

# Edmonton EcoPark Supplementary Planning Document

## Joint Adoption and Consultation Statement

(May 2013)

**EDMONTON ECOPARK SUPPLEMENTARY PLANNING  
DOCUMENT**

**JOINT ADOPTION AND CONSULTATION STATEMENT  
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012**

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Annex A: Responses to consultation on the Draft Edmonton EcoPark Planning Brief Supplementary Planning Document (February – March 2013) and changes made to the document pursuant to section 23(1) of the Planning and Compulsory Purchase Act 2004

## **1 Introduction**

- 1.1 The purpose of the Edmonton EcoPark Planning Brief Supplementary Planning Document (SPD) is to provide guidance on the future development of the EcoPark site for sustainable waste management, to support the delivery of objectives set out in the Core Strategy, London Plan and emerging Central Leaside Area Action Plan.
- 1.2 The Edmonton EcoPark SPD was adopted by Council on 16<sup>th</sup> May 2013. This statement includes the Adoption Statement and sets out details on the consultation undertaken during the preparation of the Edmonton EcoPark Planning Brief SPD, as required by regulations 12 and 14 of the Town and Country Planning (Local Development) (England) Regulations 2012 (hereafter referred to as “2012 regulations”).
- 1.3 A Draft Edmonton EcoPark Planning Brief SPD was published for consultation in compliance with regulation 13 from 4<sup>th</sup> February until the 18<sup>th</sup> March 2013. All of the consultation responses received on the Draft SPD have been considered as part of the preparation of the final version of the document, the adoption version of the SPD. In accordance with regulation 12 of the 2012 regulations, this Consultation Statement has been prepared to show how the Council has addressed the main issues raised during the consultation.

## **2 Edmonton EcoPark Planning Brief SPD**

- 2.1 The Planning Brief includes an overarching vision for the site; the opportunities and constraints associated with the site; the principles which future development should follow; and more specific guidance on implementation. The Brief requires the site to be used for sustainable waste management, prioritising recycling and energy recovery in particular. It requires future development to provide the heat source for, and accommodate the infrastructure to help deliver, the Lee Valley Heat Network (LVHN). The SPD sets out ways in which development can respond to the opportunities and constraints identified, including the use of sustainable transport modes, high quality design, and sustainable design and construction methods to reduce transport, visual and environmental impacts.
- 2.2 The Edmonton EcoPark Planning Brief is a Supplementary Planning Document (SPD) to Enfield’s Local Plan and will be a material consideration in the determination of planning applications for the site.

## **3 Adoption Statement**

- 3.1 See overleaf.

## **ENFIELD COUNCIL**

### **ADOPTION STATEMENT: EDMONTON ECOPARK PLANNING BRIEF SUPPLEMENTARY PLANNING DOCUMENT**

#### **Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Planning) (England) Regulations 2012**

In accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is hereby given that the Enfield Council adopted the Edmonton EcoPark Planning Brief Supplementary Planning Document (SPD) on 16<sup>th</sup> May 2013.

The adopted Edmonton EcoPark Planning Brief SPD has been modified pursuant to section 23(1) of the Planning and Compulsory Purchase Act 2004. These modifications are set out in Annex A of this Statement.

Any person with sufficient interest in the decision to adopt the supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision.

Any such application must be made promptly and in any event not later than 3 months after the date on which the Edmonton EcoPark Planning Brief SPD was adopted.

#### **4 Consultation on the Draft Edmonton Planning Brief SPD**

- 4.1 The Draft Edmonton EcoPark Planning Brief SPD was published for a 6 week consultation period from 4<sup>th</sup> February to 18<sup>th</sup> March 2013.

##### *Bodies and persons consulted*

- 4.2 All contacts on Council's Local Plan database, which covers a range of organisations and individuals or 'other' consultees, were notified of the consultation on the Draft SPD. Approximately 1500 individuals and organisations were notified, including specific, general and other consultees; internal officers; and councillors.

##### *How bodies and persons were consulted*

- 4.3 The Draft Edmonton EcoPark Planning Brief SPD was made available online, and paper copies were available at all Council libraries and the Civic Centre.
- 4.4 The document was published on the Council's website ([www.enfield.gov.uk/ecopark](http://www.enfield.gov.uk/ecopark)) as a pdf document and online consultation web pages powered by Objective software (<http://consult.enfield.gov.uk/portal>).
- 4.5 Emails and letters were sent out to all of the specific, general and other consultees on the Local Plan database informing them of the scope of the document, with a link to a copy of the document online and the deadline by which comments had to be submitted. Consultees were also informed of ways of submitting comments, which included using the Objective online consultation software.
- 4.6 An article was published in February/March 2013 edition of the Our Enfield magazine publicising consultation on the Draft SPD – this was circulated to all households in the borough.
- 4.7 An initial Equalities Impact Assessment (EqIA) was carried out in February 2013 to ensure consultation on the draft Edmonton EcoPark SPD promoted equal opportunities. Following consultation, a final EqIA was carried out to assess the potential impacts that the final SPD might have on identified equalities groups.

##### *Summary of main issues raised and how they have been addressed*

- 2.9 In total, 13 responses were received, including representations from the Greater London Authority (GLA), the North London Waste Authority (NLWA), FCC Skanska, the London boroughs of Waltham Forest (LBWF) and Haringey (LBH), and a number of statutory agencies (English Heritage, Natural England, Environment Agency).
- 2.10 The Greater London Authority, Haringey Council, English Heritage, and Friends of the Earth are generally supportive of the SPD, subject to detailed comments. A number of the responses raised detailed issues, and some minor changes

have been made to the document to address these comments. The minor changes seek to:

- Clarify the trends and targets for municipal waste arisings, and reference commercial and industrial waste;
- Recognise the potential impact on the historic environment;
- Clarify the objective for the site related to climate change;
- Reflect the National Planning Framework on heritage, nature conservation, green belt and flood risk issues;
- Provide information on what the approach taken by the Environment Agency;
- Add to the examples of potential transport mitigation measures;
- Clarify s106 requirements related to local employment and transport
- Update the position on Enfield's Development Management Document (DMD), North London Waste Plan (NLWP) and greenway proposals;
- Consider how potential health impacts will be assessed as part of future development;
- Clarify planning application information requirements and the details required in the Transport Assessment;

2.11 The following information provides a list of the remaining substantive issues raised by the representations received and how the Council has considered them in the adoption version of the SPD. A summary of all the written representations received during the consultation period and the Council's response is provided in Annex A.

#### Main Issue 1: The waste hierarchy and consideration of alternatives

2.12 Representations received considered that insufficient weight has been given to applying the waste hierarchy: reduce, reuse, recycle, other recovery and disposal (listed in priority order). The waste hierarchy aims to manage waste as high up on the list for priorities as possible, but the SPD includes a preference for energy recovery and recycling above other tiers in the hierarchy.

#### **The Council's response:**

The SPD considers the waste hierarchy in the context of the specific opportunities associated the Edmonton EcoPark site.

The SPD supports the continued use of the site for waste management use, and prioritises both recycling and energy recovery on the Edmonton EcoPark site. Should the existing EfW site (occupying around 3.65ha of a total site area of approx 15ha) be redeveloped in the future, the Council will expect an equivalent portion of the site to make provision for an energy recovery facility to help deliver a Decentralised Energy Network. The remainder of the site can be used for other waste management use such as reuse and recycling.

Decentralised Energy Network Feasibility Studies (2011 and 2012) conclude that it is feasible and viable. In light of this, the SPD specifically prioritises energy recovery. However, recycling is also prioritised.

#### Main Issue 2: Feasibility, viability and flexibility

- 2.13 Respondents considered that the SPD should take into account issues of feasibility, viability, flexibility to make sure imposed requirements, particularly design, sustainable transport and energy requirements, do not undermine future development of the site.

**The Council's response:**

The SPD elaborates on policies already set out in the adopted Core Strategy and in the London Plan. It does not impose additional policy requirements, it just gives additional guidance on how higher order policies will apply and should be implemented on the Edmonton EcoPark site.

**Main Issue 3: Decentralised Energy Network (DEN)**

- 2.14 It has been suggested that the Council's evidence on DEN is overly optimistic and not robust enough to support the SPD.

**The Council's response:**

The Council considers that it has sufficient evidence to support the position in the SPD. The Decentralised Energy Network Feasibility Studies (2011 and 2012), taking into account the timing for the decommissioning of the EfW in 2020, conclude that a DEN centred on the Edmonton EcoPark is both feasible and viable.

Enfield Council, alongside Haringey Council, have made a public commitment to developing a Business Case for Phase I of the DEN; a meeting of Enfield's Cabinet in December 2012 agreed in principle the proposal to establish a Special Purpose Vehicle (SPV) to deliver the Lee Valley Heat Network and to immediately establish a cross borough legal company structure to take forward the development of an energy company for the DEN. The Council is preparing a Business Case for a DEN to provide more detail on the commercial viability.

The SPD will be kept under review and amended if necessary in the light of any updates arising from plan preparation, such as the Area Action Plans; and any significant changes to evidence on viability which emerges through a completed Business Case.

**Main Issue 4: Future of Plot 1 (existing incinerator site)**

- 2.15 Respondents were concerned that SPD will prevent any form of waste treatment on plot 1 which does not generate heat and that this position is based on insufficient evidence.

**The Council's response:**

The Council considers that it has sufficient evidence to support the position in the SPD. The Decentralised Energy Network Feasibility Studies (2011 and 2012), taking into account the timing for the decommissioning of the EfW in 2020, conclude that a DEN centred on the Edmonton EcoPark is both feasible and viable.

The SPD will be kept under review and amended if necessary in the light of any updates arising from plan preparation, such as the Area Action Plans; and any significant changes to evidence on viability which emerges through a completed Business Case.

**Main Issue: 5: Requirement for whole site proposals**

- 2.16 The SPD requires the submission of a comprehensive planning application taking into account the whole site. Respondents considered that individual planning applications for different parts of the site should be accepted.

**The Council's response:**

The SPD requires development to be considered on a comprehensive basis (including both Plot 1 and 2) so that the cumulative form and impact of development can be assessed. The SPD seeks as much detail as possible to be provided as part of a planning application. It is acknowledged that development is likely to be in phases, and it may be that the degree to which future phases/proposals can be anticipated in their detail will vary over the site and over time. The SPD states that the precise scope of an application can be discussed in pre-application discussions and any detailed issues can be considered at this time.

**Main Issue 5: Potential for water transport**

- 2.17 Respondents considered that the SPD should limited the aspiration to deliver a Freight by Water transport solution to schemes which evidence suggests are technically feasible and economically viable.

**The Council's response:**

Emerging evidence on the feasibility of transport freight, specifically waste material to and from the Edmonton EcoPark site demonstrates that it is possible to implement such a scheme. In accordance with the London Plan (policy 7.26), Enfield's adopted Core Strategy (CP 27), and basis of emerging evidence, the SPD highlights the potential of this site and expects future development to take this into account.

**Main Issue 6: Catchment Areas**

- 2.18 It has been suggested that restricting the sourcing of waste material from a defined catchment area is unnecessarily restrictive and is at odds with Planning Appeal decisions.

**The Council's response:**

The SPD is not prescriptive on this issue and includes sufficient flexibility in case it is not possible to fulfil this objective.

**Main Issue 7: Insufficient consultation**

- 2.19 It has been suggested that 6 weeks consultation is not long enough to ensure a reasoned consideration of the issues by the public and that a final decision should be based on wider debate and be delayed for this to happen.

**The Council's response:**

Consultation on the SPD exceeded the minimum legal requirements. The draft SPD was publicised in the Our Enfield magazine and on the Council's website. All of the contacts on Enfield's Local Plan database were notified (approximately 1500 individuals and organisations). Copies of the document were available online, at the Civic Centre and in all local libraries.



**Annex A: Responses to consultation on the Draft Edmonton EcoPark Planning Brief Supplementary Planning Document (February – March 2013) and changes made pursuant to s23(1) of the Planning and Compulsory Purchase Act (PCPA) 2004**

<b>Response No.</b>	<b>Organisation</b>	<b>Name</b>	<b>Comments</b>	<b>Changes made pursuant to s23(1) of the PCPA (new text shown as bold underlined, strikethrough for deletions)</b>
1	Marine Management Organisation	Angela Atkinson	No comment	No change
2	Highways Agency	Patrick Blake	No comment	No change
3	English Heritage	Nick Bishop	Document needs to recognise the potential impact on the historic environment and future development should assess this.	<p>Amend paragraphs 1.5.27 and 1.5.28 (page 13):</p> <p><i>At a national level, the NPPF recognises that good design is a key aspect of sustainable development, which is indivisible from good planning. Good design should contribute to positively making places better for people; . <b><u>The NPPF also seeks to ensure that heritage assets are conserved and enhanced.</u></b> The EcoPark is a high profile site, any future design needs to be of high quality in order to minimise the visual impact on neighbouring sensitive receptors, <b><u>including any heritage assets.</u></b></i></p> <p><i>Strategic policies in Enfield’s Core Strategy require all developments to be high quality and design led, having special regard to their context <b><u>and character.</u></b> The development of site</i></p>

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				<p><i>specific planning and design briefs for key sites offers the opportunity to set out tailored design standards and guidance.</i></p> <p>Amend paragraph 3.3.2 (page 21):</p> <p><i>This area accommodates leisure venues, open spaces, <del>heritage sites</del> and sports venues including the Lee Valley Golf Course (immediately north of the site), Lee Valley Athletics Centre (to the north of the site) and the Lee Valley Regional Park (to the east of the site). <b><u>This area also includes several heritage sites including the grade II listed Chingford Mill Pumping Station, Chingford Mill Turbine Hall and its associated rails to the east of the site. To the west lies the Montagu Road Cemetery Conservation Area. The site itself lies within the Lea Valley West Bank Archaeological Priority Area.</u></b></i></p> <p>New paragraph after 4.2.17 (page 48):</p> <p><b><u>Future development of the Edmonton</u></b></p>

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				<p><b><u>EcoPark should consider any impacts on the historic environment, for example, visual impacts on the surrounding listed buildings and conservation area as part of their settings, or impacts on deposits in the Lea Valley West Bank Archaeological Priority Area. Developers must identify, and provide appropriate assessment/ investigation of, any heritage assets affected so that potential impacts can be assessed as part of the planning application.</u></b></p>
4	Thames Water	Carmelle Bell	<p>a. SPD should make reference to the Deephams Sewage Works Upgrade project, and include a specific section covering water supply and drainage.</p> <p>b. Figure 3.7 – the legend is not correct it would be helpful to identify the Deephams Sewage Works site.</p>	<p>a. No change. The SPD has been prepared specifically to guide the future development of the Edmonton EcoPark site. It does not cover more wide ranging waste topics, which if relevant, would be considered as part of more strategic policies in Enfield’s Local Plan or through the preparation of the North London Waste Plan.</p> <p>b. Amend legend of figure 3.7 (page 24) to correctly identify the Central Leaside Area</p>

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				Action Plan and Meridian Water Masterplan boundaries.
5	Tottenham & Wood Green Friends of the Earth	Quentin Given	<p>Broadly supportive although raise a number of detailed comments:</p> <ul style="list-style-type: none"> <li>a. The statement in paragraph 1.2.1 about the growth in municipal waste should be checked</li> <li>b. Objectives in paragraph 2.1.2 should minimise CO<sub>2</sub> and other climate change impacts from the whole waste process</li> <li>c. Paragraphs 3.6.34 and 4.2.13 should include the need for a green travel plan encouraging cycling and walking as a priority and improving local cycle lanes</li> <li>d. Welcome proposals to encourage alternative fuelled vehicles and suggest over time that this becomes a requirement for accessing the site</li> <li>e. Welcome proposals to improve biodiversity and sustainable drainage and would like to see Salmon’s Brook re-profiled to support these functions.</li> </ul>	<p>a. Amend paragraph 1.2.1:  <i>There is insufficient infrastructure to treat the amount of waste produced, therefore currently nearly two fifths of the waste generated in north London is sent to landfill. Every year the residents and businesses in north London produce around 2.3 million tonnes of waste with another 2.2 million tonnes of construction, demolition and excavation waste. <del>The amount of municipal waste collected has been increasing at a rate of approximately 3% each year and although arisings have fallen in recent years,</del> <b><u>The amount of municipal waste collected in north London has been in decline since 2006/2007, however, the London Plan assumes that arisings will steadily rise and boroughs are required to meet the targets set out in the London Plan.</u></b> <del>in line with expected growth in housing in north London.</del></i></p> <p>b. Amend paragraph 2.1.2:</p>

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				<p><i>be of exemplary quality developed in accordance with the principles of sustainable design and construction; and</i></p> <p><i>be designed to mitigate and adapt to the impacts of <del>and minimise</del> climate change <b><u>impacts</u></b>, embracing new environmental technologies where appropriate, including the need to manage and reduce flood risk and pollution; to promote sustainable water management and energy efficiency; and enhance biodiversity. <b><u>how development addresses the following key issues: water, energy, biodiversity, transport, and pollution.</u></b></i></p> <p>c. Amend paragraph 4.2.13:</p> <p><i>Any future planning application should include a Travel Plan, <b><u>to be periodically monitored by the Council</u></b>, detailing measures to promote sustainable transport for staff, <b><u>including walking and cycling</u></b>. At present approximately 90% of EcoPark employees travel to work by car</i></p>

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				<p><i>and future development of the site should seek to reduce this by facilitating alternative sustainable modes of transport.</i></p> <p>d. No change. There is not sufficient justification at this time to impose more prescriptive requirements or to set specific targets over time. The SPD does support this an overall objective for sustainable transport and would be supportive of a package of appropriate measure in order to achieve this</p> <p>e. No change. This is already supported in paragraph 4.2.31-4.2.37.</p>
6	Environment Agency (EA)	Deborah Simons	<p>a. Need to accurately reflect the NPPF and seek to achieve net gains in biodiversity where possible and promote the preservation, restoration and re-creation of habitats and networks</p> <p>b. Should include improvements to surface water management through the use of sustainable drainage systems</p> <p>c. Disagree that site is not at risk from a 1 in 100 plus climate change flood event.</p>	<p>a. Amend paragraph 1.5.21:</p> <p><i>The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscape, <del>;</del> minimising impacts on biodiversity <b><u>and providing net gains in biodiversity wherever possible;</u></b> and preventing new development from</i></p>

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			<p>Unless EA sees and agree with the modelling for the EcoPark, development will need to compensate for any loss in flood storage.</p> <p>d. EA would normally object to proposed waste activities in Source Protection Zone 1. Developer must undertake investigations (desk and/or intrusive) and aquifers are adequately protected. Advise pre-application discussions.</p> <p>e. Should address how the existing odour issues at site will be managed and where will the waste be re-routed to while works are being carried out.</p> <p>f. The infrastructure to transport waste by water should be designed to not increase flood risk off or on site.</p> <p>g. Support waterside improvements and surface water management subject to:</p> <ul style="list-style-type: none"> <li>o Increasing connectivity between Enfield Ditch and Lee Navigation</li> <li>o Exploring restoration of Enfield Ditch</li> <li>o Exploring opportunities for establishing reedbeds</li> </ul>	<p><i>contributing to, or being put at, an unacceptable risk from levels of soil, air, water or noise pollution or land instability.</i></p> <p>b. Amend paragraph 1.5.24:</p> <p><i>Parts of the Edmonton site are within Flood Zone 2 and 3a, <b><u>and may be vulnerable to surface water flooding.</u></b> The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Core Strategy Policy 28 states that development of sites in the Central Leeside AAP areas that lie within Flood Zones 2 and 3a but which contribute to the strategic objectives for change will be supported in principle. <b><u>In addition, it requires all developments to have Sustainable Drainage Systems (SUDS).</u></b> Development at the EcoPark will need to meet the Sequential <b><u>approach and relevant tests</u></b> and <del>Exception Tests</del></i></p>

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			<p>h. A strategy for maintaining pollution interceptors and also should include other ways to mitigate for odour.</p> <p>i. Drainage diagram should be provided as part of planning application information</p>	<p><i>set out in the NPPF and draft Development Management Document.</i></p> <p>c. Amend paragraph 3.6.7:</p> <p><b><u>Information held by the Environment Agency shows that parts of the site are at risk in the 1 in 100 year plus climate change flood event. However, recent flood modelling has demonstrated that the site is not at risk of flooding during such an event, in the 1 in 100 year plus climate change event although it is predicted to be at risk in the 1 in 1000 year flood event (5). This modelling has not as yet been endorsed by the Environment Agency (EA), and agreement from the EA is required before this modelling can be relied upon to support a planning application. Until which time development will need to compensate for any loss in flood storage.</u></b></p> <p>d. Amend paragraph 4.2.44:</p>

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				<p><b><u>The Environment Agency’s (EA) Groundwater protection: Principles and practice (GP3) document describes how it will manage and protect groundwater. The EA would normally object to proposed waste activities in Source Protection Zone 1. However, it will be the responsibility of any developer to undertake assessments/investigations (desk and/or intrusive) and demonstrate that Any future planning application must be accompanied by a groundwater risk assessment which demonstrates that new facilities do not pose an unacceptable risk to groundwater. <u>Developers are encouraged to seek further advice from the Environment Agency as part of pre-application discussions.</u></u></b></p> <p>e. It is anticipated that future development of the site will be phased, this would mean that parts of the site will still be available to treat waste whilst others are re-developed. However, the North London Waste Authority and the future waste</p>

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				<p>contractor/operator will be responsible for ensuring all of the waste received is managed over the life of the contract, including during any construction/redevelopment periods.</p> <p>Amend paragraph 4.2.46 to address existing issues with odour:</p> <p><i>Waste treatment facilities have the potential to generate odour. Future waste treatment facilities at the site will be enclosed to reduce the impact of odour on the surrounding areas. <b><u>Any existing facilities, if retained, will have to be significantly upgraded, including addressing any odour issues associated with these existing operations.</u></b></i></p> <p>Once the proposals for the site are known as part of a planning application, the Council will be able to consider whether additional and specific odour mitigation is required.</p>

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				<p>f. Amend paragraph 4.2.11:</p> <p><i>The enhancement of the EcoPark wharf to support regular freight movements could involve extension of the wharf, excavation of bays oriented perpendicular or diagonally to the river, and construction of fixed cranes and other lifting and transport apparatus. Such developments should consider carefully the potential visual and ecological impacts from development adjacent to and within the Lee Valley Park and Green Belt context.</i></p> <p><b><u>In addition, any infrastructure required must be designed so it does not increase flood risk off or on site.</u></b></p> <p>g. Amend following paragraphs:</p> <p>Para 4.2.33:</p> <p><i>An integrated long-term landscape and ecological management and maintenance plan should be prepared. This plan should set out the long and short term goals for the soft landscape proposals</i></p>

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				<p><i>associated with the development in the interests of the visual amenity, wildlife and nature conservation of the area, <b><u>including the control of invasive species during construction and over the long term</u></b>. The plan could be treated as a 'living' document to change and adapt as required as the conditions of the site change over time.</i></p> <p>Para 4.2.34:</p> <p><i>As discussed above, a green edge should be created along the eastern boundary adjacent to create a high quality waterside environment along the River Lee Navigation. Future development should also take opportunities along the existing strip of land along the western edge of the site adjacent to Salmon's Brook for ecological enhancement in combination with landscaping and public amenity improvements. This objective could be achieved <b><u>by reprofiling the banks of Salmon's Brook</u></b>, retaining and</i></p>

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				<p><i>enhancing the mature willow planting along the Salmon's Brook edge to improve the western site boundary, creating an ecological link by planting more waterside trees, shrubs and, wild flower grass mixes, and <b><u>marginal vegetation on the reprofiled the banks of Salmon's Brook</u></b><del>reprofiling the banks of Salmon's Brook bank edge.</del></i></p> <p><b><u>Opportunities to establish reed beds in Lee Navigation area should be explored where appropriate.</u></b> <i>The location of any new tree planting should be carefully sited to avoid conflicts with underground utilities and, the safeguarded district heating network routes <b><u>and access for routine and emergency watercourse maintenance.</u></b></i></p> <p>Paragraph 4.2.35:</p> <p><i>Furthermore, there could be increased connectivity between the Enfield ditch and Salmon's Brook. <b><u>Proposals for the restoration of Enfield Ditch should be explored.</u></b> More diversity could be</i></p>

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				<p><i>encouraged through a mowing regime for this strip, possibly in combination with some planting or seeding.</i></p> <p>h. Amend paragraph 4.2.43:</p> <p><i>Due to the underlying aquifer any Sustainable Drainage Systems (SUDs) should be carefully designed to prevent the infiltration to groundwater of any potentially contaminated water. The focus of the SUDs should be predominantly on attenuation, rather than infiltration. If any SUDs take water from areas such as car parks, petrol interceptors should be used before water enters the SUDS system to prevent pollution/contamination impacts.</i>  <b><u>Any interceptors must be appropriately maintained thereafter.</u></b></p> <p>i. Amend paragraph 5.2.6:</p> <p><i>The following information is likely to be required as part of a future planning application. This has been informed by the Council's validation checklist and the</i></p>

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				<p><i>actual information required should be agreed with the Council prior to submission:</i></p> <ul style="list-style-type: none"> <li>• <i>Design and Access Statement</i></li> <li>• <i>Drawings</i></li> <li>• <i>Environmental Statement, including Ecological Report and odour assessment</i></li> <li>• <i>Energy Statement</i></li> <li>• <i>Sustainable Design and Construction Assessment</i></li> <li>• <i>Health Impact Assessment</i></li> <li>• <i>Site Waste Management Plan</i></li> <li>• <i>Transport Assessment</i></li> <li>• <i>Flood Risk Assessment <b><u>(This should be discussed with the Environment Agency, and may require additional information including a drainage diagram)</u></b></i></li> <li>• <i>Tree Survey</i></li> <li>• <i>Demolition Statement</i></li> <li>• <i>Noise Impact Assessment</i></li> <li>• <i>Light Assessment Report</i></li> <li>• <i>Pre-application Consultation Statement</i></li> </ul>

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				<ul style="list-style-type: none"> <li>• <i>Equalities Impact Assessment</i></li> <li>• <i>Appropriate Assessment</i></li> <li>• <i>Groundwater Risk Assessment</i></li> <li>• <i>Construction Management Plan, including Code of Construction Practice</i></li> <li>• <i>BREEAM Pre-assessment</i></li> <li>• <i>Green Procurement Plan</i></li> </ul>
7	FCC Skanska	Alan Bupin	<p>a. Should include reference to commercial and industrial (C&amp;I) waste</p> <p>b. Support the need for initial development around the existing EfW which does not compromise its operation.</p> <p>c. The introduction to the SPD does not give sufficient weight to the waste hierarchy. The site should manage waste as high up the waste hierarchy as possible, with a preference for recycling over ‘other recovery’ (i.e. energy recovery).</p> <p>d. The means by which waste is collected and the delivery arrangements with those who receive material from EcoPark, means that road is and will remain the principle mode serving the EcoPark. Any future transport objectives for the site,</p>	<p>a. Amend paragraph 1.1.1:</p> <p><i>The Edmonton EcoPark site plays a key role in managing the municipal waste <del>produced in north London and</del>, as well as commercial waste, collected by the 7 north London boroughs. <del>†</del><b><u>This Planning Brief has been prepared to guide the future development of the site.</u></b></i></p> <p>b. Noted.</p> <p>c. No change. The SPD supports the continued use of the site for waste management use, and prioritises <b><u>both</u></b> recycling and energy recovery on the Edmonton EcoPark site. Should the existing EfW site (occupying around 3.65ha of a total site area of approx 15ha)</p>

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			<p>such as water transport, must be economically viable. Water transport will at best, if viable, only provide a solution for handling a small portion of the waste. FCC Skanska has evidence that water transport would incur additional costs and land.</p> <p>e. Should reword 1.3.15, 6<sup>th</sup> bullet in 2.1.2, 4.2.1-4.2.14 to include the following or similar text: <i>“minimise local transport impacts, through providing on and off site mitigation as required including maintaining and optimising traffic flows to/from the site outside of the conventional peak hour periods on the local highway network, improving public transport linkages and the use of sustainable transport modes where viable.</i></p> <p>f. Do not support reference to power generated from EcoPark staying within the Upper Lee Valley</p> <p>g. Text should be amended to remove reference to green belt policies applying to the EcoPark site</p> <p>h. Greater detail and clarification on</p>	<p>be redeveloped in the future, the Council will expect an equivalent portion of the site to make provision for an energy recovery facility to help deliver a Decentralised Energy Network. The remainder of the site can be used for other waste management use such as reuse and recycling.</p> <p>The SPD considers the waste hierarchy in the context of the specific opportunities associated with the Edmonton EcoPark site. Decentralised Energy Network Feasibility Studies (2011 and 2012) conclude that it is feasible and viable. In light of this, the SPD specifically prioritises energy recovery. However, recycling is also prioritised in recognition of the need and possibility to apply higher tiers in the waste hierarchy.</p> <p>d. No change. Emerging evidence on the feasibility of transport freight, specifically waste material to and from the Edmonton EcoPark site demonstrates that it is possible to implement such a scheme. In accordance with the London Plan (policy</p>

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			<p>potential flooding issues should be set out, particularly on the sequential test</p> <ul style="list-style-type: none"> <li>i. Air Quality Management Area designation relates to NO2 and PM10 only</li> <li>j. Replace: ‘most advanced waste technologies’ with ‘modern, proven and efficient waste technologies should employed..’</li> <li>k. Delete reference to waste having to be disposed of at the nearest appropriate installation. Can instead refer to Waste Framework Directive</li> <li>l. Reference to catchment area restrictions is unnecessarily restrictive and is at odds with Planning Appeal decisions</li> <li>m. Any development on Plot 1 (EfW) will require a viable, fundable project for the landowner to bring forward revised waste management proposals. Referring to an anticipated timetable could prove to be incorrect and therefore misleading.</li> <li>n. SPD requires a planning application to consider the whole EcoPark site on a comprehensive basis. However, consider that the SPD should provide a strong framework for individual planning</li> </ul>	<p>7.26), Enfield’s adopted Core Strategy (CP 27), and basis of emerging evidence, the SPD highlights the potential of this site and expects future development to take this into account.</p> <ul style="list-style-type: none"> <li>e. Paragraph 1.3.15 recognises the need to address transport issues, the Brief does not include an exhaustive list of measures to minimise transport impacts. These will be addressed in detailed transport assessments for individual planning applications.</li> </ul> <p>The suggested text is too detailed and therefore inappropriate to incorporate within the objectives set out in paragraph 2.1.2.</p> <p>Amend paragraph 4.2.3:</p> <p><i>Any mitigation measures will be developed in response to the detailed proposals for the site. <b><u>These and might include optimising the number of arrivals and departures to and from the site to be outside the peak hours of the</u></b></i></p>

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			<p>application for different parts of the site. FCC Skanska will ensure that Plot 2 proposals fully consider the cumulative effects with the existing (Plot 1) EfW facility across the entire site during the period of time that both schemes operate in tandem, but be able to provide detail on a fully re-developed Plot 1 because this will be unknown.</p>	<p><b><u>local highway network</u></b>, <i>sound traffic management, bulking of materials and water transport.</i></p> <p>f. No change. Paragraph 1.5.14, as stated, reflects text in the Draft Upper Lee Valley Opportunity Area Planning Framework (Nov 2012) – page 92 – which states 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.”</p> <p>g. Amend paragraph 1.5.23:</p> <p><b><u>The NPPF seeks to protect the Green Belt.</u></b> <i>The Green Belt designation adjacent to the site means that relevant policy on Green Belts applies. Policy guidance in the NPPF seeks to prevent urban sprawl by keeping land permanently open. Core Strategy Policy 33 states that the Council will continue to protect and enhance the borough’s Green Belt. The London Borough of Waltham Forest, which also contains Green Belt in the vicinity of the Eco Park, has a similar</i></p>

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				<p><i>policy in the <u>Waltham Forest Local Plan - Core Strategy (adopted March 2012)</u><del>Submission Version Core Strategy (Policy CS6)</del>. Enfield Core Strategy Policy 33 also designates Pickett's Lock Leisure site as a major developed site in the Green Belt to the north of the EcoPark and identifies an opportunity for improvements to the regional sports, recreational and biodiversity offer. <b><u>Future development on the EcoPark site must ensure that adjacent green belt land is not adversely affected.</u></b></i></p> <p>h. Amend paragraph 1.5.24:</p> <p><i>Parts of the Edmonton site are within Flood Zone 2 and 3a, <b><u>and may be vulnerable to surface water flooding.</u></b> The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Core Strategy Policy 28</i></p>

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				<p><i>states that development of sites in the Central Leaside AAP areas that lie within Flood Zones 2 and 3a but which contribute to the strategic objectives for change will be supported in principle. <b><u>In addition, it requires all development to have Sustainable Drainage Systems (SUDS).</u></b> Development at the EcoPark will need to meet the Sequential <b><u>approach and relevant tests</u></b> and <del>Exception Tests</del> set out in the NPPF and draft Development Management Document.</i></p> <p>i. Amend paragraph 3.6.12:</p> <p><i>Whilst situated in Enfield, the EcoPark is also in the vicinity of the LB Waltham Forest and the LB Haringey. All three Boroughs are designated Air Quality Management Areas due to concentrations of annual mean nitrogen dioxide (NO2) and daily mean particulate matter (as PM10 and <del>PM2.5</del>) concentrations breaching air quality objectives. The main source of these in Enfield is road traffic.</i></p>

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				<p>j. No change. If it is not feasible to use an alternative technology the developer can demonstrate why this is the case at the point of submitting a planning application.</p> <p>k. Amend paragraph 4.1.3:</p> <p><i>In accordance with the proximity principle and to contribute towards self sufficiency, any new facilities will be expected to receive waste arisings sourced within an appropriate catchment area. <del>Catchment areas would enable waste to be disposed of in the nearest appropriate installations and therefore</del><b>to</b> reduce the distance travelled. Any catchment areas would be defined to ensure that new waste facilities meet the needs of the local area and could fulfil Local Plan objectives.</i></p> <p>l. It is considered that the brief provides sufficient flexibility on this issue.</p> <p>m. Amend paragraph 5.1.2:  <b><u>The indicative timetable is for the</u></b>  <del>C</del><b>construction</b> of new facilities on Plot 2 will begin in 2014 with operation</p>

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				<p><i>commencing in 2016. <b><u>It is anticipated that the</u></b> EfW on Plot 1 is due to be decommissioned in 2020. Decommissioning <del>will</del><b><u>may</u></b> take approximately two years, following which construction of new facilities might take a further two years.</i></p> <p>n. No change. The SPD requires development to be considered on a comprehensive basis (including both Plot 1 and 2) so that the cumulative form and impact of development can be assessed. The SPD seeks as much detail as possible to be provided as part of a planning application. It is acknowledged that development is likely to be in phases, and it may be that the degree to which future phases/proposals can be anticipated in their detail will vary over the site and over time. In any case, the SPD does establish that the precise scope of an application can be discussed in pre-application discussions and any detailed issues can be considered at this time.</p>

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8	Natural England	David Hammond	<p>a. Support:</p> <ul style="list-style-type: none"> <li>i. screening development due to proximity to Lee Valley Park,</li> <li>ii. Environmental Impact Assessment and need to identify Likely Significant Effects” as part of any planning application</li> <li>iii. Objectives</li> <li>iv. potential for Landscape and Ecology improvements</li> <li>v. Greening and Biodiversity opportunities for the site</li> <li>vi. waterside Improvements</li> </ul> <p>b. No reference to the Lee Valley Management Plan</p> <p>c. The planning application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape</p>	<p>a. Noted</p> <p>b. Noted. The designations covering the Lee Valley Park and the sensitivity of this area are noted in the SPD.</p> <p>c. Noted.</p>

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			<p>assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.</p>	
9	North London Waste Authority (NLWA)	Barbara Herridge	<p>a. Confirm overall support for the SPD, subject to detailed comments (see below)</p> <p>b. <b>Feasibility and viability:</b> SPD policy guidance should take into account issues of feasibility and viability to make sure imposed requirements do not undermine future development of the site</p> <p>c. <b>Decentralised Energy Network (DEN):</b> Concerned that Council’s evidence on DEN, on several grounds, is overly optimistic on the technical and commercial challenges and not robust enough to support the SPD because:</p> <p>i. There is a short payback period (&lt;5 years): if they have to pay to modify the existing EfW to supply the DEN</p>	<p>a. Noted</p> <p>b. No change. SPD elaborates on policies already set out in the adopted Core Strategy and in the London Plan. It does not impose additional policy requirements, it gives additional guidance on how higher level policies will apply and should be implemented on the Edmonton EcoPark site.</p> <p>c. No change. The Council considers that it has sufficient evidence to support the position in the SPD. The Decentralised Energy Network Feasibility Studies (2011 and 2012), taking into account the timing for the decommissioning of the EfW in 2020, conclude that a DEN centred on the Edmonton EcoPark is both feasible and viable.</p>

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			<p>before it is expected to be decommissioned in 2020</p> <p>ii. Report did not model a scenario involving no future EfW (post 2020 decommissioning): There is no certainty that a new energy recovery centre will be delivered post 2020 therefore there is no evidence to give preference for this use above another waste use.</p> <p>iii. No evidence that a search for alternative sites has been undertaken. Locating energy centre on the site would only make sense if it could provide the heat source, it is argued that it might not therefore should not sterilise land within the site specifically for DEN in this way in the meantime.</p> <p>iv. SPD being used to secure land in the absence of a commercial agreement for the heat supply</p> <p>NLWA conclude that requiring the EcoPark to safeguard land for a DEN energy centre and pipe network is not justified by evidence and should not be</p>	<p>Enfield Council, alongside Haringey Council, have made a public commitment to developing a Business Case for Phase I of the DEN; a meeting of Enfield's Cabinet in December 2012 agreed in principle the proposal to establish a Special Purpose Vehicle (SPV) to deliver the Lee Valley Heat Network and to immediately establish a cross borough legal company structure to take forward the development of an energy company for the DEN. The Council is preparing a Business Case for a DEN provide more detail on the commercial viability of DEN.</p> <p>The SPD will be kept under review and amended if necessary in the light of any updates arising from plan preparation, such as the Area Action Plans; and any significant changes to evidence on viability which emerges through a completed Business Case.</p> <p>Once adopted, the SPD would be a material consideration, however the</p>

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			<p>imposed by SPD. SPD should only encourage the delivery of a heat connection, by confirming support for such a development. As DEN forms part of Enfield’s Infrastructure Delivery Plan, it should be funded through Community Infrastructure Levy.</p> <p>d. <b>Future of Plot 1 (EfW):</b> Concerned that SPD will prevent any form of waste treatment on plot of existing EfW which did not generate heat and does not provide other evidence to justify this. The approach restricts the type of waste use to energy recovery, which is near the bottom of the waste hierarchy (reduce, reuse, recycle, other recovery, disposal) - this is contrary to PPS10. Requirements in SPD have significant commercial implications.</p> <p>However, agree that any future proposal for an energy recovery facility, if this is what came forward, should incorporate a connection unless it is not feasible or viable, and at minimum design it to be</p>	<p>applicant could submit further evidence to the Council as part of the submission of a planning application. The applicant could provide a more detailed justification, based on a known proposal, for why they can not achieve the objectives set out in the SPD.</p> <p>d. No change. The SPD supports the continued use of the site for waste management use, and prioritises <u>both</u> recycling and energy recovery on the Edmonton EcoPark site. Should the existing EfW site (occupying around 3.65ha of a total site area of approx 15ha) be redeveloped in the future, the Council will expect future development of this plot or an equivalent portion of the site to make provision for an energy recovery facility to help deliver a Decentralised Energy Network. The remainder of the site can be used for other waste management use such as reuse and recycling.</p> <p>The SPD considers the waste hierarchy in</p>

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			<p>ready for such a connection in the future. The SPD requires an energy-led solution rather than picking the most appropriate form of waste management first. Also, no significant work to model other sites identified as having the potential to supply the DEN or a wider search for alternative sites (i.e. vacant sites/land).</p> <p>e. <b>Potential for water transport</b> should be limited to opportunities which the evidence suggests are technically feasible and economically viable and offer a more sustainable whole system solution than alternatives</p> <p>f. <b>Design quality</b> expectations should be proportionate and reasonable, and not impose significant financial penalties if they do not contribute towards waste management. SPD should clarify which design aspects are of greatest importance, it is suggested that design should prioritise the following: providing a layout which allows for safe and efficient operation, appropriate control of</p>	<p>the context of the specific opportunities associated the Edmonton EcoPark site. Decentralised Energy Network Feasibility Studies (2011 and 2012) conclude that it is feasible and viable. In light of this, the SPD specifically prioritises energy recovery. However, recycling is also prioritised in recognition of the need and possibility to apply higher tiers in the waste hierarchy.</p> <p>e. No change. Emerging evidence on the feasibility of transport freight, specifically waste material to and from the Edmonton EcoPark site demonstrates that it is possible to implement such a scheme. In accordance with the London Plan (policy 7.26), Enfield’s adopted Core Strategy (CP 27), and basis of emerging evidence, the SPD highlights the potential of this site and expects future development to take this into account.</p> <p>f. Good design needs to be embraced as a concept of the ‘whole’ rather than a sum of individual constituent parts. SPD</p>

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			<p>emissions to air, water land, efficient use of resources, and massing.</p> <p>Concerned that meeting the Excellent or Outstanding BREEAM standard will be very challenging and potentially would add to the cost burden. BREAAM may not be the best standard to apply, given the complexities and bespoke nature of major waste facilities. Therefore there is a need for flexibility in applying these standards.</p> <p>g. <b>Requirement for whole site proposals:</b> Delete paragraph which requires the planning application to be comprehensive (cover the cumulative form and impact of development across the whole site) and as detailed as possible, will the Council rejecting applications which do not do this. Alternatively, NLWA will accept the paragraph being amended so that there is a clear acceptance that development will come forward in discrete stages and that separate planning applications for different parts of the site will be determined even where there is no</p>	<p>elaborates on policies already set out in the adopted Core Strategy and in the London Plan. These policies include a degree a flexibility and the SPD reflects this position. However, SPD could also refer to equivalent alternative environmental assessment methods, instead of just referring to BREEAM.</p> <p>Amend paragraph 4.2.49:</p> <p><del>Additionally, Draft Policy DMD-4 requires proposals involving the major refurbishment or creation of new non-residential floorspace exceeding 1000m<sup>2</sup> to achieve the following standards under the relevant BREEAM 2011 scheme (or equivalent rating/scheme if this is replaced or updated) as a minimum, subject to feasibility and viability testing:</del></p> <p>g. No change. The SPD requires development to be considered on a comprehensive basis (including both Plot 1 and 2) so that the cumulative form and</p>

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			<p>certainty on the future of the rest of the site. This position can be supported by the more reasonable requirement that a proposed development must not prejudice the delivery of future development elsewhere on the site.</p> <p>h. <b>Planning Obligations:</b> Concerned with requirements relating to DEN (due to reasons above), requirement for local employment and training should be clarified and s106 agreements should not be used to secure a general contribution towards infrastructure in the borough – they should only focus on site specific mitigation</p>	<p>impact of development can be assessed. The SPD seeks as much detail as possible to be provided as part of a planning application. It is acknowledged that development is likely to be in phases, and it may be that the degree to which future phases/proposals can be anticipated in their detail will vary over the site and over time. In any case, the SPD does establish that the precise scope of an application can be discussed in pre-application discussions and any detailed issues can be considered at this time.</p> <p>h. Amend paragraph 5.3.7:</p> <p><i>Additional obligations to secure any on-site measures required to make the development acceptable in planning terms, and necessary off site mitigation measures might include:</i></p> <ul style="list-style-type: none"> <li>• <del>measures to minimise traffic generation</del> <b><u>mitigation measures associated with the outcome of the Transport Assessment</u></b></li> <li>• <i>a commitment to provide heat to the Lee</i></li> </ul>

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				<p><i>Valley Heat Network</i></p> <ul style="list-style-type: none"> <li>• <i>a commitment to safeguard space for the energy centre and pipe routes from the site</i></li> <li>• <i>mitigation measures associated with the outcome of any Environmental Impact Assessment</i></li> <li>• <i>mitigation measures associated with the outcome of any Transport Assessment</i></li> <li>• <i>landscape strategy</i></li> <li>• <i>measures that ensure the development maintains access to the Lee Navigation for waterborne transport</i></li> <li>• <del><i>employment and training of local people</i></del> <b><i>supporting business and employment initiatives, including Local labour initiatives such as local labour in construction; employment skills training; apprenticeships; and job brokerage.</i></b></li> </ul> <p>Amend paragraph 5.3.9 to clarify use of s106:  <i>If the CIL charging schedule is not in place at the time the planning application</i></p>

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				<i>is determined, a Section 106 Agreement will <b>continue to be used to ensure the provision of necessary infrastructure as well as a means to secure any required mitigation measures required.</b></i>
10	Resident	Martin Drake	<p>a. Six weeks consultation is not long enough to ensure a reasoned consideration of the issues by the public. A public presentation within consultation period would have aided the debate. Any decision on the proposed future of the Eco park should be based on a wider debate, and in the interim the Council should only come to a provisional position taking into account comments made so far and commit to further consultation</p> <p>b. The proposal appears to be centred on the idea of continuing with waste incineration but with an additional local heating scheme. It is not clear that all options have been considered for the facility (especially re-use), and that the costs and benefits of these have been evaluated.</p> <p>c. The proposed scheme intends to operate to 'regulatory requirements for health and</p>	<p>a. Minimum legal requirements for consulting on a SPD is 4 weeks. The consultation on the SPD was publicised in the Our Enfield magazine and on the Council's website. All of the contacts on Enfield's Local Plan database were notified (approximately 1500 individuals and organisations). Copies of the document were available online, at the Civic Centre and in all local libraries.</p> <p>b. The SPD supports the continued use of the site for waste management use, and prioritises <u>both</u> recycling and energy recovery on the Edmonton EcoPark site. Should the existing EfW site (occupying around 3.65ha of a total site area of approx 15ha) be redeveloped in the future, the Council will expect this portion of the site to make provision for an energy recovery facility to help deliver a</p>

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			<p>safety, air quality and environmental protection'. When considering the options for the site, the impacts on these aspects needs to be specified as well as their economic and cultural implications. I feel proposals for new facilities should be committed to improve on current performance related to these aspects rather than match them, and that such a commitment should be part of the objectives for the site.</p>	<p>Decentralised Energy Network. The remainder of the site can be used for other waste management use such as reuse and recycling.</p> <p>Edmonton EcoPark is one site within a wider network of waste sites across north London which managing, principally, municipal waste through reuse, recycling, energy recovery and disposal.</p> <p>c. Planning can be complementary to, but does not replace other regulatory regimes. Air quality, Noise and Odour is covered by SPD. A new paragraph on health has been inserted:</p> <p>New paragraph 4.2.41:</p> <p><b><u>The potential for health impacts will be assessed as part of the planning application; it is at this stage that the developer will submit details of and specify development proposals for the site. Developers submitting planning applications for major</u></b></p>

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				<p><b><u>developments must provide a Health Impact Assessment (HIA) in accordance with the Mayor's policy in the London Plan (Policy 3.2). The HIA will ensure that the impacts of the development proposal on the health and wellbeing of local communities are assessed in the planning application. Separate Environmental Impact Assessments (EIA), will be used to assess the nature of the operations in relation to the likely impacts this would have on the environment; and ways in which negative impacts can be reduced.</u></b></p>
11	Waltham Forest Council		<p>a. Generally supports the development objectives for the site</p> <p>b. SPD needs to be amended to take account of likely cross-boundary impacts – in particular, the implications for securing sustainable management of the borough's own waste.</p> <p>c. It has a crucial role in helping to meet the apportionment requirements for the North London boroughs including Waltham Forest.</p>	<p>a. Noted</p> <p>b. Noted. Adjoining authorities will be consulted on any future planning applications for the site.</p> <p>c. Noted</p> <p>d. Lifetime of SPD is anticipated to be relatively short term focusing on the assessment and construction of new</p>

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			<p>d. Given the lifetime of the SPD, it necessary to incorporate greater flexibility in approach. The role of the document should be clearer - whether it provides general guidance or is intended to provide specific fixed criteria to assess development proposals.</p> <p>e. Greater focus should be placed on the waste hierarchy as a whole rather than specific reference to individual tiers of the waste hierarchy. Paragraph 4.1.9 in particular, may restrict the site to a waste management process which is near the bottom of the waste hierarchy.</p> <p>f. Support principle of Decentralised Energy (DEN) on this site. It is noted that the delivery of a DEN is a major theme in the SPD. It is therefore necessary to ensure that safeguards are in place to deliver this within the context of the primary use of the site for waste.</p> <p>g. SPD focuses on an energy-led solution for future development on Plot 1. The most appropriate form of waste management should be considered and then balanced with the requirements for</p>	<p>facilities anticipated to start in 2016. The SPD elaborates on policies in adopted Core Strategy and London Plan, which are long term strategic documents, and as this is the case, should be robust to change.</p> <p>In any case, the SPD will be kept under review and amended if necessary in the light of any significant change in circumstance.</p> <p>e. The SPD supports the continued use of the site for waste management use, and prioritises <u>both</u> recycling and energy recovery on the Edmonton EcoPark site. Should the existing EfW site (occupying around 3.65ha of a total site area of approx 15ha) be redeveloped in the future, the Council will expect this portion of the site to make provision for an energy recovery facility to help deliver a Decentralised Energy Network. The remainder of the site can be used for other waste management use such as reuse and recycling.</p> <p>Edmonton EcoPark is one site within a</p>

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			<p>energy generation.</p> <p>h. The requirement to provide a heat source for a future DEN should be conditional on there being a proposal for an energy recovery facility which will generate a surplus of heat and on the feasibility and viability of such a DEN connection.</p> <p>i. Support opportunities for water based transport, however this should be limited to opportunities where from evidence this is feasible and viable.</p> <p>j. Need to amend references to Waltham Forest Local Plan and green belt policies</p> <p>k. There is likely to be adverse cumulative implications by 2031 arising from growth and the general increase in vehicle trips. Note the requirement for the submission of a transport impact assessment.</p> <p>l. Clarification is required regarding the removal of the stack, retention or replacement and therefore the general design standards that will apply.</p>	<p>wider network of waste sites across north London which managing, principally, municipal waste through reuse, recycling, energy recovery and disposal.</p> <p>f/g/h. The SPD supports the continued use of the site for waste management use, and prioritises both recycling and energy recovery on the Edmonton EcoPark site. Should the existing EfW site (occupying around 3.65ha of a total site area of approx 15ha) be redeveloped in the future, the Council will expect this portion of the site to make provision for an energy recovery facility to help deliver a Decentralised Energy Network. The remainder of the site can be used for other waste management use such as reuse and recycling. Notwithstanding, that the requirements for the DEN, would be associated with and contribute towards waste management i.e. they involve energy recovery from waste; but it is also considered that, as it would not require land take of the whole site, it should not therefore should not</p>

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				<p>undermine the site functioning effectively and efficiently as a waste site.</p> <p>i. No change. Emerging evidence on the feasibility of transport freight, specifically waste material to and from the Edmonton EcoPark site demonstrates that it is possible to implement such a scheme. In accordance with the London Plan (policy 7.26), Enfield’s adopted Core Strategy (CP 27), and basis of emerging evidence, the SPD highlights the potential of this site and expects future development to take this into account.</p> <p>j. Amend paragraph 1.5.23:  <b><u>The NPPF seeks to protect the Green Belt.</u></b> <del>The Green Belt designation adjacent to the site means that relevant policy on Green Belts applies. Policy guidance in the NPPF seeks to prevent urban sprawl by keeping land permanently open. Core Strategy Policy 33 states that the Council will continue to protect and enhance the borough’s Green Belt. The London Borough of Waltham Forest, which also contains Green Belt in the vicinity of the Eco Park, has a similar</del></p>

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				<p><i>policy in the <u>Waltham Forest Local Plan - Core Strategy (adopted March 2012)</u><del>Submission Version Core Strategy (Policy CS6)</del>. Enfield Core Strategy Policy 33 also designates Pickett's Lock Leisure site as a major developed site in the Green Belt to the north of the EcoPark and identifies an opportunity for improvements to the regional sports, recreational and biodiversity offer. <b><u>Future development on the EcoPark site must ensure that adjacent green belt land is not adversely affected.</u></b></i></p> <p>k. Noted l. The SPD anticipates the existing incinerator will be decommissioned from 2020, and that it this area of land becomes available for development thereafter, If it is developed, the Council would expect to see a energy recovery use and such a use would require a stack.</p>
12	Greater London Authority		a. SPD reiterates commitments made in the Upper Lee Valley Opportunity Area	a. Noted b. Noted.

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	(GLA)/Transport for London (TfL)		<p>Planning Framework (ULVOAPF) which:</p> <ul style="list-style-type: none"> <li>i. supports the use and protection of the EcoPark for waste management.</li> <li>ii. Expects more efficient and greener methods of dealing with waste, including the Lee Valley Heat Network, and the provision for an energy centre that has the ability to operate top up and standby steam boilers.</li> </ul> <p>b. SPD is not technology specific in accordance with strategic guidance. Preferred solutions would be expected to focus on the carbon intensity of waste and achieving the highest carbon savings.</p> <p>c. Site is crucial in terms of heat supply potential and will support the Mayor's decentralised targets. CHP solutions must be considered as part of any proposals – power only solutions with no heat off take provision are not acceptable.</p> <p>d. Approach taken in relation to design, and in particular massing is appropriate. Any future proposals would be expected to</p>	<ul style="list-style-type: none"> <li>c. Noted.</li> <li>d. Agreed. Amend Design section in chapter 4 to refer to London Plan requirements.</li> <li>e. Agreed. Amend Design section in chapter 4 to refer to London Plan requirements.</li> <li>f. Noted</li> <li>g. Noted</li> <li>h. Amend sub heading above paragraph 4.2.41 – replace 'Pollution' with 'Environmental impacts and health'. Amend paragraph 4.2.45:</li> </ul> <p><i><del>In accordance with draft Policy DMD 64</del> Development at the EcoPark should take a holistic approach to minimise the air quality impacts, including the construction, design and ongoing operations, by the use of advanced modern waste technologies, promoting sustainable design and construction, sustainable transport modes and alternative fuels. <b><u>Development must be designed to comply with all the relevant environmental regulations and standards and with regard to best practice and other national guidance,</u></b></i></p>

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			<p>demonstrate additional design requirements and impact assessments for tall and large scale buildings. Given the proximity to the adjacent Lee Valley Regional Park, any future designs would be expected to ensure the building sits within its context and any adverse impact is mitigated.</p> <p>e. Highest standards of accessibility and inclusion need to be achieved and demonstrated through a design and access statement.</p> <p>f. Support the mitigation of noise impacts across the site, particularly along the eastern boundary; the green edge; and biodiversity and habitat enhancements. It is expected that this would be secured as planning obligations.</p> <p>g. Appropriate mention of sustainable design and construction and climate change mitigation measures. Future applications will be expected to incorporate such measures.</p> <p>h. In relation to air quality, need to reference:</p> <p style="padding-left: 40px;">i. EA standards</p>	<p><b><u>set by relevant agencies such as the Environment Agency. The Greater London Authority (GLA) will be publishing Sustainable Design and Construction Supplementary Planning Guidance, which will include biomass emission standards, and a Construction and Demolition SPG in order to help minimise impacts on air quality in London.</u></b></p> <p>Insert new paragraph above paragraph 4.2.41:</p> <p><b><u>The potential for health impacts will be assessed as part of the planning application; it is at this stage that the developer will submit details of and specify development proposals for the site. Developers submitting planning applications for major developments must provide a Health Impact Assessment (HIA) in accordance with the Mayor’s policy in the London Plan (Policy 3.2). The HIA will ensure that the impacts of the development</u></b></p>

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			<ul style="list-style-type: none"> <li>ii. Biomass emissions standards to be published as part of emerging Sustainable Design and Construction SPG</li> <li>iii. Health Protection Agency national guidance on air quality and human health in respect of municipal waste facilities</li> <li>iv. Construction and demolition SPG</li> </ul> <p>TfL comments:</p> <ul style="list-style-type: none"> <li>i. Background traffic surveys undertaken to support SPD are not comprehensive overall transport assessment for development on the site, but acknowledge that data has informed strategic assumptions related to land use quantum, waste throughput and traffic generation.</li> <li>j. Welcome the emphasis the brief places on the need to mitigate the impact of any development on the road network, to be demonstrated through a full Transport Assessment (TA).</li> <li>k. TA will be expected to validate the</li> </ul>	<p><b><u>proposal on the health and wellbeing of local communities are assessed in the planning application. Separate Environmental Impact Assessments (EIA), will be used to assess the nature of the operations in relation to the likely impacts this would have on the environment; and ways in which negative impacts can be reduced.</u></b></p> <ul style="list-style-type: none"> <li>i. Noted, but strategic assumptions have not informed potential land use quantum.</li> <li>j. Noted</li> <li>k/l. Amend paragraph 5.2.8 to include Transport for London:</li> <li>m/n. The information provided as part of the Transport Assessment will be used to secure and agree appropriate mitigation, including the consideration of routing, bulking and sustainable transport modes. Paragraphs 5.2.7 - 5.2.8 have been amended to clarify some of information requirements: <i>The Transport Assessment should</i></li> </ul>

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			<p>assumptions made at paragraph 4.2.1 that future traffic generation is likely to be negligible. Until full TA undertaken, TfL is not in position to endorse this statement. May require an appropriate degree of traffic modelling or further junction assessment to be agreed with TfL and Enfield Council, in advance of a planning application being submitted. Request that paragraph 5.2.8 is amended to endure scope of TA is agreed with TfL in addition to Enfield Council and paragraph 5.2.7 amended to include details of delivery, servicing and construction arrangement.</p> <p>l. Given close proximity to Meridian Water masterplan area and shared reliance on North Circular Road, recommend more localised assessment of the cumulative impact of the Meridian Water and Edmonton EcoPark development is carried out. This requirement should be embedded into the planning brief. TfL, North London Highway Assignment Model and latest version of Railplan should be used.</p> <p>m. Management of vehicles associated with</p>	<p>follow <b><u>the latest</u></b> Transport for London (TfL) Best Practice Guidance (<b><u>currently 2010</u></b>), <b><u>although the full scope must be discussed and agreed with the Council's Transport Officers and Transport for London (TfL) prior to submission. As a minimum it should include:</u></b> and include the following:</p> <ul style="list-style-type: none"> <li>• <b><u>Understanding of bBaseline conditions of the local and wider highway network:</u></b></li> <li>• <b><u>Expected t</u></b> Trip generation, distribution and modal share;</li> <li>• <b><u>Analysis of the impact on the road network, cycle and pedestrian routes, and the public transport network. As a minimum t</u></b> This should include peak hour capacity analysis of the following junctions: Fore Street, Cook's Ferry Roundabout, Great Cambridge and Montagu Street/Conduit Way;</li> <li>• <b><u>Analysis of cumulative impact arising from other committed developments in the area, having particular regard to the</u></b></li> </ul>

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			<p>the construction and operation of the EcoPark should be considered from the outset.</p> <p>n. Design of development should adopt best practice to ensure the logistics of transport movements connected with the site are as sustainable as possible, including the routing of vehicles and bulking and transportation of materials by non road based modes.</p> <p>o. May benefit from referencing Freight Operators Recognition Scheme (FORS), the Freight Quality Partnerships, and designing in best practice in terms of freight, delivery and servicing movements.</p> <p>p. Expect planning permission to set requirements for construction and logistics plans (CLPs) and delivery and servicing plans (DSPs) as necessary</p> <p>q. Agree with water based transport as part of mitigation strategy and because it is supported by London Plan and OAPF. Keen to ensure transportation of freight by water is considered at earliest design stage and expects the existing wharf to</p>	<p><b><u>growth forecast at Meridian Water, and a localised assessment of the impact of these developments on the A406.</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Mitigation and planning obligations; (S106) and</u></b></li> <li>• <b><u>Travel Plan, Delivery and Servicing Plans (DSPS), and Construction Logistics Plans (CLP)</u></b></li> <li>• <b><u>Parking and cycle provision</u></b></li> </ul> <p><del>The scope of the Transport Assessment must be discussed and agreed with the Council's Transport Officers. The Transport Assessment should take into account the cumulative impact arising from other committed developments in the area, having particular regard to the growth forecast at Meridian Water.</del></p> <p>o. Insert new paragraph after 4.2.14:</p> <p><b><u>Developers should have regard to best practice in terms of freight, delivery and servicing movements, and have regard to the Freight Operators</u></b></p>

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			<p>be safeguarded through development.</p> <p>r. There is no mention of vehicle parking and reference to London Plan parking standards. Full justification for the level of proposed parking provision will be expected in the TA, including details of electric charging points, accessible parking bays, car parking for visitors/educational visits, and if appropriate, coach parking.</p> <p>s. Should enhance infrastructure for pedestrians and cyclists in vicinity of the site and welcome emphasis on this in paragraph 4.2.14. Links to Angel Road station are particularly deficient.</p> <p>t. Appropriate levels of cycle parking and associated facilities will be expected to be provided and this requirement should be reflected in the SPD.</p> <p>u. May be useful to mention the emerging Development Infrastructure Funding Study (DIFS).</p>	<p><b><u>Recognition Scheme (FORS), and Freight Quality Partnerships.</u></b></p> <p>p. Paragraph 5.2.8 amended (see above)</p> <p>q. Amend paragraph 4.2.6:</p> <p><i>The Edmonton EcoPark site offers a very unique opportunity; its close proximity to the River Lee Navigation and access to a wharf means that there is significant potential for this site to make use of water based transport. Waste is a transport intensive use, therefore the all development proposals should seek to make use of water transport to reduce the number of vehicle trips and therefore minimise the negative environmental impacts of road based transport. <b><u>Future development safeguards the wharf area so that a Freight by Water scheme can be implemented or to ensure its future delivery is not prejudiced.</u></b></i></p> <p>r. Paragraph 5.2.7 amended (see above)</p> <p>s. Amend paragraph 4.2.14 to include provision of cycle and walking:</p>

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				<p><i>Development should also seek to complement wider connectivity improvements <del>These</del> which might include improvements to east-west routes, improving and enhancing the design of pedestrian route under the North Circular Road to Meridian Water, <b><u>contributions to help advance Greenway cycle networks</u></b>, and improving pedestrian links to Angel Road Station as illustrated on Figure 4.4 'Connectivity Enhancements' below.</i></p> <p><b><i>Developers should also consider opportunities to improve the local greenway network.</i></b></p> <p>t. Paragraph 5.2.7 amended (see above) u. Noted</p>
13	Haringey Council		<p>a. Support/welcome:</p> <ul style="list-style-type: none"> <li>i. Positive design led brief</li> <li>ii. Retention of Edmonton as a site available for waste management use and to enable waste as far up the waste hierarchy as possible</li> </ul>	Noted. No change.

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			<ul style="list-style-type: none"> <li>iii. Emphasis on sustainable development and carbon reduction</li> <li>iv. Continuing the work on the Upper Lee Valley Heat Network and the recommendations in the Decentralised Energy Network Feasibility Study.</li> <li>v. Use of the waterway for transport</li> <li>vi. Potential for improvement to the local environment in terms of visual amenity, biodiversity and Lee Valley corridor.</li> </ul>	
N/A	Other changes		Update references to DMD policies	
N/A	Other changes		3.6.24	<p><i>The Council is developing a Greenway network providing easily <u>accessible</u> and continuous cycle routes <b>within</b> the Borough. One <b>potential option is to <u>provide a</u></b> <del>of the Greenways will <u>running</u></del> <b><u>to along the</u></b> southern <b>boundary</b> of the EcoPark <b><u>next to</u></b> <del>along</del> Advent Way.</i></p>

