Riverside Energy Park

Applicant's response to East London Waste Authority Deadline 7 Submission

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1 Applicant's response to East London Waste Authority

1.1 Introduction

1.1.1 This document provides a response to the documentation submitted by East London Waste Authority at Deadline 7 (see **REP7-026**), which includes comments on:

- the location of Riverside Energy Park;
- existing riparian infrastructure;
- impacts of river operations;
- new riparian infrastructure; and
- heat demand and supply.

1.1.1 The Applicant's responses to the above matters are set out below.

1.2 The Location of Riverside Energy Park (REP)

Response

1.2.1 ELWA questions the logic of the location of REP next to an existing waste treatment facility. ELWA previously raised this concern within their Written Representation (see **REP2-066-068**). The Applicant provided a detailed response to this concern within **Section 3.1** of the **Applicants Responses to Written Representations (8.02.14, REP3-022).** A detailed commentary on the suitability of the site is set out in **Appendix A** of the **Statement of Reasons (4.1, REP2-008).**

1.2.2 The site location and appropriateness are firmly supported by both national and local policy. The Applicant has had regard to factors influencing site selection for 'Biomass and Waste Combustion' facilities as described in Section 2.5 of the NPS EN-3. This includes consideration of a viable electrical connection, a location which encourages multi-modal transportation, and exploration of local CHP opportunities.

1.2.3 Not only does the location of the REP site enable use of the River Thames, the REP site lies within designated Strategic Industrial Land and optimises an existing waste site. These site attributes are clearly supported in Policy SI8 (B.3) of the draft London Plan which states *"development plans should:…identify the following as suitable locations to manage borough waste apportionments:…Strategic Industrial Locations and Locally Significant Employment Sites"*, and Policies S18 and S19 of the draft London Plan which

seeks to optimise and safeguard the capacity of existing waste management sites.

1.2.4 The rational for REP's location does, as suggested by ELWA, support the Applicant's business case for the facility. It is imperative that any infrastructure of this nature is commercially viable. However, the site location and appropriateness are also firmly supported by both national and local policy, irrespective of the Applicant's adjacent RRRF. The Applicant therefore reiterates that siting REP adjacent to the existing Riverside Resource Recovery Facility (RRRF) is an appropriate choice of location and compliant with relevant policy.

1.2.5 **The Project and Its Benefits Report (PBR) (7.2, APP-103)**, demonstrates that, even with London's exiting waste infrastructure, London has a residual waste management infrastructure gap which urgently needs investment as was described at the Issue Specific Hearing on Environmental Matters on 5th June 2019, and provided in the Applicant's **Oral summary from the Issue Specific Hearing on Environmental Matters (8.02.19, REP3-027**).

1.2.6 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** (**Annex A** of the **PBR** (**7.2, APP-103**)), 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 Written Representation in the **Applicant's Responses to Written Representations** (**8.02.14**, **REP3-022**), is at least 1.5 million tonnes. The Applicant does not contest that in time, there may also be additional investment needed to replace existing older waste management infrastructure within London. However, this does not affect the 'need' for a new facility in the form of REP, in fact, it just highlights the fragility of London's existing waste management infrastructure.

1.2.7 ELWA appears concerned that opportunities for heat and power off take from REP are limited because the REP site is south of the River. The Applicant, within the **Combined Heat and Power Assessment (5.4, APP-035**), and the **Combined Heat and Power Supplementary Report (5.4.1, REP2-012)**, has clearly demonstrated the significant opportunities available to REP i.e south of the river, in relation to district heating. More information on this point is provided in **Section 1.6** below.

1.2.8 In relation to the use of the River Thames, the respondent states: *"this may be potentially beneficial to the environment in some circumstances, but does not necessarily make sense financially or environmentally in others"*. This statement is vague and provided without supporting evidence or justification, the Applicant therefore submits that the ExA should place limited weight upon this comment. The Applicant deduces that ELWA is asserting that the

limitations on transportation, i.e. the restrictions in place via **Requirement 14** of the **dDCO** (**3.1, REP5-003**) submitted at Deadline 5, necessitating a greater use of the River Thames for the operation of REP may make less financial and environmental sense in some circumstances. The Applicant disagrees with this assertion. It has had significant encouragement from other statutory consultees including the Port of London Authority (PLA), London Borough of Bexley (LBB) and the Greater London Authority (GLA) to maximise the use of the river in line with relevant policy, which the Applicant has sought to do. Furthermore, given the Applicant's existing fleet of tugs and barges, and that Middleton Jetty has been demonstrated to have operational capacity to receive additional deliveries by river, there is a commercial incentive for the Applicant to maximise the use of its existing river infrastructure network and river logistics expertise developed over its 100 years or so of operation.

1.2.9 Not only are the environmental and financial benefits of maximising the use of the River Thames clear, it also meets relevant policy, in particular Policy 7.26 of the London Plan which encourages *"increasing the use of the blue ribbon network for freight transport".*

1.3 Existing Riparian Infrastructure

Response

1.3.1 The Applicant notes and welcomes that ELWA *"acknowledges that this* [information provided in **REP6-002** regarding the headroom within the permitted tonnage limits at its existing riparian wharf infrastructure] *would appear to allow for the use of these sites as a means of transferring additional tonnage on to barges for onward transportation to the Riverside Energy Park"*.

1.3.2 ELWA continues however to question the ability of the Applicant's existing riparian waste transfer stations (WTS) to support the delivery of waste to REP.

1.3.3 The Applicant reiterates that the capacity of the existing riparian WTS's and their effects, which were assessed and conditioned as part of the planning and Environmental Permit consents for those facilities, is not a matter for consideration within the Examination of the REP Application.

1.3.4 The Applicant, within the **Applicant's response to the Examining Authority's Further Written Questions (8.02.60, REP6-002)** has provided information regarding the capacities of their existing, and planned WTS infrastructure. This demonstrated that the Applicant has sufficient permitted capacity within its existing river-based infrastructure to manage the proposed tonnage throughput of REP.

1.3.5 The Applicant notes ELWA's four points and confirms there are no planning/permit controls that would prejudice achieving the permitted tonnage. As the operator of the existing WTS the physical limitations of the existing WTS are understood by the Applicant. The Applicant is best placed to ensure the WTS are configured and managed to achieve maximum operational

efficiency and effectiveness through investment in staffing, operational equipment and maintenance regimes.

1.3.6 The relevant public bodies have been consulted throughout the pre-application, pre-examination and Examination process, including the Environment Agency, London Borough of Tower Hamlets and Thurrock Council, none of which have raised concerns regarding existing WTS capacity.

1.3.7 The Port of London Authority (PLA) has also been consulted and, as confirmed within their **Statement of Common Ground (8.01.07, REP3-016)** and their additional submission at Deadline 4 (**REP4-030**), has no concerns relating to the operation of REP, including the deliveries of waste, and are supportive of the Proposed Development.

1.3.8 The Applicant can confirm that the exiting jetty at the REP site has the capacity to accommodate the increased amount of activity generated by REP's operation. This is confirmed in the **Middleton Jetty Ops Review Workshop Note (8.02.29, REP3-034),** submitted at Deadline 3. It is in the Applicant's interest to ensure the internal operations of both REP and the RRRF are maintained effectively.

1.4 Impacts of River Operation

Response

1.4.1 ELWA raise the potential for impacts, particularly in relation to air quality, relating to moving waste along the river and make comment on the logistics of using the river for additional barge movements.

1.4.2 The **Environmental Statement** (**ES**), submitted with the Application, adequately assesses the effects of the Proposed Development on Air Quality, including effects arising from an increase in river freight movements. **Paragraphs 7.9.14 – 7.9.19** of **Chapter 7 Air Quality** of the **ES** (**6.1, REP2-019**) provides the assessment of emissions from river transport and concludes that: *"the magnitude of impact is therefore Negligible at all locations and river traffic impacts are considered not significant"*. The assessment is informed by a **Navigational Risk Assessment (NRA) (6.3, APP-067)** which, as explained in **Paragraph 3.8** of the **NRA (6.3, APP-067),** assumes all waste would be transported to REP by river and not by road in order to assess a worst case scenario.

1.4.3 The assessments within the NRA were undertaken on the basis of three scenarios, firstly maximising waste transfer from Smugglers Way (explained in **Paragraph 3.11** of the **NRA** (**6.3, APP-067**)), secondly transferring a larger proportion of waste to Tilbury whilst doubling the transfer from Smugglers Wharf (explained in **Paragraph 3.12** of the **NRA** (**6.3, APP-067**)) and thirdly introducing as an indicative location waste transfer from Barking Creek (explained in **Paragraph 3.13** of the **NRA** (**6.3, APP-067**)).

1.4.4 **Paragraph 7.1** (Point 2) of the **NRA** (**6.3, APP-067**) demonstrates that under the assessed scenarios, the operation of REP would increase the number of tug and tow movements. Between the three NRA Scenarios, this would give rise to only one additional movement to Tilbury and could result in one additional movement through Central London to Smugglers Wharf or one additional movement to Barking Creek per day and any associated movements of ash to Tilbury. The additional movements arising from REP are therefore very limited.

1.4.5 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 (based on International Maritime Organisation (IMO) Tier II emission standards (the same as currently used at RRRF)) are considered to be not significant, measures to further reduce emissions from the current fleet of tugs are being investigated by the Applicant. These include the use of biofuels/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.

1.4.6 ELWA highlights that considerations relating to additional quantities of waste moving along the river should be considered *"particularly if this activity requires more to be transported when the currents/tides are not favourable".* The Applicant highlights that tidal conditions were taken into consideration in the assessment presented in the **NRA** (**6.3, APP-067**) as explained at Paragraph 6.33 of that document: "*This risk assessment has used the representative scenarios described in Section 3 and assumes continued usage of day time tides only. Any movements which utilised night time tides would occur when there is less background traffic on the river and therefore would have lower risk scores than that assumed during this assessment*."

1.4.7 The response further asserts that a large number of additional containers and barges would be required to support the river transfer operation, and that the impacts of mooring and storing these would need to be assessed. As set out above the additional river movements arising from REP are in fact very limited; the existing mooring points utilised by the Applicant's current operations would also be used for the operation of REP and therefore there are no impacts from new mooring points to be considered within Examination of the REP Application. The Applicant confirmed to the PLA that no additional mooring points would be required during a meeting held between the parties in June 2018 as detailed in the minutes of that meeting submitted with the **Statement of Common Ground between the Applicant and the Port of London Authority (8.01.07, REP3-016**).

1.4.8 ELWA suggests that the PLA is best placed to advise on the impacts relating to river transport. The Applicant has undertaken considerable consultation with the PLA throughout the pre-application, pre-examination and Examination process. Indeed, at Deadline 4, the PLA confirmed in their submission (**REP4-**

030) "*We have developed, over a long period of time, a trusted and longstanding relationship with Cory. We know that Cory is an operator whose business model is focused on promoting and optimising the commercial use of the River Thames and in this regard, Cory's vision and values are firmly aligned with our own…. We consider the proposed Energy Park will ensure the River Thames continues to play a key role in helping London to manage its waste, meets its low-carbon energy generation needs. The Port of London Authority is therefore pleased to offer its support for these plans."*

1.4.9 A **Statement of Common Ground between the Applicant and the Port of London Authority (8.01.07, REP3-016**) has been signed and submitted to the Examination at Deadline 3. This confirms the PLA's support for the Application.

1.5 New Riparian Infrastructure

Response

1.5.1 ELWA suggest that much of the waste from the immediate catchment area is already passing through the existing RRRF facility. Here ELWA are referring to the household waste collected by the London Borough of Bexley. The Applicant would like to remind ELWA that REP is expected to provide capacity for the significant amount of commercial and industrial waste generated both within the immediate catchment and within London, that is currently exported to landfill or abroad for treatment. Furthermore, ELWA continue by suggesting that "*the extra tonnage to feed into the REP would probably have to come from further afield and would require longer initial distances to be traversed using road haulage".* Here ELWA are referring to waste being transported to the Waste Transfer Stations rather than REP itself. Therefore, as stated above, the Applicant reiterates that the capacity of the existing riparian WTS and their effects, which was assessed and conditioned as part of the planning and Environmental Permit consents for those facilities, is not a matter for consideration within the Examination of the REP Application.

1.5.2 ELWA appear concerned regarding the commercial viability of the Applicant securing funding to develop new riparian infrastructure, should it be required. As set out (in **Section 1.3** above) the Applicant has sufficient capacity within its existing permitted WTS to manage waste entering REP and is not reliant on new riparian infrastructure being developed.

1.5.3 **Chapter 6 Transport** of the **ES (6.1, REP2-017)** and **Appendix B.1**, the **Transport Assessment** to the **ES** (**6.3, APP-066**) assessed the reasonable worst case scenario of 100% delivery to REP by road. No significant effects were identified, including on London's Strategic Road Network. It should also be noted that Transport for London have raised no objection to the operational impacts associated with REP. The Applicant can confirm that the cap of 240,000 tpa included within **Requirement 14** of the **dDCO (3.1, REP5-003)** submitted at Deadline 5, relates to delivery of waste for both the ERF and Anaerobic Digestion facility within REP. Following further discussions between the Applicant and the London Borough of Bexley (LBB), it has been agreed to

further reduce the cap in **Requirement 14** to 40,000 tpa for the Anaerobic Digestion facility, and 130,000 tpa for the ERF (totalling 170,000 tpa) which will be reflected in the updated **dDCO (3.1, Rev 4)** to be submitted at Deadline 8a. Further information is provided in the **Applicants Response to the London Borough of Bexley's Deadline 7 Response (8.02.80)**. This Requirement was provided to demonstrate the Applicant's commitment to the use of the river.

1.6 Heat Demand and Supply

Response

1.6.1 ELWA makes a number of assertions in its response with regards to heat demand and supply which are not supported by evidence or justification.

1.6.2 The Applicant has set out in detail its methodology adopted for the purpose of heat demand assessment in **Table C.3** of **Appendix C** of the **Applicant's Response to the GLA Deadline 3 Submissions (8.02.35, REP4-014)**. The analysis undertaken by the Applicant is comprehensive, detailed and compliant with policy and industry best practice methodology. The conclusions of the analysis indicate that there is sufficient heat demand in the region south of the River to warrant heat supply from both REP and RRRF, and that synergy opportunities exist in terms of reliability and displacing fossil fuelled back-up plant, if both facilities were to supply heat to a network.

1.6.3 Provision of heat from both REP and RRRF would offer benefit by either or both of the following:

- increasing the volume of low carbon and renewable heat which would be supplied to heat consumers and consequently the associated benefits; and
- reducing or eliminating the need for conventional back-up boilers, in addition to displacing air quality impacts in close proximity to residential areas.

1.6.4 ELWA considers that the need for a common-systems outage at the ERF every two years is excessive, noting that "*such outages are not needed on anything like this sort of frequency*". It is not clear which plant(s) or operational experience ELWA is relying on in making this submission. It is demonstrably incorrect to suggest that ERFs require common-systems outages on a considerably less frequent basis than every two years.

1.6.5 The submission made by the Applicant in **Paragraph 3.1.25** of the **Applicant's Response to Written Representations (8.02.14, REP3-022)** regarding the need for common-systems outages at least every two years is correct. This maintenance provision is required to ensure compliance with the Pressure System Safety Regulations (PSSR) 2000[1], wherein Regulation 8

[1] http://www.legislation.gov.uk/uksi/2000/128/contents/made

obliges the user of an installed system (pressure systems such as high pressure water and steam pipework and pressure vessels, or compressed air systems, as installed at ERFs) to carry out inspections per a written scheme of examination. Regulation 12 of the PSSR further requires that the user of an installed system must ensure that the system is properly maintained in good repair, so as to prevent danger. This obligation typically requires maintenance activities to be carried out on a more frequent basis than the inspection regime defined in the written scheme of examination. Therefore, the suggestion that common-system outages occur on a much less frequent basis (than two years) is incorrect and not observed within the operational industry.

1.6.6 Since common-system (and boiler line outages) are required at RRRF and would be required at REP, there is an opportunity to schedule maintenance outages between REP and RRRF such that the arrangement can offset emissions that would otherwise be associated with conventional (fossil fuelled) back-up boilers supplying heat during periods of unavailability.

1.6.7 It is in the Applicant's interest to schedule common-systems outages in summer periods, and as ELWA notes, this would align with periods when the heat demand is at its lowest. ELWA's submission that "*in these circumstances, the thermal storage and local back-up boilers that any resilient heat network should include would be more than sufficient to cope with the demand until the EfW was ready to come back online*", is groundless without understanding the heat demand profile and capacity of both the thermal stores and any back-up plant to be installed. As set out in **Paragraph 3.3.3** of the **Combined Heat and Power Supplementary Report (5.4.1, REP2-012)**, staggering maintenance outages to ensure that heat supplies are maintained year-round would be possible, as both REP and RRRF would be exporting heat to the local area. This arrangement would not prohibit incorporation of additional back-up boilers by a district heating system operator if it so wished.

1.6.8 REP offers a significant carbon benefit, as set out in the Applicant's **Carbon Assessment (8.02.08, REP2-059)**, which demonstrates that the benefit of the REP ERF compared to landfill is about 137,000 tonnes of CO2-equivalent per year in power only mode, rising to 157,000 tonnes of CO2-equivalent per year in CHP mode. This shows that exporting heat from REP gives a carbon benefit compared to producing the same heat in gas-fired boilers. The Applicant has also shown, in **Section 4** of the **Combined Heat and Power Supplementary Report (5.4.1, REP2-012)**, that the GLA's Carbon Intensity Floor (CIF) policy is met without pre-processing of waste and under every operational scenario. Therefore, the overall emissions and environmental impact of the back-up solution (fossil fuel-based gas plant, as described by ELWA), is highly unlikely to be lower than REP, as suggested by ELWA.

1.6.9 ELWA questions "*whether a facility as large as the RRRF would actually require the support of the REP to serve the heat demand of the proposed 20,000 households at Burt's Wharf that the Applicant has highlighted in their response, given modern standards for insulation and energy efficiency in new-build homes.*" As a point of clarification, the 20,000 homes proposed as part of the Thamesmead regeneration programme are substantially located to the

west of the REP site (i.e. not at Burt's Wharf, which is a predominantly industrial area to the east and south of the REP site).

1.6.10 Regarding the ELWA's suggestion that an independent study of the likely demand for heat in the area could be commissioned, the London Borough of Bexley (supported by the GLA) has commissioned Ramboll to undertake a two-phase assessment considering heat demand in the region. Both phases of this study have been submitted to the examination. Ramboll projects a heat demand of 141 GWh per year, comprising a core scheme and a handful of additional developments in Erith. However, the core scheme proposed by Ramboll omits a significant volume of publicly announced and existing development which, if adequately accounted for, would warrant heat supply from both REP and RRRF. This matter is discussed in detail in **Table C.3** of **Appendix C** of the **Applicant's Response to the GLA Deadline 3 Submissions (8.02.35, REP4-014)**.

1.6.11 Ramboll concludes in paragraph 5 of Section 7 of its Phase 2 feasibility study 'Thamesmead & Belvedere Heat Network Feasibility Study' that "*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.*" This is an entirely realistic prospect given the under represented heat demand projections reported by Ramboll, and the significant volume of surplus heat demand in the locality which is not accounted for within its Core Scheme. It is also noteworthy that since the Mayor considers that housing build out rates need to rapidly increase, heat sources beyond RRRF will be required.

1.6.12 Ramboll's Phase 2 feasibility study also recognises that the provision of supplementary heat generation and storage is required to support year-round demand which is proposed to comprise a mix of centralised and distributed plant. In paragraph 2 of section 7 of Ramboll's Phase 2 feasibility study, Ramboll reports back-up requirements as a necessity. The benefits of connecting both REP and RRRF to a network would offer the optimum case in terms of low carbon heat year round by reducing and/or eliminating the need for conventional back-up boilers, in addition to displacing potential air quality impacts in close proximity to residential areas.

1.6.13 The Applicant further notes that it is not only the new 20,000 households to be delivered under the Thamesmead regeneration programme which present significant volume of heat demand. As set out in **Paragraph 3.2.3** of the **Combined Heat and Power Supplementary Report (5.4.1, REP2-012)**, businesses located to the east and south of the REP site along Burt's Wharf present an additional estimated total heat demand of 291 GWh/annum, which could be engaged for connection in the event that housing proposals did not materialise to the extent anticipated.

1.6.14 ELWA suggest that "*the Examining Authority may wish to look at a recently approved DCO for a similar facility and the relationship between tonnage throughput and heat availability there, to inform consideration of the need for*

the REP in this regard". The Applicant highlights that paragraph 2.5.13 of NPS EN-3 states that *"Throughput volumes are not, in themselves, a factor in IPC decision-making as there are no specific minimum or maximum fuel throughput limits for different technologies or levels of electricity generation. This is a matter for the applicant."* Further, paragraph 3.3.24 of NPS EN-1 makes clear that it is not the Government's intention to set *"targets or limits on any new generating infrastructure to be consented in accordance with the energy NPSs."* This is a question for the Applicant and is a market led position. The relationship between tonnage throughput and heat availability (assumed to mean heat export capacity) has no impact on the consideration of the need for REP. The important point to recognise is that the ERF at REP has been designed to offer a large volume of heat export relative to its size, and there is sufficient heat demand in the region to warrant heat supply from both REP and the existing RRRF. At the proposed capacity, the CHP scheme at REP would qualify as 'Good Quality CHP' as accredited by Combined Heat and Power Quality Assurance (CHPQA). CHPQA is Government's best practice programme and certifies that the scheme meets best practice efficiency thresholds.

1.6.15 The Applicant has, nevertheless, explored the matter of comparative Orders with reference to the North London Heat and Power Project (Edmonton EcoPark). Requirement 7 of the Recommended DCO within the Examining Authority's Report of Findings and Conclusions specifies "*The waste permitted to be managed at the authorised development must not exceed 890,000 tonnes per annum*". Paragraph 2.4.10 notes that "*the actual likely peak heat demand is expected to be about 35MWth*". At Edmonton EcoPark, heat export provision is therefore equivalent to 0.0393 kW/tonne of waste processed.

1.6.16 At REP, the proposed maximum throughput is 805,920 tonnes per annum, and the proposed heat export capacity is 30 MW for district heating, plus a further 3 MW to supply the Anaerobic Digestion facility. Heat export provision would therefore be equivalent to 0.0409 kW/tonne of waste processed. Proposals for REP therefore offer a marginally increased level of heat export relative to a comparable recently consented facility.

1.7 Summary

1.7.1 ELWA has raised several matters in its Deadline 7 submission (see **REP7-026**) relating to the location of REP; the existing and new riparian infrastructure; potential impacts on river operations; and heat demand and supply.

1.7.2 The Applicant has provided responses in the above sections to each of these matters. In summary, the Applicant has demonstrated that the location of REP meets relevant national and local policy with regards to siting waste management and energy generation infrastructure and its location has also been selected to ensure that it is commercially viable for the Applicant which ensures deliverability of the benefits arising from the Proposed Development.

1.7.3 The Applicant has demonstrated that the existing WTS, and its existing river-based infrastructure, have sufficient capacity to manage the proposed tonnage throughput of REP without relying on new riparian infrastructure. However, should potential additional opportunities for WTS emerge, the Applicant will judge the commercial viability of these opportunities.

1.7.4 REP will maximise the use of the River Thames without giving rise to significant impacts on air quality; and the **NRA** (**6.3, APP-067**) undertaken as part of the DCO Application, which demonstrates no significant effects, has been reviewed and agreed to by the PLA, as confirmed in the **Statement of Common Ground between the Applicant and the Port of London Authority** submitted to the Examination at Deadline 3 **(8.01.07, REP3-016)**.

1.7.5 ELWA states that it remains concerned that the heat demand for the REP is being overstated; as set out above the Applicant has provided detailed information in support of the potential provision of heat from both REP and RRRF. The local opportunities, south of the River Thames, have been explored through the Ramboll studies commissioned by the London Borough of Bexley which demonstrate that there is potential need for heat export from both REP and RRRF. The Applicant's **Combined Heat and Power Supplementary Report (5.4.1, REP2-012)**, and subsequent submissions which detail that the assessment approach is comprehensive, detailed and compliant with policy and industry best practice methodology, clearly demonstrates that there is sufficient local heat demand to warrant heat supply from both REP and RRRF.