

Riverside Energy Park

Statement of Common Ground: Environment Agency (Signed)

VOLUME NUMBER:

08

PLANNING INSPECTORATE REFERENCE NUMBER:

EN010093

DOCUMENT REFERENCE:

8.01.11

August 2019 | Revision 1 (Deadline 5)

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

Riverside Energy Park Belvedere

Statement of Common Ground between the Applicant and The Environment Agency

9 August 2019

Revision	Date	Description
Draft	December 2018	Draft for discussion
Draft	March 2019	Further amendments following EA meeting 22/03/19 and Relevant Representation
Draft	14 th May 2019	Further amendments following EA correspondence dated 13 th May
Draft	30 th July 2019	Further amendments following discussions with the EA
Final	9 th August 2019	Issue for signing

1 Introduction

1.1 Purpose of this Statement of Common Ground

1.1.1 This Statement of Common Ground (SOCG) has been prepared by Cory Environmental Holdings Limited (trading as Cory Riverside Energy ('the Applicant')) and the Environment Agency (EA). For the purposes of this SOCG, the Applicant and EA will jointly be referred to as 'the Parties'.

1.1.2 The Applicant has applied to the Secretary of State under the Planning Act 2008 for powers to construct, operate and maintain an integrated Energy Park, to be known as Riverside Energy Park (REP). The principal elements of REP comprise complementary energy generating development and an associated Electrical Connection (together referred to as the 'Proposed Development').

1.1.3 Preparation of this SOCG has been informed by discussions between the Parties. The purpose of this SOCG is to set out agreed factual information about the Application to facilitate an efficient examination process.

1.1.4 This SOCG covers the following topics:

- Tidal Flood Defences;
- Flood Risk Activity Permit;
- Terrestrial Biodiversity;
- Environmental Permit; and
- R1 Application.

1.1.5 Overall, this SOCG is intended to give a clear position of the state and extent of agreement between the Parties at the date on which this SOCG is signed and submitted to the Secretary of State.

1.2 The DCO Application

1.2.1 The DCO Application was submitted on 16th November 2018 and accepted by the Secretary of State on the 14th December 2018. The Application was accompanied by an Environmental Statement (ES).

1.2.2 The Parties agree that the ES forms the full and complete Environmental Impact Assessment (EIA) for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as amended (the EIA Regulations) and it is further agreed that the ES contains sufficient environmental information to enable the Secretary of State to make their determination.

1.3 The Examination

1.3.1 An examination (the Examination) of the Application is to be held pursuant to Chapter 4 of Part 6 of the Planning Act 2008 (the Act) and the Infrastructure Planning (Examination Procedures) Rules 2010 (the EP Rules).

1.4 Description of the Proposed Development

1.4.1 The Proposed Development comprises REP and the associated Electrical Connection. These are described in turn, together with the anticipated REP operations, below. **Chapter 3 Project and Site Description** of the **ES (6.1, REP2-013)** provides further details of the Proposed Development.

REP

1.4.2 REP would be constructed on land immediately adjacent to Cory's existing RRRF, within the London Borough of Bexley (LBB) and would complement the operation of the existing facility. It would comprise an integrated range of technologies including: waste energy recovery, anaerobic digestion, solar panels and battery storage. The main elements of REP would be as follows:

- **Energy Recovery Facility (ERF):** to provide thermal treatment of Commercial and Industrial residual (non-recyclable) waste with the potential for treatment of (non-recyclable) Municipal Solid Waste;
- **Anaerobic Digestion Facility:** to process food and green waste. Outputs from the Anaerobic Digestion facility would be transferred off-site for use in the agricultural sector as fertiliser or as an alternative, where appropriate, used as a fuel in the ERF to generate electricity;
- **Solar Photovoltaic Installation:** to generate electricity. Installed across a wide extent of the roof of the Main REP building;
- **Battery Storage:** to store and supply additional power to the local distribution network at times of peak electrical demand. This facility would be integrated into the Main REP building; and
- **On Site Combined Heat and Power (CHP) Infrastructure:** to provide an opportunity for local district heating for nearby residential developments and businesses. REP would be CHP Enabled with necessary on-site infrastructure included within the REP site.

Electrical Connection

1.4.3 In consultation with UK Power Networks, the Applicant has considered Electrical Connection route options to connect to the existing National Grid Littlebrook substation located south east of the REP site, in Dartford.

1.4.4 The Applicant can confirm that following further technical design work carried out by the Applicant and UK Power Networks, a single Electrical Connection route option is confirmed in the Applicant's submission to the Examination at

Statement of Common Ground

Statement of Common Ground between the Applicant and The Environment Agency

Deadline 2 and the updated **Land Plans (2.1; REP2-003)** and **Works Plans (2.2; REP2-004)** submitted into the Examination at Deadline 2.

2 Matters agreed between the Parties

2.1 Introduction

2.1.1 The Parties are agreed on all matters subject to the clarifications set out in this section below.

2.2 Tidal Flood Defences

Thames Estuary 2100 Plan

2.2.1 Through the indicative diagrams C110-113 (see **Appendix A** of this SOCG), the Parties agree that it has been demonstrated that the Proposed Development does not preclude the raising of the flood defence to the second stage level (of 7.7m AOD expected in 2070) proposed in the Thames Estuary 2100 Plan, and does not significantly restrict future defence raising options. These illustrative drawings were provided at the request of the EA in order to provide examples of technical solutions that could be adopted in the future should the need ever arise to raise the flood bank in line with the requirements of the Thames Estuary 2100 Plan.

Flood Defence Condition Survey

2.2.2 The Applicant is the riparian owners of the flood defence located within the REP site.

2.2.3 The Parties agree that the remedial works proposed within **Section 5.6 of the Flood Defence Condition Survey Summary Report (Appendix E of the Flood Risk Assessment (5.2, APP-033))** shall be completed post consent but prior to operation of REP. These include:

- Repair expansion joints that are in poor conditions (Section 1 – Tide Sheet Pile Wall);
- Repair cracks and missing stones in the stone pitching (Section 1 – Tide Sheet Pile Wall & 2 – Structural Wall); and
- Repair minor concrete spalling at Old Borax Jetty structure (Section 3 – Reinforced concrete apron on CFA piles).

2.2.4 The repair and maintenance of the tarmac surfaced public right of way Thames Path footpath in Section 3 – Reinforced concrete apron on CFA piles - is the responsibility of the Local Highway Authority (London Borough of Bexley).

2.2.5 **Requirement 17** below has been agreed with EA and will be included within the **draft DCO (dDCO) (3.1, Rev 3)**, submitted at Deadline 5:

(1) "No part of Work Number 1 may commence until a river wall condition survey on those parts of the river wall within the order limits has been submitted to and approved by the Environment Agency.

(2) The river wall condition survey submitted pursuant to sub-paragraph (1) must where appropriate identify any remedial works required to bring the tidal flood defence up to a good standard considering a design life of 100-years.

(3) The remedial works required to bring the defence up to a good standard identified pursuant to sub-paragraph (2) must be carried out within 2 years of the date that the condition survey is approved under sub-paragraph (1)."

2.3 Flood Risk Activity Permit Area

2.3.1 The Flood Risk Activity Permit Area (FRAPA) for REP is shown in diagram VAA-WA-50080100_1.0, VAA-WA-50080110_1.0 and VAA-WA-50080101_1.0 appended to this SOCG (see **Appendix B**).

2.3.2 The necessity to apply for a Flood Risk Activity Permit will be disapplied as part of the DCO, with all necessary controls being provided for in the protective provisions for the benefit of the Environment Agency to be included in **Part 4 of Schedule 10** of the **dDCO (3.1, Rev 3)** submitted at Deadline 5. This will include a requirement for the Applicant to notify the EA of any works anticipated within this area (both during construction and operation).

2.3.3 During construction, activities within the FRAPA are anticipated to include material storage and part of a laydown area required during the erection of a mobile crane.

2.3.4 During operation of REP, activities within the FRAPA are anticipated to include a service road (as indicated in diagram VAA-WA-50080101_1.0). The Parties agree that no buildings (as defined within the **dDCO (3.1, Rev 3)** as "...includes any structure or erection or any part of a building, structure or erection") will be placed within the Flood Risk Activity Area.

2.3.5 Wording for **Requirement 23** of the **dDCO (3.1, Rev 3)** has been agreed with the EA.

No buildings shall be erected within the area defined by the red dotted line annotated as '16m FRAP Line' on Weedon Architects drawing 'DCO Boundaries and FRAP Area Indicative Building Layout' number VAA-WA-50080101_1.0 dated 23.03.19. In addition no material shall be stored, within the area defined by the red dotted line annotated as '16m FRAP Line' on Weedon Architects drawing 'DCO Boundaries and FRAP Area Indicative Building Layout' number VAA-WA-50080101_1.0 dated 23.03.19, which could create a risk of damage to the integrity of the flood defence structure within this area.

2.4 Confirmation of Finished Floor Levels

2.4.1 The EA requested that a requirement is placed in the dDCO to specify the finished floor levels of the main building.

2.4.2 The Applicant can confirm that the finished floor level of the main building will be set no lower than 2.97 m AOD as specified within **Table 3.1** of the **Flood**

Risk Assessment (5.2, APP-033). Requirement 24 has been inserted into Schedule 2 of the **dDCO (3.1, Rev 3)**.

2.5 Terrestrial Biodiversity

2.5.1 The Parties agree that whilst advice on biodiversity issues has been presented by the EA to the applicant, the EA do not intend to object to the Application on these issues.

2.6 Open Mosaic Habitat

2.6.1 The creation of Open Mosaic Habitat on the flood embankment and the potential for this to affect the ability of the riparian owner and the EA to inspect the flood defence for defects and damage has been discussed with the EA.

2.6.2 Following these discussions, the Applicant can confirm they will not be utilising the flood embankment for the creation of the Open Mosaic Habitat.

2.7 Environmental Permit

2.7.1 The Parties agree that the following matters, relating to the commissioning and operational phases of REP, are to be addressed as part of the Environmental Permit application as Duly Made on 17 December 2018, and no further details are required as part of the DCO application:

- Checking of air quality modelling;
- Checking of noise modelling; and
- Fire water management within the boundary of the proposed permit.

2.7.2 It is understood that the EPR permit will not cover the construction phase or any part of the site once it is decommissioned i.e. the demolition/site clearance phase.

2.7.3 It is understood that the EPR permit will include conditions around the quantities and types of waste which can be processed at REP. This will include the following conditions:

- Limits on the quantities of waste materials which can be received and processed at each of the proposed waste processing activities at REP will be included.
- The types of waste which can be received and processed at each of the proposed waste processing activities at REP will be defined in a schedule to the permit.
- There will be a requirement to develop and implement procedures to ensure that only the quantities and types of waste, which are permitted within the Environmental Permit, are received at each of the proposed waste processing activities at REP.

- The ERF will be prohibited from receiving and processing waste which has been separately collected for recycling, unless it is contaminated and otherwise unsuitable for recycling and destined for landfill.

2.7.4 The Parties agree that as per '*Guidance for developments requiring planning permission and environmental permits*' dated October 2012 and consultation with the EA, the Environmental Permit and DCO applications have been 'parallel tracked'.

2.8 Stage R1 application

2.8.1 The Parties agree that the classification of the ERF as a 'recovery facility' will be determined by the EA in accordance with the Design Stage R1 application which was submitted to the EA on 7 February 2019.

2.9 Draft Development Consent Order (dDCO)

2.9.1 It is agreed that beyond the modifications agreed to the Requirements outlined above, there are no additional areas of concern in relation to the Requirements set within the **dDCO (3.1, Rev 3)**.

3 Matters yet to be agreed between the Parties

3.1 Protective Provisions

- 3.1.1 The Applicant is currently in active discussions with the Environment Agency in relation to the Protective Provisions in **Part 4** of **Schedule 10** of the **dDCO (3.1, Rev 3)** submitted at Deadline 5. The Applicant anticipates these will be agreed before the end of the Examination

4 Confirmation of Agreement

This SOCG is prepared jointly and agreed by the Parties:

Signed for and on behalf of the Applicant

Date:



8th August 2019

Signed for and on behalf of the Environment
Agency

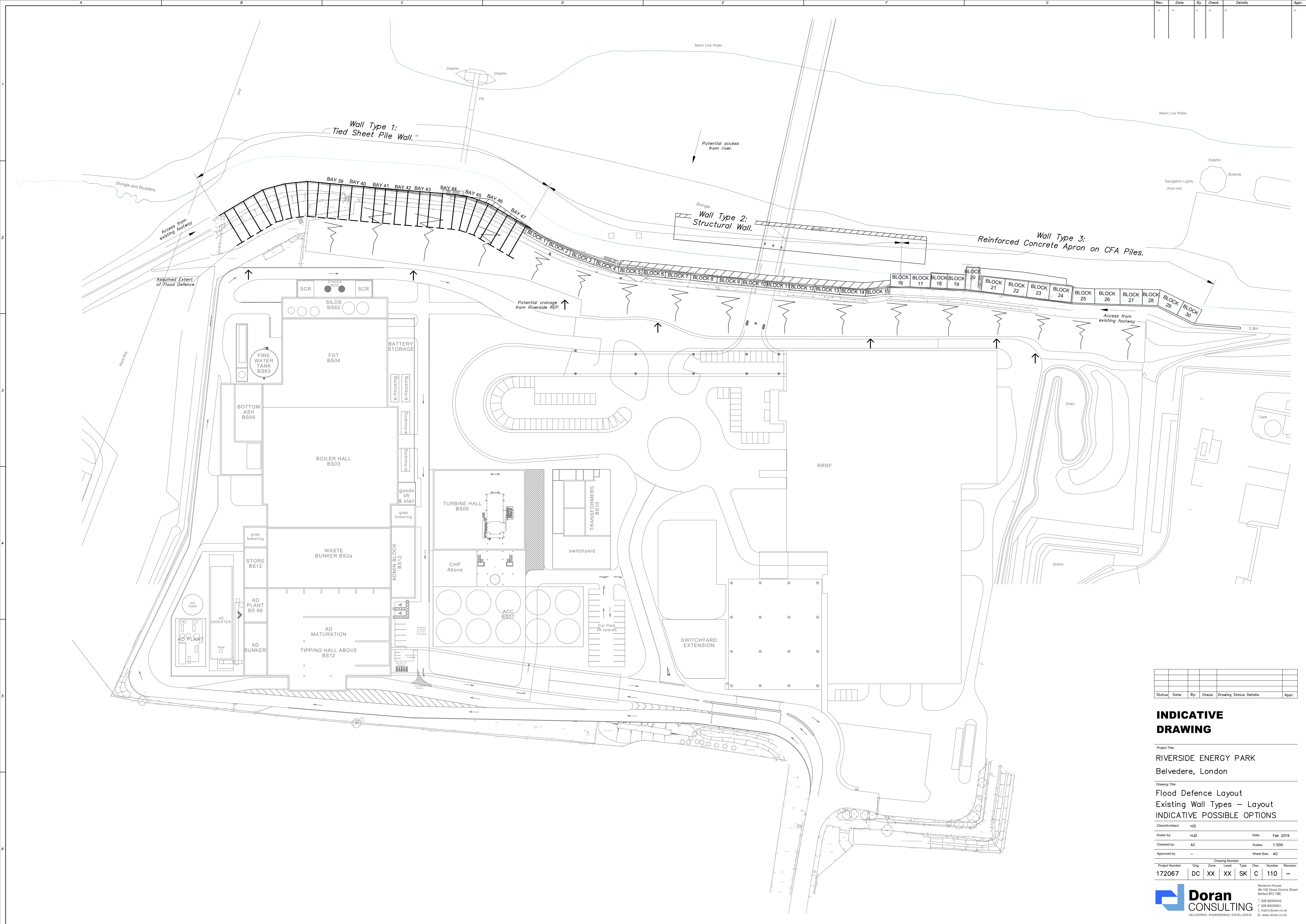
Date:



9th August 2019

Appendix A Indicative Flood Defence Potential Options

Rev.	Date	By	Check	Details	Appr.
-	-	-	-	-	-



Status	Date	By	Check	Drawing Status	Details	Appr.
-	-	-	-	-	-	-

INDICATIVE DRAWING

Project Title:
RIVERSIDE ENERGY PARK
Belvedere, London

Drawing Title:
Flood Defence Layout
Existing Wall Types – Layout
INDICATIVE POSSIBLE OPTIONS

Client/Architect: H2I

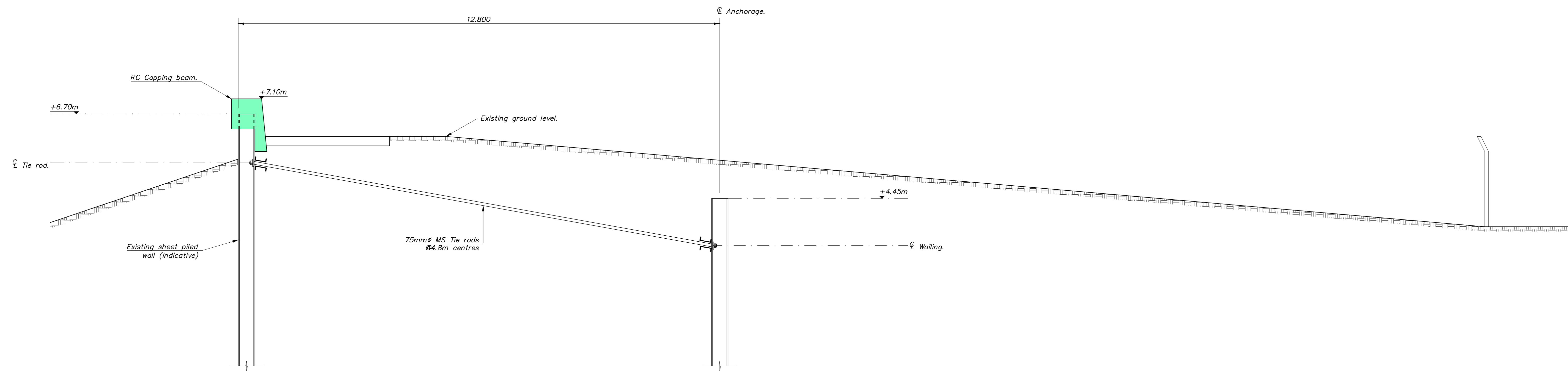
Drawn by: HJD Date: Feb 2019
Checked by: AC Scales: 1:500
Approved by: - Sheet Size: A0

Drawing Number:
Project Number: 172067
Orig: DC Zone: XX Level: XX Type: SK Disc: C Number: 110 Revision: -

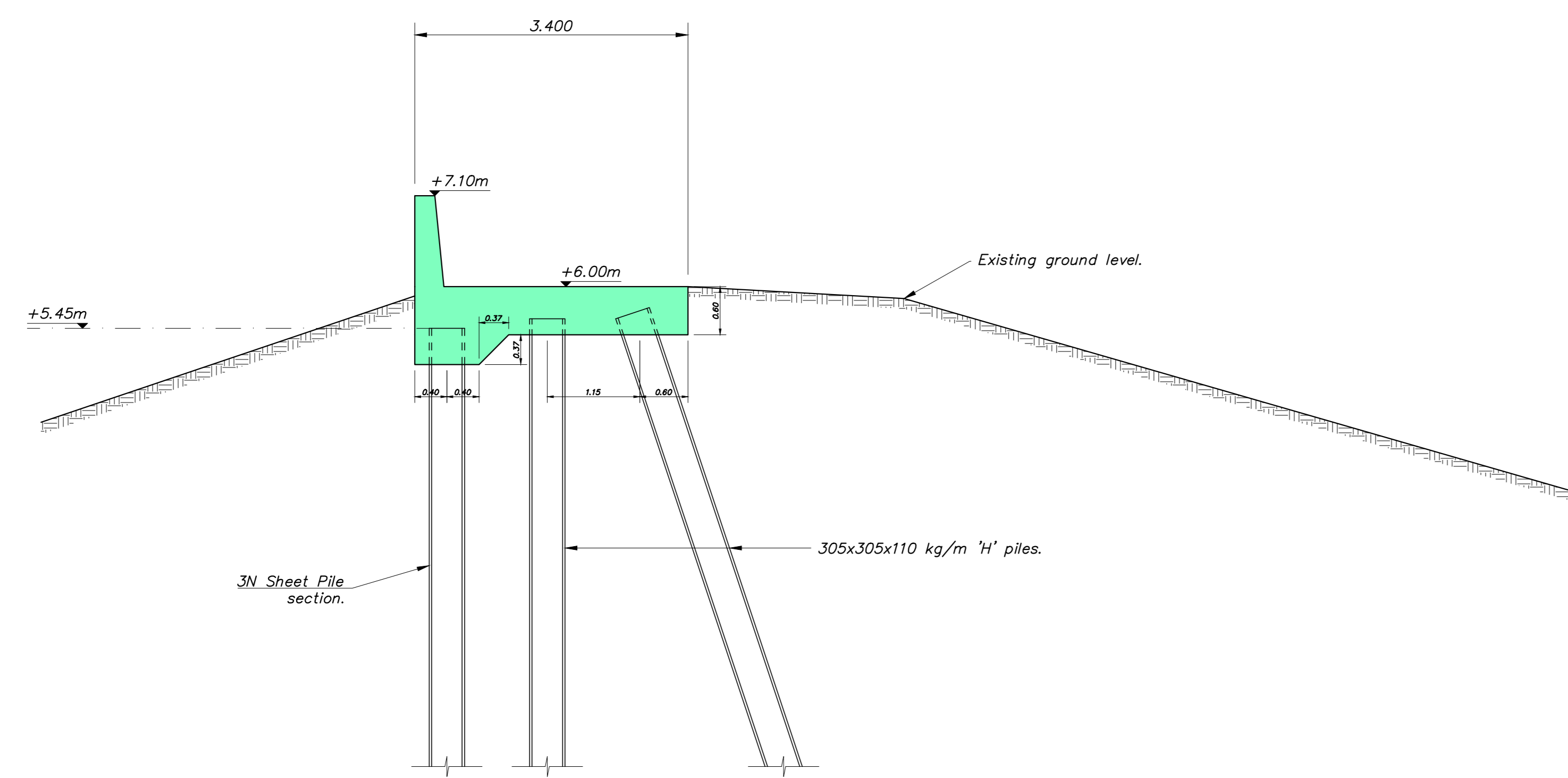
Doran CONSULTING
DELIVERING ENGINEERING EXCELLENCE

Nowwood House
95-105 Great Victoria Street,
Belfast BT2 7BE
T 028 90333443
F 028 90220501
E mail@doran.co.uk
W www.doran.co.uk

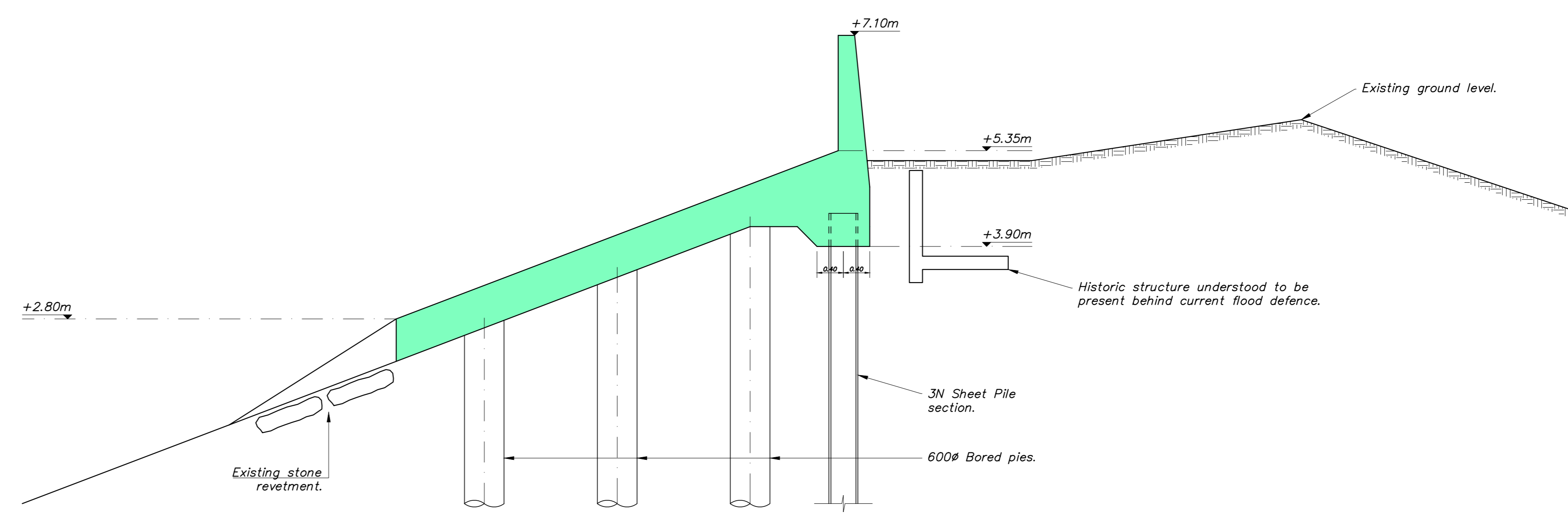
Rev.	Date	By	Check	Details	Appr.
-	-	-	-	-	-



Typical Section
Existing Wall Type 1 - Tied Sheet Pile Wall
1:50



Typical Section
Existing Wall Type 2 - Structural Wall
1:50



Typical Section
Existing Wall Type 3 - Reinforced Concrete Apron on CFA Piles
1:50

Legend.
Existing Structure

Note.
Information on existing structures has been obtained from Record/As-built drawings provided by the Environment Agency.

Status	Date	By	Check	Drawing Status	Details	Appr.
-	-	-	-	-	-	-

INDICATIVE DRAWING

Project Title:
RIVERSIDE ENERGY PARK
Belvedere, London

Drawing Title:
Flood Defence Layout
Existing Wall Types - Sections
INDICATIVE POSSIBLE OPTIONS

Client/Architect: HZI

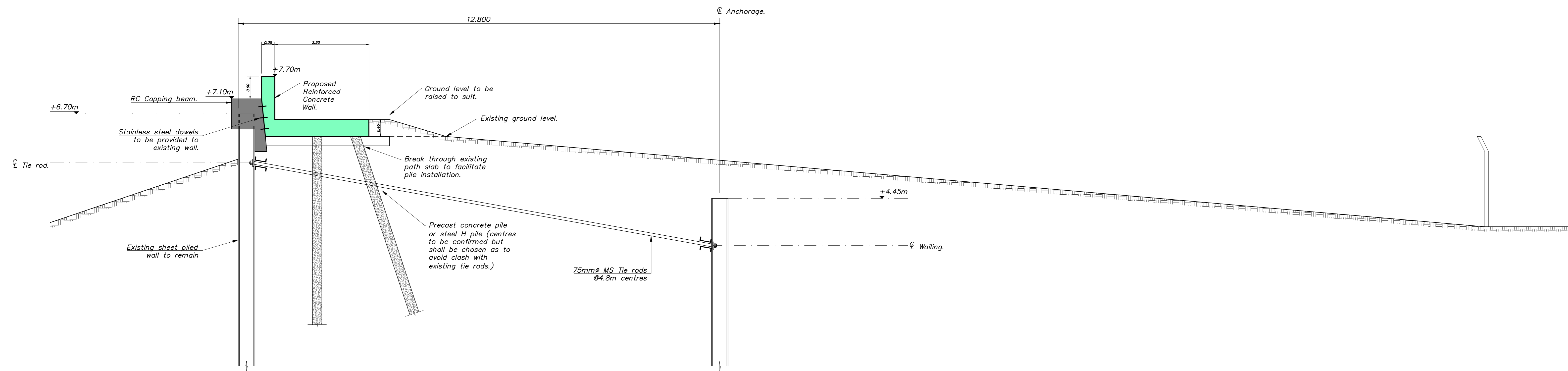
Drawn by: HJD Date: Feb 2019

Checked by: AC Scales: 1:100

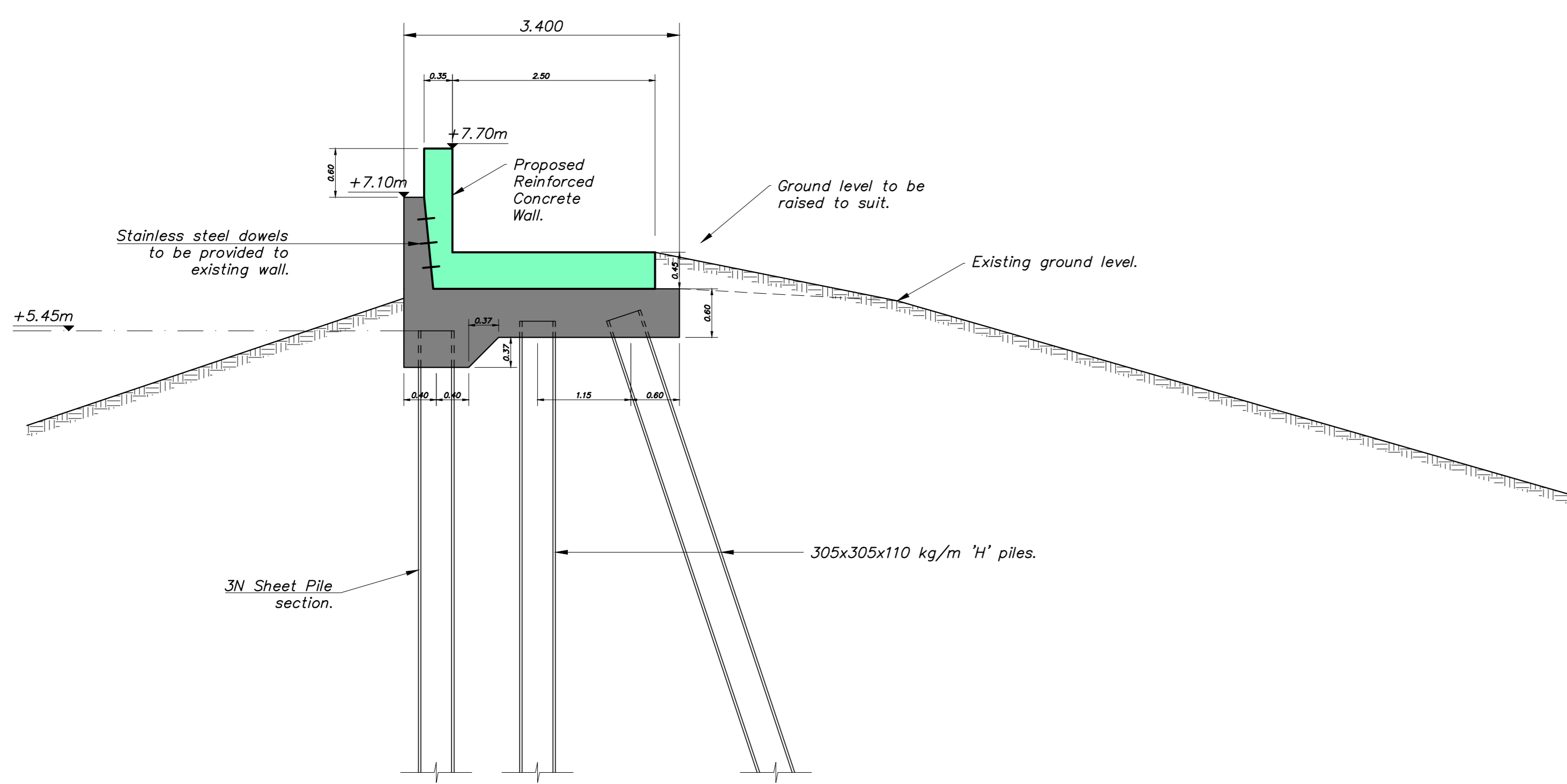
Approved by: - Sheet Size: A0

Project Number	Orig.	Zone	Level	Type	Disc.	Number	Revision
172067	DC	XX	XX	SK	C	111	-

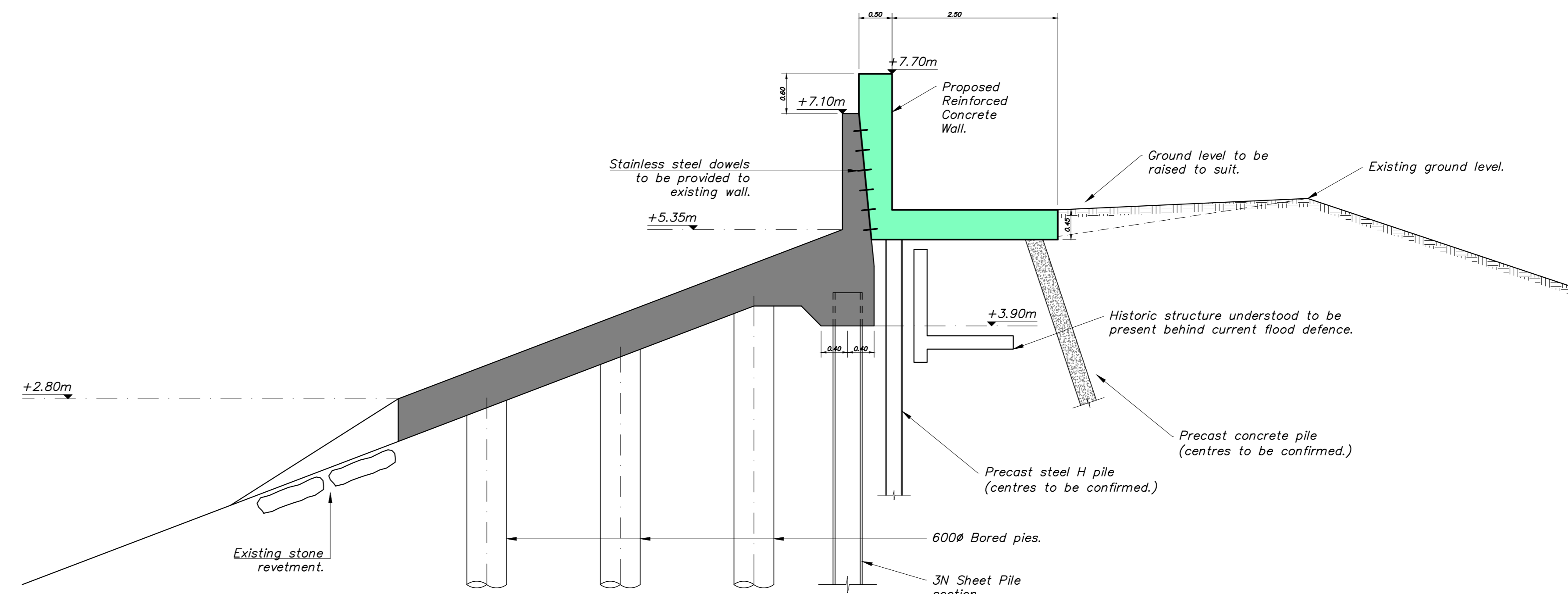
Rev.	Date	By	Check	Details	Appr.
-	-	-	-	-	-



Typical Section.
Existing Wall Type 1 - Tied Sheet Pile Wall
Option A - Adjacent RC Structure
1:50



Typical Section.
Existing Wall Type 2 - Structural Wall
Option A - Additional RC Structure
1:50



Typical Section.
Existing Wall Type 3 - Reinforced Concrete Apron on CFA Piles
Option A - Adjacent RC Structure
1:50

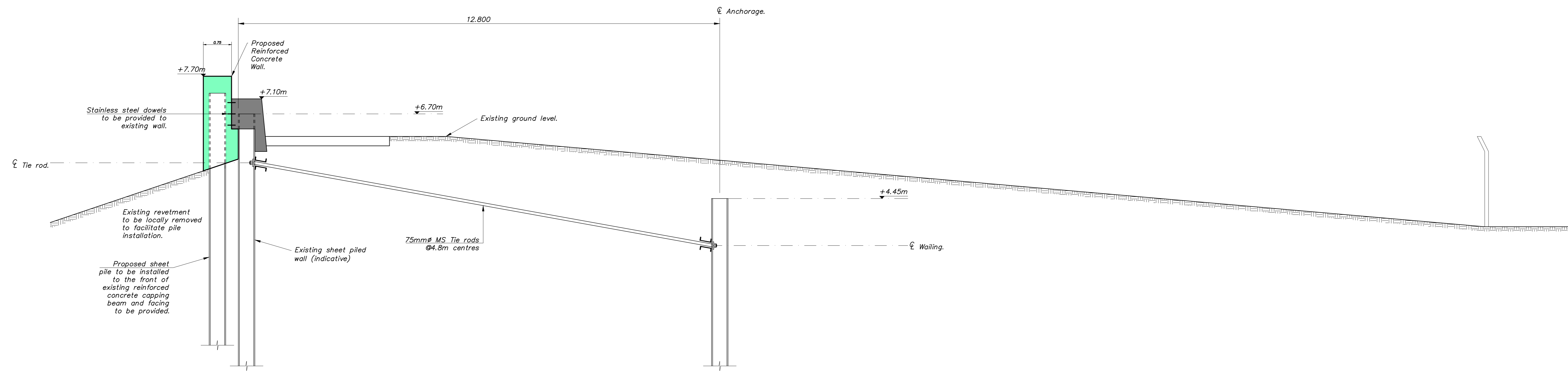
Legend.
 Existing Structure
 Proposed Reinforced Concrete
Note.
 Information on existing structures has been obtained from Record/As-built drawings provided by the Environment Agency.

Status	Date	By	Check	Drawing Status	Details	Appr.
-	-	-	-	-	-	-

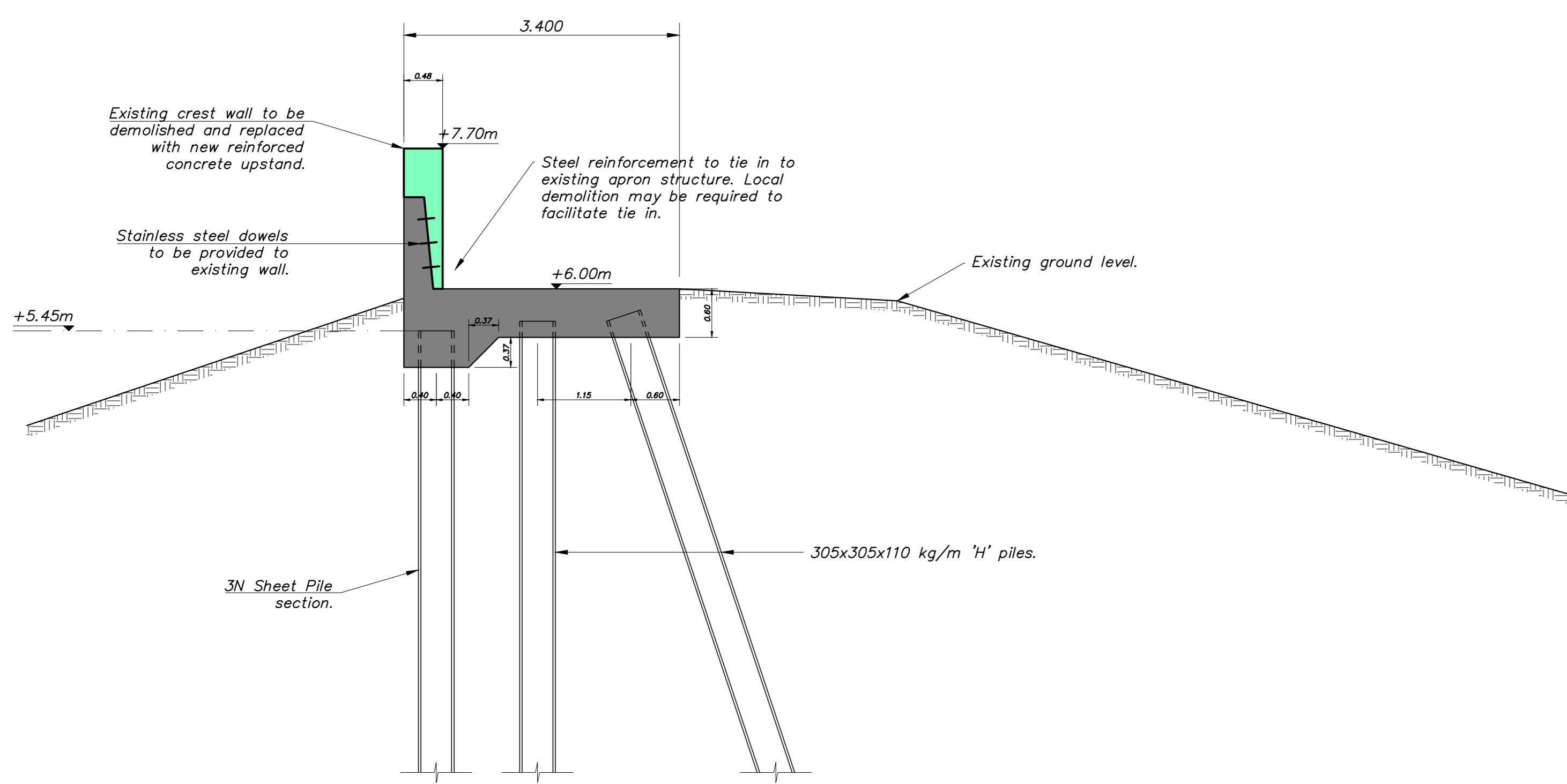
INDICATIVE DRAWING

Project Title:						
RIVERSIDE ENERGY PARK						
Belvedere, London						
Drawing Title:						
Raising of Flood Defence						
Option A - Sections						
INDICATIVE POSSIBLE OPTIONS						
Client/Architect: HZI						
Drawn by: HJD Date: Feb 2019						
Checked by: AC Scales: 1:100						
Approved by: - Sheet Size: A0						
Project Number:	Orig:	Zone:	Level:	Type:	Disc:	Number:
172067	DC	XX	XX	SK	C	112
Revision:						
-						

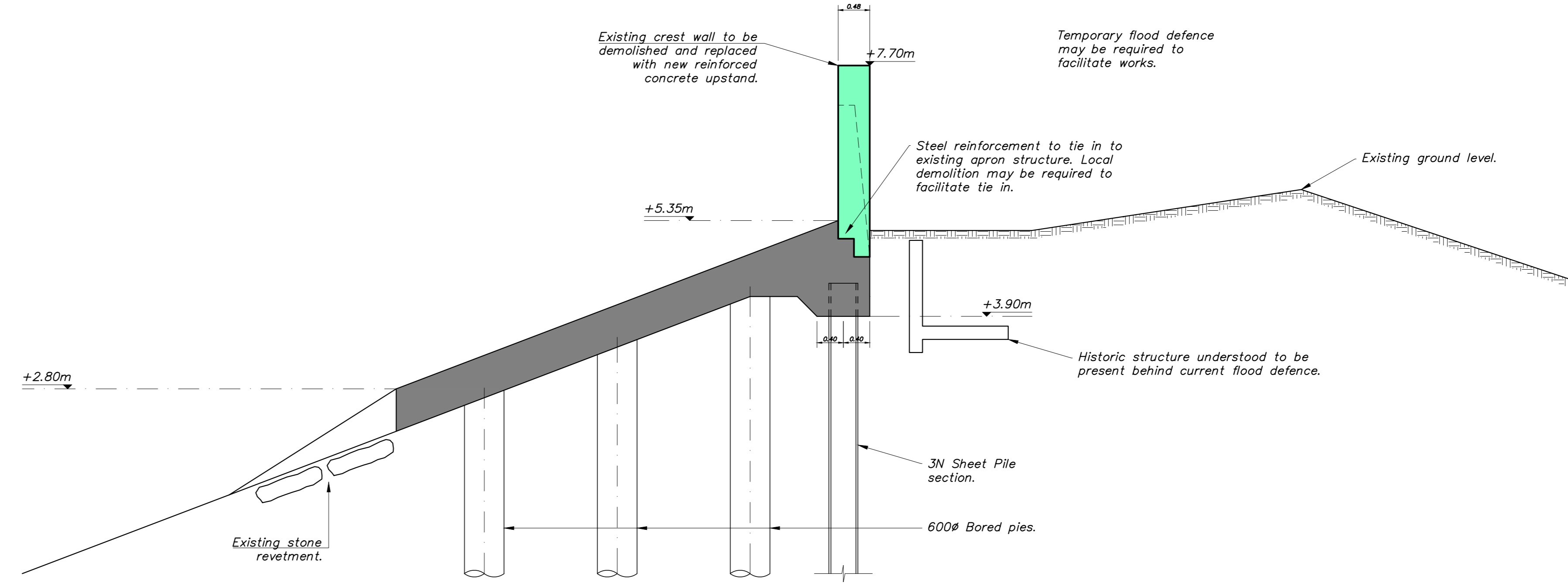
Rev.	Date	By	Check	Details	Appr.
-	-	-	-	-	-



Typical Section.
Existing Wall Type 1 - Tied Sheet Pile Wall
Option B - New Sheet Pile Wall
1:50



Typical Section.
Existing Wall Type 2 - Structural Wall
Option B - New Crest Wall
1:50



Typical Section.
Existing Wall Type 3 - Reinforced Concrete Apron on CFA Piles
Option B - New Crest Wall
1:50

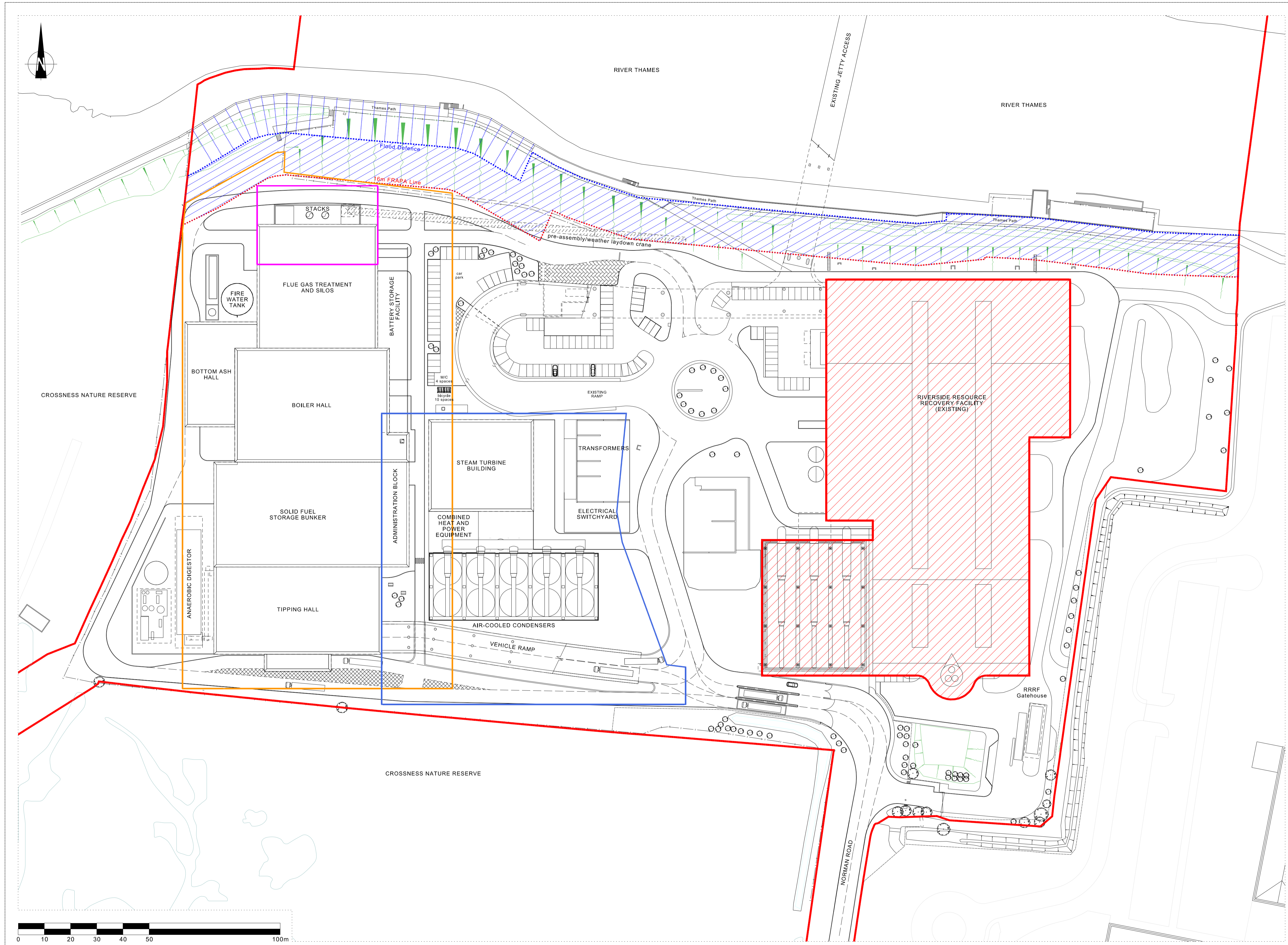
Legend.
 Existing Structure
 Proposed Reinforced Concrete
Note.
 Information on existing structures has been obtained from Record/As-built drawings provided by the Environment Agency.

Status	Date	By	Check	Drawing Status	Details	Appr.

INDICATIVE DRAWING

Project Title:						
RIVERSIDE ENERGY PARK						
Belvedere, London						
Drawing Title:						
Raising of Flood Defence						
Option B - Sections						
INDICATIVE POSSIBLE OPTIONS						
Client/Architect: H2I						
Drawn by: HJD		Date: Feb 2019				
Checked by: AC		Scales: 1:100				
Approved by: -		Sheet Size: A0				
Project Number:	Orig:	Zone:	Level:	Type:	Disc:	Number:
172067	DC	XX	XX	SK	C	113
Revision:						
-						

Appendix B DCO Boundary Flood Risk Activity Permit Drawings



- KEY:**
- ORDER LIMITS
 - - - FLOOD DEFENCE
 - / / / FLOOD RISK ACTIVITY PERMIT AREA (FRAPA)
 - - - 16m FRAPA LINE

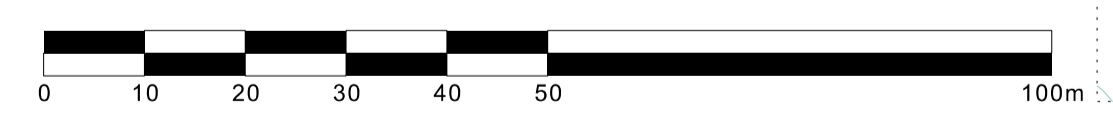
- PARAMETERS KEY:**
- MAIN REP BUILDING
 - STACKS

NOTES:

Flood defence line taken from Doran Flood Defence Section drawing No. 172067-DC-SK-C-114 Flood Defence Sections

Read in conjunction with:
 VAA-WA-50080101 DCO Boundaries and FRAPA Indicative Building Layout
 VAA-WA-50080110 DCO Boundaries and FRAPA Existing Flood Defence Sections

Figure 1.3a Illustrative Site Layout and Parameters Plan
 Figure 1.3b Illustrative North and East Parameter Elevations
 Figure 1.3c Illustrative South and West Parameter Elevations



WEEDON
 architects

Harry's Yard
 176-178 Newhall St
 Birmingham B3 1SJ
 www.weedonarchitects.co.uk

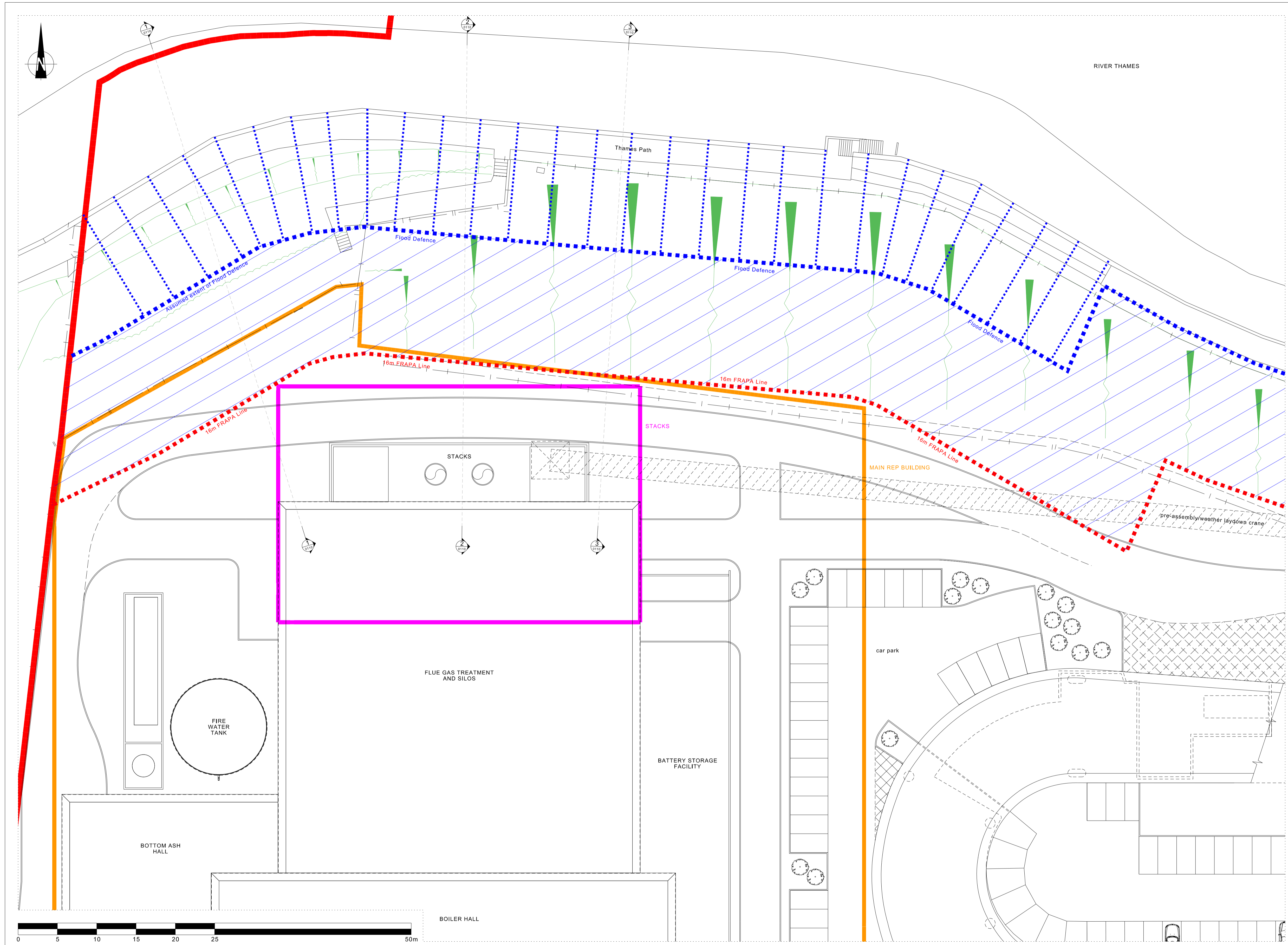
T: 0121 454 4171
 F: 0121 455 9152

© Weedon Architects LLP

CORY
 RIVERSIDE ENERGY

RIVERSIDE ENERGY PARK
 NORMAN ROAD BELVEDERE LONDON
 DCO BOUNDARIES AND FLOOD RISK ACTIVITY PERMIT AREA
 INDICATIVE BUILDING LAYOUT

Date	13.05.19
A1 Scale	1:750
Drawn by	AG
Checked by	PC
Drawing Number	VAA-WA-50080100_1.0



- KEY:**
- █ ORDER LIMITS
 - █ FLOOD DEFENCE
 - ▨ FLOOD RISK ACTIVITY PERMIT AREA (FRAPA)
 - █ 16m FRAPA LINE

- PARAMETERS KEY:**
- █ MAIN REP BUILDING
 - █ STACKS

NOTES:

Flood defence line taken from Doran Flood Defence Section drawing No. 172067-DC-SK-C-114 Flood Defence Sections

Read in conjunction with:
 VAA-WA-50080100 DCO Boundaries and FRAPA Indicative Building Layout
 VAA-WA-50080110 DCO Boundaries and FRAPA Existing Flood Defence Sections

Figure 1.3a Illustrative Site Layout and Parameters Plan
 Figure 1.3b Illustrative North and East Parameter Elevations
 Figure 1.3c Illustrative South and West Parameter Elevations

WEEDON architects
 Harry's Yard
 176-178 Newhall St
 Birmingham B3 1SJ
 www.weedonarchitects.co.uk

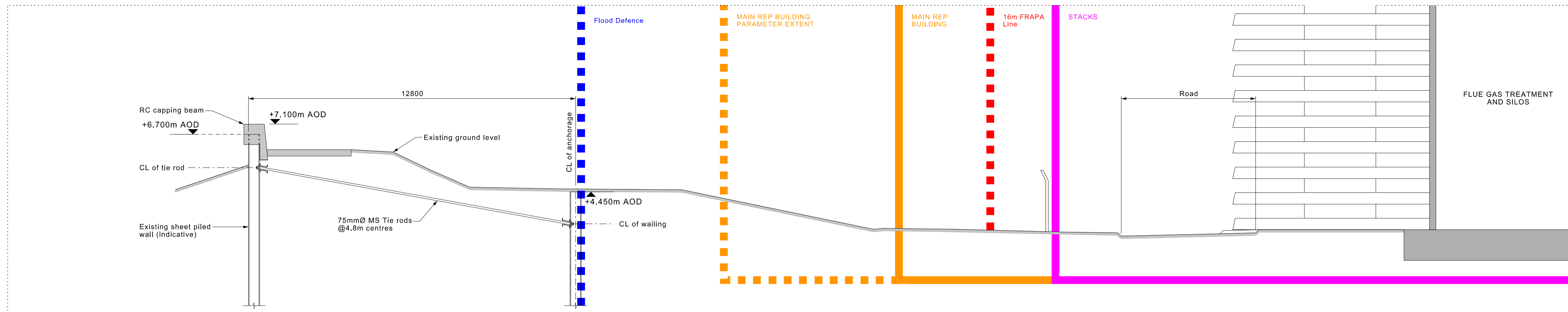
T: 0121 454 4171
 F: 0121 455 9152

© Weedon Architects LLP

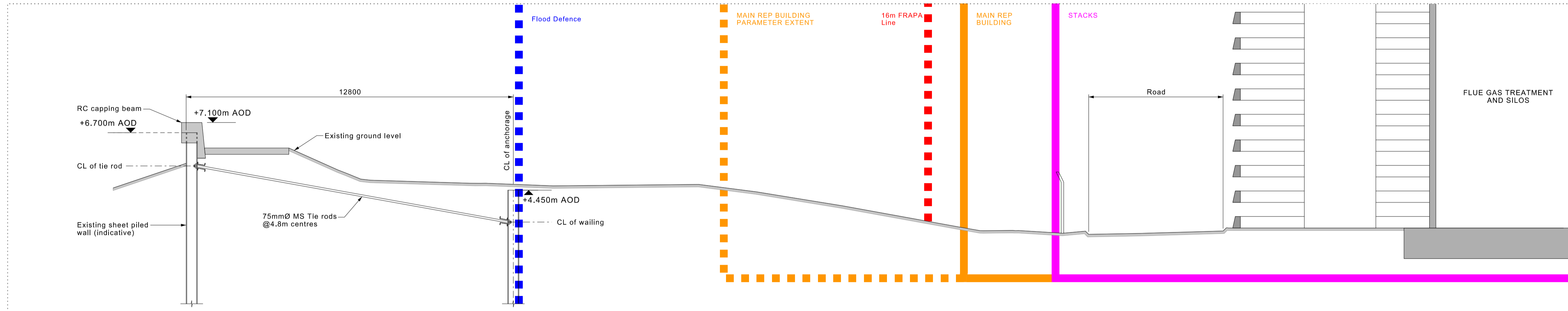
CORY
 RIVERSIDE ENERGY

RIVERSIDE ENERGY PARK
 NORMAN ROAD BELVEDERE LONDON
 DCO BOUNDARIES AND FLOOD RISK ACTIVITY PERMIT AREA
 INDICATIVE BUILDING LAYOUT

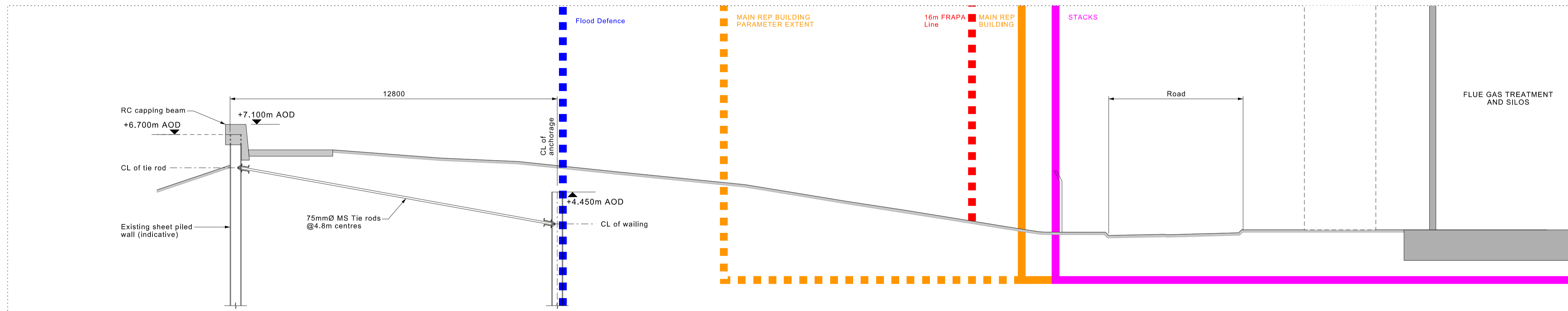
Date	13.05.19
A1 Scale	1:250
Drawn by	AG
Checked by	PC
Drawing Number	VAA-WA-50080101_1.0



Section 1-1



Section 2-2



Section 3-3

- KEY:**
- █ ORDER LIMITS
 - █ FLOOD DEFENCE
 - FLOOD RISK ACTIVITY PERMIT AREA (FRAPA)
 - 16m FRAPA LINE

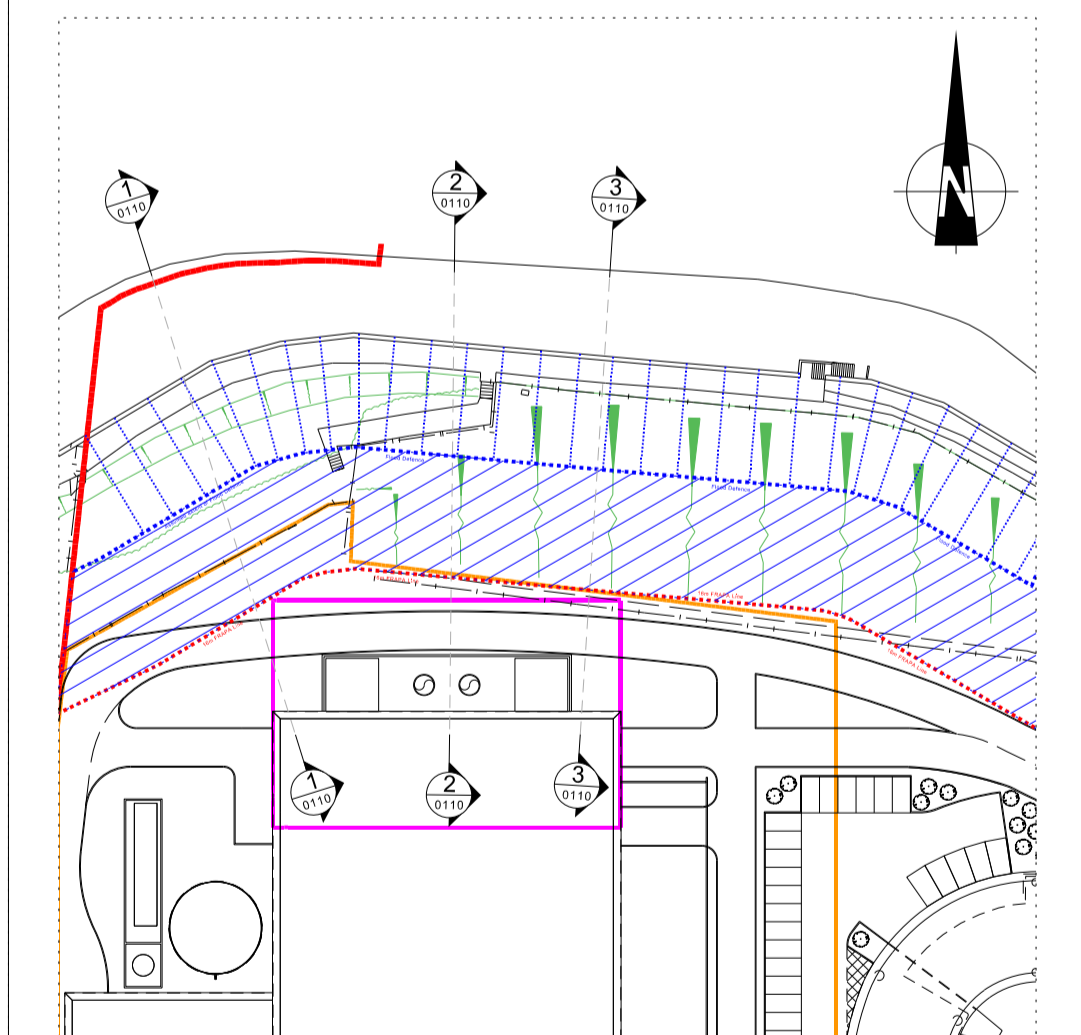
- PARAMETERS KEY:**
- MAIN REP BUILDING
 - STACKS

NOTES:

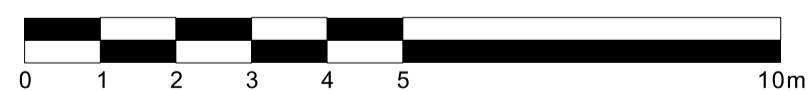
Flood defence line taken from Doran Flood Defence Section drawing No. 172067-DC-SK-C-114 Flood Defence Sections

Read in conjunction with:
 VAA-WA-50080100 DCO Boundaries and FRAPA Indicative Building Layout
 VAA-WA-50080101 DCO Boundaries and FRAPA Indicative Building Layout

Figure 1.3a Illustrative Site Layout and Parameters Plan
 Figure 1.3b Illustrative North and East Parameter Elevations
 Figure 1.3c Illustrative South and West Parameter Elevations



Location Plan 1:1000



RIVERSIDE ENERGY PARK
 NORMAN ROAD BELVEDERE LONDON
 DCO BOUNDARIES AND FLOOD RISK ACTIVITY PERMIT AREA
 EXISTING FLOOD DEFENCE SECTIONS

Date	13.05.19
A1 Scale	1:100
Drawn by	AG
Checked by	PC
Drawing Number	VAA-WA-50080110_1.0