

Mayor of London
Draft Upper Lee Valley OAPF consultation
Planning Decisions
Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

6th February 2012

Dear Mayor Johnson,

Ref: Upper Lee Valley Opportunity Area Planning Framework – Consultation draft, November 2011

Thank you for providing us with the opportunity to respond to the consultation on the above. The North London Waste Authority (NLWA) is one of the six statutory joint waste disposal authorities in England and one of the four in London. We handle nearly 1 million tonnes of municipal solid waste collected by our seven constituent borough councils namely, Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest, of which Enfield, Hackney, Haringey and Waltham Forest are partners in the preparation of the Upper Lee Valley Opportunity Area Planning Framework.

The Upper Lee Valley (ULV) Opportunity Area Planning Framework (OAPF) is of particular relevance to us because the ULV OAPF area is within the NLWA sub-region and will therefore provide a framework for waste planning decision-making within the area which will potentially affect our operations. The ULV OAPF additionally puts significant focus on the role of the Edmonton EcoPark, a strategic waste site protected within the London Plan and identified within the ULV OAPF as the main site for dealing with waste in the area and a potential supply focus for a decentralised energy network. The Edmonton EcoPark is the most significant of the sites currently used by the NLWA for managing north London's municipal waste within the area. The site is also key to the Authority playing its part in realising other Mayoral ambitions as set out in the London Plan and the Mayor's municipal waste management strategy specifically the ambition to reach as near as possible to zero waste to landfill by 2031 and regional self sufficiency targets as set out in the London Plan.

Our response to the consultation draft ULV OAPF is focussed on four key aspects of the document:

- The strategic role of the Edmonton EcoPark;
- Funding for a decentralised energy network;

- Opening up the Lee Valley Regional Park and specifically the location of proposed paths west to east crossing Meridian and Watermead Ways into the Regional Park; and
- Traffic and transport

Our response is referenced where appropriate to the chapters in the ULV OAPF consultation document.

Whilst the Authority is supportive of the regeneration objectives and the principles contained within the ULV OAPF we have some specific concerns in relation to the proposed implementation of the vision. Our key concerns are:

- That proposals in the ULV OAPF do not conflict with existing sub-regional and regional plans, namely the submission draft North London Waste Plan and the London Plan which take precedence;
- That some of the ambitions within the ULV OAPF to use heat generated from north London's municipal waste result in proposals for the Edmonton EcoPark which could potentially constrain the Authority's ability to deliver on statutory objectives in relation to waste management for the area;
- That whilst the Authority is supportive of a decentralised energy network for the area and is working with the partners on this, the EcoPark site may not be able to be used for some of the supporting infrastructure which is proposed in the ULV OAPF; and
- That the ULV OAPF does not restrict the potential to develop waste transport by water along the River Lee which will reduce the impact of increased road traffic in the ULV.

A summary of our key comments is included at the start of our response, but if you require any further clarification of the points raised in our response or have additional queries please do not hesitate to contact me.

Yours sincerely



Tim Judson
Director of Procurement

Response from the North London Waste Authority to the Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF)

Consultation draft, November 2011

Summary of Key Points¹

1. The Authority is supportive of the positive strategic vision for the Upper Lee as identified within the consultation draft OAPF. (Para: 2.2)
2. The Authority is also supportive of the principles of development and believes that waste and resource management can make a positive contribution to the regeneration of the area but that there are some tensions between OAPF objectives and those for waste management, particularly in relation to the use of the EcoPark. (Para: 3.3)
3. As an over-arching point of policy the local ULV OAPF should not bring about opposition to sub-regional and regional planning strategies and documents, namely the North London Waste Plan and the Mayor of London's London Plan. The North London Waste Plan and the London Plan should take precedence over the ULV OAPF. (Para: 1.2)
4. In addition, the ULV OAPF should not be in conflict with the strategic role of the Edmonton EcoPark in managing north London's waste and the design and development proposals for it. (Para: 1.2)
5. The Authority is in the process of procuring waste services and facilities for managing north London's municipal waste for the next 25-35 years. We will need to build new waste facilities in the ULV to meet statutory waste management obligations and to meet regional self sufficiency targets in managing the waste produced in the area. It is imperative that the ULV OAPF does not contradict the Authority's and boroughs' obligations in this regard. In particular it is important that the ULV OAPF does not constrain the future development of the Edmonton EcoPark site for its intended waste management use. (Para: 1.6)
6. The Authority is supportive of implementing a decentralised energy supply as a key strategy for reducing carbon emissions in the area as outlined in borough regeneration strategies and LDFs. (Para: 4.1.5) The Authority is also part of the North London Strategic Alliance Decentralised Energy Network (NLSA DEN) Group and is contributing to the feasibility study on the DEN.
7. The Authority supports the potential for a continuing energy generation role for the EcoPark site, which could provide a supply of heat to a local decentralised energy network, subject to:

¹Paragraph reference numbers relate to the NLWA Response paragraph numbers.

- The energy generation role being consistent with the site's primary purpose as a key waste management facility for north London; and
 - The commercial and financial viability of the network. (Para:4.1.114.1.11)
8. However, any Solid Recovered Fuel (SRF) produced from non-recycled waste in north London will not be able to be used within the Upper Lee Valley or indeed within north London. The locations of the power generating facilities being proposed by the Authority's three shortlisted bidders for its 'fuel use' contract, i.e. the companies shortlisted to take the SRF have already been put forward and it is not allowable under the Scope of the OJEU published in April 2010 to let a separate or additional contract for the use of the SRF. (Para: 4.1.94.1.8)
 9. Despite the lack of availability of SRF, the Authority will continue to engage positively with the North London Strategic Alliance and the ULV OAPF partners about the potential for enabling the current EfW incinerator at the Edmonton EcoPark for heat use, (although NLWA would expect some financial return for any heat supplied). The Authority will also continue to engage with the OAPF partners about the longer term potential for a heat supply to be based upon the land vacated by the current EfW facility once it is decommissioned. Both of these opportunities are actively being considered already by the Authority and LondonWaste Ltd, although the financial viability of heat use is a key consideration in any such discussion. (Para: 4.1.10)
 10. Whilst we acknowledge that standby heating plant and primary pumping stations are usually close to the energy source, the whole of the EcoPark site is likely to be needed in the future for its primary function of managing waste in order to meet Mayoral self-sufficiency targets for waste management. Accordingly there are likely to be constraints to allocating parts of the EcoPark site for alternative uses such as heating plant and a primary pumping station for a decentralised energy network. Another site may therefore be required nearby for standby heating plant and a primary pumping station because the Authority's statutory obligations in terms of managing waste must take precedence in this case when balanced against other demands for land use at the EcoPark. However, the Authority will, as agreed at a recent Decentralised Energy Network steering group meeting, work with Enfield's advisers to seek to understand, and if it is possible to overcome, the potential land use conflict. (Para 4.1.14)
 11. The Authority recommends that references in the OAPF to allocate parts of the EcoPark site for a primary pumping station and standby heating plant for a decentralised energy network should be caveated in the document with a note regarding the potential for such infrastructure to restrict use of the site for municipal waste management services which is its primary function. (Para: 4.1.15)
 12. As the Authority and the London Borough of Enfield will also be developing a planning brief for the EcoPark site the OAPF should leave more detailed issues open

for detailed solutions in the planning brief or reserve these for a future planning application. (Para: 4.1.14)

13. The Authority firmly supports the continued role and protection of the current EcoPark site for waste management uses into the long term. Areas of the site that are currently un-developed also need to be retained to provide operational flexibility as older facilities on the site are decommissioned, thus protecting local tax payers from the additional costs of transporting north London's waste further afield for treatment. (Para: 4.2.7)
14. Potential aims to allocate parts of the site for other uses or to constrain the flexibility for further waste development on the site would potentially conflict with the Authority's statutory duty of waste management. (Para: 4.2.8)
15. The Authority urges the ULV OAPF to avoid including statements within the ULV OAPF document which would not give incoming residents to the Meridian Water development in particular a clear understanding about either the long term continued use of the EcoPark site, the need for the site's redevelopment, including the consolidation of facilities there or the transport associated with having a major waste site and several facilities on the doorstep. (Para: 4.2.10)
16. The Authority additionally urges the ULV OAPF document to specifically state that some leisure activities will be inappropriate (primarily for safety reasons) in close proximity to such a large waste site as the Edmonton EcoPark and that doing so would create unnecessary conflict. (Para: 4.2.11)
17. In terms of funding for a heat network the Authority recommends that the four boroughs involved in the ULV OAPF co-ordinate their consultations on setting CIL tariffs so that developers such as the Authority understand the implications and costings of shared cross-borough infrastructure, such as a decentralised energy network. (Para: 5.4)
18. We would like to see the ULV OPF support local demand for renewable energy from new developments. In particular we would like to see the Meridian Water development taking heat on a commercial basis, subject to financial and technical feasibility. (Para: 5.6)
19. The Authority also cautions against setting CIL tariffs so high as to dissuade developers from the area. The potential impact on the Authority's own development plans could be significant if CIL tariffs are set very high. We would welcome discussion regarding the potential for land or other asset contributions, such as contributions to a decentralised energy network, to be credited against any CIL contributions. (Para: 5.7)

20. The Authority supports the principle of opening up the Lee Valley Regional Park and associated tow path alongside the river Lee by introducing more east-west paths across the OAPF area into the Park. (Para: 6.3)
21. However, the Authority is concerned about the proposal to put a public footpath across the front of the Edmonton EcoPark site. The proposed line of the path would cut directly across the front and main vehicle entrance to the EcoPark site used by all staff and waste vehicles using the site, including 18 tonne bulk vehicles. The Authority therefore has significant safety concerns regarding this proposal to put a public footpath across the front of such a busy operational waste facility site. (Para: 6.5)
22. The Authority suggests that the cost of overcoming health and safety concerns e.g. needing to fully enclose a footpath across the EcoPark and also build a bridge over the main site entrance road, combined with the logistics and cost of building a new pedestrian bridge across the river Lee in order to open up the access to the Lee Valley Regional Park at this point are prohibitive. This is not an appropriate proposal, unless others are prepared to pay for the development of a safe route. (Para: 6.7)
23. The current road infrastructure may also be inadequate in the vicinity of the EcoPark if additional residential movements are going to take place in addition to already planned increases in waste transport movements. (Para: 7.2)
24. To minimise the impact of waste traffic, the Authority is investigating the use of the river Lee for waste transport from the Edmonton EcoPark. Waste is an ideal material to be transported by water and this sustainable means of transport can significantly reduce the carbon impact associated with transport of materials. However, there are some practical and financial viability issues to be overcome in order to realise this approach. The ULV OAPF should not constrain any opportunities for freight transport along the river Lee if it is otherwise found to be viable. (Para: 7.4)
25. The Authority also notes that there is an intention to create additional bridges over the Lee Navigation as part of the OAPF (and Meridian Water) proposals. The Authority comments that the design of any new bridges should not fetter future uses of the river Lee and accordingly that any new bridges have sufficient head room, whilst recognising that it may be less expensive to build lower bridges this should not conflict with the potential for long term freight or leisure use on the river Lee. (Para: 7.7).

1. Relevance of the Framework to the NLWA

- 1.1. The North London Waste Authority (NLWA) is one of the six statutory joint waste disposal authorities in England and one of the four in London. We handle nearly 1 million tonnes of municipal solid waste collected by our seven constituent borough councils namely, Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest of which Enfield, Hackney, Haringey and Waltham Forest are partners in the preparation of the ULV OAPF. The ULV OAPF area lies completely within the NLWA sub-region and includes a number of existing waste sites and facilities which are currently used by the NLWA and/or its constituent boroughs namely:
- I. The Edmonton EcoPark, a strategic waste site protected within the London Plan and identified within the ULV OAPF as the main site for dealing with waste in the area and a potential supply focus for a decentralised energy network. The EcoPark currently hosts an energy-from-waste incinerator which has the capacity to generate approximately 55 MW of electricity, an 'in-vessel' composting plant, a road transfer station, ash and wood recycling operations and a bulky waste recycling facility. The site is also registered as a 'designated collection facility' for waste electrical and electronic equipment and has hosted trials of moving waste by water from its wharf adjacent to the river Lee.
 - II. Park View Road household waste recycling centre (HWRC) – one of two Haringey HWRCs.
 - III. Marsh Lane depot – a proposed new depot for Haringey Council and potential site for the re-location of the Park View Road HWRC.
- 1.2 The Authority recognises that planning authorities will be expected to reflect and give maximum planning weight to the finalised ULV OAPF when preparing planning documents, and to refer to and take account of the guidance when considering planning applications. Accordingly the ULV OAPF is a highly significant document for the NLWA as we or our contractors will be preparing a significant number of planning applications for new waste facilities over the next few years in the OAPF area and the OAPF will be a guiding document for local planning authorities when considering these. However, as an over-arching point of policy, the local ULV OAPF should not bring about opposition to sub-regional and regional planning strategies and documents, namely the North London Waste Plan and the Mayor of London's London Plan. The North London Waste Plan and the London Plan should take precedence over the ULV OAPF. In addition, nothing in the ULV OAPF should be in conflict with the strategic role of the Edmonton EcoPark in managing north London's waste and the design and development proposals for it.

NLWA comment

- 1.3 The Authority supports the development of an OAPF for the Upper Lee Valley and believes that waste and resource management can make a positive contribution to the regeneration of the area. In particular the Authority:
- I. Supported a well attended “Waste and Regeneration in the Upper Lee Valley” event, held at the Ecopark on 13th January 2009. The event was introduced by the Chair of the NLWA, Cllr. Clyde Loakes, included a workshop session on regeneration opportunities from waste and a presentation from Tim Judson, the NLWA’s Director of Procurement.
 - II. Participates in the North London Strategic Alliance Decentralised Energy Network (NLSA DEN) Group, including contributing to the work commissioned and being undertaken by Parsons Brinckerhoff about the feasibility for a decentralised energy network in the Upper Lee Valley.
 - III. Has responded positively to a number of consultations on spatial strategies affecting parts of the ULV area – specifically the Meridian Water Masterplan and the North London Waste Plan. The Authority has also engaged fully with all the stages of consultation on the London Plan which sets the strategic policy context for the OAPF.
- 1.4 The Authority’s statutory obligation is to manage the municipal waste collected in north London in compliance with national and London Mayoral strategies. However, this is a time of significant change for the Authority as we are in the process of procuring new waste services and facilities for managing north London’s municipal waste for the next 25 – 35 years following completion of a 20 year contract with LondonWaste Ltd in 2014.
- 1.5 The Authority’s strategic approach includes meeting Mayoral waste and spatial strategy targets to recycle 50% of north London’s waste by 2020 and manage 85% of London’s waste within the capital by 2020 and to reach as near as possible to zero waste to landfill by 2031. As a result of these ambitions the Authority will need to build new waste facilities within the sub-region and either the Authority or its contractors will be submitting planning applications for new waste facilities within the sub-region over the forthcoming years, including for facilities at the Edmonton EcoPark. It is also the case that in general most of the newer recycling led technologies which will need to be developed are more space hungry in terms of waste throughput per square metre of treatment capacity than the existing EfW incinerator for example.
- 1.6 Accordingly there will be significant pressure on land allocated for municipal waste management in the ULV in forthcoming years. It is imperative that the ULV OAPF does not contradict with the Authority’s statutory obligation to manage municipal waste and the constituent boroughs’ obligations regarding regional self sufficiency in waste management. In particular it is important that the ULV OAPF does not

constrain the future development of the EcoPark site for its intended waste management use.

2. Vision for the area

2.1. The vision for the area as set out in the consultation draft OAPF is for an exemplar green valley, supporting sustainable communities in which there will be:

- A fully accessible network of green and blue spaces and networks between them will be improved.
- Growth at Tottenham Hale, Blackhorse Lane, Central Leaside and Ponders End.
- Development and redevelopment opportunities along the A1010 corridor will be optimised.
- Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities.
- Over 15,700 new well designed eco homes by 2031 served by renewable and/or low carbon energy.
- High quality sustainable neighbourhoods with a range of housing, shops and supporting facilities to meet the needs of local people.
- Significant investments and improvements to transport infrastructure and improvements to help people move more easily through the area by walking and cycling.
- Full integration between the existing communities and the opportunities of jobs, homes and services provided as part of the new developments

NLWA comment

2.2. The Authority is supportive of the positive strategic vision for the Upper Lee as identified within the consultation draft OAPF.

3. Waste management and green industries as drivers for change

- 3.1. Waste management and green industries are seen as key drivers for change within the OAPF. 'Green industries' are defined within the document as including businesses engaged in reducing the carbon footprint of households and businesses and the management of waste itself. The OAPF notes that this sector in London is expected to grow by 18,000 jobs by 2013 with 2,200 jobs accessible to those with low skills. The Upper Lee Valley is identified as having over 50 years of experience in waste management and the space and infrastructure to grow the sector.
- 3.2. Chapter 5 of the OAPF covers 'energy, waste and water' and outlines six key principles for development:
- Creation of an exemplar zero carbon community
 - Delivery of an Upper Lee Valley decentralised energy network
 - Utilisation of the Edmonton EcoPark
 - Promotion of green industries
 - Promotion of the Blue Ribbon Network
 - Comprehensive water management

NLWA comment

- 3.3. The Authority is supportive of the principles of development and believes that waste and resource management can make a positive contribution to the regeneration of the area but that there are some tensions between OAPF objectives and those for waste management, in particular in relation to the use of the EcoPark which are outlined in more detail in our response below.
- 3.4. Our detailed response focuses on four key aspects of the ULV OAPF:
- The strategic role of the Edmonton EcoPark;
 - Funding for a decentralised energy network;
 - Opening up the Lee Valley Regional Park and specifically the location of proposed paths west to east crossing Meridian and Watermead Ways into the Regional Park: and
 - Traffic and transport.

4. The strategic role of the Edmonton EcoPark

4.1. Energy

- 4.1.1. Chapter 5 of the OAPF focuses on energy, waste and water and it is principally in relation to this chapter that the Authority's comments on the strategic role of the Edmonton EcoPark are made. The comments are organised according to the headings within the chapter.
- 4.1.2. The OAPF identifies the EcoPark as an asset of the ULV and the main site for dealing with waste in the area. The OAPF also identifies the EcoPark as a key source of heat and as the 'preferred location as the supply hub for the Upper Lee Valley decentralised energy network'. Further feasibility work for the decentralised energy network is planned. However, the OAPF states (section 5.6) that '... any heat or power generated at the Eco Park should stay within the Upper Lee Valley. It should not be exported out to the rest of the country.'
- 4.1.3. The OAPF states that one of the guiding principles of the decentralised energy network will be that: 'All new development within the opportunity area will be required to connect to the decentralised energy network.' In addition the OAPF states that: 'Provision will need to be made for a site within the Edmonton EcoPark or close by that could serve as a primary pumping station and top-up standby heating plant for the decentralised energy network. Its precise location and floorplate will be assessed as part of the feasibility study.' Given its importance in managing waste and proposed role in supplying a decentralised energy network, the framework identifies the EcoPark as the 'focus for green industries over the plan period.' (Section 2.5).
- 4.1.4. This proposed role for the EcoPark is also identified within the emerging sub-regional spatial waste strategy for the area – the North London Waste Plan (NLWP) which states that "Any development on the site should consider opportunities for local energy provision, taking account of the findings and recommendations of the emerging Upper Lee Valley energy strategy and Enfield's Renewable and Low Carbon Energy Study."

NLWA comment

- 4.1.5. The Upper Lee Valley figures strongly in borough regeneration strategies and LDFs, which all include a commitment to decentralised energy supply as a key strategy for reducing carbon emissions. The Authority is supportive of this approach.

Background

- 4.1.6. **Today** - the EcoPark site has the capacity to generate approximately 55 MW of electricity from the on-site energy-from-waste (EfW) facility, of which 85% is

exported from the site. The EfW facility is currently a power only facility and has a life expectancy in its current form of around 10 years. The facility provides the potential for heat recovery to supply a decentralised energy network. However, in order to realise this potential it would be necessary to:

- Overcome some technical issues, although these appear to be solvable;
- Finance the capital costs of the necessary investment;
- It would be necessary to have the plant for running for at least 10 years to have a viable project; and
- Provide some recompense for the loss of power resulting from using the heat, which could be expected to be in the form of heat income.

4.1.7. **In the future** – the remainder of the EcoPark site will be used for new waste facilities built as a result of the Authority's ongoing long term procurement process.

Procurement process

4.1.8. The NLWA is currently undertaking a competitive procurement for future waste disposal/treatment services and new infrastructure that will serve the seven North London constituent boroughs for a 25-35 year period from the end of the current contract with London Waste Ltd (now wholly owned by NLWA) in 2014.

- The procurement is divided between a contract for waste services, including the production of a solid recovered fuel (SRF) and a separate contract for energy generation from the use of that fuel.
- As part of the contractual arrangements, the NLWA intends to sell LondonWaste Ltd to the waste services contractor, although NLWA will retain ownership of the Edmonton EcoPark site. NLWA's outline business case reference project envisages that the waste services contractor will build a Mechanical Biological Treatment (MBT) plant for residual waste at the Edmonton EcoPark site (as well as one at Pinkham Way) that will produce the SRF alongside material for recycling. The MBTs will replace the current reliance on the existing EfW incinerator plant at Edmonton and landfill disposal for material that isn't recycled or composted.

Prospects for fuel use

4.1.9. Any SRF produced in north London as a result of the above procurement process will not be able to be used within the Upper Lee Valley or indeed within north London.

- In terms of the Fuel Use Contract, the NLWA procurement strategy is predicated on SRF production providing the best prospect for a sustainable disposal solution (i.e. supplying Combined Heat & Power and/or decentralised energy systems where the demand exists). The Authority has announced the location of the three bidders' proposals for using the SRF to generate power, which are respectively in Hertfordshire, Kent and East London.
 - In the context of the above and the NLWA being engaged in an advanced stage of a live procurement, there is no realistic prospect that Contract SRF could be diverted from the contractual arrangements that will ultimately be agreed with the fuel use contractor and the location associated with these arrangements. In this regard the NLWA initially advertised the fuel use contract in its OJEU notice with 2 options, bidders being able to bid for either one large or two smaller fuel use contracts. This would have potentially provided an opportunity for some of the SRF to be used locally. However, primarily linked with the difficulties of obtaining a viable project linked to domestic heat use, and upon evaluation of the outline solutions the procurement has progressed to the detailed solutions stage with bidders who tendered for the single large contract only and with energy solutions based at the locations listed above. It is also not allowable under the Scope of the OJEU published in April 2010 to let a separate or additional contract for the use of the SRF.
 - In addition the market for SRF is strong; the Authority's Outline Business Case for PFI credits concluded that "there is more than sufficient potential demand" to satisfy the Authority's anticipated production of circa 300,000 tpa of SRF. In terms of the Upper Lee there is a mis-match between the heat generating potential of the municipal waste which the Authority has a statutory obligation to manage and the heat demand in the area. The waste which is managed by the Authority will produce substantially more heat than local requirements. It is therefore not possible for heat or power generated from this material to stay in the ULV or north London. However, any Solid Recovered Fuel (SRF) produced from non-recycled waste in north London will not be able to be used within the Upper Lee Valley or indeed within north London. The locations of the power generating facilities being proposed by the Authority's three shortlisted bidders for its 'fuel use' contract, i.e. the companies shortlisted to take the SRF have already been put forward.
- 4.1.10. However, there is a more tangible potential longer term opportunity for producing heat from any facility that replaces the current EfW incinerator and in the shorter term to capture some heat from the existing facility. The NLWA intends that the waste services contractor will, under a separate lease, be able to operate the existing EfW facility through to the end of its working life. Thereafter, the land on which the existing EfW sits will be available for an alternative waste use in the longer term once the EfW incinerator is decommissioned. The report commissioned by the North London Strategic Alliance from Parsons Brinckerhoff also indicates that the NLWA may consider a smaller EfW facility to be

appropriate to replace the current EfW plant and that this could potentially be used to support a local decentralised energy solution. The Authority will continue to engage positively with North London Strategic Alliance (NLSA) about the potential for enabling the current incinerator for heat use, although NLWA would expect some financial return for any heat supplied, and the longer term potential for a heat supply to be based upon the land vacated by the current EfW facility once it is decommissioned. Both of these opportunities are actively being considered already by the Authority and LondonWaste Ltd, although the financial viability of heat use is a key consideration in any such discussion.

NLWA's position

4.1.11. The NLWA is a member of the DEN project stakeholder group and is also fully aware of pre-feasibility work findings to determine the feasibility of a DEN within the ULV area. The Authority is also supportive of the principle of the EcoPark supplying heat to a decentralised energy network and of 'Option 1' outlined within Chapter 5 of the OAPF for Central Leaside to act as a supply hub for supplying heat to the opportunity area. The Authority supports the potential for a continuing energy generation role for the EcoPark site, which could provide a supply of heat to a local decentralised energy network, subject to:

- This energy generation role being consistent with the site's primary purpose as a key waste management facility for north London;
- Commercial and financial viability.

4.1.12. The Authority will continue to work actively with its partners in the ULV to identify, plan for and enable a long term energy solution at the EcoPark which is sustainable and which can be operated in a way which mitigates local environmental impacts such as air quality, traffic, noise and local amenity.

4.1.13. Given the plethora of more detailed spatial planning documents currently in preparation, including the Central Leaside Area Action Plan and the EcoPark Planning Brief Supplementary Planning Document it is appropriate that the ULV OAPF does not set out detailed policies for the EcoPark site but instead establishes the overall principles as set out above.

4.1.14. The Authority also notes the statement in the OAPF that "Provision will need to be made for a site within the Edmonton EcoPark or close by that could serve as a primary pumping station and top-up standby heating plant for the decentralised energy network. Its precise location and floorplate will be assessed as part of the feasibility study." The Authority will participate in the next stage of the feasibility study, but comments here that:

- Whilst we acknowledge that standby heating plant and primary pumping stations are usually close to the energy source, the whole of the EcoPark site is likely to

be needed in the future for its primary function of managing waste in order to meet self-sufficiency targets. It is also the case that generally most of the newer recycling led technologies which will need to be developed on the site are more space hungry in terms of waste throughput per square metre of treatment capacity than the existing EfW incinerator so there will be some pressure on space on this site. Accordingly there are likely to be constraints to allocating parts of the EcoPark site for alternative uses such as heating plant and a primary pumping station. The Authority is likely to need all of the site for waste management use if it is to meet Mayoral ambitions in terms of regional self sufficiency in managing waste. Another site may therefore be required nearby for standby heating plant and a primary pumping station because the Authority's statutory obligations in terms of managing waste must take precedence in this case when balanced against other demands for land use at the EcoPark. However, the Authority will, as agreed at a recent Decentralised Energy Network steering group meeting, work with Enfield's advisers to seek to understand, and if it is possible to overcome, the potential land use conflict.

- The Authority and the London Borough of Enfield are preparing a Planning Brief for the EcoPark site which will form part of the Enfield's LDF. The Planning Brief will set out a framework for the development of the site, zoning specific areas as appropriate. It will be necessary to avoid conflicts between the ULV OAPF and the planning brief or for a future planning application. If necessary, the OAPF should leave issues open for detailed solutions in the planning brief or reserve these for a future planning application. The draft Planning Brief will be subject to public consultation later this year. Any requirements coming out of the DEN feasibility study for the EcoPark site to include a primary pumping station and top-up standby heating plant should be fed in to the local consultation process on the EcoPark planning brief subject to production timescales of both documents allowing this.
 - Allocating part of the EcoPark site for a primary pumping station and top-up standby heating plant also potentially constrains the flexibility that bidders have for using the site for waste use to its full extent. As noted above, the Authority's primary objective in using this site is for waste management rather than power generation as this is the Authority's statutory obligation and the site's allocation within the North London waste Plan and its potential contribution towards mayoral waste apportionment targets additionally recognises this role.
- 4.1.15. As a result the Authority recommends that references in the OAPF to allocate parts of the EcoPark site for a primary pumping station and standby heating plant for a decentralised energy network should be caveated in the document with a note regarding the potential for such infrastructure to restrict use of the site for municipal waste management services which is its primary function. The OAPF could instead identify the need for such plant as part of a future DEN but leave open a number of options for siting this plant elsewhere in the vicinity or on the EcoPark if waste requirements allow this.

4.2. Waste

- 4.2.1. The OAPF notes that the Edmonton Ecopark is currently the main site for dealing with waste in the Upper Lee Valley and that it has space for further consolidation and the potential to provide heat and power to neighbouring developments. The Authority understands that consolidation refers to additional new municipal waste facilities procured by the Authority consolidating on the site, rather than the consolidation of existing third party facilities moving on to the EcoPark. Our response is made in the light of this understanding.
- 4.2.2. The OAPF proposes that neighbouring industrial location sites could accommodate waste uses creating a hub of green industries around the EcoPark.
- 4.2.3. A number of additional documents similarly support the continued strategic role of the Edmonton EcoPark for waste use.

- 4.2.4. The Enfield Core Strategy, states that:

“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 including the future decommissioning of the incinerator.”

In the Enfield Core Strategy, the Edmonton EcoPark is safeguarded as a strategic industrial location and it lies within the Central Leaside area which is subject to specific policies in the Core Strategy and the preparation of the Central Leaside Area Action Plan.

- 4.2.5. Core Policy CP22 also identifies the role of the EcoPark as follows: “Continuing to support the use of Edmonton Eco-Park as a strategic waste site and working with the North London Waste Authority and the site operator to maximise the use of the site with more sustainable and efficient waste management processes including the future decommissioning of the current incinerator...” Core Policy 37 also identifies the role of the EcoPark in waste management as follows: “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 Harbet Road estates, as well as the Locally Significant Industrial Sites; The Claverings Estate and the southern part of the Montagu Industrial Area, will be retained and intensified. Waste management will be supported at the Edmonton Eco-Park site in line with Core Policy 22....”

- 4.2.6. The sub-regionally significant strategic waste management role of the EcoPark site is also recognised within the draft sub-regional spatial strategy, the North London Waste Plan, in which the site is identified as a “key site for the delivery of waste services”

NLWA Comment

- 4.2.7. The Authority firmly supports the continued role and protection of the current EcoPark site for waste management uses into the long term. The site includes un-developed areas at present and thus provides opportunities to assist north London in playing its full part in contributing to Mayoral self sufficiency targets for waste management. The undeveloped areas need to be retained for new waste management facilities and also to provide operational flexibility. As older facilities on the site are decommissioned, new facilities built on undeveloped plots can provide a continued waste management service thus protecting local tax payers from sudden increases in waste management costs as north London’s waste has to be sent further afield for treatment. The development of a planning brief for the site will establish a planning framework for future development.
- 4.2.8. Potential aims to allocate parts of the site for other uses or to constrain the flexibility for further waste development on the site would potentially conflict with the Authority’s statutory duty of waste management. If space becomes available on the site after bidder solutions have been put forward, the Authority recognises that there may be competing demands for the use of this space and there may be a preference to see this space used for reuse or other waste management functions further up the waste hierarchy, rather than for other functions.
- 4.2.9. In relation to the role of the EcoPark as a potential focus for green industry development around it, the Authority is supportive of this approach. The Authority is interested in seeing recyclate markets develop further as a healthy recycling market feeds through into strong demand for. A healthy demand for recyclate also potentially means higher prices are paid for the material, which benefits local tax payers in terms of the income generated from recycling offsetting the additional costs of separate collections, transport and sorting. ‘Closing the loop’ i.e. processing recyclable material into new products locally could provide additional jobs and reduced carbon impacts too. However, market development work would be necessary to establish the likely potential of this being realised. At this stage it would be helpful if the ULV OAPF recognised this potential opportunity.
- 4.2.10. It has also been the case elsewhere that new residents moving in to new developments of flats and housing are not fully aware of the function of nearby waste facilities when they move in and this results in bad neighbour relations from the outset. The Authority urges the ULV OAPF to avoid including anything within the ULV OAPF document which would not give incoming residents to the Meridian Water development in particular a clear understanding about either the long term continued use of the EcoPark site, the need for the site’s

redevelopment, including the consolidation of facilities there or the transport associated with having a major waste site and several facilities on the doorstep.

- 4.2.11. The Authority additionally urges the ULV OAPF document to specifically state that some leisure activities will be inappropriate (primarily for safety reasons) in close proximity to such a large waste site as the Edmonton EcoPark and that doing so would create unnecessary conflict.

4.3. Water

- 4.3.1. Chapter 5 of the OAPF does not specifically mention the EcoPark in the context of either the blue ribbon network or water management although figure 5.7 identifies the EcoPark as a utility within a flood risk zone.
- 4.3.2. The North London Waste Plan also recognises that the currently undeveloped parts of the site are suitable for general waste use, but that groundwater protection and flood risk may impose restriction in parts of the site. It is anticipated that the planning brief for the site will address these issues.

NLWA Comment

- 4.3.3. The Authority does not have any further comment on the water aspects of the OAPF as applied to the EcoPark site, although the potential for sustainable transport and specifically water transport from the site is discussed in more detail in section 7 and the Authority accordingly provides comments there too.

5. Funding for the heat network and other infrastructure

- 5.1. The OAPF considers the investment framework in three 'cross-boundary' areas: energy and waste, transport and landscape as well as the investment required to unlock development in the strategic grow areas of Blackhorse Lane, Tottenham Hale, Central Leaside, Ponders End and the A1010 corridor. The investment framework is specifically identified in Chapter 10.
- 5.2. A number of key projects have been identified as requiring funding including promoting shared energy and heat generation and promoting decentralised energy networks. The funding sources identified within the OAPF, include Section 106 and Community Infrastructure Levy (CIL) payments applied to planning permissions.

NLWA comment

- 5.3. The Authority recognises the need to consider the approach to infrastructure financial support within the OAPF and is aware that CIL tariffs in particular might provide an appropriate route for making supporting contributions to the same.
- 5.4. Without yet knowing what level of financial support might be necessary for different types of infrastructure including a DEN, it is not possible to comment in detail on this approach. However, as a general matter of principle the Authority recommends that the four boroughs involved in the ULV OAPF co-ordinate their consultations on setting CIL tariffs so that developers such as the Authority understand the implications and costings of shared cross-borough infrastructure, such as a DEN.
- 5.5. The Authority recognises that the availability of a DEN can act as an incentive for developers to come into the area, potentially leading to increased land values and also recognises the positive contribution that a DEN could have to a low carbon energy management strategy for the area.
- 5.6. The Authority stresses the need for heat income to be realised from any heat supplied on a commercial basis and in particular we would like to see the ULV OPF support local demand for renewable energy from new developments. In particular we would like to see the Meridian Water development taking heat on a commercial basis, subject to financial and technical feasibility. If a waste-to-energy facility is reconfigured from electricity only to electricity and heat offtake, there will be a negative impact on electricity generation as a result. An income is required by the heat producer to recognise this lost electricity income as well as to recognise the costs of the infrastructure investment and ongoing management of the system. Any costings used for assessing infrastructure financial support must additionally consider how the heat will be paid for.
- 5.7. In addition to the above the Authority also cautions against setting CIL tariffs so high as to dissuade developers from the area. The potential impact on the Authority's own

development plans could be significant if CIL tariffs are set very high. We would welcome discussion regarding the potential for land or other asset contributions such as contributions to a decentralised energy network, to be credited against any CIL contributions.

6. Opening up the Lee Valley Regional Park.

- 6.1. A key objective of the OAPF is to unlock the Lee Valley Regional Park, by providing new open space links across the site and into the park. One of the proposed improvements outlined in section 7.2 is to allow access west to east across the south of the Edmonton Ecopark site into Thames Water land to the east of the EcoPark. It is proposed that the Thames Water land is transformed into landscaped marshland which will act as additional flood storage to mitigate the risk of flooding on the Meridian Water development. An existing footpath sign points the way across the river Lee in the line of the proposed path, although the signed direct route to Angel Road station which is marked is currently inaccessible due to the river, a timber yard and then the EcoPark, none of which is publicly accessible.



Figure 1 Footpath sign on the river Lee tow path to the east of the EcoPark



Figure 2 Looking towards the west bank of the river Lee opposite the footpath sign to Angel Road station above

- 6.2. In addition to the above, existing paths (not marked on the maps in Chapter 7 of the ULV OAPF) also run alongside the current Park View Road/refuse vehicle depot in Ashley Road, Tottenham into the Lee Valley Regional Park and alongside the proposed new depot at Marsh Lane, Northumberland Park.



Figure 3 Western entrance to existing path running between the existing London Transport Depot (to the right of the path) and proposed Haringey vehicle depot (left of path) on Marsh Lane



Figure 4 Eastern entrance to existing path running between the existing London Transport Depot (left of path) and proposed Haringey vehicle depot on Marsh Lane (right)

NLWA Comments

- 6.3. The Authority supports the principle of opening up the Lee Valley Regional Park and associated tow path alongside the river Lee by introducing more east-west paths across the OAPF area into the Park.
- 6.4. Both of the existing paths alongside the current and the proposed replacement Haringey depots are well used and the Marsh Lane path is particularly useful as a west-east route into the Lee Valley Regional Park because it exits onto Watermead Way almost directly opposite a bus-stop and directly opposite one of the main park entrances with an associated car park. Although this footpath it is not as direct a route from Northumberland Park train station as walking down Marsh Lane and then Marigold Road, it is clearly used as an existing pedestrian access route into the Park and its existence is unlikely to cause any operational concerns during the redevelopment of the depot other than for a short period of time, during which pedestrians could be potentially re-routed along Marsh Lane and Marigold Road.
- 6.5. However, the Authority is concerned about the proposal to put a public footpath across the front of the Edmonton Ecopark site in line with the signpost shown in the Fig. 1 above. The proposed line of the path would cut directly across the front and main vehicle entrance to the EcoPark site used by all staff and waste vehicles using the site, including 18 tonne bulk vehicles. The Authority therefore has significant safety concerns regarding this proposal to put a public footpath across the front of such a busy operational waste facility site.
- 6.6. The City Corporation of London's Walbrook Wharf river waste transfer station has the national Thames path cutting across but the path is enclosed there with high sided wire fencing and is closed to pedestrians when river barges are being loaded with waste on the adjoining jetty for health and safety reasons. However, there is no

public access to the Western Riverside waste transfer station at Smugglers Way which is on a similar route; the path is instead re-routed around the site.

- 6.7. The Authority suggests that the cost of overcoming health and safety concerns e.g. needing to fully enclose a footpath across the EcoPark and also build a bridge over the main site entrance road, combined with the logistics and cost of building a new pedestrian bridge across the river Lee in order to open up the access to the Lee Valley Regional Park at this point are prohibitive. This is not an appropriate proposal, unless others are prepared to pay for the development of a safe route. A footpath across the front of the EcoPark site would also severely disrupt daily operations at the site. Accordingly the Authority objects to this proposal.
- 6.8. In the Authority's view it would be preferable for a new east-west access route to run to the south of the North Circular road potentially using the existing pedestrian footbridge across the North Circular to route pedestrians from the south of the North Circular to the north and then west to east in front of the EcoPark site rather than through it. This would avoid operational disruption at the site, raise fewer health and safety concerns from our perspective and avoid the need to build a new pedestrian footbridge across the river Lee at the signpost show in Figure 1.
- 6.9. Finally it is noted that some of the existing tow path route is not shown on Figure 7.3 in the consultation document. Specifically from Stonebridge Lock northwards there is an existing towpath route already which continues up the North Circular. This is not marked on the map and instead new routes alongside the river Lee are indicated as being necessary. Similarly the tow path continues on the east bank of the river Lee northwards beyond the North Circular, as shown in the photograph of the signpost above, again this is not marked on the map figure 7.3.



Figure 5 Tow path to the east of the river Lee to the south of the North Circular



Figure 6 Tow path to the east of the river Lee to the south of the North Circular

7. Traffic and transport, including water transport

- 7.1. The scale of housing and employment development within the area will lead to increases in transport movements which are outlined in the OAPF alongside plans to alleviate congestion caused by the same. The increase in road traffic in particular within the Central Leaside area will have a potential impact upon the use of the EcoPark over time, although the proposed improvements in passenger transport arrangements in the area will also be of benefit to EcoPark site staff.

NLWA comment

- 7.2. Waste traffic movements to and from the Ecopark site are likely to change in the future and potentially increase if a different range of facilities are co-located on the site. There will also be a period of overlap of operation when the EfW facility on the EcoPark is still operational and new facilities have also been built and are operational. This period will result in a significant increase in the waste throughput of the site and an increase in associated traffic movements to and from the site. The Authority is working closely with the London Borough of Enfield and other partners to identify any resultant impacts. Some transport modelling work will be carried out for the EcoPark planning brief and as part of any planning application. It is recommended that that Authority shares this with the OAPF partners and that continued dialogue between the OAPF partners and the Authority is maintained regarding the same. However, the Authority cautions that there needs to be a recognition that realising waste management objectives in terms of self sufficiency will require more 'within London' movements of waste, particularly by road and that these could well impact upon development proposals around major waste facilities such as the Edmonton EcoPark. The current road infrastructure may be inadequate in the vicinity of the EcoPark if additional residential movements are going to take place in addition to already planned increases in waste transport movements. In particular the Eley Estate and the EcoPark access routes can already become blocked when there are roadworks or accidents on Advent Way or in the area of the North Circular underpass. The whole area can become gridlocked quite quickly. If Meridian Water is developed and more traffic is flowing on and off this particular North Circular junction, the risks and scale of the traffic disruption will multiply. With the regeneration of this area the road capacities and traffic flows will need to be improved in tandem with the development of the area.
- 7.3. The NLWA is currently investigating the feasibility of using the Lee Navigation for transport by barge. Should this be found to be feasible it is likely that the NLWA would propose works to the EcoPark wharf on the river Lee to enable this. However, we would highlight the need for significant capital expenditure to enable water transport to happen. The GLA and the local planning authorities would additionally need to support investment in the whole of the navigable waterway network to make water transport opportunities feasible and viable. The feasibility and viability of water transport additionally depends on the destinations for material leaving the EcoPark. It

is necessary for the local development authorities to be realistic about the operational constraints too.

7.4. So whilst waste is an ideal material to be transported by water and this sustainable means of transport can significantly reduce the carbon impact and local transport 'nuisance' there are some practical and financial viability issues to be overcome in order to realise this approach. However, in theory, the work that has been undertaken on the lower part of the Lee Navigation associated with the Olympics Games Site development provides a good potential for any transport by water from an Upper Lee Valley site and the NLWA is pleased to be working with British Waterways to fully investigate the opportunity this presents. The ULV OAPF should not constrain any opportunities for water transport of waste to take place if the above conditions otherwise make this a feasible and viable option.

7.5. The principle of using water to transport waste in a sustainable way is also supported in national, regional and local planning policy. Policy 5.17 Waste Capacity of the recently adopted London Plan, states:

"Proposals for waste management should be evaluated against... the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the scope to maximise the use of rail and water transport using the Blue Ribbon Network" and "Land to manage borough waste apportionments should be brought forward through...safeguarding wharves (in accordance with policy 7.26) with an existing or future potential for waste management".

7.6. Furthermore transport of waste by water is supported by Enfield's own Core Strategy, Policy 22 Delivering sustainable waste management states: *"The Council will require active consideration of sustainable transport of waste where it is not treated at source (e.g. via rail and water)".*

7.7. The Authority also notes that there is an intention to create additional bridges over the Lee Navigation as part of the OAPF (and Meridian Water) proposals. The Authority would like to ensure that sustainable transport opportunities are not constrained as a result of these developments. We therefore urge you to ensure that the design of any new bridges will not fetter future uses of the river Lee and accordingly that any new bridges have sufficient head room, whilst recognising that it may be less expensive to build lower bridges this should not conflict with the potential for long term freight or leisure use on the river Lee. Any new bridges should:

- Be at least 2.6 metres above the maximum water level
- Have no mid-river support points.



Figure 7 Edmonton EcoPark wharf

8. Concluding Remarks

- 8.1. In addition to the above, the OAPF includes some other aspects which may affect the Authority's plans for waste management in the future, including design and height guidance for new buildings which the Authority notes, but upon which the Authority has no specific comments.
- 8.2. The OAPF does not specifically mention the need for new waste infrastructure to serve the residential and non-residential properties which are proposed in the area. However, there will be a need for both waste and recycling collection arrangements to be considered in building design and the Authority also suggests that part of the area should be allocated for household and potentially commercial waste bring facilities to ensure that the opportunities to maximise recycling and reuse from all waste are realised.