

6.12 Consultation process

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

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

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

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Views on the consultation process								
							proposals. Written responses in the form of e-mails and letters were also accepted. There were a range of ways in which feedback forms could be submitted including online, completing a hard copy at an exhibition or posting a hard copy to the FREEPOST address.	
6.12.4	Respondents were unaware of the first stage of the consultation.	CRT	-	-	1	10087	Canal and River Trust (CRT) were notified of Phase One Consultation by letter. Two meetings were also held as part of the Applicant's informal consultation between February and May 2015. Phase One Consultation was undertaken in accordance with our published Statement of Community Consultation. It was advertised in all seven north London boroughs and widely in the newsletter zone (1,500m radius around the Edmonton EcoPark) through adverts, newsletters, leaflets to libraries and schools.	N
6.12.5	Request for the duration of the Phase Two Consultation to be extended as not enough time was provided to analyse the carbon floor modelling.	-	-	-	1	88	The WRATE assessment was published after the commencement of Phase Two Consultation on 24 June 2015 following a specific request for this document. Phase Two Consultation ran for 44 days and therefore exceeded the statutory requirement for consultation to last at least 28 days.	N

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Views on the consultation process								
6.12.6	Suggestions for improving the consultation process include: a) follow NLWP's consultation practice;	-	-	-	1	10052	Consultation on the Project has been undertaken in accordance with the Planning Act 2008 (as amended) which sets specific requirements for consultation on all Nationally Significant Infrastructure Projects. Consultation practice on the NLWP, which is a statutory plan which is prepared in accordance with the provisions of the Town & Country Planning Act 1990, which is different and not applicable to the requirements for a DCO which is completed in accordance with the Planning Act 2008 (as amended).	N
	b) re-circulate an in-depth report outlining all comments received during the consultation process.						The Phase One Consultation Feedback Report was published during Phase Two Consultation on NLWA's corporate website and the Project website, as well as being available at exhibitions. The information contained in the Feedback Report is also contained in this report.	N
6.12.7	The following documents were suggested to be considered in the preparation of the Application: a) Principle of development - London Plan; b) Waste - London Plan; the Municipal and Business	GLA	-	-	0	-	The Applicant has considered all of these documents as part of the Application. The Planning Statement sets out the long list of national, regional and local policy considered.	N

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Views on the consultation process								
	Waste Management Strategies; c) Energy - London Plan; Climate Change Mitigation Energy Strategy; d) Air quality - London Plan; the Mayor's Air Quality Strategy; e) Ambient noise - London Plan; the Mayor's Ambient Noise Strategy; f) Transport - London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG g) Crossrail - London Plan; Mayoral Community Infrastructure Levy; h) The National Planning Policy for Waste (October 2014); i) The Upper Lee Valley Opportunity Area Planning Framework, July 2013; j) The Edmonton Eco Park Planning Brief, Supplementary Planning Document, May 2013; and k) Central Leaside Area Action Plan (submission version-consultation period, 5 January - 16 February 2015).							

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

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Views on the consultation process								
							allowing for users to notify the Applicant of any access problems.	
6.12.10	Suggestions to improve the consultation process: a) provide a 3D mockup model of the facility;	-	-	-	1	79	The development of a 3D model for use at consultation events was considered, but this was considered to be too costly. Therefore, the video shown as part of Phase Two Consultation includes a 3D model of the proposed facility, which helped participants to visualise proposals.	N
	b) use graphs rather than bullet points						The aim was to make the information presented at consultation as accessible as possible. For this reason, information was provided in bullet point form to enable interpretation. The documents submitted with the DCO application include graphs, where relevant.	N
Information								
6.12.11	Satisfied with the level of detail and quality of information	-	WCC	LVRPA	12	5; 68; 77; 80; 86; 87; 92; 94; 99; 10046; 10088; 10089	Noted and welcomed.	N
6.12.12	Challenge because the provided information was: a) technical, extensive and difficult to understand;	-	-	-	7	74; 78; 79; 88; 89; 10052; 10120	Whilst the information presented was based on the findings of technical reports, the website, exhibition boards and consultation booklet provided a simplified version in order to make it as accessible as possible. Links to/copies of the full versions of technical documents were also provided. Three videos were also	N

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Views on the consultation process								
							produced to provide an easy to understand overview of the Project.	
	b) difficult to find;						Information was available in a range of formats including hard copies at the exhibitions and online.	N
	c) biased and not balanced;						The assessments presented during Phase Two Consultation have been undertaken in accordance with all applicable guidance and regulations. They present an accurate recording of the effects of the Project and are reported in an unbiased way.	N
	d) did not answer questions raised during Phase 1;						Significant additional information was provided during Phase Two Consultation in response to requests made during Phase One Consultation. The information provided is described in Section 5. All comments were reviewed and reported in the Phase One Consultation Feedback Report which was made available prior to Phase Two Consultation.	N
	e) the carbon report, should have been provided earlier to give consultees enough time to analyse it.						The WRATE assessment was published after the commencement of Phase Two Consultation in response to a specific request for this document. It is not a requirement to publish all information to be submitted with the Application as part of pre-application consultation, nevertheless the Applicant published a broad range of information including the Interim	N

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Views on the consultation process								
							Sustainability Statement which references the findings of the WRATE assessment.	
6.12.13	Suggestions: a) keep people living in the local area informed;	PHE	-	-	4	10088; 66; 89; 10042	The Applicant intends to maintain engagement on the Project in the future. During Construction the Code of Construction Practice states that the Applicant will establish a dedicated website, established a Community Liaison Group and provide a dedicated e-mail address and telephone line for enquiries. In the longer term EcoPark House presents an opportunity for continued community engagement.	N
	b) provide more detailed information;						The level of detail provided is commensurate with a project of this scale and nature at this stage in the process. The Draft DCO requires further details to be approved by LB Enfield at relevant stages.	N
	c) engage the local community by doing more work in schools, public areas;						EcoPark House presents an opportunity for further engagement with the community and schools in the future. More detailed arrangements for the use and management of EcoPark House will be developed prior to its opening.	N
	d) do not call the proposed facility EcoPark as it is not in line with its function						Edmonton EcoPark is the existing name and it is not proposed to change it.	N

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

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

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

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Views on the consultation process								
							informed of application process and provided with opportunities to present their case on proposals. The Code of Construction Practice also states that the Applicant will take reasonable steps to engage with the community during construction.	
	b) has NLWA been fully transparent throughout the consultation process.						The Applicant has been transparent throughout the consultation process. Phase One and Two Consultations have been held in accordance with the published SoCC, regulations and guidelines set out pursuant to the Planning Act 2008 (as amended). Feedback from both Phases has been carefully considered, reported in the Phase One Consultation Feedback Report and in this report, and informed the development of the Project.	N
Will provide comments at a later stage								
6.12.20	Some respondents stated that they wished to reserve their right to provide further comments when finalised reports are published or if more information becomes available.	GLA; NE; PHE	LBE	-	0	-	Noted. As part of the statutory process anyone is able to register as an interested party with the Planning Inspectorate once the application has been accepted. Through this they will be kept informed of application process and provided with opportunities to present their case on proposals.	N

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Views on the consultation process								
Resubmitted questions/points from Phase One Consultation								
6.12.21	One respondent resubmitted their response to Phase One Consultation.	-	-	-	1	10052	All responses received during Phase One Consultation were carefully considered and analysed as set out in the Phase One Consultation Feedback Report. All comments are set out in the tables in Section 4.	N
6.12.22	<p>Strategy:</p> <p>a) NLWA should develop a comprehensive future waste resource strategy that includes financially and risk assessed what-if scenarios, including a reducing waste future;</p>	-	-	-	1	10052	<p>This response was expressly submitted as a Phase Two response the answers remain the same as those provided in the Phase One response tables which have been copied below for convenience. Where there are updates to the answer in line with subsequent updates to the Project these are noted in bold. Many of the comments are similar to those received in Phase Two Consultation responses, and the Tables in Section 6 are therefore also relevant.</p> <p>The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50 per cent recycling rate for household waste. The methodology was clearly set out in the Need Assessment document, published at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In considering the forecasts various scenarios were considered.</p>	N

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Views on the consultation process								
							No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically-available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection which uses population growth as the basis. (Paragraph 4.5.20)	
	b) NLWA should develop and assess smaller capacity ERF plant options, which could be expanded over time;						Based on our assessment the ERF is the optimum size taking into account the forecast waste arisings and NLWA's obligation to put in place arrangements to deal with residual waste collected in its area without being able to be certain about how much there would be. It is not anticipated that significant additional capacity would be required during the lifetime of the ERF,	N

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							however should this be the case a new application would be required. (Paragraph 4.5.30).	
	c) What strategy underpins the business case for the proposed ERF plant, given that NLJWS expires in 2020 and its focus is purely on municipal waste?						<p>The scheme proposed is consistent with the Joint Waste Strategy of the NLWA and seven north London Boroughs. In developing these proposals, NLWA has been working with the seven boroughs as its partners. The scheme is being brought forward to replace the existing EfW facility and ensure continued sustainable treatment of north London's residual waste. (Paragraph 4.5.23).</p> <p>The strategic issues raised in the NLJWS have been considered in the Application documents specifically the Planning Statement, the Need Assessment and the Alternatives Assessment Report.</p>	
	d) Why do the proposals focus strategically on one of the very lowest ranking elements of the Waste Hierarchy?						NLWA is committed to the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting, and has active programmes to encourage waste prevention, re-use and recycling. The NLWA's 'Wise up to Waste' campaign has more details of this activity (See: http://www.wiseuptowaste.org.uk/).	N

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Views on the consultation process								
							The need case is based on the central recycling scenario of 50 per cent, which is considered to be an appropriate target for modelling purposes, and consistent with existing strategy. The forecasting methodology gives a lower estimate of residual waste arisings over the period than if we had used population growth (which is the basis of the GLA estimates). (Paragraph 4.5.19)	
	e) Given that the proposals state that in total fewer waste processes would take place at Edmonton EcoPark compared to today, does this mean that some of the processes would be outsourced to an alternate location and how would this conform with the aspirations for co-location of facilities to reduce land take?						Waste treatment operations which would be discontinued to make way for the new development would be sought from third party suppliers. These may be reinstated on site in the long term, subject to planning and permitting, but as yet no decisions have been made to do so. (Paragraph 4.5.23)	N
	f) How have the proposals been formally assessed and agreed by the other seven Partner Authorities within the context of the approved NLJWS?						The scheme proposed is consistent with the Joint Waste Strategy of the NLWA and seven north London Boroughs. In developing these proposals, NLWA has been working with the seven boroughs as its partners. The applicant has consulted with partner authorities, including the seven NLWA boroughs, on the use of recycling target assumptions in the modelling. (Paragraph 4.5.23).	N
	g) Will the NLJWS Implementation Objectives be reviewed following the decision not to follow the SRF Procurement route							N

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Views on the consultation process								
							It is not proposed to update the NLJWS formally at this stage as it is no longer a statutory requirement but the strategic issues raised have been considered in the Application documents specifically the Planning Statement, the Need Assessment and the Alternatives Assessment Report.	
6.12.23	Waste forecasting: a) Why has a low recycling scenario been assumed; given that in 2051 the plant would be processing 65% of anticipated waste at that time, this implies a recycling level of only 35%; this implied recycling level would be even lower in preceding years when the absolute waste levels are expected to be smaller but the full ERF capacity is employed;	-	-	-	1	10052	The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which was available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In developing the forecasts various scenarios were considered.	N
	b) Why have low forecast recycling levels for C&I waste been assumed? These are very low compared with national C&I targets and when compared directly with HHLD recycling levels?						The forecasting methodology gives a lower estimate of residual waste arisings over the period than if we had used population growth (which is the basis of the GLA estimates). (Paragraph 4.5.19). The modelling assumptions regarding the forecast growth in	N

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	c) Why has zero recycling level for Other Waste been assumed given?						<p>residual C&I waste market share has been agreed with each Constituent borough as representing a reasonable assumption in light of each borough's plans in this area.</p> <p>Other waste includes fly-tipped waste, Construction and Demolition (C&D) waste, ground clearing waste, highways waste, and asbestos waste. Given the uncertainty regarding changes in 'other' waste streams in the future, and the relatively low proportion of the overall waste arisings represented, for forecasting purposes it has been assumed that these 'other' waste arisings will remain static at 2012/13 levels for the duration of the modelling period (i.e. out to 2050/51).</p>	N
	d) Why is there no assessment of plant implications of the single waste forecast versus the alternate Central and High Recycling scenarios?						The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In	N
	e) Why is there no assessment of the effect of lower (or higher) waste levels versus the Low Recycling scenario and by extension versus the Central or High Recycling scenarios?							N

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Views on the consultation process								
							<p>considering the forecasts various scenarios were considered.</p> <p>No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically-available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection which uses population growth as the basis. (Paragraph 4.5.21).</p>	
	f) Is there integration between the ERF proposal and the North London Waste Plan (NLWP2)?						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	N

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Views on the consultation process								
	g) Have the implications of the ERF proposal on the NLWP (2) been assessed?						<p>authorities. It is understood, through liaison with the North London Waste Plan (NLWP) process, in which the NLWA is a key stakeholder that the NLWP data studies will take into account the forecasting carried out for this Project. (Paragraph 4.5.22).</p> <p>The North London Waste Plan was subsequently published for consultation in July 2015. The consultation draft safeguards the Edmonton EcoPark as an existing waste management site and acknowledges this Application.</p>	N
	h) Given that NLWA is planning to move beyond its Apportionment target, where would the additional volume of waste come from?						<p>The facility has been sized to meet the forecast need taking into account the apportionment targets, please refer to the Need Assessment submitted as part of the DCO application for more information.</p> <p>Should the amount of residual waste collected by the NLWA boroughs be less than assumed in the ERF sizing then the ERF would have spare capacity. If this were to be the case then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public authorities as currently done at the existing facility.</p> <p>To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by the NLWA</p>	

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Views on the consultation process								
							boroughs in the future would not be in the interests of the local community due to the risk that this waste would have to be treated or diverted to landfill outside the area in contravention of the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026. (Paragraph 4.5.20)	
6.12.24	<p>Overprovision:</p> <p>a) Provide information on why when comparing recent waste forecasts from North London's waste bodies there is a difference of circa 100,000 tonnes pa;</p>	-	-	-	1	10052	No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically-available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection which uses population growth as the basis. (Paragraph 4.5.21)	N

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	b) Why has it been assumed that NLWA's share of business waste would increase and how is NLWA planning to achieve this? Why is there no further improvement expected post 2025?						<p>The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, and based on a range of data and compiled by nationally recognised external advisers. In considering the forecasts various scenarios were considered.</p> <p>No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection</p>	N
	c) Why has it been assumed that WCA's are going to collect increased volumes of C&I waste and that NLWA would double its share of such waste?							N

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							which uses population growth as the basis. (Paragraph 4.5.21)	
	d) Recent data from the eight Partner Authorities plus the GLA / London Plan combine to indicate a possible 50% difference between highest and lowest forecasts in 2051; why is there no assessment of the different forecasts?						<p>A WRATE (an Environment Agency tool for environmental assessment) assessment which includes covers carbon comparative analysis is currently being undertaken and will be available at Phase Two Consultation.</p> <p>Further cost information will be available at Phase Two Consultation but will remain subject to detailed design after the Development Consent Order (DCO) application has been determined.</p> <p>Decisions are made by NLWA which is made up of 14 councillors, two from each of the seven constituent boroughs.</p> <p>In developing this scheme, NLWA has been working with the seven boroughs as its partners. (Paragraph 4.5.23)</p>	N
	e) Is it sensible to use GDHI metric to determine households' waste outputs given it is unclear how current macro geopolitical factors would play out?						The waste forecasting is based on estimates of residual waste which will be collected by the north London boroughs over the years to 2051, allowing for a 50 per cent recycling rate for household waste. The methodology is clearly set out in the Need Assessment document, which will be available at Phase Two Consultation, and based on a range of data and compiled by nationally recognised external advisers. In	N

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							<p>considering the forecasts various scenarios were considered.</p> <p>No waste forecasting approach is without this uncertainty but for the scheme the forecasting has been based on comprehensive regression analysis to identify the social/economic indicator variables most closely correlated with historic household waste arisings using the most up-to-date publically available data. A comparison with a number of alternative approaches to modelling future waste arisings including, for example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan shows that the scheme forecast is broadly consistent with these alternatives and generates a more conservative estimate of overall household waste arisings compared to the main London Plan projection which uses population growth as the basis. (Paragraph 4.5.21)</p>	
	f) Would feedstock be imported and what are the implications for this?						The ERF would be fed with residual waste collected by the NLWA authorities from household, C&I and other sources (e.g. fly-tipping, highways etc.). Should there be spare capacity, then other waste could be taken in, to ensure that the ERF is managed efficiently, and could include waste from other public	N
	g) Would high relative calorific value (CV) feedstock be available given that EU wide recycling strategy is looking to remove higher CV items							N

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Views on the consultation process								
	such as paper, card, textiles from the waste streams? Would this lead to recyclate being utilised to make up for shortfalls in residual waste?						authorities as currently done at the existing facility. This waste would only be secured by offering competitive gate fees and would generate an income for the NLWA. (Paragraph 4.5.27).	
	h) What implications would overprovision have for the total waste allocated land requirement being considered under the NLWP(2)?						The ERF would be located within the Edmonton EcoPark on a part of the site currently used for other waste treatment facilities. The whole Edmonton EcoPark site is designated for waste use. Once the ERF is commissioned and operational, other waste management uses would be considered for the area on which the existing plant now stands, which would then be vacant, taking account of waste management needs at that time but subject to separate planning process if pursued in future.. (Paragraph 4.5.25)	N
6.12.25	Other: a) Provide a full lifetime comparison of water borne costs versus alternates to determine the appropriate transport option(s)	-	-	-	1	10052	The use of the River Lee Navigation for transporting waste/materials has been fully explored. However, the overall cost of doing this out-weighs the benefits and as such, this would not form part of the transport strategy for the site. The findings of the water transport study will be included in the Transport Assessment to be submitted with the DCO application. (Paragraph 4.8.5).	N

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

Account taken of Phase Two Consultation process comments

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