

Chair of the Environment Committee



Caroline Russell AM

Chair of the Environment Committee

City Hall
The Queen's Walk
More London
London SE1 2AA
Telephone: 020 7983 44
Web: www.london.gov.uk

30 July 2018

Nicholas Pollard, CEO
Cory Riverside Energy
Belvedere, London
DA17 6JY
(Via email)

Dear Nicholas,

Proposed Cory Riverside Energy Park in Belvedere, with waste energy recovery incinerator

This is the response of the London Assembly Environment Committee to your consultation on the proposed Riverside Energy Park.¹ I must first thank you for Cory's assistance to the Committee's investigations of waste management strategy in London, as your staff have attended our meetings, provided written information, and shown committee members around Cory facilities.

However, the London Assembly Environment Committee is wholly unconvinced of the need for greater energy from waste (EfW) capacity at Belvedere. There are positive elements of the Energy Park proposal, but in its current form these are far smaller than the incineration element, which does not appear justified according to the evidence presented.

Waste management demand and capacity projections

According to the Mayor's Environment Strategy, as London reduces waste per person and increases the separation of dry recycling and food waste, its residual waste should plateau, even as the population increases and landfill is phased out. With EfW incinerators coming on stream at Edmonton and Beddington Lane, London is to have EfW incinerator capacity equal to this residual waste stream. The need for increased capacity will primarily be in recycling, and potentially in organic treatment.²

¹ It is the response of a majority of the committee. The GLA Conservatives and the UKIP Group dissent from its conclusions, for reasons noted below.

² From figures in the Evidence Base to the Mayor's Environment Strategy, London's expected waste management requirements in 2030 would be about 3.8 million tonnes of recycling (with existing and pipeline facilities about 1.5 million tonnes short of handling that), 0.9 million tonnes of organic treatment (with

Therefore, the anaerobic digestion (AD) element of the energy park proposal is a positive. Adding 40,000 tonnes waste handling capacity to London's AD infrastructure would make up some of the capacity gap expected if food waste is separated better but not reduced at source. The proposed 1.2 MW solar generation capacity would certainly be a useful contribution to London's zero-carbon energy supply, and the proposed battery storage capacity would also be an important part of smart and renewable energy infrastructure.

However, these elements are very small in comparison to the proposed waste incineration.³ We are therefore responding to this current proposal primarily as an EfW incinerator. Apart from landfill (and incineration without energy recovery, which is already near zero), EfW incineration is at the bottom of the hierarchy for London's waste management. Reasons to avoid incineration if possible include the loss of materials in the waste stream, and the air pollution produced.

Loss of materials and the circular economy

You state that the proposed incinerator will only burn non-recyclable waste. However, this relies on effective waste segregation which in practice has not been achieved. Based on this we do not accept this claim. London's residual waste stream currently contains a large proportion of material such as plastic, paper and card that could be recycled if separated and appropriately handled. To achieve the 90 per cent reduction in carbon emissions targeted by the Mayor and required by the UK's climate change commitments, London will need to reduce, reuse and recycle its waste materials, creating what is known as a circular economy. Burning waste to recover energy has some environmental benefits compared to landfill, but as it creates harmful substances such as ash and exhaust gas it is not preferable to recycling or anaerobic digestion, which more effectively uphold the principles of a circular economy.

In our recent report, *Wasting London's Future*, we set out recommendations for the Mayor to improve recycling, which included improving the recycling offer to flats and improving consistency across London. We are also considering further findings on how the government could work with supermarkets to increase recycling for plastic

Air pollution

Incineration also contributes to air pollution. In our report, we found that London's EfW incinerators emit over 2,000 tonnes of NO_x per year, 4 per cent of London's total. Many other pollutants, including chlorine, arsenic and mercury are also emitted from EfW facilities.

facilities about 0.1 million tonnes short) and 2.2 million tonnes of EfW (with facilities approximately equal to the requirement). If additional goals on food waste reduction are met, then the shortfall in recycling would be slightly less, and there would be approximately 0.2 million tonnes more capacity than required in each of organic treatment and EfW. The proposed Riverside Energy Park is not included in the EfW capacity pipeline in these figures and so would create around 0.6 to 0.7 million tonnes excess EfW capacity. London would only need this capacity if it fell far short of the recycling targets (and did not manage the shortfall by exporting waste outside its borders while the shortfall existed).

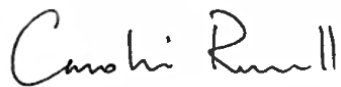
³ In terms of waste handling, the proposal is to take up to 655,000 tonnes of residual waste (for the incinerator) and up to 40,000 tonnes of food and organic waste (for AD). The incinerator would therefore represent about 94 per cent of the total waste capacity. In terms of power generation, the total capacity is proposed to be 96 MW. Of this, 1 MW would be AD and 1.2 MW solar, leaving approximately 94 MW for incineration, about 98 per cent of the total.

Energy generation

The energy generated by incineration is a benefit. However, the energy is not fully renewable. Only the organic component of the waste stream qualifies as renewable fuel. As more of this is separated and sent to AD, the overall fuel mix for incineration may become less renewable.⁴

In conclusion, we remain wholly unconvinced with the case for greater EfW incinerator capacity at Belvedere and instead wish to see a direction of travel towards the circular economy. Madrid recently committed to stop sending waste to incineration by 2025: London is not in a position to achieve this so soon, but should be heading in a similar direction. With the Mayor's strategy (and national policy) directed at increasing recycling and taking food waste out of the residual waste stream, these should take priority over building any additional incinerator capacity.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Russell". The signature is written in a cursive, slightly slanted style.

Caroline Russell, Chair of the Environment Committee

⁴ The GLA Conservative and UKIP Groups support energy from waste generation as a tool for delivering renewable energy to Londoners.