# gas pressure reduction station, Southall gasworks

in the London Borough of Ealing

planning application no. P/2009/0780-S

## Strategic planning application stage 1 referral (new powers)


## The proposal

Construction of a combined heat and power plant adjacent to the existing gas holder to generate electricity and heat for the gas pressure reduction station, the national grid and adjacent development.

## The applicant

The applicant is **Blue-NG**, and the architect is **Feilden Clegg Bradley**

## Strategic issues

The proposal proposes to generate electricity and heat through the combustion of bio-liquid, principally new and recycled vegetable oil, but with the potential for a range of fuels, including fuel from advanced waste treatment technologies. Electricity will be exported to the grid and/or private developments; heat will be used to keep gas temperatures stable as they undergo the pressure reduction required for London’s gas supply; heat will also be used to generate more electricity and for use in a future district heating scheme.

The scheme supports strategic policy on **renewable energy** generation and carbon dioxide reduction targets. It requires local control over the sourcing of fuel and air quality to ensure consistency with strategic **climate change** and **air quality** policies.

The scheme is within the boundary of the Southall gasworks planning application. On the basis of information submitted and assessed to date, the scheme supports the climate change objectives for the wider site. The architecture of the main building is supported, however, the **design** in terms of siting and landscaping potentially harms the adjacent proposed development. The scheme raises concerns about **inclusive design** and clarification is required on **transport**.

## Recommendation

That Ealing Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 57 of this report; but that the possible remedies set out in paragraph 59 of this report could address these deficiencies.
Context

1 On 24 April 2009 the Mayor of London received documents from Ealing Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 4 June 2009 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Category 1C of the Schedule to the Order 2008: “Development which comprises or includes the erection of a building of one or more of the following descriptions — (a) the building is more than 25 metres high and is adjacent to the River Thames; (b) the building is more than 150 metres high and is in the City of London; (c) the building is more than 30 metres high and is outside the City of London.”

3 Once Ealing Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 Southall gasworks is situated in west London close to Southall town centre, directly north of the mainline railway between London Paddington and the west of England, and south of the Grand Union canal. On the southern part of this site sit three gas holders and associated works. The remainder of the site is in temporary use as a car park for Heathrow Airport. There is currently a separate planning application being considered by Ealing and Hillingdon Councils for the comprehensive redevelopment of this site, including the retention of an existing gas holder and associated works (see case history below).

7 The proposed pressure reduction station development lies within the wider Southall gasworks site, and covers an area of 2.32 hectares in total, in two locations. The main development covers 1.66 hectares to the east of the existing main gas holder (which is to be retained within the wider masterplan development. This site is identified for an energy centre within the separate site-wide planning application. To the west of the gas holder, the applicant proposes a separate building housing further energy generation plant on a 0.66 hectare site.

Details of the proposal

8 The proposal site, along with the gas holder site, operates as a gas storage and gas pressure reduction station. Natural gas arrives here at high pressure at approximately 100 bar pressure. The pressure is reduced to approximately 1 bar to allow gas to be distributed to residences and commercial properties. During this process, the gas cools down (known as the Joule Thompson effect), which can lead to pipes freezing, liquid dropout and/or permafrost. In order to prevent this, gas boilers are used to produce heat to keep gas in the pipes at a stable temperature.
The primary purpose of this proposal is to continue to do this, but to reduce the carbon dioxide emissions associated with this heat generation. The following describes the proposal in terms of process, buildings and plant. Appendix 1 demonstrates the process.

**Process**

10 The primary purpose of this development is to provide heat to maintain stable gas temperatures to counter the Joule-Thomson effect described above.

11 The proposed development will replace the gas boilers and at the same time generate electricity to be exported to the grid or to adjacent future development, along with useful waste heat that can also be used within a district heating system.

12 The proposal works in several stages:

- The combined heat and power (CHP) plant will combust biofuels, currently proposed as rapeseed oil and recycled vegetable oil to generate renewable electricity (up to 13.5 megawatts).

- The waste heat from this process is put to two uses. Firstly, heat is used to ensure the gas temperature remains stable, as is required by National Grid, the gas transmission operator, within the gas transmission pipe. The heat energy applied to expand the gas will allow electricity to be generated through the use of a turbo expander which the applicant will place within the pipe. The total electricity generated will depend on the gas mass flow through the pipe (which fluctuates according to consumer demand) but on average will be able to generate up to 3.6 megawatts of electricity, up to potentially 6 megawatts at high gas flow. The electricity generated through this process of applying renewable heat to a turbo-expander in the gas pipeline has been deemed by Ofgem to be classified as renewable.

- Additional waste heat from the biofuel CHP engine is put through a separate generator that heats a liquid to generate electricity, known as an organic rankine cycle (ORC). This generates up to 1 megawatt of electricity and 3.5 megawatts of heat. In addition, a turbo generator in the exhaust stack of the CHP unit will allow an additional 0.5 megawatts of electricity to be generated. The applicant states that this ORC heat captured is of a sufficient temperature (90 degrees centigrade) to be for district heating, and can be piped directly to homes and adjacent commercial uses, for space heating and hot water if there is both the demand and infrastructure to do so.

13 Overall, it will be possible to generate on average 18.5 megawatts of renewable electricity. The high operational factor for this plant (95 per cent) will help generate up to 153 GWh (gigawatt hours) of electricity annually enough to power over 40,000 homes.

**Buildings**

14 The first stage of the process requires large electricity generation plant to be housed. The proposed building measures 82 x 43 metres. It has an irregular form with a height of 39 metres at the highest points of the roof. The building also contains a 65-metre high exhaust stack/chimney. The exhaust stack will be made of material that will allow it to use fuels produced from advanced waste management processes such as pyrolysis and gasification, ensuring it is future-proofed for alternative fuels supported by current strategic waste policy. The building will be clad in a grey milled aluminium cladding.
Figure 1 – image of the proposed development alongside existing turquoise gas holder (taken from plans submitted with the application)

15 Figure 1 shows the main building, with the fuel storage area and service room/pump station adjacent to the main building. To the right of the gas holder sits the turbo expander building along with a combination of existing and proposed pipe work.

16 The fuel for the first stage of the process is housed in a storage compound. The applicant has stated that the fuel storage tanks will be able to hold fuels produced from advanced waste management processes such as pyrolysis and gasification to future-proof for the potential for waste derived fuels to be used, as these technology options become available.

17 The equipment to maintain the gas temperature, and to house electricity generation from the second stage of the process is contained in a single building measuring 10 metres x 10 metres, 8 metres high, known as the turbo expander building. Heat is piped from the main building to the turbo expander building and is transferred via heat exchangers to the gas pipes to maintain the temperature of the gas.

**Equipment**

18 The liquid biofuel will be delivered by small tankers, as the principal access road to the site from Southall cannot currently accommodate full size tankers. It will be stored in four 100,000 litre storage tanks adjacent to the vehicular access along the southern boundary of the site. Figure 2 below shows the indicative internal view with the main turbine. The CHP unit chosen contains an engine that is suitable to use a range of fuels. This can include recycled vegetable oils and rape seed oil or gases produced from waste management facilities, namely biogas and synthetic gas. This is discussed in the climate change section of this report.
19 Heat is then pumped to the turbo expander building where heat exchangers are used to transfer heat to working fluid contained within the organic rankine cycle (ORC) element of the proposal, as outlined in the process section above. Waste heat from the ORC can then be directed to any adjacent development that contains the appropriate district heating infrastructure.

Case history

20 The wider Southall gasworks site, including the current site, was the subject of five separate planning applications in 2005, including an outline planning application for mixed use development including approximately 4500 homes, along with separate applications for access. These were subsequently withdrawn and a revised single application has been submitted to Ealing and Hillingdon Councils, and referred to the Mayor, for a mixed use development including up to 320,000 sq.m. of residential use (approximately 3,750 residential units) and substantial non-food and food retail, and other town centre type uses.

21 The wider Southall gasworks application includes the area of land identified in this application for the main turbine building and its proposed to be the energy centre for the entire scheme.

22 The wider application is still being considered by Ealing and Hillingdon Councils. The Mayor considered the scheme on 9 December 2008 and a copy of the report he considered (PDU/2310/01) is attached in Appendix 1.
Strategic planning issues and relevant policies and guidance

23 The relevant issues and corresponding policies are as follows:

- **Sustainable development**
  - London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG

- **Air quality**
  - London Plan; the Mayor’s Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23

- **Waste/minerals**
  - London Plan; the Municipal Waste Management Strategy; PPS10

- **Urban design**
  - London Plan; PPS1

- **Access**
  - London Plan; PPS1; Accessible London: Planning and Access for Disabled People: a good practice guide (ODPM)

- **Transport**
  - London Plan; the Mayor’s Transport Strategy; PPG13

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2004 Ealing Unitary Development Plan, and the London Plan (Consolidated with Alterations since 2004).

18 The Ealing Core Strategy, which is at Issues and Options stage, is a relevant material consideration. The site is within the Heathrow Opportunity Area in the London Plan which broadly seeks the development of homes and jobs within the area.

**Energy**

The technology

24 The London Plan requires all development to make the fullest contribution to the mitigation of and adaptation to climate change. The existing gas pressure reduction process requires energy to keep the gas at a constant temperature through the expansion process from high pressure to lower pressure. Gas boilers are currently used to generate heat and consume around 1.6 megawatts of energy annually to do this. The applicant states that replacement of these boilers with renewable heat generated through a biofuel CHP plant would reduce carbon dioxide emissions by approximately 941 tonnes per annum, equivalent to the gas requirement of 100 houses.

25 The proposed development would allow the existing gas expansion process to continue as well as generation an average of 18.5 megawatts of renewable electricity and the potential to provide district heating to residential and commercial developments proposed as part of the planning application for the Southall gasworks site. The process is described in the description of the development section of this report.

26 The London Plan sets a target to achieve a total installed renewable energy capacity of 8 biomass fuelled combined heat and power plants by 2010 and 24 by 2020 with a capacity of 24 megawatts and 72 megawatts respectively. This proposal, based around the use of a 14 megawatt combined heat and power plant, will significantly contribute to the achievement of these targets, generating up to 153 gigawatt hours of renewable electricity - over 20% of the renewable electricity target set in the Mayor’s 2004 Energy Strategy - and potentially up to half the Energy Strategy’s renewable heat target for London.
The fuel

27 The applicant states that the CHP engine shall primarily be run on bio-liquid known as straight vegetable oil (SVO). In addition, diesel will be used during the start-up and shut-down procedures for the engine. SVO can include oil from a range of crops and can include recycled vegetable oil. Using these fuels, the scheme would be eligible for Renewable Obligations Certificates (ROCs) which are a source of income under the 2002 Renewables Obligation Order. The proposed engine has, however, been selected for its flexibility and can use a range of renewable fuels as set out in paragraph 18. Therefore, although assumptions can be made about the type and quality of the fuels proposed, these will be subject to detailed procurement and change in the future. The Renewables Obligation specifically supports the use of UK based energy crop fuel being used and awards it a premium. The applicant has stated that it will procure primarily from the UK.

28 The London Plan requires development to make the fullest contribution to the mitigation of and adaptation to climate change (policy 4A.1). In this context, ensuring a suitable, sustainable fuel is a relevant planning consideration. Appendix 2 sets out the applicant’s stated commitments to biomass fuel procurement. In summary, these are to develop an ethical strategy for procurement, source demonstrably sustainable biomass, taking account of lifecycle emissions and information from external bodies, complying with all applicable legislation, utilising land historically used for arable crops, and only using fully traceable supply chains that are independently audited. These tests are appropriate and reasonable for the purposes of assessing the scheme against London Plan policy 4A.1.

29 There are other non-planning mechanisms that can ensure the sustainable sourcing of bio-liquids. For example, in order to qualify for ROCs, the fuel needs to comply with sustainability criteria. However, given that this is a development of strategic significance and one that is applicable to other gas pressure reduction systems in London, it is in the interests of good strategic planning to ensure that the applicant’s commitments set out above and in Appendix 2 are secured. The section 106 agreement is recommended as a mechanism to ensure that fuels to be procured demonstrably meet the tests set out in the applicant’s procurement strategy.

30 The applicant has stated that the manufacturer of the CHP engine to be used (a 13.47 megawatt MAN compression ignition engine) has provided a warranty for the fuel proposed. Approximately 20,000 tonnes of liquid biofuel are required annually by the CHP which, on average, equates to 2.2 lorry loads of fuel delivery per day to site.

Decentralised energy and future-proofing

31 The applicant states that it will be possible to utilise the waste heat from the ORC stage of the electricity generating process within a district heating network with the potential to serve adjacent future developments. It also states that the engine used to generate electricity will be able to use biogas generated from advanced waste treatment processes such as anaerobic digestion, and synthetic gas (known as syngas) produced from advanced waste treatment processes such as gasification.

32 The London Plan places significant priority on the development of energy technologies and infrastructure that can provide district heating, and also promotes the development of advanced waste treatment processes. It also requires new development to prioritise connection to district heating networks through policy 4A.6. The scheme also has the potential to direct the renewable

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1 Under this Order, electricity generators are required to produce renewable electricity, or pay into a fund. If they produce renewable electricity they receive a Renewable Obligation Certificate (ROC) and each ROC can be exchanged for money from the fund.
electricity generated to nearby developments. The provision of both renewable heat and renewable electricity will potentially allow the development of zero carbon (Code for Sustainable Homes Level 6) buildings.

33 This development is primarily an electricity generation plant that makes as much use of the waste heat as possible to support the delivery of natural gas infrastructure. However, the process results in sufficient spare heat to supply up to 3.5 megawatts of renewable heat for district heating purposes, which should be sufficient to provide district heating to the proposed wider development. The applicant for the wider Southall gasworks has submitted updated information to the GLA that demonstrates it will have suitable infrastructure to use this heat.

34 To ensure that it is able to deliver district heating, the applicant should provide additional information indicating that the heat being made available is of sufficient quantity and quality (i.e. temperature) to provide district heating capacity to the nearby planned developments.

35 The London Plan (policy 4A.10) strongly encourages development to avoid excessive heat generation, which can contribute to the urban heat island effect. The Council should ensure that the CHP proposed will qualify under the Government’s CHP Quality Assurance (CHPQA) programme, which sets a level of efficiency that requires substantive use of waste heat from electricity generation to qualify. This should be done through the following planning condition, to ensure that there scheme does not result in the excessive discharge of heat into the local environment:

"Prior to the operation of the development the applicant shall submit documentation to demonstrate that the scheme will qualify under the Government’s CHP Quality Assurance (CHPQA) programme. Reason: To ensure consistency with London Plan policy 4A.10 and to minimise the development’s contribution to the urban heat island."

Overall

36 The proposed development will result in significant new renewable energy capacity for London. It supports strategic targets for carbon dioxide emissions reductions, displacing emissions associated with grid electricity and natural gas. It is a highly efficient system that makes the most out of the fuel put in. The proposal raises wider sustainability issues around the procurement and quality of the fuel used and to this end Ealing Council should ensure a level of control through a section 106 agreement.

Air quality

37 The London Plan aims to reduce pollutant emissions and public expose to pollution through a range of measures linked to the Mayor’s Air Quality strategy (policy 4A.19). In particular it aims to ensure that formal air quality assessments are undertaken where appropriate for planning applications. GLA officers are working with Ealing Council air quality officers on this application.

38 An air quality impact assessment has been undertaken for this application and the approach taken is suitable. The assessment covers the expected impact associated with the construction of the site, as well as the operational traffic impacts and the emissions from the proposed plant. Suitable extensive modelling has been undertaken to identify a location for the stack that has the least impact on local air quality and a range of meteorological data and conservative assumptions were used regarding the operation of the plant on site. The assessment demonstrates that there will be an impact on existing residential areas around Southall station. However, modelling demonstrates that the local road traffic remains the dominant source of air pollution in the local vicinity.
Although the planning statement indicates that the proposal will use vegetable oils, the assessment is lacking information on the fuel types assumed to be used within the assessment. The applicant should provide clarification on this.

The combustion of the proposed fuel types, if not mitigated, would most likely be detrimental to local air quality, particularly in terms of nitrogen dioxide. The plant will therefore be fitted with selective catalytic reduction (SCR) abatement technology to mitigate any impact and the air quality assessment was carried out on this basis. The proposed technology is stated as being able to ensure a certain level of emissions will not be exceeded regardless of the fuel type or quality. This technology is essential to the acceptability of the proposal and as such should be secured by planning condition.

In terms of designing the scheme to minimise emissions, the location of the main building and the height of the exhaust chimney, at 65 metres, have been determined by the potential air quality impact. The applicant is proposing a single large generator within the building, rather than two smaller generators as originally intended. Owing to this change, the scheme exceeds thresholds set under the Pollution Prevention and Control Regulations. This means Ealing Council will regulate the process and a permit application has been sent to the applicant. Depending on the risk status the installation will be classified as, the permit can contain a number of conditions that the operator will have to adhere to, for example fuel type and emission standards, maintenance and operation schedules. These powers are significant and will necessitate an ongoing relationship between the applicant and the Council.

In addition to the above, the assessment includes a list of construction mitigation measures that should be applied to minimise dust emissions. It is required that the applicant classifies the risk of the development site (according to the London Councils and GLA Best Practice Guidance ‘Control of dust and emissions from construction and demolition’) and the construction mitigation measures, appropriate to the risk of the site should be included within a planning condition.

There will be a minor additional local impact on air quality in specific areas. Ealing Council is able to control this using its planning and pollution prevention and control powers. The scheme does not, therefore, raise strategic air quality issues, provided that the main abatement measures are secured.

Waste

The London Plan (policy 4A.21) promotes the development of advanced conversion technologies for waste, where technologies are able to treat waste and from which gas is a by-product. This may be in the form of synthetic gas, from processes such as gasification, or bio gas from processes such as anaerobic digestion. The applicant states that this proposal will be able to use such gases in future when they become available. There is the potential, therefore, for this scheme to support the development of London’s waste and energy infrastructure jointly, however, the applicant should provide further demonstration that this technology is able to use such gases to be consistent with the London Plan.

Design

The main design issues with this scheme are the relationship between this proposal and the proposed development of the wider gas works site, including the location, height, siting, quality of design and landscaping.

The proposed height of the building exceeds the parameters of the proposed masterplan for the wider Southall gasworks site. The development cannot be located within the curtilage of
the gasworks site, as originally intended. Air quality modelling demonstrated that the prevailing wind took the majority of the exhaust into the existing gas holder where particles would then drop and disperse at ground level. The applicant originally considered the use of two smaller engines; however, it has moved to a single larger engine, which requires a taller building.

47 The single larger engine does offer benefits in terms of more efficient generation of energy and in a reduction in absolute particulate emissions. On those grounds there is merit in allowing the height to be exceeded, subject to the acceptability of the design impact on the proposed neighbouring blocks.

48 In terms of building form and material, the proposal has the potential to be striking. The irregular form will create interest from different angles especially in the way light will reflect off the aluminium cladding. The applicant has supplied examples of this material in use, and the Council should ensure that the quality is maintained through approval of details. The bold form and material are appropriate for the use, representing innovative technology that will be a key part of the infrastructure for this area of London. However, that does not negate or override the need to address the immediate relationship with the planned buildings for the wider Southall gasworks site.

Figure 3 - Plan showing relationship to Southall gasworks outline planning application

Figure 3 above shows the proposed building plan and relationship to blocks in the wider masterplan. Considering all the proposed buildings, the main CHP building is situated closest to, and is likely to have the most significant impact upon other uses within the wider masterplan. The blocks that it is closest to are identified for car park/office (block A) and retail/residential (blocks B and C). Block A is approximately 20 metres at the closest points, and block B is approximately 32 metres. The location of the CHP building has been determined by the need to minimise air quality
impacts. If the building were to be located to the west of the gas holder within the area designated in the masterplan for the gasworks, the existing gas holder would act as an obstruction to any plumes from the stack. Accepting this, the strategic design consideration is whether the relationship between the building, in its proposed location, and the masterplan is suitable.

50 The siting of the building and the landscaping response are not currently satisfactory. The CHP building is aligned with block A, however, viewing from blocks B and C, the building will appear uncomfortably close to the proposed residential blocks. The building north and eastern edges are up against the site boundary, separated from the road by a small strip of land and a boundary fence. In contrast, the greater distance and open area in front of the more substantial existing gas holder gives the impression of a respectable distance and separate activity from the residential/commercial uses. The proposed landscaping appears simply to deal with left over areas of land, following the siting of the CHP building, rather than being considered as an integral part of the scheme and masterplan area. It’s purpose is therefore diminished.

51 The applicant should consider setting back the building, closer to The Straight, the road that runs along the southern boundary, and reconsidering the potential of integrating the landscaping and security fence on the northern boundary with the wider landscape strategy of the gasworks masterplan, creating a more acceptable visual link with the proposed uses for the wider site. If there is a genuine need to site the building in the current location, this should be clearly demonstrated.

Inclusive design

52 The London Plan requires the highest standard of inclusive design in new development. The proposed application will have limited public access, however it will have a visitors’ centre, which is intended to be by appointment only. The internal layout covers up to three floors. Upon submission, the visitors’ centre, indicated on the first floor was not accessible by lift and the applicant did not submit an access statement that was sufficient to explain this lack of inclusive design. GLA officers have raised this issue with the applicant. The applicant has revised the scheme to include a lift and responded to say that at the detailed stage the design will be made compliant with the Disability and Discrimination Act. This response is not sufficient to address policy 4B.5 of the London Plan which requires the highest standards and the applicant should demonstrate how this issue will be properly addressed.

Transport

53 The scheme does not raise any strategic transport issues and is not anticipated to have an impact on the Transport for London Road Network. The applicant was asked to investigate the potential to transport fuel by canal or rail. It argues that there are no suitable small scale barges available to transport liquid fuel nor is there the infrastructure in place to allow easy transfer to the site, other than road vehicles. However, the potential for rail use has not been addressed and should be to ensure consistency with policy 3C.25 on sustainable freight movement.

Local planning authority’s position

54 Ealing Council officers are currently considering their recommendation.

Legal considerations

55 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his
reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

56 There are no financial considerations at this stage.

Conclusion

57 London Plan policies on climate change, air quality, waste, design and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Climate change**: The development will reduce the carbon dioxide emissions associated with the maintenance of natural gas supplies through the Southall gas pressure reduction station. It will also generate renewable electricity in London, contributing towards strategic carbon dioxide reduction and energy generation targets. It has the potential to provide heat to future development planned for the Southall gasworks site supporting London Plan policies on decentralised energy. The applicant’s proposed procurement policy is acceptable subject to a suitable section 106 agreement. The scheme is consistent with policies 4A.1, 4A.2 and 4A.6 of the London Plan.

- **Air quality**: The applicant has undertaken an air quality assessment that demonstrates the main local impact will be to existing residential developments and the area around Southall station. The Council is able to control this impact through its own powers. The proposed mitigation measures should, however, be secured. Information is required in terms of assumptions about the fuel sources. The scheme is consistent with Policy 4A.19 subject to suitable planning conditions.

- **Waste**: The scheme has the potential to support London Plan policy on advanced waste management technologies by providing a demand for fuels they created. The scheme is designed to use these and is consistent with policy 4A.21.

- **Design**: The design of the main building is supported and is appropriate for the proposed use. It currently has the potential to harm the wider masterplan unless a clearer relationship between proposed residential and retail blocks and the building is established. There is the scope for public access through a visitor’s gallery however, the scheme does not yet demonstrate the highest standards of inclusive access. The scheme is not consistent with policies 4B.1 and 4B.5 of the London Plan.

- **Transport**: Although the scheme does not raise any strategic transport issues, the applicant should demonstrate whether it is possible to use rail infrastructure to deliver fuel. This is to ensure consistency with policy 3C.25 on sustainable freight movement.

58 On balance, the application complies generally with the London Plan, but it fails in certain specific regards.
The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming fully compliant with the London Plan:

- **Climate change and air quality**: Provision of further information as set out in this report.
- **Design**: Revisions as set out in this report, to ensure that the proposed main building forms a complementary and integral part of the wider Southall gasworks masterplan.
- **Inclusive design**: Revision to ensure that, in particular the visitors’ centre is accessible to all and meets the highest standards of inclusive design.
- **Transport**: Demonstration on whether the scheme is able to bring in fuel by rail.

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APPENDIX 2 – BLUE NG proposed commitments for the sustainable procurement of fuel

Taken from Planning Statement submitted with the planning application dated May 2009.

“Blue-NG is committed to:

- Developing an ethical strategy for biomass procurement as a key part of its overall business strategy that would be applied to all its purchasing activity. This would embrace people, communities and supply chain practices whether involved in the growing, processing or transportation of the biomass to ensure that the goals and aims of the overall business are not jeopardised or compromised.

- Sourcing biomass that is demonstrably sustainable and which would provide significant CO2 lifecycle savings as a replacement for the fossil fuels used in power generation. In this respect, sustainability criteria would be applied using information from external bodies such as NGOs and Government agencies.

- Adopting and complying with all applicable legislation and programmes for sustainable crop reduction, such as those which are being developed in the UK by the Assured Combinable Crops Scheme (ACCS) and Linking Environment and Farming (LEAF).

- Only utilising land that has been historically cultivated for arable crops and is environmentally compatible. This means production that would minimise damage to the environment through soil erosion, deforestation or pollution and aids biodiversity. This would be achieved by participation and use of the various crop production programmes, as well as through independent verification.

- Only using fully traceable supply chains that are independently audited.”