

**From:** [James Stewart-Irvine](#)  
**To:** [North London HPP](#)  
**Subject:** Biffa Waste Services - Further Representations  
**Date:** 20 July 2016 09:26:36  
**Attachments:** [image001.png](#)  
[160719 Biffa Response to NLWA EcoPark Consultation - Final Representations.pdf](#)

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Dear Sirs

Please find attached a further representation on behalf of Biffa Waste Services Ltd. As set out in the letter, further discussions have taken place with the Applicant who have responded to the Examiner's request to amend the CoCP in response to our representations and holding objection. Those amendments satisfy our concerns at this stage and we therefore have no objections to the proposals subject to the adoption of those measures.

Please do not hesitate to contact me should you require any further information.

Kind regards

James

**James Stewart-Irvine MSc MRTPI**  
**Planning Manager (South Region)**



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Planning Inspectorate (National  
Infrastructure Directorate),  
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BS1 6PN.

Date: 20<sup>th</sup> July 2016

By e-mail

Dear Sirs,

**RE: NORTH LONDON HEAT AND POWER PROJECT - NOTICE OF ACCEPTANCE OF AN APPLICATION FOR THE NORTH LONDON HEAT AND POWER GENERATING ORDER (APPLICATION REFERENCE NUMBER EN010071)**

**Introduction**

Biffa Waste Services Ltd ('Biffa') has been notified of the above application for the redevelopment of the Edmonton EcoPark. This proposal will involve the decommissioning and demolition of the existing Energy from Waste facility ('EfW') to enable the development of an Energy Recovery Facility ('ERF'). This letter represents our response to the consultation and we would be grateful for the information set out below to be formally considered by the Examiner.

Biffa Waste Services Ltd operates a major waste recycling facility at the Edmonton Materials Recycling Facility ('MRF') located on Ardra Road. The MRF is located to the north of the application site. The Edmonton MRF is an established business and is of key strategic importance to Biffa's waste management capacity in the region. The facility processes up to 250,000 tonnes per year of commercial and municipal waste. The site also serves the North London Waste Authority ('NLWA') area. All vehicles associated with Biffa's operational MRF facility access the site via Ardra Road and utilise the access with Meridian Way.

**Background & Context**

This letter of representation follows a series of previous submissions into the examination process. In our letter dated 23rd March 2016, Biffa raised a holding objection and proposed the following measures for consideration by the Examiner:

- I. Inclusion of a suitably worded planning condition that ensures the existing operations on Ardra Road are protected from undue harm and enforces the conclusions of the Transport Assessment and technical note;*
- II. Clarification of the proposed monitoring strategy, and inclusion of a condition(s) that seeks to enforce the results of the traffic assessment stated at paragraph 3.9.12 of the technical note set out above and permanent relocation of the proposed control point to a location to the south of Deephams Farm Road.*

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- III. *To include provision within the CoCP of the phasing of traffic lights and the Meridian Way junction;*
- IV. *To include provision within the CoCP of a commitment to long-term, regular monitoring of vehicular activities along Ardra Road to ensure that mitigation measures are adopted if determined to be necessary, in consultation with the existing operations along Ardra Road.*

After further consultation with the Applicant, Biffa submitted further representations on 6<sup>th</sup> June 2016 that stated the following:

*“We welcome the requirement for the Applicant to review the measures as set out within the document titled: “The Examining Authority’s second written questions and requests for information”, specifically with reference to 2Q 1.4 and 2Q 6.3. Whilst helpful discussions have previously taken place with the North London Waste Authority, our objections have not yet been overcome since it has not yet been made clear how the draft DCO and CoCP will be revised to secure the measures set out above.*

*Therefore, we support the amendments to those documents as requested by the Examiner. At this time we do not have sufficient information to ameliorate our objections which have been expressed in our previous objections and we continue to express concern about the impact of this development upon our strategically important facility pending clarification of the planning control measures/conditions to be included in any consent so as to ensure the necessary mitigation is implemented and maintained.”*

*The Applicant has since provided an amended Code of Construction Practice (“CoCP”) and has confirmed that an updated Environmental Commitments and Mitigation Schedule (“ECMS”) is due to be provided for Deadline 6. As such, Biffa reserves its position in order to consider both documents together to determine whether our objections have been addressed.”*

### **Further Representations**

Following the Examination Hearings held on 5<sup>th</sup> July 2016 and further to our previous representations dated 4<sup>th</sup> July 2016, the Applicant and Biffa have been in discussions regarding further amendments to the CoCP. The Applicant has proposed the amendments as set out below:

*“11.3.4 Works may be undertaken at the junction of A1055 Meridian Way and Ardra Road and on Ardra Road (other than works associated with the creation of a give-way junction with Deephams Farm Road), for example, carriageway resurfacing required to avoid damage to construction vehicles as well as all other vehicles using the Ardra Road. If such works are required, the works will be undertaken in short sections and at least one lane would be open at all times in the sections where works are undertaken to ensure continued access to affected businesses. To minimise disruption, night working will also be considered, subject to agreement from LB Enfield and consent under Section 61 of the Control of Pollution Act 1974 **and consultation with the Community Liaison Group**. Notice will be given to any resident or local business that would be affected, with the durations provided.”*

*“11.8.2 During construction, vehicular traffic along Deephams Farm Road will be controlled through the use of traffic marshals at both the northern and southern ends of the road. This will help to regulate traffic entering and leaving the site during the busiest construction periods. The need for traffic marshals at both the northern and southern ends of Deephams Farm Road will be*

reviewed periodically. **The Community Liaison Group will be consulted upon review of this strategy.**”

“11.8.3 The HGV monitoring strategy will be **consulted on with the Community Liaison Group and** agreed with LB Enfield **and** is likely to include the following:

- Recording of all vehicles entering/exiting the Edmonton EcoPark via the northern access, including details of the trip purpose and origin/destination;
- Undertaking regular (at least once a year) traffic surveys on Ardra Road during the construction period to understand the vehicle movements to the Edmonton EcoPark in the context of the traffic flows at that time. Traffic surveys will also be undertaken in the first year following the completion of construction. Given that the volume of traffic associated with the Project using Ardra Road is likely to remain unchanged, no further monitoring is proposed beyond this point;
- A mechanism to review the use of the northern access and will identify if vehicles should be using an alternative access (e.g. RRF construction vehicles which should be arriving via the southern site access on Advent Way); and
- Regular liaison with the other business which use Ardra Road to understand any issues and/or concerns that arise during the construction period.”

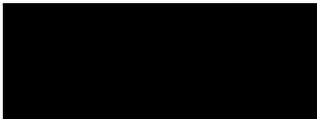
On the basis that the amendments proposed above are formally adopted into the CoCP Biffa is satisfied that the impact upon its operations can be fully considered during the development of this facility and we therefore raise **no objection** to the proposals as set out in the submitted application documents.

However, it should be noted that we reserve our position with regards to future works set out in paragraphs 11.3.4, 11.8.2 and 11.8.3 of the CoCP during the consultation process as described.

I trust these comments will be taken into account in your determination of the current application. Should you have any queries on any of the issues raised then please do not hesitate to contact me.

Yours faithfully

**For Biffa Waste Services Ltd**



**James Stewart-Irvine**  
**Planning Manager**