GREATER**LONDON**AUTHORITY

**planning report D&P/3519/03**

**22 March 2016**

# North London Heat and Power Project

**in the London Borough of Enfield**

**Planning Inspectorate Reference: EN010071**

## National Infrastructure Project Development Consent Order application – Written representation

Planning Act 2008 (as amended), Overarching National Policy Statement for Energy, July 2011, and National Policy Statement for Renewable Energy Infrastructure, July 2011.

## The proposal

The North London Heat and Power Project would comprise of an energy recovery facility (ERF) using waste as a fuel and capable of an electrical output of approximately 70 megawatts (MW) and heat output of approximately 35MW. The proposal has a heat link potential via the Lee Valley Heat Network (LVHN).

As the North London Heat and Power Project would generate energy over 50MW it is classified as a Nationally Significant Infrastructure Project (NSIP) under section 14 (1) (a) and section 15 (2) of the Planning Act 2008. National Policy Statements (NPS) EN-1 (overarching National Policy Statement for Energy and EN-3 (National Policy Statement for Renewable Energy Infrastructure) both apply to the North London Heat and Power Project.

## The applicant

The applicant is **North London Waste Authority (NLWA)**.

## Strategic impacts

Waste

- The proposed facility will be an asset to London in achieving net waste self- sufficiency and will establish a major source of low to zero carbon heat for use by others that will contribute towards London's climate change targets.
- Reuse and safeguarding of an existing waste site supported by London Plan policy 5.17, the draft North London Waste Plan and Enfield Core Strategy (Policy 22).

Heat

- The heat demand in the area is greater than that calculated however mechanisms are being put in place to distribute to homes via the LVHN.
- The carbon intensity floor policy (CIF) required by policy 5.17/paragraph 5.85 can only be achieved if the ERF's heat capacity and offtake is secured.
- The steam turbine should be future proofed and of a specification to avoid retrofitting and closure later.

Air quality and environmental matters

- The new ERF will mitigate the nitrogen oxides (NOX) via a flu gas cleaning system. The injection of a lime slurry to reduce the acid gasses through the installation of a catalytic reduction system is supported as this will ensure air quality and health impacts are addressed from the outset. This technology is not used in the UK, however it is used in Continental facilities which are exceeding EU emissions targets and therefore the ERF would go beyond the minimum requirement. Further, the Environment Agency, the permitting authority, would ensure that the regulations are being met.
- The GLA would like the inclusion of the guidance relating to non-road mobile machinery (NRMM) contained within the GLA Control of Dust and Emissions During Construction and Demolition SPG within the DCO. (see link)- https://www.london.gov.uk/priorities/planning/publications/the-control-of-dust-and-emissions-during-construction-and
- Sustainable drainage at the site, biodiversity and noise mitigation is secured and under review by the relevant statutory bodies and GLA officers are certain that their comments would influence the final DCO.

1 NLWA has submitted a Development Consent Order application to the Planning Inspectorate for the project outlined above. Section 60 (2) (B) of the 2008 Planning Act sets out that the Planning Inspectorate is also required to invite the GLA to submit a local impact report (Section 60 (2) (B) of the Act). The GLA may also make representations on the proposal.

2 The GLA is therefore making a written representation, submitting a local impact report (LIR), which focuses on the higher level strategic matters and a Statement of Common Ground (SoCG). These submissions will be examined and the Secretary of State will have regard to these.

3 This representation should be read in conjunction with the Mayor's detailed LIR since this report provides headline points rather than specifying policy details or addressing more local matters concerning the environmental impacts.

4 Transport for London (TfL) is part of the GLA group and thus the LIR has sought to address the more strategic planning and transport issues of the proposal, however, as TfL has concerns regarding TfL land-take issues as part of the proposal and specific responses to make to the Inspector's questions, it will respond separately to express its concerns. Similarly, TfL has a separate SoCG with NLWA.

5 The NLWA was required to undertake two rounds of consultation as part of the statutory planning process, before it submitted the application to the Planning Inspectorate (PINS). The first consultation phase ran between November 2014- January 2015 and the second consultation (phase 2) between May-June 2015. The GLA submitted representations to the phase 1 and 2 consultations by the NLWA in January 2015 and June 2015 (ref: D&P/3519/01 and D&P/3519/02).

## Principle of development

## Waste

Policy safeguarding

6 The site carries strategic importance as an 'existing' waste site, which is safeguarded by policy 5.17 of the London Plan. The site is also safeguarded for waste use in the Enfield Core Strategy (policy 22-"Delivering Sustainable Waste Management"). The policy states that the Council will continue *"to support the use of the Edmonton Eco-Park as a strategic waste site and*

*working with the North London Waste Authority and the site operator to maximise the use of the site with more sustainable and efficient waste management processes including the future decommissioning of the current incinerator. This includes exploring opportunities for local energy provision to support new development at Meridian Water to the south."* The Council's Edmonton Eco-Park Planning Brief SPD also promotes the on-going use of the existing site to manage and generate heat and power. These policies are supported in strategic planning terms. The Council's Central Leeside AAP also states, the redevelopment of the EcoPark site, through a design-led approach will *"provide a distinctive and well-functioning environment with a high quality of design, landscaping (including ecological enhancement), materials and finish, integrated with proposals in the wider area of regeneration."* Continued use of the site for waste is therefore supported.

Retention of waste use

7 The proposed ERF will have the capacity to manage a greater waste through-put than the current EfW facility and is supported. The proposal supports London Plan waste policies 5.16 and 5.17–namely for the benefit of North London Boroughs meeting waste apportionment and helping London become 100% net waste self- sufficient. The facility will support additional bulky waste recycling capacity, make use of an existing brown field and waste site, manage waste close to source, and divert over 500,000 tonnes of waste from landfill.

8 It is understood that the NLWA proposes to retain the existing areas of the site that are not utilised in the redevelopment of the replacement facility for other potential waste management activity in the future; though this is likely to form part of a further application post approval of this proposal.

9 Overall, the NLWA proposal for a heat and power facility is strongly supported in strategic terms because of the wider sustainability gains that it will achieve, not only for the north London, Upper Lee Valley area but also since it will contribute towards net self-sufficiency in London as a whole. The proposal has the potential to achieve the carbon intensity floor target (addressed in the energy section of this report) and deliver low carbon heat through connection with the planned Upper Lee Valley Heat Network and future heat recipients/suppliers.

10 It is the understanding of GLA officers that the North London waste planners, in developing the North London Waste Plan (NLWP) have been working closely with the NLWA. The timescales of the NLWA are such that the planning process could not wait for the NLWP to be adopted first. However, it is known that the NLWP is supportive of the approach being taken and the NLWP reflects the projections for waste growth provided by NLWA. The management of local authority collected waste (LACW) will therefore continue to be managed by the proposed ERF once the EfW facility has reached the end of its operational life and is therefore supported in strategic waste management terms. (Paragraph 4.2.8 of the planning statement- waste need case).

11 In reviewing the waste processes in the submission and based on discussions between NLWA and the GLA Waste Management, GLA officers would like to clarify that incinerator bottom ash, produced as a residue from the EfW incineration process is not considered to contribute towards local recycling rates, and consequently does not count towards meeting waste apportionment. Waste going for energy recovery in London does counts towards apportionment. Criteria for what activities count towards apportionment are set out in Policy 5.17 para 5.79.

*12* The Mayor through his London Plan and Municipal Waste Management Strategy, expects London to be recycling half of the waste coming from households by 2020 rising to 60 percent by 2031. He states in the latter document- *"The residual waste which cannot be prevented in the first place, or put to good use, will be harvested to create greener energy and fuel. By embracing clever,*

*cleaner technologies, we can also develop a greater capacity to deal with London's waste within our boundaries."*

13 The GLA policy approach is akin to that of DEFRA, whereby a commitment is embedded in the London Plan to drive waste up the hierarchy of waste management. The London Plan establishes policies which require waste authorities to manage as much of their waste locally as practicable, working towards managing the equivalent of 100 per cent of London's waste within London by 2031 (London Plan, 2016, policy 5.16- Waste net self-sufficiency).

14 Recycling levels in London have flat lined and the Mayor is keen for London Boroughs to do more particularly at a time when the population and number of households in London is significantly rising. The Mayor proposes through his London Plan and the Municipal Waste Management Strategy, that by 2020, London should be recycling half of the waste coming from households rising to 60 percent by 2031. He states in the latter document- *"The residual waste which cannot be prevented in the first place, or put to good use, will be harvested to create greener energy and fuel. We estimate the economic value of this to be more than £80 million. By embracing clever, cleaner technologies, we can also develop a greater capacity to deal with London's waste within our boundaries."*

*15* The applicant needs to demonstrate how they will support NLWA waste collection authorities collectively meet their 50 per cent recycling target by 2020 through front end kerbside recycling in addition to the proposed pre-treatment processes onsite.

## Upper Lee valley Opportunity Area/Lee Valley Heat Network

16 The Edmonton incinerator is located within the Upper Lee Valley (ULV) Opportunity Area identified in the London Plan and supported by London Plan policy 2.13. Paragraph 2.62 of the London Plan states that planning frameworks for opportunity areas *"should focus on implementation, identifying both the opportunities and challenges that need resolving such as land use, infrastructure, access, energy requirements, spatial integration, regeneration, investment, land assembly and phasing."*

17 The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) focuses on creating growth, sustainability and housing for this important area of north London which covers 3,884-ha and which contains land under four different local authorities: Enfield, Haringey, Waltham Forest and Hackney. The most relevant objective of the OAPF in regard to this proposal is that of a Lee Valley Heat Network being linked to the Edmonton Eco Park. Haringey, Enfield and Waltham Forest Councils are all considering implementing decentralised energy systems. These would localise the production of energy, and could enable heat to be provided to properties via heat networks transporting water or steam. (ULV OAPF DIFs final report, Sept 2015).

18 The ULVOAPF states: *"The Edmonton Eco Park is the preferred location as the supply hub for the Lee Valley Heat Network (LVHN), where best use can be made of existing generating facilities. Provision will still need to be made for an energy centre within the Eco Park that has the ability to operate top-up and standby steam boilers….Location elsewhere would result in significant extra capital costs and reduce the scheme's overall viability. The network will have the flexibility to adapt and expand according to future energy demands and new heat sources that are identified and to changes in regulation. Figure 5.1 of the document suggests possible directions for future expansion."*

19 GLA officers have been working with the NLWA and Enfield Council (and to a lesser degree with Haringey and Waltham Forest Boroughs) to develop a strategic heat network throughout the Lee Valley Heat Network area, taking heat from the existing EfW plant at Edmonton and supply affordable low carbon heat for heating buildings and industry.

20 Heat networks require substantial levels of investment and having a 40 year plus life, the new ERF will give the heat network investors confidence that heat will continue to be available following the closure of the existing plant. The replacement of the existing facility will therefore assure the continuity in providing energy to the proposed 5,000 new homes in the Meridian Water (a London 'Housing Zone') area and provide for further heat supply capacity for any heat network expansion. This proposal is therefore strongly supported, being a key aspiration of the Upper Lee Valley Opportunity Area Planning Framework and in meeting the policies of the London Plan expanded on below.

## Energy

21 New waste management facilities should reach a high standard of sustainable design and construction, be future proofed and avoid prohibitively costly retrofitting at a later date. It is necessary for the proposal to be as explained in the Mayor's District Heating Manual for London (2.2):

*"Larger scale decentralised energy schemes incorporating district heating networks offer an affordable way of achieving low carbon energy supply in densely populated areas such as London, meeting domestic, commercial and some industrial space heating and domestic hot water requirements."*

22 The NLWA has met with GLA officers and has agreed to work with the GLA at the time of selecting the steam turbine production technology to ensure an efficient and commercially viable energy supply arrangement capable operating across a range of heat demands in the future.

23 The Mayor of London has previously stated his desire to assist NLWA in the development of a heat distribution network to provide the waste heat from the Edmonton plant to local buildings. This assistance took the form of the Upper Lee Valley Energy Strategy and the subsequent feasibility studies resulting the in the LVHN project. The application refers to electrical output and the likely heat output capacity which momentarily is 35MW under the ERF proposal and 20MW under the pilot attempt from the existing EfW plant.

24 The ERF would supply electricity and operate as good-quality combined heat and power (CHP) mode, which is supported however the plant must meet the carbon intensity floor required by the London Plan.

London Plan policy 5.17 e states:

*"achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings. Facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum 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 5.85 below).

The supporting paragraphs (5.85 and 5.85A) to this policy then state,

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.*

5.85A

25 *"The carbon intensity floor has been set for waste-to-energy activities in London to achieve at least a positive carbon outcome, whereby the direct emissions from the technology are offset by emissions savings from the generation of low carbon energy in the form of heat, electricity and transport fuel. This would, for example rule out new mass burn incineration facilities of mixed waste generating electricity only, but may allow combustion of waste with high biomass content where both heat and power generated are used. This approach supports technologies able to achieve high efficiencies particularly when linked with gas engines and hydrogen fuel cells. More information on how the carbon intensity floor has been developed and the ability to meet it can be found in Policy 2 of the Mayor's Municipal Waste Management Strategy. Waste to energy facilities should be equipped with a heat off-take from the outset such that a future heat demand can be supplied without the need to modify the heat producing plant in any way or entail its unplanned shutdown. It should be demonstrated that capacity of the heat off-take meets the carbon intensity floor at 100% heat supply. In order to ensure the carbon intensity floor remains relevant, the Mayor will consider reviewing the CIF level in future iterations of the London Plan."*

26 It is essential that NLWA works in co-operation with the GLA heat network team when it decides the turbine specification as in the CHP Development Strategy page 21 paragraph 4.4.3, the applicant has stated that *"the ERF can be designed to supply upto 160MWth of heat. Heat supply would impact power generation. Gross power generation would reduce to circa 15MWe with 160Mwth of heat supply."* Paragraph 4.4.5 states that *"the diversion of steam from the turbines would result in a drop in electricity production."*

27 The NLWA and the GLA agreed at that the above ERF steam turbine heat supply strategy that gave rise to the 160MWth capacity would result in an uncompetitive heat price. Both parties agreed to co-operate to establish an economically-optimised steam turbine heat off-take arrangement and supply capacity and to soft-market test the design specification.

28 The Need Assessment (AD05.04), October 2015, states in section 2.2 the approach taken to calculate carbon intensity floor (CIF). Having reviewed this, the calculation is based on known heat demand derived from the LVHN project meeting the minimum CIF requirement, and not the based on the actual energy output of the facility. However, there are expectations of the steam turbine heat capacity to be maximised and consistent with the economic production of heat that would allow achievement of the CIF.

29 The CIF can be met on the optimisation of the turbine and not the demand of the LVHN. The applicant is asked to supply a CIF assessment based on the design specification and output capacity.

30 It is not the intension for the GLA to specify the buyers of that heat but to co-operate with the NLWA in their determination of the steam turbine heat off-take capacity and that it is able to competitively supply future seasonal heat loads i.e. whereby in the winter more heat can be supplied and in the summer more electricity generated.

31 The GLA has experience of SELCHP energy from waste plant in London whose steam turbine was procured with a heat off-take capability but had not heat customers for almost 20 years. Since its inception, SELCHP only generated electricity which feeds into the National Grid until two years ago when the heat extraction use utilised to produce hot water for a new district heating network. The linking with a new heat network in Southwark has meant that the facility

now supplies low carbon heat to five housing estates in South East London. The Mayor of London is an advocate for local heat and power supplies as these not only save Londoners money, reduce carbon emissions, provide a sustainable, cost effective energy supply and allow for the decommissioning of traditional gas boilers which are high carbon polluters. Such plants can be productive in a manner of ways as a result, if they are carefully selected.

*32* Within the draft DCO, it is clearly stated in s.6(1) that the applicant is seeking authorisation to operate *"the electricity and heat generating station" with details of the development in Schedule 1 (1)(e) stating that the construction of an electricity and heat generating station is to include "steam turbine(s) for electricity generation including equipment for heat off-take"*.

*33* In addition Schedule 2, paragraph 19 of the draft DCO requires that *"The authorised development must be provided and maintained within Work No. 1a to enable steam pass-outs and/or hot water pass-outs and reserve space for the provision of water pressurisation, heating and pumping systems for users of process and space heating located outside the order limits, and its later connection to such systems should a commercial arrangement be identified for combined heat and power which is economically viable."*

34 NLWA proposes that the scheme would be CHP enabled and that any heat off-take would be governed by two factors: firstly the existence of an actual heat demand during the life of the scheme; and secondly that any arrangements for the provision of heat be commercially viable. At present, NLWA has stated to GLA officers that neither of these two pre-conditions exists so it impossible to specify a set level of heat off-take.

35 NLWA have stated that the actual level of electricity output will be dependent on the level of heat off-take at any given point. NLWA has nevertheless engaged in ongoing commercial discussions with the Lee Valley Heat Network (LVHN) for the supply of up to 35MWth to their proposed decentralised energy network (DEN) which is still in the pre-planning phase. This is supported, however the above cited policies demonstrate that to future proof the facility, the correct technology (steam turbine) should be secured. GLA officers note that the level of heat off-take is purely an aspirational maximum heat demand by LVHN rather than an actual forecast level or secured demand at this stage.

36 It is understood from NLWA through the ongoing discussions had that NLWA has discussed kick-starting their scheme by tying their proposed network into the existing Energy-from-Waste (EfW) facility to supply an initial level of around 11MWth. In time, it is proposed that when the LVHN's DEN and the NLHPP are both established, the proposed ERF would replace the EfW as the source of heat. The DCO application indicates the routes for heat supply pipes in the accompanying CHP Development Strategy and space reserved within Schedule 2 of the draft DCO. This is supported. The draft S106 is also the mechanism for securing heat provision to LVHN. However, to enable the steam turbine to be future proofed in terms of heat supply capacity and enable all of the above policy drivers to be delivered it is necessary for the specification of the ERF steam turbine to establish the pressure at which the controlled extraction is provided and its heat supply capacity. The GLA is addressing this within the SoCG with NLWA.

37 NLWA has taken on board this feedback and while it is unable to specify future levels of heat provision within the DCO, it has nonetheless agreed to work with GLA officers during the future soft market testing and specification of the steam turbine at the procurement phase (anticipated to be 2017-18) to ensure the ability to optimise the ERF's heat supply capacity. (This is reflected in the drafting of the SoCG).

38 The policy basis to secure these measures through the SoCG are to ensure compliance with London Plan paragraph 5.85B - Examples of 'demonstrable steps' as outlined in Policy 5.17 B e 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."*

39 To assist in the delivery of 'demonstrable steps' the GLA can help to advise on the heat demand opportunities for waste to energy projects, particularly where these are linked to GLA supported Energy Master Plans.

40 The S106 is with Enfield Council, however the specification of equipment which would be the driver of the heat network is as explained above and therefore the GLA consider this matter crucial as part of it's agreement with the NLWA and is drafting wording in the SoCG to that effect.

41 The delivery of this project will have a positive impact on London's economy by contributing towards the sustainable delivery of electricity and heat supply. It is in line with London Plan policy subject to the impacts set out in this report being satisfactorily dealt with.

## Biodiversity

42 London Plan policy 7.19 indicates that such sites should be given protection commensurate with their importance. London Plan policy also sets out that if development is permitted the following hierarchy should apply: E, 1: avoid adverse impact to the biodiversity interest, 2: minimise impact and seek mitigation; 3: only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

43 At this stage the GLA are content that the application meets London Plan policy, and that the impacts on the adjacent SSSI are likely to be negligible. The other impacts are more significant, but are temporary and will be mitigated by the proposed landscaping strategy.

## Air quality/and other environmental impacts

44 The applicant should be required to refer to guidance relating to non-road mobile machinery (NRMM) contained within the Control of Dust and Emissions During Construction and Demolition SPG (see link)-

https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and

45 The SPG seeks to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London. It also aims to manage emissions of nitrogen oxides (NOx) from construction and demolition machinery by means of new non-road mobile machinery Ultra Low Emissions Zone (ULEZ). This SPG provides more detailed guidance on the implementation of all relevant policies in the London Plan and the Mayor's Air Quality Strategy to neighbourhoods, boroughs, developers, architects, consultants and any other parties involved in any aspect of the demolition and construction process; sets out the methodology for assessing the air quality impacts of construction and demolition in London; and identifies good practice for mitigating and managing air quality impacts that is relevant and achievable, with the over-arching aim of protecting public health and the environment.

46 The SPG, provides guidance on the implementation of London Plan policy 7.14 - Improving Air Quality, as well as a range of policies that deal with environmental sustainability, health and quality of life. Compliance with this document is required to ensure conformity with the London Plan and the Mayor's Air Quality Strategy and it therefore should be stated in the DCO or conditioned.

47 The new ERF will mitigate the nitrogen oxides (NOX) via a flu gas cleaning system. The injection of a lime slurry to reduce the acid gasses through the installation of a catalytic reduction system is supported as this will ensure air quality and health impacts are addressed from the outset. This technology is not used in the UK, however it is used in Continental facilities which are exceeding EU emissions targets and therefore the ERF would go beyond the minimum requirement. Further, the Environment Agency, the permitting authority, would ensure that the regulations are being met.

48 The proposals are acceptable in terms of London Plan Policy 5.12 Flood Risk and 5.13 Sustainable Drainage. A Flood Risk Assessment has been undertaken by Amec Foster Wheeler. The FRA confirms that the majority of the site is within Flood Zone 1, with part of the site within flood zone 2. There is no significant surface water risk identified at this site. The FRA goes on to identify that finished floor levels will be raised and that a flood emergency plan will be prepared. As an industrial facility which is less vulnerable to flooding and is located in an area of relatively low flood risk, the principle of the use of the site is acceptable.

49 The site already has an attenuation system. The proposed drainage strategy has been developed with advice from Enfield Council. It aims to achieve a Greenfield run-off rate up to the 1 in 100 year storm, through the use of rainwater harvesting, green roofs, permeable surfaces, filter trenches and 3x attenuation tanks. Residual surface water will be discharge to the Enfield Ditch. This approach represents good practice in urban rainwater management and is considered to comply with London Plan Policy 5.13.

50 Noise mitigation measures are secured through the DCO and a noise management scheme must be implemented and maintained as approved by the relevant planning authority-being Enfield Council.

51 Environmental mitigation is secured and under review by the relevant statutory bodies and GLA officers are certain that their comments would influence the final DCO through the examination process.

## Conclusion

52 Having reviewed the consultation documents and after meeting with the applicant, GLA officers are of the view that the proposed facility will be an asset to London in achieving net self- sufficiency and will allow for energy gains to be achieved, as proposed by the Council's Lee Valley Heat network proposals. The applicant is asked to provide more information on how they will support NLWA's constituent boroughs to achieve its 50% recycling target, and that the ERF facility meets the Mayor's carbon intensity floor CO2 standard, in order to be considered in general conformity with London Plan waste policy.

53 Strategically, the proposal will facilitate the objectives set out in the Upper Lee Valley OAPF and the London Plan. The likely cumulative impacts from waste and energy processing; transportation and air quality /noise/flood risk impacts will need to be assessed by the local authorities however the higher level comments in this report should be noted.

54 The applicant should be required to apply the guidance set out in the Control of Dust and Emissions During Construction and Demolition SPG. This will meet the requirements of policy 7.14 of the London Plan. This should be set out in the DCO.

55 Overall there are immense energy gains to be achieved from this proposal, not to mention waste diversion from landfill. The NLWA should continue to work with GLA officers in developing this proposal further to secure optimum decentralised energy opportunities from the energy/heat that will be generated at this site and address the energy matters raised within the report.

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for further information, contact GLA Planning Unit:
**Stewart Murray, Assistant Director – Planning**
020 7983 4271 email stewart.murray@london.gov.uk
**Colin Wilson, Senior Manager – Development & Projects**
020 7983 4783 email colin.wilson@london.gov.uk
**Justin Carr, Strategic Planning Manager (Development Decisions)**
020 7983 4895 email justin.carr@london.gov.uk
**Sukhpreet Khull, Case Officer**
020 7983 4806 email Sukhpreet.khull@london.gov.uk

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