6.4 Environment

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
Environment								
	d) seek advice if a statutory Environmental Impact Assessment is required;						An EIA is required and an ES is submitted with the Application.	N
	e) cost should not be the main factor when identifying mitigation measures;						Mitigation measures have been identified through the environmental assessment process and incorporated into the Project design.	N
	f) plan for the new mitigation challenges posed by the opening of the Lee Park Way and the resulting increased activity;						Lee Park Way is proposed to be used to provide staff and public access to parts of the Edmonton EcoPark as part of the Project and is therefore assessed in the ES. Appropriate mitigation is built into the Project design. There would also be a barrier just past the new Edmonton EcoPark access to preclude through traffic.	N
	g) air quality should be your first, ecology second, noise third and socio-economic impact fourth priority.						Air quality, ecology, noise and socio-economic impacts are all assessed in Vol 2 of the ES.	N
Scope of assessment								
6.4.26	Support the scope of assessment; the proposed mitigation measures are comprehensive.	NE; EA; PHE; TfL; GLA	LBE	-	20	5; 79; 87; 10042;10045; 10046; 10047; 10056; 10078; 10081; 10082; 10087; 10090;	Noted	N

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

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

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

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

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

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

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

Account taken of Phase Two environment comments

6.4.33 Environment comments received during Phase Two Consultation covered air quality, noise, ecology, socio-economic impacts, visual impact, and water resources; for each topic a range of mitigation measures were suggested.

6.4.34 Some respondents noted the importance of ensuring that air quality is not affected by the Project, with others citing concern about odour from the existing facilities on-site. The impact of the Project on air quality is assessed in Vol 2 Section 2 of the ES (AD06.02) which concludes there would be no significant impact.

6.4.35 Other comments related to ecology and the need to ensure that the Project does not result in the loss of habitat. Ecology measures have been incorporated into the design, for example marginal planting is proposed along Enfield Ditch and there would be tree and scrub planting along the eastern boundary of the Edmonton EcoPark. The lighting design has also been informed by the ecological surveys.

6.4.36 Some respondents cited concern about noise resulting from the Project. During construction the CoCP incorporates measures to manage noise, and during operation noise would be controlled through the Environmental Permit.

6.4.37 Several comments noted that the visual impact of the Project should be reduced as far as possible, and that the removal of the Camden Plant Ltd. may increase the Project's visibility. The Project has been designed to reduce the visual impact from sensitive receptors, such as the Lee Valley Regional Park, for example by stepping back the massing of the ERF and landscaping along the eastern boundary of the Edmonton EcoPark. The ES has assumed that Camden Plant Ltd. is removed since it does not have planning permission, and this assumption means that the worst case scenario is assessed.

6.4.38 Comments noted that there is potential for the Project to impact on waste resources and flood risk. Many of the mitigation measures suggested have been incorporated into the design, for example the use of SuDs, rainwater harvesting and flood attenuation tanks.

6.4.39 Many comment support the scope of the environmental assessment and the mitigation measures proposed. Some of the suggestions for further assessments had already been undertaken and were set out in the PEIR, for example noise, air quality and cumulative assessment.

6.4.40 Some comments requested more information on the options considered, and in particular the carbon emissions. The WRATE and Carbon Intensity Floor Modelling Technical Report which considered carbon emission was therefore published during Phase Two Consultation. The Alternatives Assessment also includes information on the options considered.