GREATERLONDONAUTHORITY

GLA/4509/LIR

20 May 2019

Riverside Energy Park, Belvedere

Planning Inspectorate reference: EN010093

National Infrastructure Project Development Consent Order application, Local Impact Report
Development Consent Order, Section 90 of Planning Act 2008

Proposed development

Cory Environmental Holdings Limited is proposing to develop 'an integrated multi-technology Riverside Energy Park (REP) in Bexley including an Energy Recovery Facility (ERF), Anaerobic Digestion Facility, Solar Panels, Battery Storage and electrical connection route'.

As the Riverside Energy Park would have an electricity generating capacity over 50MWe, it is classified as a Nationally Significant Infrastructure Project under section 14(1)(a) and section 15(2) of the Planning Act 2008.

Strategic impacts and summary

- **Energy:** Mayoral policy supports the development of renewable energy and heat networks as part of the transition to a low carbon economy and sets out the need for clear commitments from developers. Mayoral policy supports anaerobic digestion and solar PV.

- **Carbon:** Mayoral policy requires all new energy from waste (EFW) facilities to comply with the carbon intensity floor (CIF) policy. New energy from waste development can only meet the current CIF by being highly efficient and exporting heat.

- **Waste:** Mayoral policy is to effectively implement the waste hierarchy and accelerate the transition to a low carbon circular economy. Reducing waste and maximising reuse and recycling is essential as part of the transition to the circular economy. Energy from waste facilities require pre-treatment of waste feedstock to ensure that recyclable waste is not incinerated.

- **Energy from waste capacity:** The draft London Plan is clear that there is no requirement for additional EfW capacity to manage London's residual waste. A review of wste plans produced by neighbouring regional authorities shows that there is no need for additional EFW capacity to manage their residual waste. Overprovision of EfW capacity risks obstructing the aim of managing waste further up the waste hierarchy.

- **Transport:** Mayoral policy seeks to maximise the use of river transport. There is no commitment in the application to do so.
- **Air quality:** Reducing the impact of development on air quality is a fundamental requirement of London's ambition for a cleaner, healthier city.
- **Requirements:** The GLA has identified a number of Requirements without which no consent should be issued, including: use of river transport; pre-treatment of waste to remove recyclables; limiting emissions to limits assessed in BREF; commitment to skills training; commitment to developing the AD plant, PV panels and battery storage; and sufficient measures to address flood risk and biodiversity. Other issues are identified that the GLA considers should be considered further include: commitment to CHP delivery, including investment in heat off-take infrastructure; the export of gas from the anaerobic digestor; road deliveries to have zero pollution**;** payment of the London Living Wage.

1. Context

1.1. The applicant, Cory Environmental Holdings Limited (trading as Cory Riverside Energy) (hereafter 'Cory' or 'the Applicant'), is applying for a Development Consent Order under the Planning Act 2008 for the development of Riverside Energy Park (REP). A Development Consent Order (DCO) is required where a scheme is considered to be a Nationally Significant Infrastructure Project (NSIP). The NSIP threshold for energy generating facilities is 50 megawatts. The proposed application includes an Energy Recovery Facility (ERF) and Anaerobic Digestion facility that will have an electrical output of greater than 96 megawatts (MW), which, therefore, exceeds the threshold to qualify as an NSIP. NSIP applications are assessed by the Planning Inspectorate, on behalf of the Secretary of State, who will issue a decision on the application.

1.2. The proposed REP is situated in the London Borough of Bexley (LBB). The electrical connection to the national grid will also affect land within Dartford Borough Council (DBC).

1.3. The Mayor of London is a statutory consultee, under the Planning Act. On 30 July 2018, in accordance with Section 42 of the Planning Act, the GLA responded to the Section 42 consultation, both of which can be found on the GLA website1. The response set out the Mayor's reasons for objecting to the proposed REP.

[1] https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions (using reference '4509')

1.4. The GLA provided commentary on the Adequacy on 5 December 2018, after being granted an extension from 30 November to 5 December by the Planning Inspectorate; this letter confirmed that, whilst various meetings have been held with the Applicant, there were no agreed sets of minutes from these meetings. The application for a DCO was submitted to the Planning Inspectorate on 16 November 2018 and was accepted by the Inspectorate on 19 December 2019. The GLA submitted a Relevant Representation to the Inspectorate on the 12 February 2019 setting out the Mayor's objections to the proposed REP.

1.5. The Mayor is also responsible for strategic transport matters in London. Transport for London (TfL) is the Mayor's strategic transport body and is concerned with effects on the strategic road network (SRN). TfL submitted Relevant Representations to the Inspectorate on 12 February 2019.

1.6. This Local Impact Report (LIR) informs the Examining Authority (ExA) of the strategic impacts and policies affected by the proposed REP with regard to the development plan for London and other relevant London policies and strategies and incorporates issues relevant to TfL. For the avoidance of doubt, TfL and the GLA are fully aligned and TfL subscribes to the views within this document with regard to transport issues.

1.7. As noted above, the proposed development falls within the administrative areas of LBB and DBC and it is expected that these local planning authorities will consider their respective local impacts, policies and designations. Accordingly, this LIR does not aim to provide a comprehensive overview, rather it provides a strategic review of the local impacts. Further, it is expected that LBB will provide information regarding a description of the site and its surroundings, relevant planning history and commentary on the key characteristics of the area, and this LIR does not seek to duplicate that. This response is confined to issues that are considered to be of strategic importance to the Mayor for the implementation of national and local energy and waste policy, and issues relating to transport and air quality, within the Greater London area or parts of it. For this reason, the structure of this LIR does not follow the 'Content of the LIR' headings in Advice Note 12, but instead comprises the following:

- Section 2 – relevant policies and strategies
- Section 3 – project description
- Section 4 – surrounding area
- Section 5 - energy
- Section 6 - carbon
- Section 7 - waste
- Section 9 - transport

[2] Planning Inspectorate, 2012: Local Impact Reports

- Section 9 – air quality

- Section 10 - commentary on DCO requirements

2. Relevant policies and strategies

2.1. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Bexley Core Strategy (2012), Saved Policies of the Unitary Development Plan (2007) and the 2016 London Plan (Consolidated with Alterations since 2011). The National Planning Policy Framework (NPPF) states that planning applications must be determined in accordance with the development plan. The London Plan legally forms part of each London Borough's development plan. It is, however, acknowledged that applications for NSIPs are determined under the Planning Act 2008, primarily guided by National Policy Statements but with regard to the development plan and the policies and evidence contained within. The development plan and other local policy documents are capable of being a material consideration that should be taken into consideration by the Secretary of State when determining the DCO application.

2.2. The London Plan comprises the key strategic spatial policy for Greater London and was adopted in March 2016 under the previous administration.

2.3. The Mayor's draft London Plan was first published for consultation in December 2017. Preparation of the draft London Plan, which will in due course replace the existing 2016 London Plan, is well advanced and the Examination in Public concludes on 22 May 2019. The draft London Plan is a material consideration in planning decisions in London. The significance given to it is a matter for the decision maker, but it gains more weight as it moves through the process to adoption. The version referred to in this LIR is the Draft London Plan showing minor suggested changes published August 2018, as amended through Further Suggested Changes, proposed in response to the Inspector's matters and/or discussions during the examination session; these are all available to view on the GLA's website.

2.4. The draft London Plan has attracted only limited objection to the strategic policies relevant to the proposed REP, including energy and waste. The principles of the energy, waste and air quality policies in the draft London Plan were broadly supported, although many of the consultation responses suggested that they should be tighter. These are referred to, where appropriate, in the relevant sections.

2.5. The Mayor's London Environment Strategy (LES) was published in May 2018. It is an integrated strategy that brings together every aspect of London's environment including air quality, waste, climate change mitigation and energy, and the low carbon circular economy. The LES was adopted following an extensive programme of consultation with technical stakeholders and the public and was the subject of an Integrated Impact Assessment (IIA).

3. Project description

3.1. The following project description is taken from the Applicant's Planning Statement (Document 7.1). The GLA has not identified any strategic issues with regard to the proposed grid connection, and therefore the description below details only the REP and REP operations.

"Riverside Energy Park
The Riverside Energy Park (REP) would be constructed on land immediately adjacent to Cory's existing Riverside Resource Recovery Facility (RRRF), within the London Borough of Bexley (LBB), and is described in the DCO application as being complementary to the operations of the existing RRRF. It would comprise an integrated range of technologies including: waste to energy recovery (within an Energy Recovery Facility - ERF), Anaerobic Digestion, solar panels and battery storage. The main elements of REP are described within the Applicant's DCO application (document 7.1 Planning Statement) as follows:

- *Energy Recovery Facility: to provide thermal treatment of Commercial and Industrial (C&I) residual (non-recyclable) waste with the potential for treatment of (non-recyclable) Municipal Solid Waste (MSW);*
- *Anaerobic Digestion facility: to process largely food and some green waste. Outputs from the Anaerobic Digestion facility would be transferred off-site for use in the agricultural sector as fertilizer or as an alternative, where appropriate and once dewatered, used as a fuel in the ERF to generate electricity;*
- *Solar Photovoltaic Installation: to generate electricity. Installed across a wide extent of the roof of the Main REP Building;*
- *Battery Storage: to store and supply additional power to the local distribution network at times of peak electrical demand. This facility would be integrated into the Main REP building; and*
- *On Site Combined Heat and Power (CHP) Infrastructure: to provide an opportunity for local district heating for nearby residential developments and businesses. REP would be CHP enabled with necessary onsite infrastructure included within the REP site".*

"Riverside Energy Park operations

The operations of the REP are described within the DCO application as follows:

- *Delivery of waste to REP: the majority of waste would be delivered to REP by barge from Waste Transfer Stations (WTS) along the River Thames, utilising the existing jetty which is located immediately to the north of RRRF and the REP site. Whilst CRE [Cory] is a river-based operator, the application includes flexibility to allow deliveries by road where commercially and environmentally appropriate to do so, e.g. for local waste deliveries from the Bexley area or for food/green waste; and*
- *Removal of by-products from REP: Incinerator Bottom Ash (IBA) would be transported by river to the existing IBA Facility at the Port of Tilbury for treatment/recycling, and then for onward use as secondary aggregate in the construction sector. Air Pollution Control Residues (APCR) would be taken off-site by road in sealed containers to be treated/recycled for use as a construction material".*

4. Surrounding Area

4.1. Whilst the Bexley Local Impact Report is expected to set out the specific local context, there are various strategic designations surrounding the site which are of relevance to note.

4.2. The site lies within Strategic Industrial Land and is served by a safeguarded wharf, known as Borax Wharf / Manor Wharf. The adjacent Crossness Nature Reserve is designated Metropolitan Open Land.

4.3. In addition to site specific strategic designations, the site lies in close proximity to the Thamesmead and Abbey Wood Opportunity Area, which lies to the west of the site and is anticipated to accommodate up to 8,000 new homes and 4,000 new jobs. To the north of the river, lie the Royal Docks and Beckton Opportunity Area, where up to 30,000 new homes are expected and up to 41,500 new jobs, and the London Riverside Opportunity Area, which would seek to provide up to 44,000 new homes and 29,000 new jobs.

5. Energy

5.1. This section identifies relevant policy for London with regard to energy generation. London's energy policies are based on the national policy requirement that the planning system should support the Government's key goals on carbon emission reductions, energy security, affordability, and the transition to a low carbon future, in particular supporting renewable and low carbon energy. Only energy from renewable, i.e. non-fossil, sources can be considered renewable.

London Plan

5.2. Under the Mayor of London Act (2008) the Mayor has a legal responsibility to address climate change. The Mayor's principle vehicles for addressing climate change and energy issues are the London Plan (including the draft London Plan) and the London Environment Strategy (LES).

5.3. The London Plan 2016 sets out a vision for sustainable development over the years to 2036 and beyond, that London should "excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change".

5.4. Of the six detailed objectives that support this vision, the following is directly relevant: "A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively".

5.5. Chapter 5 of the London Plan is concerned with climate change including energy, waste and carbon. Policy 5.1 sets out the Mayor's target of achieving an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025.

5.6. The London Plan recognises the value of localised decentralised energy (DE) heat and power networks to help achieve this target: Policy 5.5 Decentralised Energy Networks prioritises the development of decentralised heating and cooling networks at both development and area wide levels, including larger scale heat transmission networks.

5.7. Paragraph 5.32 of the London Plan makes clear that "renewable energy DE opportunities including the use of energy from waste and biomass schemes are also supported" as part of a network of supply supported by planned development.

5.8. Whilst the DCO application appears to conform with the principles of DE set out in the London Plan, it does not provide any evidence that the proposed ERF would be supported by planned development as required by the London Plan. Furthermore, the application does not provide evidence to demonstrate that there would be sufficient foreseeable heat demand in the local area for the proposed ERF to operate as an effective CHP plant. Further details are provided in the GLA's Written Representations (WR 1 Heat Offtake).

5.9. Policy 5.7 Renewable Energy seeks to increase the proportion of energy generated from renewable sources. The proposed Anaerobic Digestion facility and solar PV panels would provide renewable energy and are consistent with this policy. The GLA does not consider that the ERF is consistent with this policy since the waste feed-stock that fuels the ERF is only partially renewable. This issue is addressed further in the GLA's written representations WR2 Renewable Energy).

5.10. To comply with Policy 5.7 regarding generation from renewable sources, the application would need to demonstrate that the principal energy-generating element of the REP, the ERF, would generate energy from renewable sources. The application does not contain information regarding the composition of the waste feedstock for the ERF that would allow compliance with this policy to be assessed. The GLA has provided data to allow such assessment within the Written Representation (WR 2 Renewable Energy). On the understanding[3] that the composition of feedstock processed at the ERF includes will be circa 50% biogenic material, the proportion of generated energy which qualifies as renewable may be less than 50%.

5.11. Paragraph 5.39 of the London Plan states that energy generated from waste provides a particularly significant opportunity for London to exploit in the future. The Plan requires that "preference should be given to using advanced conversion technologies including anaerobic digestion, gasification and pyrolysis (see glossary) that have the potential to achieve greater efficiencies and carbon dioxide emissions savings". Consequently, whilst the Anaerobic Digestion element of the REP is in conformity with this policy, the proposed ERF is not an advanced conversion technology and is not a preferred option.

[3] Based on the Applicant's assessment of waste composition at paragraph 3.2.5 of Document 7.2: The Project and its Benefits Report states that a waste composition analysis undertaken for the existing RRRF (undated) shows a biogenic fraction of around 50%.

Draft London Plan

5.12. The new London Plan marks a break with previous London Plans, represents a step-change in the approach to development and sustainable, inclusive growth. Nevertheless, the draft London Plan confirms many of the strategic themes set out in the London Plan with regard to energy, carbon and waste.

5.13. Chapter 9 of the draft London Plan addresses sustainable infrastructure, including energy. Policy SI2 Minimising greenhouse gas emissions includes a requirement for all major development to be net zero carbon in line with the energy hierarchy in which the priority is to minimise energy demand, and then address how energy will be supplied and renewable technologies incorporated. Paragraph 9.2.3 encourages all developments to maximise opportunities for on-site electricity and heat production, including solar technologies.

5.14. Policy SI3 Energy infrastructure includes a requirement for boroughs and developers "to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development". The Policy is largely focused on planning for onsite energy infrastructure for new developments, such as universities, hospitals and social housing, but in general terms the draft London Plan is supportive of opportunities for energy generation, energy storage and heating and cooling networks.

5.15. Part D of Policy SI3 states:

"Major development proposals within Heat Network Priority Areas should have a communal ***low-temperature*** *heating system*

1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:

a) connect to local existing or planned heat networks

b) use- ***zero-emission or*** *local secondary heat sources (in conjunction with heat pump, if required*

e) use low-emission combined heat and power (CHP) ***(only where there is a case for CHP to enable the delivery of an area-wide heat network)***

f) use ultra-low NOx gas boilers.

2) CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that ***they meet the requirements of policy SI1 (A)***

3) where a heat network is planned but not yet in existence the development should be designed for connection at a later date."

5.16. The GLA's publicly-available London Heat Map identifies where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers. These areas are called Heat Network Priority Areas in the latest version of the Heat Map which was updated in December 2017 (previously called 'areas of decentralised energy potential').

5.17. A recently-completed heat network study [4] (May 2019) carried out for LBB and funded by the GLA concluded that the anticipated heat demand in the Thamesmead and Belvedere area could be met entirely by the existing RRRF. The study looked at the current and forecast heat loads within a feasible distance of the RRRF plant and concluded that the projected heat demand in the area could be met entirely by the existing RRRF. Further details of the existing heat supply from RRRF and projected heat demand are provided in the GLA's Written Representations (WR1 Heat Offtake).

5.18. Paragraph 9.3.7 supports increasing the amount of renewable energy; this includes the use of solar PV. The provision of solar PV power as proposed in the application is, therefore, supported by draft Local Plan policy.

5.19. Paragraph 9.3.11 states that "Land will be required for energy supply infrastructure including energy centres. These centres can capture and store energy as well as generate, supply and distribute it. The ability to efficiently store energy could reduce overall energy consumption, reduce peak demand and make renewable energy more effective". The proposed energy storage element of the REP is in conformity with the draft London Plan in this regard.

London Environment Strategy (LES)

5.20. The LES is the first integrated environment strategy for London and combines policy with an action plan for five years. It addresses key environmental challenges including air quality, greenhouse gas (GHG) emissions, and waste.

5.21. Objective 6.2 of the LES is concerned with the need to transform the energy system so that power and heat for buildings and transport is generated from clean, local and renewable sources, such as solar and waste heat. Under the Greater London Authority Act 2007, the Mayor has a statutory duty to contribute towards the mitigation of, and adaptation to, climate change in the UK. For this reason, the LES is concerned with how London can best contribute to the national climate change agenda.

[4] Thamesmead and Belvedere Heat Network Feasibility Study: Work Package 1, London Borough of Bexley, May 2019

5.22. The Mayor has a statutory duty to set out policies and proposals in the LES to achieve compliance with the legally required air quality standards as quickly as possible. In order to meet this duty, the policies in the LES commit to taking steps to control all sources of pollution in London, including fixed point sources such as CHP and energy from waste plant. Small gas engine CHP plant can be particularly problematic for air quality as they will often produce more overall NO_x emissions per unit of heat delivered than the equivalent domestic boilers: for this reason injecting gas into the grid from the AD plant would be considered to have lower overall impact on regional air quality than combustion in an on-site engine.

5.23. The LES commits to delivering more decentralised energy in London and recognises that there is the opportunity to increase this type of energy supply to 15 per cent of demand by 2030. Increasing decentralised energy is an important part of the Mayor's pathway to achieving a zero carbon city by 2050.

5.24. The LES strongly supports the generation of renewable energy from solar sources. To meet its zero-carbon ambition, London will require around ten times more solar energy generation to be installed: two gigawatts (GW) by 2050. The Mayor has therefore set a target for London to achieve 1 GW of installed capacity by 2030 and 2 GW by 2050. The proposed solar PV would contribute a small but welcome quantity of new solar generation capacity.

5.25. The LES supports battery storage, which is important to balance supply and demand at the building, district and national levels. It describes how battery storage is likely to become increasingly important, and thermal storage could enable surplus electricity generation from renewables (for example solar PV in the summer), to be converted to and stored as heat for later use in district heating. The proposed battery storage would contribute to this objective.

Other policies and strategies

5.26. The Mayor's Zero Carbon London: A 1.5C Compatible Plan[5] underpins the LES and shows how London can meet zero carbon by 2050 in order to contribute to meeting the aim of the 2015 Paris Agreement to limit the global average temperature rise to 1.5C above pre-industrial levels.

5.27. In order to achieve this aim, the Plan considers a number of energy pathways that could be adopted. The proposed pathways will see London reduce its carbon emissions by 60 per cent on 1990 levels by 2030 and by nearly 80 per cent by 2040.

6. Carbon

6.1. This section identifies relevant policy for London with regard to carbon and the transition to a low carbon economy.

[5] GLA, December 2018: Zero Carbon London: A 1.5ºC Compatible Plan

London Plan

6.2. Chapter 5 of the London Plan is concerned with London's response to climate change, which is identified as being caused by the emission of greenhouses gases, primarily carbon dioxide. The reduction in carbon dioxide is a key objective for the Mayor in line with his statutory remit, and the London Plan supports the Mayor's strategies for tackling climate change particularly in relation to the built environment.

6.3. Policy 5.17 addresses waste capacity. Part B.e of the policy sets a detailed performance standard for development of new waste capacity in London known as the carbon intensity floor or CIF. Policy 5.17B.e requires proposals for waste management to be evaluated against a number of criteria, including:

"achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings. Facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum CO_2eq performance of 400 grams of CO_2eq per kilowatt hour (kwh) of electricity produced. Achieving this performance will ensure that energy generated from waste activities is no more polluting in carbon terms that the energy source it replaces (see paragraph 5.85 below)".

6.4. The supporting text for this policy explains the development of this performance standard as follows:

"5.85 To support the shift towards a low carbon economy the Mayor has developed a minimum greenhouse gas performance for technologies generating energy from London's non-recyclable waste. This minimum performance, known as the carbon intensity floor, has been set at 400 grams of CO_2 eq generated per kilowatt hour (kwh) of electricity generated. All facilities generating energy from London's waste will need to meet this level, or demonstrate they can practically meet it in the future in order to gain Mayoral support. The GLA has developed a free on-line ready reckoner tool to assist local authorities and applicants measuring and determining greenhouse gas performance of waste management activities including waste-to-energy against the carbon intensity floor. This tool can be found at: http://www.london.gov.uk/priorities/environment/putting-waste-good-use/making-the-mostof-Waste.

"5.85A The carbon intensity floor has been set for waste-to-energy activities in London to achieve at least a positive carbon outcome, whereby the direct emissions from the technology are offset by emissions savings from the generation of low carbon energy in the form of heat, electricity and transport fuel. This would, for example rule out new mass burn incineration facilities of mixed waste generating electricity only, but may allow combustion of waste with high biomass content where both heat and power generated are used. This approach supports technologies able to achieve high efficiencies particularly when linked with gas engines and hydrogen fuel cells. More information on how the carbon intensity floor has been developed and the ability to meet it can be found in Policy 2 of the Mayor's Municipal Waste Management Strategy. Waste to energy facilities should be equipped with a heat off-take from the outset such that a future heat demand can be supplied without the need to modify the heat producing plant in any way or entail its unplanned shutdown. It should be demonstrated that capacity of

the heat off-take meets the carbon intensity floor at 100% heat supply. In order to ensure the carbon intensity floor remains relevant, the Mayor will consider reviewing the CIF level in future iterations of the London Plan.

"5.85B Examples of 'demonstrable steps' as outlined in Policy 5.17 Be would be:
• a commitment (via a Section 106 obligation) to deliver the necessary means for infrastructure t
meet the min CO_2 standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency;
• an agreed timeframe (via a S106) as to when proposed measures will be delivered;
• the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority.
To assist in the delivery of 'demonstrable steps' the GLA can help to advise on heat take-off opportunities for waste to energy projects, particularly where these are linked to GLA supported Energy Master Plans".

6.5. The CIF policy has been a critical driver in progressing work being undertaken between the GLA, local authorities and incinerator operators to identify the viability for heat-offtake opportunities from all London incinerators, co-ordinated through the GLA's Decentralised Energy Enabling Project (DEEP). Evidence regarding the ability of the proposed ERF to achieve heat off-take and therefore meet the current and future CIF is set out in the GLA's Written Representation **(WR3: Carbon).**

Draft London Plan

6.6. The CIF policy for new waste management capacity, including the maximum level of 400g of CO_2 equivalent emissions per kilowatt hour electricity produced, has been retained in the draft London Plan. This is set out in Policy SI8 *Waste capacity and net waste self-sufficiency***.** Part D3) of Policy SI8 requires developments proposals for new waste sites or to increase the capacity of existing sites to be evaluated against the following criteria:

"D3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon materials) resulting in significant greenhouse - facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO_2 equivalent per kilowatt hour of electricity produced".

6.7. Paragraph 9.8.11 describes how, to support the shift towards a low-carbon economy, all facilities generating energy from waste are required to meet, or demonstrate that they can meet in future, the CIF. It states *"Achieving the CIF effectively rules out traditional mass burn incineration techniques generating electricity only. Instead, it supports techniques where both heat and power generated are used, and technologies are able to achieve high efficiencies, such as when linked with gas engines and hydrogen fuel cells".*

6.8. Paragraph 9.8.12 of the draft London Plan requires that *"waste to energy facilities should be equipped with a heat off-take from the outset such that a future heat demand can be supplied without the need to modify the heat producing plant in any way or entail its unplanned shut-down. It should be demonstrated that capacity of the heat off-take meets the CIF at 100 per cent heat supply. In order to ensure it remains relevant, the CIF level will be kept under review"*.

6.9. The rationale and methodology for developing the CIF is set out in the LES. A short summary is also included in the Ready Reckoner User Guide available on the GLA website.

6.10. GLA Officers have not been provided with any evidence to demonstrate that the proposed ERF is able to meet the CIF performance identified by the Applicant. The Applicant's CHP study does not cite any facilities that have achieved the high electrical efficiencies upon which their figures are based.

6.11. Detailed evidence in this respect is provided in the GLAs Written Representations (WR3: Carbon).

<u>London Environment Strategy</u>

6.12. The LES sets out to re-establish London's position as a leader in tackling climate change by setting an ambition for London to become zero carbon by 2050. This will involve changes to the way in which Londoners travel, work and live, including how energy is sourced and generated, including use of fossil fuels being replaced by renewable sources.

6.13. Chapter 6 of the LES highlights the challenges associated with decarbonising the gas grid. Gas use in London represents around half of total energy consumption, and contributes 30 per cent of London's total emissions. Most of this gas is used for heating in buildings. The LES describes how, while natural gas is a fossil fuel, there may be some potential to decarbonise the gas grid, such as significant uptake of biogas or conversion of the gas grid to use hydrogen produced from renewable sources. The proposed Anaerobic Digestion facility and, in particular, supports the export of biogas generated by the facility, is in conformity with the LES in this regard. Given the enhanced efficiency of gas export compared with electricity generation, the GLA would wish to see that connection to the gas grid, or use of biogas to power vehicles, is a requirement of the DCO (see section 9 of this document).

6.14. Chapter 7 of the LES is concerned with waste, which includes a carbon-based approach. The supporting text for Objective 7.3: Reduce the Environmental Impact of Waste Activities states "Sending waste to landfill or incineration generates GHG emissions whereas recycling materials avoids GHG emissions that would have otherwise occurred in the manufacturing of products from virgin materials. A carbon-based approach promotes recycling, particularly of high carbon and high value materials, such as plastic, metals and textiles". A carbon-based approach to emission performance standards (EPS) is therefore considered to underpin the Mayor's policies and objectives with regard to the circular economy (see section 6 of this document).

6.15. Policy 7.3.2 is concerned with meeting Objective 7.3. Proposal 7.3.2a requires that "Waste authorities, in delivering their waste management functions, are expected to demonstrate how they can meet the greenhouse gas Emissions Performance Standard (EPS)". In performing their waste functions, the GLA expects waste authorities to set out how their waste activities achieve the following EPS targets:

"• -0.069 tonnes CO2e per tonne of waste managed by 2020/21

• -0.084 tonnes CO2e per tonne of waste managed by 2024/25

• -0.167 tonnes CO2e per tonne of waste managed by 2030/31".

6.16. To meet the above targets, any waste collected by waste authorities should not be delivered to the proposed ERF unless it can be shown that this would meet the CIF. The GLA would wish to see compliance with the above targets is a requirement of the DCO (see section 9 of this document).

6.17. Proposal 7.3.2.b specifically relates to energy from waste. It states: *"Waste authorities must demonstrate how solutions generating energy from waste (EFW) meet the carbon intensity floor (CIF), or put in place demonstrable steps to meet it in the short-term*". The LES explains that

"…in addition to the EPS, the CIF was developed to help decarbonise London's energy supply by encouraging clean, efficient and local energy generation from London's nonrecycled waste. Waste going to EFW plants often contains large amounts of recyclable materials that are high carbon and high value. Reducing the amount of high carbon materials particularly plastics and metals going to EFW plants will deliver GHG savings, and reduce the reliance on fossil fuels. This will drive change and investment within boroughs and with facility operators, to ensure that truly residual waste is used to generate both heat and power for the benefit of Londoners.

"The Mayor will retain, for waste authorities, a target CIF level of 400 grams of CO_2 per kWh of electricity produced from LACW until at least 2025.

"Meeting this CIF target effectively rules out the use of traditional mass burn incineration techniques generating electricity only. It supports the take up of highly efficient technologies generating both heat and power. Achieving the CIF target can be done by:

- *reaching high recycling rates, including for plastics, metals and textiles. This reduces the 'carbon intensity' of residual waste going to energy generation*
- *pre-treatment to remove recyclable materials from the residual waste stream*
- *generating energy from 100 per cent organic waste (for example anaerobic digestion of food waste). This is deemed to be carbon neutral*
- *using energy generation facilities generating both heat and power*
- *using waste derived fuels and other low CO_2 transport options.*

Steps to demonstrate compliance with the CIF should include but are not be limited to:

- *ongoing reductions in the amount of high carbon materials sent for incineration or gasification that could be recycled*

- *activities resulting in investment in technology or infrastructure improving the overall efficiency of the facility to meet the CIF.*

- *waste authorities and relevant facility operators actively supporting roll out of existing energy master plans to help connect heat infrastructure to local developments.*

  The CIF will be reviewed in 2025, or earlier where appropriate, once London's heat networks and demand are better understood, with a view to tightening it to around 300 grams per kWh of electricity produced."

6.18. Measures for achieving the CIF target set out in relation to Policy 7.3.2.b include generating energy from 100 per cent organic waste, for example anaerobic digestion of food waste (this is deemed to be carbon neutral) and using energy generation facilities generating both heat and power. Pre-treatment of waste prior to incineration is required to remove material that could be recycled and thus achieve a reduction in carbon emissions.

6.19. All of London's existing large-scale EfW plants with the exception of Edmonton are heat-off take ready (SELCHP, RRRF and Beddington). Edmonton will be replaced by a heat off-take ready EfW by 2025. SELCHP has implemented a limited heat supply for the London Borough of Southwark after almost 20 years of operation, and Beddington is currently doing so in conjunction with the London Borough of Sutton. However, as the LES states they, have yet to fully develop their heat supply capability for other end users. The LES expects all EfW facilities to manage truly non-recyclable waste and operate in CHP mode to meet the CIF.

6.20. Available evidence6 regarding the potential for heat offtake for the Belvedere area indicates CHP would not be viable and therefore that the ERF would undermine the achievement of the CIF target. Further details are provided in the GLA's Written Representation (WR 1 Heat Offtake and WR 3: Carbon).

6.21. The application does not provide any information to pre-treatment of residual waste to achieve the CIF. Further details are provided in the GLA's Written Representation (WR 4 Lack of Need for Waste Capacity).

7. Waste

7.1. This section identifies relevant policy with regard to waste in the context of the circular economy and effective implementation of the waste hierarchy.

[6] Thamesmead and Belvedere Heat Network Feasibility Study: Work Package 1, London Borough of Bexley, May 2019

London Plan

7.2. The London Plan establishes that London should manage as much of the capital's waste within its boundaries as practicable, enabling London and Londoners to receive environmental and economic benefits from its management. It is acknowledged that waste contracts do not recognise administrative boundaries and that waste flows across borders. Consequently, the aim of his waste policies, in particular Policy 5.16 *Waste Net Self-Sufficiency*, is to achieve net self-sufficiency for household and commercial waste by 2026. This would mean enough sites are identified within London to deal with the equivalent of 100% of London's household and commercial waste, regardless of the waste's origin.

7.3. As part of the principle of net self-sufficiency, the GLA recognises that in the short-term waste may be exported outside of London – including Europe – whilst London markets are established. In all cases this should only be considered as an interim option with commercial agreements reflecting the ambition to maximise management of the capital's waste within its boundaries. Equally, the Mayor encourages the flow of appropriate materials into London where economically beneficial.

7.4. With regard to waste capacity, Policy 5.17 *Waste Capacity* sets out the following criteria with regard to the Mayor's strategic approach and planning decisions for waste processing capacity:

"Strategic

A The Mayor supports the need to increase waste processing capacity in London. He will work with London boroughs and waste authorities to identify opportunities for introducing new waste capacity, including strategically important sites for waste management and treatment, and resource recovery parks/consolidation centres, where recycling, recovery and manufacturing activities can co-locate.

Planning Decisions

B Proposals for waste management should be evaluated against the following criteria:

- *a. locational suitability (see LDF preparation paragraphs F and G below)*
- *b. proximity to the source of waste*
- *c. the nature of activity proposed and its scale*
- *d. minimising waste and achieving high reuse and recycling performance*
- *e. achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings. Facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum CO_2eq performance of 400 grams of CO_2eq per kilowatt hour (kwh) of electricity produced. Achieving this performance will ensure that energy generated from waste activities is no more polluting in carbon terms that the energy source it replaces (see paragraph 5.85 below).*
- *f. the environmental impact on surrounding areas, particularly noise emissions, odour, air quality and visual impact and impact on water resources*
- *g. the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the scope to maximise the use of rail and water transport using the Blue Ribbon Network.*

The following will be supported:

h. developments that include a range of complementary waste facilities on a single site

i. developments for manufacturing related to recycled waste

j. developments that contribute towards renewable energy generation, in particular the use of technologies that produce a renewable gas

k. developments for producing renewable energy from organic/biomass waste.

C Wherever possible, opportunities should be taken to provide combined heat and power and combined cooling heat and power.

D Developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.

E Suitable waste and recycling storage facilities are required in all new developments".

7.5. The location of the proposed REP meets the criteria for Policy 5.17 with regard to the proposed Anaerobic Digestion facility, which is expected to contribute a positive carbon outcome. However, insufficient evidence has been provided that the proposed location is suitable for the proposed ERF. The GLA's evidence available[7] indicates that, when considered in conjunction with the existing RRRF, the proposed ERF would not deliver CHP benefits to the local area and therefore does not meet the requirement regarding CIF performance. Similarly, the location has not been demonstrated to have been selected on the basis of local need as the RRRF already provides recovery capacity for Bexley and a number of waste authorities located adjacent to the river. The addition of further EfW capacity in this location would over-develop the location with resultant adverse cumulative effects particularly with regard to air quality.

7.6. Further details regarding the CHP demand in the local area and the existing capacity of RRRF to supply this demand are provided in the GLA's Written Representations (WR 1 Heat Offtake). Evidence with regard to air quality is provided in the GLA's Written Representations (WR 6 Air Quality).

7.7. Policy 5.17 requires that planning decisions should take into account the environmental impact on surrounding areas and should consider the full transport and environmental impact of all collection, transfer and disposal movements. There is limited information available in the application documents as to the Applicant's intentions with regard to collection and transfer arrangements and it is therefore not possible to determine the extent to which criteria B.b, B.f and B.g are met. Further details are provided in the GLA's Written Representations (WR 5: Waste Transfer Impacts).

[7] Thamesmead and Belvedere Heat Network Feasibility Study: Work Package 1, London Borough of Bexley, May 2019

7.8. There is no description in the application documents as to where waste feedstock would be sourced and no commitments are made with regard to transport mode and routeing other than that vehicle routeing would adhere to the London Lorry Control Scheme. Whilst the transfer of waste by river would be welcomed as in accordance with Policy 5.17, this is not a commitment of the application. The GLA would wish to see river transportation maximised as a requirement of the DCO (see section 9 of this document).

Draft London Plan

7.9. Chapter 9 of the draft London Plan addresses sustainable infrastructure, including waste management infrastructure. Paragraph 9.7.3 confirms the Mayor's commitment to the approach to waste management set out in detail in the LES. It states:

"The Mayor is committed to meeting or exceeding the recycling targets for each of the following waste streams, and to generating low-carbon energy in London from suitable remaining waste:

• municipal waste – 65 per cent recycling/composting by 2030

• construction, and demolition and excavation waste – 95 per cent recycling by 2020".

7.10. Paragraph 9.7.3A states:

"Modelling suggests that if London achieves the reduction and recycling set out above, it will have sufficient Energy from Waste capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational".

7.11. Further details regarding the modelling work undertaken and how this conclusion has been drawn is set out in the GLA's Written Representations (WR4: Implications of Excess Waste Capacity).

7.12. Part A of Policy S18 Waste capacity and net waste self-sufficiency sets out how London's waste should be managed sustainably:

"1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026

2) existing waste management sites should be safeguarded (see Policy SI9 Safeguarded waste sites)

3) the waste management capacity of existing sites should be optimised

4) new waste management sites should be provided where required

5) environmental, social and economic benefits from waste and secondary materials management should be created".

7.13. The Mayor accepts that the principle of net self-sufficiency will, in certain circumstances, involve waste being treated in London that originated elsewhere.

7.14. Policy S18, in part C, goes on to describe development proposals that are particularly encouraged; these are development proposals which:

"1) deliver a range of complementary waste management and secondary material processing facilities on a single site

2) support prolonged product life and production of secondary materials including repair, refurbishment and remanufacture

3) contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste

4) provide combined heat and power and/or combined cooling heat and power

5) contain proposals to effectively deal with CD&E waste on site and minimise export to landfill".

7.15. The proposed REP would contribute through the Anaerobic Digestion facility to the generation of renewable biogas and is therefore supported provided the biogas is used directly for heating or vehicle fuel rather than electricity generation. The application states at paragraph 5.4.6 of the Planning Statement (document 7.1) *"Biogas would be upgraded to biomethane which could either be used for Compressed Natural Gas (CNG) production or injected into a local gas network. CNG could be used as fuel for on-site vehicles however if this is not feasible then REP would incorporate a 'CHP engine' to generate electricity and heat to be used on-site"*. A requirement is proposed (see section 9 of this document) to ensure that the biogas produced in the REP is utilised efficiently.

7.16. The application does not provide evidence as to the proportion of renewable energy that would be generated by the proposed ERF, but it is considered likely (based on the applicant's analysis of London's residual waste streams) that the majority of energy generated by the proposed ERF would not be renewable. Further details are provided in support of this view in the GLA's written representations (WR2 Renewable Energy).

7.17. Concerns regarding the viability of CHP provision are explained in section 4 of this document and further expanded upon in the GLA's written representations (WR1 Heat Offtake).

7.18. Part D of Policy SI8 states that development proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:

"1) the nature of the activity, its scale and location

2) job creation and social value benefits including skills, training and apprenticeship opportunities

3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings - facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO_2 equivalent per kilowatt hour of electricity produced

4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed

5) the transport and environmental impacts of all vehicle movements related to the proposal - the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported".

7.19. The above criteria generally reiterate themes already developed in the London Plan and LES.

7.20. As regards job creation (Policy SI8, Part D 2), it is recognised that construction of the proposed REP would create benefits in terms of approximately 837 temporary construction jobs (on an average monthly basis) during the expected construction 43 month period, and that in the longer term there are opportunities for 75 permanent full time equivalent (FTE) jobs to be created. The socio-economic assessment also provides estimates of jobs within the supply chain that would arise during both the construction and operational phase. Whilst job creation is in general conformity with the draft London Plan, recycling facilities would provide a greater number of long-term jobs than an ERF facility, which burns recyclable waste. A report[8] on how London will successfully transition to a circular economy showed that 40,000 jobs could be created by 2030. This includes 12,000 new jobs, the majority of which would be in low to mid skilled jobs in reuse and recycling. This is summarised in Table 2 below taken from the report

Table 2: Job creation potential from London's transition to a circular economy

	Scenario 1 No new initiatives	Scenario 2 Current development	Scenario 3 Transformation
Circular economy jobs in 2030[5]	50,000	63,000	87,000
Job creation (gross)	3,000	16,000	40,000
Job creation (net)[6]	1,100	5,500	12,000
Unemployment rate fall (% points)	0.02	0.12	0.26
Proportion of 2014-15 excess unemployment (%)	1.1	5.7	12.5

[8] Employment and the circular economy -job creation through resource efficiency in London, GLA December 2015.

7.21. As regards skills training and apprenticeship opportunities, the GLA notes that there is no proposal in the DCO application to contribute to the skill base of employees to offer apprenticeship training, or a commitment to pay the London Living Wage (LLW) as a minimum. This does not conform with the draft London Plan or other mayoral policies and guidance including the Mayor's Supplementary Planning Guidance: Planning for Equality and Diversity in London, and the Mayor's Responsible Procurement Policy. The GLA would wish to see appropriate commitments with regard to skills training and apprenticeship opportunities and payment of the LLW are incorporated into the scheme and has set out proposed DCO requirements in section 9 of this document.

7.22. The draft London Plan is very specific with regard to how developers should demonstrate compliance with Policy S18 D 3) (positive carbon outcome). Paragraph 9.8.13 sets out examples of the steps required to demonstrate a positive carbon outcome:

- *"a commitment to source truly residual waste – waste with as little recyclable material as possible.*
- *a commitment (via a Section 106 obligation) to deliver the necessary means for infrastructure to meet the minimum CO_2 standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency.*
- *an agreed timeframe (via a Section 106 agreement) as to when proposed measures will be delivered.*
- *the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority".*

7.23. The DCO application does not demonstrate commitment to these, or equivalent, steps to ensure that the composition of the waste and the heat offtake would meet the carbon performance target. Further explanations of these concerns are set out in sections 4 and 5 of this document and full appraisals are provided in the GLA's written representations (**WR 1 Heat Offtake** and **WR 3 Carbon**).

<u>London Environment Strategy</u>

7.24. The LES sets out the principles of the circular economy, in which as much value as possible is extracted from resources, through their use and reuse, before they become waste.

7.25. Chapter 7 of the LES is concerned specifically with waste, and the introduction explains how the Mayor is working to create a circular economy. This involves:

- *"reducing waste and the use of single use packaging, so that fewer disposable products are created in the first place*
- *ensuring valuable resources are kept in use for as long as possible*
- *London boroughs, businesses and the waste industry increasing the availability and visibility of recycling facilities and services, so that we can all play our part in recycling materials that have outlived their first use*
- *making the most of materials that can no longer be reused or recycled, by using them to generate low carbon energy"*

If this approach is successful, it will ensure that only unavoidable waste is sent for incineration, negating the need for new incineration facilities in London".

7.26. The following objectives and policies are considered directly relevant to the proposed development:

- Objective 7.2 *Maximise Recycling Rates*: *"the Mayor expects London to achieve an overall 65% municipal waste recycling rate (by weight) by 2030"*. The objective sets out detailed interventions that will be required (some by other stakeholders, such as businesses) to achieve this. Achievement of the overall 65% rate requires businesses to achieve 75% and households to achieve 50% by 2030.

- Proposal 7.3.1.a *"Waste authorities must demonstrate how they will transition their waste fleets to low or zero emission options, prioritising the phasing out of diesel. Waste authority waste fleets are expected to comply with the Ultra Low Emission Zone (ULEZ) vehicle exhaust emission standards and to work towards the Mayor's overall ambition for:*

- *all new cars and vans (less than 3.5 tonnes) being zero emission capable from 2025*

- *all heavy vehicles (greater than 3.5 tonnes) being fossil fuel-free from 2030*

- *zero emission fleets by 2050*

  Fossil-fuel free can include the use of 100 per cent renewable fuels derived from sources such as food waste and waste oils".

- Proposal 7.3.2.b *Waste authorities must demonstrate how solutions generating energy from waste (EFW) meet the CIF, or put in place demonstrable steps to meet it in the short-term*. The supporting text states: *"the Mayor does not believe it necessary to have any additional EFW facilities built in London to manage municipal waste. Modelling shows that if London achieves a 65 per cent recycling target by 2030, no additional EFW facilities (other than those already granted planning permission) will be required in London to manage municipal waste. The Mayor expects all of London's EFW facilities to only manage truly non-recyclable waste, and maximise the use of both the heat and power generated"*.

7.27. It should be noted that, for the purposes of the LES, 'municipal waste' is defined as including commercial and industrial waste similar in nature to household waste in line with the EU definition, which the UK Government has adopted.

7.28. The GLA confirms that the proposed Anaerobic Digestion facility conforms with the LES in supporting achievement of the CIF. However, available evidence9 regarding the contribution of the ERF to CHP indicates that that the ERF would undermine the achievement of the CIF target. The DCO application does not provide any information with regard to the proposed ERF as how the Applicant would comply with Proposal 7.3.2.b and ensure that only truly non-recyclable waste is managed in the ERF. Further details are provided in the GLA's written representations (WR4 Implications of Excess Waste Capacity).

7.29. Objective 7.4 is concerned with ensuring London has sufficient capacity to manage all the waste it produces. Proposal 7.4.1 Supporting the use of local waste sites and promoting a circular approach to waste management sets out how the Mayor wants to see London's waste sites optimised to support circular economy activities like reuse and repair, providing environmental and social benefits by creating new jobs and apprenticeships. Figure 48 sets out London's municipal waste infrastructure capacity requirements for achieving the Mayor's waste reduction and recycling targets by 2030, and meeting the self sufficiency target by 2026. It shows that London faces a significant recycling capacity gap of around 1.4 million tonnes. The GLA is challenging the waste industry to collaborate on identifying the best opportunities both inside and outside London to increase recycling capacity.

7.30. The LES states: "Achieving the Mayor's reduction and recycling targets will mean that no new energy from *waste facilities in London will be needed, with an expected 153,000 tonnes surplus EFW capacity by 2030*". This figure is net of EFW facilities outside of London for which contracted waste is provided by London waste authorities (circa 390,000 tonnes per annum). Including this waste significantly increases London's expected surplus EFW requirements for managing its residual waste. Table 3 below summarises London's estimated EFW requirements under scenarios modelled for both the London Plan and London Environment Strategy to 2030.

Table 3: London's EFW infrastructure needs to 2030 and 2036

	EFW capacity need (surplus (-ve)/shortage (+ve) tonnes per year	
Scenario/Year	**2030**	**2036**
LES (London EFW facilities only)	-153,000	-101,000
LES + EFW capacity outside London	-543,000	-491,000
London Plan (London EFW facilities only)	+25,000	+90,000
London Plan + EFW capacity outside London	-365,000	-300,000

Source: 2030 figures taken from Figure 48 London Environment Strategy and Figures 65 and 66 London Environment Strategy Appendix 2. 2036 figures taken from the GLA's Waste model.

[9] Thamesmead and Belvedere Heat Network Feasibility Study: Work Package 1, London Borough of Bexley, May 2019

8. Transport

London Plan

8.1. Chapter 6 of the London Plan is concerned with transport. Policy 6.14 Freight states that the Mayor will encourage the increased use of the Blue Ribbon Network, for freight transport. The Blue Ribbon Network is London's strategic network of waterspaces. This objective is further developed in Policy 7.26: Increasing the use of the Blue Ribbon network for freight transport, which sets out a safeguarding policy and criteria for use of safeguarded wharves.

8.2. It is noted that all deliveries of waste to the Anaerobic Digestion facility are proposed to take place by road, and this is considered to be unavoidable given the putrescible nature of the waste, which is unsuitable for the slower delivery afforded by river. As regards the ERF, the DCO application makes no commitments but sets the 'nominal scenario' as 75% of waste input by river and 25% by road. Two other scenarios are assessed: 100% waste to the ERF by road and; 100% by river.

8.3. The latter, 100% delivery by road, is considered unacceptable and contrary to the London Plan. Currently the GLA and TfL has not seen any justification as to why 75% of waste should be delivered by road but considers that it may be acceptable to allow a small amount of feedstock to be delivered by road an annual basis, to allow for operational flexibility and issues such as jetty outages. The GLA and TfL would wish to see, as a minimum, a commitment for at least 75% of waste inputs to the ERF to be delivered by river. The GLA and TfL would wish to see commitment to an acceptable level of waste transport by river included as part of the DCO and has provided comments in Section 9 of this document with regard to proposed DCO requirements.

Draft London Plan

8.4. As noted in Section 6 of this document, the Draft London Plan expects proposals for new waste infrastructure to take account of transport and environmental impacts of all vehicle movements related to the proposal (Policy S18). The policy also supports use of river transport. Draft London Plan Policy T2 – 'Healthy Streets' paragraph D states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving.

8.5. The concerns with regard to compliance with these policies are set out in the GLA's written representations (**WR5: Waste Transfer Impacts**).

8.6. Draft London Plan Policy T4 – 'Assessing and mitigating transport impacts' paragraph B states: *"Transport assessments should be submitted with development proposals to ensure that any impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed."*

8.7. As noted in TfL's relevant representations, it is considered that the applicant has not sufficiently assessed the transport impacts of the construction associated with the proposed development. This is addressed in the GLA's written representations (**WR6: Construction Traffic Impacts and WR7: Electrical Connection Impact**).

8.8. Policy T7 – 'Deliveries, servicing and construction' of the Draft London Plan paragraph F states that *"development proposals should facilitate sustainable deliveries and servicing, including through the provision of adequate space for servicing, storage and deliveries off-street."*

8.9. Given the site's access to the jetty on the River Thames, it is considered that the proposals do have the potential to facilitate sustainable deliveries and servicing, including during construction. This issue is addressed in the GLA's written representations (**WR6: Construction Traffic Construction Impact**).

8.10. Policy T7 of the Draft London Plan policy paragraph I further states that: *"Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites."*

8.11. The Draft London Plan focusses on sustainable deliveries and servicing, both during the operational phase of a development and during construction. Paragraph 10.7.1 states: *"An efficient freight network is necessary to support the function of the city. This policy seeks to facilitate sustainable freight movement in London through consolidation, modal shift and promoting deliveries at different times of day and night in order to reduce the impact on road congestion and air quality, and conflict with other uses."*

8.12. In addition, paragraph 10.7.4 of the Draft London Plan states; *"When planning freight movements, development proposals should demonstrate through Construction Logistics Plans and Delivery and Servicing Plans that all reasonable endeavours have been taken towards the use of non-road vehicle modes. Where rail and water freight facilities are available, Transport for London's freight tools should be used when developing the site's freight strategy."*

8.13. While the ES submitted does mention use of the jetty for 75% of waste deliveries to the REP, no commitment to any level of transport via river. Furthermore, insufficient evidence has been provided to show that the remaining 25% of waste could not be transported via the river. This is set out in the GLA's written representations (**WR5: Waste Transfer Impacts**)

<u>London Environment Strategy</u>

8.14. A key aim of the LES is "for London to be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy". This includes London's entire transport system (including private vehicles) to be zero emission by 2050.

8.15. Proposal 4.2.1.d states "The Mayor aims to reduce emissions from private and commercial vehicles by phasing out and restricting the use of fossil fuels, prioritising action on diesel". Proposal 4.2.1.e refers specifically to freight: "The Mayor aims to reduce emissions from freight through encouraging a switch to lower emission vehicles, adopting smarter practices and reducing freight movements through better use of consolidated trips".

8.16. The LES is also concerned with emissions from non-road transport, as set out in Proposal 4.2.2 Reduce emissions from non-road transport sources, including by phasing out fossil fuels. The Mayor supports increased use of waterways for freight and passenger services, as well as leisure uses. However, the LES explains that emissions need to be carefully managed to ensure the problem does not just shift from one source to another.

8.17. Section 5 of this document notes the how, in relation to waste transport, Proposal 7.3.1 of the LES requires all local authority waste deliveries to transition their waste fleets to low or zero carbon, prioritising the phasing out of diesel, in line with the LES objective of zero carbon by 2050.

8.18. The GLA would not wish to see development consent granted without a requirement for all deliveries of waste to the REP to use zero carbon methods. Section 9 of this document includes a proposed requirement to this effect.

9. Air Quality

9.1. This section identifies relevant policy with regard to air quality in London.

<u>London Plan (2016)</u>

9.2. Air quality is a key focus of the London Plan with regard to improving quality of life for Londoners and is a fundamental theme that runs throughout the Plan.

9.3. Policy 5.7 Renewable Energy seeks to increase the proportion of energy generated from renewable sources but states (in part D) that "all renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets, and to avoid any adverse impacts of air quality".

9.4. Policy 7.14 Improving Air Quality seeks to achieve reductions in pollutant emissions and minimise public exposure to pollution. Part B is concerned with development proposals:

"a. minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3)

b. promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils' 'The control of dust and emissions from construction and demolition'

c. be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

d. ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, and that it is possible to put in place measures having clearly demonstrated equivalent air quality benefits, planning obligations or planning conditions should be used as appropriate to ensure this, whether on a scheme by scheme basis or through joint area-based approaches

e. where the development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations. Permission should only be granted if no adverse air quality impacts from the biomass boiler are identified".

9.5. The proposed REP is located in the London Borough of Bexley, who have declared their whole borough to be an AQMA. The applicant's assessment of the air quality impacts of the plant showed that the majority of the impact would be in the neighbouring borough of Havering, who have also declared their whole area to be an AQMA[10].

9.6. As well the as London Plan policies above the National Planning Policy Framework affords considerable weight to AQMAs, stating at paragraph 181:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas…Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan"

Draft London Plan

9.7. Air quality is fundamental to the draft London Plan's ambition for 'Good Growth' and healthy living and is a recurring theme in respect of individual area-based policies.

9.8. Part DB of Policy GG3 Creating a Health City states that "to improve Londoner's health and reduce health inequalities, those involved in planning and development must…DB seek to improve London's air quality, reduce public exposure to poor air quality, and minimise inequalities in levels of exposure to air pollution".

9.9. Chapter 9 deals with sustainable infrastructure. Policy SI1 Improving Air Quality states that:

"A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

1) Development proposals should not:

a) lead to further deterioration of existing poor air quality

[10] Details of the extent of declared AQMAs can be found on the Defra website here: https://uk-air.defra.gov.uk/aqma/list . Air Quality action plans are published on the Borough websites.

b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits

c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality

d) create unacceptable risk of high levels of exposure to poor air quality"

9.10. Paragraph 9.1.1 states that "the Mayor is committed to making air quality in London the best of any major world city, which means not only meeting and maintaining legal limits for Nitrogen Dioxide as soon as possible but also working to achieve the World Health Organization targets for other pollutants such as Particulate Matter".

9.11. Paragraph 9.1.6. states that assessment of the impacts of a scheme on local air pollution should include fixed plant, such as boiler and emergency generators, as well as expected transport-related sources. Impact assessments should always include all relevant pollutants. Industrial, waste and other working sites may need to include on-site vehicles and mobile machinery as well as fixed machinery and transport sources.

9.12. Many objections to the proposed policy suggested that the policy should be both more stringent and include standards for Particulate Matter beyond those currently required for legal compliance. A specific point whether specific air quality standards should be applied to Energy from Waste plant impacts was raised in response to the energy policy of the plan. However, it is our view that, as the health impacts of specific pollutants are not dependent on the source, the policy requirements of SI1 should apply in the same way to all emission sources.

9.13. The DCO application provides an analysis of 'worst case' road traffic impacts assuming that waste is delivered by road. However, the assessment does not properly consider the impacts at worst-case receptors at the A206, and it is not possible to accurately determine the air quality impacts, whether any exceedances of the objective are likely, or the overall effects. Further, the ES does not assess the effects of waste delivery to the riparian WTSs, which are assumed to be required for both river and road delivery to the ERF; use of the WTSs would concentrate additional traffic and air emissions in areas of central London. The proposed development is potentially in conflict with Policy 5.7 and 7.14 of the London Plan, and Policy SI1 of the draft London Plan. These issues are addressed in the GLA's Written Representations (**WR6 Air Quality Impacts**).

9.14. Policy SD1 *Opportunity Areas* states that:

"A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:

6) Ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration".

9.15. The proposed REP is located in the Bexley Riverside Opportunity Area. Chapter 7 of the ES fails to give proper consideration to new tall buildings in the Opportunity Areas, and specifically with regard to impacts at elevated receptors, and the short-term (1-hour mean) criteria. As such, the development does not comply with Policy SD1 of the draft London Plan. These issues are addressed in the GLA's Written Representations (**WR6 Air Quality Impacts**).

London Environment Strategy

9.16. One of the key aims of the LES is for London to have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities.

9.17. In achieving both compliance with legal limits and the Mayor's targets, the LES takes into account the principles set out by Mr Justice Garnham in the Client Earth cases that compliance with air quality standards should be:

- achieved as soon as possible;
- via a route that reduces exposure; and
- by a steps which mean meeting the limits is not just possible, but likely.

9.18. Chapter 4 of the LES is focused on air quality and sets out the Mayor's proposals to improve air quality in London. Two pollutants remain a specific concern. These are particulate matter (PM10, PM2.5 and black carbon) and nitrogen dioxide (NO_2). The LES states that London is failing to meet the legal limit for NO_2. Particulate matter is damaging to health at any level and must be reduced. The LES states (page 41):

"Improving London's air quality requires the following actions:

• reducing exposure of Londoners to harmful pollution across London – especially at priority locations like schools – and tackling health inequality

• achieving legal compliance with UK and EU limits as soon as possible, including by mobilising action from the London boroughs, government and other partners

• establishing and achieving new, tighter air quality targets for a cleaner London, meeting World Health Organisation (WHO) health-based guidelines by 2030 by transitioning to a zero emission London".

9.19. The LES notes that improving air quality also offers an opportunity to also address climate change. It states: "In the past the lack of an integrated approach has resulted in unintended consequences, like encouraging the use of diesel, the promotion of biomass boilers, and gas-engine Combined Heat and Power (CHP) systems being installed in areas of poor air quality. Instead this strategy is seeking to design integrated policies that deliver multiple benefits". This relationship is noted in Proposal 4.3.3.b "The London Plan includes policies on energy provision to make sure CO2 and pollution targets are achieved in a coordinated way with no air quality dis-benefits".

9.20. Proposal 4.1.1c states that the "London Plan will encourage new developments to take into account local air quality so they are suitable for their use and location". This refers to a requirement in the draft London Plan that the overall suitability of a site (and its design/layout) should be considered for its proposed end use in relation to pollution.

9.21. Proposal 4.2.3.e states that the "London Plan includes policies to reduce the impact of new industrial and waste sites on local air quality". Under this Proposal, it is also stated that "the Mayor does not want any new Energy from Waste plants in London. If the Mayor's 65 per cent municipal waste recycling target is achieved, no further plants will be required".

9.22. The GLA also recognises that cleaning up London's air is about more than just meeting legal compliance and is therefore setting a course to achieve new ambitious targets, in line with current WHO health- based guidelines, particularly for $PM_{2.5}$, as set out in Objective 4.3.

10. Development Consent Requirements

10.1. The GLA and TfL have provided comments below on draft requirements that relate to strategic matters in set out in Sections 4 to 8 of this document, and also to propose additional requirements without which development consent should not be granted.

<u>The Applicant's proposed draft requirements</u>

10.2. The GLA and TfL have considered the draft requirements set out in Schedule 2 of the draft Development Consent Order and consider that currently only Requirements **13**, **14** and **17** are relevant to their strategic concerns. This position will be kept under review as the Examination progresses as it is recognised that the Applicant may amend these requirements and may also draft additional relevant requirements.

<u>Requirement 11</u>

10.3. Requirement 11 of the applicant's draft DCO states:

"11.—(1)No part of the authorised development may commence until a code of construction practice for that part has been submitted to and approved by the relevant planning authority. The code of construction practice submitted for approval must be substantially in accordance with the outline code of construction practice to the extent that it is applicable to that part and must include the following—

(a) the construction and phasing programme;

(b)liaison procedures;

(c)complaints procedures;

(d)nuisance management including measures to avoid or minimise the impacts of construction works (covering dust, wheelwashing, damping of stockpiles, sheeting materials, lighting, noise and vibration); (e)reference to undertaking construction activities in accordance with the recommendations of BS5228 'Noise and Vibration Control on Construction Open Sites' Part 1 Noise and Part 2 Vibration;

(f) construction waste management;

(g)measures for the maintenance of construction equipment;

(h) temporary storage of soils and other material of value to be in accordance with best practice;

(i)installation of hoardings and/or fencing;

(j)safe storage of polluting materials;

(k)protocol for flood warning and a flood incident management plan;

(l)methods to prevent water pollution and adverse impacts upon surface water drainage;

(m) restoration of site following completion of construction; and

(n)measures to deal with contamination which is likely to cause significant harm to persons or significant pollution of controlled waters or the environment.

(2) All construction works must be under taken in accordance with the approved code of construction practice".

10.4. The GLA and TfL consider that this Requirement must also require compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone. Both current and draft London Plan Policies make compliance with the NRMM Low Emission Zone a requirement for all major developments.

10.5. In order to comply with the NRMM Low Emission Zone the developer will need to ensure, at each phase of development, that the site is registered online at https://nrmm.london/ and that each piece of construction machinery on site meets the emission standard required for the zone or has been granted an exemption prior to operation. Details of the current NRMM Low Emission Zone are set out in the GLA SPG "Control of Dust and Emissions During Construction and Demolition"

Requirement 13

10.6. Requirement 13 of the Applicant's draft DCO states:

Construction of traffic management plan(s)
"13.—*(1) No part of the authorised development may commence until a construction traffic management plan for that part has been submitted to and approved by the relevant planning authority (in consultation with the highway authority). The construction traffic management plan(s) must be substantially in accordance with the outline construction traffic management plan and must include the following (as applicable for*

the part of the authorised development to which the construction traffic management plan relates)—

(a) construction vehicle routing plans;

(b) proposals for the scheduling and timing of movements of delivery vehicles including details of abnormal indivisible loads;

(c) site access plans;

(d) where practicable, temporary diversions of any public rights of way;

(e) measures to ensure the protection of users of any footpath within the Order limits which may be affected by the construction of the authorised development;

(f) proposals for the management of junctions to and crossings of highways and other public rights of way;

(g) a construction logistics plan; and

(h) a construction worker travel plan.

(2) The construction traffic management plan(s) must be implemented as approved".

GLA comments on draft Requirement 13

10.7. It is considered that draft Requirement 13 does not sufficiently commit the applicant to undertaking the appropriate assessments required to provide a realistic estimate of the impact of construction traffic and construction associated with the Electrical Connection construction on the strategic highway network.

10.8. The Construction Traffic Management Plans (CTMP) should be submitted to TfL for approval in writing, in consultation with the local highway authorities, to ensure any impacts are properly mitigated and the construction does not have an undue impact on bus route operations

10.9. TfL would request that the wording of the Requirement is amended to include a commitment to assessment of construction traffic impacts on the highway network and a commitment to mitigate the impact of construction traffic to the satisfaction of TfL and the local planning authority.

Furthermore, TfL would require a commitment that the construction works will not have a detrimental impact upon the SRN.Requirement 14

10.10. Requirement 14 of the Applicant's draft DCO states:

Operational worker travel plan

"14.*—(1) Prior to the date of final commissioning, an operational worker travel plan for those working at the authorised development must be submitted to and approved by the relevant planning authority. The operational worker travel plan must be in substantial accordance with the outline worker travel plan and set out measures to encourage staff working at Work Nos. 1, 2, 3, 4 and 5 to use sustainable modes of transport.*

(2) The operational worker travel plan must be implemented as approved."

GLA comments on draft Requirement 14

10.11. TfL would expect that the operational worker travel plans are approved by the relevant planning authority in consultation with Transport for London.

10.12. Furthermore, TfL consider that the wording of the Requirement should be amended to commit the applicant to setting out specific sustainable transport mode share targets, which should be approved by the relevant planning authority and TfL, and to add a requirement to implement additional travel planning measures to be implemented if these targets are not met.

Requirement 17

10.13. Requirement 17 of the Applicant's draft DCO states:

Combined heat and power

*"**17**. (1) On the date that is 12 months after the date of final commissioning, the undertaker must submit to the relevant planning authority for its approval a report ("the CHP review") updating the CHP statement.*

(2) The CHP review submitted and approved must—

(a) consider the opportunities that reasonably exist for the export of heat from Work No. 1 at the time of submission of the CHP review; and

(b) include a list of actions (if any) that the undertaker is reasonably required to take (without material additional cost to the undertaker) to increase the potential for the export of heat from Work No. 1.

(3) The undertaker must take such actions as are included, within the timescales specified, in the approved CHP review.

(4) On each date during the operation of numbered work 1 that is five years after the date on which it last submitted the CHP review or a revised CHP review to the relevant planning authority, the undertaker must submit to the relevant planning authority for its approval a revised CHP review.

(5) Sub-paragraphs (2) and (3) apply in relation to a revised CHP review submitted under sub-paragraph (4) in the same way as they apply in relation to the CHP review submitted under sub-paragraph (1).

(6) In the event that the export of heat from the authorised development is provided pursuant to any CHP review, the undertaker is not required to carry out and submit any further CHP reviews".

GLA comments on draft Requirement 17

10.14. It is considered that Requirement 17, as presently proposed, is wholly inadequate to meet the policy objectives set out in Sections 4 and 5 of this document as it would not require the Applicant to develop CHP - i.e. export heat from the ERF. The deliverability of heat offtake is a key concern of the GLA due to the relationship between the proposed REP and the existing RRRF, which to date has not been able to show it can export heat.

10.15. The GLA would therefore wish to see a commitment that no development should take place until such time as there is a demonstrable need for heat to be exported, this being over and above that which is currently available and unused from the adjacent RRRF. The reason for this is that without CHP (or without a credible case for the heat need having been made, which it has not so far), the ERF would be a carbon producer, not a carbon reducer, and would therefore not fulfil the objective of NPS EN-3 in that it would not support the Government's policies on sustainable development in particular mitigating and adapting to climate change. The GLA considers that the ERF would contribute to climate change in power-only mode and that this is unacceptable.

10.16. The GLA would also wish to see the following:

- details of heat offtake to be provided within the site, including details of ERF configuration and construction of heat pipes from the proposed heat generating station to the edge of the site;

- commitment to the Applicant undertaking a CHP feasibility review similar to that required for the existing RRRF assessing potential commercial opportunities for use of heat from the development, which must be submitted in writing to the relevant authority for its approval. The review should provide for ongoing monitoring and full exploration of potential commercial opportunities to use heat from the development as part of a Good Quality CHP scheme (as defined in CHPQA Standard issue 3), and for the provision of subsequent reviews of such opportunities as necessary.

- the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority.

10.17. By way of further context for the above, the GLA would wish to see commitment to invest in the construction of a heat main to deliver heat (within an agreed timeframe) from the ERF to the area identified in Bexley, through the Energy Masterplanning process, as the focal point for the first phase of a district heat network using heat from the ERF. This would provide the catalyst for the development of the heat network and the opportunity for the ERF to actually operate in CHP mode, through the effective use of both electricity and heat. Without the ERF financing and constructing this heat main there is an on-going financial barrier to the establishment of a heat network in the area into which the ERF could supply its heat. Without this heat network the heat from the existing ERF would not be able to be used and consequently there will clearly be no need for the REP.

10.18. The GLA would also wish to see commitment to invest (within an agreed timeframe) in the extension of the initial district heat network into other areas of south east London with high heat demand so that heat from the ERF can be supplied into neighbouring areas where there is a demand for heat from the ERF. This is the only way that heat from the REP can actually be used as there will not be a heat demand in the adjacent area in any way commensurate with the expected heat output from the ERF.

Additional requirements

10.19. In addition to the above comment on the Applicant's proposed requirements, the GLA would not wish to see development consent granted unless the following matters are included as requirements:

- River transport for delivery of at least 75% of feedstock (on an annual basis) to the ERF, with all bottom ash and co-mingled metals be taken from the site by river only – a similar condition is attached to the Section 36 consent (2006) and Section 36 variation (2015) for the RRRF requiring all waste to be transported by river with the exception of 85,000tpa of waste (except in the case of jetty outage) that may be delivered by road in any calendar. 85,000tpa equates to just under 11% of total annual deliveries;

- Jetty and pier to remain available at all times for tugs and barges transporting waste, residual materials following incineration, and consumable necessary for the operation for the development, and for no other purpose;

- Documentary records of the movements of all heavy commercial vehicles to/from the site to be made and retained for inspection;

- A commitment that the proposed Anaerobic Digestion facility, Battery Storage unit and solar PV panels will be delivered within an agreed timeframe;

- To achieve the Mayor's policy requirement with regard to the CIF (Policy SI8 draft London Plan), the ERF must commit to sourcing truly residual waste as set out in paragraph 9.8.13 of the draft London Plan). It is noted that the DCO application does not include any provision for a pre-treatment facility to be provided on site. However, the use of offsite pre-treatment should be required, and management and monitoring arrangements put in place to ensure that ERF feedstock has been pre-treated to recover all materials for recycling before delivery to the ERF. A requirement with regard to the types of waste to be treated at the facility was included in the DCO (2017) for North London Heat and Power Generating Station.

- Air emissions to be limited to the limits assessed in the ES, i.e. the draft BREF limits;

- Air emissions from machinery used during construction should conform with the London NRMM Low Emission Zone; and

- Appropriate commitments with regard to skills training and apprenticeship opportunities should be incorporated into the scheme in accordance with SI8 of the draft London Plan

and the Mayor's Supplementary Planning Guidance: Planning for Equality and Diversity in London.

Further issues to be considered

10.20. In addition to the specific conditions referred to above, the GLA and TfL would wish to see consideration given to the following issues where currently the application potentially not in compliance with London policy.

- All transport used for deliveries of waste and export of ash within London to be zero carbon. It is acknowledged that the Applicant is unlikely to be operating road deliveries itself, but a requirement is envisaged that would place the Applicant under an obligation to monitor and enforce arrangements for delivery of feedstock from its suppliers.

- As it is expected that the construction of the REP would require some changes to bus services and potential delays, which would impact on TfL's revenue and operating costs, a commitment to payment of any costs associated with the disruption from the Applicant should be incorporated into an appropriate legal agreement.

- Given the enhanced energy efficiency of gas export compared with electricity generation, connection of the Anaerobic Digestion facility to the gas grid or use to power vehicles should be a requirement of the DCO (as proposed in the application at para 5.4.6 of Planning Statement).

- A commitment to pay the London Living Wage as a minimum should be incorporated into the scheme in accordance with SI8 of the draft London Plan and the Mayor's Supplementary Planning Guidance: Planning for Equality and Diversity in London.

Other Development Consent Requirements

10.21. The GLA supports the Environment Agency's proposed planning commitments for the Applicant to put in place additional measures to effectively address the flood risk and biodiversity issues set out in the Agency's Relevant Representation.

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for further information, contact the GLA:
Juliemma McLoughlin, Chief Planner
020 7983 4271 email juliemma.mcloughlin@london.gov.uk
John Finlayson, Head of Development Management
020 7084 2632 email: john.finlayson@london.gov.uk
Katherine Wood, Team Leader
020 7983 4265 email katherine.wood@london.gov.uk
Vanessa Harrison, Principal Strategic Planner (Case Officer)
020 7983 4467 email vanessa.harrison@london.gov.uk
Doug Simpson, Principal Policy Officer (Waste Policy Lead)
020 7983 4288 email doug.simpson@london.gov.uk