

**The Planning Policy Team**  
**Place Shaping and Enterprise Department**  
London Borough of Enfield  
Civic Centre  
Silver Street  
Enfield EN1 3XE

29th January 2010

Dear Sir/Madam,

**The Enfield Plan, Proposed Submission Stage for the Core Strategy (December 2009)  
Representations by the North London Waste Authority (NLWA)**

**Background**

The North London Waste Authority (the Authority) is the statutory waste disposal authority for the north London area, which includes the London Borough of Enfield. In that capacity, the Authority has a need to identify and procure sites for new waste facilities within the North London area. This need is driven by legislative requirements to cease disposing of so much waste to landfill (outside of London) and to adopt more sustainable solutions to the growing volumes of waste that are anticipated to arise in North London over the coming years. If the Authority does not meet these legislative targets there will be both financial penalties and increased costs as a result that would then be borne by our levy-paying constituent borough councils and therefore by local residents too. This provides the background for the Authority's standing to comment on the proposed submission stage for the Enfield Core Strategy. The Authority has previously made representations at the Preferred Options stage, Strategic Growth areas consultation (March 2009). Authority officers have also participated in Enfield Strategic Partnership discussions.

The Proposed Submission Stage for the Core Strategy has been reviewed to consider the policy framework proposed for the Edmonton EcoPark site (owned by LondonWaste Ltd) in particular, which is identified in the Core Strategy as a Strategic Industrial Location (SIL). LondonWaste Ltd (LWL) was originally established in 1994 as a 50/50 joint venture between the NLWA and SITA UK, but in December 2009 the Authority bought SITA UK's shares in LWL, making the Authority the sole shareholder of LWL, which in turn owns the EcoPark site. The Authority employs LondonWaste to provide the waste disposal service for the municipal waste generated in seven north London boroughs, including Enfield and this includes the services of the existing energy-from-waste facility, the in-vessel composting facility, the bulky waste recycling facility, the clinical waste treatment facility, the ash recycling facility and the road transfer station at the Edmonton EcoPark site. The Authority therefore has a substantial interest in the matter.

The existing energy-from-waste plant is a key facility and it will now be used by the Authority as an interim solution for managing most of the residual waste from the seven boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest whilst contracts for the construction and operation of new facilities to serve this area are procured.

## Authority Comments regarding the Ecopark Site

### Core Policy 22 – Delivering Sustainable Waste Management

Core Policy 22 as currently drafted states that the Council will support proposals for 'a more sustainable and efficient use of the site after the current incinerator is decommissioned'. This can be interpreted as meaning that only once the current incinerator is decommissioned will consideration be given to other waste uses. The Council has separately indicated that this is not the intent of the policy and that it would consider proposals whilst the current incinerator remains operational.

The spatial strategy states 'New more sustainable waste movement and treatment processes will be supported on the site...'. Additionally, the Part G of Policy 5.17 of the emerging London Plan promotes 'protecting and facilitating the maximum use of waste sites'. The Authority believes the policy should reflect the policy objective of maximising the use of the site. Therefore, in order to ensure that Core Policy 22 is consistent with the spatial strategy and the London Plan a minor amendment is requested as detailed below.

As the Council is aware and as noted above, the Authority has recently acquired LondonWaste, who in turn own the EcoPark site, and the waste facilities on this site are now expected to continue to serve the Authority's area until successor facilities are developed on the site. A procurement process will be completed to select an operator for the waste contract for the period to 2042. At this stage the Authority cannot advise what company will be selected and, therefore, it is suggested that the policy should be revised to refer to "the site operator".

The EcoPark is considered to be central to the ongoing delivery of waste management facilities and services for North London. The Authority welcomes the opportunity to work with the Council in developing the site in the future and wishes to ensure that the policy framework is supportive of the ongoing use of the EcoPark. To ensure clarity the Authority requests the following minor amendments to the policy:

Core Policy 22            '*...Continuing to support the use of the Edmonton EcoPark as a strategic waste site and working with the North London Waste Authority and ~~London Waste~~ **the site operator** to secure a **new** more sustainable and **intensive waste management processes** ~~efficient use of the site after the current incinerator is decommissioned~~ **including the future decommissioning of the current incinerator**. This includes exploring opportunities for local energy provision to support new development at Meridian Water to the south....'*

### Enfield's Spatial Strategy

Consistent with the proposed clarification to Core Policy 22, the Authority requests that the spatial strategy is revised to confirm the position in relation to the EcoPark site.

Currently the spatial strategy (page 33) states: '*Sufficient waste management facilities will be retained and safeguarded to ensure Enfield plays its part alongside six other North London boroughs in dealing with north London's waste and developing the North London Joint Waste Plan. The Edmonton EcoPark is ideally located to continue to play a strategic role in waste management. New more sustainable waste movement and treatment processes will be supported on the site following the end of the current incinerator's lifespan*'.

The Authority requests that the final sentence is revised as follows:

*'New more sustainable waste movement and treatment processes will be supported on the site following the end of the current incinerator's lifespan **including the future decommissioning of the current incinerator**'.*

### **Core Policy 37 – Central Leaside.**

Consistent with Core Policies 22 and 14, the Authority believes Core Policy 37 should make reference to the EcoPark site to reflect its status as a Preferred Industrial Location where waste management uses will be supported.

Currently Core Policy 37 makes reference to a number of the Strategic Industrial Locations and Locally Significant Industrial Sites being retained and intensified. However, the policy does not refer to the EcoPark, which is identified at Core Policy 14 as a Preferred Industrial Location.

The Authority, therefore, requests that the policy be revised to make reference to the EcoPark site being retained and intensified, consistent with its designation as a Preferred Industrial Location and the proposals set out at Core Policy 22. This amendment would ensure that there is clarity as to the status of the Preferred Industrial Land throughout the Central Leaside area.

The following wording is suggested:

Core Policy 37 *'The majority of the Central Leaside area will retain its industrial and employment character (see Core Policy 14). The Strategic Industrial Locations of Eley, Aztec 406, Montagu (the northern part), Kenninghall and Harbert Road estates, as well as the Locally Significant Sites; the Claverings Estate and the southern part of the Montagu Industrial Areas, will be retained and intensified. **In line with Core Policy 22 waste management will be supported at the Edmonton EcoPark site. ...**'*

### **Additional Comments on Site Allocations**

#### **Justification for Core Policy 22 – Delivering Sustainable Waste Management**

The Authority notes the wording of the justification section for Core Policy 22, paragraph 7.30, that:

*'The emerging NLWP indicates that approximately 28ha of land will be needed across the seven boroughs in order to meet the apportionment (as outlined in the London Plan) and the needs of the North London Waste Authority. The NLWP will identify and rigorously assess potential sites to deliver the most sustainable combination of sites to meet this need. It is therefore appropriate to delegate the allocation of sites to this document.'*

The Authority has commented on the most recent 'Preferred Options' stage on the NLWP and it is through this process specifically that the Authority has and will comment on the allocation of waste sites, including the suitability of existing waste sites for reorientation or intensification to accommodate new or additional facilities and on any potential need for additional sites to be allocated.

## Other points

### Core Policy 28 – Managing Flood Risk Through Development

The Authority recognises the intent of Core Policy 28 to enable sites within flood zones 2 and 3a to be developed with creating flood risk elsewhere. Paragraph 5 of PPS25 – Development and Flood Risk states:

*‘ The aims of planning policy on development and flood risk are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall.’*

To ensure consistency with PPS25 the Authority suggests a minor amendment to the last sentence of the first bullet point for Core Policy 28 and a similar minor amendment to the second bullet point as follows:

- ‘ ...These schemes will be expected to comprehensively address flood risk, mitigating the impacts of the development and **where viable** reducing flood risk overall.*
- *Redevelopment and intensification of existing industrial sites within the strategic industrial locations will be encouraged, provided that **where viable** this reduces flood risk overall.’*

We trust the above comments are acceptable and will be taken into account by Enfield in the Submission draft of the Core Strategy. Should you have any queries, in respect to the above or require any clarification, please don't hesitate to contact me.

Yours faithfully,



**Andrew Lappage**  
**Head of Waste Strategy and Contracts**  
**North London Waste Authority**