

23 February 2016

**North London
Waste Authority**

Unit 1B
Berol House
25 Ashley Road
Tottenham Hale
London N17 9LJ

T 020 8489 5730

E post@nlwa.gov.uk

W nlwa.gov.uk
wiseuplowaste.org.uk

By email to: localplan@enfield.gov.uk

Strategic Planning and Design,
Regeneration & Environment Department,
Enfield Council,
FREEPOST NW5036,
EN1 3BR

Dear Local Plan Team

North London Waste Authority response to the Enfield S106 Development Plan Document (DPD)

Thank you for providing the North London Waste Authority (NLWA) with the opportunity to comment upon the above consultation.

North London Waste Authority (NLWA) is the owner of LondonWaste Ltd (LWL), which owns the Edmonton EcoPark in Enfield and operates the Energy from Waste facility and other processes there. NLWA and LWL are also in discussion with Lee Valley Heat Network Ltd to supply heat to the new network.

The North London Heat and Power Project is NLWA's proposal to build an Energy Recovery Facility (ERF) with associated buildings and works. The new ERF will replace the existing plant at the Edmonton EcoPark by around 2025 so that we can continue to manage residual waste in north London, avoid costly landfill disposal outside of the capital and continue to turn waste into energy – heat and power. The consent we are applying for is a Development Consent Order (DCO). The Edmonton EcoPark is a strategic waste site, where the residual waste from seven north London boroughs, including LB Enfield, is treated.

The Authority is proposing to enter into a section 106 Agreement with LB Enfield to cover any local impacts of the DCO for the North London Heat and Power Project, which are not expressly covered in the draft DCO. The consultation document has therefore been reviewed for any impact on the Authority's DCO application.

The change in the current draft from the Section106 SPD of 2011 is that the provision which allowed for the contribution to business and employment initiatives has moved from a "to be negotiated" for projects with a build cost in excess of £20 million, to a flat rate of "2% of total build cost, irrespective of total build cost of the scheme". However, it is

unclear how this will be interpreted in the case of large developments, potentially resulting in a disproportionately large number of apprentices compared to the total number employed for large capital projects such as the North London Heat and Power Project.

If strictly interpreted, the wording with regard to the apprentice programme, which "normally" requires one apprentice per £1 million of contract value would result in approximately 450 apprenticeships required for the North London Heat and Power Project, which would comprise a significant proportion of the work force for the construction period. Given the nature of the development and the need for specialist skills this proportion of apprenticeships is disproportionate to the overall scheme.

The Authority requests that the proposed policy is amended to include a negotiation mechanism for major infrastructure projects, particularly those with high build costs. Otherwise the policy results in a disproportionate impact on these projects.

If you have any further questions regarding this response then please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Beadle', with a horizontal line extending to the right.

David Beadle
Managing Director
North London Waste Authority