

Riverside Energy Park, Belvedere

In the London Borough of Bexley

Planning Inspectorate reference: EN010093

Written Representation Summary

1. Context

1.1. The present report provides a summary of the GLA's objections to the proposed Riverside Energy Park (REP), set out in further detail within the full Written Representation. This document and the full Written Representation are complementary to the GLA's Local Impact Report (LIR) and incorporate the views of TfL

2. Issues of strategic importance

2.1. The proposal raises the following principal issues of strategic importance:

- energy;
- carbon;
- waste (including waste transport impacts); and
- air quality.

3. Energy

WR1: Heat Offtake

3.1. The GLA's detailed consideration of the REP proposals has concluded that there is insufficient heat demand in the local area for the proposed energy from waste facility known throughout the Applicant's documents as the Energy Recovery Facility (ERF) to operate as an effective CHP plant and that the Applicant overstates the CHP opportunities. The REP would not therefore deliver carbon savings. Furthermore, when operating in power-only mode the ERF would be a carbon producer, and not reducer, thereby slowing down the Government's ambition of transition to a low carbon economy.

3.2. The Applicant's CHP study focuses on heat supply from the proposed ERF and ignores the fact that the existing adjacent Riverside Resource Recovery Facility (RRRF), which is also an energy from waste incinerator, could meet feasible nearby heat demand with only 70% of its heat supply capacity.

- 3.3. No recent CHP facility has been successfully developed or planned in London without considerable public support. The DCO application demonstrates no evidence of the necessary level of engagement or commitment with communities and public bodies.
- 3.4. The level of detail provided for the proposed REP with regard to use of heat should be consistent with all recent incinerator developments in London.
- 3.5. Statements in the DCO application regarding operational synergies between the ERF and the RRRF are not accepted by the GLA.

WR2: Renewable Energy

- 3.6. The GLA considers that the majority of energy generated by the proposed ERF would not be renewable, as, subject to the available feedstock sources, and recycling practices in London, the renewable proportion of energy generated may be 50% or less.. This would mean that energy from the proposed ERF would primarily be derived from fossil-fuel and would not contribute to decarbonising the economy.
- 3.7. The use of biogas from the Anaerobic Digestion plant for electricity would significantly reduce the conversion efficiency of the renewable energy and would result in avoidable air emissions. The GLA considers that only direct use of gas through injection to the grid or into vehicles is appropriate.

4. Carbon

WR3: Carbon

- 4.1. The GLA considers that the Applicant has not provided adequate evidence to demonstrate how the proposed ERF will meet the London Plan's Carbon Intensity Floor (CIF) with regard to:
 - 1) demonstrating how the proposed ERF will operate at the claimed electrical efficiency of 34% in determining performance against the CIF; and
 - 2) satisfying examples of 'demonstrable steps' set out in the draft London Plan to effectively meet the CIF.
- 4.2. Due to concern regarding the possibility of the ERF undermining London's established targets for carbon reduction, the GLA commissioned consultants Eunomia to undertake a detailed analysis.
- 4.3. Eunomia's findings query the technology assumptions used as they were unable to identify reference plants for the efficiency levels claimed.
- 4.4. Based on these conclusions, the GLA considers that the Applicant:
 - appears to have overstated the performance of the ERF against the CIF in order;
 - has failed to include pre-treatment facilities in the REP which would reduce its ability to meet the CIF; and
 - has not demonstrated how the ERF will operate as an effective CHP facility managing truly non-recyclable waste to comply with national policy.

5. Waste

WR4: Implications of Excess Waste Capacity

- 5.1. The GLA's detailed modelling of London's current and future waste streams concludes that the proposed ERF is not required for managing London's non-recycled waste and would undermine achievement of his reduction and recycling targets set out in the London Environment Strategy (LES).
- 5.2. Waste mass balance projections demonstrate that if the Mayor's reduction and recycling targets are met, there will be no need for additional EfW capacity in London over and above existing committed capacity. The Applicant's own modelling estimates a need for only 272,300 tonnes per annum of additional EfW capacity by 2036 when facilities managing London local authority collected waste located outside of London are included. The GLA's modelling shows a 300,00 tonne per annum *surplus* when these facilities are included and applying the London waste projections used for the London Plan (2018).
- 5.3. An analysis of Waste Local Plans from local authorities surrounding London demonstrates no clear case exists for development of EfW overcapacity in London in order to serve regional needs.
- 5.4. The Government has shown recent support for an incineration tax, which increases the risk of the ERF becoming a stranded asset. A statement by the Prime Minister in April 2019 shows that the Government believes that excess incineration can undercut recycling and other waste management initiatives, preventing waste moving up the waste hierarchy. Until such time as an incineration tax is introduced, however, excess EfW capacity is expected to result in an overly competitive market that would reduce prices for incineration, on a simple supply and demand basis, thereby drawing in waste that could otherwise be recycled and undermine the Mayor's policies for moving towards a circular economy.
- 5.5. The absence of any pre-treatment of waste feedstock is considered to be a significant failure of the proposal as it would be likely to prevent national and London objectives, on moving waste up the hierarchy, to be met.

WR5: Waste Transfer Impacts

- 5.6. The DCO application does not identify where the waste will come from or what the quantum of waste would be for treatment in in the ERF. The DCO application makes no commitment to transport all waste by river, which is wholly unacceptable. One of the main justifications for selection of the Belvedere site is its potential for using the river as a sustainable mode of transport.
- 5.7. The GLA consider it to be a major flaw in the EIA process undertaken that insufficient assessment has been made of the environmental effects of the transfer of waste via the Applicant's existing waste transfer stations located along the River Thames that will be used to bulk and transport waste to the proposed ERF.

6. Air quality

WR6: Air Quality Impacts

- 6.1. It is evident from Chapter 7 of the Environmental Statement (ES) that the REP will emit over four times as much nitrogen oxides as currently emitted by the adjacent existing RRRF and Crossness Sewage Sludge Incinerator (CSSI) combined. Emissions of arsenic will double, while emissions of other pollutants will increase by 10% to 80%. The results show 'large' increases in exposure to arsenic and nickel for people living in Havering, but the assessment of significance of likely effects is not considered to be consistent with the National Policy Statement (NPS).
- 6.2. Use of the proposed Best available techniques Reference document (BREF) as the basis for modelling is of great concern, as adoption of the proposed BREF is uncertain and therefore the actual permitted limits may be 67 – 100% higher; as such, the development consent could be granted based on incorrect information.
- 6.3. The traffic modelling does not always consider worst case receptors along the A206. It is therefore unclear whether the effects of the scheme would be consistent with the London Plan.
- 6.4. The ES fails to address potential impacts at planned high buildings in nearby Opportunity Areas, which is potentially in conflict with the draft London Plan.
- 6.5. The proposed development also lies within the Bexley Air Quality Management Area (AQMA) and will have impacts on the Havering AQMA. The extent of the modelled impacts on air quality means that many local residents would be affected by emissions from the plant. Given the extent of the impacts, the GLA believes that the adverse effects would be significant.

WR7 Construction Traffic

- 6.6. TfL has identified concerns with regard to construction traffic on the local road network, including effects on bus services and queries the assumptions used. It also considers that the impact of the Electrical Connection has been insufficiently assessed.
- 6.7. TfL's key concern in relation to the proposed mitigation is the lack of detail on construction traffic impact offered by the Applicant and the lack of commitment to mitigation measures within the outline Construction Traffic Management Plan.

7. Conclusion

7.1. The GLA considers that the proposed REP is not in compliance with NPS EN-1 and NPS EN-3 in a number of respects. Notwithstanding the REP's lack of compliance with the relevant NPSs, the GLA considers that the adverse effects of the development, in particular the ERF, would outweigh the purported benefits of the REP. In this regard, the GLA consider that, in accordance with section 104(7) PA 2008, there is no requirement to determine the application in accordance with the NPSs.

for further information, contact the GLA:

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