Thurrock Flexible Energy Centre (EN010092)

Gravesham Borough Council

Deadline 3: Comments on Deadline 2 submissions

- 1. Below are brief comments on various aspects of the written representations and responses made to the ExQ1 questions submitted at deadline 2. In referencing document numbers the EN010092 has been omitted.
- 2. The Borough Council does not wish to appear at any of the hearings listed in the Rule 13 letter (001210) of 29 March 2021.
- 3. The council notes the approach to unaccompanied site visits and will supply any additional practical information if requested.
- 4. As noted in the para 5.8 of the Gravesham Borough Council response (001135) and the applicant's Statement of Commonality (001162) a statement of common ground is pending. Also relevant are the applicant's responses to ExQ1 questions 1.1.3, 1.1.4 and 1.5.7 to be found in their Applicants Responses to the First Written Questions (001166). The applicant's response to 1.1.2 and their additional supporting information on Hydrogen Combustion in Reciprocating Engines (001197) may also be relevant.
- 5. The Borough Council will make further detailed comments as necessary when those discussions have taken place. It remains very concerned about the impact on West Street and Harmer Street (on the one way system) as the proposal puts back the gains that have been made in improving air quality in the AQMA. It is noted that Public Health England Statement of Common Ground (001161) they state "we support approaches which minimise or mitigate public exposure to non-threshold air pollutants and address inequalities (in exposure) and encourage their consideration during site design, operational management, and regulation. While the relative change in concentration and exposure are minimal, PHE encourage ongoing efforts to reduce emissions to air wherever possible."
- 6. On the Green Belt the council's views are set out in its answer to 1.9.1 and does not proposed to add anything.
- 7. There are in the documents various references to the London Resort application, which was accepted by PINS for Examination at the end of January 2021. This proposes, inter alia, to use Tilbury Riverside (part of the Port of Tilbury) as a location for supply of construction materials, and then for car parking and a departure point for ferries to the resort. There is no reference to this in the revisions to the Environmental Statement Volume 5 Chapter 32: Summary of Cumulative Effects (001181).
- 8. In passing it may be noted that the Ecological Receptors Plan (001193) is now out of date as on 11 March 2021 Natural England¹ declared Swanscombe Peninsula SSSI, which is a large expansion and renaming of the existing Bakers Hole geological SSSI.

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¹ Detail can be <u>found here</u>

- 9. The Port of Tilbury in its Written Representations and responses to FWQ's (001140) in section 2 makes reference to how the causeway could be avoided by using access through its and RWE's site. The Borough Council would support this approach if it is feasible.
- 10. Shornemead Fort is discussed in the applicant's response (001166) to question 1.4.12. This is a non designated asset which forms part of a system of forts along both banks of the river to defend London and the port facilities. As the applicant says from that location as shown in Figure 3.21 Point 24 in A6 Vol 3 Chapter 6 Landscape and Visual Resources Part 3 (000745), the development does not significantly add to the visual clutter. As part of a wider system of forts there is a question over the cumulative impacts from the combination of developments on these historically significant assets.

12 April 2021