project outweigh any impacts upon the Green Belt.
- i.i.xxiii In respect of all other topics the assessment sets out the measures taken to minimise and mitigate for any potential impact and does not identify any overriding reasons why consent should be refused.

## The overall planning balance

- i.i.xxiv In considering any proposed development, NPS EN-1 requires the SoS to weigh the potential impacts against the potential benefits. The Project would create the following benefits:
- a. make a significant contribution to meeting the urgent need for new energy infrastructure;

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<sup>5</sup> Department for Communities and Local Government (2012) National Planning Policy Framework, March 2012



- b. contribute to renewable energy generation;
  - c. contribute to tackling climate change;
  - d. provide a long-term solution for the management of north London's waste in accordance with the waste hierarchy;
  - e. create jobs during construction and operation;
  - f. make a contribution to providing low carbon heat, subject to being connected to a district heating network;
  - g. provide a new purpose built facility for the Edmonton Sea Cadets;
  - h. provide space to be used for community and educational purposes in EcoPark House;
  - i. provide a RRC for north London's residents and businesses;
  - j. improve the overall visual appearance of the Edmonton EcoPark;
  - k. improve the environment for pedestrians and cyclists along Lee Park Way;
  - l. create new habitats and enhance existing habitats, particularly along Lee Park Way;
  - m. improve peak drainage discharge rates from and mean a reduction in fluvial flood risk downstream;
  - n. the proposed ERF would achieve a nitrogen oxide emission level of less than half the permissible level;
  - o. achieve BREEAM 'very good' rating as a minimum;
  - p. rationalise the layout of the Edmonton EcoPark;
  - q. create a new site access and improved safety and security for users;
  - r. secure the demolition and decontamination of the existing EfW facility when it reaches the end of its operational life.
- i.i.xxv The Project would create a limited number of effects including temporary and minor works in the Green Belt and a temporary visual impact during construction and demolition. The Project includes minor works in the Lea Valley Site of Metropolitan Importance for Nature Conservation, including the clearing of scrub and creation of a footway. These works are more than offset by the creation of new habitat and enhancement of existing habitat elsewhere in the Application Site. The benefits of the Project therefore significantly outweigh the effects.
- i.i.xxvi The Project is in conformity with NPS EN-1 and NPS EN-3, and there are no significant conflicts with regional or local planning policy.
- i.i.xxvii The Project has been designed to reduce effects as far as practicable and all necessary mitigation is either incorporated into the design or the Draft DCO or the Draft Section 106 Agreement (AD03.03).
- i.i.xxviii The Planning Act 2008 (as amended) requires that the Application should be decided in accordance with NPS EN-1 and NPS EN-3, except where certain legal tests would be infringed or *"the adverse impacts of the project"*

*would outweigh its benefits*". The Project does not infringe any legal tests. The benefits of the Project, most notably the contribution to meeting the urgent national need for low carbon energy and the need for new waste infrastructure, clearly outweigh the small number of effects.

# 1 Introduction

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## 1.1 Purpose of this report

- 1.1.1 This Planning Statement has been prepared to support North London Waste Authority's (the Applicant's) application (the Application) for a Development Consent Order (DCO) made pursuant to the Planning Act 2008 (as amended).
- 1.1.2 The Application is for the North London Heat and Power Project (the Project) comprising the construction, operation and maintenance of an Energy Recovery Facility (ERF) capable of an electrical output of around 70 megawatts (MW<sub>e</sub>) at the Edmonton EcoPark in north London with associated development, including a Resource Recovery Facility (RRF). The proposed ERF will replace the existing Energy from Waste (EfW) facility at the Edmonton EcoPark.
- 1.1.3 This Planning Statement considers the planning issues surrounding the Application. It sets out the planning policy context for the Project, and addresses the issues raised in the light of relevant National Policy Statements (NPS), as well as relevant policies set out by the Mayor of London and the London Borough (LB) of Enfield. It is structured as follows:
- a. Section 1: introduces the Planning Statement in the context of the wider Project;
  - b. Section 2: provides a detailed description of the Application Site and the proposed Project, detailing principal and associated development as detailed in the Book of Plans, together with an overview of the proposed timescales for delivery and operational information;
  - c. Section 3: outlines the planning history of the Application Site, as well as providing details of surrounding planning context;
  - d. Section 4: sets out the details of scheme development, including a description of the need for development, and the potential for Combined Heat and Power (CHP) development from the proposed ERF;
  - e. Section 5: provides the legislative and planning policy context for the Application, including national, regional and local policy requirements;
  - f. Section 6: assesses the Application thematically against the relevant policy set out in Chapter 5, focussing primarily upon conformity with requirements set out in the relevant NPSs; and
  - g. Section 7: outlines the overall planning balance of benefits and adverse effects for the Application, and how this will be addressed through obligations and requirements.
- 1.1.4 This Planning Statement should be read alongside the other information that has been submitted with the Application, in accordance with the statutory requirements set out in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

## 1.2 The Applicant

- 1.2.1 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).
- 1.2.2 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.
- 1.2.3 LWL is a private waste management company wholly owned by the Applicant, and is the freeholder of the Edmonton EcoPark and the operator of the existing EfW facility. LWL has a current contract with the Applicant for management of its waste which expires in December 2025 with flexibility for termination sooner. The contract includes:
- a. the reception, treatment and disposal of residual wastes;
  - b. the operation of Reuse and Recycling Centres (RRC), including the recycling of wastes and the transfer of residual wastes to a disposal point;
  - c. the reception and treatment of separately collected organic wastes;
  - d. the reception and transportation of other separately collected wastes for recycling by third parties; and
  - e. the reception and transportation of other separately collected clinical and offensive wastes for treatment by third parties.

## 1.3 EfW and ERF terminology

- 1.3.1 The Project proposes replacing the existing EfW facility at the Edmonton EcoPark with an ERF. Much of the policy set out in the following sections refers to 'EfW' as opposed to 'ERF'.
- 1.3.2 ERFs are more efficient in producing energy using residual waste as fuel than EfWs. The proposed ERF will surpass the requirement under the Waste Framework Directive (Directive 2008/98/EC) to achieve an efficiency rating in excess of the prescribed level, and will therefore be classified as a recovery operation rather than disposal. Hence the proposed facility is described as an 'ERF'.
- 1.3.3 However for the purposes of reviewing the Project against the planning policy context 'EfW' and 'ERF' can be considered the same.

## 1.4 Application documents and plans

- 1.4.1 Table 1.1 sets out the documents and plans submitted as part of this Application. The documents submitted meet the requirements set out in Regulation 5 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

1.4.2 This document draws on the conclusions of many of the Application documents listed in Table 1.1, and interprets them against relevant planning policy considerations.

Table 1.1: List of Application Documents<sup>6</sup>

Development Consent Order Application submission documents			
Series	Reference code	Document title	Description
Application documents	AD01.01	Cover Letter	Covering letter submitted with the Application
	AD01.02	Navigation Document	A guide to the documents included in the Application
	AD01.03	Application Form	Completed DCO application form
	AD01.04	Copies of Newspaper Notices	Copies of newspaper notices publicising the Application
	AD01.05	NLHPP Glossary and Acronyms	Provides explanations of any technical terminology and acronymns used in the reports and documents
	AD01.06	Red Line Boundary Shape File	A digital file showing the boundary of the DCO order limits
Plans and drawings	AD02.01	Book of Plans (see Table 1.2)	The drawings that have been prepared for the Application comprising site location plans, land plans, works plans and other plans required by regulations
	AD02.02	Design Code Principles	A combined document that includes the design code principles and supporting plans.
Draft Development Consent Order	AD03.01	Draft Development Consent Order	Contains the legal powers being applied for as part of the Application, in order to construct, operate and maintain the project
	AD03.02	Explanatory Memorandum	Describes the purpose and effect of each provision of the Draft DCO
	AD03.03	Section S106 Draft Agreement	Sets out the proposed planning obligations

<sup>6</sup> The series of application document corresponds to those outlined in Appendix 1 of the Planning Inspectorate's Advice Note Six: Preparation and Submission of Application Documents.

<b>Development Consent Order Application submission documents</b>			
<b>Series</b>	<b>Reference code</b>	<b>Document title</b>	<b>Description</b>
	AD03.04	Statements of Common Ground(s)	Contains joint statements from the Applicant and stakeholders agreeing factual information within the Application and outlining matters on which they agree, or where agreement has not been reached
Compulsory purchase information	AD04.01	CPO Statement of Reasons	Explains the reasons why powers of compulsory acquisition are necessary to implement the Project, and presents the case for why it is in the public interest to grant those powers
	AD04.02	Funding Statement	Explains how the Project would be funded, including the compulsory acquisition of land
	AD04.03	Book of Reference	Contains all land referencing information for land proposed to be used or acquired for the Project
	AD04.04	CPO Powers Roadmap	Is provided for information and sets out what CPO powers will be used in relation to each land plot shown on the land plans
Technical reports	AD05.01	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
	AD05.02	Planning Statement	Sets out the planning policy context for the Project, and addresses the issues raised in the light of relevant National Policy Statements, as well as relevant policies set out by the Mayor of London and the London Borough of Enfield.
	AD05.03	Alternatives Assessment Report	Summarises the alternatives that have been considered by the Applicant, in particular the technology and site options, to determine the most appropriate scheme.
	AD05.04	Need Assessment	Explains why the Project is proposed, by considering it in

Development Consent Order Application submission documents			
Series	Reference code	Document title	Description
			the context of national, strategic and local factors
	AD05.05	Fuel Management Assessment	Sets out how waste received at the Edmonton EcoPark will be managed
	AD05.06	Combined Heat and Power Development Strategy	Describes the CHP development strategy for the proposed Energy Recovery Facility, demonstrating the CHP opportunity and how it is planned to be implemented.
	AD05.07	Design & Access Statement	Outlines the design concepts and principles, and the alternatives considered, along with accessibility for the Project
	AD05.08	Grid Connection Statement	Demonstrates the feasibility and proposed approach to grid connection upgrade works to support the proposed electrical export capacity, while maintaining necessary levels of connection resilience
	AD05.09	Health Impact Assessment	Assesses the potential health impacts resulting from the Project
	AD05.10	Utility Strategy	Explains how the Project will connect to existing utility infrastructure systems, and outlines its impacts upon these systems
	AD05.11	Transport Assessment	Sets out the implications of the Project on transport, during construction and operation and provides framework travel plans
	AD05.12	Code of Construction Practice	Sets out the principles and controls developed to reduce and mitigate the effects of the Project during construction
	AD05.13	Sustainability Statement	Outlines and appraises the sustainability objectives for the design and construction of the Project, and how they would be achieved
	AD05.14	Flood Assessment Risk	Assesses the risk of flooding to the Application Site, the possible effect of the Project on flood risk elsewhere, and considers measures for

<b>Development Consent Order Application submission documents</b>			
<b>Series</b>	<b>Reference code</b>	<b>Document title</b>	<b>Description</b>
			reducing and/or mitigating these effects
	AD05.15	Statement on Potential Statutory Nuisances and Mitigation Measures	States whether the Project engages one or more of the matters set out in Section 79(1) of the Environmental Protection Act 1990(b)
	AD05.16	Report on Natural Features	Provides an assessment of any effects on natural features
	AD05.17	No Significant Effects Report	Sets out the recommendations from the Habitat Regulations Assessment screening report, confirming that there are no significant effects on protected habitats
Environmental Statement	AD06.01	ES Non Technical Summary	Provides a non-technical summary of the Environmental Statement
	AD06.02	Environmental Statement	Sets out the assessment of the likely significant effects of the Project on the environment
	AD06.03	Environmental Commitments and Mitigation Schedule	Sets out the environmental commitments and mitigation that the Applicant commits to delivering as part of the Project



Table 1.2: List of Application Plans

<b>Development Consent Order Application Submission Plans</b>			
<b>Category</b>	<b>Reference code</b>	<b>Plan title</b>	<b>Description</b>
Site location plans	A_0001	Application Site Location Plan – North London Context	Illustrates the location of the Application Site at a scale of 1:10,000
	A_0002	Site Location Plan 0 – Local Context	Illustrates the location of the Application Site at a scale of 1:2,000
	A_0003	Existing Edmonton EcoPark Site	Illustrates the parts of the Application Site which are outside the existing Edmonton EcoPark
	A_0004	Future Operational Edmonton EcoPark	Illustrates the boundary of the future operational site
Land plans	B_0001	Land Plan – Key Plan	Shows the location of compulsory acquisition powers sought
	B_0002	Land Plan – Land Required for, or affected by, the proposed development	Shows the land required for, or affected by, the proposed development
	B_0003	Land Plan – Land over which it is proposed to exercise powers of compulsory acquisition	Shows the land over which it is proposed to exercise powers of compulsory acquisition
	B_0004	Land Plan – Land in relation to which it is proposed to extinguish rights and to compulsorily acquire rights	Shows the land in relation to which it is proposed to extinguish rights and to compulsorily acquire rights
	B_0005	Land Plan – Land over which it is proposed to exercise any right to possess and use that land	Shows land over which it is proposed to exercise any right to possess and use that land
	B_0006	Land Plan – Special Category Land	Shows special category land
Works plans	C_0001	Works Plan - Key Plan	Shows the overall site layout and location of each of the works
	C_0001a	Works Plan – Key Plan – Split by Works	Show the location of each of the works separated into separate views
	C_0002	Works Plan - Works 1a and 1b: ERF and	Shows the works limits, limits of deviation and

<b>Development Consent Order Application Submission Plans</b>			
<b>Category</b>	<b>Reference code</b>	<b>Plan title</b>	<b>Description</b>
		Associated Development	buildings/structures for the ERF and ERF associated development
	C_0003	Works Plan – Section - Works 1a: ERF Building Structure Envelope	Provides elevations for the ERF
	C_0004	Works Plan - Works 2: RRF	Shows the works limits, limits of deviation and buildings/structures for the RRF
	C_0005	Works Plan – Section – Work 2: RRF building structure envelope	Provides elevations for the RRF
	C_0006	Works Plan – Works 3: EcoPark House	Shows the works limits, limits of deviation and buildings/structures for EcoPark House
	C_0007	Works Plan –Section – Work 3: EcoPark House Building Structure Envelope	Provides elevations for EcoPark House
	C_0008	Works Plan - Works 4: Utilities and Infrastructure work, landscaping, access, security, lighting and weighbridges	Shows the works limits and limits of deviation for access, landscape, lighting, security, weighbridges and utilities
	C_0009	Works Plan - Works 5: Temporary Laydown Area	Shows the works limits, limits of deviation and access points for the temporary Laydown Area
	C_0010	Works Plan Works 6: Site Preparation and Demolition	Shows the works limits and limits of deviation for site preparation and demolition
	C_0011	Works Plan - Works 7: Decommissioning and Demolition of Existing EfW Facility	Shows the works limits and limits of deviation for the decommissioning and demolition of the existing EfW facility
Other plans required by APFP Regulations 2009	C_0012	New or altered means of access, diversions, extinguishments and creation of rights of way	Plan submitted in accordance with the requirements of Regulation 5(2)(k)
	C_0013	New or altered means of access, diversions,	Plan submitted in accordance with the requirements of Regulation 5(2)(k)

Development Consent Order Application Submission Plans			
Category	Reference code	Plan title	Description
		extinguishments and creation of rights of way - Deephams Farm Road and Advent Way	
	C_0014	New or altered means of access, diversions, extinguishments and creation of rights of way - Lee Park Way	Plan submitted in accordance with the requirements of Regulation 5(2)(k)
	C_0015	Environmental features plan	Plan submitted in accordance with the requirements of 5(2)(l)
	C_0016	Water bodies in a River Basin Management plan	Plan submitted in accordance with the requirements of 5(2)(l)
	C_0017	Historic environment plan	Plan submitted in accordance with the requirements of 5(2)(m)
	C_0018	Land referred to in Article 28(1)(b) of the DCO	Plan showing land adjacent to the eastern side of Deephams Farm Road over which the Applicant needs rights for maintenance

Table 1.3: List of Indicative Application Plans in the Design Code Principles

Development Consent Order Application Submission Plans			
Category	Reference code	Plan title	Description
Indicative and for information plans	D_0001	Indicative layout of ERF and associated development	Shows the layout for the ERF and associated development
	D_0002	Indicative ERF External ramps	Shows the layout and elevations for the ERF ramps
	D_0003	Indicative layout of RRF	Shows the layout for the RRF
	D_0004	Indicative layout of EcoPark House	Showa the layout for EcoPark House
	D_0005	Indicative utilities	Shows the power, gas, water, sewer and water utility works
	D_0006	Indicative drainage	Shows the drainage zones
	D_0007	Indicative soft and hard landscape works	Shows the location of green roofs, brown roofs, and hard and soft landscaping
	D_0008	Indicative soft landscaping types	Shows the location of habitat creation and enhancement,

Development Consent Order Application Submission Plans			
Category	Reference code	Plan title	Description
			meadow, marginal planting and ornamental planting
	D_0009	Indicative cut and fill	Shows a plan of excavation and fill works
	D_0010	Indicative access and circulation	Shows footpaths, access and highways, weighbridges, bridges and parking
	D_0011	Indicative security and lighting	Shows lighting/CCTV, gatehouses and fences
	D_0012	Indicative Temporary Laydown Area	Shows the proposed layout of the Temporary Laydown Area
	D_0013	Indicative safeguarded heat pipe route	Shows the proposed routes safeguarded for heat pipes
	E_0001	Existing Application Site plan	Shows the existing layout of the Application Site
	E_0002	Illustrative Application Site proposed master plan	Provides an illustration of the proposed layout of the Application Site in Stage 4
	E_0003	Illustrative Project staging	Shows the location of demolition, construction and clearance works for each of the Project stages
	E_0004	Site section A: existing and indicative proposed	Shows existing and proposed elevations for Section A
	E_0005	Site section B: existing and indicative proposed	Shows existing and proposed elevations for Section B
	E_0006	Site section C: existing and indicative proposed	Shows existing and proposed elevations for Section C
	E_0007	Existing site topography	Shows the existing levels across the Application Site
	E_0008	Site topography proposed	Shows the proposed site topography

## 1.5 Other required consents

1.5.1 In addition to the powers sought by the Draft DCO several 'other consents and licences' will be required to construct, operate and maintain the Project.

1.5.2 The process of obtaining some of the other consents is already underway. The most notable example is the Environmental Permit which is required from the Environment Agency (EA) for the operation of the waste facility under the Environmental Permitting (England and Wales) Regulations 2010. The existing EfW facility at the Edmonton EcoPark is subject to an

Environmental Permit issued by the EA. The Applicant is in discussions with the EA regarding an application for the new Environmental Permit(s) associated with the Project. These permitting discussions have been aligned with the DCO process to ensure that consistent requirements are agreed to satisfy both processes (e.g. operational plant noise criteria).

- 1.5.3 For the other required consents and licences the level of detail required to secure these is not currently available. These consents and licences will therefore be obtained during the detailed design stage as required.

## 2 Site and project description

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### 2.1 Application Site

2.1.1 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.

2.1.2 The Application Site includes all land required to deliver the Project. This includes land that would be required temporarily to facilitate the development.

2.1.3 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**

2.1.4 The Edmonton EcoPark is an existing waste management complex of around 16 hectares.

2.1.5 Current use of the Edmonton EcoPark comprises:

- a. an EfW facility which treats circa 540,000 tonnes per annum (tpa) of residual waste and generates around 40MW<sub>e</sub> (gross) of electricity;
- b. an In-Vessel Composting (IVC) facility which processes food, landscaping and other green waste from kerbside collections and Reuse and Recycling Centres (RRCs) as well as local parks departments. The facility currently manages around 30,000tpa, and has a permitted capacity of 45,000tpa;
- c. a Bulky Waste Recycling Facility (BWRF) and Fuel Preparation Plant (FPP) which receive bulky waste from RRCs and direct deliveries. These facilities respectively recycle wood, metal, plastic, paper, card and construction waste; and separate oversized items and shred waste suitable for combustion. These integrated facilities manage over 200,000tpa;

- d. an Incinerator Bottom Ash (IBA) Recycling Facility which processes ash from the existing EfW facility;
- e. a fleet management and maintenance facility which provides parking and maintenance facilities for the Edmonton EcoPark fleet of operational vehicles;
- f. associated offices, car parking and plant required to operate the facility; and
- g. a former wharf and single storey building utilised by the Edmonton Sea Cadets under a lease.

2.1.6 In order to construct the proposed ERF, the existing BWRP 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**

2.1.7 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.

2.1.8 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**

2.1.9 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.

## **2.2 Surrounding area**

2.2.1 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.

2.2.2 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.

2.2.3 Eley Industrial Estate located to the west of the Application Site comprises a mixture of retail, industrial and warehouse units.

- 2.2.4 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.
- 2.2.5 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 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.
- 2.2.6 A more detailed assessment of the planning context in the surrounding area, including planned new development, is included in Chapter 3 of this Report.

## 2.3 The Project

- 2.3.1 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.
- 2.3.2 The main features of the Project once the proposed ERF and permanent associated works are constructed and the existing EfW facility is demolished 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 access points to the Edmonton EcoPark.
- 2.3.3 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.

2.3.4 There are some aspects of the Project design that require flexibility and have therefore yet to be fixed, for example, the precise location and scale of the buildings associated with the Project. It would not be possible to fix these elements in advance of the detailed design and construction which would be undertaken following appointment of a contractor should the DCO be granted. In order to accommodate this and ensure a robust assessment of the likely significant environmental effects of the Project, the Application is based on the limits of deviation set out in the Book of Plans (AD02.01), which identifies:

- a. works zones for each work or group of works (to establish the area in which the development can be located); and
- b. maximum building envelopes (to establish the maximum building length, width, height and footprint).

2.3.5 The Book of Plans (AD02.01) is 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).

2.3.6 A separate Environmental Permit would need to be obtained from the Environment Agency (EA) for the operation of the waste facility under the Environmental Permitting (England and Wales) Regulations 2010. The existing EfW facility at the Edmonton EcoPark is subject to an Environmental Permit issued by the EA. The Applicant is currently in discussions with the EA regarding an application for the new Environmental Permit(s) associated with the proposed ERF with a view to submitting an application in parallel with the DCO process.

#### **Principal development (Works No.1a)**

2.3.7 The principal development comprises the construction of an ERF located at the Edmonton EcoPark, fuelled by residual waste and capable of an electrical output of around 70MW<sub>e</sub> (gross) of electricity. The principal development consists of the following development, located within the limits of deviation shown on Drawing C\_0002 and within the building envelopes shown on Drawing C\_0003 (in the Book of Plans (AD02.01)):

- (i) a main building housing:
  - (a) a tipping hall;
  - (b) waste bunker and waste handling equipment;
  - (c) two process lines (with each line having a capacity of 350,000 tonnes of waste per annum), consisting of a moving grate, furnace, boiler and a flue gas treatment plant;
  - (d) facilities for the recovery of incinerator bottom ash and air pollution control residue;
  - (e) steam turbine(s) for electricity generation including equipment for heat off-take; and

- (f) control room containing the operational and environmental control and monitoring systems, and offices.
- (ii) entry and exit ramps to the ERF;
- (iii) a stack containing flues for flue gas exhaust;
- (iv) cooling equipment; and
- (v) an observation platform enclosure.

#### **Associated development (Works No. 1b – 7)**

2.3.8 Associated development within the meaning of section 115(2) of the Planning 2008 Act (as amended) in connection with the Nationally Significant Infrastructure Project referred to in Works No.1a, comprising:

- (a) Works No.1b – works required to provide buildings, structures, plant and equipment needed for the operation of the ERF as shown on Drawing C\_0002 (AD02.01) comprising:
  - (i) a wastewater treatment facility;
  - (ii) a water pre-treatment plant;
  - (iii) external stores and workshops;
  - (iv) a fuelling area and fuel storage, vehicle wash, transport offices and staff facilities, toilets, natural gas intake and management compound, and fire control water tank(s); and
  - (v) electrical substation(s).
- (b) Works No.2 – the construction of a resource recovery facility comprising the following building, structures and plant, as shown on Drawing C\_0004 and within the building envelope shown on Drawing C\_0005 (AD02.01):
  - (i) a Recycling and Fuel Preparation Facility (RFPF);
  - (ii) a RRC;
  - (iii) offices, and staff and visitor welfare facilities;
  - (iv) odour abatement and dust suppression plant and equipment; and
  - (v) fire control water tank(s) and pump house and equipment.
- (c) Works No.3 – the construction of a building to provide visitor, community and education facilities, office accommodation, and a boat canopy, as shown on Drawing C\_0006 and within the building envelope shown on Drawing C\_0007 (AD02.01).
- (d) Works No.4 – utilities and infrastructure work, landscaping, access, security and lighting, and weighbridges, as shown on Drawing C\_0008 (AD02.01), comprising:
  - (i) With regard to the following
    - (a) potable water;
    - (b) waste water;
    - (c) surface water;

- (d) foul water;
- (e) raw water;
- (f) electricity;
- (g) gas; and
- (h) CCTV, telecoms and data,

works could include:

- the diversion, repositioning, decommissioning, removal, replacement, modification or upgrading of existing pipes, cables, systems and associated apparatus;
  - the laying or installation of new pipes, cables, systems and associated apparatus; and
  - the creation of connections to existing or new pipes, cables, systems and associated apparatus.
- (ii) the erection of a raw water pumping station;
  - (iii) stabilisation works to the eastern bank of Salmon's Brook;
  - (iv) the construction of surface water pumps, pipework and attenuation tanks;
  - (v) landscaping works;
  - (vi) the installation of areas of green roof and/or brown roof;
  - (vii) the widening of the existing entrance into the Edmonton EcoPark from Advent Way, including modification or replacement of the bridge over Enfield Ditch;
  - (viii) construction within the Edmonton EcoPark of vehicle and cycle parking, vehicle, cycle and pedestrian routes, and weighbridges;
  - (ix) construction of an access into the Edmonton EcoPark from Lee Park Way, including bridging over Enfield Ditch;
  - (x) improvements to Lee Park Way including vehicle barriers and the creation of segregated pedestrian and cycle paths;
  - (xi) improvements to Deephams Farm Road and use of Deephams Farm Road as an access to the Edmonton EcoPark;
  - (xii) the resurfacing of Ardra Road (if required);
  - (xiii) security, fencing, and lighting works and equipment;
  - (xiv) the erection of security facilities and equipment and gatehouses within the operational site at access points from Advent Way, Ardra Road, and Lee Park Way;
  - (xv) the upgrade and maintenance of the existing bridge over the River Lee Navigation; and
  - (xvi) the installation of photovoltaic panels at roof level of the ERF and RRF.
- (e) Works No.5 – works for the creation of the Temporary Laydown Area and its temporary use, as shown on Drawing C\_0009 (AD02.01), as follows:

- (i) areas of hardstanding;
  - (ii) the erection of fencing, hoarding or any other means of enclosure;
  - (iii) the erection of security facilities and equipment and gatehouses;
  - (iv) vehicle parking;
  - (v) office and staff welfare accommodation;
  - (vi) storage, fabrication, laydown area;
  - (vii) foul water storage and pumps and surface water attenuation storage and pumps;
  - (viii) utility works including electricity, water, CCTV, telecoms and data;
  - (ix) the creation of vehicular, cycle and pedestrian access from Lee Park Way to the Temporary Laydown Area; and
  - (x) restoration of the Temporary Laydown Area.
- (f) Works No.6 – site preparation and demolition works within the area as shown on Drawing C\_0010 (AD02.01), comprising:
- (i) demolition of existing buildings, structures and plant excluding demolition of the existing EfW facility;
  - (ii) construction of a temporary ash storage building;
  - (iii) realignment of the exit ramp from the existing EfW facility; and
  - (iv) works to prepare the land shown on Drawing C\_0008 (AD02.01) for the construction of works numbers 1a, 1b, 2, 3, 4 and 5.
- (g) Works No.7 – as shown on Drawing C\_0011 (AD02.01), comprising decommissioning and demolition of the existing EfW facility and removal of:
- (i) the existing stack;
  - (ii) demolition of the existing water pumping station on Ardra Road; and
  - (iii) making good the cleared areas.

2.3.9 The draft DCO also identifies such other works as may be necessary or expedient for the purposes of or in connection with the construction, operation and maintenance of the authorised development which do not give rise to any materially new or materially different environmental effects from those assessed and set out in the Environmental Statement (ES) (AD06.02).

## **2.4 Stages of development**

- 2.4.1 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.

2.4.2 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.

2.4.3 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.

#### **Stage 1a**

2.4.4 Stage 1a involves a series of site preparation and enabling works required for the Project. The works would include:

- a. enabling works along Deephams Farm Road to create the Deephams Farm Road access;
- b. demolition of clinical waste building and maintenance workshop building;
- c. infill of artificial pond and clearance of landscaped area to form temporary storage and parking area;
- d. layout of replacement fleet parking areas and temporary support buildings on the site of the maintenance workshop;
- e. establishment of hoarded demolition work sites with safe pedestrian and vehicular access to the existing EfW facility main entrance and staff car parks. Access to the existing EfW facility would continue to be from the existing Edmonton EcoPark access;
- f. relocation of Edmonton Sea Cadets to existing EfW facility meeting rooms with safe pedestrian and vehicular access via the existing Edmonton EcoPark access at Advent Way to the main entrance and

staff car parks; storage of Edmonton Sea Cadets equipment in a container located at front of the existing EfW facility and relocate their boats to an off-site location provided by the Edmonton Sea Cadets;

- g. diversion of utilities and services affected by demolition and clearance works including diversion of the sewer trunk main owned by Thames Water Utilities Limited (TWUL) which runs under the proposed location of the RRF;
- h. demolition and clearance of EcoPark House and RRF construction zones;
- i. creation of new Lee Park Way access and temporary diversion of footpaths and cycleways; and
- j. establishment of the Temporary Laydown Area to the north of Advent Way and east of the River Lee Navigation to provide for site offices; storage of construction materials, plant and machinery; fabrication/sub-assembly; and construction staff/contractor vehicle parking. Temporary diversion of footpaths and cycleways at the Temporary Laydown Area access points.

2.4.5 The existing EfW facility would continue to operate at current capacity. The existing IBA recycling facility would continue to process ash from the existing EfW facility. The existing BWRf, FPP and IVC would continue to operate in this period.

2.4.6 Operational vehicles would continue to access the Edmonton EcoPark via the access at Advent Way. This accounts for approximately 1,063 one way vehicle movements per day.

2.4.7 Traffic associated with the Stage 1a demolition and enabling works would arrive at the Edmonton EcoPark via the existing access on Advent Way.

### **Stage 1b**

2.4.8 During Stage 1b, the RRF and EcoPark House buildings would be constructed in the southern part of the Edmonton EcoPark. It would be necessary to construct these buildings prior to the construction of the proposed ERF and demolition of the operations north of the existing EfW facility. The works required during this stage of construction would include:

- a. commencement of use of Temporary Laydown Area;
- b. relocation of LWL vehicle fleet to the north of existing EfW facility;
- c. construction of EcoPark House;
- d. construction of RRF and its weighbridges;
- e. erection of temporary ash storage building;
- f. layout of staff and visitor parking area immediately adjacent to EcoPark House;
- g. commencement of use by staff and visitor vehicles of the new Lee Park Way access;

- h. construction of the attenuation tank and associated drainage of the RRF sub-catchment; and
  - i. existing EfW facility exit ramp arrangements aligned with RRF construction area and required RRF operational vehicles routes.
- 2.4.9 The existing EfW facility would continue to operate at current capacity. The Edmonton Sea Cadets would continue to occupy space in the existing EfW facility.
- 2.4.10 The existing BWRF, FPP and IVC would continue to operate in this period, until the RRF is completed (see Stage 1c). The IBA recycling facility would continue to process ash from the existing EfW facility.
- 2.4.11 Operational vehicles would continue to access the Edmonton EcoPark via the existing Edmonton EcoPark access from Advent Way. The new Lee Park Way access would become available and be used by some staff and Edmonton Sea Cadets traffic.
- 2.4.12 Traffic associated with the construction of the RRF and EcoPark House would arrive at the Edmonton EcoPark via the existing access on Advent Way. Some traffic may arrive at the Temporary Laydown Area, travelling from the Temporary Laydown Area to the Edmonton EcoPark via Walthamstow Avenue and the existing access. Some light vehicles including construction staff shuttle buses may travel to the Edmonton EcoPark via the new Lee Park Way access.

### **Stage 1c**

- 2.4.13 During this stage of construction the facilities to the north of the existing EfW facility would be demolished to make way for the proposed ERF. The works required involve:
- a. completion of RRF and transfer of FPP/BWRF operations;
  - b. completion of EcoPark House and occupation by the Edmonton Sea Cadets;
  - c. relocation of Edmonton EcoPark stores;
  - d. disconnection of obsolete services and utilities within demolition zones;
  - e. demolition and clearance of existing FPP area;
  - f. demolition and clearance of existing BWRF area;
  - g. demolition and clearance of existing IBA area; and
  - h. demolition and clearance of existing IVC facility – composting activities to be relocated off-site and bulking facilities provided within the RRF to enable transport to third party treatment sites.
- 2.4.14 The existing EfW facility would continue to operate at current capacity, with a temporary ash storage building provided to replace the existing IBA area and allow the transfer of ash off-site for recycling.
- 2.4.15 The Recycling and Fuel Preparation Facility (RFPF) operations would commence within the RRF, with capacity to treat around 390,000 tpa. The RRC element of the RRF building would be open to members of the public

and small businesses with access via the new Lee Park Way access. On completion of EcoPark House this would be available for community and education activities, the Edmonton Sea Cadets and for office accommodation associated with operation of the Edmonton EcoPark.

- 2.4.16 Operational vehicles would continue to access the Edmonton EcoPark via the existing access on Advent Way to serve both the existing EfW facility and proposed RRF. Members of the public and small business vehicles visiting the RRC element of the RRF, users of EcoPark House and staff would access the Edmonton EcoPark via the new Lee Park Way access.
- 2.4.17 Traffic associated with the northern Application Site clearance would use the new Deephams Farm Road access.

### **Stage 1d**

- 2.4.18 During Stage 1d, the main build for the proposed ERF would occur within a defined work zone at the northern area of the Edmonton EcoPark. The works involve:
- a. construction of ERF including piling and excavation works, civil and structural works, establishment of new utilities connections;
  - b. construction of the surface water attenuation tank(s) and associated drainage of the ERF sub-catchment;
  - c. erection of a new pumping station and associated pipework to provide raw water from Deephams Sewage Treatment Works outflow channel; and
  - d. partial landscaping.
- 2.4.19 The majority of heavy goods vehicles associated with the construction of the proposed ERF would arrive at the Edmonton EcoPark via the Deephams Farm Road access. Vehicle movements associated with the delivery of concrete would be undertaken directly to the Edmonton EcoPark while approximately 50 per cent of all other construction vehicle movements would be to the Temporary Laydown Area, with onward movement to the Edmonton EcoPark when required. The majority of these vehicles would travel via the A406 North Circular Road and A1055 Meridian Way to the Deephams Farm Road access. However, any abnormal loads may travel between the Temporary Laydown Area and the Edmonton EcoPark via the existing access. This would be undertaken at a time that minimises any conflict with Edmonton EcoPark operational vehicles.
- 2.4.20 The existing EfW facility would continue to operate at current capacity and the proposed RRF and EcoPark House would be operational.
- 2.4.21 Operational vehicles would continue to access the Edmonton EcoPark via the existing access on Advent Way to serve both the existing EfW facility and RRF. Members of the public and small businesses visiting the RRC element of the RRF, users of EcoPark House and staff would access the Edmonton EcoPark via the new Lee Park Way access.



## Stage 2

- 2.4.22 This stage marks the completion of the proposed ERF, commissioning of the facility and start of operations. The existing EfW facility would then be ready for decommissioning and demolition. The works required involve:
- a. commissioning of proposed ERF;
  - b. installation of ERF weighbridges;
  - c. relocation of operations contractors compound from adjacent to the existing EfW facility to adjacent to the southern side of the ERF;
  - d. relocation of operational stores adjacent to the ERF;
  - e. relocation of operational fleet depot to adjacent to ERF; and
  - f. completion of landscaping works that are not linked to or affected by the EfW facility demolition.
- 2.4.23 The commissioning stage of the proposed ERF is estimated to take between six and twelve months. The commissioning stage is necessary in order to test all of the equipment and processes before the proposed ERF is fully operational. During this stage both the existing EfW facility and the proposed ERF would be operational as waste inputs are gradually transferred from the existing EfW facility to the proposed ERF.
- 2.4.24 Landscaping and relocation of support facilities would take place during the ERF commissioning stage with use of the Deephams Farm Road access remaining in place for the operations contractor's use, alongside staff shuttle buses from Lee Park Way as required.
- 2.4.25 The existing EfW facility would continue operation at a reduced capacity as incoming waste is transferred to the proposed ERF to allow its commissioning. The proposed ERF would increase the proportion of the waste that it takes as its commissioning progresses and both treatment lines are brought online.
- 2.4.26 The proposed RRF and EcoPark House would be operational.
- 2.4.27 Operational vehicles would continue to access the Edmonton EcoPark via Advent Way as before to serve both the existing EfW facility and proposed ERF and RRF. Some operational vehicles travelling to the ERF would use the Deephams Farm Road access. Members of the public and local businesses visiting the RRC element of the RRF would access the Edmonton EcoPark via the new Lee Park Way access.

## Stage 3

- 2.4.28 Decommissioning, stripping out and demolition of the existing EfW facility would commence after the proposed ERF is fully commissioned and tests including the reliability period have been successfully completed. The works required would involve:
- a. hoarding of the demolition work zone;
  - b. clearance of northern half of existing EfW facility site – once cleared the northern area of the EfW facility site would be used as a laydown for

demolition equipment which is required before the demolition of the main EfW facility building can proceed;

- c. completion of fleet parking and facilities area;
- d. construction of widened southern entrance and new security gatehouse;
- e. demolition and decommissioning of water pumping station;
- f. demolition of main EfW facility building;
- g. excavation of bunker and infilling with suitable material;
- h. levelling of site and make good;
- i. completion of Edmonton EcoPark landscaping works;
- j. completion of staff car parks and surface water attenuation tanks on removal of EfW facility exit ramp; and
- k. restoration of the Temporary Laydown Area.

2.4.29 The proposed ERF would operate at the capacity required with each process line capable of 350,000 tonnes per annum with a total capacity of the facility at 700,000 tonnes per annum. The proposed RRF and EcoPark House would also be operational.

2.4.30 Operational vehicles would continue to access the Edmonton EcoPark via the existing access on Advent Way as existing to serve both the ERF and RRF. Members of the public and small businesses visiting the RRC element of the RRF, users of EcoPark House and staff would access the Edmonton EcoPark via the new Lee Park Way access.

2.4.31 Traffic associated with the decommissioning and demolition of the existing EfW facility would travel to and from the Edmonton EcoPark via the existing Edmonton EcoPark access on Advent Way to minimise any conflicts with the operational ERF. Some vehicles associated with the removal of materials may be marshalled at the Temporary Laydown Area, waiting there until required on the Edmonton EcoPark. The new Deephams Farm Road access may also be used, if necessary.

#### **Stage 4**

2.4.32 Stage 4 would see the full operation of all new facilities. The proposed ERF would operate at full required capacity with each process line capable of processing 350,000 tonnes per annum with a total capacity of the facility at 700,000 tonnes per annum. The RRF would operate with a capacity of around 390,000tpa.

2.4.33 EcoPark House would be occupied by the site operator and the Edmonton Sea Cadets, and would also be available for other community and education activities.

2.4.34 Operational vehicles would continue to access the Edmonton EcoPark via the existing access on Advent Way to serve both the ERF and RRF while some movements would be undertaken using the Deephams Farm Road access. Members of the public and small businesses visiting the RRC element of the RRF, users of EcoPark House and staff would access the Edmonton EcoPark via the new Lee Park Way access.

## 2.5 Project outputs

### Electricity

- 2.5.1 The proposed ERF would have a gross power generation capacity of circa 70MW<sub>e</sub> in power only mode. The ancillary site electrical load would be approximately 9MW<sub>e</sub>, leaving 61MW<sub>e</sub> available for net export to the grid in power only mode.
- 2.5.2 Electricity export would be via 33kV underground cabling circuits to the Tottenham Grid Substation (TGS) from an on-site UK Power Networks (UKPN) switchgear. TGS is located approximately 2km from the Application Site and connects to the National Supergrid system via the co-located UKPN 123kV Substation.
- 2.5.3 The existing grid connection circuits would require upgrading by overlaying oil filled sections with polymeric ones. A further two underground cable circuits are proposed for installation alongside the existing circuits to ensure 70 Mega Volt Amp (MVA) could be exported in the case of failure of one of the circuits. Further information is set out in the Grid Connection Statement (AD05.08).

### Heat

- 2.5.4 The ERF would be enabled for CHP operation by employing an extraction condensing steam turbine with a controlled extraction point. The Project includes provision for the supply of heat in the form of hot water or steam to third party customers, with the Lee Valley Heat Network Ltd having relevant advanced proposals as described in the CHP Development Strategy (AD05.06). (LVHN) which is separately proposing a Decentralised Energy Network (DEN) with a District Heat Energy Centre (DHEC) within the boundary of the Application Site. The DHEC is not a part of the Application and will be brought forward by LVHN as a stand alone planning application to LB Enfield. However, the site for the proposed DHEC is not identified for development as part of this Application.
- 2.5.5 The Applicant and LVHN are engaged in active on-going negotiations to realise the CHP potential at the Edmonton EcoPark which will be subject to detailed design and agreement on commercial terms. The plans would see the supply of heat from the existing EfW facility to the LVHN DHEC until the proposed ERF is commissioned and takes over the heat supply around 2025. The Decentralised Energy Project Delivery Unit (DEPDU)<sup>7</sup> study undertaken for the NLWA identifies that connection to the existing EfW facility could supply around 20MW<sub>th</sub> of low carbon heat to the network.
- 2.5.6 The proposed ERF could be designed to support up to 160MW<sub>th</sub> heat supply. However, heat supply impacts power generation and with 160MW<sub>th</sub> of heat supply, gross electrical output diminishes to 15MW<sub>e</sub>. This is from a power only gross electricity generation capacity of over 70MW<sub>e</sub>. The ERF steam turbine will be designed to suit the expected heat supply requirements. The likely heat demand is expected to be 35MW<sub>th</sub> peak

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<sup>7</sup> NLWA, funded by the European Investment Bank through the GLA Decentralised Energy Project Delivery Unit (DEPDU) EfW heat offtake study, 2014.

output. Additional heat export may be provided subject to commercial viability and to a heat demand materialising.

- 2.5.7 Two routes to run heat supply pipework to the edge of the Application Site have been safeguarded. The route to the south would supply heat to the LVHN DHEC, and the other route could supply heat to the north.
- 2.5.8 Further information is set out in the Combined Heat and Power Development Strategy (AD05.06).

### **3 Planning history**

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3.1.1 This section provides an overview of the relevant planning history of the Application Site and the surrounding area.

#### **3.1 Edmonton EcoPark planning history**

3.1.1 The existing EfW facility was commissioned in 1971, and has served the north London area for almost 45 years. Since 1971, the site has seen the development of a number of additional waste facilities, becoming the Edmonton EcoPark in the late 2000s. The Edmonton EcoPark has a long history of waste related development, however, this section will focus on development taking place in recent history over the past 15 years.

3.1.2 In early 2002, plans were rejected for a large expansion to the existing EfW facility, which would have made it the largest household waste incinerator in Europe. Permission had been granted by both the EA and LB Enfield, but was refused by the then Energy Minister on the basis of the 2000 Waste Strategy<sup>8</sup> and because it would act as a disincentive to recycling beyond the statutory minimum.

3.1.3 In 2004, LWL applied for permission for the creation of an in-vessel composting (IVC) facility and maturation area. The facility was designed to receive 30,000 tonnes per annum of biodegradable organic waste collected from residents' kitchens and gardens within the NLWA area, and to compost it largely for agricultural uses. Permission was granted for this development (with conditions) and deliveries of compostable waste to the IVC facility operated by LWL at the Edmonton EcoPark commenced on 21 September 2006.

3.1.4 In 2005, an application for construction of a waste transfer station (Bulky Waste Recycling Facility (BWRF)) was approved by LB Enfield; this was a retrospective application for a BWRF which had been in use since June 2004. The application was for a facility which would recycle, transfer and treat bulky waste (which includes any waste other than 'black bag' waste).

3.1.5 In June 2009 LWL applied for permission for the erection of a waste recycling facility, ancillary office and visitors centre together with associated car parking, landscaping and temporary lorry park. This was to form the final part of the Edmonton EcoPark masterplan (alongside the previously mentioned applications). This application was later withdrawn as the NLWA was at that time proposing a procurement for waste management services that envisaged a different use of the site; note the procurement was subsequently abandoned as detailed in the Alternatives Assessment Report (AD05.03).

#### **3.2 Proposed development in the vicinity**

3.2.1 There are a number of extant planning permissions and major development proposals in the area surrounding the Edmonton EcoPark, which have been

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<sup>8</sup> Department of the Environment, Transport and the Regions, Waste Strategy 2000 for England and Wales, May 2000.

taken into consideration in developing the Project. These are summarised below.

#### ***North London Electricity Line Reinforcement (DCO)***

- 3.2.2 A DCO for the upgrading of one of two existing 275kV overhead lines running between Waltham Cross and Tottenham substations (via Brimsdown substation) and its operation at a higher voltage (400kV) was granted in April 2014. This is currently on National Infrastructure's programme of projects, and construction is proposed to last two years from 2014. The upgrading will involve works at each substation along the route. Whilst there is not a substation on the Application Site, the overhead lines pass over part of the Application Site.

#### ***Meridian Water Masterplan***

- 3.2.3 The area known as Meridian Water is located to the south of the Edmonton EcoPark. It presents an important regeneration and investment opportunity for north London. The Masterplan<sup>9</sup> for the site proposes up to 5,000 new homes and 3,000 new jobs in a new sustainable, mixed use neighbourhood, which caters for families and businesses alike. The Meridian Water Masterplan also proposes connection of the new development to the proposed LVHN. The Masterplan was approved by LB Enfield in July 2013 and LB Enfield is currently preparing planning applications to bring forward the site in stages.
- 3.2.4 The Meridian Water Masterplan is proposed and supported in the Central Leaside Area Action Plan<sup>10</sup>, LB Enfield Core Strategy<sup>11</sup> and LB Enfield Development Management Policies Document<sup>12</sup>.

#### ***Lee Valley Heat Network***

- 3.2.5 The LVHN will be a system of pipes that moves heat in the form of hot water. The supply of heat will be sourced from the existing EfW facility through a heat exchanger to be located within the EfW facility. Pipes from the existing EfW facility to the LVHN DHEC would be located in the south of the Edmonton EcoPark.
- 3.2.6 Should this Application for an ERF at the Edmonton EcoPark be granted permission then LVHN would be likely to connect to the proposed ERF after decommissioning of the existing EfW facility (subject to agreement of commercial terms etc.).
- 3.2.7 The LVHN pipework and DHEC will be subject to a separate planning application to LB Enfield.

#### ***Deephams Sewage Works***

- 3.2.8 In February 2015, planning permission to upgrade existing sewage treatment infrastructure at Deephams Sewage Treatment Works (STW)

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<sup>9</sup> LB Enfield and LDA Design (2013) Meridian Water Masterplan, July 2013.

<sup>10</sup> LB Enfield (2014) Central Leaside Proposed Submission Area Action Plan, November 2014.

<sup>11</sup> LB Enfield (2010) The Enfield Plan Core Strategy 2010 – 2025, Adopted November 2010.

<sup>12</sup> LB Enfield (2014) Development Management Document, Adopted November 2014.

was granted by LB Enfield. This site is located approximately 350m to the north of the Edmonton EcoPark.

- 3.2.9 The upgrades proposed include the phased development of primary settlement tanks, aeration lanes with integrated fixed film activated sludge media, final settlement tanks, pumping stations, blower house and control room buildings, odour control covers to primary settlement tanks, three odour control units, combined heat and power units, additional storm storage, and the demolition of redundant plant and buildings.
- 3.2.10 It is proposed that construction will commence later in 2015, and will take three years to complete.

***Kedco Waste Wood Biomass Plant***

- 3.2.11 Kedco Waste Wood Biomass Plant is located approximately 330m to the west of the Edmonton EcoPark. In April 2013 permission was granted by LB Enfield for a change of use from an existing storage building to an industrial facility for the production of renewable energy. This involved a new extension to the existing building to receive timber, a new substation and associated site works. It is proposed that construction will begin in April 2016, although timescales for development are unknown.

## 4 Scheme development

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### 4.1 Scheme development

- 4.1.1 This section sets out the process by which the Applicant determined requirements for future residual waste management, leading to the decision to apply for a DCO for an ERF and associated development. Further information is set out in the Alternative Assessment Report (AD05.03).
- 4.1.2 The strategic basis for the Applicant's decisions is the Joint Waste Management Strategy which covers the period 2004 to 2020. This strategy contains objectives and targets which set out the need to reduce the amount of waste sent from the north London area to landfill, and targets for increasing recycling in the area to 50 per cent by 2020.
- 4.1.3 Assessments were carried out relating to the site selection and technology solution to be pursued for future waste management in the north London area. These assessments were undertaken in preparation for a procurement for contracts for future waste management services, including replacement waste management facilities, with such assessment starting in 2008, and being updated in 2013 and 2014.
- 4.1.4 The selection of thermal technology with advanced moving grate is supported by the technological assessments carried out and, following developments in regional and local planning policy during 2013, is now consistent with planning policy. Advanced moving grate was concluded to be the most well proven, reliable and cost effective means of providing thermal treatment technology for Municipal Solid Waste (MSW). None of the reviewed alternative technologies (gasification, pyrolysis and plasma technology) are able to match advanced moving grate facilities with regard to energy production efficiency or annual availability.
- 4.1.5 The site selection was based on site availability and suitability and considered two sites; Edmonton EcoPark and Pinkham Way. The Draft North London Waste Plan (NLWP)<sup>13</sup> was prepared by the Constituent Boroughs during the period of the development of the waste disposal strategy. It identifies the Edmonton EcoPark as a site safeguarded for waste use in the London Plan<sup>14</sup>, and Pinkham Way as a potential new site for waste use. No other sites suitable for the Project have been identified through the NLWP process.
- 4.1.6 The following site criteria are essential for the Project:
- a. a site located in north London, in order to meet policy requirements of management of waste within the sub-region, and to reduce the impact and cost of transport of waste;
  - b. land ownership or access to the use of the land for the Applicant; this factor is included as there is limited suitable available land in the north London area, and attempts to identify a suitable alternative or additional

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<sup>13</sup> Draft North London Waste Plan, Regulation 18, July 2015

<sup>14</sup> Greater London Authority (GLA) (2015) The London Plan, the Spatial Development Strategy for London Consolidated with Alterations since 2015, March 2015.



site in 2008-2010 had led only to the identification of the site at Pinkham Way;

- c. sufficient land availability for the required foot print of facilities; this criterion allows for effective management of the residual waste from delivery by the Constituent Boroughs to treatment, minimising the need to transfer untreated waste between sites, or to incur the cost of pre-treatment or bulking activity;
- d. established waste use, to manage planning risk associated with the development of new facilities; no other sites of sufficient size with established waste use are available in the north London area;
- e. accessible location, with good road transport links for the delivery of waste from Constituent Boroughs; and
- f. sufficient site infrastructure, services and utilities for the required facilities and ongoing operations, including availability of grid connection for electricity off-take, which is demonstrated (a) through existing connections and (b) through agreement with UKPN as to future connections

4.1.7 The Edmonton EcoPark meets the criteria for a suitable site for waste management for north London, in particular as it is available to the Applicant for use for waste management purposes, and is of sufficient size to accommodate new facilities while ensuring continuity of waste treatment during the period of construction of new facilities.

## **4.2 The need for the Project**

4.2.1 The Need Assessment (AD05.04) provides an assessment of the need for the Project and the reasons why the proposed ERF is required. The Need Assessment (AD05.04) also places the development within the context of current planning policy, in particular policies relating to the generation of renewable and low carbon energy and the sustainable management of waste.

4.2.2 The assessment of need comprises two separate strands:

- a. the energy need demonstrates the energy anticipated from the proposed ERF and its relationship to climate change and energy resilience objectives; and
- b. the waste need demonstrates the forecast residual waste and the size of the facility required to manage and recover energy from this.

### **Energy need case**

4.2.3 National policy demonstrates a need for new energy generating facilities to replace planned closures and to accommodate growing demand for energy in the future. This national need is replicated at a regional level by the desire to maintain and increase London's contribution to the national energy mix and thus replacement of the generating capacity provided by the existing EfW facility at the Edmonton EcoPark. The proposed ERF will contribute to the national and the regional need for new generating facilities.

- 4.2.4 London policy on energy emphasises the Major of London's aspiration for new low and zero carbon decentralised energy sources to meet London's energy needs in a sustainable way. It also emphasises the opportunity for major generating facilities to provide low carbon heat as well as power to local homes and businesses. The proposed ERF has the potential to make a significant contribution to London's decentralised energy targets through the capability of supplying heat via a heat network.
- 4.2.5 National policy also demonstrates a need to increase dramatically the amount of renewable generation capacity in order for the UK to meet its commitments under the EU Renewable Energy Directive. Typically between one half and two thirds of black bag (residual) waste is biogenic and is therefore regarded as a source of renewable energy<sup>15</sup>.
- 4.2.6 An important aspect of London's strategy for the management of municipal waste is to minimise the carbon dioxide equivalent (CO<sub>2eq</sub>) emissions by maximising the generation of low carbon energy from waste.

#### **Waste need case**

- 4.2.7 Waste modelling has been undertaken to provide an estimate of the amount of residual waste collected by the Constituent Boroughs that will require treatment in the proposed ERF through to 2050-51.
- 4.2.8 If the application to obtain a DCO were unsuccessful, the Applicant would have insufficient capacity to manage the projected Local Authority Collected waste (LACW) once the existing EfW facility has reached the end of its operational life. The proposed ERF will support the diversion of residual waste away from landfill in line with local, regional and national policy and in line with the waste hierarchy.

### **4.3 Relationship to decentralised energy**

- 4.3.1 LB Enfield has been working with the Applicant and other partners on the development of the LVHN. A local authority controlled company, LVHN Ltd., would be responsible for managing the design, build and operation of, and customer services for those connected into the Decentralised Energy Network (DEN).
- 4.3.2 It is intended that the LVHN would initially use heat and steam from the existing EfW facility. The Combined Heat and Power (CHP) Development Strategy (AD05.06) demonstrates the potential for CHP development from the proposed ERF as the source of low carbon heat. It demonstrates that:
- a. the heat demand in the area is greater than the potential heat supply from existing and planned future centralised heat sources;
  - b. a large portion of the heat demand has been shown to be feasible for connection via heat networks in the short and long term, first materialising through LVHN plans; and

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<sup>15</sup> Department for the Environment, Food and Rural Affairs (2013) Energy from Waste: A guide to the Debate, February 2014

c. arrangements for heat supply from the ERF facility itself, from the ERF facility to the edge of the Application Site and connections to planned future heat networks have been accounted for.

4.3.3 The principles required to realise the CHP potential at the Edmonton EcoPark have been established between LVHN Ltd. and the Applicant and are subject to detailed design and agreement on commercial terms. The plans would see the supply heat from the existing EfW facility to the LVHN DHEC until the proposed ERF is commissioned and takes over the heat supply around 2025. Should consent be granted for the Application, LVHN Ltd. would seek to develop the DHEC at Edmonton EcoPark which would be subject to a separate planning application.

## 4.4 Consultation

4.4.1 The Applicant has consulted widely about the Project. This has comprised both formal and informal consultation with stakeholders, the local community and other interested parties.

4.4.2 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).

4.4.3 A full description of the consultation process along with a summary of the comments received and the Project's response to them can be found in the Consultation Report (AD05.01).

### Phase One Consultation

4.4.4 Formal consultation was undertaken in two phases. The first, Phase One Consultation, ran for a period of 61 days from 28 November 2014 to 27 January 2015. In accordance with Sections 42 and 47 of the Planning Act 2008 (as amended) and as set out in the Statement of Community Consultation (SoCC), the following groups were consulted:

- a. prescribed consultees (Section 42(a) and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended));
- b. local authorities (Section 42(b) and section 43);
- c. The Greater London Authority (Section 42(c));
- d. 'landowners' (persons who fall within the categories of section 44) (Section 42(d)); and
- e. the local community (Section 47).

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

4.4.6 A variety of methods were used to engage people, as set out below, these methods were also used during Phase Two Consultation:

- a. public exhibitions;
  - b. written information;
  - c. advertisements;
  - d. letters and newsletters;
  - e. community briefings; and
  - f. a project website and telephone line.
- 4.4.7 A total of 72 responses were received during Phase One Consultation and the Project was generally well received. All comments were carefully considered and taken into account in developing the proposals. A number of changes to the Project were made in response comments, the main changes are summarised below. For a full analysis refer to the Consultation Report (AD05.01).
- 4.4.8 Respondents generally felt that the overall visual impact of the ERF should be reduced as far as possible, in response the Applicant progressed with a design which seeks to minimise the scale and massing of the proposed ERF.
- 4.4.9 There was generally equal support for a single chimney flue or 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.
- 4.4.10 Respondents noted that incorporating ecological measures into the design was important and that the Project should integrate with the surrounding environment, in particular the LVRP. This has been achieved by integrating landscape proposals that enhance habitats along the eastern edge, as well as green and brown roofs.
- 4.4.11 Some respondents indicated a preference for air cooling technology, whilst others had a preference for water cooling. The Applicant undertook further consultation on the cooling technology during Phase Two Consultation.
- 4.4.12 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.
- 4.4.13 In response to comments raised on the safety of pedestrians and cyclists, new pedestrian and cycle facilities were incorporated into the proposals for improvements along the part of Lee Park Way within the Application Site.
- 4.4.14 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**

- 4.4.15 Phase Two Consultation ran for a period of 44 days, between 18 May and 30 June 2015. The same type of organisations were consulted as during Phase One Consultation.

- 4.4.16 This phase of consultation provided more detail on proposals, including site design and layout, preliminary environmental information, access proposals, the cooling system, management of construction and the visitors centre proposals.
- 4.4.17 Many draft application documents were available during Phase Two Consultation including the Interim Book of Plans, Interim Design Statement, Interim Transport Assessment (TA) and Interim Code of Construction Practice (CoCP). The Preliminary Environmental Information Report (PEIR) was also available. A summary of the responses received during Phase One Consultation and the Project's response to them was also available. Refer to the Consultation Report (AD05.01) for a full list of information published.
- 4.4.18 A total of 123 responses were received during Phase Two Consultation, and as before, the Project was generally well received. A number of changes were made to the Project in response to comments raised, as summarised below.
- 4.4.19 EcoPark House was reduced from three storeys to two storey in response to comments that the top storey of the building was unnecessary and ill-fitting with the surrounding context.
- 4.4.20 Some respondents considered the viewing platform on the proposed ERF to be too large and overly dominant. In response the scale of the viewing platform was significantly reduced and it was been relocated to the southern edge of the ERF to maximise views.
- 4.4.21 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 (AD05.13) 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.
- 4.4.22 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 cooling technology.

#### **Informal consultation**

- 4.4.23 In addition to the formal stages of consultation the Applicant has undertaken informal consultation throughout the development of the scheme.
- 4.4.24 This has included meetings and correspondence with local residents groups, Members briefings and regular meetings with stakeholders, including Transport for London, LB Enfield, EA and GLA. Details of informal consultation are set out in the Consultation Report (AD05.01).

## 5 Legislative and policy framework

### 5.1 Introduction

5.1.1 This section describes the legislative and policy framework for decision-making for NSIPs, the matters which the Planning Inspectorate must consider in examining an application and to which the SoS for Energy and Climate Change must have regard when determining the application.

5.1.2 This section will provide a detailed summary of the policy contained in National Policy Statements (NPS), which will be the primary consideration for the SoS in making their decision regarding this application.

5.1.3 A summary is then included of other relevant policy at the national, London and local level, supported by a more detailed overview set out in Appendix A. A policy compliance checklist is set out in Appendix B.

5.1.4 Table 5.1 below summarises the relevant legislation and policy documents.

Table 5.1: Legislation and Policies of relevance to the Project

Type	Policy / Legislation
<b>Legislation</b>	<ul style="list-style-type: none"> <li>a) European Directives               <ul style="list-style-type: none"> <li>o The European Energy Directive (2009/28/EC)</li> <li>o The Waste Framework Directive (2008/98/EC)</li> <li>o The Environmental Impact Assessment Directive (85/337/EEC)</li> <li>o The Habitats Directive (92/43/EEC)</li> <li>o The Landfill Directive (1999/31/EC)</li> <li>o The Waste Incineration Directive (2000/76/EC)</li> </ul> </li> <li>a) Planning Act 2008 (as amended)</li> <li>b) Various statutory instruments made under the Planning Act 2008</li> </ul>
<b>National Planning Policy and Strategies</b>	<ul style="list-style-type: none"> <li>a) Overarching National Policy Statement for Energy (EN-1) (July 2011)</li> <li>b) National Policy Statement for Renewable Energy Infrastructure (EN-3) (July 2011)</li> <li>c) National Planning Policy Framework (March 2012)</li> <li>d) National Planning Policy for Waste (October 2014)</li> <li>e) Waste Management Plan for England (December 2013)</li> <li>f) Meeting the Energy Challenge - Energy White Paper (2007)</li> <li>g) UK Renewable Energy Strategy (July 2009)</li> <li>h) The UK Low Carbon Transition Plan (July 2009)</li> <li>i) The UK National Renewable Action Plan (2010)</li> <li>j) UK Renewable Energy Roadmap (2011)</li> <li>k) Planning Our Electric Future White Paper (2011)</li> <li>l) Government Review of Waste Policy (2011)</li> <li>m) UK Bioenergy Strategy (April 2012)</li> </ul>

	<ul style="list-style-type: none"> <li>n) UK Renewable Energy Roadmap Update (2013)</li> <li>o) The Waste Management Plan for England (2013)</li> <li>p) Annual Energy Statement (2014)</li> <li>q) The National Infrastructure Plan (2014)</li> </ul>
<b>London Policy</b>	<ul style="list-style-type: none"> <li>a) The London Plan (March 2015)</li> <li>b) London's Municipal Waste Strategy</li> <li>c) Mayor's Business Waste Management Strategy</li> <li>d) The Mayor's Climate Change Adaptation Strategy (October 2011)</li> <li>e) The Mayor's Energy Strategy: Delivering London's Energy Future (October 2011)</li> </ul>
<b>Sub-regional Policy</b>	<ul style="list-style-type: none"> <li>a) Draft North London Waste Plan (July, 2015)</li> <li>b) Upper Lee Valley Opportunity Area Framework (July 2013)</li> <li>c) Central Leaside Area Action Plan</li> </ul>
<b>Local Policy</b>	<ul style="list-style-type: none"> <li>a) Enfield Core Strategy (November 2010)</li> <li>b) Enfield Development Management Document Policies (November 2014)</li> <li>c) Edmonton EcoPark Planning Brief Supplementary Planning Document (SPD) (May 2013)</li> <li>d) Section 106 SPD (November 2011)</li> <li>e) Revised Draft S106 SPD Public Consultation Version (March 2015)</li> </ul>

5.1.5 Figure 5.1 shows the hierarchy of the most relevant policy documents in the decision making process.

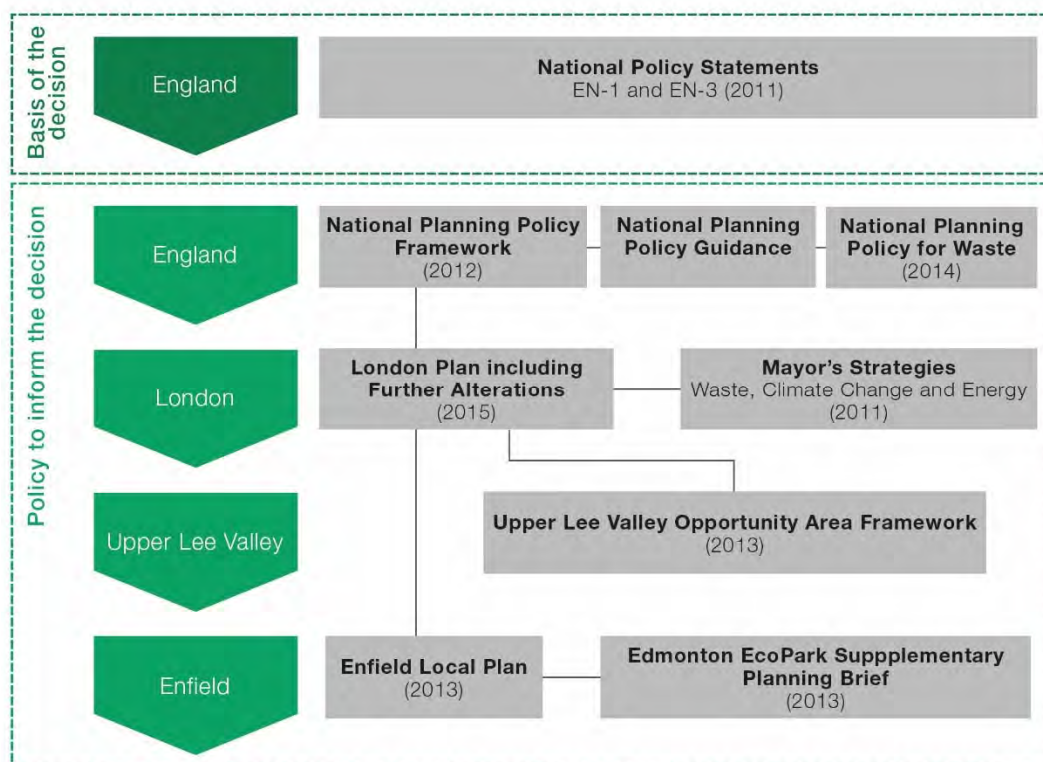


Figure 5.1: Planning Policy Hierarchy

- 5.1.6 The Planning Act 2008 (as amended) provides that Nationally Significant Infrastructure Projects (NSIPs) must be decided against NPSs. The Planning Act 2008 (as amended) states that where a NPS is in place, this should be the primary consideration for the SoS in making decisions regarding applications for NSIPs.
- 5.1.7 This is reiterated in Section 104 of the Planning Act 2008 (as amended) which sets out that the SoS is required to determine applications for NSIPs in accordance with the relevant NPSs unless this would:
- lead to the UK being in breach of its international obligations;
  - be in breach of any statutory duty imposed on the SoS;
  - be unlawful;
  - result in the adverse impacts of the development outweighing its benefits; or
  - be contrary to regulations about how decisions are to be taken.
- 5.1.8 The SoS must also have regard to any 'local impact report' submitted by a relevant local authority, and any relevant matters prescribed in regulations.
- 5.1.9 Paragraph 4.1.5 of the NPS EN-1 clarifies the matters that the SoS may consider both important and relevant. It confirms that these may include development plan documents or other documents in the local development framework. NPS EN-1 is clear, however, that in the event of a conflict between these or any other documents and an NPS, the NPS prevails for the purposes of SoS decision-making given the national significance of the infrastructure.



- 5.1.10 The relevant national policy statements for the Project are NPS EN-1 and EN-3.

### Overarching National Policy Statement for Energy (NPS EN-1)

- 5.1.11 NPS EN-1 sets out how the energy sector can help to deliver the Government's climate change objectives and contribute to a diverse and affordable energy supply for the UK. It covers Government policy on energy and energy infrastructure development, the assessment principles for deciding applications and how impacts from new energy infrastructure should be considered in applications. NPS EN-1 identified an urgent 'need' for energy infrastructure development (Paragraph 4.1.2).
- 5.1.12 Important considerations for the SoS to taken into account when making decisions about development consent applications for energy NSIPs are (Paragraph 4.1.3):
- the potential benefits including the contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
  - the potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 5.1.13 NPS EN-1 covers the Assessment Principles which should be taken into consideration for energy projects, those of relevance to the Project are summarised in Table 5.2.

Table 5.2: Assessment Principles in NPS EN-1

Topic	Policy	Ref
<b>Environmental Statement</b>	'Applicants are required to submit an Environmental Statement (ES) outlining the environmental impacts of the development.'  The ES should set out the impacts (environmental, social and economic) of all stages of development.  For the purposes of the proposed EfW plant, the ES is required to include an Environmental Impact Assessment (EIA).	Section 4.2.
<b>Habitat and Species Regulation</b>	The Planning Inspectorate must consider whether the project has a significant effect on a European site (or a site similarly protected by policy) either alone or in combination with other plans or projects.  The applicant is required to consult with Natural England and provide any information necessary for Appropriate Assessment to the Planning Inspectorate.  This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.	Section 4.3.
<b>Alternatives</b>	There is no general requirement to consider alternatives, however there are a number of specific situations in which alternatives must be considered: <ul style="list-style-type: none"> <li>the ES is required to contain information on the main alternatives considered, with the primary economic,</li> </ul>	Section 4.4.

Topic	Policy	Ref
	<p>social and environmental reasons for any choices made; and</p> <ul style="list-style-type: none"> <li>• some specific legislation requires consideration of alternatives e.g. Habitats Directive.</li> </ul> <p>EN-1 also imposes a number of specific requirements to consider alternatives, these are:</p> <ul style="list-style-type: none"> <li>• <b>Biodiversity and Geological Conservation:</b> in order to avoid 'significant harm' to biodiversity and geological conservation interests, the applicant should address any mitigation issues and consider reasonable alternatives;</li> <li>• <b>Flood Risk:</b> Nationally significant energy infrastructure projects can be located in Flood Zone 3 or Zone C subject to the Exception Test, if there is no reasonably available site in Flood Zones 1 or 2 or Zones A &amp; B. Alternative sites should be considered and choices explained.</li> <li>• <b>Landscape and Visual:</b> the applicant should consider the possibility (and cost) of developing outside the designated area, or meeting the need in some other way.</li> </ul>	
<p><b>Criteria for 'Good Design' for Energy Infrastructure</b></p>	<p>Good design, including aesthetics, functionality, sensitive use of materials and sensitive design in relation to landscape character should be considered in any development application. Applicants must justify the design and are encouraged to seek independent advice.</p> <p>Applicants must demonstrate 'a sustainable structure and efficient use of resources' for energy infrastructure.</p> <p>Decisions will assess the extent to which the application fulfils 'the ultimate purpose of the infrastructure' taking into account any operation, safety and security requirements to which the design must adhere.</p>	<p>Section 4.5.</p>
<p><b>Consideration of Combined Heat and Power (CHP)</b></p>	<p>As outlined in DECC's 2006 guidelines, a development application for a thermal generating station is required to include CHP, or at least the consideration of CHP.</p> <p>Applicants should consult with a number of stakeholders, including: potential heat customers, the Homes and Communities Agency (HCA), Local Enterprise Partnerships (LEPs) and Local Authorities.</p>	<p>Section 4.6</p>
<p><b>Climate Change Adaptation</b></p>	<p>Climate Change projections for UK are developed by government, alongside a National Adaptation Programme. the Planning Inspectorate may take into account energy utilities' reports to the Secretary of State when assessing measures for climate change adaptation put forward in applications for new energy infrastructure.</p> <p>The Planning Inspectorate must consider the UK Climate Projections available at the time the applicant's ES was prepared to ensure appropriate mitigation and adaptation measures are identified. At the very least, the emissions scenario from the Independent Committee on Climate Change (ICCC) at the time of writing should be used.</p> <p>Adaptation measures should use the most up-to-date UK Climate Projections and the Government's latest UK</p>	<p>Section 4.8</p>

Topic	Policy	Ref
	Climate Change Risk Assessment, and consultation with the Environment Agency should be undertaken.	
<b>Grid Connection</b>	A grid connection will be secured through discussion with National Grid.  Although the applicant does not need to have accepted or received a formal offer of grid connection at the time of the application, the Planning Inspectorate will need to be satisfied that there is no reason why a grid connection could not be secured.	Section 4.9
<b>Pollution Control and Other Environmental Regulatory Regimes</b>	The Planning Inspectorate will focus on whether the development proposes an 'acceptable use of land. A number of projects to which EN-1 is relevant will be subject to the Environmental Permitting (EP) regime, which sets various operational waste management requirements for certain activities.  An applicant is required to show that all relevant EP requirements can be met. They must prove to the Planning Inspectorate that the relevant pollution control authority will be satisfied that adequate regulation of potential releases is ensured, and that additional pollution created by the site will not make the development 'unacceptable' when combined with existing sources of pollution at the site.	Section 4.10
<b>Safety</b>	The Health and Safety Executive (HSE) should be consulted on all safety related matters.  To prevent major accidents involving dangerous substances and reduce the impacts upon people and the environment should they be unavoidable, certain energy infrastructure projects are required to meet the Control of Major Accident Hazards (COMAH) Regulations 1999. An applicant in this position should consult early with the 'Competent Authority.'	Section 4.11
<b>Hazardous Substances</b>	Hazardous Substances consent should be sought by all applications proposing to hold more than a certain threshold of hazardous substances on site.  Pre-application consultation should be held with HSE but it is the responsibility of the Planning Inspectorate to decide whether to grant Hazardous Substances consent when considering the development consent order.	Section 4.12
<b>Health</b>	The ES should assess any impacts of the proposed development on human beings, identifying adverse health impacts and any necessary mitigation measures.  Elements of energy infrastructure which may negatively affect health are generally subject to separate regulation and are thus these are unlikely to be used a reason for refusal under the Planning Act 2008.	Section 4.13
<b>Common Law Nuisance and Statutory Nuisance</b>	Under section 79(1) of the Environmental Protection Act 1990 applicants must demonstrate to the Planning Inspectorate that they have considered potential sources of nuisance and proposed mitigation measures for new energy infrastructure at the application stage, to ensure that 'appropriate requirements' can be included in a subsequent development consent order.	Section 4.14

Topic	Policy	Ref
	Statutory authority for 'carrying out development consented to by, or doing anything else authorised by, a development consent order' is conferred by Section 158 of the Planning Act 2008. This is conferred only for the purpose of providing a defence in any civil or criminal proceedings for nuisance. The Planning Inspectorate can choose not to apply the defence of the statutory authority in any particular case, but must consider whether a particular nuisance is an inevitable consequence of the development.	
<b>Security Considerations</b>	If a proposed development involves potentially 'critical' infrastructure, national security considerations may be required. It is the responsibility of experts from the Centre for the Protection of National Infrastructure (CPNI) and the Office for Civil Nuclear Security (OCNS) to confirm with the Planning Inspectorate that security issues have been adequately addressed.  Only sufficient information is required to allow the Planning Inspectorate to assess security issues with the development consent when making a decision on the application.	Section 4.15
<b>GENERIC IMPACTS</b>		
<b>Air quality and emissions</b>	An assessment of the effects of the project upon air quality should be undertaken where the proposed development may have adverse impact on air quality and emissions. This should be part of the ES.  In decision making, the Planning Inspectorate will generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits.  Mitigation measures will need to be considered, where necessary, both for operational and construction emissions. This links to details set out in Section 4.10.	Section 5.2
<b>Biodiversity and geological conservation</b>	If the application is subject to EIA, the ES should clearly outline any impacts the application on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. This should also show how opportunities to conserve and enhance biodiversity and geological conservation interests have been optimised.  Appropriate mitigation measures should be included within any proposed development.	Section 5.3
<b>Dust, odour, artificial light, smoke, steam and insect infestation</b>	An assessment of the potential for insect infestation and potential negative effects of emissions of odour, dust, steam, smoke and artificial light should be set out as part of the Environmental Statement. This should particularly consider the type, quantity and timing of emissions; effects of the emission on identified premises or locations; and measures to be employed in preventing or mitigating the emissions. Consultation should be undertaken with	Section 5.6

Topic	Policy	Ref
	<p>the relevant local planning authority, and the EA about the scope and methodology of the assessment.</p> <p>Where necessary, appropriate mitigation measures should be included within any proposed development, including engineering, lay-out and administrative measures.</p>	
<b>Flood Risk</b>	<p>A Flood Risk Assessment, setting out and assessing the risks from all forms of flooding to and from the project, and outlining any mitigation or management measures, will be required for the following applications for energy projects:</p> <ul style="list-style-type: none"> <li>• 1 hectare or greater in Flood Zone 1 in England or Zone A in Wales;</li> <li>• All located in Flood Zones 2 and 3 in England or Zones B and C in Wales;</li> <li>• Less than 1 hectare, but may be subject to sources of flooding other than rivers and the sea (for example surface water).</li> </ul> <p>Pre-application consultation with the EA is required for applicants for projects which may be affected by, or may add to, flood risk.</p>	Section 5.7
<b>Historic Environment</b>	<p>The ES should provide a description of any significant heritage assets impacted upon by the proposed development.</p> <p>Where the application is proposed to have an affect on the setting of a heritage asset, representative visualisations may be required.</p> <p>The extent of any impact on heritage assets should be clearly set out in the application and supporting documents.</p>	Section 5.8
<b>Landscape and Visual</b>	<p>A landscape and visual assessment and report should be provided within the ES. This should highlight any impacts of the proposed development (during construction and operation) on landscape components and character. This should cover topics including, visibility and conspicuousness of the project, potential impacts on views and visual amenity, and light pollution effects.</p>	Section 5.9
<b>Land use including open space, green infrastructure &amp; Green Belt</b>	<p>An assessment of existing and proposed land uses surrounding the application site, and any impacts of the proposed development upon this should be provided in the ES.</p> <p>Development in the Green Belt should not be approved except in very special circumstances. The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them.</p>	Section 5.10
<b>Noise and Vibration</b>	<p>A noise impact assessment should be provided alongside the application, where significant noise affects are expected. This should assess the noise generating aspects of the proposed development; identify those areas which may affected by noise; provide a prediction of how the proposed development will affect the noise</p>	Section 5.11

Topic	Policy	Ref
	<p>environment; and propose measures to mitigate those impacts.</p> <p>Good design should be used to minimise adverse impacts, including: use of quiet cost-effective plant; containment of noise within buildings wherever possible; effective plant layout; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.</p>	
<b>Socio-economic</b>	<p>An assessment of the socio-economic affects of the proposed development should be undertaken at local or regional levels, where the potential impacts may be significant. This assessment should cover all relevant socio-economic impacts, including: job creation; training opportunities; local service provision; local infrastructure provision; educational and visitor facilities; and a cumulative effects assessment.</p>	Section 5.12
<b>Traffic and Transport</b>	<p>If a project is likely to have significant transport implications, transport assessment should be included in the ES. Applicants should consult the Highways Agency and Highways Authorities as appropriate on the assessment and mitigation.</p> <p>A travel plan should be provided, where appropriate, which covers demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.</p> <p>Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective</p>	Section 5.13
<b>Waste Management</b>	<p>Arrangement for the management of any waste produced on site should be set out in a Site Waste Management Plan. This would cover the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.</p> <p>Where the project will be subject to the EP regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.10 will apply.</p>	Section 5.14
<b>Water quality and resources</b>	<p>Should the proposed development be likely to affect the water environment, an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES.</p>	Section 5.15

### National Policy Statement for Renewable Energy Infrastructure (NPS EN-3)

- 5.1.14 NPS EN-3 sets out the 'Technology Specific Considerations' to be taken into account in the preparation and assessment of applications for

renewable energy infrastructure, including impacts and matters including EfW.

- 5.1.15 Taken together with NPS EN-1, this provides “*the primary basis for decisions by the Infrastructure Planning Commission (IPC) on applications it receives for nationally significant renewable energy infrastructure*<sup>16</sup>.” The policies set out in this NPS are additional to those on generic impacts set out in NPS EN-1 and do not replace them.
- 5.1.16 The policy states that “*The IPC is expected to adhere to locational considerations when deciding on renewable energy infrastructure projects, and should prioritise sites for development where the resource exists and where it is economically feasible to allow such development.*”
- 5.1.17 NPS EN-3 recognises that EfW will play an increasingly important role in meeting UK’s energy needs. It can also contribute to meeting UK’s renewable energy targets where the waste burned is deemed renewable. Table 5.3 summarises relevant policies.

Table 5.3: Relevant Policies in NPS EN-3

Policy	Ref
Regarding water resources, EfW proposals should consider how the plant will ‘be resilient to’ increased flood risk and risk of drought.	Paragraph 2.3.3
If the fuel used at an EfW plant is a prepared fuel, such as SRF, the waste hierarchy and conformity with it may have been assessed by the Waste Authority. The IPC (now the Planning Inspectorate) must take account of any assessment in considering the application.	Paragraph 2.5.9
The Planning Inspectorate will not consider throughput volumes as a factor in decision making. Nevertheless, any adverse impacts resulting from an increase in throughput, such as traffic increases or air quality changes will be considered.	Paragraph 2.5.13
All development consent order applications must provide details of how the generating station will be connected, alongside any particular environmental issues arising from this proposed connection. This accords with Section 4.9 in EN-1.	Paragraph 2.5.24
Multi-modal transport of materials (fuels and residues) is promoted in government policy and developments will be expected to locate new facilities close to these multi-modal connections. Where possible applicants should: <ul style="list-style-type: none"> <li>• use existing transport routes;</li> <li>• use rail or water transport (although viability of this should be considered as part of the economic assessment of the scheme);</li> <li>• connect road transport to the rail network, waterway or port;</li> <li>• include adequate access from the main highway network.</li> </ul> Any new transport infrastructure proposed will be assessed by the Planning Inspectorate, and must be found acceptable in accordance with Section 5.13 of EN-1.	Paragraph 2.5.25

<sup>16</sup> The IPC was abolished by the Localism Act 2011, applications are now examined by the Planning Inspectorate, and final decisions taken by the Secretary of State for Energy and Climate Change.

Policy	Ref
A new development should consider CHP as part of its application, or show that CHP has been considered. The Planning Inspectorate will seek further information should this not be provided, and development consent will not be given until the Planning Inspectorate is satisfied that sufficient evidence about CHP is provided.	Paragraph 2.5.26 to 2.5.27
EfW developments in the Green Belt are considered inappropriate development. 'Very special circumstances' which clearly outweigh negative impacts will need to be shown for projects in the Green Belt to proceed, such as wider environmental benefits associated with increased production of energy from renewable sources.	Paragraph 2.5.25

5.1.18 Sections 2.5.37 to 2.5.87 of NPS EN-3 outline a number of assessments required as part of the EIA for an NSIP for an EfW application. These include:

- a. an assessment of the air emissions resulting from the proposed infrastructure (Section 5.2 of EN-1);
- b. an assessment of the landscape and visual effects of the proposed infrastructure (Section 5.9 of EN-1);
- c. a noise assessment of the impacts on amenity in case of excessive noise from the project (Section 5.11 in EN-1);
- d. an assessment of the potential for insect infestation and emissions of odour as set out in EN-1 Section 5.6 with particular regard to the handling and storage of waste for fuel;
- e. an assessment of the proposed waste combustion generating station that examines the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority; and
- f. an assessment as required in EN-1, Section 5.15 of the impacts on water quality or resource. The assessment should particularly demonstrate that appropriate measures will be put in place to avoid or minimise adverse impacts of abstraction and discharge of cooling water.

## 5.2 Other relevant planning policy

5.2.1 Although the NPS are the primary policy documents used in decision making for DCOs, the application must still have regard to other policy at the national, regional and local level. Where there is disagreement between these policies and the NPS, the latter will take precedence.

5.2.2 This section provides an overview of the other planning policy which is relevant to the Application, and has been taken into account in development of the scheme. A more detailed summary is provided in Appendix A.

### National policy

5.2.3 There are a number of national policy documents which have been considered in the development of the application, beyond the NPSs outlined in Section 5.2.



- 5.2.4 At the strategic level, the NPPF was published in March 2013 and sets out the Government's planning policies for England and forms part of other relevant matters considered for determining DCO applications. The NPPF does not specifically contain any waste management policies however, it states that decisions on waste applications should have regard to policies in the NPPF as far as these are relevant. On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance web-based resource to provide support and clarification on the policies outlined in the NPPF.
- 5.2.5 There are also a number of energy national policy documents, strategies and papers, to which this application has paid regard:
- a. Meeting the Energy Challenge - Energy White Paper (May 2007)<sup>17</sup>: sets out the Government's international and domestic energy strategy. States that Government strategy will address the risks to security of electricity supply and the need for substantial new investment in power stations and networks in various ways, including by encouraging the development of low carbon electricity generation technologies;
  - b. UK Renewable Energy Strategy (July 2009)<sup>18</sup>: states that the UK needs to radically increase the use of renewable electricity and sets out the path to meet the target to ensure 15 per cent of energy comes from renewable sources by 2020<sup>19</sup>;
  - c. The UK Low Carbon Transition Plan (July 2009)<sup>20</sup>: sets out the UK's low carbon transition plan to 2020. One of the key steps is to get 40 per cent of electricity from low carbon sources by 2020;
  - d. The UK National Renewable Action Plan (July 2010)<sup>21</sup>: provides details on a set of measures that would enable the UK to meet its 2020 target. The Plan comprises three components: financial support for renewables, unblocking barriers to delivery, and developing emerging technologies;
  - e. UK Renewable Energy Roadmap (2011)<sup>22</sup>: provides a delivery Roadmap to achieve the UK's renewable energy target. In respect of biomass electricity the Roadmap proposes: publishing a UK Bioenergy Strategy; applying the Strategy in deciding, new Renewables Obligation bands; focus on measures to support long-term waste fuel supplies; working with regulators to introduce cost effective fuel monitoring and sampling systems and ensure that environmental legislation does not have an unintended impact on renewable energy plant;

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<sup>17</sup> HM Government (2007) Meeting the Energy Challenge - Energy White Paper, May 2007.

<sup>18</sup> HM Government (2009) UK Renewable Energy Strategy, July 2009.

<sup>19</sup> A number of the policies set targets for 2020, at which time the proposed ERF would not be operational. It is assumed that beyond 2020 policy requirements would be no less than those set for 2020.

<sup>20</sup> HM Government (2009) The UK Low Carbon Transition Plan, National strategy for climate and energy, July 2009.

<sup>21</sup> Department of Energy and Climate Change (2010) The UK National Renewable Action Plan, July 2010.

<sup>22</sup> Department of Energy and Climate Change (2011) UK Renewable Energy Roadmap, July 2011.

- f. Planning Our Electric Future White Paper (2011)<sup>23</sup>: sets out the Government's commitment to transform the UK's electricity system to ensure that future electricity supply is secure, low-carbon and affordable;
- g. Annual Energy Statement (2014)<sup>24</sup>: sets out the government's progress against its energy policy priorities. The Statement reports that in 2013 5.2 per cent of the UK's final energy consumption was sourced from renewable sources, making progress to the 15 per cent target by 2020;
- h. UK Bioenergy Strategy (April 2012)<sup>25</sup>; articulates a vision for the growth of sustainable biomass energy in the UK;
- i. UK Renewable Energy Roadmap Update (November 2013)<sup>26</sup>: the second update to the 2011 Renewable Energy Roadmap. Records that the UK has made good progress against the 15 per cent target. Notes that biomass, energy from waste Combined Heat and Power (CHP) and heat pumps remain key renewable heat technologies; and
- j. National Planning Policy for Waste (October 2014)<sup>27</sup>: sets out a number of key planning objectives for sustainable waste management, requirements for waste plan-making authorities and the approach for the determination of planning applications. The policies set out in this document may be material to decisions for individual planning applications.

5.2.6 Similarly, there are a number of waste national policy documents, strategies and papers, to which this application has paid regard:

- a. The Waste Management Plan for England (December 2013)<sup>28</sup>: provides analysis on waste management in England, bringing current and planned waste management policies together in one place. The Waste Management Plan for England supports efficient energy recovery from residual waste – of materials which cannot be reused or recycled - to deliver environmental benefits, reduce carbon impact and provide economic opportunities;
- b. Government Review of Waste Policy in England 2011 (June 2011)<sup>29</sup>; evaluates waste management policies for England and their delivery to ensure that the policies are fit for purpose, meet society's expectations while reflecting the Government's ambitions for a zero waste economy. The Review makes a commitment to work to remove barriers to energy from waste technologies by ensuring information is available and readily understood; and provide the necessary framework to address market

<sup>23</sup> Department of Energy and Climate Change (2011) Planning our electric future: a White Paper for secure, affordable and low-carbon, July 2011.

<sup>24</sup> Department of Energy and Climate Change (2014) Annual Energy Statement, June 2014.

<sup>25</sup> Department of Energy and Climate Change (2012) UK Bioenergy Strategy, April 2012

<sup>26</sup> Department of Energy and Climate Change (2013) UK Renewable Energy Roadmap: 2013 Update, November 2013.

<sup>27</sup> Department for Communities and Local Government (2014) National Planning Policy for Waste, October 2014.

<sup>28</sup> Department for Environment, Food and Rural Affairs (2013) The Waste Management Plan for England, December 2013.

<sup>29</sup> Department for Environment, Food and Rural Affairs (2011) Government Review of Waste Policy in England 2011, June 2011.

failures and ensure the correct blend of incentives are in place to support the development of recovery infrastructure as a renewable energy source; and

- 5.2.7 The National Infrastructure Plan (December 2014)<sup>30</sup> is also of relevance, this shows the Government's progress on infrastructure delivery and sets out its long-term plans for UK infrastructure. The National Infrastructure Plan notes that large-scale investment in gas and low-carbon electricity generation is vital in order to replace ageing energy infrastructure, maintain secure energy supplies and meet legally-binding environmental targets.
- 5.2.8 The National Infrastructure Plan also recognises that waste and resource management is critical to the UK and notes that the UK needs sufficient waste infrastructure capacity to be in place to meet the requirements of the EU Landfill Directive targets for biodegradable municipal waste.

### **London policy**

- 5.2.9 At the London level, there are a number of policy documents which are of particular relevance to the Application, and have been taken into account in the development of the Application proposals. Of particular importance is The London Plan consolidated with alterations since 2011, which provides the strategic framework for the development of London until 2036 and forms part of the development plan for Greater London. It integrates economic, transport, environmental and social plans for the capital.
- 5.2.10 The London Plan contains a number of policies of relevance to the application. Edmonton EcoPark falls within the Upper Lee Valley Opportunity Area, introduced in Policy 2.13 Opportunity Areas and Areas of Intensification. Specific reference to the Edmonton EcoPark is made in Annex One, which states that it has potential to provide heat and power to neighbouring developments, and is the largest waste facility in London. In addition Policy 5.17 highlights the need to increase waste processing capacity in London, reiterating a commitment to identify opportunities for new waste capacity, including strategically important sites for waste management and treatment, and resource recovery works.
- 5.2.11 In addition to the London Plan, a number of other regional, mayoral documents have been taken into consideration in the development of this application:
- a. London's Wasted Resource London's Municipal Waste Management Strategy (November 2011)<sup>31</sup> details the Mayor's policies for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining.

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<sup>30</sup> HM Treasury (2014) National Infrastructure Plan 2014, December 2014.

<sup>31</sup> Mayor of London (2011) London's Wasted Resource: The Mayor's Municipal Waste Management Strategy, November 2011.

- b. Making Business Sense of Waste: The Mayor's Business Waste Management Strategy (November 2011)<sup>32</sup> details the Mayor's strategy for London's business waste.
- c. Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaptation Strategy (October 2011)<sup>33</sup>: details the Mayor's strategic approach to managing the climate risks being faced in the capital now and in the future.
- d. Delivering London's Energy Future: The Mayor's Climate Change Mitigation And Energy Strategy (October 2011)<sup>34</sup>: sets out the Mayor's strategic approach to limiting further climate change and securing a low carbon energy supply for London.
- e. Mayor's Sustainable Design and Construction Supplementary Planning Guidance (April 2014)<sup>35</sup>: sets out in greater detail the mayor's priorities in delivery high quality design and construction in a range of areas, including noise, air quality, flood risk, energy and site layout.
- f. Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy – SPG (April 2013)<sup>36</sup>.
- g. Other Mayoral Strategies include the Mayor's Transport Strategy (May 2010)<sup>37</sup>; Mayor's Air Quality Strategy (December 2010)<sup>38</sup>; Securing London's Water Future: the Mayor's Water Strategy (October 2011)<sup>39</sup> and Mayor's Economic Development Strategy for London (May 2010)<sup>40</sup>.

### Sub-regional policy

- 5.2.12 At the sub-regional level, the Draft NLWP is an important document regarding this application.
- 5.2.13 Prepared by the seven Constituent Boroughs, the Draft NLWP was published for consultation in July 2015, and identifies sites for waste management use for north London's waste up to 2031. It also sets out policies for determining relevant planning applications.
- 5.2.14 The draft NLWP sets out an aim of "*achieving net self-sufficiency in the management of North London's waste*" through the provision of adequate land for waste facilities, of the right type and in the right place to meet the needs of north London Borough's to 2032.

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<sup>32</sup> Mayor of London (2011) Making Business Sense of Waste: The Mayor's Business Waste Management Strategy, November 2011.

<sup>33</sup> Mayor of London (2011) Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaptation Strategy, October 2011.

<sup>34</sup> Mayor of London (2011), Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, October 2011.

<sup>35</sup> Mayor of London (2014) Mayor's Sustainable Design and Construction Supplementary Planning Guidance, April 2014.

<sup>36</sup> Mayor of London (2013) f. Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy – SPG, April 2013.

<sup>37</sup> Mayor of London (2010) Mayor's Transport Strategy, May 2010.

<sup>38</sup> Mayor of London (2010) Mayor's Air Quality Strategy, December 2010.

<sup>39</sup> Mayor of London (2011) Securing London's Water Future: the Mayor's Water Strategy, October 2011.

<sup>40</sup> Mayor of London (2010) Mayor's Economic Development Strategy for London, May 2010.

- 5.2.15 Edmonton EcoPark is safeguarded as an existing waste management site in draft Policy 1, and is identified in draft Policy 3, as suitable for new waste management development, with suitability for all types of waste management facilities.
- 5.2.16 The NLWP is not expected to be in a final or submission-ready form at the time of the examination. The Planning Act 2008 (as amended) does not include any specific guidance on the weight that will be placed on any draft plans/guidance and such decisions fall to the discretion of the Secretary of State.

### **Local policy context**

- 5.2.17 At the local level there are a number of key policy documents and policies which have informed the development of the Application, particularly the LB Enfield Local Plan, which comprises:
- a. the Enfield Plan Core Strategy 2010-2025: sets out the spatial framework for the long term development of the borough until 2025 and the aim of making it 'a prosperous and sustainable borough, with a strong sense of place and identity'.
  - b. the Development Management Document Supplementary Planning Document: provides detailed criteria and standard based policies for assessing planning applications.
- 5.2.18 Both documents set out a number of policies which relate to waste applications, and Edmonton EcoPark more specifically. Core Policy 22 Delivering Sustainable Waste Management relates particularly to the application, safeguarding existing waste management sites, but promoted their more efficient use, with potential for co-location of various waste uses.

### **Local planning designations**

- 5.2.19 A number of local planning designations apply to the Application Site. These are shown on the Enfield Adopted Local Plan Policies Map (November 2014) an extract of which is illustrated in Figure 3.1. The Edmonton EcoPark is allocated as Strategic Industrial Land and a small area in the north east corner is designated as a Site of Metropolitan Importance for Nature Conservation (SMINC). The wider Application Site is subject to a number of other allocations including:
- a. Green Belt;
  - b. SMINC; and
  - c. Lee Valley Regional Park.
- 5.2.20 The Edmonton EcoPark Planning Brief Supplementary Planning Document (SPD)<sup>41</sup> expands upon policies in the Local Plan and guides the future development of the site. There is no additional policy contained in Edmonton EcoPark SPD, but it does give detailed, site specific guidance on how to achieve the objectives set out in the Enfield Local Plan.

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<sup>41</sup> LB Enfield (2013) Edmonton EcoPark Planning Brief Supplementary Planning Document to the Local Plan, May 2013.

- 5.2.21 In addition, there are a number of additional local documents of relevance to the application, including:
- a. Proposed Submission Central Leaside Area Action Plan (published for consultation January 2015): within which Edmonton EcoPark is recognised as a preferred location for the management of north London's municipal waste and a potential energy from waste hub.
  - b. Meridian Water Masterplan (July 2013): covers the area of land to the south of the Application Site, proposing regeneration of this area to provide up to 5,000 new homes and 3,000 jobs by 2045.
  - c. Section 106 Supplementary Planning Document (November 2011)<sup>42</sup> and the emerging Revised Draft Section 106 (S106) Supplementary Planning Document (2015)<sup>43</sup>: sets out the requirements for S106 agreements in LB Enfield, including circumstances in which a S106 agreement is likely to be required; and details on the type and level of contribution necessary.

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<sup>42</sup> LB Enfield (2011) Section 106 Supplementary Planning Document, November 2011.

<sup>43</sup> LB Enfield (2015) Section 106 Revised Draft Supplementary Planning Document, 2015.

Edmonton EcoPark

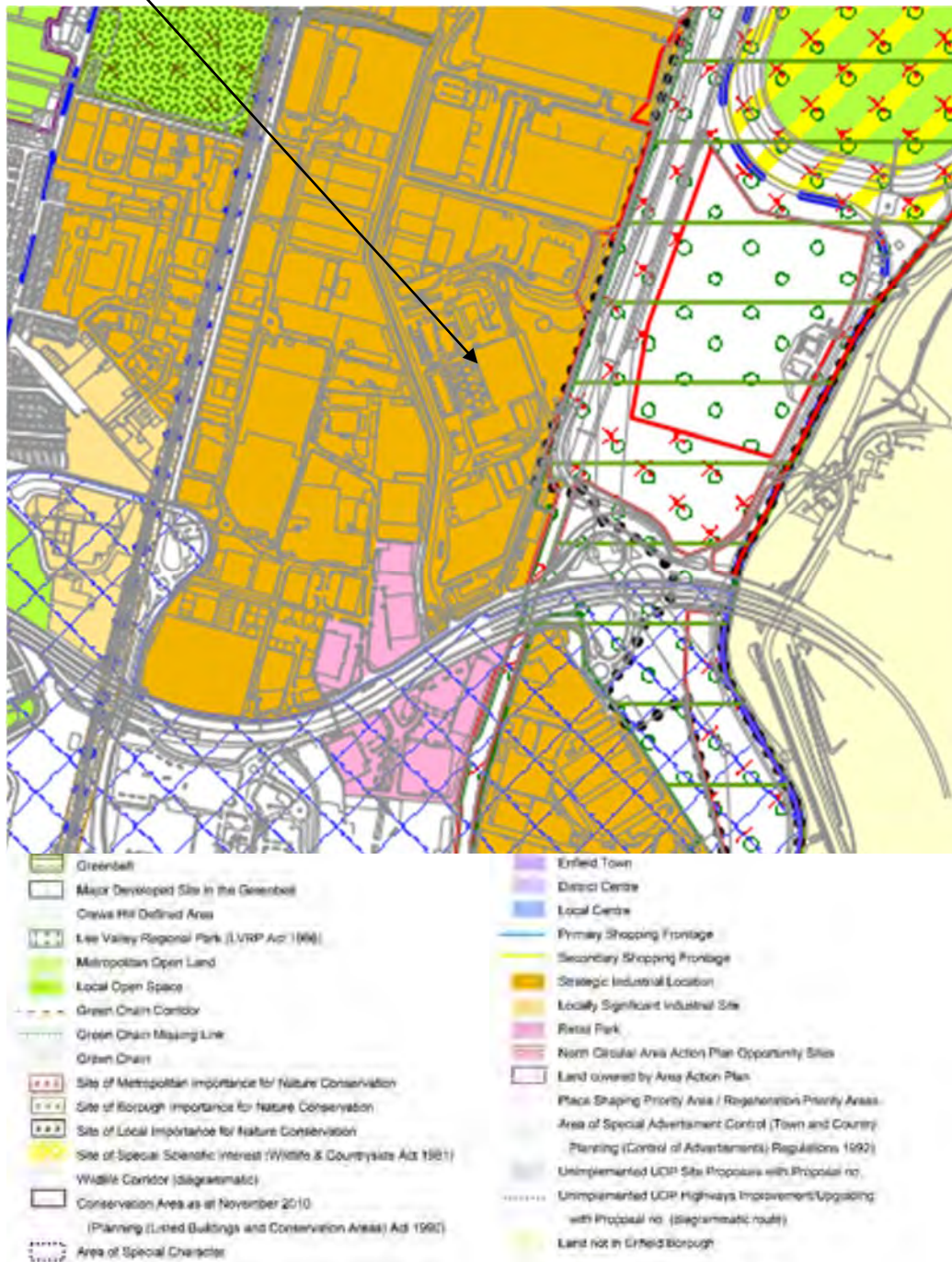


Figure 5.2: Planning Designations from Enfield Adopted Local Plan

- 5.2.22 Potable groundwater quality abstractions are located within 500m of the Application Site which is within the ground water Source Protection Zone (SPZ) source area for those abstractions. The majority of the Application Site is located within ground water SPZ 1 as designated by the EA, and the remainder of the Application Site is within ground water SPZ 2.

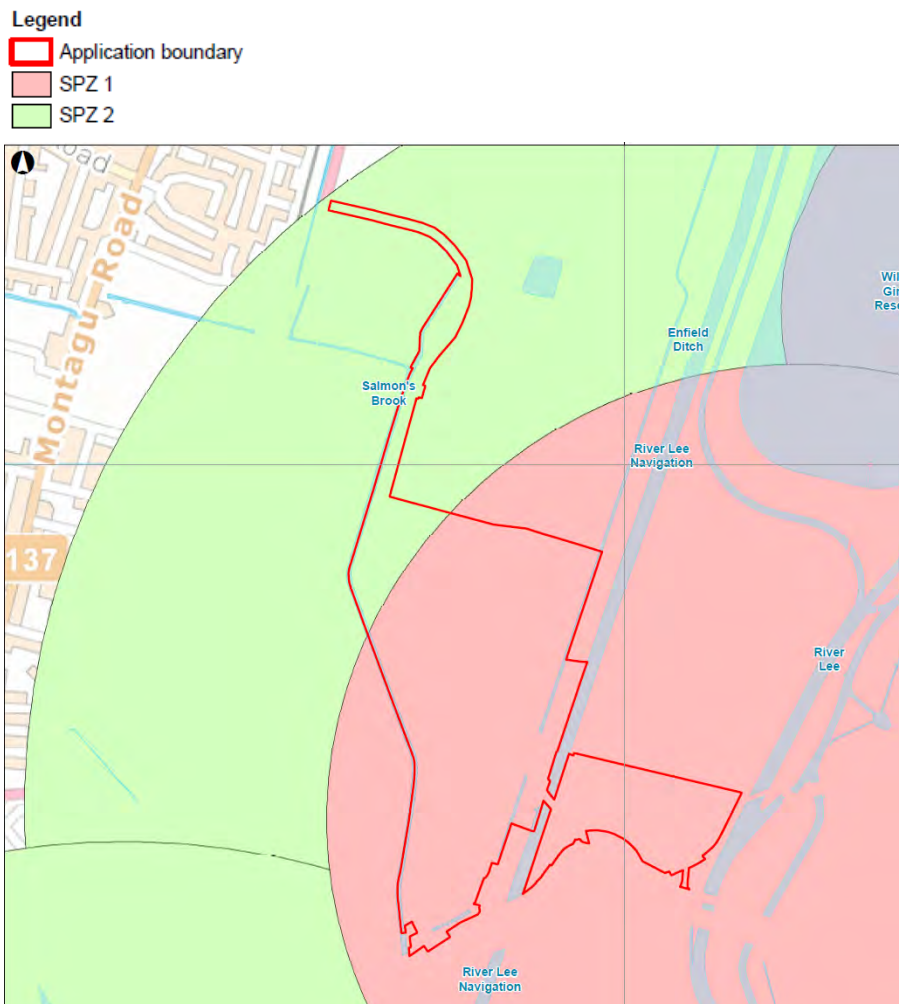


Figure 5.3: Source Protection Zones

### Considerations in adjoining boroughs

- 5.2.23 Whilst the Application does not include land within any adjoining boroughs, the Application Site is located close to the border with both LB Haringey and LB Waltham Forest. With regard to policy direction, the local plan visions, objectives and policies in both adjoining boroughs are broadly consistent with the policy context outlined by LB Enfield.
- 5.2.24 In looking at the impacts of the proposed development, and wider economic and demographic growth context the Application has taken into consideration future development and growth forecasts for these neighbouring borough's as well as LB Enfield.
- 5.2.25 In addition both LB Haringey and LB Waltham Forest have some Policy documents which provide the wider policy context surrounding the Application Site. These include:



- a. Tottenham Area Action Plan (Preferred Options, February 2015)<sup>44</sup>: covers the area of Haringey approximately 750m to the south of the application site;
- b. Waltham Forest Site Specific Allocations Preferred Options (2013)<sup>45</sup>: contains specific site allocations on land in close proximity to the site, including Chingford Mill Pumping Station on Lower Hall Lane (SSA17); and
- c. Waltham Forest Blackhorse Lane Area Action Plan (Adopted January 2015)<sup>46</sup>: The northernmost part of the Area Action Plan is located approximately 750m south east from the Application Site.

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<sup>44</sup> LB Haringey (2015) Tottenham Area Action Plan (Preferred Options), February 2015.

<sup>45</sup> LB Waltham Forest (2013) Waltham Forest Site Specific Allocations Preferred Options, July 2013.

<sup>46</sup> LB Waltham Forest (2015) Waltham Forest Blackhorse Lane Area Action Plan, January 2015.

## 6 Planning assessment

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### 6.1 Introduction

- 6.1.1 NPS EN-1 identifies a number of assessment principles and generic impacts which provide a helpful guide to the principal issues that the Planning Inspectorate is expected to take into account when determining the acceptability of a DCO application for an energy infrastructure project. NPS-EN3 identifies those impacts which are considered to be relevant to the determination of EfW proposals.
- 6.1.2 This section presents a topic-by-topic discussion of the potential impacts and mitigation measures associated with the Project to ensure conformity with the relevant NPSs and development plan.
- 6.1.3 Many of the topics covered in this section are subject to their own detailed assessments, as presented in other documents submitted as a part of the Application. The purpose of this section therefore, is to draw from those assessments and to consider their conclusions in the context of the planning policy tests set by the NPSs.

### 6.2 Energy and waste infrastructure

- 6.2.1 The principal element of the Project is the proposed ERF. This type of facility satisfies two functions:
- a. to contribute to the Government's recognised need for a diverse and secure energy supply, to increase renewable energy capacity and to reduce carbon dioxide emissions as set out in national policy (NPS EN-1, NPS EN-3, NPPF and Waste Management Plan for England) and regional policy (London Plan and the Mayor's Energy Strategy: Delivering London's Energy Future); and
  - b. to deliver part of the sustainable waste management infrastructure as set out in national policy (NPS EN-3, National Planning Policy for Waste, Waste Management Plan for England) and regional policy (London Plan, London's Municipal Waste Strategy and Draft NLWP).
- 6.2.2 A full assessment of the need for the Project is contained in the Need Assessment (AD05.04). The following text provides an overview.

#### Energy infrastructure

- 6.2.3 National policy demonstrates a need for new energy generating facilities to replace planned closures and to accommodate growing demand for energy in the future. This national need is replicated at a regional level by the desire to maintain and increase London's contribution to the national energy mix and thus replacement of the generating capacity provided by the existing EfW facility at the Edmonton EcoPark. The proposed ERF will contribute to the national and the local need for new generating facilities.
- 6.2.4 NPS EN-1 notes that to minimise risks to energy security and resilience, the Government believes it is prudent to plan for a minimum need of 59 Gigawatt of new electricity capacity by 2025 (Paragraph 3.3.23). The

Project would produce 70MWe and therefore make an important contribution in achieving this target. The ERF would produce significantly more electricity than existing EfW facility which produces approximately 40MWe.

- 6.2.5 NPS EN-1 recognises that the need for new energy infrastructure is urgent and suggests the Planning Inspectorate operate with a presumption in favour of granting development consent for energy NSIPs (Paragraph 4.1.2). This presumption in favour is said to apply unless it is clear that consent should be refused as a result of other more specific or relevant policies set out in NPSs.
- 6.2.6 London policy on energy emphasises the Mayor of London's aspiration for new low and zero carbon decentralised energy sources to meet London's energy needs in a sustainable way. It also emphasises the opportunity of major generating facilities to provide low carbon heat as well as power to local homes and businesses. The proposed ERF has the potential to make a significant contribution to London's decentralised energy targets through the capability of supplying heat via a heat network. Furthermore as a partially renewable energy source the proposed ERF can also contribute to the Mayor's aim to decarbonise energy generation.

### **Waste infrastructure**

- 6.2.7 At the regional level, the London Plan highlights the need to increase waste processing capacity in the capital and seeks opportunities to improve waste capacity. Policy 5.16 seeks to encourage the maximisation of benefits from waste processing, setting targets for 50 per cent of all domestic waste to be recycled/composted by 2020, and 60 per cent by 2031. The target is set at 70 per cent by 2020 for commercial and industrial waste. Policy 5.17 of the London Plan outlines the need to increase waste processing capacity in London, reiterating a commitment to identify opportunities for new waste capacity, including strategically important sites for waste management and treatment, and resource recovery works.
- 6.2.8 The Applicants' waste forecasting model provides an estimate of the amount of residual waste collected by the Constituent Boroughs that will require treatment in the proposed ERF through to 2050/51 based on a range of recycling rate scenarios. In order to model the need for capacity to treat residual waste in the future, assumptions regarding a continuation of recent trends in waste prevention and minimisation are built in to the waste forecast model, as detailed in the Need Assessment (AD05.04). In addition the achievement of a wide range of targets for the rate of reuse, recycling and composting have been modelled. This contributes to a forecast range of the amount of residual waste remaining to be treated with the planned ERF through to 2050-51.
- 6.2.9 In 2012/13 NLWA reused, recycled or composted around 32 per cent of total LACW. The recycling rate has increased from 23 per cent in 2006/07. However, for an urban, densely populated area such as north London, it will be challenging to replicate such a large increase in recycling rates going forward.

- 6.2.10 The NLWA has a target to achieve a 50 per cent household recycling rate and to reduce the amount of biodegradable waste sent to landfill to 35 per cent (of 1995 amounts) by 2020. The 50 per cent household recycling rate target was included within the recycling rate scenarios within the waste forecasting model identifying expected future tonnage of residual waste
- 6.2.11 In addition to the waste forecasting work, the proposed sizing of the Project is informed by a number of important influencing factors including the financial and operational risks to the NLWA 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 seasonal variations in waste arisings and as such the facility is designed to manage these fluctuations.
- 6.2.12 If the application to obtain a DCO were unsuccessful, the Applicant would have insufficient capacity to manage the projected residual LACW once the existing EfW facility has reached the end of its operational life; the proposed ERF will support the diversion of residual waste away from landfill in line with local, regional and national policy and in line with the waste hierarchy.
- 6.2.13 The ERF has been sized at the upper end of the forecast residual waste envelope predicted by each for the low, central and high recycling scenarios within the Applicants' waste forecasting model, to ensure that there is capacity to provide a local non-landfill solution for north London's residual waste, should the lower recycling forecast scenario be realised.
- 6.2.14 Should lower than forecast waste arisings occur and/or higher rates of reuse, recycling and composting be achieved, then other sources of residual waste could be available both from within the NLWA area and beyond to utilise any spare capacity in the ERF without this capacity acting as a barrier to continued efforts by the Applicant and its Constituent Boroughs to move the management of LACW further up the waste hierarchy.

#### **Use of Edmonton EcoPark for waste management**

- 6.2.15 Development at Edmonton EcoPark is strongly supported in both regional and local planning policy. Within the London Plan it is noted as the largest waste facility in London, with potential to provide heat and power to neighbouring development.
- 6.2.16 In the Upper Lee Valley Opportunity Area Planning Framework (OAPF)<sup>47</sup> the Edmonton EcoPark is sited as preferred location for a supply hub for the LVHN, with use being made of existing generating facilities. Chapter 5 of the OAPF sets out a preference for provision of an energy centre within the Edmonton EcoPark with the ability to operate top-up and standby steam boilers. Provision has been made for this infrastructure in drawing up the Project.
- 6.2.17 The OAPF safeguards Edmonton EcoPark for continued industrial employment use and aims to create better connections between industrial

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<sup>47</sup> GLA (2013) Upper Lee Valley Opportunity Area Planning Framework, July 2013.

sites and the LVRP and Banbury Reservoir. The Project proposes the continued use of the Edmonton EcoPark for waste management.

- 6.2.18 The Draft NLWP promotes the ongoing use of Edmonton EcoPark as a waste management facility. In addition, Policy 3 of the Draft NLWP identifies the Edmonton EcoPark within area A12-EN Eley's Estate, which is suitable for the development of new waste management facilities, of all types. Draft Policy 6 sets out assessment criteria for waste management facilities, including protecting residential amenity, controlling noise, managing transport effects, adapting to climate change and protecting biodiversity. The document also references a new ERF at Edmonton EcoPark as a strategic facility for north London. The Project would ensure the existing land use continues, and would provide the extra, much-needed waste capacity the Draft NLWP identifies as needed.
- 6.2.19 Local policies also seek to safeguard the use of Edmonton EcoPark for sustainable waste management. LB Enfield Core Policy 22 outlines the importance of retaining a strategic waste site at the Edmonton EcoPark. The Edmonton EcoPark Planning Brief SPD also provides support for the development of new waste management and other facilities on the site.
- 6.2.20 Furthermore, policy supports the redevelopment of Edmonton EcoPark to ensure it can incorporate more sustainable and efficient waste management processes, with specific support for the decommissioning of the existing waste incinerator. Policy CL22 of the Proposed Submission Central Leaside Area Action Plan (CLAAP)<sup>48</sup> also outlines support for the provision of improved waste treatment facilities to meet the needs of London residents.
- 6.2.21 The Project proposes the redevelopment of the Edmonton EcoPark to provide the next generation waste management facilities. The Project is therefore consistent with the ambitions of regional and local policies which seek to preserve and enhance the role of this strategic waste site.

### **6.3 Water quality and resources**

- 6.3.1 NPS EN-1 recognises that energy infrastructure proposals can potentially have adverse impacts on the water environment including groundwater, inland surface water, transitional waters and coastal waters. These can in turn lead to adverse health and ecological impacts for humans as well as protected species and their habitats. All proposals are required to include an assessment of their impact on the water environment as part of the ES. This assessment is expected to include information regarding all relevant discharges, abstractions, dynamics of flow and any proposed physical modifications to the water environment. These issues are addressed at Vol 2 Section 11 of the ES (AD06.01).
- 6.3.2 Policies 5.13 and 5.14 of the London Plan, and Policies 61, 62, 63 and 70 in LB Enfield's DMD and Core Policy 21 in LB Enfield's Core Strategy require developments to utilise Sustainable Drainage Systems (SuDS), ensure adequate wastewater infrastructure capacity, minimise use of water

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<sup>48</sup> LB Enfield (2015) Proposed Submission Central Leaside Area Action Plan, 2015

and improve water efficiency, manage surface water as close to the source as possible, protect and improve water courses and protect water quality.

- 6.3.3 The Edmonton EcoPark is located within a ground water SPZ. The Application Site is underlain by alluvium deposits overlying a relatively thin layer of London Clay at shallow depth, and the principal Chalk aquifer beneath that. The Project has been designed such that the integrity of the Clay aquiclude<sup>49</sup> will be retained (no breach of the clay layer), thus maintaining the existing protection provided to the underlying Chalk aquifer from any contamination present at the Edmonton EcoPark.
- 6.3.4 A new surface water drainage scheme would be implemented and run off would be contained within the on-site drainage system and discharged to Enfield Ditch at a regulated rate, which would be a betterment compared with the existing operation.
- 6.3.5 SuDS measures are set out in the Preliminary Surface Water Drainage Strategy, which is appended to the Flood Risk Assessment (FRA) (AD05.14). Measures include:
- a. rainwater harvesting used for toilet flushing in the administrative offices; vehicle washing; and for dust and fire suppression;
  - b. areas of green and brown roofs on the proposed ERF roof;
  - c. areas of green/brown roof on EcoPark House;
  - d. lined permeable paving in appropriate areas, such as general car parking areas and roads which will be frequented by light traffic;
  - e. lined filter trenches to treat surface water from hardstanding areas;
  - f. three separate attenuation tanks to provide the storage necessary to limit peak discharges to greenfield runoff rates; and
  - g. the Temporary Laydown Area to utilise swales and filter strips. It is thought that the Laydown Area would be created using permeable ground cover, such as MoT type 1 crushed gravel, which would allow rainwater to infiltrate.
- 6.3.6 Water course improvements would be introduced along Enfield Ditch including marginal planting and removal of invasive species and scrub so more light can penetrate.

## 6.4 Flood risk

- 6.4.1 NPS EN-1 states that the Planning Inspectorate should not consent development in Flood Zone 2 unless it is satisfied that the sequential test requirements have been met, and states that preference should be given to locating developments in Flood Zone 1. NPS EN-1 requires development in Flood Zone 2 and 3 to be accompanied by a FRA. The FRA should take into account all the potential risks posed by flooding (for the proposal) and demonstrate how these risks will be effectively managed and mitigated.

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<sup>49</sup> An impermeable layer of geology or bedrock through which groundwater does not flow.

- 6.4.2 NPPF Policy 10 requirements development to be focused in areas of low flood risk unless there are significant reasons otherwise and ensure that development is appropriately flood resilient and resistant. The NPPF sets out when the Sequential Test and Exception Test should be used. Policy 5.12 of the London Plan requires development to comply with the flood risk assessment and management requirements set out in the NPPF. At the local policy level Core Policy 28 requires suitable management of flood risk, Policy DMD 59 requires new development to mitigate the risk of flooding and not increase the risk of flooding elsewhere and Policy DMD 60 requires flood risk to be assessed.
- 6.4.3 Parts of the Application Site are in Flood Zone 2, these are in the centre of the Edmonton EcoPark where the existing EfW facility is located and along the southwest boundary adjacent to Salmon's Brook and on part of the wharf on the River Lee Navigation. Accordingly a FRA (AD05.14) has been undertaken for the Project which presents an assessment of potential flood risk to the Application Site from fluvial, tidal, groundwater, sewer and artificial sources (e.g. reservoirs) and overland flows. The FRA (AD05.14) confirms that the Application Site is potentially at risk of flooding from nearby watercourses.
- 6.4.4 No development is proposed on the site of the existing EfW facility as part of this Application. Following demolition of the existing EfW facility this part of the Edmonton EcoPark will be left clear and as such no development will be at risk of flooding in this part of the Edmonton EcoPark. This area has been considered as impermeable in the FRA.
- 6.4.5 The Edmonton Sea Cadets utilise a building located on the wharf in Flood Zone 2 and the construction of EcoPark House will result in a net additional increase of building footprint within the flood extent. This volume will be compensated for by profiling the west bank, on a level for level basis, of Enfield Ditch upstream of the wharf within the landscaped area on-site. This is shown on the Indicative Works: Cut and Fill Plan (D\_009).
- 6.4.6 Finished floor levels for EcoPark House will be set above the 100 year (1 per cent AEP) plus climate change defended flood level with a freeboard allowance of 0.3m; finished floor level will therefore be 11mAOD. There is a small area of land on the wharf which is in Flood Zone 3, but this is located outside the Application Site.
- 6.4.7 The Temporary Laydown Area is entirely within Flood Zone 2, with the exception of a narrow strip of land adjacent to the eastern boundary which is in Flood Zone 3. The proposed layout for the Temporary Laydown Area, is shown on Indicative Works: Temporary Laydown Area Plan (D\_0012). Temporary accommodation (site offices etc.) and storage of construction material would be located outside Flood Zone 3. Land within those extents is allocated to parking, landscape, and site access.
- 6.4.8 To mitigate against flood risk, the Temporary Laydown Area would be evacuated when a Flood Warning is received from the EA for the Lower River Lee at Enfield. This would reduce the risk of site occupants being 'islanded' by being surrounded by floodwaters on all sides, with the Application Site having been evacuated before this could occur. The system

for receiving flood warnings and evacuating the Laydown Area would be in place before the area is in use. The need for this Emergency Flood Plan during the construction stage is included within the CoCP (AD05.12).

- 6.4.9 The proposed development is appropriate for Flood Zone 2, since waste treatment is classed as Less Vulnerable to flood risk in the NPPF. As such the Exception Test does not need to be passed.
- 6.4.10 Part of the Application Site is also at residual risk from flooding in the event of flood defence failure in the upstream River Lee Navigation catchment. An Emergency Flood Plan will be included as part of the overall Edmonton EcoPark Emergency Plan.
- 6.4.11 LB Enfield's Policy DMD 61 requires all major developments to achieve greenfield run off rates (for 1 in 1 year and 1 in 100 year events). This is more stringent than the London Plan Sustainable Design and Construction Supplementary Planning Guidance (2014) and advice from the EA which both require runoff rates to be limited to three times the greenfield rate. Nevertheless, peak discharges will be limited to the greenfield runoff rate for all events up to and including the 1 in 100 year with climate change storm event.
- 6.4.12 The FRA (AD05.14) has concluded that groundwater is not a flood risk at the Application Site. The risk of flooding from surface water run-off is addressed through the site wide sustainable drainage strategy which includes green and brown roofs and rainwater harvesting as set out in the Preliminary Drainage Strategy, appended to the FRA (AD05.14).

## **6.5 Air quality, emissions, dust and odour**

- 6.5.1 NPS EN-1 requires that projects likely to have adverse effects on air quality to undertake an assessment of the impacts of the proposed project as part of the ES (AD06.01). NPS EN-1 requires the Planning Inspectorate to give air quality considerations substantial weight where a project could lead to a deterioration in air quality and take account of any relevant statutory air quality limits.
- 6.5.2 The London Plan includes Policy 7.14 to improve air quality and further guidance is set out in 'Cleaning the air: the Mayor's Air Quality Strategy'. Enfield's DMD also includes DMD 65 which requires any adverse effects on air quality to be mitigated. LB Enfield, LB Waltham Forest and LB Haringey have declared their whole boroughs as Air Quality Management Areas (AQMAs) in 2001 for exceedences of the annual mean NO<sub>2</sub> objective and 24-hour mean PM10 objective.
- 6.5.3 The Project has the potential to impact air quality and odour through construction and demolition emissions, and operational traffic, combustion source and fugitive emissions. A full assessment of potential air quality impacts has been undertaken in Vol 2 Section 2 of the ES (AD06.01). This concludes that the Project will not result in any significant effects in terms of air quality during construction or operation.
- 6.5.4 The proposed ERF has been designed to enable effective management of all emissions to air. The relevant measures, as outlined in Vol 2 Section 2



of the ES, have been developed in consultation with the EA. Details of engagement are set out in the Consultation Report (AD05.01).

- 6.5.5 Dust and PM10 concentrations on-site would be mitigated using best practice methods as set out in the CoCP (AD05.12).
- 6.5.6 The largest source of emissions associated with the Project is from the combustion stack associated with the proposed ERF. Wet or combined flue gas treatment mitigation technology is proposed. This would be combined with Selective Catalytic Reduction to reduce NO<sub>x</sub> emissions.
- 6.5.7 The ERF and RRF would have design controls in place to control odour, such as the tipping hall being under negative pressure, installation of odour control plant with a carbon filter and fast acting door shutter doors. With these types of measures it is considered that the Project would be equivalent to, or lead to an improvement in background odour in comparison to the existing EfW facility and IVC.
- 6.5.8 Furthermore, the ERF will be operated in accordance with the requirements of the Waste Incineration Directive (WID) (2010/75/EU)<sup>50</sup> and the Edmonton EcoPark would be subject to ongoing monitoring by the EA under an Environmental Permit.

## 6.6 Noise and vibration

- 6.6.1 NPS EN-1 recognises that excessive noise can have wide-ranging impacts on the quality of human life, health and use and enjoyment of areas such as quiet places and areas with high landscape quality. Where noise impacts are likely to arise from a development a noise assessment should be undertaken. NPS EN-3 also requires a noise assessment of the impacts on amenity in case of excessive noise from the Project.
- 6.6.2 Policy 7.15 of the London Plan supports the management and reduction of noise. At the local level Policy DMD 68 requires exposure to noise and noise generation to be minimised from all developments through design management and operation.
- 6.6.3 A full noise and vibration assessment has been undertaken and is set out in Vol 2 Section 8 of the ES (AD06.01). Noise and vibration effects on ecological receptors during construction and operation are assessed and reported in Vol 2 Section 5 of the ES (AD06.01). These assessments conclude that the potential noise and vibration effects of the Project are not significant during construction or operation.
- 6.6.4 During construction noise and vibration effects would be managed through measures set out in the CoCP (AD05.12) this includes specific measures to implement the recommendations of BS 5228-1:2009+A1:2014<sup>51</sup>. Also, as part of the Contractor's Construction Environmental Management Plan (CEMP), a noise and vibration management plan will be prepared and will set out the management and monitoring processes.

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<sup>50</sup> European Parliament and Council (2010) Waste Incineration Directive (Recast) (2010/75/EU), December 2010

<sup>51</sup> Code of practice for noise and vibration control on construction and open sites.

- 6.6.5 The design and control measures that would be used to limit operational noise from the proposed ERF and RRF (to be agreed and implemented through the Environmental Permitting process) would prevent significant effects in both EIA and policy terms. The design and control measures would also minimise any adverse effects, as far as it is reasonable to do so. Accordingly, the measures proposed to control operational industrial noise would meet the aims of national noise policy. Typical measures that could be implemented include, but are not limited to, selection of quiet plant, provision of sound attenuators, location of noisy plant at greatest distance from noise sensitive receptors.
- 6.6.6 Road traffic presents another potential source of noise during operation and construction. The percentage change in traffic flows across all Project stages on Meridian Way (the potentially worst affected road link based upon its proximity to residential receptors, combined with its distance from other major arterial roads such as the A406 which would dominate the noise climate) is less than 25 per cent. The resulting increases in traffic noise would therefore be less than 1 Decibel(A), which is considered to be negligible and not perceptible according to the DMRB methodology<sup>52</sup> used in the EIA.

## **6.7 Biodiversity and geological conservation**

- 6.7.1 NPS EN-1 states that as a general principle, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives; where significant harm cannot be avoided, then appropriate compensation measures should be sought.
- 6.7.2 Policy 11 of the NPPF requires development to conserve and enhance the natural environment. The London Plan Policy 7.19 requires development to make a positive contribution to the protection, enhancement, creation and management of biodiversity. Core Policy 36 requires LB Enfield's biodiversity interests to be protected, enhanced, restored or supplemented and Policies DMD 75 to 81 require any potential adverse impacts on ecological assets to be mitigated and ecological enhancements to be provided on-site. Both regional and local policy require the protection of trees and woodlands.
- 6.7.3 In accordance with NPS EN-1, Vol 2 Section 5 of the ES (AD06.02) assesses effects on the internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity.
- 6.7.4 There are sites designated under the Conservation of Habitats and Species Regulations 2010 (as amended) ('European sites') near to the Application Site and therefore screening for Habitats Regulations Assessment (HRA) is also required. A No Significant Effects Report (AD05.17) is submitted with

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<sup>52</sup> Highways Agency et al. (2011) DMRB, HD213/11

the Application, this concludes that there are no significant effects of the Project on European sites.

- 6.7.5 There are no statutory designated nature conservation sites within the Application Site.
- 6.7.6 There are two internationally designated sites within 10km of the Application Site; Lee Valley Special Protection Area and Ramsar Site (approximately 1.3km to the south) and Epping Forest Special Area of Conservation (SAC) (approximately 2.8km to the east). The ES (AD06.02) concludes that these are sufficiently far from the Application Site to be affected during construction and during operation deposition rates for particulate matter and nitrogen would decrease as a result of the Project.
- 6.7.7 Nationally designated sites within the vicinity of the Application Site include Chingford Reservoirs Site of Special Scientific Interest (SSSI) (240m to the north east) and Walthamstow Reservoirs SSSI (1.3km to the south). The majority of Epping Forest SSSI is also designated as a SAC. The ES (AD06.02) concludes there will be no significant effects on these sites.
- 6.7.8 At the local level the Lea Valley SMINC is located partly within the Application Site mainly comprising scrub and species-poor grassland associated with the Temporary Laydown Area, although there is also an area of plantation woodland, Enfield Ditch and habitats along Lee Park Way. Less than 0.5 per cent of the total area of the SMINC falls within the Application Site. The SMINC is designated due to the presence of particular species and habitats, such as wintering wildfowl, however the area of the SMINC within the Application Site does not contain these species or habitats.
- 6.7.9 The area either side of Lee Park Way falls within the SMINC, this area will be subject to habitat improvements in accordance with the landscape strategy. A small part (0.11ha) of the SMINC in the north east corner of the Edmonton EcoPark will be permanently lost to hardstanding as it is located under the proposed ERF ramp, new entrance or new path alongside Lee Park Way. However, the ES (AD06.02) considers this loss to be offset by the enhancement of habitats along Lee Park Way and along Enfield Ditch. Landscaping proposed within the SMINC includes creation of wildflower meadows within the Temporary Laydown Area, selective scrub removal and wildflower meadow creation along Lee Park Way and Enfield Ditch and marginal plug planting along Enfield Ditch. Landscaping proposals are shown on the Indicative works: Soft and hard landscape works (D\_007) and Indicative works: Landscaping types (D\_008) Plans and further information is set out in the Design and Access Statement (AD05.07).
- 6.7.10 The existing Edmonton EcoPark site is dominated by hardstanding and buildings associated with the existing facilities and extensive ecological surveys have not identified protected species on the site.
- 6.7.11 Ecology measures have been embedded into the Project including replacement and enhancement of existing habitats at the Application Site along with the creation of new habitats. This includes sowing of native wildflower meadow mix along Salmon's Brook, sowing of wildflower meadow mixes and plug planting of native aquatic and marginal plants

along Enfield Ditch, green and brown roofs on the proposed ERF, retention of selected mature trees along Lee Park Way, bird and bat boxes on mature trees and enhancement planting of native species. Across the Application Site both during construction and operation lighting would be minimised. Artificial external lighting would be at the minimum luminosity necessary and use low energy consumption fittings. No operational lighting is proposed within the Lea Valley SMINC with the exception of Lee Park Way and lighting would be designed to avoid spill onto the River Lee Navigation.

## 6.8 Landscape and visual impacts

- 6.8.1 NPS EN-1 identifies that the landscape and visual effects of new energy infrastructure plants will vary according to the type of development, its location and the landscape setting surrounding the proposal site. Therefore all proposals are to include a landscape and visual assessment as part of the ES (AD06.01). Impact of the development on the surrounding landscape character both during and after construction is a key consideration. Sufficient importance should also be given to the overall visibility of the development and the related visual amenity. Similarly Section 2.5.48 of NPS EN-3 requires an assessment of the landscape and visual effects of the proposed infrastructure.
- 6.8.2 The London Plan includes Policies 2.18 supporting the incorporation of green infrastructure in proposals, Policy 5.11 supporting the use of green roofs and 7.4 requiring proposals to integrate with the existing area. The need for development to be sympathetic to local landscape character is also highlighted in a number of LB Enfield policies including Core Policies 33 to 36 and Policies DMD 75 to 81.
- 6.8.3 A landscape and visual impact assessment has been included in Vol 3 of the ES (AD06.01). This concludes that there would be some moderate adverse effects in terms of visual impact during construction and decommissioning but no significant effects are anticipated during operation.
- 6.8.4 It is not possible to completely screen the scale and bulk of the Project and therefore some visual effects are inevitable. However the proposals have been carefully designed to reduce visual effects as far as practicable with suitable measures integrated into the scheme and the CoCP (AD05.12) to reduce some effects during construction.
- 6.8.5 The landscape strategy, as set out in the Design and Access Statement (AD05.07) has two main aims: to create a high quality landscape that maximises ecological enhancement and sustainable water management and to create a scheme that integrates with the wider landscape character. The high quality of the overall design has been developed to make a positive contribution to the townscape of this part of London.
- 6.8.6 The following design measures have been incorporated to respond to the surrounding context and minimise the visual impact of the proposed ERF from the LVRP:
- a. the scale of the ERF stepping down towards LRVP;

- b. earth bank along the eastern side of the proposed ERF to visually reduce the height of the building and enable tree planting to screen the new facility;
- c. rectangular shape of the stack with the shorter sides facing visual receptors to the east and west;
- d. the lighter colour material of the stack, which would help the stack to blend in with the sky;
- e. the location of the stack at the western end of the proposed ERF means this part of the plant would be situated towards the industrial area;
- f. use of contrasting material and various building block heights to break up the mass of the ERF building;
- g. contrasting building colour for the plinth and upper building façade to help breaking up the mass of the building and to blend the development into its surroundings. The darker colour plinth as seen against ground and the lighter colour upper façade as seen against the sky;
- h. the soft landscaping has been designed to promote biodiversity and to utilise locally appropriate native species to enhance existing and replacement habitat. A green roof and a brown roof are proposed on part of the ERF building providing new habitats; and
- i. new tree planting has been proposed to the east of the proposed ERF building to replace trees lost to the development and provide some filtering of views of the lower levels of the ERF from the east.

## 6.9 Historic environment

- 6.9.1 NPS EN-1 recognises that the construction, operation and decommissioning of an energy infrastructure plant can potentially lead to adverse impacts on the historic environment near the site. Therefore, it requires all proposals to include an assessment of their impact on the historic environment. It also encourages new proposals to preserve key elements of the historic environment and to include strategies to enhance their significance.
- 6.9.2 Policy 7.8 in the London Plan requires development to “*identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate*”. Similarly Core Policy 31 seeks to preserve and enhance heritage assets in the borough, and this is echoed in Policy DMD 44 relating to conserving and enhancing heritage assets.
- 6.9.3 The Edmonton EcoPark is not designated for heritage reasons and there are no known finds of archaeological artefacts or monuments within the Application Site. However the Project sits within the floodplain of the River Lea, historically a regularly inundated area, suggesting a potential for archaeological remains.
- 6.9.4 Built heritage has been scoped out of the ES (AD06.02) by the SoS as the Project is not likely to have any significant effects. Given the lack of heritage assets in and around the Application Site, and the lack of effects on

heritage, the Project is considered to conform with historic environment policies.

- 6.9.5 An assessment of the likely significant effects of the Project on below ground archaeological remains is set out in Vol 2 Section 3 of the ES (AD06.01). This concludes that the Project will not have any significant effects in respect of archaeological assets.

## 6.10 Green Belt

- 6.10.1 NPS EN-1 recognises that an energy infrastructure project will have direct effects on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. Given the likely locations of energy infrastructure projects there may be particular effects on open space including green infrastructure.
- 6.10.2 NPS EN-1 establishes “*a general presumption against inappropriate development*” in the Green Belt and states that any energy projects in the Green Belt will not be approved except in “*very special circumstances*”. These very special circumstances will not exist unless the benefits of the project and its other considerations outweigh the potential harm to the Green Belt.
- 6.10.3 The requirements of NPS EN-1 are echoed in Paragraph 58 of the NPPF which states that any development which is harmful to the Green Belt is considered to be inappropriate and will not be approved except in “*very special circumstances*”. Such circumstances will only be permitted should the potential harm to the Green Belt be outweighed by “*other considerations*”.
- 6.10.4 The NPPF notes that when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources (Paragraph 91).
- 6.10.5 Policy 7.16 of London Plan provides London’s Green Belt with the “*strongest protection*” in accordance with guidance in national policy. This policy seeks to protect the Green Belt from inappropriate development and supports the refusal of any “*inappropriate development*”, except in very special circumstances. The policy states that appropriate development will be supported, if it contributes to securing the objectives of improving the Green Belt as set out in national guidance.
- 6.10.6 LB Enfield’s Core Policy 33 sets out the Council’s goal to continue to protect and enhance LB Enfield’s Green Belt. Policy DMD Policy 82 provides that any development considered inappropriate will not be permitted within LB Enfield’s Green Belt. Development which is considered not to be inappropriate will be permitted if the following requirements are met:

- a. proposed development is of a 'siting, scale, height and bulk' which contributes and is complementary to preserving the openness of the Green Belt;
- b. high quality design and landscaping are proposed for the development, minimising any adverse visual impacts upon the green belt, particularly with regard to site contours;
- c. proposed development harmonises with natural features of the greenbelt, through the use of appropriate finish and colour;
- d. the retention of existing trees and other natural features will be ensured where possible, and where not possible adequate mitigation measures must be proposed before permission will be granted; and
- e. development should provide 'appropriate parking provision, safe access, egress and landscaping' to make sure that development does not compromise the Green Belt's openness.

6.10.7 The Green Belt runs directly adjacent to the existing Edmonton EcoPark, along its eastern edge. Principal works do not fall within Green Belt land however some associated development, namely part of a new site access off the existing Lee Park Way (upgrading of an existing roadway), landscape enhancement works and the Temporary Laydown Area to the south of the Camden Plant Ltd. site, are proposed in the Green Belt.

6.10.8 The NPPF notes a number of exceptions where development in Green Belt is not considered to be inappropriate development, including replacement buildings and extensions or alterations to buildings. Whilst the works proposed as part of the Project do not fall within these exceptions the works to Lee Park Way are to an existing structure and as such fall within the spirit of these exceptions.

6.10.9 It is considered that the associated development proposed within the Green Belt for this Application constitutes 'very special circumstances' as described in NPS EN-1 and the NPPF because there is overwhelming need for the Project and the benefits provided by the Project outweigh any impacts upon the Green Belt.

6.10.10 The case for new energy generating facilities to replace planned closures and to accommodate growing demand for energy in the future is well documented in national policy. The Project will play an important role in meeting this need, and this is set out in the Need Assessment (AD05.04) In addition to the need for new energy infrastructure, the Project will also meet the need for waste management capacity. The Applicant has a statutory duty to arrange for the disposal of waste from seven north London boroughs. The ERF is needed to ensure that there is sufficient capacity to manage the forecast waste arisings once the existing EfW facility has reached the end of its operational life.

6.10.11 The works which are proposed in the Green Belt are essential to the delivery of the proposed ERF. The Temporary Laydown Area is needed to construct the ERF. The existing EfW facility must remain operational throughout the construction period. Continued operation of the existing EfW facility requires some of the activities currently taking place in the north of

the Edmonton EcoPark to be relocated to the proposed RRF prior to the construction of the proposed ERF. This means that there is not sufficient space within the Edmonton EcoPark to accommodate a construction compound of sufficient size. It is therefore necessary to accommodate a Temporary Laydown Area outside the Edmonton EcoPark but within proximity.

- 6.10.12 The key criteria for the Temporary Laydown Area are sufficient size (3.3 hectares), proximity to the Edmonton EcoPark and reasonable accessibility for construction staff and traffic. It is proposed that construction staff will be transported directly from the Temporary Laydown Area along Lee Park Way into the Edmonton EcoPark making the journey a short and efficient one. The journey for construction traffic will be along the A406 North Circular Road for a short distance and via the A1005 Meridian Way and the north entrance to the Edmonton EcoPark (Deephams Farm Road).
- 6.10.13 The proposed site of the Temporary Laydown Area is the only suitable site within proximity. The Temporary Laydown Area is currently inaccessible to the public and surveys have not identified any ecological features of note.
- 6.10.14 The new eastern access from Lee Park Way is necessary to provide a safe public access to the Edmonton EcoPark for members of the public visiting the RRF. The new eastern access enables the public to be separated from operational vehicles associated with the Edmonton EcoPark.
- 6.10.15 The works within the Green Belt have been designed to minimise potential impacts as far as possible. All works are either temporary or comprise works to existing infrastructure and no new buildings are proposed in the Green Belt.
- 6.10.16 The Temporary Laydown Area is a temporary feature which will be operational for the duration of construction and demolition of the existing EfW facility only, a period of approximately five years, after which this land will be returned to its original state. When construction and demolition is complete the Draft DCO (AD03.01) requires the Temporary Laydown Area to be reinstated to its former condition, or such other reasonable and proportionate condition as LB Enfield may approve.
- 6.10.17 The landscaping strategy has been designed to enhance views of the Edmonton EcoPark from the Green Belt, for example through marginal planting along Enfield Ditch and the stepping down of the proposed ERF towards the Green Belt. Such measures are set out in Paragraph 6.8.6. These measure help retain the openness of the Green Belt.

## **6.11 Traffic and transport**

- 6.11.1 NPS EN-1 recognises that a new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Planning Inspectorate should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction stage of the development. NPS EN-1 requires any project likely to have significant transport implications, to provide a transport assessment as part of the ES.



- 6.11.2 NPS EN-1 also states that where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts.
- 6.11.3 NPS EN-1 also states that water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.
- 6.11.4 Paragraph 35 of the NPPF states that development should be located and designed where practical to accommodate efficient delivery of goods and supplies, give priorities to pedestrians and cyclists, create safe and secure layouts, incorporate facilities for charging plug-in and consider the needs of people with disabilities. The London Plan includes similar policy requirements, Policy 6.3 states that development proposals should ensure that impacts on transport capacity and the transport network are fully assessed. Policies 6.9 and 6.10 seek to increase cycling and walking respectively and Policy 6.13 seeks to prevent excessive car parking provision.
- 6.11.5 At the local level Core Policies 24 to 27 and Policy DMD 47 also seek to encourage sustainable travel choices and improve the environment for pedestrians and cyclists. Policy DMD 45 sets out parking standards,
- 6.11.6 The Application Site is in the vicinity of the A406 North Circular Road, a Transport for London Road Network road and identified in the London Plan as a key route for the movement of freight.
- 6.11.7 A TA (AD05.11) has been prepared which considers the effects of the Project during construction, operation and demolition on road users, public transport users, pedestrians and cyclists. A detailed assessment of the junctions in the immediate vicinity of the Application Site has been undertaken. The assessment takes into consideration other proposed developments in the vicinity of the Application Site.
- 6.11.8 The TA (AD05.11) concludes that for construction, operation and demolition the additional traffic generated by the Project will not result in any significant increase on the local highway network and only minor increases and, in some time periods, decreases in the traffic flows on the A406 North Circular Road and other key routes. During operation it is estimated that the Project will generate 175 two-way additional (net) vehicle trips. The largest increase in trips will be experienced between 11:00 and 12:00 (52 trips) when the Edmonton EcoPark activity is at its peak. The largest increase in traffic flows would be experienced on Advent Way, leading to and from the southern site access as well for public/employee traffic using Lee Park Way. However, the increase in traffic flows would be less than 10 per cent and would not have a material effect on the operation of Advent Way.
- 6.11.9 The Assessment also finds that the additional public transport trips would be accommodated without affecting capacity on public transport services.
- 6.11.10 Cycle parking is proposed in line with the London Plan requirements. The Project is also supported by the Framework Operational and Construction Travel Plans which promote the use of sustainable modes of transport through a range of soft measures including the provision of public transport shuttle services, the provision of cycle parking and the promotion of car sharing.

- 6.11.11 During construction, up to 225 parking spaces for construction employees and 45 spaces for larger vehicles would be provided at the Temporary Laydown Area. The peak number of construction workers on the Application Site at any day is estimated to be 550, and the TA assumes that approximately 50 per cent of these will drive to the Application Site. The Construction Travel Plan proposes additional measures to reduce the number of trips by car.
- 6.11.12 During operation 128 car parking spaces would be provided at the Edmonton EcoPark. The level of operational parking spaces exceeds the London Plan requirements because the Application Site is located close to the Strategic Road Network and in an area with 'very poor' Public Transport Accessibility Level (PTAL) and limited public transport services. The Project will operate 24 hours using shift working patterns and public transport will not be operating when some shifts start or finish. There are also limited walking and cycling routes in the vicinity of the Application Site. The level of parking proposed is therefore appropriate for the nature of the Project and its location.
- 6.11.13 As part of the Project vehicular access along Lee Park Way will be introduced (currently this route is only accessible to cyclists, pedestrians and maintenance vehicles). Only vehicles visiting the RRC or EcoPark House will use this route and as such the volume of traffic is expected to be low. The environment for pedestrians and cyclists along Lee Park Way will be improved as part of the Project by upgrading the existing roadway and providing a footpath and cycle lane.
- 6.11.14 A Water Transport Study has been undertaken to establish the viability of transporting Incinerator Bottom Ash (IBA) from and MSW to the Edmonton EcoPark. A copy of the study is included in Appendix I of the TA (AD055.11). The Study concludes that while the transport of IBA and MSW by water would have environmental benefits, the overall cost of transporting IBA and/or MSW via the waterways would be substantially more expensive than road transport and without significant investment in the waterways would not be feasible water transport is therefore not included as a part of the proposals.
- 6.11.15 In respect of the transport of demolition waste and construction materials, the TA (AD05.11) concludes that delivery of material by water is unlikely to be cost effective or practical. The construction of EcoPark House is required during the initial construction stage for a number of practical reasons including to re-house the Edmonton Sea Cadets and accommodate new IT server systems. EcoPark House is located on the wharf, meaning that the wharf would not be available to be used for water transport for the majority of the construction period.

## **6.12 Project waste management**

- 6.12.1 NPS EN-1 identifies that all large infrastructure projects are likely to generate hazardous and non-hazardous waste. Therefore all proposals should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. NPS EN-1 states

that the applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.

- 6.12.2 Enfield Policy DMD 57 requires all major developments to submit a Site Waste Management Plan which details how waste from construction will be minimised in line with the waste hierarchy: reduce; reuse; recycle; recover. The policy requires that development must divert a minimum of 85 per cent of non-hazardous waste from landfill with a strategic objective of 95 per cent of waste by 2020. In addition, the policy requires applicants to submit a Green Procurement and Construction Plan which sets out how the development has minimised its environmental impacts through local procurement, responsible sourcing and minimised waste.
- 6.12.3 Waste management during operation was scoped out of the ES by the SoS in the Planning Inspectorate Scoping Opinion (November 2014).
- 6.12.4 A CoCP (AD05.12) has been produced, which incorporates requirements for a Site Waste Management Plan (SWMP) to be prepared by the contractor in accordance with the Waste and Resources Action Programme (WRAP). The SWMP will include information regarding the classification, type and quantities of waste to be produced and measures for reducing waste generation and for recycling and/or reuse.
- 6.12.5 Opportunities to reduce waste from construction have been incorporated into the design, for example the design minimises the volume of construction materials for the proposed ERF.
- 6.12.6 The CoCP (AD05.12) requires the contractor to implement the waste hierarchy to ensure that material resources are used to maximum efficiency. The Contractor will minimise the waste generated from their activities where reasonably practicable, this will include processes such as just-in-time delivery, consolidation centres for the storage of materials on-site and the use of pre-fabricated construction components. Where prevention of waste is not possible, the Contractor will reduce the quantity of waste sent to landfill by maximising re-use, recycling and recovery.

## **6.13 Socio-economic**

- 6.13.1 NPS EN-1 recognises that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels and requires an assessment of those impacts where they are likely to occur. NPS EN-1 notes that creation of jobs and training opportunities, provision of educational and visitor facilities and impacts on tourism, local businesses and public rights of way could be key considerations. A description of the existing socio-economic conditions of the area and the Project's correlation to the aspirations of the local planning policies should also be covered in this assessment.
- 6.13.2 Edmonton EcoPark falls within the Upper Lee Valley Opportunity Area and Policy 2.13 of the London Plan requires development in Opportunity Areas to meet the general policy directions; for the Upper Lee Valley this includes creating an employment capacity of 15,000 jobs. In Enfield's Local Plan Core Policy 13 aims to protect and improve the employment offer, with a

minimum target of 6,000 new jobs between 2010 and 2026. Within Central Leaside there is a commitment to reversing the current trend of decreasing employment.

- 6.13.3 A Socio-Economic Impact Assessment has been included in Vol 2 Section 9 of the ES (AD06.02) this covers effects from construction, operation and decommissioning in respect of employment, including relevant opportunities for local people and the Edmonton Sea Cadets.
- 6.13.4 Details of jobs created during construction and operation are set out in Section 2.5 Site Operation of this document. Construction of the Project is expected to support a total of approximately 2,623 FTE net additional jobs across the UK comprising around 971 FTE net additional direct construction jobs and 1,651 FTE indirect and induced employment jobs.
- 6.13.5 Employment from operation is expected to support a total of approximately 229 FTEs in the UK of which 197 FTEs would be at the local level, of which 153 are direct operational jobs. This represents a net reduction of around 50 jobs at the local level due to the improved efficiency of the proposed ERF facilities compared to the existing EfW facility for example creating less maintenance requirements.
- 6.13.6 Commitments relating to local employment are included in the Section 106 Draft Agreement (AD03.03) submitted as a part of the Application.
- 6.13.7 A Community Liaison Group formed of local representatives and community groups would be set up and provide a forum for the local community to meet with the Applicant and contractor throughout the construction and demolition period.
- 6.13.8 During construction the Edmonton Sea Cadets would be relocated to EfW facility meeting rooms for a temporary period of approximately two years. Equipment would be stored in a container located at front of the EfW facility and boats would be relocated to alternative facility off-site temporarily. They will be able continue to function as usual for the majority of the construction period, with some disruption associated with requirements for water access for approximately two years. The Project would provide a modern and improved facility for the Edmonton Sea Cadets as part of EcoPark House. The ES (AD06.02) therefore considers the Project to have a beneficial effect on the Edmonton Sea Cadets.
- 6.13.9 The Project would also provide benefits to the community through the potential for community activities to take place in EcoPark House. Tours of the Edmonton EcoPark will continue to be offered. Landscaping along the eastern edge of the Application Site will create an improved visual impact for members of the local community using the LVRP, and this will be enhanced through the provision of new buildings of a high quality of design and removal of existing structures.
- 6.13.10 The Project includes a RRC which local businesses and the public will be able to bring their recycling and bulky items for disposal from 2021 onwards.
- 6.13.11 The Project would be heat enabled and the Applicant is progressing opportunities to provide heat to the LVHN. The provision of heat would

provide further benefits to the local community through cost savings and serving to displace fossil fuel use with a low carbon heat source.

6.13.12 The Project would not create any direct impact on population, or on required infrastructure provision such as school places or health care needs.

6.13.13 A Health Impact Assessment (AD05.09) has been undertaken to address human health concerns raised in the context of the Project. This assessment finds that overall the Project is likely to have beneficial health effects. There would be some negative effects during construction, primarily related to the loss, or perceived loss, of residential amenity, which concerns air quality, noise, traffic and visual impacts. However these would be offset through benefits during operation such as improved surfacing along footpaths and cycleways and improved community facilities in EcoPark House including the new base for the Edmonton Sea Cadets.

## 7 Overall planning balance and conclusions

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### 7.1 Statutory requirements

7.1.1 Section 104 of the Planning Act 2008 (as amended) requires the SoS to have regard to the following in determining DCO applications:

*“(a) any national policy statement which has effect in relation to development of the description to which the application relates (a ‘relevant national policy statement’),*

*(b) any local impact report (within the meaning given by section 60(3)) submitted to the Commission before the deadline specified in a notice under section 60(2),*

*(c) any matters prescribed in relation to development of the description to which the application relates, and*

*(d) any other matters which the Secretary of State thinks are both important and relevant to its decision.”*

7.1.2 The relevant NPSs are NPS EN-1 and NPS EN-3. The Project will play a key role in achieving the ambitions of these to meet energy security, reduce carbon emissions and replace closing electricity generating capacity.

7.1.3 The assessment principles in NPS EN-1 and policies in NPS EN-3 are of relevance to the determination of the Application. These have been discussed in the thematic sections earlier in this Statement and in more detail in relevant Application documents.

7.1.4 Given the level and urgency of need for infrastructure covered by NPS EN-1 the NPS states that the SoS should start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. In this case, assessment of the Project has not identified any overriding reasons which indicate that consent should be refused. Furthermore the Project is generally in conformity with all relevant NPS policies.

### 7.2 Summary of benefits and effects

7.2.1 As would be expected of any major development proposal there is potential for effects. The Project has been designed to minimise its impact, and where appropriate mitigation measures have been provided. However, overall the effects of the Project are significantly outweighed by the benefits that the Project would deliver.

7.2.2 In considering any proposed development, NPS EN-1 requires the SoS to weigh the potential adverse impacts against the potential benefits. A summary of benefits and effects is provided below.

7.2.3 The Project would create the following benefits:

- a. energy infrastructure – the Project would make a significant contribution to meeting the urgent need for new energy infrastructure;

- b. renewable energy –the Project would contribute to renewable energy generation<sup>53</sup>;
- c. climate change – the Project would reduce carbon dioxide equivalent (CO<sub>2eq</sub>) emissions by generating low carbon energy from waste;
- d. waste infrastructure – the Project would provide a long-term solution for the management of north London’s waste in accordance with the waste hierarchy, ensure there is sufficient capacity to manage the forecast waste arisings once the existing EfW facility has reached the end of its operational life, divert waste from landfill and enable the Applicant to fulfil its statutory waste disposal obligations;
- e. employment - employment from operation is expected to support a total of approximately 229 FTEs and construction of the Project is expected to support a total of approximately 2,623 FTE net additional jobs. The Applicant has set out in the Section 106 Draft Agreement (AD03.03) the proposed measures to promote training and local employment;
- f. heat – the Project would be CHP enabled, if connected to a district heating network, it would make a significant contribution to providing low carbon heat and contribute towards achieving the Mayor of London’s targets for decentralised energy;
- g. Edmonton Sea Cadets – the Project would provide a new purpose built facility for the Edmonton Sea Cadets with an access segregated from operational traffic;
- h. community and educational use – EcoPark House would include space to be used for community and educational purposes and the layout of the Edmonton EcoPark will provide safe and segregated areas for public tours and activities;
- i. RRC – the proposed RRC would be a facility for north London’s residents and businesses, and allow the treatment of household waste in accordance with the waste hierarchy;
- j. visual impact - the Project would improve the visual appearance of the Edmonton EcoPark by replacing the existing EfW facility with new high quality buildings and landscaping;
- k. pedestrians and cyclists – the Project would improve the environment for pedestrians and cyclists along Lee Park Way by upgrading the existing roadway and adding a dedicated footpath and cycle lane;
- l. ecology – the creation of new habitats and enhancement of existing habitats, particularly along Lee Park Way, will have a positive effect on the ecological value of this area;
- m. drainage – peak discharges from the Edmonton EcoPark will be limited to greenfield runoff rates, which is an improvement compared to the

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<sup>53</sup> Around 60 per cent of the municipal waste stream could be considered as biogenic in origin and hence contributes to renewable energy generation, refer to the Need Case (AD05.04) for further information.

existing situation and would result in a reduction in fluvial flood risk downstream;

- n. air quality – the proposed ERF includes Selective Catalytic Reduction treatment technology which will achieve a nitrogen oxide emission level of less than half the permissible level and represents an improvement in emissions from the existing EfW facility;
- o. sustainability – the Project would achieve BREEAM ‘very good’ rating as a minimum and incorporates several exemplary sustainable design measures such as green/brown roofs and rainwater harvesting;
- p. rationalise the Edmonton EcoPark – by improving the facilities on-site needed for management of residual waste and creating separate public and operational zones;
- q. active management of Lee Park Way – create a new entrance to the Edmonton EcoPark enabling the better management of Lee Park Way, provide improved landscaping management and improved safety and security for users; and
- r. demolition of the existing EfW facility – the Project secures the demolition and decontamination of the existing EfW facility when it reaches the end of its operational life.

7.2.4 The Project would also result in the following effects:

- a. reconfiguring habitat – a small area of the Lea Valley SMINC will be cleared and have a footpath and maintenance access added. However these works are offset by the enhancement of habitats along Lee Park Way. Landscaping proposed elsewhere within the SMINC which falls within the Application Site includes creation of wildflower meadows within the Temporary Laydown Area, selective scrub removal and wildflower meadow creation along Lee Park Way and Enfield Ditch and marginal plug planting along Enfield Ditch;
- b. temporary use of LVRP for the Temporary Laydown Area – the temporary use of the LVRP for the Temporary Laydown Area could be perceived as creating a loss of open space and being an inappropriate use of the Green Belt. The site on which the Temporary Laydown Area would be located does not have public access. As such there would not be any loss of publically accessible open space. As described in Section 6.10 there are very special circumstances which justify the temporary use of the Green Belt for this purpose. The size of the Temporary Laydown Area has been minimised and enhanced landscaping would be provided in the vicinity of the Temporary Laydown Area along Lee Park Way once the construction works were complete and the area will be reinstated;
- c. minor works in the Green Belt – in addition to the Temporary Laydown Area, minor works to create the new access from Lee Park Way are proposed in the Green Belt. The works to Lee Park Way are to an existing road in the Green Belt and are minor. The works are necessary to provide a safe access to the Edmonton EcoPark for members of the public and staff visiting the RRF and EcoPark House. As part of these



works access along Lee Park Way will be improved for pedestrians and cyclists as part of the Project;

- d. temporary visual impact – there would be a temporary adverse visual effect whilst the proposed ERF is constructed and during the demolition of the existing EfW facility. However this would be limited to the construction/demolition period and in the long term the ERF would have a higher quality appearance than the existing EfW facility; and
- e. increase in scale of buildings on the Edmonton EcoPark – the proposed ERF will be larger than the existing EfW facility. The scale of the ERF is determined by its internal activities and the size of the plant technology. The scale and mass of the building has been reduced as far as possible through the design and through the use of colours and materials, as set out in the Design Code Principles (AD02.02). The visual impact of the ERF has been reduced from the LVRP by stepping back the massing and through landscaping.

### **7.3 Obligations and requirements**

- 7.3.1 A systematic and comprehensive approach has been taken to address all potential impacts of the Project, to limit them where possible and to mitigate them when significant residual impacts remain.
- 7.3.2 The approach taken to mitigation is in accordance with the policy approach set out in NPS EN-1 and has been developed based upon consultation with stakeholders and the outcome of the assessments undertaken to inform the Application.
- 7.3.3 Wherever possible measures to reduce the effects of the Project have been incorporated into the design, for example habitat creation and enhancement is proposed to mitigate for the small loss of habitat.
- 7.3.4 Mitigation measures which are not incorporated in the design are set out in Application documents and, where appropriate, incorporated into the Draft DCO (AD03.01). For example the CoCP (AD05.12) incorporates measures to reduce the impact of construction and the Draft DCO (AD03.01) requires that the CoCP (AD05.12) is adhered to.
- 7.3.5 Overall the Project would create only a limited number of adverse effects. These are summarised in the ES (AD06.02) as follows:
  - a. significant adverse impact due to windiness at the south east corner of the proposed ERF; and
  - b. significant adverse visual impact during construction and decommissioning works.
- 7.3.6 Where the ES (AD06.02) has identified that the Project is likely to have significant adverse effects which cannot be addressed through the design, where practicable, further measures to have been incorporated into the Draft DCO (AD03.01).
- 7.3.7 In the case of windiness at the south east corner of the proposed ERF, the Draft DCO (AD03.01) states that the results of the wind assessment shall be taken into account during detailed design and mitigation provided as

appropriate. For example this could be addressed through the addition of screening or canopies.

- 7.3.8 In respect of the adverse visual impact it is not possible to provide supplementary mitigation to lessen the impact. However this is a temporary impact and in the longer term the Project will improve the visual appearance of the Edmonton EcoPark.
- 7.3.9 Similarly, it is not possible to mitigate for the adverse impact of reduced water availability in Salmon's Brook.
- 7.3.10 In addition, the opportunity has been taken to propose commitments in the Section 106 Draft Agreement (AD03.03) to a series of beneficial measures which are not principally designed to mitigate impacts but which are appropriate to deliver the Applicant's overall ambitions for the Project. The Section 106 Agreement will be secured with LB Enfield to complement the mitigation to be undertaken by the Applicant as part of the Project. The Applicant has agreed the scope of the Section 106 with LB Enfield.

## **7.4 Conclusion**

- 7.4.1 The Project is in conformity with NPS EN-1 and NPS EN-3. Furthermore, there are no significant conflicts with regional or local planning policy.
- 7.4.2 The Project has been designed to reduce effects as far as practicable and all necessary mitigation is either incorporated into the design, the Draft DCO (AD03.01) or the Section 106 Draft Agreement (AD03.03).
- 7.4.3 The Planning Act 2008 (as amended) requires that the Application should be decided in accordance with NPS EN-1 and NPS EN-3, except where certain legal tests would be infringed or 'the adverse impacts of the project would outweigh its benefits'. The Project does not infringe any legal tests. The benefits of the Project, most notably the contribution to meeting the urgent national need for low carbon energy and the need for new waste infrastructure, clearly outweigh the small number of adverse effects.

# Appendix A: Planning Policy and Context

## A1 Legislation

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### A1.1 European Directives

- A1.1.1 EU Directives set out targets that must be achieved within every Member State in relation to a specific subject matter and by a specified time. Authorities at a national level are free to decide how to implement these prescribed goals, and must adapt their laws accordingly. The Directives of relevance to the Project are set out below:
- A1.1.2 The European Energy Directive (Directive 2009/28/EC) sets out required levels of renewable energy use amongst member states with an overall 20 per cent target share of energy from renewable sources by 2020. The UK individually has been set a target of 15 per cent of energy from renewable sources from the total consumption of energy;
- A1.1.3 The Waste Framework Directive (Directive 2008/98/EC) (revised) came into force on 12 December 2008 and defines key concepts such as the handling, recovery and disposal of waste. Article 4(1) sets out the requirement of member states to make provision for waste hierarchy plans and states that waste prevention should be the preferred option followed by (in descending order): preparing for reuse, recycling and recovery. The Directive has been implemented into English legislation through the Waste (England and Wales) Regulations 2011 (SI 2011/988);
- A1.1.4 The Environmental Impact Assessment Directive (Directive 85/337/EEC) (revised) provides for mandatory Environmental Impact Assessments (EIAs) for projects such as long distances railway lines and motorways and express roads and discretionary EIAs through a 'screening procedure' which determines the effects of such projects on the basis of thresholds or on a case by case examination. The 2009 EIA Regulations provides for schedule 1 and 2 projects with amendments to the Directive (2014) stating that developers should now explain impacts from waste or use of natural resources and impacts of the project on, and resilience to climate change;
- A1.1.5 The Habitats Directive (Directive 92/43/EEC) is built around the twin pillars of the Natura 2000 network of protected sites and a strict system of species protection; and the Birds Directive (Directive 2009/147/EC) creating a comprehensive scheme of protection for all wild bird species naturally occurring within the Union and establishes a coherent network of Special Protected Areas. These directives are both implemented into UK legislation by the Conservation of Habitats and Species Regulations (2010);
- A1.1.6 The Landfill Directive (Directive 1999/31/EC) aims to reduce the reliance on landfill as a disposal option and imposes a minimum standard for landfills across the EU. The Directive places stringent engineering and operation considerations on landfill operators including the requirement to apply for a permit containing conditions which the operator must adhere to; and
- A1.1.7 The Waste Incineration Directive (Directive 2000/76/EC) aims to prevent harm to the environment and human health arising from the incineration

and co-incineration of waste. This objective is realised by requiring and setting stringent operational conditions, technical requirements and emission limit values for plants incinerating and co-incinerating throughout the EU.

## **A1.2 Planning Act 2008 (as amended)**

- A1.2.1 The Planning Act 2008 (as amended) provides that NSIPs must be decided against National Policy Statements (NPS). The Planning Act 2008 (as amended) states that where a NPS is in place, this should be the primary consideration for the SoS in making decisions regarding applications for NSIPs.
- A1.2.2 This is noted in Section 104 which sets out that the SoS is required to determine applications for NSIPs in accordance with the relevant NPSs unless this would:
- a. *“lead to the UK being in breach of its international obligations;*
  - b. *be in breach of any statutory duty that applies to the SoS;*
  - c. *be unlawful;*
  - d. *result in the adverse impacts of the development outweighing its benefits; or*
  - e. *be contrary to regulations about how decisions are to be taken.”*
- A1.2.3 The SoS must also have regard to any ‘local impact report’ submitted by a relevant local authority, any relevant matters prescribed in regulations and any other matters that the SoS thinks ‘important and relevant’, as outlined in Section 105 of the Planning Act 2008 (as amended).
- A1.2.4 Paragraph 4.1.5 of the Overarching National Policy Statement for Energy (NPS EN-1) clarifies the matters that the SoS may consider both important and relevant. It confirms that these may include development plan documents or other documents in the local development framework. NPS EN-1 is clear, however, that in the event of a conflict between these or any other documents and an NPS, the NPS prevails for the purposes of SoS decision-making given the national significance of the infrastructure.

## A2 National Policy Statements

A2.1.1 The relevant national policy statements for the Project are EN-1: Overarching National Policy Statement for Energy (NPS EN-1) and EN-3: National Policy Statement for Renewable Energy Infrastructure (NPS EN-3).

### A2.2 Overarching National Policy Statement for Energy (NPS EN-1)

A2.2.1 NPS EN-1 sets out how the energy sector can help to deliver the Government's climate change objectives and contribute to a diverse and affordable energy supply for the UK. It covers Government policy on energy and energy infrastructure development, the assessment principles for deciding applications and how impacts from new energy infrastructure should be considered in applications. NPS EN-1 identified an urgent 'need' for energy infrastructure development (Paragraph 4.1.2).

A2.2.2 Important considerations for the SoS to taken into account when making decisions about development consent applications for energy NSIPs are (Paragraph 4.1.3):

- a. the potential benefits including the contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
- b. the potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

A2.2.3 NPS EN-1 covers the Assessment Principles which should be taken into consideration for energy projects, those of relevance to the Project are summarised in Table A.1.

Table A.1: Assessment Principles in NPS EN-1

Topic	Policy	Ref
<b>Environmental Statement</b>	'Applicants are required to submit an Environmental Statement (ES) outlining the environmental impacts of the development.' The ES should set out the impacts (environmental, social and economic) of all stages of development. For the purposes of the proposed EfW plant, the ES is required to include an Environmental Impact Assessment (EIA).	Section 4.2.
<b>Habitat and Species Regulation</b>	the Planning Inspectorate must consider whether the project has a significant effect on a European site (or a site similarly protected by policy) either alone or in combination with other plans or projects. The applicant is required to consult with Natural England and provide any information necessary for Appropriate Assessment to the Planning Inspectorate. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.	Section 4.3.

Topic	Policy	Ref
<b>Alternatives</b>	<p>There is no 'general' requirement to consider alternatives, however there are a number of specific cases in which alternatives must be considered:</p> <ul style="list-style-type: none"> <li>• The ES is required to contain information on the main alternatives considered, with the primary economic, social and environmental reasons for any choices made; and</li> <li>• some specific legislation requires consideration of alternatives e.g. Habitats Directive.</li> </ul> <p>EN-1 also imposes a number of specific requirements to consider alternatives, these are:</p> <ul style="list-style-type: none"> <li>• <b>Biodiversity and Geological Conservation:</b> in order to avoid 'significant harm' to biodiversity and geological conservation interests, the applicant should address any mitigation issues and consider reasonable alternatives;</li> <li>• <b>Flood Risk:</b> Nationally significant energy infrastructure projects can be located in Flood Zone 3 or Zone C subject to the Exception Test, if there is no reasonably available site in Flood Zones 1 or 2 or Zones A &amp; B. Alternative sites should be considered and choices explained.</li> <li>• <b>Landscape and Visual:</b> the applicant should consider the possibility (and cost) of developing outside the designated area, or meeting the need in some other way.</li> </ul>	Section 4.4.
<b>Criteria for 'Good Design' for Energy Infrastructure</b>	<p>Good design, including aesthetics, functionality, sensitive use of materials and sensitive design in relation to landscape character should be considered in any development application. Applicants must justify the design and are encouraged to seek independent advice.</p> <p>Applicants must demonstrate 'a sustainable structure and efficient use of resources' for energy infrastructure.</p> <p>Decisions will assess the extent to which the application fulfils 'the ultimate purpose of the infrastructure' taking into account any operation, safety and security requirements to which the design must adhere.</p>	Section 4.5.
<b>Consideration of Combined Heat and Power (CHP)</b>	<p>As outlined in DECC's 2006 guidelines, a development application for a thermal generating station is required to include CHP, or at least the consideration of CHP.</p> <p>Applicants should consult with a number of stakeholders, including: potential heat customers, the Homes and Communities Agency (HCA), Local Enterprise Partnerships (LEPs) and Local Authorities.</p>	Section 4.6
<b>Climate Change Adaptation</b>	<p>Climate Change projections for UK are developed by government, alongside a National Adaptation Programme. the Planning Inspectorate may take into account energy utilities' reports to the Secretary of State when assessing measures for climate change adaptation put forward in applications for new energy infrastructure.</p> <p>the Planning Inspectorate must consider the UK Climate Projections available at the time the applicant's ES was prepared to ensure appropriate mitigation and adaptation measures are identified. At the very least, the emissions scenario from the Independent Committee on Climate Change (ICCC) at the time of writing should be used.</p>	Section 4.8

Topic	Policy	Ref
	Adaptation measures should use the most up-to-date UK Climate Projections and the Government's latest UK Climate Change Risk Assessment, and consultation with the Environment Agency should be undertaken.	
<b>Grid Connection</b>	A grid connection will be secured through discussion with the National.  Although the applicant does not need to have accepted or received a formal offer of grid connection at the time of the application, the Planning Inspectorate will need to be satisfied that there is no reason why a grid connection could not be secured.	Section 4.9
<b>Pollution Control and Other Environmental Regulatory Regimes</b>	the Planning Inspectorate will focus on whether the development proposes an 'acceptable use of land. A number of projects to which EN-1 is relevant will be subject to the Environmental Permitting (EP) regime, which sets various operational waste management requirements for certain activities.  An applicant is required to show that all relevant EP requirements can be met. They must prove to the Planning Inspectorate that the relevant pollution control authority will be satisfied that adequate regulation of potential releases is ensured, and that additional pollution created by the site will not make the development 'unacceptable' when combined with existing sources of pollution at the site.	Section 4.10
<b>Safety</b>	The Health and Safety Executive (HSE) should be consulted on all safety related matters.  To prevent major accidents involving dangerous substances and reduce the impacts upon people and the environment should they be unavoidable, certain energy infrastructure projects are required to meet the Control of Major Accident Hazards (COMAH) Regulations 1999. An applicant in this position should consult early with the 'Competent Authority.'	Section 4.11
<b>Hazardous Substances</b>	Hazardous Substances consent should be sought by all applications proposing to hold more than a certain threshold of hazardous substances on site.  Pre-application consultation should be held with HSE but it is the responsibility of the Planning Inspectorate to decide whether to grant Hazardous Substances consent when considering the development consent order.	Section 4.12
<b>Health</b>	The ES should assess any impacts of the proposed development on human beings, identifying adverse health impacts and any necessary mitigation measures.  Elements of energy infrastructure which may negatively affect health are generally subject to separate regulation and are thus these are unlikely to be used a reason for refusal under the Planning Act 2008.	Section 4.13
<b>Common Nuisance Law and Statutory Nuisance</b>	Under section 79(1) of the Environmental Protection Act 1990 applicants must demonstrate to the Planning Inspectorate that they have considered potential sources of nuisance and proposed mitigation measures for new energy infrastructure at the application stage, to ensure that 'appropriate requirements' can be included in a subsequent development consent order.  Statutory Authority for 'carrying out development consented to by, or doing anything else authorised by, a development	Section 4.14

Topic	Policy	Ref
	consent order' is conferred by Section 158 of the Planning Act 2008. This is conferred only for the purpose of providing a defence in any civil or criminal proceedings for nuisance. the Planning Inspectorate can choose not to apply the defence of the statutory authority in any particular case, but must consider whether a particular nuisance is an inevitable consequence of the development.	
<b>Security Considerations</b>	If a proposed development involves potentially 'critical' infrastructure, national security considerations may be required. It is the responsibility of experts from the Centre for the Protection of National Infrastructure (CPNI) and the Office for Civil Nuclear Security (OCNS) to confirm with the Planning Inspectorate that security issues have been adequately addressed.  Only sufficient information is required to allow the Planning Inspectorate to assess security issues with the development consent when making a decision on the application.	Section 4.15
<b>GENERIC IMPACTS</b>		
<b>Air quality and emissions</b>	An assessment of the effects of the project upon air quality should be undertaken where the proposed development may have adverse impact on air quality and emissions. This could be part of the ES.  In decision making, the Planning Inspectorate will generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits.  Mitigation measures will need to be considered, where necessary, both for operational and construction emissions. This links to details set out in Section 4.10.	Section 5.2
<b>Biodiversity and geological conservation</b>	If the application is subject to EIA, the ES should clearly outline any impacts the application on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. This should also show how opportunities to conserve and enhance biodiversity and geological conservation interests have been optimised.  Appropriate mitigation measures should be included within any proposed development.	Section 5.3
<b>Dust, odour, artificial light, smoke, steam and insect infestation</b>	An assessment of the potential for insect infestation and potential negative effects of emissions of odour, dust, steam, smoke and artificial light should be set out as part of the Environmental Statement. This should particularly consider the type, quantity and timing of emissions; effects of the emission on identified premises or locations; and measures to be employed in preventing or mitigating the emissions. Consultation should be undertaken with the relevant local planning authority, and the EA about the scope and methodology of the assessment.  Where necessary, appropriate mitigation measures should be included within any proposed development, including engineering, lay-out and administrative measures.	Section 5.6



Topic	Policy	Ref
<b>Flood Risk</b>	<p>A Flood Risk Assessment, setting out and assessing the risks from all forms of flooding to and from the project, and outlining any mitigation or management measures, will be required for the following applications for energy projects:</p> <ul style="list-style-type: none"> <li>• 1 hectare or greater in Flood Zone 1 in England or Zone A in Wales</li> <li>• All located in Flood Zones 2 and 3 in England or Zones B and C in Wales</li> <li>• Less than 1 hectare, but may be subject to sources of flooding other than rivers and the sea (for example surface water)</li> </ul> <p>Pre-application consultation with the EA is required for applicants for projects which may be affected by, or may add to, flood risk.</p>	Section 5.7
<b>Historic Environment</b>	<p>The ES should provide a description of any significant heritage assets impacted upon by the proposed development.</p> <p>Where the application is proposed to have an affect on the setting of a heritage asset, representative visualisations may be required.</p> <p>The extent of any impact on heritage assets should be clearly set out in the application and supporting documents.</p>	Section 5.8
<b>Landscape and Visual</b>	<p>A landscape and visual assessment and report should be provided within the ES. This should highlight any impacts of the proposed development (during construction and operation) on landscape components and character. This should cover topics including, visibility and conspicuousness of the project, potential impacts on views and visual amenity, and light pollution effects.</p>	Section 5.9
<b>Land use including open space, green infrastructure &amp; Green Belt</b>	<p>An assessment of existing and proposed land uses surrounding the application site, and any impacts of the proposed development upon this should be provided in the ES. Development in the Green Belt should not be approved except in very special circumstances. The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them.</p>	Section 5.10
<b>Noise and Vibration</b>	<p>A noise impact assessment should be provided alongside the application, where significant noise affects are expected. This should assess the noise generating aspects of the proposed development; identify those areas which may affected by noise; provide a prediction of how the proposed development will affect the noise environment; and propose measure to mitigate those impacts.</p> <p>Good design should be used to minimise adverse impacts, including: use of quiet cost-effective plant; containment of noise within buildings wherever possible; effective plant layout; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.</p>	Section 5.11
<b>Socio-economic</b>	<p>An assessment of the socio-economic affects of the proposed development should be undertaken at local or regional levels, where the potential impacts may be significant. This assessment should cover all relevant socio-economic impacts,</p>	Section 5.12

Topic	Policy	Ref
	including: job creation; training opportunities; local service provision; local infrastructure provision; educational and visitor facilities; and a cumulative effects assessment.	
<b>Traffic and Transport</b>	<p>If a project is likely to have significant transport implications, transport assessment should be included in the ES. Applicants should consult the Highways Agency and Highways Authorities as appropriate on the assessment and mitigation.</p> <p>A travel plan should be provided, where appropriate, which covers demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.</p> <p>Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective</p>	Section 5.13
<b>Waste Management</b>	<p>Arrangement for the management of any waste produced on site should be set out in a Site Waste Management Plan. This would cover the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.</p> <p>Where the project will be subject to the EP regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.10 will apply.</p>	Section 5.14
<b>Water quality and resources</b>	Should the proposed development be likely to affect the water environment, an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the ES .	Section 5.15

## A2.3 National Policy Statement for Renewable Energy Infrastructure (NPS EN-3)

- A2.3.1 NPS EN-3 sets out the ‘Technology Specific Considerations’ to be taken into account in the preparation and assessment of applications for renewable energy infrastructure, including impacts and matters including EfW.
- A2.3.2 Taken together with NPS EN-1, this provides *“the primary basis for decisions by the Infrastructure Planning Commission (IPC) on applications it receives for nationally significant renewable energy infrastructure<sup>54</sup>.”* The policies set out in this NPS are additional to those on generic impacts set out in NPS EN-1 and do not replace them.
- A2.3.3 The policy states that *“The IPC is expected to adhere to locational considerations when deciding on renewable energy infrastructure projects,*

<sup>54</sup> The IPC was abolished by the Localism Act 2011, applications are now examined by the Planning Inspectorate, and final decisions taken by the Secretary of State for Energy and Climate Change.

*and should prioritise sites for development where the resource exists and where it is economically feasible to allow such development.”*

A2.3.4 NPS EN-3 recognises that EfW will play an increasingly important role in meeting UK’s energy needs. It can also contribute to meeting UK’s renewable energy targets where the waste burned is deemed renewable. Table summarises relevant policies.

Table A.2: Relevant Policies in NPS EN-3

Policy	Ref
Regarding water resources, EfW proposals should consider how the plant will ‘be resilient to’ increased flood risk and risk of drought.	Paragraph 2.3.3
If the fuel used at an EfW plant is a prepared fuel, such as SRF, the waste hierarchy and conformity with it may have been assessed by the Waste Authority. The IPC (now the Planning Inspectorate) must take account of any assessment in considering the application.	Paragraph 2.5.9
the Planning Inspectorate will not consider throughput volumes as a factor in decision making. Nevertheless. Any adverse impacts resulting from an increase in throughput, such as traffic increases or air quality changes will be considered.	Paragraph 2.5.13
All development consent order applications must provide details of how the generating station will be connected, alongside any particular environmental issues arising from this proposed connection. This accords with Section 4.9 in EN-1.	Paragraph 2.5.24
Multi-modal transport of materials (fuels and residues) is promoted in government policy and developments will be expected to locate new facilities close to these multi-modal connections. Where possible applicants should: <ul style="list-style-type: none"> <li>• use existing transport routes</li> <li>• use rail or water transport (although viability of this should be considered as part of the economic assessment of the scheme)</li> <li>• connect road transport to the rail network, waterway or port.</li> <li>• Include adequate access from the main highway network.</li> </ul> Any new transport infrastructure proposed will be assessed by the Planning Inspectorate, and must be found acceptable in accordance with Section 5.13 of EN-1.	Paragraph 2.5.25
A new development should consider CHP as part of its application, or show that CHP has been considered. the Planning Inspectorate will seek further information should this not be provided, and development consent will not be given until the Planning Inspectorate is satisfied that sufficient evidence about CHP is provided.	Paragraph 2.5.26 to 2.5.27
EfW developments in the Green Belt are considered inappropriate development. ‘Very special circumstances’ which clearly outweigh negative impacts will need to be shown for projects in the Green Belt to proceed, such as wider environmental benefits associated with increased production of energy from renewable sources.	Paragraph 2.5.25

- A2.3.5 Sections 2.5.37 to 2.5.87 of NPS EN-3 outline a number of assessments required as part of the EIA for an NSIP for an EfW application. These include:
- a. an assessment of the air emissions resulting from the proposed infrastructure (Section 5.2 of EN-1);
  - b. An assessment of the landscape and visual effects of the proposed infrastructure (Section 5.9 of EN-1);
  - c. a noise assessment of the impacts on amenity in case of excessive noise from the project (Section 5.11 in EN-1);
  - d. An assessment of the potential for insect infestation and emissions of odour as set out in EN-1 Section 5.6 with particular regard to the handling and storage of waste for fuel;
  - e. An assessment of the proposed waste combustion generating station that examines the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority; and
  - f. an assessment as required in EN-1, Section 5.15 of the impacts on water quality or resource. The assessment should particularly demonstrate that appropriate measures will be put in place to avoid or minimise adverse impacts of abstraction and discharge of cooling water.

## **A3 Other National Policy**

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### **A3.1 The National Planning Policy Framework**

A3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and forms part of other relevant matters considered for determining DCO applications. The NPPF does not specifically contain any waste management policies however, it states that decisions on waste applications should have regard to policies in the NPPF as far as these are relevant.

A3.1.2 A number of policies may be considered relevant to the Project as follows:

- a. Policy 1 - Building a strong, competitive economy: promotes economic growth, utilising the strengths inherent in UK to meet global challenges of competition and a low carbon future. Supports developments which encourage 'sustainable economic growth';
- b. Policy 7 – Requiring Good Design: emphasises the importance of design to place making and improving the built environment, whilst ensuring that development is sustainable;
- c. Policy 9 – Protecting Green Belt Land – once defined, local authorities should plan to enhance the use of the Green Belt and support its five purposes as outlined in paragraph 80. In Green Belt, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Development of such a kind will not be permitted, even in 'very special circumstances' unless the potential harm to the Green Belt is outweighed by other considerations;
- d. Policy 10 - Meeting the challenge of climate change, flooding and coastal change: encourages new development that both reduces greenhouse gas emissions and actively supports energy efficiency improvements in existing buildings. Emphasis on minimising energy consumption and decentralised energy supply. Focus on development in areas of low flood risk unless there are significant reasons otherwise, and ensuring that development is appropriately flood resilient and resistant; and
- e. Policy 11 - Conserving and enhancing the natural environment: discusses the conservation and enhancement of the natural environment in relation to biodiversity, contamination, land use, noise, air quality and light pollution. Encourages the use of brownfield land for development provided it is not of high environmental value as well as the provision of adequate site investigation information and the incorporation of biodiversity around development where possible.

### **A3.2 National Planning Practice Guidance**

A3.2.1 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched this planning practice guidance web-based resource. This brings together all planning policy guidance in one place to make it

easy and accessible for all users. The NPPG provides support and clarification on the policies outlined in the NPPF.

### **A3.3 National Waste Policy**

#### **National Planning Policy for Waste**

A3.3.1 The National Planning Policy for Waste sets out the government's key planning objectives for sustainable waste management, requirements for waste plan-making authorities and the approach for the determination of planning applications. The policies set out in this document may be material to decisions for individual planning applications.

A3.3.2 The National Planning Policy for Waste provides overall objectives for waste management that should be addressed in determination of waste management planning applications. The following objectives are of particular relevance:

- a. delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits;
- b. providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle; and
- c. helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment.

A3.3.3 The National Planning Policy also defines a number of decision making requirements for planning authorities including the following:

- a. ensure that waste management facilities are well-designed, so that they contribute positively to the character and quality of the area in which they are located;
- b. consider the likely impact on the local environment and on amenity and the locational implications of any advice on health from the relevant health bodies; and
- c. only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan.

A3.3.4 The National Planning Policy for Waste also give guidance on waste development in Green Belts. It states that Green Belts have special protection and authorities should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development.

#### **The Waste Management Plan for England**

A3.3.5 The Waste Management Plan for England aims to bring current waste management policy in England under the umbrella of one national plan. It

provides a summary of the current waste management situation, gives guidance on site identification and summarises general waste management policies. No new policies are introduced in the Waste Management Plan for England, and it does not change the waste management landscape.

A3.3.6 All local planning authorities are required to pay regard to both the Waste Management Plan for England and national waste management policy when discharging their responsibilities in relation to waste management. As such, the Waste Management Plan for England must be considered during the decision making process.

A3.3.7 The Waste Management Plan for England makes specific reference to EfW, citing Government commitment to obtaining as much energy as possible from the waste produced through processes of anaerobic digestion (AD). The Government supports AD because of its value in dealing with organic waste and avoiding, by more efficient capture and treatment, the greenhouse gas emissions associated with its disposal to landfill.

## **A4 Regional planning context**

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### **A4.1 The London Plan consolidated with alterations since 2011**

A4.1.1 The London Plan was adopted by the Greater London Authority (GLA) in July 2011. In October 2013 the Mayor published Revised Early Minor Alterations to the London Plan 2011, which act as formal alterations to the London Plan 2011 and form part of the development plan for Greater London. Further Alterations to the London Plan were published in March 2015.

A4.1.2 The London Plan provides the strategic framework for the development of London until 2036 and forms part of the development plan for Greater London. It integrates economic, transport, environmental and social plans for the capital. Table A.3 summarises London Plan policies of particular relevance.

Table A.3: London Plan policies

Theme	Policy	Reference
Waste	<p><b>5.16 Waste Net Self-Sufficiency</b> Encourages the maximisation of positive environmental and economic impacts from waste processing. Sets targets for 50% of all domestic waste to be recycled/composted by 2020, and 60% by 2031. The target is set at 70% by 2020 for commercial and industrial waste.</p>	Policy 5.16 Page 211
	<p><b>5.17 Waste Capacity</b> Highlights the need to increase waste processing capacity in London, reiterating a commitment to identify opportunities for new waste capacity, including strategically important sites for waste management and treatment, and resource recovery works. Places an emphasis on sites where recycling, recovery and manufacturing activities can co-locate, and development with a range of complementary facilities on a single site. Especially supports developments which include renewable energy generation, especially those using technologies that produce a renewable gas. Encourages the pursuit of opportunities to provide combined heat and power, and combined cooling heat and power.</p>	Policy 5.17 Page 213
	<p><b>5.18 Construction, excavation &amp; demolition waste</b> Promotes new construction, excavation and demolition of waste management facilities at existing waste sites.</p>	Policy 5.18 Page 220
	<p><b>5.19 Hazardous Waste</b> Sets out requirements of the Hazardous Waste Report for London which details a capacity gap for dealing with London's hazardous waste.</p>	Policy 5.19 Page 221
	<p><b>5.20 Aggregates</b> Supports the construction in London by committing to ensure an adequate supply of aggregates, through: e-use and recycling of construction, demolition and excavation waste; extraction of land-won aggregates; and import of aggregates to London by sustainable transport modes.</p>	Policy 5.20 Page 222
Employment and Industry	<p><b>2.13 Opportunity Areas and Areas of Intensification</b> Requires developments within an opportunity area to meet the general policy directions outlined in Annexe 1 of the London Plan. Edmonton EcoPark falls within the Upper Lee Valley Opportunity Area. A number of the regeneration goals for this opportunity area are relevant to this application, including:</p> <ul style="list-style-type: none"> <li>• Minimum new homes of 20,100</li> <li>• Employment capacity of 15,000</li> </ul>	Policy 2.13 Page 77



Theme	Policy	Reference
	<p>Providing stimulus for regeneration in existing communities, including Edmonton, Unlocking development potential at Meridian Water</p> <p>Specific reference to the Edmonton EcoPark is also made in Annexe 1, which states that it has potential to provide heat and power to neighbouring developments, and is the largest waste facility in London.</p>	
	<p>2.17 Strategic Industrial Locations</p> <p>Supports the promotion, management and (where appropriate) protection of Strategic Industrial Locations (SILs). Development proposals in SILs will be refused unless they fall within broad industrial type activities.</p>	<p>Policy 2.17 Page 91</p>
	<p>4.1 Developing London's Economy</p> <p>Commits to encourage and support London's economic development through ensuring a 'strong, sustainable and increasingly diverse' economy. Focuses on providing adequate size, price and type of workspaces, as well as reinforcing London's move towards a low carbon economy and the economic benefits which arise from this transition.</p>	<p>Policy 4.1 Page 150</p>
	<p>4.4 Managing Industrial Land and Premises</p> <p>Pledges to ensure the supply of adequate land and premises to meet the various industrial and related land uses required across London.</p>	<p>Policy 4.4 Page 158</p>
	<p>4.12 Improving opportunities for all</p> <p>Requires that development proposals provide and support local employment, skills development and training opportunities.</p>	<p>Policy 4.12 Page 178</p>
Traffic and Transport	<p>6.3 Assessing Effects Of Development On Transport Capacity</p> <p>Requires the transport capacity impacts (both present and future) of any development to be assessed at both corridor and local level. No adverse impacts on transport network safety should be associated with new developments.</p> <p>Major planning applications must adhere guidelines detailed in TfL's Transport Assessment Best Practice Guidance, which sets out thresholds, outside of which applicants must provide workplace and/or residential travel plans.</p> <p>Where necessary, construction logistics plans and delivery and servicing plans should be provided with travel plans.</p>	<p>Policy 6.3 Page 245</p>
	<p>6.9 Cycling</p> <p>Encourages the promotion of cycling in all new developments.</p>	<p>Policy 6.9 page 256</p>

Theme	Policy	Reference
	<p>Sets out minimum standards for the provision of cycle parking facilities in terms of number of spaces, and design. All developments should 'provide secure, integrated, convenient and accessible cycle parking facilities.' Changing facilities and showers are also required to be provided on-site.</p> <p>Cycling facilities should link up to the existing and planned cycle networks and infrastructure across London, and should positively contribute to the cycling environment.</p>	
	<p>6.10 Walking</p> <p>Requires all development proposals to incorporate 'high quality pedestrian environments,' referring to Transport for London's Pedestrian Design Guidance.</p>	<p>Policy 6.10 Page 258</p>
	<p>6.12 Road Network Capacity</p> <p>Sets out criteria for developments which require increasing road capacity, including new roads, which include: contribution to London's sustainable development and regeneration additional traffic numbers and impacts on the local area improving transport for pedestrians, cyclists, public transport users, freight and local residents ensuring and enhancing road safety</p> <p>Requires developments to demonstrate a net benefit across these criteria overall. Mitigation measures for any adverse impacts must be demonstrated.</p>	<p>Policy 6.12 Page 261</p>
	<p>6.13 Parking</p> <p>Sets out maximum standards for car parking per development, including standards for disabled parking. .</p> <p>Requires new developments to provide electrical charging points for electric vehicles (1 in 5 spaces); meet minimum cycle parking stands; and provide space for delivery and service vehicles.</p>	<p>Policy 6.13 Page 262</p>
	<p>6.14 Freight</p> <p>Encourages new developments which generate significant numbers of freight movements to be located in proximity to major transport routes.</p> <p>Supports the increased use of the Blue Ribbon Network for transportation of freight.</p>	<p>Policy 6.14 Page 266</p>
Sustainability	<p>5.1 Climate Change Mitigation</p> <p>Sets a target to reduce London's carbon dioxide emissions to 60 per cent (below 1990 levels) by 2025.</p>	<p>Policy 5.1 Page 185</p>
	<p>5.2 Minimising Carbon Dioxide Emissions</p> <p>Requires that development proposals contribute to reducing carbon dioxide emissions by adhering to the energy hierarchy: Be lean: (use less energy); Be clean (supply energy efficiently); and Be green (use renewable energy).</p>	<p>Policy 5.2 Page 186</p>

Theme	Policy	Reference
	An energy assessment must be submitted with all new major developments to provide a detailed energy assessment which shows their commitments to reducing greenhouse gas emissions. This energy assessment should include calculation of the proposed demand for energy, and resultant carbon dioxide emissions; any proposals to decrease or mitigate these emissions on-site; any off-site mitigation strategies; and any proposals to supply decentralised energy through district heating, and cooling and combined heat and power (CHP).	
	<p><b>5.3 Sustainable Design And Construction</b> Promotes the highest sustainable design standards to improve environmental performance of new developments and to adapt to the effects of climate change over their lifetime.</p> <p>Requires new development proposals to show how sustainable design standards have been integrated into the proposal at all stages of construction.</p> <p>A design and access statement should be provided alongside major development proposals, which clearly shows how the proposals meet the minimum design standards outlined in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance.</p>	Policy 5.3 Page 189
	<p><b>5.5 Decentralised Energy Networks</b> Sets out a target of 25% of London's heat and power to be generated by localised decentralised energy systems by 2025.</p> <p>Commits to promoting the provision of decentralised heating and cooling networks, at the area-level and site-specific scale.</p>	Policy 5.5 Page 194
	<p><b>5.6 Decentralised Energy In Development Proposals</b> Requires the evaluation of the possibility of providing Combined Heat and Power (CHP) systems for all developments. Where a new CHP system is appropriate, development applications must assess opportunities to extend the system beyond the site boundary.</p> <p>Sets out a hierarchy of energy systems which should be followed for all major development proposals:</p> <ul style="list-style-type: none"> <li>• Connection to existing heating or cooling networks;</li> <li>• Site wide CHP network;</li> <li>• Communal heating and cooling.</li> <li>• Where future network opportunities have been previously identified, proposals should be designed to connect to these networks.</li> </ul>	Policy 5.6 Page 197
	<p><b>5.7 Renewable Energy</b> Seeks to increase the proportion of energy generated from renewable sources.</p>	Policy 5.7 Page 197

Theme	Policy	Reference
	Within the framework of the energy hierarchy (see Policy 5.2), major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.	
	5.8 Innovative Energy Technologies Promotes the use of innovative energy technologies to reduce use of fossil fuels and carbon dioxide emissions.	Policy 5.8 Page 199
	5.9 Overheating And Cooling Requires major development proposals to consider ways to reduce potential overheating and reliance on air conditioning systems, through its design, materials, construction and operation.	Policy 5.9 Page 200
Contamination	5.21 Contaminated Land Supports the remediation of contaminated sites, ensuring that the use of brownfield land for development does not result in significant negative impacts upon the environment or human health.	Policy 5.21 Page 224
	5.22 Hazardous Substances And Installations Requires that development near 'hazardous installations' provide an assessment of the site specific circumstances and proposed mitigation measures, applying the Health and Safety Executive's Planning Advice Developments near Hazardous Installations (PADHI) methodology. Any possible risks or adverse impacts should be outweighed by the development's benefits.	Policy 5.22 Page 225
Noise	7.15 Reducing Noise And Enhancing Soundscapes Supports the management and reduction of noise in all new development through the following requirements: <ul style="list-style-type: none"> <li>• avoid significant adverse noise impacts on health and quality of life as a result of new development;</li> <li>• reduce and mitigate any existing or future negative impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;</li> <li>• improve the acoustic environment;</li> </ul>	Policy 7.15 Page 300
Air Quality	7.14 Improving Air Quality Supports the management of air quality in all new development through the following requirements: Minimise additional exposure to poor air quality, in areas of existing poor air quality. Ensure the use sustainable design and construction principles to decrease potential harmful emissions during both construction and operation stages. Be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality.	Policy 7.14 Page 298

Theme	Policy	Reference
	Where an air quality assessment is required and biomass boilers are included, this should forecast pollutant concentrations. Permission will only be granted if no adverse air quality impacts from the biomass boiler are identified.	
Water and Flood Risk	<p><b>5.12 Flood Risk Management</b></p> <p>Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 (TE2100 – see paragraph 5.55) and Catchment Flood Management Plans.</p> <p>Developments which are required to pass the Exceptions Test set out in the NPPF and the Technical Guidance will need to address flood resilient design and emergency planning by demonstrating that: the development will remain safe and operational under flood conditions; a strategy of either safe evacuation and/or safely remaining in the building is followed under flood conditions; key services including electricity, water etc. will continue to be provided under flood conditions and buildings are designed for quick recovery following a flood.</p>	Policy 5.12 Page 204
	<p><b>5.13 Sustainable Drainage</b></p> <p>Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.</p> <p>Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.</p>	Policy 5.13 Page 205
	<p><b>5.14 Water Quality And Wastewater Infrastructure</b></p> <p>Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and of the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</p>	Policy 5.14 Page 206
	<p><b>5.15 Water Use And Supplies</b></p> <p>Development should minimise the use of mains water by: a incorporating water saving measures and equipment b designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day</p>	Policy 5.15 Page 208
	<p><b>Policy 7.24 Blue Ribbon Network</b></p> <p>Sites the Blue Ribbon Network as a strategically important series of linked spaces.</p> <p>Promotes the use of waterspace and land alongside for water-related purposes, particularly transport (both freight and passenger).</p>	Policy 7.24 Page 313

Theme	Policy	Reference
	<p>Policy 7.26 Increasing The Use Of The Blue Ribbon Network For Freight Transport Promotes the increased use of the Blue Ribbon Network to transport freight. Requires developments close to waterways to maximise the use of waterways to transport bulk materials, particularly during the demolition and construction stages of development. Any existing waterborne freight facilities should be protected.</p>	<p>Policy 7.26 Page 313</p>
	<p>Policy 7.27 Blue Ribbon Network: Supporting Infrastructure And Recreational Use Requires development proposals to ‘protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths)’. Seeks the provision of new access infrastructure into and alongside the Blue Ribbon Network.</p>	<p>Policy 7.27 Page 314</p>
	<p>Policy 7.28 Restoration Of The Blue Ribbon Network Requires developments to restore and enhance the Blue Ribbon Network by: taking opportunities to open culverts and naturalise river channels; increasing habitat value. Any development adversely affecting biodiversity will be refused.</p>	<p>Policy 7.28 Page 318</p>
	<p>Policy 7.30 London’s Canals And Other Rivers And Waterspaces Requires development proposals along London’s canal network and other rivers and waterspace to respect and contribute to the local character and improve access to waterways.</p>	<p>Policy 7.30 Page 322</p>
<p>Greenbelt</p>	<p>7.16 Green Belt Provides London’s Green Belt with the ‘strongest protection’ in accordance with guidance in national policy. Supports the refusal of any ‘inappropriate development’, except in very special circumstances. Appropriate development will be supported, if it contributes to securing the objectives of improving the Green Belt as set out in national guidance.</p>	<p>Policy 7.16 Page 301</p>
<p>Landscape and Biodiversity</p>	<p>2.18 Green Infrastructure: the network of open and green spaces Supports development proposals which incorporate appropriate elements of green infrastructure throughout development. Requires that developments integrate green space provision into the wider green and open space networks.</p>	<p>Policy 2.18 Page 94</p>
	<p>5.10 Urban Greening Promote schemes for ‘urban greening’. These could include additional planting in the public realm (streets, squares etc.), and also other green infrastructure which can contribute to adaptation to, and reduction of, the effects of climate change.</p>	<p>Policy 5.10 Page 202</p>

Theme	Policy	Reference
	<p><b>5.11 Green Roofs And Development Site Environs</b> Requires major development proposals to include roof, wall and site planting, especially green roofs and walls where feasible.</p> <p>Supports the delivery of the following objectives in all major development, as much as possible: climate change adaptation and mitigation; sustainable urban drainage; biodiversity enhanced; building resilience and growing of food.</p>	<p>Policy 5.11 Page 203</p>
	<p><b>7.19 Biodiversity And Access To Nature</b> Requires that developments make a 'positive contribution to the protection, enhancement, creation and management of biodiversity.' Development should contribute to targets set in biodiversity action plans (BAPs), and/ or help improve access to nature in areas deficient in accessible wildlife sites.</p> <p>Developments which may have should 'significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP' will be resisted.</p>	<p>Policy 7.19 Page 306</p>
	<p><b>7.21 Trees And Woodlands</b> Requires the protection, maintenance and enhancements of trees and woodlands. The London Tree and Woodland Framework (or any successor strategy) should be used as guidance. Additional trees should be proposed in new developments, wherever this may be appropriate.</p>	<p>Policy 7.21 Page 310</p>
Design	<p><b>7.2 An Inclusive Environment</b> Sets out the need for all new development to be of the highest standard with regard to accessibility and inclusivity in design.</p> <p>Requires the submission of a Design and Access Statement alongside development proposals to cover how the principles of inclusive design, including the specific needs of both older and disabled people.</p>	<p>Policy 7.2 Page 277</p>
	<p><b>7.3 Designing Out Crime</b> Requires development proposals to consider measures for designing out crime, in order to reduce the opportunities for criminal behaviour on-site. These should not compromise the overall design of the development.</p>	<p>Policy 7.3 Page 278</p>
	<p><b>7.4 Local Character</b> Requires all development proposals to consider how they integrate with the 'form, function, and structure' of the existing area, and the 'scale, mass and orientation' of neighbouring buildings.</p>	<p>Policy 7.4 Page 278</p>
	<p><b>7.6 Architecture</b> Requires all buildings and structures to: be of high architectural quality;</p>	<p>Policy 7.6 Page 283</p>

Theme	Policy	Reference
	<p>reflect, but not necessarily replicate, local architectural character; cause no harm to the amenity of the surrounding area, particularly with regard to privacy, climatic impacts and light.</p> <p><b>7.7 Location And Design Of Tall And Large Buildings</b> Requires all applications for tall or large buildings to provide an urban design analysis showing how the development meets the following criteria:</p> <ul style="list-style-type: none"> <li>• integrated into the existing streetscape and surrounding area;</li> <li>• located in areas where this would not witness any adversely impacts in terms of massing and scale;</li> <li>• applies highest standards of sustainable design and construction;</li> <li>• improve site permeability</li> <li>• contribute to local regeneration.</li> </ul> <p>Developments proposed in sensitive locations (which might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings) should particularly consider the impacts of any tall buildings. The impact of tall buildings proposed in sensitive locations should be given particular consideration.</p> <p><b>7.13 Safety, Security And Resilience To Emergency</b> Requires developments to minimise the possibility of physical risks, including those from fire, flood and related hazards.</p> <p>Designing out crime is necessary in all development, relevant to the risk involved in the project. Developments should also consider the need for measures to deter terrorism, and help defer its effects.</p>	<p>Policy 7.7 Page 284</p> <p>Policy 7.13 Page 296</p>
Archaeology	<p><b>7.8 Heritage Assets And Archaeology</b> Requires development to 'identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate'. Any development which will have an affect on heritage assets and their settings should have regard to their design, scale and materials.</p> <p>Requires the protection of 'archaeological resources, landscapes and significant memorials'. Any new development near such factors should ensure their protection. Physical assets should, where possible, be available to the public.</p>	<p>Policy 7.8 Page 286</p>
Geological Conservation	<p><b>7.20 Geological Conservation</b> Requires development proposals to 'make a positive contribution to the protection and enhancement of geodiversity'.</p>	<p>Policy 7.20 Page 309</p>



Theme	Policy	Reference
	Where a proposals might have significant adverse effects on areas with existing or proposed European or national designations, development will be resisted.	
Planning Obligations	8.2 Planning Obligations States that economic viability will be a key consideration in all planning applications, as well as the existence and content of any planning obligations. Requires proposals to consider both local and strategic priorities in planning obligations.	Policy 8.2 Page 332

## **A4.2 Upper Lee Valley Opportunity Area Planning Framework**

A4.2.1 The Upper Lee Valley Opportunity Area Planning Framework (OAPF) was produced by the GLA, working with the LBs Enfield, Hackney, Haringey and Waltham Forest and was adopted in July 2013. This is Supplementary Planning Guidance to the London Plan and sets out a regeneration framework for the Upper Lee Valley. The OAPF sets out eight objectives, two of which are of particular relevance to Edmonton Eco Park:

- a. growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponder's End;
- b. a Lee Valley Heat Network linked to the Edmonton EcoPark.

A4.2.2 The OAPF identifies the Edmonton EcoPark as the preferred location for a supply hub for a LVHN, with use being made of existing generating facilities. It also sets out a preference for provision of an energy centre within the Edmonton EcoPark with the ability to operate top-up and standby steam boilers.

A4.2.3 The Edmonton EcoPark is also identified as a significant regeneration and redevelopment opportunity in the area to provide the next generation of waste services and provide energy for the LVHN. The OAPF safeguards Edmonton EcoPark for continued industrial employment use and aims to create better connections between industrial sites and the Lee Valley Regional Park and Banbury Reservoir.

### **London's Wasted Resource London's Municipal Waste Management Strategy**

A4.2.4 London's Wasted Resource details the Mayor's policies for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. This strategy also sets out how the Mayor, through the London Waste and Recycling Board, will help develop more waste management infrastructure in London.

A4.2.5 The following the policies are of relevance:

- a. Policy 1: informing producers and consumers of the value of reducing, reusing and recycling municipal waste sets out the target of a 20 per cent reduction in London's waste by 2031. The Mayor particularly promotes local and regional education programmes and initiatives as a method of achieving this goal;
- b. Policy 2: reducing climate change impacts of London municipal waste management sets out the Mayor's greenhouse gas emissions performance standard (EPS) for London's municipal waste management activities. The Mayor has also set a minimum CO<sub>2</sub> emissions performance that requires all energy generated from London's municipal waste to be no more polluting in carbon terms than the energy it replaces;

- c. Policy 4: achieving high recycling and composting rates resulting in the greatest environmental and financial benefits supports high quality infrastructure provision for the reprocessing of recyclable materials. This policy also sets out an ambition to recover as much material as possible from residual waste for recycling and for generating renewable energy; and
- d. Policy 5: stimulating development of new municipal waste management infrastructure, particularly low carbon technology aims for London to be a best practice example of innovation in 'next generation' waste facilities. It is predicted that an additional 3.3 million tonnes of waste management capacity is needed across London by 2031, but the Mayor's wishes to move away from the traditional low value, low tech transfer facilities and towards 'state-of-the art resource recovery parks' which will have positive effects upon their surrounding communities in terms of access to renewable, decentralised energy sources, as well as employment.

### **A4.3 Making Business Sense of Waste: The Mayor's Business Waste Management Strategy**

- A4.3.1 Making Business Sense of Waste details the Mayor's strategy for London's business waste. It sets out policies for encouraging resource efficiency within London's businesses, as well as encouraging recycling, renewable energy generation and new waste infrastructure.
- A4.3.2 The strategy sets out a target of 70 per cent of all Commercial and Industrial Waste to be reused, recycling or composted by 2020. The target is 90 per cent for construction, demolition and excavation waste.
- A4.3.3 The following policies are of relevance:
  - a. Policy 1: help businesses to identify and implement waste prevention measures seeks to promote the value of resource efficiency for businesses – financially, commercially and environmentally. The policy sets out a range of strategies including the use of various communications initiative to promote the benefits of resource efficiency; and
  - b. Policy 3 supporting the waste infrastructure market in London to grow and to deliver for business highlights the need for waste infrastructure to support businesses to become more resource efficient. The policy states that the Mayor will 'use his influence over London's planning regime to ensure that new waste treatment infrastructure is not delayed in being brought to market.' In addition is outlines a commitment to promoting the development of waste facilities which are integrated into the urban environment.

### **A4.4 Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaptation Strategy**

- A4.4.1 Managing Risks and Increasing Resilience is the Mayor's climate change adaptation strategy for London. It details his strategic approach to managing the climate risks being faced in the capital now and in the future.

- A4.4.2 Topics covered in the strategy include economic impacts, health, overheating and drought. Chapter 3 looks specifically at flooding and encourages an improved understanding of flood risk and impacts, as well mechanisms for reducing and mitigating these risks.
- A4.4.3 Chapter 9 focusses on Infrastructure and the need to ensure climate resilience for energy and other utilities. It encourages the use of renewable energy sources, including EfW. Particular consideration is given to centralised combined cooling heat and power in Action 5.9, which sets a 25 per cent target of London's energy being supplied by decentralised energy for both new and existing development.
- A4.4.4 Chapter 9 also considers the need for waste management infrastructure to be resilient to climate change. New facilities will need to be flexible to changes in the waste product, as well as being resilient to risks from climate changes, such as flood and extreme weather.

## **A4.5 Delivering London's Energy Future: The Mayor's Climate Change Mitigation And Energy Strategy**

- A4.5.1 Delivering London's Energy Future is the Mayor's climate change mitigation and energy strategy. It sets out his strategic approach to limiting further climate change and securing a low carbon energy supply for London. To limit further climate change the Mayor has set a target to reduce London's CO<sub>2</sub> emissions by 60 per cent of 1990 levels by 2025. Delivering London's Energy Future details the programmes and activities that are ongoing across London to achieve this.
- A4.5.2 The strategy covers improving domestic energy uses; cutting costs and carbon dioxide emission in office across London, transport's role in London's energy future, and alternative energy generators. On the latter, the strategy promotes (as part of Policy 5) a decentralised energy programme and sets a specific target for 25 per cent of London's energy to come from secure, low carbon local sources. This is reinforced in Action 5.6 which highlights the Mayor's commitments to working with London boroughs and the London Waste and Recycling Board to 'ensure London's indigenous energy resources, particularly waste, are available to support meeting the Mayor's target to supply 25 per cent of London's energy from decentralised sources.'
- A4.5.3 The strategy also support specifically EfW programmes, with the Mayor providing financial support for the development of new waste management infrastructure in London, including EfW technologies that generate renewable heat and power.

## **A4.6 Mayor's Sustainable Design and Construction Supplementary Planning Guidance**

- A4.6.1 To support sustainable design and construction policies in the London Plan, the Mayor's Sustainable Design and Construction SPG sets out in greater detail the mayor's priorities in delivery high quality design and construction

in a range of areas, including noise, air quality, flood risk, energy and site layout.

A4.6.2 Mayoral priorities of relevance include:

- a. maximising long term carbon dioxide savings by feeding the decentralised energy network with low or zero carbon hot, and where required, cold water;
- b. encouraging a mix of uses, where suitable should be included to provide a range of services commensurate to the public transport accessibility;
- c. Having no net loss in the quality and quantity of biodiversity;
- d. Minimising the generation of air pollution;
- e. Prioritising materials with a low embodied energy, which can be sustainably sourced and are durable; and
- f. Designing developments which are flexible and capable of being adapted to and mitigating the potential increase in flood risk as a result of climate change.

A4.6.3 This document does not set new policy, but explains how policies in the London Plan should be carried through into action. While this SPG does not have formal development plan status, as it has undergone a formal consultation process and has been formally adopted by the Mayor as supplementary planning guidance it is a material consideration in taking planning decisions.

## **A4.7 Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy**

A4.7.1 The Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy – SPG sets out in policy a framework for seeking contributions through the planning system towards funding Crossrail. The Mayor has brought forward a Community Infrastructure Levy charging schedule setting out the charges applicable for different types of development in different parts of London.

## **A4.8 Other Mayoral Strategies**

A4.8.1 The following strategies produced by the GLA are also of relevance:

- a. Mayor's Transport Strategy (May 2010): sets out the transport vision for London and details how Transport for London and partners will deliver the plan over the next 20 years. Mechanisms for improving transport in the capital include: improving safety and security; smoothing traffic flow, particularly for the freight industry; reducing and improving air quality, noise and health impacts; and requiring new developments to incorporate networks to encourage walking and cycling;
- b. Clearing the air: the Mayor's Air Quality Strategy (December 2010): sets out Mayoral ambitions for air quality in the capital, including aims to reduce health impacts and increase quality of life through encouraging cleaner air in London. It details a framework for air quality improvements,

- including: mechanisms for reducing emissions from transport, homes, and offices. Of particular interest is Policy 7 which commits that new developments in London will be, as a minimum, 'air quality neutral.' This will be achieved through minimising increased exposure to existing poor air quality; and ensuring air quality benefits are realised through developer contributions;
- c. Securing London's water future: The Mayor's Water Strategy (October 2011): outlines key requirements and issues surrounding water in the capital, and sets out a number of ambitions for the future. These include: increasing water efficiency and reducing wastage; supporting Londoners to be proactive in saving water and energy; and managing flood risk to increase resilience; and
  - d. The Mayor's Economic Development Strategy for London (May 2010): details the Mayor's objectives for the London economy, which include: London as the World Capital of Business, with the world's most competitive business environment; London as one of the world's leading low carbon capitals; and all Londoners sharing in London's economic success. The Strategy provides a range of actions to be taken forward to reach these goals, and forms a key part of a strategic policy framework to support and shape London's social and economic development.

## **A5 Sub-Regional Policy**

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### **A5.1 Draft North London Waste Plan**

- A5.1.1 The draft North London Waste Plan (NLWP) was published for consultation in July 2015. Prepared by the seven Constituent Boroughs, it identifies sites for waste management use for north London's waste up to 2031 and sets out policies for determining relevant planning applications.
- A5.1.2 Policy 1 of the draft NLWP identifies Edmonton EcoPark as a site safeguarded for existing waste management (Site ENF19) and its continued use for waste management purposes is supported. In addition to this, the application site is identified within strategic area allocation A12-EN Eley's Estate (Policy 3) as suitable for the future provision of expanded or updated waste management facilities of all types (see figure A5.1). The draft NLWP also references this proposal for a new ERF within Edmonton EcoPark, and identifies this new development as a strategic facility for the NLWP.
- A5.1.3 Policy 3, as well as allocating land, sets out requirements for development applications within these allocated areas. It states that application for waste management development will be permitted if the proposals comply with other relevant policy and deliver the 'highest practicable level' of recycling and recovery of materials.

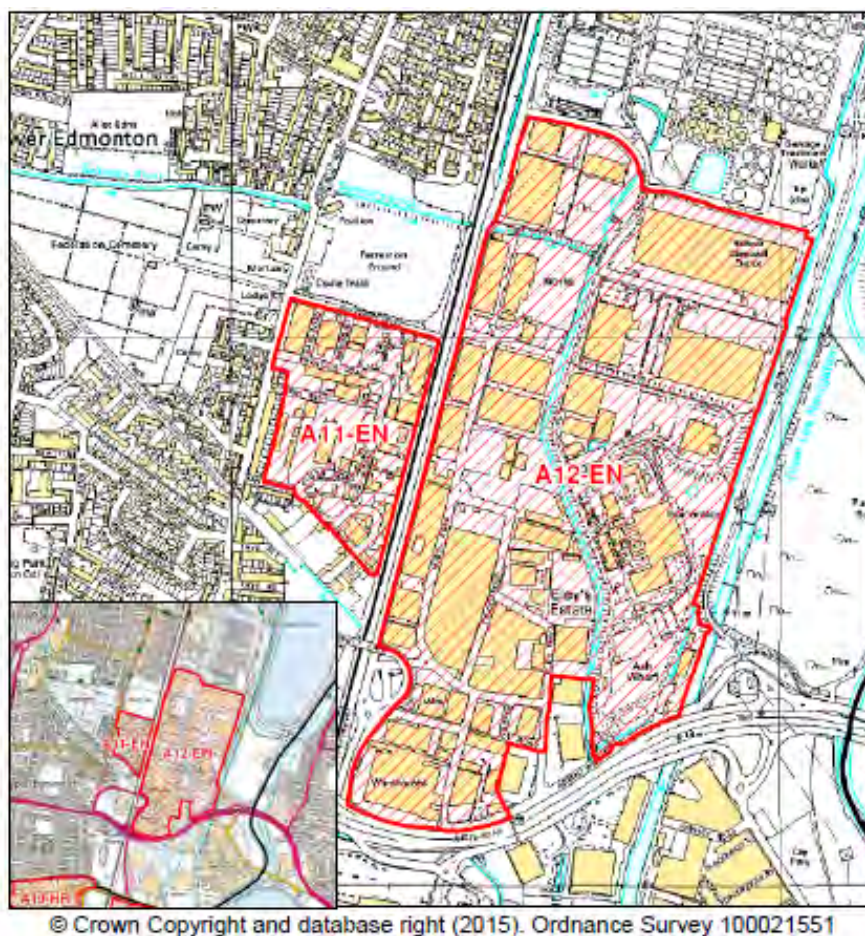


Figure A5.1: Draft NLWP Area Allocation A12-EN

- A5.1.4 The draft NLWP also provides guidance on the format and design of waste management development. In Policy 6 it sets out a number of criteria, including:
- a. ensuring the amenity of local residents is protected;
  - b. avoiding significant adverse impacts on other land uses, historic environment and transport;
  - c. ensuring the development of a scale, form and character which is in keeping with its environment; and
  - d. not contributing to increased flood risk.
- A5.1.5 In addition, Policy 7 of the draft NLWP supports the recovery of energy from waste on allocated sites, where feasible, and the provision of a supply to networks, including decentralised energy networks.
- A5.1.6 The draft NLWP is currently in the consultation phase and the timetable for adoption is Autumn 2017 as set out in Table A.4.

Table A.4: NLWP Programme

Stage	Programme
Consultation on draft plan	September - October 2015
Consultation on Submission Plan	Summer 2016
Submission	Autumn 2016
Hearing	Winter 2016/2017
Inspector's report	Summer 2017
Adoption	Autumn 2017

- A5.1.7 The NLWP will not be in a final or submission-ready form at the time of the examination (i.e. post-consultation). The Planning Act 2008 does not include any specific guidance on the relevance that will be placed on any proposed plans / guidance and such decisions fall to the discretion of the Secretary of State depending on its importance and relevance.

## **A6 Local planning context**

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- A6.1.1 The LB Enfield Local Plan comprises: The Enfield Plan Core Strategy 2010-2025 and the Development Management Document Supplementary Planning Document. Other local development plan documents currently being prepared include the Central Leaside Area Action Plan. A site allocations schedule is planned for adoption in 2017. These documents will form part of the Enfield Local Plan upon adoption. The Edmonton EcoPark Planning Brief Supplementary Planning Document expands upon policies in the Local Plan.
- A6.1.2 London Borough of Haringey and London Borough of Waltham Forest planning policies that are relevant to the proposed development are also included in this section.

### **A6.2 Local Planning Designations**

- A6.2.1 A number of local planning designations apply to the Application Site. These are shown on the Enfield Adopted Local Plan Policies Map (November 2014) an extract of which is illustrated in Figure A.1. The Edmonton EcoPark is allocated as Strategic Industrial Land. The wider Application Site is subject to a number of other allocations including:
- Green Belt;
  - Site of Metropolitan Importance for Nature Conservation ; and
  - Lee Valley Regional Park.



Edmonton EcoPark

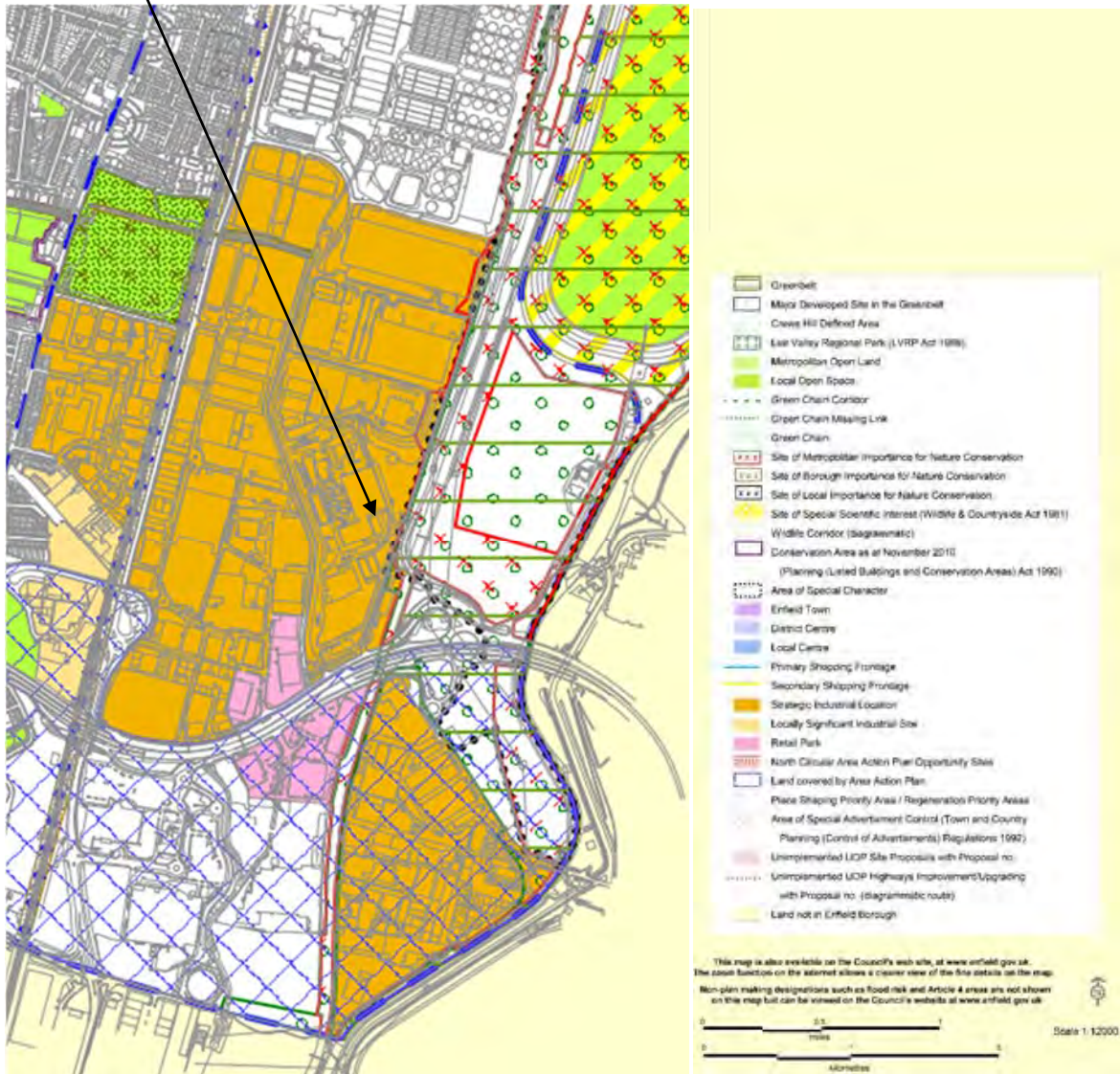


Figure A.1: Planning Designations from Enfield Adopted Local Plan

### A6.3 Enfield Plan Core Strategy 2010-2025

A6.3.1 Enfield Plan Core Strategy 2010-2025 (the Core Strategy sets out the spatial framework for the long term development of the borough until 2025. It sets out the overarching spatial vision and objectives up to 2026, with the aim of making it ‘a prosperous and sustainable borough, with a strong sense of place and identity’.

A6.3.2 Table A.5 set out policies of relevance to the Project.

Table A.5: Core Strategy Policies

Theme	Policy
<b>Employment and Industry</b>	<p><b>Core Policy 1 Strategic Growth Areas</b></p> <p>Future growth in LB Enfield is to be focussed in 4 key areas: North East Enfield, Enfield Town, North Circular Road, and Central Leaside. The Edmonton EcoPark is located within Central Leaside area. Priority will be given to social and physical infrastructure improvement in these areas to ensure sustainable development.</p>
	<p><b>Core Policy 13 Promoting Economic Prosperity</b></p> <p>The council aims to ‘protect and improve’ the employment offer in LB Enfield, with a minimum target of 6,000 new jobs between 2010 and 2026.</p> <p>Within the Central leaside Area, there is a commitment to reversing the current trend of decreasing employment.</p>
	<p><b>Core Policy 14 Safeguarding Strategic Industrial Locations</b></p> <p>A number of sites are identified for safeguarding as Strategic Industrial Locations (SILs), including a number in the Central Leaside Area.</p> <p>Edmonton EcoPark is identified as a SIL within this policy, with 16 hectares safeguarded for industrial uses at the site.</p>
	<p><b>Core Policy 17 Town Centres</b></p> <p>The District Centres of LB Enfield are identified as Angel Edmonton, Edmonton Green, Palmers Green and Southgate.</p> <p>Edmonton Green and Angel Edmonton will be priorities for physical, environmental and economic renewal.</p>
<b>Sustainability</b>	<p><b>Core Policy 20 Sustainable Energy Use and Energy Infrastructure</b></p> <p>All new developments are required to use energy generated from renewable sources, minimise energy consumption and supply energy as efficiently as possible.</p> <p>It is proposed that the Council will set local targets for energy consumption based on local context, which are set out in more detail in the Development Management Policies DPD.</p>
	<p><b>Core Policy 21 Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure</b></p> <p>LB Enfield’s future water resource needs, wastewater treatment and drainage infrastructure should be managed in a coordinated way, with promotion of water conservancy and sustainable drainages systems.</p> <p>It may be that developers are required to assess the impact of their development on existing water supply and wastewater infrastructure.</p>
	<p><b>Core Policy 22 Delivering Sustainable Waste Management</b></p> <p>Existing waste management sites and any other sites located in LB Enfield identified in the NLWP will be safeguarded, unless provision of these facilities can be provided elsewhere within the seven North London boroughs.</p>

Theme	Policy
	<p>Existing waste facilities should be used more efficiently, with potential for co-location of various waste uses.</p> <p>Edmonton EcoPark remains a strategic waste site and opportunities to incorporate more sustainable and efficient waste management processes should be maximise, including decommissioning the existing waste incinerator, and considering opportunities to provide local energy to the proposed Meridian Water development.</p>
<b>Transport</b>	<p><b>Core Policy 24 The Road Network</b></p> <p>Sustainable travel choices and reductions in congestion will be encouraged.</p>
	<p><b>Core Policy 25 Pedestrians and Cyclists</b></p> <p>‘Safe, convenient and accessible’ walking and cycling routes will be promoted.</p> <p>Emphasis will be placed on those schemes which address issues of severance at the community level, especially those creating links between recreational areas, such as the Lee Valley Regional Park.</p>
	<p><b>Core Policy 26 Public Transport</b></p> <p>The council will seek to develop and maintain a ‘comprehensive, safe, accessible, welcoming and efficient public transport network’.</p> <p>All new developments have to assess the impacts of their scheme upon existing and proposed public transport provision, and ensure development proposals can be accommodated within that provision.</p>
	<p><b>Core Policy 27 Freight</b></p> <p>Freight movement, by rail, road and water should be both efficient and sustainable.</p> <p>Freight uses will be promoted in areas with good access to the strategic road network and/or proposed water and rail freight facilities,</p>
<b>Flood Risk and Management</b>	<p><b>Core Policy 28 Managing Flood Risk Through Development</b></p> <p>Development will be directed to areas of lowest flood risk in accordance with PPS 25<sup>55</sup>. However the policy supports in principle development sites in Central Leaside that lie in flood risk zones 2 and 3a but that contribute to strategic objectives for change in the Upper Lee Valley.</p> <p>Developments in flood risk areas should thoroughly consider impacts of the development, mitigate any flood impacts and reduce flood risk overall.</p> <p>Redevelopment of existing industrial sites within SILs will be encouraged provided that overall flood risk is reduced.</p> <p>All development in flood risk areas should use flood resistant and resilient design, and Sustainable Urban Drainage Systems are required in all developments.</p>
	<p><b>Core Policy 29 Flood Management Infrastructure</b></p>

<sup>55</sup> PPS 25 was superseded in March 2014 by the Planning Practice Guidance

Theme	Policy
	<p>Opportunities for the removal of culverts, river restoration and naturalisation should be considered for any development adjacent to a watercourse.</p> <p>Any development taking place behind existing flood defences should decrease residual flood risk and consider the potential for floodwater storage, river restoration and wetland creation.</p> <p>New and innovative methods for assessing flood risk are promoted as part of the Meridian Water and Central Leaside regeneration.</p>
Design	<p><b>Core Policy 30 Maintaining and Improving the Quality of the Built and Open Environment</b></p> <p>Any new development should be of high quality and be design-led, whilst taking account of and complementing their context.</p>
	<p><b>Core Policy 31 Built and Landscape Heritage</b></p> <p>Heritage assets in LB Enfield should be both preserved and enhanced.</p> <p>Potential for new archaeological finds should be taking into account for all development, through site investigations and consultation with English Heritage.</p>
Pollution	<p><b>Core Policy 32 Pollution</b></p> <p>Developments will minimise air, water, noise and light pollution, and issues arising from contaminated land and hazardous. Developers should assess the impacts of their development upon all these factors, and consider how any harmful effects will be mitigated.</p>
Landscape and Environment	<p><b>Core Policy 33 Greenbelt and Countryside</b></p> <p>The Council will continue to protect and enhance LB Enfield's green belt.</p> <p>Positive uses for the use of the green belt will be promoted, whilst ensuring it is meeting its statutory purposes.</p>
	<p><b>Core Policy 34 Parks, Playing Fields and Other Open Spaces</b></p> <p>Existing open space is to be protected and enhanced by the Council. Opportunities to improve open space provision will also be considered.</p> <p>There is a requirement for new open space in the Central Leaside Area, as part of the proposed Meridian Water regeneration project, providing strong links to the Lee Valley Regional Park.</p>
	<p><b>Core Policy 35 Lee Valley Regional Park and Waterways</b></p> <p>Opportunities to improve access to the Lee Valley Regional Park, particularly from residential communities to the west of the park will be considered, with particular emphasis on Ponders End and Central Leaside. This is considered in further detail in the relevant area action plans.</p>
	<p><b>Core Policy 36 Biodiversity</b></p> <p>LB Enfield's 'biodiversity interests' (which include parks, playing fields, other green spaces, waterways, habitats and species of importance for nature conservation at the European, national,</p>

Theme	Policy
	regional or local level) should be protected, enhanced, restored or supplemented.
<b>Area specific policies</b>	<p><b>Core Policy 37 Central Leaside</b></p> <p>The Central Leaside area is to largely retain its existing character as an industrial and employment area.</p> <p>There is opportunity to increase the residential elements of this area through the Meridian Water regeneration proposing a sustainable mixed use development with approximately 5,00 new homes and 1,500 jobs<sup>56</sup> (see Core Policies 2 and 13).</p> <p>Edmonton EcoPark is supported in this area as site for waste management in line with Core Policy 22</p> <p>Any new development in this area should have particular regard for transport impacts and should act to improve vehicular, pedestrian and cycle connections, as well as public realm and access to Lee Valley Regional Park.</p>
	<p><b>Core Policy 38 Meridian Water</b></p> <p>Up to 5,000 new homes and 1,500<sup>56</sup> new jobs will be created as part of the Meridian Water Regeneration project.</p> <p>Any new development in this area will be required to consider alternative, contemporary environmental technologies such as district heat networks in line with Core Policy 22.</p>
<b>Developer Contributions</b>	<p><b>Core Policy 46 Infrastructure Contributions</b></p> <p>Developments granted planning permission by LB Enfield will typically be required to pay contributions to physical and social infrastructure in the borough.</p> <p>Contribution negotiations will take place on a site by site basis, and individual contexts will be taken into account when provisions are sought.</p> <p>The costs of drafting planning obligations, and the Council's subsequent administrative and monitoring costs will be covered by the developer.</p>

## A6.4 Development Management Document

A6.4.1 LB Enfield's Development Management Document (DMD) provides detailed criteria and standard based policies for assessing planning applications. It builds of the Core Strategy to enable the delivery of its vision and principles for Edmonton.

A6.4.2 Table A.6 sets out relevant DMD policies.

Table A.6: Enfield DMD Policies

Topic	Policy
	<b>DMD 19 Strategic Industrial Locations</b>

<sup>56</sup> Since the Core Strategy was published LB Enfield has confirmed an aspiration for a higher number of jobs. The Meridian Water Masterplan states there would be up to 3,000 jobs.

Topic	Policy
<b>Employment and Industry</b>	<p>The only development permitted in SILs will be those involving: 'general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities and other industrial related activities, including green industries and management of waste'. Edmonton Eco Park is designated as a SIL (See Chapter 3).</p> <p>Any developments which propose to remove industrial capacity for SILs will be refused.</p>
	<p><b>DMD 23 New Industrial Development</b></p> <p>New industrial development will be permitted if they have no negative impacts on noise and disturbance, access, parking and servicing in the area arise.</p> <p>Any development will need to be consistent with the scale, bulk and appearance of other developments in its surroundings.</p> <p>Proposals for industrial development within SIL should contribute to, where appropriate, environmental and traffic improvement schemes for that SIL.</p>
<b>Design</b>	<p><b>DMD 37 Achieving High Quality and Design-Led Development</b></p> <p>Development should be appropriate to the surrounding context, integrating into existing neighbouring developments. It should provide continuity with existing character, whilst providing quality public realm, ease of movement, legibility and diversity.</p> <p>The principles of Secured by Design should be used in all development, to maximise safety and security.</p>
	<p><b>DMD 38 Design Process</b></p> <p>Design and access statements submitted with development applications should clearly demonstrate the rationale behind designs, as well as how they have evolved.</p> <p>They should include an analysis of the site context, opportunities and constraints; an assessment of how the proposed design speaks to this analysis; and a summary of how designs meet planning policy at all spatial scales.</p>
	<p><b>DMD 43 Tall Buildings</b></p> <p>There is a presumption against the development of tall buildings in sensitive areas, which include those within and adjacent to green Belt. Developments are required to show how designs avoid adverse impacts in these area.</p> <p>Tall buildings should be assessed for their suitability with regard to site context and scale/height of surrounding buildings.</p>
	<p><b>DMD 44 Conserving and Enhancing Heritage Assets</b></p> <p>Development proposals should make steps to both conserve and enhance any heritage assets. This includes consistent / complementary design, materials and detailing of new development with existing heritage buildings</p> <p>A Heritage Statement should be submitted with any application affecting heritage assets or their setting. Detailed information about</p>

Topic	Policy
	the asset gained should be disseminated to the Local Planning Authority, Historic Environment Record and English Heritage.
<b>Transport</b>	<p><b>DMD 45 Parking Standards and Layout</b></p> <p>The standards set out in the London Plan will apply to all developments proposing car parking.</p> <p>Cycle parking and passive electrical charging points should also be provided in line with standards outlined in the London Plan.</p> <p>Car Parks must incorporate sustainable urban drainage, provide adequate space for service and emergency vehicles, and meet all manoeuvring requirements.</p> <p>Full accessibility for the mobility impaired is a necessary condition for all development, with the maximisation of ‘walkability’ and pedestrian permeability in particular.</p> <p><b>DMD 46 Vehicle Crossovers and Kerbs</b></p> <p>New access routes onto ‘A roads’ will not normally be permitted.</p> <p>Vehicle crossovers and dropped kerbs that allow for off-street parking and access onto roads will only be permitted if the following criteria are met:</p> <ul style="list-style-type: none"> <li>• The access route does not adversely affect the existing streetscape or cause loss of front gardens and grass verges;</li> <li>• Street trees are not removed / lost as a result;</li> <li>• Road safety is not compromised by the route;</li> <li>• There is no adverse impact on the existing road network with regard to preventing free flow of traffic or additional on-street parking;</li> <li>• The crossover permits vehicles to enter and exit in forward gear; and</li> <li>• Alternatives have been assessed and this is shown to be the most appropriate.</li> </ul> <p><b>DMD 47 Access, New Roads and Servicing</b></p> <p>Non- vehicular Access</p> <p>‘Attractive, safe, clearly defined and convenient routes and access’ should be provided as part of all new development for pedestrians (including those with disabilities or mobility impairments). Developments should integrate pedestrian routes and accesses with the wider pedestrian network in the borough.</p> <p>Similarly, new developments should provide access for cycling, with the provision of separate routes where appropriate. The impact of the development upon public transport services will also be assessed and major development should demonstrate the network has capacity to cope the proposed growth.</p> <p>Vehicular access and servicing</p> <p>New development must not have any adverse impacts on highway safety or free flow of traffic.</p> <p>New access onto roads with a speed limit above 40mph must comply with design standards within DMRB (The Design Manual for Roads and Bridges). New access onto other roads must have</p>

Topic	Policy
	<p>regard to the Manual for Streets and Manual for Streets 2 or replacement publications.</p> <p><b>DMD 48 Transport Assessments</b> All major development proposals should be accompanied by a Transport Assessment. Where the Transport Assessment identifies a need to improve modal choice, pedestrian accessibility, minimise congestion or reduce pollution then a Travel Plan will be required. Servicing and Delivery Plans and Construction Logistics Plan Tall major developments are encouraged to submit a Servicing and Delivery Plans and Construction Logistic Plans (CLP).</p>
Sustainability	<p><b>DMD 49 Sustainable Design and Construction Statements</b> New developments are required to meet the 'highest sustainable design and construction standards.' Within this, measures should be implemented to ensure that development has no adverse impact on climate change. Where possible measures for climate change mitigation or adaptation should be included. A Sustainable Design and Construction Statement must be submitted with all applications.</p> <p><b>DMD 50 Environmental Assessment Methods</b> New developments must demonstrate compliance with targets relating to the relevant adopted environmental assessment methods. Major non-residential developments must demonstrate a 'very good' BREEAM rating up to 2015, and 'excellent' from 2016 to 2018, moving to 'outstanding' by 2019.</p> <p><b>DMD 51 Energy Efficiency Standards</b> All developments will be required to demonstrate how the proposal minimises energy-related CO<sub>2</sub> emissions in accordance with the following energy hierarchy: reduce; reuse; recycle; recover. The following targets are set for non-residential development proposals resulting in greater net non-residential floorspace:</p> <ul style="list-style-type: none"> <li>• 40% improvement in carbon dioxide reduction between 2013 to 2016;</li> <li>• Moving towards zero carbon from 2019</li> </ul> <p><b>DMD 52 Decentralised Energy Networks</b> Decentralised energy network infrastructure and related apparatus will be encouraged in the Borough, with support for the provision of infrastructure to support new and expanding networks. Proposals for major developments which produce heat and/or energy should contribute to the supply of decentralised energy networks unless it can be demonstrated that this is not technically feasible or economically viable.</p> <p><b>DMD 53 Low and Zero Carbon Technology</b> Major developments are required to provide on-site renewable energy generation where all possible savings through energy</p>



Topic	Policy
	<p>efficiency and decentralised energy networks have been secured and there remains a shortfall in meeting carbon dioxide reduction targets.</p> <p>Local opportunities to contribute towards decentralised energy supply from low and zero carbon technologies will be encouraged, where there is no overriding adverse local impact including identified impacts to historic assets.</p>
	<p><b>DMD 54 Allowable Solutions</b></p> <p>Financial contributions to off-set identified short falls in the attainment of energy efficiency standards will be permitted, where such standards have been proven not to be technically feasible or economically viable.</p>
	<p><b>DMD 55 Use of Roof Space/Vertical Surfaces</b></p> <p>All development should make use of all its available roof space and vertical surfaces. This will be in the form of zero carbon technologies, green roofs and / or living walls subject to economic and planning feasibility.</p>
	<p><b>DMD 56 Heating and Cooling</b></p> <p>All new non-householder developments will be required to demonstrate design measures that enable the scheme to control and manage heat gain and reduce the reliance on mechanical cooling.</p>
	<p><b>DMD 57 Responsible Sourcing of Materials, Waste Minimisation and Green Procurement</b></p> <p>All new developments must ensure materials are responsibly sourced. In particular, 100% of timber used on the project must be sourced in accordance with the UK Government's Timber Procurement Policy.</p> <p>Under the relevant BREEAM assessment, non-residential development should meet a minimum requirement of 3 out of 6 credits for MAT1 assessment and 2 out of 3 credits for MAT3 assessment.</p> <p>All major developments must submit a Site Waste Management Plan which detail how waste from construction will be minimise in line with the waste hierarchy: reduce; reuse; recycle; recover. Development must divert a minimum of 85% of non-hazardous waste from landfill with a strategic objective of 95% of waste by 2020.</p> <p>In addition, they must submit a Green Procurement and Construction Plan which sets out how the development has minimised its environmental impacts through local procurement, responsible sourcing and minimised waste.</p>
	<p><b>DMD 58 Water Efficiency</b></p> <p>All new development should maximise water efficiency. Non-residential development involving the creation, extension or replacement of non-residential floorspace will be required to exceed the following improvements in water efficiency over the notional baseline:</p>

Topic	Policy
	2013-2015: 12.5% 2016-2018: 25% 2019 onwards: 65% Developments will be encouraged to include rainwater collection and means of greywater recycling.
<b>Contamination</b>	<b>DMD 66 Land Contamination and Instability</b> Development which presents unacceptable risks of land contamination and instability will not be permitted. If appropriate remediation measures are assessed and implemented that planning permission may be granted. Assessments of any land contamination and stability risks will need to accompany development proposals on land which is or may be affected by contamination and/or instability. Where adverse impacts are identified, developers must provide more detailed investigations/studies to determine the level of contamination, assess the risks and provide details of a remediation and management strategy.
	<b>DMD 67 Hazardous Installations</b> Development of new hazardous installations or development within a site with hazardous installations may not be permitted. Developers may be required to submit an assessment of risks.
<b>Noise</b>	<b>DMD 68 Noise</b> Exposure to noise and noise generation must be minimised for all developments through design, management and operation. Developments that generate an unacceptable level of noise will not be permitted. A noise assessment must be submitted with applications, detailing the adverse impacts of development and the proposed measures for mitigation. Potential noise generating development must be proposed in appropriate locations, where no negative impacts upon amenity will be felt.
<b>Light pollution</b>	<b>DMD 69 Light Pollution</b> Developments should limit and reduce the adverse impact of light pollution. Developments resulting in light pollution that has a harmful impact on local amenity/wildlife/conservation will not be permitted.
<b>Air Quality</b>	<b>DMD 64 Pollution Control and Assessment</b> Developments will only be permitted if pollution and the risk of pollution is minimised and mitigated, during all phases of development.
	<b>DMD 65 Air Quality</b> Unless the developer can demonstrate that adverse effects on air quality can be mitigated, planning permission will be refused for developments that have an adverse effect on air quality. An air quality assessment should be submitted alongside any major development proposed in an air quality hotspot. This will detail the

Topic	Policy
	adverse impacts of the development, and any necessary mitigation. Sensitive uses will only be permitted if sited away from major sources of pollution or adequate mitigation measures are secured to improve air quality.
<b>Flood Risk</b>	<p><b>DMD 59 Avoiding and Reducing Flood Risk</b> All new development must mitigate the risk of flooding and not increase the risk of flooding elsewhere. Development should: be appropriately located and informed by a Flood Risk Assessment (FRA) if proposed in flood risk areas; Ensure no net loss of flood storage on site; Manage source water; and Prevent the loss of permeable surfaces/areas of soft landscaping</p> <p><b>DMD 60 Assessing Flood Risk</b> All development proposed within Flood Zones 2 and 3, and those over 1 hectare in flood zone 1 are required to submit a Site specific Flood Risk Assessment (FRA). The FRA should provide adequate information that the decision maker can 'assess whether the requirements of the sequential test of sites across the borough are met'. Where an exception test is required, developments must demonstrate that the wider sustainability benefits of the development to the community will outweigh the possible flood risk; reasonable alternatives have been assessed and this is the most appropriate option; and development will not increase flood risk elsewhere. Further mitigation requirements may be necessary if the development is in an area at risk of groundwater flooding.</p> <p><b>DMD 61 Managing Surface Water</b> All developments must demonstrate management of surface water as close to the source as possible and follow the drainage hierarchy in the London Plan. Where possible, Sustainable Drainage Systems (SuDS) should be included in designs or retrofitted. All major developments must achieve greenfield run off rates (for 1 in 1 year and 1 in 100 year events). Developments are required to submit a drainage strategy with applications. This may be as part of the requirement for a full Flood Risk Assessment or as a separate Sustainable Design and Construction Statement.</p> <p><b>DMD 62 Flood Control and Mitigation Measures</b> All new development resulting in increased flood risk should adopt mitigation measures such as: improving existing flood infrastructure at a sufficient standard of protection. Where this is not possible, development might expect to provide financial contributions towards measures which mitigate flood risk. Flood resilient designs should be used in all new developments at risk from flooding, and flood Warning arrangements and Evacuation Plans will be required.</p>

Topic	Policy
	<p><b>DMD 63 Protection and Improvement of Watercourses and Flood Defences</b></p> <p>Proposals on sites close to waterways will be require to locate development back from water in order to maintain the integrity of any flood defences. The distance applied will be relative to the nature of the development and the type of watercourse.</p> <p>Development on or next to waterways must not adversely impact on that waterway.</p>
Water Quality	<p><b>DMD 70 Water Quality</b></p> <p>Development will be refused is it is shown to negatively impact upon water quality. All development close to a waterway will need to consult with the Environment Adjacent to assess any water quality risks from the proposed development.</p>
Landscape and Biodiversity	<p><b>DMD 75 Waterways: Waterfront Character and Access to Waterways</b></p> <p>Development on sites which are at or near to riverside areas should both protect and enhance the waterfront character in the area. This context should be respected and complemented by any new industrial development, ensuring that aesthetically pleasing views from the water way are ensured.</p>
	<p><b>DMD 76 Wildlife Corridors</b></p> <p>Any development proposals on sites adjacent to (or within) a wildlife corridor should make steps to protect and enhance that wildlife corridor as part of the development.</p>
	<p><b>DMD 77 Green Chains</b></p> <p>The policies map sets out a number of 'Green Chains' across the borough. Any development proposal within a 5 minute walk or 400 metre radius of one of these Green Chains is required to provide links with the network. Green Chains should be integrated into any such development proposals, and any adverse impacts should be minimised.</p>
	<p><b>DMD 78 Nature Conservation</b></p> <p>Where a potential adverse impact on ecological assets is identified, developments must demonstrate measures for mitigation of such effects, or where necessary show that the harm cannot reasonably be avoided.</p>
	<p><b>DMD 79 Ecological Enhancements</b></p> <p>On-site ecological enhancements should be provided on any site which proposes the creation of more than 1 net dwelling or 100sqm of floorspace. These could include bird boxes. Wildlife friendly landscaping or green roofing.</p>
	<p><b>DMD 80 Trees on Development Sites</b></p> <p>No development should cause harm to, or the loss of trees of particular significance or biodiversity value.</p> <p>In the circumstance that the removal of these trees has been permitted, then it is expected that replacements will be planted to ensure no overall loss.</p>

Topic	Policy
	<p><b>DMD 81 Landscaping</b></p> <p>High quality landscaping is a requirement of all proposed development. It must be ensured that development enhance the local environment through the provision of appropriate landscaping interventions.</p>
Green Belt	<p><b>DMD 82 Protecting the Green Belt</b></p> <p>Any development considered 'inappropriate' will not be permitted within LB Enfield's Green Belt. Development which is considered not to be inappropriate will be permitted if the following requirements are met:</p> <ul style="list-style-type: none"> <li>• Proposed development is of a 'siting, scale, height and bulk' which contributes and is complementary to preserving the openness of the Green Belt;</li> <li>• High quality design and landscaping are proposed for the development, minimising any adverse visual impacts upon the green belt., particularly with regard to site contours;</li> <li>• Proposed development harmonises with natural features of the greenbelt, through the use of appropriate finish and colour;</li> <li>• The retention of existing trees and other natural features will be ensured where possible, and where not possible adequate mitigation measures must be proposed before permission will be granted; and</li> <li>• Development should provide 'appropriate parking provision, safe access, egress and landscaping' to make sure that development does not compromise the Green Belt's openness.</li> </ul>
	<p><b>DMD 83 Development Adjacent to the Green Belt</b></p> <p>Permission will only be granted for development within close proximity of the Green Belt if:</p> <ul style="list-style-type: none"> <li>• Views and vistas from the Green Belt and preserved and maintained;</li> <li>• The division between Green Belt and urban areas remains distinct; and</li> <li>• The building's massing, height and scale have no impact (with regard to visual dominance) on the Green Belt.</li> </ul>
	<p><b>DMD 89 Previously Developed Site in the Green Belt</b></p> <p>Redevelopment of previously developed sites in the Green Belt is only allowed if:</p> <ul style="list-style-type: none"> <li>• It has no increased effect on the openness of the Green Belt;</li> <li>• The developed proportion of the site is not increased;</li> <li>• Traffic generation is not significantly increased by proposed development; and</li> <li>• It contributes toward sustainable development.</li> </ul>

## **A6.5 Proposed Submission Central Leaside Area Action Plan (published for consultation January 2015)**

- A6.5.1 The Proposed Submission Central Leaside Area Action Plan (CLAAP) outlines the planning framework for delivery of employment, housing and community facilities for the area from the LB Haringey boundary in the south to Pickett's Lock in the north, identifying sites for new development and associated infrastructure to support and facilitate future growth.
- A6.5.2 The Proposed CLAAP was approved by the Council for statutory consultation on 19 November 2014. It was available for comment and consultation between 5 January and 16 March 2015 – the final consultation stage.
- A6.5.3 Within the Proposed CLAAP, Edmonton EcoPark is recognised as a preferred location for the management of north London's municipal waste and a potential energy from waste hub. One of its key objectives relates specifically to Edmonton EcoPark (Objective 4: Delivering Sustainable Regeneration) outlining a desire to nurture a centre of excellence in sustainable waste management around the Edmonton EcoPark.
- A6.5.4 Chapter 8 focusses on the redevelopment of Edmonton EcoPark, acknowledging that it is needed 'to provide the next generation of waste services and additional community benefits through the provision of heat for a decentralised energy network.' Policy CL22: Redevelopment of the EcoPark site outlines the council's requirements, which include; providing improved waste treatment facilities to meet the needs of north London's residents; taking a design-led approach to redevelopment with high quality design, landscaping and materials; minimising emissions to air and water; maximising energy and resource efficiency; and ensuring local access to employment and training opportunities. It also requires Edmonton EcoPark to support the implementation of the LVHN.
- A6.5.5 The Edmonton EcoPark is identified as the key heat source for initial development of the LVHN. This requirement is set out in Policy CL30, which states that an energy centre will be established on Edmonton EcoPark alongside a network route linking the energy centre to the Meridian Water development. This policy further states that in order to support the LVHN's delivery, any development at Edmonton EcoPark should use its existing heat and energy from the current EfW facility to supply the LVHN DHEC, and once the new EfW facility is in operation, heat from this should then supply the DHEC. There is to be a break of no longer than six months in the heat supply between the decommissioning of the existing EfW facility and the proposed development. The policy also imposes a requirement to incorporate space for an energy centre on the site, alongside a connection from EfW sources of energy/heat into the LVHN DHEC, low temperature hot water (LTHW), and if requested in the future steam, pipe network leaving the site.
- A6.5.6 The Proposed CLAAP also focusses on the transport impacts of any new development, suggesting that there is potential to reduce the impacts on the road network by transferring road freight to the waterways. The CLAAP also notes that a Freight by Water Feasibility Study considers the

transportation of SRF from Edmonton EcoPark via water as a technically feasible option, with the capacity to accommodate an annual flow of 300,000Te and requiring fewer containers compared to road transport. Construction materials and waste from new developments within Central Leaside could also be transferred via the waterways.

## **A6.6 Meridian Water Masterplan**

A6.6.1 The Meridian Water Masterplan covers the area of land to the south of the Application Site, and identifies how LB Enfield and its partners can deliver the regeneration of this area to provide up to 5,000 new homes and 3,000 jobs by 2045, along with complementary infrastructure. The Meridian Water Masterplan is the key focus of many local policy documents for both its regeneration aims, and its use of the LVHN. The key elements of the Meridian Water Masterplan are outlined in Section 3.2 Surrounding Planning Context.

## **A6.7 Edmonton EcoPark Planning Brief (supplementary planning document to the Local Plan)**

A6.7.1 The Edmonton EcoPark Planning Brief Supplementary Planning Document (SPD) guides future development at the site. It sets out the opportunities and constraints for the development of new waste management and other facilities on the site, and provides the principles which these should follow.

A6.7.2 There is no additional policy contained in the Edmonton EcoPark SPD, but it does give detailed, site specific guidance on how to achieve the objectives set out in the Enfield Local Plan.

A6.7.3 Chapter 3 of the Edmonton EcoPark SPD provides a detailed site assessment outlining the key opportunities and constraints. This involves consideration of location, existing land uses, existing site conditions, and wider regeneration context.

A6.7.4 Chapter 4 sets out the principles which future development at the site should follow, including: the use of sustainable design and construction methods; and high quality design principles for layout, aesthetics and materials. In addition it highlights overarching drivers of change which should be taken into account by any future development at Edmonton EcoPark, including: sustainable treatment of waste; decentralised energy provision; and employment in green industries.

A6.7.5 Chapter 5 outlines includes a list of the documents which would be expected to accompany any application, details of consultation requirements, and possible planning obligations which might be expected to accompany any permission.

## **A6.8 Section 106 Supplementary Planning Document**

A6.8.1 LB Enfield's Section 106 SPD forms part of the Local Plan for LB Enfield. Although this document is aimed at applications to the LPA rather than

NSIPs, it remains a material consideration in the determination of planning applications within LB Enfield.

A6.8.2 The SPD sets out the requirements for S106 agreements in LB Enfield, including circumstances in which a S106 agreement is likely to be required; and details on the type and level of contribution necessary.

A6.8.3 Chapter 6 considers viability, in the context of the existing economic climate. When imposing Section 106 requirement, viability issues must be considered.

## **A6.9 Considerations in adjoining boroughs**

A6.9.1 Whilst the Application does not include land within any adjoining boroughs, the policies below provide the wider policy context surrounding the site. The following section sets out the policy context in the borough's adjoining LB Enfield, and in close proximity to the Edmonton EcoPark Site: LB Haringey and LB Waltham Forest.

### **Tottenham Area Action Plan (Preferred options, February 2015)**

A6.9.2 The Tottenham Area Action Plan (AAP) covers the area of Haringey to the south of the application site. The northernmost point of the AAP is located 750m from the application site. The AAP sets out guidelines and policies for planning in Tottenham to support long-term regeneration, alongside new homes, jobs and transport infrastructure. A preferred options consultation version of the Tottenham AAP was published in February 2015. Once adopted this will become a supplementary planning document to the Haringey Local Plan.

A6.9.3 Of the four neighbourhoods considered in the document, North Tottenham (which includes Northumberland Park, the Tottenham Hotspur Stadium & High Road West) is the closest to the site. Within this neighbourhood a number of improved residential neighbourhoods, major estate regeneration programmes and redevelopment of Tottenham Hotspur stadium are planned.

### **Waltham Forest Site Specific Allocations (Preferred Options 2013)**

A6.9.4 Consultation on the Waltham Forest Site Specific Allocations Preferred Options was held in July 2013. This includes a site allocation policy for Land near William Girling and King George's Reservoir Margins (SSA15) for 'protection and enhancement of biodiversity and green corridors.' Chingford Mill Pumping Station, Lower Hall Lane (SSA17), located to the east of the Application Site is identified as primarily for residential development, although a mix of complementary uses may be considered, including community uses. Planning permission was granted for a low density residential development in 2007, but the site has not been developed out.



**Waltham Forest Blackhorse Lane Area Action Plan (proposed submission March 2013)**

- A6.9.5 The northernmost part of the area covered by the Waltham Forest Blackhorse Lane Area Action Plan (AAP) is located approximately 750m from the Application Site. Within this AAP, the Banbury reservoir is rejected as a potential site allocation because it is designated as a Site of Nature Conservation and falls within the Green Belt, and it is felt employment needs can be met elsewhere in the surrounding area.

## Appendix B: Policy compliance checklist

### B1 National planning policy

Document	Policy	Compliance
Overarching National Policy Statement for Energy (EN-1) (July 2011)	Section 4.2 Environmental Statement	✓
	Section 4.3 Habitat and Species Regulation	✓
	Section 4.4. Alternatives	✓
	Section 4.5 Criteria for 'Good Design' for Energy Infrastructure	✓
	Section 4.6 Consideration of Combined Heat and Power (CHP)	✓
	Section 4.8 Climate Change Adaptation	✓
	Section 4.9 Grid Connection	✓
	Section 4.10 Pollution Control and Other Environmental Regulatory Regimes	✓
	Section 4.11 Safety	✓
	Section 4.12 Hazardous Substances	✓
	Section 4.13 Health	✓
	Section 4.14 Common Law Nuisance and Statutory Nuisance	✓
	Section 4.15 Security Considerations	✓
	Section 5.2 Air quality and emissions	✓
	Section 5.3 Biodiversity and geological conservation	✓
	Section 5.6 Dust, odour, artificial light, smoke, steam and insect infestation	✓
	Section 5.7 Flood Risk	✓
	Section 5.8 Historic Environment	✓
	Section 5.9 Landscape and Visual	✓
	Section 5.10 Land use including open space, green infrastructure & Green Belt	Refer to Section 6.10
Section 5.11 Noise and Vibration	✓	
Section 5.12 Socio-economic	✓	
Section 5.13 Traffic and Transport	✓	
Section 5.14 Waste Management	✓	
Section 5.15 Water quality and resources	✓	
National Policy Statement for Renewable Energy Infrastructure	Paragraph 2.3.3 regarding resilience to flood risk and drought.	✓
	Paragraph 2.5.9 regarding conformity to the waste hierarchy	✓
	Paragraph 2.5.13 regarding impacts resulting from an increase in throughput	✓

Document	Policy	Compliance
(EN-3) (July 2011)	Paragraph 2.5.24 regarding details of connection	✓
	Paragraph 2.5.25 regarding multi-modal transport of materials	✓
	Paragraph 2.5.26 to 2.5.27 regarding Combined Heat and Power	✓
	Paragraph 2.5.25 regarding EfW development in Green Belt	✓
	Paragraph 2.5.37 to 2.5.87 regarding assessments required as part of an EIA for an EfW NSIP.	✓
The National Planning Policy Framework (March 2012)	Policy 1 - Building a strong, competitive economy	✓
	Policy 7 – Requiring Good Design	✓
	Policy 9 – Protecting Green Belt Land	Refer to Section 6.10
	Policy 10 - Meeting the challenge of climate change, flooding and coastal change	✓
	Policy 11 - Conserving and enhancing the natural environment	✓
National Planning Policy for Waste (October, 2014)	The government's key planning objectives for sustainable waste management, requirements for waste plan-making authorities and the approach for the determination of planning applications.	✓
The Waste Management Plan for England (December, 2013)	A summary of the current waste management situation, gives guidance on site identification and summarises general waste management policies.	✓

## B2 Regional policy

### B2.1 The London Plan

Theme	Policy	Compliance
Waste	Policy 5.16 Waste Net Self-Sufficiency	✓
	Policy 5.17 Waste Capacity	✓
	Policy 5.18 Construction, excavation & demolition waste	✓
	Policy 5.19 Hazardous Waste	✓
	Policy 5.20 Aggregates	✓
Employment and Industry	Policy 2.13 Opportunity Areas and Areas of Intensification	✓
	Policy 2.17 Strategic Industrial Locations	✓
	4.1 Developing London's Economy	✓
	4.4 Managing Industrial Land and Premises	✓
	Policy 4.12 Improving opportunities for all	✓

Theme	Policy	Compliance
Traffic and Transport	Policy 6.3 Assessing Effects Of Development On Transport Capacity	✓
	Policy 6.9 Cycling	✓
	Policy 6.10 Walking	✓
	Policy 6.12 Road Network Capacity	✓
	Policy 6.13 Parking	Refer to Section 6.11
	Policy 6.14 Freight	✓
Sustainability	Policy 5.1 Climate Change Mitigation	✓
	Policy 5.2 Minimising Carbon Dioxide Emissions	✓
	Policy 5.3 Sustainable Design And Construction	✓
	Policy 5.5 Decentralised Energy Networks	✓
	Policy 5.6 Decentralised Energy In Development Proposals	✓
	Policy 5.7 Renewable Energy	✓
	Policy 5.8 Innovative Energy Technologies	✓
	Policy 5.9 Overheating And Cooling	✓
Contamination	Policy 5.21 Contaminated Land	✓
	Policy 5.22 Hazardous Substances And Installations	✓
Noise	Policy 7.15 Reducing Noise And Enhancing Soundscapes	✓
Air Quality	Policy 7.14 Improving Air Quality	✓
Water and Flood Risk	Policy 5.12 Flood Risk Management	✓
	Policy 5.13 Sustainable Drainage	✓
	Policy 5.14 Water Quality And Wastewater Infrastructure	✓
	Policy 5.15 Water Use And Supplies	✓
	Policy 7.24 Blue Ribbon Network	✓
	Policy 7.26 Increasing The Use Of The Blue Ribbon Network For Freight Transport	Refer to Water Transport Study in Appendix I of TA (AD05.11)
	Policy 7.27 Blue Ribbon Network: Supporting Infrastructure And Recreational Use	✓
	Policy 7.28 Restoration Of The Blue Ribbon Network	✓
	Policy 7.30 London's Canals And Other Rivers And Waterspaces	✓
Greenbelt	Policy 7.16 Green Belt	Refer to Section 6.10

Theme	Policy	Compliance
Landscape and Biodiversity	Policy 2.18 Green Infrastructure: the network of open and green spaces	✓
	Policy 5.10 Urban Greening	✓
	Policy 5.11 Green Roofs And Development Site Environs Requires major development proposals to include roof	✓
	Policy 7.19 Biodiversity And Access To Nature	✓
	Policy 7.21 Trees And Woodlands	✓
Design	Policy 7.2 An Inclusive Environment	✓
	Policy 7.3 Designing Out Crime	✓
	Policy 7.4 Local Character	✓
	Policy 7.6 Architecture	✓
	Policy 7.7 Location And Design Of Tall And Large Buildings	✓
	Policy 7.13 Safety, Security And Resilience To Emergency	✓
Archaeology	Policy 7.8 Heritage Assets And Archaeology	✓
Geological Conservation	Policy 7.20 Geological Conservation	✓
Planning Obligations	Policy 8.2 Planning Obligations	✓

## B2.2 Other regional policy

Document	Policy	Compliance
Upper Lee Valley Opportunity Area Planning Framework (July 2013)	Objective 1: Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponder's End;	✓
	Objective 6: A Lee Valley Heat Network linked to the Edmonton EcoPark.	✓
London's Wasted Resource London's Municipal Waste Management Strategy (November 2011)	Policy 1: informing producers and consumers of the value of reducing, reusing and recycling municipal waste	✓
	Policy 2: reducing climate change impacts of London municipal waste management	✓
	Policy 4: achieving high recycling and composting rates resulting in the greatest environmental and financial benefits	✓
	Policy 5: stimulating development of new municipal waste management infrastructure, particularly low carbon technology	✓

Document	Policy	Compliance
Making Business Sense of Waste: The Mayor's Business Waste Management Strategy	Mayor's strategy for London's business waste.	✓
Managing Risks and Increasing Resilience The Mayor's Climate Change Adaptation Strategy (October 2011)	Strategic approach to managing the climate risks being faced in the capital now and in the future.	✓
Delivering London's Energy Future: The Mayor's Climate Change Mitigation And Energy Strategy (October 2011)	Strategic approach to limiting further climate change and securing a low carbon energy supply for London.	✓
Mayor's Sustainable Design and Construction Supplementary Planning Guidance (April 2014)	The mayor's priorities in delivery high quality design and construction in a range of areas, including noise, air quality, flood risk, energy and site layout.	✓
Mayor's Transport Strategy (May 2010)	The transport vision for London and details how Transport for London and partners will deliver the plan over the next 20 years.	✓
Clearing the air: the Mayor's Air Quality Strategy (December 2010)	Mayoral ambitions for air quality in the capital, including aims to reduce health impacts and increase quality of life through encouraging cleaner air in London.	✓
Securing London's water future: The Mayor's Water Strategy (October 2011)	Key requirements and issues surrounding water in the capital	✓
The Mayor's Economic Development Strategy for London (May 2010)	The Mayor's objectives for the London economy	✓

## B3 Sub-regional Policy

Document	Policy	Compliance
Draft North London Waste Plan (on-going)	Identifies sites for waste management use for north London's waste up to 2031 and sets out policies for determining relevant planning applications.  It is proposed that Edmonton EcoPark will be included in the NLWP as an existing waste site.	✓

## B4 Local policy

### B4.1 Enfield Plan Core Strategy 2010-2025

Theme	Policy	Compliance
Employment and Industry	Core Policy 1 Strategic Growth Areas	✓
	Core Policy 13 Promoting Economic Prosperity	✓
	Core Policy 14 Safeguarding Strategic Industrial Locations	✓
	Core Policy 17 Town Centres	✓
Sustainability	Core Policy 20 Sustainable Energy Use and Energy Infrastructure	✓
	Core Policy 21 Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure	✓
	Core Policy 22 Delivering Sustainable Waste Management	✓
Transport	Core Policy 24 The Road Network	✓
	Core Policy 25 Pedestrians and Cyclists	✓
	Core Policy 26 Public Transport	✓
	Core Policy 27 Freight	✓
Flood Risk and Management	Core Policy 28 Managing Flood Risk Through Development	✓
	Core Policy 29 Flood Management Infrastructure	✓
Design	Core Policy 30 Maintaining and Improving the Quality of the Built and Open Environment	✓
	Core Policy 31 Built and Landscape Heritage	✓
Pollution	Core Policy 32 Pollution	✓
Landscape and Environment	Core Policy 33 Greenbelt and Countryside	Refer to Section 6.10
	Core Policy 34 Parks, Playing Fields and Other Open Spaces	✓
	Core Policy 35 Lee Valley Regional Park and Waterways	✓
	Core Policy 36 Biodiversity	✓

Theme	Policy	Compliance
Area specific policies	Core Policy 37 Central Leaside	✓
	Core Policy 38 Meridian Water	✓
Developer Contributions	Core Policy 46 Infrastructure Contributions	✓

## B4.2 Enfield Development Management Document

Theme	Policy	Compliance
Employment and Industry	DMD 19 Strategic Industrial Locations	✓
	DMD 23 New Industrial Development	✓
Design	DMD 37 Achieving High Quality and Design-Led Development	✓
	DMD 38 Design Process	✓
	DMD 43 Tall Buildings	✓
	DMD 44 Conserving and Enhancing Heritage Assets	✓
Transport	DMD 45 Parking Standards and Layout	Refer to Section 6.11
	DMD 46 Vehicle Crossovers and Kerbs	✓
	DMD 47 Access, New Roads and Servicing	✓
	DMD 48 Transport Assessments	✓
Sustainability	DMD 49 Sustainable Design and Construction Statements	✓
	DMD 50 Environmental Assessment Methods	✓
	DMD 51 Energy Efficiency Standards	✓
	DMD 52 Decentralised Energy Networks	✓
	DMD 53 Low and Zero Carbon Technology	✓
	DMD 54 Allowable Solutions	✓
	DMD 55 Use of Roof Space/Vertical Surfaces	✓
	DMD 56 Heating and Cooling	✓
	DMD 57 Responsible Sourcing of Materials, Waste Minimisation and Green Procurement	✓
DMD 58 Water Efficiency	✓	
Contamination	DMD 66 Land Contamination and Instability	✓
	DMD 67 Hazardous Installations	✓
Noise	DMD 68 Noise	✓
Light pollution	DMD 69 Light Pollution	✓
Air Quality	DMD 64 Pollution Control and Assessment	✓



Theme	Policy	Compliance
	DMD 65 Air Quality	✓
Flood Risk	DMD 59 Avoiding and Reducing Flood Risk	✓
	DMD 60 Assessing Flood Risk	✓
	DMD 61 Managing Surface Water	✓
	DMD 62 Flood Control and Mitigation Measures	✓
	DMD 63 Protection and Improvement of Watercourses and Flood Defences	✓
Water Quality	DMD 70 Water Quality	✓
Landscape and Biodiversity	DMD 75 Waterways: Waterfront Character and Access to Waterways	✓
	DMD 76 Wildlife Corridors	✓
	DMD 77 Green Chains	✓
	DMD 78 Nature Conservation	✓
	DMD 79 Ecological Enhancements	✓
	DMD 80 Trees on Development Sites	✓
	DMD 81 Landscaping	✓
Green Belt	DMD 82 Protecting the Green Belt	Refer to Section 6.10
	DMD 83 Development Adjacent to the Green Belt	✓
	DMD 89 Previously Developed Site in the Green Belt	✓

### B4.3 Other local policy

Document	Policy	Compliance
Proposed Submission Central Leaside Area Action Plan (published for consultation January 2015)	Objective 4: Delivering Sustainable Regeneration	✓
	Chapter 8 Edmonton EcoPark	✓
	Policy CL22: Redevelopment of the EcoPark site	✓
	Policy CL30: The Lee Valley Heat Network	✓
Edmonton EcoPark Planning Brief (supplementary planning document to the Local Plan, May 2013)	The opportunities and constraints for the development of new waste management and other facilities on the site, and the principles which these should follow.	✓
Section 106 Supplementary Planning Document (November 2011)	The requirements for S106 agreements in LB Enfield, including circumstances in which a S106 agreement is likely to be required; and details on the type and level of contribution necessary	✓



Series 05 Technical Documents

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