

Boris Johnson
Mayor of London
(Replacement London Plan)
FREEPOST 15799
GLA City Hall
Post point 19B
The Queen's Walk
London SE1 2BR

8th January 2010

Dear Mayor Johnson,

Public consultation on the Draft replacement London Plan – Additional comment regarding paragraph 5.73

Thank you for providing us with the opportunity to respond to the consultation on the above. The North London Waste Authority has already submitted a response to the consultation in December 2009, but would additionally like to provide this further clarification and additional comment in relation to paragraph 5.73 of the consultation draft replacement plan.

In paragraph 2.5 of our already submitted response from Cllr. Clyde Loakes we note that:

“The change within the consultation draft London Plan for SRF production within London to be counted as waste being managed within London, is however a potentially very beneficial change for the Authority because it would assist the area in meeting self sufficiency targets and accordingly this change is supported.”

We wish to reiterate the above point and additionally comment as follows:

“The change within the consultation draft London Plan for SRF production within London to be counted as waste being managed within London is, a potentially very beneficial change for the Authority because it would assist the area in meeting self sufficiency.”

However, the Authority is concerned about the proviso which suggests that only SRF that is a ‘biomass fuel’ as defined in the Renewables Obligation Order (ROO) will be considered.

Ofgem, the regulatory body of the ROO has deemed SRF as 50% biomass content, which on its own, does not meet the definition of biomass fuel. Biomass fuel as defined in the ROO is one which has 90% biomass content. Even if the biomass content of SRF is greater than 50% and through production, a biomass content of 90% is achieved, the SRF will still be deemed at 50% unless stringent tests are carried out to prove otherwise. These testing procedures are expensive and coupled with the additional cost of production that may be required to achieve an SRF biomass content of 90% means value for money is unlikely.

The Authority is seeking to produce an SRF with a minimum biomass content of 50%. This coupled with good quality CHP means that the Authority should achieve ROCs with conventional technology and double the amount with advanced technology

The Authority would therefore like the London Plan to recognise that the 50% biomass within SRF is deemed as renewable and will achieve ROCs on the renewable portion".

I would like to reiterate again that we welcome the revision to the London Plan and in particular the increased focus upon climate change that is included within the draft Plan. We would also be keen to give oral evidence at the forthcoming Examination in Public on the revised Plan.

If you require clarification on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Lappage', written in a cursive style.

Andrew Lappage
Head of Waste Strategy and Contracts