

Riverside Energy Park

Consultation Report Appendices

APPENDIX:

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PLANNING INSPECTORATE REFERENCE NUMBER:

EN010093

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NON-STATUTORY ENGAGEMENT (AUGUST 2018 - OCTOBER 2018)

November 2018 | Revision 0 | APFP Regulation 5(2)(q)

Planning Act 2008 | Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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**Appendix L.1 Minutes of Project Update Meeting
with Port of London Authority
(10.08.2018)**

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Project: Riverside Energy Park (REP)
Meeting Regarding: River Works Licence Requirements
Attendees: Michael Atkins (PLA), Lucy Owen (PLA), Carrie Allen (CRE), Andy Pike (CRE), Devon Christensen (CRE)
Meeting Date: 10 August 2018
Location: London Riverside House

Discussion	Action
<p>Riverside Energy Park (REP) Project Update:</p> <p>DC provided an update on Navigational Risk Assessment (NRA) progress noting that the draft outputs are expected late September and will be provided to the PLA for review.</p> <p>DC acknowledged receipt of the PLA response to the PEIR and noted that each matter raised will be considered and addressed in the Consultation Report and Environmental Statement supporting the REP application. Cory will provide an update on assessment progress at the next meeting anticipated for early October. The application is on track for submission late 2018.</p> <p>CA provided an outline of Cory's existing River Works Licences (RWLs) and Mooring Licences along the River Thames noting a combined total of approximately 26. As the licences are under Riverside Resource Recovery Limited (RRRL), Riverside (Thames) Limited (RTL) or Cory Environmental Limited (CEL), they cannot be utilised for the proposed REP operations as intended. Therefore, moving forward, CRE are interested in amending or replacing the existing licences to allocate joint and several use by two or more Cory Group companies.</p> <p>MA and LO agreed that a joint and several approach presented a sensible way forward, however, noted that the PLA's position would require legal input. MA flagged that matters of assignability and the use of correct and relevant company names were important considerations. CA agreed to provide an outline of Cory's preferred approach to River Works Licencing for legal review. MA and LO suggested a response from the PLA would be forthcoming in following weeks.</p> <p>It was also noted that the review of Cory RWLs may provide opportunity for administrative improvements. CA highlighted potential for updating, replacement or consolidation of existing, outdated licences. It was therefore proposed that two workstreams were progressed in parallel, including:</p> <ul style="list-style-type: none">- holistic review of CRE permits over following months; and- agreement on the River Works Licencing requirements necessary for REP in imminent weeks.	<p>DC</p> <p>CA</p>

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Discussion	Action
AP noted that the latter may be best positioned in the Statement of Common Ground. DC suggested Cory provide draft wording following confirmation from the legal team.	DC
Regarding the holistic review of CRE licences, CA will send a spreadsheet of the licences that CRE hold and a map of their location. MA and LO offered to review the accuracy of the spreadsheet and advise on the potential for global licencing arrangements.	CA MA
Next Steps- Progress RWL arrangements via email. DC to organise a meeting in late early October to discuss NRA outputs and ES assessment.	DC

**Appendix L.2 Minutes of Project Update Meeting
with London Borough of Bexley
(28.08.2018)**

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Meeting Title: Riverside Energy Park – Update Meeting with London Borough of Bexley
Required Invitees: Richard Wilkinson (Cory), Devon Christensen (Cory), Sarah Chandler (PBA), Robert Lancaster (LBB), Claire Brew (LBB)
Date of Meeting: 28th August 2018
Location: Bexleyheath, Kent
Job Number: 42166

Item	Subject	Actions
1.	<p><u>The Riverside Energy Park (REP) Project Update</u></p> <p>RW provided an update on the project and highlighted that Cory are still on track with the programme as previously outlined, and that they are aiming to submit in Q4 of 2018.</p> <p>RW explained that members had been invited to the Riverside Resource Recovery Facility for a facility tour and a presentation on the proposed development on 26th August 2018.</p> <p>RL and RW noted that Cory are also presenting on 16th October 2018 at the London Borough of Bexley (LBB) Places Overview and Scrutiny Committee.</p>	<p>RW to issue presentation for information ahead of committee date</p>
2.	<p><u>Consultation update</u></p> <p>SC provided an overview and update on the consultation process to date. SC/RW noted that the level on engagement at the non-statutory and statutory public exhibitions had been of good quality and helpful to the project team. It was noted that the feedback received appeared to be well informed.</p> <p>SC highlighted the key topics that had been raised through the non-statutory public exhibitions, and explained that those topics had been addressed specifically in additional exhibitions boards for the statutory public exhibitions which were held in July. SC explained that the responses were currently being reviewed, and that in parallel Cory were undertaking consultation/engagement on some minor refinements to the Indicative Application Boundary and the Supplementary in to the PEIR (SIP) Report which was issued on 31st July.</p> <p>SC noted the statutory consultation responses received from prescribed bodies. RL raised that LBB had seen the GLA response and queried some of the points raised within it.</p> <p>RW explained that CRE/PBA were preparing a response to the GLA's comments and had a meeting schedule for September to discuss these points further. RL noted that it would be useful</p>	<p>CB to issue any comments on the SIP report by 14th September</p> <p>CRE to forward response to</p>



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	to understand CRE's position on some of the points raised, in particular, Air Quality, relationship with the waste hierarchy, and matters raised regarding CHP infrastructure. RW agreed to share the CRE response to GLA comments with LBB and keep them up to date with progress on discussions with the GLA.	GLA comments [RW sent on 6 th Sept 2018]
3.	<p><u>DCO Planning Process</u></p> <p>RL asked about the DCO process now statutory consultation has been undertaken and timing of Local Impact Report and Written Representation.</p> <p>SC explained the following:</p> <ul style="list-style-type: none"> • The Planning Inspectorate will write to LBB seeking an adequacy of consultation response once the application has been submitted • Further consultation will be undertaken on the accepted application under section 56 of the Planning Act 2008, LBB's response to this would be submitted to PINS as a relevant representation (RRep) • LBB can later expand upon comments made in their RRep in a Written Representation to be submitted to an early examination deadline • A Local Impact Report will be required to be submitted to an early examination deadline 	SC to issue example Rule 8 letter to provide idea of examination timescales
4.	<p><u>Statement of Common Ground (SoCG)</u></p> <p>All discussed timing of working towards a SoCG and agreed it would be useful to commence drafting soon. SC explained that the SoCG would cover aspects of the EIA and wider application including matters agreed regarding the draft DCO. RL asked whether any s106 agreement would fit in. RW/SC explained that all powers and Requirements would be secured in the DCO itself rather than being in a s106, the SoCG would then set out matters agreed on the project and application. RL raised that any socioeconomic commitments may need to be captured in a s106, RW agreed to take away and confirm.</p> <p><u>Draft Development Consent Order (DCO)</u></p> <p>CB asked what consents will be included within the DCO, SC explained that the DCO will include a number of powers and consents and, where applicable, will also disapply other legislation. SC highlighted that other consents and licenses would be identified in the application which are not covered by the DCO e.g. the Environmental Permit.</p> <p>RL asked about PRoW closures, RW explained that PRoW closures would be temporary only and SC explained that these would be identified in an Access and Rights of Way Plan</p>	<p>PBA to issue first draft SoCG</p> <p>PBA/CRE to confirm whether s106 would be needed</p> <p>PBA to confirm the consents included within the DCO and those which will be dealt with separately</p>

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	<p>submitted with the DCO application and listed in the relevant schedule of the draft DCO.</p> <p>CB highlighted that it would be useful to start looking at the Draft DCO and proposed Requirements. All agreed to pick up in a follow up meeting.</p>	<p>PBA to schedule meeting to discuss draft DCO</p>
5.	<p><u>EIA and section 42 response</u></p> <p>SC/CB/DC discussed the comments made in the LBB section 42 consultation response as follows:</p> <ul style="list-style-type: none"> • Transport – SC noted the comments and highlighted that LBB officers had been engaged with on the Transport Assessment Scoping and that the comments would be picked up by the transport team with relevant officers. • Air Quality – comments noted • Noise and vibration – comments noted • Townscape and visual – SC confirmed that the two viewpoints which could previously not be accessed due to a footpath closure would be included within the ES; also that wireframe photomontages were being completed to support the Townscape and Visual Impact Assessment (TVIA) and would be submitted with the Application • Historic environment – SC noted as per email on 16/08/2018 that the comments regarding historic environment appeared to be in reference to the Riverside Energy Park Scoping Report rather than the Preliminary Environmental Information (PEIR). CB agreed to follow up and obtain further comments from the relevant officer • Terrestrial biodiversity – DC/SC queried the comments and highlighted that the need for bat and fish surveys had been scoped out, and that the scope of ecological surveys had been discussed previously with LBB officers. SC suggested these points are re-confirmed SC also highlighted the previous note issued relating to removal of river works from the scope of the assessment. SC agreed to re-issue for information • Hydrology, Flood Risk and Water Resources – comments noted, SC highlighted that LBB had responded to provide comments on the drainage strategy and confirm they are in favour of the strategy • Ground Conditions – comments noted • Socio-economics – comments noted • Cumulative Effects – SC confirmed that the list of committed developments would be sent to LBB for review imminently 	<p>PBA transport consultants to discuss comments with LBB officers</p> <p>CB to obtain comments on historic environment chapter of PEIR</p> <p>PBA to re-confirm scope of surveys required RE bats and fish [emails sent to John Luckhurst 17/08/2018 and 30/08/2018]</p> <p>PBA to re-issue removal of river works note</p> <p>PBA to issue list of committed developments for review [complete]</p>
6.	<p><u>Next Steps</u></p>	

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	All agreed a meeting to discuss the DCO in greater detail, especially with respect to the proposed Requirements would be useful. Actions were agreed and recorded.	PBA to arrange next meeting for early October
7.	<u>AOB</u> No further business raised.	

**Appendix L.3 Minutes of Project Update Meeting
with Greater London Authority
(11.09.2018)**

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Meeting Title: Riverside Energy Park

Attendees: Natalie Maletas (PBA (NM)), Kirsten Berry (PBA (KB)), Graham Harker (PBA (GH)), Richard Wilkinson (Cory (RW)), Stephen Othen (Fichtner (SO)), Doug Simpson (GLA (DS)), Peter North (GLA (PN)), Stephen Inch (GLA (SI)), Patrick Feehily (GLA (PF)), Vanessa Harrison (GLA (VH))

Date of Meeting: 11th September 2018

Item	Subject	Actions
1.	<p>Introductions were made around the table and RW introduced REP with its particular elements of Anaerobic Digestion, Energy Recovery Facility (ERF), Solar Panels and battery storage.</p>	
2.	<p>Waste</p> <ul style="list-style-type: none"> - Waste Capacity Note <p>GLA (DS) recognised arisings and recycling percentages in the Waste Capacity Technical Note as originating from adopted and draft London Plans. GLA (DS) added that they use different assumptions for 'what waste is recyclable and recoverable' within the London Environment Strategy (LES) calculations. These assumptions are not explicit within the LES and its appendix and therefore DS will share the GLA modelling with Cory.</p> <p>GLA agreed the existing capacity figures within the Waste Capacity Technical Note including the Severnside Energy Recovery Facility (ERF) located outside of London, in Bristol. GLA confirmed they no longer rely on the capacity at Lakeside ERF, recognising the Heathrow decision.</p> <ul style="list-style-type: none"> - Policy <p>Discussion was held re national policy and KB advised the GLA the NPPW states there is no requirement for a quantitative or market need to be demonstrated, and that test in the NPS is that the waste combustion generating station is of an appropriate type and scale so as not to prejudice the achievement of local or national waste management targets.</p> <p>GLA recognised London Plans as land use documents that need to be deliverable and justified, whereas the LES is deliberately more aspirational and daring. GLA highlighted it has a different purpose and isn't subject to the same limitations.</p> <p>GLA acknowledged there is only funding in place to 2020 and modelling demonstrates the ability for LACW to reach 42% recycling; the GLA is seeking intervention from central government to further drive waste reduction and increased recycling in London to meet the targets set out in the London Plans and the LES. There are currently no plans from central government to do this beyond that already committed.</p>	<p>DS</p>



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	<p>GLA confirmed the LES contains all the current measures available to deliver policy of the LES, and London Plans.</p> <ul style="list-style-type: none"> - Source of Waste <p>GLA enquired where the waste is coming from. Cory/ PBA explained that REP is a wholly merchant facility, commercially funded by Cory. It is not predicated on local authority waste contracts in or outside of London.</p> <p>GLA asked for other UK examples of wholly merchant ERF. Cory provided the examples of WTI's facilities at Ferrybridge and Kemsley (K3) and Covanta's plant in Bedfordshire.</p> <p>Cory explained the expectation of demand driven by C&I waste within London. If proved wrong, then would retain flexibility and take waste from beyond London, using river transport. This aligns both with enabling London to meet self-sufficiency policy (noting the amount of London's waste currently exported) and the proximity principle/nearest appropriate installation.</p> <p>Cory explained that the majority of waste is expected to be delivered to REP by river from their 4 river based waste transfer stations (WTS). Residual waste is already being delivered to these WTS and it should be acknowledged that they will operate under their existing planning permissions and environmental permits.</p> <ul style="list-style-type: none"> - The Principle of Energy from Waste <p>GLA believes ERF prejudice recycling but the only reasoning given was of one Borough (Barnet) intending to stop food waste collection, and a general concern in terms of long term LACW contracts which set a guaranteed minimum tonnage level.</p> <p>Cory reiterated that the ERF within REP is intended to replace landfill and move waste up the waste hierarchy. REP will manage residual waste only and is not reliant on a long term local authority waste contract (unlike North London Heat and Power/ Beddington). Cory reminded the GLA that any reduction in council offered waste services will be driven by the austerity cuts to council funding, and the subsequent impact on services is not within Cory's control.</p>	
3.	<p>Energy</p> <ul style="list-style-type: none"> - CIF <p>GLA (DS) agreed that the Carbon Intensity Floor (CIF) is a threshold which simply needs to be met. SO stated that it could be met by improving the power efficiency, heat efficiency or both and SO highlighted that the draft London Plan suggests that it might be achievable with high electrical efficiency, such as using gas engines. GLA (DS) agreed but said that he would not expect an ERF plant to achieve the threshold on power only. He also commented that the waste composition would affect the CIF value.</p>	

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	<p>GLA (DS) agreed that the ready reckoner spreadsheet could be used to determine the CIF. We would also be free to use a different method if we wanted.</p> <p>GLA (DS) mentioned that Cory also need to consider the emission performance standard.</p> <p>GLA (DS) agreed to confirm the basis of the heat and power efficiency inputs in the CIF spreadsheet (Net or Gross CV).</p> <p>GLA (PN) agreed that the CIF threshold does not need to met on day one (although emphasised that this was their preference.)</p> <p style="text-align: center;">- Exploring Heat Opportunities</p> <p>GLA (PN) confirmed that there would need to be demonstrable steps taken to show that heat export would happen. These would include installing the necessary equipment on site, carrying out studies, having an Energy Masterplan, engaging with the local authority and setting up working groups. Beddington was suggested as an exemplar.</p> <p>GLA (PN) confirmed that the GLA funded studies exploring heat export from the RRRF and the Bexley Energy Master Plan. A CHP Working Group had recently been set up by LBB with representation from key stakeholders including GLA, RBG, and Peabody Trust.</p>	DS
	<p>Air Quality</p> <p>GLA (SI) confirmed the draft London Plan policy on gas engine CHP applies regardless of the source of the fuel.</p> <p>GLA (SI) confirmed they will use the IAQM criteria for the assessment of significance of impacts on pollutant concentrations.</p> <p>GH confirmed Cory has assessed the impact of either 100% of waste delivery by road or 100% of waste delivery by barge. GLA (SI) confirmed they were aware of the PLA Air Quality Strategy. GH highlighted that this Strategy demonstrated that barge traffic was much better than HGV traffic.</p> <p>GH confirmed we have not calculated the emissions that would result from transporting the waste out of London to landfill to try and offset the emissions from the ERF.</p> <p>GLA (SI) confirmed that the GLA's air quality positive policy doesn't apply.</p> <p>GH explained to the GLA that BAT emission limits are the maximum allowable during operation and would be enshrined in environmental permitting and Cory has modelled at these emission limits. However, GH highlighted that in reality, in order to ensure that the facility doesn't breach the limits, the actual emissions will be below the limits to provide operational headroom.</p>	

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	<p>AOB</p> <p>Other Topics</p> <p>VH to come back to Cory with comments on responses provided by Flood Risk, Socio Economic topic etc.</p> <p>VH confirmed that the GLA's concern over Metropolitan Open Land (MOL) only relate to the REP elements within the designation (i.e. cable route).</p> <p>London Plan Examination</p> <p>VH to confirm timetable of London Plan examination.</p>	<p>VH</p> <p>VH</p> <p>VH</p>
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**Appendix L.4 Minutes of Project Update Meeting
with the Planning Inspectorate
(27.09.2018)**



Meeting note

File reference	EN010093 - Riverside Energy Park
Status	Final
Author	Ewa Sherman
Date	2 November 2017
Meeting with	Cory Riverside Energy
Venue	Temple Quay House, Bristol
Attendees	The Planning Inspectorate: Chris White - Infrastructure Planning Lead Tracey Williams - Case Manager Ewa Sherman - Case Officer David Price - EIA and Land Rights Manager Applicant Richard Wilkinson - Head of Planning and Development (Cory Riverside Energy) Rob Gully - Project Manager, Riverside Energy Park (Cory Riverside Energy) Natalie Maletras - DCO Planning, Consultation and EIA consultants (Peter Brett Associates) Emma Harling-Phillips - DCO Legal advisors (Pinsent Masons)
Meeting objectives	Inception Meeting
Circulation	All attendees

Summary of key points discussed and advice given:

Welcome and Introductions

The Applicant and the Planning Inspectorate (the Inspectorate) team introduced themselves and their respective roles. The Inspectorate outlined its openness policy and ensured that those present understood that any issues discussed and advice given would be recorded and placed on the Inspectorate's website under section 51 of the Planning Act 2008 (PA2008). Further to this, it was made clear that any advice given did not constitute legal advice upon which the Applicant (or others) can rely.

Project

The Applicant is Cory Environmental Holdings Limited (trading as Cory Riverside Energy (CRE)).

The Applicant is proposing to submit a Development Consent Order (DCO) for Riverside Energy Park which is proposed to be located on land adjoining the existing

Riverside Resource Recovery Facility (RRRF) at the Belvedere site in London Borough of Bexley (LBB).

The proposed integrated Energy Park development would include an Energy Recovery Facility, battery storage, an anaerobic digestion facility and solar panels, with the combined generating capacity of up to 96 MW. The proposed development will be CHP (Combined Heat and Power) ready.

Currently the draft scoping boundary includes two potential electric cable routes, north-west to the Barking Power Station substation and south-east towards the Littlebrook Power Station substation, near Dartford Tunnel. Only one connection will be required. The Applicant confirmed that the preferred grid connection will be confirmed by UK Power Networks who will make a final decision based on the practical constraints, technical considerations and their statutory obligations. The Inspectorate advised that it takes a precautionary approach when issuing the Scoping Opinion, therefore the Applicant should be aware that two connection routes will need to be assessed for the purpose of their Scoping Report. The Inspectorate advised that it is currently updating [Advice note Seven](#) in relation to the Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping.

The Applicant explained the principles of the project's proposed design and site layout. The Applicant owns and operates the existing RRRF, and confirmed that it will continue to operate (and not be decommissioned nor altered). The proposed development would operate as a separate facility, although some elements of shared infrastructure would remain in place.

No new permanent access routes or off-site facilities are envisaged, and the Applicant intends to use the existing jetty / wharf on the River Thames. The Inspectorate enquired whether a Deemed Marine Licence would be included in the DCO. The Applicant stated that river options were still being considered, but if required it will form part of the DCO for the temporary works required during the construction phase of the project.

The consultation programme has been developed and the Applicant is scheduling meetings with the local authorities (LAs) and key statutory bodies. The Applicant will engage in discussions with the following Local Authorities: London Borough of Bexley (host authority), Borough of Barking and Dagenham Council, Royal Borough of Greenwich, and Borough of Dartford. The Greater London Authority (GLA) and the Port of London Authority (PLA) will also be consulted together with local stakeholders.

Land on the offsite electrical cable route connection is not controlled by the Applicant and therefore compulsory acquisition may be sought in the application if agreement cannot be reached. The Applicant isn't aware of any Crown land or special category land but is making diligent inquiries. At the moment the draft scoping boundary covers a conservative area which is being scoped.

Practical arrangements

The Applicant set out their consultation programme, including provisional timings for requesting a scoping opinion, starting consultation on a draft Statement of Community Consultation (SoCC), statutory (s42) consultation and submission of the DCO application. The EIA Scoping Report is due to be submitted to the Planning Inspectorate in November 2017.

The Inspectorate advised the Applicant to consider allowing time for a review of the draft documents. A full review of draft documents by the Inspectorate takes about 6 to 8 weeks, but this depends on the number of documents and the particular issues raised. The Applicant confirmed their intention to use this service.

Specific decisions / follow up required

- A visit to the site will be arranged for the members of the Inspectorate's Environmental Services Team during the early scoping stage for the project.
- The Applicant and the Inspectorate agreed to hold project update meetings / teleconferences around the key milestones during the pre-application period such as following the issue of a Scoping Opinion.
- The Inspectorate to request from the Applicant the necessary information to set up the project page on the National Infrastructure Planning website.