

Riverside Energy Park, Belvedere

In the London Borough of Bexley

Planning Inspectorate reference: EN010093

Local Impact Report Summary

1. Context

- 1.1. The proposed application for the Riverside Energy Park (REP) includes an Energy Recovery Facility (ERF), Anaerobic Digestion facility, solar PV and battery storage that would be developed adjacent to the applicant's existing Riverside Resource Recovery Incineration Facility (RRRF) in LB Bexley.
- 1.2. The present response is a summary of the full Local Impact Report. Both documents are confined to issues that are considered to be of strategic importance to the implementation of national and local policy within the Greater London area.
- 1.3. The Mayor opposes the proposed REP development; however, the present document and the full LIR include a preliminary indication of issues that the Mayor would wish to see adopted as Requirements, should development consent be granted by the Secretary of State. The LIR has been prepared by the GLA and incorporates matters relevant to TfL.

2. Issues of strategic importance

- 2.1. Five issues of strategic importance have been identified: energy, carbon, waste, air quality and transport, which are considered in turn

3. Energy

3.1. This section identifies relevant policy for London with regard to energy generation. Under the Greater London Authority Act 2007 the Mayor has a legal responsibility to address climate change. 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 sources, i.e. non-fossil, can be considered renewable.

London Plan

3.2. Policy 5.1 sets out the Mayor's target of an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. Policy 5.5 recognises the value of localised decentralised heat and power networks to help achieve this target.

3.3. Whilst the DCO application appears to conform with the principles of decentralised energy set out in the London Plan, it is unclear as to how the proposed ERF would be able to operate as an effective CHP plant (see Written Representations WR1 Heat Offtake).

3.4. Policy 5.7 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.

Draft London Plan

3.5. The draft London Plan is similarly supportive of all developments to maximise opportunities for on-site electricity and heat production, including solar technologies.

3.6. Policy SI3 encourages planning for onsite energy infrastructure for new developments. Work undertaken by London Borough of Bexley (LBB) and the GLA¹ shows that the projected heat demand in the area could be met entirely by the existing RRRF.

London Environment Strategy (LES)

3.7. Objective 6.2 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, including waste heat.

¹ Thamesmead and Belvedere Heat Network Feasibility Study: Work Package 1, London Borough of Bexley, December 2018

Carbon

London Plan

- 3.8. Policy 5.17 sets a performance standard for facilities generating energy from waste in London, known as the Carbon Intensity Floor (CIF). This level is presently 400grams CO₂ per kilowatt hour of electricity produced and can only be met from traditional mass burn EfW facilities where both heat and power are generated.

Draft London Plan

- 3.9. The draft London Plan also requires conformity with the CIF standard for new EfW capacity at policy S18. Without CHP, technologies used must be able to achieve high efficiencies. The Mayor has not been provided with any evidence to support that the applicant's stated efficiencies are achievable.

London Environment Strategy

- 3.10. Chapter 7 is concerned with waste, which includes a carbon-based approach and commitment to accelerate London's transition to a low carbon circular economy.
- 3.11. Proposal 7.3.2.b of the LES specifically relates to energy from waste and sets out how such proposals can meet the CIF through technology choice, pre-treatment of waste feedstock and using energy generation facilities generating both heat and power. The LES provides further detail with regard to the CIF, including how it will be tightened in the near future to around 300 grams per kWh of electricity produced. The LES expects all EfW facilities to manage truly non-recyclable waste and operate in CHP mode to meet the CIF

4. Waste

London Plan

- 4.1. The London Plan commits to the principle of net self sufficiency for London's waste (Policy 5.16).
- 4.2. With regard to waste capacity, criteria set out in Policy 5.17 include a requirement for proposals to meet the CIF, consider all waste transport impacts, maximise use of the Blue Ribbon Network and use technologies that produce CHP.

Draft London Plan.

- 4.3. Chapter 9 sets the Mayor's commitment to sustainable waste management including a recycling target for municipal waste of 65% recycling / composting by 2030. It states (paragraph 9.7.3A) that *"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"*.
- 4.4. Part C of policy S18 supports development proposals that contribute towards renewable energy generation and provide CHP, particularly renewable gas technologies.

4.5. Part D of policy S18 sets out detailed criteria for the assessment of new waste capacity in terms of scale and location, skills and training, achieving a positive carbon outcome, and transport.

4.6. The Draft London Plan identifies at paragraph 9.8.13 specific steps that developers should take to demonstrate deliverability of CHP.

London Environment Strategy

4.7. The LES sets out the Mayor's plans for London to accelerate to a low carbon circular economy, where as much value as possible is extracted from resources before they become waste.

5. Transport

London Plan

5.1. 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.

Draft London Plan

5.2. The Draft London Plan(Policy S18) expects proposals for new waste infrastructure to take account of transport and environmental impacts of all vehicle movements related to the proposal.

6. Air Quality

London Plan

6.1. 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.

6.2. Policies 5.7 and 7.14, seek to avoid any adverse impacts of air quality, to achieve reductions in pollutant emissions and minimise public exposure to pollution. Policy 7.14. requires development proposals to 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)). The whole of the boroughs of Bexley and Havering are AMQAs.

Draft London Plan

6.3. The 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

6.4. Policy S11 states that: *"London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced"*. Policy S11 requires that development proposals should not lead to a further deterioration in air quality or 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.

London Environment Strategy

6.5. Chapter 4 is focused on air quality and, in particular, requires a reduction in particulate matter and nitrogen dioxide.

7. Development Consent Requirements

7.1. The GLA and TfL have commented on the Applicant's draft requirements that relate to strategic matters in set out in Sections 4 to 8 of this document. Notwithstanding the overall objection to the proposed development, the GLA propose additional requirements or commitments, without which development consent should not be granted. Issues addressed include:

- construction traffic management plan;
- operational worker travel plan;
- a commitment to CHP delivery, including investment in heat offtake infrastructure;
- use of river transport for delivery of ERF feedstock (maximum percentage of road delivery), including allowing for jetty outages;
- road deliveries to have zero pollution;
- pre-treatment of waste to remove recyclable waste;
- limiting emissions to the draft BREF limits;
- control of emissions for mobile plant during construction;
- export of gas from the Anaerobic Digestion facility, or gas to grid electricity generation;
- commitments on skills training and apprenticeship opportunities; and
- sufficient measures to address flood risk and biodiversity issues identified by the Environment Agency in its Relevant Representation.

In addition, the GLA and TfL would wish to see consideration given to the following issues:

- transport for deliveries of waste and export of ash to be zero carbon;
- commitment to payments to mitigate bus service disruption;
- use of biogas for district heating or vehicle fuel; and
- commitment to pay the London Living Wage as a minimum.

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