

Statement to the Examination of the North London Waste Plan Hearing  
session Wednesday 20th November 2019

A. Legal Compliance

Main Matter 1 para (11) Flood Risk

Haringey's non-strategic Draft Flood Risk Assessment 2015, relied on by the plan as evidence (see Appendix A), is inadequate because: -

- a) It is still in draft form and has not been formally adopted.
- b) It is not strategic and fails to identify cross border flood risk areas.
- c) It is not based on up to date climate change predictions.
- d) It was not assessed by the Plan for its compliance with the legal assessment obligations of Para 157 of the NPPF. Particularly with regard to the current and future impacts of climate change on rainfall and flood risk to people and property.
- e) It failed to identify "flood risk elsewhere" from any development of the Pinkham Way site. (see Appendix B)

The Plan's reliance on Haringey's Flood Risk Assessment renders the plan unsound.

Janet Pettitt (Mrs)

Chairman

Freehold Community Association  
Freehold Community Centre  
9 Alexanddra Road  
Muswell Hill  
London  
N10 2EY

A Registered Charity. Registration No. 1025579

B. Soundness

Main Matter 2 para (14) SA climate change & sustainable transport

The SA's failure to identify "waste miles" is a significant factor that undermines its credibility in assessing the climate change impacts of our current waste management delivery system. A simple calculation based on expenditure by the waste authorities on diesel in the North London area would have provided this information.

Camden and Islington are both served by the canal network and it would have been logical to have identified where a joint waste transfer station could have been located to use the canal network to move waste. There are successful waste schemes in London using water transport (see Appendix C)

The reliance of the North London waste management system on the diesel engine is not sustainable and yet the SA has failed to investigate the latest developments in Electric Dustcarts being carried out by Dennis Eagle (see Appendix D). Development offering the introduction of electric vehicles should be a major assessment criteria.

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B. Soundness

Main Matter 3 para (28) Spatial Framework

As was found by the Inspector at Haringey's EIP in 2017 Pinkham Way is of no strategic importance to employment in Haringey and equally it is of no strategic importance to waste management. The attempt by the Plan and Haringey to try to use employment as a way in to waste development on Pinkham Way is scurrilous.

Land use planning is carried on in the public interest and is not to be used to prop up the poor and negligent decision by the North London Waste Authority to spend £12,084,200 purchasing a Site of Importance for Nature Conservation with areas of the site of Metropolitan Importance, that did not even have the benefit of outline planning permission, to build a 300,000 tonne MBT plant. A scheme that ultimately failed along with their procurement plans.

The location of Pinkham Way within the catchment of Summers Lane recycling centre (see Appendix E) is contrary to the plans aims to avoid clusters of facilities in the same area, which will clearly be impacted by increased lorry and car movements using the same road network.

The Pinkham Way site provides no access to other transport modes and air quality on the A406 Pinkham Way is poor with significant traffic congestion affecting it for most of the working day.

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Statement to the Examination of the North London Waste Plan Hearing  
session Thursday 21st November 2019

B. Soundness

Main Matter 5 para (63) Policy 2

The Plan has totally failed to reconcile the environmental impact of a waste development on a 6 Ha Site of Importance for Nature Conservation and MOL.

In its site assessment of the 14 SA tests only 4 were judged to be positive with 10 outcomes either negative or unknown, including the possible destruction of 1500 trees.

The final paragraph of the Plan's site assessment sheet for Pinkham Way reveals fully the inability of the Plan to objectively assess the suitability of the site for development.

"The proposed allocation would have an uncertain impact on the objectives that relate to sustainable transport, flood risk, reducing contributions to climate change and ensuring the efficient use of land and resources."

The inclusion of Pinkham Way in the Plan seriously undermines its soundness in all areas of achieving sustainable development and mitigating the impacts of climate change. Even the Plan's own site selection criteria rule out the inclusion of Pinkham Way as suitable for waste development and it should definitely be removed from the Plan.

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B. Soundness

Main Matter 5 para (68) Policy 2

As the Pinkham Way site will increase flood risk elsewhere it cannot pass the exception test and be allocated and a compliant sequential test cannot overcome this.

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# APPENDIX A

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**From:** "Chairman Freehold Community Association" <freeholdca@gmail.com>  
**To:** "Onslow, Archie" <Archie.Onslow@camden.gov.uk>  
**Sent:** 23 January 2019 08:40  
**Subject:** Strategic Flood Risk Assessment

Dear Mr Onslow,

Would you please supply us with a copy of, or a link to, the SFRA used as evidence for the new NLWP.

We would appreciate a prompt reply.

yours sincerely

Janet Pettitt (Mrs)

Chairman

Freehold Community Association  
Freehold Community Centre  
9 Alexandra Road,  
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Web: [www.freeholdcommunity.org](http://www.freeholdcommunity.org)

A Registered Charity. Registration No. 1025579

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**From:** "Onslow, Archie" <Archie.Onslow@camden.gov.uk>  
**To:** "Chairman Freehold Community Association" <freeholdca@gmail.com>  
**Sent:** 29 January 2019 18:00  
**Subject:** RE: Strategic Flood Risk Assessment

Dear Janet Pettitt

Thank you for your email. All our information on flooding comes from the latest flood maps supplied by the Environment Agency. The flood information for Pinkham Way comes from the Haringey Strategic Flood Risk Assessment (SFRA) 2015. (page 165)  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/2014s1700\\_haringeycouncil\\_sfra\\_apr](https://www.haringey.gov.uk/sites/haringeygovuk/files/2014s1700_haringeycouncil_sfra_apr)

Yours sincerely

Archie Onslow

--

Archie Onslow  
Programme Manager North London Waste Plan

Telephone: 020 7974 5916

---

**From:** Chairman Freehold Community Association <freeholdca@gmail.com>  
**Sent:** 23 January 2019 08:41  
**To:** Onslow, Archie <Archie.Onslow@camden.gov.uk>  
**Subject:** Strategic Flood Risk Assessment

Dear Mr Onslow,

Would you please supply us with a copy of, or a link to, the SFRA used as evidence for the new NLWP.

We would appreciate a prompt reply.

yours sincerely

Janet Pettitt (Mrs)

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---

**From:** "Chairman Freehold Community Association" <freeholdca@gmail.com>  
**To:** "Onslow, Archie" <Archie.Onslow@camden.gov.uk>  
**Sent:** 04 February 2019 09:01  
**Subject:** Plan

Dear Mr Onslow,

Thank you for your reply to our email of 23-01-19.

Could you please confirm that the sites allocated in the NLWP have NOT been subjected to the sequential test.

Also could you provide a link to the Plan's Statement of Common Ground.

We would appreciate a prompt reply.

yours sincerely

Janet Pettitt

Chairman

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Muswell Hill,  
London  
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Tel: 07935-324-578

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---

**From:** "Onslow, Archie" <Archie.Onslow@camden.gov.uk>  
**To:** "Chairman Freehold Community Association" <freeholdca@gmail.com>  
**Sent:** 15 February 2019 09:53  
**Subject:** RE: Plan

Dear Janet Pettitt,

A sequential test has been carried out and the report is on the website on the document centre <http://www.nlwp.net/document-centre/> under the heading Evidence Base (January 2019).

Regarding Statements of Common Ground, there are two sorts and I am not sure which sort you are referring to. One is a statement of common ground that agrees issues that are not in dispute between an objector and a planning authority over a plan or a planning application. We have not got any of those because we have not yet reached that stage.

The other is a new requirement under the 2018 changes to the National Planning Policy Framework for a statement of common ground on cross boundary strategic issues with neighbouring authorities and other relevant organisations. Guidance on the format of these statements has only recently been issued by government. We have been trialing the format and content of these documents with some planning authorities. We will be sending statements of common ground to the planning authorities to whom North London sends a significant amount of waste as part of the consultation on the proposed submission North London Waste Plan. We will adapt these in the light of comments received from the authorities and will publish them as part of the documentation at the submission stage.

Kind regards

--

Archie Onslow  
Programme Manager North London Waste Plan

Telephone: 020 7974 5916

---

**From:** Chairman Freehold Community Association <freeholdca@gmail.com>  
**Sent:** 04 February 2019 09:02  
**To:** Onslow, Archie <Archie.Onslow@camden.gov.uk>  
**Subject:** Plan

Dear Mr Onslow,

Thank you for your reply to our email of 23-01-19.

Could you please confirm that the sites allocated in the NLWP have NOT been subjected to the sequential test.

Also could you provide a link to the Plan's Statement of Common Ground.

We would appreciate a prompt reply.



**VOLUMETRIC RUN OFF AND MODELLING FOR  
LAND AT PINKHAM WAY A406  
AND ASSESSMENT OF THE LEGAL  
FRAMEWORK FOR RISK**

## APPENDIX B

Calculation of annual volumetric runoff from potential development of the Pinkham Way site into the Lower Lea river network and beyond to the Thames Barrier.

Because the Sustainability Appraisal of the North London Waste Plan has failed to identify the quantum or scale of development that may be possible on the Pinkham Way site calculations have been based on three possible scenarios.

Based on climate data published by Köppen and Geiger the combined annual average rainfall for the Finchley and Muswell Hill areas is 656mm.

From this figure three possible calculations can be made based on three possible developed site areas.

- a) A unit area of 1 ha.
- b) The area owned by the North London Waste Authority 4.1 ha.
- c) The total site area as indicated in the Plan's Sustainability Appraisal 5.9 ha.

Calculation a)

$10,000 \text{ sqm} \times 0.656\text{m} = 6,560 \text{ cum annual volumetric runoff.}$

20% Uplift for Environment Agency predicted climate change increase in rainfall over the next 30 years = 7,872 cum annual volumetric runoff by 2050.

Calculation b)

$41,000 \text{ sqm} \times 0.656\text{m} = 26,896 \text{ cum annual volumetric runoff.}$

20% Uplift for Environment Agency predicted climate change increase in rainfall over the next 30 years = 32,275.2 cum annual volumetric runoff by 2050.

Calculation c)

$59,000 \text{ sqm} \times 0.656\text{m} = 38,704 \text{ cum annual volumetric runoff.}$

20% Uplift for Environment Agency predicted increase in rainfall over the next 30 years = 46,444.8 cum annual volumetric runoff by 2050.

Conclusion

As evidenced in our 2014 report, the Pinkhamway site makes no contribution to volumetric flows in the Bounds Green Brook or the Lower Lee river network and there is no justifiable "greenfield runoff" from the site entering the system. It is providing a high level of protection to the various Flood Zones identified in the Environment Agency's 2013 report "Managing flood risk in the Lower Lee catchment, today and in the future." and is capable of absorbing the predicted climate change uplift in rainfall to 2050 safely and without increasing the causes and impacts of flooding elsewhere.

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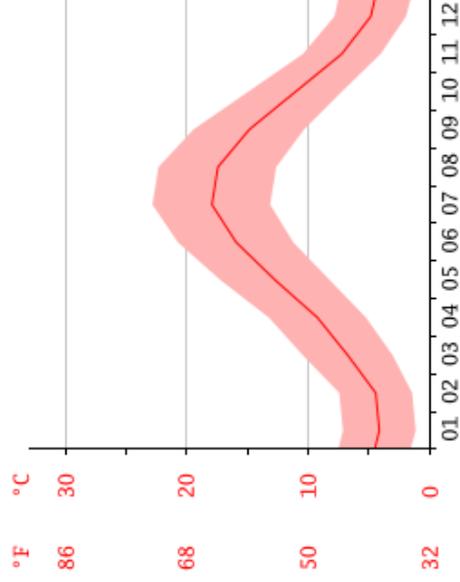
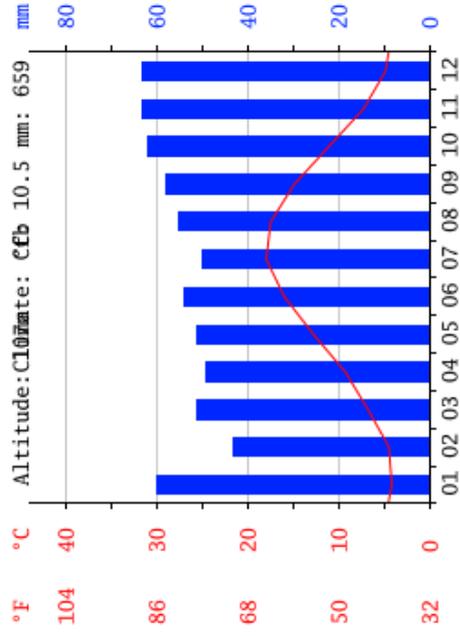
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## CLIMATE MUSWELL HILL



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>> [Muswell Hill average temperature](#)

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India

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The climate in Muswell Hill is warm and temperate. Muswell Hill is a city with a significant rainfall. Even in the driest month there is a lot of rain. According to Köppen and Geiger, this climate is classified as Cfb. The average annual temperature is 10.5 °C in Muswell Hill. About 659 mm of precipitation falls annually.

Ewaso Ngiro
Rome
Christchurch
Ilorin
Vijayawada
Shiv Khori
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## CLIMATE GRAPH // WEATHER BY MONTH MUSWELL HILL

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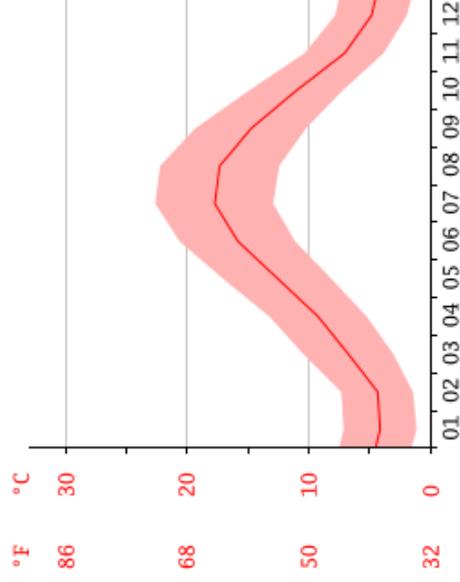
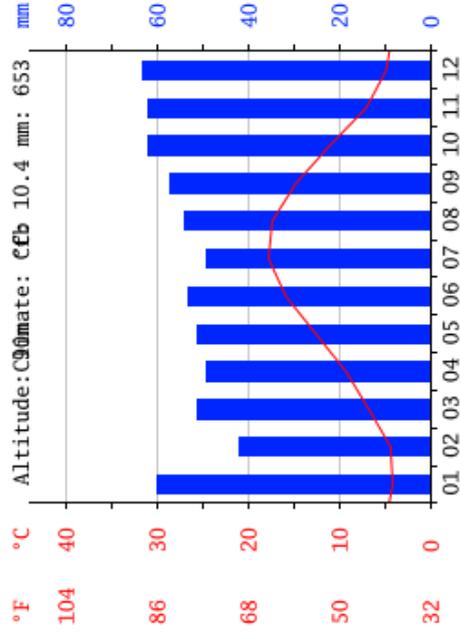
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## CLIMATE FINCHLEY



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>>[Finchley Weather by month // weather averages](#)

The climate is warm and temperate in Finchley. The rainfall in Finchley is significant, with precipitation even during the driest month. This location is classified as Cfb by Köppen and Geiger. The average annual temperature is 10.4 °C in Finchley. In a year, the average rainfall is 653 mm.

Ewaso Ng'iro
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X

## CLIMATE GRAPH // WEATHER BY MONTH FINCHLEY

Calculation of possible post development volumetric runoff from the Pinkham Way site, employing an attenuation SuDS system, into the Lower Lee river network and beyond to the Thames Barrier.

Current SuDS design standards require attenuation of storms with a 1-100 recurrence interval or 1% probability of occurring in any one year and a climate change uplift of 30%

The generally accepted minimum flow rate restriction from an attenuation system is currently 5 litres per second or 0.005 cumecs.

Based on this we have modelled the required volume of on site storage requirements for potential development of 1 Ha, 4.1 Ha and 5.9 Ha on the Pinkham Way site. However, the volume calculations also represent the volume of water that will be added to the Bounds Green Brook and the Lower Lee river network over a time period dictated by the allowed discharge. The results of the modelling are shown over the page and the optimum storms and volumes for each area are highlighted in red.

## Conclusion

For run 1 (1 Ha of developed site) the attenuation system will be discharging 612 cum at a rate of 18 cum per hour over a period in excess of 34 hours into the Lower Lee network. With climate change 873 cum will be discharged over a period in excess of 48.5 hours.

For run 2 (4.1 Ha of developed site) the attenuation system will be discharging 3312 cum at a rate of 18 cum per hour over a period in excess of 184 hours into the Lower Lee network. With climate change 4306 cum will be discharged over a period in excess of 239 hours.

For run 3 (5.9 Ha of developed site) the attenuation system will be discharging 4766 cum at a rate of 18 cum per hour over a period in excess of 265 hours into the Lower Lee network. With climate change 6196 cum will be discharged over a period in excess of 344 hours.

Because flow controls do not operate with a constant flow over head characteristic the predicted discharge periods shown are conservative. Also the risk of attenuation systems being impacted by multiple storms over lengthy drain down periods and causing on site flooding is significant. Equally, attenuation systems can continue to contribute for many days to multiple storm events affecting the river network and increase risks in identified downstream flood zones.

Site identifier : Pinkham Way

Client : FCA

Date of run : 07-09-19 Run by : CDF

M5 - 60 =	20	r = .42	Area (m2)	10000	Allowed Discharge l/s	5.000	0.005			
						M30				
Duration	M5	In Cu m	Out	Store	Duration			In Cu m	Out	Store
5	7.828	78.280	1.5	<b>76.780</b>	5			111.720	1.5	<b>110.220</b>
10	10.918	109.180	3	<b>106.180</b>	10			159.000	3	<b>156.000</b>
15	13.184	131.840	4.5	<b>127.340</b>	15			194.560	4.5	<b>190.060</b>
30	16.686	166.860	9	<b>157.860</b>	30			247.860	9	<b>238.860</b>
60	20.600	206.000	18	<b>188.000</b>	60			308.000	18	<b>290.000</b>
120	24.720	247.200	36	<b>211.200</b>	120			367.200	36	<b>331.200</b>
240	29.252	292.520	72	<b>220.520</b>	240			431.680	72	<b>359.680</b>
360	32.342	323.420	108	<b>215.420</b>	360			474.140	108	<b>366.140</b>
600	35.496	354.960	180	<b>174.960</b>	600			518.520	180	<b>338.520</b>
1440	44.064	440.640	432	<b>8.640</b>	1440			630.720	432	<b>198.720</b>
						M100+30%				
Duration	M100	In Cu m	Out	Store	Duration			Rainfall	Out	Store
5	13.072	130.720	1.5	<b>129.220</b>	5			169.936	1.5	<b>168.436</b>
10	18.338	183.380	3	<b>180.380</b>	10			238.394	3	<b>235.394</b>
15	23.808	238.080	4.5	<b>233.580</b>	15			309.504	4.5	<b>305.004</b>
30	32.400	324.000	9	<b>315.000</b>	30			421.200	9	<b>412.200</b>
60	40.600	406.000	18	<b>388.000</b>	60			527.800	18	<b>509.800</b>
120	48.240	482.400	36	<b>446.400</b>	120			627.120	36	<b>591.120</b>
240	56.516	565.160	72	<b>493.160</b>	240			734.708	72	<b>662.708</b>
360	61.230	612.300	108	<b>504.300</b>	360			795.990	108	<b>687.990</b>
600	67.164	671.640	180	<b>491.640</b>	600			873.132	180	<b>693.132</b>
1440	80.784	807.840	432	<b>375.840</b>	1440			1050.192	432	<b>618.192</b>



Site identifier : Pinkham Way

Client : FCA

Date of run : 07-09-19 Run by : CDF

M5 - 60 =	20	r = .42	Area (m2)	59000	Allowed Discharge l/s	5.000	0.005			
						M30				
Duration	M5	In Cu m	Out	Store	Duration			In Cu m	Out	Store
5	7.828	461.852	1.5	<b>460.352</b>	5	11.172	659.148	1.5	<b>657.648</b>	
10	10.918	644.162	3	<b>641.162</b>	10	15.900	938.100	3	<b>935.100</b>	
15	13.184	777.856	4.5	<b>773.356</b>	15	19.456	1147.904	4.5	<b>1143.404</b>	
30	16.686	984.474	9	<b>975.474</b>	30	24.786	1462.374	9	<b>1453.374</b>	
60	20.600	1215.400	18	<b>1197.400</b>	60	30.800	1817.200	18	<b>1799.200</b>	
120	24.720	1458.480	36	<b>1422.480</b>	120	36.720	2166.480	36	<b>2130.480</b>	
240	29.252	1725.868	72	<b>1653.868</b>	240	43.168	2546.912	72	<b>2474.912</b>	
360	32.342	1908.178	108	<b>1800.178</b>	360	47.414	2797.426	108	<b>2689.426</b>	
600	35.496	2094.264	180	<b>1914.264</b>	600	51.852	3059.268	180	<b>2879.268</b>	
1440	44.064	2599.776	432	<b>2167.776</b>	1440	63.072	3721.248	432	<b>3289.248</b>	
						M100+30%	Rainfall			
Duration	M100	In Cu m	Out	Store	Duration			In Cu m	Out	Store
5	13.072	771.248	1.5	<b>769.748</b>	5	16.994	1002.622	1.5	<b>1001.122</b>	
10	18.338	1081.942	3	<b>1078.942</b>	10	23.839	1406.525	3	<b>1403.525</b>	
15	23.808	1404.672	4.5	<b>1400.172</b>	15	30.950	1826.074	4.5	<b>1821.574</b>	
30	32.400	1911.600	9	<b>1902.600</b>	30	42.120	2485.080	9	<b>2476.080</b>	
60	40.600	2395.400	18	<b>2377.400</b>	60	52.780	3114.020	18	<b>3096.020</b>	
120	48.240	2846.160	36	<b>2810.160</b>	120	62.712	3700.008	36	<b>3664.008</b>	
240	56.516	3334.444	72	<b>3262.444</b>	240	73.471	4334.777	72	<b>4262.777</b>	
360	61.230	3612.570	108	<b>3504.570</b>	360	79.599	4696.341	108	<b>4588.341</b>	
600	67.164	3962.676	180	<b>3782.676</b>	600	87.313	5151.479	180	<b>4971.479</b>	
1440	80.784	4766.256	432	<b>4334.256</b>	1440	105.019	6196.133	432	<b>5764.133</b>	

## Legal Framework for Risk

Neutral Citation Number: [2011] EWCA Crim 2015 Case No: 201002020 D2  
201004882 B2

IN THE COURT OF APPEAL (CRIMINAL DIVISION) ON APPEAL FROM  
BOURNEMOUTH CROWN COURT, MAIDSTONE CROWN COURT

Tangerine Confectionery Ltd and Veolia ES (UK) ITD Appellants  
- and -  
The Queen Respondent

Under flood risk policies contained in the NPPF plan makers and planning authorities are legally obliged to identify people who's safety may be affected by flood risk occurring elsewhere from a proposed site allocation or development proposal. Equally, they are legally obliged to assess what the risk maybe as well as the potential severity of the risk.

However, under Section 3 (1) of the Health and Safety at Work Act 1974 plan makers and planning authorities have a legal duty not to introduce or increase risk to people "not in their employ" who's health or safety may be affected by their undertaking and Section 3(b) of The Management of Health and Safety at Work Regulations 1999 imposes a legal duty on plan makers and planning authorities to make a "suitable and sufficient assessment of the risks to the health and safety of persons not in his employment...."

Failure to comply with both these duties occasions the committing of criminal offences and it does not require the foreseen risk event to happen for criminal offences to have been committed.

Section 40 of the Health and Safety at Work Act 1974 places, on a duty holder, a reverse onus of proof to show that "it was not practicable or not reasonably practicable to do more than was in fact done to satisfy the duty or requirement."

It is clear that the NPPF flood risk policies fully reflect the above health and safety duties for the seven Boroughs and their planners. They have failed to carry out these duties and have misdirected or misunderstood the flood risk policies in the NPPF taken as a whole. They have failed to document or demonstrate a proper understanding of the wording in paras. 155, 157, 160 and 163 requiring identification of "flood risk elsewhere" and have ignored Para 161 which clearly prohibits the allocation or permitting of development that will increase flood risk elsewhere.

The foreseeable risk from a flood, emanating from the Bounds Green Brook, to drivers and pedestrians using the Pinkham Way road tunnel and to workers and visitors to the Alan Day Auto Centre would clearly be increased by any volumetric run off from the Pinkham Way site and it's allocation in the North London Waste Plan is in breach of NPPF policy and health and safety legislation.

## APPENDIX C

Dennis Eagle to introduce fully electric bin lorry, the eCollect  
17 May 2018  
Hayley Pink  
Product

Dennis Eagle has showcased a fully electric bin lorry at the IFTA exhibition in Munich this week, created for zero-emission urban refuse collection.

The eCollect will initially be available to buy in a 26-tonne, 6x2 rear-steer narrow (2.25m wide) configuration, with a 19m<sup>3</sup> narrow rear loading body and automatic split-bin lift.

It is due to go into production in the middle of 2019, with the first units anticipated to be on the roads with early customers from the third quarter.

Lee Rowland, sales and marketing manager at Dennis Eagle, said the new eCollect will be the first OEM-built complete electric RCV, which has been receiving a "great response at the IFTA exhibition".

He told CM that between now and the start of production, the company will be working closely with select customers to help refine the product and understand how it can fit with their operational requirements.

The vehicle will also undergo testing and technical verification to optimise battery management software.

Rowland said the eCollect is expected to be popular with urban operators needing a zero-emission vehicle for air pollution hotspots and clean air zone restrictions.

He added it may enable operators to consider more night-time delivery patterns, for example, thanks to the low-noise, electric technology.

Aside from replacing the diesel engine with an electric drive system, Dennis Eagle said it has made minimal changes to the vehicle design, helping to ensure ease of maintenance, as well as product familiarity with drivers and crews.



## **WRWA**

In 2002, Cory Environmental began a 30-year contract to handle all aspects of waste management for the London Boroughs of Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea. As part of the contract, Cory took over the responsibility for the operation of the Smugglers Way Transfer Station in Wandsworth and Cringle Dock in Battersea where the municipal waste and recyclables are delivered. The waste is then packed into sealed containers, loaded onto barges and transported down the river.

## **Corporation of London**

Cory Environmental operates Walbrook Wharf in the City of London as part of the company's long-term waste disposal contract with the Corporation of London. When the company took on the contract it had to significantly invest in the handling equipment at the wharf and the barges; converting facilities to handle containerised waste. The Corporation's rubbish is delivered to the waste transfer station at Walbrook Wharf and loaded onto barges which are towed downstream to Essex.

## **London Borough of Tower Hamlets**

Cory provides lighterage and disposal services under contract to Cleanaway, who operate the transfer station.

## **Mucking Landfill site and Belvedere Power Station**

Cory's operation of the Mucking Landfill site was due to finish at the end of 2007 as it was planned that the waste will be used as fuel for the proposed Energy-from-Waste plant at Belvedere adjacent to the river in the London Borough of Bexley.

The planning permission for the plant was delayed (even though an application was submitted in 2000 a decision was only granted in June 2006). The company was granted an extension to continue the life of the Mucking Landfill site for the disposal of its waste until 2010. This is good news for water transport as the service is maintained and the Energy-from-Waste plant will become operational at that time.

The reduction in tonnage being received at Mucking for the extra three years will reduce the intensity of the operations there.

When the Belvedere Power Station begins commissioning it will generate 66 MW of electricity from the waste diverting, on average, 585,000-tonnes a year from

landfill. This will prevent fossil fuels from being quarried, transported by road and used to power the plant.

### **Recycling**

Cory is exploring the potential to divert some recyclable materials handled on site from road to water transport but this will be dependent on the development of reprocessing facilities downriver.

**Malcolm Ward**, Chief Executive Officer, Cory Environmental said:

“Cory has a long history of successfully transporting large amounts of London’s waste by water and we are planning to continue to do so for the next 30 years. Water transport is a vital component of our logistics chain and it benefits the environment, the London community and society in general.”

# APPENDIX E

