

Thurrock Flexible Generation Plant Development Consent Order 2022 (“the DCO”) – Non-Material Change (“NMC”) Application – Written Response.

On behalf of Thurrock District Scout Council (TDSC), this is our written response to the NMC application on 14th February 2024 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 development site (ES Project Description). The southern boundary is 100m to 200m from the proposed gas pipeline.

When the Facility is fully operational:

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.

2. The DCO states:

Operational noise 16.—(1) Between 23.00 and 07.00 hours, noise arising from normal operation of the site may not exceed a rating level of 45 dB L_{Ar,Tr} at any residential property which is lawfully inhabited at the date of the making of this Order. (2) The level set out in sub-paragraph (1) is to be as measured in accordance with British Standard 4142:2014+A1:2019 (Methods for rating and assessing industrial and commercial sound) and British Standard 7445-3:1991 (Description and measurement of environmental noise. Guide to application to noise limits) or any standards replacing those.

This Non-Material Change Application:

“The currently consented DCO allows for an overall gross rated electrical output of gas reciprocating engines of up to 620MW, with this output being delivered by “up to 48” engines. The NMC would allow for an increase in the number of gas reciprocating engines that can be installed at the site from “up to 48” to “up to 100” while not affecting the overall output, which remains unchanged (i.e., 620MW). The change is being sought to enable flexibility in the size of engines procured in order to deliver the consented output limit”.

Questions:

- Is there any change in the noise levels by 48 engines and 100 engines when generating the consented overall gross rated electrical output of gas reciprocating engines of up to 620MW?
- If there is an increase in noise levels, will they be within the DCO consented noise levels?