



Thurrock Power Ltd Comments on Thurrock District Scout Council Deadline 2 Submission

Deadline 3



1 THURORCK POWER LTD COMMENTS

1.1 Introduction

- 1.1.1 This document provides the applicant's comments on matters raised in the Thurrock District Scout Council's Written Representation at Deadline Two (REP2-079). Matters raised by the Scout Council are impacts of noise, air quality and traffic at the activity centre, which lies between the railway and Church Road, north of the proposed development site.

1.2 Summary comments

- 1.2.1 The assessments of transport, air quality, noise and vibration impacts as documented in the Environmental Statement have not predicted significant adverse effects during construction or operation at the activity centre.
- 1.2.2 With regard to construction impacts, mitigation and monitoring measures are provided through the Outline Code of Construction Practice and Outline Construction Traffic Management Plan. These documents are subject to approval in the detail by the planning authority prior to commencement of construction works, under requirements 5 and 6 in the draft DCO (REP2-014), and provide for adequate mitigation of impacts. Construction working hours and noise levels are already controlled under requirement 9.
- 1.2.3 The applicant does not accept that it is necessary, reasonable or proportionate to apply additional mitigation in the form of preventing construction activity and transport during a full third of the year as suggested by the Scout Council. This would severely hinder construction works and would prolong the duration of the construction programme with associated extended impacts on all receptors.
- 1.2.4 With regard to operational noise impacts and operating hours, requirement 16 in the draft DCO provides controls and monitoring of night-time noise levels and requirement 20 provides a limit on annual operating hours.
- 1.2.5 As set out in the ES Noise and Vibration chapter (APP-060) and in particular at paragraphs 2.2.13 to 2.2.16 in Appendix 11.4 (APP-099), at the activity centre (represented by the 'Havers Lodge' receptor) the change in ambient night-time noise level would be +3 dB if the proposed development's gas engines were operating. This is the minimum noise change usually perceptible to most people, and in the context of the existing night-time noise levels measured, would be very unlikely to cause any additional sleep disturbance.
- 1.2.6 The purpose of the proposed development is to provide vital electricity generation and storage that is flexible and can respond quickly to demand. As set out in the application, operation during the night-time would be rare and likely only for short durations as this is not a typical time of peak demand, but nevertheless the *availability* must be maintained to respond rapidly on occasion to changes in other intermittent generation sources and provide resilience to the grid.
- 1.2.7 Constraining this for a third of the year, as suggested by the Scout Council, would undermine the benefits of the proposed development and is not justified as mitigation for adverse effects.
- ## 1.3 Comment details
- 1.3.1 Further details of the comments on matters raised by the Scout Council are given in the table overleaf.

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Points raised	Response
<p>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.</p>	<p>Activity within the construction compound and materials laydown area proposed in Zone C is assessed in Appendix 11.3 Construction Noise Assessment Methodology and Results, under the category of “General activity within site compounds”. Predictions have shown that the predicted noise levels from the activity will be 55 dB(A), which is below the lower cut-off value during the day of 65 dB L_{Aeq}, as given in Method 2 within Annex E of BS 5228-1:2009+A1:2014.</p> <p>Table 2.20 of Chapter 12: Air Quality outlines the mitigation measures that will be implemented during the construction phase to keep the dust impact negligible. For the air quality impacts from construction traffic emissions, Appendix 12.6: Assessment of traffic related emissions shows that at the nearest modelled receptor to the Condovers Site (receptor 7 – Walnut Tree Farm), the construction traffic is predicted to increase air quality concentrations <0.05 µg.m⁻³ and the impacts are considered to be negligible.</p>
<p>The applicant’s 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.</p>	<p>The Environmental Statement has assessed maximum case impacts where details such as specific construction techniques are not confirmed at this stage of design. In the example of piling given by the Scout Council:</p> <p>Piling activity within Zone A is assessed in Appendix 11.3 Construction Noise Assessment Methodology and Results. As described in Table 1.5 of that appendix, the assessment used a source noise level associated with a hydraulic hammer rig, as defined in BS 5228-1:2009+A1:2014. This source level was chosen to be a representative worst case noise level as a result of piling activity, therefore if a vibratory piling rig is selected for the piling within Zone A, the noise level experienced at the receptor will be lower than that predicted. The noise associated with construction activity will be below the lower cut-off value during the day of 65 dB L_{Aeq}, as given in Method 2 within Annex E of BS 5228-1:2009+A1:2014.</p>
<p>Suggested mitigation during the construction phase:</p>	
<p>Schedule the pipeline and permanent access road construction works away from Condovers peak activity months of May to August.</p>	<p>As set out above, no significant adverse effects from these activities are predicted and preventing construction works for a substantial proportion of the year would not be reasonable or practical mitigation that is justified to mitigate an adverse effect.</p>
<p>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 Condovers peak activity months of May to August.</p>	<p>As set out in the application, Link 11 would only be used as a temporary option in the event of the route via Tilbury2 being temporarily unavailable. This already provides for minimisation (in fact avoidance, by design) of traffic on this route including on Friday afternoons and Saturday mornings during May to August.</p> <p>Details of construction traffic management will be provided through discharge of requirement 6 to the local planning authority and highway authority’s approval. This would include measures to minimise impacts on all receptors as far as possible. The applicant has noted that Friday afternoons and Saturday mornings from May to August are the more sensitive for Condovers and will consider that in production of the full Construction Traffic Management Plan in due course under requirement 6.</p>
<p>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 Condovers peak activity months, May to August.</p>	<p>Details of construction traffic management will be provided through discharge of requirement 6 to the local planning authority and highway authority’s approval. Complete closure of a fallback access route during the specific circumstance in which that route might be needed (i.e. temporary unavailability of the primary route via Tilbury2) would amount to preventing construction work from occurring. This is not a reasonable or practicable mitigation proposal. As set out in the Chapter 10 of the ES (APP-059), no significant effects from temporary construction traffic</p>

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	use of this road section (in the event of the main access via Tilbury2 and RWE sites being temporarily unavailable) are predicted.
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.	This is already secured by requirement 9 with respect to noise-generating works.
Appropriate mitigation measures should be undertaken for limiting dust during the construction phase.	This is agreed and will be provided through the CoCP, as already secured by requirement 5(2)(iv).
<p>1. The operational Noise Assessment and Results (appendix 11.4) states:</p> <p>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.</p>	<p>This statement is a mixture of text quoted from the ES and the Scout Council’s own comments. The ES text is as follows.</p> <p><i>“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.”</i></p> <p>It is important that, as is described in BS 4142:2014+A1:2019, the assessment of rating level difference is not considered in isolation, but rather in combination with the context of the sound. As Appendix 11.4 goes on to state, the receptor labelled as Havers Lodge is located in an area already exposed to high noise levels. Table 2.4 shows that the change in ambient noise level with the proposed development is +3 dB, which is the minimum noise change usually perceptible to most people. The night-time ambient noise level already exceeds the WHO guidance level for the onset of sleep disturbance and no additional sleep disturbance effect due to the proposed development is predicted.</p>
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.	<p>The proposed development is expected to operate only rarely during the night-time period (23:00-07:00) and if then, more likely towards the 07:00 time when power demand rises in the morning, but nevertheless the noise impact assessment has considered the maximum-case scenario of operation throughout a given night. As set out above, when considering the existing night-time ambient noise level and change (during any night when the proposed development were to operate), neither significant adverse effects nor sleep disturbance are predicted.</p> <p>The availability for flexible operation, including night-time operation when required, is essential to the purpose of the proposed development.</p>