

## 4.4 Environment

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

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

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

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Environment</b>								
							measures will be set out in the environmental impact assessment.	
4.4.3	Concern regarding CO <sub>2</sub> and NO including the following comments; a) will be high; b) should be minimised; c) comply with London Plan carbon targets; d) the NO <sub>x</sub> scrubber would not be efficient in removing the NO <sub>x</sub> gas.	GLA	LBE	-	3	38, 42, 10028	The ERF must comply with stringent emission standards set by the Environment Agency. The replacement facility would have even better emission control technology than the existing plant does now. The proposed ERF would use the best currently available technology to clean flue gas and reduce NO <sub>x</sub> emissions. The scheme would include Selective Catalytic Reduction which is the most effective available treatment available for NO <sub>x</sub> .	N
4.4.4	Concern regarding particulates in particular the impact on those with chronic obstructive pulmonary disease (COPD).	-	-	-	1	27	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> .  The environmental impact assessment will include consideration of fine particulate matter.  A <i>Health Impact Assessment</i> is also being undertaken for the scheme and will form part of the DCO application.	N
4.4.5	Concern regarding accident-related air pollution. Questioned what bulk elements will be stored on site.	-	-	-	2	6, 10018	No dangerous volatile materials are expected to be stored in large quantities on-site.	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Environment</b>								
4.4.6	Concern regarding cumulative impact when combined with North Circular Road pollution.	-	-	-	1	24	<p>The proposed ERF is a replacement of an existing facility. The air quality assessment will set out the effects of the Project on the existing air quality conditions of the site and surrounding area (taking into consideration impacts that the North Circular has on the air quality).</p> <p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i>.</p>	N
4.4.7	Concern regarding emissions during demolition including release of contaminants and release of dust containing asbestos/heavy metals during demolition.	-	LBE	-	1	25	<p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i>. This will include details of the demolition and construction works and appropriate mitigation measures will be included in the <i>Code of Construction Practice</i> which will be available during Phase Two Consultation.</p>	N
4.4.8	Concern regarding emissions during start-up and shut-down period.	-	-	-	1	6	<p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i>. Worst case emissions will be assessed to ensure all impacts are considered, including those during start up and shut down.</p>	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Environment</b>								
4.4.9	Concern regarding emissions/dust from transport vehicles including the cumulative with existing pollution.	-	-	-	5	17, 24, 45, 46, 10006	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> .  An assessment of traffic generated from the development, including vehicle exhaust emissions and dust emissions from transport will be included. Appropriate measures to control emissions/dust during construction will be included in the <i>Code of Construction Practice</i> which will be available during Phase Two Consultation.	N
4.4.10	Request to prioritise low emissions and aim for zero pollution.	-	-	-	7	21, 25, 36, 37, 41, 44, 10018	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase Two the emerging findings of this assessment will be available in the <i>PEIR</i> being undertaken for the scheme. Best available measures to reduce emissions to air will be included in the scheme design, for example, within the <i>Code of Construction Practice</i> which will be available during Phase Two Consultation.	N
4.4.11	No air quality concerns. Comments that it would have minimal impact and will reduce emissions compared to existing site.	-	WCC	-	4	17, 39, 50, 10006	Noted	-
4.4.12	Suggest mitigation measures including low-emission	-	-	-	3	21, 24, 38	The majority of vehicles visiting the Edmonton EcoPark are those owned and operated by the north London boroughs and as such it are outside the	N

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<b>Environment</b>								
	vehicles and carbon capture technology.						control of the applicant. A small number of vehicles are owned and operated by LondonWaste Limited (who operate the site on behalf of NLWA) and the future requirements for these vehicles would be kept under review.  A initial review of carbon capture and storage technologies has found that such technology remains unproven for this type of operation and is current not financially viable.	
<b>Visual impact</b>								
4.4.13	Concerns about the visual impact of the scheme including: facility will have high visibility; impact on Green Belt; impact on LVRP and Navigation Corridor; landscaping proposals not sufficient.	-	LBE	LVRPA*	1	9	The environmental impact assessment for the scheme will include a visual impact assessment that uses agreed representative viewpoints from sensitive receptors to assess the effects of the proposed development. These sensitive receptors will include both residential and recreational receptors including the LVRP and Navigation Corridor and will be agreed with stakeholders. The proposed development is being designed to take account of visual impact and landscaping.	N
4.4.14	Removal of the Camden Aggregates site will increase visual impact of proposed ERF.	-	LBE	-	1	26	The Camden Aggregates <sup>12</sup> site is not within the control of the applicant. The environmental impact assessment for the scheme will include a visual assessment that uses representative viewpoints from sensitive receptors to assess the effects of the proposed development. These viewpoints will take into account the potential removal of the material storage mounds currently located on the Camden Aggregates site.	N

<sup>12</sup> Camden Aggregates is referred to as Camden Plant Ltd elsewhere in the Application.

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<b>Environment</b>								
Impact on ecology/wildlife								
4.4.15	Concern about impact on ecology/wildlife including: a) loss of vegetation and habitat in north/east of site; b) impact on Salmons Brook, Lee Navigation Corridor, SSSI, Tottenham Marshes, Lee Park Way; c) impact on habitat connectivity; d) impact of construction on natural habitats; e) not covered sufficiently in EIA.	-	LBE	LVRPA*	2	12, 50	The impact of the proposed development on ecology will be considered within the environmental impact assessment.  A Habitats Regulation Assessment screening (HRA) is also being undertaken and will be available during Phase Two Consultation. The HRA screening will identify any potential significant effects on European designated sites. Appropriate ecological measures will be included in the scheme design, including the Code of Construction Practice.	N
4.4.16	Concern regarding impact of light pollution on ecology/wildlife.	-	LBE	LVRPA*	0	-	The impact of the proposed development on ecology will be considered within the environmental impact assessment. This will include consideration of light pollution on ecology/wildlife. During Phase Two the emerging findings of this assessment will be available in the PEIR.  The Code of Construction Practice for the scheme will include measures regarding lighting during construction.	N
4.4.17	Suggested mitigation measures including: a) increase viable habitat on/around the site and	-	LBE	LVRPA*	1	10010	Appropriate ecological measures will be included in the scheme design, including the Code of Construction Practice. These measures will be summarised in the ecology Section of the Environmental Statement.	N

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<b>Environment</b>								
	include in landscaping strategy; b) set back main massing from eastern edge; c) dark corridor along Lee Park Way/Navigation; d) provision of Living Walls.							
<b>Noise pollution</b>								
4.4.18	Concerns regarding noise pollution including traffic noise, lorry alarms, long operating hours and noise from air cooled condenser.	-	-	-	5	6, 25, 46, 54, 10006	The impact of the proposed development on noise will be considered within the environmental impact assessment. This will include an assessment of construction and operational road traffic noise. Target noise criteria for operational plant will be specified in the Environmental Statement. The Code of Construction Practice for the scheme will include measures regarding the management of noise during construction.	N
4.4.19	Request to keep construction noise as low as possible to reduce impact on residents.	-	-	-	4	16, 22, 24, 45	The impact of the proposed development on noise will be considered within the environmental impact assessment. The Code of Construction Practice for the scheme will include measures regarding the management of noise during construction.	N
<b>Water pollution/flood risk</b>								
4.4.20	Concerns regarding water pollution and flood risk including: a) potential contamination of water courses/reservoir/ ecosystem; b) pollution from water-borne freight;	GLA TWU L*	LBE	-	3	6, 27, 39	The impact of the proposed development on water resources will be considered within the environmental impact assessment. A Flood Risk Assessment is also being undertaken for the scheme which will be appended to the Environmental Statement.	N

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<b>Environment</b>								
	c) surface water drainage issues; d) flood risk.						The Code of Construction Practice for the scheme will include measures to protect surface and ground water during construction.	
4.4.21	Suggested mitigation measures including: a) comply with London Plan surface water drainage hierarchy; b) rainwater harvesting system; c) liaise with EA; d) apply for Trade Effluent Consent; e) seek groundwater discharge permit; f) take account of required pipe pressure; g) fit petrol/oil interceptors on facilities; h) fat trap in catering areas; i) waste oil collection and recycling into biodiesel.	GLA TWU L*	LBE	-	0	-	The impact of the proposed development on water resources will be considered within the environmental impact assessment, the approach for which has been agreed with the Environment Agency. The Environmental Statement will include the identification of appropriate mitigation measures if required. The Code of Construction Practice for the scheme will include measures to protect surface and ground water during construction.  All necessary consents required for the operation of new facilities, such as Trade Effluent Consent and groundwater discharge consent where required would be secured in advance.  It is not intended to accept waste oil on site except that received from householders at the Reuse and Recycling Centre which will be sent to an appropriate reprocessor.	N
<b>Impact on health/safety</b>								
4.4.22	Protect public from dangers posed by electrical equipment and comply with regulations.	HSE	-	-	0	-	Safety on site would be assisted by the separation of public access areas from the operational zone. Public access to the site would be carefully managed. Electrical equipment would comply with all applicable regulations.	N
4.4.23	Check whether Hazardous Substances Consent is	HSE	-	-	0	-	The operations would be required to comply with all relevant consents and regulations including those	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Environment</b>								
	required and comply with regulations.						relating to the use, storage, and treatment/disposal of hazardous substance.	
4.4.24	Comments regarding the health impact of emissions including concern regarding cancer generally, respiratory cancer and asthma, impact on individual with COPD, request for evidence and stricter emission controls may be required.	-	-	-	7	22, 24, 27, 29, 38, 10003, 10006	Current best available technology would be used to ensure emissions are reduced as far as practicably possible. A Health Impact Assessment is also being undertaken for the scheme and a draft will be available during Phase Two Consultation.	N
4.4.25	Comply with all regulations and refer to HSE website.	HSE	-	-	0		The Project would comply with all applicable regulations.	N
<b>Odour</b>								
4.4.26	Concern regarding odour including: a) odour comes from current site; b) unsure where odour originates from; c) odour will increase in new location for Russell Road resident; d) conduct odour assessment.	-	LBE	-	6	22, 23, 24, 25, 54, 10003	The impact of the proposed development on odour will be considered within the environmental impact assessment. Odour controls would be fitted to the site and some odorous processes on the existing site would be removed as part of the development. It is expected that there would be a considerable improvement in odour conditions at the site.	N
4.4.27	Odour will be minimised due to removal of composting facility.	-	-	-	1	10006	Noted.	-
4.4.28	Suggested mitigation measure to use filters to minimise odours.	-	-	-	1	23	Appropriate odour controls would be fitted to the plant to meet Environment Agency requirements.	N

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<b>Environment</b>								
Impact on climate change								
4.4.29	Concern regarding impact on climate change and request that this is assessed. Comments include: a) minimise carbon emissions conform with Enfield's Spatial Vision and Strategic Objective 2; b) not covered in documents so far; c) conduct full analysis of implications of proposal and alternatives;	-	LBE	-	3	21, 38, 10028	The applicant is carrying out assessments using the WRATE life-cycle software, an Environment Agency tool for assessing the environmental impact of proposed developments or facilities. The assessment will consider the impacts of the proposed ERF, which will include carbon impact assessments.  The proposal has sought to minimise carbon emissions through good design. The Sustainability Statement to be submitted as part of the DCO application will set out more details on this.	N
	minimise embodied carbon during construction.						The embodied carbon is assessed as part of the BREEAM assessment which will form part of the DCO application.	N
4.4.30	Query if the scheme will reduce climate change impact and meet Carbon Intensity Floor target	GLA	-	-	-	-	The Sustainability Statement which will form part of the DCO application will identify a carbon intensity target for ancillary buildings on site taking into account London Plan targets and future zero carbon building regulations.	N
General/other environmental impact								
4.4.31	Request to minimise environmental impact and statement that impact is being underplayed	-	-	LVRPA*	7	11, 16, 21, 22, 24, 28, 50	The environmental impact assessment will assess the environmental effects associated with the scheme development. This will identify if there are any likely significant environmental effects and mitigation will be identified where required. Effects will be minimised through environmental design input and measures contained within the Code of Construction Practice for the scheme.	N
4.4.32	Positive impact/ will minimise/reduce environmental impact. Comments include:	-	WCC	-	7	8, 28, 37, 39, 43, 10002, 10006		-

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Environment</b>								
	a) less fossil fuel reliance; b) provision of power to homes; c) modern technologies.							
4.4.33	Other concerns including: effluent from wet treatment of flue gases; leaks; litter from waste vehicles; fly tipping.	-	-	-	5	6, 17, 22, 23, 25	The environmental impact assessment will assess the environmental effects associated with the scheme development. The site would be subject to on-going good site management.	N
4.4.34	Suggested mitigation measures including: a) align with London Plan; b) robust CoCP; c) support green charities; d) recycle/re-use materials from old plant.	GLA	LBE	-	3	36, 48, 10019	London Plan policies are being taken into consideration in the development of the design. The environmental impact assessment will assess the environmental effects associated with the scheme development, identifying appropriate mitigation measures where required. Such measures will be incorporated into the proposed development design and be contained within the <i>Code of Construction Practice</i> for the scheme. In line with good waste minimisation practice the demolition of the existing EfW facility would seek to recycle and reuse as many materials as possible.	N
<b>Further assessments required</b>								
4.4.35	Requests for further assessments including: a) carbon assessments; b) climate change analysis for proposal and alternatives;	NE GLA TWU L*	LBE	LVRPA*	5	6, 29, 38, 10016, 10028	The environmental impact assessment will assess the environmental effects associated with the scheme development including effects on air quality and odour (which will examine the impacts of the plant against UK and European Air Quality Standards that are largely based on WHO proposals), ecology, ground conditions and contamination, noise and vibration, socio-	N

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Environment</b>								
	c) noise studies including impact on sensitive receptors; d) local health impact of emissions; e) protected species survey; f) air pollution assessments using WHO levels; g) visual impact study; h) flood risk assessment; i) cumulative impact assessment; j) assessment of effects of increased water demand, waste treatment and surface water.						economics, visual impact, traffic and transport, water resources, environmental wind and daylight, sunlight and overshadowing. Appropriate receptors will be considered for each of the environmental topic assessments. A cumulative effects assessment will be undertaken for all environmental topics.  Supplementary studies also include a flood risk assessment (taking climate change into account) and health risk assessment.  Based on our assessment, we considered, that an ERF is the most suitable technology to manage North London's residual waste. It is not practical to undertake climate change analysis on all alternatives, however having determined the most suitable technology an analysis of potential climate change impacts is being undertaken and will be set out in the <i>Sustainability Statement</i> which will form part of the DCO application.	
No concerns/mitigation measures are sufficient								
4.4.36	No concerns/measures sufficient/ will provide more detailed comments after HRA/EIA.	NE GLA	WCC	-	16	5, 16, 18, 19, 25, 26, 37, 40, 41, 45, 47, 52, 10008, 10009, 10019, 10020	Noted.	-

### **Account taken of Phase One environment comments**

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