

Development Control
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The person dealing with this matter is



LONDON BOROUGH OF
BEXLEY

Direct Dial 020 3045 5771

Date **21 DEC 2017**

Mark Watling

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

For the attention of Ms Hannah Pratt

Dear Madam

RE Request to the Planning Inspectorate for a scoping opinion: Application by Cory Environmental Holdings Limited for an Order granting development consent for the Riverside Energy Park for the Secretary of States's opinion as to the information to be provided in an Environmental Statement relating to the proposed development. Riverside Energy Park Belvedere.

I refer to the above matter referred to the London Borough of Bexley for comment. Following a review of the information the London Borough of Bexley would wish the following points to be considered within the Environmental Impact Assessment:-

Section 7.2 deals with transport issues, and confirms that:

7.2.2 Chapter 7 of the ES will be based on a Transport Assessment (TA) and will follow a scope that they will seek to agree with Bexley and Transport for London in respect of impact on the surrounding transport infrastructure; and

7.2.3 An assessment of impacts during construction and operation on the river's capacity (in terms of levels of service and safety) through a Navigational Risk Assessment (NRA) appended to the ES.

Although the scope appears to generally cover the likely transport-related impacts, and some comfort is taken from the Applicant's confirmation (at 7.2.2) that they will seek to agree the scope of the TA with the Council, for the avoidance of doubt it should be clarified that the TA will need to cover likely impacts during construction and operation (and de-commissioning) the same as the NRA (confirmed at 7.2.3).

The scope and proposed methodologies for air quality and noise impacts in the ES are considered generally acceptable to the London Borough of Bexley and it is noted in paragraph 7.3.32 of the EIA Scoping Report that "...modelling will make use of mapped background concentration data from DEFRA...".

These background maps have been shown to be inaccurate for the Bexley area. There is a preference therefore that Bexley measured urban background measurements be used instead of the figures available on the modelled background maps provided by DEFRA.

In respect of issues relating to the London Borough of Bexley the applicant should contact Jon Fox (Team Leader: Environmental Protection; jon.fox@bexley.gov.uk), who leads on air quality matters, for any queries in this regard (and appropriate meteorological data sources).

As part of this process clarification may also need to be sought from the Greater London Authority on whether an additional "air quality neutral" assessment is required for a development of this type.

Bexley Council Officers have also spoken with officers from the Royal Borough of Greenwich who comment:-

- 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. It is my understanding that RB Greenwich is situated at a higher ground level as compared to the proposed site.
- c. I am unsure if the infrastructure for the delivery of waste by barge is already in place, if it is not, then I 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, it is suggested that the applicant 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 I believe they also impact on pollution dispersion.

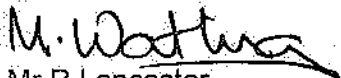
In principle officers from the London Borough of Bexley are supportive of these comments and statements. I understand that these may well have been forwarded as part of any formal comments provided by the Royal Borough of Greenwich following any direct consultation from yourself.

It is also recommended that the appropriate chapter of the EIA deals with Flood risk assessment and that a SuDS hierarchy is brought forward for surface water run off.

In relation to fire safety an undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes will be provided.

Following receipt of the Scoping opinion request for information to be included in the EIA the London Borough of Bexley consulted several external organisations (which the applicant may well have also consulted as on the Scoping opinion) for comments however given the tight deadline and the Christmas period very few were returned. If the London Borough of Bexley receives any relevant comments it will nevertheless forward these for your consideration.

Yours sincerely



Mr R Lancaster

RL

Head of Development Management