

Riverside Energy Park

Summary of Consultation and Update on the
Statement of Common Ground between
the Applicant and Greater London Authority

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Riverside Energy Park

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1 Introduction

1.1 Purpose of this Document

1.1.1 This document has been submitted to the Examination to provide the Examining Authority with an overview of the consultation undertaken between the Applicant and the Greater London Authority (GLA) throughout the pre-application, pre examination and examination phases of the DCO Application; and a status update on the progress of the Statement of Common Ground (SOCG) between the Applicant and the GLA ('the parties').

1.2 Structure of this Document

1.2.1 This document is structured as follows:

- **Section 2:** provides a summary of the consultation between the Applicant and the GLA during the pre-application, pre examination and examination phases of the DCO Application;
- **Appendix A:** provides a copy of Revision 2 of the draft SOCG between the Applicant and GLA (including the GLA's comments dated 15th May 2019); and
- **Appendix B:** provides a copy of the latest revision (Revision 3) of the draft SOCG which the Applicant has issued to the GLA ahead of a further meeting scheduled between the parties on 21st August 2019.

2 Summary of Consultation between the Applicant and the Greater London Authority

2.1 Introduction

2.1.1 Throughout the pre-application, pre-examination and examination phases of the DCO Application, the Applicant has made continued efforts to engage with the GLA about the Proposed Development and has sought to develop a Statement of Common Ground (SOCG) between the parties.

2.2 Non-Statutory Engagement (November 2017 – July 2018)

2.2.1 The Applicant sought to inform and engage with the GLA about the Proposed Development from an early stage. The primary aim of the non-statutory engagement was to notify and inform prescribed consultees, such as the GLA, about the Proposed Development and to identify key areas of interest which might have the potential to influence the DCO Application for the Proposed Development.

2.2.2 Non-statutory engagement with the GLA comprised of a series of briefing meetings, discussions over the phone and by email, technical notes and site visits to the Applicant's existing RRRF. Key dates include:

- 15th January 2018 – site visit to RRRF with members of the London Assembly and GLA;
- 7th February 2018 – project meeting;
- 5th June 2018 – project meeting;
- 20th June 2018 – site visit to RRRF with the case officer at the GLA; and
- 25th June 2018 – the Applicant issued a technical note summarising how REP meets the adopted and draft London Plan policies.

2.2.3 Further details of the non-statutory engagement with the GLA is summarised in **Table 3.1** of the **Consultation Report (5.1, APP-019)** and in **Appendix A** of the **draft SOCG between the Applicant and GLA (Revision 3)** (see **Appendix B** of this document).

2.3 EIA Scoping (November 2017 – January 2018)

2.3.1 In accordance with Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the Infrastructure EIA Regulations 2017'), the Applicant submitted an EIA Scoping Report to the Secretary of State via the Planning Inspectorate (PINS) on 27th November 2017 (received on 28th November 2017), along with a request for an EIA Scoping Opinion. A Scoping Opinion was received from the Secretary of State via PINS on 5th January 2018, following its consultation with prescribed consultees (see **Appendix A.1** of the **Environmental Statement (ES) (6.1, APP-062)**).

2.3.2 The Scoping Opinion included a list of all prescribed consultation bodies consulted by PINS on behalf of the Secretary of State, as required by Regulation 11(1)(b) of the Infrastructure EIA Regulations 2017 ('the Regulation 11 List') and comments on the EIA approach and topic areas, including confirmation of topics unlikely to have a significant environmental effect.

2.3.3 The Applicant was informed that the GLA was identified as a prescribed consultee and a contact detail was provided. The Applicant received the Regulation 11 List on 5th January 2018.

- 2.3.4 Following diligent inquiries, it came to the Applicant's attention in March 2018 that the contact detail on the Regulation 11 List for the GLA (Paul Watling) was incorrect. Paul Watling works for the London Assembly and not the GLA. The Applicant was then provided a contact detail for Kate Randall, a Senior Planner in the Development Management Team at the GLA. During a telephone call between the Applicant and Kate Randall on 13th March 2018, Kate Randall informed the Applicant that the Scoping Report had been received and logged by the GLA.
- 2.3.5 Despite this, the Applicant provided several opportunities for the GLA to provide comments on the scope of the EIA assessment in February 2018. An overview of the engagement is summarised below:
- 7th February 2018 – the Applicant provided a link to the EIA Scoping Report and Scoping Opinion on PINS website to Andrew Richmond at the GLA following their meeting;
 - 8th February 2018 – the Applicant's Landscape Consultant provided a link to the EIA Scoping Report on PINS website to Elliot Kemp at the GLA and offered the opportunity for the GLA to comment on the proposed viewpoints for the Townscape and Visual Impact Assessment;
 - 9th February 2018 – the Applicant provided a link to the EIA Scoping Report and Scoping Opinion on PINS website to Andrew Richmond at the GLA;
 - 14th February 2018 – the Applicant's Air Quality Consultant provided a link to the EIA Scoping Report on PINS website to Stephen Inch at the GLA and requested clarity on policy and the likelihood for additional assessments;
 - 26th February 2018 – the Applicant's Ecologist provided a link to the EIA Scoping Report on PINS website to Peter Massini at the GLA and offered the opportunity for the GLA to comment on the survey scope, proposed screening distances and Biodiversity Metric methodology; and
 - 7th March 2018 – the Applicant received an email from Samantha Davenport at the GLA confirming members of the environment team "*reviewed the scoping report*" and provided comments for air quality and ecology to the Applicant.
- 2.3.6 Further details can be found in **Section 4** of the **Consultation Report (5.1, APP-019)**, **Chapter 6 to 14** of the **ES (6.1, APP-043-APP-051)** and in **Appendix A** of the **draft SOCG between the Applicant and GLA (Revision 3)** (see **Appendix B** of this document).

2.4 Section 42 Consultation (June 2018 – July 2018)

- 2.4.1 In accordance with section 42(1)(c) of the Planning Act 2008 and Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations'), the Applicant consulted with the GLA on the Proposed Development on a statutory basis between 18th June and 30th July 2018. **Section 6** of the **Consultation Report** provides further details on the Applicant's Statutory Consultation process (**5.1, APP-019**).
- 2.4.2 The Applicant issued its statutory consultation documents to the Case Officer on 12th June 2018, which the GLA signed for on 13th June 2018. The statutory consultation documents comprised:
- A covering letter providing an overview of the Proposed Development and details of the consultation process (see **Appendix G.1** of the **Consultation Report (5.1, APP-027)**);
 - A Non-Technical Summary to the Preliminary Environmental Information Report (PEIR NTS) (see **Appendix G.2** of the **Consultation Report (5.1, APP-027)**);
 - An electronic copy of the full PEIR and its technical appendices; and

- A copy of the notice pursuant to section 48 of the Planning Act 2008 (see **Appendix F.1** of the **Consultation Report (5.1, APP-026)**).

2.4.3 During this period, the Applicant responded to numerous questions from the GLA about the PEIR and provided electronic copies of the NTS as requested (see **Appendix A** of the **draft SOCG between the Applicant and GLA (Revision 3)** (**Appendix B** of this document)).

Regard had to GLA's Section 42 Response under Section 49 of the Planning Act 2008

2.4.4 The Applicant received the GLA's statutory consultation response on 30th July 2018 and wished to discuss all matters raised at their scheduled meeting on 11th September 2018. Prior to the meeting, the Applicant provided written comments on the GLA's statutory consultation response and provided technical notes on Air Quality and Waste Capacity to aid discussions and refine issues.

2.4.5 **Appendix J.2** of the **Consultation Report (5.1, APP-030)** sets out the Applicant's final response to the GLA's statutory consultation response and **Appendix J.5** of the **Consultation Report (5.1, APP-030)** includes the technical notes on Air Quality and Waste Capacity.

2.5 Minor Refinements Consultation (August 2018 – September 2018)

2.5.1 The Applicant also undertook further consultation between August 2018 – September 2018 on the minor refinements made to the Indicative Application Boundary that had been consulted on between 18th June – 30th July. The Applicant consulted with the GLA on a non-statutory basis during this time, who were invited to provide comments on the changes (see **Section 8** of the **Consultation Report (5.1, APP-019)** for further details).

2.5.2 The Applicant issued its minor refinements consultation documents to the Case Officer on 13th August 2018, which the GLA signed for on 14th August 2018. The statutory consultation documents comprised:

- A covering letter providing an overview of the minor refinements and details of the consultation process (see **Appendix K.3 (5.1, APP-031)**);
- A plan identifying the new 'A' areas (see **Appendix A.4 (5.1, APP-020)**); and
- A USB drive containing an electronic copy of the Supplementary Information PEIR (SIP) report and associated figures (see **Appendix K.4 (5.1, APP-031)** for a copy of the SIP report).

2.5.3 The Applicant did not receive a formal response from the GLA on the minor refinements consultation.

2.6 Section 56 Consultation (January 2019 – February 2019)

2.6.1 In accordance with section 56(2)(c) of the Planning Act 2008, the Applicant notified the GLA that the Application was accepted for examination. The Applicant issued its 'section 56 consultation' documents to the Case Officer on 2nd January 2019, which the GLA signed for on 3rd January 2019. The section 56 consultation documents comprised:

- A hard copy of the Site Location Plan and a notice under Section 56 of the Planning Act 2008 containing the information prescribed by Regulation 8 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('Section 56 notice');
- A hard copy of the Application form; and

- A USB drive containing a full electronic copy of the DCO Application documents including; accompanying plans and maps, the draft DCO and the Environmental Statement.

2.6.2 The Applicant informed the GLA that any representations (giving notice of any interest in or objection to the Application) must be received by PINS by 11.59pm on 12th February 2019.

2.6.3 The GLA submitted its relevant representation on 12th February 2019. The Applicant responded to issues raised in the GLA's Relevant Representation in **Section 2.5** of the **Applicant's responses to Relevant Representations (8.02.03, REP2-054)**.

2.7 Non-Statutory Engagement (August 2018 – Present)

2.7.1 The Applicant continued to seek engagement with the GLA about the Proposed Development following statutory consultation and submission of the Application. Post-statutory consultation engagement activities have included: project update meetings, discussions and the issue of technical notes.

2.7.2 Key dates of post-statutory consultation engagement include:

- 11th September 2018 – project update meeting;
- 30th January 2019 – the Applicant issued a memo regarding Carbon Intensity Floor (CIF) calculations;
- 1st February 2019 – project update meeting on waste and energy;
- 6th February 2019 – project update meeting on air quality; and
- 12th March 2019 – GLA issued the CIF model.

2.7.3 The Applicant and the GLA are scheduled to meet for a project update meeting on 21st August 2019. Further details of the post-statutory engagement with the GLA is summarised in **Table 10.1** of the **Consultation Report (5.1, APP-019)** and in **Appendix A** of the **draft SOCG between the Applicant and GLA (Revision 3)** (see **Appendix B** to this document).

2.8 Statement of Common Ground

2.8.1 Throughout the pre-application, pre examination and examination phases of the DCO Application, the Applicant has made continued efforts to engage with the GLA about the development a SOCG between the parties.

2.8.2 An overview of the progression of the draft SOCG between the parties is provided below:

- 31st January 2019 – the Applicant issued a draft version of the SOCG to the GLA prior to their meeting on 1st February 2019;
- 13th February 2019 – GLA requested a refined draft version of the SOCG to include “*factual matters – these being the relevant national and London plan policies*”;
- 4th March 2019 – the Applicant issued Revision 1 of the draft SOCG to the GLA;
- 29th March 2019 – GLA provided comments on the waste and energy sections of Revision 1 of the draft SOCG;
- 2nd April 2019 – the Applicant issued Revision 2 of the draft SOCG to the GLA;

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- 8th May 2019 – GLA provided comments on the waste and energy sections of Revision 2 of the draft SOCG; and
 - 17th May 2019 – GLA provided comments on the other technical sections of Revision 2 of the draft SOCG.
- 2.8.3 Despite receiving comments on 8th and 17th May 2019, Revision 2 of the draft SOCG was not moved further forward by the GLA. Rather, the Applicant received a series of comments simply stating “*not agreed*” (see **Appendix A** of this document).
- 2.8.4 The Applicant has since revised the draft SOCG (Revision 3) to reflect the submissions made by both the GLA and the Applicant since the May 2019 version (Revision 2), it has therefore been extensively updated.
- 2.8.5 Revision 3 of the draft SOCG has been issued to the GLA in advance of a meeting which is scheduled between the parties for late August and is included in **Appendix B** of this document.
- 2.8.6 Further details on the correspondence between the Applicant and the GLA regarding the development of the draft SOCG is enclosed in **Appendix A** of Revision 3 of the draft SOCG (see **Appendix B** of this document).
- 2.8.7 The Applicant welcomes constructive comments from the GLA on the latest draft of the SOCG.

Appendix A Revision 2 of the draft SOCG



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Riverside Energy Park Belvedere

Statement of Common Ground between the Applicant and Greater London Authority – the GLA does not agree this Statement of Common Ground

Planning Inspectorate Reference: EN010093

[DATE]

Revision	Date	Description
DRAFT	31/01/2019	Draft for discussion
R1	04/03/2019	Draft following removal of some detailed policy references as following conversation with GLA
R2	02/04/2019	Draft following comments from GLA (received 29th March 2019)

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Commented [VH1]: With VH comments 15 May 2019



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DRAFT

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')), in collaboration with and the Greater London Authority. For the purposes of this SOCG, the Applicant and the Greater London Authority will jointly be referred to as 'the Parties'.

Commented [VH2]: We have fed into it but Cory are the principal authors.

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 Application'). 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, and principally areas where disagreement remain, about the Application to provide information to facilitate an efficient examination process.

Commented [VH3]: Again, principally drafted by Cory.

1.1.4 This SOCG relates to the following topics/issues:

- Principle of the Proposed Development - Planning policy applicable to the Proposed Development;
- Air Quality;
- Waste Management;
- Energy and Heat Off take; and
- Transport.

1.1.5 As set out throughout the document, there remain numerous areas outstanding. The matters not agreed include, but are not limited to, the following:

- Scope of EIA and the acceptability of any proposed assessment and mitigation;
- Complementary nature of REP to the existing RRRF;
- Make-up of the ERF feedstock;
- Air quality assessment, methodology and mitigation measures;
- Waste management;
- Energy and heat off-take; and
- Transport.

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4.1.51.1.6 The Greater London Authority makes no comment in respect of all other topics identified in the Environmental Statement (ES) (**Examination Library Reference APP-038 – APP-100**), Habitats Regulations No Significant Effects Report (**Examination Library Reference APP-101**), and other Application documents.

Commented [DS4]: Remove. We make comments about economic development in our consultation response.

Commented [NM5R4]: Clarification sent to Doug – no previous comments on economic development and none included within GLA Relevant Representation.

Commented [VH6R4]: This should be removed regardless as is unnecessary

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4.1.61.1.7 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.

4.1.71.1.8 All defined terms and abbreviations, if not defined or explained in this SOCG are defined or explained in the Glossary (**Examination Library Reference APP-006**).

1.2 The Application

1.2.1 The Application was submitted on 16th November 2018 and accepted by the Secretary of State on 14th December 2018. The Application was accompanied by the ES and a Habitats Regulations No Significant Effects Report (**Examination Library Reference APP-101**).

1.2.2 It is agreed that the ES forms the full and complete Environmental Impact Assessment (EIA) for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and it is further agreed that the ES contains sufficient environmental information to enable the Secretary of State to make his determination.

Commented [VH7]: This is not agreed and we were not asked to comment on scope

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').

1.3.2 A Preliminary Meeting, pursuant to Rule 7 of the EP Rules, was/will be held on [date of any meetings and location], with the Examination commencing the following day.

1.3.3 The Examining Authority ('the ExA') in its letter pursuant to Rule 6 of the EP Rules, has requested that the Parties enter into a SOCG.

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. It is agreed that **Chapter 3** of the ES (**Examination Library Reference APP-040**) provides further details of the Proposed Development.

REP

1.4.2 REP would be constructed on land immediately adjacent to Cory's existing Riverside Resource Recovery Facility (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:

Commented [VH8]: Not agreed

- **Energy Recovery Facility (ERF):** to provide thermal treatment of Commercial and Industrial (C&I) residual (non-recyclable) waste with the potential for treatment of (non-recyclable) Municipal Solid Waste (MSW);
- **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

Commented [VH9]: Not agreed, we have concerns regarding the content of the feedstock.

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- **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 REP would be connected to the electricity distribution network via a new 132 kilovolt (kV) underground electricity cable connection. The route options for the Electrical Connection are shown in the Works Plans (**Examination Library Reference APP-008**).
- 1.4.4 In consultation with UK Power Networks (UKPN), Cory is considering Electrical Connection route options to connect to the existing National Grid Littlebrook substation located south east of the REP site, in Dartford. The route options are located within the LBB and Dartford Borough, and would run from a new substation proposed to be constructed within the REP site.

Commented [VH10]: We are not part of these discussions so query whether we can comment on this.

1.5 Abbreviations used in this document

- The NPSs, meaning NPS EN-1 and NPS EN-3;
- NPS EN-1, meaning Overarching National Policy Statement for Energy (EN-1), published July 2011;
- NPS EN-3, meaning National Policy Statement for Renewable Energy Infrastructure (EN-3), published July 2011;
- NPS EN-5, meaning National Policy Statement for Electricity Networks (EN-5), published July 2011;
- aLP, meaning the London Plan, adopted March 2016;
- dLP, meaning Draft New London Plan, published August 2018;
- NPPW, meaning National Planning Policy for Waste, published October 2014;
- LACW, meaning Local Authority Collected Waste; and
- SoS, meaning the Secretary of State for Business, Energy and Industrial Strategy.

2 Matters agreed between the Parties

2.1 Introduction Introduction

~~2.1.1 The Parties are agreed on all matters and in particular, are agreed on the points set out in this section (Section 2). This section sets out any matters agreed between the~~

2.2.1 Principle Principle of Proposed Development

~~2.2.11.1.1 In regard to the Principle of Development it is agreed that:~~

~~2.2.21.1.1 As the generating capacity of REP will be in excess of 50 MWe it is classified as a Nationally Significant Infrastructure Project (NSIP) under Sections 14 and 15 of the Act. Therefore, the Application should be determined in accordance with the NPS for EN 1, EN 3 and EN 5 under s104 of the Act.~~

~~2.2.31.1.1 The NPSs set a framework making clear that nationally significant infrastructure is required to deliver energy, from a diverse range of sources, and with a focus on renewable/low carbon supply.~~

~~2.2.41.1.1 NPS EN 1 paragraph 4.1.5 clarifies that development plan documents and other planning guidance documents may be both important and relevant considerations to SoS decision-making and that REP aligns with these (Appendix A includes a list of relevant policy).~~

~~2.2.51.1.1 NPSs establish an urgent need for new energy generation infrastructure of certain types, of which EFWs is one of them and which are governed by EN 3.~~

~~2.2.61.1.1 EFW diverts waste from landfill and therefore is higher up the waste hierarchy, which is in accordance with para 2.5.2 of EN 3.~~

~~2.2.71.1.1 Secondary to meeting energy needs, is the contribution that such a plant could play in meeting waste management strategies (cross refer to the section below on waste management).~~

~~2.2.81.1.1 REP is applying for R1 recovery status and once status is achieved, REP will be classed as a recovery operation.~~

~~2.2.91.1.1 The NPSs place no cap on the delivery of new infrastructure for renewable/low carbon infrastructure;~~

~~2.2.101.1.1 There is no policy requirement to justify the tonnage for REP (see particularly NPS EN 3, paragraph 2.5.13) or to demonstrate the quantitative or market need for REP (see also NPPW, paragraph 7). The assessment relevant to be undertaken for REP is set out at paragraphs 2.5.66/67 of NPS EN 3, and the Secretary of State should be satisfied in relation to the IPC decision making test set out at paragraph 2.5.70 of NPS EN 3.~~

Commented [VH11]: Given that we are not agreed on any of the matters within this section, suggest that this is retitled, and it is ordered through topics instead, with comments on agreement/disagreement made throughout. Two sections entitled 'Matters agreed' and 'Matters not agreed' is misleading and impacts clarity.

Commented [VH12]: We are not agreed on all matters.

Commented [DS13]: Remove. The purpose of this doc is not to agree what's in national policy or how to interpret. Suggest appending all relevant policies as they are written for use as a handy reference library

Commented [NM14R13]: Agreement (or disagreement) on these statements is an important element of the SOCG. I have moved to 'Matters not agreed' for now but should the GLA consider they can agree then this can be moved back.

2.32.2 Air Quality

Commented [NM15]: Awaiting comment from GLA

2.3.12.2.1 The scope of the Air Quality assessment is defined within **Section 7.1, Chapter 7** of the ES (**Examination Library Reference APP-044**). This description of the topic is an appropriate basis upon which to produce the ES Chapter.

Legislation, Policy Context, Guidance and Standards

2.3.22.2.2 The policy context, legislation, guidance and standards considered in the assessment of Air Quality are noted in **Chapter 2** of the ES and **Section 7.2, Chapter 7** of the ES (**Examination Library Reference APP-044**).

2.3.32.2.3 The policy context, legislation, guidance and standards considered to inform the Air Quality assessment are appropriate.

Consultation

2.3.42.2.4 Consultation undertaken with regards to Air Quality is summarised in **Section 7.3, Chapter 7** of the ES (**Examination Library Reference APP-044**).

2.3.52.2.5 The summary of consultation presented is correct so far as it provides an accurate record of consultation with the GLA on Air Quality to date.

Reasonable Worst Case Parameters Used for Assessment

2.3.62.2.6 The methodology for Air Quality is presented in **Section 7.5, Chapter 7** of the ES (**Examination Library Reference APP-044**). The assessment methodology is considered appropriate.

2.3.72.2.7 The cumulative assessment methodology for Air Quality is presented in **Section 4.10, Chapter 4** of the ES (**Examination Library Reference APP-041**). The cumulative assessment methodology is considered appropriate.

Assumptions and Limitations

2.3.82.2.8 Assumptions made with regards to Air Quality are summarised in **Section 7.6, Chapter 7** of the ES (**Examination Library Reference APP-044**).

2.3.92.2.9 The assumptions presented are considered appropriate.

Baseline Conditions and Receptors

2.3.102.2.10 The baseline conditions and receptors for Air Quality are presented in **Section 7.7, Chapter 7** of the ES (**Examination Library Reference APP-044**).

2.3.112.2.11 The baseline conditions and receptors presented are considered appropriate.

Commented [VH16]: Not agreed. We did not comment on the EIA scope

Embedded Mitigation

2.3.122.2.12 The embedded mitigation which is those designed to be an inherent part of the scheme for which development consent is sought or those which would be undertaken to meet existing legislative requirements for potential Air Quality effects is set out in **Section 7.8, Chapter 7** of the ES (**Examination Library Reference APP-044**).

Commented [VH17]: Not agreed

2.3.132.2.13 The embedded mitigation is considered appropriate and adequate, in terms of their nature and scale, to address potential Air Quality effects.

Commented [VH18]: Not agreed

Assessment of Likely Effects

[2.3.142.2.14](#) The assessment of effects during construction and decommissioning for Air Quality is presented in **Section 7.9, Chapter 7** of the ES (**Examination Library Reference APP-044**). The assessment of effects during construction and decommissioning presented is considered appropriate.

Commented [VH19]: Not agreed.

[2.3.152.2.15](#) The assessment of effects during operation for Air Quality is presented in **Section 7.9, Chapter 7** of the ES (**Examination Library Reference APP-044**). The assessment of effects during operation presented is considered appropriate.

Commented [VH20]: Not agreed.

Cumulative Assessment

[2.3.162.2.16](#) The assessment of cumulative effects for Air Quality is presented in **Section 7.10, Chapter 7** of the ES (**Examination Library Reference APP-044**).

[2.3.172.2.17](#) The cumulative effects presented are considered appropriate.

Commented [VH21]: Not agreed.

Further Mitigation and Enhancement

[2.3.182.2.18](#) The consideration of further mitigation and enhancement measures for Air Quality are presented in **Section 7.11, Chapter 7** of the ES (**Examination Library Reference APP-044**). No further mitigation and enhancement has been identified.

[2.3.192.2.19](#) The consideration of further mitigation and enhancement measures are appropriate and it is agreed that no further mitigation and enhancement measures are required.

Commented [VH22]: Not agreed.

Residual Effects and Monitoring

[2.3.202.2.20](#) The summary of residual effects for Air Quality is presented in **Section 7.12, Chapter 7** of the ES (**Examination Library Reference APP-044**).

[2.3.212.2.21](#) A schedule of mitigation and monitoring is presented in **Chapter 17** of the ES (**Examination Library Reference APP-054**).

[2.3.222.2.22](#) The summary of residual effects is agreed and the monitoring is appropriate.

Commented [VH23]: Not agreed.

2.4.2.3 Waste Management

2.4.12.3.1 In regard to waste management policy it is agreed that:

Operating Capacity

2.4.22.3.2 As recognised in London Environment Strategy (LES), "although waste to landfill has declined by 70 per cent since 2005, London still landfills around 1 million tonnes of waste each year, costing around £100 million" (page 325). Furthermore, only two of the eight landfill sites commonly used to dispose of London's waste are expected to remain open beyond 2025 and no new capacity is planned.

2.4.32.3.3 Operating capacity is that which is already operating or which can be reasonably expected to do so, i.e. the North London Heat and Power Project (NLHPP).

2.4.42.3.4 The operating capacity within London identified in Annex A of the Project and its Benefits Report (PBR) (**Examination Library Reference APP-103**) is reasonable when assumed to be a permitted capacity of 2,248,000 tonnes (the GLA modelling concludes 2,223,000 tonnes). The operating capacity reported in Annex A of the PBR is derived from the following facilities:

- NLHPP at 700,000;
- South East London Combined Heat and Power Energy Recovery Facility (SELCHP) at 488,000;
- RRRF at 785,000; and
- Beddington ERF at 275,000

2.3.5 The GLA uses modelling figures that show SELCHP has an operating capacity of 455,000 (30,000 tonnes less than the permitted capacity recorded in Annex A to the PBR). Since preparation of Annex A, the EP for the Beddington ERF has been increased to a maximum of 302,500 (27,000 tonnes more than recorded in Annex A of the PBR). The Beddington ERF has only just commenced operating and so its functional operational capacity is yet to be seen.

2.4.52.3.6 The operating capacity contracted to London's waste but operating beyond London as identified in Annex A of the PBR (**Examination Library Reference APP-103**) is reasonable when assumed to be a permitted capacity of 390,000 tonnes. This is derived from the following facilities:

- Lakeside ERF at 90,000; and
- SERC at 300,000.

2.4.62.3.7 It is reasonable to consider these operating capacities separately in seeking to understand London's ability to meet net self-sufficiency policy targets.

2.4.72.3.8 The Lakeside ERF can be assumed to cease operating by 2025 due to the proposal for the Heathrow Northwest Runway.

- The loss of the Lakeside ERF would reduce the recovery capacity currently used by London under a LACW contract by 90,000.
- The loss of the Lakeside ERF to London could be greater, as the EA waste datasets advise that in 2016, the facility took 162,628 tonnes of waste from London, increasing to 183,894 in 2017.

Commented [DS24]: Mostly agree. This section should also confirm the source of the waste to be treated.

Commented [NM25R24]: As previously discussed, this is a merchant facility and it will not be possible to confirm the specific source of waste. London currently exports waste for both recovery and landfill. REP will be an important role in London achieving the Mayor's net self-sufficiency. REP's location on the edge of London and adjacent to the River, means it can, and could play an important role in serving both London and the surrounding administrative areas in achieving the waste hierarchy. Text along this line can be added if required. Doug to confirm

Commented [DS26R24]: The SOCG should give indication of where waste will come from (inside/outside London) and quantum. Without this info its difficult to undertake a complete Environmental Statement and understand the impacts

Commented [VH27]: Doug – is this definitely our definition? I thought it was to do with the average of 3 years operational capacity.

Commented [DS28]: Our modelling has this figure at 2,223,000

Commented [KB29R28]: Suggest we amend the wording slightly. I don't think the ExA is going to be too worried about 25,000 tonnes)

Commented [VH30R28]: Not agreed. Our modelling is 2,223,000.

Commented [DS31]: This is the permitted capacity. Our modelling figures show 455,000 tonnes per annum. The last 3 years of operational capacity returns suggest closer to this figure

Commented [KB32R31]: Again, I suggest a small edit to the SoCG wording as the EP for Beddington seems to have increased since we prepared the LWSA, but they cancel each other out

Commented [DS33R31]: ?

Commented [VH34]: Doug – do we agree?

Commented [VH35]: Doug – as above, do we agree here?

Commented [DS36]: It shouldn't be assumed as is on-going. We understand that plans are in place to replace this capacity on a like for like basis – so no overall loss in EFW capacity is expected. See <http://www.grundon.com/Blog/New-site-identified-for-Lakeside-Energy-from-Waste>

Commented [KB37R36]: This project is yet to gain consent and be built so cannot be relied upon. If the GLA do not agree this point then it needs to go into the 'not agreed' section with both their comment and our response set out. Doug please can you confirm?

Commented [DS38R36]: Not agreed

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London's Waste Strategy

[2.4.82.3.9](#) London's Waste Strategy is represented by the development plan policies set out in aLP and dLP.

[2.4.92.3.10](#) The LES is also relevant to consider recognising that it is not development plan policy.

[2.4.102.3.11](#) The evidence base to the LES reports a WRAP study that concludes that the highest performing combination scenario of recycling options through household collection services only considered in London would achieve a 42% household waste recycling rate by 2022.

[2.4.112.3.12](#) The evidence base to the LES reports a 7.8% gap in meeting LACW recycling targets.

The aLP

[2.4.122.3.13](#) Key policies in relation to the waste management element of REP are:

- Policy 5.16; and
- Policy 5.17 and 5.18

[2.4.132.3.14](#) Table 5.2 presents projected household and commercial/industrial waste arisings from 2016 to 2036. Prior to the dLP being adopted, this is the appropriate set of baseline arisings to use as the starting point in considering future need requirements.

The dLP

[2.4.142.3.15](#) Key policies in relation to the waste management element of REP are:

- Policy S17;
- Policy S18; and
- Policy S19

[2.4.152.3.16](#) Appendix A to the document reporting Task 3 – Strategic Waste Data (the Task 3 Report) presents the evidence base (forecast arisings and recycling proportions) used for the dLP and on adoption of the dLP would be the appropriate set of baseline arisings to use as the starting point in considering future need requirements.

Commented [DS39]: As before, append all references to Policy

Commented [KB40R39]: Response as above

Commented [DS41]: Should include related London Plan Energy policies too

Commented [KB42R41]: Whilst REP is an energy generating station and consequently subject to energy policies, this section is focussed on the waste element of the project.

Commented [DS43]: This may get updated following the LP Examination in Public

Commented [KB44R43]: Noted, but we have to work on what is in the public domain now

2-5.2.4 Energy and Heat Off Take

2-5.12.4.1 In regard to energy policy and heat off take, the GLA agrees that:

2-5.22.4.2 Policy 5.17 of the London Plan states that proposals for waste management plants generating energy from waste will need to meet or demonstrate that steps are in place to meet a carbon intensity floor (CIF) of 400 grams of CO₂eq per kWh of energy produced. Policy S18 of the draft London Plan uses similar wording.

2-5.32.4.3 The CIF is a threshold which simply needs to be met as a minimum. The GLA will review the CIF level before 2025 with a view to tightening it to around 300 grams, which all new and existing EFW facilities would be expected to meet.

2-5.42.4.4 The GLA ready reckoner tool can be used to evaluate proposals against the carbon intensity floor. This tool gives the following results when based on the gross and net calorific value of the fuel:

Table 2.1: Carbon Intensity Floor Calculations

Gross	Net
466 g CO ₂ eq/kWh with no heat export.	393 g CO ₂ eq/kWh with no heat export.
451 g CO ₂ eq/kWh with 3 MWth to the on-site Anaerobic Digestion facility	380 g CO ₂ eq/kWh with 3 MWth to the on-site Anaerobic Digestion facility.
344 gCO ₂ eq/kWh with export of 30 MWth to district heating.	290 g CO ₂ eq/kWh with export of 30 MWth to district heating.
336 g CO ₂ eq/kWh with export of 30 MWth to district heating and 3 MWth to the on-site Anaerobic Digestion facility.	283 g CO ₂ eq/kWh with export of 30 MWth to district heating and 3 MWth to the on-site Anaerobic Digestion facility.

2-5.12.4.1 There is evidence that the ready reckoner tool was intended to be based on net calorific value. The waste component characteristics section of the ready reckoner tool refers to the net

Commented [NM45]: Awaiting Confirmation from Eunomia on the model and will update accordingly

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Commented [DS46]: Table to be updated following Cory using the correct version of the tool, where the performance of the EFW and AD facilities are reported separately instead of combined

Commented [NM47R46]: Awaiting clarifications from Eunomia

Commented [DS48R46]: What are you waiting for?

Commented [VH49R46]: Points not agreed.

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calorific value and there are no visible calculations in the tool which convert this to a gross calorific value.

[2.5.22.4.2](#) The original work carried out to develop the CIF (Development of a Greenhouse Gas Emissions Performance Standard for London's Municipal Waste: Revised Appendices, June 2011) specifically uses net calorific value data, taken from WRATE. (See section A.4.3 of this document).

[2.5.32.4.3](#) The CIF calculations for the North London Heat and Power Project, which has now received a DCO, and the Beddington ERF plant used net calorific value.

[2.5.42.4.4](#) Paragraph 5.85A of the London Plan states that waste to energy facilities should be equipped with a heat off-take from the outset. Paragraph 9.8.11 of the draft London Plan agrees. REP meets this requirement.

[2.5.52.4.5](#) Paragraph 5.85A of the London Plan states that it should be demonstrated that capacity of the heat off-take meets the carbon intensity floor at 100% heat supply. Paragraph 9.8.11 of the draft London Plan agrees. REP meets this requirement as demonstrated above.

[2.5.62.4.6](#) Paragraph 5.85B of the London Plan gives examples of demonstrable steps, including:

- a. a commitment (via a Section 106 obligation) to deliver the necessary means for infrastructure to meet the min CO2 standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency;
- b. an agreed timeframe (via a S106) as to when proposed measures will be delivered;
- c. the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority.

[2.5.72.4.7](#) Paragraph 9.8.13 of the draft London plan includes these three examples and adds a fourth:

- d. a commitment to source truly residual waste – waste with as little recyclable material as possible.

[2.5.82.4.8](#) REP meets the requirements of the London Plan and the draft London Plan related to the carbon intensity floor. Furthermore, The CHP connection would deliver additional scheme benefits; REP would already exceed the high-efficiency cogeneration threshold for delivering primary energy savings when operating in fully condensing (electricity only) mode. However, with the inclusion of heat export the Proposed Development would qualify as a high efficiency cogeneration operation, exceeding the Primary Energy Savings threshold and meeting the GLA's Carbon Intensity Floor target when operating in CHP mode.

Commented [DS50]: Has this point been cleared up now? The London Environment Strategy and relevant reference documents set out the current CIF methodology narrative + Ready Reckoner tool to be used.

Commented [DS51]: Peter to review

Commented [DS52]: Not agreed. We have reservations over the claimed efficiency of the proposed ERF

Commented [VH53]: For clarity, rest of para also not agreed

2-6.2.5 Transport

2-6.12.5.1 The scope of the full traffic and transport assessment is presented in **Chapter 6** of the ES (**Examination Library Reference APP-043**) and the Transport Assessment (**Appendix B.1** of the ES, **Examination Library Reference APP-066**). Transport for London are the appropriate party to comment upon transport related matters for London and therefore, all matters related to transport are covered in the SoCG between the Applicant and Transport for London (TfL).

Commented [DS54]: This section should clarify how much waste will be transported along which infrastructure (eg river, road, rail)

Commented [NM55R54]: This can be added in when the SOCG with TFL is finalised, however the point of this paragraph is to defer transport matters to TFL. Please can you agree or disagree to this point.

Commented [DS56R54]: Disagree – the assessment does not take account of secondary impacts as a result of more waste going through Cory's river/road accessed transfer stations. Nor has an assessment been carried out on whether there is sufficient capacity to manage the additional waste

DRAFT

3 ~~Matters yet to be agreed between the Parties~~

3.1 ~~Introduction~~

3.1.1 ~~The Parties confirm that the following areas are under discussion between the Parties:~~

3.2 ~~[Topic/issue 1 yet to be agreed]Principles of Development~~

~~In regard to the Principle of Development it is agreed that:~~

~~As the generating capacity of REP will be in excess of 50 MWe it is classified as a Nationally Significant Infrastructure Project (NSIP) under Sections 14 and 15 of the Act. Therefore, the Application should be determined in accordance with the NPS for EN-1, EN-3 and EN-5 under s104 of the Act.~~

~~The NPSs set a framework making clear that nationally significant infrastructure is required to deliver energy, from a diverse range of sources, and with a focus on renewable/low carbon supply.~~

~~NPS EN-1 paragraph 4.1.5 clarifies that development plan documents and other planning guidance documents may be both important and relevant considerations to SoS decision-making and that REP aligns with these (Appendix A includes a list of relevant policy).~~

~~NPSs establish an urgent need for new energy generation infrastructure of certain types, of which EfWs is one of them and which are governed by EN-3.~~

~~EfW diverts waste from landfill and therefore is higher up the waste hierarchy, which is in accordance with para 2.5.2 of EN-3.~~

~~Secondary to meeting energy needs, is the contribution that such a plant could play in meeting waste management strategies (cross refer to the section below on waste management).~~

~~REP is applying for R1 recovery status and once status is achieved, REP will be classed as a recovery operation.~~

~~The NPSs place no cap on the delivery of new infrastructure for renewable/low carbon infrastructure.~~

~~There is no policy requirement to justify the tonnage for REP (see particularly NPS EN-3, paragraph 2.5.13) or to demonstrate the quantitative or market need for REP (see also NPPW, paragraph 7). The assessment relevant to be undertaken for REP is set out at paragraphs 2.5.66/67 of NPS EN-3, and the Secretary of State should be satisfied in relation to the IPC decision making test set out at paragraph 2.5.70 of NPS EN-3.~~

3.33.1 ~~[Topic/issue 2 yet to be agreed]Performance against the CIF~~

Commented [DS57]: A new section is needed here 'Matters not agreed' and should be the core thrust of the document. The core matters that we don't agree are summarised in our relevant Representation and could be set out here

Commented [VH58R57]: As set out above, given that the majority of matters are not agreed. These headings are misleading.

4 Consultation Log

Commented [NM59]: To be updated when final draft complete.

4.1.1 Key meetings and correspondence that has taken place between the Applicant and the GLA is outlined in the table below:

Table 4.1: Correspondence between the Applicant and GLA

Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
10/03/17	Meeting between GLA and the Applicant	Peter North (GLA); Andy Pike (Cory); Richard Wilkinson (Cory)	Discussed CHP opportunities
07/07/17	Meeting between GLA and the Applicant	Andrew Richmond (GLA)	Supportive of integrated energy park and CHP. Data is limited on C & I waste.
09/07/17	Meeting between GLA and the Applicant	Andrew Richmond (GLA)	
15/01/18	Site Visit between London City Assembly, GLA and the Applicant	Leonie Cooper (London City Assembly); Caroline Russell (London City Assembly); Grace Loseby (GLA)	Visit to Cory's existing RRRF and a presentation from Cory about REP.
07/02/18	Meeting between GLA and the Applicant	Natalie Malettras (PBA); Andy Pike (Cory); Richard Wilkinson (Cory); Devon Christensen (Cory); Andrew Richmond (GLA)	The Applicant provided initial high-level discussions about REP.
07/02/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Andrew Richmond (GLA)	The Applicant provided a link to the Scoping Report, Scoping Opinion and consultation responses received on the dedicated PINS project website. An update on the proposals and Indicative Application Boundary was also provided.
08/02/18	Email correspondence between the Applicant and GLA	Carol Unwin (PBA); Elliot Kemp (GLA)	Requested comments on the proposed viewpoints for the TVIA. Links to the EIA Scoping Report and Scoping Opinion was also included in the email.
09/02/18	Email correspondence between the Applicant and GLA	Devon Christensen (Cory); Andrew Richmond (GLA)	The Applicant issued the minutes from the meeting held on 07/02/18 and attached an indicative timeline for the DCO process. The Applicant also provided links to the EIA Scoping Report and PINS Scoping Opinion.
14/02/18	Email correspondence between the Applicant and GLA	Unan Ejaz (PBA); Stephen Inch (GLA)	PBA air quality team provided links to the EIA Scoping Report and Scoping Opinion. Requested clarity on whether an 'air quality neutral' assessment is required and if the proposed CHP would need to comply with the Mayor's Draft Environmental Strategy policy.
15/02/18	Email correspondence between the Applicant and GLA	Carol Unwin (PBA); Elliot Kemp (GLA)	Requested comments on the proposed viewpoints for the TVIA.
19/02/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Andrew Richmond (GLA)	The Applicant requested an update on who the case officer within the GLA will be for the scheme.

Commented [VH60]: This table is not yet agreed. We need to confirm internally that all meetings happened and also the outcomes.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
19/02/18	Email correspondence between GLA and the Applicant	Elliot Kemp (GLA); Carol Unwin (PBA)	GLA unable to provide comments on TVIA methodology as unsure if the Mayor has a role in responding to the scoping report.
19/02/18	Email correspondence between the Applicant and GLA	Carol Unwin (PBA); Elliot Kemp (GLA)	Requested comments on the proposed viewpoints for the TVIA.
26/02/18	Email correspondence between the Applicant and GLA	Helen Evriviades (PBA); Peter Massini (GLA)	Requested comments on the baseline ecological surveys being proposed, the biodiversity metric methodology and the proposed screening distance in the context of potential air quality impacts upon nearby designated areas. Links to the EIA Scoping Report and Scoping Opinion was also included in the email.
07/03/18	Email correspondence between GLA and the Applicant	Samantha Davenport (GLA); Stephen Inch (GLA); Helen Evriviades (PBA)	GLA provided comments on air quality and ecology assessments.
13/03/18	Telephone correspondence between the Applicant and GLA	Natalie Malettras (PBA); Kate Randell (GLA)	Correspondence confirming GLA have received the Scoping Report.
23/03/18	Letter to the GLA from the Applicant	Paul Watling (GLA); Andy Richmond (GLA); Elliot Kemp (GLA);	The Applicant notified the GLA of important updates to the REP proposals and Indicative Application Boundary and provided a technical note outlining these changes and the amended scope of the EIA.
16/05/18	Telephone correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Discussions regarding the meeting in June (05/06/18)
16/05/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant invited the GLA to visit their existing RRRF site and asked the GLA to provide dates that suited them.
17/05/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed that TfL would attend the meeting held on 05/06/18. GLA's Environment Team requested timescales for receiving technical information about the proposals.
29/05/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting attendees.
29/05/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting attendees. GLA also asked for confirmation on when they should expect to receive technical information about the proposals.
31/05/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA requesting an indication of when they would receive technical information regarding the proposals.
31/05/18	Email correspondence between the	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant provided a link to the REP project website which allowed the GLA to access the non-statutory consultation material which included technical details about the scheme.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
	Applicant and GLA		The Applicant explained that PEIR would be published on 18/06/18 at the start of the statutory consultation period and the PEIR would provide more information about the scheme and the preliminary environmental assessments.
04/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting agenda for the meeting held on 05/06/18
04/06/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	The GLA issued the meeting agenda the meeting held on 05/06/18
04/06/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	The GLA re-issued the meeting agenda the meeting held on 05/06/18
05/06/18	Meeting between GLA and the Applicant	Natalie Malettras (PBA); Richard Wilkinson (Cory); Devon Christensen (Cory); Roby Gully (Cory), Vanessa Harrison (GLA), Katherine Wood (GLA), Ioanna Mytilinaiou (GLA); Victoria Rees (TfL)	Pre-planning application meeting with high level discussions on the proposals
12/06/18	Applicant issued s42 letter and statutory consultation documents to GLA	Vanessa Harrison (GLA)	The Applicant provided: <ul style="list-style-type: none"> • Copy of a notice pursuant to section 48 of the PA 2008 and Regulation 13 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 • Copy of the PEIR NTS • USB drive containing an electronic copy of the PEIR and its technical appendices
12/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued meeting notes and actions from the meeting held on 05/06/18 and asked the GLA to provide dates to visit the Applicant's existing RRRF site.
13/06/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of the Applicant's statutory consultation documents and provided dates for proposed site visit to the REP site and existing RRRF site.
14/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree date for site visit.
14/06/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree date for site visit.
14/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree date for site visit.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
14/06/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree date for site visit.
14/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree date for site visit.
14/06/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree date for site visit and noted the operational status of RRRF site.
15/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant requested confirmation of the fee regime the pre-planning application advice for the scheme.
18/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant requested confirmation of the fee regime the pre-planning application advice for the scheme.
19/06/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA provided comments on meeting notes and actions the Applicant issued on 12/06/18. GLA had no major comments on minutes and asked for emphasis to be placed on the GLA being "interested in avoiding any permeant impacts upon MOL/nature reserve".
19/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree final minutes from meeting held on 05/06/18.
19/06/18	Email correspondence between the Applicant and GLA	Richard Wilkinson (Cory); Vanessa Harrison (GLA)	Correspondence to confirm site visit
19/06/18	Email correspondence between the Applicant and GLA	Vanessa Harrison (GLA); Richard Wilkinson (Cory)	Correspondence to confirm site visit
20/06/18	Site Visit between the GLA and the Applicant	Vanessa Harrison (GLA)	GLA Planning Officer visited the REP site and existing RRRF site.
25/06/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued a technical note which summarised how REP met the adopted and draft London Plan policies.
04/07/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA requested an electronic copy of the PEIR NTS.
04/07/18	Email correspondence between the Applicant and GLA	Sarah Chandler (PBA); Vanessa Harrison (GLA)	The Applicant provided an electronic copy of the PEIR NTS.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
13/07/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Sarah Chandler (PBA)	GLA requested commentary about where the waste for the ERF would be sourced from.
16/07/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Holly Smith (GLA)	<p>Provided a link to the consultation material available during statutory consultation and answered GLA's queries on:</p> <ul style="list-style-type: none"> • Source of additional waste • Transporting waste to the facility • Impacts from the construction of the Electrical Connection route • Timetable for the construction of the Electrical Connection route
19/07/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant provided commentary about where the waste for the ERF would be sourced from and stated that <i>"the energy recovery facility within the proposed Riverside Energy Park (REP) will process non-recyclable (black bag) waste. It would normally treat waste arising from businesses (commercial waste), with the potential to accept waste arising from residents (local authority collected waste)"</i> .
19/07/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of the Applicant's commentary about where the waste for the ERF would be sourced from.
30/07/18	GLA response to s42	Vanessa Harrison (GLA)	<p>GLA set out their views on the principles of the proposal and matters that should be considered in the preparation of the application to PINS.</p> <p>GLA officers noted that they are generally unsupportive of the scheme.</p>
31/07/18	Applicant issued minor refinements consultation documents to GLA	Vanessa Harrison (GLA)	<p>The Applicant provided:</p> <ul style="list-style-type: none"> • A plan showing the additional areas of land • A USB drive containing Supplementary Information to the PEIR
01/08/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Requesting confirmation that the Applicant received the GLA's s42 response.
20/08/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant confirmed receipt of the GLA's s42 response and proposed a strategic call to discuss their response in greater detail and to propose next steps.
24/08/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
24/08/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date and proposed attendees
24/08/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date and proposed attendees
24/08/18	Email correspondence between the	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting logistics.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
	Applicant and GLA		
24/08/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics.
24/08/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date and logistics.
24/08/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
24/08/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics.
04/09/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics.
05/09/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics and agenda.
06/09/18	The Applicant's comments on the GLA's s42 response (in accordance with s49 of the PA 2008)	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued a summary table of their responses to the GLA's s42 response, an Air Quality Technical Note and Waste Capacity Technical Note.
10/09/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting agenda for the meeting held on 11/09/18
10/09/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting agenda for the meeting held on 11/09/18
10/09/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to confirm attendees for the meeting held on 11/09/18
10/09/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to confirm attendees for the meeting held on 11/09/18
11/09/18	Meeting between GLA and the Applicant	Natalie Malettras (PBA); Kirsten Berry (PBA); Graham Harker (PBA); Richard Wilkinson (Cory); Stephen Othen (Fichtner); Doug Simpson (GLA); Peter North (GLA); Stephen Inch (GLA); Patrick Feehily (GLA);	<p>Project update meeting. Key discussions were focused around the GLA's s42 response, the Applicant's 'Waste Capacity Note' issued in response to the GLA's s42 response, waste policy, principles of energy from waste, carbon intensity floor thresholds, exploring heat opportunities and air quality.</p> <p>GLA agreed to circulate the waste capacity models that were used in the preparation of the London Environment Strategy.</p>

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Statement of Common Ground between the Applicant and Greater London Authority

Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
		Vanessa Harrison (GLA)	GLA agreed to confirm the basis of the heat and power efficiency inputs in the CIF model. GLA agreed to come back to the Applicant with comments on responses provided by other EIA disciplines and to confirm the timetable of the London Plan examination.
12/09/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting minutes. The Applicant requested information about the waste capacity models that were used in the preparation of the London Environment Strategy and CIF modelling.
17/09/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued minutes and actions from meeting held on 11/09/18.
19/09/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of minutes and actions for their review. GLA also requested additional information on SoCG programme.
19/09/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant stated they would provide additional information regarding the SoCG.
24/09/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed they would look into the CIF modelling and send information across.
26/09/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA explained they were still working on the CIF modelling. GLA requested updated project timetable and information on the SoCG programme.
26/09/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant asked GLA to confirm they have no further additions to the minutes issued on 17/09/18 and confirmed they would issue an updated project programme over.
26/09/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA stated they would chase comments on the minutes issued on 17/09/18 and requested a high-level timetable for the DCO.
28/09/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed they have issued the Applicant's summary table of their responses to the GLA's s42 response to relevant teams for comment. GLA confirmed the London Plan timetable.
02/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Patrick Feehily (GLA); Doug Simpson (GLA)	The Applicant chased the GLA for a response to the agreed actions from the meeting on 11/09/18. Information was expected w/c 24 th September.
02/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued an updated project timetable to the GLA and provided information on the preparation of SoCGs. The Applicant also asked for an update on when the information about the provision of waste capacity models and CIF would be issued.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
03/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	<p>GLA provided comments on the waste sections of the meeting minutes issued on 17/09/18 and stated energy and air quality colleagues may want to comment on these minutes.</p> <p>GLA provided confirmation on CIF calculation methodology and stated that the Applicant should be using the gross energy efficiency numbers.</p> <p>GLA stated they would issue information on the waste capacity number once they have approval from the Mayor's Office.</p> <p>GLA also requested confirmation on the submission date of the application, what information the Applicant requires from the GLA and reason for this and the deadlines for the SoCG.</p>
04/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Doug Simpson (GLA)	<p>Correspondence responding to the GLA's comments from 03/10/18.</p> <p>The Applicant explained that the outstanding query and action related to confirming whether the Applicant should use net or gross for the CV input into the CIF and requested confirmation.</p> <p>The Applicant stated the submission of the Application would be mid-November but an exact date could not be confirmed.</p> <p>The Applicant provided an update on the SoCG programme.</p>
04/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA asked for a call with the Applicant on 05/10/18.
04/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Doug Simpson (GLA)	Correspondence arranging a conference call.
05/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Doug Simpson (GLA)	Correspondence arranging a conference call.
05/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	Correspondence arranging a conference call.
05/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Doug Simpson (GLA)	Correspondence arranging a conference call.
05/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	Correspondence arranging a conference call.
05/10/18	Telephone correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	Discussions regarding content of Consultation Report and CIF calculations.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
05/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA queried if the consultation process.
09/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant requested confirmation on when they would receive the information regarding the provision of waste capacity models and CIF. The Applicant also provided clarity on the consultation process and outlined the purpose and content of the Consultation Report and provided the GLA with links to PINS Advice Notes.
09/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed the Applicant should apply the gross CV for the CIF calculation.
10/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA requested a copy of the Applicant's response to the GLA's s42 response in Microsoft word format.
10/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant issued a copy of the Applicant's response to the GLA's s42 response in Microsoft word format.
11/10/18	Email correspondence between the GLA and the Applicant	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of the Applicant's response to the GLA's s42 response
17/10/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA) and Doug Simpson (GLA)	The Applicant requested an update on the remaining information yet to be received by the GLA – notably confirmation on the provision of the GLA's waste capacity models.
18/10/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Doug Simpson (GLA); Natalie Malettras (PBA)	GLA stated they were still drafting information that the Applicant requested. The GLA also provided several links relating to EFW capacity need in London and the modelling rationale for the estimates.
09/11/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA provided responses to the Air Quality Technical Note and Waste Capacity Technical Note the Applicant issued and provided comments on transport issues raised by TfL.
19/11/18	Meeting between the Applicant and GLA		High level meeting with senior members of staff regarding principle of development.
28/11/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant informed the GLA that the Application was submitted to PINS and wanted to progress with the SoCG.
28/11/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence relating to the SoCG.
28/11/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA requested updated timescales for the DCO going forward and to include key dates for SoCG and LIR.
28/11/18	Email correspondence between the	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant re-issued an updated project timetable to the GLA and provided information on the preparation of SoCGs (previous email issued

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
	Applicant and GLA		02/10/18). The Applicant also requested a conference call for 29/11/18.
29/11/18	Email correspondence between the GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of updated project timetable.
30/11/18	Telephone correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Discussions regarding key project milestones post-acceptance.
30/11/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant proposed another meeting to discuss the submitted Application and the preparation of the SoCG.
10/12/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
11/12/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
11/12/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
13/12/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
19/12/18	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
19/12/18	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
07/01/19	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
08/01/19	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date. GLA proposed to have separate meetings to discuss energy/waste and air quality.
08/01/19	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting dates for separate energy/waste and air quality meetings.
11/01/19	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
11/01/19	Email correspondence	Natalie Malettras (PBA);	Correspondence to agree meeting date.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
	between the Applicant and GLA	Vanessa Harrison (GLA)	
14/01/19	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant requested an update on the proposed meeting dates.
14/01/19	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
15/01/19	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date – the Applicant recommended to meet prior to the Section 56 Relevant Representations deadline (12/02/19) to discuss and answer queries the GLA had on the Application prior to making their Relevant Representation. The Applicant also offered a meeting room at their facility and stated they would make arrangements to rent a room closer to City Hall if the date of the proposed meetings could be moved forward.
16/01/19	Email correspondence between GLA and the Applicant	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
16/01/19	Email correspondence between the Applicant and GLA	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.

5 Confirmation of Agreement

This SOCG is prepared jointly and agreed by the Parties:

Signed for and on behalf of the Applicant

Date:

Signed for and on behalf of Greater London Authority

Date:

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Appendix A Legislation and Policies Relevant to the Proposed Development

Table A.1: Legislation and Policies Relevant to the Proposed Development

Type	Policy/Legislation/Guidance
Legislation	a) European Directives: <ul style="list-style-type: none"> – EIA Directive (2011/92/EU) (as amended by EIA Directive 2014/52/EU) – Habitats Directive (92/43/EEC) – Landfill Directive (1999/31/EC) – Waste Framework Directive (2008/98/EC) – Waste Incineration Directive (2010/75/EU) – Energy Efficiency Directive (2012/27/EU) – Air Quality Directive (2008/50/EC) – Industrial Emissions Directive (2010/75/EU) – Birds Directive (2009/147/EC) – Medium Combustion Plant Directive (2015/2193/EU) – Environmental Liability Directive (2004/35/EC)
	b) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('Infrastructure EIA Regulations 2017')
	c) The Infrastructure Planning (Applications Prescribed Forms and Procedure) Regulations 2009 ('APFP Regulations') (as amended)
	d) The Localism Act 2011 (as amended)
	e) Air Quality (England) Regulations 2000
	f) Air Quality (Amendment) (England) Regulations 2002
	g) Control of Pollution Act 1974 (COPA)
	h) Environmental Protection Act 1990
	i) Conservation of Habitats and Species Regulations 2017
	j) Wildlife and Countryside Act 1981 (as amended)
	k) The Natural Environment and Rural Communities Act 2006 ('NERC')
	l) Flood and Water Management Act 2010
	m) Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
	n) The Environmental Permitting (England and Wales) Regulations 2016
	o) The Water Resources Act 1991
	p) The Land Drainage Act 1991

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Type	Policy/Legislation/Guidance
	q) Water Act 2003
National Planning Policy, & Guidance	<ul style="list-style-type: none"> a) Overarching National Policy Statement for Energy (EN-1) (2011) ('NPS EN-1') b) National Policy Statement for Renewable Energy Infrastructure (EN-3) (2011) ('NPS EN-3') c) National Policy Statement for Electricity Networks Infrastructure (EN-5) (2011) ('NPS EN-5') d) National Planning Policy Framework ('NPPF') (2018) e) National Planning Policy for Waste ('NPPW') (2014) f) Planning Practice Guidance ('PPG') (online resource)
London Policy, Guidance & Strategies	<ul style="list-style-type: none"> a) The London Plan (2016) b) London Environment Strategy (2018) ('LEnvS') c) Mayor's Transport Strategy (2018) ('MTS') d) London Riverside Opportunity Area Planning Framework (2015) ('London Riverside OAPF') e) London Plan: The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance ('SPG') (2014) f) London Plan: Shaping Neighbourhoods: Character and Context SPG (2014) g) London Plan: Sustainable Design and Construction SPG (2014) h) London Plan: London View Management Framework (LVMF) (2012) i) London's Wasted Resource: The Mayor's Municipal Waste Management Strategy (2011) ('MMWMS') j) Managing risks and increasing resilience: The Mayor's Climate Change Adaptation Strategy (2011) k) Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy (2011) l) Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2011) m) Draft London Plan showing Minor Suggested Changes (2018) n) The Mayor's Draft Economic Development Strategy for London (2017)
Local Policy, Guidance & Strategies	<ul style="list-style-type: none"> a) Bexley Core Strategy (2012) b) Bexley Unitary Development Plan ('UDP') (2004) Saved Policies (2012) c) Bexley Energy Masterplan (2016) d) Bexley Growth Strategy (2017) e) Dartford Core Strategy (2011) f) Dartford Development Policies Plan and Policies Map (2017) g) Kent Minerals and Waste Local Plan 2013-2030 (2016) h) Kent Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 i) Thamesmead and Abbey Wood Supplementary Planning Document (SPD) (2009)

Appendix B Revision 3 of the draft SOCG



now part of



Riverside Energy Park Belvedere

Statement of Common Ground between the Applicant and Greater London Authority

Planning Inspectorate Reference: EN010093

[Date]

Revision	Date	Description
DRAFT	31/01/2019	Draft for Discussion
R1	04/03/2019	Draft following removal of some detailed policy references as following conversation with GLA
R2	02/04/2019	Draft following comments from GLA (received 29 th March 2019)
R3	19/08/2019	Draft following comments from GLA (received 8 th and 17 th May 2019) for discussion at meeting scheduled on 21 st August 2019

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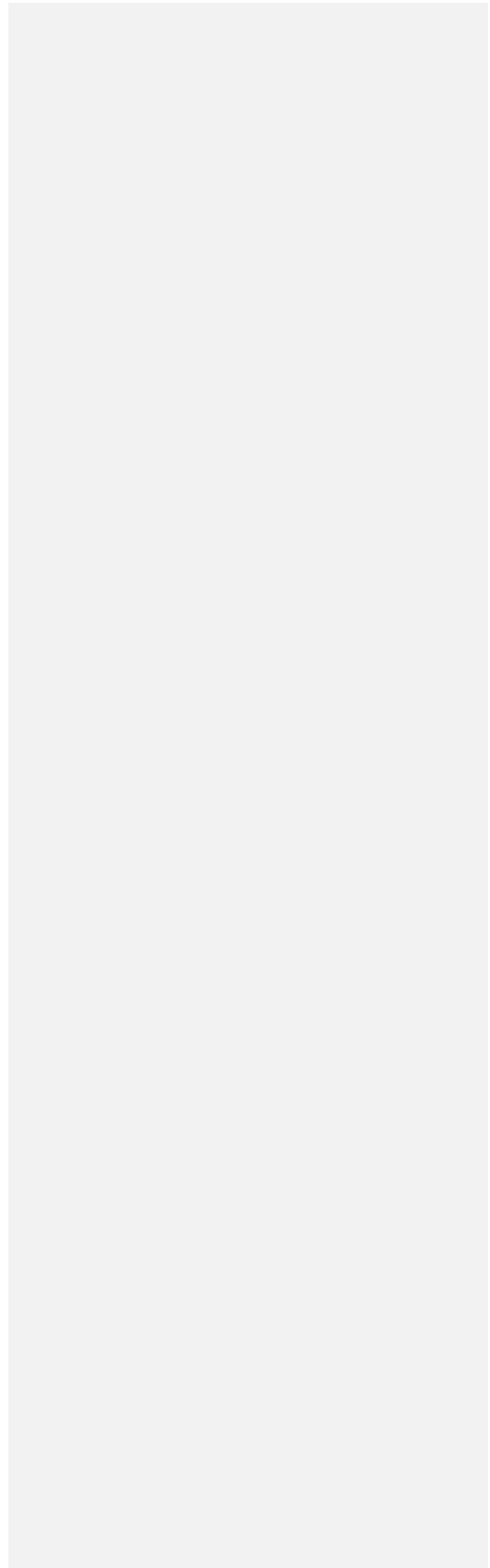
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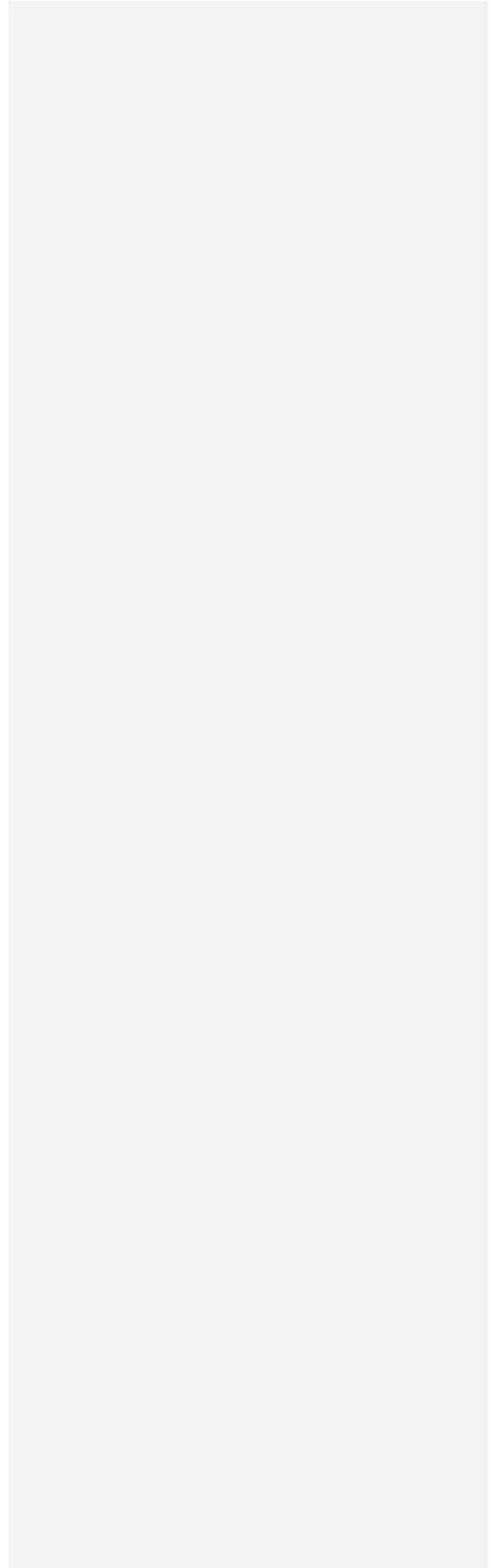
Appendices

- Appendix A Consultation Log
- Appendix B Legislation and Policies Relevant to the Proposed Development
- Appendix C Approval Letter from the EA

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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')), in collaboration with the Greater London Authority ('GLA'). For the purposes of this SOCG, the Applicant and the Greater London Authority 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 (the 'Act') for powers to construct, operate and maintain an integrated Energy Park, to be known as Riverside Energy Park (REP) ('the Application'). 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, and principally areas where disagreement remain, about the Application to provide information to facilitate an efficient examination process.
- 1.1.4 This SOCG relates to the following topics/issues:
- Principle of the Proposed Development – planning policy applicable to the Proposed Development;
 - Scope of EIA;
 - Waste Management;
 - Air Quality;
 - Energy and Heat Off Take; and
 - Draft Development Consent Order.
- 1.1.5 Issues relating to Transport will be covered within the SOCG with Transport for London (TfL) which is being progressed between the Applicant and TfL. A draft SOCG between the Applicant and TfL was submitted at Deadline 5 (**8.01.10, REP5-012**).
- 1.1.6 Overall, this SOCG is intended to give a clear position of the state and extent of agreement and disagreement between the Parties at the date on which this SOCG is signed and submitted to the Secretary of State.
- 1.1.7 All defined terms and abbreviations, if not defined or explained in this SOCG are defined or explained in the **Project Glossary (1.6, APP-006)**.

1.2 The Application

- 1.2.1 The 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).

1.3 The Examination

- 1.3.1 An examination ('the Examination') of the Application is currently being held pursuant to Chapter 4 of Part 6 of the Act and the Infrastructure Planning (Examination Procedures) Rules 2010 ('the EP Rules').
- 1.3.2 A Preliminary Meeting, pursuant to Rule 7 of the EP Rules, was held on 10th April 2019, following which the Examination commenced, with the Issue Specific Hearing on Environmental matters held on 5th June 2019 and Issue Specific Hearing on the dDCO held on 6th June 2019.
- 1.3.3 Subsequent Hearings and submission deadlines are set out in the PINS Examination timetable with the Examination due to close on 09 October 2019. The Examining Authority ('the ExA') in its letter pursuant to Rule 8 of the EP Rules, has requested that SoCGs are prepared and submitted between the Applicant and any relevant Interested Parties.

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. It is agreed that **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 Riverside Resource Recovery Facility (RRRF), within the London Borough of Bexley (LBB). 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 REP would be connected to the electricity distribution network via a new 132 kilovolt (kV) underground electricity cable connection. The route options for the Electrical Connection at the time of submission are shown in the **Works Plans (2.2, APP-008)** and were updated to a single route in Revision 1 at Deadline 2 (**2.2, REP2-004**).

Commented [EE1]: VH Comment (15 May 2019): Not agreed, we have concerns regarding the content of the feedstock

Commented [CS2R1]: This section simply provides a description of the Proposed Development as set out in the application. In any event, there is a requirement on waste types.

Commented [EE3]: VH Comment (15 May 2019): We are not part of these discussions so query whether we can comment on this.

Commented [EE4R3]: Noted – section has been updated to reflect the single route change. However, as stated above this text is simply to provide background and context to the document

It is also factual in nature

Statement of Common Ground

Statement of Common Ground between the Applicant and Greater London Authority

- 1.4.4 Further investigatory trial holes in March 2019 informed the selection of a single overall Electrical Connection route, which the Applicant has submitted along with the explanatory report, '**Electrical Connection Progress Report**', at Deadline 2 (**8.02.07, REP2-058**).
- 1.4.5 The Electrical Connection will connect into the existing National Grid Littlebrook substation, south east of the REP site, in Dartford. The Electrical Connection is located within the LBB and Dartford Borough, and would run from a new substation proposed to be constructed within the REP site.

1.5 Consultation

- 1.5.1 Consultation and engagement undertaken with the GLA during the pre-application, pre-examination and examination stages of the Project is summarised in **Appendix A** of this SOCG.
- 1.5.2 It is agreed that **Appendix A** presents an accurate record of meetings, telephone calls and email correspondence between the parties during the pre-application, pre-examination and examination stages.

1.6 Abbreviations used in this document

- The NPSs, meaning NPS EN-1, NPS EN-3 and EN-5;
- NPS EN-1, meaning Overarching National Policy Statement for Energy (EN-1), published July 2011;
- NPS EN-3, meaning National Policy Statement for Renewable Energy Infrastructure (EN-3), published July 2011;
- NPS EN-5, meaning National Policy Statement for Electricity Networks (EN-5), published July 2011;
- aLP, meaning the London Plan, adopted March 2016;
- dLP, meaning Draft New London Plan (Consolidated Suggested Changes Version), published July 2019;
- NPPW, meaning National Planning Policy for Waste, published October 2014;
- LACW, meaning Local Authority Collected Waste; and
- SoS, meaning the Secretary of State for Business, Energy and Industrial Strategy.

2 Matters agreed between the Parties

2.1 Introduction

2.1.1 This section sets out matters agreed between the Parties:

2.2 Principle of Proposed Development

- As the generating capacity of REP will be in excess of 50 MWe it is classified as a Nationally Significant Infrastructure Project (NSIP) under Sections 14 and 15 of the Act. Therefore, the Application should be determined in accordance with the NPS for EN-1, EN-3 and EN-5 under s104 of the Act.
- The NPSs set a framework making clear that nationally significant infrastructure is required to deliver energy, from a diverse range of sources, and with a focus on renewable/low carbon supply.
- NPS EN-1 paragraph 4.1.5 clarifies that development plan documents and other planning guidance documents may be both important and relevant considerations to SoS decision-making and that REP aligns with these (**Appendix B** includes a list of relevant policy).
- NPSs establish an urgent need for new energy generation infrastructure of certain types, of which EfWs is one of them and which are governed by EN-3.
- EfW diverts waste from landfill and therefore is higher up the waste hierarchy, which is in accordance with para 2.5.2 of EN-3.
- Secondary to meeting energy needs, is the contribution that such a plant could play in meeting waste management strategies.
- REP has been preliminary certified by the Environment Agency as a recovery operation based on design data (see **Appendix C**). R1 status will be verified during the operational stage when performance data is available.
- The NPSs place no cap on the delivery of new infrastructure for renewable/low carbon infrastructure.
- The EA is the competent authority for permitting and regulating waste treatment facilities.
- The throughput cap on the existing RRRF will not be shared with the ERF at REP.
- The vehicle movement cap on the existing RRRF will not be shared with the ERF at REP.

2.2.1 There is no policy requirement to justify the tonnage for REP (see particularly NPS EN-3, paragraph 2.5.13) or to demonstrate the quantitative or market need for REP (see also NPPW, paragraph 7). The assessment relevant to be undertaken for REP is set out at paragraphs 2.5.66/67 of NPS EN-3, and the Secretary of State should be satisfied in relation to the decision-making test set out at paragraph 2.5.70 of NPS EN-3.

2.3 Scope of the EIA

2.3.1 It is agreed that the ES forms the full and complete Environmental Impact Assessment (EIA) for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') with the exception of any matters not agreed which are detailed in **Section 3** of this SOCG. It is further agreed that the ES contains sufficient environmental information to enable the Secretary of State to make his determination.

Commented [EE5]: VH Comment (15 May 2019): Given that we are not agreed on any of the matters within these section, suggest that is retitled, and it is ordered through topics instead, with comments on agreement/disagreement made throughout. Two sections entitled 'Matters agreed' and 'Matters not agreed' is misleading and impacts clarity

Commented [CS6R5]: The purpose of the document is to provide the ExA with a clear understanding of the matters agreed and those not agreed. This structure allows specific areas of disagreement to be separated out rather than wholesale sections (unless a subject/topic area is disagreed in its entirety).

Commented [DS7]: Remove. The purpose of this doc is not to agree what's in national policy or how to interpret. Suggest appending all relevant policies as they are written for use as a handy reference library

Commented [CS8R7]: Comment for GLA: Agreement (or disagreement) on these statements is an important element of the SOCG. We have sought to set out points of disagreement on principle of the development in new section 3.2 below.

If the GLA does not agree with any of these statements please set out clearly why in the Section 3.2 table.

Commented [EE9]: VH Comment (15 May 2019): This is not agreed, and we were not asked to comment on scope.

Commented [EE10R9]: GLA were consulted on the scope of the EIA and the Applicant has responded to this point in Section 3.3.

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2.3.2 The GLA makes no comment in respect of all other topics identified in the ES (6.1, APP-038 – APP-100 and REP2-013-REP2-041), Habitats Regulations No Significant Effects Report (6.5, REP2-042). and other Application documents, except from those matters set out in Section 3 of this SOCG.

2.4 Benefits of the Proposed Development

2.4.1 It is agreed that the Proposed Development would create the following economic, societal and environmental benefits:

- Contribute towards delivering new renewable/low carbon electricity supply and storage, as established in NPS EN-1, by integrating the ERF with the Anaerobic Digestion facility, solar and battery storage;
- Deliver flexible, decentralised, renewable/low carbon, secure and reliable electricity supply, which will assist in reducing the percentage of London's electricity demand that is sourced from outside the Capital;
- Deliver battery storage that will improve the resilience of London's and the UK's electrical supply. Battery storage is a new technology and REP actively supports this growth sector;
- Proposed solar PV will contribute a small but welcome quantity of new solar generation capacity set out in the London Environment Strategy;
- Provide substantial private investment in sustainable waste management by diverting waste from landfill;
- The location of the Proposed Development meets the criteria for Policy 5.17 of the Adopted London Plan with regard to the proposed Anaerobic Digestion facility, which is expected to contribute to a positive carbon outcome; and
- Deliver a diversity of employment opportunities on-site, off-site and throughout the supply chain. The Proposed Development would deliver approximately 837 temporary construction jobs (on an average monthly basis) during the expected construction 43 month period, and in the longer term there are opportunities for 75 permanent full time equivalent (FTE) jobs to be created.

2.5 Waste Management

2.5.1 In regard to waste management policy it is agreed that:

Operating Capacity

2.5.2 As recognised in London Environment Strategy (LES), "although waste to landfill has declined by 70 per cent since 2005, London still landfills around 1 million tonnes of waste each year, costing around £100 million" (page 325). Furthermore, only two of the eight landfill sites commonly used to dispose of London's waste are expected to remain open beyond 2025 and no new capacity is planned.

2.5.3 Operating capacity is that which is already operating or which can be reasonably expected to do so, i.e. the North London Heat and Power Project (NLHPP).

2.5.4 The parties agree that operating recovery facilities, located in London, have a capacity of about 2.2 million tonnes per annum (the GLA identifies 2,223,000 tonnes per annum, the Applicant identifies 2,248,000 tonnes per annum).

2.5.5 The parties also agree that the operating capacity contracted to London's waste but located outside of London is 390,000 tonnes per annum.

Commented [DS11]: Remove. We make comments about economic development in our consultation response.

Commented [NM12R11]: Clarification sent to Doug – no previous comments on economic development and none included within GLA Relevant Representation.

Commented [EE13R11]: VH Comment (15 May 2019): This should be removed regardless as is unnecessary.

Commented [EE14R11]: As per NM's comment to DS above.

Commented [DS15]: Mostly agree. This section should also confirm the source of the waste to be treated.

Commented [NM16R15]: As previously discussed, this is a merchant facility and it will not be possible to confirm the specific source of waste. London currently exports waste for both recovery and landfill. REP will be an important role in London achieving the Mayor's net self-sufficiency. REP's location on the edge of London and adjacent to the River, means it can, and could play an important role in serving both London and the surrounding administrative areas in achieving the waste hierarchy. Text along this line can be added if required. Doug to confirm

Commented [EE17R15]: DS Comment (08 May 2019): The SOCG should give indication of where waste will come from (inside/outside London) and quantum. Without this info its difficult to undertake a complete Environmental Statement and understand the impacts

Commented [CS18R15]: Further information is provided in the Applicant's Examination submissions.

Commented [EE19]: VH Comment (15 May 2019): Doug – is this definitely our definition? I thought it was to do with the average of 3 years operational capacity.

Commented [EE20R19]: GLA to respond.

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- 2.5.6 It is reasonable to consider these operating capacities separately in seeking to understand London's ability to meet net self-sufficiency policy targets.

London's Waste Strategy

- 2.5.7 London's Waste Strategy is represented by the development plan policies set out in aLP and dLP.
- 2.5.8 The LES is also relevant to consider, whilst recognising that it is not development plan policy.
- 2.5.9 The evidence base to the LES reports a WRAP study that concludes that the highest performing combination scenario of recycling options through household collection services only considered in London would achieve a 42% household waste recycling rate by 2022.
- 2.5.10 The evidence base to the LES reports a 7.8% gap in meeting LACW recycling targets.

The aLP

- 2.5.11 REP complies with the following key policies in relation to waste management:

- Policy 5.16;
- Policy 5.17; and
- Policy 5.18

- 2.5.12 Table 5.2 presents projected household and commercial/industrial waste arisings from 2016 to 2036. Prior to the dLP being adopted, this is the appropriate set of baseline arisings to use as the starting point in considering future need requirements.

The dLP

- 2.5.13 REP complies with the following key policies in relation to waste management:

- Policy SI7;
- Policy SI8; and
- Policy SI9

- 2.5.14 Report titled 'London Plan Waste Forecasts and Apportionments, Task 3 – Strategic Waste Data (the Task 3 Report) is a key document within the evidence base to the draft London Plan. Appendix A to the Task 3 Report presents the evidence base (forecast arisings and recycling proportions) used for the dLP and on adoption of the dLP would be the appropriate set of baseline arisings to use as the starting point in considering future need requirements. The Examination Hearings into the draft London Plan have concluded; the Draft London Plan – Consolidated Suggested Changes Version of July 2019 has been published and the Task 3 Report has not been updated.

Forecast waste arisings

- 2.5.15 Appendix A to the Task 3 Report forecasts household waste and commercial and industrial (C&I) waste arisings, for years 2011, 2016, 2021, 2026, 2031 and 2036. These are shown below in **Table 2.1** (rows a and b).

Commented [DS21]: Should include related London Plan Energy policies too

Commented [KB22R21]: Whilst REP is an energy generating station and consequently subject to energy policies, this section is focussed on the waste element of the project.

Commented [DS23]: This may get updated following the LP Examination in Public

Commented [KB24R23]: Text updated

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- 2.5.16 WasteDataFlow records that in 2016/17 a total of 3,697,000 tonnes of Local Authority Collected Waste (LACW) (row d) was generated in London: 3,049,000 of which was household waste (row e); and 648,000 tonnes of which was non-household waste (row f).
- 2.5.17 The difference between the forecast household waste at 2016 and the actual LACW at 2016/17 is 594,000 tonnes (**Table 2.1**, row g).
- 2.5.18 Incorporating the WasteDataFlow information into the Task 3 Report forecasts both updates the forecast waste arisings and results in lower forecasts overall, by 54,000 tonnes (the difference between **Table 2.1**, rows c and j).

Table 2.1: Updating the waste forecasts from Task 3 Report, years 2016, 2026 and 2036

Reference	Description	2016 (million tonnes)	2026 (million tonnes)	2036 (million tonnes)	row
Task 3 Report Table A1	Household waste arisings forecast	3,103	3,287	3,453	a
Task 3 Report Table A3	C&I waste arisings forecast	5,015	5,012	5,097	b
	Total forecast arisings	8,118	8,299	8,550	c
WasteDataFlow 2016/17	Total LACW	3,697			d
	Household	3,049			e
	Non-household	0.648			f
	Difference between forecast household and actual LACW	0.594			g
	Updated LACW forecasts (0.594 added to Task 3 Report)	3,697	3,881	4,047	h
	Updated C&I waste forecasts (0.648 subtracted from Task 3 Report)	4,367	4,364	4,449	i
	Updated total forecast arisings	8,064	8,245	8,496	j

- 2.5.19 The updates presented in **Table 2.1** (rows h, i and j) are also presented within the relevant tables of the **London Waste Strategy Assessment (LWSA) (Annex A of the Project and its Benefits Report) (7.2, APP-103)** (rows a, b and c of: Table 4.3: Scenario 2b, dLP; Table 4.4: Scenario 3a, dLP; Table 4.5: Scenario 3b, dLP; and Table 4.6: Scenario 4, dLP).

Future waste management

- 2.5.20 Draft London Plan (July 2019) policy SI7/A/3a seeks to achieve a minimum level of 65% recycling across municipal waste streams by 2026. Draft London Plan (July 2019) paragraph 9.7.3 identifies the London Environment Strategy as setting out a pathway to achieving this target. London Environment Strategy policy 7.2.1 sets the target of 50% LACW recycling by 2025, whilst policy 7.2.2 seeks a minimum of 75% business waste recycling by 2030. In **Table 2.2**, these targets are applied to the updated waste forecast arisings set out in **Table 2.1**.
- 2.5.21 **Table 2.2** shows that, simply applying the recycling rates of the London Environment Strategy to achieve the overall level of recycling sought in the draft London Plan, leaves nearly 3,250 million tonnes of residual wastes in 2026 and 3,135 tonnes in 2036 (**Table 2.2**, row g).

Table 2.2 London Environment Strategy recycling applied to updated waste forecast arisings, 2026, 2036

Description	2026 (million tonnes)	2036 (million tonnes)	row
Updated LACW forecast	3,881	4,047	a
Recycling at 50%	1,940	2,023	b
Residual LACW	1940.5	2,023	c
Updated C&I waste forecast	4,364	4,449	d
Recycling: 70% at 2.26; 75% at 2036	3,055	3,337	e
Residual C&I waste	1,309	1,112	f
Total residual waste	3,249	3,135	g

- 2.5.22 The calculations shown in **Table 2.2** are also presented in the relevant table of the **LWSA (7.2, APP-102)**, Table 4.5: Scenario 3b, dLP (page 51).
- 2.5.23 Subtracting the existing recovery capacity operating within London (2.2 million tonnes) would leave just over 1 million tonnes of residual wastes at 2026 and just under 1 million tonnes at 2036.
- 2.5.24 **Table 2.2** does not include any of the GLA's additional assumptions in relation to either the percentage of C&I waste that may be combustible or mass loss as a result of treatment. These are shown in **Table 5.1 of the Applicant's response to the GLA Deadline 4 Submissions (8.02.46, REP5-017)** which is replicated below as **Table 2.3** for ease of reference.

Table 2.3: Table 5.1 of the Applicant's response to GLA Deadline 4 Submissions

Description	2026 (Mt)	2036 (Mt)	Table A.3 row reference	row
Incorporating both the GLA's assumption that only 80% of C&I waste is combustible and that a further 10% of mass loss should be recognised				
Residual waste processible via EfW	2.7	2.5	H	a
Indigenous EfW capacity	2.2	2.2	I	b
Resultant indigenous capacity gap	0.5	0.3	J	c
REP ERF nominal throughput	0.7	0.7		d
Difference	-0.2	-0.4		e
Incorporating the GLA's assumption that only 80% of C&I waste is combustible				
Residual waste processible via EfW	3.0	2.8	H	g
Indigenous EfW capacity	2.2	2.2	I	h
Resultant indigenous capacity gap	0.8	0.6	J	i
REP ERF nominal throughput	0.7	0.7		j
Difference	0.1	-0.1		k

2.5.25 It is important to note that the Applicant does not agree with either of the GLA's assumptions that only 80% of C&I waste is suitable for combustion or that a further 10% mass loss should be included in the analysis. **Table 5.1 of the Applicant's response to the GLA Deadline 4 Submissions (8.02.46, REP5-017)** contains these assumptions simply to show the GLA's analysis in full.

2.5.26 **Table 5.1 of the Applicant's response to the GLA Deadline 4 Submissions (8.02.46, REP5-017)** demonstrates that applying all of the GLA assumptions still leaves a need for new residual waste treatment capacity (Table 5.1, rows c and i).

2.6 Air Quality

2.6.1 The scope of the Air Quality assessment is defined within **Section 7.1, Chapter 7 - Air Quality** of the **ES (6.1, REP2-019)**. This description of the topic is an appropriate basis upon which to produce the ES Chapter.

Legislation, Policy Context, Guidance and Standards

- 2.6.2 The policy context, legislation, guidance and standards considered in the assessment of Air Quality are noted in **Chapter 2 – Regulatory and Policy Background** of the **ES (6.1, APP-039)** and **Section 7.2, Chapter 7 – Air Quality** of the **ES (6.1, REP2-019)**.
- 2.6.3 The policy context, legislation, guidance and standards considered to inform the Air Quality assessment are agreed with the exception of whether guidance expects workplaces to be relevant locations for considering annual average impacts. The Applicant considers that they are not relevant locations, whilst the GLA considers that they are as set out in **Section 3.5** of this SOCG.

Consultation

- 2.6.4 Consultation undertaken with regards to Air Quality is summarised in **Section 7.3, Chapter 7 – Air Quality** of the **ES (6.1, REP2-019)**.
- 2.6.5 The summary of consultation presented is correct so far as it provides an accurate record of consultation with the GLA on Air Quality to date.

Reasonable Worst-Case Parameters Used for Assessment

- 2.6.6 The methodology for Air Quality is presented in:
- **Section 7.5, Chapter 7 – Air Quality** of the **ES (6.1, REP2-019)**;
 - **Section 6.5 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling within opportunity areas, additional residential areas and at elevated locations;
 - **Table D.8 of Appendix D of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling at the additional receptor location adjacent to the A206; and
 - The **Anaerobic Digestion Facility Emissions Mitigation Note (8.02.42, REP4-021)** regarding modelling the missions from the CHP engine.
- 2.6.7 Apart from the application of professional judgement to the consideration of the overall significance of effects, the assessment methodology is agreed.
- 2.6.8 The cumulative assessment methodology for Air Quality is presented in **Section 4.10, Chapter 4 – ES Assessment Methodology** of the **ES (6.1, APP-041)**. The cumulative assessment methodology is agreed.

Assumptions and Limitations

- 2.6.9 Assumptions made with regards to Air Quality are summarised in **Section 7.6, Chapter 7 – Air Quality** of the **ES (6.1, REP2-019)**.
- 2.6.10 The assumptions presented are agreed.

Baseline Conditions and Receptors

- 2.6.11 The baseline conditions and receptors for Air Quality are presented in:
- **Section 7.7, Chapter 7 – Air Quality** of the **ES (6.1, REP2-019)**; and

- **Section 6.5 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling within opportunity areas, additional residential areas and at elevated locations.

2.6.12 The baseline conditions and receptors presented are agreed.

Embedded Mitigation

2.6.13 The embedded mitigation which is those designed to be an inherent part of the scheme for which development consent is sought or those which would be undertaken to meet existing legislative requirements for potential Air Quality effects is set out in **Section 7.8, Chapter 7 – Air Quality of the ES (6.1, REP2-019)**.

2.6.14 The DCO constraint on average emission limit value and the annual emission limit from the ERF and CHP engine is presented at Deadline 5 in Requirements 15 and 16 of the **dDCO (3.1, Rev 3, REP5-003)**. It is agreed that this will ensure that the impacts of REP are no higher than assessed in the ES.

Assessment of Likely Effects

2.6.15 The assessment of effects during construction and decommissioning for Air Quality is presented in **Section 7.9, Chapter 7 – Air Quality of the ES (6.1, REP2-019)**. The assessment of effects during construction and decommissioning presented is agreed.

2.6.16 The assessment of effects during operation for Air Quality is presented in:

- **Section 7.9, Chapter 7 – Air Quality of the ES (6.1, REP2-019)**;
- **Section 6.5 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling within opportunity areas, additional residential areas and at elevated locations; and
- **Table D.8 of Appendix D of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling at the additional receptor location adjacent to the A206.

2.6.17 The assessment of effects during operation presented in the ES is agreed, with the exception of the number of receptors in the application of professional judgement for the ERF effects.

Cumulative Assessment

2.6.18 The assessment of cumulative effects for Air Quality is presented in:

- **Section 7.10, Chapter 7 – Air Quality of the ES (6.1, REP2-019)**; and
- **Section 6.5 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling within opportunity areas, additional residential areas and at elevated locations.

2.6.19 The cumulative effects presented are agreed.

Further Mitigation and Enhancement

2.6.20 The consideration of further mitigation and enhancement measures for Air Quality are presented in:

- **Section 7.11, Chapter 7 – Air Quality of the ES (6.1, REP2-019)**; and

Commented [EE25]: VH Comment (15 May 2019): Not agreed. We did not comment on the EIA Scope.

Commented [EE26R25]: The Applicant received comments from Stephen Inch (through an email correspondence with Samantha Davenport) on 7th March 2018. See Section 3.3 for more details.

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- The **Anaerobic Digestion Facility Emissions Mitigation Note (8.02.42, REP4-021)** regarding modelling the emissions from the CHP engine.

2.6.21 Further mitigation measures for NO_x emissions from the ERF are contained within the Environmental Permit application for the installation. It is agreed that the inclusion of Requirement 15 of the **dDCO (3.1, Rev 3, REP5-003)** would reduce the impacts of NO_x emissions from the ERF as assessed in the DCO application.

2.6.22 The consideration of further mitigation and enhancement measures are appropriate, and it is agreed that no further mitigation and enhancement measures are required.

Residual Effects and Monitoring

2.6.23 The summary of residual effects for Air Quality is presented in **Section 7.12, Chapter 7 – Air Quality** of the **ES (6.1, REP2-019)**, supplemented by the results of the additional assessments presented in:

- **Section 6.5 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling within opportunity areas, additional residential areas and at elevated locations;
- **Table D.8 of Appendix D of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** for the modelling at the additional receptor location adjacent to the A206; and
- The **Anaerobic Digestion Facility Emissions Mitigation Note (8.02.42, REP4-021)** regarding modelling the emissions from the CHP engine.

2.6.24 A schedule of mitigation and monitoring is presented in **Chapter 17 – Schedule of Mitigation** of the **ES (6.1, APP-054)**.

2.6.25 The summary of residual construction phase effects and operational phase effects on terrestrial biodiversity receptors is agreed and the monitoring is appropriate.

2.7 Energy and Heat Off Take

2.7.1 Policy 5.17 of the London Plan states that proposals for waste management plants generating energy from waste will need to meet or demonstrate that steps are in place to meet a carbon intensity floor (CIF) of 400 grams of CO₂eq per kWh of energy produced. Policy S18 of the draft London Plan uses similar wording.

2.7.2 The CIF is a threshold which simply needs to be met as a minimum. The Applicant has demonstrated that REP is able to meet the CIF (using all versions of the GLA's Ready Reckoner tool) under every operational scenario. REP would therefore be entirely compliant with extant policy.

2.7.3 As set out under Policy 7.3.2 of the London Environment Strategy, the GLA may review the CIF level before 2025 (although the CIF level will not be amended before 2025) with a view to tightening it to around 300 grams, which all new and existing EFW facilities would be expected, by the GLA, to meet. Clearly, any amendment to the CIF level would be subject to industry consultation and what is technically feasible in light of the waste sector and EFW facility performance at that time.

2.7.4 The GLA ready reckoner tool can be used to evaluate proposals against the carbon intensity floor. The Applicant has used a draft version of the tool, provided by the GLA, to calculate the CIF for the ERF as follows, based on net calorific value of the waste and the design electrical efficiency. These calculations exclude any benefit from the Anaerobic Digestion facility.

Table 2.4: Carbon Intensity Floor Calculations

CIF
400 g CO ₂ eq/kWh with no heat export.
394 g CO ₂ eq/kWh with 3 MWth to the on-site Anaerobic Digestion facility
329 gCO ₂ eq/kWh with export of 30 MWth to district heating.
323 g CO ₂ eq/kWh with export of 30 MWth to district heating and 3 MWth to the on-site Anaerobic Digestion facility.

Commented [DS27]: Table to be updated following Cory using the correct version of the tool, where the performance of the EFW and AD facilities are reported separately instead of combined

Commented [NM28R27]: Awaiting clarifications from Eunomia

Commented [SO29R27]: The figures in the table come from the version of the tool provided to us. Can we agree that the figures are correct if the electrical efficiency is correct, even if we disagree about the actual electrical efficiency?

Commented [EE30]: VH Comment (15 May 2019): Points not agreed.

- 2.7.5 Paragraph 5.85A of the London Plan states that waste to energy facilities should be equipped with a heat off-take from the outset. Paragraph 9.8.11 of the draft London Plan agrees. REP meets this requirement by being developed as fully CHP Enabled.
- 2.7.6 Paragraph 5.85A of the London Plan states that it should be demonstrated that capacity of the heat off-take meets the carbon intensity floor at 100% heat supply. Paragraph 9.8.11 of the draft London Plan agrees. REP meets this requirement as demonstrated above, achieving a CIF of 323 g CO₂eq/kWh.
- 2.7.7 Paragraph 5.85B of the London Plan gives examples of demonstrable steps, including:
- a. a commitment (via a Section 106 obligation) to deliver the necessary means for infrastructure to meet the min CO₂ standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency;
 - b. an agreed timeframe (via a S106) as to when proposed measures will be delivered;
 - c. the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority.
- 2.7.8 Paragraph 9.8.13 of the draft London plan includes these three examples and adds a fourth:
- d. a commitment to source truly residual waste – waste with as little recyclable material as possible.
- 2.7.9 The Applicant has put in place a number of demonstrable steps to realise heat export from REP, as set out in the **Combined Heat and Power Supplementary Report (5.4.1, REP2-012)**. In summary:
- a. REP is being developed as fully CHP-Enabled from the outset by virtue of installing the necessary on-site heat export infrastructure as part of the proposed construction programme. This approach means that REP would be capable of exporting heat from the commencement of operations and demonstrates clear

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commitment from the Applicant by exceeding Environment Agency best available technique (BAT) requirement and going beyond the requirements at section 4.6 of NPS EN-1.

- b. The Applicant is making significant steps, at its own cost, in establishing and maintaining momentum in the heat network development process via the Bexley District Heating Partnership Board, and its positive contribution has been recognised by stakeholders. The Applicant has engaged directly with the LBB, GLA and their advisors, and this represents a committed approach relative to comparable projects at the pre-consent stage.
- c. The Applicant is fully engaged in supporting Ramboll, who has been engaged to evaluate the techno-economic feasibility of establishing a borough wide district heating network on behalf of the LBB.
- d. The Applicant has agreed to reasonable changes to Requirement 20 (now Requirement 26) of the dDCO in respect of ongoing commitments to ensuring that benefits associated with heat export are realised, including establishing a working group that combines both REP and the existing RRRF.

2.7.10 The Applicant notes that two of the commitments which the Applicant is actively delivering reflect specific demonstrable steps set out in the Draft London Plan policy S18 section 9.8.13.

2.7.11 REP meets the requirements of the London Plan and the draft London Plan related to the carbon intensity floor.

Adequacy of the Stakeholder Engagement

2.7.12 Heat export opportunities were discussed with the GLA in respect of REP in early 2017, and this is agreed as representing an early and considered approach.

2.7.13 A comprehensive pursuit of stakeholder engagement has been, and continues to be, undertaken by the Applicant. This has included discussions with local planning authorities (London Borough of Bexley and Royal Borough of Greenwich), the GLA, housing developers (Peabody and Orbit Homes), and local industry partners. The Applicant is a founding member of the Bexley District Heating Partnership Board through which a collective ambition to deliver a heat network in the locality has been formed. These discussions have been used to inform the technical design and commercial parameters for the proposed heat network.

2.7.14 More recently, the role and likelihood of public sector involvement has been investigated and discussed in some detail with the GLA and its advisors in meeting held on 01 February 2019, and with LBB and its advisors in meeting held on 20 February 2019. In addition, both public sector bodies have been present at District Heating Partnership Boards meetings.

2.8 Draft Development Consent Order (DCO)

2.8.1 The Parties are agreed on the wording of the operative provisions of the **dDCO** (Articles 1 – 43) (**3.1, Rev 3, REP5-003**), except from those matters which are set out in **Section 3.7** of this SOCG.

2.8.2 The Parties are agreed on the wording of the requirements contained in **Schedule 2** of the **dDCO** (**3.1, Rev 3, REP5-003**), except from those matters which are set out in **Section 3.7** of this SOCG.

Changes made to the Draft Development Consent Order

2.8.3 Throughout the examination, the Applicant has made amendments to the **dDCO** (**3.1, Rev 3, REP5-003**) in response to matters raised by the GLA. It is considered that the following additions

Commented [EE31]: DS Comment (May 2019): Not agreed. We have reservations over the claimed efficiency of the proposed ERF.

Commented [EE32R31]: Updated information on efficiency has been provided into the examination.

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and amendments to the requirements of the **dDCO (3.1, Rev 3, REP5-003)** address the majority of GLA's previous concerns.

Table 2.5: Changes made to the Draft Development Consent Order

Requirement Number	Description
New Requirement 15 (Emission limits – Work No. 1A)	New requirement inserted to limit the Applicant to an average daily emission limit value and an annual emission limit value for nitrogen oxide and nitrogen dioxide for the ERF. This ensures the ERF operates within the parameters assessed in the ES.
New requirement 16 (Emission limits – Work No. 1B)	A new emissions Requirement has been inserted in respect of the Anaerobic Digestion facility, which restricts the average emission limit value and the annual emission limit value for nitrogen oxide and nitrogen dioxide. This ensures the Anaerobic Digestion facility operates within the parameters assessed in the ES.
New requirement 17 (Ambient air quality monitoring)	This has been inserted to provide for the Applicant to prepare an air quality monitoring programme, which must also meet the requirements of any air quality monitoring condition on the Environmental Permit. The Applicant will then undertake that air quality monitoring programme at its own cost.
New requirement 18 (Waste hierarchy scheme)	This has been inserted to require the Applicant to prepare a scheme setting out arrangements for maintenance of the waste hierarchy.
Requirement 23 (Community Benefits)	This has been included to set out that no part of the authorised development may commence until an employment and skills plan is submitted and approved by the relevant planning authority.
Requirement 25 (Phasing of construction and commissioning of Work Number 1)	This has been inserted to commit the Applicant to set out the phasing on the construction and commissioning of Work No. 1. The Anaerobic Digestion facility must be constructed with the ERF.
Requirement 26 (Combined heat and power)	<p>The Applicant's insertion of CHPQA into Requirement 20, was at the request of the GLA in its Local Impact Report, which stated that <i>"The review should provide for ongoing monitoring and full exploration of potential commercial opportunities to use heat from the development as part of a Good Quality CHP scheme (as defined in CHPQA Standard issue 3), and for the provision of subsequent reviews of such opportunities as necessary."</i> The Applicant's amendment was therefore made at the GLA's recommendation.</p> <p>In relation to Requirement 20(2)(b) (now Requirement 26(3), the Applicant is content to replace "sufficient details are known" with "there is sufficient certainty..." This is made in the dDCO (3.1, Rev 3, REP5-003).</p> <p>In relation to the Working Group, the Applicant is content to make the changes requested by GLA. However, the competent CHP consultant is to be appointed by the undertaker and the Applicant has not included what the review should consider as that scope is</p>

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Requirement Number	Description
	to be agreed by the working group. These changes are reflected in the dDCO (3.1, Rev 3, REP5-003) .
Requirement 27 (Use of compost material and gas from Work Number 1B)	This has been inserted to commit the Applicant to submit an Anaerobic Digestion review, looking at the feasibility and commercial viability of connection to the gas grid network and for export of the compost material produced. The Applicant is only required to consider the opportunities for gas grid network connection in the first Anaerobic Digestion review. However, should the export of the compost material not be feasible or commercially viable at the first review, the Applicant will carry out a review every 5 years, until it is demonstrated that the export of compost material produced from Work Number 1B is technically feasible and commercially viable

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3 Matters not agreed between the Parties

3.1 Introduction

3.1.1 The Parties confirm that the following areas are not agreed between the Parties:

3.2 Principle of the Proposed Development

Table 3.1: Principles of the Proposed Development – matters not agreed

GLA's position	The Applicant's position
<p>The GLA maintains its position that the adverse effects of the proposed development have been under reported and its potential benefits overstated. Contending that the adverse effects of the development, in particular the ERF, would outweigh the purported benefits of the REP. The GLA believes therefore that, in accordance with section 104(7) PA 2008, the statutory exemption applies and the application should not be decided in accordance with the NPSs.</p>	<p>The Applicant has further addressed these points in the Applicant's Response to the Greater London Authorities Deadline 4 Submissions (8.02.46). In summary:</p> <ul style="list-style-type: none"> • NPS EN-1, as reaffirmed by NPS EN-3, establishes the need for the Proposed Development; • NPS EN-1 requires that substantial weight be given to the contribution that the Proposed Development would make towards satisfying the identified need; • There is a presumption in favour of granting consent for the Proposed Development; and • The ExA, and the Secretary of State then has to balance the Proposed Development's adverse impacts against its benefits (as per EN-1 paragraph 4.1.3, the latter includes the substantial weight that must be given to the Proposed Development's contribution to satisfying the identified need). <p>Furthermore, the Project and its Benefits Report (7.2, APP-103) demonstrates that REP is wholly in compliance with policy and delivers</p>

Commented [EE33]: DS Comment (08 May 2019): A new section is needed here: 'Matters no agreed' and should be the core thrust of the document. The core matters that we don't agree are summarised in our relevant Representation and could be set out here

Commented [EE34R33]: VH Comment (15 May 2019): As set out above, given that the majority of matters are not agreed. These headings are misleading.

Commented [EE35R33]: Section title amended

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GLA's position	The Applicant's position
	substantial environmental, economic and social benefits. The benefits of REP are summarised in Section 2 of this document.

3.3 Scope of the EIA

Table 3.2: Scope of the EIA – matters not agreed

GLA's position	The Applicant's position
<p>The GLA asserts that it does not agree with the scope of the EIA, in particular aspects of the Air Quality Assessment as detailed in section 3.4 below, and that it was not provided an opportunity to comment on the scope of the EIA.</p>	<p>In accordance with Regulation 10 of the EIA Regulations, the Applicant submitted an EIA Scoping Report to the Secretary of State via the Planning Inspectorate (PINS) on 27th November 2017 (received on 28th November 2017), along with a request for an EIA Scoping Opinion. A Scoping Opinion was received from the Secretary of State via PINS on 5th January 2018, following its consultation with prescribed consultees (see Appendix A.1 of the ES (6.1, APP-062)).</p> <p>The Scoping Opinion included a list of all prescribed consultation bodies consulted by PINS on behalf of the Secretary of State, as required by Regulation 11(1)(b) of the EIA Regulations ('the Regulation 11 List'), and comments on the EIA approach and topic areas, including confirmation of topics unlikely to have a significant environmental effect.</p> <p>In accordance with Regulation 11(1)(b) of the EIA Regulations, PINS informed the Applicant, in writing, of the names and addresses of the prescribed consultees notified. The Applicant was informed that the GLA was identified as prescribed consultee and a contact detail was provided. The Applicant received the Regulation 11 List on 5th January 2018.</p> <p>Following diligent inquiries, it came to the Applicant's attention in March 2018 that the contact detail on the Regulation 11 List for the GLA (Paul Watling) was incorrect. Rather, Paul Watling works for the London Assembly and not the GLA. The Applicant was then provided a contact detail for Kate Randall, a Senior Planner in the Development Management Team at the GLA. During</p>

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GLA's position	The Applicant's position
	<p>telephone correspondence between the Applicant and Kate Randall on 13th March 2018, Kate Randall informed the Applicant that the Scoping Report had been received and logged by the GLA.</p> <p>The Applicant notified the Planning Inspectorate of the issues experienced with the contact details provided for the GLA in the Regulation 11 List at a meeting held between PINS and the Applicant in May 2018.</p> <p>Despite these issues, the Applicant provided several opportunities for the GLA to provide comments on the scope of the EIA assessment in February 2018. An overview of the engagement is summarised below:</p> <ul style="list-style-type: none">■ 7th February 2018 - the Applicant provided a link to the EIA Scoping Report and Scoping Opinion on PINS website to Andrew Richmond at the GLA following their meeting (held on 7th February 2018);■ 8th February 2018 – the Applicant's Landscape Consultant provided a link to the EIA Scoping Report on PINS website to Elliot Kemp at the GLA and offered the opportunity for the GLA to comment on the proposed viewpoints for the Townscape and Visual Impact Assessment;■ 9th February 2018 – the Applicant provided a link to the EIA Scoping Report and Scoping Opinion on PINS website to Andrew Richmond at the GLA;■ 14th February 2018 – the Applicant's Air Quality Consultant provided a link to the EIA Scoping Report on PINS website to Stephen Inch at the GLA and requested clarity on policy and the likelihood for additional assessments;■ 26th February 2018 – the Applicant's Ecologist provided a link to the EIA Scoping Report on PINS website to Peter Massini at the GLA and offered the opportunity for the GLA to comment on the survey

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GLA's position	The Applicant's position
	<p>scope, proposed screening distances and Biodiversity Metric methodology; and</p> <ul style="list-style-type: none"> 7th March 2018 – the Applicant received an email from Samantha Davenport at the GLA confirming members of the environment team “reviewed the scoping report” and provided comments for air quality and ecology to the Applicant. <p>The Applicant therefore contends that the GLA had adequate opportunity to comment on the scope of the EIA.</p>

3.4 Waste Management

Table 3.3: Waste Management – matters not agreed

GLA's position	The Applicant's position
<p>London Waste Capacity</p> <p>The GLA maintains that there is no requirement for additional energy recovery capacity to manage London's residual waste.</p>	<p>The Applicant's assessment (set out in the London Waste Strategy Assessment (Annex A of The Project and its Benefits Report (7.2, APP-103))) incorporates: waste arisings forecasts from both the London Plans; recycling targets from both the London Plans and the London Environment Strategy (reaching 65% by 2030); net self-sufficiency by 2026; and operational capacity (2.2 million tonnes agreed with the GLA) to demonstrate that there remains in the order of 900,000 tonnes of residual waste that should be diverted from landfill. This is most neatly shown in Figure 1 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014).</p>
<p>Compliance with the waste hierarchy</p> <p>The GLA maintains that its own projections, as well as the combined findings of surrounding Waste Planning Authorities, indicate that the</p>	<p>The Applicant's assessment (set out in the London Waste Strategy Assessment (Annex A of The Project and its Benefits Report (7.2, APP-103))), prepared to respond to the policy tests set out at paragraphs 2.5.66, 2.5.67 and 2.5.70 of NPS EN-3, demonstrates that REP is in accordance</p>

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GLA's position	The Applicant's position
<p>scale of the ERF is oversized, relative to future regional requirements for residual waste management.</p> <p>Rather than diverting residual waste from landfill, the ERF is therefore likely to attract waste which must be recycled to meet the Mayor's recycling target of 65% recycling of municipal waste by 2030.</p> <p>On this basis, the effect of the ERF will in fact be in direct contradiction to the waste hierarchy.</p>	<p>with the waste hierarchy and is of an appropriate type and scale so as not to prejudice the achievement of national or local waste management targets.</p> <p>REP is not in contradiction with the waste hierarchy because it is one element of the infrastructure required, working alongside reduction and recycling, within London to ensure waste will be managed sustainably and diverted from landfill.</p> <p>In the dDCO (3.1, Rev 3, REP5-003) submitted at Deadline 5, the Applicant has included a Requirement regarding the Waste Hierarchy (Requirement 18), obliging the Applicant to submit a scheme for approval that sets out the arrangements for maintenance of the waste hierarchy in priority order minimising recyclable and reusable waste received at the ERF.</p>
<p>Necessity for pre-treatment</p> <p>The GLA believes that to achieve the Mayor's policy requirement with regard to the CIF, the ERF must commit to sourcing truly residual waste, which requires pre-treatment to be included as a requirement on the DCO.</p>	<p>The CIF threshold is met in power-only mode and all CHP scenarios, adopting both formally published and unpublished versions of the GLA's Ready Reckoner tool. Pre-treatment is not required to achieve the CIF target.</p> <p>There is no policy or legislative requirement for pre-treatment to be included within the Proposed Development. The Applicant has demonstrated that REP is at the right scale and right level of the waste hierarchy. It is, of itself, one of the key elements of waste management infrastructure required within London, working alongside existing and new recycling and pre-treatment facilities, to enable the waste hierarchy to be delivered within London.</p> <p>However, the Applicant is content to include a new Requirement in the dDCO (3.1, Rev 3, REP5-003) that requires the undertaker to submit to the relevant planning authority for approval a waste hierarchy scheme, setting out arrangements for maintenance of the waste hierarchy in priority order by minimising recyclable and reusable waste received at the authorised development during commissioning and the operational period.</p>
<p>Combustibility of C&I waste</p>	<p>The Applicant does not agree that this is a key reason for the divergence between the parties. Even if 20% were deducted from the 900,000 tonnes of residual waste (demonstrated by the Applicant to require diversion from</p>

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GLA's position	The Applicant's position
<p>The GLA believes that only c.80% of C&I waste is suitable for combustion and asserts that this is a key point of divergence between it's and the Applicant's assessment of need for future capacity.</p>	<p>landfill) there would remain c.700,000 tonnes of residual waste, more than the nominal throughput of REP.</p> <p>In any event, the GLA's assertion relies on data that is now 10 years old and which is not representative of the types of waste likely to be generated in London today, such that the GLA's assumption is not justified.</p>
<p>Waste Transfer Stations</p> <p>The GLA does not agree with the Applicant that the environmental effects of waste delivery have been properly assessed in the EIA.</p>	<p>The Applicant's rationale for its assumptions relating to the transfer of waste are set out in Paragraphs 2.1.171 to 2.1.175 of the Applicant's Response to the GLA's Written Representation (8.02.14, REP3-022) and Section 6.5 of Applicant's Response to the Greater London Authorities Deadline 4 Submissions (8.02.46). The Applicant's Transport Assessment (Chapter 6 - Transport of the ES (6.1, REP2-017)) makes reasonable worst-case assumptions and considers the transfer of waste to REP from riparian Waste Transfer Stations at Smugglers Way, Cringle Dock, Walbrook Wharf, Northumberland Wharf and the Port of Tilbury. No significant effects were identified.</p> <p>Consideration of methods of transport to the WTSs is not necessary as each of these has already been granted planning permission and Environmental Permit consents which have considered the impacts of transporting waste to them as set out further below.</p> <p>Furthermore, the scope of the transport assessment was agreed with LBB as Highway Authority.</p>
<p>Waste Transfer Stations</p> <p>The GLA believes that the Applicant has not provided evidence that the four existing waste transfer sites (WTSs), which lie along the River Thames and are leased from Western Riverside Waste Authority (WRWA), can manage additional waste for onward management at the proposed ERF.</p>	<p>The riparian Waste Transfer Stations at Smugglers Way, Cringle Dock, Walbrook Wharf, Northumberland Wharf and the Port of Tilbury have existing planning and Environmental Permit consents, with sufficient capacity to accept the waste required by REP. As demonstrated in the Applicant's response to the ExA's Second Written Questions (Q2.2.1) (8.02.60), in total, the Applicant has some 1.390 million (m) tonnes of consented riparian waste throughput capacity available at the existing WTSs in London. Of that, approximately 0.668 m tpa of waste is transported by river each year to serve the Riverside Resource Recovery Facility (RRRF).</p>

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GLA's position	The Applicant's position
	<p>After RRRF, there is 0.722 m tpa of existing surplus spare consented throughput capacity available to REP in London. To put this in context, REP's nominal throughput is 0.655 m tpa and is the anticipated level of operational throughput that will be achieved. REP's maximum throughput is 0.805 m tpa. This is the upper level tested as a 'reasonable worst case' for the REP DCO ES.</p> <p>The Applicant also has an additional 0.075 m tpa of permitted throughput at the Port of Tilbury which is not yet operational. Accordingly, with the Port of Tilbury, total river throughput capacity available for REP is 0.797m tpa.</p> <p>In addition to transportation by river, REP has a proposed road allowance of 0.24 m tpa which will be secured through DCO Requirement 14 of the dDCO (3.1, Rev 3, REP5-003).</p> <p>Overall, with surplus consented river throughput and the road allowance, there is 1.037m tpa of logistical capacity available to REP.</p> <p>It is evident that the Applicant has more than enough consented throughput capacity at its riparian WTSs to meet the needs of REP based on existing and projected throughput by river transport.</p>

3.5 Air Quality

Table 3.4: Air Quality – matters not agreed

GLA's position	The Applicant's position
<p>The GLA considers that workplaces are relevant locations for consideration of annual average air quality impacts as workplaces are mentioned in the NPPF as locations where air quality needs to be considered.</p>	<p>The Applicant has set out its position with regards to the GLA's assertion relating to workplaces in Section 7.2 of the Applicant's Response to the Greater London Authorities Deadline 4 Submissions (8.02.46). The Applicant considers that workplaces are not relevant locations for annual average air quality impacts as employees would not be present at work for the averaging period of the objective.</p>
<p>The GLA does not agree with the Applicant that the embedded mitigation applied to the NO_x emissions from the ERF is appropriate. In particular, the GLA considers that NO_x emissions from the ERF could be as low as 50mg/Nm³ in line with the draft BREF note.</p>	<p>The Applicant considers that the proposed embedded mitigation applied to the NO_x emissions in the form of SCR (in combination with a range of primary abatement techniques) complies with Best Available Techniques and that emissions will be lower than any other mass-burn ERF in the UK.</p> <p>The Final Draft Waste Incineration BREF sets out a range of emission levels for NO_x on the basis that when selecting an abatement technique and emission level, a balance must be struck between minimising all emissions resulting from the abatement system (NO_x and NH₃), fuel composition, site specific constraints, resource (energy and water) consumption, technology maturity and bankability, local air quality designation and impact on receptors, and capital and operating costs associated with the abatement technique.</p> <p>As stated in 'UK Regulators Large Combustion Plant Best Available Techniques Interpretation Document' (Working document V1.1) dated 9 May 2018, DEFRA has issued 'Part A Guidance' to the EA that instructs inspectors [the EA] <i>'to take the top of the range as the permitting value, unless compliance with an Air Quality standard requires a lower value'</i>. Due to the Applicant's additional investment in selective catalytic reduction (SCR) which it considers to be a 'cutting-edge' technology, the emission level for NO_x is significantly lower than the upper range of the BAT emission level.</p>

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GLA's position	The Applicant's position
	<p>This proposal is described in detail in the Environmental Permit and Air Quality Note (8.02.06, REP2-057).</p> <p>Taking account of the factors described above, the Applicant has selected an emission level which is compliant with all European and national guidance, represents the lowest level for a facility of this type in the UK, can realistically be financed and delivered, and is being independently verified and determined by the environmental regulator for England, the Environment Agency. Perhaps most importantly, as set out in Chapter 7 - Air Quality of the ES (6.1, REP2-019), the proposed emission level results in impacts which are classified as not significant on both human health and terrestrial biodiversity receptors.</p> <p>Furthermore, the Applicant has included three new Requirements in the dDCO (3.1, Rev 3, REP5-003) at Deadline 5, in relation to air quality emissions. These are:</p> <ul style="list-style-type: none"> • Requirement 15: Emissions Limits – Work Number 1A • Requirement 16: Emission Limits – Work Number 1B; and • Requirement 17: Ambient air quality monitoring <p>Section 2.7 of this document provides further details on this.</p>
<p>The GLA does not agree with the Applicant on the application of professional judgement to consider the likely significant effects from the ERF emissions, in particular in the way that the number of properties subject to slight adverse impacts is taken into account in the assessment. The GLA considers that emissions from the ERF could therefore have a significant effect on human health receptors.</p>	<p>The Applicant contends that the number of properties affected by slight adverse impacts is only one of the criteria that needs to be taken into account; it is in addition to the other factors set out in Paragraph 7.5.62 of Chapter 7 - Air Quality of the ES (6.1, REP2-019). The Applicant's position is that the number of properties affected can be ascertained by reference to the contour plots presented in the ES, but that this is just one element to be considered in the determination of the overall significance of the effect. In particular, one should take into account the overall concentration when considering whether or not an effect will be significant and taking this into account, there are no significant effects.</p>

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GLA's position	The Applicant's position
	<p>The Applicant has fully considered potential effects on human health receptors in the Human Health Risk Assessment (HHRA) (6.3, REP2-040), and further evidence has been provided in the Post Hearing Note on Public Health and Evidence (8.02.27, REP3-033).</p>
<p>The GLA believes that the Applicant has not provided sufficient information to show that increased pollution resulting from the REP will not act as a constraint on the delivery of the tall buildings needed to achieve the required density for the London Riverside Opportunity area.</p>	<p>The Applicant has since provided additional modelling at a range of different elevations to assess the impact of the Proposed Development within the London Riverside Opportunity Areas.</p> <p>The Applicant identified the following areas of proposed residential development within the London Riverside Opportunity Area as potentially including 'tall buildings':</p> <ul style="list-style-type: none"> • R1 – Beam Park; • R2 – Chequers Corner/Dagenham Dock Station; • R3 - Barking Riverside; • R4 - Barking Town Centre; • R5 - River Roding. <p>In order to present a robust worst-case situation, receptors were located in each area (at the closest point to REP) at elevations from 0m to 75m at 15m intervals (i.e. 0m, 15m, 30m, 45m, 60m, 75m).</p> <p>This maximum height of 75m corresponds to the consented 23-storey Vicarage Field development in Barking Town Centre and the maximum for Barking Riverside of 76m. A vast majority of these areas will not approach these heights and the findings are considered broadly applicable to the likely variation in concentration at elevation for other receptor locations at a comparable distance from REP.</p> <p>In addition, a receptor was located at Dovers Corner (R6) at ground level and a height of 15m corresponding to approximately 5 storeys.</p> <p>The predicted impact (process contribution (PC)) of the following pollutants was modelled; nitrogen dioxide (NO2) annual average and 99.79%ile of</p>

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GLA's position	The Applicant's position
	<p>hourly averages; arsenic (As) annual average; and nickel (Ni) annual average. The results are presented in Table 6.1 of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014). The assessment shows the Proposed Development will not have a significant impact on either long-term or short-term pollutant concentrations at ground level or elevated receptor locations within existing or proposed development areas.</p>
<p>The GLA believes that the rationale presented for excluding the worst-case receptor on the A206 is not convincing</p>	<p>The Applicant has undertaken an assessment of the impact of development traffic at the residential property on the east side of the A206 Queens Road at its junction with James Watt Way.</p> <p>A receptor location at the ground floor level of 16-72, James Watt Way has been used. The ADMS Roads model has been updated to include this receptor (grid reference 551496.6, 177717.5) and the additional road links within 200m as follows:</p> <ul style="list-style-type: none"> • Queens Road north and south of James Watt Way; • James Watt Way; • Erith High Street; • Manor Road. <p>In order to simulate queuing traffic at the junction, vehicle speeds were reduced for 50m either side of the junction on the A206 and for the complete length of James Watt Way to the roundabout. This is likely to overpredict concentrations as queuing traffic is unlikely to be continuously present on all links to this extent. The modelled NO2 concentration at this receptor has been determined using the same approach as presented in the ES (i.e. same Emission Factor Toolkit and verification process) assuming that operational HGV movements are capped as per the requirement in the dDCO (3.1, Rev 3, REP5-003).</p> <p>The predicted 2024 'Do Something' NO2 concentration at the additional receptor location is 42.0 µg/m3 with an increase of 0.1 µg/m3 (0.25% of the objective) when compared to the 2024 'Do Minimum' scenario. The impact</p>

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GLA's position	The Applicant's position
	at this receptor is therefore described as 'negligible' in accordance with Table 7.21 of Chapter 7- Air Quality of the ES (6.1, REP2-019) .

3.6 Energy and Heat Off Take

Table 3.5: Energy and Heat Off Take – matters not agreed

GLA's position	The Applicant's position
<p>The GLA considers that the 'Thamesmead & Belvedere Heat Network Feasibility Study: Work Package 2' indicates that heat demand in the region warrants supply from RRRF only.</p>	<p>The Applicant has set out its position in Section 4.2 and Section 4 of Appendix C of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014). In summary:</p> <ul style="list-style-type: none"> a. The feasibility study takes account of a "Core Scheme" network, in combination with limited adjacent existing buildings/sites only. Ramboll explicitly states that if a more aggressive build-out scenario is assumed then further heat sources will be required. b. A simple review of the feasibility study shows that heat demand projections are grossly under represented, in particular the Thamesmead Waterfront development and industrial sites in the Burt's Wharf area. c. GLA's position is predicated on the basis of annual heat volume, and does not account for heat demand variation throughout the year which impacts the heat demand capacity which can be served by a single heat source. Consideration must be taken for seasonal and diurnal heat network demand variation, which does not appear to be included. d. Ramboll recognises that regardless of heat demand volumes, the provision of supplementary heat generation and storage is required to meet year-round demand, which is proposed to comprise a mix of centralised and distributed plant. The benefits of connecting both REP

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GLA's position	The Applicant's position
	<p>and RRRF to a network would offer the optimum case in terms of low carbon heat year round by reducing and/or eliminating the need for conventional back-up boilers, in addition to displacing air quality impacts in close proximity to residential areas</p> <p>The analysis undertaken by the Applicant in its Combined Heat and Power Assessment (5.4, APP-035) and further clarified in its Combined Heat and Power Supplementary Report (5.4.1, REP2-012), are underpinned by and support the requirements of the national, regional and local policy position. Assessments have been carried out in accordance with applicable Government and Environment Agency guidance and toolsets and are supported by stakeholder engagement. The conclusions of the analysis indicate that there is sufficient heat demand in the region to warrant heat supply from both REP and RRRF.</p>
<p>The GLA considers that the conclusion regarding the need for additional heat sources (key finding 6) of Thamesmead & Belvedere Heat Network Feasibility Study cannot be relied on.</p>	<p>The contested point is defined as a key finding in the feasibility study.</p>
<p>The GLA considers that REP does not comply with CIF policy.</p>	<p>The Applicant has demonstrated that REP is able to meet the CIF (using all versions of the GLA's Ready Reckoner tool) under every operational scenario. REP would therefore be entirely compliant with extant policy.</p> <p>As set out in Section 4.2 of the Combined Heat and Power Supplementary Report (5.4.1, REP2-012), the Applicant has assessed CIF performance using GLA approved methodology within its Ready Reckoner tools dated October 2011 and November 2018 (both formally published), and two versions submitted to the Applicant in April 2019 (not consulted on or published). The Applicant has been agreeable in complying with the GLA's requests to recalculate carbon performance using these later versions and has demonstrated that REP will comply with the requirements of the CIF in all load cases and using any of the ready reckoner versions issued.</p>

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GLA's position	The Applicant's position
	<p>Assuming that the Mayor's policies (SI7 of the draft London Plan and proposal 7.1.1b and Objective 7.3 of the London Environment Strategy) achieve the desired reduction in plastic waste, the CIF performance of REP would improve, relative to current analysis, in the future. In addition, as the Applicant is committed to bringing forward heat export from REP, the CIF performance of REP would improve further. The Applicant has explained in detail how the CIF will be achieved in Paragraph 2.1.84 and Appendix A (see Paragraphs 1.1.1 to 1.1.12) of Applicant's Responses to Written Representations (8.02.14, REP3-022).</p>
<p>The GLA considers that the energy efficiency performance of REP (specifically the ERF) is overstated.</p>	<p>The Applicant has set out, in Appendix A and Paragraphs 1.1.1 to 1.1.12 of the Applicant's responses to Written Representations (8.02.14, REP3-022), why the efficiency level proposed for REP is entirely plausible, and how this compares to other modern ERFs. The proposed efficiency level, when compared on a consistent basis, is marginally above what is achieved by other modern facilities in the UK and Europe, and is justified by technological advancements within the design, which have been independently verified by Fichtner through thermodynamic modelling.</p> <p>The Applicant has further responded to this point in Section 5.2 and Appendix B of the Applicants response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014).</p>
<p>The GLA considers that the Proposed Development would only be low carbon if it operates as a CHP plant.</p>	<p>The GLA's position is based on a view that benefit should not be taken for displacing waste from landfill. The Applicant has set out its position in Paragraph B.1.1 of Appendix B to Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014), that the approach of considering the benefit associated with diversion of waste from landfill is justified in Department for the Environment Farming and Rural Affairs (DEFRA) report titled 'Energy from Waste – A guide to the debate 2014', paragraphs 35 to 46. The Applicant also notes that this approach was taken in the carbon assessment supporting the application made by Veolia for an ERF at Ratty's Lane in Hoddesdon (ref 7/0067-17) and that the inspector and Secretary of State supported this approach.</p>

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GLA's position	The Applicant's position
	<p>The GLA also contests the use of combined cycle gas turbine (CCGT) as the marginal source of electricity generation, which it considers to be incorrect. The Applicant has fully responded to this point in Section B.2 of Appendix B to Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014). The Applicant's position has been supported by the Secretary of State very recently in its decision on the application made by Veolia for an ERF at Ratty's Lane in Hoddesdon (ref 7/0067-17).</p>
<p>The GLA considers that the bio-energy content of the waste stream will be less than 50% and that therefore the project should not be treated as generating renewable energy.</p>	<p>The Applicant considers that the biogenic content (the proportion by weight), the biocarbon content (the proportion of the carbon in the waste derived from biomass) and the bioenergy content (the proportion of the energy in the waste derived from biomass) of the current waste supplied to RRRF all exceed 50% and that this will continue to be true in the future. This is because of the policy drivers to reduce the use of plastics, which will reduce the fraction of plastics in waste.</p> <p>The Applicant does not accept that there is a significant difference in policy terms between an ERF for which more than 50% of the energy is renewable and an ERF for which less than 50% of the energy is renewable, as explained in Paragraphs 2.1.48 to 2.1.51 of the Applicant's Responses to Written Representations (8.02.14, REP3-022).</p>
<p>The GLA considers that only two of the biogas utilisation options (inject to grid or upgrade to vehicle fuel) are agreeable, and that proposals do not allow for these to be brought forward.</p>	<p>The Applicant considers that by virtue of generating renewable biogas from residual food and green waste, any of the biogas utilisation options proposed would represent a highly beneficial use of the resource and would not give rise to unnecessary environmental burdens.</p> <p>Regarding air quality impacts, the reasonable "worst case" (onsite) emissions that would result from combusting the biogas in a CHP engine have been assessed. This approach is set out in detail in Paragraphs 2.1.65 to 2.1.71 of the Applicants responses to Written Representations (8.02.14, REP3-022). While this scenario means that the biogas would be substantially combusted onsite and therefore give rise to higher levels of local emissions (relative to alternative options), this does not mean that this</p>

GLA's position	The Applicant's position
	<p>scenario is any worse than other options when adequately contextualised. As set out in Table D.4 of Appendix D of the Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014), any of the biogas utilisation options identified would generate emissions during final use, whether that be in an internal combustion engine (if used in a vehicle) or in a domestic boiler or other process (if injected into the gas network).</p> <p>Biogas combustion within a CHP engine would be regulated via REP's Environmental Permit to, at minimum, the limits specified within the Medium Combustion Plant Directive (MCPD). Akin to the ERF, the Applicant is seeking to impose more stringent NOx emission limits than the limits specified by legislation and this scenario has been robustly tested within the DCO process, via Chapter 7 – Air Quality of the ES (6.1, REP2-019) and clarified within the Anaerobic Digestion Facility Emissions Mitigation Note (8.02.42, REP4-021) submitted at Deadline 4.</p> <p>In addition, the Applicant has committed to installing a selective catalytic reduction (SCR) abatement system on under the CHP engine scenario. The Anaerobic Digestion Facility Emissions Mitigation Note (8.02.42, REP4-021) concludes that under the CHP engine scenario, impacts on human health exposure are negligible and impacts on biodiversity are insignificant. Further, the Applicant has included, in the dDCO (3.1, Rev 3, REP5-003) to be submitted at Deadline 5, a requirement for the provision of abatement of the CHP engine of the Anaerobic Digestion Facility (see the Requirement on Emissions limits for Work No 1B).</p> <p>Proposals for all biogas utilisation options have been fully described from the application stage and are secured through the dDCO (3.1, Rev 3, REP5-003). Gas storage equipment is included in Work No. 1B of the dDCO, which specifies an anaerobic digestion system including "<i>(x) gas storage and upgrading equipment</i>".</p> <p>Similarly, proposals for a gas offtake pipe are described under Work No. 1B of the dDCO (3.1, Rev 3, REP5-003), which specifies an anaerobic digestion</p>

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GLA's position	The Applicant's position
	<p>system including “(xi) associated gas and process heat pipes”. To facilitate wider distribution of compressed natural gas to an appropriate fuelling point on the site, Work No. 5 of the dDCO describes “(o) infrastructure for the transmission and/or storage of compressed natural gas”.</p> <p>The Applicant has committed to a requirement that obliges the Applicant to submit a phasing plan for the construction and commissioning of each element of Work Nos. 1A, 1B, 1C and 1D and that Work No. 1B must be constructed in the same phase as Work No. 1A. This is included in the dDCO (3.1, Rev 3, REP5-003) submitted for Deadline 5.</p> <p>The Applicant has also engaged with the local gas network operator to undertake further analysis into the viability of supplying biomethane into the local gas grid. The Applicant will provide an update on this analysis at the earliest opportunity. To this end, the Applicant has included in the dDCO (3.1, Rev 3, REP5-003), a Requirement that obliges the Applicant to review the opportunities for exporting gas to the grid.</p>
<p>Compliance with the Climate Change Act 2008</p> <p>The GLA accepts that the NPS is the extant policy but asserts that if the Applicant is required to set out an explicit need case, the legal context in which it must do so is different to that which existed when the NPS was adopted, in light of the evolution of the Government's position on Climate Change.</p>	<p>Section 104(2) of the PA 2008 lists matters the Secretary of State must have regard to, which includes any relevant NPS. The GLA states that the legal context in which the Application must be determined is vastly different to the legal context that existed when the Energy NPSs were adopted in 2011.</p> <p>However, whilst the Climate Change Act 2008 has been amended, that does not change the position that EN-1, EN-3 and EN-5 remain the NPSs relevant to the Application, and pursuant to section 104(2) the Secretary of State must have regard to those NPSs. Furthermore, under section 104(3) of the PA 2008, the Secretary of State must determine the Application in accordance with those NPSs, except to the extent that any one or more of the exceptions apply.</p> <p>The Secretary of State is able to review an NPS pursuant to section 6 of the PA 2008 where there has been a significant change in any circumstances on the basis of which any of the policy set out in the NPS was decided. The</p>

GLA's position	The Applicant's position
	<p>Secretary of State, to date, has not exercised this power despite the, as the GLA puts it, "<i>evolution of climate change policy</i>" since the adoption of the energy NPSs in 2011. Accordingly, and as the GLA accepts, the NPSs remain the extant primary policy against which the Application must be determined against.</p> <p>The overarching energy NPS EN-1 establishes the UK Government's policy for achieving multiple energy policy objectives, including energy security alongside the need for decarbonisation. The NPS was devised in the context of climate change and EN-1 expressly deals with climate change. Indeed, alternatives were considered that placed more emphasis on a reduction in CO2 emissions. It is in that context that NPS EN-1 recognises the expectation of an increase in demand for electricity, including as a result of the need to decarbonise other sectors of the UK economy such as transport and building heating.</p> <p>It is clear that a single project, supported by the NPS, cannot in itself result in a breach of international or domestic obligations on carbon emissions. Therefore, sections 104(4), (5) and (6) of the Planning Act 2008 are not engaged.</p>

3.7 Draft Development Consent Order (DCO)

Table 3.6: Draft Development Consent Order – matters not agreed

GLA's position	The Applicant's position
<p>Requirement 11 (Code of Construction Practice)</p> <p>The amendment to accommodate inclusion of 'pre-commencement' activities into the CoCP is welcomed by the GLA.</p> <p>The Applicant committed in the DCO ISH to adopting the NRMM LEZ as a requirement; however, the proposed wording in the CoCP merely</p>	<p>The CoCP (7.5, REP5-010) at paragraph 4.3.2 is clear that best practice measures will be incorporated into the construction of the Proposed Development. Paragraph 4.3.2 also refers to adherence to guidance, such as the SPG on "<i>The Control of Dust and Emissions During Construction and Demolition</i>", 2014 (which includes the NRMM LEZ).</p>

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GLA's position	The Applicant's position
<p>indicates the NRMM LEZ as an example of good practice and is not sufficient to meet that commitment. For most major planning applications in London compliance with the NRMM LEZ is secured and enforced through a planning condition, which includes registering equipment through the online portal and submitting to inspection. A formal requirement should be included in the DCO to enable the REP development to be treated equitably with other developments in London.</p> <p>As with other construction related issues this requirement, when introduced, should apply to pre-commencement works.</p>	<p>Should the SPG remain in place at the time of submission of the final form CoCP, then the final CoCP will contain practices that adhere to the policies in that SPG. If, however, there are more up to date best practices and guidance at that time, then those best practices and guidance will be followed.</p> <p>The CoCP should be allowed to follow the best practice and the guidance at the time the final form CoCP is submitted to ensure that the construction of the Proposed Development is genuinely following best practices. Therefore, no amendment is deemed necessary.</p> <p>The SPG is contained in the CoCP, which is subject to a Requirement. For this reason, and for the reasons above regarding changes to best practice and guidance, it is not appropriate for there to be a stand alone Requirement for the SPG. It must also be remembered that the LBB must approve the final form of the CoCP.</p>
<p>Requirement 26 (Combined heat and power)</p> <p>Although the Applicant has indicated a commitment to delivering CHP, its delivery is not secured. The amendments proposed by the Applicant do not go far enough in demonstrating commitment and the GLA has proposed alternative wording with regards to the proposed amendments below that would, in its view, be necessary as a minimum. The paragraph numbers refer to the subsections of the proposed requirement in the dDCO (Rev2).</p> <p>(2) (a): The GLA disagrees with the use of the CHPQA scheme as a criterion for assessing the potential for commercial opportunities. The CHPQA scheme is about CHP meeting efficiency thresholds to quality for a range of benefits, including Renewable Obligation Certificates, Renewable Heat Incentive, Carbon Price Floor (heat) relief, Climate Change Levy exemption (in respect of electricity directly supplied), Enhanced Capital Allowances and preferential Business Rates. The GLA maintains that the assessment of commercial opportunities should be based on the same methodology as the Ramboll RRRF District</p>	<p>The Applicant's insertion of CHPQA into Requirement 20, was at the request of the GLA in its Local Impact Report, which stated that "<i>The review should provide for ongoing monitoring and full exploration of potential commercial opportunities to use heat from the development as part of a Good Quality CHP scheme (as defined in CHPQA Standard issue 3), and for the provision of subsequent reviews of such opportunities as necessary.</i>" The Applicant's amendment was therefore made at the GLA's recommendation.</p> <p>In relation to Requirement 20(2)(b) (now Requirement 26(2)), the Applicant is content to replace "sufficient details are known" with "there is sufficient certainty..." This is made in the dDCO (3.1, Rev 3, REP5-003) submitted at deadline 5.</p> <p>In relation to the Working Group, the Applicant is content to make the changes requested by GLA. However, the competent CHP consultant is to be appointed by the undertaker and the Applicant has not included what the review should consider as that scope is to be agreed by the working group. These changes are reflected in the dDCO (3.1, Rev 3, REP5-003).</p>

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GLA's position	The Applicant's position
<p>Heating Feasibility Study, Work Package 1 and 2, namely the Net Present Value and Internal Rate of Return of the project based on whole-life costing.</p> <p>(2) (b): The GLA requests deletion of '...sufficient details are known...' and replacement with '...there is sufficient certainty...'. There may be cases where the heat load is certain to go ahead, but the details of exactly how this will happen are unknown at such an early stage. This is the 'investment ahead of need' argument put forward by the GLA in its Written Representations (Deadline 2). This is to prevent any perceived lack of 'sufficient details' (however that is defined) from stopping the necessary investment.</p> <p>(4): The GLA does not consider that this amendment is sufficient or acceptable. The GLA requests that the dDCO is amended to require that the Applicant forms a working group that combines with the RRRL working group, that the combined group agrees the scope of the first CHP review and that it is undertaken by a competent district heating consultant. The first CHP review should consider both the RRRF heat demand and the heat demand from further afield, and that the engineering of the district heating network should be integrated with both the RRRF and REP plants as heat supply sources. The requirement should also require the Applicant to engage with BEIS and the Heat Network Investment Programme (HNIP) from the outset as part of the working group, with a view to considering HNIP funding for any financial shortfall identified by the first CHP review. The Applicant, in undertaking these measures as a minimum in regard to CHP, would align with the policy set out in NPS EN-1 paragraph 4.6.6 (evidence that the possibilities for CHP have been fully explored) and 4.6.7 (consult with potential customers), and demonstrate in accordance with the London Plan, paragraphs 5.85 and 5.85B, that the ERF is committing to practically meeting the minimum CIF in the future through CHP by establishing a working group to progress the agreed steps and monitor and report performance to the consenting authority.</p>	<p>In relation to the extension of the initial district heat network into other areas, please refer to reference 10.18 of the Applicant's response to the Local Impact Report by Greater London Authority (8.02.15, REP3-023) which contains the Applicant's detailed position that there is no justification for the GLA's request. No amendment.</p> <p>In relation to no development taking place until there is a demonstrable need for heat to be exported, please refer to reference 10.15 of the Applicant's response to the Local Impact Report by Greater London Authority (8.02.15, REP3-023), which contains the Applicant's detailed position that there is no justification for the GLA's request..</p>

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GLA's position	The Applicant's position
<p>The GLA still considers (as set out in its LIR) that there should be commitment by the Applicant to invest (within an agreed timeframe) in the extension of the initial district heat network into other areas of south east London with high heat demand so that heat from the ERF can be supplied into neighbouring areas where there is a demand for heat from the ERF.</p> <p>Further, the GLA maintains its position as set out in the LIR that no development should take place until such time as there is a demonstrable need for heat to be exported, this being over and above that which is currently available and unused from the adjacent RRRF as, without CHP, the GLA considers that the ERF would contribute to climate change in power-only mode and that this is unacceptable. Without such a requirement the purported benefits of the REP are overstated.</p>	
<p>Commitment to deliver proposed Anaerobic Digestion facility, Battery Storage unit and solar PV panels within an agreed timeframe</p> <p>The Applicant states that it is considering this request and will revert. The GLA would be happy to engage with the Applicant in drafting a suitably worded requirement.</p>	<p>The Applicant has included Requirement 25 in the dDCO (3.1, Rev 3, REP5-003) submitted for Deadline 5. This requirement requires the Applicant to agree a phasing programme for the construction and commissioning of Work No.1 and such programme is required to be complied with. The Anaerobic Digestion facility must be constructed in the same phase as the ERF.</p>
<p>Pre- treatment of waste</p> <p>The Applicant relies on the Duty of Care responsibilities and the Environmental Permit to deliver truly residual waste to the ERF. As noted elsewhere in its submissions (including Section 2 of this document WR2 Conflict with national policy, and GLA's Post Hearing Written Submission of Oral Case, Item 3.2), the GLA maintains its position that the Duty of Care and Environmental Permit do not provide the necessary level of control, and that in the absence of such control there is a high risk that reusable or recyclable waste will be accepted at the ERF, thereby conflicting with NPS EN-1 Part 3.4.</p>	<p>There is no policy requirement, either in the NPS or in the London Plan, to require energy from waste facilities to include pre-treatment.</p> <p>However, the Applicant has included Requirement 18 in the dDCO (3.1, Rev 3, REP5-003) submitted at Deadline 5 that requires the undertaker to submit to the relevant planning authority for approval a waste hierarchy scheme, setting out arrangements for maintenance of the waste hierarchy in priority order by minimising recyclable and reusable waste received at the authorised development during commissioning and the operational period.</p>
<p>Air emissions to be limited to draft BREF</p>	<p>The Applicant has included three new Requirements in the dDCO (3.1, Rev 3, REP5-003) at Deadline 5, in relation to air quality emissions. These are:</p>

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GLA's position	The Applicant's position
<p>The GLA maintains its position that, because the Permit can be altered at a later date, a requirement is needed to ensure that the development stays within the parameters described in the DCO application throughout its lifespan and are not allowed to subsequently increase. This is because any increase in the air emissions parameters has not been subject to environmental assessment or scrutiny through the Examination process. There can be no reasonable complaint if the Applicant is limited to the air emissions for which it has assessed the environmental impacts on a worst-case scenario basis.</p>	<ul style="list-style-type: none"> • Requirement 15: Emissions Limits – Work Number 1A • Requirement 16: Emission Limits – Work Number 1B; and • Requirement 17: Ambient air quality monitoring <p>To confirm, Requirement 15 commits to an average daily emission limit value and an annual emission limit value for nitrogen oxide and nitrogen dioxide for the ERF and Requirement 16, in respect of the Anaerobic Digestion facility, restricts the average emission limit value and annual emission limit value for nitrogen oxide and nitrogen dioxide.</p> <p>Regarding Air Quality monitoring, the Applicant has inserted Requirement 17, which provides for the Applicant to prepare an air quality monitoring programme, which must also meet the requirements of any air quality monitoring condition on the Environmental Permit for the REP. The programme is to be submitted to the Environment Agency for approval – it is not reasonable or justifiable to expect the Applicant to prepare two programmes to two different bodies. This will also ensure that there is no contradiction between the DCO and the Environmental Permit on this topic, which is what the NPSs advise should be avoided.</p>
<p>Transport for delivery of waste and export of ash should be zero carbon</p> <p>The Applicant suggests that it cannot control delivery vehicles. The GLA maintains that significant infrastructure development in London should be required to contribute to policy objectives to decarbonise the economy, and that the Applicant is able through contractual measures to assist in this regard. The GLA therefore maintains its request for a requirement (or obligation) to deliver this policy objective.</p>	<p>The Applicant repeats that there is no policy requiring a development that receives deliveries to ensure that deliveries are by zero carbon vehicles. Please refer to reference 10.20 of the Applicant's response to the Local Impact Report by Greater London Authority (8.02.15, REP3-023).</p>
<p>Commitment to River Transport</p>	<p>The Applicant is wholly committed to REP being primarily a river fed facility. Having invested heavily in its existing marine operations, including: physical infrastructure; plant and machinery; and a highly trained marine workforce,</p>

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GLA's position	The Applicant's position
<p>The GLA disagrees that a restriction on the number of road deliveries is an appropriate mechanism to ensure use of river transport.</p>	<p>there is no commercial imperative for the Applicant to seek to operate by transporting a high proportion of the waste material by road.</p> <p>This commitment has been further demonstrated in an amendment made to Requirement 14 of the dDCO (3.1, Rev 3, REP5-003) which now commits to a tonnage cap of 240,000 tpa being transported to the facility by road. That commitment is secured through Requirement 14 within the updated dDCO (3.1, Rev 3, REP5-003) submitted at Deadline 5.</p>
<p>Gas Export</p> <p>The Applicant agrees that injection of biogas to the gas grid or upgrade to vehicle fuel are the preferred options, but falls short of committing to this outcome. The explanation given is that there may not be sufficient capacity in the gas network, or there may not be a market for vehicle fuel. This is considered unacceptable. The application for the proposed REP should deal with all proposed outputs (including electricity, bottom ash, and recyclables) and establish the best route to market for all products. The GLA does not accept that biogas should be treated any differently in this regard that other products.</p>	<p>The Applicant has included in the dDCO (3.1, Rev 3, REP5-003) submitted at Deadline 5 a new Requirement that obliges the Applicant to look at the feasibility and commercial viability of a connection to the gas grid, and the export of compost material produced. Should the export of compost material produced not be feasible or commercially viable at the first review, the Applicant will carry out a review every 5 years. In relation to the opportunities for the export of the gas to the gas grid network, the Applicant is only required to submit a review 12 months after the date of final commissioning.</p>
<p>London Living Wage</p> <p>The GLA considers that, as developer of a nationally significant infrastructure project, the Applicant should accept its responsibilities in this regard.</p>	<p>There is no planning policy requirement for the Applicant to guarantee the London Living Wage in respect of the Proposed Development. In any event, the vast majority of the jobs at the Proposed Development will be highly skilled jobs, at degree or above level.</p>

4 Confirmation of Agreement

This SOCG is prepared jointly and agreed by the Parties:

Signed for and on behalf of the Applicant:

Date:

Signed for and on behalf of the Greater London Authority:

Date:

DRAFT

Appendix A Consultation Log

Key meetings and correspondence which have taken place between the Applicant and the GLA are summarised in **Table A.1** below.

Table A.1: Correspondence Log between the Applicant and Greater London Authority

Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
10/03/17	Meeting	Peter North (GLA); Andy Pike (Cory); Richard Wilkinson (Cory)	A meeting was held to discuss the initial project concept and CHP opportunities.
07/07/17	Meeting	Andrew Richmond (GLA); Andy Pike (Cory); Richard Wilkinson (Cory)	At this meeting, the GLA seemed supportive of the integrated energy park and CHP. Discussions also noted the limited data available on C&I waste.
15/01/18	Site Visit to RRRF	Leonie Cooper (London City Assembly); Caroline Russell (London City Assembly); Grace Loseby (GLA)	A site visit to the Applicant's RRRF site was held for members of the London Assembly and GLA. The Applicant also presented their plans for REP.
07/02/18	Meeting	Natalie Malettras (PBA); Andy Pike (Cory); Richard Wilkinson (Cory); Devon Christensen (Cory); Andrew Richmond (GLA)	A meeting was held to discuss key changes to the REP proposals since the first meeting (namely the removal of river works as part of the application and the decision on the Littlebrook electrical connection route). At this meeting, the GLA expressed support for the innovative nature of REP (including battery storage and PV within the project) and noted they were unclear who within the GLA received the Scoping Report. Thus, the Applicant issued the Scoping Report and Scoping Opinion to Andrew Richmond directly.
07/02/18	Email	Natalie Malettras (PBA); Andrew Richmond (GLA)	The Applicant provided a link to the EIA Scoping Report and Scoping Opinion on PINS website. An update on the proposals and Indicative Application Boundary was also provided.
08/02/18	Email	Carol Unwin (PBA); Elliot Kemp (GLA)	The Applicant provided a link to the EIA Scoping Report on PINS website and offered the opportunity for the GLA to comment on the proposed viewpoints for the Townscape and Visual Impact Assessment.
09/02/18	Email	Devon Christensen (Cory); Andrew Richmond (GLA)	The Applicant issued meeting minutes (from meeting date 07/02/18) and attached an indicative timeline for the DCO process. The Applicant also provided a link to the EIA Scoping Report and Scoping Opinion on PINS website again.
14/02/18	Email	Unan Ejaz (PBA); Stephen Inch (GLA)	The Applicant provided a link to the EIA Scoping Report on PINS website and requested clarity on whether an 'air quality neutral' assessment is required and if the proposed CHP would need to comply with the Mayor's Draft Environmental Strategy policy.
15/02/18	Email	Carol Unwin (PBA); Elliot Kemp (GLA)	The Applicant requested comments on the proposed viewpoints for the TVIA from the GLA.
19/02/18	Email	Natalie Malettras (PBA); Andrew Richmond (GLA)	The Applicant requested an update on who the case officer at the GLA will be for the scheme so the Applicant can provide the opportunity for the most appropriate person to provide comments on the Scoping Report and future consultation.
19/02/18	Email	Elliot Kemp (GLA); Carol Unwin (PBA)	GLA unable to provide comments on TVIA methodology as unsure if the Mayor has a role in responding to the scoping report.
26/02/18	Email	Helen Evriviades (PBA); Peter Massini (GLA)	The Applicant's Ecologist provided a link to the EIA Scoping Report on PINS website to the GLA and offered the opportunity for the GLA to comment on the survey scope, proposed screening distances and Biodiversity Metric methodology.
07/03/18	Email	Samantha Davenport (GLA); Stephen Inch (GLA); Helen Evriviades (PBA)	GLA confirmed members of the environment team "reviewed the scoping report" and provided comments on air quality and ecology assessments.
13/03/18	Phone Call	Natalie Malettras (PBA); Kate Randell (GLA)	Phone call between the Applicant and GLA confirmed that the Scoping Report had been received and logged by the GLA.
23/03/18	Letter	Paul Watling (GLA); Andy Richmond (GLA); Elliot Kemp (GLA);	The Applicant notified the GLA of updates to the REP proposals (including changes to the indicative application boundary) and provided a technical note outlining these changes and the amended scope of the EIA.
16/05/18	Phone Call	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Phone call between the Applicant GLA discussing logistics for the meeting proposed on 05/06/18.
16/05/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant provided a summary of the phone call held on 16/05/18. The Applicant invited the GLA to comment on the Statement of Community Consultation (SoCC) (on a non-statutory basis) and to visit the Applicant's existing RRRF site.
17/05/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA confirmed TfL would be attending the meeting scheduled on 05/06/18, to cover transport issues. GLA's Environment Team also asked for the timescales for receiving technical information about the proposals.
29/05/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting attendees.
29/05/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting attendees.
31/05/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA asked for confirmation on when they should expect to receive technical information about the proposals.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
31/05/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	<ul style="list-style-type: none"> The Applicant provided a link to the REP project website which allowed the GLA to access the non-statutory consultation material which included technical details about the scheme. The Applicant also explained that PEIR would be published on 18/06/18 at the start of the statutory consultation period and the PEIR would provide more information about the scheme and the preliminary environmental assessments.
04/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree agenda for the meeting being held on 05/06/18.
04/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA issued the final agenda for the meeting being held on 05/06/18.
04/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA re-issued the final agenda for the meeting being held on 05/06/18.
05/06/18	Meeting	Natalie Malettras (PBA); Richard Wilkinson (Cory); Devon Christensen (Cory); Roby Gully (Cory); Vanessa Harrison (GLA); Katherine Wood (GLA); Ioanna Mytilinaiou (GLA); Victoria Rees (TfL)	A pre-planning application meeting was held to discuss updates on the proposals, wider environmental impacts, energy, policy, transport and consultation. At this meeting, the GLA stated this proposal supports the Mayor's ambition to reduce the export of waste and to divert waste from landfill and that they do not expect the GLA to have views on the building style / massing.
12/06/18	Section 42 letter and statutory consultation documents to GLA	Vanessa Harrison (GLA)	<p>On 12/06/18, the Applicant issued the following statutory consultation documents to the GLA:</p> <ul style="list-style-type: none"> Copy of a notice pursuant to section 48 of the PA 2008 and Regulation 13 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Copy of the PEIR NTS USB drive containing an electronic copy of the PEIR and its technical appendices <p>GLA signed for these documents on 13/06/18.</p>
12/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued meeting notes and actions from the meeting held on 05/06/18 and asked the GLA to provide dates for site visit.
13/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of the Applicant's statutory consultation documents and provided dates for proposed site visit.
14/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree date for site visit.
14/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree date for site visit.
14/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree date for site visit.
14/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree date for site visit.
14/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree date for site visit.
14/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree date for site visit and noted the operational status of RRRF site.
15/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant requested confirmation of what 'fee regime' applies to the scheme for pre-planning advice.
18/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant chased for confirmation of the 'fee regime' the scheme is under for pre-planning advice.
19/06/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA provided comments on meeting notes and actions the Applicant issued on 12/06/18. In these comments, the GLA had no major comments on minutes and asked for emphasis to be placed on the GLA being " <i>interested in avoiding any permeant impacts upon MOL/nature reserve</i> ".
19/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree final minutes from meeting held on 05/06/18.
19/06/18	Email	Richard Wilkinson (Cory); Vanessa Harrison (GLA)	Correspondence to confirm site visit logistics.
19/06/18	Email	Vanessa Harrison (GLA); Richard Wilkinson (Cory)	Correspondence to confirm site visit logistics.
20/06/18	Site Visit	Vanessa Harrison (GLA)	GLA Planning Officer visited the REP site and existing RRRF site.
25/06/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued a technical note which summarised how REP met the adopted and draft London Plan policies.

Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
04/07/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA requested an electronic copy of the PEIR NTS.
04/07/18	Email	Sarah Chandler (PBA); Vanessa Harrison (GLA)	The Applicant provided an electronic copy of the PEIR NTS to the GLA.
13/07/18	Email	Vanessa Harrison (GLA); Sarah Chandler (PBA)	GLA requested commentary about where the waste for the ERF would be sourced from.
16/07/18	Email	Natalie Malettras (PBA); Holly Smith (GLA)	The Applicant provided a link to the consultation material available during statutory consultation and answered GLA's queries on: <ul style="list-style-type: none"> • Source of additional waste • Transporting waste to the facility • Impacts from the construction of the Electrical Connection route • Timetable for the construction of the Electrical Connection route
19/07/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant provided commentary about where the waste for the ERF would be sourced from and stated that <i>"the energy recovery facility within the proposed Riverside Energy Park (REP) will process non-recyclable (black bag) waste. It would normally treat waste arising from businesses (commercial waste), with the potential to accept waste arising from residents (local authority collected waste)"</i> .
19/07/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of the Applicant's commentary about where the waste for the ERF would be sourced from.
30/07/18	Response to Section 42 Consultation	Vanessa Harrison (GLA)	The Applicant received the GLA's statutory consultation response. In their statutory consultation response, the GLA: <ul style="list-style-type: none"> • Set out their views on the principles of the proposal and matters that should be considered in the preparation of the application to PINS; and • Noted they were generally unsupportive of the scheme.
31/07/18	Minor refinements consultation documents to GLA	Vanessa Harrison (GLA)	On 31/07/18, the Applicant issued the following non-statutory consultation documents to the GLA: <ul style="list-style-type: none"> • A plan showing the additional areas of land • A USB drive containing Supplementary Information to the PEIR <p>The GLA signed for the documents on 01/08/18.</p>
01/08/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA asked the Applicant for confirmation of the GLA's statutory consultation response.
20/08/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant confirmed receipt of the GLA's s42 response and proposed a strategic call to discuss their response in greater detail and to propose next steps.
24/08/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
24/08/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date and proposed attendees
24/08/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date and proposed attendees
24/08/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting logistics.
24/08/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics.
24/08/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date and logistics.
24/08/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
24/08/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics.
04/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
05/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting logistics and agenda.
06/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued a summary table of their responses to the GLA's statutory consultation response, an Air Quality Technical Note and Waste Capacity Technical Note.
10/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting agenda for the meeting held on 11/09/18
10/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting agenda for the meeting held on 11/09/18
10/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to confirm attendees for the meeting held on 11/09/18
10/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to confirm attendees for the meeting held on 11/09/18
11/09/18	Meeting	Natalie Malettras (PBA); Kirsten Berry (PBA); Graham Harker (PBA); Richard Wilkinson (Cory); Stephen Othen (Fichtner); Doug Simpson (GLA); Peter North (GLA); Stephen Inch (GLA); Patrick Feehily (GLA); Vanessa Harrison (GLA)	A project update meeting was held to discuss; the GLA's s42 response, the Applicant's 'Waste Capacity Note' issued in response to the GLA's s42 response, waste policy, principles of energy from waste, carbon intensity floor thresholds, exploring heat opportunities and air quality. At this meeting, the GLA agreed: <ul style="list-style-type: none"> To circulate the waste capacity models that were used in the preparation of the London Environment Strategy; To confirm the basis of the heat and power efficiency inputs in the CIF model; and To come back to the Applicant with comments on responses provided by other EIA disciplines and to confirm the timetable of the London Plan examination.
12/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting minutes. The Applicant requested information about the waste capacity models that were used in the preparation of the London Environment Strategy and CIF modelling.
17/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued minutes and actions from meeting held on 11/09/18.
19/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA confirmed receipt of minutes and actions for their review. GLA also requested additional information on SoCG programme.
19/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant stated they would provide additional information regarding the SoCG in due course.
24/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed they would look into the CIF modelling and send information across.
26/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA explained they were still working on the CIF modelling. GLA requested updated project timetable and information on the SoCG programme.
26/09/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant asked GLA to confirm they have no further additions to the minutes issued on 17/09/18 and confirmed they would issue an updated project programme over.
26/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA stated they would chase comments on the minutes issued on 17/09/18 and requested a high-level timetable for the DCO.
28/09/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA confirmed they have issued the Applicant's summary table of their responses to the GLA's statutory consultation response to relevant teams for comment. GLA confirmed the London Plan timetable.
02/10/18	Email	Natalie Malettras (PBA); Patrick Feehily (GLA); Doug Simpson (GLA)	The Applicant chased the GLA for a response to the agreed actions from the meeting on 11/09/18. Information was expected w/c 24 th September.
02/10/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	<ul style="list-style-type: none"> The Applicant issued an updated project timetable to the GLA and provided information on the preparation of SoCGs. The Applicant also asked for an update on when the information about the provision of waste capacity models and CIF would be issued.
03/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	In this email exchange, the GLA provided: <ul style="list-style-type: none"> Comments on the waste sections of the meeting minutes issued on 17/09/18 and stated energy and air quality colleagues may want to comment on these minutes; and Confirmation on CIF calculation methodology and stated that the Applicant should be using the gross energy efficiency numbers. <p>GLA also stated they would issue information on the waste capacity number once they have approval from the Mayor's Office and requested confirmation on the submission date of the application, what information the Applicant requires from the GLA and the deadlines for the SoCG.</p>

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04/10/18	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	<ul style="list-style-type: none"> The Applicant responded to the GLA's comments from the email dated 03/10/18. In this email exchange, the Applicant explained that the outstanding query and action was for the GLA to confirm whether the Applicant should use net or gross for the CV input into the CIF. The Applicant stated the submission of the Application would be mid-November but an exact date could not be confirmed. The Applicant also provided an update on the SoCG programme.
04/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA asked for a call with the Applicant on 05/10/18.
04/10/18	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	Correspondence arranging a conference call.
05/10/18	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	Correspondence arranging a conference call.
05/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	Correspondence arranging a conference call.
05/10/18	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	Correspondence arranging a conference call.
05/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	Correspondence arranging a conference call.
05/10/18	Phone call	Doug Simpson (GLA); Natalie Malettras (PBA)	A phone call between the Applicant and the GLA was held to discuss the content of Consultation Report and CIF calculations.
05/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA queried the consultation process.
09/10/18	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	<ul style="list-style-type: none"> The Applicant requested confirmation on when they would receive the information regarding the provision of waste capacity models and CIF. The Applicant also provided clarity on the consultation process and outlined the purpose and content of the Consultation Report and provided the GLA with links to PINS Advice Notes.
09/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed the Applicant should apply the gross CV for the CIF calculation.
10/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA requested a copy of the Applicant's response to the GLA's statutory consultation response in Microsoft word format.
10/10/18	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant issued a copy of the Applicant's response to the GLA's statutory consultation response in Microsoft word format.
11/10/18	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of the Applicant's response to the GLA's statutory consultation response.
17/10/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA) and Doug Simpson (GLA)	The Applicant requested an update on the remaining information yet to be received by the GLA – notably confirmation on the provision of the GLA's waste capacity models.
18/10/18	Email	Vanessa Harrison (GLA); Doug Simpson (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA stated they were still drafting information that the Applicant requested. The GLA also provided several links relating to EfW capacity need in London and the modelling rationale for the estimates.
09/11/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA provided responses to the Air Quality Technical Note and Waste Capacity Technical Note the Applicant issued and provided comments on transport issues raised by TfL.
19/11/18	Meeting		High level meeting was held with senior members of staff to discuss the principles of the development.
28/11/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant informed the GLA that the Application was submitted to PINS and wanted to progress with the SoCG.
28/11/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence relating to the SoCG.
28/11/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA requested updated timescales for the DCO going forward.
28/11/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	<ul style="list-style-type: none"> The Applicant re-issued an updated project timetable to the GLA and provided information on the preparation of SoCGs (previous email issued 02/10/18). The Applicant also requested a conference call for 29/11/18.
29/11/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed receipt of updated project timetable.
30/11/18	Phone Call	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Phone call between the Applicant and GLA to discuss key project milestones post-acceptance.
30/11/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant proposed another meeting to discuss the submitted Application and the preparation of the SoCG.
10/12/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
11/12/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
11/12/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
13/12/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.

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19/12/18	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
19/12/18	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
07/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
08/01/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date - GLA proposed to have separate meetings to discuss energy/waste and air quality.
08/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting dates for separate energy/waste and air quality meetings.
11/01/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
11/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
14/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant requested an update on the proposed meeting dates.
14/01/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
15/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date – the Applicant recommended to meet prior to the Section 56 Relevant Representations deadline (12/02/19) to discuss and answer queries the GLA had on the Application prior to making their Relevant Representation. The Applicant also offered a meeting room at their facility and stated they would make arrangements to rent a room closer to City Hall if the date of the proposed meetings could be moved forward.
16/01/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence to agree meeting date.
16/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence to agree meeting date.
30/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	The Applicant issued a short memo regarding CIF calculations.
30/01/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence regarding meeting on 01/02/19
31/01/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Issued draft SoCG (Draft Version)
01/02/19	Meeting – Waste and Heat	Doug Simpson (GLA); Andrew Dunwoody (GLA); Peter North (GLA); Natalie Malettras (PBA); Andy Pike (CRE); Richard Wilkinson (CRE); Stephen Othen (Fichtner); Kirsten Berry (PBA)	This meeting was held to discuss issues relating to; Waste and Need, Heat and Energy, CIF, SoCGs.
01/02/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA); Andrew Dunwoody (GLA)	Issued draft SoCG (Draft Version)
04/02/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA)	Correspondence regarding meeting arrangements
04/02/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	Correspondence regarding meeting arrangements
05/02/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA issued a proposed agenda for the Air Quality meeting to be held on 06/02/19.
06/02/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	<ul style="list-style-type: none"> The Applicant provided calculations of CIF for verification purposes – but asked the GLA to confirm whether net or gross calorific value needs to be applied. Issued meeting minutes for comment.
06/02/19	Meeting – Air Quality	Natalie Malettras (PBA); Richard Wilkinson (CRE); Graham Harker (PBA); Vanessa Harrison (GLA); Stephen Inch (GLA)	This meeting was held to discuss air quality concerns.

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
06/02/19	Email	Natalie Malettras (PBA); Vanessa Harrison (GLA); Stephen Inch (GLA)	The Applicant issued meeting minutes.
07/02/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	In this email exchange, the GLA stated that they aimed to provide comments to the Applicant on the draft SOCG by 14/02/19. The GLA also maintained that a gross CV figure should be applied to the scheme but accept more clarity is needed on how gross and net CV values are applied and requested for the Applicant to use the revised tool for CIF calculations.
07/02/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant provided a summary of the Air Quality meeting held on 06/02/19 and confirmed they will use the revised tool for CIF calculations.
13/02/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	In this email exchange, the GLA provided an update on CIF calculations, SoCG and meeting minutes. CIF Calculations: <ul style="list-style-type: none"> GLA stated that the Applicant has used an old version of the tool developed for the Mayor's previous Waste Strategy, so it does not apply. GLA were in the process of producing an updated version of the Ready Reckoner that will allow users to directly calculate CIF outputs for a range of energy generation solutions, which was expected to be available end of February. GLA suggested that the Applicant discussed with GLA's consultants (Eunomia) on any specific technical questions relating to the CIF calculation. SoCG: <ul style="list-style-type: none"> GLA started to review the SoCG but wanted the document to be refined down to the "factual matters" – being the relevant national and London plan policies that will be used to test the application against. Requested a revised version. Meeting Minutes: <ul style="list-style-type: none"> GLA confirmed the minutes from waste and energy meeting have been reviewed and are awaiting sign off. GLA stated they would be sent by the end of the week and no issues with the minutes were foreseen.
14/02/19	Email	Andrew Dunwoody (GLA); Natalie Malettras (PBA)	GLA provided comments on meeting minutes
01/03/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA asked when a revised SoCG would be provided and for the Applicant to run the proposed ERF and AD facility through the updated CIF tool.
04/03/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant issued revised draft SoCG (Revision 1)
08/03/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed that technical comments on the draft SoCG (Revision 1) would be provided w/c 25/03/19 and would provide the updated CIF tool.
11/03/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant responded to queries on the draft SOCG (Revision 1).
12/03/19	Email	Doug Simpson (GLA); Stephen Othen (Fichtner); Natalie Malettras (PBA)	GLA provided the updated CIF Tool extracted from EPS tool.
20/03/19	Email	Peter North (GLA); Natalie Malettras (PBA)	GLA requested further clarification on the following: <i>"Point 1 below: having looked at Article 14 and the Harmonised Reference Efficiency Values published by the EU, I am unable to understand how an EfW plant operating in condensing mode (electricity only, no heat production), can produce primary energy savings of 27% given is it displacing grid electricity. It would be helpful if you could set out your assumptions and calculations as to how you have determined the 27% savings?"</i> <i>Point 2) below: there are only two recent district heating studies I am aware of. The Fichtner study commissioned by Cory in support of the REP application and the DEEP-funded study based on the existing RRRF EfW plant that Ramboll is carrying out. Your reply suggests there is a third study being carried out by CRE with the London Borough Bexley and the Peabody Estate (amongst others) to explore options for the export of heat from both REP and RRRF. Could you confirm the terms of reference of the CRE study, who else is involved, when the work will be completed and that the results will be shared with the GLA?"</i>
26/03/19	Email	Peter North (GLA); Natalie Malettras (PBA)	GLA requested an update on email sent 20/03/19.
26/03/19	Email	Natalie Malettras (PBA); Peter North (GLA)	The Applicant responded to queries on how the EfW would produce energy savings of 27% and other district heating studies referenced in the Applicant's submission documents.
29/03/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA provided comments on the waste sections of the draft SoCG (Revision 1) and confirmed the sections on energy, air quality and transport were still being reviewed

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Date	Form of correspondence	Key Contacts	Summary of outcomes and discussions
30/03/19	Email	Stephen Othen (Fichtner); Mark Cordle (Eunomia); Ann Ballinger (Eunomia)	The Applicant requested clarification on the updated CIF tool and the assumptions behind the calculations, including whether the waste data is based on GCV or NCV.
01/04/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant requested further clarity on the GLA's Relevant Representation and SOCG. The GLA made a reference to Economic Development in their Relevant Representation – however the Applicant could not find an obvious point on this and stated that in other communications/meetings the only issues agreed to be covered in the SOCG were Air Quality; Waste Management (need and principle); Energy and Heat Off take; and Transport (through TFL). The Applicant asked for a contact at the GLA to discuss points relating to Economic Development.
02/04/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed no engagement is needed on issues raised about Economic Development
02/04/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant issued a new draft version of the SOCG (Revision 2).
03/04/19	Email	Stephen Othen (Fichtner); Mark Cordle (Eunomia); Ann Ballinger (Eunomia)	Eunomia provided clarification on the Applicant's queries (from an email dated 30/03/19) and provided a copy of the full CIF ready reckoner tool. It was confirmed that net calorific value should be applied.
04/04/19	Email	Stephen Othen (Fichtner); Mark Cordle (Eunomia); Ann Ballinger (Eunomia)	Eunomia asked for residual waste data for the proposed facility to provide technical support to the GLA to aid its understanding of the CIF and EPS calculations.
08/04/19	Email	Stephen Othen (Fichtner); Mark Cordle (Eunomia); Ann Ballinger (Eunomia)	The Applicant confirmed the residual waste composition used in the EPS Ready Reckoner.
08/04/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	The Applicant provided GLA with copies of the completed ready reckoner CIF calculation for base waste and RRRF waste, along with explanations of the results.
24/04/19	Phone Call	Doug Simpson (GLA); Natalie Malettras (PBA)	A phone call was held to discuss the progress of the draft SoCG.
07/05/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant responded to the GLA's questions on the CIF figures and asked when they would receive comments back from the GLA on the draft SOCG (Revision 2).
08/05/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA attached the latest draft version of the SoCG (Revision 2) they are working with. GLA confirmed they would issue a draft version of the SOCG with final comments to meet the 20/05/19 deadline set by the Examiner.
17/05/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA issued draft SOCG (Revision 2) with their comments. <i>[NB no additions had been made to the SoCG since the version submitted to the GLA on 4/3/19 other than a series of 'do not agree' comments.]</i>
07/06/19	Email	Natalie Malettras (PBA); Doug Simpson (GLA)	The Applicant requested a meeting to discuss the issues raised in GLA's Written Representation and to move the SOCG forward.
12/06/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA agreed to a meeting and asked the Applicant to confirm the items they wished to discuss.
24/06/19	Email	Natalie Malettras (PBA); Doug Simpson	The Applicant confirmed the following topics should be included on the agenda: <ul style="list-style-type: none"> SOCG discussions; Documents submitted at Deadline 3; Waste Hierarchy Waste availability; Air quality; CHP; and CIF. <i>[NB transport has been covered by TfL.]</i>
04/07/19	Email	Natalie Malettras (PBA); Doug Simpson	The Applicant asked the GLA for an update on proposed meeting dates.
05/07/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	<ul style="list-style-type: none"> GLA suggested a meeting in the second half of August and asked to see a revised version of the draft SOCG (Revision 3) ahead of the meeting. GLA also requested a follow-up pre-application fee.
09/07/19	Email	Natalie Malettras (PBA); Doug Simpson	The Applicant suggested meeting dates but stressed to the GLA that the Project Team would be happy to meet earlier in the Examination period, if possible.
16/07/19	Email	Doug Simpson (GLA); Natalie Malettras (PBA)	GLA confirmed 21/07/19 as a date for the next meeting, with attendees being Doug Simpson (Waste and Carbon), Vanessa Harrison (Planning), Peter North (Energy and Carbon) and Steve Moorcroft (Air Quality) from the GLA.
16/07/19	Email	Natalie Malettras (PBA); Doug Simpson	Applicant confirmed 21/07/19 as a date for the next meeting.
22/07/19	Email	Vanessa Harrison (GLA); Natalie Malettras (PBA)	GLA confirmed payment regime.

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05/08/19	Email	Vanessa Harrison (GLA); Natalie Maletas (PBA)	GLA asked the Applicant who will be attending the meeting on 21/07/19
07/08/19	Email	Natalie Maletas (PBA); Vanessa Harrison (GLA)	The Applicant confirmed attendees for the meeting on 21/07/19
07/08/19	Email	Doug Simpson (GLA); Natalie Maletas (PBA)	GLA asked the Applicant to issue a proposed agenda for the meeting on 21/07/19

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Appendix B Legislation and Policies Relevant to the Proposed Development

Table B.1: Legislation and Policies Relevant to the Proposed Development

Type	Policy/Legislation/Guidance
Legislation	<p>a) European Directives:</p> <ul style="list-style-type: none"> – EIA Directive (2011/92/EU) (as amended by EIA Directive 2014/52/EU) – Habitats Directive (92/43/EEC) – Landfill Directive (1999/31/EC) – Waste Framework Directive (2008/98/EC) – Waste Incineration Directive (2010/75/EU) – Energy Efficiency Directive (2012/27/EU) – Air Quality Directive (2008/50/EC) – Industrial Emissions Directive (2010/75/EU) – Birds Directive (2009/147/EC) – Medium Combustion Plant Directive (2015/2193/EU) – Environmental Liability Directive (2004/35/EC) <p>b) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('Infrastructure EIA Regulations 2017')</p> <p>c) The Infrastructure Planning (Applications Prescribed Forms and Procedure) Regulations 2009 ('APFP Regulations') (as amended)</p> <p>d) The Localism Act 2011 (as amended)</p> <p>e) Air Quality (England) Regulations 2000</p> <p>f) Air Quality (Amendment) (England) Regulations 2002</p> <p>g) Control of Pollution Act 1974 (COPA)</p> <p>h) Environmental Protection Act 1990</p> <p>i) Conservation of Habitats and Species Regulations 2017</p> <p>j) Wildlife and Countryside Act 1981 (as amended)</p> <p>k) The Natural Environment and Rural Communities Act 2006 ('NERC')</p> <p>l) Flood and Water Management Act 2010</p> <p>m) Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</p> <p>n) The Environmental Permitting (England and Wales) Regulations 2016</p> <p>o) The Water Resources Act 1991</p> <p>p) The Land Drainage Act 1991</p> <p>q) Water Act 2003</p>
National Planning	<p>a) Overarching National Policy Statement for Energy (EN-1) (2011) ('NPS EN-1')</p>

Statement of Common Ground

Statement of Common Ground between the Applicant and Greater London Authority

Type	Policy/Legislation/Guidance
Policy, & Guidance	<ul style="list-style-type: none"> b) National Policy Statement for Renewable Energy Infrastructure (EN-3) (2011) ('NPS EN-3') c) National Policy Statement for Electricity Networks Infrastructure (EN-5) (2011) ('NPS EN-5') d) National Planning Policy Framework ('NPPF') (2018) e) National Planning Policy for Waste ('NPPW') (2014) f) Planning Practice Guidance ('PPG') (online resource)
London Policy, Guidance & Strategies	<ul style="list-style-type: none"> a) The London Plan (2016) b) London Environment Strategy (2018) ('LEnvS') c) Mayor's Transport Strategy (2018) ('MTS') d) London Riverside Opportunity Area Planning Framework (2015) ('London Riverside OAPF') e) London Plan: The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance ('SPG') (2014) f) London Plan: Shaping Neighbourhoods: Character and Context SPG (2014) g) London Plan: Sustainable Design and Construction SPG (2014) h) London Plan: London View Management Framework (LVMF) (2012) i) London's Wasted Resource: The Mayor's Municipal Waste Management Strategy (2011) ('MMWMS') j) Managing risks and increasing resilience: The Mayor's Climate Change Adaptation Strategy (2011) k) Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy (2011) l) Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2011) m) Draft London Plan (Consolidated Suggested Changes Version) (2019) n) The Mayor's Draft Economic Development Strategy for London (2017)
Local Policy, Guidance & Strategies	<ul style="list-style-type: none"> a) Bexley Core Strategy (2012) b) Bexley Unitary Development Plan ('UDP') (2004) Saved Policies (2012) c) Bexley Energy Masterplan (2016) d) Bexley Growth Strategy (2017) e) Dartford Core Strategy (2011) f) Dartford Development Policies Plan and Policies Map (2017) g) Kent Minerals and Waste Local Plan 2013-2030 (2016) h) Kent Local Transport Plan 4: Delivering Growth without Gridlock 2016–2031 i) Thamesmead and Abbey Wood Supplementary Planning Document (SPD) (2009)

Appendix C Approval Letter from the EA

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James Sturman
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Our ref: EPR/GP3535QS/R1

Date: 09 April 2019

Dear Mr Sturman

Classification as a recovery operation using the R1 Energy Efficiency Formula

Application reference: EPR/GP3535QS/R1
Operator: Cory Environmental Holdings Limited
Facility: Riverside Energy Park

Thank you for your application, received 31/01/2019, concerning the Riverside Energy Park incinerator at Norman Road North, Belvedere, London. Based on the information that you provided and presented in the attached spreadsheet, we have concluded it is capable of having an R1 energy efficiency factor equal to or above 0.65. This letter therefore preliminarily certifies that it is an R1 recovery operation under Annex II of Directive 2008/98/EC on Waste based on design data. We will indicate this status on our website. It will need to be validated when plant acceptance data is available.

We remind you:

- to contact us if the data used in the assessment changes which may reduce it below 0.65, eg as a result of plant modifications or arrangements to take the energy.
- to confirm the design data when plant acceptance data is available
- operational plants will need to submit an updated version of the spreadsheet by end of January each year, covering performance over the last calendar year, so we can revalidate the R1 certification.

If you have any questions please phone me on [number] or email [name@environment-agency.gov.uk].

Yours sincerely

Phil Kelkin.

Team Leader
National Permitting Centre
Environment Agency

Encl: Final version of the spreadsheet

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