

Riverside Energy Park

Applicant's response to the Local Impact Report by Greater London Authority

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1 Applicant's response to the Local Impact Report by the Greater London Authority

1.1 Introduction

1.1.1 The Greater London Authority (GLA) has submitted a Local Impact Report (LIR) at Deadline 2 of the Examination (**REP2-076**).

1.1.2 As stated in Paragraph 1.7 of the LIR (**REP2-076**), the GLA's response is confined to issues that are considered to be of strategic importance to the Mayor and, as such, does not follow the "*Content of the LIR*" headings in PINS Advice Note 12. Furthermore, the Applicant acknowledges that TfL "*subscribes*" to the views set out within the GLA's LIR with regard to transport issues (see Paragraph 1.6 of the LIR (**REP2-076**)).

1.1.3 GLA (and TfL, with respect to Transport) have raised the following topics within their LIR:

- Energy;
- Carbon;
- Waste;
- Transport;
- Air Quality; and
- DCO Requirements.

1.1.4 The Applicant's response (this document) covers each of these issues in turn below.

1.2 Planning Policy Context

1.2.1 The Applicant notes the planning policies and strategies summarised in Section 2 of the LIR. Relevant planning policy is identified in GLA's LIR on a topic-by-topic basis and the Applicant's response to policy is considered in a similar way in **Tables 1 to 7** below.

1.2.2 The relevant planning policy is considered in the **Planning Statement (7.1, APP-102)**, the **Project and its Benefits Report (PBR) (7.2, APP-103)**, the **Combined Heat and Power (CHP) Assessment (5.4, APP-035)** and the **Environmental Statement (ES), (6.1, APP-038-APP-055 as revised by REP2-013 – REP2-032)** submitted with the DCO Application.

1.3 Response to GLA's LIR on a topic by topic basis

1.3.1 The Applicant's response to the GLA's LIR is structured as follows:

- **Table 1:** provides the Applicant's response to Sections 3 to 7 of the GLA's LIR summary (**REP2-076**);
- **Table 2:** provides the Applicant's response to Section 5 – Energy of the GLA's LIR (**REP2-075**);

- **Table 3:** provides the Applicant's response to Section 6 – Carbon of the GLA's LIR (**REP2-075**);
- **Table 4:** provides the Applicant's response to Section 7 – Waste of the GLA's LIR (**REP2-075**);
- **Table 5:** provides the Applicant's response to Section 8 – Transport of the GLA's LIR (**REP2-075**);
- **Table 6:** provides the Applicant's response to Section 9 – Air Quality of the GLA's LIR (**REP2-075**); and
- **Table 7:** provides the Applicant's response to Section 10 – Commentary on DCO requirements of the GLA's LIR (**REP2-075**).

Table 1: Applicants comments on GLA's LIR Summary

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Energy		
<i>London Plan</i>		
3.2-3.3	<p>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.</p> <p>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).</p>	<p>The Applicant agrees that REP conforms with the principles of decentralised energy set out in the London Plan.</p> <p>As explained in the Combined Heat and Power Report (5.4, APP-035) and the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), and as further explained in the Applicant's response to the GLA Written Representations (WR) (8.02.14, submitted at Deadline 3), the Applicant is applying for a "CHP-Enabled" generating station, which is a higher state of readiness than "CHP Ready", as all the on-site infrastructure necessary to connect to a heat distribution network are included in Schedule 1 to the draft Development Consent Order (dDCO) (3.1, Rev 2) submitted at Deadline 3. There is extensive heat demand locally.</p> <p>Given the REP site is located in a Heat Network Priority Area and the catchment area for heat from REP includes two opportunity areas (Thamesmead and Abbey Wood OA and Bexley Riverside OA), the Applicant asserts that the REP site is a prime site for low carbon generation that has the likely potential to provide heat to buildings and consumers via a heat network, which the Mayor of London deems provide competitive solutions.</p>
3.4	<p>Policy 5.7 seeks to increase the proportion of energy generated from renewable sources. The proposed Anaerobic Digestion facility and solar</p>	<p>The Applicant agrees with the GLA that the Proposed Development is in accordance with Policy 5.7 of the adopted London Plan.</p>

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	<p>PV panels would provide renewable energy and are consistent with this policy.</p>	
<i>Draft London Plan</i>		
<p>3.5-3.6</p>	<p>The draft London Plan is similarly supportive of all developments to maximise opportunities for on-site electricity and heat production, including solar technologies.</p> <p>Policy SI3 encourages planning for onsite energy infrastructure for new developments. Work undertaken by London Borough of Bexley (LBB) and the GLA shows that the projected heat demand in the area could be met entirely by the existing RRRF.</p>	<p>The Applicant does not agree that the projected heat demand in the area could be met entirely by the existing RRRF.</p> <p>The Phase 2 Thamesmead & Belvedere Heat Network Feasibility Study by Ramboll¹, appended to the GLA's WR (REP2-071), does not fully consider all of the available heat demands, for example the 11,500 new home Waterfront development in Thamesmead . However, the Ramboll Study, states at paragraph 5 of Section 7, that <i>"If a more aggressive build-out scenarios are considered for both the Core Scheme and additional sites further afield, in both Bexley and Greenwich, it is likely that a further heat source(s) beyond the existing Cory plant [RRRF] would be required to meet total heat demands."</i></p> <p>This conclusion is welcomed by the Applicant. Given the Mayor's desire to tackle London's housing crisis and the Mayor's own assessment conceding that build out rates need to rapidly increase, the Applicant is surprised that the GLA does not recognise this independent conclusion that heat sources beyond RRRF are likely to be required.</p> <p>The study also recognises that the provision of supplementary heat generation and storage is required to meet year-round demand, which is proposed to comprise a</p>

¹ Thamesmead & Belvedere Heat Network Feasibility Study: Work Package 1, Ramboll, 6 December 2018

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		<p>mix of centralised and distributed plant. The opportunity for synergy between RRRF and REP offers a further benefit in this regard, since any back-up supply from a low carbon renewable source could be used to displace conventional fossil fuelled back-up plant.</p>
<p><i>London Environment Strategy (LES)</i></p>		
<p>3.7</p>	<p>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.</p>	<p>REP is compliant with Objective 6.2. The ERF would generate power and heat from partially renewable sources. The solar panels would generate power from renewable sources. The Anaerobic Digestion plant would be configured to produce vehicle fuel from renewable sources, or to generate power and heat.</p>
<p>Carbon</p>		
<p><i>London Plan</i></p>		
<p>3.8</p>	<p>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.</p>	<p>REP is compliant with Policy 5. 17 of the Adopted London Plan. The LIR summary does not present the full policy, which states "<i>Facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum CO₂eq performance of 400 grams of CO₂eq per kilowatt hour (kwh) of electricity produced.</i>" There are two important points here. First the current policy is for plant to meet a carbon intensity floor of 400 grams of CO₂eq per kilowatt hour. And second, the Policy permits a plant to demonstrate how it will achieve a carbon intensity floor of 400 grams of CO₂eq per kilowatt hour, which indicates that a plant could have a higher carbon intensity floor provided it can show the steps that are in place to reduce that floor to the required minimum performance.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>As demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the ERF achieves a CIF of 400 grams of CO₂eq per kilowatt hour when operating in power-only mode, as calculated using the GLA's spreadsheet tool provided directly to the Applicant for this purpose and using the GLA's base waste for London. This is achieved because the ERF will be the most efficient EfW plant in the UK. It is anticipated that the ERF will also export heat, which will reduce the CIF score further.</p> <p>Even if the ERF did not meet the current target, demonstrable steps have been put in place to export heat and thus reduce the CIF, as demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012).</p>
<i>Draft London Plan</i>		
3.9	<p>The draft London Plan also requires conformity with the CIF standard for new EFW capacity at policy SI8. 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.</p>	<p>As stated in the Applicant's response to paragraph 3.8, REP conforms with the CIF standard.</p> <p>The Applicant notes that the design of the ERF has been developed with an industry-leading supplier. Technical provisions which enable this level of efficiency to be achieved include:</p> <ul style="list-style-type: none"> • high live steam conditions made possible by the use of Inconel clad boiler passes and superheaters; • multi-pass out steam turbine providing optimised steam pressures for condensate pre-heating, district heating, feedwater deaeration and combustion air (primary and secondary) pre-heating; • flue gas recirculation; • commitment to procure high efficiency steam turbine from market leading supplier;

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<ul style="list-style-type: none"> • flash steam recovery from blow down vessel; and • flue gas heat recovery to preheat condensate.
<i>London Environment Strategy (LES)</i>		
3.10-3.11	<p>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.</p> <p>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.</p>	<p>While the LES expects that it will be necessary for EfW plants to operate in CHP mode to meet the CIF, the Applicant notes that the only policy test is to meet the CIF. If this can be achieved using power-only, then this is sufficient since the plant would achieve the environmental outcome sought by the policy. However, the ERF is expected to export heat, as explained earlier, and so will operate in CHP mode.</p> <p>Page 324 of the LES states, <i>"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."</i> There is therefore no definitive position on the time or extent of any potential CIF threshold reduction, but what is clear is that the current policy is for a carbon intensity floor of 400 grams of CO₂eq per kilowatt hour and that has been reinforced by the Mayor as recently as May 2018. Whilst the GLA may have a future aspiration to review and possibly lower the carbon intensity floor, developments cannot be governed by such aspirations as otherwise there would be no point in policy.</p>
Waste		

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
<i>London Plan</i>		
4.1-4.2	<p>The London Plan commits to the principle of net self sufficiency for London's waste (Policy 5.16).</p> <p>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.</p>	<p>The Applicant agrees with the Mayor's commitment through the London Plan to seek net self-sufficiency by 2026 and demonstrates that REP will make a positive contribution to achieving that key strategic planning policy priority.</p> <p>The Applicant is pleased to confirm that the Proposed Development accords with the criteria set out in Policy 5.17: meeting (and exceeding) the CIF target; considering all waste transport impacts; maximising use of the Blue Ribbon Network; and incorporating technologies that will deliver CHP.</p>
<i>Draft London Plan</i>		
4.3	<p>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 <i>"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</i></p>	<p>The Applicant acknowledges the Mayor's aspirational recycling target and incorporates them into the London Waste Strategy Assessment ('LWSA', Annex A of the Project and its Benefits Report 'PBR' (7.2, APP-103)).</p> <p>The LWSA (Annex A of the PBR, (7.2, APP-103)) demonstrates that delivering the policy priorities of net-self-sufficiency and 65% recycling (by 2030) requires an additional c. 900,000 tonnes of residual waste treatment capacity in London (Table 6.1, scenarios 2a, 3b, and 4). This is before considering any of the residual wastes arising in authorities surrounding London, comprising at least 1.5 million tonnes (see from paragraph 1.1.112 of the Applicant's Responses to Written Representations to the GLA's WR (8.02.14), submitted at Deadline 3.</p>

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	<i>operational”.</i>	
4.4	Part C of policy S18 supports development proposals that contribute towards renewable energy generation and provide CHP, particularly renewable gas technologies.	The Applicant is pleased to confirm that the Proposed Development is in accordance with draft London Plan policy S18 part C, delivering renewable energy generation and being CHP Enabled, not least as demonstrated in the PBR (7.2, APP-103) , the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045) and the Combined Heat and Power Supplementary Report (5.4.1, REP2-012) .
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.	<p>The Applicant is pleased to confirm that the Proposed Development is in accordance with Policy S18 part D.</p> <p>The ERF is demonstrated: to be of an appropriate activity, scale and location (not least as set out in the PBR (7.2, APP-103), the LWSA (Annex A of the PBR (7.2, APP-103)) and the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045)), provides job creation and social value benefits (as set out in the PBR (7.2, APP-103) and the Planning Statement (7.1, APP-102)) and achieves a positive carbon outcome (as set out in the PBR (7.2, APP-103), the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045), the Combined Heat and Power Supplementary Report (5.4.1, REP2-012) and the Carbon Assessment (8.02.08, REP2-059)).</p> <p>In relation to transport, REP optimises use of existing wharves at the destination and the riparian Waste Transfer Stations. This amplifies the positive effects that REP would have on the increased movement of waste by river within London – significantly reducing the need to move waste by road in large goods vehicles.</p>

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		<p>The continued and expanded use of the river for these freight movements helps to secure the future of important marine jobs at a high standard – protecting the future high standard of experienced marine personnel on the Thames.</p> <p>Furthermore, as reported in Paragraph 7.11.2 of Chapter 7 Air Quality of the ES (6.1, REP2-019), whilst the effects of emissions from river traffic are considered to be not significant, measures to reduce emissions from the current fleet of tugs are being investigated by the Applicant. These include the use of bio-fuels/synthetic fuels, retrofitting additional scrubber technology and optimising operational practices to increase efficiency. Any tugs acquired in the future would, as a minimum, be required to comply with relevant marine emissions standards and legislation applying at that time. However, the Applicant's preference is to adopt hybrid technology for any new tugs subject to operational viability and regulatory approval.</p>
4.6	The Draft London Plan identifies at paragraph 9.8.13 specific steps that developers should take to demonstrate deliverability of CHP.	The Applicant is pleased to confirm that the Proposed Development delivers the demonstrable steps set out at paragraph 9.8.13, not least as demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012)
<i>London Environment Strategy</i>		
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.	The Applicant is pleased to confirm that REP delivers the circular economy, recovering both energy and secondary materials from residual wastes. By diverting these wastes from landfill they are kept at their highest value for as long as possible; the recovery of secondary materials avoids the impacts generated by the extraction and use of raw materials; whilst the digestate resulting from the Anaerobic Digestion facility is a recognised soil conditioner that also bring carbon benefits.

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Transport		
<i>London Plan</i>		
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.	The Applicant is pleased to confirm that the operation of REP would be wholly in accordance with Policy 6.14 of the London Plan – operating as a riparian facility receiving material from other riparian wharves on the Thames. This would continue to facilitate the movement of freight away from London's roads to optimise the use of existing marine operations and lighterage, as is fully supported by the PLA. Requirement 14 of the draft Development Consent Order (3.1, Rev 2 submitted at Deadline 3) restricts the number of heavy commercial vehicles delivering waste to the ERF and the Anaerobic Digestion plant.
<i>Draft London Plan</i>		
5.2	The Draft London Plan (Policy SI8) expects proposals for new waste infrastructure to take account of transport and environmental impacts of all vehicle movements related to the proposal.	<p>Chapter 6 Transport of the ES (6.1, REP2-017) and Appendix B.1, the Transport Assessment to the ES (6.3, APP-066) have assessed the impacts of all modes of travel associated with the construction, operation and demolition of REP. Supplementary information and evidence have been provided through the Applicant's Response to Relevant Representations (8.02.03, REP2-054) to the Relevant Representations of TfL (see RR-087). That evidence includes technical notes at Appendices F and G of the Applicant's Response to Relevant Representations (8.02.03, REP2-054) which consider the implications of peak construction travel on the A2016/A206 corridor and the likely implications of the construction of the Electrical Connection on the A2016/A206 in Bexley.</p> <p>The Applicant also responds to the Relevant Representation of Newell Projects Ltd on Behalf of Arriva London (see RR-055) and includes confirmation on the selection of the Electrical Connection corridor and an indication of the lesser</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>impact on bus services (see the Applicant's Response to Relevant Representations (8.02.03, REP2-054)).</p> <p>During the construction phase, the Applicant will continue to take into account the environmental effects of vehicle movements related to the construction of the REP site and the Electrical Connection, through the management processes within the updated Code of Construction Practice (secured by Requirement 11 of the dDCO (3.1, Rev 2, submitted at Deadline 3)) and the implementation of an approved Construction Traffic Management Plan substantially in accordance with the Outline Construction Traffic Management Plan (6.3, Rev 2, submitted at Deadline 3) and (secured by Requirement 13 of the dDCO (3.1, Rev 2, submitted at Deadline 3)).</p> <p>An Operational Worker Travel Plan will focus on the movement of people during operations at REP. That document is secured through Requirement 15 of the dDCO (3.1, Rev 2, submitted at Deadline 3).</p>
Air Quality		
<i>London Plan</i>		
6.1-6.2	<p>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.</p> <p>Policies 5.7 and 7.14, seek to avoid any adverse impacts of air quality, to</p>	<p>Policy 5.7 on Renewable Energy states: "<i>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</i>". Chapter 7, Air Quality of the ES (6.1, REP2-019) shows that there are no significant effects on biodiversity and the natural environment and no adverse impacts on air quality. REP is therefore compliant with the requirements of Policy 5.7.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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 (AQMs)). The whole of the boroughs of Bexley and Havering are AMQAs.</p>	<p>Policy 7.14 has 5 elements (a-e) which are set out in Paragraph 9.4 of the GLA's LIR. The Applicant's response to each point is:</p> <p>a. The reference to exposure to existing poor air quality is primarily related to development proposals that introduce new vulnerable receptors into existing areas of poor air quality (which the Proposed Development does not). In terms of the Proposed Development's contribution to increasing exposure to pollution; the ES demonstrates that there are no significant effects on air quality.</p> <p>b. The requirements to control dust and emissions from demolition and construction is covered in Requirement 11 of the dDCO (3.1, Rev 2, submitted at Deadline 3).</p> <p>c. Air quality neutral standards are defined in terms of different types of residential and commercial developments in London, but there are applicable benchmarks for an industrial facility such as REP. The ES has demonstrated that there are no exceedances of National Air Quality Strategy Objectives in the AQMs in the vicinity of the REP site.</p> <p>d. Emissions from REP will be controlled by the Environmental Permit and abatement is provided on-site.</p> <p>e. No biomass boiler is included in the Proposed Development.</p> <p>In addition, whilst Air Quality Management Areas (AQMs) are indicative of locations where poor air quality may exist; not all locations within an AQMA will have pollutant concentrations above National Air Quality Strategy Objectives. This is especially true where whole boroughs have been declared an AQMA (as in the case of Bexley and Havering) and in reality, poor air quality is restricted to alongside the main road corridors in the borough. Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives in any of the AQMs in the vicinity of the</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		REP site and therefore the development does not impact upon areas of poor air quality. The Proposed Development is therefore compliant with Policy 7.14.
<i>Draft London Plan</i>		
6.3-6.4	<p>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.</p> <p>Policy SI1 states that: <i>"London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced"</i>. Policy SI1 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.</p>	<p>Chapter 7, Air Quality of the ES (6.1, REP2-019) shows that the impact of emissions from the ERF is Negligible for NO₂, PM₁₀ and PM_{2.5}. There are no predicted exceedances of air quality limits for these pollutants, no delay to compliance with the limits and no new areas of exceedance created. The Proposed Development is therefore compliant with the requirements of Policy SI1.</p>
<i>London Environment Strategy (LES)</i>		
6.5	Chapter 4 is focused on air quality and, in particular, requires a reduction in	As stated in the GLA LIR, Chapter 4 of the LES states: <i>"Improving London's air quality requires the following actions:</i>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	particulate matter and nitrogen dioxide.	<ul style="list-style-type: none"> • <i>reducing exposure of Londoners to harmful pollution across London – especially at priority locations like schools – and tackling health inequality</i> • <i>achieving legal compliance with UK and EU limits as soon as possible, including by mobilising action from the London boroughs, government and other partners</i> • <i>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”.</i> <p>Chapter 7, Air Quality of the ES (6.1, REP2-019) shows that the impact of emissions from the ERF is Negligible for NO₂, PM₁₀ and PM_{2.5}. For PM₁₀ and PM_{2.5}, the change in concentrations is imperceptible for all modelled receptor locations. As the Environmental Permit application has been based on a NO_x emission concentration of 75mg/Nm³ and the DCO application has been made with a NO_x emission concentration of 120mg/Nm³ the actual impacts of the ERF on NO₂ concentrations will be lower than modelled for the DCO.</p>
DCO Requirements		
7.1	The GLA and TfL have commented on the Applicant's draft requirements that relate to strategic matters as 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	<p>The Applicant has provided comments on the GLA's and TfL's suggested amendments. The Applicant does not accept that development consent should only be granted on the terms set out by the GLA and TfL, especially given that there is no national (NPS), regional (London and Kent County Council) or Local (Bexley and Dartford) planning policy justification for many of the suggestions.</p> <p>The Applicant responds to the GLA's and TfL's suggestions in Table 7 below.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>development consent should not be granted. Issues addressed include:</p> <ul style="list-style-type: none"> • 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; 	

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<ul style="list-style-type: none"> • 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. <p>In addition, the GLA and TfL would wish to see consideration given to the following issues:</p> <ul style="list-style-type: none"> • 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. 	

1.4 Energy

Table 2: Applicants comments on Section 5 – Energy of the GLA's LIR

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Section 5 – Energy		
<i>London Plan</i>		
5.2	Under the Mayor of London Act (2008) the Mayor has a legal responsibility to address climate change. The Mayor's principal vehicles for addressing climate change and energy issues are the London Plan (including the draft London Plan) and the London Environment Strategy (LES).	The Applicant notes this comment.
5.3	The London Plan 2016 sets out a vision for sustainable development over the years to 2036 and beyond, that London should <i>“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”</i> .	The Applicant supports the GLA's vision for sustainable development.
5.4	Of the six detailed objectives that support this vision, the following is directly relevant: <i>“A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing</i>	

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<i>pollution, developing a low carbon economy, consuming fewer resources and using them more effectively”.</i>	
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.	The Applicant notes that Chapter 5 of the London Plan is concerned with climate change. REP will lead to a carbon saving of around 137,000 tonnes CO ₂ -equivalent per annum in power-only mode in comparison to landfill, as demonstrated in the Carbon Assessment (8.02.08, REP2-059) , and this carbon saving will increase if heat is also exported
5.6	<i>The London Plan recognises the value of localised decentralised energy (DE) heat and power networks to help achieve this target.</i> 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.	The Applicant notes that the London Plan supports district heating networks. This policy cannot be achieved without facilities such as REP. Both the findings of the Phase 2 Thamesmead & Belvedere Heat Network Feasibility Study by Ramboll ² , funded through the Mayor's Decentralised Energy Enabling Project (DEEP), and the Applicant's own heat demand analysis (see Combined Heat and Power Assessment (5,4, APP-035) and Combined Heat and Power Supplementary Report (5.4.1, REP2-012)), demonstrates that there is need for heat supply from both REP and RRRF to meet projected demands resulting from publicly announced developments.
5.7	Paragraph 5.32 of the London Plan makes clear that <i>“renewable energy DE opportunities including the use of energy from waste and biomass schemes are also supported”</i> as part of a network of supply supported by planned development.	

² Thamesmead & Belvedere Heat Network Feasibility Study: Work Package 1, Ramboll, 6 December 2018

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
5.8	<p>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).</p>	<p>The Applicant considers that evidence to demonstrate that there would be sufficient foreseeable heat demand in the local area can be found in the Combined Heat and Power Report (5.4, APP-035) and the Supplementary Combined Heat and Power Report (5.4.1, REP2-012). Further details can be found in the response to the GLA's Written Representations within the Applicant's Responses to Written Representations (8.02.14). The Applicant also refers to the supporting letter from Peabody, who are driving forward the regeneration of Thamesmead, in Appendix A to the Supplementary Combined Heat and Power Report (5.4.1, REP2-012).</p>
5.9	<p>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).</p>	<p>National Policy is clear that the ERF is partially renewable and is supported by policies which encourage the use of energy generated from renewable sources.</p> <p>The Applicant's view of compliance with the National Policy Statements on this issue has been supported in multiple planning decisions including the DCO decisions of North London Heat and Power Project, Rookery Energy Recovery Facility and Ferrybridge Energy Recovery Facility.</p> <p>Further details are provided in the Applicant's Responses to Written Representations (8.02.14) to the GLA's WR (REP2-071).</p>
5.10	<p>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</p>	<p>The Applicant does not dispute that only part of the waste stream is renewable, and that is why the Applicant has referred to REP as both low carbon and renewable. Furthermore, this is accepted in policy, as demonstrated in the Applicant's response to the GLA WR in the Applicant's Responses to Written</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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 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%.</p>	<p>Representations (8.02.14)).</p> <p>However, the Applicant does not agree with the GLA's interpretation and characterisation of REP in this regard. The Carbon Assessment (8.02.08, REP2-059) considered four waste compositions, including one following the removal of plastics from the waste stream, and all four had a biocarbon content of more than 50% (see Table 1 of the Carbon Assessment (8.02.08, REP2-059)). The analysis referred to in Paragraph 3.2.5 of the Project and its Benefits Report (7.2, APP-103) is from the carbon emission assessment prepared for the operational RRRF and which is presented in Appendix A of the Carbon Assessment (8.02.08, REP2-059). This had a biogenic content of 54% in mass terms.</p> <p>Whilst it is therefore reasonable to conclude that the biocarbon content of REP will be higher than 50% at first operation in 2024 (and thus it is a conservative assumption to assume that the ERF element of REP will be at least 50% renewable), this ultimately does not affect the policy position as set out in the Applicant's Response to the GLA's WR (see the Applicant's Responses to Written Representations (8.02.14)), which is that REP accords with the Energy NPSs. The proposed battery storage facility would be charged by a combination of the renewable and low carbon generating assets at REP, thereby offering renewable and low carbon energy provision itself. The battery storage facility also supplements the wider deployment of intermittent renewables (for example wind and solar) since it enables demand shifting of energy supply to the grid, which helps to maximise the contribution of renewables to the overall</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		energy mix.
5.11	<p>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 <i>“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”</i>. 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.</p>	<p>The policy may express a preference for advanced conversion technologies but is not predicated on their use. The ERF uses innovative technology to deliver increased plant efficiency and minimised environmental impacts, as demonstrated in the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045).</p> <p>REP will lead to a carbon saving of around 137,000 tonnes CO2-equivalent per annum in power-only mode in comparison to landfill, as demonstrated in the Carbon Assessment (8.02.08, REP2-059), and this carbon saving will increase if heat is also exported</p>
<i>Draft London Plan</i>		
5.12	<p>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.</p>	Noted.
5.13	<p>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</p>	<p>REP fully accords with policy SI2 of the draft London Plan; not least as an energy generating station it will generate more energy than is required on site and export the excess. In operation it will reduce greenhouse gas emissions and</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	<p>minimise both annual and peak energy demand. Reduced greenhouse gas emissions are achieved through REP incorporating the ERF, the Anaerobic Digestion facility and Solar Photovoltaic Arrays; this range of renewable/low carbon energy sources means that the development will be self-sufficient in energy demand and be a provider of renewable/low carbon energy off-site, including the potential for heat. Further, the ERF will divert residual waste from landfill, resulting in the minimisation of greenhouse gas emissions. This is most clearly set out in the Carbon Assessment (8.02.08, REP2-059) which concludes (at paragraph 5.1.2) that <i>'the base case for the assessment show that the benefit of the REP ERF compared to landfill is about 137,000 tonnes of CO₂-equivalent per year, or about 229 kg CO₂e per tonne of waste processed'</i>. Paragraph 5.1.3 confirms that <i>'if heat is exported, this benefit increases to 157,000 t CO₂e or 263 kg CO₂e per tonne of waste processed.'</i> Finally, REP incorporates battery storage, which will enable peaks and troughs in energy demand to be minimised and provide greater resilience to energy supply.</p>
5.14 – 5.15	<p>Policy SI3 Energy infrastructure includes a requirement for boroughs and developers <i>"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"</i>. 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</p>	<p>REP is a key element of the ability to achieve policy SI3, being an energy generation facility that will recover renewable/low carbon energy. In addition, REP incorporates battery storage. Given the REP site is located in a Heat Network Priority Area and the catchment area for heat from REP includes two opportunity areas (Thamesmead and Abbey Wood OA and Bexley Riverside OA), the Applicant asserts that the REP site is a prime site for low carbon generation that has the likely potential to provide heat to buildings and consumers via a heat network, which the Mayor of London deems provide</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>heating and cooling networks.</p> <p>Part D of Policy SI3 states: <i>“Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system</i> <i>1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:</i> <i>a) connect to local existing or planned heat networks</i> <i>b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required</i> <i>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)</i> <i>f) use ultra-low NOx gas boilers.</i> <i>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)</i> <i>3) where a heat network is planned but not yet in existence the development should be designed for connection at a later date.”</i></p>	<p>competitive solutions. The ERF will be CHP-Enabled, which means that it is ready to be connected to a district heat network with the necessary infrastructure to the site boundary forming part of the "authorised development" in Schedule 1 to the dDCO (3.1, Rev 2, submitted at Deadline 3). REP provides the infrastructure necessary to deliver energy generation, storage and heat for onward distribution.</p>
5.16	<p>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</p>	<p>The Applicant notes that the REP site is in a Heat Network Priority Area as designated by the GLA. Given the REP site is located in a Heat Network Priority Area and the catchment area for heat from REP includes two opportunity areas (Thamesmead and Abbey Wood OA and Bexley Riverside OA),</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	Heat Map which was updated in December 2017 (previously called 'areas of decentralised energy potential').	the Applicant asserts that the REP site is a prime site for low carbon renewable generation that has the likely potential to provide heat to buildings and consumers via a heat network, in a location which the Mayor of London deems provide competitive solutions.
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).	<p>As noted in the Applicant's Responses to Written Representations (8.02.14) to the GLA WR, the Applicant welcomes Ramboll's view of the benefits and viability of delivering a heat network.</p> <p>Ramboll's Phase 2 feasibility study concludes that there is potential to deliver a commercially viable heat network which would offer carbon savings over the counterfactual cases of new air source heat pump plant or gas-fired CHP led communal heating schemes. The Applicant welcomes Ramboll's view of the benefits and viability of delivering a heat network.</p> <p>Ramboll's Phase 2 feasibility study recognises that the provision of supplementary heat generation and storage is required to meet year-round demand which is proposed to comprise a mix of centralised and distributed plant. Ramboll also states at paragraph 5 of Section 7, that "<i>If a more aggressive build-out scenarios are considered for both the Core Scheme and additional sites further afield, in both Bexley and Greenwich, it is likely that a further heat source(s) beyond the existing Cory plant [RRRF] would be required to meet total heat demands.</i>" This conclusion is welcomed by the Applicant. Given the Mayor's desire to tackle London's housing crises and the Mayor's own assessment conceding that build out rates</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>need to rapidly increase, the Applicant is surprised that the GLA does not recognise this independent conclusion that heat sources beyond RRRF are likely to be required.</p> <p>It is therefore evident that a realistic build-out scenario, and in order to meet the Mayor's own ambitions, would require heat provision from both REP and RRRF. Ramboll has identified a total heat demand of 141 GWh/annum "<i>for all potential connections</i>" which, based on a residential led network, may necessitate an additional source of heat on this basis alone. This is because heat demand resulting from residential led networks are highly variable in nature, undergoing both seasonal and diurnal variation due to heat consumption patterns. Even with incorporation of a proportionately high level of thermal storage, allowance must be made for variations in heat demand. In any case, at paragraph 2 of Section 7 of Ramboll's Phase 2 feasibility study, back-up requirements are reported as a necessity and the benefits of connecting both facilities to a network would offer the optimum case in terms of low carbon heat year round, in addition to displacing air quality impacts in close proximity to residential areas.</p> <p>This independent report supports the Applicant's own assessment of CHP demand in the area of the REP site. As required by NPS EN-1, paragraph 4.6.7, opportunities for future CHP demand is a criterion that should be adopted when considering locations for a project. Given the REP site is located in a Heat Network Priority Area and the catchment area for heat from REP includes two opportunity areas</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		(Thamesmead and Abbey Wood OA and Bexley Riverside OA), the Applicant asserts that the REP site is a prime site for low carbon generation that has the likely potential to provide heat to buildings and consumers via a heat network, which the Mayor of London deems provide competitive solutions.
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.	The Applicant notes GLA's support for Solar PV at REP.
5.19	Paragraph 9.3.11 states that " <i>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</i> ". The proposed energy storage element of the REP is in conformity with the draft London Plan in this regard.	The Applicant notes GLA's support for Battery Storage at REP.
<i>London Environment Strategy (LES)</i>		
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,	Noted.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	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.	Noted.
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 NOx 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.	The first two sentences are noted. The Applicant does not consider that the third sentence applies to REP. The NOx emissions from the gas engines have been fully considered in the air quality assessment in Chapter 7, Air Quality of the ES (6.1, REP2-019). Also, the gas engines at REP will be located remotely from potential receptors whereas the domestic boilers promoted by the GLA would be very close to receptors.
5.23	The LES commits to delivering more decentralised energy in London and recognises that there is the opportunity to	REP is a decentralised source of renewable/low carbon energy using both residual wastes and sunshine as the fuels. Further,

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	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.	REP is located in a Heat Network Priority Area, with great potential to provide the source of heat to local regeneration projects (which include social housing). REP fully complies with this objective of the LES.
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.	The Applicant notes GLA's support for Solar PV.
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.	The Applicant notes GLA's support for Battery Storage at REP.
<i>Other Policies and Strategies</i>		
5.26	The Mayor's Zero Carbon London: A 1.5C Compatible Plan underpins the LES and shows how London can meet	Noted. As stated above, REP is entirely consistent with policy

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	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.	on climate change, reducing emissions of greenhouse gases.
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.	Noted. As stated above, REP is entirely consistent with policy on climate change, reducing emissions of greenhouse gases.

1.5 Carbon

Table 3: Applicants comments on Section 6 – Carbon of the GLA's LIR

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Section 6 – Carbon		
<i>London Plan</i>		
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	As set out in the Carbon Assessment (8.02.08, REP2-059) , the Proposed Development will reduce emissions of greenhouse gases.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	
6.3	<p>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:</p> <p><i>“achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recycles 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 CO2eq performance of 400 grams of CO2eq 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</i></p>	See response to paragraph 6.4 below.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	5.85 below)".	
6.4	<p>The supporting text for this policy explains the development of this performance standard as follows:</p> <p><i>"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 CO2 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-most-of-Waste.</i></p> <p><i>"5.85A The carbon intensity floor has been</i></p>	<p>The Applicant has used the latest, unpublished, version of the ready reckoner tool, as provided to the Applicant by the GLA, to calculate the CIF performance. As stated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the ERF achieves a CIF of 400 in power-only mode and this reduces with heat export.</p> <p>In addition, demonstrable steps to develop heat export opportunities have been taken, as set out in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012).</p> <p>Therefore, the Applicant is compliant with this policy. Notwithstanding the position that the ERF will meet the CIF of 400, the Applicant is actively delivering the specific examples provided in policy 5.85B to ensure carbon performance is maximised. For example, the Applicant has committed to the development of a heat distribution network to the site boundary (as secured through Requirement 20 in Schedule 2 of the dDCO (3.1, Rev 2) submitted at Deadline 3) and has established and is taking an active role in a working group to progress the agreed steps (the Bexley District Heating Partnership Board).</p> <p>Therefore, the Applicant is compliant with this policy.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>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</i></p>	

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>iterations of the London Plan.</i></p> <p><i>“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 to meet the min CO2 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.</i></p> <p><i>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”.</i></p>	
6.5	<p><i>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</i></p>	<p>The Applicant has provided a detailed response to the GLA's WR (WR3: Carbon) in the Applicant's Responses to Written Representations (8.02.14).</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>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).</i></p>	
<p><i>Draft London Plan</i></p>		
<p>6.6</p>	<p>The CIF policy for new waste management capacity, including the maximum level of 400g of CO₂ equivalent emissions per kilowatt hour electricity produced, has been retained in the draft London Plan. This is set out in Policy S18 <i>Waste capacity and net waste self-sufficiency</i>. Part D3) of Policy S18 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 CO₂ equivalent per kilowatt hour of</p>	<p>As demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the ERF achieves a CIF of 400 grams of CO₂eq per kilowatt hour when operating in power-only mode, as calculated using the GLA's spreadsheet tool provided directly to the Applicant for this purpose and using the GLA's base waste for London. This is achieved because the ERF will be the most efficient EfW plant in the UK. It is anticipated that the ERF will also export heat, which will reduce the CIF further.</p> <p>Notwithstanding the position that the ERF will meet the CIF of 400, the Applicant is actively delivering the specific examples provided in policy 5.85B to ensure carbon performance is maximised. See paragraph 6.4 above.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	electricity produced”.	
6.7	<p>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 <i>“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”</i>.</p>	<p>The Applicant notes the GLA's view that the CIF effectively rules out traditional mass burn incineration. The ERF will be the most efficient EfW plant in the UK and so is consistent with the GLA's aspirations to use technologies which can achieve high efficiencies.</p> <p>The Energy NPSs are technology neutral, except for a preference for energy generation that is renewable/low carbon, such as REP. Similarly, government waste policy is technology neutral, leaving it to the market to decide the most appropriate technology to meet policy objectives. Demonstrated to be a modern, and highly efficient facility, REP delivers the expectations set out the in Our Waste Our Resources: A Strategy for England, the latest strategy from government on waste management and its future role in providing a supply of renewable/low carbon energy.</p>
6.8	<p>Paragraph 9.8.12 of the draft London Plan requires that <i>“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”</i>.</p>	<p>As set out in Section 4 of the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), REP is compliant with paragraph 9.8.12 of the draft London Plan.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
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.	As set out in Section 4.2 of the Combined Heat and Power Supplementary Report (5.4.1, REP2-012) , the Applicant has assessed the carbon impact of the Proposed Development in accordance with GLA approved methodology. The Applicant has, at the GLA's request, tested the proposals using both published and unpublished Ready Reckoners, with the most recent being a version provided by the GLA in April 2019. REP will comply with the requirements of the CIF in all load cases and using any of the ready reckoner versions issued.
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.	<p>The ERF will be the most efficient EfW plant in the UK. The Applicant notes that the design of the ERF has been developed with an industry-leading supplier, with their assumptions verified by leading consultants Fichtner Consulting Engineers Limited (as was stated publically in the Issue Specific Hearing on Environmental Matters held on 5 June 2019). Technical provisions which enable this level of efficiency to be achieved include:</p> <ul style="list-style-type: none"> • high live steam conditions made possible by the use of Inconel clad boiler passes and superheaters; • multi-pass out steam turbine providing optimised steam pressures for condensate pre-heating, district heating, feedwater deaeration and combustion air (primary and secondary) pre-heating; • flue gas recirculation; • commitment to procure high efficiency steam turbine from market leading supplier; • flash steam recovery from blow down vessel; and • flue gas heat recovery to preheat condensate.
6.11	Detailed evidence in this respect is provided in the GLAs Written Representations (WR3:	The Applicant has provided a detailed response to the GLA's WR (WR3: Carbon) in

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	Carbon).	the Applicant's Responses to Written Representations (8.02.14) .
<i>London Environment Strategy</i>		
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.	Noted.
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	The Applicant agrees that injection of biogas to the gas grid, or upgrade to vehicle fuel are the preferred options, as set out in Paragraph 3.3.41 of Chapter 3 Project and Site Description (6.1, REP2-013) . However, the Applicant is aware that there may be obstacles to the preferred option, principally (in the case of injection to grid) whether there is capacity in the local gas network to facilitate biogas injection, engineering of a gas delivery pipeline and securing of relevant (off-site) consents for the installation. In the case of upgrade of biogas to compressed natural gas (CNG) vehicle fuel, there would be a need to establish a market for the sale of vehicle fuel and secure associated licenses, and/or upgrade the waste delivery vehicle fleet to operate on this fuel source, which is outside of the Applicant's control. The Applicant has therefore allowed for an option to utilise biogas to generate electricity using CHP engines, if necessary.

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	<p>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.</p>	
6.14	<p>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 <i>"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"</i>. 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</p>	Noted
6.15-6.16	<p>Policy 7.3.2 is concerned with meeting Objective 7.3. Proposal 7.3.2a requires that <i>"Waste authorities, in delivering their waste</i></p>	<p>The Proposed Development is able to meet the CIF without the need for additional processing of waste, as the CIF is calculated to be 400 g CO2/kWh when using GLA's base waste composition, which does not include additional processing.</p>

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	<p><i>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:</i></p> <p><i>"-0.069 tonnes CO2e per tonne of waste managed by 2020/21</i></p> <p><i>-0.084 tonnes CO2e per tonne of waste managed by 2024/25</i></p> <p><i>-0.167 tonnes CO2e per tonne of waste managed by 2030/31".</i></p> <p><i>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.</i></p>	<p>Notwithstanding, it is clear that the Mayor has a raft of policy and strategy in place (not least policy SI7 of the draft London Plan and proposal 7.1.1b and Objective 7.3 of the London Environment Strategy) that is intended to drive down the quantities of plastics present in residual waste streams. As it is generally preferable to remove specific waste streams before they are mixed into residual waste, this is a better approach than advocating that each EfW plant operator must incorporate additional pre-treatment. Assuming that the Mayor's policies achieve the desired reduction in plastic waste, the CIF performance of REP would improve, relative to current analysis, in the future.</p> <p>The Applicant would note that this Policy is directed at "waste collected by waste authorities". The Applicant does not collect waste and is not a waste authority. The duty under this Policy (which of course is not part of the London Plan), is for waste authorities on top of their general duty of care responsibilities in dealing with waste.</p>
6.17-6.18	<p>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</p>	<p>See response to paragraphs 3.10-3.11 in Table 1 above, REP will meet the CIF Target.</p>

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	<p>explains that:</p> <p><i>"...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.</i></p> <p><i>"The Mayor will retain, for waste authorities, a target CIF level of 400 grams of CO2 per kWh of electricity produced from LACW until at least 2025.</i></p> <p><i>"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:</i></p>	

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	<ul style="list-style-type: none"> • <i>reaching high recycling rates, including for plastics, metals and textiles. This reduces the 'carbon intensity' of residual waste going to energy generation</i> • <i>pre-treatment to remove recyclable materials from the residual waste stream</i> • <i>generating energy from 100 per cent organic waste (for example anaerobic digestion of food waste). This is deemed to be carbon neutral</i> • <i>using energy generation facilities generating both heat and power</i> • <i>using waste derived fuels and other low CO2 transport options.</i> • <i>Steps to demonstrate compliance with the CIF should include but are not be limited to:</i> • <i>ongoing reductions in the amount of high carbon materials sent for incineration or gasification that could be recycled</i> • <i>activities resulting in investment in technology or infrastructure improving the overall efficiency of the facility to meet the</i> 	

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	<p><i>CIF.</i></p> <ul style="list-style-type: none"> <i>waste authorities and relevant facility operators actively supporting roll out of existing energy master plans to help connect heat infrastructure to local developments.</i> <p><i>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."</i></p> <p>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.</p>	
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	The Applicant agrees that REP will process residual waste and expects REP to export heat. The Applicant has committed to this ambition by developing the ERF as "CHP-Enabled", meaning it will be fully capable of exporting heat from the commencement of operations, with all required on-site infrastructure consented via

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	<p>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.</p>	<p>the Development Consent Order and which the Applicant is committing to installing (see Requirement 20 of Schedule 2 to the dDCO submitted at Deadline 3) when the necessary details of the heat network it is supplying are known. Furthermore, the Applicant has been actively involved in the establishment of and an ongoing commitment to the Bexley District Heating Partnership Board</p>
6.20	<p>Available evidence 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).</p>	<p>The Applicant is applying for a "CHP-Enabled" generating station, which is a higher state of readiness than "CHP Ready".</p> <p>In addition, the Applicant has submitted a Combined Heat and Power Assessment (5.4, APP-035), which contains a heat demand investigation, an economic assessment, energy efficiency measures, compliance with the EA's CHP-Ready Guidance and conclusions. The Applicant has also submitted a Combined Heat and Power Supplementary Report (5.4.1, REP2-012), which contains a heat export strategy and a further demand analysis as well as a letter from Peabody, who are driving forward the regeneration of Thamesmead, who confirm Cory's commitment to delivering CHP from both RRRF and the proposed REP.</p>
6.21	<p>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).</p>	<p>There is no policy requirement, either in the NPS or in the London Plan, to require energy from waste facilities to include pre-treatment. As stated at the Issue Specific Hearing on Environmental Matters held on 5 June 2019, the Applicant is preparing a note on Duty of Care responsibilities and will submit this into the Examination. The Applicant would also refer to paragraph 6.15 above; as the GLA's LES itself makes clear, there is a duty on the waste authorities who must also place their part.</p>

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		<p>The Applicant has provided a detailed response to the GLA's WR (WR4: Lack of Need for Waste Capacity) in the Applicants Responses to Written Representations (8.02.14).</p>

1.6 Waste

Table 4: Applicants comments on Section 7 – Waste of the GLA's LIR

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Section 7- Waste		
<i>London Plan</i>		
7.2	<p>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 <i>Waste Net</i></p>	<p>The Applicant agrees that the Mayor's policy is to seek net self-sufficiency by 2026 and that achieving the right infrastructure will enable London and Londoners to receive environmental and economic benefits from the sustainable management of waste, wherever its origin. REP provides the necessary infrastructure to deliver this policy.</p>

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	<p><i>Self- Sufficiency</i>, 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.</p>	
7.3	<p>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.</p>	<p>The Applicant agrees that wastes that are currently exported outside of London should be sustainably managed within London to achieve environmental, societal and economic benefits. The PBR (7.2, APP-103) makes clear REP's role in achieving the ambition to maximise management of the capital's waste within its boundaries, delivering a positive carbon outcome and providing a source of heat well located to a substantial regeneration area.</p>
7.4-7.5	<p>With regard to waste capacity, Policy 5.17 <i>Waste Capacity</i> sets out the following criteria with regard to the Mayor's strategic approach and planning decisions for waste processing capacity: "Strategic <i>A The Mayor supports the need to increase waste processing capacity in London. He will work with London boroughs and waste</i></p>	<p>The Applicant welcomes the GLA's comment that the location of the proposed REP meets the criteria for Policy 5.17 with regard to the proposed Anaerobic Digestion facility. However, the Applicant disagrees with GLA that insufficient evidence has been provided that the proposed location is suitable for the proposed ERF.</p> <p>Appendix A of the Statement of Reasons (4.1, REP2-008) sets out a number of reasons relating to the suitability and advantages of the REP site. These include:</p> <ul style="list-style-type: none"> • Optimising existing river transport infrastructure that is already established for

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	<p><i>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.</i></p> <p>Planning Decisions <i>B Proposals for waste management should be evaluated against the following criteria:</i></p> <ul style="list-style-type: none"> <i>a. locational suitability (see LDF preparation paragraphs F and G below)</i> <i>b. proximity to the source of waste</i> <i>c. the nature of activity proposed and its scale</i> <i>d. minimising waste and achieving high reuse and recycling performance</i> <i>e. achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recycles 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 CO₂eq performance of 400 grams of CO₂eq per kilowatt hour (kwh) of electricity produced. Achieving this performance will ensure that energy generated from waste activities is no more</i> 	<p>waste & material delivery and export;</p> <ul style="list-style-type: none"> • Optimising a location that is already in a low carbon/renewable and waste management use (including the ability to share infrastructure with RRRF, thereby reducing the footprint of REP); • Use of a brownfield site that is adequate to accommodate REP; • Proximity to the necessary electrical connection; • Providing good potential for district heating; and • Location is such that there are no significant adverse effects on the sensitive residential and environmental receptors. <p>Expanding upon the bullet points above, the location of REP optimises the use of existing marine freight interchange facilities, as provided for in the operation of RRRF. This optimises the opportunities to transport material by river and minimises the need for further infrastructure within the river. The movement of waste material from the system of waste transfer stations using the same tug and barge combinations currently operated by the Applicant allows for fewer additional movements along the river Thames, minimising the effects on available capacity within the river system. Existing highly qualified crew would be used, maximising the use of these skills and protecting the future for those employed in the Thames lighterage industry.</p> <p>Furthermore, the Combined Heat and Power Supplementary Report (REP2-012) and the Applicant's response to the GLA's WR in the Applicant's Responses to Written Representations (8.02.14) demonstrate that REP is appropriately located</p>

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	<p><i>polluting in carbon terms that the energy source it replaces (see paragraph 5.85 below).</i></p> <p><i>f. the environmental impact on surrounding areas, particularly noise emissions, odour, air quality and visual impact and impact on water resources</i></p> <p><i>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.</i></p> <p><i>The following will be supported:</i></p> <p><i>h. developments that include a range of complementary waste facilities on a single site</i></p> <p><i>i. developments for manufacturing related to recycled waste</i></p> <p><i>j. developments that contribute towards renewable energy generation, in particular the use of technologies that produce a renewable gas</i></p> <p><i>k. developments for producing renewable energy from organic/biomass waste.</i></p> <p><i>C Wherever possible, opportunities should be taken to provide combined heat and power and combined cooling heat and power.</i></p> <p><i>D Developments adjacent to waste management sites should be designed to</i></p>	<p>to deliver CHP and is an efficient facility that will achieve the CIF target.</p> <p>The REP site is also located in a Heat Network Priority Area and the catchment area for heat from REP includes two opportunity areas (Thamesmead and Abbey Wood OA and Bexley Riverside OA).</p> <p>The Applicant is applying for a "CHP-Enabled" generating station, which is a higher state of readiness than "CHP Ready", as all the on-site infrastructure necessary to connect to a heat distribution network is included in the Development Consent Order and the Applicant is committed to delivering it to the REP site boundary.</p> <p>Both the findings of the Ramboll feasibility study, funded through the Mayor's Decentralised Energy Enabling Project (DEEP), and the Applicant's own heat demand analysis Combined Heat and Power Assessment (5.4, APP-035) and Combined Heat and Power Supplementary Report (5.4.1, REP2-012), demonstrate that there is need for REP and the likely developments that would receive the heat supply.</p> <p>As demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the ERF achieves a CIF of 400 grams of CO₂eq per kilowatt hour when operating in power-only mode. This is achieved because the ERF will be the most efficient EfW plant in the UK. It is anticipated that the ERF will also export heat, which will reduce the CIF further.</p> <p>REP is a nationally significant infrastructure project, a strategic facility that is not limited to taking waste from within the London Borough of Bexley, or even within just London. The PBR (7.2, APP-103) makes clear that there is no reasonable objection to bringing wastes to REP from outside of London and London can benefit from the private investment not least through the increase in supply and diversity of energy, through the creation of additional jobs, and through the supply of heat.</p> <p>The London Waste Strategy Assessment (Annex A to the PBR (7.2, APP-103)), demonstrates that in order for the Mayor to achieve his adopted, and draft, plan</p>

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	<p><i>minimise the potential for disturbance and conflicts of use.</i></p> <p><i>E Suitable waste and recycling storage facilities are required in all new developments”.</i></p> <p>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 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.</p>	<p>policies and for London to be self-sufficient, there is demand for REP in excess of its nominal, and indeed theoretical, throughput, not just now but in 2036 as well (see Table 6.1). This need is greater when you add on the need from authorities surrounding London.</p> <p>The Applicant considers that the benefits of the REP site, together with the fact that 85 % of the total of the REP site is in the freehold ownership of the Applicant/Cory Group, makes the REP site the right location for REP. In particular, as per new London Plan Policy, the optimisation of existing infrastructure (river infrastructure and the infrastructure at RRRF), and the proximity to the heat network demand, means that the Applicant has chosen an ideal site for REP in terms of minimising environmental effects. Further information regarding the location of REP is included in Paragraph 5.2.6 of Chapter 5 Alternatives Considered of the ES (6.1, REP2-015).</p> <p>The air quality assessment undertaken in Chapter 7 Air Quality of the ES (6.1, REP2-019) is a cumulative assessment and no significant effects on air quality have been identified.</p>

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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).	The Combined Heat and Power Supplementary Report (5.4.1, REP2-012) and the Applicant's response to the GLA's WR in the Applicant's Responses to Written Representations (8.02.14) demonstrate that REP is appropriately located to deliver CHP.
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).	<p>The Applicant has assessed robustly the effects of moving waste and ancillary materials to and from REP under a range of scenarios as set out at Table 6.6 of Chapter 6 Transport of the ES (6.1, REP2-017). Those scenarios include 100% of waste transported by road (the reasonable worst-case road scenario); 25% of waste transported by road (the nominal road scenario); and 100% of waste transported by river (the reasonable worst case river scenario).</p> <p>The Applicant has made the best assumptions it can at this stage as to the split of waste being delivered to REP from various waste transfer stations. It is this split that has been assessed in the ES. The source locations for the materials have already consented operations and therefore waste deliveries to those source locations are not required to be assessed for the Transport Planning effects within this DCO.</p>
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	The definite origin of waste for disposal at REP cannot be confirmed at this time. REP's location within the capital means that it is likely to receive waste from across London. The majority of residual waste arriving at REP will arrive from one of the Applicant's feeder riparian waste transfer stations. The Applicant operates a network of riparian transfer stations along the River Thames (Smugglers Way-Wandsworth, Cringle Dock – Battersea, Walbrook Wharf- City of London and Northumberland Wharf – Tower Hamlets) – see paragraph 4.1.7 of Appendix K.4 ,

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	<p>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).</p>	<p>Operational Waste Statement of the ES (6.3, APP-097). The Applicant also has permission for an additional waste transfer station facility at the Port of Tilbury adjacent to the Incinerator Bottom Ash (IBA) processing facility. These facilities have the capacity (under existing permits and permissions) to handle the residual waste that would be transported to REP for recovery.</p> <p>The assessment with Chapter 6 Transport of the ES (6.1, REP2-017) and Appendix B.1, the TA to the ES (6.3, APP-066), have taken a series of assumptions about the distribution of road movements which are fed through-out the documentations and reflect the scenario tested to which they relate. These include Plates 6.1 and 6.2 of Chapter 6 Transport of the ES (6.1, REP2-017) which set out the core assumptions for the distribution of waste material sources for the ERF. Plate 6.3 of Chapter 6 Transport of the ES (6.1, REP2-017) sets out the distribution of material for the Anaerobic Digestion plant. Road movements are then distributed across the network reflecting the balance of observed traffic – as established during the data capture exercise which was agreed with TfL during the initial scoping for the DCO.</p> <p>REP would be operated as a commercial entity. It is not feasible to commit to the contracts that would be serviced, and those contracts in time could also change during the life of the facility. The assumptions for source material have been based on the Applicant's existing commercial knowledge and reflecting observed data.</p> <p>Due to the operation of the anticipated contracts, some vehicles will be required to use local roads during roadside collections. Those routes would be varied by the waste contractor and outside the control of the Applicant. The collection route would then influence the routing of that vehicle towards REP. The Applicant would encourage those contractors to use the TLRN and SRN within London as much as appropriate for movements within the London Boroughs. Outside of London, the Applicant could also encourage the use of main and strategic roads where appropriate.</p>

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		<p>No further commitment can be made to vehicle routeing for vehicles outside the control of the Applicant.</p> <p>The Applicant intends to maximise the use of the river and its existing infrastructure and fleet of barges to operate REP. London Plan Policies promote the use of waterways for transporting bulk materials via waterways.</p> <p>The updated draft DCO (dDCO) (3.1, Rev 2, submitted at Deadline 3) includes Requirement 14 in Schedule 2, which restricts the number of two-way vehicle movements made by heavy commercial vehicles delivering waste to the ERF and Anaerobic Digestion facility during the commissioning and operational period, to a maximum of 90 vehicles in and 90 vehicles out per day, save in circumstances where there is a temporary jetty outage.</p>
<i>Draft London Plan</i>		
7.9-7.11	<p>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:</p> <p><i>"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:</i></p> <ul style="list-style-type: none"> <i>• municipal waste – 65 per cent recycling/composting by 2030</i> 	<p>The LWSA (Annex A of the PBR (7.2, APP-103)) submitted by the Applicant assesses the recycling targets set out in both the draft London Plan and the London Environment Strategy and demonstrates that achieving the policy priorities of net-self-sufficiency and 65% recycling requires an additional c. 900,000 tonnes of residual waste treatment capacity (see Table 6.1 of the LWSA, scenarios 2a, 3b, and 4) in London. The LWSA (Annex A of the PBR (7.2, APP-103)) focusses on London and consequently does not include the residual wastes arising beyond London that, as discussed in the Applicant's response to the GLA's WR in the Applicant's Responses to Written Representations (8.02.14), is at least 1.5 million tonnes.</p> <p>The Applicant fundamentally disagrees with the GLA's assertion that no new energy recovery capacity is required and, despite requesting it, has had no sight of the GLA's modelling in order to understand how such an assertion could be made.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>• <i>construction, and demolition and excavation waste – 95 per cent recycling by 2020</i>”.</p> <p>Paragraph 9.7.3A states: <i>“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”</i>.</p> <p>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).</p>	
7.12	<p>Part A of Policy S18 Waste capacity and net waste self-sufficiency sets out how London’s waste should be managed sustainably: <i>“1) the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026</i> <i>2) existing waste management sites should be safeguarded (see Policy S19 Safeguarded waste sites)</i> <i>3) the waste management capacity of existing sites should be optimised</i></p>	<p>The Applicant is pleased to confirm that the Proposed Development accords with policy SI8/A, not least as demonstrated in the PBR (7.2, APP-103) and the Planning Statement (7.1, APP-102). In short, REP will:</p> <ol style="list-style-type: none"> 1) enable London to reach net self-sufficiency by 2026; 2 & 3) safeguard and optimise an existing waste management site; 4) provide a waste management site where it is required, within London and with unique river transport connection and CHP opportunities; and 5) create environmental, social and economic benefits.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>4) <i>new waste management sites should be provided where required</i> 5) <i>environmental, social and economic benefits from waste and secondary materials management should be created</i>".</p>	
7.13	<p>The Mayor accepts that the principle of net self-sufficiency will, in certain circumstances, involve waste being treated in London that originated elsewhere.</p>	<p>The Applicant agrees with the Mayor that the principle of net self-sufficiency involves waste being treated in London that originated elsewhere.</p>
7.14	<p>Policy S18, in part C, goes on to describe development proposals that are particularly encouraged; these are development proposals which: <i>"1) deliver a range of complementary waste management and secondary material processing facilities on a single site</i> <i>2) support prolonged product life and production of secondary materials including repair, refurbishment and remanufacture</i> <i>3) contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste</i> <i>4) provide combined heat and power and/or combined cooling heat and power</i> <i>5) contain proposals to effectively deal with CD&E waste on site and minimise export to landfill</i>".</p>	<p>The Applicant is pleased to confirm that the Proposed Development accords with policy S18/C, not least as demonstrated in the PBR (7.2, APP-103). In short, REP will:</p> <ol style="list-style-type: none"> 1) deliver a range of complementary technologies on site incorporating the Anaerobic Digestion facility, the ERF, solar panel array and battery storage; 2) support prolonged product life through recovering: energy from residual wastes; energy from food and garden wastes; digestate (a recognised soil conditioner); and secondary materials post-combustion so avoiding the use of raw materials; 3 & 4) provide a supply of renewable/low carbon electricity and will be CHP Enabled in a location where there is great potential to connect to a new district heating network; and 5) minimise the export of CD&E waste to landfill.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
7.15	<p>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) "<i>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</i>". A requirement is proposed (see section 9 of this document) to ensure that the biogas produced in the REP is utilised efficiently.</p>	<p>The Applicant agrees with the Mayor that the Anaerobic Digestion facility complies with policy. Work Number 5 in Schedule 1 to the dDCO (3.1, Rev 2, submitted at Deadline 3) includes "<i>infrastructure for the transmission and/or storage of compressed natural gas.</i>" The necessary infrastructure is therefore included in the DCO Application.</p> <p>The Applicant agrees that injection of biogas to the gas grid, or upgrade to vehicle fuel, are the preferred options, as set out in Paragraph 3.3.41 of Chapter 3 Project and Site Description of the ES (6.1, REP2-013). However, the Applicant is aware that there may be obstacles to the preferred option, principally (in the case of injection to grid) whether there is capacity in the local gas network to facilitate biogas injection, engineering of a gas delivery pipeline and securing of relevant (off-site) consents for the installation. In the case of upgrade of biogas to compressed natural gas (CNG) vehicle fuel, there would be a need to establish a market for the sale of vehicle fuel and secure associated licenses, and/or upgrade the waste delivery vehicle fleet to operate on this fuel source, which is outside of the Applicant's control. The Applicant has therefore allowed for an option to utilise biogas to generate electricity using CHP engines, if necessary.</p>
7.16	<p>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</p>	<p>The Applicant does not dispute that only part of the waste stream is renewable, and that is why the Applicant has referred to REP as both low carbon and renewable. Furthermore, this is accepted in policy, as demonstrated in the Applicant's response to the GLA's WR in the Applicant's Responses to Written Representations (8.02.14).</p> <p>However, the Applicant disagrees that it has not provided evidence on this point. The Carbon Assessment (8.02.08, REP2-059) considered four waste compositions, including one following the removal of plastics from the waste stream,</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	representations (WR2 Renewable Energy).	<p>and all four had a biocarbon content of more than 50% (see Table 1 of the Carbon Assessment (8.02.08, REP2-059)). Whilst it is therefore reasonable to conclude that the biocarbon content of REP will be higher than 50% at first operation in 2024 (and thus it is a conservative assumption to assume that the ERF element of REP will be at least 50% renewable), this ultimately does not affect the policy position as set out in the Applicant's Response to the GLA's WR (see the Applicant's Responses to Written Representations (8.02.14)), which is that REP accords with the Energy NPSs.</p> <p>In any event, the UK needs all the types of energy infrastructure covered in EN-1 (which includes Energy from Waste electricity generation) in order to achieve energy security at the same time as reducing (dramatically) greenhouse gas emissions (EN-1, paragraph 3.1.1).</p>
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).	<p>The Applicant is applying for a "CHP-Enabled" generating station, which is a higher state of readiness than "CHP Ready", as previously explained in this response.</p> <p>In addition, the Applicant has submitted a Combined Heat and Power Assessment (5.4, APP-035), which contains a heat demand investigation, an economic assessment, energy efficiency measures, compliance with the EA's CHP-Ready Guidance and conclusions. The Applicant has also submitted a Combined Heat and Power Supplementary Report (5.4.1, REP2-012), which contains a heat export strategy and a further demand analysis as well as a letter from Peabody, who are driving forward the regeneration of Thamesmead, who confirm Cory's commitment to delivering CHP from both RRRF and the proposed REP.</p>
7.18	Part D of Policy SI8 states that development proposals for new waste sites or to increase	The Applicant is pleased to confirm that the Proposed Development is in accordance with Policy SI8 part D. It is demonstrated:

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>the capacity of existing sites should be evaluated against the following criteria:</p> <p><i>"1) the nature of the activity, its scale and location</i></p> <p><i>2) job creation and social value benefits including skills, training and apprenticeship opportunities</i></p> <p><i>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 CO2 equivalent per kilowatt hour of electricity produced</i></p> <p><i>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</i></p> <p><i>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".</i></p>	<p>1) to be of an appropriate activity, scale and location (not least as set out in the PBR (7.2, APP-103), the LWSA (Annex A of the PBR (7.2, APP-103)) and the Supplementary Report to the Project and its Benefits Report (REP2-045);</p> <p>2) to provide job creation and social value benefits as set out in the PBR (7.2, APP-103) and the Planning Statement (7.1, APP-102)</p> <p>3) to achieve a positive carbon outcome, as set out in the PBR (7.2, APP-103), the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045), the Combined Heat and Power Supplementary Report (5.4.1, REP2-012) and the Carbon Assessment (8.02.08, REP2-059);</p> <p>4) to be a fully enclosed facility under one roof (save for the solar PV) so as to avoid any potential environmental effects on sensitive receptors, as set out in the ES.</p> <p>5) to support the use of existing marine waste handling facilities – helping to reduce the movement of waste materials by road within London by heavy commercial vehicles.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
7.19	The above criteria generally reiterate themes already developed in the London Plan and LES.	The Applicant is pleased to confirm that the Proposed Development is in accordance with the themes set out across the development plan and the London Environment Strategy.
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	<p>We are pleased the GLA acknowledges that the job creation proposed by REP is in general conformity with the draft new London plan. The ERF facility within REP is just one element of the infrastructure required within London to meet the challenging policy set within the draft new London Plan and the London Environment Strategy. As acknowledged in the London Environment Strategy, 1.4 million tonnes of new recycling capacity (London Environment Strategy, page 325) will be required to meet the recycling targets set. It is not disputed that this new infrastructure will also create additional jobs. The development of REP will not inhibit the development of this new required recycling infrastructure.</p> <p>London Waste Strategy Assessment (Appendix A to The Project and Its Benefits Report, (7.2, APP-103)) , summarised at Table 6.1 shows that even with this recycling infrastructure in place, and at least c. 900,000 tonnes of new residual waste treatment capacity will be required in London, before the needs of the South East are even considered.</p> <p>The new recovery capacity proposed at REP will complement and work alongside recycling activities in London in line with the waste hierarchy.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
7.21	<p>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.</p>	<p>There is no planning policy requirement for the Applicant to guarantee the London Living Wage in respect of the Proposed Development. In any event, the vast majority of the jobs at the Proposed Development will be highly skilled jobs, at degree or above level.</p> <p>However, the Applicant has agreed to prepare and implement an Employment and Skills Plan to optimising opportunities for local employment, skills and economic development benefits. This will include how the use of the shared site with RRRF which, within operational and safety constraints, could provide beneficial opportunities for training, educational or community purposes. Requirement 18 of Schedule 2 to the dDCP (3.1, Rev 2), submitted at Deadline 3) secures the provision of, and implementation of, an employment and skills plan.</p> <p>The Applicant is progressing the Employment and Skills Plan with the London Borough of Bexley (LBB). An outline draft of the Employment and Skills Plan was submitted to LBB and is currently being reviewed.</p>
7.22	<p>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: <i>"a commitment to source truly residual waste – waste with as little recyclable material as possible.</i> <i>a commitment (via a Section 106 obligation)</i></p>	<p>The Applicant agrees, draft London Plan policy S18/D3 is very specific that achievement of positive carbon outcome will be measured by reference to a minimum performance standard (the CIF) of 400g of CO₂ equivalent per kilowatt hour of electricity produced. As demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the ERF achieves a CIF of 400 grams of CO₂eq per kilowatt hour when operating in power-only mode, as calculated using the GLA's spreadsheet tool provided directly to the Applicant for this purpose and using the GLA's base waste for London. This is achieved because the ERF will be the most efficient EfW plant in the UK. Further, it is anticipated that the ERF will also export heat, which will reduce the CIF further.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>to deliver the necessary means for infrastructure to meet the minimum CO2 standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency.</i></p> <p><i>an agreed timeframe (via a Section 106 agreement) as to when proposed measures will be delivered.</i></p> <p><i>the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority”.</i></p>	<p>Notwithstanding the position that the ERF will meet the CIF of 400, the Applicant has committed to the development of a heat distribution network to the site boundary (as secured through Requirement 20 in Schedule 2 of the dDCO (3.1, Rev 2) submitted at Deadline 3) and has established and is taking an active role in a working group to progress the agreed steps (the Bexley District Heating Partnership Board).Peabody (LBB's development partner for the Thamesmead and Abbey Wood regeneration areas) recognises and welcomes the Applicant's approach, as detailed in its letter of support provided at Appendix A to the Combined Heat and Power Supplementary Report (REP2-012).</p> <p>In terms of the type of waste to be treated at REP. The Anaerobic Digestion facility will receive food and green wastes specifically source segregated by waste producers; it cannot manage any other type of waste and function properly. The London Borough of Bexley already provides a separate kerbside collection service for garden and food wastes (fortnightly and weekly respectively) such that the Anaerobic Digestion facility can provide an in-Borough solution for those source segregated wastes.</p>
7.23	<p>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).</p>	<p>The ERF will be limited, appropriately and effectively, in the type of waste that it can receive by the Environmental Permit, which is regulated by the Environment Agency. As set out in the Environmental Permit and Air Quality Note (8.02.06, REP2-057), an application for the Environmental Permit has been submitted and validated by the Environment Agency. Consultation has been undertaken on that application, and 'no significant concerns' have been raised by any of the statutory consultees (Environmental Permit and Air Quality Note (8.02.06) paragraph 2.5.3).</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>As explained during the ISH, the Environmental Permit explicitly states the specific European Waste Catalogue codes that can be accepted at the ERF and requires that waste shall only be accepted if:</p> <ul style="list-style-type: none"> a. it is of a type and quantity listed in the relevant schedule (Schedule 2, Table S2.2; and it conforms to the description in the documentation supplied by the producer or holder; and b. if having been separately collected for recycling, it is subsequently unsuitable for recovery by recycling. <p>The ERF will only be able to accept residual waste by virtue of its Environmental Permit. In operation, the ERF will only receive wastes from waste collectors/handlers that are known to the Applicant. These waste collectors/handlers are required, both by legislation and by the Applicant's own duty of care, to comply with the waste hierarchy and deliver residual wastes. When the residual waste is received at the ERF, the Applicant has a duty of care to manage it appropriately. This is done through: appropriate contracts with those who are delivering the waste; and through on-site spot-checks to ensure that only waste that complies with the Environmental Permit is received.</p> <p>It is important to remember that REP is just one element of the network of infrastructure required within London to ensure the capital's waste is managed sustainably and in line with the waste hierarchy. Waste producers, collectors and handlers all have a role to play (as indeed is recognised by the LES and referenced at paragraph 6.15 of the GLA's LIR), with REP receiving those wastes for which it is permitted. The Applicant would be subject to a range of sanctions from the Environment Agency, including suspension of the Environmental Permit, if the ERF is not operated in accordance with the Environmental Permit. Correctly implementing its duty of care in relation to the waste hierarchy is a key element of this.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
<i>London Environment Strategy (LES)</i>		
7.25	<p>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:</p> <p><i>“reducing waste and the use of single use packaging, so that fewer disposable products are created in the first place</i></p> <p><i>ensuring valuable resources are kept in use for as long as possible</i></p> <p><i>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</i></p> <p><i>making the most of materials that can no longer be reused or recycled, by using them to generate low carbon energy”</i></p> <p><i>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”.</i></p>	<p>The Applicant supports the Mayor's approach to delivering a circular economy and is pleased to confirm that REP will make a positive contribution to achieving this aim, not least as set out in the PBR (7.2, APP-103) and the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045).</p> <p>However, it disagrees that the Mayor's approach will negate the need for new incineration facilities in London. Using London Plan data and London Environment Strategy policies, the LWSA (Annex A to the PBR (7.2, APP-103)) demonstrates that there remains a need for c.900,000 tonnes of new capacity in London.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
7.26	<p>The following objectives and policies are considered directly relevant to the proposed development:</p> <p>Objective 7.2 <i>Maximise Recycling Rates</i>: “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.</p> <p>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:</p> <p><i>all new cars and vans (less than 3.5 tonnes) being zero emission capable from 2025</i></p> <p><i>all heavy vehicles (greater than 3.5 tonnes) being fossil fuel-free from 2030</i></p>	<p>The Applicant is pleased to confirm that it has considered the need for future residual waste treatment capacity using the aspirational recycling targets set in the London Environment Strategy and demonstrates that there remains a need for REP.</p> <p>In line with Objective 7.2, the LWSA (Annex A of the PBR, (7.2, APP-103)) demonstrates that achieving the policy priorities of net-self-sufficiency and 65% recycling requires an additional c. 900,000 tonnes of residual waste treatment capacity (Table 6.1, scenarios 2a, 3b, and 4) in London. This is before considering any of the residual wastes arising beyond London, comprising at least 1.5 million tonnes (see from Section 2.1 of Applicant's Responses to Written Representations (8.02.14) to the GLA WR.</p> <p>In line with Proposal 7.3.1.a, the Applicant can confirm that road vehicles delivering material to REP will accord with the emissions zone in which they are operating which in time will meet the policy position for the Ultra-low Emission Zone for London (ULEZ). The Applicant will not control all the vehicle fleet delivering waste material to REP. Where those vehicles are on contracts for municipal waste collection from inner London Boroughs, most will be set by the local waste authorities (and it is noted that the policy is directed at waste authorities) and would typically include high vehicle standards with the policy to achieve zero emissions by 2050. REP is not to be located within the proposed extension to the London ULEZ (as of October 2021).</p> <p>Furthermore, as demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the ERF achieves a CIF of 400 grams of CO₂eq per kilowatt hour when operating in power-only mode, as calculated using the GLA's spreadsheet tool provided directly to the Applicant for this purpose and using the GLA's base waste for London. This is achieved because the ERF will be the most efficient EfW plant in the UK. It is anticipated that the ERF will also export heat, which will reduce the CIF further.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>zero emission fleets by 2050</i></p> <p><i>Fossil-fuel free can include the use of 100 per cent renewable fuels derived from sources such as food waste and waste oils”.</i></p> <p><i>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”</i></p>	<p>Even if the ERF did not meet the current target, demonstrable steps have been put in place to export heat and thus reduce the CIF, as demonstrated in the Combined Heat and Power Supplementary Report (5.4.1, REP2-012).</p> <p>The Applicant fundamentally disagrees with the GLA’s assertion that no new energy recovery capacity is required and, despite requesting it, has had no sight of the GLA’s modelling in order to understand how such an assertion could be made.</p>
7.27	<p>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.</p>	<p>The Applicant agrees with the Mayor’s definition of municipal waste.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
7.28	<p>The GLA confirms that the proposed Anaerobic Digestion facility conforms with the LES in supporting achievement of the CIF. However, available evidence 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).</p>	<p>REP would meet the CIF target. As set out in Section 4.2 of the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the Applicant has assessed the carbon impact of the Proposed Development in accordance with GLA approved methodology. The Applicant has, at the GLA's request, tested the proposals using both published and unpublished Ready Reckoners, with the most recent being a version provided by the GLA in April 2019. REP will comply with the requirements of the CIF in all load cases and using any of the ready reckoner versions issued.</p> <p>Regarding types of waste, refer to paragraph 7.23 above.</p>
7.29	<p>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</p>	<p>In its comment, the GLA reasserts the extent of the challenge that is faced to meet a recycling target of 65% across all municipal waste, including reference to the recycling capacity gap of 1.4 million tonnes. Figure 6.9 of the LES Evidence Base (Appendix 2 to the LES) shows that even with service improvements across London, there remains a 7.8% gap in achieving 50% household waste recycling.</p> <p>The Applicant has embraced the recycling targets set out in the London Plan and LES in considering the Proposed Development. REP will make a positive contribution both to Objective 7.4 (through the Anaerobic Digestion facility) and to the circular economy through the recovery of energy and materials. Even achieving the Mayor's recycling targets, the Applicant has demonstrated there remains a need for new residual waste treatment capacity in London.</p> <p>If those recycling targets are not met, and there is no capacity provided from projects such as REP, waste will have to be sent to landfill, overseas or to other</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	<p>facilities with higher carbon emissions. REP is designed to work with the Mayor's recycling aspirations rather than against them, and also to satisfy the Mayor's policy of net self-sufficiency.</p> <p>The Applicant supports the Mayor in the objectives to increase recycling within London. REP will make a positive contribution both to this objective (through the Anaerobic Digestion facility) and to the circular economy through the recovery of energy and materials.</p>
7.30	<p>The LES states: "Achieving the Mayor's reduction and recycling targets will mean that no new energy from <i>waste facilities in London will be needed, with an expected 153,000 tonnes surplus EFW capacity by 2030</i>". 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.</p>	<p>The LWSA (Annex A of the PBR, (7.2, APP-103)) demonstrates that achieving the policy priorities of net-self-sufficiency and 65% recycling requires an additional c. 900,000 tonnes of residual waste treatment capacity (Table 6.1, scenarios 2a, 3b, and 4). This is before considering any of the residual wastes arising beyond London, comprising at least 1.5 million tonnes (see from Paragraph 1.1.138 of Applicant's Responses to Written Representations (8.02.14)).</p> <p>The Applicant fundamentally disagrees with the GLA's assertion that no new energy recovery capacity is required and, despite requesting it, has had no sight of any of the GLA's modelling in order to understand how such an assertion could be made.</p> <p>In any event, the Mayor's continued reliance on capacity operating outside of London will mean that the policy priority to achieved net self-sufficiency by 2026 is being disadvantaged.</p>

1.7 Transport

Table 5: Applicants comments on Section 8 – Transport of the GLA's LIR

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Transport		
<i>London Plan</i>		
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.	<p>The operation of REP would be wholly in accordance with Policy 6.14 of the London Plan – operating as a riparian facility receiving material from other riparian wharves on the Thames. This would continue to facilitate the movement of freight away from London's roads to optimise the use of existing marine operations and lighterage, as is fully supported by the PLA.</p> <p>The updated draft DCO (dDCO (3.1, Rev 2), submitted at Deadline 3) includes Requirement 14 in Schedule 2, which restricts the number of two-way vehicle movements made by heavy commercial vehicles delivering waste to the ERF and Anaerobic Digestion facility during the commissioning and operational periods, to a maximum of 90 vehicles in and 90 vehicles out per day, save in circumstances where there is a jetty outage. This Requirement will mean that waste will predominantly be transported to the ERF via river in line with the Applicant's expectations.</p> <p>Requirement 14 of the dDCO (3.1, Rev 2), submitted at Deadline 3) also provides a commitment that: 'save where there is a jetty outage, incinerator bottom ash must only be removed via river.'</p>
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	The updated dDCO (3.1, Rev 2) , submitted at Deadline 3) includes Requirement 14 in Schedule 2, which restricts the number of two-way vehicle movements made by heavy commercial vehicles delivering waste to the ERF and Anaerobic Digester during the commissioning and operational periods, to a maximum of 90 vehicles in and 90

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	<p>vehicles out per day, save in circumstances where there is a jetty outage. This Requirement will mean that waste will predominantly be transported via river in line with the Applicant's expectations. The DCO therefore does set a maximum number of heavy commercial vehicle movements.</p>
<p>8.3</p>	<p>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.</p>	<p>The updated draft DCO (dDCO) (3.1, Rev 2), submitted at Deadline 3) includes Requirement 14 in Schedule 2, which restricts the number of two-way vehicle movements made by heavy commercial vehicles delivering waste to the ERF and Anaerobic Digestion facility during the commissioning and operational periods, to a maximum of 90 vehicles in and 90 vehicles out per day, save in circumstances where there is a jetty outage. This Requirement will mean that waste will predominantly be transported via river in line with the Applicant's expectations.</p> <p>Requirement 14 of the dDCO (3.1, Rev 2), submitted at Deadline 3) also provides a commitment that: 'save where there is a jetty outage, incinerator bottom ash must only be removed via river.'</p> <p>The 100% by road scenario (reasonable worst case scenario) has been included in Chapter 6 Transport of the ES (6.1, Rev 1, REP2-017) and Appendix B.1, the TA to the ES (6.3, APP-066) to assess the likely effects on the transport network of a jetty outage scenario. It is not proposed that REP would operate under that scenario under normal conditions. Supplementary assessment of both REP and RRRF operating in a jetty outage scenario is included at Deadline 3 (8.02.31 Temporary Jetty Outage Review (Simultaneous</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		Operations - Riverside Resource Recovery Facility and Riverside Energy Park).
<i>Draft London Plan</i>		
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.	The river based transport focus for operation of REP aligns with the policy position set out by the GLA by focusing movement of freight on the river Thames, significantly reducing the number of heavy commercial vehicles on London’s Road. The implementation of an Operational Worker Travel Plan, secured through Requirement 15 of the dDCO (3.1, Rev 2, submitted at Deadline 3) further adds to the Healthy Streets agenda by encouraging workers to commute by non-car based modes, including walking, cycling and public transport.
8.5	The concerns with regard to compliance with these policies are set out in the GLA’s written representations (WR5: Waste Transfer Impacts).	Noted. The Applicant has provided a detailed response to the GLA’s WR (see the Applicant’s Responses to Written Representations (8.02.14)).
8.6	Draft London Plan Policy T4 – ‘Assessing and mitigating transport impacts’ paragraph B states: <i>“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.”</i>	Appendix B.1 of the ES forms the Transport Assessment for the proposal (6.3, APP-066). This accompanies Chapter 6 Transport of the ES (6.1, Rev 1, REP2-017) .

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
8.7	<p>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).</p>	<p>Supplementary evidence and information associated with the Transport Planning appraisal of the effects during the construction of REP and the associated Electrical Connection have been submitted at Deadline 2 within the Applicant's Response to Relevant Representations (8.02.03, REP2-054) in response to TfL's Relevant Representation (see RR-087). That evidence and information is provided at Appendices F and G of the document. The Applicant understands from TfL that following a meeting on 31 May 2019, at which the supplementary evidence was discussed, TfL requires no further modelling assessment of the construction effects. The Applicant will seek to reflect this conclusion in a SoCG with TfL. The Applicant will continue to engage with TfL in the development of the final CTMP, which will be approved by the relevant planning authority in consultation with TfL, for roads within Bexley, and will be secured through Requirement 13 of the dDCO (3.1, Rev 2, submitted at Deadline 3).</p> <p>The Applicant has responded to the GLA's comments on this matter at sections WR7: A. Construction Traffic Impacts and B. Electrical Connection Impact of the GLA Written Representation submitted at Deadline 2. The responses are provided within the Applicant's Responses to Written Representations (8.02.14) submitted at Deadline 3) at paragraph 1.1.202 to 1.1.245.</p> <p>The Applicant's transport advisor concludes that sufficient and appropriate evidence has been provided to demonstrate that the residual effects on the road network would be no greater than Minor Adverse and would be Not Significant.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
8.8	Policy T7 – ‘Deliveries, servicing and construction’ of the Draft London Plan paragraph F states that <i>“development proposals should facilitate sustainable deliveries and servicing, including through the provision of adequate space for servicing, storage and deliveries off-street.”</i>	The Illustrative Site Layout Plan (2.4, APP-010) indicates the areas within the site which would be set aside for set-down and management of materials, plant and machinery and circulation for vehicles and people. All areas are configured to operate remotely from the Public Highway. The site layout conforms to Draft London Plan Policy T7.
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).	The Applicant commits, through Requirement 14 of the dDCO (3.1, Rev2 , Submitted at Deadline 3), to a cap on the movement of waste material by road. This Requirement will mean that waste will predominantly be transported to the ERF via river in line with the Applicant's expectations. The Applicant would capitalise on the use of the existing wharf at RRRF and co-ordinate fully with the operations at RRRF to optimise the efficiency of the tug and barge fleet and improvements to tugs, as identified at paragraph 7.11.2 of Chapter 7 Air Quality of the ES (6.1, REP2-020) . The proposals are therefore fully compliant with Draft London Plan Policy T7.
8.10	Policy T7 of the Draft London Plan policy paragraph I further states that: <i>“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.”</i>	The site layout will be able to accept vehicles which meet the Direct Vision safety standard aspirations for commercial vehicles within London – this will include low entry cab vehicles in class N3 and N3G format.
8.11	The Draft London Plan focusses on sustainable deliveries and servicing, both during the	The final CTMP/CTMPs will consider the management of construction vehicle movements during the construction of REP and

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	<p>operational phase of a development and during construction. Paragraph 10.7.1 states: <i>“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.”</i></p>	<p>the Electrical Connection. That process will include the possibility of timing of deliveries and exports with the possibility of avoiding network peak periods. Those consideration would similarly need to consider the effects on the wider journeys such that greater challenges are not created at the other end of that vehicles journey (e.g. compliance with the London Lorry Control Scheme; disposal site operating hours; and batching plant manufacturing times). Opportunities for consolidation will be reviewed. These could be implemented where appropriate increased in vehicle efficiencies and better movement of plant and materials would be achieved.</p> <p>The final CTMP is secured through Requirement 13 of the dDCO (3.1, Rev 2), submitted at Deadline 3) and would be approved by the relevant planning authority, in consultation with TfL for roads within Bexley.</p> <p>During standard operations at REP a flat profile of materials deliveries by road has been assumed for ERF and AD material. This reflects the need for a consistent supply of material and the form of deliveries, often from roadside collections. Those routes are often affected by controls on their timings and are influenced by the capacities within the vehicles. For the delivery of other ancillary materials and the export of residual materials, the Applicant will seek to avoid movements during the network and REP peak periods.</p>
8.12	<p>In addition, paragraph 10.7.4 of the Draft London Plan states; <i>“When planning freight movements, development proposals should demonstrate through Construction Logistics Plans and Delivery and Servicing Plans that all reasonable</i></p>	<p>Requirement 13 of the dDCO (3.1, Rev 2), submitted at Deadline 3) secures the provision of a final CTMP/CTMPs which will be in accordance with the Outline CTMP (6.3, Rev 2) or a consented amendment thereof.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>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."</i></p>	<p>The Applicant has shown through the assessment at Chapter 6 Transport of the ES (6.1, REP2-017) and Appendix B.1, the TA to the ES (6.3, APP-066) that there would be no residual major adverse impacts associated with the operation of REP. The Applicant therefore does not propose to prepare a Delivery and Servicing Plan for REP.</p>
8.13	<p>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)</p>	<p>The Applicant proposes Requirement 14 of the dDCO (3.1, Rev 2, submitted at Deadline 3) which restricts the number of two-way vehicle movements made by heavy commercial vehicles delivering waste to the ERF and Anaerobic Digestion facility during the commissioning and operational periods, to a maximum of 90 vehicles in and 90 vehicles out per day, save in circumstances where there is a jetty outage. The Requirement reflects the assessment evidence provided within Chapter 6 Transport of the ES (6.1, REP2-017) and Appendix B.1, the TA, to the ES (6.3, APP-066) which have shown that there would be no residual major adverse effects on the road network under the operation of the 100% by road reasonable worst case scenario or the 25% by road nominal scenario. The allocation for transporting a minor proportion of waste by road allows for some waste to be brought to REP from locations which are not suitably served by wharves or riparian WTSs. This could include locally generated waste, which otherwise might have to be transported over a longer distance, perhaps elsewhere into London.</p>
<p><i>London Environment Strategy (LES)</i></p>		
8.14	<p>A key aim of the LES is "for London to be a zero carbon city by 2050, with energy efficient buildings,</p>	<p>Road vehicles delivering material to REP within the Applicant's fleet will accord with the emissions zone in which they are operating which</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>clean transport and clean energy</i>". This includes London's entire transport system (including private vehicles) to be zero emission by 2050.</p>	<p>in time will meet the policy position for the Ultra-low Emission Zone for London (ULEZ). The Applicant will not control all the vehicle fleet delivering waste material to REP. Where those are on contracts for municipal waste collection from inner London Boroughs, most will be set by the local waste authorities and would typically include high vehicle standards with the policy to achieve zero emissions by 2050.</p>
8.15	<p>Proposal 4.2.1.d states "<i>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</i>". Proposal 4.2.1.e refers specifically to freight: "<i>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</i>".</p>	<p>The use of the river Thames to move waste material to REP will assist in reducing emissions in London from road based freight movements. Where practicable and through the standard renewal of its fleet, the Applicant will consider opportunities to introduce alternative fuel and new technology vehicles which will assist with meeting the policy for zero emissions by 2050.</p>
8.16	<p>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.</p>	<p>The contractors employed to construct REP and the associated Electrical Connection will use Non-Road Mobile Machinery (NRMM). Paragraph 4.3.2 of the Outline Code of Construction Practice (7.5, Rev 2) states that "<i>Good site management (e.g. adherence to guidance such as the London Mayor's SPG on The Control of Dust Emissions During Construction and Demolition, 2014) during the construction works will help prevent the generation of airborne dust.</i>"</p> <p>As the final form Code of Construction Practice must be substantially in accordance with the outline, adherence to the non-road mobile machinery ultra low emissions zone is already adequately secured through Requirement 11. Therefore, no change required.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
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.	The Applicant notes and supports the requirement for Local Waste Authorities to achieve low or zero carbon emission fleets 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.	<p>The Applicant does not own or operate the road vehicles that would bring the waste to the ERF and AD plants and therefore will have no influence over them. The correct target for this requirement would be the waste suppliers, which would include the local authorities. In any event, the Applicant is not aware of any London Plan policy that requires a development that would have deliveries to ensure that those delivers are in zero carbon vehicles.</p> <p>The export of ash will be by barge only, as per Requirement 14 of the dDCO (3.1, Rev 2)</p>

1.8 Air Quality

Table 6: Applicants comments on Section 9 – Air Quality of the GLA's LIR

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Section 9 - Air Quality		
<i>London Plan</i>		
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.	Noted.
9.3	Policy 5.7 Renewable Energy seeks to increase the proportion of energy generated from renewable sources but states (in part D) that " <i>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</i> ".	REP has been designed to minimise potential adverse impacts on biodiversity and the natural environment and no significant impacts on air quality have been identified.
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: <i>"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</i>	a. The reference to exposure to existing poor air quality is primarily related to development proposals that introduce new vulnerable receptors into existing areas of poor air quality (which the Proposed Development does not). In terms of the Proposed Development's contribution to increasing exposure to pollution; the ES demonstrates that there are no significant effects on air quality. b. The requirements to control dust and emissions from

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p><i>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)</i></p> <p><i>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'</i></p> <p><i>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)).</i></p> <p><i>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</i></p> <p><i>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</i></p>	<p>demolition and construction is covered in Requirement 11 of the dDCO (3.1, Rev 2, The Applicant has responded to the GLA's comments on this matter at sections WR7: A. Construction Traffic Impacts and B. Electrical Connection Impact of the GLA Written Representation submitted at Deadline 2. The responses are provided within the Applicant's Responses to Written Representations (8.02.14) submitted at Deadline 3) at Paragraph 1.1.202 to 1.1.245</p> <p>c. Air quality neutral standards are defined in terms of different types of residential and commercial developments in London, but there are applicable benchmarks for an industrial facility such as REP. The ES has demonstrated that there are no exceedances of National Air Quality Strategy Objectives in the AQMAs in the vicinity of the site.</p> <p>d. Emissions from REP will be controlled by the Environmental Permit and abatement is provided on-site.</p> <p>e. No biomass boiler is included in the development.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<i>no adverse air quality impacts from the biomass boiler are identified</i> ".	
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.	Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives in any of the AQMAs in the vicinity of the site.
9.6	As well the as London Plan policies above the National Planning Policy Framework affords considerable weight to AQMAs, stating at paragraph 181: <i>"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"</i>	Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives in any of the AQMAs in the vicinity of the site. The development is therefore consistent with the requirements of local air quality action plans. There are no predicted exceedances of limit values for pollutant.
<i>Draft London Plan</i>		
9.7	Air quality is fundamental to the draft London Plan's ambition for 'Good Growth' and healthy living and is a	Noted

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	recurring theme in respect of individual area-based policies.	
9.8	Part DB of Policy GG3 Creating a Health City states that <i>“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</i>	Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives in any of the AQMAs in the vicinity of the site and there is no significant effect on local air quality.
9.9	Chapter 9 deals with sustainable infrastructure. Policy SI1 Improving Air Quality states that: <i>“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 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”</i>	As demonstrated in Chapter 7, Air Quality of the ES (6.1, REP2-019) , the development does not have a significant effect on local air quality and therefore does not lead to a further deterioration of existing poor air quality. Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives in any of the AQMAs in the vicinity of the site and there is no significant effect on local air quality. As the Proposed Development does have a significant effect on local air quality it will not reduce air quality benefits that result from the Mayor’s or boroughs’ activities to improve air quality, nor will it create unacceptable risk of high levels of exposure to poor air quality.
9.10	Paragraph 9.1.1 states that <i>“the Mayor is committed to making air quality in London the best of any major world city, which means not only meeting and</i>	Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives or legal limits for NO ₂ . Emissions

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<i>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”.</i>	from the development will lead to imperceptible changes in particulate matter (PM ₁₀ and PM _{2.5}) concentrations.
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.	The assessment of the impacts of the Proposed Development has considered both fixed and transport related sources and all relevant pollutants.
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.	Noted.
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	We have provided a response to the GLA's Written Representations (WR6 Air Quality Impacts, Paragraph 1.1.188 of the Applicant's Responses to Written Representations

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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).</p>	<p>(8.02.14) and consider that the chosen receptor locations are representative of worst-case receptor locations along the A206 and that there are no significant impacts of road traffic emissions from REP. Furthermore, since the assessment was undertaken, a cap has been imposed on the number of HCV movements associated with waste delivery. This has the effect of reducing the daily HCV movements two way from 686 to 102. The assessment undertaken in the ES is therefore very much worst-case and there are no significant effects demonstrated in the ES.</p> <p>Furthermore, the Applicant disputes that it should assess how waste is transferred to consented waste transfer stations. Rather the correct approach, and that adopted in the scope of the Transport Assessment is set out in Table 6.6 of Chapter 6 Transport of the ES (6.1, REP2-017), is for the Applicant to assess transport movements from the likely sources of waste to REP. That is exactly what the Applicant has done. In the 100% by road scenario, the Applicant makes reasonable worst-case assumptions and considers the transfer of waste to the REP site from the riparian Waste Transfer Stations at Smugglers Way, Cringle Dock, Walbrook Wharf, Northumberland Wharf and the Port of Tilbury. A 100% by river scenario has also been assessed. No significant effects were identified.</p> <p>The riparian Waste Transfer Stations listed above have existing planning and Environmental Permit consents, with sufficient capacity to accept the waste required by REP. These consents have in turn already considered the environmental and traffic impacts associated with the delivery of waste material to these facilities. In a world without REP, there is nothing stopping these</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>Waste Transfer Stations from filling that spare capacity and sending it to another facility. The waste is already travelling to these facilities. It is therefore not appropriate or necessary for the Applicant to assess waste travelling from its source to the Waste Transfer Station. Instead, the Applicant's duty under the Environmental Impact Assessment Regulations is to make likely assumptions on how the waste is to travel to the REP site, as the Applicant has done.</p>
<p>9.14</p>	<p>Policy SD1 <i>Opportunity Areas</i> states that: "A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will: 6) <i>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</i>".</p>	<p>Noted.</p>
<p>9.15</p>	<p>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).</p>	<p>We have provided a response to the GLA's Written Representations (WR6 Air Quality Impacts, Paragraph 1.1.180-1.1.201 of the Applicant's Responses to Written Representations (8.02.14)). Whilst the impact of emissions from the stack will increase with height, the baseline concentrations also reduce as one moves away from ground level pollution sources such as roads. For those existing receptors that have been modelled at elevations above ground level, the reduction in baseline NO₂ concentrations outweighs the increase in NO₂ concentrations at higher elevations due to emissions from the ERF. The Applicant therefore considers that the Proposed</p>

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		Development complies with Policy SD1 of the draft London Plan.
<i>London Environment Strategy</i>		
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.	Noted.
9.17	<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that:</p> <ul style="list-style-type: none"> • there will be no exceedances of air quality standards in the vicinity of the REP site and therefore the air quality standards are achieved; • the assessment has considered the exposure to pollutants of relevant receptors, and • meeting the standards is likely given the realistic worst case nature of the assessment. <p>The Proposed Development is therefore consistent with the Mayor's targets.</p>
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 (NO2). The LES states that London is failing to meet the legal limit for NO2. Particulate matter is damaging to health at any level	<p>Chapter 7, Air Quality of the ES (6.1, REP2-019) has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives or legal limits for NO₂. Emissions from the development will lead to imperceptible changes in particulate matter (PM₁₀ and PM_{2.5}) concentrations.</p>

LIR Summary Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>and must be reduced. The LES states (page 41): “Improving London’s air quality requires the following actions: <i>reducing exposure of Londoners to harmful pollution across London – especially at priority locations like schools – and tackling health inequality</i></p> <p><i>achieving legal compliance with UK and EU limits as soon as possible, including by mobilising action from the London boroughs, government and other partners</i></p> <p><i>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”.</i></p>	
9.19	<p>The LES notes that improving air quality also offers an opportunity to also address climate change. It states: <i>“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”.</i></p>	<p>There is no conflict between CO2 and pollution targets from the Proposed Development. The Proposed Development is a low carbon development and the ES has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives or legal limits for NO₂. Emissions from the Proposed Development will lead to imperceptible changes in particulate matter (PM₁₀ and PM_{2.5}) concentrations.</p>

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9.20	<p>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.</p>	<p>The end-use of the site is not one that is susceptible to poor air quality and therefore the development is consistent with proposed policy 4.1.1c.</p>
9.21	<p>Proposal 4.2.3.e states that the "<i>London Plan includes policies to reduce the impact of new industrial and waste sites on local air quality</i>". Under this Proposal, it is also stated that "<i>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</i>".</p>	<p>The LWSA (Annex A of the PBR, (7.2, APP-103)) demonstrates that achieving the policy priority of 65% recycling requires an additional c. 900,000 tonnes of residual waste treatment capacity (Table 6.1, scenarios 2a, 3b, and 4). This is before considering any of the residual wastes arising beyond London, comprising at least 1.5 million tonnes (see from Paragraph 1.1.123 of the Applicant's Responses to Written Representations to GLA WR (8.02.14)). It is noted that the policy is dependent on "if" the Mayor's municipal waste recycling target is achieved, which gives rise to the risk of the target not being achieved and the likelihood of a capacity gap and therefore higher carbon emissions. In any event, the Applicant's evidence clearly demonstrates a need even if the target is achieved.</p>
9.22	<p>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 PM2.5, as set out in Objective 4.3.</p>	<p>The ES has demonstrated that there will be no exceedances of National Air Quality Strategy Objectives or legal limits for NO₂. Emissions from the development will lead to imperceptible changes in particulate matter (PM₁₀ and PM_{2.5}) concentrations.</p>

1.9 DCO Requirements

Table 7: Applicants comments on Section 10 – DCO Requirements of the GLA's LIR

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
Section 10 – DCO 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.	The Applicant has provided comments on the GLA's and TfL's suggestions. The Applicant does not accept that development consent should only be granted on the terms set out by the GLA and TfL.
<i>The Applicant's proposed draft requirements</i>		
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.	<ol style="list-style-type: none"> 1) The GLA and TfL comments relate to dDCO (3.1 Rev 2). The Applicant has since submitted a revised dDCO at Deadline 2 (3.1, REP2-006) and Deadline 3 (3.1, Rev 2 submitted for Deadline 3). 2) Requirement 13 has remained as requirement 13 in both Rev 1 (submitted at Deadline 2) and Rev 2 (submitted at Deadline 3) of the draft Development Consent Order. 3) Requirement 1 has become Requirement 15 in both Rev 1 (submitted at Deadline 2) and Rev 2 (submitted at Deadline 3) of the draft Development Consent Order. Requirement 17 is Requirement 20 in both Rev 1 (submitted at Deadline 2) and Rev 2 (submitted at Deadline 3) of the draft Development Consent Order. 4) The Applicant would note that the GLA and TfL also provide

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		comments on Requirement 11.
<i>Requirement 11 of the dDCO</i>		
10.4	The GLA and TfL consider that Requirement 11 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.	<ol style="list-style-type: none"> 1) Paragraph 4.3.2 of the draft Code of Construction Practice (7.5, REP2-046) states that "<i>Good site management (e.g. adherence to guidance such as the London Mayor's SPG on The Control of Dust Emissions During Construction and Demolition, 2014) during the construction works will help to prevent the generation of airborne dust.</i>" 2) As the final form Code of Construction Practice must be substantially in accordance with the outline, adherence to the non-road mobile machinery ultra low emissions zone is already adequately secured through Requirement 11. Therefore, no change required.
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"	See response to paragraph 10.4.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
<i>Requirement 13 of the dDCO</i>		
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.	See response to paragraphs 10.8 and 10.9 below.
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	The CTMP is to be submitted to the relevant planning authority for approval, who must consult with the highway authority and, for roads within the London Borough of Bexley, TfL. The Applicant understands from the DCO Hearing held on 6 June 2019, that this is agreed. The drafting of Requirement 13 has been made clearer in the dDCO (3.1, Rev 2 , submitted at Deadline 3).
10.9	TfL would request that the wording of Requirement 13 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.	<p>1) The Applicant understands that TfL has agreed that no further modelling work is required to assess the construction traffic impacts on the highway network. Accordingly, the necessary assessment work to understand the likely impacts on the network has been provided in the Environmental Statement and in the Technical notes submitted at Deadline 2 (Appendices G and F of the Applicant's Responses to Relevant Representations (REP2-054)). No amendment required to Requirement 13.</p> <p>2) Regarding mitigating to the satisfaction of TfL and the relevant</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>planning authority, the final CTMP will need to be approved by the relevant planning authority in consultation with TfL (for roads within the London Borough of Bexley). Therefore, if the relevant planning authority is not content with the final CTMP (or is advised as such by TfL), then the relevant planning authority can refuse the final CTMP. The drafting of Requirement 13 has been made clearer in the dDCO (3.1, Rev 2, submitted at Deadline 3).</p>
	<p>TfL would require a commitment that the construction works will not have a detrimental impact upon the SRN.</p>	<ol style="list-style-type: none"> 1) The Environmental Statement and the Technical notes submitted at Deadline 2 (Appendices G and F of the Applicant's Responses to Relevant Representations (8.02.03, REP2-054)), set out the conclusions of the Applicant's expert technical team. The construction of REP itself is predicted to have a negligible effect on the SRN. 2) The construction of the Electrical Connection is predicted to have, at most, a minor adverse effect on the SRN. 3) These conclusions have informed the outline CTMP, which is the mechanism to ensure, as far as is practicable, that the effects are as assessed in the Environmental Statement. 4) A requirement that refers to "no detrimental impact" is not necessary, enforceable, precise and not reasonable in all other respects as any negative effect, including a minor adverse effect, could be classed as "detrimental". This suggested requirement not only falls fowl of the guidance on the Use of Planning Conditions but is not required given the CTMP.
<p><i>Requirement 14 of the dDCO [now Requirement 15)</i></p>		

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
10.11	TfL would expect that the operational worker travel plans are approved by the relevant planning authority in consultation with Transport for London.	The Applicant agrees with this suggestion and the amendment has been made in Rev 2 of the draft DCO (3.1, Rev 2) , submitted at Deadline 3).
10.12	TfL consider that the wording of Requirement 14 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.	Sustainable mode share targets and the management, monitoring and review of such targets are set out in the Outline Operational Worker Travel Plan contained in Appendix M to Appendix B.1 of the ES (6.3, APP-066) . Section 7.4 of the Outline Operational Worker Travel Plan sets out the commitment to undertake regular update travel surveys and to share that information with LBB, who are tasked with monitoring local Travel Plans within their Borough. LBB would be able to share that information with TfL. At paragraph 7.6.3 of the Outline Operational Worker Travel Plan the Applicant commits to work with LBB to seek suitable remedial action where identified targets have not been achieved. No amendment is required to Requirement 15.
<i>Requirement 17 of the dDCO [now Requirement 20]</i>		
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 the LIR, 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.	<ol style="list-style-type: none"> 1) Requirement 20 is not inadequate – rather it satisfies the relevant National Policy Statement (EN-1) requirements. 2) The primary policy against which the Proposed Development must be assessed, is the National Policy Statements EN-1 and EN-3. The Applicant has fully complied with the NPSs (e.g. section 4.6 of EN-1), through: <ul style="list-style-type: none"> • its Combined Heat and Power Assessment (5.4, APP-035), which contains a heat demand investigation, an economic assessment, energy efficiency measures, compliance with the EA's CHP-Ready Guidance and conclusions, and

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<ul style="list-style-type: none"> • its Combined Heat and Power Supplementary Report (5.4.1, REP2-012), which contains a heat export strategy and a further demand analysis as well as a letter from Peabody who are driving forward the regeneration of Thamesmead and who confirm the Applicant's commitment to delivering CHP from both RRRF and the proposed REP. <p>3) In addition, the independent study carried out by Ramboll in the context of RRRF, recognises that there is a future demand for heat from both RRRF and REP and this is despite not including key future development (such as the 11,500 home Thamesmead Waterfront development) in its assessment.</p> <p>4) EN-1, paragraph 4.6.12, does not require a generating station development consent order to always contain a CHP requirement and indeed there have been generating station orders that have been made without such a requirement (for example the Progress Power (Gas Fired Power Station) Order 2015 and the Millbrook Gas Fired Generating Station Order 2019 to name two). Rather EN-1 states that "The [Secretary of State] may wish to impose requirements to ensure that the generating station is CHP-ready...". The requirement in the NPS is therefore 'CHP-Ready'. The Proposed Development will be CHP-Enabled, with the necessary infrastructure included in Schedule 1 to the draft Development Consent Order. The Proposed Development, therefore, already goes over and above the NPS requirement.</p>
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,	1) There is no justification to restrict the commencement of development until such time as there is a " <i>demonstrable need for heat to be exported....</i> ". Such a requirement fails the planning tests for requirements on numerous grounds. The restriction is not necessary,

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	<p>relevant to planning and to the development to be permitted. It is also not precise or reasonable, given the Applicant has no control over the time of future development by other developers.</p> <p>2) The reason given for the restriction is that the ERF would be a carbon producer, not fulfil the objective of EN-3 and would contribute to climate change. To the contrary, the ERF is not only a generating station but will also move waste up the hierarchy away from landfill. It is therefore right to assess the ERF in carbon terms against landfill. As has been shown in the Carbon Assessment (8.02.08, REP2-059), the ERF will have a considerable carbon saving against landfill in power-only mode, when it would also displace gas-fired generation, and this would increase in power+heat mode. In addition, despite not needing to satisfy the London Plan policy given the primacy of the NPS, the Combined Heat and Power Supplementary Report (5.4.1, REP2-012) demonstrates how the ERF will satisfy the London Plan's CIF policy of 400 grams of carbon dioxide equivalent generated per kilowatt hour in power-only mode. Quite simply, the ERF, will be both low carbon and partially renewable and have a carbon saving. The ERF falls squarely within the Government's policy on sustainable development, and that is why energy from waste facilities are named technologies in NPS EN-1 and NPS EN-3, which have been through an Appraisal of Sustainable (which looked at alternatives to the NPSs) and which allocated substantial weight to the energy types identified in them.</p> <p>3) No amendment required to Requirement 20.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
10.16	<p>The GLA would also wish to see the following:</p> <ul style="list-style-type: none"> ■ 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; 	<ol style="list-style-type: none"> 1) Work Number 3 in Schedule 1 of the draft Development Consent Order contains the CHP infrastructure. Work Number 6 contains the necessary pipework and cables to take the CHP infrastructure to the REP site boundary and Work Number 7 contains the necessary pipework and cables to take the CHP infrastructure to a potential user - the future Data Centre provider in plots 02/44 and 02/49 as shown on the Land Plans. These Work Numbers are also shown on the Work Plans. 2) As to the detail, this will be provided pursuant to Requirement 2 – detailed design approval – which refers to Work Numbers 3 and 6 (the CHP infrastructure to the edge of the REP site). 3) Therefore, no amendment required.
	<p>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; and</p>	<ol style="list-style-type: none"> 1) The Applicant is content to change "<i>consider opportunities</i>" to "<i>assess potential opportunities</i>" in R20(2)(a) and refer to a Good Quality CHP scheme (as defined in CHPQA Standard issue 3). This amendment has been made in Requirement 20 of the dDCO (3.1, Rev 2, submitted at Deadline 3). 2) R20(1) requires the CHP review to be submitted to the relevant planning authority for approval. No amendment required. 3) R20(4) currently provides for on-going review every 5 years. The Applicant chose this on the basis that the current studies undertaken have taken approximately 24 months. The Applicant has amended 5 years to 4 years which will allow sufficient time for a study (which is also a horizon watching study) to be undertaken before the next one is triggered. The contents of the CHP review is contained in

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
		<p>Requirement 20(2).</p> <p>4) The Applicant has amended Requirement 20 in the dDCO (3.1, Rev 2, submitted at Deadline 3) to include a requirement to install the plant and pipework to the site boundary once the required sizing details of the district heat network are known. This is separate to the list of actions in Requirement 20(2)(b), which means it is not subject to the "<i>material additional cost</i>" reference in Requirement 20(2)(b). This was a specific request at the DCO Hearing, and the Applicant is content to make this amendment.</p>
	<p>The establishment of a working group to progress.</p>	<p>The Applicant has amended Requirement 20 in the dDCO (3.1, Rev 2, submitted at Deadline 3) to include reference to the establishment of a working group.</p>
<p>10.17</p>	<p>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</p>	<p>1) The ERF has two priorities - first, to generate low carbon renewable electricity. This need is established in NPS EN-1 and is marked as "urgent." Therefore, there is a need for the ERF.</p> <p>2) The second priority is to provide much needed waste capacity and to provide that capacity higher up the waste hierarchy. This need has been established in the evidence that the Applicant has submitted in Annex A to the Project and its Benefits Report (7.2, APP-103) and in the Supplementary Report to the Project and its Benefits Report (7.2.1, REP2-045), which also contains a rebuttal to the GLA's assertions by Tolvik Consulting (whom the GLA seek to rely on).</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	<p>3) These two priorities match those in the NPS EN-1 and EN-3 (see paragraph 2.5.2 of NPS EN-3), which is the overriding policy test.</p> <p>4) In any event, the ERF is both a carbon saving facility and will meet the CIF London Plan policy without the export of heat – see paragraph 10.15 above.</p> <p>5) There is no planning policy justification, therefore, in either the NPSs or in the London Plan for the GLA to require a financial contribution for the construction of a heat main to deliver heat.</p>
10.18	<p>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.</p>	<p>1) No policy justification is provided for this request and, in any event, the Applicant does not consider any such request satisfies the planning obligation tests. The request to invest in an extension of the heat network is not necessary to make the ERF acceptable (for the reasons set out in paragraph 10.17 above), is not directly related to the ERF and is not fairly or reasonably related in scale and kind to the ERF.</p> <p>2) The Applicant assumes that this request is for the Applicant to provide some form of "community benefit" payment to the GLA, which is outside the planning regime.</p>
<p><i>Additional Requirements</i></p>		

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
10.19	<p>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:</p> <p>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;</p>	<ol style="list-style-type: none"> 1) Requirement 14 of Rev 1 of the draft DCO (3.1, REP2-006), places a daily restriction on the number of heavy commercial vehicles delivering waste to the ERF, being 90 in and 90 out per day; save in the event of a jetty outage. The Applicant has updated Requirement 14 to also apply to the Anaerobic Digestion facility and remove the ability to use any surplus road transport movements from the existing RRRF facility. This amendment is made in the dDCO (3.1, Rev 2, submitted at Deadline 3). This will mean that the majority of waste will be delivered by river. 2) Requirement 14 requires all bottom ash to be transported by River, except in a jetty outage.
	<p>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;</p>	<ol style="list-style-type: none"> 1) The operation of the jetty and the pier is governed by River Works Licences with the Port of London Authority. 2) It is not appropriate or justified to place such a requirement, as requested by the GLA and TfL, on the Applicant when the jetty and pier are shared assets. 3) Given Requirement 14, in the event that the jetty was not available and the reason was in the Applicant's control, then the Applicant would still be bound by the road traffic movement restriction in Requirement 14. Only where the reason is beyond the Applicant's control would there be a jetty outage. 4) No amendment required.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>Documentary records of the movements of all heavy commercial vehicles to/from the site to be made and retained for inspection;</p>	<p>Requirement 14 provides for such record. The Applicant has amended Requirement 14 at Deadline 3 to enable the relevant planning authority to inspect the records on reasonable request (this follows a request made at the Issue Specific Hearing on Environmental Matters held on 5 June 2019).</p>
	<p>A commitment that the proposed Anaerobic Digestion facility, Battery Storage unit and solar PV panels will be delivered within an agreed timeframe;</p>	<p>1) As stated at the Issue Specific Hearing on Environmental Matters held on 5 June 2019, the Applicant is prepared to discuss this with its technical team given the integrated nature of the detailed design and build.</p> <p>2) The Applicant is considering this request and will revert.</p>
	<p>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</p>	<p>1) Despite not needing to satisfy the London Plan policy given the primacy of the NPS, the Combined Heat and Power Supplementary Report (5.4.1, REP2-012) demonstrates how the ERF will satisfy the London Plan's CIF policy of 400 grams of carbon dioxide equivalent generated per kilowatt hour in power-only mode.</p> <p>2) There is no policy requirement, either in the NPS or in the London Plan, to require energy from waste facilities to include pre-treatment.</p> <p>As stated at the Issue Specific Hearing on Environmental Matters held on 5 June 2019, the Applicant is preparing a note on Duty of Care responsibilities and will submit this into the Examination. The note will set out reasons why the Applicant does not consider that there is any justification for the development consent order to contain a requirement on the types of waste to be treated at the ERF.</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>the facility was included in the DCO (2017) for North London Heat and Power Generating Station;</p>	
	<p>Air emissions to be limited to the limits assessed in the ES, i.e. the draft BREF limits;</p>	<ol style="list-style-type: none"> 1) The Environmental Permit will condition the emission limits which the ERF will be required to comply with. In its Environmental Permit application, the Applicant has applied for the same limits as set out in the Application which are the upper range of the draft BREF limits. This is the case for all emissions, except for NOX which, due to the Applicant's investment in abatement technology, is significantly lower than the upper range. The Application assessed a daily mean emission of 120, whereas the Environmental Permit application has applied for 75. This is explained in the Environmental Permit and Air Quality Note (8.02.06, REP2-057). 2) Given the Environment Agency requires the ERF to have continuous emissions monitoring, and as it is the Environment Agency that can properly enforce the emission limits, it is not appropriate for the Development Consent Order to duplicate the Environmental Permitting regime (as indeed is accepted by the NPS). 3) Accordingly, no amendment required.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	Air emissions from machinery used during construction should conform with the London NRMM Low Emission Zone; and	Please refer to paragraphs 10.4 and 10.5
	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.	Requirement 18 (Community Benefits) has been agreed with the London Borough of Bexley. This requirement requires the Applicant to submit an employment and skills plan for approval. No amendment required.
<i>Further issues to be considered</i>		
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	<ol style="list-style-type: none"> 1) The Applicant does not own or operate the vehicles that would bring the waste to the ERF and AD plants and therefore will have no influence over them. The correct target for this requirement would be the waste suppliers, which would include the local authorities. In any event, the Applicant is not aware of any London Plan policy that requires a development that would have deliveries to ensure that those delivers are in zero carbon vehicles. 2) The export of ash will be by barge only, as per Requirement 14 of the draft Development Consent Order. 3) No amendment required.

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>arrangements for delivery of feedstock from its suppliers;</p>	
	<p>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;</p>	<p>1) As was discussed at the Issue Specific Hearing on Environmental Matters held on 5 June 2019, the refinement of the Electrical Connection route at Deadline 2 means that there has been a significant reduction in the impact on buses during the construction of the Electrical Connection.</p> <p>2) There is no legal obligation on the Applicant to provide compensation for delays as a result of works to construct the Electrical Connection. There is no entitlement to compensation if a business, including bus services, is affected by road works undertaken by statutory undertakers or the highway authority – the circumstances here are no different. Therefore, there is no claim against the Applicant or indeed UKPN, who would be carrying out the works.</p> <p>3) No amendment required.</p>
	<p>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); and</p>	<p>The Applicant agrees that injection of biogas to the gas grid, or upgrade to vehicle fuel are the preferred options, as set out in paragraph 3.3.41 of Chapter 3 Project and Site Description (6.1, REP2-013). However, the Applicant is aware that there may be obstacles to the preferred option, principally (in the case of injection to grid) whether there is capacity in the local gas network to facilitate biogas injection, engineering of a gas delivery pipeline and securing of relevant (off-site) consents for the</p>

LIR Reference (Paragraph)	Summary of GLA's Comments	Applicant Response to LIR
	<p>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.</p>	<p>installation.</p> <p>In the case of upgrade of biogas to compressed natural gas (CNG) vehicle fuel, there would be a need to establish a market for the sale of vehicle fuel and secure associated licenses, and/or upgrade the waste delivery vehicle fleet to operate on this fuel source, which is outside of the Applicant's control. The Applicant has therefore allowed for an option to utilise biogas to generate electricity using CHP engines, if necessary.</p> <p>There is no planning policy requirement for the Applicant to guarantee the London Living Wage in respect of the Proposed Development. In any event, the vast majority of the jobs at the Proposed Development will be highly skilled jobs, at degree or above level. No amendment required.</p>
<i>Other DCO Requirements</i>		
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.	The Applicant is in advanced discussions with the Environment Agency over the wording of additional requirements.

1.10 Conclusion

1.10.1 It is considered that the Proposed Development is in compliance with national, regional and local planning policy and that the Applicant has responded fully to the points raised in this LIR.

1.10.2 The Applicant has provided further details in its response to the GLA's Written Representation (see the **Applicants Responses to Written Representations (8.02.14)**).