

Deadline 8 - 23 September 2019

Riverside Energy Park, Belvedere

Planning Inspectorate reference: EN010093

GLA ref: 4509

Post Hearing Written Submission of Oral Case

1. This submission summarises the case made by the Greater London Authority and Transport for London ('GLA') on 19 September 2019 at the Issue Specific Hearing ('ISH') for the draft Development Consent Order ('DCO') relating to the Riverside Energy Park ('REP') project, submitted by Cory Riverside Holdings Ltd ('the Applicant').
2. The GLA's oral submissions were made by Andrew Tait QC, supported by Douglas Simpson from the GLA, Stephen Inch from the GLA, Peter North from Calorem and Fred Raphael of Transport for London ('TfL'). Short CVs, setting out each speaker's experience and professional qualifications, are provided at Appendix 1 of this document.
3. These Post Hearing Written Submissions follow the Examining Authority's ('ExA') ISH agenda, and supplement GLA's oral case with additional written submissions where appropriate. As was noted at the ISH, there a number of further documents which the Applicant has committed to providing at Deadlines 8A and 8B, including an updated DCO. These submissions are based on GLA's understanding of commitments made by the Applicant and expressed orally at the ISH. The GLA reserve the right to update these submissions following receipt of the various documents provided by the Applicant.

Agenda item 3 – Articles – changes proposed by the Applicant and by Interested Parties

4. Article 6 purports to modify both the s36 consent and the planning permission relating to RRRF under Section 120 of the Planning Act 2008 ('PA 2008'). The Applicant submits that s.120(5)(c) encompasses s36 consents and planning permissions. This requires the Secretary of State to accept a broad interpretation of the word "provisions". The GLA understands, and the Applicant confirmed at the ISH, that no previous DCO has amended planning permissions by way of s.120(5) PA 2008. Moreover, the GLA is not aware of any environmental assessment which has been carried out in respect of the environmental impact of modifying the RRRF planning permission and s36 consent. On the assumption that conditions on any planning permission are necessary, relevant to the development permitted, precise and reasonable, removing or editing such conditions should require proper assessment of the implications of that modification or removal in circumstances

where the condition was deemed necessary to mitigate environmental harm and to make another development acceptable.

5. GLA noted the Applicant's submissions regarding Schedule 14. At the ISH, the Applicant agreed to provide a note to the London Borough of Bexley ('LBB') and GLA relating to the effect of a jetty outage in the absence of bottom ash storage at the RRRF facility. The GLA reserves comment until it has the opportunity to review that note.

Agenda item 4 - Schedule 1 – definition of authorised development

6. Work 1A (a) – The GLA is pleased that the Applicant has accepted a cap for Work 1A and a cap of 40,000 for Work 1B.
7. However, the GLA consider that this does not go far enough, given the assessments which the Applicant has provided to the Examination. The Applicant has proposed a cap of 805,920 for Work 1A; however, the GLA consider that this should be a throughput of 655,000 tonnes per annum to ensure that the facility does not exceed the basis of the Carbon Assessment.
8. If tonnage is only limited to 805,920 tonnes, the carbon impact of the development will not have been properly assessed. As the GLA has set out in earlier submissions, this would mean that the carbon savings (and hence the overall benefits) provided by REP would have been overstated.
9. The Applicant disagrees with the GLA's analysis and has committed to providing an updated carbon assessment note at Deadline 8. The GLA will review this note and will respond to the note in its Deadline 8A submission.
10. In any event, the GLA considers that limiting the throughput to 655,000 tonnes is also necessary to minimise the amount of waste managed at the ERF, which could otherwise be recycled, and to minimise the likelihood of surplus incineration capacity. The GLA's case on surplus ERF capacity is set out in its Local Impact Report and Written Representation submitted at Deadline 2.
11. Work 1A – The Applicant accepted the GLA's suggested amendments, with the addition of the word "at least" in (v). The GLA agrees with this amendment.
12. The GLA supported LBB's position that an additional point should be added as point (viii), requiring that a dedicated bottom ash storage area be provided where bottom ash containers must be stored. At the ISH, it was confirmed that LBB had agreed to remove this and the Applicant noted that it could not be included because as a storage area was not applied for. The GLA will provide the ExA with its comments once it has reviewed the relevant note.
13. Work 1B – The inclusion of a throughput capacity of 40,000 tonnes per annum was accepted. The GLA is neutral as to whether this is referenced in Schedule 1 or Schedule 2.
14. Work 2B – The GLA agrees with the amended wording of stream turbine to include at least a 30MW heat offtake.

Agenda item 5 - Schedule 2 - Schedule 2 Requirements - changes proposed by the Applicant and by Interested Parties

Requirement 11 - Code of construction practice

15. The GLA's amendments to the Requirement, set out in its track change DCO submitted at Deadline 7a at points (f) and (g) were accepted by the Applicant, which is welcomed.
16. The GLA's suggested clauses (3) and (4) regarding Non-Road Mobile Machinery ('NRMM') were not accepted by the Applicant, on the basis that the Applicant had included appropriate provision for NRMM in the Code of Construction Practice ('CoCP'), which references the GLA Control of Dust and Emissions during Construction and Demolition SPG. At the ISH, the Applicant committed to strengthening the wording in the CoCP to make the NRMM point explicit. The GLA is content with this, provided that the wording is acceptable. Once it has had an opportunity to review the wording in the CoCP, the GLA will provide further comments if required. The Applicant confirmed that a commitment to the NRMM Register was included in the CoCP.
17. The Applicant agreed to include LBB's proposed sub-paragraph (1)(p), regarding a vehicle booking system, as (i) in Requirement 13.

Requirement 13 - Construction traffic management plan(s)

18. The Applicant accepted the GLA's proposed deletion of the words "for streets within the London Borough of Bexley" in (1).
19. The GLA's proposed amendment to clause (1) introduced a statement that the plan should include measures to maximise the use of the river for construction materials and waste. The Applicant refused this amendment on the basis that, it submitted, the jetty is used for the delivery of waste to RRRF and this could not be jeopardised. The Applicant's case was that the jetty is a working facility for RRRF and RRRF had priority for use of the jetty, and so the GLA's proposed amendment would conflict with RRRF's use. The Applicant also stated that the commitment to maximising river usage is included within the CTMP.
20. The GLA found the Applicant's argument to be surprising, as it appeared to contradict the Applicant's case at earlier ISHs. The ExA has previously been told that the jetty has sufficient capacity to be used for the existing RRRF operations, as well as the proposed operations of the REP, which is expected to be approximately 500,000 tonnes of waste per annum by river. At paragraph 1.15 of the Applicant's Project Benefits Report states that '*REP will optimise the use of Cory's existing energy and river infrastructure in London, including its operational jetty, tugs and barges; and at paragraph 5.4.3 '...the Applicant would seek to make use of the jetty during construction, providing another opportunity to minimise the impacts associated with road transport'*. If, as the Applicant now contends there is no spare capacity at the jetty which could be used for the import/export of construction materials/waste, then the corollary must be that the jetty does not have sufficient capacity for the operational needs of REP, which has been stated as one of the benefits of the scheme and would, without the cap on waste delivered by road (as set out in paragraph 26 below), significantly increase the transport movements, with

associated air quality impacts. On the Applicant's current contention, it appears to be over-stating the benefits of REP.

21. With regard to the CTMP, the Applicant submitted that the measures for using the river are set out in paragraph 10.3.1. The GLA does not consider that the text is sufficient to maximise the use of river-based transport, and submits that the Applicant should be required to maximise river usage for the transport of waste and materials. Riverine transportation of waste to the site is one of REP's purported benefits. Without an explicit commitment to maximising such transportation, the ExA should not place any significant weight on the purported benefits of it.
22. The GLA also suggested amendments to the Requirement to include a mechanism for the review and updating of the CTMP (included as point (i) and in clause (4) in the GLA's mark-up). The CTMP does not include details of monitoring nor how that process would happen. Whilst construction may only take a couple of years, the GLA's concern relates to buses and road delays. The Applicant accepted the amendment and will include in the next draft DCO. The GLA reserves the right to comment on the amended wording.
23. GLA reiterated that the construction works, especially the laying of electrical cables, will impact bus services and the Applicant ought to contribute to mitigating the disruption caused to Londoners' journeys as a result of construction. The GLA's position remains that a financial contribution to pay for mitigation measures should be included as an obligation in proposed section 106 agreement, as set out in paragraph 3.4 of Deadline 7.

Requirement 13A - Delivery and Servicing Plan (LBB proposed Requirement)

24. LBB proposed an additional requirement for a Delivery and Servicing Plan at 13(a) of their marked up DCO. The GLA support this addition. The Applicant committed to partially accepting this text as a new requirement in the next draft DCO. The GLA will provide further comments if necessary once it has been provided with the relevant text.

Requirement 14 - Heavy commercial vehicle movements delivering waste

25. The Applicant agreed to reduce the cap on two-way vehicle movements to 75 vehicles in/out, which the GLA welcomes.
26. The Applicant also agreed to a cap of 130,000 tonnes of waste delivered to Work 1A by road and a cap of 40,000 to Work 1B, with the remainder delivered by river. The GLA estimates that, if REP operates at its nominal level of 655,000 tonnes per annum, this would equate to 20% of the total throughput, which is supported.
27. A commitment to usage of at least Euro VI vehicles is necessary to secure air quality benefits and comply with the Mayor's London Plan air quality policies. The Applicant argue that this would not be practical to stipulate such a condition on suppliers to the REP. The GLA disagrees and notes that it is not an unusual provision to require suppliers to comply with certain items through contracts with providers.

28. The Applicant expressed a concern that the amended Requirement would restrict which providers the Applicant could work with, as waste authorities procure for 7 years and, therefore, such a requirement would prevent waste coming from those which are not using Euro VI vehicles. However, Policy 7.3.1 of the London Environment Strategy requires all London waste contracts to be using Euro VI compliant HGVs, and that it would be reasonable for the same policy to be applied to the REP. The GLA considers that the concerns the Applicant raised at the Hearing could be addressed through an amendment to the proposed text of the Requirement, which contractually obliges those suppliers who are not yet using Euro VI to use these vehicles as a minimum for their next commissioning/contracting.
29. On jetty outages, the GLA agrees with LBB that the worst case scenario has not been properly assessed. The Applicant states that there is no impact of the 300 movements in/out for both the REP and RRRF in a jetty outage situation and have committed to providing a note on this to LBB. The GLA requested to receive the note at the same time to enable a review. The Applicant confirmed that, save in jetty outage, 100% of bottom ash would be delivered by river. The GLA will review the Applicant's Deadline 8 note and provide further comments once submitted. The GLA consider that quarterly reporting on jetty outages, number of vehicle movements and the volume of waste on those vehicles is not sufficient and reporting should be monthly. The Applicant confirmed that reporting would include both volume of waste on vehicles as well as the vehicle movements.

Requirement 15 - Emissions limits – Work Number 1A

30. The Applicant and LBB have agreed to the deletion of this Requirement. The GLA will respond on this point more fully at Deadline 8a, as it needs to consider the position.

Requirement 16 - Emission limits – Work Number 1B

31. The Applicant accepted the GLA's proposed amendments.

Requirement 17 - Ambient air quality monitoring

32. Applicant has agreed with LBB to fund monitoring for an agreed period, so that Requirement 17 can be deleted. The GLA agreed in principle, subject to seeing the s106 agreement. The Applicant confirmed that the S106 agreement would be provided to the GLA.

Requirement 18 - Waste hierarchy scheme

33. The Applicant accepted the GLA's proposed amendment to (1), which states that the GLA will be consulted on the waste hierarchy scheme, but noted that the duty to consult is on LBB, not on the Applicant.
34. The Applicant accepted the GLA's proposed amendments to (2)(a) with regard to material composition analysis but rejected the remainder of the amendments on the basis that the Applicant did not want to police waste providers. The GLA agrees with LBB that Requirement 18 as drafted does not go far enough for the waste hierarchy scheme to be effectively implemented and maintains that the amendments

suggested to this Requirement are necessary and effective for reasons set out in the GLA's 7a submission.

35. The GLA submits that quarterly assessments are required to ensure that all waste moving through the ERF is truly non-recyclable. If the review happens less frequently, there is more time for error and incorrect burning of recyclables, which is particularly significant given the scale of the facility's throughput
36. It was noted that LBB want the 65% recycling rate baseline obligations regarding written environment management systems ('EMS'), set out at (2)(c), to be a requirement on the Applicant. The GLA's submits that this clause should be amended to refer to 65% as the baseline for recyclable and reusable waste, as it is necessary to both implement the waste hierarchy scheme effectively and to comply with the Mayor's 65% municipal waste recycling by 2030. The same target has been set by Government for 2035. It was argued by the Applicant that the proposed amendments were too onerous and would difficult to monitor or enforce. The ERF intends to operate for at least 25 years and without proper safeguards to maximise recycling has the potential to incinerate significant tonnages of recyclable waste over a long-time frame.
37. In Annex A of the Projects Benefits Report (Table 6.1 at page 68) the Applicant applies a 70% recycling rate by 2026 for commercial and industrial waste in all of its four waste forecast scenarios assessed in setting out its case for need and benefits of the ERF. Paragraph 6.1.17 of its Project Benefits Report states a key benefit: '*It [the REP] is futureproofed to take waste out of landfill and away from export, not to detract from credible recycling initiatives*'. In the absence of a minimum 65 per cent recycling baseline level, to meet London and national recycling targets as a minimum, the REP will not operate within the parameters of the Applicant's modelled waste scenarios, it will not deliver fully on stated benefits, and the waste hierarchy scheme will not achieve its purpose.

Requirement 19 - Operational worker travel plan

38. The Applicant agreed to provide an updated CTMP to the Examination, and the GLA will comment as necessary once it has reviewed that document.

Requirement 23 - Community benefits

39. The GLA considers that the Applicant should commit to the Mayor's Good Work Standard in order to demonstrate leadership in best employment practices.

Requirement 25 - Phasing of construction and commissioning of Work Number 1

40. The Applicant is content to refer to Work 2B in the second paragraph of (1), but notes that it should say 'if applicable', noting that Work 2B only occurs if the it was not included in Work 1A. The GLA agrees with this approach.
41. With regard to the second part of (1), the Applicant accepts the GLA's insertion of the text regarding a phasing programme but cannot accept that Work 1C and Work 1D will be in the same phase as Work 1A, as advancements in technology mean the Applicant requires flexibility. The GLA accepts the removal of "and in any event in the same phase as Work Number 1A" from the proposed amendment.

42. The Applicant also stated that it could not accept the amendments to (2) for commercial reasons in that contracts may not be in place for Work 1V by the time the facility is operational. The Applicant is proposing to build the REP in the absence of any secured waste supply contracts identified in documents submitted to the Examining Authority and has not raised any challenges for securing such contracts for the ERF. The GLA sees no reason why the Applicant would not be equally successful in securing contracts for composting the digestate from the anaerobic digestion facility, for which there is an established market. The GLA will consider the points raised by the Applicant and will respond further in relation to this proposed amendment in full at Deadline 8A.
43. The Applicant confirmed acceptance of the GLA's proposed amendments to (3).

Requirement 26 - Combined heat and power

44. The Applicant accepted the GLA's amendments to the first sentence of (1), and an amended version of the GLA's proposed second sentence, stating "prior to the final commissioning", rather than "prior to the operation". The GLA agrees with the proposed amendment.
45. The Applicant proposed a new clause at (2) stating that prior to establishing the working group, the undertaker must submit the terms of reference for the working group, including the list of organisations attending that group, to LBB for approval. The GLA agrees with this in principle, but the GLA should be included explicitly within the working group, given the GLA's remit, experience and expertise in this area.
46. The Applicant proposed an addition, (d) to the terms of reference which would require the Applicant to identify the likely site connection point on site boundary as a result of the CHP review. The Applicant's position was that it could not commit to safeguarding the route now. The GLA considers that the exact nature of the route could be defined later but that a commitment to safeguarding the potential route should be required.
47. The GLA does not accept the Applicant's proposed amendment to the frequency of the CHP review from five to three years and maintains that that the CHP review should occur every two years. This is because the London housing market changes rapidly and, therefore, waiting three to five years for a CHP review will result in lost opportunities
48. The GLA also considers that space for the CHP plant and equipment should be recorded on a drawing, as the equipment will not be installed until after the REP is complete; this is necessary to ensure certainty regarding the delivery of the CHP and to ensure the space required for the plant is provided. It was noted that the Applicant has identified a notional area for the CHP on the Work Plans, so the GLA consider that this should be followed through in a Requirement for safeguarding. If space for the CHP plant and equipment is not safeguarded and is then used for other purposes, the costs associated with providing alternative space could render the district heating scheme uneconomic and preclude its development.

49. The GLA welcome the Applicant's confirmation that they would accept the deletion of 'without material costs'. The GLA agreed to the Applicant's proposals to include text to Requirement 2, stating that no works should commence in Work 1A until the heat export system equipment arrangement has been submitted and approved. GLA await the detailed wording to comment.

Requirement 27 - Use of compost material and gas from Work Number 1B

50. The Applicant accepted the GLA amendments to (1) and (2)(c).
51. The Applicant proposed to change the Anaerobic Digestion ('AD') review from every four years, to every two years. The GLA considers that this is still too long a period, and the review should be annual in order to limit the risk of the digestate material produced from the AD facility being burned in the ERF or sent to landfill.
52. The Applicant also proposed to include text that pauses the AD review if the AD process ceases for 2 years before the reviews resume. LBB does not consider such an amendment to be necessary. The GLA agrees.
53. The GLA's view is that its proposed amendment at (7) would be suitable and effective to replace (6), and that (8) and (9) are necessary to ensure that the outputs from the AD facility (digestate and biogas) will be used to maximise recycling and renewable energy benefits, and that the undertaker's position would be sufficiently protected. The Applicant accepted the GLA's amendment at (8), and at (9) with a further amendment to include the words 'electricity generation'.

Requirement 28 - Decommissioning

54. The GLA will provide comments as required once it has reviewed the relevant provisions of the proposed s106 agreement.

Requirement 33 – Waste Tonnage Cap (GLA's proposed Requirement)

55. The Applicant accepts the principle of a tonnage cap; however, there remains disagreement as to the cap figure. The Applicant's position, as set out at the Hearing, was that there is a need for the project, as it set out in its Project Benefits Report, and that the conditions on the RRRF permission do not represent a tonnage (UK) import cap. The basis of this submission was that, in the Applicant's view, a cap was only imposed on the amount of waste that can be transported from the Port of Tilbury.
56. The Applicant has maintained its position throughout the Examination that the ERF would help to meet a claimed 662,000 -900,000 tonnes per annum ERF capacity gap range for managing London's residual waste by 2036, as set out in its modelled scenarios in: 'The Project and Its Benefits Report, Document Ref. 7.2, Table 6.1, page 68. Paragraph 1.1.5 of the Benefits Report states '*REP will help meet London's pressing need for further waste management, resource recovery and energy generation infrastructure*'. The Applicant has also maintained that London has sufficient capacity at London's four riparian waste transfer stations to effectively service the ERF.

57. The GLA remains of the view that a cap on waste received from outside London is necessary and effective to ensure that the development remains a strategic facility to meet London's waste management needs, supports the sustainable transport of waste by river, and helps to support the achievement of the Mayor's 100% net waste self-sufficiency target by 2026 (London Plan Policy 5.17).
58. Requiring such a cap would be consistent with the planning conditions placed on the RRRF, whereby LBB, as instructed by the Secretary of State ('SoS'), granted planning permission to extend the waste processing capacity of the RRRF from 670,000 tonnes to 785,000 tonnes per annum. The SoS's RRRF Decision Letter appended at Appendix 2 sets out the SoS's considerations in granting the extension. Additional information is set out in the Approval Explanatory Memorandum appended at Appendix 3.
59. In granting the extension, the Secretary of State accepted the GLA's position that the GLA would support the extension, providing that a restriction was placed on waste received from outside London to satisfy concerns about London's strategic waste management needs being compromised in the absence of such a restriction. This is set out in paragraphs 17-19 of the SoS's Decision Letter. At paragraph 19, the SoS noted:

19. The Secretary of State agrees that the proposal to increase the throughput of waste is acceptable as it will help to optimise the utilisation of the Development. However, noting that the Development was originally consented on the basis that, except for 85,000 tonnes of waste per year, it should process only waste from Greater London or waste transported to it from riparian waste transfer stations in Greater London, the Secretary of State considers that limiting the amount of waste that can be received from the Port of Tilbury is reasonable in order to protect the position of London as a major supplier of waste to this Development. The Secretary of State has therefore decided to include a condition (new condition 5), as drafted by the Applicant, to address the GLA's concerns.

60. The planning permission, granted by LBB (reference: 16/02167/FUL), is appended at Appendix 4 and contains the conditions imposed on the RRRF and the reasons for those conditions. To assist the ExA, the relevant conditions and reasons relating to the restriction on waste delivered to the RRRF are set out below:

4 The total tonnage of waste received at the site shall not exceed 785,000 tonnes in any calendar year.

Reason: To ensure the development is operated generally in accordance with the environmental impact assessed in the supporting documents

5 The plant shall process only waste transported to it from a riparian waste transfer station in Greater London and the Port of Tilbury, other than the waste specified in condition 26 below.

Reason: To maximise the use of the river for transport of waste to the site.

6 No more than 115,000 tonnes of waste arising from outside Greater London shall be delivered to the plant from the Port of Tilbury in any calendar year.

Reason: To maximise the processing of waste produced within the Greater London area.

26 Except in the case of jetty outage:-

(a) not more than 195,000 tonnes of waste shall be delivered to the development by road in any calendar year; and

(b) no more than 85,000 tonnes of the waste transported to the development by road in any calendar year shall be transported from outside Greater London.

Reason: To limit the amount of traffic using the highway network in the vicinity of the site.

61. The effect of Condition 5 is that RRRF can process only waste transported to it by river from outside of London via the Port of Tilbury, subject to Condition 26. Condition 6 imposes a cap of 115,000 tonnes per annum on the amount of waste delivered to RRRF from the Port of Tilbury. Combining the limits set out in Condition 6 and Condition 26, the total amount of waste which is permitted to be transported to the RRRF from outside London is 200,000 tonnes per annum. This equates to 25 per cent of the total tonnage (785,000) that can be received per annum.
62. The GLA considers that the DCO requires similar waste import restrictions to help secure London's strategic waste management needs as has previously been accepted by the SoS. The GLA submits that Requirement 33 should be included within the DCO as set out below.

(1) The tonnage of waste delivered to work number 1A from the Port of Tilbury must not exceed 163,750 tonnes per annum, or exceed more than 25 per cent of the operational tonnage waste of the approved development, whichever is greater.

for further information, contact the GLA:

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Appendix 1 – CVs

Doug Simpson

Current role: Principal Policy and Programme Officer, Waste and Green Economy Team, GLA Environment Team. Leads on Waste and Circular Economy Policy

Qualifications: Bachelor's Degree in Resource and Environmental Planning (NZ)

Experience: 18 years environmental policy experience, predominantly for the GLA (since 2006), leading development of the London's waste and circularly economy policy programme. Experience at the GLA also includes modelling waste projections, using independent consultants to inform London's waste infrastructure need and informing the evidence base supporting the development and delivery of the Mayor's strategic statutory plans; the London Plan, London Environment Strategy, and Responsible Procurement Policy.

Stephen Inch

Current role: Senior Policy and Programme officer, Air Quality, GLA Environment Team

Qualifications: BSc (Joint Hons) Physics and Philosophy, MSc Environmental Diagnosis, Diploma of the Imperial College

Experience: 15 years' experience working in industrial air quality, environmental permitting and Local Authority Air Quality Management

Peter North

Current role: Director and Principal of Calorem Ltd.

Qualifications: BSc in Engineering, MSc in Building Services Engineering, Fellow of the Institution of Mechanical Engineers and a Chartered Engineer.

Experience: Professional career spanning almost 40 years within the energy sector for both private and public applications. Experience covers a broad range of energy technologies including power generation, energy from waste, combined heat and power and district heating based a range of energy sources from nuclear and fossil fuels to renewables.

Fred Raphael

Current Role: Principal Technical Planner, City Planning, Transport for London.

Qualifications: BA (Hons) Urban & Environmental Planning, MA Town Planning and MSc Transport Planning & Engineering.

Experience: 17 years' experience of transport planning practice at the local and strategic authorities in London and other geographies in the United Kingdom. Extensive experience of working on major development proposals and transport infrastructure, assessing impacts with appropriate methodologies and modelling techniques; and identifying, securing and delivering transport intervention packages to minimise adverse effects. Examples include the proposed Lower Thames Crossing.

The following are submitted as separate PDF documents:

Appendix 2 – SoS Riverside Resource Recovery Facility decision, dated 13 March 2015

Appendix 3 – DECC Approval Explanatory Memorandum

Appendix 4 - LBB Riverside Resource Recovery Facility decision notice, dated 4 October 2017