

Key	
SC: Statutory Consultee	GLA: Greater London Authority
LA: Local Authority	HBC: Hertsmere Borough Council
LO: Landowner	HSE: Health and Safety Executive
CC: Community Consultee	LBE: London Borough of Enfield
	LVRPA: Lee Valley Regional Park Authority
	LWL: London Waste Limited
	WCC: Westminster City Council

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<b>Environment</b>							
<b>1. 1 Impact on air quality</b>							
1.1.1	General concern regarding impact on air quality and concern about efficacy of monitoring measures		LBE	LVRPA	10	9, 22, 24, 27, 29, 41, 43, 45, 10028, 10031	<p>NLWA proposes to use emissions cleaning technology that would mean emissions would be reduced to well below the current regulatory requirement.</p> <p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the Development Consent Order (DCO) application. During Phase 2 the emerging findings of this assessment will be available in the <i>Preliminary Environmental Information Report (PEIR)</i>.</p> <p>Stakeholders such as the Environment</p>

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							<p>Agency and local authorities have been consulted on the scope of the assessment to ensure that it is adequate.</p> <p>Air quality monitoring is carried out by the surrounding local authorities at a number of locations around the local area to monitor air quality concentrations at relevant receptor locations. Modelling will be carried out which allows concentrations of gases such as NO to be predicted over a wider area than monitoring. This ensures any high concentrations of pollutants are included in ambient monitoring. Air quality modelling measures will be set out in the environmental impact assessment.</p>
1.1.2	<p>Concern regarding CO<sub>2</sub> and NO including the following comments;</p> <ul style="list-style-type: none"> <li>• will be high;</li> <li>• should be minimised;</li> <li>• comply with London Plan carbon targets;</li> <li>• the NO scrubber would not be efficient in removing the NO gas</li> </ul>	GLA	LBE		3	38, 42, 10028	<p>The ERF must comply with stringent emission standards set by the Environment Agency. The replacement facility would have even better emission control technology than the existing plant does now. The proposed ERF would use the best currently available technology to clean flue gas and reduce NO<sub>x</sub> emissions. The scheme would include Selective Catalytic Reduction which is the most effective available treatment available for NO<sub>x</sub>.</p>
1.1.3	Concern regarding particulates in particular the impact on those with				1	27	<p>The impact of the proposed development on air quality will be considered within the</p>

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	chronic obstructive pulmonary disease (COPD)						<p>environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase 2 the emerging findings of this assessment will be available in the <i>PEIR</i>.</p> <p>The environmental impact assessment will include consideration of fine particulate matter.</p> <p>A <i>Health Impact Assessment</i> is also being undertaken for the scheme and will form part of the DCO application.</p>
1.1.4	Concern regarding accident-related air pollution. Questioned what bulk elements will be stored on site				2	6, 10018	No dangerous volatile materials are expected to be stored in large quantities on-site.
1.1.5	Concern regarding cumulative impact when combined with North Circular Road pollution				1	24	<p>The new facility is a replacement of an existing facility. The air quality assessment will set out the effects of the project on the existing air quality conditions of the site and surrounding area (taking into consideration impacts that the North Circular has on the air quality).</p> <p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase 2 the emerging</p>

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							findings of this assessment will be available in the <i>PEIR</i> .
1.1.6	Concern regarding emissions during demolition including release of contaminants and release of dust containing asbestos/heavy metals during demolition		LBE		1	25	<p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase 2 the emerging findings of this assessment will be available in the <i>PEIR</i>.</p> <p>This will include the demolition and construction works and appropriate mitigation measures will be included in the <i>Code of Construction Practice</i> which will be available during Phase 2 Consultation.</p>
1.1.7	Concern regarding emissions during start-up and shut-down period				1	6	<p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase 2 the emerging findings of this assessment will be available in the <i>PEIR</i>. Worst case emissions will be assessed to ensure all impacts are considered, including those during start up and shut down.</p>
1.1.8	Concern regarding emissions/dust from transport vehicles including the cumulative with existing pollution				5	17, 24, 45, 46, 10006	<p>The impact of the proposed development on air quality will be considered within the environmental impact assessment which</p>

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							<p>will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase 2 the emerging findings of this assessment will be available in the <i>PEIR</i>.</p> <p>An assessment of traffic generated from the development, including vehicle exhaust emissions and dust emissions from transport will be included. Appropriate measures to control emissions/dust during construction will be included in the <i>Code of Construction Practice</i> which will be available during Phase 2 Consultation.</p>
1.1.9	Request to prioritise low emissions and aim for zero pollution				7	21, 25, 36, 37, 41, 44, 10018	The impact of the proposed development on air quality will be considered within the environmental impact assessment which will be reported in the <i>Environmental Statement</i> which forms part of the DCO application. During Phase 2 the emerging findings of this assessment will be available in the <i>PEIR</i> being undertaken for the scheme. Best available measures to reduce emissions to air will be included in the scheme design, for example, within the <i>Code of Construction Practice</i> which will be available during Phase 2 Consultation.
1.1.10	No air quality concerns. Comments that it would have minimal impact and will reduce emissions compared to existing site		WCC		3	17, 39, 10006	Noted

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1.1.11	Suggest mitigation measures including low-emission vehicles and carbon capture technology				3	21, 24, 38	<p>The majority of vehicles visiting the EcoPark are those owned and operated by the north London boroughs and as such it are outside the control of the applicant. A small number of vehicles are owned and operated by LondonWaste Limited (who operate the site on behalf of NLWA) the requirements for these vehicles would be kept under review.</p> <p>A initial review of carbon capture and storage technologies has found that such technology remains unproven for this type of operation and is current not financially viable.</p>
<b>1.2 Visual impact</b>							
1.2.1	<p>Concerns about the visual impact of the scheme including:</p> <ul style="list-style-type: none"> <li>• facility will have high visibility;</li> <li>• impact on Green Belt;</li> <li>• impact on LVRP and Navigation Corridor;</li> <li>• landscaping proposals not sufficient</li> </ul>		LBE	LVRPA	1	9	The environmental impact assessment for the scheme will include a visual assessment that uses representative viewpoints from sensitive receptors to assess the effects of the proposed development. These sensitive receptors will include both residential and recreational receptors including the LVRP and Navigation Corridor and will be agreed with stakeholders. The proposed development is being designed to take account of visual impact and landscaping.
1.2.2	Removal of the Camden Aggregates		LBE		1	26	The Camden Aggregates site is not within

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	site will increase visual impact of proposed facility						the control of the applicant. The environmental impact assessment for the scheme will include a visual assessment that uses representative viewpoints from sensitive receptors to assess the effects of the proposed development. These sensitive receptors will include both residential and recreational receptors which will take into account the potential removal of the material storage mounds currently located on the Camden Aggregates site.
<b>1.3 Impact on ecology/wildlife</b>							
1.3.1	Concern about impact on ecology/wildlife including: <ul style="list-style-type: none"> <li>• loss of vegetation and habitat in north/east of site;</li> <li>• impact on Salmons Brook, Lee Navigation Corridor, SSSI, Tottenham Marshes, Lee Park Way;</li> <li>• impact on habitat connectivity;</li> <li>• not covered sufficiently in EIA</li> </ul>		LBE	LVRPA	1	12	The impact of the proposed development on ecology will be considered within the environmental impact assessment. <i>A Habitats Regulation Assessment screening (HRA)</i> is also being undertaken and will be available during Phase 2 Consultation. The <i>HRA</i> screening will identify any potential significant effects on European designated sites. Appropriate ecological measures will be included in the scheme design, including the <i>Code of Construction Practice</i> .
1.3.2	Concern regarding impact of light pollution on ecology/wildlife		LBE	LVRPA	0		The impact of the proposed development on ecology will be considered within the environmental impact assessment. This will include consideration of light pollution on ecology/wildlife During Phase 2 the emerging findings of this

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							assessment will be available in the <i>PEIR</i> . The <i>Code of Construction Practice</i> for the scheme will include measures regarding lighting during construction.
1.3.3	<p>Suggested mitigation measures including:</p> <ul style="list-style-type: none"> <li>• increase viable habitat on/around the site and include in landscaping strategy;</li> <li>• set back main massing from eastern edge;</li> <li>• dark corridor along Lee Park Way/Navigation;</li> <li>• provision of Living Walls</li> </ul>		LBE	LVRPA	1	10010	Appropriate ecological measures will be included in the scheme design, including the <i>Code of Construction Practice</i> . These measures will be summarised in the ecology section of the <i>Environmental Statement</i> and any mitigation identified.
<b>1.4 Noise pollution</b>							
1.4.1	Concerns regarding noise pollution including traffic noise, lorry alarms, long operating hours and noise from air cooled condenser				4	6, 25, 46, 10006	The impact of the proposed development on noise will be considered within the environmental impact assessment. This will include an assessment of construction and operational road traffic noise. Target noise criteria for operational plant will be specified in the <i>Environmental Statement</i> . The <i>Code of Construction Practice</i> for the scheme will include measures regarding the management of noise during construction.
1.4.2	Request to keep construction noise as low as possible to reduce impact on residents				4	16, 22, 24, 45	The impact of the proposed development on noise will be considered within the environmental impact assessment. The <i>Code of Construction Practice</i> for the scheme will include measures regarding

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							the management of noise during construction.
<b>1.5 Water pollution/flood risk</b>							
1.5.1	<p>Concerns regarding water pollution and flood risk including:</p> <ul style="list-style-type: none"> <li>• potential contamination of water courses/reservoir/ ecosystem;</li> <li>• pollution from water-borne freight;</li> <li>• surface water drainage issues;</li> <li>• flood risk</li> </ul>	GLA Thames Water Utilities Ltd	LBE		3	6, 27, 39	The impact of the proposed development on water resources will be considered within the environmental impact assessment. The <i>Code of Construction Practice</i> for the scheme will include measures to protect surface and ground water during construction. A Flood Risk Assessment is also being undertaken for the scheme which will be appended to the <i>Environmental Statement</i> .
1.5.2	<p>Suggested mitigation measures including:</p> <ul style="list-style-type: none"> <li>• comply with London Plan surface water drainage hierarchy;</li> <li>• rainwater harvesting system;</li> <li>• liaise with EA;</li> <li>• apply for Trade Effluent Consent; s</li> <li>• seek groundwater discharge permit;</li> <li>• take account of required pipe pressure;</li> <li>• fit petrol/oil interceptors on facilities;</li> <li>• fat trap in catering areas;</li> <li>• waste oil collection and recycling into biodiesel</li> </ul>	GLA Thames Water Utilities Ltd	LBE		0		<p>The impact of the proposed development on water resources will be considered within the environmental impact, the approach for which will be agreed with the Environment Agency. This will include the identification of appropriate mitigation measures if required. The <i>Code of Construction Practice</i> for the scheme will include measures to protect surface and ground water during construction.</p> <p>All necessary consents required for the operation of new facilities, such as Trade Effluent Consent and groundwater discharge consent where required would be secured in advance.</p>

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<b>1.6 Impact on health/safety</b>							
1.6.1	Protect public from dangers posed by electrical equipment and comply with regulations	HSE			0		Safety on site would be assisted by the separation of public access areas from the operational zone. Public access to the site would be carefully managed. Electrical equipment would comply with all applicable regulations.
1.6.2	Check whether Hazardous Substances Consent is required and comply with regulations	HSE			0		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.
1.6.3	Comments regarding the health impact of emissions including concern regarding cancer generally, respiratory cancer and asthma, impact on individual with COPD, request for evidence and stricter emission controls may be required				7	22, 24, 27, 29, 38, 10003, 10006	Best available technology would be used to ensure emissions are reduced as far as practicably possible. A <i>Health Impact Assessment</i> is also being undertaken for the scheme and a draft will be available during Phase 2 Consultation.
1.6.4	Comply with all regulations and refer to HSE website	HSE			0		The project would comply with all applicable regulations.
<b>1.7 Odour</b>							
1.7.1	Concern regarding odour including: <ul style="list-style-type: none"> <li>• odour comes from current site;</li> <li>• unsure where odour originates from;</li> <li>• odour will increase in new location for Russell Road resident;</li> <li>• conduct odour assessment</li> </ul>		LBE		5	22, 23, 24, 25, 10003	The impact of the proposed development on odour will be considered within the environmental impact assessment. Odour controls would be fitted to the site and some odorous processes on the existing site would be removed. It is expected that there would be a considerable improvement in odour conditions at the site.

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1.7.2	Odour will be minimised due to removal of composting facility				1	10006	Noted
1.7.3	Suggested mitigation measure to use filters to minimise odours				1	23	Appropriate odour controls would be fitted to the plant to meet Environment Agency requirements.
<b>1.8 Impact on climate change</b>							
1.8.1	<p>Concern regarding impact on climate change and request that this is assessed. Comments include:</p> <ul style="list-style-type: none"> <li>• minimise carbon emissions conform with Enfield's Spatial Vision and Strategic Objective 2;</li> <li>• not covered in documents so far;</li> <li>• conduct full analysis of implications of proposal and alternatives;</li> <li>• minimise embodied carbon during construction</li> </ul>		LBE		3	21, 38, 10028	<p>The applicant is carrying out assessments based on the WRATE methodology, an Environment Agency tool for assessing the environmental impact of proposed developments or facilities. The assessment will consider the impacts of the proposed ERF, which will include carbon impact assessments.</p> <p>The proposal has sought to minimise carbon emissions through good design. The <i>Sustainability Statement</i> to be submitted as part of the DCO application will set out more details on this. The embodied carbon is assessed as part of the <i>BREEAM assessment</i> which will form part of the DCO application.</p>
1.8.2	Query if the scheme will reduce climate change impact and meet Carbon Intensity Floor target	GLA					The <i>Sustainability Statement</i> which will form part of the DCO application will identify a carbon intensity target for ancillary buildings on site taking into account London Plan targets and future zero carbon building regulations.
<b>1.9 General/other environmental impact</b>							
1.9.1	Request to minimise environmental			LVRPA	6	11, 16, 21, 22,	The environmental impact assessment will

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	impact and statement that impact is being underplayed					24, 28	assess the environmental effects associated with the scheme development. This will identify if there are any likely significant environmental effects and mitigation will be identified where required. Effects will be minimised through environmental design input and measures contained within the <i>Code of Construction Practice</i> for the scheme.
1.9.2	Positive impact/ will minimise/reduce environmental impact. Comments include: <ul style="list-style-type: none"> <li>• less fossil fuel reliance;</li> <li>• provision of power to homes;</li> <li>• modern technologies</li> </ul>		WCC		7	8, 28, 37, 39, 43, 10002, 10006	
1.9.3	Other concerns including: <ul style="list-style-type: none"> <li>• effluent from wet treatment of flue gases;</li> <li>• leaks;</li> <li>• litter from waste vehicles;</li> <li>• fly tipping</li> </ul>				5	6, 17, 22, 23, 25	The environmental impact assessment will assess the environmental effects associated with the scheme development. The site would be subject to on-going good site management.
1.9.4	Suggested mitigation measures including: <ul style="list-style-type: none"> <li>• align with London Plan;</li> <li>• robust CoCP;</li> <li>• support green charities;</li> <li>• recycle/re-use materials from old plant</li> </ul>	GLA	LBE		3	36, 48, 10019	<p>In line with good waste minimisation practice the demolition of the existing EfW would seek to recycle and reuse as many materials as possible. London Plan policies are being taken into consideration in the development of the design.</p> <p>The environmental impact assessment will assess the environmental effects associated with the scheme development, identifying appropriate mitigation measures where required. Such measures will be incorporated into the proposed development design and be contained within the <i>Code of Construction Practice</i></p>

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							for the scheme.
<b>1.10 Further assessments required</b>							
1.10.1	<p>Requests for further assessments including:</p> <ul style="list-style-type: none"> <li>• carbon assessments;</li> <li>• climate change analysis for proposal and alternatives;</li> <li>• noise studies including impact on sensitive receptors;</li> <li>• local health impact of emissions;</li> <li>• protected species survey;</li> <li>• air pollution assessments using WHO levels;</li> <li>• visual impact study;</li> <li>• flood risk assessment;</li> <li>• cumulative impact assessment;</li> <li>• assessment of effects of increased water demand, waste treatment and surface water</li> </ul>	NE GLA Thames Water Utilities Ltd	LBE	LVRPA	5	6, 29, 38, 10016, 10028	<p>The environmental impact assessment will assess the environmental effects associated with the scheme development including effects on air quality and odour (which will examine the impacts of the plant against UK and European Air Quality Standards that are largely based on WHO proposals), ecology, ground conditions and contamination, noise and vibration, socio-economics, visual impact, traffic and transport, water resources, environmental wind and daylight, sunlight and overshadowing. Appropriate receptors will be considered for each of the environmental topic assessments. A cumulative effects assessment will be undertaken for all environmental topics. Supplementary studies also include a flood risk assessment (taking climate change into account) and health risk assessment.</p> <p>Based on our assessment, we considered, that an ERF is the most suitable technology to manage North London's residual waste. It is not practical to undertake climate change analysis on all alternatives, however having determined the most suitable technology an analysis of</p>

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							potential climate change impacts is being undertaken and will be set out in the <i>Sustainability Statement</i> which will form part of the DCO application.
<b>1.11 No concerns/mitigation measures are sufficient</b>							
1.11.1	No concerns/ measures sufficient/ will provide more detailed comments after HRA/EIA	NE GLA	WCC		15	5, 16, 18, 19, 25, 26, 37, 40, 41 45, 47, 10008, 10009, 10019, 10020	Noted