

EN010092 - Thurrock Flexible Generation Plant – Written Representation

On behalf of Thurrock District Scout Council, this is our written representation to the planning application and the potential impact to Condovers Scout Activity Centre, Church Road, East Tilbury. RM18 8QX

Background:

Condovers Scout Activity Centre (Condovers) is approximately 3.5 acres and is located on the south side of Church Road between Cooper Shaw Road and Low Street Lane. Condovers is used all year round by members of Thurrock Scouts, most of the activities at Condovers take place outdoors and all people staying at the site use tents as sleeping accommodation. Our peak use of the site is weekends (Easter to October), weekdays (late afternoon/evenings) May to August and full time during the school summer holidays (July/August).

Condovers Scout Activity Centre has been operating on this site since 1948 and has been detailed in the applicant's documentation as Havers Lodge, one of the buildings on the site. We understand from correspondence with the applicant, Condovers (including Havers Lodge) has been described as 'residential' in the Environmental Statement (ES) on a precautionary basis, under the technical guidance followed for assessing potential impacts from changes in air quality, noise, traffic, and other effects. Residential properties are considered as 'receptors' that are more sensitive to impacts than other categories that might have been applicable, such as considering the Activity Centre as a recreational or leisure facility where people are only present for shorter periods.

Condovers, named as Havers Lodge in the ES, is located 580 metres from the proposed development site (ES Project Description). The southern boundary is 100m to 200m from the proposed gas pipeline.

Condovers operational site:

As users of our site undertake almost all activities outdoors and use tents for sleeping accommodation it is not possible to mitigate against a reduction in air quality and noise pollution both during the construction phase and the operational phase.

Our main concerns with the proposals during the construction phase are:

1. The Environmental Statement has identified that additional HGV traffic on Church Road during construction (link 11), a very narrow country lane, going to the Zone C corridor for permanent access road, gas pipeline route and construction laydown. It is noted that the construction of the pipeline will take place over a few months, whereas the main development site could be anything up to 6 years. The Environmental Statement (3.4.22) leaves the option of using this route for bulk materials and plant for the main development site as well as the access road and gas pipeline.
2. The Environmental Statement also states that Zone C, the closest part of the development to Condovers, will have construction activity for the permanent access road and gas pipeline and in addition (para. 3.2.20) up to 2 hectares of Zone C, will also be used as a construction compound and materials laydown area. This will have additional impact on the noise levels and air quality at Condovers.
3. The applicants document 'Outline Construction Code of Practice' contains proposals for controlling noise levels and air quality during the construction phase. However, the Environmental Statement states that some of the construction techniques are still to be determined, for example piling could be either driven or vibratory (Environmental Statement

para 3.2.6). We consider that the documentation supplied by the applicant is too vague to ensure that adequate protection is provided for our property.

4. As well as the Environmental Statement considering the development as a standalone project the cumulative effect of other known developments have been considered by the applicant. The noise and vibration section of the Cumulative Effects Assessment Update (2.1.7) states

Link 11 (Coopers Shaw Road/Church Road/Station Road, between Gun Hill Road and EMR East Tilbury junction) where an impact at the lower threshold of moderate adverse is predicted. This route is intended to be used by Thurrock Flexible Generation Plant only in the exceptional circumstance that the primary access route via the Tilbury2 port is temporarily unavailable. It is understood that Link 11 is also not the primary access route for the Lower Thames Crossing (LTC) construction traffic, which will likewise use the route via Tilbury2 port. In the unlikely event that the Tilbury2 port route is unavailable to Thurrock Flexible Generation Plant traffic during a time which the construction of Thurrock Flexible Generation Plant and the LTC coincides, a moderate impact at medium sensitivity receptors could result in a temporary effect of moderate adverse significance.

Suggested mitigation during the construction phase:

- Schedule the pipeline and permanent access road construction works away from Condozers peak activity months of May to August.
- Minimise HGV traffic movements on Link 11 (Coopers Shaw Road / Church Road / Station Road, between Gun Hill Road and EMR East Tilbury junction) on Friday afternoons and Saturday mornings during Condozers peak activity months of May to August.
- If the Tilbury2 port route is unavailable to Thurrock Flexible Generation Plant traffic during a time which the construction of Thurrock Flexible Generation Plant and the LTC coincides, then construction traffic should be stopped, on this route, during Condozers peak activity months, May to August.
- Monitor the proposed normal construction working hours of Monday to Friday 08:00–18:00 and Saturday 08:00–13:00. No Sunday, bank holiday or night working and report any non-compliance.
- Appropriate mitigation measures should be undertaken for limiting dust during the construction phase.

Our main concerns with the proposals when operational are:

1. The operational Noise Assessment and Results (appendix 11.4) states:

During the night-time when the development is least likely to operate, the rating level is 11 dB above the background sound level at the most affected receptor, Havers Lodge. This is, initially, indicative of a moderate to major impact at this receptor, depending on the context. This will affect all those using tents as sleeping accommodation at the site as it is not possible as far as we are aware to provide noise mitigation for tents.

The issue of night-time noise has also been raised by Thurrock Council in their submission dated 18 August 2020 in which they state: There could be an escalation of noise during night-time hours which could result in interrupted sleep and it is not clearly defined how often this would occur.

Suggested mitigation:

- Referring to the Environmental Statement Appendix 11.4: Operational Noise Assessment Methodology and Results, Table 1 gives the typical operational hours between 23:00 and 07:00 as representing 2.4% of the total annual operational hours for the plant and 1.2% of the summer operational hours. We would ask that the Development Consent Order has a condition that the plant cannot be operated between the hours of 23:00 and 07:00 to prevent sleep disturbance to those using tents as sleeping accommodation on the site during our peak season of May to August.