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Subject: Continuing Objection to Award of DCO to North London Waste Authority
Date: 06 July 2016 07:20:32

Dear Sir/Madam,

Thank you for inviting my company to yesterday's hearing on the award of DCO to the proposed North London Heat & Power Project.

As representor 10031920, yesterday I voiced strong objection before the Inspector, Paul Hudson, to the succession of hearings on the award of DCO to North London Waste Authority which subverts EU planning procedure which normally leads to public examination of the North London Waste Plan by an independent Inspector in 2017.

North London Waste Authority, a waste disposal (not planning) authority, proposes a large-scale incinerator on the Edmonton Eco-Park site to replace the existing incinerator erected around 1970 which operated successfully, at much reduced capacity, after lengthy modifications to extend boiler life. Waste planning policies and regulations 46 years later are markedly different with a replacement incinerator *per se* not legally compliant.

1. Dclg has confirmed to KTI Energy Limited that a replacement unit must comply with the following policies:-

- * s.97 of National Planning Policy Framework 2012 by which a power generator fired by solid fuel should mitigate climate change amongst the community it serves with low carbon electricity and heat;
- * s.4 of National Planning Policy for Waste 2014 by which a power generator fired by solid fuel should promote sustainable property development amongst the community it serves.

2. The representation from KTI Energy Limited has already placed before the North London Waste Plan is for the development of two community-led renewable CHP schemes, each fired by a combination of waste and virgin biomass fuel, to serve communities within the following London boroughs:-

- * the first to serve communities in Enfield, Haringey, Waltham Forest and Hackney;
- * the second to serve communities in Barnet, Camden and Islington.

3. On the basis of probability, which examination of the North London Waste Plan will confirm, the following may be made to hold:-

- * the first renewable CHP scheme should be located on a 6 hectare site on or around the Edmonton Eco-Park;
- * the second renewable CHP scheme should be located on a 6 hectare site on or around Brent Cross.

4. On the basis of probability entered into 3) above, neither location should be licensed to receive crude waste for material recovery and fuel recovery. The Ferrybridge renewable CHP schemes confirm these configurations are not unique in the UK.

5. An innovation introduced by KTI Energy Limited is that each renewable CHP scheme should comply with s.38 of Infrastructure Act 2015 by which the two communities have a Community Electricity Right to a shareholding. That Community Electricity Right should embrace a Community Heat Right where a district heating network extending from each CHP station makes it economically possible.

6. Past negotiations had by KTI Energy Limited with London boroughs of Enfield and Haringey have already confirmed their planned district heating networks, when connected to a CHP station on or around Edmonton EcoPark, could provide low carbon heat to at least 16,000 new properties, alongside additional new employment premises. When existing premises are included, this community-led renewable CHP scheme should be capable of attaining R1 energy efficiency status. Innovative thinking on providing appropriate infrastructure to Locally-led Garden Cities will apply.

7. Our negotiations with London borough of Barnet ceased several years ago when North London Waste Authority sullied discussion by identifying a small site adjacent to the proposed Hammerson property development unfit for CHP purpose. Those negotiations need to be resurrected by a Project Delivery Team skilled in the development of community-led renewable CHP schemes at a scale similar to *Stadtwerke* in Germany.

8. The task which North London Waste Authority is asked to perform by KTI Energy Limited under the North London Waste Plan is to develop four sites where household, C&I and C&D waste may be subjected to material recovery followed by SRF and woodchip recovery for delivery to either of the two community-led renewable CHP schemes. Assuming each CHP scheme will require 460,000 t/a fuel, the scale of those four waste processing plants should be capable of receiving total 1,840,000 t/a unprocessed waste for material and fuel recovery. Several suitable sites for purely waste recycling and processing are already identified in the emerging North London Waste Plan. Several non-household waste contractors in North London are already engaged in the business but unfortunately forced to export their fuel product to mainland Europe.

9. The award of a DCO to a large scale incinerator on the Edmonton Eco-Park site, without commitment from North London Waste Authority to integrate under single management an appropriate scale of heat house and district heating main serving London boroughs of Enfield, Haringey, Waltham Forest and Hackney, could prejudice compliance of the North London Waste Plan with those Government policies which became the law of the land by February 2015. Furthermore, by mindlessly incinerating household waste delivered by London boroughs for its disposal, instead of recovering material and fuel as proposed by KTI Energy Limited, the award of DCO could seriously diminish the likelihood of compliant community-led renewable CHP schemes mitigating climate change in North London.

10. The plea entered by KTI Energy Limited is that the award of DCO to North London Waste Authority is placed on the back-burner until the North London Waste Plan is published and its content examined in public by an Inspector to be appointed by the Communities Secretary. That plea was expressed verbally to

Paul Hudson at yesterday's hearing.

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