The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Riverside Energy Park

Case Reference: EN010093

Adopted by the Planning Inspectorate (on behalf of the Secretary of State for Communities and Local Government) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

January 2018

[This page has been intentionally left blank]

CONTENTS

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

1. INTRODUCTION

1.1 Background

1.1.1 On 27 November 2017, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Cory Environmental Holdings Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Riverside Energy Park (the Proposed Development).

1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion "*as to the scope, and level of detail, of the information to be provided in the environmental statement'.*

1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled 'Riverside Energy Park Belvedere – EIA Scoping Report' (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.

1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.

1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:

(a) any information provided about the proposed development;

(b) the specific characteristics of the development;

(c) the likely significant effects of the development on the environment; and

(d) in the case of a subsequent application, the environmental statement submitted with the original application.

1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.

1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement

and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:

(a) a plan sufficient to identify the land;

(b) a description of the proposed development, including its location and technical capacity;

(c) an explanation of the likely significant effects of the development on the environment; and

(d) such other information or representations as the person making the request may wish to provide or make.

1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.

1.1.12 In accordance with Regulation 14(3)(a) where a scoping opinion has been issued in accordance with Regulation 10, an ES accompanying an application for an order granting development consent should be based on *"the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)"*.

1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017. This document must be coordinated with the EIA, to avoid duplication of information between assessments.

1.2 The Planning Inspectorate's Consultation

1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by

Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.

1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.

1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

1.3 Article 50 of the Treaty on European Union

1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity is provided in Chapters 2 of the Scoping Report.

2.2.2 The Proposed Development would comprise a waste Energy Recovery Facility (ERF), battery storage, a roof-mounted solar photovoltaic installation, an anaerobic digestion facility and provision for combined heat and power (CHP) readiness (collectively termed the Riverside Energy Park (REP)). It would require a new connection to the existing National Electrical Transmission System via a 132kv distribution network connection and a new substation; temporary laydown areas; temporary marine infrastructure (either a temporary causeway or a lift crane); and potentially dredging of the river bed.

2.2.3 The proposed application site is shown on Appendix A of the Scoping Report.

2.2.4 The REP would be located on 7ha of land located off Norman Road, Belvedere, London DA17 6JY and is immediately west of an existing ERF which is currently operated by the Applicant. It is irregular in shape and is predominantly used by the Applicant as an ancillary area for the existing Riverside Resource Recovery Facility (RRRF). The REP also includes an existing jetty in the River Thames which is currently used for delivery of waste and despatch of some by-products at the existing RRRF.

2.2.5 The Scoping Report currently identifies the following two underground route options for the electrical connection, which primarily follow existing road networks:

(i) Option 1 – connection at the existing National Grid substation on Renwick Road, Barking (this option will include access through an existing electricity cable tunnel under the River Thames); or

(ii) Option 2 – connection to the existing National Grid Littlebrook Power Station substation.

2.2.6 The route options are depicted in Appendix C of the Scoping Report.

2.2.7 The application site also includes two temporary laydown areas which would be sited: (i) on land to the immediate west of Norman Road; and (ii) on land to the south-east of the REP site and west of Crabtree Manorway North. These areas are shown on Appendix C of the Scoping Report. Both these temporary laydown areas are brownfield sites situated adjacent to existing industrial/commercial use buildings and are within 0.5km of the REP site.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

2.3.1 The description of the Proposed Development within the Scoping Report is relatively high level (at this stage) which does affect the level of detail possible in the Inspectorate's comments. The Inspectorate expects that at the point of application, the description of the Proposed Development will be sufficiently developed to include further details regarding the design, size and locations of the different elements of the Proposed Development. This should include the footprint and heights of both temporary and permanent structures and land-use requirements for all phases and elements of the Proposed Development. Where flexibility is sought the ES should clearly set out the maximum parameters that would apply.

2.3.2 Appendix C of the Scoping Report includes an Indicative Zoning Plan which identifies access, electrical connection options, temporary construction work areas, and the REP site. Whilst this approach is acceptable for the scoping process, the Inspectorate expects a more detailed plan depicting all land use within the REP site itself to be provided within the ES.

2.3.3 With this in mind, the Scoping Report indicates that there would be a 'main REP building' within which the ERF, the battery storage component, the anaerobic digestion facility (except the gas flares and bag) and the CHP infrastructure would all be located (with the solar photovoltaics installed on this building). The ES should detail the footprint and height of this building. Should flexibility be required, maximum parameters of the building should be detailed within the ES and taken into account in relevant assessments. A figure identifying the locations of individual elements within the main REP building would aid the readers understanding of the Proposed Development.

2.3.4 The dimensions of the solar photovoltaic provision across the roof should be identified within the ES.

2.3.5 The Inspectorate notes that the stack height will be determined through dispersion modelling. The ES should identify the location and dimensions of the stack. Should flexibility be required, any limits of deviation should be taken into account in the dispersion modelling and any other relevant assessments for example landscape and visual.

2.3.6 The Scoping Report also indicates that the application site extends around (but excludes) the existing resource recovery facility. The ES should detail the proposed use of land within these areas and identify whether there would be any interdependencies between the two facilities.

2.3.7 The Scoping Report states that the anaerobic digestion facility gas flares and bag would be located outside of the main REP building. The Inspectorate also assumes that the new substation would be located outside of the main REP building. The locations and dimensions of these elements should be identified within the ES.

2.3.8 The Applicant should describe any production process, including energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used. The likely significant effects associated with any particular technologies or substances proposed to be used should be described and assessed.

2.3.9 With the above comment in mind, the Scoping Report states that the solid digestate of the anaerobic digestion facility would either be used as fuel in the ERF or as a fertilizer in the agricultural sector. The Scoping Report does not explain what happens to the biogas product; this should be detailed within the ES and the implications on all technical assessments considered.

2.3.10 The Scoping Report identifies existing land use within the application site which includes container storage on concrete hardstanding, fencing, lighting, roads, compounds and car parking. Any requisite demolition that would take place as part of the Proposed Development should be described and assessed within the ES.

2.3.11 Paragraph 2.2.3 of the Scoping Report identifies the potential for dredging during the construction phase *"to ensure sufficient vessel access during the tidal cycle"*. The ES should delineate the areas that would be dredged and identify the likely quantities of material that would be dredged, along with the frequencies of these activities. The likely method of disposal for dredged material should be described and any resultant activities should be taken into account within the assessment (e.g. vessel movements).

2.3.12 The Scoping Report currently identifies two options for temporary works within the River Thames which would facilitate construction of the REP; (i) a causeway across the intertidal zone, or (ii) a lift crane on a jetty head constructed in the river or near the river bank. The ES should clearly described these works and provide details of the construction and use of any causeway or jetty.

2.3.13 The Proposed Development includes a battery storage component which would be integrated within the main building. The ES should confirm the output of the facility and detail how it will interact with the ERF.

2.3.14 The terms 'ERF building' and 'main REP building' appear to have been used interchangeably within the Scoping Report. In order to avoid the potential for confusion, the Applicant is advised to use consistent terminology when describing the elements of the Proposed Development within the ES.

Alternatives

2.3.15 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

2.3.16 The Inspectorate would expect to see a discrete section in the ES that provides details of the alternatives considered and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

2.3.17 The Applicant's attention is drawn to the Inspectorate's Advice Note 9 'Using the 'Rochdale Envelope'[1], which provides additional details on the recommended approach.

2.3.18 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different Proposed Development. The development parameters will need to be consistently and clearly defined in both the draft DCO (dDCO) and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.

2.3.19 It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the DCO application the Applicant may wish to consider requesting a new scoping opinion.

---

[1] Advice Note nine: Using the Rochdale Envelope. 2012. Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

3. EIA APPROACH

3.1 Introduction

3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note 7 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'[2] and associated appendices.

3.1.2 Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.

3.2.2 The relevant designated NPSs are:

- Overarching NPS for Energy (EN-1);

[2] Advice Note seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

- NPS for Renewable Energy Infrastructure (EN-3); and
- NPS for Electricity Networks Infrastructure (EN-5).

3.3 Scope of Assessment

General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- To demonstrate how the assessment has taken account of this Opinion;
- To identify and collate the residual effects after mitigation for each of the aspects, including the relevant interrelationships and cumulative effects;
- To set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
- To describe any remedial measures that are identified as being necessary following monitoring; and
- To identify where details are contained in the Habitats Regulations Assessment (HRA) report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

Baseline Scenario

3.3.2 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. The Inspectorate welcomes the Applicant's proposal to consider the future baseline within the ES, as detailed in section 6.2 of the Scoping Report.

Forecasting methods or evidence

3.3.3 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.

3.3.4 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. Any departure from that methodology should be described in individual aspect assessment chapters.

3.3.5 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

3.3.6 The Proposed Development is anticipated to have a nominal throughput of approximately 655,000 tonnes per annum (tpa); however the EIA will assess a maximum throughput of approximately 805,000tpa (paragraph 2.1.7 of the Scoping Report). The ES should explain why this is considered a relevant maximum throughput for the assessment and how this has been determined.

3.3.7 The Scoping Report states that any CHP infrastructure outside of the application site would not form part of the application for development consent. To the extent that it is possible, the ES should assess the likely significant cumulative effects of any such works in accordance with advice contained in the Inspectorate's Advice note seventeen: Cumulative effects assessment.

3.3.8 The Applicant is currently exploring two options for the temporary works within the River Thames; a temporary causeway or a lift crane. The Scoping Report does not state whether the DCO application will retain both options or opt for a single option. The ES should ensure that the significant effects associated with these options are assessed.

3.3.9 The Scoping Report confirms that a cumulative effects assessment will be presented within the ES. At this stage, no information is provided as to the plans or projects which will be included in the assessment; these should be agreed with the local authority. In this regard, the Inspectorate notes that Dartford Borough Council's response identifies a number of other proposed developments in the vicinity; the Inspectorate recommends that these are included within the cumulative effects assessment.

Residues and emissions

3.3.10 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

3.3.11 With regards to the residues and emissions described above, the Scoping Report has not considered the potential effects of heat. The Scoping Report does not describe the cooling processes for the Proposed Development, however the Inspectorate understands from a site visit on 1 December 2017 that air cooling would likely be utilised. On the basis that industry standard cooling would be in place (which does not result in any discharges to the River Thames), the Inspectorate is of the view that

significant effects are unlikely, however considers that this should be confirmed in the ES.

3.3.12 Radiation effects have not been addressed within the Scoping Report, however the Inspectorate is content that, given the nature of the Proposed Development, these do not need to be assessed for the Proposed Development.

Mitigation

3.3.13 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, ideally with reference to specific DCO requirements or other legally binding agreements.

Vulnerability of the development to risks of major accidents and/or disasters

3.3.14 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

3.3.15 The ES should also consider whether the Proposed Development itself has the potential to cause accidents or disasters during construction or operation and identify how these would be minimised. Any potential resultant likely significant environmental effects should be assessed within the ES along with the likely measures that will be employed to prevent and control such matters.

3.3.16 The Applicant has addressed this aspect within Section 8.2 of the Scoping Report. The Inspectorate's comments are provided within Table 4.12 of this Opinion.

Transboundary effects

3.3.17 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES.

3.3.18 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of

another EEA state, and where relevant, to consult with the EEA state affected.

3.3.19 The Scoping Report concludes that the Proposed Development is not likely to have significant impacts on another European Economic Area (EEA) State and proposes that transboundary effects do not need to be considered within the ES. The Inspectorate notes the Applicant's conclusion, however recommends that, for the avoidance of doubt, the ES details and justifies this conclusion.

A reference list

3.3.20 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Transport

(Scoping Report section 7.2)

Study area - The assessment area will be determined following Institute of Environmental Assessment (IEA) guidelines and will include:

- links with all vehicle or Heavy Vehicle traffic flow increases in any assessment year of +30%; and
- links with Medium or High sensitivity receptors with flow increases greater than 10%.

Methodology - The assessment would follow the 'Guidelines for the Environmental Assessment of Road Traffic' (1993) published by the Institute of Environmental Assessment (IEA), and where appropriate, Volume 11 of the 'Design Manual for Roads and Bridges' (DMRB).

Trip generation and distribution will be determined following Transport for London's online transport assessment guidance. Future year background traffic growth will be determined based on the Department for Transport's traffic forecasting tool TEMPro.

A worst-case assessment of operational traffic will be made assuming 100% of waste being delivered by road. The assessment will consider severance; driver delay; pedestrian delay and amenity; fear and intimidation; and accidents and road safety.

The ES chapter will be support by a Transport Assessment and a Navigational Risk Assessment.

Potential Impacts - The Scoping Report states that during construction and operation, the Proposed Development would generate road traffic movements on the local road network and vessel movements within the River Thames. Temporary changes to local access arrangements and the temporary closure of footways would be required during operation. During operation, there could be impacts on public transport resulting from additional staff trips.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.2.17	Dust and Dirt	The Applicant proposes to exclude the 'Dust and Dirt' criterion (from the IEA guidelines) from the Transport assessment as dust will be covered in the Air Quality chapter of the ES. The Inspectorate is content with this approach.
	Para	**Other points**	**Inspectorate's comments**
2	7.2.5	The electrical connection	The Scoping Report states that impacts from the electrical connection will be considered where appropriate. The Inspectorate considers that the ES should

			assess the impacts during construction of the electrical connection, particularly if any road closures are required.
3	7.2.6 & 7.2.8	Impacts of vessels	The Scoping Report has identified the potential for impacts on the level of service and level of safety for vessels on the River Thames during both construction and operation. No information has been provided as to how these impacts will be assessed, although it is noted that a Navigational Risk Assessment will be appended to the ES. The ES should set out the methodology used to undertake this assessment and to identify significant effects.
4	7.2.6 & 7.2.8	Users of Public Rights of Way (PRoW)	Any permanent closures/diversions of PRoWs should be identified within the ES for both the main REP site and the electrical connection. The potential effects of such closures/diversions should be assessed with appropriate cross referencing to other relevant aspect assessments such as those for noise, air quality and visual impacts.
5	7.2.6 & 7.2.8	England Coast Path	The Applicant's attention is drawn to the comments of Kent County Council regarding the proposed England Coast Path which is scheduled for completion by 2020. Any anticipated impacts to the national walking route should be assessed within the ES.
6	7.2.9	Assessment methodology	The Scoping Report explains that both IEA and DMRB guidance will be used to inform the assessment methodology for onshore transportation. It should be clear within the ES precisely how this guidance is utilised for the assessment.
7	7.2.10	Study area	The ES should confirm and justify whether the study areas for the construction and operational phase are the same. The study area for non-motorised users should also be identified and justified.
8	7.2.12 & 7.2.16	Trip generation and distribution	The ES should set out and justify the assumptions made in calculating trip generation and distribution data for both vehicle and river trips. The Inspectorate notes that although a modal split of at least 75% of waste being delivered by river is

			the ambition for the Proposed Development, the ES will assess a worst-case of 100% of waste being delivered by road in the operational phase. The Inspectorate considers this to be a sensible approach to the assessment. The Inspectorate also expects the ES to adopt a worst case scenario for the assessment of the construction phase.
9	2.1.12	Anaerobic digestion solid digestate	The Scoping Report states that solid digestate from the anaerobic digestion process would be used as a fuel within the ERF or would be transferred off-site for use in the agricultural sector as fertiliser. The Inspectorate notes that the solution for addressing the digestate could have implications on the transport assessment; a worst case scenario should therefore be described, justified and assessed in this regard.
10	n/a	Mitigation	The Scoping Report does not make reference to any mitigation for potential traffic impacts. The Applicant is advised to consider whether construction/operational traffic management plans would be appropriate. If such plans are relied upon to mitigate significant effects, the Inspectorate would expect draft versions of the plans to be provided with the application.
11	n/a	Cumulative effects	The response from Dartford Borough Council identifies ongoing improvements to A282 Junction 1A. These works should be taken into account within the cumulative effects assessment. Similarly, Kent County Council state that there is a significant amount of planned development within Dartford Borough Council administrative area. The Inspectorate recommends that the Applicant consults with both authorities to agree a list of projects and/or plans to be considered within the assessment.

4.2 Air Quality

(Scoping Report section 7.3)

Study area - For road traffic impacts, assessments will be undertaken where there is a modelled increase in traffic of more than 1,000 Annual Average Daily Traffic (AADT) on a road within 200m of ecological habitats.

The ES will assess impacts from combustion on designated ecological sites within 10km for Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites; and 2km for Sites of Special Scientific Interest (SSSIs), ancient woods, local wildlife sites and national and local nature reserves (LNRs).

Methodology - Atmospheric dispersion modelling will be used to predict combustion emissions; these will be compared to relevant objectives, rates and critical loads. An assessment of the risk to human health from potential emissions of persistent organic pollutants will be undertaken**.**

Air quality impacts from road and river traffic (during both construction and operation) will be assessed with reference to the Institute of Air Quality Management (IAQM) guidance and Environment Protection UK (EPUK): Land-use Planning & Development Control: Planning for Air Quality January (2017).

Dust will be assessed with reference to the IAQM's Guidance on the Assessment of Dust from Demolition and Construction (June 2016) and odour impacts will be qualitatively assessed in accordance with IAQM 'Guidance on the assessment of odour for planning' and Environment Agency guidance on Environmental Permitting.

Potential Impacts - The Scoping Report identifies the potential for the Proposed Development to generate nitrogen dioxide (NO_2), fine airborne particles (PM_{10} and $PM_{2.5}$), dust and odour from construction, road and river traffic, the receipt and processing of waste, and the combustion process. This could result in effects on residential receptors and designated ecological sites.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	n/a	n/a	The Applicant has not proposed to scope out any matters from this aspect.
	Para	**Other points**	**Inspectorate's comments**
2	7.3.4	Baseline conditions	The Scoping Report proposes to utilise data from local authority monitoring stations and roadside diffusion tubes to establish the environmental baseline. The Applicant is recommended to discuss with the relevant councils whether this information is sufficient or whether site specific surveys are necessary.
3	7.3.7	Air Quality Management Areas (AQMAs)	The London Borough of Bexley (LBB), the Royal Borough of Greenwich (RBG) and the London Borough of Barking and Dagenham (LBBD) are designated as AQMAs with

			respect to NO_2 and PM_{10}. If there is the potential for a significant effect on the AQMAs and their Action Plans, this should be assessed within the ES.
4	7.3.11	Baseline conditions	The Scoping Report states that operational facilities will be considered within the measurement of background concentrations, with the exception of the existing RRRF. The Scoping Report does not explain why the existing RRRF will not be included in the background concentrations. Given that the existing RRRF is operational, the Inspectorate considers that its emissions should be considered within the environmental baseline.
5	7.3.14	Emission scenario	The ES should explain and justify the 'conservative' emissions scenario to be used within the assessment.
6	7.3.20	Human health risk assessment	The Scoping Report does not propose a methodology for the human health risk assessment. The methodology should be clearly described within the ES.
7	n/a	Study area	The Scoping Report does not identify a study area for the assessment of combustion effects on human receptors or for the assessment of dust and odour effects. These should be identified and justified within the ES.

4.3 Noise and Vibration

(Scoping Report section 7.4)

Study area - The study area for noise impacts from the operation of the REP will be of an area within 1km of the REP site. The study area for noise impacts from traffic will depend on the outcome of the transport assessment.

Methodology - Baseline noise levels will be established through a noise survey to be undertaken at representative locations.

The construction noise and vibration assessment will be undertaken following guidance in BS 5228-1:2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites.

Operational noise from the REP will be assessed using methodology defined in BS 4142:2014 Methods for rating and assessing industrial and commercial sound.

Operational road traffic noise will be assessed using noise prediction procedures as detailed in the Department of Transport and Welsh Offices' 'The Calculation of Road Traffic Noise' (CRTN). A 3D acoustic model will be produced.

The significance of changes in noise levels will be based on guidance criteria contained in DMRB Volume 11 Section 3 Part 7 – HD213/11 Noise and Vibration.

Potential Impacts - The Scoping Report identifies the potential for noise and vibration impacts from fixed/mobile plant associated with the construction phase, construction traffic and the operational plant and traffic.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.4.6	Noise impacts associated with the electrical connection route	The Scoping Report states that noise impacts associated with the underground connection route are not considered significant and will not be assessed. The Inspectorate notes that both electrical route options would be constructed at locations in proximity to residential properties. In the absence of a justification for the conclusion of no likely significant effects, the Inspectorate does not consider that noise impacts during construction can be scoped out of the ES. The Inspectorate does however agree that noise impacts from the electrical connection during operation are not likely to be significant and can be scoped out of the ES.
2	n/a	Operational vibration	The Scoping Report makes no reference to the potential for impacts from vibration during the operational phase. For the avoidance of doubt and taking into account the nature and location of the Proposed Development, the Inspectorate is content

			to scope out operational vibration impacts from the REP.
	Para	**Other points**	**Inspectorate's comments**
3	7.4.2	Sensitive receptors	The noise and vibration chapter has only identified human sensitive noise receptors. The ES should also assess impacts from noise and vibration to ecological receptors (where relevant) and should appropriately cross refer to the assessment of impacts on biodiversity.
4	7.4.15	Vibration from heavy goods vehicles (HGVs)	It is unclear from the Scoping Report whether the Applicant intends to assess the impact of vibration from HGVs. The ES should assess any likely significant effects, based on the traffic model and known HGV movements.
5	7.4.12	Study area – operation	The Scoping Report does not clearly establish whether the study area for operational noise from the REP is from the boundary of the application site or to be taken from a centre point. The ES should clearly explain the approach to establishing the study area and the Applicant should ensure that it is sufficient to capture the extent of the likely impacts.
6	7.4.12	Study area - construction	The Scoping Report has not identified a study area for the assessment of noise and vibration from construction. The ES should clearly explain the approach to establishing the study area and the Applicant should ensure that it is sufficient to capture the extent of the likely impacts.

4.4 Townscape and Visual Impact Assessment

(Scoping Report section 7.5)

Study area - The study area has not been identified within the Scoping Report. However, a zone of theoretical visibility (ZTV) will be established to demonstrate a worst case scenario of the extent of the area from which the REP would be visible.

Methodology - The assessment will be based on professional experience and follow the Guidelines for Landscape and Visual Impact Assessment (GLVIA) (2013) , and Transport Analysis Guidance (WebTag) Chapter 7: Impact on Townscape (2015). The methodology will also be based on Landscape Institute Advice Note 01/11 Photography and Photomontage in Landscape and Visual Impact Assessment (2011).

The baseline will be established through a desk based study. A site visit will be undertaken to prepare a photographic record of the baseline year, from selected viewpoints.

The assessment will make comparison to a baseline year during both construction and operation.

For local views, the assessment will include a period 15 years after completion of the Proposed Development to take into account the establishment of mitigation.

Potential Impacts - The Scoping Report identifies potential effects on townscape features, townscape character, and people's view and visual amenity, during both the construction and operation of the Proposed Development.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.5.3	Electrical connection	The Scoping Report does not explicitly request to scope out the operational effects of the electrical connection. However, it states that as the electrical connection would be located underground, the potential significant townscape or visual effects would be mitigated. For the avoidance of doubt, the Inspectorate considers that significant effects during operation from the electrical connection are unlikely and an assessment of impacts for this matter can be scoped out of the ES.
	Para	**Other points**	**Inspectorate's comments**
2	7.5.7	Study area	The Scoping Report refers to 'the study area'; however this has not been defined. The study area should be sufficient to capture the extent of the likely impacts and should described and justified within the ES. The Inspectorate advises that the study area is agreed with relevant consultees.

3	7.5.8; Table 7.5.2	Viewpoints	The Scoping Report proposes representative viewpoints and states that the exact location of viewpoints may be refined or further scoped out if no views are identified. Where viewpoints are screened out, it would be useful for the ES to clarify that there would be no view. The Inspectorate also advises that the final list of representative viewpoints and photomontages should be agreed with the relevant planning authorities. The Inspectorate is unclear whether views affecting Crossness conservation area and associated listed buildings will form part of the assessment, and considers these viewpoints should be included. Such an assessment has also been requested by Historic England in their scoping consultation response.
4	7.5.13	Guidance	The Scoping Report states that Transport Analysis Guidance (WebTag) Chapter 7: Impact on Townscape (2015) has been used to inform the proposed assessment methodology. The Inspectorate notes that this guidance is an 'appraisal methodology' intended for the development of business cases, applicable to highways and public transport interventions and not necessarily for the purposes of undertaking EIA. The Applicant should take care to ensure that the methodology applied is sufficient to identify and assess the likely significant effects from the Proposed Development.
5	7.5.14	Mitigation	It is noted that the future year scenario will provide assessment of the residual townscape and visual effects, once any necessary mitigation has been established and settled. The assessment should take into account the potential uncertainties in the establishment of planting.
6	7.5.14; 7.5.16	Baseline year	The Scoping Report identifies both 2017 and 2018 as the baseline year in paragraphs 7.5.14 and 7.5.16 respectively. The baseline year that has been used for the assessment should be clarified within the ES.
7	7.5.15	ZTV	The ES should describe the model used, provide information on the area covered

			and the timing of any survey work and the methodology used to inform the ZTV.
8	7.5.16	Method	To support a robust impact assessment, the Proposed Development should be illustrated using plans and visualisations which highlight those features which would result in changes to landscape character and visual amenity. Cross sections and photomontages are likely to be useful for this purpose.
9	7.5.18	Conservation area	The Scoping Report notes various components of the urban environment that will be assessed within the ES. The Inspectorate also requires that the setting of the conservation area is included in the assessment as an urban environment component. The Applicant's attention is drawn to Historic England's scoping consultation response in this regard, with particular reference to the London Borough of Bexley's conservation area appraisal and management plan to help establish significance and sensitivities of assets.
10	7.5.26	Mitigation measures	The design and materials to be used in the construction of the Proposed Development should be given careful consideration to minimise the potential landscape and visual impacts.
11	7.5.31	Guidance	The Scoping Report states that the significance criteria has been developed with regard to GLVIA (2013). The Inspectorate considers that methodology for assessing the conservation area as a component of the townscape character should also be informed by Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, as requested by Historic England in their consultation response.

4.5 Historic Environment

(Scoping Report section 7.6)

Study area - The Scoping Report does not define the anticipated study area for this assessment.

Methodology - The assessment will incorporate results from an archaeology desk based assessment and a geo-archaeological statement.

The heritage baseline will be informed by the following sources:

- Greater London Historic Environment Record within 1km of the application boundary;
- designated assets obtained from Historic England;
- areas of importance identified by local planning policy; and
- cartographic and documentary research.

The determination of the importance of heritage assets will be based on statutory and non-statutory designations, the Secretary of State's non-statutory criteria and professional judgement. The significance of effects will be assessed relative to the sensitivity of the resource and the magnitude of impact.

Potential Impacts - The Scoping Report identifies potential impacts upon below ground non-designated archaeological remains during construction, and potential impacts on the setting of Crossness Conservation Area, including its associated three listed building, and the coaling jetty during operation.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.6.4	Setting of Crossness Conservation Area, associated listed buildings, Lesnes Abbey Scheduled Monument and of the coaling jetty during operation	The Scoping Report states that effects on these heritage assets are likely to be low or non-existent, given the nature of these designated remains, the nature of their setting, and the existing developments in the vicinity of the application site. It is unclear whether the Applicant is proposing to scope out an assessment of impacts to these assets from the ES. The Inspectorate does not consider that sufficient justification has been provided to justify there would be no likely significant effects. Therefore, the Inspectorate does not agree to scope out an assessment on these receptors from the ES. Historic England in their scoping consultation response, has also recommended an assessment that gives particular consideration to impacts on Crossness Conservation Area, associated listed buildings, and Lesnes Abbey Scheduled Monument.

2	7.6.5	Electrical connection effect on setting of heritage assets during operation	The Scoping Report states that during operation, the underground electricity connection would not affect the setting of heritage assets and therefore will not be assessed within the ES. The Inspectorate agrees significant effects during operation associated with the electrical connection are unlikely and agrees that this matter can be scoped out.
	Para	**Other points**	**Inspectorate's comments**
3	7.6.1; 7.6.7	Study area	The Scoping Report does not identify a study area for this aspect. The study area should be described and justified within the ES. The Inspectorate notes that a 1km search area surrounding the site has been applied to identify a number of heritage assets and archaeological remains. The ES should provide a robust justification of why the study area and 1km search area is appropriate and sufficient to capture all heritage assets which could experience impacts on their setting. To support this justification, the Applicant is advised to refer to the ZTV developed for the Townscape and Visual Impact Assessment.
4	7.6.7	Consultation	The ES should clearly state who has been consulted to inform the assessment. The Inspectorate advises that the local authority historic environment advisers and local studies library are consulted. This has also been requested by Historic England and Kent County Council in their responses.
5	7.6.8	Surveys	Previous geo-archaeological works and data used within the assessment should be clearly referenced within the ES. The Scoping Report does not propose any archaeological field surveys and evaluations, however the Inspectorate notes Historic England's consultation response which identifies the need for archaeological field surveys and evaluations, should they prove necessary. The Inspectorate recommends that the need (and if necessary, the scope) for such work is agreed with Historic England and

			Kent County Council.
6	7.6.9; Table 7.6.1; Table 7.6.2	Assessment methodology	The ES should clearly explain how the significance of effect has been determined. It should be clear how professional judgement has been applied.
7	7.6.9	Importance of heritage assets	The Scoping Report states that for non-designated archaeological assets, the Secretary of State's non-statutory criteria would be utilised. The Inspectorate is not clear what criteria this is referring to; this should be clarified within the ES. All guidance that has informed the assessment of effects should be identified within the ES and should be sufficient to identify and assess the likely significant effects from the Proposed Development.
8	7.6.13	Site Preparation	The Scoping Report states that archaeological resources are susceptible to a range of impacts during site preparation as well as construction related activities. The ES should clearly set out where the assessment of site preparation activities has been included within the assessment of the construction phase of the Proposed Development.
9	n/a	Marine archaeology	This chapter of the Scoping Report has focussed primarily on land-based archaeology. The ES should also assess the potential for effects to archaeology within the marine environment.

4.6 Terrestrial Biodiversity

(Scoping Report section 7.7)

Study area - The Scoping Report states that the study area will be variable dependent on the sensitivity of the ecological feature and the effects being considered.

The ES will assess impacts from combustion on designated ecological sites within 10km for SACs, SPAs and Ramsar sites; and 2km for SSSIs, ancient woods, local wildlife sites and national and local nature reserves.

Methodology - The baseline will be established through a desk study and site surveys. An extended Phase 1 habitat survey will be undertaken, which will inform the scope of any targeted habitat and species surveys. Wintering bird surveys are in progress.

The assessment will be undertaken in accordance with guidance from the Chartered Institute of Ecology and Ecological Management (CIEEM, 2016).

Potential Impacts - The Scoping Report identifies the potential for the following effects:

- habitat loss, disturbance (including through shading) or fragmentation during site clearance and/or construction;
- noise and/or visual disturbance during site clearance, construction or operation;
- dust during site clearance and/or construction;
- surface water drainage during construction or operation;
- lighting during construction or operation; and
- emissions/deposition during operation.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	n/a	n/a	The Applicant has not proposed to scope out any matters from this aspect.
	Para	**Other points**	**Inspectorate's comments**
2	Table 7.7.1	Surveys	The Scoping Report has identified the likely scope of ecology surveys. This has primarily focussed on the REP site. Although the electrical connection routes are primarily located in built-up areas, both route options appear to pass through undeveloped land. In addition, the southernmost temporary construction area is located close to the Crossness LNR and adjacent to fields. The Inspectorate expects full consideration to be given to the entire application site and to the mobility of species. It is recommended that the Applicant agrees its

			approach to survey work with Natural England and the local authority.
3	7.7.10	Designated sites	The Scoping Report states that in relation to effects from combustion plant emissions, designated ecological sites will be screened in based on the buffer zones of 10km for European sites and 2km for SSSIs. The Inspectorate recommends that relevant screening distances are discussed and agreed with the Environment Agency and should be based on the extent of likely impact.
4	7.7.21	Study area	The Inspectorate notes that the study area will be variable dependent on the sensitivity of the ecological feature and the effects being considered. The ES should clearly set out and justify the study areas applied to each receptor and effect.

4.7 Marine Biodiversity

(Scoping Report section 7.8)

Study area - The Scoping Report does not define the anticipated study area for this assessment.

Methodology - The baseline will be established through a desk study; a Phase 1 Intertidal Habitat Survey; and, if deemed necessary by relevant consultees, a benthic grab sampling study.

The assessment will be undertaken in accordance with guidance from the Chartered Institute of Ecology and Ecological Management (CIEEM, 2016) and relevant statutory guidance.

A logarithmic spreading model will be used to predict the propagation of sound pressure from piling. The physiological and behavioural effects of underwater noise on marine mammals will be assessed with reference to both published and unpublished criteria.

Potential Impacts - The Scoping Report identifies the potential for the following impacts from the construction and presence of marine infrastructure and potential dredging:

- benthic habitat loss and changes to the physical environment;
- temporary changes in water quality;
- underwater noise impacts; and
- non-native species transfer and introduction.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.8.4	Marine Conservation Zone assessment	The Scoping Report states that the application site overlaps with the Thames Estuary recommended Marine Conservation Zone (rMCZ), whose designation is currently on hold. Therefore, the Applicant considers a formal MCZ assessment is consequently not required at this point of time (MMO, 2013). The response from Natural England explains that the former Thames Estuary rMCZ has now been split into two separate sites (i) Upper Thames which stretches from Richmond Bridge to Battersea Bridge and (ii) Swanscombe which stretches from The Queen Elizabeth II Bridge to Columbia Wharf/ Grays respectively. The Upper Thames Estuary rMCZ is proposed as it is an important area for smelt. The Proposed Development is not situated within the boundary of either site, however smelt are

			a migratory species found along the whole of the tidal Thames and could be impacted by sediment plumes and under water noise. Natural England explains that these sites are not currently a material consideration, but the sites and features that are put forward to public consultation will become a material consideration at that stage. The Inspectorate considers that designation of the rMCZ is likely and therefore the ES should assess impacts on the rMCZ and its features.
2	Table 7.8.1	Benthic species and shellfish - noise disturbance	The are you Scoping Report states that crustacean sensitivity to underwater sound and vibration is very much lower than fish and that noise levels are unlikely to adversely impact the benthic community of shellfish. The Scoping Report has not provided existing and predicted noise levels or details of marine construction and noise generating activities. In the absence of detail of the marine construction works, the Inspectorate does not agree that this matter can be scoped out and recommends that the Applicant agrees the approach with the Marine Management Organisation.
3	Table 7.8.1	Fish and marine mammals - temporary habitat loss and change as a result of marine infrastructure	The Scoping Report states that the footprint of the proposed works and extent of indirect habitat change only covers a highly localised area that constitutes a very small fraction of the known ranges of local fish and marine mammal populations. However, the area of habitat loss and its importance to species has not been detailed within the Scoping Report. As such the Inspectorate does not agree to scope this out of the ES.
4	Table 7.8.1	Fish and marine mammals – noise disturbance from vessel movement	The Scoping Report states that vessel noise is unlikely to be discernible above ambient levels in the Thames Estuary. The Inspectorate agrees that significant effects are unlikely and that this can be scoped out of the ES.
5	Table 7.8.1	Fish – light disturbance	The Scoping Report states that the area of river that will be lit as a result of the new temporary infrastructure will only constitute a small fraction of the total width of the river and therefore no disruption or blocking of migratory routes are

			anticipated. No information on the importance of the affected area as a migratory route or the lux levels of lighting has been provided within the Scoping Report. In the absence of such information, the Inspectorate does not agree that this can be scoped out of the ES.
6	Table 7.8.1	Marine mammals – water quality	The Scoping Report states that the potential for accidental spillages will be negligible during all phases through following established industry guidance and protocols. The Scoping Report states that temporary and localised changes in water quality are unlikely to produce lethal and sub-lethal effects in these highly mobile species. The Inspectorate agrees that significant effects are unlikely and that this can be scoped out of the ES.
7	Table 7.8.1	Marine mammals – collision risk and visual disturbance	The Scoping Report asserts that marine mammals are expected to be habituated to high levels of disturbance and light stimuli. Furthermore, vessel movements in the vicinity of the proposed development (associated with the marine works) are mainly expected to be stationary or travelling at low speeds, making the risk of collision very low. The Inspectorate agrees that significant effects are unlikely and that this can be scoped out of the ES.
	Para	**Other points**	**Inspectorate's comments**
8	7.8.2 & 7.8.30	Study area	These paragraphs of the Scoping Report refer to 'the study area'; however this has not been defined. The ES should clearly explain the approach to establishing the study area and the Applicant should ensure that it is sufficient to capture the extent of the likely impacts.
9	7.8.17	Guidance	The Scoping Report refers to statutory guidance 'e.g. The Protection of Marine European Protected Species from Injury and Disturbance'. The Inspectorate notes that this guidance document is for Scottish inshore waters. The Applicant should take care to ensure any statutory guidance referred to is relevant and applicable.
10	7.8.18	Key data sources	The Marine Management Organisation's response highlights the Cefas spawning maps, the Cefas young fish survey and The

			Fish Atlas of the Celtic Sea, North Sea and Baltic Sea. The Inspectorate advises that these resources are used to help establish the baseline environment.
11	7.8.18-9	Fish and marine mammal surveys	No fish or marine mammal surveys are proposed. The Scoping Report proposes to utilise data from the London Zoological Society, Environment Agency, the National Biodiversity Network and previous impact assessments for nearby developments. The Inspectorate recommends that the Applicant agrees the level of necessary survey effort with relevant consultees including Natural England, the Environment Agency and the Marine Management Organisation.
12	7.8.22	Seabed restoration	The ES should detail how the seabed would be restored following the removal of marine infrastructure that is required for the construction phase. The aims of the restoration should be clear. The ES should provide details of any necessary pre- and post-construction coastal monitoring arrangements with any necessary defined triggers for intervention and restoration.
13	7.8.27	Logarithmic spreading model	The ES should identify the logarithmic spreading model and the piling parameters that have been utilised. A worst case assessment should be allowed for.
14	7.8.28	Unpublished criteria	Where unpublished criteria are relied upon within the assessment of underwater noise impacts, this should be fully justified.
15	n/a	Remobilisation of contaminated sediment	The Inspectorate agrees with the Marine Management Organisation that the potential remobilisation of contaminated sediment should be assessed within the ES.
16	n/a	Receptors	The Inspectorate notes from the Marine Management Organisation's response that the Thornback ray is an important species in the Thames estuary. This species has not been identified within the Scoping Report; the Inspectorate considers the potential impacts on this species should be assessed.
17	n/a	Inter-relationships	The assessment of impacts to marine mammals should consider inter-related impacts of a minor nature.

4.8 Marine Geomorphology

(Scoping Report section 7.9)

Study area - The Scoping Report does not define the anticipated study area for this assessment.

Methodology - The baseline will be established through available data sets from existing field surveys and any relevant previous available modelling results. No new bespoke numerical modelling is proposed. Bathymetry data will be requested from the Port of London Authority and a sediment contamination survey will be undertaken.

The assessment will utilise a source-pathway-receptor approach.

The Environment Agency's "Clearing the Waters for All" process will be used for the Water Framework Directive assessment of the Thames Estuary transitional water body.

Potential Impacts - The Scoping Report identifies the potential for direct morphological change and changes to the hydrodynamic regime, sediment transport processes, and water and sediment quality.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.9.17	Operational phase – impacts associated with temporary marine works	The Inspectorate understands that all temporary structures in the River Thames would be removed following completion of construction of the REP. On that basis, the Inspectorate agrees that significant effects during operation of the REP (i.e. following removal of the structures) are unlikely and can scoped out of the ES. However, for the avoidance of doubt, the Inspectorate would expect the effects of decommissioning of the temporary structures and reinstatement of habitats to be assessed. The Inspectorate does not therefore agree that the decommissioning of temporary structures can be scoped out.
2	Table 7.9.2	Changes to the wave climate	The Scoping Report states that the complex morphological shape of the Thames Estuary is likely to lead to dissipation of swell waves prior to entering the middle estuary containing the Proposed Development. Consequently, any wave activity at the site would be a result of local wind generation and will be small in magnitude. The Inspectorate considers that a jetty or causeway has the potential to generate a wave shadow and that the impacts of this on intertidal sediments, for example

			erosion or accretion around the structure, should be considered within the ES. As the Scoping Report does not provide details of the proposed structures in the River Thames, the Inspectorate does not agree that sufficient information is available to agree to scope out impacts from changes to wave climate.
3	Table 7.9.2	Changes in quality of bathing waters and shellfish water protected areas	The nearest bathing water (The Serpentine in Hyde Park) is located at a distance greater than 20km from the Proposed Development. The nearest shellfish water protected area (Southend shellfish water) is located greater than 30km from the application site. The distances of these areas from the Proposed Development are noted, however the Scoping Report has not demonstrated there is no pathway for effect (e.g. via the deposition of emissions), or that the concentrations of pollutants would not be at level to impact on these areas. Therefore the Inspectorate does not agree to scope out these matters.
	Para	**Other points**	**Inspectorate's comments**
4	7.9.9	Suspended sediment concentrations	The Inspectorate notes that the suspended sediment concentrations for the Thames Estuary are based on data collected in 2004. The Applicant should ensure that up-to-date information is utilised, or provide justification within the ES as to why data of this age is considered to be suitable and relevant.
5	7.9.21	Baseline environment	The Scoping Report proposes to utilise existing field surveys and modelling results. The ES should clearly identify the sources of the information used to inform the assessment.
6	7.9.21	Study area	This paragraph of the Scoping Report refers to 'the study area'; however this has not been defined. The study area should be described and justified within the ES.
7	7.9.23	Sediment contamination study	The Inspectorate recommends that the scope of the study is agreed with relevant consultees including the Environment Agency and the Marine Management Organisation.

8	7.9.28	Limitations	The Scoping Report states that where data availability limits the assessment, a judgement on significance of these limitations will be made. Any such judgements should be fully explained and reasoned within the ES.
9	n/a	Jetty design	The design of the proposed temporary marine works should be provided within the ES and used to inform the scope of hydrodynamic assessments.

4.9 Hydrology, Flood Risk and Water Resources

(Scoping Report section 7.10)

Study area - The Scoping Report does not define the anticipated study area for this assessment.

Methodology - The baseline will be established through a desk study, a walkover survey and consultation with the Environment Agency and local authorities. A qualitative approach including the use of professional judgement will be employed for the assessment.

The ES chapter will be supported by a Flood Risk Assessment (FRA). Subject to consultation with the EA, the Applicant proposes to undertake hydraulic modelling to define peak flood water levels.

An assessment of the effects of the Proposed Development on the environmental objectives of the Water Framework Directive will be undertaken in accordance with the framework of the Inspectorate's Advice note eighteen: The Water Framework Directive.

Potential Impacts - The Scoping Report identifies the potential for increases in impermeable surfaces and potential impacts on surface water and flood risk, and contamination of surface water during both construction and operation.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.10.11	Electrical connection – operational phase	The Scoping Report states that operation of the electrical connection will not give rise to impacts upon water resources, hydrology, flood risk or surface water drainage. The Inspectorate agrees that given the location and operational nature of the electrical connection, significant effects during operation are unlikely and this can be scoped out of the ES.
	Para	**Other points**	**Inspectorate's comments**
2	7.10.6	Water requirements	The Scoping Report states that water would be required for operational activities such as cooling of ash residues, however does not identify the source of this water. The source and quantity of all water required for the Proposed Development should be identified within the ES. If abstraction is necessary for either the construction or operational phase, the ES should provide the likely abstraction rates. Similarly, any discharges required for the Proposed Development should be detailed; the ES should identify the location of any discharge points and the quantity and

			composition of the discharge.
3	7.10.16	Surface water strategy	The Inspectorate welcomes that a surface water strategy will be devised. A draft version should be provided with the ES.
4	7.10.16	FRA – electrical connection	Paragraph 7.10.11 of the Scoping Report notes that the electrical connection construction activities have the potential to impact upon surface water drainage and water quality. No reference is made to the potential for flood risk from the construction of the electrical connection and the Scoping Report does not identify the flood risk/flood zone within the area of the electrical connection route. However, the Inspectorate notes from the EA flood maps that both options cross Flood Zone 3. The Applicant should consider the flood risk implications of the construction of the electrical connection within the ES.
5	7.10.17	Climate Change	The Inspectorate welcomes the consideration of climate change upon flood levels and surface water run-off. This should include the anticipated UKCP18 projections where appropriate.
6	7.11.9	Groundwater	The Ground Conditions chapter of the Scoping Report identifies the potential for impacts on groundwater quality; this has not been identified within the Hydrology, Flood Risk and Water Resources chapter. The ES should include appropriate cross-referencing between the two chapters.
7	n/a	Existing flood defences	The Scoping Report refers to a flood defence wall over which construction modules would be lifted. The ES should identify the locations of the flood defences and detail whether any works are required to them and, if so, the potential impacts from these works should be assessed. The ES should assess the potential impacts of the Proposed Development on the existing flood defences, in particular any effects resulting from changes to the hydrodynamic and sedimentary regime from the temporary marine infrastructure.
8	n/a	Study area	The Scoping Report does not identify a study area for this aspect. The study area should be described and justified within the

			ES.
9	n/a	Water quality and the Water Framework Directive	The assessment should take into account emissions to air from the Proposed Development and the potential implications of deposition on the quality of watercourses.

4.10 Ground Conditions

(Scoping Report section 7.11)

Study area - The Scoping Report does not define the anticipated study area for this assessment.

Methodology - The environmental baseline will be determined through the production of a Synopsis Phase 1 Ground Condition Assessment (GCA) undertaken in accordance with CLR 11 Model Procedures for the Management of Contaminated Land (EA, 2004), and the London Borough of Bexley Developers Guide (A Simplified Guide to Planning Applications and Land Contamination, January 2015)). This will comprise a desk based study; a site and area reconnaissance; a Tier 1 Qualitative Risk Assessment; a preliminary Conceptual Site Model (CSM); and a preliminary land stability assessment.

Potential effects will be considered separately for each identified pollutant linkage such that any potential impacts are identified and mitigated as required.

The need for additional intrusive ground investigation will be determined by the GCA.

The assessment of significant will follow the IEMA Guidelines for Environmental Impact Assessment (2004).

Potential Impacts - The Scoping Report identifies the following potential impacts:

- mobilisation of potential contamination and creation of pathways during construction;
- exposure of construction workers to potential contamination;
- chemical attack and decay of buried concrete structures;
- permeation of water supply pipes by potential contaminants and damage to structures by explosion due to ground gases; and
- introduction of new potential contaminants to the environment.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.11.14	Electrical connection	The Scoping Report explains that the electrical connections would follow existing highways or corridors utilised by the existing RRRF connection if possible; this would avoid excavations outside the existing highway footprint or make-up and therefore impacts are unlikely to be significant. The Scoping Report does not explicitly request to scope out the assessment of impacts from the electrical connection. However, for the avoidance of doubt, the Inspectorate is content that these works are unlikely to result in significant effects

			and for this matter to be scoped out of the ES.
	Para	**Other points**	**Inspectorate's comments**
2	7.11.13	Mitigation/ remediation options	All proposed mitigation and/or necessary remediation should be described within the ES.
3	7.11.19	Assessing significance	The method for assessing the significance of potential effects has not been identified within the Scoping Report. This should be included within the ES.
4	7.7.6	Abbey Wood SSSI	The Terrestrial Ecology chapter of the Scoping Report identifies Abbey Wood SSSI as a geological designation, however this site is not considered within the Ground Conditions chapter of the Scoping Report. The potential for effects on this designation should be assessed within the ES.
5	n/a	Study area	The Scoping Report does not identify a study area for this aspect. The study area should have regard to the potential for the mobilisation of contaminants and should be described and justified within the ES.

4.11 Socio-economics

(Scoping Report section 7.12)

Study area - The assessment will include a socio-economic profile of local, wider and regional areas based on drive time catchment areas of 30 minutes, 45 minutes and 60 minutes

Methodology - The baseline and socio-economic context will be established by review of relevant economic, policy, and strategy documents and data collection from the study area.

The assessment will be based on HM Treasury Green Book Appraisal guidance.

The Chambers of Commerce and London Economic Action Partnership are proposed to be consulted regarding the assessment methodology.

Potential Impacts - The Scoping Report considers the potential effects from construction and operation on:

- gross and net additional employment;
- supply chain impacts; and
- gross value added impacts.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.12.3	Community	The Scoping Report states that the construction and operation of the Proposed Development are unlikely to lead to an increase in migration, and as a result is unlikely to create an additional demand on housing and other local community infrastructure facilities. As the Scoping Report has scoped in the potential effect on gross and net additional employment, the Inspectorate considers that there is potential for an increase in migration during construction and operation, and sufficient evidence has not been provided to scope out the assessment on housing and community infrastructure.
2	7.12.4-7	Tourism and recreation	The Scoping Report states that the transport chapter of the ES will assess impacts on pedestrian and cycle networks. The Inspectorate notes that that the Townscape and Visual Impact Assessment will assess the visual amenity from a number of recreational facilities including Public Rights of Way, Crossness Nature Reserve, and National Cycle Network Route. Therefore, the Inspectorate agrees that the

			effects of tourism and recreations will be sufficiently addressed in other chapters of the ES, and does not need to be specifically assessed in the socio-economic chapter.
	Para	**Other points**	**Inspectorate's comments**
3	7.12.9	Labour Market	The ES should set out the sources of the socio-economic data collected as part of the assessment.
4	7.12.11	Potential environmental effects	The Inspectorate advises that the types of jobs generated by the Proposed Development should be considered in the context of the available workforce in the area and advises that this applies equally to the construction and operational stages.
5	7.12.12	Method	The Inspectorate notes that the HM Treasury Green Book, is guidance for central government. The Applicant should take care to ensure that the methodology applied is sufficient to identify and assess the likely significant effects from the Proposed Development.
6	n/a	Significance criteria	The methodology for assessing the significance of potential effects has not been identified within the Scoping Report; this should be clearly explained within the ES.

4.12 Risks of Major Accidents and/or Disasters

(Scoping Report section 8.2)

The Scoping Report states that the key environmental risks will be described within chapter 3 of the ES (the Proposed Development). Aspect chapters within the ES will consider foreseeable risks during the construction period, from accidents such as fuel spillages and identify how the risk of such events will be minimised. The Environmental Permit is anticipated to deal with the majority of emergency response plans and contingency measures.			
ID	**Para**	**Applicant's proposed matters to scope out**	**Inspectorate's comments**
1	8.2.6	Effects to the environment resulting from accidents or disasters	The Applicant considers that sufficient controls would be in place to ensure any effects to the environment resulting from accidents or disasters would be reduced to a level that is not significant and has therefore proposed to scope out this out of the ES. The Inspectorate notes the proposal in paragraph 8.2.3 to consider foreseeable risks in other aspect chapters. The Inspectorate therefore agrees that a separate standalone assessment is not required.

4.13 Climate

(Scoping Report section 8.3)

Table 1.1 of Appendix H of the Scoping Report confirms that the impacts of climate change on the Proposed Development (i.e. changing weather scenarios) will be considered within the following technical chapters of the ES:

- Terrestrial Biodiversity;
- Hydrology, Flood Risk and Water Resources; and
- Health.

The ES will not consider impacts of the Proposed Development on climate change.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	8.3.1	Contribution to greenhouse gasses and the effects on climate	Appendix H of the Scoping Report explains that a carbon emissions assessment for the existing Riverside Resource Recovery Facility showed that the energy from waste plant provides a carbon saving of 212kg CO_2 per tonne of waste when compared to disposal via landfill. The Scoping Report states that report was reviewed and ratified by the Carbon Trust. The Applicant therefore concludes that there would be no significant increases in emissions compared to an alternative of landfilling for the Proposed Development. The Inspectorate understands that there are no viable alternatives to the treatment of the waste proposed to be handled by the Proposed Development. On this basis, the Inspectorate considers that significant effects are not likely and agrees that this can be scoped out of the ES. The Inspectorate notes that a qualitative assessment of greenhouse gas emissions will be submitted as an appendix to the Design and Access Statement. As relevant, this should be included within the ES.
2	8.3.1	Impact of climate change on the Proposed Development	Table 1.1 of Appendix H of the Scoping Report scopes out changing weather scenarios from all technical chapters of the ES except: • Terrestrial Biodiversity; • Hydrology, Flood Risk and Water Resources; and • Health.

			The Inspectorate agrees with the justifications provided in Table 1.1 to scope out climate change from the other technical chapters and is content with the Applicant's proposed approach.
	Para	**Other points**	**Inspectorate's comments**
3	8.3.1	Climate projections	The Inspectorate welcomes the proposal to consider climate change projections in relevant aspect chapters. This should include the anticipated UKCP18 projections where appropriate.

4.14 Aviation

(Scoping Report section 8.4)

The Scoping Report proposes to scope out the potential impacts on aviation.			
ID	**Para**	**Applicant's proposed matters to scope out**	**Inspectorate's comments**
1	8.4.1-5	Aviation	The Scoping Report states that sufficient mitigation exists, in the form of consultation with safeguarded airfields and stakeholders appropriate aviation lighting and highlighting developments on aviation mapping. In addition, the Applicant considers that there is the precedent for existing comparable structures already set in the immediate locality of the application site. The Scoping Report states that it is not a requirement under the EIA Regulations to undertake an assessment of likely impacts to aviation and explains that a standalone statement in relation to aviation will be provided with the application. Although the height of the flue stack has not been determined at this stage, the Inspectorate considers it unlikely that an energy from waste plant in this location would have a significant effect on aviation and therefore agrees to scope this out of the ES.

4.15 Daylight and Sunlight

(Scoping Report section 8.5)

The Scoping Report proposes to scope out the potential impacts on daylight and sunlight.			
ID	**Para**	**Applicant's proposed matters to scope out**	**Inspectorate's comments**
1	8.5.1	Daylight and sunlight	The Scoping Report identifies the closest residential receptors as being located approximately 800m to the south at the Travelodge London Belvedere, Hackney House and properties along Norman Road (south), North Road and Poppy Close. The Inspectorate agrees that, given the distance, the Proposed Development would not result in the significant loss of daylight or sunlight at the closest residential receptors and that this can be scoped out of the EIA.

4.16 Environmental Wind

(Scoping Report section 8.6)

The Scoping Report proposes to scope out the potential impacts of changes to environmental wind.			
ID	**Para**	**Applicant's proposed matters to scope out**	**Inspectorate's comments**
1	8.6.1-4	The effects on pedestrian comfort and safety as a result of any changes to the local micro climate	The Scoping Report identifies relevant receptors as users of the adjacent Thames Path to the north of the site and users of the network of PRoWs adjacent to the site. The Applicant notes that receptors are not anticipated to be sitting or standing in the vicinity of REP and are therefore less sensitive to higher wind speeds. In addition, users of the Thames Path and PRoWs are already exposed to potentially windy conditions including strong gusts given the open context of the environment along the river. The Inspectorate agrees that the Proposed Development is unlikely to result in significant effects to the environment in terms of environmental wind and it can therefore be scoped out of the EIA.

4.17 Lighting

(Scoping Report section 8.7)

The Scoping Report proposes to scope out an assessment of the impacts of lighting on human receptors. Impacts from lighting on ecological receptors will be assessed within the Terrestrial Biodiversity and Marine Biodiversity chapters.			
ID	**Para**	**Applicant's proposed matters to scope out**	**Inspectorate's comments**
1	8.7.1-7	Lighting effects on human receptors	The Scoping Report notes that the Proposed Development is located within an existing dense urban environment which is subject to levels of existing activity, movement and lighting in dark hours/night. It states that the Proposed Development is not anticipated to introduce lighting effects which would result in a significant change to the existing conditions during either the construction or operational phases and that the closest residential area is situated approximately 800m to the south of the application site. The Inspectorate agrees that impacts from construction and operation on human receptors can be scoped out of the ES. The Scoping Report acknowledges that the construction of the electrical connection may introduce temporary lighting effects within residential areas. However, it states that the timing of works would be limited and agreed by way of DCO Requirement, therefore preventing the opportunity for significant lighting effects. The Inspectorate agrees that effects on human receptors from lighting during the construction phase of the electrical connection would be short lived and are unlikely to be significant; as such this can be scoped out of the ES. For the avoidance of doubt, the Inspectorate expects the potential effects on lighting on terrestrial ecological receptors to be assessed within the ES, as proposed in paragraph 7.7.19 of the Scoping Report. The Inspectorate's comments on effects of lighting on marine ecological receptors are provided in section 4.7 of this Scoping Opinion.

4.18 Human Health

(Scoping Report section 8.8)

The Scoping Report confirms that human health will be considered within the Air Quality chapter and in a Health Impact Assessment (HIA) which will be appended to the ES. The ES will signpost to the HIA within an 'Other Considerations' chapter. The HIA will consider 'health and wellbeing objectives' as set out in the Healthy Urban Planning Checklist from London's Healthy Urban Development Unit.			
ID	**Para**	**Applicant's proposed matters to scope out**	**Inspectorate's comments**
1	8.8.1	Health	As noted above, the Applicant intends to assess impacts to human health within the ES. On the basis that human health is addressed within relevant chapters of the ES, the Inspectorate agrees that a separate assessment is not required. The Inspectorate considers that impacts to human health from noise and vibration should also be considered.
2	Appendix G Table 1	Health and wellbeing objectives	The Applicant proposes to scope out the following 'health and wellbeing objectives' from the HIA: • housing design and accessible housing; • housing mix and affordability; • play space/local food growing; • healthcare service; • access to local food shops; and • public buildings and spaces. No justification has been provided within the table; however, given the nature and scale of the Proposed Development, the Inspectorate does not consider that significant effects to health and well-being from these matters is likely and therefore agrees that these can be scoped out.
3	Appendix G Para 4.5	Vulnerable groups – individuals with disabilities	The Scoping Report states that the Proposed Development is not anticipated to have a disproportionate impact on individuals with disabilities. The Inspectorate considers that in the absence of information on vulnerable groups in the

			locality, it is premature to scope out this matter at this stage.
	Para	**Other points**	**Inspectorate's comments**
4	Appendix G Para 4.2	Assessment methodology	The Scoping Report states that it is not considered appropriate to develop significance criteria for human health within the ES due to the multidisciplinary nature of HIA. Effects will be categorised solely into significant and not significant effects. The Inspectorate is content with this approach but emphasises the need for thorough and clear justifications for the conclusions that are presented within the ES.
5	n/a	Electric and magnetic fields (EMF)	The ES should assess impacts to human receptors from exposure to EMF associated with the Proposed Development where these impacts may result in significant environmental effects.

4.19 Waste

(Scoping Report section 8.9)

The Scoping Report states that construction would seek to comply with the GLA's target of recycling/reusing 95% of construction, excavation and demolition waste.

The Scoping Report explains that waste generated during the operational phase would consist of:

- incinerator bottom ash (IBA) – to be transported by river to the Port of Tilbury for treatment and onwards sale;
- air pollution control residues (APCR) – to be removed by road; and
- general waste e.g. air filters, scrap metal, insulation material, oils, chemicals and office waste.

The Applicant proposes to provide a Waste Management Strategy with the application which will set the construction and operational waste management principles for the development, identifying the waste expected to arise and the proposed routes for managing those arisings.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	8.9.2-4	Construction phase waste	The Scoping Report states that works for the preparation and clearance of the REP site will include top soil stripping along with the clearance of vegetation. It concludes that waste generated during the site preparation and clearance phase would be *de minimis.* However, this appears to be contradicted by paragraph 8.9.3 which states that *"It is considered likely that there would be surplus material generated, in the form of spoil and made ground."* The Scoping Report also identifies the potential for off-cuts from construction materials. The Inspectorate acknowledges that the construction of infrastructure projects is inevitably going to generate waste. The consequential effects from handling the waste should be addressed within relevant aspect chapters of the ES (e.g. transport).
2	8.9.5-8.9.9	Operational phase waste	The Inspectorate considers that operational 'general waste' (in the form of air filters, scrap metal, insulation material, oils and chemical and office waste) are unlikely to result in significant environmental effects and agrees that this can be scoped out of the ES. With regard to the digestate, IBA and APCR, the Inspectorate expects that the

			resultant road and vessel movements would be factored into the transport assessment and other related aspects (e.g. air quality and noise).

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus[3]
- Planning Inspectorate advice notes[4]:
  - Advice Note Three: EIA Consultation and Notification;
  - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
  - Advice Note Five: Section 53 Rights of Entry (Planning Act 2008);
  - Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping;
  - Advice Note Nine: Using the 'Rochdale Envelope';
  - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
  - Advice Note Twelve: Transboundary Impacts
  - Advice Note Seventeen: Cumulative Effects Assessment; and
  - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

[3] The Planning Inspectorate's pre-application services for applicants. Available from: https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/

[4] The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[5]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Barking and Dagenham Clinical Commissioning Group
	Greenwich Clinical Commissioning Group
	Bexley Clinical Commissioning Group
	Dartford, Gravesham and Swanley Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - Greater London; South East
The relevant fire and rescue authority	London Fire Brigade
	Kent Fire and Rescue Service
The relevant police and crime commissioner	Mayor's Office for Policing and Crime
	Kent Police and Crime Commissioner
The Environment Agency	The Environment Agency - Kent, South London and East Sussex; Hertfordshire & North London
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency – Regional Office	The Maritime and Coastguard Agency - London
The Marine Management Organisation	Marine Management Organisation (MMO)
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Kent County Council

[5] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	London Borough of Havering
	London Borough of Barking and Dagenham
	Royal Borough of Greenwich
	London Borough of Bexley
The relevant strategic highways company	Highways England - South East
Transport for London	Transport for London
Trinity House	Trinity House
Public Health England, an executive agency of the Department of Health	Public Health England
Relevant statutory undertakers	See Table 2 below
The Crown Estate Commissioners	The Crown Estate
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[6]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	Barking and Dagenham Clinical Commissioning Group
	Greenwich Clinical Commissioning Group
	Bexley Clinical Commissioning Group
	Dartford, Gravesham and Swanley Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	London Ambulance Service NHS Trust
The relevant NHS Foundation Trust	South East Coast Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd

[6] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

STATUTORY UNDERTAKER	ORGANISATION
Railways	Highways England Historical Railways Estate
Road Transport	Transport for London
Dock and Harbour authority	Port of London Authority
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	Environment Agency - Kent, South London and East Sussex; Hertfordshire & North London
The relevant water and sewage undertaker	Essex and Suffolk Water
	Southern Water
	Thames Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity generator with CPO Powers	RWE Generation UK Plc (Littlebrook Power Station)

STATUTORY UNDERTAKER	ORGANISATION
	Energetics Electricity Limited
	Energy Assets Power Networks
	ESP Electricity Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Utility Distribution Networks Limited
	Southern Electric Power Distribution Plc
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))[7]

LOCAL AUTHORITY[8]
London Borough of Havering
London Borough Barking and Dagenham
Royal Borough of Greenwich Council
London Borough of Bexley
Dartford Borough Council
Thurrock Council
Gravesham Borough Council

[7] Sections 43 and 42(B) of the PA2008

[8] As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY[8]
Sevenoaks District Council
Epping Forest District Council
Brentwood Borough Council
London Borough of Redbridge
Tower Hamlets Council
London Borough of Bromley
London Borough of Newham
London Borough of Lewisham
Kent County Council
Essex County Council
Medway Council
Surrey Council
East Sussex County Council

THE GREATER LONDON AUTHORITY

The Greater London Authority (GLA) have also been identified as a consultation body under the EIA Regulations because the proposed application is within Greater London.

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Royal National Lifeboat Institution

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Civil Aviation Authority
Dartford Borough Council
ESP Gas Group Ltd
Health and Safety Executive
Highways England
Historic England
Kent County Council
London Borough of Bexley
London Borough of Havering
London Fire and Emergency Planning Authority
Marine Management Organisation
Maritime and Coastguard Agency
Medway Council
Ministry of Defence
National Grid
NATS (En Route) Public Limited Company
Natural England
Port of London Authority
Public Health England
Royal Borough of Greenwich
Royal Mail
SGN
Southern Water
Surrey County Council
The Crown Estate
Trinity House
Wales and West Utilities

From:	Jiggins Craig
To:	Riverside Energy Park
Subject:	Riverside Energy Park - EN010093-000004 (Attention of Hannah Pratt)
Date:	18 December 2017 14:54:57
Attachments:	CAP168Ed10Feb2014-Extract-LightingofObstacles.pdf CAP393Ed5-ANO2016ExtractsLightingArticles.pdf

Dear Hannah

I have looked at the EIA Scoping notification and consultation document on the website and the main area that may be of concern is the height of the flue stack, which at this time has not been indicated here. Because of that, all I can do is provide some guidance which may/may not be required once the height of the stack has been determined.

Aviation Warning Lighting

In the UK, the need for aviation obstruction lighting on 'tall' structures depends in the first instance upon any particular structure's location in relationship to an aerodrome. If the structure constitutes an 'aerodrome obstruction' it is the aerodrome operator that with review the lighting requirement (part of the safeguarding process). For civil aerodromes, they will, in general terms, follow the requirements of CAP 168 - Licensing of Aerodromes. This document can be downloaded from the Civil Aviation CAA website at http://publicapps.caa.co.uk/docs/33/CAP168LicensingofAerodromes.pdf - Chapter 4 refers to obstacles and obstacle lighting (I have included an extract from CAP168).

Away from aerodromes Article 222 of the UK Air Navigation Order applies (CAP 393 published on our website at: http://publicapps.caa.co.uk/docs/33/CAP393Ed5Am1_OCT2016.pdf – to get there quickly, open the document and search for 'Lights and Lighting'. Article 222 requires that for en-route obstructions (ie away from aerodromes) lighting only becomes legally mandated for structures of a height of 150m or more above ground level.

Typically, structures less than 150m above ground level and away from the immediate vicinity of an aerodrome are not routinely lit for civil aviation purposes. However, structures of lesser high might need aviation obstruction lighting if, by virtue of their location and nature, they are considered a significant navigational hazard.

Note that if the structure is to be 150m or higher, the lighting specification set out in Article 222 becomes a statutory requirement. In this latter case, any proposal to seek a lighting specification at odds with Article 222 should involve the CAA at the earliest convenience (0207 453 6559 / craig.jiggins@caa.co.uk).

Crane Operations
Cranes, whether in situ temporarily or long term are captured by the points heighted above. Note that if a crane is located on top of another structure, it is the overall hgt (structure + crane) than is relevant. Temporary structures such as cranes can be notified through the means of a Notice to Airmen (NOTAM). If above a hgt of 300ft (91.4m) above ground level, the developer must ensure that the crane operator contacts the CAA's Airspace Regulation (AR) section on ARops@caa.co.uk or 02074536599.

For cranes below this hgt the developer must ensure that the crane operator contacts Low Flying Operations at RAF Wittering CAS-ASLFOSOpsLF@mod.uk / 01780 146 208. However, in this case that is not necessary as no military low-flying routinely takes place in this location.

If the crane is to be in place for in excess of 90 days it should be considered a permanent structure and will need to be notified as such: to that end the developer should also contact the DGC (see above). Additionally, any crane of a hgt of 60m or more will need to be equipped with aviation warning lighting in line with CAA guidance concerning crane operations which is again available at http://publicapps.caa.co.uk/docs/33/CAP%201096%20In%20Focus%20-%20Crane%20Ops.pdf

Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the National Police Air Service (NPAS) organisation via email npas.obstructions@npas.pnn.police.uk;

Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the **relevant Air Ambulance Units** - https://associationofairambulances.co.uk/member/london-ambulance-service-nhs-trust/

I would also recommend that this proposal should be brought to the attention of the Safeguarding Department within the MoD's Defence Infrastructure Organisation, email: DIO-safeguarding-statutory@mod.uk, to ensure that military aircraft safety is taken into consideration.

Finally, I would strongly recommend that London City airport is advised of this proposal.

Regards

Craig

Craig Jiggins
ATM Technical Specialist
Safety and Airspace Regulation Group (SARG) - Airspace Regulation
Civil Aviation Authority

020-7453 6559

www.caa.co.uk
Follow us on Twitter: @UK_CAA

4.100 Marker boards alternating with flags or cones, as described in paragraph 4.9.3 of chapter 7, should be used to delineate an unserviceable portion of a grass aerodrome.

Lighting of obstacles

4.101 Obstacle lights should be used to indicate the existence of objects which are to be lit as follows:

1. Low intensity steady red obstacle lights should be used on obstacles less than 45 m high, except that medium intensity steady red lights should be used to light such obstacles as an elongated structure, an obstacle in the outer area of the approach or high ground adjacent to the aerodrome circuit. There are two types of low intensity obstacle lights for fixed obstacles: Group A and Group B (see table 6A.1).
    a) Low intensity Group A lights should be used for obstacles on the movement area where Group B lights may cause dazzle.
    b) Low intensity Group B lights should be used away from the movement area or in areas on the movement area with high levels of background illuminance.
2. Medium intensity red steady obstacle lights should be used on obstacles between 45 m and less than 150 m in height.
3. Medium intensity steady red obstacle lights should be used to indicate the presence of:
    a) an obstacle if its height is 150 m or more; or
    b) a tower supporting overhead wires, cables etc. of any height where an aeronautical study indicates such lights to be essential for recognition of the presence of the obstacle.

4.102 However, where an aeronautical study conducted by the CAA concludes that greater conspicuity of the obstacle through the use of a higher specification light is required, the use of a high intensity flashing white obstacle light will be considered by the CAA.

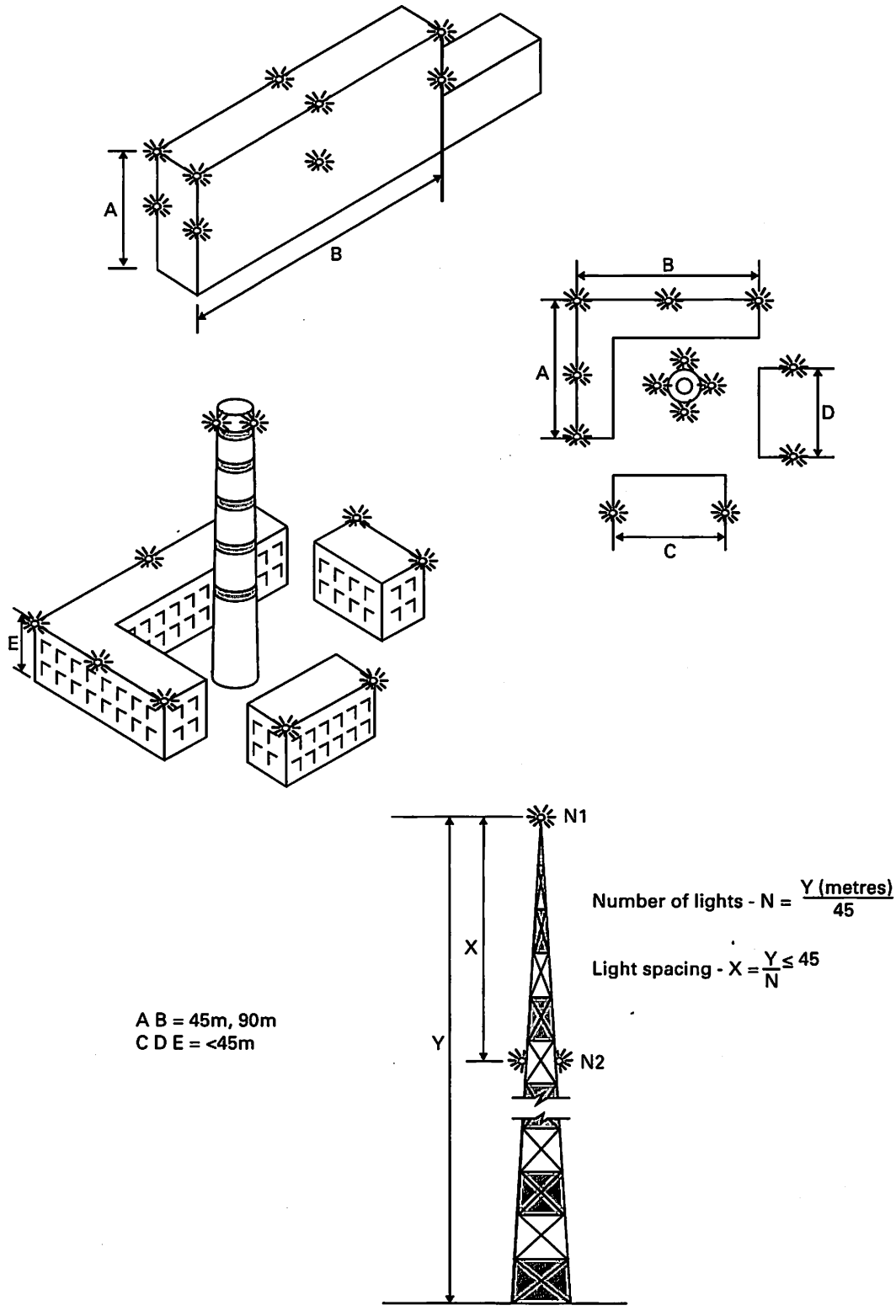
4.103 The combination of white and red obstacle lights should not be used at the same time to light an obstacle.

Location of obstacle lights (figure 4.18)

4.104 The top light

1. Except in the case of a chimney or other similar structure, one or more lights should be located at the top of the obstacle. The lights should be so arranged as to indicate the highest points or edges of the obstacle relative to the obstacle limitation surface. If two or more edges are of the same height, the edge nearest the flight path should be lit. On facing sides of groups of obstacles, lights may be omitted with the approval of the CAA, and the group treated as one solid obstacle.
2. In the case of a chimney or other similar structure, the top light should be placed between 1.5 m and 3.0 m below the top in order to reduce the effects of discolouration or corrosion from the exhaust fumes.
3. In the case of a guyed tower or antenna where it is not possible to locate an obstacle light on the top because of the weight of equipment involved, such a light should be located at the highest practicable point acceptable to the CAA.
4. In the case of a wind turbine, obstacle lights should be installed on the highest point of the nacelle in such a manner as to provide an unobstructed view for aircraft approaching from any direction.

Figure 4.18 Lighting of objects

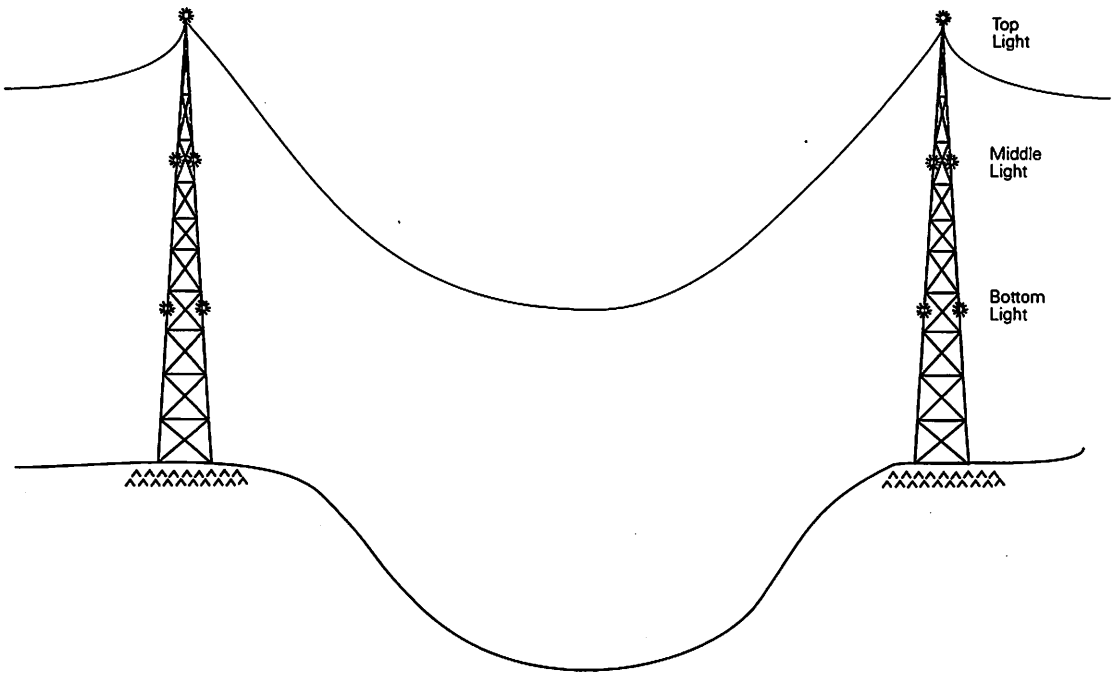


Intermediate lights

4.105 Where the top of an obstacle is more than 45 m above the level of the surrounding ground, additional lights should be provided at intermediate levels. These additional lights should be spaced as equally as practicable between the top light and ground level as follows:

1. when low or medium intensity obstacle lights are used the spacing should not exceed 52 m;
2. where deemed necessary by an aeronautical study, the spacing of high intensity flashing white obstacle lights on an obstacle other than a tower supporting overhead cables or wires should not exceed 105 m;
3. where obstacle lights are used on a tower supporting overhead wires or cables (figure 4.19) they should be located at three levels:
   a) on the top of the tower;
   b) on the tower at the lowest level of the catenary of the wires or cables; and
   c) at approximately mid-way between these two levels.
4. at each level the lights should be arranged to give full cover in azimuth.

Figure 4.19 Example of intermediate lighting



Lighting of unserviceable parts of the movement area

4.106 Unserviceable parts of the movement area of an aerodrome used at night should be lit as follows:

1. to delineate unsafe areas, lights should be spaced at intervals of not more than 7.5 m;
2. to close off unserviceable sections of runways or taxiways, lights should be spaced at intervals of not more than 3 m.

Note: The normal runway and taxiway lighting within the unserviceable area should be suppressed.

4.107 A light used to mark unserviceable parts of the movement area should consist of a steady red light of sufficient intensity to ensure conspicuity, considering adjacent lights and the general level of illumination against which it would normally be viewed. It should have a minimum intensity of not less than 10 cd.

Lighting of vehicles

4.108 The responsibility for marking and lighting vehicles used on the movement area must be determined between the licence holder and the operators of the vehicles. Licence holders are responsible for ensuring that vehicles on the movement area are lit and/or marked as required, irrespective of ownership.

4.109 The specification for yellow flashing vehicle obstacle lights is given in chapter 6, appendix A, table 6A.1. Strobe lighting is unacceptable. Obstacle lights for 'Follow-me' vehicles only shall have characteristics described in figure 6A 19.

4.110 The lights specified should be fitted at the highest point of the prime mover vehicle.

4.111 The highest point of trailers should be fitted with steady red lights of not less than 10 cd.

4.112 Obstacle lights on vehicles should be switched on whenever the vehicles are within the movement area; however, the number of vehicles displaying flashing lights should be restricted to the operational minimum.

4.113 Aerodrome ambulances, fire and rescue appliances should, in addition, carry blue flashing lights for use while carrying out emergency duties.

4.114 In conditions where emergency vehicles not normally based at an aerodrome are called upon for assistance, flashing blue lights, where fitted, should be operated within the movement area.

Light characteristics (see chapter 6, appendix A, table 6A.1)

Low intensity obstacle lights

4.115 On fixed obstacles, low intensity lights should be steady red and omni-directional.

Medium intensity obstacle lights

4.116 Medium intensity obstacle lights should be steady red light.

High intensity obstacle lights

4.117 High intensity obstacle lights should be flashing white lights.

Replacement of lamps

4.118 Unserviceable lamps should be replaced as soon as possible and in any event within 24 hours. Periodic replacement of all lamps is advisable – the active life being deemed to be 80% of the rated lamp life. Where such preventive maintenance cannot be arranged, tungsten lamps may be underrun on voltage down to a minimum of 90% of rated voltage, provided that the specified output can be met. This procedure should increase lamp life to about 400% of the rated lamp life. When this procedure is used, preventive replacement should be carried out after the increased interval. The requirements for periodic change of lamps may, however, be varied or waived where fittings having acceptable performance and proved life are used.

Note: NOTAM action should be taken to promulgate unserviceabilities.

Periods of illumination of obstacle lighting

4.119 High intensity flashing white obstacle lights should be lit at all times throughout the day and night.

4.120 Steady red medium and low intensity obstacle lights should be lit:

1. on and adjacent to an aerodrome from 30 minutes before sunset to 30 minutes after sunrise during the hours of availability notified in the UK AIP or by NOTAM;
2. on en route obstacles from 30 minutes before sunset to 30 minutes after sunrise. Should switching present problems, these lights may remain lit continuously.

The Office of the General Counsel

Civil Aviation Authority

The Air Navigation Order 2016 and Regulations

Published for the use of those concerned with air navigation,
but not to be treated as authoritative (see Foreword)

CAP 393

CHAPTER 2

Lights and lighting

Aeronautical lights

221.—(1) Except with the permission of the CAA and in accordance with any conditions subject to which the permission may be granted, a person must not establish, maintain or alter the character of—

(a) an aeronautical beacon within the United Kingdom; or

(b) any aeronautical ground light (other than an aeronautical beacon) at a national licensed aerodrome, or which forms part of the lighting system for use by aircraft taking off from or landing at such an aerodrome.

(2) In the case of an aeronautical beacon which is or may be visible from the waters within an area of a general lighthouse authority, the CAA must not give its permission for the purpose of this article except with the consent of that authority.

(3) A person must not intentionally or negligently damage or interfere with any aeronautical ground light established by or with the permission of the CAA.

Lighting of en-route obstacles

222.—(1) The person in charge of an en-route obstacle must ensure that it is fitted with medium intensity steady red lights positioned as close as possible to the top of the obstacle and at intermediate levels spaced so far as practicable equally between the top lights and ground level with an interval of not more than 52 metres.

(2) The person in charge of an en-route obstacle must, subject to paragraph (3), ensure that by night the lights required to be fitted by this article are displayed.

(3) In the event of the failure of any light which is required by this article to be displayed by night the person in charge must repair or replace the light as soon as reasonably practicable.

(4) At each level on the obstacle where lights are required to be fitted, sufficient lights must be fitted and arranged so as to show when displayed in all directions.

(5) In any particular case the CAA may direct that an en-route obstacle must be fitted with and must display such additional lights in such positions and at such times as it may specify.

(6) A permission may be granted for the purposes of this article for a particular case or class of cases or generally.

(7) This article does not apply to any en-route obstacle for which the CAA has granted a permission to the person in charge permitting that person not to fit and display lights in accordance with this article.

(8) In this article, an "en-route obstacle" means any building, structure or erection, the height of which is 150 metres or more above ground level, but it does not include a building, structure or erection—

(a) which is in the vicinity of a national licensed aerodrome or an EASA certificated aerodrome; and

(b) to which section 47 of the Civil Aviation Act 1982 (warning of presence of obstructions near licensed aerodromes) applies.

Lighting of wind turbine generators in United Kingdom territorial waters

223.—(1) Subject to paragraph (10), this article applies to any wind turbine generator—

(a) the height of which is 60 metres or more above the level of the sea at the highest astronomical tide; and

(b) which is situated in waters within or adjacent to the United Kingdom up to the seaward limits of the territorial sea.

(2) Subject to paragraph (3) the person in charge of a wind turbine generator must ensure that it is fitted with at least one medium intensity steady red light positioned as close as reasonably practicable to the top of the fixed structure.

(3) If four or more wind turbine generators are located together in the same group, with the permission of the CAA only those on the periphery of the group need be fitted with a light in accordance with paragraph (2).

(4) Subject to paragraph (5), the light or lights required by paragraph (2) must be so fitted as to show when displayed in all directions without interruption.

(5) When displayed—

(a) the angle of the plane of the beam of peak intensity emitted by the light must be elevated to between three and four degrees above the horizontal plane;

(b) not more than 45% or less than 20% of the minimum peak intensity specified for a light of this type is to be visible at the horizontal plane;

(c) not more than 10% of the minimum peak intensity specified for a light of this type is to be visible at a depression of 1.5 degrees or more below the horizontal plane.

(6) Subject to paragraph (7), the person in charge of a wind turbine generator must ensure that by night, any light required to be fitted by this article is displayed.

(7) In the event of the failure of any light which is required by this article to be displayed by night the person in charge of a wind turbine generator must repair or replace the light as soon as reasonably practicable.

(8) If visibility in all directions from every wind turbine generator in a group is more than 5km the light intensity for any light required by this article to be fitted to any generator in the group and displayed may be reduced to not less than 10% of the minimum peak intensity specified for a light of this type.

(9) In any particular case the CAA may direct that a wind turbine generator must be fitted with and display such additional lights in such positions and at such times as it may specify.

(10) This article does not apply to any wind turbine generator for which the CAA has granted a permission to the person in charge permitting that person not to fit and display lights in accordance with this article.

(11) A permission may be granted for the purposes of this article for a particular case or class of cases or generally.

(12) In this article—

(a) "wind turbine generator" is a generating station which is wholly or mainly driven by wind;

(b) the height of a wind turbine generator is the height of the fixed structure or if greater the maximum vertical extent of any blade attached to that structure; and

(c) a wind turbine generator is in the same group as another wind turbine generator if the same person is in charge of both and—

(i) it is within 2km of that other wind turbine generator; or

(ii) it is within 2km of a wind turbine generator which is in the same group as that other wind turbine generator.

Lights liable to endanger

224.—(1) A person must not exhibit in the United Kingdom any light which—

(a) by reason of its glare is liable to endanger aircraft taking off from or landing at an aerodrome; or

(b) by reason of its liability to be mistaken for an aeronautical ground light is liable to endanger aircraft.

(2) If any light which appears to the CAA to be a light described in paragraph (1) is exhibited, the CAA may direct the person who is the occupier of the place where the light is exhibited or who has charge of the light, to take such steps within a reasonable time as are specified in the direction—

(a) to extinguish or screen the light; and

(b) to prevent in the future the exhibition of any other light which may similarly endanger aircraft.

(3) The direction may be served either personally or by post, or by affixing it in some conspicuous place near to the light to which it relates.

(4) In the case of a light which is or may be visible from any waters within the area of a general lighthouse authority, the power of the CAA under this article must not be exercised except with the consent of that authority.

Lights which dazzle or distract

225. A person must not in the United Kingdom direct or shine any light at any aircraft in flight so as to dazzle or distract the pilot of the aircraft.

PART 9

Documents and records

Aircraft continuing airworthiness record system for non-EASA aircraft

226.—(1) In addition to any other log books required to be kept by or under this Order, aircraft continuing airworthiness records must be kept for non-EASA aircraft registered in the United Kingdom, comprising of—

(a) an aircraft log book;

(b) a separate engine log book or engine module log cards for each engine fitted in the aircraft; and

(c) a separate propeller log book for each variable pitch propeller fitted to the aircraft; and

(d) log cards for any service life limited component, as appropriate.

(2) The continuing airworthiness records must include the information specified in Schedule 7.

(3) Each entry in the continuing airworthiness records—

(a) must be made—

(i) in the case of a certificate of release to service, as soon as practicable, but in no case more than 30 days after the date on which the maintenance was completed;

(ii) in all other cases, as soon as practicable after the occurrence to which it relates, but in no event more than 7 days after the expiration of the national airworthiness review certificate in force for the aircraft at the time of the occurrence;

(b) must be made on each occasion that any overhaul, repair, replacement, modification, maintenance or inspection is undertaken on the engine or propeller;

(c) must be clear and accurate; and

(d) where it is necessary to correct an earlier entry in the aircraft continuing airworthiness records, must be made in a manner that clearly shows the original entry.

(4) Any document which is incorporated by reference in the continuing airworthiness records is deemed, for the purposes of this Order, to be part of the continuing airworthiness records.

(5) It is the duty of the operator of every aircraft for which continuing airworthiness records are required to be kept to—

(a) keep them or cause them to be kept in accordance with this article; and

DARTFORD BOROUGH COUNCIL

Please ask for: Sonia Bunn
Direct Line: (01322) 343620
Direct Fax: (01322) 343047
E-mail: Sonia.bunn@dartford.gov.uk
DX: 142726 Dartford 7
Your Ref: **EN010093-00004**
Our Ref: DA/17/02011/OBB
Date: 22nd December 2017

Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir,

Town and Country Planning Act 1990

Consultation on an application under Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) Regulations 10 and 11 for scoping opinion as to the information to be provided in an Environmental Statement (ES) relating to the Development.
Riverside Energy Park

I refer to the above application which has now been considered by the Borough Council and wish to thank you for the opportunity to comment thereto.

The Council welcomes the opportunity to comment on the Scoping Report submitted in relation to the Riverside Energy park and would request that the attached detailed comments are taken into consideration when issuing the Scoping Opinion.

Yours faithfully

[redacted]

DIRECTOR OF REGENERATION

Dartford Borough Council response to scoping consultation
Application for Riverside Energy Park
DCB ref: 17/02011/OBB

Transport

The Council would like to understand whether the traffic impacts will extend to Dartford Borough, which given that several strategic interchanges, including the Dartford Crossing, are located in the Borough, is very likely. In this case the cumulative impacts of development in the DBC should also be assessed.

Traffic generation and routing of vehicles to the development via junction 1a of the M25, will result in increased traffic on local roads in Dartford and together with the reassignment of vehicles at times of congestion could have a wider impact.

Construction traffic will be particularly likely to use the strategic road network in Dartford which is already under significant stress and this impact should be considered. Improvements to A282 Junction 1A are currently ongoing and are likely to impact/ be impacted by the proposed development.

Although the proposal indicates that much of the waste comes from London the Council would like to understand the potential traffic impacts of any waste that does not come from west of the site but comes from the east or uses the Dartford Crossing.

Other transport impacts that should be addressed include the social impact of increased traffic in an already congested area which appear to be considered through the assessment criteria for the Transport Assessment outlined on pgs 29-30 but the Council would request that the study area includes Dartford Borough.

Construction impacts of Option 2

Local Road Network: Construction and operational impacts of the development on Dartford's local road network must be assessed. Construction impacts could be substantial along Bob Dunn Way, particularly if the undergrounding of cables involves road closures. This will particularly affect local traffic from the Bridge site, for which there is only one access point off Bob Dunn Way. Operational impacts will likely include through traffic using the Borough's road network to transport waste to REP.

In addition reduction in capacity on the local road network, as a result of any construction work in the carriageway, which provides a key feeder road to the Dartford crossing may result in impact on the wider strategic network and could result in vehicles diverting into Dartford town centre network. This impact should also in the Council's opinion be assessed

Air Quality

The impact of increased traffic on air quality in the wider area should be considered, particularly on the AQMAs at Dartford Crossing (A282: Dartford Tunnel Approach Road) and Dartford town centre which will be impacted on by increase traffic using the strategic road network and diverting traffic if there is congestion.

Air quality issues arising from the increase in vehicular traffic during both construction and operation should also be addressed and this should include traffic impacts as set out above.

The Council is willing to assist and provide further information to the applicant with regard to the air quality issues at these AQMA and on the local and strategic road network.

The Council would draw PINs attention to the fact that the Port of London Authority is also currently consulting on its own Air Quality Strategy for the Tidal Thames, which should be taken into account in any assessment.

Cumulative Development Impacts

There are several schemes in the vicinity of the proposed works that could further impact on the local area. The cumulative impact of these developments will need to be taken into account, particularly in relation to transport impacts. Such developments include:

- Extant permission exists for mineral extraction at Joyce Green Quarry. Current planning applications are being considered by KCC to bring the site back into use for mineral extraction, which may have a 10 year lifespan if approved. This site will access Bob Dunn Way via Joyce Green Lane.
- The emerging KCC Minerals Site Allocations Plan includes two potential site allocations in the vicinity of Joyce Green Quarry, which will again require access to Bob Dunn Way.
- The Bridge development site is currently subject to further applications that will potentially increase the level of residential development in this location by an additional 190 units, leading to further pressure on the highway network.
- There are other potential development sites in and around Dartford Town Centre that have the potential to cumulatively impact on the local road network over both the construction and operational phases of the development.

Other issues

Ongoing function of Littlebrook Substation

The status of Littlebrook Substation is unknown. The adjacent power station was decommissioned in 2015 and the new owners are actively considering redevelopment options. Will the substation still be operational in 2021 when construction is due to begin on REP? Given the current pre-app discussions, could this proposal compromise the redevelopment of the wider site?

The impact of the proposal on redevelopment of the adjacent brownfield land at Littlebrook Power Station is something the Council consider should be assessed.

From:	KSLPlanning
To:	Riverside Energy Park
Cc:	Martyn, Joe
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	29 November 2017 16:43:15
Attachments:	image001.gif image002.gif image003.gif image004.gif image005.gif image006.gif

---

Dear Sir/Madam,

EN010093-000004 - Riverside Energy Park, Belvedere

Thank you for consulting the Environment Agency on the above proposal which we received as a valid consultation on 28 November 2017. It is now being progressed under our reference number SL/2017/117720/01 and the case officer is Joe Martyn.

We will aim to respond within 21 days of receipt, but if you require urgent comments please email kslplanning@environment-agency.gov.uk quoting our reference number above.

Kind regards,

Tim Charlton
Planning Advisor
Environment Agency | Kent & South London | South London Sustainable Places team

kslplanning@environment-agency.gov.uk
020 3024 8327 | +44 20 3024 8327 | 48327
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF

cid:image006.gif@01D36839.4E970120

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:24
To: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>; HNL Sustainable Places <HNLSustainablePlaces@environment-agency.gov.uk>; KSLPlanning <KSLPLANNING@environment-agency.gov.uk>
Subject: Riverside Energy Park - EIA Scoping notification and consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Riverside Energy Park.

Please note the deadline for consultation responses is 26 December 2017. This deadline is a statutory requirement that has been triggered by submission of the Applicant's scoping report and cannot be extended.

From:	ESP Utilities Group Ltd
To:	Riverside Energy Park
Subject:	Your Reference: Riverside Energy Park. Our Reference: PE133632. Plant Not Affected Notice from ES Pipelines
Date:	08 December 2017 14:34:25
Attachments:	ESN017080 P__Engineering_ESP_ESN016000 - ESN017999_ESN017080 Erith Park_Drawings_Proposal_2017-01-06 Variation 1_B9647223-3 AWH2778-3 Gas Drawing A0 (.pdf UKP3157 - DWG301 - Rev1 - Site Layout and Cable Routes - iDNO - (Sheet 3).pdf UKP1326 - DWG301 - Rev7 - Site Layout and Cable Routes.pdf MN 209080-JB-003 - IDNO LV Design - P1.pdf

Riverside Energy Park
The Planning Inspectorate

8 December 2017

Reference: Riverside Energy Park

Dear Sir/Madam,

Thank you for your recent plant enquiry at (Riverside Energy Park).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works. **But, there are gas and electricity networks nearby. Proposal drawings and final as-laid drawings are enclosed.**

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

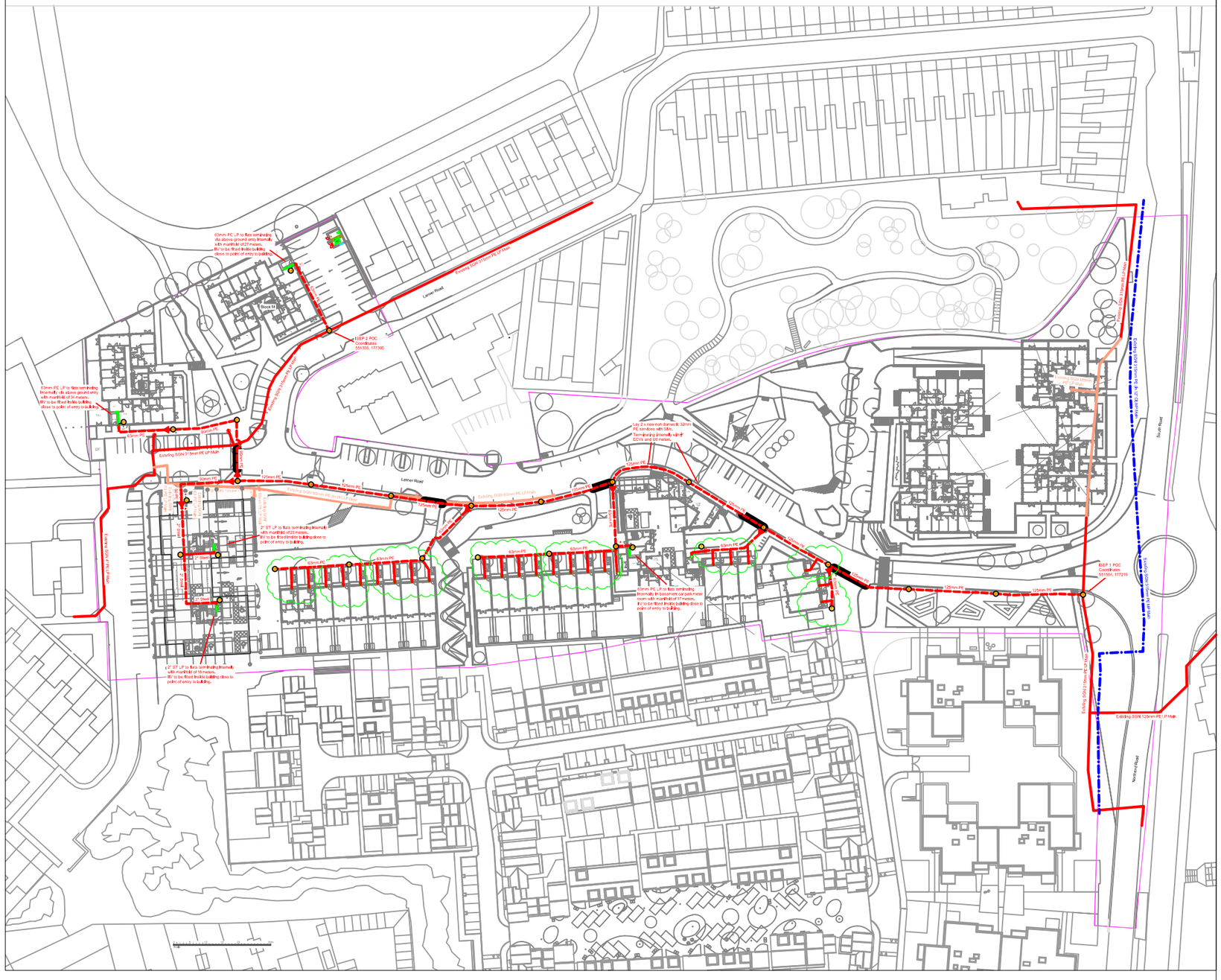
Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com

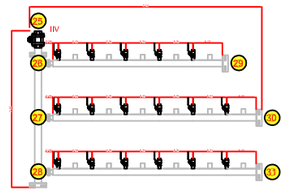
Yours faithfully,

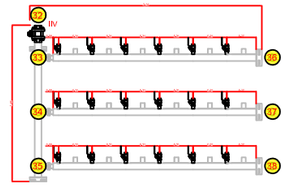
Alan Slee
Operations Manager

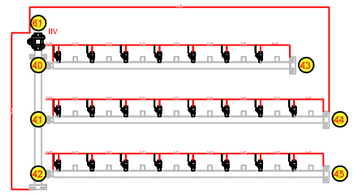
Bluebird House
Mole Business Park
Leatherhead
KT22 7BA
☎ 01372 587500 01372 377996

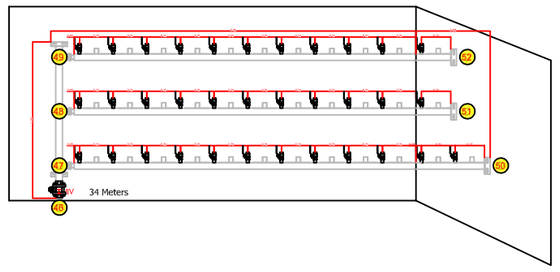
http://www.espug.com











Manifold Schematics

2" steel riser with 1¼" steel laterals and 50mm long ¼" steel offtakes for each meter.
ALLOW FURTHER ½ METRE ABOVE HEIGHT SHOWN FOR METER INSTALLATION

IIV to be fitted inside building close to point of entry to building. Alternatively a building entry tee with an integral valve operable only by a special key

Please refer to table *Supporting Above Ground Network Pipelines* on this drawing for pipe support spacing.

ISEP 1 - Network Design:

Mains Design Pressure and Velocity	LP	MP
Source Pressure	25 mBar	mBar
Peak Flow	91.0 m3/hr	m3/hr
Maximum Velocity	6.98 m/s (On combi test)	m/s
Minimum Pressure	22.34 mBar (On combi test)	mBar
Pressure Drop	2.66 mBar	0 mBar

Connection	
Parent Main Operator	Scotia Gas Networks
Parent Main Dia	315mm
Parent Main Material	PE
Connection	Branch Saddle Connection
POC Coordinates	551564, 177219
Downstream Main	125mm PE

Mains Lengths (m) and Diameters	Pe		
	LP	MP	IP
63mm	190	63mm	63mm
90mm	63	90mm	90mm
125mm	276	125mm	125mm
180mm		180mm	180mm
250mm		250mm	250mm
315mm		315mm	315mm
355mm		355mm	355mm

Steel			
	LP	MP	IP
1 1/4"	30.7		
2"	58.4		

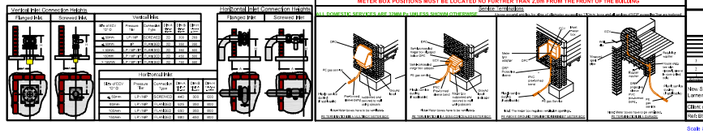
ISEP 2 - Network Design:

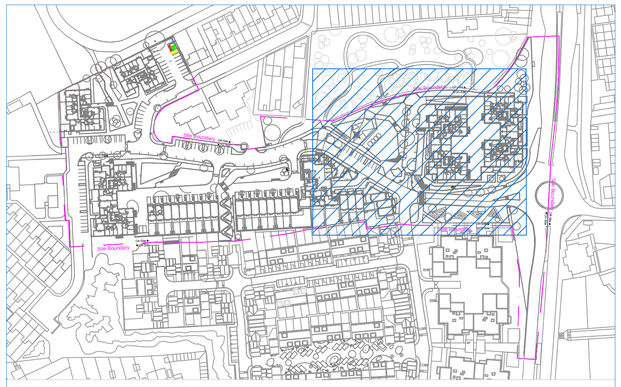
Mains Design Pressure and Velocity	LP	MP
Source Pressure	24 mBar	mBar
Peak Flow	22.4 m3/hr	m3/hr
Maximum Velocity	7.85 m/s (On combi test)	m/s
Minimum Pressure	22.69 mBar (On combi test)	mBar
Pressure Drop	1.31 mBar	0 mBar

Connection	
Parent Main Operator	Scotia Gas Networks
Parent Main Dia	315mm
Parent Main Material	PE
Connection	63mm Top Outlet Service Tee
POC Coordinates	551330, 177300
Downstream Main	63mm Pe

Mains Lengths (m) and Diameters	Pe		
	LP	MP	IP
63mm	24	63mm	63mm
90mm		90mm	90mm
125mm		125mm	125mm
180mm		180mm	180mm
250mm		250mm	250mm
315mm		315mm	315mm
355mm		355mm	355mm

Steel			
	LP	MP	IP
1 1/4"	9.3		
2"	1.3		





Key Plan

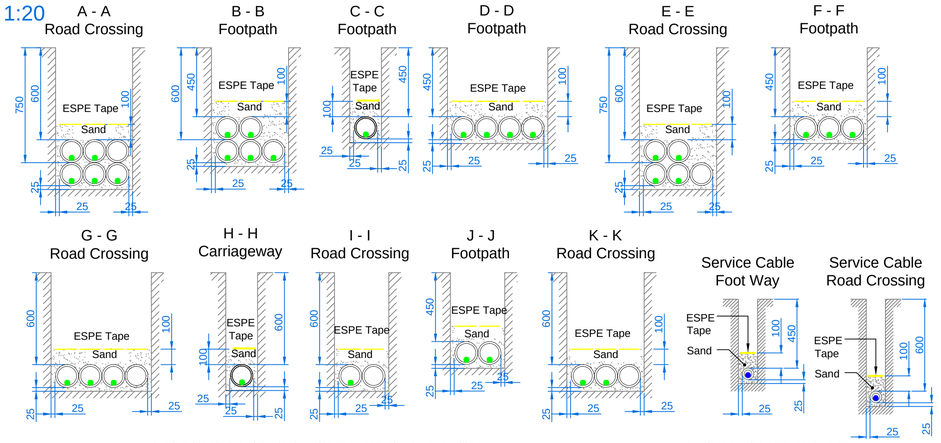
Site Address: Larner Road - Phase 2 Erith Park
London. DA8 3RH

Cable Installation Data

Cable Type	Max Pulling Tension	Minimum Bending Radius	Minimum Duct Size
300mm² Al Waveform 3c	7000N	850mm	125mm
185mm² Al Waveform 3c/ LSOH	7000N	700mm	125mm
185mm² Al Waveform 4c/ LSOH	7000N	800mm	125mm
95mm² Al Waveform 3c/ LSOH	3000N	550mm	125mm
95mm² Al Waveform 4c/ LSOH	3000N	600mm	125mm
35mm² Al Hybrid 1Ph /LSOH	Manual	125mm	50mm
35mm² Al Hybrid 3Ph LSOH	Manual	210mm	50mm

Cable Data

1:20



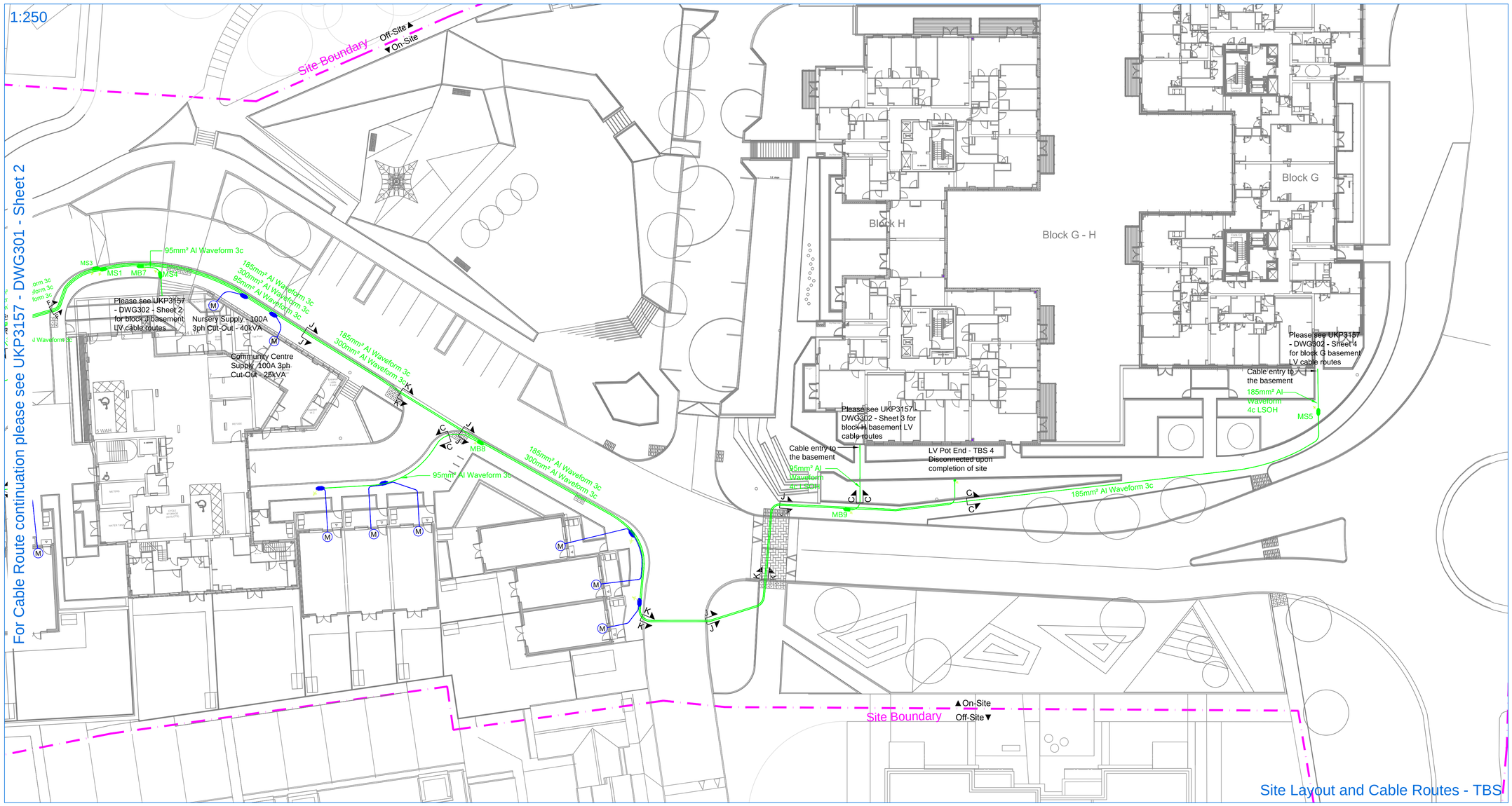
Excavation, installation of ducting/warning Tape and reinstatement will be carried out in accordance with the ESPE G81 and NRSWA requirements.

Sections service cable apply to all relevant service cable areas

Trench Cross Sections

Legend	
	New LV Cable
	Service Cable
	HV Point of Connection
	LV Breech Joint
	LV Straight Joint
	Pot End
	Service Joint
M	Metering Point
	Site Boundary
	DNO Equipment
	Earthing
	MSDB
	Streetlight
	HDCO

1:250



Site Layout and Cable Routes - TBS

For Project Scope and Material Specifications, please refer to UKP3157 - iDNO Project Information Document

REV	AMENDMENT	DATE	BY
1	LV cable route amendment	21/08/15	GJ

UKPOWER SOLUTIONS

River View House
Bonds Mill Estate
Stonehouse
Gloucestershire
GL10 3RF

Client: Wates

Project: Larner Road - Phase 2

Title: Site Layout and Cable Routes - iDNO

Planning Engineer: Jonathan Stock		Contact No.: 08452 577 105	
Project Manager: Antony Harding		Contact No.: 08452 577 105	
Drawn By: CH	Checked By: AF	Date: 05/03/2015	
Scale: As Shown	Sheet No.: 3/3	Original Size: A1	
Drawing No.: UKP3157 - DWG301		Rev: 1	

Drawing Status: For Design Approval

Not for Construction

Site

Site Address: Larner Road, Erith DA8 3RH

NOTE:
For cable installation phasing see UKP1326 - DWG306 to DWG311.
This drawing is to be read in conjunction with UKP1326 - DWG201 to DWG206.

Material Specification

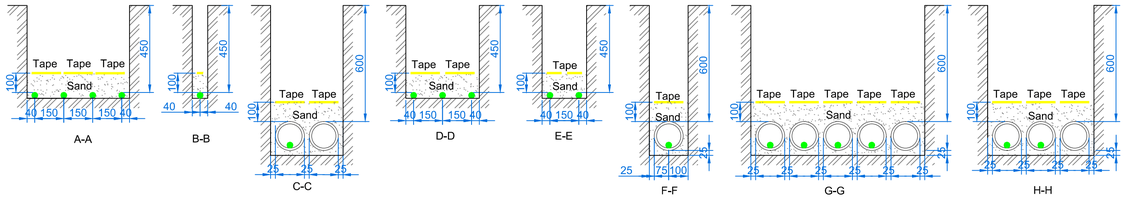
Material	Specification	Supplier	Standard
Substation	Transformer LV Fuse Cabinet 6 way Pillar	Schneider	ENATS 37-02
	1 MVA Transformer 11/0.433kV, Unit		ENATS 35-01
Fuses	92mm Industrial Fuse-Link 630A	Cooper Bussmann	BS88
Ducting	125mm Twin Walled Ridgiduct	Polypipe	ENATS 12-24
Tile Tape	Tile Tape for use up to 22kV	Centriforce	04040C
LV Mains Cable	300mm² Al Waveform	Prysmian	BS7870
	185mm² Al Waveform		
	95mm² Al Waveform		
Service Cable	35mm² Al Hybrid 1ph	Prysmian	BS7870
	35mm² Al Hybrid LSOH 1ph & 3ph		
Joints	Service Joints	Sicame Electrical	BS7888
	300-95mm² LV Breech Joints		
Cut Out	100A Single Phase CutOut	WT Henleys	BS7657
MSDB	24, 15, 10 Way 1J & 2J MSDBs with Removable Link	Lucy	-
LV Earthing	70mm Copper	-	-
	Earth Rod	-	-
Earthing	UKPN Spec. Earth Nest	As per DNO spec.	TBC

LV Cable Installation Data

Cable Type	Max Pulling Tension	Minimum Bending Radius (On Route)	Minimum Bending Radius (At Term)	Minimum Duct Size
300mm² Al Waveform	7000N	850mm	850mm	125mm
185mm² Al Waveform	7000N	700mm	680mm	125mm
95mm² Al Waveform	3000N	550mm	510mm	125mm
35mm² Al Hybrid	Manual	125mm	-	50mm

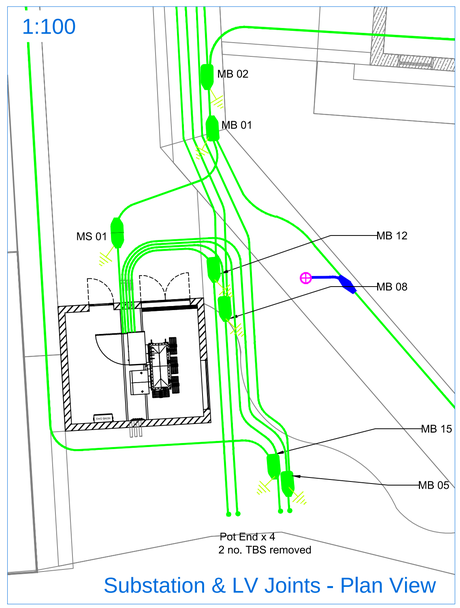
HV PoC
Existing HV Cable
HV Cable
Existing LV Cable
LV Cable
Site Boundary
Earth Rod
Car Charge Point
Street Light
LV Pot End

Legend

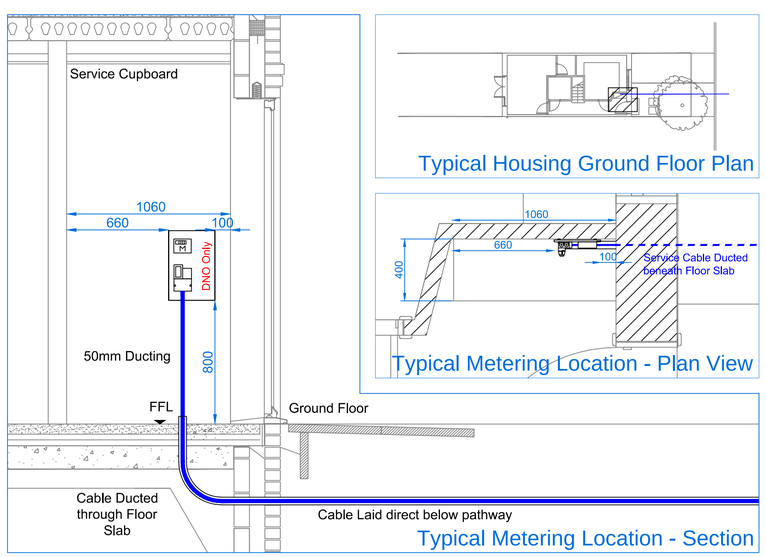


Cable Trench Cross Sections

1:100



Substation & LV Joints - Plan View



Typical Metering Location - Section

Typical Housing Ground Floor Plan

Typical Metering Location - Plan View

1:500

Site Layout and Cable Routes

Scope:
UK Power Solutions are to provide a new supply from a HV PoC to a new development at Larner Road, Erith, London DA8 3RH

Supply Capacity & Loads:
A capacity of 1000kVA has been reserved and is available at the UKPN point of connection.

The calculated demand for the development at Larner Road is 940kVA and has been derived from the following demands:

140 x Houses @ 2kVA - 280kVA
203 x Apartments @ 1.5kVA - 305kVA
8 x Landlord Supplies @ 10kVA - 80kVA
1 x Energy Centre Supply @ 160kVA
34 x Street Lights @ 0.1kVA - 3.4kVA
1 x Home Zone Feeder Pillar @ 8.7kVA
16 x Car Charging Points @ 7.7kVA - 131kVA

2x Temporary Building Supplies @ 300kVA & 500kVA

Supply Exit Points:

The supply exit point of the TBS supplies will be the outgoing terminals of the customers Service Termination Cubicle MCCB and will be CT metered via a WAGO metering unit.

The supply exit points of the housing, apartments landlord supplies and street light feeder pillar will be the outgoing terminals of the 100A 1ph & 3ph cut-outs and will be whole current metered.

The supply exit point of the energy centre landlord supply will be the outgoing terminals of the 400A Heavy Duty Cut-Out and will be CT metered.

Disturbing Loads:
Please refer to UKP1326 - DWG200

HV Point of Connection:
The HV Point of Connections shall be made via to a Looped connection for the new IDNO owned substation.
Grid Reference: TQ5177SW
ESPipeline Reference: ESPE0417
UKPN Ref: 401232444

LV Cable:
300, 185, 95mm² 3-Core Al waveform & 35mm² Al Hybrid shall be utilised to install throughout the LV Network. All LV Cable will be installed according to the relevant trench cross section detail.

Temporary Building Supply:
2 no. TBS of 400kVA will be provided.
The supply exit point of the TBS will be the outgoing terminals of the service termination cubicle

REV	AMENDMENT	DATE	BY
7	LV Route Amended	06/05/15	CH
6	LV Route Amended	16/03/15	JS
5	LV Route Amended	05/03/15	CH
4	Design Approved	25/09/13	CH
3	Block C Riser Amendments	14/08/13	KT
2	TBS Relocated	21/07/13	JS
1	Cut-out Locations Verified	28/06/13	JR

UK POWER SOLUTIONS
River View House
Bonds Mill Estate
Stonehouse
Gloucestershire
GL10 3RF

Client: Wates

Project: Larner Road

Title: Site Layout & Cable Route

Planning Engineer: Jonathan Stock	Contact No.: 01453 793964
Project Manager: TBC	Contact No: TBC
Drawn By: CH	Checked By: AW
Date: 29/05/2013	
Scale: As Shown	Sheet No.: 1/1
Original Size: A1	
Drawing No.: UKP-EC-SITE-61-301	Rev: 7
Drawing Status: Design Approved	

N

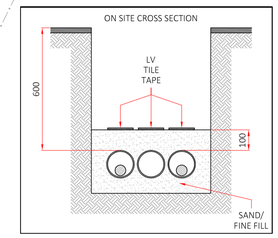
SUPPLY & INSTALL
2No. 2-WAY LINK BOX

2No. 300mm² WAVEFORM
LV CABLE
in 125mm ID DUCT

TERMINATE IN 2No. 600A
LUCY CUT-OUT COMBINED
WITH CT CHAMBER

FASTRACK BUS STATION

ON SITE CROSS SECTION



LEGEND

Proposed Underground LV Cable

Proposed Underground Duct

Site Address:

Notes:

Rev:	Date:	Details:	Eng:	Chk'd:

Matrix Networks LTD
6500 Daresbury Park
Warrington
Cheshire
WA4 4GE
Tel: 0844 7400074
Fax: 0844 7400075

• electricity • water • gas • telecoms • renewables

Client: WINVIC CONSTRUCTION

IDNO: ESP ELECTRICITY

Drawn By:	App:	SCALE @ A1	1:500
JLR	-		
Eng:	Date:	SCALE @ A3	1:1000
JB	25.02.14		

Status: FOR APPROVAL

Drawing Title:

LITTLEBROOK MANOR WAY
DARTFORD
PROPOSED LV DESIGN - IDNO

Drg No: MN209080-JB-003

Rev: P1

HSE
Health and Safety Executive

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: EN010093
Our ref: 4.2.1.6203
HSE email: NSIP.applications@hse.gov.uk

FAO Hannah Pratt
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

15/12/17

Dear Ms Pratt

PROPOSED RIVERSIDE ENERGY PARK (the project)
PROPOSAL BY CORY ENVIRONMENTAL HOLDINGS LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11

Thank you for your letter of 28th November 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

The red line indicative application boundary of the development falls with the consultation zones of:

Littlebrook D Power station (HSE ref H3052)
Henkel Ltd. (HSE ref H3322)
Nufarm UK Ltd Crabtree Manorway (HSE ref H0260)
Calor Gas, Burts Wharf Industrial Estate (HSE ref H4298.

HSE may advise against the development depending on what was proposed within the consultation zones.

There are currently no pipelines within the development. If in the intervening period we are notified of a change to this situation, the Applicant would need to seek advice from us.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Explosives sites

HSE has no comment to make as there are no licensed explosive sites in the vicinity.

Waste

In respect of waste management the applicant should take account of and adhere to relevant health and safety requirements. More details can be found on HSE's website at: http://www.hse.gov.uk/waste/index.htm.

Electrical Safety

No comment from a planning perspective

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,

[redacted]

Dave Adams
(CEMHD4 Policy)

From:	Gregory, Andree
To:	Riverside Energy Park
Cc:	Planning SE
Subject:	#4118 Response EIA Scoping Report EN010093-00004 Riverside Energy Park, Normal Road, North Belvedere, DA17 6JY
Date:	15 December 2017 12:19:26

For the attention of: Hannah Pratt

Site: Riverside Energy Park, Normal Road, North Belvedere, DA17 6JY

Development: EIA Scoping Report

Your Reference No: EN010093-00004

Highways England's Ref No: 5266

Dear Hannah Pratt,

Thank you for your consultation letter dated 28th November 2017 on the above EIA scoping request for an integrated Energy Park consisting of complementary energy generating development, with an electrical output of up to 96 megawatts, together with a new connection to the existing electricity network and provision for Combined Heat and Power readiness. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England have no comment on whether an EIA is required; but if it is (or is produced voluntarily), it should be compatible and consistent with the Transport Assessment and also contain information on all transport related effects including noise, vibration and air quality.

In the case of this proposed development, Highways England is interested in the potential impact that the development might have upon the M25, in particular Junction 1A. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the strategic road network as a result of development.

The method of assessment for the EIA should be in line with Highways England's recommended method of drawing upon the information presented in the required Transport Assessment.

Highways England should also be included in the discussions for the Transport Assessment scope. We are happy to attend any meetings. Any assessment should be undertaken in accordance with the DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development" outlining how Highways England will engage with developers including assessment

requirements to deliver growth and safeguard the operation of the SRN. This includes a robust assessment of the vehicular impacts “with” and “without” development for the horizon year (full occupation) and the end of the Local Plan period to examine the net impact of non-consented development. Any modelling will also need to accurately reflect the Local Plans of neighbouring authorities.

We would be happy to liaise with the applicant’s consultants in particular in advance of their submission of Transport Scope.

I trust you find these comments useful. Please do not hesitate to contact me if you require further information

Andree Gregory
Spatial Planning Administrator
Tel: +44 (0) 300 470 1256
Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ
Web: http://www.highways.gov.uk

Historic England

Our ref: PL00237362

Hannah Pratt
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

By email: RiversideEP@pins.gsi.gov.uk

20 December 2017

Dear Sir/Madam

Consultation on EIA scoping report for Development Consent Order for Riverside Energy Park

Thank you for consulting Historic England on the EIA scoping report for the Development Consent Order for the Riverside Energy Park.

As the Government's statutory adviser, Historic England is keen to ensure that conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process. Accordingly, we have reviewed this consultation in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for this and future generations.

In broad terms, we welcome the approach to historic environment considerations set out in the scoping report and consider that this is an appropriate and proportionate assessment of the likely significant effects of the development. We would, however, make the following detailed comments on the text.

We welcome the identification of the Crossness Conservation Area, associated listed buildings and Lesnes Abbey as heritage assets potentially affected by the development within table 7.5.1. While we note that the proposed development is at some distance from these assets and that the local area has been predominantly industrial in character for some time, we would suggest that the assessment of any effects on the setting of these assets is underplayed in the methodology as set out.

In terms of table 7.5.2, we note that visual impacts affecting Lesnes Abbey have been included. It is not however apparent if views affecting the Crossness conservation area and

the listed buildings within it will form part of this assessment. If this is not the case, we recommend that they should be included.

We also recommend that potential effects on the setting of the conservation area should be reflected in the assessment methodology – the conservation area is an important component of townscape character and should be explicitly referenced at paragraph 7.5.18. The London Borough of Bexley's conservation area appraisal and management plan will help establish the significance and sensitivities of these assets and should be referenced in the environmental statement.

Historic England would recommend that the methodology for assessing setting reflects the Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/). We would encourage the adoption of the staged approach to the assessment of setting as outlined at paragraph 12 of our advice. This document should also be reflected at paragraph 7.5.31 of the scoping document.

Paragraph 7.6.1 indicates that a desk-based assessment and a geo-archaeological statement will form part of the Historic Environment Chapter. We recommend that this text is amended to include reference to archaeological field surveys and evaluations should they prove necessary.

Section 7.6.7 lists sources to be consulted for the archaeological desk-based assessment report. We recommend that this is extended to include Local Studies Library and any other readily accessible evidence held elsewhere. Section 7.6.13 lists the potential scope of ground impact work represented by the scheme – we would suggest the addition of possible attenuation tanks. We suggest that table 7.6.2 be amended to refer to the *significance* of heritage assets in relation to direct and indirect impacts. This would reflect the terminology of the NPPF.

Finally, we note that the proposed development straddles administrative boundaries. We would therefore stress that it will be important to engage with relevant historic environment expertise at local government level as the proposals progress.

Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

I trust these comments are helpful. Please do not hesitate to contact me should you require any further information or clarification.

Yours sincerely

[redacted]

Tim Brennan MRTPI
Historic Environment Planning Adviser
E-mail: tim.brennan@HistoricEngland.org.uk
DD: 020 – 7973 3744

Hannah Pratt
EIA & Land Rights Advisor – Environmental Services Team
Planning Inspectorate
Major Applications and Plans
3D Eagle Wing
Temple Quay House
Temple Quay
Bristol
BS1 6PN

BY EMAIL ONLY

Environment, Planning & Enforcement

Invicta House
County Hall
MAIDSTONE
Kent ME14 1XX

Phone: 03000 419618
Ask for: Alexander Payne
Email: alexander.payne@kent.gov.uk

21 December 2017

Dear Ms Pratt,

Re: Proposed application for the granting of a Development Consent Order (DCO) for the Riverside Energy Park, Belvedere

Thank you for your letter dated 28 November 2017, providing Kent County Council (KCC) with the opportunity to inform the Secretary of State on the information to be provided in the Environmental Statement (ES) relating to the proposed Riverside Energy Park (REP), Belvedere.

The County Council has reviewed the Scoping Report submitted by the applicant and for ease of reference, provides a commentary structured under the chapter headings used in the report.

4.5 Local Planning Policy and Guidance

The application boundary shown in Appendix B includes parts of Kent and includes roads such as the A206 Bob Dunn Way and Rennie Drive for which Kent is the Local Highway Authority. Accordingly, all KCC policies should therefore be referenced in Chapter 4, such as the Local Transport Plan 4: Delivering Growth Without Gridlock.

7.2 Transport

Highways and Transportation

Paragraph 7.2.8 (p28) states “the majority of impacts are only likely to affect the immediate local area and delivery routes.” However, KCC advises that the nearest point of access to the A282/M25 strategic road network is on local roads through Kent, including the A206 Bob Dunn Way. Therefore, there is likely to be an impact on this route which may require assessment, particularly given that even a modest increase in traffic (especially HGVs) will have a substantial impact on traffic conditions and the associated environmental impacts. There is a significant amount

of planned development within the boundary of Dartford Borough Council (DBC), which needs to be taken into account as part of the cumulative assessment.

The assessment of the transport related environmental effects follows the correct guidance, as noted in paragraphs 7.2.9-11 (p28-29). However, KCC requests that the applicant considers the impacts on the links through Kent's road network to Junction 1A of the M25, as it is likely these will used by a significant proportion of the traffic associated with the development, in order to access the strategic road network.

Whilst paragraph 7.2.15 (p29) states that the industry standard software TEMPRO will be used to forecast traffic growth, KCC has found that for recent planning applications in Dartford, the model underestimates the quantum of development set out in DBC's Core Strategy (2011). KCC requests confirmation that Dartford's high levels of growth are to be correctly forecasted as part of the assessment of this proposal.

The transporting of goods using the River Thames during the construction and operational phases is supported, although there is some uncertainty regarding the split between river and road transport during the operational phase. Whilst there is a target for 75% of all trips to and from the site to use river transport during the operational phase, there is still uncertainty regarding the use of the river and the proposed sensitivity test assuming 100% of trips by road, is essential.

Public Rights of Way (PRoW)

The Indicative Zoning Plan indicates that the proposed development is unlikely to have a significant impact on Kent's PRoW network, as the site is located in the neighbouring London Borough of Bexley (LBB). However, the Electrical Connection Route (ECR) Option Two passes through the KCC boundary and would likely affect the following PRoWs: DB1, DB2, DB3 DB5, DB8, DB50 and DB56.

The Scoping Report states that this ECR would be predominantly routed along the existing road network and underground; however the impacts of this connection on the PRoW network would still need to be considered. This element of the project has the potential to cause severe disruption to the PRoW network and path users during the construction phase of the project. KCC requests that the applicant will need to consider the potential effects of the project on the PRoW network and its users, by assessing the noise, air quality, drainage and visual impacts. Moreover, PRoW users should be considered when identifying the sensitivity receptors.

During the pre-construction phase, excavation works may be required to evaluate ground conditions. The results of these investigations may influence and determine the final design of the project, but the process of collecting the data may cause disruption to PRoW network. Consequently, KCC requests that consideration be given to the impacts on the PRoW network during the pre-construction design stage of the project, in addition to the construction and operational phases.

In order to monitor path use before, during and after the construction phase of the project, it is requested that people counters are installed on PRoW network at key

gateway locations. Data obtained from these counters can be used to assess the impact of the project. KCC recommends that electronic people counter sensors are installed (instead of manual surveys) as these counters will be able to operate 24 hours a day and capture sporadic path users.

Temporary path closures may be required during the construction phase so that engineering works can be completed safely. KCC recommends path closures are minimised and popular routes are kept open where possible. Where temporary closures are required, convenient diversion routes should be provided to reduce disruption to path users. Robust information boards explaining temporary access restrictions should be considered for paths that will be closed for long periods. The KCC PRoW & Access Service would be happy to discuss the process for temporarily closing paths with the applicant.

Path extinguishments and long term severance of routes should be avoided, in order to prevent fragmentation of the PRoW network. Important access links between residential neighbourhoods, industrial employment areas, community facilities and open green space for outdoor recreation, should be preserved.

The County Council is currently working in partnership with Natural England to establish the England Coast Path. This is a new national trail walking route that will eventually circumnavigate the entire English coastline. These Coastal Access rights are likely to be in effect during the construction phase of this project, as the Coast Path is scheduled for completion by 2020.

The intention is to align the trail alongside the River Thames but the Coast Path may have to be aligned further inland towards Dartford as there is no pedestrian crossing infrastructure at the mouth of the River Darent. The applicant should therefore engage with Natural England (who is leading on the development of the England Coast Path) and consider the impacts on the new national trail.

The KCC PRoW & Access Service would welcome future engagement with the applicant to discuss the potential impacts and consider appropriate mitigation to ensure that the PRoW network is not adversely affected by the development.

7.6 Historic Environment

Only part of the development is within the KCC boundary and therefore the comments below relate to the associated impacts in this area.

In reference to paragraph 7.6.2 (p43), KCC recommends a review of the Kent Historic Environment Record (HER) to ensure all of the most up to date fieldwork assessments are considered. The Littlebrook Power Station site has been subject to several phases of fieldwork by Museum of London Archaeology.

KCC considers the suggested sources of data list in paragraph 7.6.7 (p44) for the Desk Based Assessment (DBA) are too limited. The Kent HER must be consulted, as well as recent geotechnical reports for nearby development schemes in Kent. There also needs to be a detailed review of early OS maps and documentary accounts, LiDAR, aerial photographs and any other geophysical surveys nearby.

The proposed method to undertake an archaeological DBA and a separate geo-archaeological Statement is welcomed. However, the geo-archaeological issues may be of greater significance and KCC requests a full geo-archaeological DBA is undertaken, including advice from relevant specialists. There have been several phases of geo-archaeological work undertaken within this area and all of these will need to be referenced with clear assessment of the potential impact of the proposed development.

The geo-archaeological assessment will need to include baseline geological data, topographical data and review and consideration of geotechnical and geophysical work. The reporting needs to provide a Deposit Model clearly showing the predicted deposits of archaeological interest based on a robust assessment of existing data and the proposed impact of the development. KCC recommends that any geotechnical fieldwork undertaken is inclusive of specialist geo-archaeological fieldwork. The results of the geo-archaeological assessment of geotechnical surveys will also hopefully be incorporated into the main geo-archaeological assessment. The results should also be clearly demonstrated in the Deposit Model.

The Heritage Assessment would need to include consideration of historic landscapes as KCC considers it insufficient to refer historic landscape issues in the Townscape and Visual Impact Assessment (TVIA) section. Although much of the development seems to be within the built environment, there are Kent HER suggestions of former historic landscape features and the study of early OS maps suggests there is potential for historic footpaths, banks and ditches to be encountered, as well as possible Bronze Age barrows and Anglo-Saxon boundary banks. As such, KCC recommends the need for a Historic Landscape Assessment to be completed and it should be incorporated into the Historic Environment section and not the TVIA section.

7.7 Terrestrial Biodiversity

As the majority of the proposed development is outside of KCC's boundary, comments are provided for the part of ECR Option Two at the Littlebrook Power Station. Currently, the Scoping Report focuses on the surveys that are to be carried out within the London Borough of Bexley boundary and there is no reference to the potential impacts in and around the Littlebrook Power Station site, should this connection point be chosen.

The range of surveys that have been listed within the report are comparable to the surveys that may have to be completed at Littlebrook Power Station site. KCC has previously commented on a Scoping Opinion for the Littlebrook Power Station site, in which surveys carried out on the site have identified the following:

- A population of reptiles was found in different areas of the development site;
- A small population of water voles was recorded in Little Powder Creek, which runs adjacent to the site to the west;
- Three Schedule 1 bird species were present on site: Black Redstart, Peregrine Falcon and Cetti's Warbler (although the Black Redstart and

Peregrine Falcon are likely to be nesting on the buildings which are not in the redline boundary of this application);
- Bat activity transects identified low levels of foraging activity; and
- A good diversity of invertebrates was present on site.

Any proposed construction work at the Littlebrook Power Station site would need to be informed by detailed up to date survey information. Similarly, the connection route between the two sites would have to require, at a minimum, an Ecological Scoping Survey to be carried out, to ensure any ecological impacts associated with that work can be mitigated.

7.10 Hydrology, Flood Risk and Water Resources

Consultation will need to be undertaken with KCC as the Lead Local Flood Authority for the part of ECR Option Two that is located within the boundary of Dartford Borough Council and the applicant will need to give consideration to Dartford Surface Water Management Plan – Stage 2 (Nov 2016)[1].

Within section 7.10 (p65-73) of the Scoping Report, there has been an intensive assessment of the impact upon surface water drainage and water quality for both the construction and operational phases. However, there is no mention of KCC as Lead Local Flood Authority or of the KCC Drainage and Planning Policy Statement (June 2017)[2]. Despite the majority of the site falling with the London, KCC would recommend that reference is made to the Drainage and Planning Policy Statement for consideration of drainage submissions to support the DCO.

As part of the Flood Risk Assessment, any identified flood risk or surface water management issues should be appropriately considered, with appropriate mitigation recommend wherever necessary.

Minerals and Waste

The Scoping Report does not explicitly discuss the mineral and waste impacts of the proposed development; however, the proposed development has significant ramifications for waste management in both London and Kent. KCC understands that the waste input would come entirely from London and that materials, having been sourced, segregated and transported from transfer stations to the Riverside Energy Park (REP) facility, would be used for energy recovery. This is in line with the waste hierarchy requirements, as detailed in the National Planning Policy for Waste 2014 (NPPW).

The County Council regards this as an appropriate way to manage London's waste, provided that the non-organic residual wastes from commercial and industrial and Local Authority Collected Waste streams are incapable of further reuse or recycling.

[1] https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/surface-water-management-plans/dartford-surface-water-management-plan

[2] https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/surface-water-management-plans/dartford-surface-water-management-plan

This does not apply to the organic fractions that are proposed to be recycled via anaerobic digestion technology. The use of photovoltaics, district heating systems and a battery storage component to supplement electrical power to the grid during high peak demand periods are all positive sustainable elements of the proposed development that is supported by the County Council.

The Kent Minerals and Waste Local Plan 2013-30 (KMWLP) was adopted in July 2016. It includes specific sustainable waste management objectives (Policy CSW1: Sustainable Development) and the strategy for waste management in Kent is to ensure sufficient capacity for Kent to maintain net self-sufficiency in managing waste arisings and includes some residual non-hazardous waste from London (Policy CSW 4: Strategy for Waste Management Capacity).

The proposed REP would make a positive contribution to ensuring that more of London's waste is managed within London; enabling Kent's waste management capacity to address Kent's needs to help achieve net self-sufficiency over the plan period. Furthermore, the proposal is entirely in line with similar objectives of the London Plan to attain net self-sufficiency in waste management (Policy 5.16 p206), as well as the emerging London Plan (Policy S18, p347).

KCC is responsible for safeguarding all the economic minerals within Kent, to prevent them from being sterilised by other forms of development. The ECR Option Two passes through a Mineral Safeguarding Area (MSA) as defined in the KMWLP. The economic mineral deposits in this MSA are the Sub-Alluvial River Terrace Deposits and River Terrace Deposits. The DCO application will need to include a Minerals Assessment to address the safeguarding issue and demonstrate compliance with Policy DM 7 of the KMWLP. This policy sets out criteria that may be appropriate to justify an exemption from the KMWLP's presumption to safeguard important economic mineral resources.

The Minerals and Waste Planning Policy Team would be happy to discuss any mineral and waste issue further on 03000 413376 or mwlp@kent.gov.uk.

KCC would welcome further opportunities to engage throughout the progression of the DCO. If you require further information or clarification on any matter in this letter, then please do not hesitate to contact KCC.

Yours sincerely,

Katie Stewart
Director for Environment, Planning and Enforcement

Development Management
Civic Offices
2 Watling Street, Bexleyheath, Kent, DA6 7AT
Tel: 020 8303 7777 Fax: 0203 045 5817
DX31807 Bexleyheath www.bexley.gov.uk

m/r 17/02902/ALA
y/r EN010093-000004

Tel 020 3045 5771
date 29th November 2017

The person dealing with this matter is Mr M Watling
(e-mail- Mark.Watling@bexley.gov.uk)

Cory Riverside Energy
C/o The Planning Inspectorate
Contact: Hannah Pratt,
3D Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACTS
Riverside Energy Park, Belvedere (The Planning Inspectorate, Bristol)
Application by Cory Environmental Holdings Limited for an Order granting development consent for the Riverside Energy Park for the Secretary of State's opinion as to the information to be provided in an Environmental Statement relating to the proposed development.

I acknowledge receipt of your details received on 28th November 2017 requesting observations on the above proposal.

I would advise you that I am undertaking a consultation exercise regarding this proposal and I will endeavour to reply within the specified period. For your information the application was recorded in our records under reference 17/02902/ALA.

Please contact my assistant on the above telephone number if you have any queries.

Yours faithfully

[redacted]

Head of Development Management

From:	Landsearches
To:	Riverside Energy Park; Landsearches
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	28 November 2017 13:56:52
Importance:	High

Good Afternoon

We have forwarded your email as per below, we received this morning to our Planning Department.

Please send future emails and correspondents to planning@havering.gov.uk

Kind Regards

Janet Commons | Local Land Charges Assistant
London Borough of Havering | Local Land Charges
Town Hall, Main Road, Romford, RM1 3BD

t 01708 432474
e janet.commons@havering.gov.uk

www.havering.gov.uk

Clean | Safe | Proud

Sign up for email updates for local news and information

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:25
To: Landsearches
Subject: Riverside Energy Park - EIA Scoping notification and consultation

FAO: Head of Highways

Dear Sir/Madam

Please see attached correspondence on the proposed Riverside Energy Park.

Please note the deadline for consultation responses is 26 December 2017. This deadline is a statutory requirement that has been triggered by submission of the Applicant's scoping report and cannot be extended.

Kind regards,
Hannah

Hannah Pratt

Senior EIA and Land Rights Advisor
Major Applications and Plans
The Planning Inspectorate, 3D, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Direct Line: 0303 444 5001
Helpline: 0303 444 5000
Email: Hannah.pratt@pins.gsi.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

LONDON FIRE
AND EMERGENCY
PLANNING AUTHORITY

Fire Safety Regulation, South East 4 Team
169 Union Street London SE1 0LL
T 020 8555 1200 x89171

Minicom 020 7960 3629
london-fire.gov.uk

Ms. Hannah. Pratt
Senior EIA and Lands Right Advisor
Major Plans and Applications
The Planning Inspectorate
3D, Temple Quay House
Temple Quay, Bristol
BS1 6PN

London Fire and Emergency Planning Authority runs the London Fire Brigade

Date 14 December 2017
Our Ref 93/177121
Your Ref EN010093-000004

Dear Hannah

FIRE AUTHORITY CONSULTATION

Premises: RIVERSIDE ENERGY FROM WASTE FACILITY, NORMAN ROAD, BELVEDERE, DA17 6JY

With reference to planning application **EN010093-000004**, requesting advice in respect of the above-mentioned premises, please refer to the comments below.

Pump appliance access and water supplies for the fire service were not specifically addressed in the supplied documentation, however they do appear adequate. In other respects this proposal should conform to the requirements of part B5 of Approved Document B.

Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.
If there are any specific fire safety matters about which you are concerned or you have any queries regarding this letter, please contact the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,

for Assistant Commissioner (Fire Safety)
Directorate of Operations
FSR-AdminSupport@london-fire.gov.uk

Reply to Matthew Arnold
Direct **T** 07342026168

The London Fire Brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.

Marine Management Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0)300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

Hannah Pratt
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing, Temple Quay House
2 The Square,
Bristol, BS1 6PN.

[By email only]

Your reference: EN010093-000004
Our reference: DCO/2017/00008

21 December 2017

Dear Ms Pratt,

Formal Scoping Request under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 for the proposed Riverside Energy Park Development.

Thank you for your scoping request on 28 November 2017 and for providing the Marine Management Organisation (the "MMO") with the opportunity to comment on the Riverside Energy Park scoping request.

Please find attached the scoping opinion of the MMO. In providing these comments, the MMO has sought the views of our technical advisors at the Centre for Environment, Fisheries and Aquaculture Science (Cefas) and the MMO's Coastal Office (Eastern Area).

In providing our advice the MMO has reviewed the following chapters/sections:
2 – Proposed Development
3 – The Site and the Surrounding Area
7.8 – Marine Biodiversity
7.9 – Marine Geomorphology

If you require any further information, please do not hesitate to contact me using the details provided below.

Yours sincerely,

[redacted]

Jamie Short
Marine Licensing Case Officer

D +44 (0)20822 56469
E jamie.short@marinemanagement.org.uk

Enclosed: MMO Scoping Opinion: Riverside Energy Park Development
Copies to: Tim Fay (MMO), Jamie McPherson (MMO)

The MMO's role in Nationally Significant Infrastructure Projects

The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.

The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence[1]. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.

In the case of Nationally Significant Infrastructure Projects ("NSIPs"), the 2008 Act enables Development Consent Order's ("DCO") for projects which affect the marine environment to include provisions which deem marine licences[2].

As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.

Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("dML") enable the MMO to fulfil these obligations.

Further information on licensable activities can be found on the MMO's website[3]. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note[4].

[1] Under Part 4 of the 2009 Act
[2] Section 149A of the 2008 Act
[3] https://www.gov.uk/planning-development/marine-licences
[4] http://infrastructure.planningportal.gov.uk/wp-content/uploads/2013/04/Advice-note-11-v2.pdf

Scoping Opinion

Title: Riverside Energy Park
Applicant: Cory Riverside Energy
MMO Reference: DCO/2017/00008

Contents

1. Proposal

1.1. Riverside Energy Park (REP) is proposing the development of a new integrated Energy Park, located in Belvedere in the London Borough of Bexley. This will be known as 'Riverside Energy Park', and would be sited adjacent to an existing Energy Recovery Facility.

1.2. The site will combine a waste Energy Recovery Facility, battery storage, a roof-mounted solar photovoltaic installation, an anaerobic digestion facility and provision for CHP readiness. A new connection to the existing electricity network will be required. The marine elements of the Riverside Energy Park proposal include:

- Dredging to ensure sufficient vessel access
- Installation of a temporary causeway across the intertidal zone, where self-propelled multi-axle trailers would roll the construction modules off a barge
- Use of a lift crane, located on either a jetty constructed in the river or near the river bank.

2. Scoping Opinion

2.1. Pursuant of Regulations 10 and 11 of the Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the Regulations"), the Planning Inspectorate have requested a Scoping Opinion from the MMO. Scoping Report entitled *"Lower Thames Crossing, Scheme Number HE540039, Environmental Impact Assessment Scoping Report"* has been submitted to the MMO for review.

2.2. The MMO broadly agrees with the topics outlined in the Scoping Report and, in addition, we outline that the following aspects be considered further during the Environmental Impact Assessment (EIA) and must be included in any resulting Environmental Statement (ES).

3. Habitats Directive / Wild Birds Directive / Nature Conservation

3.1. Thames Estuary and Marshes Special Protection Area (SPA) - Although the MMO agrees that the distance between the planned worksite and this designated site is great enough (approximately 20km) that it can be screened out (and no other identified pathways to the designated site), we defer comment on this matter to Natural England.

3.2. Thames Estuary and Marshes Ramsar - Although MMO agree that the distance between the planned worksite and this designated site is great enough that it can be screened out, we defer comment on this matter to Natural England.

3.3. Inner Thames Marshes Site of Special Scientific Interest (SSSI) - The MMO welcomes the inclusion of this designated site in the scoping report and recommend that it is screened in unless sufficient evidence determines it can be screened out.

3.4. Thames Estuary recommended Marine Conservation Zone (rMCZ) - The MMO welcome the inclusion of this designated site in the scoping report and welcome that it is screened in unless sufficient evidence determines it can be screened out.

4. Marine Processes

4.1. The MMO notes that the possible effects of vessel wash should be considered where relevant as part of any future EIA.

4.2. Table 7.9.2 indicates that 'Changes to the wave climate' have been scoped out of the assessment. The MMO considers this reasonable, since the incident waves themselves will not be altered by the works.

4.3. Since the works described include either a jetty or a causeway, which would generate a wave shadow, the MMO would expect to see some consideration of wave impacts on the intertidal sediments as part of the EIA. The works have potential to alter local patterns of erosion or accretion around the structure.

4.4. The MMO notes that the document does not discuss the methods for identifying, gathering and analysing the additional data which will be required for the intended EIA. This will be required as part of the ES.

5. Benthic Ecology

5.1. The MMO notes that not all relevant impacts on benthic ecology have been scoped. The remobilisation of contaminated sediment due to the marine works has not been considered as a potential impact. If the marine works undertaken within the intertidal/subtidal include any dredging during high tide, then this impact must be scoped in.

5.2. Although justification has been provided where impacts have been scoped out, no detail on the construction of the causeway or jetty has been supplied. The MMO expects this to be included in any future ES.

5.3. The MMO considers the approach of the scoping assessment and data gathering methods (a dedicated grab survey along with a Phase 1 Intertidal habitat survey) to be appropriate.

5.4. The MMO can only provide comments on the limited information provided, taking into account that details on the construction proposed within the intertidal and subtidal areas have not been finalised, therefore we may have further comments to add as the proposals and supporting assessments develop.

6. Fish and Shellfish Ecology and Fisheries

6.1. The MMO notes that the scoping report correctly recognises that the Thames Estuary supports a diverse range of fish fauna including known spawning and nursery

grounds for herring, lemon sole, and Dover sole. Commercially important fish species are also identified as utilising the Thames Estuary for nursery areas including plaice, sprat and seabass. Further, conservation and migratory species such as short-snouted seahorse, long-snouted seahorse, European eel, European smelt, sea lamprey, Atlantic salmon, river lamprey and the twaite shad are also mentioned as species which inhabit and use the Thames Estuary.

6.2. The MMO considers the potential impacts on fish receptors from construction identified within the scoping report to be appropriate.

6.3. The MMO expects any EIA to consider seabass in the context of the special measures in place i.e. are any construction activities (such as piling and dredging) likely to disturb nursery grounds or juvenile fish.

6.4. The MMO advises that the effects of underwater noise and vibration on herring to be assessed appropriately in the EIA, due to the current state of the Thames herring stock.

6.5. The MMO recommends that the potential effects of the proposed development on sole are assessed, given that the Thames Estuary is a high intensity spawning and nursery ground for the species.

6.6. Thornback ray are one of the four main species Thames fisherman target and are included on the on the OSPAR List of threatened and/or declining species and habitats (OSPAR Agreement 2008-6) for OSPAR region II (Greater North Sea). Given the importance of the species in the Thames estuary, the MMO recommends that they are assessed in the EIA.

6.7. The project details in respect to marine construction, noise generating activities and potential cumulative effects are limited (which is to be expected at this scoping stage). Therefore, MMO recommends that the impacts detailed in Table 7.8.1 of the scoping report relating to fish receptors are not scoped out at this stage, and are instead taken forward for consideration.

6.8. The MMO recommends that noise disturbance as a result of vessel movements during the marine works, temporary habitat loss and change as a result of marine infrastructure, and light disturbance as well as remobilising contaminated sediment are also scoped in and considered in the EIA.

6.9. The scoping report has identified cockles (*Cerastoderma edule*), oysters (*Ostrea edulis*) and mussels (*Mytilus edulis*) as being present throughout the outer estuary, though MMO advises noise during the construction phase is unlikely to have an adverse impact. Dredging activity is mentioned as a possible method to ensure vessels can access the site throughout the tidal cycles during construction – sedimentation may therefore occur, though due to the oceanographic nature of the estuary and proximity of the shellfish, the MMO suggests this is unlikely to result in a significant impact.

6.10. The MMO note that although Cefas spawning maps (Coull et al., 1998 and Ellis et al., 2012) do not extend as far upstream as Belvedere, they may provide useful

information for the EIA, especially as the lower Thames estuary is important as a spawning and nursery ground for sole, seabass and herring. The Cefas young fish survey (http://data.cefas.co.uk/#/Search/1/YFS) provided indices of abundance of small demersal fish for several areas around the UK coastline including the Thames Estuary. The survey particularly targeted juvenile 0-group and 1-group plaice and sole, prior to their recruitment to the fishery and the survey time series concluded in 2010. This may provide useful information for juvenile fish in the vicinity of the proposed development. The historic survey series data is reviewed in both Rogers et al., (1998) and within a research project that analysed the data and produced a report in 2011; 'Trends in the inshore marine community of the east and south UK coast: 1970s to present'. The final report can be downloaded from http://randd.defra.gov.uk/Document.aspx?Document=MF1107_sid5_210611_final.pdf and project information and relative abundance maps are available from http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=16741

6.11. The MMO note that The Cefas young fish survey (http://data.cefas.co.uk/#/Search/1/YFS) provided indices of abundance of small demersal fish for several areas around the UK coastline including the Thames Estuary. The survey particularly targeted juvenile 0-group and 1-group plaice and sole, prior to their recruitment to the fishery and the survey time series concluded in 2010. This may provide useful information for juvenile fish in the vicinity of the proposed development. The historic survey series data is reviewed in both Rogers et al., (1998) and within a research project that analysed the data and produced a report in 2011; 'Trends in the inshore marine community of the east and south UK coast: 1970s to present'. The final report can be downloaded from http://randd.defra.gov.uk/Document.aspx?Document=MF1107_sid5_210611_final.pdf and project information and relative abundance maps are available from http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=16741

6.12. The MMO note that The Fish Atlas of the Celtic Sea, North Sea and Baltic Sea (Heessen et al., 2015) provides an overview of 40 years of information collected from internationally coordinated and national surveys to present data and information on the recent distribution and biology of demersal and small pelagic fish in these ecoregions. It may provide the applicant with a useful resource of information on fish receptors in the wider Thames estuary.

7. Noise and Vibration

7.1. The scoping report states (section 7.8.27) that 'with specific respect to the noise assessment, a logarithmic spreading model will be used to predict the propagation of sound pressure with range from any marine piling. This model is represented by a logarithmic equation and will incorporate factors for noise attenuation and absorption losses based on empirical data from coastal environments. This model has been advocated by the UK regulators in a number of EIAs for recent coastal developments. The application of this model is therefore considered appropriate for this study'. Further, 'a range of available published criteria will be used to assess the potential physiological and behavioural effects of underwater noise on marine mammals, fish

and shellfish (namely Southall et al. 2007; Hawkins et al. 2014; Popper et al. 2014; National Oceanic and Atmospheric Administration (NOAA), 2016;). Unpublished criteria, namely dBht (species) proposed by Nedwell et al. (2007), will also be used to provide context as this metric has been used in numerous past EIAs'. MMO support the use of these studies, and would encourage early engagement in order to ensure that any modelling undertaken is both appropriate and fit for purpose.

7.2. The MMO recommends that while information regarding marine construction works is very limited at this early stage (and therefore potential impacts of underwater noise on marine receptors are not fully explored), the potential impacts on fish, marine mammals, benthic species and shellfish must be taken forward for consideration, and not scoped out.

8. Seascape/Landscape

8.1. The MMO welcomes the inclusion of any Area of Outstanding Natural Beauty (AONB) in the assessment but would defer comment on this matter to Natural England.

9. Archaeology/Cultural Heritage

9.1. The MMO welcomes the inclusion of any heritage features in the assessment but would defer comment on this matter to Historic England.

10. Navigation/Other Users of the Sea

10.1. The MMO advises that impacts to navigation and other users of the sea are considered in the ES and a navigational risk assessment produced to inform final assessments.

11. Cumulative Impacts & In-Combination Impacts

11.1. The MMO advises that a robust assessment of the cumulative and in-combination impacts in all chapters to be considered.

12. Mitigation

14.1 Although the scoping report does consider some mitigation, for example "soft start procedures for marine piling and for employing seasonal restrictions on the marine works", once the potential impacts are better understood then more appropriate mitigation can be considered and implemented. Should any mitigation be identified during the assessment and reporting, then this should be fully detailed and considered within the ES.

13. General Comments

15.1 The MMO support the approach to scope aspects in until such a time where they can be scoped out of further assessment.

15.2 The MMO welcomes further consultation prior to anything within its remit being scoped out of further assessment.

15.3 Sensitive marine receptors that are not taken forward for assessment should be fully justified and supported in the report.

14. Conclusion

14.1. The topics highlighted in this scoping opinion should be assessed during the EIA process and the outcome of these assessments must be documented in the ES in support of the application for a Development Consent Order. This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given the scale and program of these planned works, other work may prove necessary, especially as detailed design is further defined.

From:	Helen Croxson
To:	Riverside Energy Park
Cc:	Stephen Vanstone; Trevor Harris; David Turner
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	20 December 2017 13:58:20

Dear Hannah,

Thank you for your letter dated 28th November 2017 regarding the proposed Riverside Energy Park (REP).

We note that In order to facilitate construction of the REP, temporary works in the River Thames may be required, and that the developers are currently exploring the options for this element of the project. Full details of the works to be carried out in the River Thames will need to be provided and we would expect subject to a Marine Licence from the Marine Management Organisation (MMO). The MCA is a statutory consultee to the MMO and will consider the impact the proposed works may have on the marine environment at that stage.

In addition, we note that these proposed marine works are likely to fall within the jurisdiction of the Port of London Authority (PLA) so thorough consultation will need to take place with the PLA and applications made for any port licences they may require. We would also like to point developers in the direction of the Port Marine Safety Code (PMSC). They will need to liaise and consult with the PLA to develop a robust Safety Management System (SMS) for the project under this code. The sections that we feel cover Navigational safety under the PMSC and its Guide to Good Practice are as follows:

From the Guide to Good Practice, section 7 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port, and a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 7.7 Regulating harbour works covers this in more detail and have copied the extract below from the Guide to Good Practice.

7.7 Regulating harbour works

7.7.1 Some harbour authorities have the powers to license works where they extend below the high watermark, and are thus liable to have an effect on navigation. Such powers do not, however, usually extend to developments on the foreshore.

7.7.2 Some harbour authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, harbour authorities should be alert to developments on shore that could adversely affect the safety of navigation. Where necessary, consideration should be given to requiring the planning applicants to conduct a risk assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:

- high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation;
- high constructions, which potentially affect wind patterns; and
- lighting of a shore development in such a manner that the night vision of

mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.

There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways.

Finally, we would expect a full Navigation Risk Assessment to be carried out as part of the Environmental Statement, covering the construction, operation and decommissioning of the associated works in the marine environment, detailing the expected impact on the safety of navigation and appropriate supporting risk mitigation measures.

Kind regards

Helen

Helen Croxson
Acting OREI Advisor
Maritime and Coastguard Agency
Bay 2/25 Spring Place
105 Commercial Road
Southampton
SO15 1EG

Tel: 0203 8172426
Mobile: 07468353062
Email: Helen.Croxson@mcga.gov.uk

Please note I currently work Tuesdays, Wednesdays and Thursdays.

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:18
To: 'NSIP.applications@hse.gov.uk' <NSIP.applications@hse.gov.uk>; 'barkdag.bdccg2@nhs.net' <barkdag.bdccg2@nhs.net>; 'GRECCG.NHSGreenwichCCG@nhs.net' <GRECCG.NHSGreenwichCCG@nhs.net>; 'bexccg.contactus@nhs.net' <bexccg.contactus@nhs.net>; 'dgs.ccg@nhs.net' <dgs.ccg@nhs.net>; 'consultations@naturalengland.org.uk' <consultations@naturalengland.org.uk>; 'info@london-fire.gov.uk' <info@london-fire.gov.uk>; 'enquiries@kent.fire-uk.org' <enquiries@kent.fire-uk.org>; 'enquiries@mopac.london.gov.uk' <enquiries@mopac.london.gov.uk>; 'contactyourpcc@pcc.kent.pnn.police.uk' <contactyourpcc@pcc.kent.pnn.police.uk>; Helen Croxson <Helen.Croxson@mcga.gov.uk>; 'marine.consents@marinemanagement.org.uk' <marine.consents@marinemanagement.org.uk>; 'airspace@caa.co.uk' <airspace@caa.co.uk>; 'planningSE@highwaysengland.co.uk' <planningSE@highwaysengland.co.uk>; 'boroughplanning@tfl.gov.uk' <boroughplanning@tfl.gov.uk>; 'NSIPconsultations@PHE.gov.uk' <NSIPconsultations@PHE.gov.uk>; 'offshoreNSIP@thecrownestate.co.uk' <offshoreNSIP@thecrownestate.co.uk>; 'DIO-Safeguarding-Statutory@mod.uk' <DIO-Safeguarding-Statutory@mod.uk>; 'dgs.ccg@nhs.net' <dgs.ccg@nhs.net>; 'ped@londonambulance.nhs.uk' <ped@londonambulance.nhs.uk>; 'enquiries@secamb.nhs.uk' <enquiries@secamb.nhs.uk>; 'TownPlanningSE@networkrail.co.uk' <TownPlanningSE@networkrail.co.uk>;

Please ask for: Doug Coleman
Tel: 01634 331587
Our Ref: MC/17/4113
Date: 1 December, 2017

H Pratt
Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Planning Service
Physical & Cultural Regeneration
Regeneration, Culture, Environment & Transformation
Civic Headquarters
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR
Telephone: 01634 331700
Facsimile: 01634 331195
Email: planning.representations@medway.gov.uk

Dear H Pratt,

TOWN AND COUNTRY PLANNING ACT 1990
The Town and Country Planning (General Management Procedure) (England) Order 2015

APPLICATION NUMBER: MC/17/4113
LOCATION: RIVERSIDE ENERGY PARK BELVEDERE LONDON
PROPOSAL: Consultation from the Planning Inspectorate in relation to an environmental impact scoping report for Riverside Energy Park

Thank you for your consultation letter which was received on 28 November, 2017. I will endeavour to ensure that you receive this Council's comments as soon as is practicable. If for any reason a formal response cannot be made within 21 days of receipt of details, the Case Officer, as advised above, will contact you within that period.

If you wish to enquire about the progress of your application please visit our website http://publicaccess.medway.gov.uk/online-applications/

. All documents and plans relating to this application will be published on the above website. You can also phone the Planning Customer Contact Team on 01634 331700
.

Yours sincerely

Doug Coleman
Planning Officer

This letter is available in larger print size if required. For details please contact Lisa Maryott on 01634 331102

Ministry of Defence

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore

Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel: +44 (0)121 311 3818 **Tel (MOD):** 94421 3818
Fax: +44 (0)121 311 2218
E-mail: DIO-safeguarding-statutory@mod.uk
www.mod.uk/DIO

21 December 2017

Hannah Pratt
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your reference: EN010093-000004
Our reference: 10042133

Dear Hannah

MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)

Proposal:	Application by Cory Environmental Holdings Limited for an Order granting Development Consent for the Riverside Energy Park (the Proposed Development)
Location:	Riverside Resource Recovery Ltd, Norman Road North, Belvedere DA17 6JY
Grid Ref:	549932, 180622

Thank you for consulting Defence Infrastructure Organisation (DIO) on the above proposed development. This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal.

I trust this adequately explains our position on this matter.

Yours sincerely

[redacted]

Debbie Baker

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Sent electronically to:

RiversideEP@pins.gsi.gov.uk

Nick Dexter
DCO Liaison Officer
Land & Business Support

Nicholas.dexter@nationalgrid.com
Tel: +44 (0)7917 791925

www.nationalgrid.com

18th December 2017

Dear Sir / Madam,

Ref: EN010093 - Riverside Energy Park - EIA Scoping notification and consultation

I refer to your letter dated 28th November 2017 in relation to the above proposed application for a Development Consent Order. Having reviewed the Scoping Report, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has high voltage electricity overhead transmission lines, substation and underground cables within or in close proximity to the proposed order limits. The overhead lines, substation and underground cables form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are shown below:

Overhead Lines

- ZR (400kV) overhead line route
- VN (275kV) overhead line route
- YL (400kV) overhead line route
- ZB (400kV) overhead line route

Substations

- Barking 1C 132kV Substation
- Barking 1G 132kV Substation
- Littlebrook 400kV Substation

Underground cables

There are numerous high voltage underground cables within or in close proximity to the proposed order limits

Please find enclosed a plan showing the location of National Grid's electricity assets.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Gas Transmission

National Grid Gas has no high pressure gas transmission pipelines located within or in close proximity to the proposed order limits.

Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004).
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above
- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

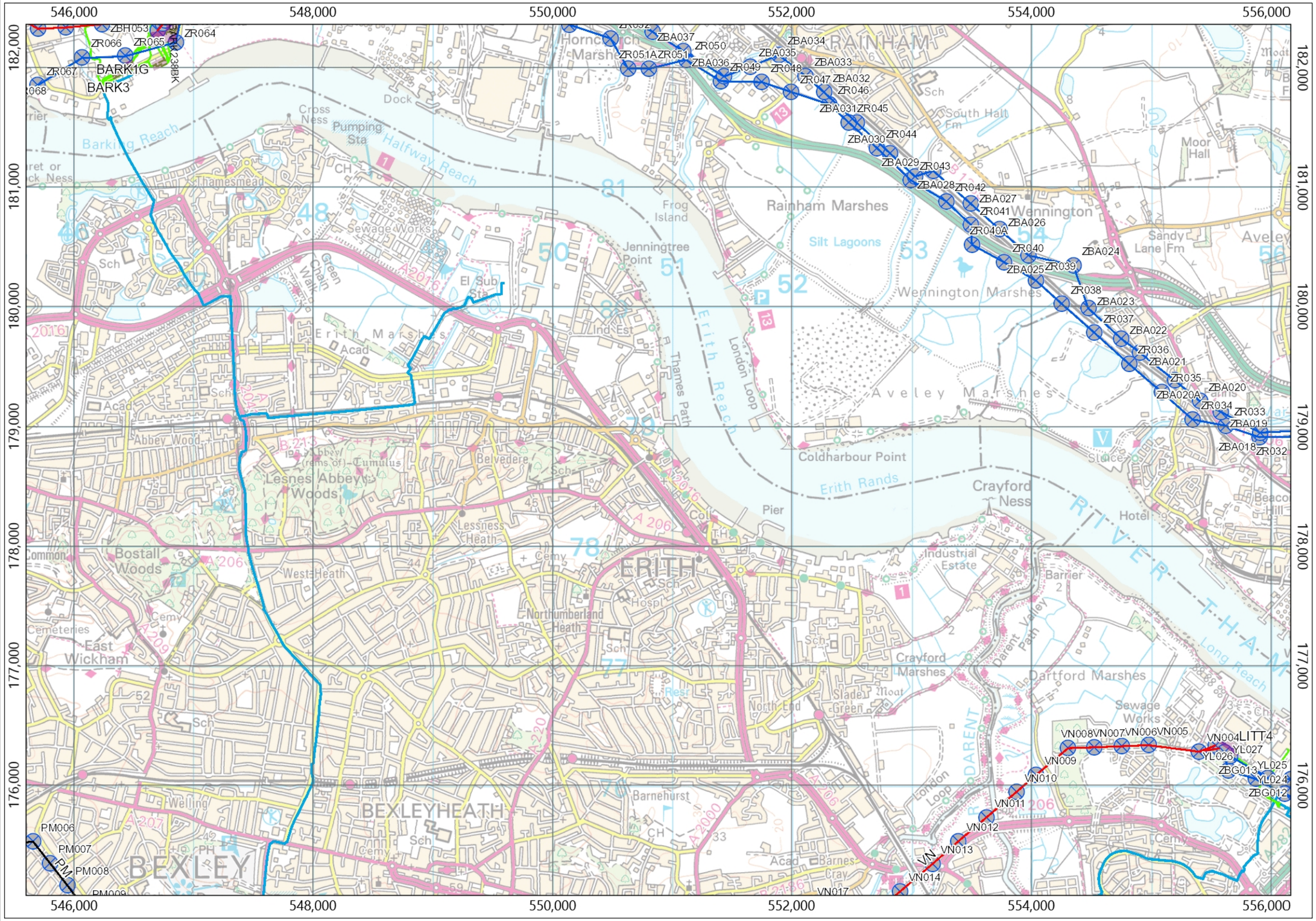
The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours Faithfully

[redacted]

Nick Dexter.

nationalgrid | Map Title



Legend:

- Substations Commissioned
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Gas Operational Boundary
- Gas Site Boundary
- Block Valve
- Compressor
- LNG Site
- Multijunction
- Minimum Offtake
- Future Minimum Offtake
- Offtake
- Pressure Reduction Installation
- Pig Trap
- Terminal
- Transferred Offtake
- Aerial Marker Post
- CP Test Post
- Transformer Rectifier
- Gas Pipe Feeder
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- SRP Sightings - Open
- SRP Sightings - Closed
- Eagles Enquiries - Open
- Eagles Enquiries - Closed

Notes:

0 — 0.78 — 1.6 Kilometers

Date: 18/12/2017
Time: 11:29:38

Page size: A3 Landscape
Print by: **Dexter, Nicholas**

Scale: 1: 30,863

N

From:	NATS Safeguarding
To:	Riverside Energy Park
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation (Our Ref: SG25495)
Date:	28 November 2017 15:24:09
Attachments:	image001.png image002.png image003.png image004.gif image005.png image006.png image007.png

---

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

NATS Safeguarding

D: 01489 444687
E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:18
To: 'NSIP.applications@hse.gov.uk'; 'barkdag.bdccg2@nhs.net'; 'GRECCG.NHSGreenwichCCG@nhs.net'; 'bexccg.contactus@nhs.net'; 'dgs.ccg@nhs.net'; 'consultations@naturalengland.org.uk'; 'info@london-fire.gov.uk'; 'enquiries@kent.fire-uk.org'; 'enquiries@mopac.london.gov.uk'; 'contactyourpcc@pcc.kent.pnn.police.uk'; 'Helen.Croxson@mcga.gov.uk'; 'marine.consents@marinemanagement.org.uk'; 'airspace@caa.co.uk'; 'planningSE@highwaysengland.co.uk'; 'boroughplanning@tfl.gov.uk'; 'NSIPconsultations@PHE.gov.uk'; 'offshoreNSIP@thecrownestate.co.uk'; 'DIO-Safeguarding-Statutory@mod.uk'; 'dgs.ccg@nhs.net'; 'ped@londonambulance.nhs.uk'; 'enquiries@secamb.nhs.uk'; 'TownPlanningSE@networkrail.co.uk'; 'hreenquiries@highwaysengland.co.uk'; 'pressoffice@pla.co.uk'; NATS Safeguarding; 'mail@homesandcommunities.co.uk'; 'developmentenquiries@nwl.co.uk'; 'southernwaterplanning@atkinsglobal.com'; 'vicky.stirling@cadentgas.com'; 'alans@espipelines.com'; 'FPLPlant@fulcrum.co.uk'; 'box.landandacquisitions@nationalgrid.com'; 'customer@sgn.co.uk'; 'enquiries@wwutilities.co.uk'; 'enquiries@g2energy.co.uk'; 'assetrecords@utilityassets.co.uk'; 'paul.watling@london.gov.uk'
Subject: Riverside Energy Park - EIA Scoping notification and consultation

---

Dear Sir/Madam

Please see attached correspondence on the proposed Riverside Energy Park.

Please note the deadline for consultation responses is 26 December 2017. This deadline is a statutory requirement that has been triggered by submission of the Applicant's scoping report and cannot be extended.

Kind regards,
Hannah

Hannah Pratt
Senior EIA and Land Rights Advisor
Major Applications and Plans
The Planning Inspectorate, 3D, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Direct Line: 0303 444 5001
Helpline: 0303 444 5000
Email: Hannah.pratt@pins.gsi.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

Date: 21 December 2017
Our ref: 232914
Your ref: EN010093-000004

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Hannah Pratt
The Planning Inspectorate
3D, Temple Quay House
Temple Quay
Bristol
BS1 6PN
BY EMAIL ONLY

Dear Hannah Pratt

Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): NSIP EIA scoping Application by Cory Environmental Holdings Limited for an Order granting Development Consent for the Riverside Energy Park.
Location: Norman Road, Belvedere, London DA17 6JY

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 28 November 2017 which we received on 01 December 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's specific advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Zhinlap Tamang on 07825 902051. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Zhinlap Tamang
Thames Team
Sustainable Development
Natural England

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible

SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)
The development site is within 2000m of the following designated nature conservation site:

- Inner Thames Marshes SSSI

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within this and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- Natura 2000 network site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

2.3 Regionally and Locally Important Sites
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

Contact Details: Crossness Nature Reserve Team
Email: karen.sutton@thameswater.co.uk
Nature Reserve Manager: 07747 643958

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance

by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

Our records indicate that Lapwing, *Vanellus Vanellus*, is found in the area and should be included in any assessments.

2.5 Habitats and Species of Principal Importance
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

Our records indicate that there are is a Priority Habitat area on your development site. Priority Habitat – Deciduous woodland, Priority Habitat – Coastal Saltmarsh and Mudflats. These areas should be conserved and enhanced as part of the green infrastructure of the development in line with the NPPF para 117. Building construction should be restricted away from woodland wherever possible and negative impacts to these sites should be avoided, mitigated or as a last resort compensated for.

Marine Conservation Zone (MCZ)
The former Thames Estuary rMCZ has now been split into two separate sites; the first (Upper Thames) stretches from Richmond Bridge to Battersea Bridge and the second (Swanscombe) stretches from The Queen Elizabeth II Bridge to Columbia Wharf/Grays respectively. The Upper Thames Estuary rMCZ is proposed as it is an important area for smelt (*Osmerus eperlanus).*

Although the proposed works are not situated within the boundary of either site, smelt are a migratory species found along the whole of the tidal Thames. The most sensitive time for this species is spring; sediment plumes and under water noise have potential to impact smelt.

This information is in draft status only and forms part of our scientific advice on the sites that are under consideration Tranche 3. Defra and the minister will make final decision regarding which sites

and which features will go forward to a public consultation. These sites are not currently a material consideration, but the sites and feature s that put forward to consultation will become a material consideration at that stage.

More information about Defra's commitment to Tranche 3 MCZ designations can be found here https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492784/mcz-update-jan-2016.pdf.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

2.7 Biodiversity Net Gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework there is a requirement to conserve biodiversity and provide a net gain wherever possible. Conserving biodiversity can include protection, restoration or enhancement to a population or habitat as well as the implementation of green infrastructure. The ES should thoroughly assess the impact of the development on biodiversity. Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric[3] and the environment bank biodiversity impact calculator[4].

3. Green Infrastructure

As part of the London Plan the Supplementary Planning Guidance - All London Green Grid has been produced. This gives guidance on the London Plan policy 2.18. The development resides within the Ridgeway Link which forms a green link between Crossness Sewage Treatment Works, Thamesmead and Plumstead; and is a key gateway from the West into the rich network of green open spaces and waterways in Thamesmead and Erith Marshes. As such there will be green infrastructure and green space requirements for the development.

Development provides opportunities to contribute to and enhance biodiversity and the local environment, as outlined in paragraph 109 and 118 of the NPPF. We advise you to consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Examples might include:

- Providing landscaped footpaths through the new development to link into existing rights of way or neighbouring greenspace.
- Creating ponds as part of the SUDS and as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Avoid using non-native invasive plants in landscaping and greenspace plantings
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding vertical gardens/green walls to new buildings.

Please note that the implementation of Green Infrastructure vegetation will provide further mitigation against the effects of greenhouse gases from the development and may help to meet air quality targets. For example, the planting of street trees, along the Electrical Connection route on the northern side of Thames to the existing National Grid substation in option 1, can have multiple

[3] https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.
[4] http://www.environmentbank.com/impact-calculator.php , and http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfkbJlJQ_UN0044Qe6rmiLffxckg

benefits as the Green Infrastructure can act as a carbon sink, an air filter to help reduce pollution, soak up excess water and reduce the urban heat island effect.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing and new public spaces to be more wildlife friendly (e.g. providing aid towards the maintenance of the adjacent local nature reserve, Crossness Nature Reserve, which is part of the Erith Marshes Site of Metropolitan Importance for Nature Conservation)
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

4.1 Rights of Way, Access land, Coastal access and National Trails

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development.

4.3 Heritage Landscape Character

The nearby historical landmark, Crossness Pumping Station, could be considered to have a significant positive effect for the population of London and consideration should be given to the effects the development to it in the EIA.

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 109), which should be demonstrated through the ES.

Consider the potential impacts of climate change on the development. How will the development protect against heat islands, more severe storms, drought, lack of frosts (that kill of pest and

disease), floods, etc. Consideration should be given to funding mechanisms for green infrastructure maintenance in a changing climate.

7. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Natural England's pre-application Discretionary Advice Service (DAS)

Natural England has identified that this proposal may be suitable from benefitting from our pre-application advice service due to the proximity to designated sites of nature conservation, the potential for green infrastructure gains and potential for biodiversity enhancements. Through early engagement with Natural England customers will receive high-level customer service to support an efficient planning application process and achieve development which is more sustainable. Through accessing our service customers will receive:

- Initial scoping advice on every case at no charge (unless already provided).
- The opportunity to access continued advice around our statutory conservation issues on a charged basis.
- Agreed timescales for responding to customer needs.
- An assigned local Natural England consultant for all pre-application advice.

We will contact the applicant in due course to provide more details of this service, however the first step is to fill out a simple 'Request Form' and email it to consultations@naturalengland.org.uk so we can register interest and assign a local Natural England consultant.

If there are European Protected Species on site, Natural England offers a separate Pre-submission Screening Service (PPS) for planning proposals that will require a mitigation licence. More about this service can be found here.

Please note that our pre-application advice is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course.

From:	Michael Atkins
To:	Riverside Energy Park
Cc:	James Trimmer; Helena Payne
Subject:	Port of London Authority Response: Riverside Energy Park EIA Scoping Report Consultation. Ref: EN010093-000004
Date:	22 December 2017 11:05:30
Attachments:	image001.png image002.png

FAO: Hannah Pratt

Dear Hannah

Thank you for your letter dated 28th November 2017 inviting the Port of London Authority (PLA) to comment on the information that it considers should be provided in the Environmental Statement for the Riverside Energy Park proposal at Belvedere, Bexley.

For information, The PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement's and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLAs functions also include for promotion of the use of the river as an important strategic transport corridor to London.

Site location:

- The PLA note that the redline boundary for the proposed development is very broad at this stage, extending across the River Thames to the borough boundary line between the London Boroughs of Bexley and Barking & Dagenham. It will need to be made clear as the scheme develops the extent of the actual works affecting the Thames and how far into the Thames the proposed temporary works will encroach.

General Points:

- The PLA note that the electrical connection option proposed from Barking & Dagenham to the proposed energy park is via an existing cable tunnel and therefore has no comments regarding either electrical connection proposal.

- It is noted that the development site has a current river works license, for the works and use of the Safeguarded Middleton Wharf. It will be important for discussions to be held between the PLA and the applicant at an early stage regarding any amendments to the river works license (including dredging) and its incorporation as part of the DCO process.

- The PLA in general welcome the proposal which is looking to make greater use of the River Thames for the transportation of waste, as well as the use of the river during the construction phase of the proposed development. The Environmental Statement will need to demonstrate how the use of the river for the transportation of construction and waste materials is to be maximised in line with planning policy. It will also need to be made clear as the scheme develops any impacts as a result of the increased river traffic, particularly in central London once the facility is operational.

- It is noted in the scoping report that the Thames Path is mentioned in the description of the surrounding area, and that both construction options require provision to lift construction

modules over the flood defence wall and the Thames Path. As the scheme develops it will need to be made clear the interaction of the Thames Path with the development, and any periods in which the path may need to be closed during the construction phase.

Specific Comments

Section 2 Proposed Development:

- Paragraph 2.1.10:
  The proposed solar panels must be orientated to ensure they do not create strong reflections/glare over the River Thames.

- Paragraph 2.2.3 & 2.2.4:

The interaction with the temporary and permanent works are critical to how the PLA would be content going forward. The options around the temporary construction works must be progressed further for the PLA to fully understand the impacts, scale and timings of each of the options if they were to continue as two options.

- Paragraph 2.2.4:

In relation to the temporary marine related works, it is essential that all marine infrastructure is removed at the end of the construction phase and appropriate riverbed restoration is undertaken. This includes any temporary works to the riverbed itself.

- Paragraph 2.3.1:

In regards to decommissioning, would the River Thames feature in the removal of large items that are likely to be brought in by river? If so does this mean that any temporary construction works would need to be re-installed at the end of the operational lifespan of the proposed energy park?

Section 7: Topics included in the EIA scope:

- Paragraph 7.2.2:

In regards to the multi-modal impact assessment which will consider the impact of the proposed development on all relevant transport infrastructure, can it be confirmed what levels of estimated throughput the assessment will be using? The PLA note that the existing facility currently has a nominal throughput of 785,000 tonnes per annum (tpa), and the proposed development will likely have a nominal throughput of 655,000 tpa with a maximum throughput of 805,000 tpa being assumed. In addition the proposed anaerobic digestion facility will process up to approximately 40,000 tpa of waste. In total the amount of throughput to the existing / proposed sites via river of road is approximately 1,630,000 tpa, over double what comes into the site currently. Will the impacts of this scale of change be considered in the multi-modal impact assessment? In addition has an assessment been carried out regarding supply / demand for this level of additional throughput across the wider London area?

- Paragraph 7.2.3:

The PLA consider that it is essential that a Navigational Risk Assessment (NRA) is completed as part of the Environmental Statement, and that this covers impacts during both the construction and operation stages of the proposed development, particularly to assess any potential risks / impacts for vessels that currently use the safeguarded Middleton Jetty (as mentioned in paragraph 7.2.6)

- Paragraph 7.2.9:

The applicant must confirm with Transport for London (TfL) regarding any updated tools for the appraisal of the environmental impacts of transport and travel.

- Paragraph 7.2.16:

Noted that a hypothetical assessment will be made in terms of the environmental impacts assuming 100% of water delivered by road, with an aim to achieve a modal split by at least 75% by river. The PLA will need to be involved in discussions on the modal split as the scheme develops.

- Section 7.3 Air Quality:

Detailed air quality emissions from the river are missing. The long term impacts of air quality from the road have been assessed but not that from the river, which by the increase in load will also change, through more frequent vessel movements, and prolonged periods of emissions rather than significant gaps to allow more dissipation. It is not clear if the marine operation will mean that the local vessel/shunt will be in operation more as a result of the increased demand.

- Section 7.8 Marine Biodiversity:

At this stage marine ecology is difficult to assess as the applicant has not identified in this section what the likely interactions are for the two temporary construction works options and how they differ in scale and duration.

- Paragraph 7.8.4:

The information presented here is not up to date advice regarding the Thames Estuary recommended Marine Conservation Zone (rMCZ); as it is the PLA's understanding that this area is no longer being assessed by Natural England as a rMCZ.

- Paragraph 7.8.29:

The PLA agree that underwater noise disturbance impacts to migratory fish during the construction phase could be significant and require mitigation, the PLA will need to be involved in any discussions regarding appropriate mitigation measures.

- Paragraph 7.8.30:

The PLA should also be consulted regarding the proposed benthic surveys for the site.

- Paragraph 7.8.21:

There is currently little on what questions the morphology assessment will answer at this stage. Regarding this there should be consideration to potential physical impacts on nearby terminals and the navigation channel, not just the ecological receptors. Also in this paragraph does the applicant mean Water Framework Assessment rather than Water Quality Assessment here? The PLA consider that the sediment is just as important in regards to the various required assessments.

- Paragraph 7.9.9:

TE2100 was assessed some time ago, the PLA consider that while the river likely hasn't changed drastically, it is likely there is more recent data that could better inform the assessment. Please contact the PLA hydrographic team on Tel: 01474 562206. The hydrographic team has extensive bathymetric data both current and historical which is available for use subject to appropriate charges.

- Paragraph 7.9.27 & 7.9.28:

Data availability is also linked to the type of development and link to receptors.

- Paragraph 7.10.2:

For clarity, to confirm the River Thames actually forms part of the development site, rather than being located to the north of the site as mentioned in this paragraph.

I hope the above is of assistance to you.

Regards

Michael

Michael Atkins
Senior Planning Officer
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
01474 562 305
07712 247 115
WWW.PLA.CO.UK

- Find out more: www.pla.co.uk/Thames-Vision
- Follow us on twitter: @LondonPortAuth

cid:image002.png@01D37A74.79520610

Public Health England

CRCE/NSIP Consultations
Chilton
Didcot
Oxfordshire OX11 0RQ

T +44 (0) 1235 825278
F +44 (0) 1235 822614

www.gov.uk/phe

Hannah Pratt
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref: EN010093-000004

Our Ref : 41760

21st December 2017

Dear Hannah

Re: Scoping Consultation
Application for an Order Granting Development Consent for the proposed Riverside Energy Park

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Our response focuses on health protection issues relating to chemicals and radiation. Advice offered by PHE is impartial and independent.

We welcome the promoter's proposal to include a Health Impact Assessment (HIA) section within the Environmental Statement (ES), which will review the potential health impacts of the project. We understand these will be presented in other chapters (i.e. air quality, contaminated land, etc) and summarised in the HIA. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made the promoters should fully explain and justify their rationale in the submitted documentation.

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF). The proposer should confirm either that the proposed development does include or impact upon any potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

The attached appendix outlines generic areas that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission. We are happy to assist and discuss proposals further in the light of this advice.

Yours sincerely,

Environmental Public Health Scientist

nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA[1]. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES[2].

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place

---

[1] Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: http://webarchive.nationalarchives.gov.uk/20100410180038/http:/communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/

[2] DCLG guidance, 1999 http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf

to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
    - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
    - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air
When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water
When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality
We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the

migration of material off-site should be assessed[3] and the potential impact on nearby receptors and control and mitigation measures should be outlined.
Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).
For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

For wastes delivered to the installation:

- the EIA should consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report[4], jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report

[3] Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)
[4] Available from: http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf

suggested: “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible.” PHE supports the inclusion of this information within EIAs as good practice.

Electromagnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE’s predecessor

organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

http://webarchive.nationalarchives.gov.uk/+/www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m^{-1} (kilovolts per metre) and 100 μT (microtesla). The reference level for magnetic fields changes to 200 μT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure.

However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

http://www.emfs.info/policy/sage/

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection[5] (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards[6] (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

PHE expects promoters to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of

[5] These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at http://www.icrp.org/

[6] Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group). Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated[7]. The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate. The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012 [8].It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed. Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities[9]. PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years. The radiological assessment should consider exposure of

[7] HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients

[8] The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA). Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

[9] HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased. For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose. For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered. The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the ‘expected’ migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach[10] is used

[10] Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

Tel: 020 8921 5222

Ms Hannah Pratt
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN
17/3823/K

Directorate of Regeneration, Enterprise & Skills
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

19 December 2017

DECISION NOTICE – RAISE NO OBJECTION

Dear Ms Pratt,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site:	**Riverside Energy Park, Belvedere**
Applicant:	**Cory Environmental Holdings Limited**
Proposal:	**Scoping Opinion for a combined waste Energy Recovery Facility (ERF), battery storage, a roof-mounted solar photovoltaic installation, an anaerobic digestion facility and provision for CHP readiness generating a nominal rated electrical output of up to 96 MWe.**
Drawings	

I refer to your letter dated 28 November 2017 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **2** further observations to make, please see attached.

Thank you for consulting me on this matter.

Yours faithfully

[redacted]

Assistant Director

SCHEDULE OF OBSERVATIONS and INFORMATIVES
Application Reference: 17/3823/K
At: Riverside Energy Park, Belvedere

Observation 1

The applicant will need to demonstrate that there is no air quality impact to RB Greenwich.

Observation 2

RBG would recommend that the following is considered:

a. The Mayors Draft Environment Strategy is proposing that in areas which exceed legal air quality limits, the policy should prevent emissions from energy production plant, including from CHP that would exceed those of an ultralow NOx gas boiler. Would the proposed CHP have to comply with this policy requirement if it is adopted? Will the CHP be able to demonstrate compliance with this possible requirement?

b. The air quality assessment and dispersion modelling will need to take into account the topography of the proposed site and surrounding areas. RB Greenwich is situated at a higher ground level as compared to the proposed site.

c. if the infrastructure for the delivery of waste by barge is not already in place, then RBG would like the assessment to take a precautionary worst case approach by including the additional vehicles movements that would be covered by the barge shipments. This is to cover the eventuality that the infrastructure is not constructed and all waste movements are conducted by land. Similarly, the same approach should be taken if the applicant proposes to use the river way to ship materials to and from site during the construction phase of the project.

d. With regards to the barges, RBG would recommend LB Bexley liaise with the Port of London Authority to assess what boats/technology can be used to limit emissions from this source. For example, using hybrid boats over diesel and magnetic docking mechanisms to prevent idling engines.

e. With regards to the abatement product, is the 3% air pollution residues a weekly, monthly or yearly output?

f. The document states that there are multiple tall structures in the immediate area of the site; these needs to be taken into account in the dispersion modelling as they may impact on the dispersion from the proposed unit.

g. LAEI data when available should always be used over Defra data as it is specific to London.

h. Stack calculations should be included in the air quality assessment.

i. The dispersion modelling should include different stack height scenarios.

j. Modelling should account for dispersion near waterways as RBG believe they also impact on pollution dispersion.

Informative:

As part of the application, RBG would like the following to be taken into consideration:

1.An assessment of the potential to create a District Heat Network to Thamesmead;
2.Analysis of the site's potential energy supply and demand; and
3.Possibility of using waste heat from the nearby sewage works.

Riverside Energy Park

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 28 November 2017 requesting Royal Mail's comments on the information that should be provided in Cory Riverside Energy's Environmental Statement for the proposed Riverside Energy Park. Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report as submitted to the Secretary of State on 27 November 2017.

Royal Mail– relevant information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed road scheme.

Royal Mail's has nine operational properties within eight miles of the proposed Riverside Energy Park as listed and shown on plan below:

Abbey Wood Delivery Office	Nathan Way, London SE28 0AW	3.1 miles
London South East Parcelforce Depot	Unit 3 Optima Park, Thames Road, Dartford DA1 4QX	3.5 miles
Bexleyheath Delivery Office	2 Glengall Road, Bexleyheath DA7 4BS	3.5 miles
Woolwich Delivery Office	Pettman Crescent, London SE28 0FE	4.7 miles
Sidcup Delivery Office	19 Halfway Street, Sidcup DA15 8LG	5.5 miles
Dartford Delivery Office	50 West Hill, Dartford DA1 1AA	5.6 miles
Eltham + Lee Delivery Office	31-33 Court Yard, London SE9 5DD	6.7 miles
Eltham + Lee Vehicle Park	31-33 Court Yard, London SE9 5DD	6.7 miles
Blackheath Delivery Office	41 Blackheath Grove, London SE3 0AT	8.0 miles

In exercising its statutory duties Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by additional traffic arising from the construction of the proposed Riverside Energy Park. Consequently, Royal Mail is concerned about the potential for disruption to its operations during its construction phase. In particular, Royal Mail requires more information and certainty about traffic management measures that will be put in place to mitigate construction impacts on traffic flows within the surrounding highways network.

Royal Mail's comments on information that should be provided in Cory Riverside Energy's Environmental Statement

In view of the above, Royal Mail has the following comments / requests:

1. The ES should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted though full advance consultation by the applicant at the appropriate time in the DCO and development process.

2. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Cory Riverside Energy / its contractor, including a draft Construction Traffic Management Plan (CTMP).

3. Royal Mail is fully pre-consulted by Cory Riverside Energy / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant major road users.

Royal Mail is able to supply Cory Riverside Energy with information on its road usage / trips if required.

Should PINS or Cory Riverside Energy have any queries in relation to the above then in the first instance please contact Joe Walsh ***(joseph.walsh@royalmail.com)*** of Royal Mail's Legal Services Team or Daniel Parry-Jones ***(daniel.parry-jones@bnpparibas.com)*** of BNP Paribas Real Estate.

From:	Riverside Energy Park
To:	"Customer"
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	28 November 2017 11:12:53
Attachments:	image001.jpg

Hi Emma

Thank you for the email. We always consult with SGN on a precautionary basis because as we understand it, your PGT licence covers Great Britain. There is no obligation on you to respond if you do not have any further comments to make.

Kind regards
Hannah

From: Spence, Emma [mailto:Emma.Spence@sgn.co.uk] **On Behalf Of** Customer
Sent: 28 November 2017 10:57
To: Riverside Energy Park
Subject: RE: Riverside Energy Park - EIA Scoping notification and consultation

Hi Hannah,

I have checked the document and this is not covered by SGN's network? Is there something you would like help with?

Kind regards,

Emma Spence
Customer Service Advisor
T: 0800 912 1700
E: customer@sgn.co.uk
Find us on Facebook and follow us on Twitter: @SGNgas
cid:image001.jpg@01D0EC90.543660C0

Smell gas? Call 0800 111 999
Find out how to protect your home from carbon monoxide

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:18
To: 'NSIP.applications@hse.gov.uk' <NSIP.applications@hse.gov.uk>; 'barkdag.bdccg2@nhs.net' <barkdag.bdccg2@nhs.net>; 'GRECCG.NHSGreenwichCCG@nhs.net' <GRECCG.NHSGreenwichCCG@nhs.net>; 'bexccg.contactus@nhs.net' <bexccg.contactus@nhs.net>; 'dgs.ccg@nhs.net' <dgs.ccg@nhs.net>; 'consultations@naturalengland.org.uk' <consultations@naturalengland.org.uk>; 'info@london-fire.gov.uk' <info@london-fire.gov.uk>; 'enquiries@kent.fire-uk.org' <enquiries@kent.fire-uk.org>; 'enquiries@mopac.london.gov.uk' <enquiries@mopac.london.gov.uk>; 'contactyourpcc@pcc.kent.pnn.police.uk' <contactyourpcc@pcc.kent.pnn.police.uk>; 'Helen.Croxson@mcga.gov.uk' <Helen.Croxson@mcga.gov.uk>; 'marine.consents@marinemanagement.org.uk'

<marine.consents@marinemanagement.org.uk>; 'airspace@caa.co.uk' <airspace@caa.co.uk>; 'planningSE@highwaysengland.co.uk' <planningSE@highwaysengland.co.uk>; 'boroughplanning@tfl.gov.uk' <boroughplanning@tfl.gov.uk>; 'NSIPconsultations@PHE.gov.uk' <NSIPconsultations@PHE.gov.uk>; 'offshoreNSIP@thecrownestate.co.uk' <offshoreNSIP@thecrownestate.co.uk>; 'DIO-Safeguarding-Statutory@mod.uk' <DIO-Safeguarding-Statutory@mod.uk>; 'dgs.ccg@nhs.net' <dgs.ccg@nhs.net>; 'ped@londonambulance.nhs.uk' <ped@londonambulance.nhs.uk>; 'enquiries@secamb.nhs.uk' <enquiries@secamb.nhs.uk>; 'TownPlanningSE@networkrail.co.uk' <TownPlanningSE@networkrail.co.uk>; 'hreenquiries@highwaysengland.co.uk' <hreenquiries@highwaysengland.co.uk>; 'pressoffice@pla.co.uk' <pressoffice@pla.co.uk>; 'natssafeguarding@nats.co.uk' <natssafeguarding@nats.co.uk>; 'mail@homesandcommunities.co.uk' <mail@homesandcommunities.co.uk>; 'developmentenquiries@nwl.co.uk' <developmentenquiries@nwl.co.uk>; 'southernwaterplanning@atkinsglobal.com' <southernwaterplanning@atkinsglobal.com>; 'vicky.stirling@cadentgas.com' <vicky.stirling@cadentgas.com>; 'alans@espipelines.com' <alans@espipelines.com>; 'FPLPlant@fulcrum.co.uk' <FPLPlant@fulcrum.co.uk>; 'box.landandacquisitions@nationalgrid.com' <box.landandacquisitions@nationalgrid.com>; Customer <customer@sgn.co.uk>; 'enquiries@wwutilities.co.uk' <enquiries@wwutilities.co.uk>; 'enquiries@g2energy.co.uk' <enquiries@g2energy.co.uk>; 'assetrecords@utilityassets.co.uk' <assetrecords@utilityassets.co.uk>; 'paul.watling@london.gov.uk' <paul.watling@london.gov.uk>
Subject: Riverside Energy Park - EIA Scoping notification and consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Riverside Energy Park.

Please note the deadline for consultation responses is 26 December 2017. This deadline is a statutory requirement that has been triggered by submission of the Applicant's scoping report and cannot be extended.

Kind regards,
Hannah

Hannah Pratt
Senior EIA and Land Rights Advisor
Major Applications and Plans
The Planning Inspectorate, 3D, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Direct Line: 0303 444 5001
Helpline: 0303 444 5000
Email: Hannah.pratt@pins.gsi.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Developer Services
Southern Water
Sparrowgrove House
Sparrowgrove
Otterbourne
Hampshire
SO21 2SW

Tel: 0330 303 0119
Email: southernwaterplanning@atkinsglobal.com

Your Ref
EN010093
Our Ref
PLAN-020950
Date
20/12/2017

Dear Sirs,

Proposal: Scoping consultation to build, commission and operate an integrated Energy Park consisting of complementary energy generating development, with an electrical output of up to 96 megawatts (MWe), together with a new connection to the existing electricity network and provision for Combined Heat and Power (CHP) readiness.
Site: Riverside Energy Park, Belvedere, DA9 9AQ.
EN010093

Thank you for your letter of 28/11/2017

The development site is not located within Southern Water's statutory area for water supply, drainage and wastewater services. Please contact, the relevant statutory undertaker to provide water supply, drainage and wastewater services to this development.

Yours sincerely

[redacted]

Developer Services

From:	Nicola Downes EI
To:	Riverside Energy Park
Cc:	Toni Walmsley Macey EI
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	30 November 2017 11:49:37

Dear Hannah,

I can confirm that Surrey County Council, in its role as Highway Authority, does not have any comments to make in respect of this matter.

Regards,

Nicola

Nicola Downes
Senior Transport Development Planning Officer

Surrey County Council
Room 365, County Hall
Penrhyn Road
Kingston Upon Thames KT1 2DW
Direct Tel: 020 8541 7426
www.surreycc.gov.uk/tdp

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:30
To: Nicola Downes EI <nicola.downes@surreycc.gov.uk>; Toni Walmsley Macey EI <toni.walmsleymacey@surreycc.gov.uk>
Subject: Riverside Energy Park - EIA Scoping notification and consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Riverside Energy Park.

Please note the deadline for consultation responses is 26 December 2017. This deadline is a statutory requirement that has been triggered by submission of the Applicant's scoping report and cannot be extended.

Kind regards,
Hannah

Hannah Pratt
Senior EIA and Land Rights Advisor
Major Applications and Plans
The Planning Inspectorate, 3D, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Direct Line: 0303 444 5001
Helpline: 0303 444 5000
Email: Hannah.pratt@pins.gsi.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National

Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.

From:	Jacobson, Neil
To:	Riverside Energy Park
Cc:	info@riversideenergypark.com
Subject:	Riverside Energy Park - EIA Scoping notification and consultation
Date:	12 December 2017 15:54:50
Attachments:	Letter to stat cons_Scoping&Reg 11 Notification.pdf Plan.msg
Importance:	High

Dear Sirs

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11
Application by Cory Environmental Holdings Limited for an Order granting Development Consent for the Riverside Energy Park (the Proposed Development)

Thank you for your letter of 28th November (attached) inviting us to provide information relating to this proposed development.

We have assessed that the proposed electrical connection (option 1) across the Thames would affect The Crown Estate's riverbed, as shown on the attached plan. This is also the site of part of UK Power Network's cable tunnel, which is subject of a licence from us. We assume that the proposal for option 1 would entail use of the existing tunnel. Either way, our land would be affected and the applicant would need to discuss the proposal with us and obtain our prior consent, on terms to be agreed.

I hope this is helpful at this stage.

Neil Jacobson

Neil Jacobson
Head of Coastal

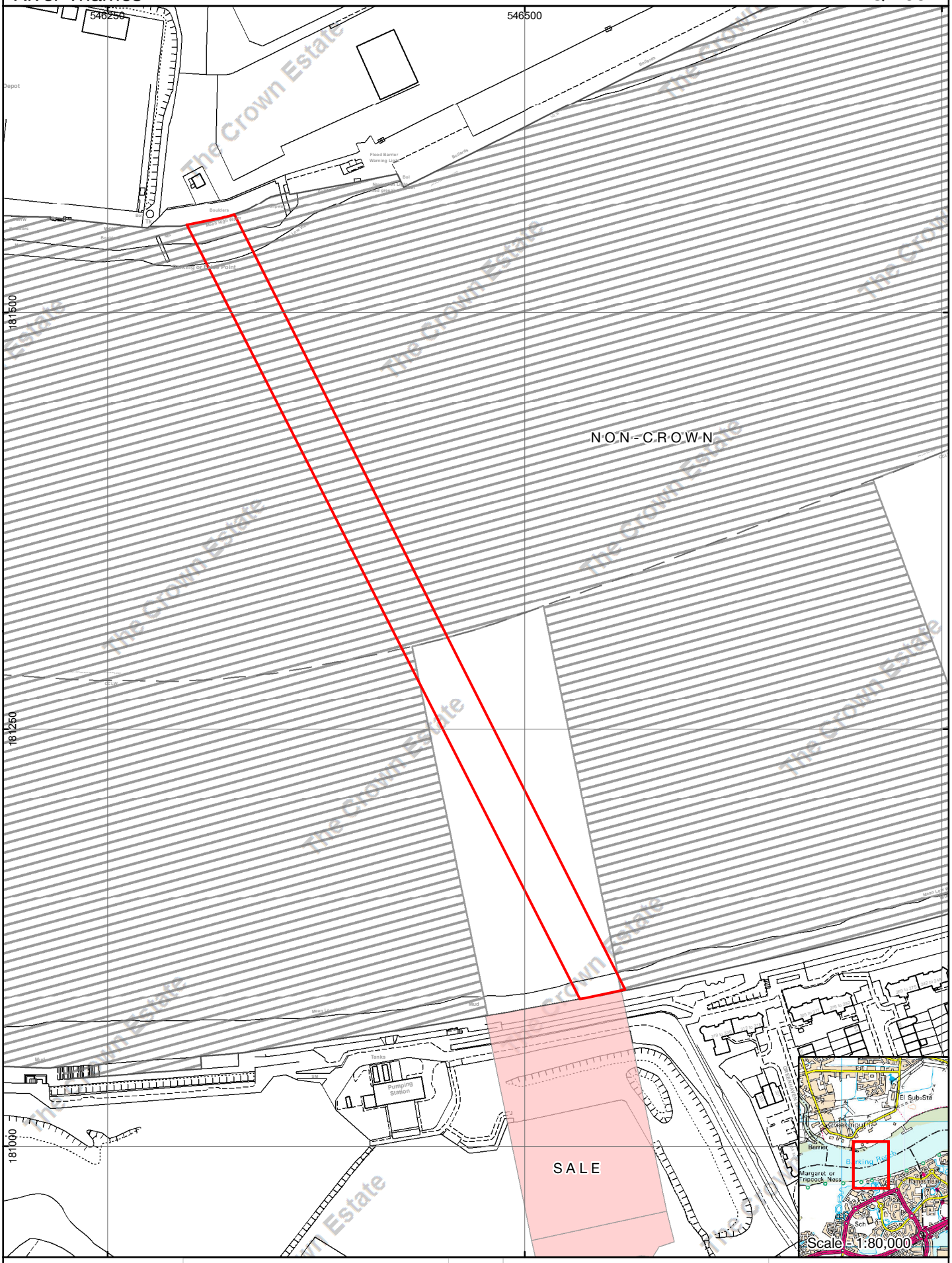
1 St James's Market, London, SW1Y 4AH
Tel: +44 (0) 20 7851 5189
www.thecrownestate.co.uk

Please think - do you need to print this email?

Cable Link Across River Thames At Creekmouth - Conflict Plan

River Thames

TQ 4681



GIS_2017_2548_V1	1:3,000 @ A4	N	0 20 40 60 80 100 metres	Date: 12/12/2017
Author:DJH QA: LP				Old File Ref: 11-16-20

1 St James's Market
London
SW1Y 4AH

THE CROWN ESTATE

K:\GIS\Casework\Coastal\311_River_Thames\2017\GIS_2017_2548_CableLinkAcrossRiverThamesAtCreekMouth\Documents\GIS_2017_2548_v1_DJH_CableLinkAcrossRiverThamesAtCreekMouth.mxd -- 12/12/2017 -- dhinton

From:	Stephen Vanstone
To:	Riverside Energy Park
Cc:	Thomas Arculus; Nicholas Saunders; Trevor Harris
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	15 December 2017 10:23:13
Attachments:	Letter to stat cons_Scoping&Reg 11 Notification.pdf

Good morning Hannah,

Trinity House advise that all marine works below the high water mark should be fully assessed within the Navigation Risk Assessment, provided as part of the Environmental Statement.

The Port of London Authority (PLA) should be consulted directly concerning the above, as well as any proposed risk mitigation measures relating to these marine works.

Kind regards,

Steve Vanstone
Navigation Services Officer

Navigation Directorate
Trinity House
Trinity Square
Tower Hill
London
EC3N 4DH

Tel: 0207 4816921
E-mail: stephen.vanstone@thls.org

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]
Sent: 28 November 2017 10:26
To: Navigation <Navigation.Directorate@thls.org>
Cc: Thomas Arculus <Thomas.Arculus@thls.org>
Subject: Riverside Energy Park - EIA Scoping notification and consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Riverside Energy Park.

Please note the deadline for consultation responses is 26 December 2017. This deadline is a statutory requirement that has been triggered by submission of the Applicant's scoping report and cannot be extended.

Kind regards,
Hannah

Hannah Pratt
Senior EIA and Land Rights Advisor
Major Applications and Plans
The Planning Inspectorate, 3D, Temple Quay House, Temple Quay, Bristol, BS1 6PN
Direct Line: 0303 444 5001
Helpline: 0303 444 5000
Email: Hannah.pratt@pins.gsi.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

This communication does not constitute legal advice.

Please view our Information Charter before sending information to the Planning Inspectorate.

From:	Danielle Thomas on behalf of Dig
To:	Riverside Energy Park
Subject:	RE: Riverside Energy Park - EIA Scoping notification and consultation
Date:	30 November 2017 12:28:37
Attachments:	image001.png

Good afternoon,

With regards to your below request, this is not Wales & West Utilities area. This falls within Southern Gas Network's area, contact details for them below:

Email: plantlocation@sgn.co.uk
Telephone: 0845 070 3497

If you have any further questions please don't hesitate to contact me. Many thanks

Kind Regards,

Danielle Thomas
Plant Protection Team
Administrator Assistant

Telephone: **02920 278 912**
Email: Danielle.Thomas@wwutilities.co.uk

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Celtic Springs | Newport | NP10 8FZ

From: Enquiries
Sent: 28 November 2017 10:53
To: Plant Protection Enquiries
Subject: FW: Riverside Energy Park - EIA Scoping notification and consultation

Good morning,

Please see the email below for your attention.

Should this email not be for your attention please forward this on to the relevant department and let me know as soon as possible.

Many thanks,

Dave Carter
Customer Experience Administrator
Wales & West Utilities Ltd

T: 02920 278982

From: Riverside Energy Park [mailto:RiversideEP@pins.gsi.gov.uk]