

1. APPLICATION DETAILS

Reference No: Our ref:HGY/2015/3433 Ward: Not Applicable - Outside Borough
your ref [NLHP-SP034](#)

Address: Edmonton EcoPark N18 3AG

Proposal: North London Heat and Power Project (Application Reference Number:
EN010071)

Applicant: North London Waste Authority

Ownership: NLWA

Case Officer Contact: Emma Williamson

Site Visit Date: N/A

Date received: 20/11/15

1 PROPOSED DEVELOPMENT AND LOCATION DETAILS

1.1 Proposed development

This is a National Infrastructure Project Development Consent Order Application. The North London Heat and Power Project would comprise of an energy recovery facility (ERF) using waste as fuel and capable of an electrical output of approximately 70 megawatts together with heat output of approximately 35 MW. The proposal has the potential to supply heat to the Lee Valley Heat Network (LVHN) or additional or alternative heat networks. As the Project would generate energy over 50 MW it is classified as a Nationally Significant Infrastructure Project under the Planning Act 2008.

1.2 Site and Surroundings

The site is located within the Upper Lee Valley Opportunity area and lies to the north of the A406 from London Borough of Haringey which as the crow flies is approximately 1km away at its nearest point.

The site currently comprises a waste processing facility including an energy from waste incinerator, a composting facility, bulky waste and recycling facilities and Enfield's refuse vehicle depot.

The site is accessed from Advent Way which leads to the A406 North Circular.

2. Impacts on Haringey

2.1 The main issues affecting Haringey raised by the proposed development are:

1. Principle of the development
2. The suitability of the proposal for supply of heat
3. Safeguarding for future needs
4. Air quality and transport impacts of the development
5. Employment and training provisions in the Section 106 Agreement

Principle of the development

2.2 In strategic terms the proposal is supported given its potential to increase the move towards waste self-sufficiency and its role in meeting the waste apportionment of the North London Boroughs together with the potential for the generation of electricity and in particular low carbon heat. Haringey has a number of development sites in North Tottenham which are expected to deliver in excess of 5,000 new dwellings and would potentially benefit from the provision of low carbon heat. The site is currently safeguarded for waste use and the continuation of this use is welcomed.

2.3 Notwithstanding support in principle and given the pressure on waste management sites in North London as evidenced through the ongoing development of the Joint North London Waste Local Plan, the application should demonstrate more fully how waste capacity within the site, during and following construction, can be maximised (recognising the phasing of the project) in order to avoid displacing existing on site waste management and treatment capacity and to reduce pressure for additional off site treatment and waste management capability to support implementation of the project.

The suitability of the proposal for supply of heat

2.4 The Upper Lea Valley Opportunity Area Framework sets out that Edmonton Eco Park is the unique opportunity for a sustainable heat network, delivering cost-competitive, low to zero carbon energy, and the preferred location for the supply hub for the Lea Valley Heat Network. Details of the Council's borough wide heat mapping and Decentralised Energy Policies can be found on our website. In this context the application is supported. It is understood that the plant is designed to be 'heat ready' and that corridors for the laying of pipes to the edge of the site are safeguarded as part of the application. Spatial plans for significant

growth identify land (in Haringey) to the south of the North Circular. These development sites fall within areas where development viability associated with significant public sector infrastructure costs (and the needs of affordable housing) serves to potentially undermine the achievement of strategic and local planning objectives for local heat networks. Haringey Council therefore considers that the applicant should go a step further than currently advocated in the application and should provide a connection to the boundary of the site and also to a point to the south of the A406. Failure to secure such a commitment will otherwise be a significant, and potentially prohibitive, cost for future operators and may act as a significant logistical and financial barrier to connection for any future community heat network development proposals within Haringey.

Safeguarding for future needs

- 2.4 It is appreciated that there is a balance between electricity and heat generation. It is understood that the GLA are in ongoing discussions with NLWA to optimise this balance. The application should be conditioned such that at detailed design an Energy Strategy should be submitted to the Local Planning Authority for approval in consultation with neighbouring boroughs and GLA. This should set out the opportunities for heat in the local area and show how the energy from waste plant could deliver an optimal balance between energy and heat in order to serve these heat needs. The Strategy would include back up boilers and associated space and pump networks required to support community networks, show the carbon intensity for the heat, the turbine specification, and a technical appraisal of the assessment of the heat off take options.
- 2.5 The Section 106 agreement should accordingly make provision for, and recognise the ways in which the roll out of heat networks in the locality may be by way of, more than one provider rather than solely through the Lee Valley Heat Network. This will ensure that the ability of the plant to play a strategic role in supporting low carbon outcomes can be optimised with the diverse development programmes across North London.

Air Quality and Transport impacts of the development

- 2.6 The impact of the chimney emissions from incinerating waste needs to be carefully considered having regard to the aspiration to improve significantly upon existing air quality within the area. Haringey Council notes that the proposal, as set out in Volume 2 and Section 2 of the ES, will mitigate nitrogen oxide emissions via a flu gas cleaning system and (subject to appropriate management and maintenance of that capability) that there will not be any adverse impact on Haringey residents. Given the transport information

submitted it is also not considered that there will be a long term adverse impact on Haringey. It is requested that Haringey Council are consulted on the Construction Management Plan for the proposal in so far as it is proposed for vehicles to travel through Haringey.

Employment and Training Provisions in the Section 106 agreement

- 2.7 Given the scale of the project Haringey Council consider that provision should be made for providing opportunities for local employment in both the construction and operation of the facility, including a commitment to a level of apprentices and a partnership process with local boroughs for recruitment. Our understanding is that is the intention to incorporate such clauses in a future iteration of the Section 106 agreement, which is welcomed, and Haringey Council looks forward to discussion on these clauses. Alternatively the Section 106 agreement refers to an obligation to submit and Employment Strategy for agreement by Enfield Council, this clause could be expanded to add that consideration of the strategy will be in consultation with adjoining boroughs.

Conclusion

- 2.8 In strategic terms this proposal, on a safeguarded waste site, and subject to the provisions set out in 2.3 above is supported given its potential to increase the move towards waste self-sufficiency and its role in meeting the waste apportionment of the North London Boroughs together with the potential for the generation of electricity and in particular low carbon heat.
- 2.9 Haringey Council nevertheless considers that to provide the best chance for take up of the heat network opportunity and given the exceptional site characteristics (and barrier) posed by the North Circular Road, the applicant should be required to lay the heat network connection pipes to the boundary of the site and also to a connection point to the south of the A406 (where the majority of future growth is planned) given that this will otherwise be a significant, and potentially prohibitive, management and implementation cost for the future network operators (or individual site developers) to bear.
- 2.10 The application should be conditioned such that at detailed design an Energy Strategy should be submitted to the Local Planning Authority for approval in consultation with neighbouring boroughs and GLA.
- 2.11 The Section 106 agreement should reflect the potential for heat to be provided to networks other than the preferred provider (Lee Valley Heat Network). To

ensure that the proposals do not prevent a range of future delivery options to come forward in the area.

- 2.12 Given the scale and reach of the project Haringey Council consider that provision should be made within the S106 for providing opportunities for local employment in both the construction and operation of the facility, including a commitment to a level of apprentices and a partnership process with local boroughs including Haringey for recruitment.