

4.5 Need

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

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

Ref	Comment	PC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Need for a replacement facility								
Reasons for support								
4.5.2	General support, no reasons stated.	-	WCC HBC	LWL	21	5, 8, 17, 18, 19, 21, 25, 26, 27, 31, 40, 41, 43, 44, 45, 46, 10006, 10008, 10009, 10018, 10020	Support for the scheme is noted and welcomed.	-
4.5.3	Support because the current facility is reaching the end of its life.	-	-	LWL	3	5, 6, 16		-
4.5.4	Support because less waste will be sent to landfill.	GLA	-	LWL	0	-		-
4.5.5	Support because the new technology would allow waste to be treated more efficiently.	GLA	WCC LBE	LWL LVRP A*	6	19, 25, 33, 37, 10006, 10008		-
4.5.6	Support because the new technology is more environmentally-friendly.	-	WCC	-	8	8, 16, 18, 28, 37, 43, 54, 10006		-
4.5.7	Support because the new technology is future-proof and will not become outdated soon.	-	-	-	1	16		-

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Need for a replacement facility								
4.5.8	Support because it encourages recycling by increasing the recycling capacity.	GLA	HBC	-	3	35, 39, 10019		-
4.5.9	Support if the financial gains are secured through competitive gate fees, economies of scale and reduced reliance on gas imports. Perceived as good value for the residents of North London.	-	WCC	LWL	1	8		-
4.5.10	Support because it meets future demand. Population and waste volumes are growing.	GLA	WCC	LVRP A*	0	-		-
4.5.11	Support because it makes use of existing site and workforce.	GLA	-	LWL	4	5, 9, 52, 10005		-
4.5.12	Support promotes waste and net self-sufficiency.	GLA	-	-	0	-		-
4.5.13	Support because more waste will be managed closer to source. This in turn would minimise travel.	GLA	WCC	-	2	47, 52		-
4.5.14	Other reasons for support include serving as a flagship project, avoiding Pinkham Way, protecting current and providing future job opportunities and delivering integrated waste management service.	-	WCC	-	2	10005, 10006		-
4.5.15	Support with the following caveats: a) should not disturb the local community and environment, b) should not discourage recycling,	-	LBE	-	8	9, 23, 25, 28, 36, 42, 47, 50		Support for the scheme is noted and welcomed. All of the caveats noted are supported by the NLWA and further responses are set out in the remainder of the table.

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Need for a replacement facility								
	<p>c) should be cost and energy efficient</p> <p>d) should use future-proof technology</p> <p>e) should demonstrate it provides sustainable and efficient solution that meets all policy requirements.</p>						More detailed information on the design of the ERF will be available during Phase Two Consultation.	
Reasons for challenging the proposed facility								
4.5.16	Oppose because residents will not benefit.	-	-	-	3	24, 48, 53	<p>NLWA is proposing a cost effective waste disposal solution which would benefit all residents of north London for the cost of waste management paid for through the council tax.</p> <p>The replacement ERF would provide a solution to the whole of north London's waste left over after recycling. During Phase One Consultation the applicant sought views on what would help in the local area and a number of suggestions were made, such as landscaping and a visitors centre. These are described in more detail in the 'Community Benefits' table.</p>	N
4.5.17	Negative impact on recycling/re-use/prevention. Incineration should be a last resort.	-	-	-	9	9, 36, 38, 47, 5310016, 10021, 10025, 10031*	<p>NLWA is committed to the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting, and has active programmes to encourage waste prevention, re-use and recycling. The NLWA's "Wise up to Waste" campaign</p>	N

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Need for a replacement facility								
							has more details of this activity (See: http://www.wiseuptowaste.org.uk/). The need case is based on the central recycling scenario of 50%, which is considered to be an appropriate target for modelling purposes, and consistent with existing strategy. The forecasting methodology gives a lower estimate of residual waste arisings over the period than if we had used population growth (which is the basis of the GLA estimates).	
4.5.18	NLWA should have demonstrated why alternatives have been rejected. Focus should be on other more-environmentally friendly waste management methods.	-	-	-	2	38, 10016	Based on our assessment, we considered that an ERF is the most suitable technology to manage North London's residual waste, that is, waste remaining after waste reduction and recycling activity. Details of our assessment process will be set out in the <i>Alternatives Assessment Report</i> which will be available during Phase Two Consultation.	N
4.5.19	Overcapacity due to higher than assumed waste arisings and achieving higher than assumed recycling targets across household, commercial and industrial and other waste.	-	-	-	7	6, 38, 53, 54, 10016, 10021, 10025	The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50% recycling rate for household waste. The methodology is clearly set out in the <i>Need Assessment</i> document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In developing the forecasts various scenarios were considered.	N

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Need for a replacement facility								
							The forecasting methodology gives a lower estimate of residual waste arisings over the period than if we had used population growth (which is the basis of the GLA estimates).	
4.5.20	Overcapacity will lead to the ERF seeking to become provider of waste services to a wider area. Concerns that this is not viable and/or not in interest of the local community and would discourage other boroughs from seeking local solutions to waste management.	-	-	-	3	53, 10016, 10021	<p>Should the amount of residual waste collected by the NLWA boroughs be less than assumed in the ERF sizing then the ERF would have spare capacity. If this were to be the case then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility.</p> <p>To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by the NLWA boroughs in the future would not be in the interests of the local community due to the risk that this waste would have to be treated or diverted to landfill outside the area in contravention of the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.</p>	N
4.5.21	Flaws in waste forecasting approach including: a) does not look into other forecasting scenarios b) uses wrong/unreliable data.	-	-	-	3	10016, 10021, 10024	The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50% recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In considering the	N

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Need for a replacement facility								
							forecasts various scenarios were considered. No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically-available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection which uses population growth as the basis.	
4.5.22	Waste arisings forecast inconsistent with the North London Waste Plan (NLWP).	-	LBE	-	3	38, 10016, 10025	The North London Waste Plan is a separate process, and is a land use Plan, agreed by the seven boroughs in their capacity as local planning authorities. It is understood, through liaison with the NLWP process, in which the NLWA is a key stakeholder that the NLWP data studies will take into account the forecasting carried out for this Project. The NLWP is due for consultation in the summer of 2015, and the Edmonton	N
4.5.23	Lack of integration with other strategies and the partner authorities are inconsistent in their waste and recycling targets. The proposed approach could result in some waste processes being outsourced.	-	-	-	2	10016, 10021		N

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Need for a replacement facility								
							<p>EcoPark, as a protected waste management site, is expected to be listed in that plan. The scheme proposed is consistent with the Joint Waste Strategy of the NLWA and seven north London Boroughs. In developing these proposals, NLWA has been working with the seven boroughs as its partners.</p> <p>The scheme is being brought forward to replace the existing EfW facility and ensure continued sustainable treatment of north London's residual waste.</p> <p>The applicant has consulted with partner authorities, including the seven NLWA boroughs, on the use of recycling target assumptions in the modelling.</p> <p>Waste treatment operations which would be discontinued to make way for the new development would be sought from third party suppliers. These may be reinstated on site in the long term, subject to planning and permitting, but as yet no decisions have been made to do so.</p>	
4.5.24	Concern regarding waste forecasting including insufficient/incomplete assessments and no financial, risk or carbon comparative analysis. Also it is not clear how the proposal has been formally assessed by the partner authorities.	-	-	-	2	10016, 10028	<p>A WRATE (an Environment Agency tool for environmental assessment) assessment which includes covers carbon comparative analysis is currently being undertaken and will be available at Phase Two Consultation.</p> <p>Further cost information will be available at Phase Two Consultation but will remain subject to detailed design after the Development Consent Order (DCO) application has been determined.</p>	N

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Need for a replacement facility								
							Decisions are made by NLWA which is made up of 14 councillors, two from each of the seven constituent boroughs. In developing this scheme, NLWA has been working with the seven boroughs as its partners.	
4.5.25	Reduces availability of land and therefore does not conform with the Authorities' position to reduce land by co-locating facilities.	-	-	-	2	10016, 10021	The ERF would be located within the Edmonton EcoPark on a part of the site currently used for other waste treatment facilities. The whole Edmonton EcoPark site is designated for waste use. Once the ERF is commissioned and operational, other waste management uses would be considered for the area on which the existing plant now stands, which would then be vacant, taking account of waste management needs at that time but subject to separate planning process if pursued in future.	N
4.5.26	The ERF is too close to residents.	-	LBE	-	4	22, 24, 25, 10003	The ERF would be located at the Edmonton EcoPark which is an existing waste site safeguarded for future waste use in the London Plan. Regional policies promote self-sufficiency of waste management within London, and therefore because of the density of development in London, waste management sites would not be set in open space. The nearest residential properties are 600m to the east and west of the site. The likely significant effects at sensitive receptors, such as residential areas, will be considered as part of the environmental impact assessment which will be reported in the Environmental	N

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Need for a replacement facility								
							Statement which forms part of the DCO application.	
4.5.27	Concerns about the environmental effect of the required feedstock.	-	-	-	2	10016, 10021	The ERF would be fed with residual waste collected by the NLWA authorities from household, C&I and other sources (e.g. fly-tipping, highways etc.). Should there be spare capacity, then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility. This waste would only be secured by offering competitive gate fees and would generate an income for the NLWA.	N
4.5.28	Concerns about impact on nearby developments.	-	LBE	-	1	52	<p>The site is a protected waste management site, and this will be clear to other developers in the area through the strategic/planning plans and policies for the area and site. Its use as a waste management site will be taken into account by other developers in assessing their own proposals. There will be the potential for nearby development wherever a waste site is located.</p> <p>The likely significant effects of the scheme on nearby developments is considered as part of the cumulative assessment in the environmental impact assessment will be reported in the Environmental Statement which forms part of the DCO application.</p>	N

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Need for a replacement facility								
4.5.29	Concerns about cost including: a) financial implication of overcapacity	-	LBE	-	3	38, 10016, 10021	Should there be spare capacity, then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility.	N
	b) need for carbon capture facilities.						An initial review of carbon capture and storage technologies has found that such technology remains unproven for this type of operation and are current not financially viable.	N
Alternatives								
4.5.30	Flexible approach that allows the ERF to expand as and if required.	-	-	-	2	10016, 10021	Based on our assessment the ERF is the optimum size taking into account the forecast waste arisings and NLWA's obligation to put in place arrangements to deal with residual waste collected in its area without being able to be certain about how much there would be. It is not anticipated that significant additional capacity would be required during the lifetime of the ERF, however should this be the case a new application would be required.	N
4.5.31	Suggest the following as alternatives: anaerobic digestion, pyrolysis and the 'Norfolk solution' i.e. making bricks and road surfacings.	-	-	-	1	10031*	Based on our assessment, we considered, on balance that an ERF is the most suitable technology to manage North London's residual waste. Details of our assessment process are set out in the Alternatives Assessment Report which will be available during Phase Two Consultation.	N

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Need for a replacement facility								
							<p>Anaerobic digestion is one of the methods of treating organic waste. NLWA is already treating organic waste as part of its recycling activity. Pyrolysis is considered in the Alternatives Assessment Report.</p> <p>The Applicant, through a contractor in site, already produces building material and aggregates from bottom ash produced by the existing EfW facility. However, the Applicant is unaware of any technology capable of creating bricks and road surfacing directly from 'residual arisings' due to its chemical and physical properties. In order to create building materials, residual waste must first be treated to produce an inert material with little or no organic and combustible content. This is achieved through thermal processing, either through gasification or incineration, to leave only ash and inerts. After this, building products may be produced through either refinement (as is standard practice for bottom ash), binding with a cement type material to create blocks, or vitrification (melting at a high temperature) to produce a glass like aggregate.</p>	
4.5.32	Dual capability to be considered if there is less waste fuel in the future.	-	-	-	1	10019	<p>We understand dual capability to mean the ability to process more than one type of fuel. It is not practical or economical to design facilities an ERF at this scale to have dual capability.</p> <p>Based on our assessment, we considered, that an ERF is the most</p>	N

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Need for a replacement facility								
							suitable technology to manage North London's residual waste. Details of our assessment process will be set out in the Alternatives Assessment Report which will be available during Phase Two Consultation.	
Lee Valley Heat network								
4.5.33	General support including, support for low-carbon, inexpensive heat used locally, preference to spent money on this than on landscaping and request for confirmation that heat would be supplied to the Lee Valley Heat Network.	GLA	WCC LBE	-	6	18, 42, 47, 53, 10019, 10031*	The scheme is designed to deliver both heat and electricity. The proposals also safeguard space for an energy centre on site (to be brought forward by the Lee Valley Heat Network (LVHN)) and for pipework to leave the site. The NLWA is working closely with the promoters of the LVHN to develop proposals for the heat from the ERF to be used as part of the heat network.	N
Timeline								
4.5.34	Timeline is reasonable.	-	-	-	1	43	Support for the timeline is noted and welcomed.	-
4.5.35	Questions about the duration of the construction stage such as when will the works begin and how long will they last.	-	-	-	1	24	Further detailed timescales including phasing will be provided at Phase Two Consultation.	-
Criteria								
4.5.36	Should be cost-efficient	GLA	-	-	4	21, 23, 28, 39	The NLWA's Outline Business Case (OBC) identified ERF/EFW as the most cost effective option for the treatment of North London's residual waste.	N
4.5.37	Should be modern/efficient	-	LBE	-	2	16, 45		N

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Need for a replacement facility								
4.5.38	Should be future proof/upgradable	-	-	-	3	9, 28, 42	<p>The ERF would be built using today's most advanced technology. It would be one of the most effective of its kind by current standards.</p> <p>We are seeking sufficient flexibility within the DCO application to be able to assess the detailed solution before procurement allowing potential upgrading at this point. Future flexibility would also be required to respond to potential future regulatory change.</p>	N
Further studies are required								
4.5.39	Request studies that ensure that no National Grid's apparatus would be affected.	NG	-	-	0		We are assessing all utilities which are required for the site or affected by the proposals as part of scheme development. As part of this we are liaising with UKPN who consult National Grid as part of the process.	N
4.5.40	Request strategic, financial and risk assessment of both the proposed ERF and any alternative scenarios.	-	LBE	-	2	10016, 10021	Based on our assessment, including cost of technologies available for management of waste at this scale, we considered, that an ERF is the most suitable technology to manage North London's residual waste. Details of our assessment process are set out in the Alternatives Assessment Report which will be available during Phase Two Consultation. Further financial and risk assessment will take place before any procurement is carried out.	N

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Need for a replacement facility								
Other								
4.5.41	Request for the ERF to remain in public ownership.	-	-	-	1	10031*	The site is currently owned by LondonWaste Limited, a company owned by NLWA and therefore in public ownership The site will continue to be in public ownership unless a change, for example to legislation, required otherwise.	N

Account taken of Phase One need comments

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