

## 6.7 Need

6.7.1 The comments raised in respect of Need issues during Phase Two Consultation are summarised in Table 6.6, together with the Applicant's response.

Table 6.6: Comments on Need received in Phase Two Consultation

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
Reasons for supporting the proposed facility								
6.7.2	The need for the project is supported.	GLA	WCC; HBC	LWL	46	5; 59; 60; 62; 66; 70; 72; 75; 76; 79; 80; 82; 87; 92; 94; 95; 97; 10116; 10118; 10112; 10114; 10115; 10109; 10110; 10111; 10102; 10103; 10105; 10095; 10097; 10101; 10094; 10087; 10088; 10084; 10085; 10086; 10078; 10096; 10098; 10091; 10092; 10093; 10090; 10045; 10047	Support for the scheme is noted and welcomed.	-
6.7.3	Encourages recycling by generating public interest and providing additional recycling capacity.	GLA	-	-	2	10085; 68		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
6.7.4	It is environmentally friendly; contributes to UK's renewable and low carbon energy targets; reduces air pollution.	GLA	LBE	-	12	68; 72; 77; 78; 99; 10046; 10081; 10088; 10089; 10109; 10110; 10114		
6.7.5	Has the potential to benefit the local community by creating new and securing existing job opportunities; regenerating the area and reducing energy bills.	-	-	LWL	20	68; 78; 83; 99; 10083; 10084; 10087; 10095; 10096; 10099; 10100; 10102; 10103; 10104; 10106; 10107; 10108; 10111; 10117; 10119	We agree that the Project will make a positive contribution to regenerating the area and create employment opportunities, both in the construction phase and operations phase. Whilst it is beyond the scope of the Project and out of the Applicant's control to reduce energy bills for consumers, the Project will make a positive contribution to national energy security (refer to Section 2.1 of the Need Assessment (AD05.04) for details).	-
6.7.6	The existing facility is reaching the end of its life-span.	-	WCC	LWL	0	-	Support for the scheme is noted and welcomed.	-
6.7.7	Offers financial benefits: a) it is cheaper than sending waste to landfill; provides cheap energy; b) the plant would operate in CHP mode with both electrical and heat offtake, which is dependent on the energy technology market and user demand. This allows for seasonal consumption of heat / flexibility to be	GLA	-	LWL	2	10075; 10112		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	built into the proposal, thereby ensuring that optimum efficiencies and cost effectiveness is secured; c) represents a good value for the residents of North London.							
6.7.8	The project is in line with other plans/policies such as Lee Valley Heat Network (LVHN), London Plan, North London Waste Plan (NLWP); Lee Valley OAPF.	GLA	LBC; LBE; NLWP	-	1	10047	The Lee Valley Heat Network (LVHN) is not part of this Project, however the ERF will be Combined Heat and Power (CHP) enabled and routes for a heat networks are safeguarded, these would allow the LVHN.	-
6.7.9	Less waste is sent to landfill.	GLA	LBE; LBWF	LWL	10	80; 87; 10046; 10081; 10082; 10088; 10095; 10115; 10117; 10118	Support for the scheme is noted and welcomed.	-
6.7.10	Location is suitable as it: a) makes use of the existing site; b) encourages co-location of facilities; c) is large enough.	GLA	LBC; NLWP	LWL	0	-		
6.7.11	Meets future demand for (low carbon) energy while providing a solution for growing waste volume.	GLA	LBE	-	3	10099; 68; 97		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
6.7.12	The new technology will improve both the look and efficiency of the facility.	GLA	LBE; WCC	LWL	21	68; 10046; 10047; 10056; 10078; 10081; 10082; 10083; 10084; 10087; 10088; 10089; 10095; 10097; 10098; 10100; 10101; 10105; 10106; 10108; 10113		
6.7.13	Promotes net self-sufficiency.	GLA	LBE	-	0	-		
6.7.14	Promotes localism: waste is treated locally; provides opportunities for decentralised heat and energy networks.	GLA	LBC; NLWP		2	10112; 62		
6.7.15	Produces energy.	-	LBWF	-	8	79; 10045; 10080; 10099; 10104; 10107; 10114; 10115		
6.7.16	Other reasons for support: provides educational opportunities for school children.	-	-	-	1	10084		

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
6.7.17	Support with a caveat - the facility should: a) not be visually obtrusive;	GLA	LBE	-	8	5; 61; 69; 83; 92; 95; 10060; 10093 (Multiple submissions 92; 10060 (Member of the public))	Support for the scheme is noted and welcomed with the following points of response: Due to the size and scale of the ERF there will be some visual impact, and this has been assessed in the Vol 3 of the ES. The design has sought to reduce the bulk and massing of the ERF thereby reducing the visual impact.	N
	b) heat being used efficiently including during the summer months when there is less demand for heat;						The proposed ERF is expected to be one of the most efficient facilities in the UK. The proposed ERF will be designed to have an R1 energy efficiency of approximately 0.8 and will therefore be classed as a recovery operation under the Waste Framework Directive. The efficiency will be dependent on the level and nature of the heat demand (outside the control of the Applicant). The type and design of turbine to be installed in the proposed ERF would be supplied in an efficient and cost effective manner to be decided upon during detailed design.	N
	c) waste being stored on site so it can be used efficiently when required;						The Project includes a bunker with sufficient capacity to ensure a continuous supply of fuel.	N
	d) not impact on waste reduction and recycling targets;						Please refer to response 6.7.21 regarding the impact on waste reduction and recycling targets.	N
	e) demonstrate that the waste is truly residual;						The ERF will treat residual waste collected by the NLWA Constituent Boroughs. Should the facility at any point have spare capacity (for example where lower than forecast residual	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							waste arisings occur and/or higher recycling rates are achieved) then residual waste from other sources within and outside NLWA area can be treated without acting as a barrier to NLWA and its Constituent Boroughs maximising recycling rates.	
	f) be consistent with adopted planning policy						The Project is generally in conformance with planning policy, further detail is set out in the Planning Statement (AD05.02). It should be noted that the governing policy framework for this type of NSIP is NPS EN-1 and EN-3.	N
<b>Objections to the proposed facility</b>								
6.7.18	Object to the proposals because: the project is unnecessary; challenge the scope and scale of the draft DCO.	-	-	-	3	59; 90; 89;	NPS EN-1 and EN-3 demonstrate an urgent need for energy infrastructure of this type (refer to the Need Assessment for details). In respect of waste management the Need Assessment sets out the need for the Project in terms of meeting policy, and how the scope and scale of the Project meets the requirements for the Applicant to treat/dispose of residual waste collected by the Constituent Boroughs based on the forecasting of future residual waste arisings.	N
6.7.19	The proposed location is unsuitable because: a) it is too close to residents	-	-	-	4	59; 85; 10076; 10120	The ERF would be located at the EcoPark which is an existing waste site. The EcoPark is safeguarded for future waste use in the London Plan. The nearest residential properties are 600m to the east and west of the operational site. The likely significant effects at sensitive receptors, such as residential areas, are considered in the ES.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	b) is not large enough						The Book of Plans (AD02.01) and the Design and Access Statement demonstrate that the Edmonton EcoPark is large enough to accommodate the proposed facility.	N
	c) places all of the burden on Enfield residents						The assessment of alternatives conducted as part of the North London Waste Plan development did not identify any other suitable sites within NLWA area.	N
6.7.20	Concern about financial implications to the tax payer resulting from inaccurate waste forecasting model and not updated North London Waste Plan; the money could be used for other essential services	-	-	-	2	86; 10052	<p>The waste forecasting is based on estimates of residual waste which will be collected by the Constituent Boroughs over the years to 2051, and includes a range of recycling rate scenarios (40%, 50% and 60%) which represent a reasonable range of estimated future household recycling performance for NLWA area. The methodology for waste forecasting is clearly set out in the Need Assessment (AD05.04).</p> <p>To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by the Constituent Boroughs in the future would not be in the interests of tax payers due to the risk that this waste would have to be treated or diverted to landfill outside the area not meeting the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.</p> <p>No waste forecasting approach is without a level of uncertainty but for the Project 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</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							<p>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 within the range identified in the London Plan and within that is at the lower end of overall household waste arisings compared to the main London Plan projection.</p> <p>The draft North London Waste Plan, recently issued for consultation takes into account the forecasting carried out for this Project.</p> <p>The Project is being brought forward to deliver NLWA statutory responsibilities as a Waste Disposal Authority. The funding for this Project is as such not provided at the expense of other essential services.</p>	
6.7.21	The facility poses environmental and health hazards and impacts adversely on residents' quality of life.	-	-	-	2	90; 10120	The impact of the Project on the environment is considered in the ES and the Health Impact Assessment considers the potential health impacts. Refer to the Environment Table for further information 6.4.	N
6.7.22	The facility would require large volumes of waste which would have negative impact on improving recycling/prevention targets	-	-	-	6	77; 86; 88; 89; 10052; 10056	The Applicant is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. NLWA has active programmes to encourage waste prevention, re-use and recycling. Further details of this proactive approach to waste prevention and increasing the levels of recycling and composting can be found in the Need Assessment. In addition, NLWA's 'Wise up to Waste' campaign has	N



Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							further information (See: <a href="http://www.wiseuptowaste.org.uk/">http://www.wiseuptowaste.org.uk/</a> ). The ERF will treat residual waste collected by NLWA Constituent Boroughs. Should the facility at any point have spare capacity (for example where lower than forecast residual waste arisings occur and/or higher recycling rates are achieved) then residual waste from other sources within and outside NLWA area can be treated without acting as a barrier to NLWA and its Constituent Boroughs maximising recycling rates.	
6.7.23	<p>Insufficient assessment, lack of strategy: no cost/benefit/risk analysis of alternate capacity sizes, stepped approach to building capacity or looking into various waste scenarios, e.g.:</p> <ul style="list-style-type: none"> <li>a) waste in manufacturing changes;</li> <li>b) collaborative economy grows;</li> <li>c) focus on circular economy increases;</li> <li>d) technological, legal or regulatory changes occur.</li> </ul> <p>Other alternatives, including a possible exit route if the proposed development is</p>	-	-	-	4	59; 88; 89; 10052	<p>A summary of the assessment of alternative treatment options can be found in the Alternative Assessment Report (AD05.03). The assessment of the cost of delivery of the Project confirmed that a single ERF producing energy was more cost effective than other potential treatment options.</p> <p>The factors affecting household MSW generation are numerous and complex largely driven by social factors which do not necessarily display a mathematical correlation.</p> <p>The waste forecasting carried out for this Project 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.</p> <p>A comparison with a number of alternative approaches to modelling future waste arisings in London shows that the Applicant's waste model is consistent with the alternatives (for</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	deemed inappropriate, have not been explored						<p>example, those based on waste per household using various household growth scenarios examined for the development of the updated London Plan).</p> <p>In comparison to the modelled scenarios developed as part of the updated London Plan the Applicant's model generates an estimate of overall household waste arisings which is at the lower end of the range in the London Plan which uses population growth as the basis.</p> <p>No approach to the forecasting of future waste arisings is immune to the inherent uncertainty involved in estimating waste arisings more than a few years into the future; to predict how the various factors identified in this consultation comment (e.g. the impact of a growth in the collaborative economy or future changes in technology, legal or regulatory change etc.) would impact on future waste arisings would be highly speculative and difficult to justify in any meaningful way.</p> <p>The approach taken to waste forecasting for the Project, based as it is on statistical analysis of historical waste arisings and the future impact of a range of recycling rate scenarios, is considered to be a reasonable basis on which to assess residual waste treatment capacity requirements.</p> <p>See response 6.7.23 update regarding the consideration of other alternative treatment options.</p> <p>If a DCO for the Project were not granted the Applicant would have to go to the market at</p>	

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							least initially in the short term and review its options at that time.	
6.7.24	The proposed development does not comply with other strategies/policies such as:	-	-	-	1	59	The Project complies with National Planning Policy for Waste, further information is provided in the Planning Statement. Section 4 requires waste planning authorities to allocate suitable waste sites and as such is not applicable to development applications. Nevertheless the Edmonton EcoPark is identified as a waste site in local policy.	N
	a) National Planning Policy for Waste 2014 (with specific reference to S.4);							
	b) R1 status promoted by the European Commission;						The proposed ERF will be designed to have an R1 energy efficiency of approximately 0.8 and will therefore be classed as a recovery operation under the Waste Framework Directive.	N
	c) Section 110 of Localism Act 2011;						Section 110 of the Localism Act refers to the Duty to Cooperate and is not applicable to persons seeking consent for individual developments.	N
d) CHP element of sections 93-97 of National Planning Policy Framework 2012.	Sections 93-97 of the NPPF relate to meeting the challenge of climate change. The Project is in general conformity with these sections since it helps increase the use of renewable and low carbon energy – for further details please see Section 2.2. Climate Change in the Need Assessment.	N						
6.7.25	a) Concerns that the proposed facility is too big and its size is based on inaccurate waste forecasting model (over relying on GDHI metric; assuming higher	EA	-	-	3	86; 89; 10052	Please refer to response 1.2.6. In addition: The use of the GDHI metric is based on detailed statistical regression analysis of the correlations between historic waste arisings and a range of socio-economic variables. The approach is	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	Apportionment target and C&I share) and data that does not take into account future waste reducing technologies, new regulations or changes in the demand for non-renewable energy.						described in detail in Appendix A of the Need Assessment. The London Plan commits the Mayor to a policy whereby London's net self-sufficiency in treating its own waste within London is improved through reducing the proportion of waste exported from the capital over time (and down to zero exports by 2026). The Project will make a significant contribution to achieving this aim, including by meeting the net self-sufficiency target for the Constituent Boroughs. The modelling assumptions regarding the forecast growth in 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.	
	b) Concern that planning for overcapacity would lead to import of waste which in turn would result in long journeys to and from the facility.						The Applicant is not 'planning for overcapacity'; in addition to the waste modelling work, the proposed sizing is informed by a number of important influencing factors including the financial risk to the Applicant of having under-capacity, as well as operational design considerations relating to the seasonality of waste arisings, bunker management and thermal capacity. These factors result in variations in waste arisings throughout the year and as such the facility will be required to manage these fluctuations.	N
	c) There is a suggestion that the Joint North London Waste Strategy should have been updated and used to						The North London Joint Waste Strategy covers the period from 2004 to 2020 and as such is still current.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	inform the waste forecasting targets.							
	d) Similarly, another request is the waste forecasting model to be rerun using the most up-to-date data as published in FALP March 2015.						The Need Assessment contains a comparison with an alternative approach to modelling future waste arisings as forecast within the London Plan. This shows that the forecast produced for the Project is within the range identified in the London Plan and within that is at the lower end of overall household waste arisings compared to the main London Plan projection.	N
6.7.26	Criticism that this is just a plain incinerator, not a combined heat and power facility.	-	-	-	1	59	There is not currently an existing district heating network which the Project could connect to as such the proposed ERF will be CHP enabled and routes for a heat network pipe have been safeguarded within the Application to enable a future connection.	N
<b>Alternatives</b>								
6.7.27	There should be a stronger focus on more environmentally friendly waste management systems (recycling, prevention, reuse) and energy generating methods (solar energy).	EA	-	-	8	62; 66; 77; 79; 83; 86; 88; 10052	NLWA is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. The NLWA has active programmes to encourage waste prevention, re-use and recycling. Further details of this proactive approach to waste prevention and increasing the levels of recycling and composting can be found in the Need Assessment. In addition, NLWA's 'Wise up to Waste' campaign has further information See: <a href="http://www.wiseuptowaste.org.uk/">http://www.wiseuptowaste.org.uk/</a> . A summary of the assessment of alternative treatment options can be found in the Alternative Assessment Report which confirms	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							that a single ERF producing energy was more cost effective than other potential treatment options.	
6.7.28	Other waste management methods that should be considered include: a) MBT plant in combination with anaerobic digestion and land filling the inter residue; b) gasification plant; c) methane recovery	-	-	-	3	88; 92; 79	A summary of the assessment of alternative treatment options can be found in the Alternative Assessment Report which confirms that a single ERF producing energy was more cost effective than other potential treatment options.	N
6.7.29	Suggest the CHP facility is designed differently to enable a higher energy output, working in close co-operation with two MBT plans	-	-	-	1	59	Refer to response 6.7.28.	N
<b>Lee Valley Heat Network</b>								
6.7.30	Comments on Lee Valley Heat Network include: a) overall support with requests for the produced heat to be used locally, including at Meridian Water b) concern that there might be low demand during summer months; c) criticism that the proposed heating	GLA	LBE	-	5	59; 83; 92; 10045; 10046;	The Lee Valley Heat Network (LVHN) is being brought forward by LBE. In parallel with the preparation of this Application, 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. Please see the following website for more information on the LVHN: <a href="http://www.leevalleyheatnetwork.co.uk">www.leevalleyheatnetwork.co.uk</a>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	network is not extensive enough							
6.7.31	NLWA should continue working with GLA to enable the delivery of the heat network; heat networks require substantial levels of investment and having a 40 year plus life, the new ERF will give the heat network investors' confidence that heat will continue to be available	GLA	-	-	0	-	NLWA will continue to engage with the GLA in respect of the provision of heat from the Project via Lee Valley Heat Network or other appropriate district heating network.	N
<b>Resource Recovery Facility</b>								
6.7.32	Comments on the RRF include:	-	-	-	5	10105; 66; 85; 10101; 10042	Support for the RRF is noted and welcomed.	N
	a) support as it will be beneficial to local residents and businesses, can help keep Enfield clean;							
	b) request for the Reuse and Recycling Centre to be offered free of charge;						The RRC will be provided free of charge for residents.	N
	c) criticism that there is limited information on the RRF and appears overlooked;						Information on the RRF is set out in the Book of Plans and Design and Access Statement. The facility has been fully assessed in the ES and other application documents as relevant.	N
d) question why it should be in Edmonton.	The RRF is needed for the operation of the ERF and as such needs to be located in close proximity to that facility. If the RRF were located		N					

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							off-site there would be an additional cost and impact of transporting residual waste from the RRF to the ERF.	
<b>Timeline</b>								
6.7.33	Comments on the timeline include:	-	-	-	3	10045; 10098; 82	Support for the Project coming forward now is welcomed;	N
	a) proposal is timely;							
	b) should have been done sooner;						The Project is being brought forward now in order to ensure that the proposed ERF is in place prior to the existing EfW facility coming to the end of its life;	N
	c) concern that 10 year wait is too long and technology used in the project might become obsolete						The ERF will be built using today's best available technology. It will be one of the most effective of its kind by current standards. Applicant will revisit the preferred technology solution for the ERF however the procurement and construction lead in times for delivery of the Project mean that this will need to be carried out in the short term and so it is not anticipated that there will be a significant change in the proven technologies available in that period.	N
<b>Suggested criteria</b>								
6.7.34	The proposed facility should be efficient. Efficiencies can be achieved through: a) optimising the heat off-take capacity of the plant in terms of the economic production of heat, and be in line with good steam turbine/district heating	GLA	-	-	0	-	The proposed ERF is expected to be one of the most efficient facilities in the UK. The energy output, both heat and electricity, will be optimised. At this stage the projected heat demand is not fixed.	N



Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	practice. The offtake capacity should not be designed to meet just the demands currently being negotiated with the LVHN as the LVHN capacity will be far less than the plant potential;							
	b) having the ability to adapt its export levels to demand as the Grid requires flexibility;						The ERF would allow for this.	N
	c) allowing for the adoption of new technologies that may become available;						The ERF would be built using today's best available technology. It would be one of the most effective of its kind by current standards.	N
	d) having a sufficient power storage;						Power storage does not form part of the Project. Power produced by the Project will be exported straight to the National Grid. It is not efficient to store heat, as such, should a connection to District Heating network be made heat would be exported straight away.	N
	e) gaining extra revenue from participating in capacity market auction and Demand Side Response.						The potential for the Project to participate in capacity market auction and Demand Side Response is limited because of the need to treat waste in a timely manner.	N
6.7.35	The proposed facility should be environmentally friendly: it should meet the carbon intensity floor of 400 grams	GLA	-	-	1	79	The Project would achieve the carbon intensity floor of 400 grams of CO <sub>2</sub> eq per kWh of electricity generated subject to it being connected to a heat network. Further information is set out in the Need Assessment	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	of CO <sub>2</sub> eq per kWh of electricity generated;						and WRATE report appended to the Sustainability Statement (AD05.13).	
	it should be an example of best eco practice.						The Project would use today's best available technology. The sustainability credentials of the project are set out in the Sustainability Statement.	N
<b>Further studies are required</b>								
6.7.36	Further studies to decide what the optimum capacity is. These should include:	-	-	-	3	59; 10055; 10052	It is not appropriate to consider GDHI levels with waste in economies similar to the UK for a number of reasons. GDHI data comparable with that produced by the Office for National Statistics for the UK is not readily available for other countries. The correlation equation derived from the regression analysis carried out for the Project is unique to the data used. It would not be expected that the same statistical relationship would exist for other countries, even if the data was available.	N
	a) confirm the regression work by considering Gross Disposable Household Income (GDHI) levels with waste in similar to UK economies;							
	b) conducting situational analysis to identify future trends that might affect waste volumes;						With regard to situational analysis of future trends refer to response 1.2.6 and 1.2.8.	N
	c) mapping the sources of waste and thinking how these can be influenced						With regard to how sources of waste can be influenced please refer to response 1.3.1.	N
	d) Professional evaluation should be conducted with regards to the logistics of waste derived fuel production.						With regards to waste derived fuel production, assuming that the issue refers to the production of Refuse Derived Fuel for further treatment in an alternative facility, please refer to response 1.3.2 on alternatives assessment.	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change		
<b>Need for a replacement facility</b>										
Requests for more information										
6.7.37	Waste forecasting:	-	-	-	5	66; 88; 10052; 10066; 10120	The Applicant has a legal obligation to treat residual waste collected by its Constituent Boroughs. Projections of the amount of waste collected by these boroughs is detailed in the Need Assessment. The Applicant is not responsible for treating residual waste from other boroughs and therefore projections of the amount of this residual waste is not included within the waste forecasting undertaken for the Project.	N		
	a) how much waste would be collected from other boroughs;									
	b) where would the consolidation depots be located and how much waste would be brought from them to the site;								Borough waste collection logistics are described in Section 2 of the Fuel Management Assessment (AD05.05).	N
	c) more information on future supply of waste and what amounts would be recycled; are there quotas for amount of waste to be incinerated;								The Need Assessment sets out the forecast waste arisings, together with the assumptions made regarding future recycling rates. There are no 'quotas for the amount of waste to be incinerated'.	N
d) provide data that demonstrates that more waste would be treated closer to source;						Approximately 105,000 tonnes of waste collected by the Constituent Boroughs was sent to landfill outside NLWA area in 2012/13 <sup>19</sup> . Under the Project the majority of residual waste would be treated within the ERF representing a considerable addition to the proportion of waste being treated closer to source.	N			

<sup>19</sup> Draft NLWP Data Study Part 2

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	e) provide a fuller carbon report with a wider range of scenarios;						The WRATE Assessment appended to the Sustainability Report assesses four scenarios (all waste to landfill; continuing current operations; new ERF with CHP and sending half the waste abroad and half to landfill). These are considered to provide a reasonable range of realistic scenarios to manage waste at this volume. 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
	f) the consultation documents state 'should there be spare capacity; - is this a reflection of amended waste forecasts between Phase 1 and Phase 2;						The waste forecasts have not been amended between Phase One and Phase Two Consultation. The statement reflects that these are forecasts.	N
	g) provide information that demonstrates that ERF is of optimum size.						The size of the ERF is based on 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. Further information is set out in the Need Assessment.	N
6.7.38	Recycling: a) how will NLWA achieve its 50% recycling target; why not aim for a 60% recycling target, b) what measures will be put in place to ensure	GLA	-	-	2	66; 10052	NLWA has active programmes to encourage waste prevention, re-use and recycling. NLWA's " <i>Wise up to Waste</i> " campaign has more details of this activity (See: <a href="http://www.wiseuptowaste.org.uk/">http://www.wiseuptowaste.org.uk/</a> ). Currently approximately 30 per cent of North London's waste is recycled and 50 per cent has therefore been set as an ambitious but achievable target	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
	that the project would not impact on recycling targets and waste treated in the facility is truly residual						<p>given the socio-demographic and housing stock profile of the Constituent Boroughs and current trajectory of recycling rates. Further discussion of what constitutes a reasonable expectation of recycling rate levels for NLWA area can be found in the Need Assessment.</p> <p>NLWA is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. The Authority has active programmes to encourage waste prevention, re-use and recycling. Further details of this proactive approach to waste prevention and increasing the levels of recycling and composting can be found in the Need Assessment.</p>	
6.7.39	Request for a list of failed waste incineration projects and the costs of those that have gone ahead to be provided	-	-	-	1	89	<p>The Applicant is not aware of any failed incineration projects.</p> <p>It is not appropriate for this application to provide costs of other projects.</p>	N
6.7.40	Why have plans for using a SRF plant been abandoned, despite statements made at the time that this was the most suitable technology to manage North London's residual waste?	-	-	-	1	10052	<p>The decision to not progress a SRF plant was taken on the basis of two key assessments. The first related to the planning policy framework affecting the Edmonton EcoPark which had altered with the cumulative effect of the SPD for the EcoPark site by LB Enfield and the Upper Lee Valley Opportunity Area Planning Framework by the Mayor of London. These policies represented a shift in attitudes towards future energy recovery on site to replace the existing EfW, such that energy recovery at the Edmonton EcoPark was supported. The second</p>	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							assessment was an updated assessment of the cost of delivery of an energy recovery facility at the Edmonton EcoPark taking into account the improvement in deliverability of that solution through the changed planning policies. This second assessment confirmed the Outline Business Case analysis that a single treatment facility producing energy was more cost effective than other potential treatment options. Further information is set out in the Alternatives Assessment.	
6.7.41	Electricity / heating networks: a) provide more information on the heating scheme;	GLA	-	-	2	66; 92	The Lee Valley Heat Network (LVHN) is being brought forward by LBE and does not form part of this application. 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. Please see the following website for more information on the LVHN: <a href="http://www.leevalleyheatnetwork.co.uk">www.leevalleyheatnetwork.co.uk</a>	N
	b) provide information on the electricity and heat capacity when describing the plant's energy output						At this stage the projected heat demand is not fixed. Energy output is therefore quoted in MW for consistency and because this is the unit used in NPS EN-1.	N
6.7.42	Alternatives: a) what alternatives have you considered and why were these rejected;	-	-	-	3	74; 86; 10052	The alternatives considered are set out in the Alternatives Assessment (AD05.03).	N
	b) request for more visionary alternatives designed by an independent party;						Based on our assessment, we considered that an ERF is the most suitable technology to manage North London's residual waste. As is standard, the Applicant is responsible for procuring a design for the Project, and in this	N

Ref	Comment	SC	LA	LI	No. CC	CC IDs	Applicant's response	Change
<b>Need for a replacement facility</b>								
							case has commissioned Grimshaw Architects to design the new facilities.	
	c) wouldn't a smaller plant suffice to deal with the estimated levels of waste;						The proposed ERF has been sized to treat the forecast waste arisings, as documented in Need Assessment.	N
	d) what cost of risk has NLWA attributed to undercapacity and what probability of occurrence has been assumed; how does this analysis compare with the cost of the chosen facility.						To fail to plan for a facility of sufficient size to deal with the estimates of residual waste collected by 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 not meeting the Mayor's plan for net self-sufficiency in the treatment of London's waste by 2026.	N
6.7.43	How have the proposals been formally assessed by the partner authorities, given that the 14 councillors who make up NLWA do not represent the seven councils when addressing NLWA's issues	-	-	-	1	10052	The seven north London boroughs have been consulted on the proposals as part of the formal Phase One and Phase Two Consultations. The 14 councillors who make up NLWA do represent the seven Constituent Boroughs.  Specific planning officer and member briefings to engage the wider constituencies within those councils have been held with the seven Constituent Boroughs. Decision on management of residual waste are a matter for the statutory waste disposal authority.	N

### Account Taken of Phase Two need comments

6.7.44 Many respondents supported the need for the Project noting that the existing EfW facility is coming to the end its operational life, the Project is cheaper than sending waste to landfill, is in-line with existing policies and plans such as the LVHN, would provide low carbon energy and promotes net self-sufficiency.

- 6.7.45 Several comments supported the Project subject to it not impacting on achieving waste reduction and recycling targets, whilst other considered that the Project would impact these. The NLWA is committed to following the waste hierarchy, in which incineration or its main alternative, landfill, come after other forms of waste management such as recycling and composting. The NLWA has active programmes to encourage waste prevention, re-use and recycling. Further details can be found in the Need Assessment (AD05.04) and in the NLWA's Wise up to Waste campaign website (<http://www.wiseuptowaste.org.uk/>).
- 6.7.46 Other comments related to the location of the Project at the Edmonton EcoPark, with some respondents noting that the site is too close to residents and places all of the burden on Enfield residents. The Edmonton EcoPark is an existing waste site and safeguarded for waste use in the London Plan. The assessment of alternatives undertaken for the North London Waste Plan did not identify any suitable alternative sites.
- 6.7.47 Several comments questioned the accuracy of the waste forecasting. The Applicant's approach to waste forecasting for the Project, based as it is on statistical analysis of historical waste arisings and the future impact of recycling rate scenarios, is considered to be a reasonable basis on which to assess residual waste treatment capacity requirements. A comparison with a number of alternative approaches to modelling future waste arisings in London shows that the Applicant's waste model is consistent with the alternatives.
- 6.7.48 Other respondents felt that the Applicant is planning for overcapacity. The Applicant is not planning for overcapacity, the size of the proposed ERF has been informed by the waste forecasting and other factors such as the financial risk to the Applicant of having under-capacity, as well as operational design considerations relating to the seasonality of waste arisings, bunker management and thermal capacity.
- 6.7.49 Some respondents noted that the Project should be flexible to adapt to new technologies which may become available. The Project would be built using today's best available technology and would be one of the most effective of its kind by current standards. Applicant will revisit the preferred technology solution for the ERF however the procurement and construction lead in times for delivery of the Project mean that this will need to be carried out in the short term and so it is not anticipated that there will be a significant change in the proven technologies available in that period.
- 6.7.50 Several comments suggested further assessments which should be undertaken, including situational analysis to identify future trends that might affect waste volumes and mapping the sources of waste. All relevant and appropriate assessments have already been undertaken and are set out in the Need Assessment.