

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 27th July 2010

Report of
Assistant Director, Planning
& Environmental Protection

Contact Officers:
Aled Richards Tel: 020 8379 3857
Andy Higham Tel: 020 8379 3848
David Warden Tel: 020 8379 3931

Ward:
Edmonton
Green

Application Number : TP/09/1862

Category: Major Other

LOCATION: Yard, Gibbs Road, Montague Industrial Estate, N18 3PU

PROPOSAL: Use of site as an industrial facility for the production of renewable energy from waste timber involving extension to existing building, new pump house, substation and condensers with associated works and formation of a new exit to Gibbs Road.

Applicant Name & Address:

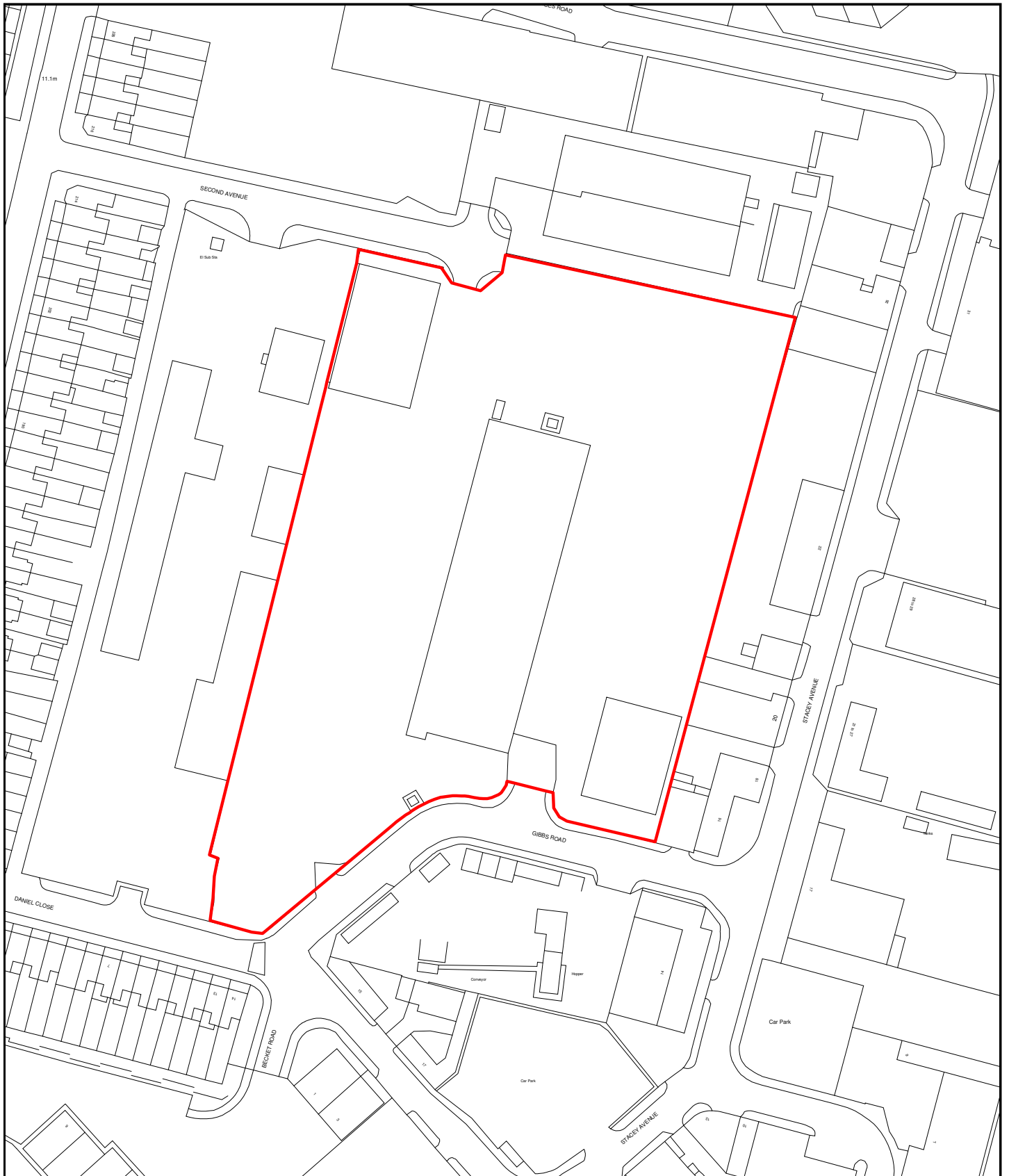
Mr Trad Henderson
Kedco Howard Ltd
1, Quality Court,
Chancery Lane,
London,
WC2A 1HR

Agent Name & Address:

Mr Hugh Smith
LRS Consultancy
1, Quality Court,
Chancery Lane,
London,
WC2A 1HR

RECOMMENDATION:

That planning permission be **GRANTED** subject to an agreement under section 106 and subject to conditions.



Development Control



Scale - 1:1250
Time of plot: 12:10

Date of plot: 09/07/2010

1. Site and Surroundings

1.1 Site

1.1.1 The site is located within the Monague Industrial Estate and extends from Gibbs Road to Second Avenue. The site currently comprises a recently completed large L-shaped building running long the northern and eastern site boundaries (ref. TP/07/2486), a building in the centre of the site that is currently being extended (ref. TP/09/1151), with further existing buildings to the northwest and southwest corners. The remainder of the site comprises hardstanding.

1.1.2 There are existing accesses from both Gibbs Road and Second Avenue, although the latter has a no HGV access condition in place.

1.2 Surroundings

1.2.1 The area is characterised by predominantly heavy industry including some waste and recycling based businesses. However, further to the west and southwest of the site are residential dwellings, in particular traditional terraced properties fronting Montague Road and Daniel Close, respectively.

1.2.2 The site and adjoining land are allocated as part of the Primary Industrial Area and fall within the Central Leaside Area Action Plan area.. The entire site lies within Flood Zone 2, with flood zone 3 less than 10 metres from the site boundary.

2. Proposal

2.1 The proposal would provide a facility to process up to 60,000 tonnes per annum of waste wood to produce up to 12 megawatts of renewable electricity and 10 megawatts of renewable heat energy per hour. This would be achieved through the use of a Biomass CHP facility.

2.2 The process would involve waste timber being delivered to the site, chipped and dried before being fed into a gasification system. The proposed system is modular and is produced by a United States based company, ZEROPOINT. The 6 proposed modules will each include a gasifier chamber, various filtration and heat recovery elements and a turbine/engine unit. The gasifier will heat the dried and pelletised wood to approximately 800 degrees within an oxygen controlled environment to allow thermal conversion of the biomass into syngas. After filtration and heat recovery the syngas will be burnt in the turbine/engine to produce electricity. The heat recovery systems will provide heat energy that will be partially used for the drying process discussed above, with the remainder available as renewable heat energy.

- 2.3 The submitted details state that, at full capacity, it is estimated the facility will be a net exporter of up to 83,000 MWhE (electrical) and 65,000 MWhT (thermal) per annum. The electrical energy will be fed directly into the national grid and the details suggest this could supply up to 19,000 homes, whereas discussions are ongoing regarding the use of the heat energy.
- 2.4 The main by-products of this process are the bottom ash from the gasifier and emissions including Nitrous Oxides and Carbon Monoxide. The submitted details state that the process will produce 450 tonnes per annum of bottom ash, which will be sent to landfill. Two steel exhaust stacks each with a diameter of approximately 0.9 metres and a height of approximately 32 metres above floor level are included within the proposal.
- 2.5 The scheme will utilise the recently constructed large L-shaped building (ref. TP/07/2486) with additional walls and noise insulation proposed to provide a wholly enclosed structure. In addition, in and out accesses to Gibbs Road and an internal circulation route similar to that within this recently approved scheme will be used.
- 2.6 The submitted details state, at full capacity, total vehicle movements to and from the site will be reduced by 80% compared with the previous/lawful use of the site. The details state the entirety of the waste timber feedstock will be supplied by local transfer stations, within a 5 mile radius with most within 3 miles.
- 2.7 The facility would operate 24 hours per day 7 days per week for approximately 8,000 hours per year. However, lorries would deliver waste wood to the facility Monday to Friday between 8 am to 6 pm and Saturday 8 am to 4 pm. The site would be manned 24 hours per day on a three shift basis. In total, the development would employ 35 staff.
- 2.8 The submitted details provide information on the need for renewable energy in the UK, as well as additional information of gasification technologies

3. Relevant Planning Decisions

- 3.1 TP/09/1151 Increase in height of roof of existing building together with external cladding and roller shutter doors, granted with conditions October 2009.
- 3.2 PRE/09/0009 Proposed development of biomass combined heat and power unit.
- 3.3 TP/07/2486 Erection of an open fronted storage building along the north and east boundary, alterations to parking layout and new vehicular access to Gibbs Road, granted with conditions March 2008.

- 3.4 TP/00/1669 Formation of vehicular access, gates, fence and warehouse doors, granted with conditions December 2000.
- 3.5 LBE/88/0034 Demolition of existing factory and provision of access road between Second Avenue and Gibbs Road plus future use of remainder of site for industrial and warehousing development (outline), granted with conditions December 1988.
- 3.6 TP/87/1372 Erection of a toilet block to existing warehouse and erection of a new boundary fence with entrance gates along the proposed new road to Second Avenue), granted with conditions November 1987.
- 3.7 In addition, there are various historic applications largely relating to the industrial use of the site.

4. Consultations

4.1 Statutory and non-statutory consultees

- 4.1.1 Environmental Health initially objected to the adequacy of the noise and air quality information. However, in respect of air quality, following the provision of additional information and an increase in the stack height these concerns were withdrawn; although it was commented that the proposals will increase background NO₂ levels and a contribution of £30,000 to fund air quality monitoring at the nearest site. No further air quality conditions are requested. In respect of noise, additional details are awaited from the applicant to confirm the amount of noise insulation required in the buildings, in the absence of these, this matter could be addressed by condition. An update will be provided at the committee meeting.
- 4.1.2 Place Shaping & Enterprise provide support in principle for the proposal. Some concerns were previously raised regarding the impact on the potential for CHP facilities at the Eco Park site. However, they later confirmed that the Eco Park is going to use a Solid Recoverable Fuel that will be exported off-site for the majority of the energy output. As a result there will be a limited impact on this facility.
- 4.1.3 The Greater London Authority stage one report states that while the application is generally acceptable in strategic planning terms, it does not comply with the London Plan in respect of the inadequate air quality assessment and that further work is required in respect of waste heat and transport. The report goes on to recommend changes that might remedy the deficiencies:

Climate Change: evidence of discussions with potential users of the waste heat should be provided

Air Quality: provide additional information on cumulative impact from CHP and traffic movements; use 2009 rather than 2006 data; more information on the proposed operational regime and further dispersion modelling should be undertaken to demonstrate the most likely effects as well as the worst case scenario; further information on the short term emission limit values; and, once the further modelling has been provided alterations to the stack height to aid plume dispersion and further mitigation measures to reduce emissions of NOx may be required.

Transport: the trip generation figures should be supported by appropriate survey data. Cycle parking should be provided in accordance with the minimum standards in the London Plan and delivery times should be controlled by condition.

- 4.1.4 Transport for London has no objection in principle. The level of car parking was accepted, subject to the provision of a disabled parking space and that cycle parking should be provided at a rate of 1 per 500 square metres. Concerns were raised that the submitted Traffic Impact Assessment needed appropriate survey data to back up its figures and should include a distribution of movements throughout the day rather than just daily totals. In addition, further controls were requested on the timing of deliveries to remove peak hours (08:00 -10:00 and 16:00 to 18:00). A Delivery & Service Plan will be required to set out the management put in place to enforce this. A Travel Plan focusing on car sharing and the use of public transport should also be secured by condition. The applicant confirmed that two disabled spaces, up to 18 cycle spaces, a draft Delivery and Service Plan to achieve large suppliers 12 tonne deliveries between 10:00 and 16:00 with best endeavours to limit smaller suppliers deliveries to non-peak times and agreement to a Travel Plan condition. In light of these commitments, TfL confirms no objection subject to conditions.
- 4.1.5 The Environment Agency initially raised objection due to an inadequate Flood Risk Assessment. This objection was later withdrawn. Their final response confirms no objection subject to conditions relating to flood risk, contaminated land and surface water drainage (which restricts infiltration to the ground). The response concludes with advice regarding waste, confirming that the Council will need to ensure that this plant is considered in line with the national waste policy which aims to move waste up the waste hierarchy - reduce, re-use, recycling and compositing, recovery and disposal as final option. The plant should not divert waste wood from markets that fall further up the waste hierarchy. Finally, the response confirms, a permit under the Environmental Permitting Regulations 2007 will be required for the proposed development. A separate consultation confirms an application for such a permit has been made.

4.1.6 The London Development Agency support the principle of development and confirm it is identified in the Upper Lee Valley OAPF Energy Strategy as a potential CHP plant supplying heat for a future decentralised network. The response states the site is well located in relation to the indicative route identified in the Strategy and the application is welcomed in terms of its potential to act as a possible heat source for an area wide district heating network. The response states that the scope for using the heat off-take from the plant is limited in the short term since the build out of the network (if this goes ahead) is expected to take place over the next 5-10 years. In respect of heat use opportunities prior to an area wide network being developed, the Coca Cola plant and the planned Meridian Water development the main significant potential further customers in the immediate vicinity of the site. Tesco and Ikea could present additional demands, but other main heat demands identified in the OAPF Energy Strategy are some distance away and would only become available if the wider scheme is brought forward. There is unlikely to be a significant heat demand at any of the sites on the Montague Road Estate, but these would need to be understood in greater detail in order to develop a case for connecting them. This work could be required through a S106 agreement. In addition, it will be necessary to ensure there is space provided within the site boundary to install distribution pumps, LTHW pipework, steam pipework, water treatment and pressurisation, thermal storage and associated ancillary equipment in the future. The response concludes that to maximise opportunities for heat off-take in the near term it is recommended that the developer is required to:

- Engage in further discussions with the Montague Road Estate and Edmonton Green Shopping Centre in order to establish more detail around heat update potential and associated timescales.
- Confirm the timescale for expansion of the Coca Cola plant, the current and future heat load for the site and that the grade of steam provided by the proposed gasification plant is suitable to meet Coca Cola's needs.

4.1.7 Natural England raises concerns that a Phase 1 Walkover survey has not been completed and requests that one be undertaken.

4.1.8 London Fire and Emergency Planning Authority (LFEPA) is satisfied with the proposals.

4.1.9 Thames Water has no objection to the application.

4.2 Public response

4.2.1 Consultation letters were sent to 110 neighbouring properties. At the time of writing no replies have been received.

5. Relevant Policy Considerations

5.1 UDP Policies

(I)GD1	Regard to Surroundings / Integrated into Local Community
(I)GD2	Quality of Life and Visual Amenity
(II)GD1	Appropriate location
(II)GD3	Character / Design
(II)GD6	Traffic Generation
(II)GD8	Site Access and Servicing
(I)E1	Enfield as a Location for Business
(I)E2	Enhance, bring into use and retain employment uses
(I)E4	Most efficient use of employment land
(II)E2	Concentrate B1 – B8 uses within Primary Industrial Areas
(I)EN1	Quality of the environment throughout the Borough
(I)EN6	Minimise Environmental Impact of Developments
(II)EN29	Ensure maximum recycling
(II)EN30	Land, air, noise and water pollution

5.2 Emerging Local Development Framework: Core Strategy:

5.2.1 The Planning and Compulsory Purchase Act 2004 requires the Council to replace the Unitary Development Plan with a Local Development Framework. At the heart of this portfolio of related documents will be the Core Strategy, which sets out the long-term spatial vision and strategic objectives for the Borough.

5.2.2 The Core Strategy has now been submitted to the Secretary of State and an Inspector appointed. The Examination in Public to consider whether the Strategy meets legal requirements and that it passes the tests of soundness (it is justified, effective and consistent with national policy) is scheduled for this summer and thus, some weight can be given to the policies contained therein. The following are considered of relevance to the consideration of this application.

SO1	Enabling and focusing change
SO2	Environmental sustainability
SO5	Education, health and wellbeing
SO6	Maximising economic potential
SO7	Employment and skills
SO8	Transportation and accessibility
SO10	Built environment
CP1	Strategic growth areas
CP7	Health and social care facilities and the wider determinants of health
CP13	Promoting economic prosperity
CP14	Safeguarding strategic industrial locations

CP15	Locally significant industrial sites
CP16	Taking part in economic success and improving skills
CP20	Sustainable energy use and energy infrastructure
CP21	Delivering sustainable water supply, drainage and sewerage infrastructure
CP22	Delivering sustainable waste management
CP24	The road network
CP25	Pedestrians and cyclists
CP27	Freight
CP28	Managing flood risk through development
CP29	Flood management infrastructure
CP30	Maintaining and improving the quality of the built and open environment
CP32	Pollution
CP36	Biodiversity
CP37	Central Leaside
CP46	Infrastructure contributions

5.3 Emerging Local Development Framework: North London Waste Plan:

5.3.1 The Preferred Options stage of the North London Waste Plan was published in October 2009, with a Summary of Responses published in March 2010. The application site is not one of the allocated sites for wastes uses within the plan. The following policies are relevant. However, it must be acknowledged that the plan may well be subject to changes before adoption (planned for December 2011) and, as a result, the weight to be attached is limited.

NLWP 1	Location of waste development
NLWP 3	Ensuring High Quality Development
NLWP 4	Decentralised energy
NLWP 5	The Management of Construction, Demolition and Excavation wastes

5.3.2 The plan addresses “Construction, Demolition & Excavation wastes” as follows:

4.29 Our preferred option is to assume that construction, demolition and excavation wastes are largely managed on site and that North London Waste Plan and development control policies will ensure that developers must recycle or reuse such wastes on site. The rise in the landfill tax is a key driver in ensuring less of this waste goes to landfill. As an example, the Olympic Park is currently recycling/reusing over 96% of wastes on site. The small remainder is largely hazardous wastes that need to be disposed of in specialised facilities outside of London.

4.30 For the purposes of this Plan it is assumed that no specific additional and provision needs to be made for construction, demolition & excavation. However policy NLWP 5 will ensure

*that on-site recycling and re-use is maximised by developers.
See Appendix 4 for more details on waste arisings.*

5.3.3 Gasification is defined as “The thermal breakdown of organic material by heating waste in a low oxygen atmosphere to produce a gas. This gas is then used to produce heat/electricity”.

5.4 Emerging Local Development Framework: Central Leaside Area Action Plan:

5.4.1 The Issues and Options stage of the Central Leaside Area Action Plan was published in February 2008 and consultation ended in April 2008. At present the document remains at an early stage and does not include specific policies. As such, the current document can be afforded very limited weight. Whilst, the Preferred Options document is shortly due to be released for consultation, even at this stage the weight to be attached will be limited. The document will, however, continue to gain weight as it passes through this consultation process. However, it should be noted that the site falls within the ‘Angel Road area’ representing ‘a major opportunity for change’.

5.5 London Plan

3C.1	Integrating transport and development
3C.2	Matching development to transport capacity
3C.3	Sustainable transport in London
3C.17	Tackling congestion and reducing traffic
3C.23	Parking Strategy
4A.1	Tackling climate change
4A.2	Mitigating climate change
4A.3	Sustainable design and construction
4A.4	Energy assessment
4A.5	Provision of heating and cooling networks
4A.6	Decentralised Energy: Heating, Cooling and Power
4A.7	Renewable Energy
4A.9	Adaptation to Climate Change
4A.12	Flooding
4A.13	Flood risk management
4A.14	Sustainable drainage
4A.19	Improving air quality
4A.20	Reducing noise and enhancing soundscapes
4A.21	Waste strategic policy and targets
4A.22	Spatial policies for waste management
4A.23	Criteria for the selection of sites for waste management and disposal
4A.24	Existing provision – capacity, intensification, re-use and protection
4A.25	Borough level apportionment of municipal and commercial/industrial waste to be managed

- 4A.26 Numbers and types of recycling and waste treatment facilities
- 4A.27 Broad locations suitable for recycling and waste treatment facilities
- 4B.8 Respect Local Context and Communities
- Annex 4 Parking standards.

5.4 Other Relevant Considerations

- PPS1 Delivering Sustainable Communities
- PPS3 Housing
- PPG13 Transport
- PPS10 Planning for Sustainable Waste Management
- PPS23 Planning and Pollution Control
- Enfield Renewable Energy and Low Carbon Study (2010)

6. **Analysis**

6.1 Principle

- 6.1.1 The proposal has the potential to contribute to the provision of additional waste recycling facilities, as supported by the London Plan (2008).
- 6.1.2 The existing use of the site is primarily B8 storage, with a mixture of industrial and waste uses within the surrounding Montague estate. The area is designated a Primary Industrial Area (PIA) within the Unitary Development Plan and Strategic Industrial Land (SIL) in the London Plan (2008). The Montague Industrial Estate has been the subject of substantial grant investment of public funds to upgrade infrastructure and enhance operational conditions for the range of industrial firms on the estate. These and similar improvements are supported by the emerging Central Leaside Area Action Plan. There are concerns, therefore, that the provision of additional land for waste uses has the potential to adversely effect these environmental improvements. However, the application proposes a modern method of dealing with waste wood in an enclosed environment and utilising the latest technology to provide renewable energy. It is considered that such a high-tech solution has the potential to add to, rather than detract from, the environmental improvement of the estate. However, much will depend upon the day to day management of the facility.
- 6.1.3 A risk management plan has been submitted in support of this application. However, this focuses on matters such as spillages and fire. It does not deal with the day to day management of the facility. However, it is considered acceptable to secure such a management plan by condition. This will be further supported by conditions which prevent external storage of materials, only off loading of waste timber inside the timber intake building, details of fast action doors to the

timber intake building, that waste timber shall only be processed on site and shall not be exported in either raw or processed form and that chipped/pelletised timber shall only be transported from the wood chip processing building by an overhead conveyor to the gasifier building the details of which will need to be approved.

6.1.4 Having regard to the above, and in particular the high-tech nature and renewable energy provisions of the proposed development, as well as policies 4A.6-7 and A4.21-27 of the London Plan (2008), it is considered that, subject to the detailed criteria below, the principle of the proposed use is considered acceptable.

6.2 Highway Safety

6.2.1 *Traffic Generation*

6.2.2 At a pre-application stage the applicant that the acceptability of the proposals would be contingent upon demonstrating that there will be no material increase in the volume or worsening in the character of traffic entering and exiting the site. This provides the principle basis for the assessment of this element of the proposal.

6.2.3 Whilst some concerns have been raised regarding the lack of detailed survey data, the Traffic and Transportation and TfL now accept the applicant's traffic generation figures for the existing/lawful use of the site at approximately 359 movements per day, of which 204 were by HGVs.

6.2.4 The Traffic and Transportation team have raised further concerns regarding the assumptions that the feedstock would be delivered in loads of up to 12 tonnes due to the lack of evidence that the local suppliers have this capacity. However, even assuming a 5-6 tonne load the 60,000 tpa would give rise to only 84 HGV movements per day. Taking the movements from the 35 staff, notwithstanding that these would be on a shift basis and assuming a worst case scenario of single vehicle usage, this would provide a further 70 movements. This provides for a total of 154 movements per day, of which 84 were by HGVs. Even when considering these assumptions, the scheme would result in total and HGV vehicle movements at only 43% and 41%, respectively, of those previously indicated.

6.2.5 Notwithstanding these reductions, to ensure the most positive traffic outcome, TfL have requested conditions relating to a Delivery and Service Plan, a Sustainable Transport Travel Plan and that deliveries only take place between the hours of 08:00 to 18:00 Monday to Friday and 08:00 to 16:00 on Saturdays and at no time on Sundays or Bank Holidays. The Delivery and Service Plan will seek, where possible, to further limit these hours, in particular for larger vehicles and supply contracts to avoid the morning and afternoon peak hours of 08:00 to 10:00 and 16:00 to 18:00. These restrictions also result in an improved

transport environment for residents surrounding the Montague Estate access road.

6.2.6 In light of the above, in particular the significant reduction in total and HGV movements, as well as the improvements in traffic management secured by conditions, the traffic generation is considered acceptable.

6.2.7 Access

6.2.8 The development proposes to utilise the existing accesses on Gibbs Road to provide access to the car parking area for staff and visitors, and to provide an entrance only into the main site for delivery/servicing vehicles. A new exit is proposed between the two existing accesses in order to facilitate the proposed one-way internal access road. The new exit is located on the outside of the bend on Gibbs Road so it is considered that adequate visibility would be achievable.

6.2.9 Adequate pedestrian inter-visibility splays would also need to be provided at each of accesses however, this is not indicated on the application drawings. However, these can be secured by condition requiring details of landscaping and enclosure to be submitted.

6.2.10 The existing Second Avenue access is also to be maintained for 'cars and emergencies only'. In order to protect the amenity of the residents adjoining the Second Avenue/Montague Road junction and to ensure the effective operation of the one way working system, it is considered necessary to restrict this access to emergency vehicle only. This will be secured by condition.

6.2.11 The internal pedestrian footway within the site has an average width of 1.5m as measured from Drawing Number PL01. However, footways should have a minimum width of 2.0m (absolute minimum 1.8m) to comfortably allow two pedestrians, including a wheelchair, to pass. As there is considered to be sufficient space within the site to accommodate acceptable footways, this outstanding issue will be addressed by condition.

6.2.12 Overall, subject to the above conditions, the proposed access arrangements are considered acceptable.

6.2.13 *Vehicular and Cycle Parking*

6.2.14 It would have been desirable to have received a full Travel Plan as part of the planning application, however, the commitment to the provision of a Travel Plan and the measures set out in the planning application are acknowledged. In order to ensure that sustainable travel habits are established from day one, this plan will be secured through the S106 agreement and will need to be implemented prior to occupation of the site.

- 6.2.15 The Traffic and Transportation team raised some concerns regarding the adequacy. However, the proposed car parking provision also includes car share spaces which form a part of the proposed Staff Travel Plan for the new facility. Through the implementation of the travel plan the number of single occupancy trips should reduce, however this would be undermined by an excessive level of car parking. As a result, the proposed formal car parking provision is considered to be of a level that includes an element of car parking restraint in line with current planning policy, without resulting in an excessive demand for on-street parking. Therefore, the proposed car parking provision is considered acceptable.
- 6.2.16 If there is to be shift work, then it would be reasonable to assume that there would be some overlap of arrivals and departures and as a result, the proposed development may generate on-street parking. However, the site does have the potential to provide a further 5 spaces if it is considered that the 10 spaces won't be enough to accommodate demand.
- 6.2.17 It is recommended that the travel plan include that car parking (both off and on-street) will be monitored on a regular basis and that if the number of single occupancy car trips does not reduce in line with targets, then the developer is required to pay for the implementation of parking restrictions on Gibbs Road. A Bond figure will be required to cover any potential survey costs of the Council should the Travel plan not be implemented correctly and this will be secured within the S106 agreement.
- 6.2.18 In respect of the car park layout, the two disabled spaces are substandard. In addition, the aisle width to the rear of these spaces, 5.0m, is also substandard as a minimum space of 6.0m is required. Therefore, there are some minor amendments required to the car parking layout, which, as there is adequate space to achieve these requirements, can be secured by condition.
- 6.2.19 In respect of cycle parking provision, the Transport for London's Cycle Parking standard is for 1 space per 500m² which would result in a minimum permissible requirement of 18 spaces. However, TfL have accepted that due to the automated nature of the equipment covering much of this floor area a lower provision of 8 spaces would be acceptable. These can be secured by condition.
- 6.2.20 Overall, subject to revisions secured by condition, the proposed parking arrangements are considered acceptable.

6.3 Renewable Energy and Sustainability Design and Construction

6.3.1 *Renewable Energy*

- 6.3.2 The surplus electrical energy, some 83,000 MWhE (electrical) per annum, will go directly into the national grid via an on-site substation. This will provide a significant source of renewable electricity, which in turn will make a strong contribution to mitigating the effects of climate change.
- 6.3.3 The use of heat energy, however, is more complex. The amount of surplus heat energy, some 65,000 MWhT (thermal) per annum, means that no single supplier would be able to take it all. Indeed, it is unlikely that all of the excess heat energy would be in use until an Area Wide Network is implemented (this is confirmed by the LDA). As a result the heat usage must be split into two stages, pre and post-Area Wide Network.
- 6.3.4 In respect of the post-network stage, the S106 agreement will require connection and supply of excess heat to be made available. Indeed, the presence of this facility is likely to significantly reduce the risks involved in establishing such a network as a significant supply element would already be in place.
- 6.3.5 The pre-network stage is more challenging. Letters of interest have been provided by Coca Cola and Asda. In particular, these seek to enter further discussions once there is greater certainty through the grant of planning permission. The submitted Heat Assessment confirms discussions with St Modwen regarding the wider existing Edmonton Green Shopping Centre, along with the proposed north section redevelopment. The LDA suggest that the proposed Meridian Water development would be the other main demand, along with some potential from Tesco and Ikea. There are concerns regarding the number of organisations involved, their own development plans and whether, in practice, these discussions will result in active use of the excess heat. However, the potential heat users are unable to commit further resources until there is a greater certainty of supply (i.e. that planning permission has been granted, or even that the site is up and running). As a result, it is considered that it would be unreasonable to require agreements to be in place prior to the granting of planning permission. However, the requirement to continue to pursue all reasonable endeavours to secure use of this renewable fuel will be provided for with the S106 agreement.
- 6.3.6 The agreement will require reports on the ongoing 'all reasonable endeavours' at the following stages: before development commences, before installation of the first 20,000 tpa module, the second 20,000 tpa module and the final 20,000 tpa module. The agreement will set out Head Objectives that must be met prior to each stage. Discussions are still underway regarding the detail of these objectives and an update will be provided at the meeting.
- 6.3.7 The scheme also provides the opportunity to assist in the regeneration of the Montague Estate by providing opportunities for existing and

future commercial tenants to utilise this renewable heat resource. Whilst there are concerns regarding the extent of the existing need, some expressions of interest have been provided with the application. There will be a specific requirement to make all reasonable endeavours to secure usage within the estate. Discussions are currently being held regarding securing a specific fund to help bridge the infrastructure gap in respect of the surrounding estate.

6.3.8 The development will deal only with Treated Waste Wood (TWW), indeed the S106 agreement will provide a requirement that 95% of the feedstock (by weight) is TWW, as set out in the Waste Hierarchy section below. As well as achieving waste objectives, this will ensure that biomass, such as solid recoverable fuel, that could more readily be used in a CHP system where the heat usage was already confirmed, could not be used at the site. Whilst in the future, when an Area Wide Network is in place, this may be something that could be the subject of review, it is correct that this should require an amendment to the application. In particular, a review of the transport implications would be required. As a result of this limitation, the development is restricted to the objective of diverting TWW, which the submitted details suggest is currently sent to landfill and is acknowledged as very difficult to re-use or recycle, to provide energy.

6.3.9 Overall, the site will provide a significant renewable electricity contribution from first operation, which will expand as each of two remaining 20,000 tpa modules are added. In respect of heat energy, significant further work is required for both pre and post-Area Wide Network solutions. However, it is appropriate, and necessary, for this work to be completed once planning permission has been granted and this will be secured by a staged S106 agreement that requires reports and the meeting of heat objectives prior to commencement of development, first use of the plant, installation of the second and then the third 20,000 tpa modules.

6.3.10 *Waste Hierarchy*

6.3.11 The Environment Agency's comments regarding the need to ensure that this plant is considered in line with the national waste policy which aims to move waste up the waste hierarchy - reduce, re-use, recycling and composting, recovery and disposal as final option and that the plant should not divert waste wood from markets that fall further up the waste hierarchy are accepted. This will be addressed in two ways, firstly the S106 will require that at least 95% of the feedstock (by weight) shall be Treated Waste Wood (TWW). This will ensure that waste which could be more readily re-used or recycled should be largely avoided. A 100% figure is not proposed to avoid operational difficulties. In addition, a condition is proposed requiring a Waste Hierarchy Strategy to be submitted, approved and implemented. This will require screening of intake and advice to customers. In particular, un-treated construction and demolition waste shall be diverted to (in

order) re-use or, subsequently, recycling. In addition, information will need to be provided to customers on the reduction in the use of materials.

6.3.12 *Sustainable Design and Construction*

6.3.13 The site will be powered from its on site renewable energy from the CHP process, which significantly exceeds the requirements for 20% on site renewable. Indeed, as outlined above, the site will be a significant net exporter of electrical and heat energy.

6.3.14 The development will exceed building regulations insulation requirements with a U-value of 0.2 for the roof and wall panels. Recycled timber for cladding the substation

6.3.15 The site cannot adopt a full SUDS approach, due to on site land contamination. However, a condition is proposed requiring a feasibility study for the harvesting of rainwater from the substantial area building roofs for use on site, with prior treatment if required.

6.3.16 The industrial process will produce a number of by-products, the most significant of which will be approximately 450 tonnes of bottom ash/char material per annum. A condition is proposed requiring a study into sustainable methods of disposal of these products, including, in the case of the bottom ash, use as a secondary aggregate.

6.3.17 Overall, the renewable energy and sustainable design and construction elements of the proposal are considered acceptable.

6.4 Air Quality

6.4.1 The Environmental Health Team, based upon additional information that has been received and the increase in stack height to 32 metres, which will assist with dispersal of by-product gasses, are now satisfied with the development. Whilst comment is made that the proposals will increase background NO₂, this increase has been accepted. The site will be subject to an Environmental Permit from the Environment Agency. As a result, it will not be necessary to impose planning conditions regarding air quality. However, the pre-application advice confirmed the applicant would be required to contribute towards improvements to the air quality monitoring in the area. The Environmental Health Team confirms this requirement. This provides for a S106 contribution of £30,000.

6.4.2 Dust will be controlled by a Dust Management Plan, which will be secured by condition. A further condition will require a fast action automatic door system to the timber intake building.

6.4.3 Overall, the air quality impacts of the proposal are considered acceptable.

6.5 Impact on Character of Surrounding Area

6.5.1 The site is located within an industrial area and the principle of development has been assessed above and found to be acceptable. The remaining impact on the character of the surrounding area relate to the design, visual impact and layout of the proposals, which is assessed below.

6.5.2 *Design and visual impact*

6.5.3 The proposed building provides for a simple industrial design, whilst not particularly aspirational, is not out of keeping with its surroundings. Moreover, it reflects the design of the buildings previously approved at this site. There are some concerns regarding the increased stack height, now at some 32 metres above finished floor level. However, these two stacks are less than 1 metre in diameter, which will prevent them from being overly dominant. Overall, given the surrounding industrial context the proposed design and resulting visual impacts are considered acceptable.

6.5.4 *Layout*

6.5.5 The proposed layout provides for a high degree of site coverage. However, the internal road layout works well; all but the timber intake building have previously been approved and this level of built development facilitates the internal only unloading facilities that will provide for a modern and controlled waste environment.

6.5.6 The scheme includes indicative landscaping along the boundary with Gibbs Road, this will be secured by condition.

6.5.7 Overall, it is considered the proposed development would have an acceptable impact on the character of the surrounding area.

6.6 Impact on Neighbouring Properties

6.6.1 The site is surrounded by commercial properties, with residential dwellings at to the west along Montague Road and to the southwest Daniel Close with Rays Avenue and Rays Road beyond. The main impacts on these dwellings, as well as the surrounding commercial properties relate to noise and odour from the proposed operation; each is addressed in turn below.

6.6.2 Air quality impacts have been addressed above and will not be repeated here. The impact from traffic is addressed above, the overall reduction in transport movements and restrictions working hours should reduce the impact on surrounding residents when compared with the lawful use of the site.

6.6.3 *Noise*

6.6.4 The nearest dwelling is in Daniel Close and is approximately 15 metres from site boundary. The distance to the main building is some 65 metres with the intervening area used as an internal road, fire hydrant tank, car park and the substation. The nearest substation building would be approximately 18.5 metres from the front façade of properties in Daniel Close. However, this will be an enclosed building with the remaining substation elements some approximately 30 metres from the façade of these properties. Whilst substation equipment has the potential to emit a humming sound that may cause a nuisance to residents, the minimum distances required by EDF Energy are considerably exceeded. The submitted noise assessment has not addressed this matter in detail. As a result, further comments are awaited from the applicant and will be reported at the meeting. However, it is clear that any noise impacts could be overcome by the enclosure of this plant and equipment, where this is not proposed already.

6.6.5 In respect of the noise emanating from the main building this will include the plant machinery, feeding equipment, pelletisation, unloading of waste timber, as well as the gasifiers and CHP engines. However, this will operate in an entirely enclosed environment. The Environmental Health team are not satisfied with the noise data within the submitted assessment and further information has been requested. It is considered, however, that this will inform the level of attenuation required, rather than prevent development. If necessary, this matter could be addressed by a suitably worded condition. An update will be provided at the committee meeting.

6.6.6 To ensure the effect of the noise insulation is not bypassed by the opening of the doors to the feedstock building a condition is proposed that will require a scheme to be submitted and approved. This will secure a fast action automatic door system, along with a management plan, which shall include details of signage, a traffic light system and road markings to ensure vehicles do not activate the doors until they are actually entering the building (i.e. queuing vehicles must not activate the door opening mechanism).

6.6.7 The scheme does, however, include some external plant. Whilst it is accepted that the siting of this plant and the layout of the buildings will reduce their impact, the submitted assessment does not adequately address the noise emanating from this plant. However, the plant is understood to produce a limited amount of noise, which could, if required, be attenuated by condition. An update will be provided at the committee meeting.

6.6.8 *Odour*

6.6.9 As the scheme will imported a largely dry material, or even in the case of wet wood, the odours produced are limited. The submitted details confirm that the systems involved in processing the waste timber will not themselves give rise to odour problems. Moreover, these operation will take place in an enclosed environment. As a result, the restrictions requiring internal tipping and processing of waste timber, as well as the associated management plan, will ensure the development does not result in an unacceptable odour problem.

6.6.10 Overall, it is considered that the impact on the surrounding properties including commercial and residential properties, will be acceptable.

6.7 Other Matters

6.7.1 *Ecology*

6.7.2 Natural England has raised concerns regarding the lack of a Phase 1 Walkover assessment in respect of the potential ecological value of the site and presence of protected species. However, in this case, the site has been the subject of intensive development over the course of some months involving the construction of the L-shaped building and the raising of the roof of the centre building. Having regard to the fact that the remainder of the site is hard standing, it is considered there is a very low ecological potential for the site. The only area where there remains any realistic potential for protected species is the retained building to the northwest corner of the site. Given that, even this building, has a low potential due to its recent industrial use and recent construction activity involving this building, it is considered acceptable for such a survey to be undertaken through a suitably worded planning condition.

6.7.3 *Flood Risk*

6.7.4 The revised Flood Risk Assessment now satisfies the Environment Agency's concerns. Mitigation measures will be secured by condition. These involve the provision of approximately 136m³ of compensatory flood storage on site and limiting the surface water run-off generated by the 1 in 100 year critical storm, taking the effects of climate change into account, so that it will not exceed the existing site run-off rate and will not increase the risk of flooding off-site.

6.7.5 *Contaminated Land*

6.7.6 The Environment Agency has identified the site as likely to be contaminated and located in a Source Protection Zone 2, which is also close to the Pymmes Brook. However, they are satisfied that this can be adequately addressed through conditions. A Directive is also proposed providing additional instructions from the Environment Agency on the reports required. Given that the site comprises almost entirely hardstanding and this is proposed to be retained, it is

considered these matters can be adequately addressed by the conditions proposed.

6.7.7 *Risk Management*

6.7.8 A risk plan shows an adequate identification of the site risks with a clear indication of the management of these risks. However, detail will be required in this area but it is acceptable for this to form part of the management plan condition. London Fire and Emergency Planning Authority are satisfied with the proposals and the Environment Agency will have a monitoring role through the Environmental Permitting Regulations 2007.

6.7.9 Overall, subject to conditions, the risk management at the site is considered acceptable.

6.8 Section 106 Matters

- 6.8.1 For the reasons set out within the report above, an agreement under S106 will be required to secure:
- the maximum capacity of 60,000 tonnes per annum for the facility
 - at least 95% of the feedstock (by weight) shall be Treated Waste Wood (TWW)
 - use of the Heat Off-take building solely for plant and machinery associated with the export of heat and steam from the site
 - prior to the commencement of development a report including detailed plans showing the routes within the site of waste heat off-take (to ensure that space is made available now)
 - the export of surplus renewable electrical and heat energy
 - all reasonable endeavours to use heat energy prior to an area wide network, including reporting and phasing of development in respect of heat off-take objectives
 - requirements to provide connections for an Area Wide Heating Network
 - requirements to provide connections for individual or group heat users
 - requirements to provide an infrastructure delivery fund to support the use of heat energy within the Montague Industrial Estate
 - a contribution of £30,000 towards air quality monitoring in the local area
 - travel plan including monitoring and a bond for highway restrictions

7. **Conclusion**

- 7.1 The proposed development will produce a significant amount of renewable electrical and heat energy. The latter has the potential to help progress and, in part, de-risk the proposed Area Wide Heating Network. Whilst it would be preferable to have agreements in place for the use of the surplus heat, the difficulties in securing such agreements without certainty of supply are acknowledged. The S106 agreement, however, will ensure that all reasonable endeavours are used to secure use of the surplus heat prior to an Area Wide Network and a requirement to connect to such networks. Overall, on balance, subject to the restrictions S106 agreement and those imposed by condition, the proposed development is considered acceptable.

8. Recommendation

- 8.1 That planning permission be GRANTED subject to an agreement under section 106, as outlined above, and subject to the following conditions:

1. The development shall not commence until a feasibility study on the sustainable use of by-products, in particular re-use of the bottom ash/char material potentially as a secondary aggregate, has been submitted to and approved in writing by the Local Planning Authority. The use of the by-products shall accord with the approved details and shall be implemented in accordance with the approved time scales.

Reason: In the interests of sustainable development and mitigating the impacts of climate change.

2. The development shall not commence until a Management Plan, including a Dust Management Plan, addressing the day to day operating practices of the site that will reduce its impact on the surrounding environment (in respect of noise/air quality/odour/dust/hazardous materials), manage risks within the site processes and, in respect of dust, technical specifications of air tightness of the building has been submitted to and approved in writing by the Local Planning Authority. The operation of the facility shall at all times be in accordance with the Management Plan.

Reason: To reduce the impact of the development on the local environment, including the amenities of nearby occupiers, and in the interests of sustainable development.

3. The development shall not commence until a scheme for the provision of a fast action automatic door system for the timber intake building, along with a management plan, which shall include details of signage, a traffic light system and road markings to ensure vehicles do not activate the doors until they are actually entering the building (i.e. queuing vehicles must not activate the door opening mechanism) has been submitted to and approved in writing by the Local Planning Authority. In take material shall only be offloaded inside the timber

intake building, with ingress via the door on elevation B and egress via the door on elevation D of plan 0973/PL08 received by the Local Planning Authority on 21st December 2009. The doors on elevation A to the Timber intake and storage building, shown on the aforementioned plan, shall not be used for the intake of waste timber materials. The door system and management plan shall be in use at all times that the facility is operational.

Reason: To reduce the impact of the development on the local environment, including the amenities of nearby occupiers.

4. The development shall not commence until a feasibility study on the harvesting of rainwater from the building roofs for use on site, with prior treatment if required, has been submitted to and approved in writing by the Local Planning Authority. The approved rain water harvesting system shall be implemented in accordance with the approved details prior to first use of the site and shall be retained thereafter.

Reason: In the interests of sustainable development.

5. The development shall not commence until a Waste Hierarchy Strategy, which aims, in particular, to ensure un-treated construction and demolition waste shall be diverted to (in order) re-use or, subsequently, recycling, has been submitted to and approved in writing by the Local Planning Authority. It shall include screening of intake material, advice to customers and the regular provision of information to customers on the reduction in the use of materials. The facility shall operate at all times in accordance with the approved strategy.

Reason: In the interests of sustainable development, to ensure waste is dealt with as high up the hierarchy as possible.

6. No goods, products or waste material (including timber intake or chipped timber feedstock material) shall be deposited or stored on any open part of the site. Chipped/palletised feedstock timber shall only be transported from the wood chip processing building by overhead conveyor to the gasifier building. Waste timber shall only be processed on site and shall not be exported in either raw or processed form. Unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of amenity and the appearance of the site, to ensure the development is operated in accordance with the approved details.

7. The development shall not commence until details of the overhead conveyor system linking the wood chip processing and gasifier buildings, including covering and insulation, have been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance prior to first use of the site and shall be retained thereafter.

Reason: To reduce the impact of the development on the local environment, including the amenities of nearby occupiers.

8. The development shall not commence until a bat survey has been undertaken of the existing heat off-take building, in accordance with the most recent guidance published by Natural England, and any necessary mitigation measures have been completed in accordance with details, which shall have first been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development does not unacceptably affect a this protected species.

9. Notwithstanding the submitted details, the development shall not commence until a Noise Assessment addressing noise from the proposed building, external plant and substations areas, which may include mitigation measures including increase noise insulation and enclosures around these noise sources, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details before first use of the facility hereby approved and shall be retained thereafter.

Reason: To protect the amenities of nearby residential and commercial properties.

10. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995, or any amending Order, the shall only be used for the production of energy from waste timber and shall not be used for any other purpose..

Reason: To ensure the implications of any potential change of use are adequately assessed through a planning application.

11. The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) dated May 2010, SLR Ref: 403.3163.00001 and the following mitigation measures detailed within the FRA:

1. Limiting the surface water run-off generated by the 1 in 100 year critical storm, taking the effects of climate change into account, so that it will not exceed the existing site run-off rate and will not increase the risk of flooding off-site.
2. Provision of approximately 136m³ of compensatory flood storage on site.

Reason:

1. To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site.
2. To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided.

3. To reduce the impact of flooding on the proposed development and future occupants.
12. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:
- 1) A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
 - 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - 3) The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 - 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect the water environment.

13. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To protect the water environment as the site is likely to be contaminated and located in a Source Protection Zone 2 and close to the Pymm's Brook.

14. The external finishing materials shall match those detailed within application, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a satisfactory appearance.

15. Deliveries to and collections from the site shall only take place between the hours of 08:00 to 18:00 Monday to Friday and 08:00 to 16:00 on Saturdays and at no time on Sundays or Bank Holidays.

Reason: To protect the amenities of nearby residential and commercial properties.

16. The development shall not commence until a scheme to provide Emergency Access only from Second Avenue, which shall include signage has been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented before first use of the facility and retained thereafter.

Reason: To protect the amenities of nearby residential and commercial properties.

17. The development shall not commence until a Delivery and Servicing Plan has been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be in use at all times the facility is operating.

Reason: To protect the amenities of nearby residential and commercial properties.

18. Prior to the commencement of development details of access, any other highway alterations associated with the development and vehicle movements within the site including details of ingress and egress, internal one-way working system and associated signage throughout the site for heavy good vehicles shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented and permanently retained.

Reason: To safeguard the free flow and safety of traffic.

19. Prior to the commencement of development details of the redundant points of access and reinstatement of the verge to make good the footway shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented and permanently retained.

Reason: To provide safe and accessible linkages for pedestrians and cyclists and to preserve the interests of highway amenity.

20. The parking area(s) forming part of the development shall only be used for the parking of private motor vehicles and shall not be used for any

other purpose.

Reason: To ensure that the development complies with Unitary Development Plan Policies and to prevent the introduction of activity which would be detrimental to amenity.

21. During the construction period of the approved development an area shall be maintained within the site for the loading/unloading, parking and turning of delivery, service and construction vehicles.

Reason: To prevent obstruction on the adjoining highways and to safeguard the amenities of surrounding occupiers.

22. The development shall not commence until details of facilities and methodology for cleaning the wheels of construction vehicles leaving the site have been submitted to and approved in writing by the Local Planning Authority. The approved facilities and methodology shall be provided prior to the commencement of site works and shall be used and maintained during the construction period.

Reason: To prevent the transfer of site material onto the public highway in the interests of safety and amenity.

23. The development shall not commence until details of the surfacing materials to be used within the development including footpaths (which shall be 2.0m in width), access roads and parking areas and road markings have been submitted to and approved in writing by the Local Planning Authority. The surfacing shall be carried out in accordance with the approved detail before the development is occupied or use commences.

Reason: To ensure that the development does not prejudice highway safety and a satisfactory appearance.

24. The development shall not commence until plans detailing the existing and proposed ground levels including the levels of any proposed buildings, roads and/or hard surfaced areas have been submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason: To ensure that levels have regard to the level of surrounding development, gradients and surface water drainage.

25. The site shall be enclosed, including site gates, in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The means of enclosure shall be erected in accordance with the approved detail before the development is occupied.

Reason: To ensure satisfactory appearance and safeguard the privacy,

amenity and safety of adjoining occupiers and the public and in the interests of highway safety.

26. The development shall not commence until details of parking and turning facilities, to include the provision of motorcycle parking, to be provided in accordance with the standards adopted by the Local Planning Authority have been submitted to and approved in writing by the Local Planning Authority. The facilities shall be constructed in accordance with the approved details before the development is occupied and shall be maintained for this purpose.

Reason: To ensure that the development complies with Unitary Development Plan Policies and does not prejudice conditions of safety or traffic flow on adjoining highways.

27. The development shall not commence until details of trees, shrubs and grass to be planted on the site have been submitted to and approved in writing by the Local Planning Authority. The planting scheme shall be carried out in accordance with the approved details in the first planting season after completion or occupation of the development whichever is the sooner. Any planting which dies, becomes severely damaged or diseased within five years of planting shall be replaced with new planting in accordance with the approved details.

Reason: To provide a satisfactory appearance and ensure that the development does not prejudice highway safety.

28. The development shall not commence until details of refuse storage facilities including facilities for the recycling of waste to be provided within the development, in accordance with the London Borough of Enfield – Waste and Recycling Planning Storage Guidance ENV 08/162, have been submitted to and approved in writing by the Local Planning Authority. The facilities shall be provided in accordance with the approved details before the development is occupied or use commences.

Reason: In the interests of amenity and the recycling of waste materials in support of the Boroughs waste reduction targets.

29. The development shall not commence until details of the siting, number and design of secure/covered cycle parking spaces have been submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be installed and permanently retained for cycle parking.

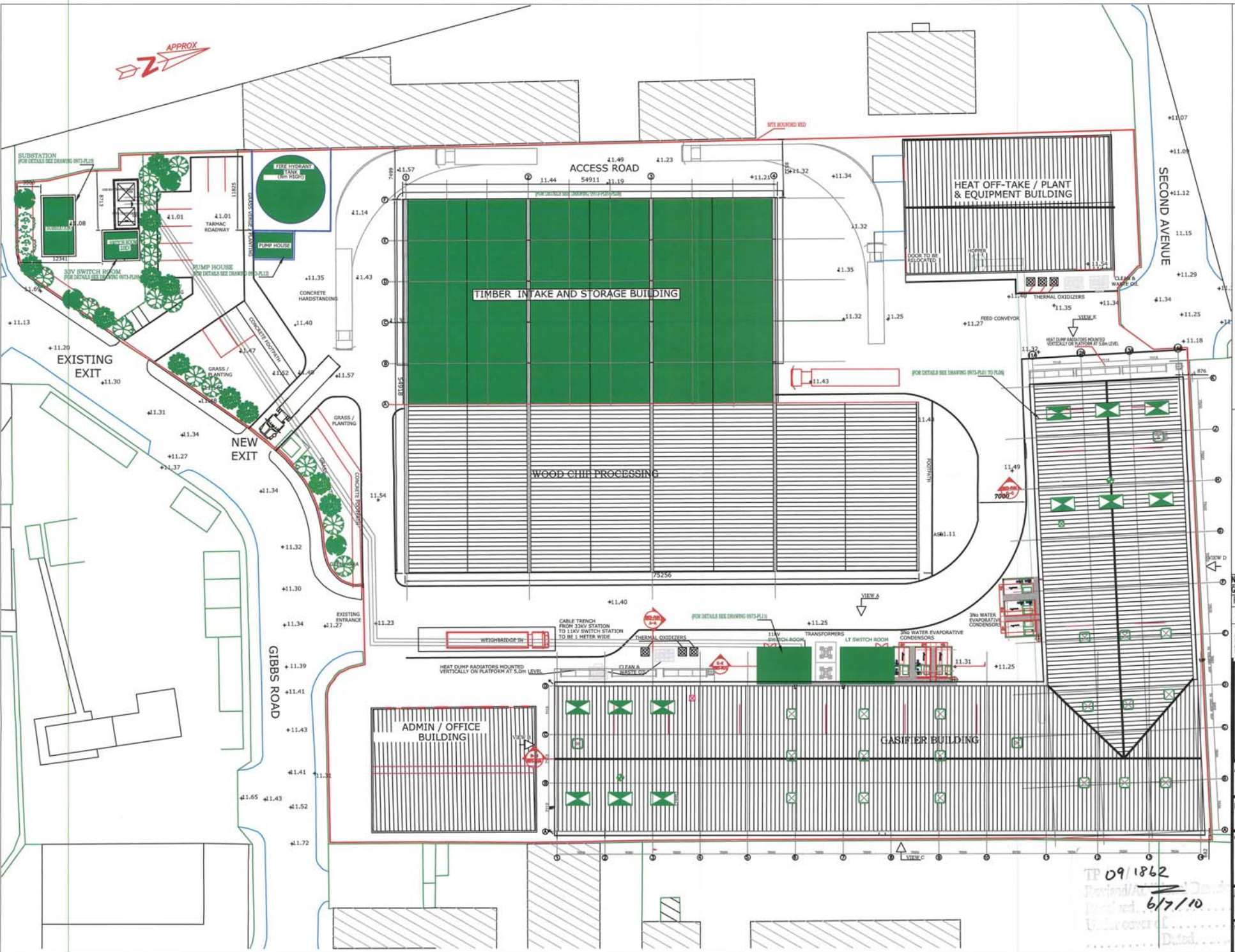
Reason: To ensure the provision of cycle parking spaces in line with the Council's adopted standards.

30. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the decision notice.

Reason: To comply with the provisions of S.51 of the Planning & Compulsory Purchase Act 2004.

8.2 The reasons for granting planning permission are as follows

1. The proposed development will contribute to the provision of renewable energy sources, as well as promoting the development of a decentralised energy network, whilst diverting waste from landfill having regard to Policy (II)EN29 of the Unitary Development Plan, Policies 4A.1, 4A.2, 4A.3, 4A.5, 4A.6, 4A.7, 4A.9, 4A.19, 4A.21, 4A.22, 4A.23, 4A.25 and 4A.26 of the London Plan (2008), Policy CP20 of the emerging Core Strategy, Policies NLWP1, NLWP3 and NLWP4, as well as the wider objectives of, the emerging North London Waste Plan, as well as the objectives of PPS1, PPS10 and the Enfield Renewable Energy and Low Carbon Study (2010).
2. The proposed development would retain land within a Primary Industrial Area within employment use having regard to policies (I)E1, (I)E2, (I)E4, and (II)E2 of the Unitary Development Plan, as well as policies 3B.1 and 3B.4 of the London Plan (2008) and the objectives of PPS1 and PPG4.
3. The proposed development would not detract from the character or visual amenities of the surrounding area or unduly affect the amenities of adjoining or nearby residential or industrial properties having regard to Policies (I)GD1, (I)GD2, (II)GD3, (I)EN6, (II)EN30 and (II)E15 of the Unitary Development Plan, as well as policies 4A.19 and 4A.20 of the London Plan (2008) and the objectives of PPS1, PPS3, PPS4 and PPG24.
4. The proposed development would not give rise to unacceptable on street parking, congestion or highway safety issues, having regard to Policies (II)GD6, (II)GD8 and (II)T13 as well as Policy 3C.23 of the London Plan and the objectives of PPG13.
5. The proposed development would not result in an unacceptable risk of flooding or create an unacceptable risk of flooding elsewhere, having regard to Unitary Development Plan policies (II)GD12 and (II)GD13, as well as policies 4A.12 and 4A.13 of the London Plan 2008 and the objectives of PPS25.



NOTES

LEGEND

- PROPOSED EXTENSIONS
- EXISTING BUILDINGS

NAME REVISED ON BUILDING	C	06-07-10	MOS
GASIFIER BUILDING HATCH REVISED	B	09-02-10	SP
FOR PLANNING	A	14-12-09	MOC
revision	issue	date	by

The copyright of this drawing is vested in the Engineers and it must not be copied or reproduced without their written consent. Figure dimensions only should be taken from this drawing. All Contractors must visit the site and must be responsible for taking and checking all dimensions that relate to this work.

LYNCH & ASSOCIATES
 CONSULTING ENGINEERS & PROJECT MANAGEMENT

The Corner House, South Square, Moormoon, Co. Cork, Ireland
 Phone: (0204)2171 Fax: (0204)2522 Email: info@lynch.ie

client
HOWARD'S CHP ENFIELD

project
GB001A

drawing
SITE PLAN FOR CHP PLANT AT GIBBS ROAD

job no.	drawing no.	date
0973	PL01	27-05-09
scale	drawn by	checked by
1:250	MOC	ABC

TP 09/1862
 Revised/Checked/Drawn/Issue covered/Date

