

Riverside Energy Park

Consultation Report Appendices

APPENDIX:

J

PLANNING INSPECTORATE REFERENCE NUMBER:

EN010093

DOCUMENT REFERENCE:

SUMMARY OF RELEVANT RESPONSES

November 2018 | Revision 0 | APFP Regulation 5(2)(g)

Planning Act 2008 | Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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Appendix J.1 Non-Statutory Consultation Comments and Applicant's Response

Non-statutory Consultation with the Local Community

The tables below sets out relevant responses received from the local community during the Non-Statutory Consultation in May 2018 (see Section 3 of the Consultation Report). Table 1 provides relevant responses received in response to the Comments Form (see Appendix D.4 of the Consultation Report) made available on the Riverside Energy Park website and at the non-statutory public exhibitions held in May 2018. In order to retain the context of the responses received, they are grouped in Table 1 under the Comments Form question they were provided in response to. Table 2 below provides a relevant response received in response to the Non-Statutory Consultation in May 2018 which was emailed to the Applicant instead of using the Comments Form.

Table 1 – Relevant response received in response to the Comments Form

Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Question 1 - Please tell us your views about our proposals					
Local Community	09.05.2018	29.05.2018	I am very pleased with upcoming proposals to improve and enhance non-recyclable waste in to carbon energy. As a local resident, I am in favour of this proposal. I would like the local community to have more information about what Riverside Park does. As you are proposing 85 new jobs could you decide specific jobs to local residents. Particularly unemployed young people (18-30yrs).	N	The Applicant undertook statutory section 47 consultation between 18 th June – 30 th July 2018 to give local people and stakeholders the opportunity to review further details about the proposals, ask the project team questions and provide feedback. Further information on the Proposed Development was therefore provided at this stage, as requested in the response. During this phase of consultation, the Applicant also presented the preliminary findings of environmental impact assessment (EIA) in the Preliminary Environmental Information Report (PEIR), which was available at the section 47 public exhibitions, as well as at Upper Belvedere Community Library, London Borough of Bexley Civic Offices and Dartford Library and on the website www.riversideenergypark.com/ Chapter 14 of the ES (Document Reference 6.1) includes an assessment of likely effects on the labour market and key

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					economic sectors of relevance to the Proposed Development. As detailed in Section 14.12 of the ES (Document Reference 6.1), the Applicant is committed to generating local economic benefit from the Proposed Development and has a preference to recruit locally where possible.
Local Community	09.05.2018	29.05.2018	I think the proposals are great, reducing environmental impact and maximising the need to fulfil the demand of energy consumption	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Generally positive, however I still have reservations about construction disruption.	N	<p>Several comments received during the non-statutory consultation raised concerns relating to potential disruption during the construction phase particularly from transport effects.</p> <p>As set out in Section 8.6 of the Consultation Report (Document Reference 5.1) the responses received during the non-statutory consultation informed the information presented at the statutory public exhibitions. The preliminary findings of potential effects during the construction phase were presented in the PEIR published during the statutory consultation.</p> <p>The final findings of potential construction impacts are contained within the ES that accompanies the DCO application. Temporary effects during construction will be mitigated as set out in Chapter 17 Schedule of Mitigation and Monitoring (Document Reference 6.1).</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) and an Outline Construction Traffic Management Plan (CTMP) (Appendix B.1) (Document Reference 6.3) have been prepared and submitted with the DCO application, which provide a framework for detailed management plans to be prepared at detailed design stage, in order to minimise and mitigate any impacts and/or disruption that may arise during the construction phase.
Local Community	09.05.2018	29.05.2018	Am concerned about air quality, environmental impact, interference with river for leisure e.g. rowing, yachting, fishing, walking (along river bank), river cruising. Concerned about cumulative effects.	N	The final findings of the assessment of potential impacts, including air quality effects and cumulative effects are contained within the ES (Document Reference 6.1). A Navigational Risk Assessment (NRA) (Appendix B.2 of the ES) has been prepared to assess navigational issues relating to the operational use of the River Thames. The NRA has identified that the additional movements associated with REP would have a Negligible impact upon navigational safety on the River Thames and these, in terms of the ES, are Not Significant. As such, there would be no impact or interference on use of the River Thames for leisure activities, such as those listed in the response. In addition, potential effects on tourism and recreation have been scoped out of the EIA on the grounds that any such effects are not likely to be significant in the context of the EIA Regulations

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>It may be necessary for the footpath adjacent to the River Thames in this location to be closed temporarily to facilitate construction of REP (as shown on the Access and Rights of Way Plans (Document Reference 2.3)). However, such closures will be limited and of a temporary nature and will be managed in accordance with procedures set out in a Code of Construction Practice, an outline of which is provided with the Application (Document Reference 7.5) and compliance with which is secured by a requirement in the draft DCO.</p> <p>The air quality assessment presented in Chapter 7 of the ES (Document Reference 6.1) has demonstrated that the Proposed Development will not result in any likely significant environmental effects on air quality, either as a standalone project or cumulatively with other projects.</p>
Local Community	09.05.2018	29.05.2018	Very interesting and dynamic. Would like to see money being put in for environmental work. To offset the carbon footprint.	N	<p>A report prepared by the Carbon Trust - ‘Cory Riverside Energy: A Carbon Case’, states that, ‘Energy generated at Riverside EfW was assumed to offset fossil fuels and thereby replace CO2 emissions.’</p> <p>Cory Riverside Energy: A Carbon Case - https://www.coryenergy.com/wp-content/uploads/2018/01/Cory-Carbon-Report-v1.1.pdf</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	The proposal make sense with a view to the future. My main concern is impact on the environment.	N	The ES (Document Reference 6.1) presents the findings of the EIA, a summary is included in Chapter 16 and the Non-Technical Summary (NTS) (Document Reference 6.4).
Local Community	09.05.2018	29.05.2018	As rubbish needs to be disposed of. We need to do something about it. We think increasing capacity of existing capacity is the best solution.	N	The Applicant has noted this response. The need for the Energy Recovery Facility (ERF) and Anaerobic Digestion facility components of Riverside Energy Park (REP) is described in the Project and its Benefits Statement (Document Reference 7.2). This document clearly demonstrates the need for additional capacity, in addition to that which already exists, and how the Applicant has maximised the efficiency of the existing site.
Local Community	09.05.2018	29.05.2018	London needs more green energy production and this proposal by Cory is welcomed by me, especially if done sensitively to the crossness nature reserve.	N	The Applicant has noted this. Chapter 11 of the ES (Document Reference 6.1) details the assessment of likely significant effects on terrestrial biodiversity, and mitigation measures that will be employed to minimise impacts on Crossness Local Nature Reserve (LNR). No likely significant residual effects have been identified.
Local Community	09.05.2018	29.05.2018	It will affect the open feel of the nature reserve to have yet another development close by. It needs to be kept as low as possible.	N	The Applicant has noted this response. A Townscape and Visual Impact (TVIA) assessment has been undertaken (see Chapter 9 of the ES (Document Reference 6.1)), the Applicant consulted on a number of overall building forms during non-statutory and statutory consultation which have been considered from a range of social, environmental and engineering perspectives. As set out in Chapter 9 and the Design Principles document

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					(Document Reference 7.4) and Design and Access Statement (Document Reference 7.3) the development of the design of the REP building and the selection of the preferred building form, reduces massing when compared to the alternatives, and provides embedded mitigation for visual effects, including from Crossness LNR.
Local Community	09.05.2018	29.05.2018	I think it’s a brilliant idea. With the increase of pollution in London, combined with the ever increasing population, sustainable and renewable energy is what is needed to help limit our footprint on the world.	N	The Applicant welcomes this comment and has sought to maximise the provision of renewable energy, including the incorporation of solar panels and an anaerobic digester in the Proposed Development..
Local Community	09.05.2018	29.05.2018	In principal the proposal makes sense given the increasing need for energy and recycling waste.	N	The Applicant welcomes this comment.
Local Community	09.05.2018	29.05.2018	The more waste we can use in this fashion the better, also for as many solar panels as you can fit into London.	N	The Applicant welcomes this comment and has sought to maximise the use of solar panel provision in the Proposed Development during the development of the design of the REP building and the selection of the preferred building form as explained in the Design and Access Statement (Document Reference 7.3).
Local Community	09.05.2018	29.05.2018	We believe that manufacturers should not be producing products with associated waste that then needs to be collected and incinerated. Biodiversity is necessary and so such reserves should not be.	N	In addition to the anticipated improvements in the prevention, re-use and recycling of waste, there remains an infrastructure deficit for the treatment of residual waste capacity that needs to be diverted from landfill and moved up the waste hierarchy. REP will help bridge that gap and be a suitable alternative to help treat London’s waste remaining after recycling, thereby providing an alternative in preventing waste

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>being sent to landfills or shipped overseas. Therefore, the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor’s ambitious recycling targets. Further details are provided in the Project and its Benefits Statement (Document Reference 7.2).</p> <p>Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified.</p>
Local Community	09.05.2018	29.05.2018	With an ever growing population especially in the SE corner of England I reluctantly have to accept that your proposals are absolutely necessary and as far as my very limited knowledge does seems to offer the best solutions.	N	The Applicant welcomes this comment and has sought to maximise the efficiency and use of their existing site.
Local Community	09.05.2018	29.05.2018	I think we should make more use of renewable energy sources, including waste, but there is no actual detail in this consultation as yet as to the number of road vehicles, or the river traffic, nor on their impact on local roads/population.	Y	<p>Several comments received during the non-statutory consultation raised concerns relating to potential disruption during the construction phase particularly from transport effects.</p> <p>As set out in Section 8.6 of the Consultation Report (Document Reference 5.1) the responses received during the non-statutory consultation informed the information presented at the statutory public exhibitions. The preliminary findings of potential effects during the construction</p>

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					<p>phase were presented in the PEIR published during the statutory consultation. Further, the ES now includes details relating to number of road users and their potential impact. The final findings of potential construction impacts are contained within the ES that accompanies the DCO application. Temporary effects during construction will be mitigated as set out in Chapter 17 Schedule of Mitigation and Monitoring (Document Reference 6.1).</p> <p>The Transport Assessment (TA) (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1) consider the impacts on transport during construction and operation.</p> <p>An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) and an Outline CTMP (Appendix B.1 (Document Reference 6.3)) have been prepared and submitted with the DCO application, which provide a framework for detailed management plans to be prepared at detailed design stage, in order to minimise and mitigate any impacts and/or disruption that may arise during the construction phase.</p>
Local Community	09.05.2018	29.05.2018	The answers are yes to all but please take account of the wonderful crossness nature reserve and its inhabitants and minimise any disruption to this.	Y	Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial

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					<p>biodiversity. Chapter 11 of the ES considers the potential effects of the Proposed Development on ecological resources, including the Crossness Local Nature Reserve (LNR). Residual effects are not anticipated to be significant on the Crossness LNR, following appropriate mitigation.</p> <p>Since the production of the PEIR, an Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been produced and is submitted with the DCO Application. This addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p>
Local Community	09.05.2018	29.05.2018	But the issue is about Cory having been subjected to 2 public inquiries in 2003 and 2005, have the lessons been learnt and will residents concerns be genuinely fully and properly heard and addressed?	Y	<p>The Applicant has had the benefit of operating within the local community for a number of years and is highly active with community groups such as the Belvedere Community Forum. As such the Applicant has undertaken extensive consultation with the local community as described in the Consultation Report (Document Reference 5.1). Section 9.6 sets out how the consultation has been undertaken iteratively, following early feedback from statutory consultees and the local community. Appendices J.1 – J,4 (including this appendix) of the Consultation Report (Document Reference 5.1) provide</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					detailed comments on relevant responses received.
Local Community	09.05.2018	29.05.2018	Once again, Belvedere residents have to tolerate yet more of London's waste being recycled on our doorstep. We already process London's sewerage and some of its rubbish. Belvedere suffers all the pain and none of the gain. So much for regenerating the area - all this will do is to make Belvedere even less a desirable place to live.	N	The Applicant notes this response. The details about the need for and benefits of the Proposed Development are provided in the Project and its Benefits Report (Document Reference 7.2). These include the generation of renewable energy, moving waste away from landfill and maximising the use of the River Thames to remove HGVs from the local road network. Potential impacts of the Proposed Development on the local community has been assessed as part of the ES. A Non-Technical summary of this assessment is provided in (Document 6.4). There will be significant benefits for the local community through Cory's investment as described in the Project Benefits Report (Document 7.2) and Socio Economic assessment (Chapter 14). Cory has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley.
Local Community	09.05.2018	29.05.2018	I agree with the principals but feel that more can be done to minimise the impact on the adjacent local nature reserve.	Y	Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity. Chapter 11 of the ES considers the potential effects of the Proposed Development on ecological resources, including the Crossness Local Nature Reserve (LNR). Residual effects are not anticipated to be significant on the

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					<p>Crossness LNR, following appropriate mitigation.</p> <p>Since the production of the PEIR, an Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been produced and is submitted with the DCO Application. This addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p>
Local Community	09.05.2018	29.05.2018	I think it is unfortunate to have yet more development immediately adjacent a Local Nature Reserve, but am pleased that the footprint doesn't include land that will directly displace sensitive wildlife species.	Y	<p>Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity. Chapter 11 of the ES considers the potential effects of the Proposed Development on ecological resources, including the Crossness Local Nature Reserve (LNR). Residual effects are not anticipated to be significant on the Crossness Local Nature Reserve (LNR), following appropriate mitigation.</p> <p>Since production of the PEIR, an Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been produced and is submitted with the DCO Application. This addresses protection and appropriate working measures which will be required during construction, operation and</p>

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					decommissioning to protect the habitats and species within these nearby areas.
Local Community	09.05.2018	29.05.2018	<p>By way of background I have lived in Belvedere Park at the bottom of Norman Road for 2 and a half years and visit Crossness Nature Reserve, which has become an incredibly important part of my life, most days. I most often walk along the Thames from Erith past your incinerator to do so. I am absolutely dismayed, but not surprised, by your plans and your continued self- aggrandising marketing of yourselves as keepers of the renewable energy flame, selflessly collecting the waste of London’s rich before taking it down the Thames to incinerate it on the doorstep of one of its poorer boroughs.</p> <p>ur hateful incinerator on the edge of a residential development and a protected Nature Reserve is perverse enough, but you are now planning to add what I understand will be the biggest building in the vicinity on top of the 4 storey data centre you already have outline planning consent for in an area known to be a breeding ground for skylarks and water voles on Cory fields. Proposing a second incinerator, with all that implies for public health and the added impact of particles in the atmosphere, is absolutely beyond belief. The impact on Crossness Nature Reserve and its wildlife will be self-evidently destructive if not disastrous. You have made no mention in your marketing materials of the fact you would be building your second (and, potentially your third if the data centre goes ahead) major building on the very edge of one of London’s last areas of grazing marshland and an important habitat for birds, mammals and reptiles. The information you have made available re your new “energy park” is vague and misleading. I strongly oppose the mere proposal of this “park” (and your data</p>	Y	<p>The Applicant undertook statutory section 47 consultation between 18th June – 30th July 2018 to give local people and stakeholders the opportunity to review further details about the proposals, ask the project team questions and provide feedback. Further information on the Proposed Development was therefore provided at this stage, as requested. During this phase of consultation, the Applicant also presented the preliminary findings of environmental impact assessment (EIA) in the Preliminary Environmental Information Report (PEIR), This provided all the detail available at the time and this was available at the section 47 public exhibitions, as well as at Upper Belvedere Community Library, London Borough of Bexley Civic Offices and Dartford Library and on the website www.riversideenergypark.com/.</p> <p>The Applicant had regard to feedback from the non-statutory consultation which informed information provided during the statutory section 47 consultation. The preliminary findings of environmental assessments were presented in the PEIR, which was available at the section 47 public exhibitions. Chapter 7 of the PEIR considered the preliminary impacts of air quality on human health and Chapter 11 of PEIR considered the preliminary impacts on</p>

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			<p>centre), let alone its construction. Your attitude appears to be that as the Reserve is already encircled by a hideous amount of industry that a couple more monstrosities will make little difference. But two (or in your case, three) wrongs do make a right.</p>		<p>terrestrial biodiversity, including impacts on Crossness Local Nature Reserve. The preliminary findings of the Health Impact Assessment (HIA) (Appendix K of the PEIR technical appendices) were also available at the section 47 public exhibitions.</p> <p>The information provided was comprehensive, and appropriate to the stage at which development of the proposals had reached. The Applicant does not accept that any information presented throughout the non-statutory or statutory consultation was vague or misleading. Further, members of the Project Team, including technical experts were present at all events to answer any questions that members of the public and stakeholders might have regarding the Proposed Development.</p> <p>Since production of the PEIR, more detail on the Proposed Development and its potential impacts has been gathered and this is presented in the ES. The final findings of the environment assessments are presented in the ES (Document Reference 6.1). Chapter 11 of the ES considers the potential impacts on terrestrial biodiversity, particularly impacts from lighting, shade and surface run-off pollution. No likely significant residual effects on designated areas, such as Crossness LNR, have been identified.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6).</p> <p>Human health has also been considered within Chapter 7 of the ES (Document Reference 6.1) and the Health Impact Assessment (Appendix K.1, Document Reference 6.3). Furthermore, the Applicant consulted with Public Health England (PHE) under section 42 of the Planning Act. PHE commented on the PEIR findings and were satisfied with the proposed methodology. The air quality assessment also had regard to PHE’s comment and addressed them within Chapter 7 of the ES. No significant effects on human health have been identified.</p> <p>A full Townscape and Visual Impact Assessment (TVIA) has been undertaken and the findings are presented in Chapter 9 of the ES (Document Reference 6.1). The TVIA presents the effects on the townscape features and character of the Application Site, and the townscape character of the study area and also provides an assessment of effects on people’s views and visual amenity arising from the construction, operation and decommissioning of the Proposed Development.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Embedded mitigation is provided by the Design Principles (Document Reference 7.4) detailing the design process of materials selection and Context Colour Palettes to integrate the development into the context of its surroundings.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation</p> <p>There is a national need for major energy infrastructure, such as REP, as established in the NPS EN-1 and NPS EN-3. REP also supports regional and local waste management needs. Over two million tonnes of London’s non-recyclable waste is currently sent to landfill or shipped overseas. London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London’s waste is currently sent will be operational after 2025. Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London’s waste management shortfall but will also be a huge benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transported much further away to be processed. The benefits of REP are</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					presented in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	<p>The positives are that Cory appears to intend to stay within the existing developed footprint (we trust that this will remain the case), install some genuine renewable energy and make better use of 'waste' heat.</p> <p>We are dismayed by the prospect of yet more very large buildings right next to Crossness Nature Reserve, to add to the recently-approved 4-storey data centres on Borax fields, further reducing the 'big sky' feel of what little is left of the marshes, and the view from inland to the river. It would appear that despite the high wildlife value of even the existing remnants of the marshes at both Erith and Crayford, neither private interests nor Bexley Council are prepared to say enough is enough and stop putting in and approving development applications that will either reduce the remaining open ground and/or have other negative impacts on their character.</p>	Y	<p>Chapter 9 of the ES (Document Reference 6.1) presents findings of the assessment of likely significant townscape and visual effects including on townscape features of the Application Site, the townscape character of the study area for this topic and the visual amenity of sensitive receptors arising from the construction, operation and decommissioning of the Proposed Development. This has identified both adverse and beneficial likely significant effects from the construction, operation and decommissioning of REP. More details are provided in Chapter 9 of the ES (Document Reference 6.1). Furthermore, the Applicant has developed Design Principles (Document Reference 7.4) which the detailed design must be in accordance with to ensure mitigation for any visual effects is secured within the DCO application.</p> <p>Chapter 11 of the ES considers the potential impacts on terrestrial biodiversity, particularly impacts from lighting, shade and surface run-off pollution. No likely significant residual effects on designated areas, such as Crossness LNR, have been identified. Mitigation measures to ensure Crossness LNR is protected as far as</p>

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					practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6).
Local Community	09.05.2018	29.05.2018	It is with great sadness to have this horrible development right at my door step. It seems these developers are trying to make it look like a good thing but it's a health hazard and those people who build it would never ever want it on their doorsteps. As well as having a health hazard, this will affect our property prices which I know for a fact the developers will not care about because it is not on their doorstep. It's very bad of Bexley Council to allow such development in the mix of residential property where we call home.	N	<p>The potential impacts on human health as a result of the Proposed Development have been considered within Chapter 7 of the ES (Document Reference 6.1) and the Health Impact Assessment (Appendix K.1, Document Reference 6.3). Furthermore, the Applicant consulted with Public Health England (PHE) under section 42 of the Planning Act 2008. PHE commented on the PEIR and were satisfied with the proposed methodology. No significant effects on human health have been identified.</p> <p>There is no proven link between energy generation development and a decline in property prices. The location is considered suitable as it maximises the use of the River Thames and existing infrastructure.</p>
Question 2: Do you think more of London's waste should be treated in London?					
Local Community	09.05.2018	29.05.2018	Yes absolutely! I think if its treated in London, there would be a greater efficiency as its treated locally.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes - where efficient ways are possible.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	If possible but there is a lack of opportunity within the "City of London" Cory is in a prime location to be treating London's waste with the new site being able to provide much needed local employment within a manual labour borough.	N	The Applicant has noted this response.

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Local Community	09.05.2018	29.05.2018	Yes, reduce transport impacts	N	The Applicant has noted this response and intends to reduce transport impacts through the River Thames.
Local Community	09.05.2018	29.05.2018	Absolutely! This along with a harder stance on recycling and renewable energy	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Consider a colour scheme with varying shades to help the facility blend in to the sky line. Blue more than green. Curviest & automated washing for panels.	N	<p>With regard to the colour scheme of the development, the Design Principles (Document Reference 7.4) set out the in-principle approach to design considerations for the Proposed Development. The final design, including colour palette, will be determined at the detailed design stage in accordance with the Design Principles.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>
Local Community	09.05.2018	29.05.2018	It depends on what is practical pragmatic & environmentally friendly. If treating more of London’s waste in London has the net benefit of reducing the impact on the environment overall, then yes.	N	London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London’s waste is currently sent will be operational after 2025 and London exports a significant amount of waste abroad for treatment

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					which is not sustainable. Further detail on how REP meets this need and the other benefits of the Proposed Development are presented in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	It should be treated in the borough’s which produce it or as near as possible	N	<p>London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London’s waste is currently sent will be operational after 2025. Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London’s waste management shortfall but will also be a huge benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transported much further away to be processed. Further detail on how REP meets this need and the other benefits of the Proposed Development are presented in the Project and its Benefits Report (Document Reference 7.2).</p> <p>The potential environmental impacts associated with the Proposed Development have been assessed within the ES (Document Reference 6.1)</p>
Local Community	09.05.2018	29.05.2018	Yes, but which part. Whoever you select and whichever area, someone will be unhappy. Using the	N	The Applicant has noted this response. The Applicant considers the location of REP to be highly suitable for this type of

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			river is a must. It is direct access. How many plants can belvedere take?		development as it maximises the use of existing infrastructure (the jetty and the River Thames). The Proposed Development can be provided without significant effects on the environment or the local community, as shown by the findings of the EIA, presented in the Environment Statement (Document Reference 6.1) a non-technical summary of which is provided with the Application (Document Reference 6.4). The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	Yes, I do: - Generating power, is going to be beneficial for us. (create more jobs).	N	The Applicant has noted this response. Chapter 14 of the ES (Document Reference 6.1) sets out the socio-economic benefits of the Proposed Development.
Local Community	09.05.2018	29.05.2018	Yes and no. I believe the proposed site already has enough bad air pollution but I would not like to see it shipped around to alternative areas in lorries.	N	An assessment of the impacts on air quality from the Proposed Development during its construction and operation has been undertaken. The findings of this assessment are presented in Chapter 7 of the ES (Document Reference 6.1). The air quality assessment has concluded that the Proposed Development will not result in any likely significant environmental effects on air quality, either as a standalone project or cumulatively with other projects.
Local Community	09.05.2018	29.05.2018	Yes, provided it is transported by river and not by road.	N	The Applicant has noted this response. REP is ideally located to maximise the use of the River Thames and the Applicant’s existing infrastructure for transporting waste and ash. The DCO application has considered the environmental impacts of

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					transporting waste by both road and river, and a Navigational Risk Assessment (NRA) (Appendix B.2 of the ES, Document Reference 6.3) has been undertaken to identify any navigational issues with using the River Thames.
Local Community	09.05.2018	29.05.2018	Yes though perhaps not all in one location but a good example for other major cities to follow around the UK and World.	N	REP is ideally located to maximise the use of the River Thames. REP being located adjacent to Cory’s existing RRRF has allowed the Applicant to maximise the use of existing infrastructure for transporting waste and ash.
Local Community	09.05.2018	29.05.2018	I agree that we should be treating our waste here, not filling a hole in China.	N	The Applicant has noted this response and welcomes the recognition of the need to stop sending waste abroad. London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London’s waste is currently sent will be operational after 2025 and, as the response notes, London exports a significant amount of waste abroad for treatment which is not sustainable. The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	West London’s waste should be treated in West London. Not here in the South East. Why should we have to carry the burden of them not sorting their waste properly and being able to send to us for treatment/disposal. Every borough should have their own mini plant.	N	The Applicant has noted this response. The Energy Park’s location within the capital means that it will likely receive waste taken from across London, maximising the use of existing waste transfer stations at wharves along the River Thames. REP will therefore support London’s policy aspiration for net self-sufficiency and help bridge the

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					infrastructure gap. Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London’s waste management shortfall but will also be a benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transport much further away to be processed. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	Ideally waste should be prevented at source.	N	REP will support the waste hierarchy principles and make best use of the residual waste arising in London. Despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from landfill. REP will be a suitable alternative to help treat London’s waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Furthermore, the Anaerobic Digestion Facility will accept green and food waste and, therefore, help contribute towards the zero biodegradable or recyclable waste being sent to landfills. As such, REP will support the drive to move waste further up the waste hierarchy for waste that cannot be prevented. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	Whilst I agree that London’s waste should be treated in London, I don’t think there is anything “green” about burning it and producing toxic fumes and polluting ashes in the process.	N	<p>The Applicant has noted this response. An air quality assessment of the impacts of the Proposed Development during its operation has been produced. The findings of this assessment are presented in Chapter 7 of the ES (Document Reference 6.1). The air quality assessment concluded that the Proposed Development will not result in any likely significant environmental effects, either as a standalone project or cumulatively with other projects.</p> <p>REP will also be subject to stringent modern emission standards and will require an Environmental Permit from the Environment Agency in order to operate. The Applicant’s existing RRRF has been meeting all emissions standards since it opened in 2011.</p> <p>REP will support the waste hierarchy principles and make best use of the residual waste arising in London. Despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from landfill. REP will be a suitable alternative to help treat London and the South East’s waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. As well as electricity and heat, the Energy Recovery Facility will produce by-products (Incinerator Bottom Ash and Air Pollution Control Residue), both of which will be</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					recycled for use in the construction industry, and thereby contribute to the circular economy. Furthermore, the Anaerobic Digestion Facility will accept green and food waste and, therefore, help contribute towards the zero biodegradable or recyclable waste being sent to landfills. As such, REP will support the drive to move waste further up the waste hierarchy for waste that cannot be prevented. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	We believe that all of London’s waste should be re-used and recycled by the means producing the least negative environmental impact, which will usually be as close as possible to source to minimise transport energy costs and maximise local jobs. Any long-distance transport should be by the least environmentally damaging means.	N	REP will support the waste hierarchy principles and make best use of the residual waste arising in London. Despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from landfill. REP will be a suitable alternative to help treat London’s waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. As well as electricity and heat, the Energy Recovery Facility will produce by-products (Incinerator Bottom Ash and Air Pollution Control Residue), both of which will be recycled for use in the construction industry. Furthermore, the Anaerobic Digestion Facility will provide an ‘in borough solution’ and accept green and food waste and, therefore, help contribute towards the zero biodegradable or recyclable waste being sent to landfill.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Further details are provided in the Project and its Benefits Report (Document Reference 7.2).</p> <p>REP will be ideally located to maximise the use of the River Thames and the Applicant’s existing infrastructure for transporting waste and ash. An assessment of likely significant effects on Transport arising from the Proposed Development are presented in Chapter 6 of the ES (Document Reference 6.1).</p> <p>The Applicant employs 365 people across London and expects the Proposed Development to create a further c. 85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. The Proposed Development will require a workforce in excess of 6,000 people over the construction period. These job opportunities will be advertised to the local community; however precise percentage commitments cannot be confirmed at this time.</p>
oQuestion 3: Are you in favour of making greater use of the river?					
Local Community	09.05.2018	29.05.2018	The river is important me and would like to make great use of it. As part of using local resources, why not use the river if it can create or improve energy. My question is how does you proposed impact the animals e.g. fish that live-in water.	N	In February 2018, following design iterations of REP and the likely construction methodologies, the need to undertake any temporary works within the River Thames was removed. As such, the scope of the EIA was refined and excluded an assessment of the likely impacts of the temporary works in the River Thames, as no works in the River Thames would be

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					<p>required as part of the Proposed Development.</p> <p>The Applicant has engaged with a number of stakeholders to confirm that surveys of the marine environment are not required, as no likely significant effects on marine biodiversity are anticipated.</p>
Local Community	09.05.2018	29.05.2018	Yes – if noise impact is controlled	N	<p>The Applicant has noted this response. A noise assessment has been conducted which assesses the likely effects of the construction, operation and decommissioning of the Proposed Development on the noise and vibration climate of the area. The findings of this assessment are presented in Chapter 8 of the ES (Document Reference 6.1). No likely significant effects have been identified.</p> <p>An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts noise and vibration during construction.</p>
Local Community	09.05.2018	29.05.2018	Yes, it is an age old highway that gives Cory direct link minimising its environmental impact. This form of transportation allows for larger transport link with less pollution.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes, causes less pollution and means that roads (already very congested) will not get worse from lorry traffic. Also, the river is underused for its primary function as a direct “HIGHWAY”	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes, to reduce lorry traffic	N	The Applicant has noted this response.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	Yes! We need to maximise the rivers potential	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Once the River’s biome & economy are protected yes.	N	<p>Following changes to the design in March 2018, there will be no direct impacts to the River Thames or aquatic biodiversity. Therefore, the requirement for a full marine biodiversity assessment has been scoped out. This was set out in <i>REP: removal of river works and amend scope of EIA Technical Note</i> circulated to prescribed consultees on 23rd March 2018 (see Appendix C.28 of the Consultation Report, Document Reference 5.1) and agreed with LBB on 26th September 2018.</p> <p>A Navigational Risk Assessment (NRA) (Appendix B.2 of the ES) has been prepared to assess navigational issues relating to the operational use of the River Thames. NRA has identified that the additional movements associated with REP would have a Negligible impact upon navigational safety on the River Thames and these, in terms of the ES, are Not Significant.</p>
Local Community	09.05.2018	29.05.2018	Yes, to reduce traffic on roads	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes, in enclosed containers	N	The Applicant has noted this response. Waste will be transported to REP in sealed containers.
Local Community	09.05.2018	29.05.2018	Within reason as long as it does not interfere with leisure facilities	N	The Applicant has noted this response. A Navigational Risk Assessment (NRA) (Appendix B.2 of the ES, Document Reference 6.3) has been prepared to assess navigational issues relating to the operational use of the River Thames, including the use of the river for recreational

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					or tourist vessels. The NRA has identified that the additional movements associated with REP would have a negligible impact upon navigational safety on the River Thames and these, in terms of the ES, are not significant. As such, there would be no impact or interference on use of the River Thames for leisure activities, such as those listed in the response.
Local Community	09.05.2018	29.05.2018	Absolutely. Too many years neglected for transport use.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes. The Thames is --- and would like to see it being used more productively.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes as long as there isn't an increase in pollution thus impacting on the river water quality and wildlife	N	<p>The Applicant has noted this response.</p> <p>Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified.</p> <p>Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from the Proposed Development. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i>
Local Community	09.05.2018	29.05.2018	I live beside the river and am in favour of making more use of it to transport waste and other materials.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	We believe that the rivers should be protected and kept clean. Not contaminated for profit.	N	The Applicant has noted this response. An ES has been submitted as part of this application which details the findings of the Environmental Impact Assessment (EIA) undertaken (Document Reference 6.1). Chapter 12 of the ES presents the finding of the assessment of the potential effects on water resources. No significant effects have been identified. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i>
Local Community	09.05.2018	29.05.2018	Happy for the river to be used, however too much litter in River and shoreline.	N	The Applicant has noted this response. The waste will be transported to REP in sealed containers and therefore there will be no

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					contribution to litter in the River Thames arising from the Proposed Development.
Local Community	09.05.2018	29.05.2018	I am all in favour of using the river for transportation of waste	N	REP will be ideally located to maximise the use of the River Thames and the Applicant’s existing infrastructure for transporting waste and ash. An assessment of likely significant effects on Transport arising from the Proposed Development are presented in Chapter 6 of the ES (Document Reference 6.1) .
Local Community	09.05.2018	29.05.2018	Rivers should not be contaminated	N	An ES has been submitted as part of this application which details the findings of the Environmental Impact Assessment (EIA) undertaken (Document Reference 6.1). Chapter 12 of the ES discusses the finding of the assessment of the potential effects on water resources. No significant effects have been identified. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i>
Local Community	09.05.2018	29.05.2018	I am in favour of making greater use of the river, rather than increasing vehicular movements, but hope that the estuarine location will be properly considered in terms of its value to ecology and to local residents (i.e. minimal aesthetic impacts from the building itself;	N	Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			<p>sensitivity to light pollution spilling onto the nature reserve and negatively impacting nocturnal species, including the European Protected bat species and the Schedule 1 Barn Owl that breed on the reserve).</p>		<p>effects on terrestrial biodiversity as result of the Proposed Development. The assessment included potential impacts of lighting including impacts on the LNR and wildlife within it, such as bats and birds (including owls).</p> <p>No likely significant residual effects have been identified.</p> <p>Chapter 9 of the ES (Document Reference 6.1) presents findings of the assessment of likely significant townscape and visual effects including on townscape features of the Application Site, the townscape character of the study area for this topic and the visual amenity of sensitive receptors arising from the construction, operation and decommissioning of the Proposed Development. This has identified both adverse and beneficial likely significant effects from the construction, operation and decommissioning of REP. More details are provided in Chapter 9 of the ES (Document Reference 6.1). Furthermore, the Applicant has developed Design Principles (Document Reference 7.4) which the detailed design must be in accordance with to ensure mitigation for any visual effects is secured within the DCO application.</p> <p>As set out in Chapter 9 of the ES, the Design Principles document and the Design and Access Statement (Document</p>

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					<p>Reference 7.3) the development of the design of the REP building and the selection of the preferred building form has sought to reduce massing when compared to the alternatives, and provides embedded mitigation for visual effects, including from Crossness LNR.</p> <p>An outline Lighting Strategy has been submitted as part of this application (Appendix K.3 of Chapter 15 the ES (Document Reference 6.3)), which sets out the principles to mitigate potential effects that could arise from external artificial lighting associated with the Proposed Development. A final lighting design will be developed in accordance with the principles at the detailed design stage.</p>
Local Community	09.05.2018	29.05.2018	What you propose is going to further pollute the local area. The river is used and polluted enough already.	N	<p>An ES has been submitted as part of this application which details the findings of the Environmental Impact Assessment (EIA) undertaken (Document Reference 6.1). Chapter 12 of the ES discusses the finding of the assessment of the potential effects on water resources. No significant effects have been identified.</p> <p>The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in</i></p>

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					<i>the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i>
Local Community	09.05.2018	29.05.2018	Any long-distance transport should be by the least environmentally damaging means. In cases where this means by river, we would support river. In this instance we oppose any increase in lorry movements in Bexley to feed an incinerator.	N	The Applicant has noted this response. REP will be ideally located to maximise the use of the River Thames and the Applicant’s existing infrastructure for transporting waste and ash. The DCO application has considered the environmental impacts of transporting waste by both road and river, the likely significant effects are presented in Chapter 6 of the ES (Document Reference 6.1).
Question 4: Do you support maximising reliable renewable energy generation for London and the UK?					
Local Community	09.05.2018	29.05.2018	Yes, with more resources in decline there is a definite need to be able to repurpose existing materials	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes, would save importing power from France etc. therefore giving us more independence	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Within reason and effectiveness yes.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes because sending waste abroad for renewable energy there is not productive	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	I do. Its good to know that its going to reduce ‘Carbon emissions’. - Our waste isn’t going to be exported in the future = we get energy out of it, remains here.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes. I believe it is a better way forward than nuclear	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Certainly, similar claims were made for the existing incinerator and these proved to be considerable technical problems not mentioned at the enquiry. Is the current proposal more robust?	N	The Applicant has noted this response. Further details about the consideration of technology choice for the Proposed Development are provided in the Project and its Benefits Report (Document Reference 7.2). Cory’s existing RRRF has been operating successfully since 2011 and

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					has consistently operated within all pollution limits. Contrary to the suggestion made in the response, no technical problems have been experienced at the existing RRRF.
Local Community	09.05.2018	29.05.2018	There needs to be a balance between the needs of the people v wildlife	N	The Applicant has noted this response. Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified.
Local Community	09.05.2018	29.05.2018	Yes in principle but not at any cost - where there is a possibility of improving life for people and wildlife then both should be balanced	N	The Applicant has noted this response. Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified.
Local Community	09.05.2018	29.05.2018	I am all for the production of greener and more sustainable energy but I am interested in the impact on air pollution. What exhaust filtering processes will be in place to ensure pollutants and particulates are at 21st century levels? Hospital admissions on respiratory related ailments in the area are higher than average which could be apportioned to the current waste burning facility.	N	Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality assessment. As demonstrated in the ES, the air quality impacts of the ERF and of additional road and river transport associated with REP are expected to be not significant and will comply with national, regional and local air quality policy requirements.

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					<p>As part of the air quality assessment, health impacts of emissions were also considered. No significant effects to human health are identified. Furthermore, the Applicant consulted with Public Health England (PHE) under section 42 of the Planning Act. PHE commented on the PEIR findings and were satisfied with the proposed methodology. The air quality assessment also had regard to PHE’s comment and addressed them within Chapter 7 of the ES. No significant effects to human health are identified.</p> <p>A stack sensitivity analysis has been completed to provide an optimised stack height to adequately disperse emissions (Appendix C.2, Document Reference 6.3). The stack height has been chosen in accordance with EA requirements. In addition, the location of the stacks in relation to buildings has also been carefully considered where they can influence the dispersion of pollutants.</p> <p>Furthermore, the operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency.</p>
Local Community	09.05.2018	29.05.2018	I support turning waste into renewable energy and the idea of utilising one site for multiple energy source conversion.	N	The Applicant has noted this response.

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Local Community	09.05.2018	29.05.2018	I fully support the use of renewable energy generation for London.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Renewable energy should be made more affordable so that the roof spaces of buildings already in existence and those yet to be built can be used to generate renewable energy.	N	The Applicant has noted this response However, this is not a question for this scheme. The Applicant has sought to maximise the use of solar panel provision in the Proposed Development.
Local Community	09.05.2018	29.05.2018	I am happy for utilising wind, water and sun for energy.	N	REP combines a number of elements to generate renewable energy and to secure energy supply as recognised in National Planning Statement EN1 including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage.
Local Community	09.05.2018	29.05.2018	I am all in favour of maximising reliable energy for London and UK.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Of course greater use should be made of e.g wind and sun energy	N	REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage. .
Local Community	09.05.2018	29.05.2018	Yes I support maximising reliable, renewable energy, but only a fraction of your proposal delivers this. Burning waste is NOT renewable.	N	REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage. The Project and its Benefits Statement (Document Reference 7.2) outlines REPs contribution to supplying renewable energy.
Local Community	09.05.2018	29.05.2018	This new “park” is not a contribution to a genuine recyclable economy which is circular not linear and does not rely on the incineration of non-recyclable materials. Should we one day achieve something approaching a genuinely renewable economy your	N	REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			<p>incinerator and “park” will be completely outdated and seen even more as the monstrosities they are - however much you try to reassure with vague promises of solar energy (which will no doubt produce a tiny fraction of the energy generated) and “energy recovery”. In short, your assertion that you are contributing to “reliable renewable energy generation” is at best disingenuous and at worst deliberately misleading.</p>		<p>Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage The Applicant has sought to maximise complimentary renewable energy generating capacity in the Proposed Development.</p> <p>The Proposed Development will include an Anaerobic Digestion Facility which will accept green and food waste. Anaerobic digestion has been recognised as one of the best methods for food recycling and as such will help contribute towards the zero biodegradable or recyclable waste being sent to landfills target, as well as helping contribute towards the Mayor’s 2030 municipal recycling targets and provide an ‘in borough’ Anaerobic Digestion solution for London Borough of Bexley preventing carbon intensive mileage of existing solutions. Outputs from the Anaerobic Digestion Facility may also be used as a fuel in the ERF to generate electricity or transferred off-site for use as a fertiliser in the agricultural sector.</p> <p>Furthermore, despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from landfill. REP will be a suitable alternative to help treat London’s waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, it is important to note, that the</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor’s recycling aspirations. In addition, REP will contribute towards generating low-carbon renewable energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution Control Residue for use in the construction sector. Both are important elements of the Circular Economy.</p> <p>As such, the Proposed Development will support the waste hierarchy principles, will make best use of the residual waste arising in London, enabling the Circular Economy to be realised and contribute to making significant progress to London achieving status as a zero carbon city.</p> <p>Further details are provided in the Project and its Benefits Report (Document Reference 7.2).</p>
Local Community	09.05.2018	29.05.2018	Our position is that: We support the reduce, re-use, recycle hierarchy, and wish to see the UK honour its Aichi convention on the conservation of biodiversity commitment to bring resource consumption down to a sustainable level by 2020. That means shifting from a three planet to a one planet economy, with a concomitant and significant reduction in ‘waste’. We wish to see the UK move rapidly towards a modern, circular, zero waste economy in which non-recyclable materials are no longer produced and incineration is	N	<p>The Proposed Development will support the waste hierarchy principles, will make best use of the residual waste arising in London, enabling the Circular Economy to be realised and contribute to making significant progress to London achieving status as a zero carbon city.</p> <p>REP will contribute towards generating low-carbon renewable energy in London from</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			ended and everything is made for long life, ease of repair and is then re-used, recycled or composted.		the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution Control Residue for use in the construction sector. Both are important elements of the Circular Economy. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).
Question 5: Are the social, environmental and economic factors that we have identified the right ones to take into consideration in finalising our proposals for an integrated Energy Park?					
Local Community	09.05.2018	29.05.2018	From the presentation of the consultation, Cory has taken careful consideration in the social, environmental & economic factors. I would like to further suggest that to provide some of the proposed job opportunities to be given to the local residents. As this will improve the economic prospects of the area.	N	The Applicant has noted this response. The Applicant employs 365 people across London and expects the Proposed Development to create a further c. 85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. The Proposed Development will require a workforce in excess of 6,000 people over the construction period. These job opportunities will be advertised to the local community, however precise percentage commitments cannot be confirmed at this time.
Local Community	09.05.2018	29.05.2018	Yes, although I have personally did not see any references to the impact on any wildlife population in the area	N	The Applicant provided additional information in relation to the impact on terrestrial biodiversity at the statutory section 47 local community exhibitions which were presented in the PEIR and on the Summer 2018 Consultation Panels (see Appendix I.9 of the consultation Report, Document Reference 5.1) on display at the statutory public exhibitions.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified.
Local Community	09.05.2018	29.05.2018	Ok, the incinerator has worked fine and local fears in the past have been dispelled	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	It would be good to see Cory make a commitment to ensure a percentage of the new jobs created go to people living closet to the new facility – so they benefit most from having something like this in their back garden. E.g. 15% from 3 miles. 25% from 5 miles	N	The Applicant has noted this response. The Applicant employs 365 people across London and expects the Proposed Development to create a further c. 85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. The Proposed Development will require a workforce in excess of 6,000 people over the construction period. These job opportunities will be advertised to the local community. Cory has a strong preference to recruit locally, wherever possible, however precise percentage cannot be confirmed at this time.
Local Community	09.05.2018	29.05.2018	Yes – although I believe there may be peregrine falcons in the area I wondered if nesting areas etc, would be factored into the design.	N	Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified. An Outline Biodiversity and

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas, including any nesting birds.</p> <p>Peregrine falcons (<i>Falco peregrinus</i>) were observed flying over the REP site on occasion, with the tall structure of the existing Riverside Resource Recovery Facility (RRRF) building providing potential hunting perches and possibly nesting opportunities for this species. Consideration regarding incorporating a nesting platform for the peregrines within REP is discussed in the Outline BLMS.</p>
Local Community	09.05.2018	29.05.2018	Yes. My concern is the overall impact of all the stacks that will be present. However, I have concerns most of the vapour blows north or north east. The prevailing winds blow from the south, south west or east for the main part.	N	<p>Chapter 7 of the ES (Document Reference 6.1) presents the findings from the air quality assessment undertaken for the Proposed Development. The air quality assessment has shown that the Proposed Development will not result in any likely significant environmental effects following the implementation of mitigation measures discussed. As the combustion emissions from the Anaerobic Digestion facility and ERF are exhausted through stacks of different orders of magnitude in height, they have been modelled separately. Additional information on the stack modelling is</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					provided in Appendix C.2 of the ES (Document Reference 6.3).
Local Community	09.05.2018	29.05.2018	Yes although I would like to see much environmental work	N	<p>The preliminary findings of the environmental assessments were presented in the PEIR, which was available at the section 47 public exhibitions, and during the statutory consultation period.</p> <p>An EIA has been undertaken assessing both the Proposed Development’s impact and the cumulative impact of the Proposed Development and other committed developments in the study area – see Chapter 4 of the ES (Document Reference 6.1).</p> <p>The final findings of the EIA are contained within the ES that accompanies the REP DCO application (Document Reference 6.1).</p>
Local Community	09.05.2018	29.05.2018	You can’t please all of the people all the time	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Yes. The design for the plant I favour would be the stepped power plant building design 3	Y	<p>The Applicant has noted this response.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					massing whilst maximising solar generation and limiting visual impact.
Local Community	09.05.2018	29.05.2018	Wildlife issues are also important.	N	Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified.
Local Community	09.05.2018	29.05.2018	What would be the probability of the park expanding more? As it seems that it can't create energy for a vast area with the proposed plans, so if the project goes well, would you want to build on the local land more?	N	The DCO application includes all land needed for the Proposed Development including any areas needed temporarily to facilitate construction, and the areas needed to install the electrical connection to the existing electricity distribution network (see the Land Plans (Document Reference 2.1)). Cory currently have no plans to expand on their site beyond that included within the current Application.
Local Community	09.05.2018	29.05.2018	There clearly needs to be benefits to the local community and it seems provision of energy might achieve this but given more intrusive buildings encroaching on the skyline some other compensation ought to be considered. Compensation in the form of guaranteeing remaining open spaces - probably a discussion with Bexley Council is required. Economic factors must not ride rough shod over habitat and wildlife needs therefore the building infrastructure (design – not shadowing/impacting on surrounding habitats, lighting that doesn't impact on nocturnal	Y	The Planning Statement (Document Reference 7.1) states that, on balance, the likely benefits of the Proposed Development outweigh any potential adverse impacts of the Proposed Development. These benefits include, amongst others: removing vehicles from London's roads through using river transport, providing environmental mitigation and enhancement, local and regional economic benefits and the

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			<p>creatures (owls/bats) nesting sites,); surrounding landscaping (planting etc.) must take account of this and if some of the energy predictions have to be surrendered to make provision for wildlife then so be it.</p>		<p>considerable public benefit to meeting the national need for new renewable/low carbon electricity supply and storage.</p> <p>Further details on the benefits of the Proposed Development are provided in the Project and its Benefits Report (Document Reference 7.2).</p> <p>Furthermore, the Applicant has engaged with the London Borough of Bexley throughout the pre-application and is continuing a level of engagement post submission of the REP DCO application.</p> <p>A full Townscape and Visual Impact Assessment (TVIA) has been undertaken and the findings are presented in Chapter 9 of the ES (Document Reference 6.1). The TVIA presents the effects on the townscape features and character of the Application Site, and the townscape character of the study area and also provides an assessment of effects on people’s views and visual amenity arising from the construction, operation and decommissioning of the Proposed Development. This has identified both adverse and beneficial likely significant effects from the construction, operation and decommissioning of REP. More details are provided in Chapter 9 of the ES (Document Reference 6.1).</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p> <p>Furthermore, an Outline Lighting Strategy (Appendix K.3 of Chapter 15 the ES (Document Reference 6.3), has been produced which establishes the minimum lighting levels required to construct and operate a safe, secure and energy efficient development, assesses the potential effects of exterior lighting required for REP on light sensitive receptors, and establishes design objectives for the lighting design to minimise the effects or obtrusive light to within guideline levels. Sections 11.8 and 11.9 of the ES set out the potential effects of artificial lighting on light sensitive species. Chapter 11 of the ES concludes that the impacts on designated habitats and species would be Minor significant or Not Significant.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	<p>1st economic and social factor is the building of the site (I assume that you will try to use local labour?) If this is the case it in itself will improve the lives of the people in the area.</p> <p>Then there are long term benefits to be considered, job opportunities and less pollution of our land and waters. Fully support your idea.</p>	N	<p>An EIA has been undertaken and the findings are presented within the ES (Document Reference 6.1). The ES includes an assessment of the likely socio-economic effects from the Proposed Development (see Chapter 14 of the ES) and potential impacts on terrestrial biodiversity (see Chapter 11 of the ES) and water resources (see Chapter 12 of the ES). All of which have concluded that effects associated with REP range from slight/moderate beneficial and significant to negligible and not significant.</p> <p>Furthermore, the Applicant employs 365 people across London and expects the Proposed Development to create a further c. 85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. The Proposed Development will require a workforce in excess of 6,000 people over the construction period. These job opportunities will be advertised to the local community. Cory has a strong preference to recruit locally wherever practicable.</p>
Local Community	09.05.2018	29.05.2018	<p>No account has been taken to balance wildlife needs against energy needs e.g. the inclusion of green roof spaces. There are of course other factors such as lighting impacts on the nature reserve affecting nocturnal species present such as Barn Owls and bat species; shading out of adjacent water vole-populated ditches etc. We believe that the land has to be shared between humans and wildlife and that insufficient</p>	Y	<p>Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. This also considered possible impacts resulting from</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			consideration has been given to wildlife verses financial gain.		<p>lighting. No likely significant residual effects have been identified.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p> <p>An outline Lighting Strategy has been submitted as part of this application (Appendix K.3 of Chapter 15 the ES (Document Reference 6.3), which sets out the principles to mitigate potential effects that could arise from external artificial lighting associated with the Proposed Development. A final lighting design will be developed in accordance with the principles at detailed design stage.</p> <p>Green roofs have been considered as part of development of the design. However, using the roofs to maximise solar power generation has been prioritised with biodiversity enhancement and mitigation managed through other solutions.</p>
Local Community	09.05.2018	29.05.2018	You say that the plant is sealed so no refuse, odours, gasses or dust particles can escape. You also state that the containers are sealed which are delivered mostly by barge. However in the warmer months of the year when waste turnover is backlogged the	N	The RRRF has a negative air pressure system in the Tipping Hall with air then fed into the combustion process. No odour complaints have been received at the RRRF since it became operational in 2011.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			<p>containers may sit on the river baking in the sun or may sit on site. These containers WILL produce odours sitting in the sun and we are already impacted enough by the Thames Water Plant nasty odours as is. I also have concerns about the transfer of the toxic ashes to another site. That ashes can get into the environment during transfer. You state that breeze blocks are made from these ashes. Have these been tested that they are turning toxic in the long run? Or like similar ones made from mining sludge which are now crumbling away? I do not think the wind, water and sun energy have been sufficiently utilised in this area.</p>		<p>The Energy Park will use the same approach to mitigation.</p> <p>For RRRF, waste is delivered to the facility and Incinerator Bottom Ash is transferred following processing by river to the Port of Tilbury for treatment in sealed containers. As such, no odour is emitted during this process, and there is no possibility of ash being released to the environment. REP will use the same approach.</p> <p>Incinerator Bottom Ash is widely used in construction projects and replaces primary won aggregates. The IBA is thoroughly tested prior to being sold as a product. In 2016, 190,000 tonnes of metal was recycled from IBA in the UK and 2 million tonnes of virgin construction aggregate was replaced by recycled IBA.</p> <p>The reprocessing of incinerator bottom ash (IBA) and air pollution control residue (APCR) into recycled aggregate is contracted out by Cory Riverside Energy.</p> <p>REP combines a number of elements to generate renewable energy and to secure energy supply as recognised in National Planning Statement EN-1 including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage.</p>
Local Community	09.05.2018	29.05.2018	I don't think you are giving anywhere near enough details for a public consultation, all I see is empty	N	

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			<p>words that don't address the issues of Traffic, Pollution, Malodorous Emissions (we have enough of those from the water works thanks), or even a proposed map showing the public footpaths and how they will be affected, not to mention the nature reserve?</p>		<p>The purpose of the non-statutory consultation was to provide introductory details about the Proposed Development with further detailed information provided in the statutory consultation as the project progressed. The Applicant has always striven to provide an appropriate level of details throughout the consultation process to inform local people and stakeholders and enable responses to be provided. This has been done to provide a proportionate, effective and complaint consultation, as explained in the Consultation Report (Document Reference 5.1).</p> <p>As set out in Section 8.6 of the Consultation Report the responses received during the non-statutory consultation informed the information presented at the statutory public exhibitions. The preliminary findings of potential effects during the construction phase were presented in the PEIR published during the statutory consultation. The PEIR was available at the section 47 public exhibitions. This included assessments on transport, air quality and terrestrial biodiversity.</p> <p>The final findings of the EIA covering each of the topics noted in this comment are contained within the ES (Document Reference 6.1) that accompanies the DCO application.</p>

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					<p>No permanent closures or diversions of Public Rights of Way (PRoW) will be required. Temporary diversions may be required during the construction phase. The PRoW that may be temporarily diverted are shown on the Access and Rights of Way Plans (Document Reference 2.3) and listed in Schedule 5 of the draft DCO (Document Reference 3.1).</p> <p>Chapter 11 of the ES (Document Reference 6.1) details the assessment of likely significant effects on terrestrial biodiversity, and mitigation measures that will be employed to minimise impacts on Crossness Local Nature Reserve (LNR). No likely significant residual effects have been identified.</p>
Local Community	09.05.2018	29.05.2018	In terms of the proposed building designs, I think Option 1 should be disregarded due to its large size and stack height. We have enough big ugly boxes in the areas without another one, especially with this particular one fronting the river. I think there needs to be more consideration to the visual impacts than this.	Y	The findings of an EIA are contained within the ES (Document Reference 6.1) that accompanies the REP DCO application. A full Townscape and Visual Impact Assessment (TVIA) has been undertaken and the findings are presented in Chapter 9 of the ES (Document Reference 6.1). The TVIA presents the effects on the townscape features and character of the Application Site, and the townscape character of the study area and also provides an assessment of effects on people’s views and visual amenity arising from the construction, operation and decommissioning of the Proposed Development.

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					<p>Embedded mitigation is provided by the Design Principles (Document Reference 7.4) detailing the design process of materials selection and Context Colour Palettes to integrate the development into the context of its surroundings.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>
Local Community	09.05.2018	29.05.2018	The social, environmental and economic factors you have identified are clearly NOT the right ones to consider. What you propose would have a huge impact on the environment of the local area.	N	<p>The social, environmental and economic factors identified for comment during the non-statutory consultation were those which the Applicant considered most relevant in light of the potential impacts of the Proposed Development and the matters of most concern to the local community.</p> <p>The findings of the EIA presented in the Environment Statement which accompanies the Application (Document Reference 6.1) considers all potential impacts on the</p>

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					environment and the local area in compliance with the requirements of applicable legislation and guidance.
Question 6: Is there anything that you want to make sure we consider as part of our proposals					
Local Community	09.05.2018	29.05.2018	<p>Your proposed plans, would they impact on access to the river?</p> <p>I would be interested in terms of the unemployed opportunities of 85 jobs you mentioned to go to the local people. I currently work for a local youth charity called Active Horizons. We help young unemployed people get back into training and employment. Would there be opportunity to engage with Cory in helping prepare young people for jobs coming up. Please could you get in touch with my details below</p>	N	<p>The Applicant notes this response.</p> <p>The Proposed Development would not permanently impact access to the river. Any streets which will be temporarily closed or diverted are listed in Schedule 5 of the draft Development Consent Order (DCO) (Document Reference 3.1) and shown in the Access and Rights and Way Plans (Document Reference 2.3).</p> <p>The Applicant is committed to generating local economic benefit from the Proposed Development and has a preference to recruit locally where possible</p>
Local Community	09.05.2018	29.05.2018	Consider a slanted roof to new building to maximise solar light to the south	N	<p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>

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					A slanted roof would have similar issues with regards to maximising solar generation as would be experienced with the curved option, with the added disadvantage, that its angle would mean that it would only correctly positioned to generate energy for part of the day.
Local Community	09.05.2018	29.05.2018	Using as little lorry traffic as possible as Erith has been badly treated by the building of Bronze Age Way. The river has in the past been a very valued asset and it should be treated again as a great advantage for transport	N	The Applicant has noted this comment. As set out in Chapter 6 of the ES (Document Reference 6.1), it is proposed that REP would normally operate on a balanced basis with waste being delivered by road and river. The Applicant is keen to maximise the use of its existing infrastructure, which would significantly reduce the movement of goods vehicles on London’s road associated with the movement of waste to REP.
Local Community	09.05.2018	29.05.2018	Covered it all really, was concerned about Nature reserve – You’ve solved that.	N	The Applicant has noted this comment. The final findings of the assessment of likely significant effects on terrestrial biodiversity are contained within Chapter 11 of the ES (Document Reference 6.1). No likely significant residual effects on designated areas, such as Crossness LNR, have been identified. Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6).

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Local Community	09.05.2018	29.05.2018	I want you to contact me for the possibility of having this system in Nigeria. Particularly in our state when electricity supply is erratic	N	The Applicant has noted this response. Cory also discussed this matter at the public exhibition with the consultee.
Local Community	09.05.2018	29.05.2018	Impact on the crossness nature reserve. The building option 3 seems best for that.	Y	<p>The Applicant has noted this response. The preliminary findings of the assessment of likely significant effects on terrestrial biodiversity were presented in the PEIR, which was available at the section 47 public exhibitions. The final findings are contained within Chapter 11 of the ES (Document Reference 6.1) that accompanies the REP DCO application.</p> <p>No likely significant residual effects on designated areas, such as Crossness LNR, have been identified. Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6).</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces</p>

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					massing whilst maximising solar generation and limiting visual and ecological impact.
Local Community	09.05.2018	29.05.2018	Overall I am happy with the proposal	N	The Applicant has noted this comment.
Local Community	09.05.2018	29.05.2018	To really make the facility a real "energy" park: 1) Wind turbines (even if building mounted only to supplement the facility's own power requirements) 2) Tidal energy turbine under/adjacent to the jetty – in a safe & practical location.	N	The Applicant has undertaken extensive reviews of the suitability of incorporating various renewable and/or low carbon energy generation technologies at the REP site. Due to site constraints, it wind turbines or tidal energy would not have been feasible and viable at the REP site. Further details about the consideration of technology choice for the Proposed Development are provided in the Project and its Benefits Report (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	Public trips sound interesting – and ain't something that I am aware of (perhaps Crossness and Cory could each advise each other and both open to public). I wondered if there were any evening open days i.e. for guide design etc.	N	<p>The Applicant held open days at the existing RRRF for the local community between 10th-11th April 2018. The Applicant would be open to hosting additional open days as the REP DCO application progresses. Additional information about the Proposed Development was provided at the public exhibition events during both non-statutory and statutory consultation. This included events during evening hours (see details below of events held at those times):</p> <p>Non-statutory exhibitions were held between 22nd and 25th May at:</p> <ul style="list-style-type: none"> • Belvedere Community Centre (23rd May 16.00 – 20.00); and <p>For the section 47 statutory consultation, as publicised in the section 48 notices,</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>exhibitions were held at the following locations:</p> <ul style="list-style-type: none"> • Belvedere Community Centre (12th July 2018 – 16.00 – 20.00); • Slade Green and Howbury Community Centre (6th July 2018 and 10th July 2018 – 16.00 – 20.00); <p>Further details about the public exhibitions held is provided in Section 3 and Section 7 of the Consultation Report (Document Reference 5.1)</p>
Local Community	09.05.2018	29.05.2018	The safe removal of the ash.	N	<p>The Applicant has noted this comment. Chapter 3 of the ES (Document Reference 6.1) includes a description of the Proposed Development and its operation, including a description of the removal of bi-products such as ash. This has been inherently considered as part of the EIA and the assessments presented in the ES.</p> <p>Cory’s existing RRRF has been operating successfully, including the safe removal and recycling of Incinerator Bottom Ash, since 2011.</p>
Local Community	09.05.2018	29.05.2018	<p>To take children on board at all levels who will ‘educate’ their parents. Simple books in libraries, similar to a ‘Rubbish’ book already written, with pictures. Groups to schools. Your message into the Bexley Quarterly Mag. - local shops - Job centres for Apprenticeship schemes</p>	N	<p>The Applicant has noted this comment and has used various methods to inform the local community about the Proposed Development and upcoming consultation events. Advertising methods were as follows:</p> <ul style="list-style-type: none"> • Online article in the Bexley News Shopper;

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<ul style="list-style-type: none"> • Posters displayed at local community venues; • Information leaflets distributed to local residents in the consultation zone; • Newspaper articles in the Bexley News Shopper; • Site visits at RRRF; • Press release of the Applicant’s website; • Postcards with details of non-statutory public exhibitions distributed to local residents in the consultation zone; and • Twitter posts. <p>The Applicant regularly engages with the local community including open days, engagement with schools and via regular attendance at the Bexley Community Forum. This will continue once REP is developed.</p>
Local Community	09.05.2018	29.05.2018	Air quality, environmental impact, leisure facility, benefits to local community.	N	<p>The preliminary findings of environmental assessments were presented in the PEIR, which was available at the section 47 public exhibitions.</p> <p>The final findings are contained within the ES that accompanies the REP DCO application (Document Reference 6.1). Chapter 7 of the ES presents the findings from the air quality assessment and Chapter 14 of the ES presents the findings from the socio-economics assessment. No</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					likely significant effects were identified for these chapters. The Project and its Benefits Report (Document Reference 7.2), outlines the benefits of REP.
Local Community	09.05.2018	29.05.2018	Yes – the impact of the energy cable on the road systems to the bridge. Poor access would cut us off from the best route to M25 north	N	The preliminary findings of environmental assessments were presented in the PEIR, which was available at the section 47 public exhibitions. This included the preliminary findings of the assessment of likely significant traffic and transport effects arising from the Proposed Development. The final findings are contained within Chapter 6 of the ES (Document Reference 6.1) and the Transport Assessment (Appendix B.1, Document Reference 6.3) that accompanies the REP DCO application. Both consider the likely effects from the construction of the Electrical Connection. A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix B.1 (Document Reference 6.3)) has been submitted with the DCO application.
Local Community	09.05.2018	29.05.2018	Yes, more environmental work, planting trees which soften up and extending the nature reserve. A site a small way from the plant that would promote local	Y	The preliminary findings of environmental assessments were presented in the PEIR, which was available at the section 47 public

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			wildlife and introduce native plants to the area would be a great benefit.		<p>exhibitions. This included a Townscape and Visual Impacts Assessment (TVIA) and an assessment on the likely effects on terrestrial biodiversity from the Proposed Development.</p> <p>The final findings are contained within Chapters 9 and 11 of the ES (Document Reference 6.1) that accompanies the REP DCO application. An Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has also been produced which includes all ecological mitigation measures and opportunities to provide enhancements, including planting where appropriate. Additionally, the Design and Access Statement (Document Reference 7.3) and Design Principles (Document Reference 7.4) set out design principles of the Proposed Development and how the design will be sympathetic to the existing landscape.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. Opportunities for appropriate enhancement in and around the development will be sought.</p>
Local Community	09.05.2018	29.05.2018	We think you have got it all covered.	N	The Applicant has noted this response.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	Keeping disruption to traffic a residential areas to a minimum whilst installing the high voltage feeder cable to Littlebrook power station.	N	<p>The Applicant has noted this response.</p> <p>The Applicant has carried out an assessment of the impact of construction of the Proposed Development on the environment and the local community, including considering the potential for disruption to traffic on local roads. The final findings of that assessment are contained within Chapter 6 of the ES (Document Reference 6.1) and the Transport Assessment (Appendix B.1, Document Reference 6.3) that accompanies the REP DCO application. Both consider the likely effects from the construction of the Electrical Connection. A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix B.1 (Document Reference 6.3)) has been submitted with the DCO application.</p>
Local Community	09.05.2018	29.05.2018	Please consider green roofs for wildlife. Also the effect of light on nocturnal species such as Barn Owls and Bats.	N	<p>The Applicant has noted this response. Chapter 11 of the ES (Document Reference 6.1) sets out the potential effects of artificial lighting on light sensitive species. No residual likely significant effects were identified.</p> <p>An outline Lighting Strategy has been submitted as part of this application (Appendix K.3 of Chapter 15 of the ES (Document Reference 6.3), which sets out</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>the principles to mitigate potential effects that could arise from external artificial lighting associated with the Proposed Development. A final lighting design will be developed in accordance with the principles at the detailed design stage.</p> <p>Green roofs have been considered as part of development of the design however, using the roofs to maximise solar power generation has been prioritised with biodiversity enhancement and mitigation managed through other solutions.</p>
Local Community	09.05.2018	29.05.2018	<p>Open Spaces, green open spaces, nature are proven to be good for the health (physical and mental) of the population. Government and Local Authorities have responsibilities - as should commerce and business. It is therefore essential that the many recognised factors for improving bio-diversity in the built environment must be employed in this project. The building design must take this into account.</p> <p>I understand the optimum design would be a single "box" type unit allowing maximum solar panels - this would be ugly, overly intrusive, be detrimental to surrounding habitats and make no allowance for provision of green/brown roofs/walls. It is stated that Indicative design 1 (Ugly box) would provide energy for c1100 homes, design 2 (curved roof) c550 homes and design 3 (stepped box) c900 homes. There are already enough ugly boxes of varying shapes along the river Thames - the innovative and more "attractive" curved designs of Riverside 1 and Thames Water Incinerator are more pleasing on the eye and your design 2 fits nicely in with this. I appreciate a curved</p>	Y	<p>The Applicant has noted this response. An Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has been produced and accompanies the REP DCO application. The outline BLMS includes all ecological mitigation measures and opportunities to provide enhancements. Furthermore, the Design Principles (Document Reference 7.4) set out the Design Principles for the Proposed Development. The Design Principles state that the proposed landscaping will be sympathetically integrated into the existing RRRF landscape masterplan and the soft landscaping should protect and enhance biodiversity.</p> <p>The Applicant has had regard to the consultation feedback received during the non-statutory and statutory consultation and has developed its design proposals in</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			building might be more costly in construction and provide less (no?) space for solar panels. It is time developers/local authorities not only considered the human/economic aspects of design/energy provision and made some compromises to balance the long term needs of the natural environment (wildlife, nature, habitats).		<p>response to the feedback received. The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>
Local Community	09.05.2018	29.05.2018	<p>Air quality is a primary concern based on the local percentage of respiratory related illnesses in the area.</p> <p>I would like to see investment in green space as part of the design proposal.</p> <p>I'd also like local schools to have talks from Cory on the benefits of recycling and the technology that will make the new site an environmental success.</p>	N	<p>Chapter 7 of the ES (Document Reference 6.1) concludes that the effects of air quality on human health during the construction and operation of the Proposed Development will be Not Significant. A Health Impact Assessment (Appendix K.1, Document Reference 6.3) has also been produced for the REP DCO application.</p> <p>Furthermore, the Applicant consulted with Public Health England (PHE) under section 42 of the Planning Act. PHE commented on the PEIR findings and were satisfied with the proposed methodology. The air quality assessment also had regard to PHE's comment and addressed them within Chapter 7 of the ES.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>The Applicant regularly engages with the local community as schools and via the local community forum.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. Opportunities for appropriate enhancement in and around the development will be sought.</p>
Local Community	09.05.2018	29.05.2018	Environmentally, I have no concerns about the impact of the project.	N	The Applicant has noted this comment.
Local Community	09.05.2018	29.05.2018	I would request that great care is taken when working in the nature reserve to ensure that no damage is done to the habitats there and the wildlife within. I would favour the maximum use of solar panels on the roof of the new building in order to ensure the maximum generation of renewable energy.	Y	<p>The Applicant has noted this comment.</p> <p>No likely significant residual effects on designated areas, such as Crossness LNR, have been identified. Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6).</p> <p>The preferred building form provides embedded mitigation for visual effects, including from Crossness LNR. The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	We are concerned about the negative impact of the proximity to the nature reserve and the aesthetics of it. With development being granted on all sides of the nature reserve in recent years, it is being continually squeezed and feeling more and more hemmed in, losing the open feel of typical marshland habitat. This is going to be a huge imposing construction and will sit right on the reserve's boundary.	Y	<p>Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as a result of the Proposed Development. No likely significant residual effects have been identified. Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6).</p> <p>As set out in Chapter 9 and the Design Principles document (Document Reference 7.4) the preferred stepped building form provides embedded mitigation for visual effects, including from Crossness LNR.</p> <p>A full Townscape and Visual Impact Assessment (TVIA) has been undertaken and the findings are presented in Chapter 9 of the ES (Document Reference 6.1). The TVIA presents the effects on the townscape features and character of the Application Site, and the townscape character of the study area and also provides an assessment of effects on people’s views and visual amenity arising from the construction, operation and decommissioning of the Proposed</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					Development. This has identified both adverse and beneficial likely significant effects from the construction, operation and decommissioning of REP. More details are provided in Chapter 9 of the ES (Document Reference 6.1).
Local Community	09.05.2018	29.05.2018	<p>I do not think the wind, water and sun energy have been sufficiently utilised in this area. There is plenty of up-scope. Feeding hot water into pipes is a great idea however this type of energy access has been reduced or been removed from this area. I doubt very much that any new buildings in the future are going to utilise this energy due to the sheer distance from the plant. This plant will also have a negative impact on the house prices in the area. In particular Thamesmead as all the negative industrial activity does impact us here. Would we get a reduction on Council Tax to offset future losses in property values?</p> <p>Potentially 75 jobs compared to tens of thousands impact health wise is just not good enough and justifiable. The lorries will impact our roads which are already struggling at this time. London is growing and so is the amount of waste produced. This is a good thing for you but bad for the environment and bad for us living next to it.</p>	N	<p>REP combines a number of elements to generate renewable energy and to secure energy supply as recognised in National Planning Statement EN-1 including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage. Further details about the consideration of technology choice for the Proposed Development are provided in the Project and its Benefits Report (Document Reference 7.2).</p> <p>A Combined Heat and Power (CHP) feasibility study has been undertaken and provided with the DCO application (Document Reference 5.4), which concludes: <i>‘Subject to technical and economic feasibility, a heat supply system will be included to export up to 30 MWt of heat to offsite consumers. Design proposals indicate that the REP ERF would be capable of delivering hot water at up to 100°C via low pressure steam extraction from the steam turbine, and sufficient space has been safeguarded within the Application Site for the installation of the</i></p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p><i>required infrastructure to achieve the maximum heat export capacity.’</i></p> <p>There is no evidence to support a link between energy generation development and a decline in property prices. The location is considered highly suitable as it maximises the use of the River Thames and existing infrastructure.</p> <p>Chapter 7 of the ES (Document Reference 6.1) concludes that the effects of air quality on human health during the construction and operation of the Proposed Development will be Not Significant. A Health Impacts Assessment (Appendix K.1, Document Reference 6.3) has also been produced for the REP DCO application.</p> <p>The Transport Assessment (TA) (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1) consider the impacts on transport during construction and operation.</p> <p>An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) and an Outline CTMP (Appendix B.1 (Document Reference 6.3)) have been prepared and submitted with the DCO application, which provide a framework for detailed management plans to be prepared at detailed design stage, in order to minimise and mitigate any impacts and/or disruption</p>

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					<p>that may arise during the construction phase.</p> <p>REP will make extensive use of the River Thames for transporting waste and ash. By using the river to transport the majority of waste to REP, the Applicant expects to remove around 80,000 further lorry journeys from London’s road network each year.</p>
Local Community	09.05.2018	29.05.2018	As a member of the Friends of Crossness I am very keen that any effect on the nature reserve is kept to the minimum preferring the use of the 'wave' type roof but accept that solar panels are probably the most effective for producing power.	N	<p>The Applicant has noted this response. The Applicant has ongoing dialogue with the Friends of Crossness and has engaged throughout the pre-application process as detailed in the Consultation Report (Document Reference 5.1).</p> <p>Chapter 11 of the ES details the assessment of likely significant effects on terrestrial biodiversity, and mitigation measures that will be employed to minimise impacts on Crossness Local Nature Reserve (LNR). No likely residual effects were identified.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual impact.
Local Community	09.05.2018	29.05.2018	Please consider the local ecology and environment very carefully especially bats and breeding birds.	N	Chapter 11 of the ES (Document Reference 6.1) presents the findings of the assessment of likely significant effects on terrestrial biodiversity. The assessment has considered the effects on various species, including; breeding birds, reptiles, invertebrates wintering birds, commuting and foraging bats and water voles.
Local Community	09.05.2018	29.05.2018	Residents would better understand if it was stated how many average family homes would benefit from the energy created. The energy must be clean, not be detrimental to air quality or create negative health impacts etc. It's also good to have comparative data - what's exact outputs / benefits / savings in other areas etc? how are surrounding areas affected? What would be the role / responsibility of Bexley / Royal Greenwich councils?	N	The proposed Energy Park will generate low carbon renewable electricity for the equivalent of c. 140,000 homes. This was stated on information panels made available on the website and at public exhibitions during both statutory and non-statutory consultation (see Appendices D.2 and I.4 of the Consultation Report (Document Reference 5.1)). The air quality assessment presented in Chapter 7 of the ES (Document Reference 6.1) has demonstrated that the Proposed Development will not result in any likely significant environmental effects on air quality, either as a standalone project or cumulatively with other projects. The potential impacts on human health as a result of the Proposed Development have been considered within Chapter 7 of the

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>ES (Document Reference 6.1) and the Health Impact Assessment (Appendix K.1, Document Reference 6.3). No significant effects on human health have been identified. Furthermore, the Applicant consulted with Public Health England (PHE) under section 42 of the Planning Act 2008. PHE commented on the PEIR and were satisfied with the proposed methodology. The air quality assessment also had regard to PHE’s response which informed the final assessment presented in Chapter 7 of the ES. The assessments undertaken within Chapters 7 and Appendix K.1 are not limited to the immediate area, and consider how surrounding areas are affected. These are included within the assessment outcomes described above.</p> <p>A CHP Study (Document Reference 5.4) has been submitted with the REP DCO application, which assesses the feasibility of supplying heat from REP to local heat consumers and provides details of how energy generated can be used. This demonstrates how REP could benefit surrounding areas not within the immediate vicinity.</p> <p>LBB are the host authority for the Proposed Development. The applicant will work with LBB post determination to finalise and approve future documents required through the DCO consent. The Royal Borough of</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					Greenwich would not be involved post determination.
Local Community	09.05.2018	29.05.2018	As a user of the adjacent nature reserve I am keen to see the minimum of disruption to the local wildlife. Wild areas and even parks are gradually being eroded in the Bexley area.	N	Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity, including at the Crossness Local Nature Reserve, and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified. Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6).
Local Community	09.05.2018	29.05.2018	The new facility will be right on the boundary of the reserve and therefore the building needs to be sympathetic to nocturnal flying species and avoid, as far as possible, unnecessary hemming in of the reserve. My preference is for a curved roof in keeping with the other nearby building. I appreciate this provides for less solar panels but there are many other roofs nearby on the other side of Norman Road that could be included to help with energy regeneration.	Y	Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity, including impacts on the Crossness Nature Reserve and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely significant residual effects have been identified. A full Townscape and Visual Impact Assessment (TVIA) has also been undertaken and the findings are presented in Chapter 9 of the ES (Document

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Reference 6.1). The TVIA presents the effects on the townscape features and character of the Application Site, and the townscape character of the study area and also provides an assessment of effects on people’s views and visual amenity arising from the construction, operation and decommissioning of the Proposed Development.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>
Local Community	09.05.2018	29.05.2018	My preferred option is the curved roof building. This is the most aesthetically pleasing design and more in keeping with the local landscape, since we have similar adjacent designs with the Thames Water Crossness SPG and the Riverside Resource Recovery Facility. I think any new buildings should be cohesive in design and fit into the existing landscape. Whilst this might reduce the amount of renewable	Y	The Applicant has had regard to the consultation feedback received during the non-statutory and statutory consultation and has amended its design proposals in response to the feedback received. The design and overall form of the building are considered in the Design and Access Statement (Document Reference 7.3).

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			<p>energy available, I think the local impacts are more important here. It is great to see renewable energy included in the plans, but essentially the purpose of the facility is to burn waste and any renewable energy is simply a bonus, so for me, reduced solar panels and subsequent energy is a fair compromise for something which fits into the local environment and appears less opposing to visitors of Crossness Nature Reserve.</p> <p>Perhaps you can look at providing directly for wildlife with the use of living roofs and green walls. Also take into consideration the impacts of bird flight paths as they exit the river at high tide and come into Crossness Nature Reserve to roost. Can the creation of lakes/ponds be built into the landscape design etc.</p>		<p>The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p> <p>The use of living roofs would prevent the ability to generate renewable energy in the form of the proposed solar photovoltaic installation across the Main REP Building. Soft landscaping on site will be sympathetically integrated into the existing RRRF landscape masterplan with the use of native and indigenous shrubs with wildflower grasses providing an information style planting suitable for the surrounding river and nature reserve areas.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (Document Reference 7.6) has been produced which outlines measures to mitigate ecological effects, as well as provide enhancements both within and outside REP.</p> <p>Whilst it has not been required to consider bird flight paths, Chapter 11 of the Environmental Statement (Document</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					Reference 6.1 (Terrestrial Biodiversity) considers the anticipated effects from the Proposed Development on wintering and breeding birds.
Local Community	09.05.2018	29.05.2018	Your site is right next to crossness nature reserve of which I am a member, I want you to be mindful of the impact your plans have on nature and insist that the needs of the nature reserve are taken into account at every stage of your planning (and building, I am aware that you will go ahead regardless of what the public thinks!).	N	<p>The Applicant has noted this response. The Applicant has engaged with the Friends of Crossness throughout the pre-application process as detailed in the Consultation Report (Document Reference 5.1). Impacts on Crossness Local Nature Reserve (LNR) have been considered throughout the Environmental Impact Assessment that has been undertaken for the Proposed Development, as report in the Environmental Statement (Document Reference 6.1).</p> <p>Chapter 11 of the ES details the assessment of likely significant effects on terrestrial biodiversity, and mitigation measures that will be employed to minimise impacts on Crossness Local Nature Reserve (LNR). No likely significant residual effects were identified.</p> <p>The Applicant has had regard to all consultation responses received throughout the consultation process in developing its proposals for the Proposed Development as set out Section 2 of the Consultation Report and Appendices J.1-J.4. Once the Application has been accepted by the Secretary of State, it will be examined by an independent panel of Inspectors, appointed</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					on behalf of the Secretary of State. Local people will have a further opportunity to make their views known at this stage. The Examining Authority will then make a recommendation to the Secretary of State, who will take the final decision on whether development consent should be granted for the Proposed Development.
Local Community	09.05.2018	29.05.2018	<p>Minimum disruption to the Reserve and its wildlife, both from the final form the “park” takes and any related cabling, should be your main priority. I’m amazed you need a public consultation to advise you of this but so be it. Thames Water has already polluted the protected area of the Reserve with such severity that it has been closed for nearly six months. If you take environmental concerns even remotely seriously you will not add to the already disastrous impact the owners of the Reserve themselves have had.</p> <p>As far as the final design of the “park” is concerned, information provided by Bexley Wildlife strongly supports the least visually imposing option which I understand is the sloped roof design of option 2.</p> <p>Consideration MUST be given to light pollution and added lorry traffic which, as I understand it (and despite your assertions that the river will be the main source of supply), will be a serious issue both during construction and after completion.</p> <p>As I understand it option 2 gives the smallest solar panel capacity so agreements with surrounding warehouses etc should be explored which would enable panels to be used on their inherently huge roof capacity. There should also be some consideration for</p>	Y	<p>An Environmental Impact Assessment has been undertaken and the findings are presented within the ES (Document Reference 6.1) that accompanies the REP DCO application. This includes an assessment on terrestrial biodiversity (see Chapter 11 of the ES) and transport (see Chapter 6 of the ES). Impacts on Crossness Local Nature Reserve (LNR) have been considered throughout the Environmental Impact Assessment that has been undertaken for the Proposed Development, as report in the Environmental Statement (Document Reference 6.1).</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			<p>green roofs to minimize disruption to wildlife - something which does not even appear to have been mentioned, let alone considered, on your literature.</p>		<p>Sections 11.8 and 11.9 of the ES (Document Reference 6.1) set out the potential effects of artificial lighting on light sensitive species. An outline Lighting Strategy has been submitted as part of this application (Appendix K.3 of Chapter 15 of the ES (Document Reference 6.3)), which sets out the principles to mitigate potential effects that could arise from external artificial lighting associated with the Proposed Development. No likely significant residual effects were identified. A final lighting design will be developed in accordance with the principles at detailed design stage.</p> <p>The Transport Assessment (Appendix B.1, Document Reference 6.3) has shown that the Proposed Development will not result in any likely significant environmental effects following appropriate mitigation, for both the construction and operation phases. An Outline CTMP (Appendix K of the Transport Assessment (TA) (Document Reference 6.3)) has been submitted with the DCO application and sets out how the delivery of materials and the routing of these vehicles to the Application Site will be managed and controlled. This will include movements by both road and river, with a focus on maximising the use of the river without causing adverse effects to the existing RRRF operation.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>The Applicant has had regard to the consultation feedback received during the non-statutory and statutory consultation and has amended its design proposals in response to the feedback received. The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application. The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3).</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact. Green roofs have been considered as part of development of the design. However, using the roofs to maximise solar power generation has been prioritised with biodiversity enhancement and mitigation managed through other solutions.</p>
Local Community	09.05.2018	29.05.2018	Irrespective of which design option gives the greatest solar panel capacity, can solar be retrofitted to the existing incinerator? Has Cory looked at the huge area of roof space on neighbouring ‘sheds’ and considered renting roof space to retrofit solar arrays on those as well, perhaps with a profit-sharing deal involved? If	Y	The Proposed Development comprises an integrated Energy Park including complementary energy generation equipment, which seeks to maximise the land holding. It would therefore not have been appropriate, as part of this application, to have explored options for retrofitting

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			<p>weight is an issue, are lightweight thin-film cells an option?</p> <p>Any 'laying down area' for construction materials and equipment must not encroach onto the Nature Reserve or other semi-natural/open mosaic habitat. Notwithstanding any other issues, given the continual erosion of what is physically still marshland, or geographically part of it, in the area (including thanks to Cory) and the general wildlife crisis in the UK, we expect to see Cory voluntarily offering significant 'mitigation' in its final proposal. This should include sustained funding for the Nature Reserve, for further wildlife improvements for the dykes in Thamesmead, living roof space on local buildings (we are still pushing for this in the Cory data centre, and perhaps Cory could look at funding retrofit on neighbouring shed roofs in line with our proposal about solar arrays – the two could readily go together) and for schemes to reduce waste and increase re-use of materials within Bexley and the Boroughs which send their refuse here.</p>		<p>solar panels to existing buildings that do not form part of this proposal.</p> <p>Cory has previously explored the use of solar panels on RRRF however its curved roof has made this technically and financially not viable.</p> <p>The temporary construction laydown areas are sited adjacent to but not within the Crossness LNR, as shown in Figure 3.1 of the ES (Document Reference 6.2) and therefore will not encroach on the LNR.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments.</p> <p>Options for offsetting will be determined to local biodiversity priorities, initially through discussion with the LBB and then with third party landowners.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Question 7: Do you have any comments on how the electrical connection route might affect you? (Different options are labelled 1, 1A, 2A and 2B. You can refer to the routes by these labels, use recognised road names or draw a sketch to tell us about a particular location)					
Local Community	09.05.2018	29.05.2018	Would the implementation of the electrical connections have major disruptions on traffic congestion etc.?	N	<p>Impacts associated with the construction of the Electrical Connection route have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1). No likely residual significant effects were identified and therefore major disruptions are not expected to result. UKPN propose to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network, however it is likely that single lane closure would be required to facilitate a safe working area or localised footway diversion. The scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.</p> <p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the constriction works to a minimum. An Outline CTMP (Appendix B.1) (Document Reference 6.3) has been submitted with the DCO application.</p>
Local Community	09.05.2018	29.05.2018	Do it as quick as possible minimise traffic hold up. 2A would probably be less disruptive to traffic in and out	N	The Applicant has noted this response.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			of London. This is my biggest concern about the proposal		<p>Impacts associated with the construction of the Electrical Connection route have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1). UKPN proposed to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network, however it is likely that single lane closure would be required to facilitate a safe working area or localised footway diversion. The scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.</p> <p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix B.1 (Document Reference 6.3)) has been submitted with the DCO application.</p> <p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	I would personally suggest Route 1	N	<p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					Development Consent Order to be granted on the basis of a single route.
Local Community	09.05.2018	29.05.2018	The junction of Bexley Rd and Fraser Rd is grid locked a high percentage of the day because of the effect of the narrow Victorian railway bridge, engineering works to install cables might make those roads unusable for months on end cause much disruption to bus routes and local residents lives	N	<p>Impacts associated with the construction of the Electrical Connection route have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1). UKPN proposed to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network, however it is likely that single lane closure would be required to facilitate a safe working area or localised footway diversion. The scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.</p> <p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix K of the Transport Assessment (TA) (Document Reference 6.3)) has been submitted with the DCO application.</p> <p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	Route 2A looks like it might cause more disruption to residents than route 1, which sticks to the main road	N	<p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>The construction of the Electrical Connection is anticipated to take place in phases, with approximately 300 m stretches of road being affected (for a 200m length of trench) for a period of typically 5-7 days at a time.</p>
Local Community	09.05.2018	29.05.2018	Whilst Route 2B passes closet to my community, the local disruption may reduce issues on the main roads, long delays on main road can significantly increase air pollution from the high numbers of HGV’s that use the roads	N	<p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Development Consent Order to be granted on the basis of a single route.</p> <p>Chapter 7 of the ES (Document Reference 6.1) considers the air quality effects from construction of the Electrical Connection. No significant residual effects have been identified.</p>
Local Community	09.05.2018	29.05.2018	As I live on Route 2, I am happy to support which ever route is most pragmatic over the lighting of the connection route.	N	<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>Lighting of the Electrical Connection will be temporary in nature to allow safe working during hours of darkness (particularly in the winter). Measures to control the use of temporary lighting during construction are set out in the Outline CoCP (Document Reference 7.5).</p>
Local Community	09.05.2018	29.05.2018	Magnetic and electrical fields have been associated with cot deaths in the past, concerned about any possible medical consequences caused	N	<p>The Applicant has noted this response. A Health Impact Assessment (HIA) (Appendix K.1, Document Reference 6.3) has been submitted alongside the REP DCO application and considers the potential positive and negative health and well-being impacts of the Proposed</p>

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					Development on residential communities. The HIA concludes: <i>'Based upon the findings of this assessment it is not anticipated that there will be significant effects to health as the Electrical Connection will be designed to enable EMFs to be within public exposure guideline levels and therefore no further mitigation is required.'</i>
Local Community	09.05.2018	29.05.2018	As above – Transport links are vital – this part of the proposal is vital to making sense of the project	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Route 1A preferred to keep disturbance to Nature Reserve to a minimum. Then on to route 1.	N	<p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	The norman road route would be less disruptive for the adjacent nature reserve.	N	<p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	I favour 1A (Norman Road) as there has previously been magnificent disturbance to the nature reserve for the cable that was lead along Footpath 2.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	The Crossness Nature reserve was severely disrupted during the installation of electrical connections for Riverside 1 and should not have to undergo such disruption again especially as many species are beginning to establish themselves - water vole to name but one. Therefore option 1A - Norman Road must be the option used.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the</p>

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					<p>Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	Living alongside route 2A and near to route 1A, my only concern would be about disruption during the construction period. Work on the A2016 can impact on the old road (High Street and West Street Erith) as vehicles already "rat-run" during peak times along a road with traffic calming measures in place.	N	<p>Impacts associated with the construction of the Electrical Connection route have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1). UKPN proposed to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network, however it is likely that single lane closure would be required to facilitate a safe working area or localised footway diversion. The scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.</p> <p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the</p>

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					constriction works to a minimum. An Outline CTMP (Appendix K of the Transport Assessment (TA) (Document Reference 6.3)) has been submitted with the DCO application.
Local Community	09.05.2018	29.05.2018	I do not know how the electrical installation might affect residents in bordering areas (SE2) but we already suffer from poor and easily interrupted TV signals for example. When the current incinerator was constructed, the power to it was created through the nature reserve. A high-power cable was laid along Public Footpath 2 from Belvedere Rd (now Bazalgette Way) south along the southern boundary of the works and reserve, and then up north towards the Thames and across Sea Wall Field. The trenching and laying of this cable was very disruptive and resulted in the current dead straight path that hugs the boundary of the sewage works, rather than the nice meandering path that existed previously. It appears that whatever is done would be destructive and disruptive to the reserve and its wildlife.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>The Proposed Development would not permanently close or divert any Public Rights of Way. Any streets which will be temporarily closed or diverted are listed in Schedule 5 of the draft Development Consent Order (DCO) (Document Reference 3.1) and shown in the Access and Rights and Way Plans (Document Reference 2.3).</p> <p>Chapter 11 of the ES (Document Reference 6.1) presents the findings from the assessment of impacts on terrestrial biodiversity and outlines any mitigation measures to reduce the likely significant effects on terrestrial biodiversity as result of the Proposed Development. No likely</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>significant residual effects have been identified.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas, including Crossness LNR.</p>
Local Community	09.05.2018	29.05.2018	I understand from the diagrams that the power cables could run along the western side of the reserve which I am totally against and would much prefer them to run along the side of Norman Road thus causing less upset to wildlife and fauna in the area.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p>

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					It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.
Local Community	09.05.2018	29.05.2018	I feel that option 1A would be the best option for the reserve. Option 3 the stepped building looks to be the preferred option from a wildlife perspective.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p>
Local Community	09.05.2018	29.05.2018	Also to avoid unnecessary impact on the nature reserve and its wildlife, the electrical connection route should be along Norman Road.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well</p>

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					<p>as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	<p>I am deeply opposed to any electrical connection routes which will go through, or have direct impacts on, the adjacent nature reserve. I would favour the Norman Road route. I would also be very saddened if proposed lay-down areas were areas that support important wildlife. The wildlife impacts of all these developments in such an ecologically sensitive area is catastrophic. These should be minimised as much as possible by using areas that do not have ecological interest.</p>	N	<p>The Applicant has noted this comment. The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity.). Residual effects are not anticipated to be significant on the Crossness Local Nature Reserve (LNR), following appropriate mitigation. Similarly, Chapter 11 assesses the impacts of use of the temporary lay down areas, and has no identified significant effects following appropriate mitigation.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas, including on the temporary construction laydown areas.</p>
Local Community	09.05.2018	29.05.2018	The cables MUST NOT run through the nature reserve or anywhere they would be disruptive to the wildlife.	N	The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible,

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Local Community	09.05.2018	29.05.2018	I understand it the existing incinerator’s cabling transformed what was once a meandering path through the Reserve into the dead straight one we currently have with accompanying huge disruption to wildlife during its grounding; any cabling should therefore bypass the Reserve completely and be laid in Norman Road.	N	The Proposed Development would not permanently close or divert any Public Rights of Way. Any streets which will be temporarily closed or diverted are listed in Schedule 5 of the draft Development Consent Order (DCO) (Document Reference 3.1) and shown in the Access and Rights and Way Plans (Document Reference 2.3).

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	To avoid further direct disruption to the Nature Reserve, we support the Norman Road cable routing option.	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
Question 9: Any other comments					
Local Community	09.05.2018	29.05.2018	I would be interested to engage with Cory through the charity I mentioned to help prepare local young people for the potential jobs coming up through the proposal. Thank you	N	The Applicant has noted this comment. It is expected that REP will create a further c. 85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. REP will also

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					require a workforce in excess of 6,000 people over the construction period which will be a benefit to the local economy and local community.
Local Community	09.05.2018	29.05.2018	There is an anomaly within the 3D Map of Trinity School, staff advised and will contact the mappers.	N	The Applicant can confirm that the 3D model used during the consultation events was for illustrative purposes only. This does not affect the accuracy of assessment within the ES (Document Reference 6.1).
Local Community	09.05.2018	29.05.2018	Please contact me on the possibility of having the same project in Nigeria	N	The Applicant has noted this comment.
Local Community	09.05.2018	29.05.2018	Of the three design options, I prefer the option on panel 14 – stepped roof → balances aesthetic & additional power generation through solar I would suggest a parapet wall on the side through to mutual a wall feature (like from panel 12) because it better matches the existing built landscape	N	The Applicant has had regard to the consultation feedback received during the non-statutory and statutory consultation and has developed its design proposals in response to the feedback received. The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application. The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3).
Local Community	09.05.2018	29.05.2018	Would like open day for existing facility	N	The Applicant holds open days to its existing facility on an ongoing frequent basis. It held open days for the local community between 10 th -11 th April 2018. The Applicant would be open to hosting additional open days as the REP DCO application progresses.
Local Community	09.05.2018	29.05.2018	Staff seemed very competent	N	The Applicant has noted this comment.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	<p>The proposal make sense. Just ensure the pollution is kept really low.</p> <p>What are proposals past this project?</p>	N	<p>Chapter 7 of the ES (Document Reference 6.1) sets out the assessments on the potential emissions to air quality from the construction, decommissioning and operation of the Proposed Development. Table 7.12 of the ES (Document Reference 6.1) sets out that operational emissions will be controlled in line with the environmental permitting requirements pursuant to the Industrial Emissions Directive (IED) and an appropriate stack height has been selected. The assessment identifies that the likely effects from potential emissions are Not Significant.</p> <p>Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from the Proposed Development.</p> <p>The Applicant is continually exploring ways to meet London’s waste management and energy generation infrastructure needs. The Applicant will continue to engage with the local community on emerging projects.</p>
Local Community	09.05.2018	29.05.2018	<p>I would like to be kept informed of any proposals for a nature park or area that could be set up for the benefit of local residents be it in an environmental way or for social inclusion. To the residents have to put up with increased traffic. And pollution it should be offset with community projects to tackle it.</p>	N	<p>As described in the Consultation Report (Document Reference 5.1), the Applicant wrote to any local community respondents that had been asked to be kept informed of the project to provide an update following the statutory consultation.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					There will be significant benefits for the local community through Cory’s investment as described in the Project Benefits Report (Document 7.2) and Socio Economic (Chapter 14 Document Reference 6.1). Cory has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley.
Local Community	09.05.2018	29.05.2018	We have no access to waste food disposal. As Bexley Council took this facility away as the site is in Bexley give them a kick in the pants to get it sorted.	N	The Applicant has noted this response.
Local Community	09.05.2018	29.05.2018	Regarding the design of the building, Design 2 is the least ugly of the three and has some connection with what is already there. Design 1 is a featureless box. This time, account should be taken of the view of the building from inland, which is heavily populated, rather than if found from the north bank, which was the major concern when the incinerator was being planned.	Y	The Applicant has had regard to the consultation feedback received during the non-statutory and statutory consultation and has developed its design proposals in response to the feedback received. The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application. The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual impact. The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3).

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					<p>The Applicant provided additional information on visual impacts at the statutory section 47 local community exhibitions. Furthermore, a full Townscape and Visual Impact Assessment (TVIA) has been undertaken and the findings are presented in Chapter 9 of the ES (Document Reference 6.1). The TVIA presents the effects on the townscape features and character of the Application Site, and the townscape character of the study area and also provides an assessment of effects on people’s views and visual amenity arising from the construction, operation and decommissioning of the Proposed Development. The study area includes townscape and views from both north and south of the River Thames.</p> <p>Furthermore the Applicant has developed Design Principles (Document Reference 7.4) which the detailed design must be in accordance with to ensure mitigation for any visual effects is secured within the DCO application.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Local Community	09.05.2018	29.05.2018	<p>Cory are in danger of falling into the same clichéd arguments as national and local governments - banding about their environmental credentials when all they are really talking about is Climate change, energy provision and recycling - no mention of the natural environment which is vital to all our futures and should not be considered as a side aspect or a mitigation factor. It should be there alongside the human needs.</p> <p>With a project such as this which has some amazing innovations and factors that should give high credit to the company, this is the time for Cory to prove their “environmental credentials” and be at the forefront of Energy provision but also open spaces and buildings fit for people and wildlife.</p>	Y	<p>The Planning Statement (Document Reference 7.1) states that, on balance, the likely benefits of the Proposed Development outweigh any potential adverse impacts of the Proposed Development. These benefits include, amongst others: removing vehicles from London’s road through using river transport, providing environmental mitigation and enhancement, local and regional economic benefits and the considerable public benefit to meeting the national need for new renewable/low carbon electricity supply and storage.</p> <p>An ES has been submitted as part of this application which details the findings of the Environmental Impact Assessment (EIA) undertaken (Document Reference 6.1).</p> <p>The Applicant has given careful consideration to the mitigation and enhancement required for terrestrial biodiversity. This is presented in an Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p>
Local Community	09.05.2018	29.05.2018	I have been aware of and visited the nature reserve since I lived in Dartford in the 1980s. It would be a shame to see its aesthetics and viability decrease by	y	An Environmental Impact Assessment has been undertaken and the final findings are contained with the ES (Document

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			imposing energy creating structures. [Chair GACO] We would welcome a balanced approach in any development on or near the reserve with the aim of not decreasing it's aesthetics and wildlife viability.		<p>Reference 6.1) that accompanies the REP DCO application. This includes assessments of terrestrial biodiversity and townscape and visual impacts, including on Crossness LNR.</p> <p>Chapter 9 of the ES (Document Reference 6.1) presents findings of the townscape and visual impacts assessment. As set out in Chapter 9 and the Design Principles document (Document Reference 7.4) the preferred building form provides embedded mitigation for visual effects, including from Crossness LNR.</p> <p>Chapter 11 of the ES (Document Reference 6.1) the findings of the assessment of likely significant effects on terrestrial biodiversity arising from the construction, operation and decommissioning of the Proposed Development. Mitigation measures to ensure Crossness LNR is protected as far as practicable during the construction and operation of REP are set out in the Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6).</p>
Local Community	09.05.2018	29.05.2018	In conclusion, I am utterly despondent at the proposal and disgusted by the fact that you are presenting this as a genuine contribution to London’s green economy. We both know that the erection of yet another incinerator is as far from a provision of “reliable renewable energy generation” as the erection of a nuclear power plant. I have found your “consultation”	N	The Applicant has noted this response. The Applicant had regard to feedback from the non-statutory consultation which informed information provided during the statutory section 47 consultation.

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
			to be a perversely futile exercise and the marketing of your new “energy park” inherently misleading.		<p>As well as electricity and heat, the Energy Recovery Facility will produce by-products (Incinerator Bottom Ash and Air Pollution Control Residue), both of which will be recycled for use in the construction industry. Furthermore, the Anaerobic Digestion Facility will accept green and food waste and, therefore, help contribute towards the zero biodegradable or recyclable waste being sent to landfills. As such, REP will support the drive to move waste further up the waste hierarchy for waste that cannot be prevented. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).</p> <p>There is a national need for major energy infrastructure, such as REP, as established in the NPS EN-1 and NPS EN-3. REP also supports regional and local waste management needs. Despite the expected improvements in the prevention, re-use and recycling of waste, there still remains residual waste capacity that is needed to divert waste from the landfill and moved up the waste hierarchy. REP will be a suitable alternative to help treat London’s waste remaining after recycling, thereby providing an alternative in preventing waste being sent to landfills or shipped overseas. Therefore, the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor’s recycling targets. Further details are provided in the</p>

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Consultee	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
					Project and its Benefits Statement (Document Reference 7.2).

Table 2 - Relevant response received in response to the Non-Statutory Consultation in May 2018 (emailed to the project team)

Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
Local Community	09.05.2018	29.05.2018	Transport	1. With the waste coming by boat / barge what happens to waste transportation if the boat service or jetty has an issue or failure ?	N	Cory has been bringing waste into it’s existing RRRF facility without any service interruption since 2011. The risk of any service disruption on the river is in general less than that of the road. However, to demonstrate the assessment of a reasonable worst case, a traffic and transport assessment has been undertaken in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3), to assess ‘100% by road’. No likely residual effects have been identified. reasonable worst scenario) representing possible Operational methods at REP. These are presented and appraised
Local Community	09.05.2018	29.05.2018	Health and Safety	2. What are the contingency plans?	N	The Environmental Permit will contain a series of management procedures and protocols should and unforeseen event occur. The impacts from major accidents hazards are not expected to be significant taking into account the controls in the Environmental Permit and as such a standalone assessment of major accident hazards was scoped out of the ES. However, issues relating to major accidents and disasters are considered within Appendix K.6 of the ES (Document Reference 6.1).
Local Community	09.05.2018	29.05.2018	Community impacts	3. How will this impact the local residents ?	N	There will be significant benefits for the local community through Cory’s investment as described in the Project Benefits Report (Document 7.2).

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
						The ES (Document Reference 6.1) presents the findings of the EIA, a summary is included in Chapter 16 and the Non-Technical Summary (NTS) (Document Reference 6.4).
Local Community	09.05.2018	29.05.2018	Air Quality	4. With the previous Cory proposal now in situ there were local concerns regarding the release of waste in the form of particulates, soot and dioxins. What health impact assessment has been proposed or considered for these latest proposals?	N	The potential impact on human health from the operational emissions of REP have been assessed in Chapter 7 of the ES (Document Reference 6.1) and no significant impacts are anticipated. Furthermore, a Health Impact Assessment (Appendix K.1 of the ES, Document Reference 6.3) has been undertaken and concludes that effects on health outcomes will not be significant.
Local Community	09.05.2018	29.05.2018	Health and Safety	5. Are there any health enquiries being undertaken ?	N	
Local Community	09.05.2018	29.05.2018	Health and Safety	6. Has there been any increase in detrimental health outcomes since the current plant was built and is there any prospect for further concerns with the new proposals ?	N	The Applicant can confirm no undue odour impacts are expected and there have been no complaints received for the RRRF since it opened in 2011. The Applicant advises individuals to report any experiences of odour to the Environmental Health Officer at London Borough of Bexley so the source can be identified and action taken.
Local Community	09.05.2018	29.05.2018	Consultation	7. The Cory site currently operating was subject to Public Enquiries in 2003 and 2005. Have the lessons been learnt from these and will the local residents be more fully engaged with and their concerns properly and fully addressed ?	N	The Applicant carried out non-statutory consultation during May 2018 in advance of the commencement of the statutory consultation period. This allowed the Applicant to introduce the Proposed Development to the public, share the Applicant’s initial plans with people living in the vicinity of the Application Site, and gather initial feedback on the Proposed Development. Appendix J1 of the Consultation Report (Document Reference 5.1) summarises the feedback from, and the Applicant’s response to, the non-statutory consultation.

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
						<p>During the non-statutory consultation the key themes which arose from the general public were:</p> <ul style="list-style-type: none"> ▪ Potential impacts on ecology and local environment; ▪ Additional road movements; ▪ Air quality; ▪ Potential waste odour; and ▪ Construction impacts for the electrical connection. <p>The Applicant therefore sought to include additional information regarding these topic areas in the information presented at the statutory public exhibitions, as shown on the July 2018 Consultation Panels (Appendix I.4) and to ensure these matters were adequately addressed in the PEIR published at the time of the statutory consultation.</p> <p>The Applicant made available information shown at the statutory consultation public exhibitions regarding the Proposed Development from 9th May 2018 – 29th May 2018 on the project website (https://riversideenergypark.com/consultation/materials).</p>
Local Community	09.05.2018	29.05.2018		8. In 2012 on opening the Belvedere Energy Waste Plant there were substantial falls in re cycling rates in Lambeth,Wandsworth, Hammersmith and Fulham, Kensington and Chelsea provided to the Western Riverside Waste Authority. As had the rates for the Sutton waste recycling site servicing Croydon, Kingston Upon	N	<p>In addition to the anticipated improvements in the prevention, re-use and recycling of waste, there remains an infrastructure deficit for the treatment of residual waste capacity that needs to be diverted from landfill and moved up the waste hierarchy. REP will help bridge that gap and be a suitable alternative to help treat London’s waste remaining after recycling, thereby providing an alternative in preventing waste being sent to landfills or shipped overseas. Therefore, the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor’s ambitious recycling targets. Further details are provided</p>

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
				Thames, Merton and Sutton. What are the comparator sustainable recycling rates volumes between 2012 and 2018 ?		in the Project and its Benefits Statement (Document Reference 7.2).
Local Community	09.05.2018	29.05.2018	General Comments	9. What are the costs of household waste when landfilled compared to incineration ? These comparators should include consideration for re cycled, co mingled and re cycled from segregated collections?	N	This Application does not provide information on specific costs of varying waste management techniques. General waste management gate fee information can be found on www.wrap.org.uk
Local Community	09.05.2018	29.05.2018	Air Quality	10. What is the process undertaken to ensure good air quality is achieved in the surrounding residential and industrial areas ?	N	Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant air quality effects from the operational phase of REP. The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency. In addition, Furthermore, an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts air quality during construction.
Local Community	09.05.2018	29.05.2018	General Comments	11. In 2015 the European Union Commission estimated that their Clean Air package would save £31- £110 billion and prevent 58,000 premature deaths from Air pollution by 2030. Will the Cory development be applying	N	This Application is being submitted and determined under the current legislative regime. The future position post Brexit is unknown.

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
				<p>these processes to its site (due to be complete currently in 2024) or will Brexit have a detrimental impact on such considerations?</p> <p>12. The EU Circular Economy package would have created 580,000 jobs at an alleged saving of £475 billion. Has this been abandoned under Brexit ?</p>		
Local Community	09.05.2018	29.05.2018	Air Pollution	<p>13. What is the cost of poor air quality ?</p> <p>14. What are the health implications of poor air quality ?</p> <p>15. How many premature deaths occur as a consequence of poor air quality ?</p> <p>16. How many vulnerable groups would be detrimentally impacted by poor air quality ?</p> <p>17. What responsibilities has LBB imposed upon this project regarding Air Quality ?</p> <p>19. Would Belvedere, Thamesmead, Erith, Slade Green and Barkingside qualify post construction as ULEZ (Ultra Low Emission Zones) having this industrial activity in its immediate vicinity ?</p>	N	<p>Poor air quality in London is primarily associated with emissions from vehicular traffic and air quality is worst alongside busy roads. We have assessed the air quality effects during construction, operation and decommissioning of REP at appropriate roadside locations, and the effects are presented in Chapter 7 of the ES (Document Reference 6.1) for impacts on human health and terrestrial biodiversity. The effects of all relevant pollutants have been assessed, from all relevant sources; the assessment has taken into account emissions from REP as well as existing sources of pollution in the area (RRRF and Crossness Sewage Treatment Works) along with emissions from road and river traffic. Where applicable, the impacts of the development have been assessed against values set out in the Air Quality Strategy. Impacts at human health receptors are considered not significant for all pollutants. The impacts to terrestrial habitats are also considered Not Significant.</p>

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
Local Community	09.05.2018	29.05.2018	Design	<p>18. What responsibilities has LBB imposed upon this project regarding the: sustainability issue</p> <ul style="list-style-type: none"> • Energy provision (referencing Hi and Lo peak supply) • Health monitoring? • Recycling? • Dioxin exhaust 	N	By generating electricity from domestic and commercial residual waste, after recycling, the Applicant aims to improve resource efficiency, avoiding waste to landfill, and achieving greater sustainability as part of London's circular economy. More information about the heat and electricity production of the facility is provided in the CHP report (Document Reference 5.4).
Local Community	09.05.2018	29.05.2018	Health	<p>18. What responsibilities has LBB imposed upon this project regarding the: sustainability issue</p> <ul style="list-style-type: none"> • Energy provision (referencing Hi and Lo peak supply) • Health monitoring ? • Recycling? • Dioxin exhaust 	N	The Human Health Risk Assessment, appended to Chapter 7 of the ES (Document Reference 6.1) has assessed the long term accumulation of dioxins and concludes that there will be no significant effects in relation to long term exposure to dioxins and metals.
Local Community	09.05.2018	29.05.2018	General Comments	20. Where are all the data sets derived from as shown on the Cory website ?	N	The Applicant is unclear which data set the response is referring to.
Local Community	09.05.2018	29.05.2018	Transport	21. How accurate is it to assert that 1,000,000 tonnes of waste as proposed to be transported by river barge saves 100,000 lorry journeys ?	N	A full traffic and transport assessment has been undertaken of the peak Construction period (anticipated to be Month 13 of the programme) and for two scenarios (the 'nominal' scenario and the '100% by road' reasonable worst scenario) representing possible Operational methods at REP. These are presented and appraised in Chapter 6 of the ES (Document

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
						<p>Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the strategic road network, within the agreed area of the TA scope, during the construction and operation of the Proposed Development. No likely residual significant effects are identified.</p> <p>The scope of the reports was agreed with the Local Planning Authorities; Local Highway Authorities and Highways England.</p>
Local Community	09.05.2018	29.05.2018	General Comments	22. How can / could members of the public monitor / review the correct application of environmental permits ?	N	The Environment Agency is the regulatory body for the Environmental Permit. The Applicant and the Environment Agency publish all their emission data on their respective website.
Local Community	09.05.2018	29.05.2018	General Comments	23. What evidence is there to support the assertion by Cory of “No waste “ by 2030 ?	N	<p>As stated in in the Project and its Benefits Report (Document 7.2):</p> <p><i>‘Issues associated with the exportation of waste to landfill and RDF overseas support the need for waste management self-sufficiency. To manage waste sustainably, draft London Plan policy S18 states: “the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026”</i></p> <p><i>To promote increased recycling, draft London Plan policy S17 opens with reference to the circular economy and a desire to ‘keep products and materials at their highest use for as long as possible’. Policy S17A/3 seeks to ensure ‘that there is zero biodegradable or recyclable waste sent to landfill by 2026’, whilst policy S17A/4 sets the recycling targets to be achieved, identifying 65% for municipal waste by 2030.</i></p>

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
						<i>In comparison to other major European cities, London performs well with regards to recycling rates (see Figure 4). A further increase in recycling rates to achieve the 65% target presents numerous difficulties, especially considering the inherent recycling challenges specific to London, including housing density and types of homes (e.g. flats), dependence on householder segregation of waste and local authority priorities and availability of scarce public resources. The LES acknowledges the very real challenges in achieving the targets, not least the absence of any direct means of delivery and a lack of funding.'</i>
Local Community	09.05.2018	29.05.2018	Other Considerations	24. What is the projected increased waste tonnage to be processed year on year ?	N	It is anticipated that the Energy Recovery Facility element of REP would treat approximately 655,000 tonnes of residual (non recyclable) waste per annum. However, for the environmental assessments a 'reasonable worst case' maximum throughput of approximately 805,920 tonnes per annum has been assessed. The expected throughput of the Anaerobic Digestion facility is 40,000 tpa.
Local Community	09.05.2018	29.05.2018	Transport	25. Is the river traffic sufficiently low volume that such increased volume tonnage could still be transported in this manner ?	N	The Navigational Risk assessment (Appendix B.2 of the ES Document Reference 6.3) has assessed the '100% by river' scenario and concludes that the Proposed Development would have negligible impact upon navigational safety on the River Thames.
Local Community	09.05.2018	29.05.2018	Hydrology	26. The South East of UK is now becoming the most arid area of Europe, what will the water usage be of this plant be year on year ?	N	Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from the Proposed Development. This assessment has also considered water usage of the facility.

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Appendix J.1 – Non-Statutory Consultation Responses and Applicant’s Comments

Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
Local Community	09.05.2018	29.05.2018	Design	27. The local planning for the cabling from this plant to the proposed Littlebrook substation in Dartford would require between 10 and 13 kilometres of road works dependent upon routes determined as optimal. How long would such impacts take to complete bearing in mind that Bexley has had to endure travel disruptions because of both London Bridge train station upgrades and Crossrail over several years. This now offers traffic disruptions of similar magnitude ?	N	<p>The Electrical Connection will run underground between the REP site and the Electrical Connection Point at Littlebrook substation connecting into an existing National Grid building in Dartford. No external alterations or upgrades at Littlebrook substation are required, as described in Chapter 3 of the ES (Document Reference 6.1).</p> <p>The construction works associated with the Electrical Connection would be transient and would result in delays similar to other statutory utility road works as the construction process moves along the route. The construction works would not be as extensive or as disruptive as major road works. A qualitative assessment of the Electrical Connection options was undertaken for the ES. However, the Applicant is working closely with UKPN to confirm the final route, taking into account environmental, engineering and electrical considerations.</p>
Local Community	09.05.2018	29.05.2018	Noise and Vibration & Air Quality	28. What environmental impacts such as noise and dust would there be and what actions to mitigate it have been considered ?	N	<p>The Proposed Development has been subject to an EIA and the findings of this assessment are provided within the ES (Document Reference 6.1). This has considered all likely significant effects on the environment and nearest sensitive receptors and includes assessments of noise, air quality, amongst other impacts. Mitigation measures will be used as appropriate where they are necessary to limit impacts, including in relation to noise and air quality, and an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has been submitted with the DCO application, which the contractor will have to comply with when carrying out the construction of the Proposed Development.</p>

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Appendix J.1 – Non-Statutory Consultation Responses and Applicant’s Comments

Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
Local Community	09.05.2018	29.05.2018	General Comments	<p>My initial questions above, may or may not be relevant and possibly superseded by events or Cory declarations But hopefully they may offer the opportunity to begin the discussion within the Labour Party and then with the local residents of all areas to be impacted by this proposed development.</p> <p>There is a provision to respond to the consultation by e mail or document handed out at the event. However, before such responses are supplied to Cory it may be useful to have a meeting with our residents to ascertain what their views are on both the proposal and their concerns as a consequence.</p> <p>I am sure that much more considered and insightful views will be forthcoming once all parties have had the opportunity to digest this and further consultations.</p> <p>It is clear, that with China’s ending of its waste processing that each country will have to solve its waste issues and find the most economically viable</p>	N	The Applicant is active within the local community and chairs the Belvedere Community Forum such that views of local residents on its operations can be heard. The Consultation Report (Document Reference 5.1) explains the consultation process and includes a list of consultees, and their responses on the project to date.

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Consultee	Date consulted	Response deadline		Summary of response	Change Y/N?	Regard had to response
				<p>means to do so. To convert it to energy offers one of many solutions. I look forward to seeing the alternate views that will proceed from this initial consultation.</p> <p>I hope that this assists in offering a start to reviewing the Cory proposals and then advancing to engaging with our residents to provide them with answers too.</p>		

Appendix J.2 Section 42 Statutory Consultation Comments and Applicant's Response (June-July 2018)

Planning Act 2008: Section 42 – Prescribed Consultees

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Schedule 1

Table 1: Responses and regard had to responses from Prescribed Consultation Bodies in Schedule 1 of the APFP Regulations and Section 42(1)(a) and (aa) of the PA 2008

Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
Health and Safety Executive	Safety	13.06.18	30.07.18	The red line indicative application boundary of the development falls within the consultation zones of: Henkel Ltd. (HSE ref H3322); Nufarm UK Ltd Crabtree Manorway (HSE ref H0260) and; 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.	N	The Applicant is in consultation with HSE to confirm the reference to pipelines refers to 'gas pipelines' only and not standard electricity/ water pipelines and those required for the CHP element of the Application. The Applicant can confirm that the Application does not contain the installation of any gas pipelines but will contact HSE should this change.
	Safety/Permits			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	N	The Applicant can confirm that Cory does not need a Hazardous Substance Consent at RRRF and therefore does not possess one. REP will not be storing or using any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of the regulations. Therefore REP will not require such a consent either.

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				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. Further information on HSC should be sought from the relevant Hazardous Substance Authority.		
	Safety			<u>Explosive Sites</u> HSE has no comment to make as there are no licensed explosive sites in the vicinity.	N	The Applicant notes this comment.
	Safety			<u>Electrical Safety</u> HSE has no comment on electricity safety from a planning perspective.	N	The Applicant notes this comment.
Natural England	Air Quality	13.06.18	30.07.18	Anaerobic Digestion Combustion – in order to account for all emissions that may impact on Crossness Local Nature Reserve we recommend modelling all emissions including those arising from flare burning	N	The potential impacts on Crossness Local Nature Reserve have been included within the assessment. The NO _x emission rate from flaring will be lower than that from the gas engine, and will be released at a higher temperature and from a higher stack. The impact of emissions from the flaring will therefore be lower than that of those from the gas engine. Operation of the gas engine and flare will be exclusive, i.e. the flare would only operate when the gas engine isn't available. The gas engine impacts have been modelled assuming that it operates all year round and

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
						therefore this provides a reasonable worst case assessment.
	Air Quality			Figure 7.7 Annual Average Nitrogen Dioxide & Table C3.3.6 Predicted Nitrogen Deposition – we note that the Process Contribution to Nitrogen Dioxide deposition (as per Table C3.3.6) is 0.08 kgN/ha/yr at Inner Thames Marshes SSSI. Figure 7.7, however, shows a range of annual average Nitrogen Dioxide concentrations over two sections of the SSSI (contours covering 0.4 to 0.6 µg/m ³). We recommend modelling the Process Contribution deposition in the same way as annual average Nitrogen Dioxide concentrations (i.e. using contours rather than a single figure for the whole SSSI). This could also be modelled against varying stack heights to show any changes in Process Contribution to Nitrogen Dioxide deposition at Inner Thames Marshes SSSI.	N	Contours for nitrogen deposition are provided in Figure 7.11 of the ES (Document Reference 6.2) for forest deposition (which is higher than for grassland deposition). The maximum nitrogen deposition Process Contribution at Inner Thames Marshes SSSI is less than 1% of the critical load and therefore not significant with a stack height of 90m. A higher stack height would reduce deposition to the Inner Thames Marshes SSSI further and therefore this has not been modelled.
	Air Quality			Figure 7.7 Annual Average Nitrogen Dioxide & Table C3.3.7 Predicted Acid Deposition – similar to the point above, we advise that the predicted acid deposition is modelled as a range across the Inner Thames Marshes SSSI against the annual average Nitrogen Dioxide bands of concentrations as per figure 7.7. Varying stack heights could also be incorporated in the model.	N	Contours for nitrogen deposition are provided in Figure 7.11 of the ES (Document Reference 6.2) for forest deposition (which is higher than for grassland deposition). The maximum nitrogen deposition Process Contribution at Inner Thames Marshes SSSI is less than 1% of the critical load and therefore not significant with a stack height of 90m. A higher stack height would reduce deposition to the Inner Thames

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
	Terrestrial Biodiversity			Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.	N	Marshes SSSI further and therefore this has not been modelled. Regard has been taken to Natural England's standing advice on protected species.
Historic England	Historic Environment	25.06.18	30.07.18	The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.	N	Chapter 10 of the ES (Document Reference 6.2) and Appendix F.2 of the ES (Document Reference 6.3) outline the areas of geoarchaeological interest and the ground disturbance of the Proposed Development and considers the effects of the Proposed Development. Following submission of the updated deposit model and DBA to the Archaeological Advisor to London Borough of Bexley it has been agreed that the following mitigation works will be secured through the production of a written scheme of investigation (WSI) once the DCO has been made. Requirement 7 of the draft DCO requires the approval of an archaeological written scheme of investigation before the commencement of the relevant works. Further information on the intended WSI (if required) can be found within Section 10.11 of Chapter 10 of the ES (Document Reference 6.1).

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
	Historic Environment			<p>In May 2018 having received the attached documents from Orion Heritage, archaeological advisors to the applicant, I advised the following:</p> <p>Thank you for draft copies of the heritage DBA; geoarchaeological deposit model; and the stage 1 geoarchaeological specification.</p> <p>Having considered the submitted documents (and only the portion of the dba that relates to the London Borough of Bexley) I will be happy to recommend there approval, when I am consulted by the borough planner, once they have been forwarded as a submission of detail in pursuance of the archaeological interest.</p>	N	The Applicant notes this comment.
	Historic Environment			<p>It should be noted that the GLHER request along with a completed OASIS form, a shape or dwg/dxf files of any evaluation trench plans, area excavation, areas within a site targeted for observation and recording or other forms of intervention as per Historic England guidance. I therefore require the trench data file(s) as part of the report approval process.</p>	N	<p>The assessment work for Chapter 10 of the ES (Document Reference 6.1) to date has not involved archaeological fieldwork, and therefore production of shape dwg/dxf files is not yet required. The trench data files (dwg/dxf) will be a requirement of final mitigation works. The location of the final archaeological works will be fixed after the submission of the REP DCO. A Requirement to undertake a WSI for these future works (and therefore provision of the dwg/dxf files) is included as requirement 7 of the draft DCO (Document Reference 3.1).</p>
	Historic Environment			<p>The result of the stage 1 geoarch. monitoring of the planned geotechnical work will result in a revised/refined</p>	N	<p>The Stage 1 geoarchaeological works have been completed and submitted to the Archaeological Advisor at LBB. It has been</p>

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				deposit model. The anticipated report will also need to consider the model in the context of the model of the Lower Thames Floodplain produced for publication 8 in the Archaeology Crossrail series, 2017.		agreed The Lower Thames Floodplain produced for publication 8 in the Archaeological Crossrail series will be referenced in Stage 2 of geoarchaeological works. These will be undertaken post-determination, pursuant to any WSI to be agreed.
	Historic Environment			As indicated in the historic deposit model report and stage 1 specification, the results will inform the potential on-going geo/archaeological interest with the site that may therefore lead to a stage 2 of geo/archaeological work. Once the detail of the major ground disturbance work is known in respect of the planned energy station, plus consideration of secondary impacts such as attenuation tank(s), the potential form of geo/archaeological interest can then be scoped.	N	<p>The deskbased assessment (Document Reference 6.3, Appendix F.1) outlines the physical impact of the Proposed Development, in relation to the geoarchaeological deposits of interest. This allows Historic England to make an informed view regarding the archaeological effects.</p> <p>The potential form of geo/archaeological interest has been scoped in the updated DBA and deposit model which have been submitted to the Archaeological Advisor to London Borough of Bexley. It has been agreed that the following mitigation works will be secured through the production of a written scheme of investigation (WSI) once the DCO has been made: excavation of two boreholes identified by QUEST (QUATERNARY SCIENTIFIC – School of Archaeology, Geography and Environmental Science, Reading University) for geoarchaeological assessment, analysis and publication. Requirement 7 of the draft DCO requires the approval of an archaeological written scheme of investigation before the commencement of the relevant works.</p>

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
	Historic Environment			<p>In addition to your letter of 12 June 2018, the supplied data-stick included:</p> <ul style="list-style-type: none"> • Chapter 10: Historic Environment Report • Chapter 16: Summary of Preliminary Findings • Appendix F1: Historic Environment Figures • Appendix F2: Heritage Desk Based Assessment • Appendix F3: Desk Based Deposit Model Report • Appendix F4: Written Scheme of Investigation <p>Given the above proposed submissions, I will be happy to recommend approval of the heritage desk-based assessment report and deposit model report when consulted by the LPA.</p> <p>I will also be able to recommend approval of the proposed geoarchaeological borehole survey specification that will include an assessment of the recovered cores with the identification of which should be taken to full analysis in the event that no suitable second stage geo/archaeological intervention is required.</p> <p>It is anticipated that the assessment report of the recovered cores will include a compare and contrast element with</p>	N	<p>The Applicant notes this response and welcomes the approvals referred to.</p> <p>The pre-determination assessment work does not reference the cross rail published deposit model, however it has been agreed with Historic England that this will be undertaken as part of the mitigation work secured through a DCO requirement.</p>

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				<p>the Crossrail published deposit model for this area of the Lower Thames Floodplain.</p> <p>As indicated in the historic deposit model report and stage 1 specification, the results will inform the potential on-going geo/archaeological interest with the site that may therefore lead to a stage 2 of geoarchaeological work. Once the detail of the major ground disturbance work is known in respect of the planned energy station, plus consideration of secondary impacts such as attenuation tank(s), the potential form of archaeological interest can then be scoped and whether limited further pre-determination work will be necessary or that it can be secured by condition(s).</p>		
Environment Agency	Hydrology, Flood Risk and Water Resources	15.06.18	30.07.18	<p>Chapter 12 Hydrology, Flood Risk and Water Resources of the Preliminary references the Environmental Permitting Regulations and the Water Resources Act 1991.</p> <p>As of 6th April 2016, the Water Resources Act 1991 has been amended and flood defence consents now fall under the Environmental Permitting Regulations. Any works in, over, under or within eight metres of the top of bank or with 16 metre of the flood defences may require a Flood Risk Activities Permit (FRAP). No mention is made</p>	N	The Applicant notes this comment. Works for the Proposed Development will be within 16 m of the flood defences, however, the need for a Flood Risk Activity Permit (FRAP) has been disapplied through the draft DCO (Document Reference 3.1). The Applicant has therefore also included within the draft DCO Protective Provisions for the benefit of the Environment Agency and is in discussion with the Environment Agency to agree appropriate wording on these.

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				<p>within the PEIR as to the requirements for a FRAP from the Environment Agency. It has previously been indicated that the applicant may seek to disapply the need for a FRAP through the DOC process. This has not been mentioned with the PEIR. FRAPs will be required for any working with 16 metres of the Tidal Defences or in, under or over any main river (connection).</p> <p>If the need for FRAPs is to be disapplied we will need to agree to this with appropriate protective provisions. We would welcome early discussion on this to allow us to consider this as a possibility.</p>		
	Hydrology, Flood Risk and Water Resources			<p>Figure 3.1 Parameter Plans Site Plans VAA-WA-50085010 shows the outline of the northwest corner of the main REP building as being over the flood defence anchor. The “Indicative Application Site Boundary” appears to include the flood defence in this vicinity. It is currently unclear what the distance will be from proposed structures to the flood defence. We will require at least four cross-section drawings with plenty of dimensions showing the northern end of the building and the existing and proposed ground surface profiles as well as the flood defences including their buried elements.</p> <p>The section locations should be chosen</p>	N	<p>It is not anticipated that the Proposed Development would affect the existing flood defences. Whilst, works for the proposed development will be within 16 m of the flood defences, the need for a Flood Risk Activity Permit (FRAP) has been disapplied through the draft DCO (Document Reference 3.1). The Applicant has therefore also included within the draft DCO Protective Provisions for the benefit of the Environment Agency and is in discussion with the Environment Agency to agree appropriate wording on these.</p> <p>In addition, a flood defence condition survey has been completed as part of the REP DCO application (Appendix E of Document Reference 5.2).</p>

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				to show the worst case relationship between the flood defences and the new works and a reasonable representation of the works from west to east.		An eastern elevation plan has been included as part of the application in Document Reference 2.5 . It is not considered that further cross sections are required. However, these can be provided in due course should they be required during the course of the discussions referred to above.
	Hydrology, Flood Risk and Water Resources			Chapter 12 Hydrology, Flood Risk and Water Resources of the Preliminary Environmental Information Report references various planning Policies and Guidance regarding 16 metre setback of developments from flood defences, the development should be designed to be in line with these polices.	N	The Applicant notes this comment. Works for the Proposed Development will be within 16 m of the flood defences, however, the need for a Flood Risk Activity Permit (FRAP) has been disapplied through the draft DCO (Document Reference 3.1). The Applicant has therefore also included within the draft DCO Protective Provisions for the benefit of the Environment Agency and is in discussion with the Environment Agency to agree appropriate wording on these.
	Hydrology, Flood Risk and Water Resources			The documents do not include a red and blue line land ownership boundary and while the PEIR acknowledges the poor condition of some of the flood defences and commits to undertake a condition survey and demonstrating that the defences can be raised in line with the Thames Estuary 2100 Plan no mention is made of replacing or upgrading the defences as part of the DCO application. This will need to be committed to as part of the application as the walls not only protect the site but the wider area. The defences will need to be fit for purpose for the lifetime of the development and be able to be raised to the Thames Estuary 2100 level in line with lifetime of	N	It is not anticipated that the Proposed Development would affect the existing flood defences. A flood defence condition survey has been completed as part of the REP DCO application (Appendix E of Document Reference 5.2). On-going discussions with Environment Agency are continuing on this and other matters and it is anticipated that a Statement of Common Ground (SOCG) will be submitted with the Environment Agency during the course of the Examination.

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				the development. This may mean that replacement/renewal works are required as part of the development works subject to the finding and recommendations of the Flood Defence Condition Survey.		
	Hydrology, Flood Risk and Water Resources			The proposal includes more than one power cable route but one route passes close to Green Level Pumping Station and would go over the Green Level Dyke main river Culvert. The route crosses the River Cray and the River Darent further to the east. The new cable should pass under the watercourses deep enough to avoid the risk of damage. There are earth flood defences at the River Darent and the integrity of the embankments must not be compromised by the cable installation. However, it is possible that the cable route will go over the road bridge and therefore not affect the river or the defences below.	N	<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>However, Section 12.8 of the ES (Document Reference 6.1) confirms that where required cables would be laid at a sufficient depth beneath watercourses to avoid causing damage to the integrity of embankments during installation.</p>
	Hydrology, Flood Risk and Water Resources			We will expect to see full Water Framework Directive (WFD) compliance assessments for all marine works that would ordinarily require marine licences (from PLA or /and MMO). We anticipate sediment chemistry data will be required to support any marine licence	N	The Applicant notes this comment. However, since the Scoping Opinion was issued by the Secretary of State, the scope of REP has been reduced. Temporary construction and dredging works within the marine environment, which were included in the Scoping Report, are no longer included as part of the Proposed

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				<p>applications, or the equivalent process within the DCO. The documentation provided has not addressed these matters yet, though it does make reference to the Water Framework Directive. Individual WFD assessments for works will require our consultation when the detail on the proposed works is at a more advanced state of knowledge.</p> <p>We would prefer to see WDF assessments as standalone documents (or a standalone chapter) within the ES, rather than have to extract the relevant details for multiple WFD elements from other chapters within the ES.</p>		<p>Development (see Section 4.4 of the Consultation Report, Document Reference 5.1). Therefore, as marine works are not proposed, marine licences will not be required. This has been communicated and agreed with the Environment Agency through the ongoing pre-application consultation.</p> <p>The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i></p>
	<p>Terrestrial Biodiversity</p> <p>Marine Environment</p> <p>Hydrology, Flood Risk and Water Resources</p> <p>Terrestrial Biodiversity</p>			<p>It is our understanding that the proposed development will utilise the existing Jetty. Any dredging of the intertidal foreshore should be avoided (if necessary mitigation will be required) and any dredge near the intertidal zone should be conducted to minimise the chance of increased erosion of the intertidal e.g. deeper water allowing larger energy waves closer to the intertidal zone. This is because mudflats are an important biodiversity action plan habitat. We agree with the findings in the PINs response that the effects of a wave shadow and general erosion or accretion should be considered.</p>	N	<p>As noted above, following changes to the design there will no direct impacts to the River Thames or aquatic biodiversity. No dredging or works to the jetty will therefore be required.</p> <p>Construction of REP will not preclude access to the flood embankment or River Thames.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. Opportunities for appropriate</p>

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				<p>Under our aims to improve the Thames estuary for wildlife and the associated Water Framework Directive, this location has been identified as an opportunity to eventually replace the rock armour on the riverbank with something more wildlife friendly e.g. timber terraces of saltmarsh. The works must not preclude the ability for this to be delivered at a later date and ideally we would like to see some of this this delivered as part of the development, in line with planning polices to enhance biodiversity.</p> <p>We request that the applicant considers low cost bolt-on enhancements for ecology to the jetty (especially if the jetty is to be refurbished at all). These could form the start of mitigation if required. This could be horizontal timbers at mean high water spring level on the landward side of the pier which vegetation may establish if not north facing).</p> <p>Guidance for both of the above can be found in our Estuary Edges guidance: https://thamesestuariespartnership.org/our-projects/estuary-edges/</p> <p>If dredging is required we advise that the WFD assessment includes surveys for the Tentacled Lagoon Worm and any other relevant protected species. We are</p>		<p>enhancement in and around the development will be sought.</p>

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				happy to provide advice on the design of any surveys.		
	Noise and Vibration Terrestrial Biodiversity			The REP will be located immediately next to the Crossness Local Nature Reserve/ Erith Marshes Local Wildlife Site. Any increase in light, noise, development in the buffer or impact on the nature reserve will need to be mitigated for.	Y	<p>Chapter 11 of the ES (Document Reference 6.1) takes into account impacts to Crossness LNR and Erith Marshes SINC. These have been assessed within the ES, including in relation to light and noise impacts. No likely residual effects were identified.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6) has been produced and accompanies the REP DCO application. The outline BLMS includes all ecological mitigation measures and opportunities to provide enhancements.</p> <p>Measures to be employed in mitigating noise, which are also applicable to ecological receptors are provided in Section 8.8 of the ES (Document Reference 6.1) and secured through both the outline BLMS and the outline Code of Construction Practice (CoCP (Document Reference 7.5))</p>
	Ground Conditions			We have reviewed Chapter 13 Ground Conditions and accept that site assessment and investigation will be undertaken in accordance with CLR11.		The Applicant acknowledges this response and can confirm that the assessment and investigations have been undertaken in accordance with CLR11.
Maritime and Coastguard Agency	Permits and Consents	13.06.18	30.07.18	We note that the project was considering whether temporary works within the River Thames were required, hence our previous response below. However, it is now recognised that no intrusive works in the marine	N	The Applicant has noted this response and can confirm that the PLA has been consulted on the Proposed Development and that engagement with the PLA is continuing throughout its development.

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				<p>environment will be required, and the existing jetty and mooring points will be utilised. As the jetty and moorings are likely to fall within the jurisdiction of the Port of London Authority (PLA), they may need to be consulted for any appropriate licences or permits. The PLA may need to work with the applicant to develop a robust Safety Management System (SMS) for the project under the Port Marine Safety Code and its Guide to Good Practice. The MCA therefore has no further comments to make on the application.</p>		
Civil Aviation Authority	Aviation	13.06.18	30.07.18	<p>London City Airport are advised of this proposal to discuss whether the flare is deemed an obstacle (within their safeguarding area).</p>	N	<p>The Applicant confirms that London City Airport has been advised of the Proposed Development and has been treated by the Applicant as a consultee under section 42(1)(a) of the PA 2008 despite not being prescribed as such. London City Airport's comments and responses are detailed below in this table.</p> <p>The height and approximate location of the main stack and building was included in the PEIR accompanying the section 42 consultation. It is assumed that the Civil Aviation Authority intended to refer to the main stack when identifying the 'flare'. However, it should be noted that the REP 'flare' stack specifically (being a low level enclosed structure for emergency use in conjunction with the Anaerobic Digestion facility) would be lower, at a height of up to 14 m. On this basis it is not considered to be a potential aerodrome obstruction.</p>

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
	Aviation			I would recommend that London Westland (Battersea) Heliport are advised, if they haven't been already.	N	The Applicant confirms that London Westland (Battersea) Heliport has been notified of the Proposed Development.
	Aviation			I have also given you a link to guidance for crane operators on aviation lighting and notification CAP1096. Temporary structures such as cranes can be notified through the means of a Notice to Airmen (NOTAM). If above a height 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	N	Whilst final details of construction plant (including cranes) has not yet been finalised, the Civil Aviation Authority's Airspace Regulation section will be notified of any crane above 91.4m. This is likely to include the crane used to erect the REP main stack. This requirement is outlined in the outline Code of Construction Practice (Document Reference 7.5)
	Aviation			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.	N	The Applicant confirms that the National Police Air Service organisation has been treated by the Applicant as a consultee under section 42(1)(a) of the PA 2008 despite not being prescribed as such. Their comments and responses are detailed below in this table.
	Aviation			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/	N	The Applicant confirms that the following local emergency services were consulted under section 42(1)(a) (see Section 6 of the Consultation Report (Document Reference 5.1)): <ul style="list-style-type: none"> London Ambulance Service NHS Trust; South East Coast Ambulance Service NHS Foundation Trust;

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						<ul style="list-style-type: none"> • Barking, Havering and Redbridge University Hospitals NHS Trust (email only); • Dartford and Gravesham NHS Trust (email only); • Lewisham and Greenwich NHS Trust (email only); • London Fire Brigade; • London Fire Commissioner; • Kent Fire and Rescue Service; and • Kent Police and Crime Commissioner. <p>Each emergency service body was provided with the consultation materials and given a deadline to respond allowing at least the statutory 28 day minimum consultation period. No responses have been received.</p>
	Aviation			I would also recommend that this proposal should be brought to the attention of the department responsible for maintaining the list and production of charting regarding tall structures at the following email address: dvof@mod.gov.uk	N	The Applicant confirms that the Ministry of Defence has been notified of the Proposed Development and consulted under section 42 of the PA 2008. Their comments and responses are detailed below in this table.
National Police Air Service	Safety	19.06.18	30.07.18	This has been looked into by our Head of Ground Infrastructure and the local NPAS base and I have been advised to inform you that your proposal would not affect our operations.	N	The Applicant has noted this response.
London City Airport	Aviation	18.06.18	30.07.18	In principle London City Airport has no objection to this project and expresses support for it. However, in order for me to fully understand any impacts it might have on the safe and efficient movement of aircraft I would like to ask you for	N	The Applicant responded by email on 6 th July, outlining the following: 1. Approximate coordinates of the stack.

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				<p>some more information before I give a final comment.</p> <p>1. I cannot find grid reference coordinates in the documents do you have an exact coordinates for the position of the 113m AOD chimneys/ stacks.</p> <p>2. Could you give me an idea of how much smoke and what colour smoke we can expect from the chimneys and an estimate of how high the smoke plumes might extend on a still day with no wind. I want to gain an understanding of what it might do to a pilot's visuals.</p> <p>3. There will be lots of landfill moving around the plant, is there a bird management strategy or methods to limit the bird presence on the site</p>		<p>2. That there is no dark smoke emitted from the exhaust stacks but occasionally visible water vapor plumes similar to RRRF may be seen.</p> <p>3. That there are no landfill operations proposed as part of the REP DCO. Waste delivered by road or river would be in sealed containers, the negative air pressure system within the Main REP Building would prevent release of odour and waste that might attract birds. The existing RRRF operates without issues arising from birds or vermin. Standard management procedures would be implemented in the event of an issue arising.</p>
	Aviation			<p>I believe I have already been in touch with Cory on this please see attached they have already answered my questions. Due to the distance from the airport, the maximum height of chimney being 113m AOD and the assurance that bird populations will not be increased as a result, London City Airport has no objection to this development.</p> <p>During the construction LCY wishes to be consulted on the use of tall cranes or changes in chimney height.</p>	N	<p>The Applicant acknowledges this comment. A statement on how the application is dealing with issues associated with aviation is included within Chapter 15 of the ES (Document Reference 6.1).</p>
Highways England	Transport	13.06.18	30.07.18	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the</p>		<p>The Applicant notes this comment.</p>

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				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. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case, particularly the M25 and A282.		
	Transport			Section 6.1 Para 6.1.3 states that a TA will be prepared. Highways England will be pleased to receive a copy for comment as soon as it is available and will be happy to work with you as it progresses.	N	The Transport Assessment carried out is appended to the ES (Document Reference 6.3, Appendix B.1). A copy has been sent to Highways England. The Applicant has worked with Highways England during the pre-application phase as is summarised below
	Transport			Within Section 6.2 Policy Context there is no reference to key Highways England policy documents that describe the approach we take to engaging in the planning system and the issues we look at when considering planning applications. These documents will be useful reference in the development of the TA. Accordingly, this section should list the following which offer advice on the information Highways England would like to see included in a planning	N	HighE has been engaged in the derivation of the transport evidence for the REP application. The level of impact from the construction and operation of REP would be imperceptible on the HighE network. The TA establishes the documents which have been used to inform the assessment and are referenced at Section 1.5.8 of the TA (Appendix B.1 of the ES, Document Reference 6.3).

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				<p>proposal, and outline the support Highways England can offer:</p> <ul style="list-style-type: none"> • DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development (Sept 2013); • Planning for the future – A guide to working with Highways England on planning matters (Sept 2015) 		The TA references and accords with the methodology within DfT Circular 02/2013 and 'Planning for the future'.
	Transport			<p>Kent County Council have expressed concerns over the impacts from both the construction and operational phases of the development on Junction 1A of the A282, primarily during peak periods and when there are delays induced by incidents. However the PIER document refers to discussions and agreements made with DBC and KCC officers during a pre application meeting that the expected traffic flows generated by the proposed development do not require assessment of the A282 Junction 1A and this junction has therefore not formed part of the assessment. We need to understand the basis of these agreements, and the TA should demonstrate that the proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests are set out in DfT C2/13 para 10 and DCLG NPPF para 32). Highways England are concerned that the A282 J1a is particularly congested during weekday peak periods - a situation that</p>		<p>Records of the pre-application meetings the Applicant had with Dartford Borough Council and Kent County Council are enclosed in Appendix C.14 of the Consultation Report (Document Reference 5.1). Consultation with both KCC and DBC is ongoing throughout the application process.</p> <p>The level of impact from the construction or operation of REP would be imperceptible on the HighE network at A282/M25 Junction 1a. This is demonstrated within the TA at Tables 6.3, which shows that the Month 13 predicted peak construction percentage impact at James Watt Way junction would be approximately 3.5% in the morning peak period and, in Table 6.4, that the peak construction impact on Bob Dunn Way could be in the order of 5.2% westbound and 1.6% eastbound in the morning peak, for the temporary construction peak period. Tables 6.5 and 6.6 show the impacts at the same points to be 0.3% at James Watt Way and 0.5% westbound and eastbound at Bob Dunn Way for the operational phase of REP. Percentage impacts of REP traffic would further diminish towards Junction 1a due to development traffic</p>

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				is predicted to worsen in the next few years.		dispersal across the network compounded by the increase in background traffic volumes. (Appendix B.1 of the ES, Document Reference 6.3). The assessment presented in the TA demonstrates that the Proposed Development would not materially affect the safety, reliability and/or operation of the SRN.
	Transport			The PIER Chapter 6 also outlines that a review of 3 year's of data for collisions will be undertaken to ascertain if remedial measures on existing junctions are required. However Highways England would require 5 years of data.	N	The scope of collision data on the local highways has been agreed with TfL, LBB, HCC and DBC through the Transport Assessment scoping process. As such, it is not considered necessary to extend this to 5 years, reflecting the predicted negligible impact on the HighE network. The extremely low volume of traffic generated by REP (during construction and operation) would not materially affect the pattern of collisions at Junction 1a. The collision trend for the junction and adjoining area is shown to be reducing (source: CrashMap database) with the average reducing from 22 collisions per year over a five year period to 13 collisions per year over the latest three years.
	Transport			It is noted that a flat arrival profile has been assumed for lorry movements across 365 days and 24 hours a day. Due to the high levels of stress on the SRN at J1A, and in the absence of any forthcoming highway improvements, a robust Freight Management Plan should	N	When assessing the peak period impacts for non-worker movements, a flat profile has been assessed for the operational phase. The TA (Appendix B.1 of the ES, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1) consider a reasonable worst case scenario of 100% of

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				be produced to demonstrate that arrivals and departures can be accommodated outside of the peak periods thus removing any peak period arrivals and departures.		waste import by road and assess that scenario during the network peak periods. The TA demonstrates that such an operation would not have residual significant impacts. As such operating with goods vehicle movements outside the peak period would further reduce the residual peak period impacts. On this basis, it is not considered necessary to assess the impact of movements outside the peak periods as this would not be as robust as assessing the reasonable worst case.
	Transport			The type and frequency of the hazardous materials that could be travelling through the Dartford tunnel will need to be set out in the document to ascertain if the loads are permitted to travel through under escort, or unescorted. You may want to reference the tunnel category for Dartford to be sure that it is appropriate for all materials that might be transported to the Riverside Energy Park.	N	The Applicant confirms that the movements from the Proposed Development would not engage the restrictions on the movement of materials through the Dartford Tunnel. This is also the case with movements associated with the existing RRRF.
East London Waste Authority	Regulatory and Policy Background	18.06.18	30.07.18	It appears to ELWA that the application may need updating to reflect the Draft New London Plan (December 2017) and the London Environment Strategy (May 2018) as ELWA understands that the London Mayor has indicated that London will need no additional energy recovery facilities (such as forming a significant part of the proposed REP) once the new ones at Beddington and Edmonton are delivered.	N	The Applicant has been liaising with the GLA throughout the development of the Application. The Planning Statement (Document Reference 7.1) explains how the Proposed Development is compliant with regional planning policy and guidance (including the Draft New London Plan (December 2017) and the London Environment Strategy (May 2018). Annex A of The Project and its Benefits Report (Document Reference 7.2) provides an assessment of residual waste management capacity requirement in London and concludes and demonstrates a clear need

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						for additional residual waste management capacity.
	Combined Heat and Power (CHP)			ELWA understands too that the REP will be required to achieve the London Environment Strategy's 'carbon intensity floor', which is likely to require the provision of heat energy to nearby heat users. However, ELWA understands that the current Belvedere energy recovery facility has not yet found nearby heat users, so it is not clear to us what the prospects of supplying heat energy from the REP are. In this regard, ELWA notes the aspirations of more widespread heat recovery across London in the London Heat Map.	N	A full Carbon Intensity Floor assessment is included in the CHP Study (Document Reference 5.4). The assessment has been undertaken in accordance with GLA approved methodology and demonstrates that REP will achieve the Carbon Intensity Floor requirement set out in regional planning strategies. REP is being constructed as CHP Enabled. This means heat can be provided once users are identified. Conversations are currently ongoing between the Applicant, the London Borough of Bexley and with local end-users, such as the Peabody estate.
	Transport			ELWA further understands that the London Mayor supports the use of the River Thames for commercial traffic, particularly where this reduces road congestion, but it is not clear to ELWA where the additional riparian sources of waste are beyond those already supplying the current Belvedere energy recovery facility.	N	The Applicant operates a network of riparian transfer stations along the River Thames. These facilities have the capacity (under existing permits and permissions) to handle the residual waste that would be transported to REP for recovery. Annex A of The Project and its Benefits Report (Document Reference 7.2) provides an assessment of residual waste management capacity requirement in London and concludes a clear need for additional residual waste management capacity.
Canal and River Trust	Hydrology, Flood Risk and Water Resources	18.06.18 (Statutory Consultation)	30.07.18 (Statutory Consultation)	The Trust has reviewed your proposals, and on the basis that they appear unlikely to have any impact at all on our waterway we have no comment to make at this time. However, if because of consultation your proposals become	N	The Canal and River Trust were re-consulted during the Minor Refinements Consultation Phase as a potential new land interest in the supplementary 'A' areas (see Section 8 of the Consultation Report for further details). The

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		31.07.18 (Minor Refinements Consultation)	07.09.18 (Minor Refinements Consultation)	significantly altered, we ask that you reconsult us in order that we can re-consider this position.		Applicant did not receive any further comments from the Canal and River Trust.
Trinity House	Terrestrial Biodiversity	13.06.18	30.07.18	I note that as the project design has evolved there will now be no intrusive works in the marine environment and the existing jetty and mooring points will be utilised for this project. Proving there is no alteration to this way forward, Trinity House has no further comments concerning this development.	N	The Applicant can confirm that there will be no intrusive works in the marine environment as part of construction of the Proposed Development.
Public Health England	Air Quality	13.06.18	30.07.18	1) We are generally satisfied with the proposed methodology. We look forward to commenting on the detailed quantitative and cumulative assessments proposed.	N	The methodology for the assessment of air quality impacts on the Proposed Development has been carried out in accordance with the methodology referred to in the response and is provided in Chapter 7 of the ES (Document Reference 6.1).
	Air Quality			2) The air quality impact assessment should include evaluation of the combined impact from all emission sources on short and long-term air quality (ie a combined assessment of the operational traffic (road and shipping) emissions, installation (stack and fugitive) emissions, and emissions from nearby facilities). Each component should not be assessed in isolation, and, for example, if detailed assessment of traffic emissions (road or ship) is screened out, their contribution to the	N	The air quality impacts from combined emission sources have been evaluated where they are significant. Long term and short term impacts have been predicted, including baseline concentrations. Where a source/component is screened out as having an insignificant impact, it is on the basis that it will have an insignificant impact alone or in combination with other sources, and therefore has not been included in the cumulative assessment. Where sources/components can contribute to the total impact at a receptor, they have been

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				installation's overall air quality impacts should be included.		considered. This is set out further in Chapter 7 of the ES (Document Reference 6.1).
	Air Quality			3) There are public health benefits in reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards: as such, we recommend consideration of mitigation measures that reduce public exposures to pollutant levels as low as reasonably practicable, and that the applicant's proposed air quality management plan recognises this important principle.	N	The emissions from the ERF have been assessed in line with Best Available Techniques, which defines the inherent mitigation measures required to reduce emissions to levels as low as reasonably practicable. The measures incorporated in the design result in impacts which are not significant which demonstrates that this principle has been recognised.
	Air Quality			4) We note that the emissions from the proposed development will be controlled via an Environmental Permit issued by the Environment Agency. PHE will be consulted as part of the permitting process and will provide more detailed comments and opinion at that time.	N	The Applicant can confirm that this is correct.
	Air Quality			5) The documents submitted have identified that construction mitigation measures will be outlined within the Code of Construction Practice (CoCP) and associated plans (e.g. air quality and dust management plan (AQDMP)). It is expected that such plans will be developed and further details will be provided for comment at the application stage.	Y	An outline CoCP has been submitted with the DCO application (Document Reference 7.5). The final CoCP will be submitted to and approved by the relevant planning authority as secured in Requirement 11 of the Draft DCO (Document Reference 3.1).
Port of London Authority	Transport	13.06.18	30.07.18	Overall the PLA is pleased to see that the proposal aims to maximise the use of the river as part of the operational	N	The Applicant can confirm this is correct.

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				works, with potentially 75% of waste materials to be transported by water. Consideration has also been given within the PEIR of the use of the river during the construction phase of the development.		
	Transport			The Riverside Energy Park is expected to normally operate with a 75% by river and 25% by road split, similar to the existing Riverside Resource Recovery Facility (RRRF) facility. As part of the DCO scenarios for 100% by road and 100% by river will also be tested. The PLA supports this approach.	N	The Applicant can confirm this approach has been used within the assessment.
	Transport			As noted in the recent meeting between the PLA and the applicant on 21 June 2018, the PLA supports the applicants proposed methodology and approach to the development of the Navigational Risk Assessment as set out in chapter 6 of the PEIR review.	N	The Navigational Risk Assessment is included in Appendix B.2 of the ES (Document Reference 6.3). This has been prepared in line with the approach referenced by the PLA in its consultation response.
	Transport			Paragraphs 6.4.5 and 6.10.1 of Chapter 6 state that construction materials would be transported by both river and road, and a Construction Traffic Management Plan (CTMP) will be produced with regard to mitigating the effects of construction traffic. The PLA would expect to see commitments in the DCO on river use during the construction phase of the development.	Y	An outline Construction Traffic Management Plan (CTMP) has been submitted as part of the ES (Document Reference B.1), and secured by Requirement 13 in the draft DCO. The outline CTMP will be finalised pursuant to Requirement 13 for agreement prior to commencement of construction. The CTMP will provide for construction materials to be delivered by river.
	Planning and Consultation			The PLA notes that the redline boundary for the proposed development is still very broad at this stage, extending	N	The Applicant and the PLA are in the process of ongoing consultation on the Application,

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				across the River Thames to the borough boundary line between the London Boroughs of Bexley and Barking and Dagenham. As set out in the PLA's previous response at the EIA Scoping Report stage, it needs to be made clear why the boundary extends out this far, particularly given that there are no longer any temporary works proposed in the River Thames, and there are no planned changes to the existing riverside infrastructure. The PLA and the applicant are due to meet shortly to discuss the existing River Works License and any potential amendments that may be required.		including the need for the application boundary to extent out into the River Thames in connection with the need to agree a new/varied river works licence with the PLA. The Applicant and the PLA have agreed to progress a Statement of Common Ground to cover these matters, which will be submitted during the course of the Examination.
	Air Quality			Within chapter 7 of the PEIR the applicant states under paragraph 7.5.55 that "a qualitative assessment of emissions from operational river vessel movements has been undertaken which has not identified that significant effects are likely". Whilst this is noted the PLA recommends that the applicant makes very clear in the Air Quality chapter of the Environmental Statement the work they have undertaken to reach this conclusion including measures the applicant is implementing to reduce existing emissions as referenced in the PLA's Air Quality Strategy (2018).	N	Chapter 7 (Section 7.9) of the ES (Document Reference 6.1) sets out the impacts of river traffic on air quality, taking account of the PLA Air Quality Strategy, and concludes that the Proposed Development will not result in any likely significant effects, in relation to river traffic impacts on air quality. Furthermore, the Applicant is keen to explore ways of reducing air quality emissions from its river operations. With regard to the existing fleet, trials are being undertaken to explore options including use of bio fuels/synthetic fuels, retrofitting additional scrubber technology and optimising operational practices to increase efficiency. REP is likely to require investment in additional tugs to handle the additional throughput on the river. The additional tugs as a

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						<p>minimum would comply with relevant marine emissions standards and legislation applying at that point. However, Cory's strong preference is to adopt hybrid technology for new tugs subject to operational viability and regulatory approval.</p> <p>Measures to reduce existing emissions are discussed in Section 7.11.</p>
	Townscape and Visual Impacts			<p>The PLA notes that the principles for ensuring the appropriate use of lighting during the construction phase of the development will be set out in the Outline Code of Construction Practice (CoCP). As part of the CoCP it must be ensured that any proposed lighting does not have a negative effect on the River Thames, in terms of both navigational and environmental impacts.</p>	Y	<p>Chapter 15 of the ES (Document Reference 6.1) considers the general impacts of artificial lighting, whilst Chapter 11 of the ES (Document Reference 6.1), more specifically, considers the impacts of lighting on terrestrial biodiversity. No likely residual significant effects have been identified. An outline Code of Construction Practice (CoCP) (Document Reference 7.5) has been submitted with the REP DCO application to make provision for the use of artificial lighting during construction.</p>
	Lighting			<p>In addition, it is noted that a Lighting Statement will be included as part of the final design for the Riverside Energy Park. This must also take into account any potential impacts on the river. The PLA notes that the applicant states in paragraph 15.3.4 of chapter 15 of the PEIR that there is no additional lighting anticipated for the jetty or shared areas used for the RRRF, which is welcomed.</p>	N	<p>Requirement 15 of the draft DCO requires an operational lighting strategy to be approved, which is to be substantially in accordance with the outline Lighting Strategy (Document Reference K.3), which has been submitted with the REP DCO application. The Strategy provides an assessment of the potential effects from obtrusive light that could arise from artificial lighting associated with the operation of REP.</p> <p>Cory can confirm that there is no additional lighting anticipated for the jetty or shared areas used for the RRRF.</p>

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	Townscape and Visual Impacts			Table 6.17 (Transport Sensitive Receptors) makes reference to the Thames Path, stating that the “footpath to recreation space may be impacted by the construction phase of the development” and further states under Table 6.1 (Consultation summary) that there will be no permanent closures or diversions of Public Rights of Way (PRoW) for the main Riverside Energy Park Site or the electrical connection, and that any closures or diversions would be temporary in nature. The PLA supports the use of the Thames Path through it’s Vision for the Tidal Thames (2016) (“The Thames Vision”) and requests to be informed through the DCO process if any temporary closures are planned for the Thames Path, and when these are scheduled to be.	N	The townscape and visual effects of any proposed temporary footpath closures and diversions during the construction phases is considered in the TVIA. Chapter 9 of the ES (Document Reference 6.1) provides further details. No permanent closures or diversions of Public Rights of Way (PRoW) will be required. Temporary diversions may be required during the construction phase. The PRoW that may be temporarily diverted are shown on the Access and Rights of Way Plans (Document Reference 2.3) and listed in Schedule 5 of the draft DCO (Document Reference 3.1).
	Hydrology, Flood Risk and Water Resources			Paragraph 12.6.19 of the PEIR states that it is anticipated that ground water will flow across the Riverside Energy Park site to the north and north-east, toward the River Thames, and that a programme of groundwater monitoring is to be undertaken and observations will be documented in the Environmental Statement. The PLA requests to view this information when available. The PLA considers that as part of the CoCP, consideration must be given to any measures required to prevent materials entering the Thames during the construction phase of the development	Y	The Applicant has noted this response. An outline CoCP (Document Reference 7.5) has been submitted with the REP DCO application and provides for measures to prevent materials entering the Thames during the construction phase. The Tier 2 Preliminary Risk Assessment was informed by a programme of groundwater monitoring, the results of which are identified with Chapter 13 and Appendix I.2.

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NATS En-Route Safeguarding	Safety	13.06.18	30.07.18	NATS anticipates no impact from the Riverside Proposal in South East London and has no comments to make on the PEIR.		The Applicant has noted this response.
Royal Mail Group	Transport	18.06.18	30.07.18	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 networks.	N	Chapter 6 of the ES (Document Reference 6.1) sets out the assessments that have been undertaken in relation to transport. This includes a full Transport Assessment (Document Reference 6.3, Appendix B.1). No likely residual significant effects were identified. Requirement 13 of the draft DCO requires a Construction Traffic Management Plan (CTMP) (Document Reference B.1) to be submitted for approval before the commencement of works, and secures its implementation.
	Transport			Royal Mail's consultant BNP Paribas Real Estate has reviewed the section 42 consultation documents, including the PEIR and Non Technical Summary. It is noted that further traffic surveys have been undertaken, the data from which will be included within a detailed Transport Assessment which will accompany the Environmental Statement to be submitted with the DCO application. In order to address this, Royal Mail requests that: 1) The forthcoming DCO application	N	Chapter 6 of the ES (Document Reference 6.1) sets out the assessments that have been undertaken in relation to transport. This includes a full Transport Assessment (Document Reference 6.3, Appendix B.1). 1) The Transport Assessment considers the impact on major road users. No likely residual significant effects were identified. An outline Construction Traffic Management Plan (CTMP) (Document Reference B.1) will be submitted with the REP DCO application. This will be finalised post-consent following approval by the Local Planning Authorities.

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				<p>offers a requirement that Royal Mail is pre-consulted by Cory Riverside Energy on any proposed road closures/diversions/alternative access arrangements, hours of working and the content of the final Construction Traffic Management Plan (CTMP)</p> <p>2) The forthcoming DCO application offers a requirement that the final CTMP includes provision for a mechanism to inform major road users about works affecting the local network (with particular regard to Royal Mail's distribution facilities in the vicinity of the DCO application site)</p> <p>The above requests, made by Royal Mail at section 42 consultation stage, have been agreed and actioned by the developer of another NSIP proposal, to the satisfaction of Royal Mail and resulting in no further action by Royal Mail as a statutory consultee. Royal Mail is able to supply Cory Riverside Energy with information on its road usage/trips if required</p>		<p>2) The Royal Mail would be notified as appropriate of the works and schedule for the construction of the Electrical Connection, as provided for in the CTMP.</p>
Southern Gas Networks Plc	Utilities	13.06.18	30.07.18	<p>Southern Gas Networks PLC ("SGN") manages a network of apparatus that is used to distribute natural and green gas to 5.8 million homes and businesses across Scotland and the south of England. SGN are responsible for operating and maintaining this network of apparatus, part of which is located in</p>	N	<p>Protective Provisions for the protection of electricity, gas, water and sewerage undertakers have been included in the draft DCO (Document Reference 3.1) at Schedule 10. The Applicant has engaged with all statutory undertakers potentially affected by the Applicant, providing a copy of the proposed protective provisions and asking for their comments.</p>

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				Bexley, London within that area of land which is said to form the subject of the Order and the Works.		
	Utilities			We enclose a copy of a plan and refer the Company to those red, green and blue lines that exist within those areas of land which are shown edged in purple. These coloured lines denote the locations of gas infrastructure network that is operated and maintained by SGN ("the Existing Gas Infrastructure"). SGN is keen to ensure that the Existing Gas Infrastructure is not adversely impacted by either the granting of the Order or the implementation of the Works.		
	Utilities			SGN are prepared to discuss the terms of the Order, and the Works, with the Company but at this stage wish to emphasise that its agreement to the same will only be provided if the Company can offer assurances that the safety and integrity of the Existing Gas Infrastructure will not be compromised by either the grant of the Order or the implementation of the Works.		
	Utilities			Please note that SGN expects the Company to take all necessary and reasonable measures to ensure that the Existing Gas Infrastructure is properly protected prior to the implementation of the Works. Please be advised that if such measures should extend to the relocation of part, or all, of the Existing Gas Infrastructure then SGN expects		

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				the Company to obtain all the necessary land rights that SGN may, acting reasonably, require in order to carry out such relocation works.		
ES Pipelines Ltd and ESP Electricity Ltd	Protective Provisions	13.06.18	30.07.18	<p>Further to your enquiry received on 03/08/2018, I can confirm that ES Pipelines Ltd and ESP Electricity Ltd may be affected by the proposed works in the area of Cory Riverside Energy Park, Belvedere, South East London. ES Pipelines Ltd and ESP Electricity Ltd has gas and electricity networks serving the area in question (Reference ESPE1474, ESN7070, 1356/PPS12179, ESPE0930, ESPE0431, ESPE0350, ESPE0652, ESN017080) at grid reference E549611, N180642 and security of supply is vitally important.</p> <p>Project drawing as laid extracts for these sites are enclosed (not to scale) for your information which show the approximate location of the ES Pipelines Ltd and ESP Electricity Ltd networks close to the area of interest off Cory Riverside Energy Park, Belvedere, South East London. Please note that 'ESPE1474 Proposal' and 'ESN017080 Proposal' are proposal drawings, rather than final as-laid.</p> <p>As your plans for the proposed work develop you are required to keep ES Pipelines Ltd and ESP Electricity Ltd regularly updated about the extent and</p>	N	The Applicant notes this comment. Part 2, Schedule 11 of the draft DCO (Document Reference 3.1) includes Protective Provisions for the protection of electricity, gas, water and sewerage undertakers, including ES Pipelines Ltd and ESP Electricity Ltd to protect their assets in the vicinity of the Proposed Development. The Applicant has engaged with all statutory undertakers potentially affected by the Applicant, providing a copy of the proposed protective provisions and asking for their comments. The Applicant will continue to engage with statutory undertakers including ES Pipelines Ltd and ESP Electricity Ltd to seek agreement on the wording of appropriate Protective Provisions.

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				<p>nature of your proposed works in order for us to fully establish whether any additional precautionary or diversionary works are necessary to protect our networks.</p> <p>Arrangements can be set in place so that one of our representatives can meet on site (date to be agreed) and we will be happy to discuss the impact of your proposals on the networks once we have received the details.</p>		
National Grid Electricity Transmission plc and National Grid Gas plc	Electrical Connection Route	13.06.18/ 23.06.18	30.07.18	In respect of existing NGET infrastructure, this will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.	N	Protective Provisions for the protection of electricity, gas, water and sewerage undertakers have been included in the draft DCO (Document Reference 3.1) at Schedule 10. The Applicant has engaged with all statutory undertakers potentially affected by the Applicant, providing a copy of the proposed protective provisions and asking for their comments.
	Electrical Connection Route			Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGET's apparatus, we will require appropriate protection and further discussion on the impact to its apparatus and rights.		
	Electrical Connection Route			National Grid Gas has no gas transmission apparatus located within or in close proximity to the proposed order limits.		
	Electrical Connection Route			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		

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				<p>part of the electricity transmission network in England and Wales. The details of the electricity assets are shown below:</p> <p><u>Overhead Lines</u></p> <ul style="list-style-type: none"> • VN (275kV) overhead line route • YL (400kV) overhead line route • ZBG (400kV) overhead line route <p><u>Substation</u></p> <ul style="list-style-type: none"> • Littlebrook 400kV Substation <p><u>Underground cables</u></p> <ul style="list-style-type: none"> • There are a number of high voltage underground cables within or in close proximity to the proposed order limits. 		
	Electrical Connection Route			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		
	Safety Electrical Connection Route			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)		

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	Electrical Connection Route			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.		
	Safety			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.		
	Electrical Connection Route			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.		
	Electrical Connection Route			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.		

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	Electrical Connection Route			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.		
	Electrical Connection Route			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.		
	Electrical Connection Route			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		

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The Forestry Commission	Historic Environment	18.06.18	30.07.18	Ancient Woodlands and Ancient or Veteran Trees are acknowledged as an irreplaceable habitat and a part of our Natural Heritage. Mixed broadleaved woodland, wood-pastures and parkland are also regarded as habitats which are principally important for conserving biodiversity.		The Applicant has noted this response and has had regard to such habitats in its Environmental Impact Assessment where they have the potential to be affected by the Proposed Development.
	Historic Environment			A scheme that dissects any woodland, particularly an Ancient Woodland, will not only result in significant loss of woodland, but will also negatively increase the ecological value and natural heritage impacts due to habitat fragmentation, and a huge negative impact on the natural plants and animals' ability to respond to the impacts of climate change.	N	There is no Ancient Woodland within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to Ancient Woodland as a result of the Proposed Development. Furthermore, the full assessment of effects in Chapter 11 of the ES (Document Reference 6.1) takes into consideration the results of modelling of emissions from the ERF Stack during operation, noise monitoring and modelling, and other predicted environmental changes such as surface water and shading which have the potential to have ecological effects.
	Terrestrial Biodiversity			Ensure all sites of the scheme included in survey work are correctly classified by habitat types. This is important to ensure application of the Defra biodiversity metric is used correctly.	Y	Habitat types within the site have been checked and verified through site survey by suitably experienced ecologists (survey undertaken in 2017 and 2018), to inform the assessment, as well as the biodiversity metric calculations.
	Terrestrial Biodiversity			Encourage wider mitigation of any loss of trees and woodlands within the project boundary.	Y	The Applicant would like to keep the removal of trees to the minimum necessary in order to

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						construct, operate and decommission the Proposed Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP. The loss of habitats of ecological value within the REP site will be compensated through provision of replacement habitats within the REP site, as well as a financial contribution to the Environment Bank with a legal agreement for contribution towards enhancement of habitats outside the Application Boundary. A biodiversity metric will quantify the potential habitat losses and gains as a result of REP, in order to determine the extent of off-site compensatory measures required to achieve the aim of net biodiversity gain, in accordance with local and national policy, and consultee comments.
	Terrestrial Biodiversity			Encourage the design of the associate infrastructure (green space, woodlands, public footpaths and cycleways) to build on existing network of green infrastructure linking conurbations to the adjacent countryside. There is a range of options for green infrastructure delivery and the Forestry Commission would draw your attention to what has already been achieved in just 10 years at Jeskyns.	N	The scheme design has been informed by the ecological baseline and scale of ecological impacts delivering a policy compliant scheme. Ecologists have worked in close consultation with Architects and other technical disciplines to determine opportunities for habitat creation and enhancement.

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	Terrestrial Biodiversity			Embed an ‘environmental net gain’ principle for the scheme as promoted in the government’s 25 Year Environment Plan.	Y	A biodiversity metric will quantify the potential habitat losses and gains as a result of REP, in order to determine the extent of off-site compensatory measures required to achieve the aim of net biodiversity gain, in accordance with local and national policy and consultee comments.
	Terrestrial Biodiversity			Locally sourced timber is used in construction of appropriate structures including sound baffles.	N	The Applicant acknowledges this comment and has a preference for sourcing materials locally where available and suitable.
	Terrestrial Biodiversity			For the chosen option, the Forestry Commission would welcome the opportunity to provide advice at the appropriate time to ensure the most appropriate measures are adopted to minimise and / or compensate for the impacts on Ancient Woodlands and woodland habitats of principal importance for conserving biodiversity.	N	There is no Ancient Woodland within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to Ancient Woodland as a result of the Proposed Development. The Applicant would like to keep the removal of trees (including broadleaved woodland - Habitat of Principal Importance (HPI)) to the minimum necessary in order to construct, operate and decommission the Proposed Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction upon habitats of ecological value, where impacts cannot be avoided, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP

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	Terrestrial Biodiversity Historic Environment			<p>The Forestry Commission is the Government Department that works with others to protect, improve and expand our nation's forests and woodland, increasing their value to society and the environment. As recognised in the Making Sure Our Land Plays a Central Role in Capturing Carbon and Enhancing Natural Capital section of the Government's Clean Growth Strategy (Updated April 2018):</p> <p><i>"During the 2020s we need to accelerate the rate of tree planting, working towards our 12 per cent tree cover aspiration by 2060. To do this will require investment by the private and charitable sectors, not just government. A number of our policy proposals will create the conditions for that investment to come forward. We will need new skills in forest design, a reliable supply of resilient planting stock, new opportunities for domestic timber, and a new generation of skilled people helping to enhance our towns, cities and countryside. Recently published natural capital accounts by the Office for National Statistics show that Britain's woodlands provide services of £2.3 billion per year to the economy in terms of recreation, carbon sequestration, timber and air pollutant removal."</i></p>	N	The Applicant acknowledges this comment

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	Planning and Consultation			The Forestry Commission is the Government expert on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms And Procedures) Regulations 2009) for major infrastructure (Nationally Significant Infrastructure Projects (NSIPS)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008). The Forestry Commission neither supports nor objects to development applications. Our role is to provide factual advice on forestry and woodland matters. It is the planning authority's responsibility to give or refuse permission, or to impose conditions.	N	The Applicant has noted this response and confirms that the Forestry Commission has been consulted on the Proposed Development as a prescribed consultee pursuant to s.42(1)(a) of the Planning Act 2008.
	Planning and Consultation			Forest Enterprise (FE) is the arm of the Forestry Commission that manages the public forest estate, ensuring that government policies and regulations are upheld through the management of these sites. Forest Services (FS) arm of the Forestry Commission is the government regulators, ensuring that government's policies and regulations are upheld within the private sector. FS takes the lead on consultation responses for developments that are likely to affect the protection or expansion of all forests and woodlands. Where the public forest estate is likely to be impacted through development, FS	N	The Applicant has noted this response.

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				would liaise closely with our FE colleagues as part of the consultation response submission.		
	Planning and Consultation			The purpose of the Forestry Commission's response is to provide information on areas to be considered as part of the strategic environmental assessment process. We would welcome the opportunity to work with the applicant to identify appropriate measures that will avoid, reduce and / or compensate for significant effects to woodlands due to the construction and operation phases of this Scheme.	N	There is no Ancient Woodland within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to Ancient Woodland as a result of the Proposed Development. The Applicant would like to keep the removal of trees (including broadleaved woodland HPI) to the minimum necessary in order to construct, operate and decommission the Proposed Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction upon habitats of ecological value, where impacts cannot be avoided, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP
	Terrestrial Biodiversity			As outlined in NPS EN-1 Paragraph 5.3.17: Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action. The IPC should ensure that these species and habitats are protected from the adverse effects of development by	Y	The Applicant notes this response and can confirm that the assessment of the potential impacts of the Proposed Development on the natural environment has been undertaken in light of the provisions of NPS EN-1.

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				using requirements or planning obligations. The IPC should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context the IPC should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development.		
	Terrestrial Biodiversity			<p>The Forestry Commission welcomes the recognition that sites protected to the same extent to European sites under Habitats and Species Regulations, either alone or in combination with other plans or projects. Therefore, consideration must also be given to mixed broadleaved woodland (Lowland Mixed Deciduous Woodland), wood-pastures and parkland. Under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, these habitats “are of principal importance for the purpose of conserving biodiversity.” Therefore, these woodland habitats must also be included in all future habitat surveys to ensure adherence to the requirements of the NPS EN-1 report as outlined below:</p> <p><i>Paragraph 5.3.7: As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and</i></p>	N	<p>The Habitats Regulations Assessment (see Document Reference 6.5) provides an assessment in accordance with the requirements of the Habitats Regulations to consider the potential for likely significant effects from REP on the qualifying features of European sites within the zone of influence of the Proposed Development.</p> <p>A full ecological assessment of effects from construction and operation of the Proposed Development has been undertaken in the Terrestrial Biodiversity chapter of the ES against the ecological baseline (see Chapter 11 of the ES, Document Reference 6.1).</p> <p>The baseline ecological data has been collected during the period 2017-2018 and includes a number of important ecological features within the study area, including: designated areas, notable habitats and notable and protected species.</p>

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				<i>geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought.</i>		Habitat types, including woodland, within the site have been checked and verified through survey by suitably experienced ecologists (survey undertaken in 2017 and 2018), to inform the assessment, rather than relying on any pre-existing data sets alone. The applicant can confirm that the design and assessment of the Proposed Development has been undertaken in light of the provisions of NPS EN-1.
	Terrestrial Biodiversity			When reviewing Figures 11.3a-d, Appendix G.1, not all Priority Habitats registered as Deciduous Woodland or Woodpasture & Parkland have been included. For further information, please see the Riverside Energy Park maps 1&2 attached to this response.	N	The Phase 1 habitat mapping is now presented in figures 11.3a-g (Document Reference Chapter 11) for additional clarity. The mapping has been verified against habitat conditions and all priority habitats registered as deciduous woodpasture and parkland have been included. The habitat mapping for the site has been verified against current habitat conditions and mapped using standard phase 1 habitat mapping codes, in accordance with standard practice (Joint Nature Conservation Committee, 2010), rather than relying on any pre-existing data sets alone There is no Ancient Woodland, or Woodpasture & Parkland, within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to these habitats as a result of the Proposed Development.
	Policy			In addition to the regulatory and policy framework outlined in Chapter 11, the Forestry Commission considers the	N	The Applicant has acknowledged this response. There is no Ancient Woodland or veteran trees

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				<p>relevant documents and guidance notes outlined below as being pertinent to this DCO in relation to ancient woodland and veteran trees and should also be included in the report considerations.</p> <ul style="list-style-type: none"> • The UK Forestry Standard (4th edition published August 2017). • Ancient woodland and veteran trees: protecting them from development (last updated January 2018) • Government Forestry and Woodlands Policy Statement (Published January 2013) • Managing ancient and native woodland in England (last updated August 2016) • Natural Environment and Rural Communities Act 2006 (published October 2006) • Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005) • A Habitats Translocation Policy for Britain – (published July 2003) • The Clean Growth Strategy: Leading the way to a low carbon future (Updated April 2018) • A Green Future: Our 25 Year Plan to Improve the Environment (Updated February 2018) • Industrial Strategy White Paper “Building a Britain fit for the future” (Published November 2017) 		<p>within the Order Limits of the REP DCO Application.</p> <p>The policy and guidelines that have been taken into account in the EIA are referenced in each topic chapter of the ES (Document Reference 6.1). All appropriate policy and guidance has been considered in carrying out the EIA where they are of relevance to the potential impacts that the Proposed Development may have. Similarly, relevant guidelines for the proposed mitigation are also referenced in the Outline Biodiversity & Landscape Mitigation Strategy (Document Reference 7.6).</p>

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				<ul style="list-style-type: none"> • Natural England Commissioned Report (NERC 132) Edition 3 (published November 2013) • European Commission Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment (published 2013) • BS 42020:2013 Biodiversity. Code of practice for planning and development (published August 2013) • Ancient and other veteran trees: further guidance on management (published February 2013) • Impacts of nearby development on ancient woodland – addendum (published December 2012) • BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations (published April 2012) • Biodiversity 2020: a strategy for England’s wildlife and ecosystem services (published August 2011). • Natural Environment White Paper “The Natural Choice” (published June 2011) • ‘Making Space for Nature: A review of England’s Wildlife Sites and Ecological Network’(the Lawton Report) (published September 2010) 		

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				<ul style="list-style-type: none"> Impacts of nearby development on the ecology of ancient woodland (published October 2008) Veteran Trees: A guide to good management – (published February 2000) 		
	Terrestrial Biodiversity			The Forestry Commission also considers the relevant paragraphs and guidance notes outlined in the appendices below with respect to biodiversity in planning decisions as being pertinent to any DCO and should be included in a report prepared for considerations.	N	<p>The Applicant acknowledges the information which includes extracts from NPS EN-1. NPS EN-3, NPPG and NPPF. The Applicant outlines in Table 11.1 and subsequent paragraphs of Chapter 11 of the ES (Document Reference 6.1) the requirements of relevant policy documents which have been considered through the EIA and scheme development, including the policies described in the Appendices to the Forestry Commission’s letter.</p> <p>Note that the ES Chapter references NPPF (2018) as the current version of the NPPF, rather than the NPPF (2012) version referenced in the Forestry Commission’s Appendices.</p>
	Terrestrial Biodiversity			The Forestry Commission would welcome the opportunity to provide advice at the appropriate time to ensure the most appropriate measures are adopted to minimise and / or compensate for the impacts on Ancient Woodlands and Habitats of Principle Importance	N	<p>There is no Ancient Woodland within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to Ancient Woodland as a result of the Proposed Development.</p> <p>The Applicant would like to keep the removal of trees (including broadleaved woodland HPI) to the minimum necessary in order to construct, operate and decommission the Proposed</p>

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						Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction upon habitats of ecological value, where impacts cannot be avoided, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP.
	Terrestrial Biodiversity			The Forestry Commission notes the ecological impact assessment will be guided by the Chartered Institute of Ecology and Ecological Management best practice guidance. We would suggest that for woodlands, the Woodland Condition Assessment (WCA) guidance and forms available on the Forestry Commission's website is used. This has been developed by the England Woodland Biodiversity Group. This WCA is suitable for your ecological consultants to use as it is broad in scope and suitable for use with all woodland types. If a BS5837:2012 Cascade chart is used to carry out a tree quality assessment, ancient woodland sites would automatically be classified as A3 due to their natural heritage and ecological value.	N	The link provided by the Forestry Commission letter (reference no. 10) relates to finding out about funding to create native woodland or restore plantations on ancient woodland sites near to the HS2 route, which is not relevant to the proposed development. There is no Ancient Woodland within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to Ancient Woodland as a result of the Proposed Development.
	Terrestrial Biodiversity			As recognised in the European Commission Guidance on Integrating Climate Change and Biodiversity into	N	Consideration is given to additional potential influences of climate change on the baseline within the full ecological assessment presented

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				Environmental Impact Assessment, “climate change and biodiversity are generally complex issues with long-term impacts and consequences. EIAs that aim to properly address biodiversity and climate should take this into account and assess the combined impact of any number of different effects. This requires an understanding of evolving baseline trends and an assessment of the cumulative effects of the project on the changing baseline.”		in Chapter 11 of the ES (Document Reference 6.1) . In addition, the ‘other developments’ with the most potential for simultaneous construction effects are identified in Chapter 4 and Appendix A.4 of the ES. Chapter 11 of the ES identifies and assesses ‘other developments’ where the potential for cumulative biodiversity effects have been identified. Further, Chapter 16 of the ES considers the potential for in combination effects to arise.
	Terrestrial Biodiversity			To meet these requirements, the Forestry Commission would like to reiterate the importance of all woodlands in making our rural and urban landscapes more resilient to the effects of climate change and contribution to wider climate change adaptation. Consideration for how sustainable woodland creation and management of England’s Woodlands can be secured and the use of timber as a construction material is utilised within this scheme will secure the role that woodlands have in reducing greenhouse emissions and carbon sequestration.	Y	Consideration is given to additional potential influences of climate change within the full ecological assessment presented in Chapter 11 of the ES (Document Reference 6.1) . The Applicant would like to keep the removal of trees (including broadleaved woodland HPI) to the minimum necessary in order to construct, operate and decommission the Proposed Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction upon habitats of ecological value, where impacts cannot be avoided, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP. Cory has a preference to use locally sourced materials including timber where available and suitable. A biodiversity metric calculation is being undertaken by the Environment Bank to enable

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						<p>a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. However, as no woodland loss will result from the Proposed Development, is not considered that woodland creation is required.</p> <p>Existing green infrastructure and green space adjacent to the site has been considered within the assessment. Ecologists have worked in close consultation with architects and other technical disciplines to determine opportunities for habitat creation and enhancement described in this Chapter.</p>
				<p>The Forestry Commission would also encourage the inclusion of measures to build the evolving network of green infrastructure to link the existing conurbations to adjacent countryside. Assessment of the impact of such positive inclusions should be part of the scoping of wider carbon balance and community health & wellbeing. This will aid the promotion of and help encourage people to access the countryside by the local community for quiet enjoyment – important factors for health and wellbeing, both physical and mental health. There are a range of options for green infrastructure and the Forestry Commission would bring attention to what has been achieved at Jeskyns. Linking sites similar to the Jeskyns</p>	N	

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				model to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of landscape scale green infrastructure.		
	Terrestrial Biodiversity			<p>The report has highlighted that a biodiversity metric will be used to determine the value of habitats affected by the Proposed Development, and whether off site compensation will be required to secure biodiversity gain. The Forestry Commission would suggest the use of the Defra biodiversity offsetting metric.</p> <p>The Forestry Commission would welcome the opportunity to provide advice at the appropriate time to ensure the most appropriate measures are adopted to minimise and / or compensate for the impacts on Ancient Woodlands and Habitats of Principle Importance.</p>	Y	<p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments.</p> <p>The biodiversity metric calculation used by the Envirobank is based on the old Defra metric.</p> <p>Options for offsetting will be determined to local biodiversity priorities, initially through discussion with the LBB and then with third party landowners.</p>
	Terrestrial Biodiversity			<p>Determining the Importance of Ecological Features This section of the report has highlighted that features important within a 'Local' context or above require full consideration in the impact assessment. Therefore, as habitats of principally important, habitats registered on MAGIC as deciduous woodland and woodpasture & parkland priority habitats as highlighted in the attached MAGIC maps must be fully recognised and</p>	N	<p>The Applicant can confirm that the habitat types noted in the response have been incorporated into the ecological assessment presented in Chapter 11 of the ES (Document Reference 6.1).</p>

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				incorporated into the impact assessment.		
	Terrestrial Biodiversity			This section of the report and associated tables outlines the observations made during site checks. The Forestry Commission would recommend clarity of data observed on the ground vs designations of the sites. For example, Lesnes Abbey Wood LNR (Table 11.5) has correctly recognised the LNR as an area of ancient woodland; however, Abbey Wood SSSI (Table 11.4) as well as the designation for its fossil deposits, this site is also an area of ancient woodland – see attached Lesnes Abbey map.	N	The Applicant acknowledges this comment. The designated site boundaries and criteria have been checked and updated as appropriate.
	Terrestrial Biodiversity			Clarity for Crossness LNR (Table 11.5) is also required. In the report, the site description states: “Other habitats include a network of ditches and open water, scrub and rough grassland”. However, as shown in Figure 11.3a of Appendix G, and confirmed in the attached Riverside Energy Park map 1, this site contains an area of Deciduous Woodland Priority Habitat.	N	The Applicant acknowledges this comment. The designated site boundaries and criteria have been checked and updated as appropriate. The habitat mapping for the site has been verified against current habitat conditions.
	Terrestrial Biodiversity			Ancient woodlands and veteran trees are included in the list of protected species as highlighted on the Natural England website	N	The Applicant acknowledges this comment.
	Policy			As highlighted in the Natural Environment section of the National Planning Practice Guidance (NPPG) under Biodiversity and ecosystems:	N	There is no Ancient Semi-Natural Woodland or Plantations on Ancient Woodland Sites within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to

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	Terrestrial Biodiversity			<p><i>“Both Ancient Semi-Natural Woodland (ASNW) as well as Plantations on Ancient Woodland Sites (PAWS) are ancient woodland. Both types should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework.”</i></p> <p>All ASNW, PAWS and ancient woodland areas should be included in the study area to:</p> <ul style="list-style-type: none"> • ensure these areas are treated equally in terms of protection afforded to ancient woodlands; and, • to secure the future of one of the most diverse ecosystems in perpetuity. 		such habitats as a result of the Proposed Development.
	Terrestrial Biodiversity			As outlined in the NPPG, it is important to recognise ASNW and PAWS have the same status as ancient woodlands. Including these sites within the study area will ensure these irreplaceable habitats continue to provide local ecological networks important for securing and enhancing ecosystem services including biodiversity, and for holding nature conservation value of the area.	N	There is no ASNW or PAWS within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to ASNW or PAWS as a result of the Proposed Development.
	Terrestrial Biodiversity			In line with the NPPG, the Forestry Commission recommends that these tables clearly defines the status of all ancient woodland sites, Ancient Semi-Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS),	N	There is no ASNW or PAWS within the Order Limits of the Proposed Development and, therefore, there will not be a direct effect to Ancient Woodland as a result of the Proposed Development.

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				<p>veteran trees and woodland habitats recognised as a habitat of principal importance under Section 41 of the NERC Act 2006 are included in all survey work and study reports. Further clarity regarding sites described as containing scrub¹⁷ is also sought. This additional information will ensure that a thorough assessment will acknowledge the impacts on any potential losses of irreplaceable and important woodland habitats.</p>		<p>The Applicant would like to keep the removal of trees (including broadleaved woodland HPI) and other semi-natural habitats such as scrub to the minimum necessary in order to construct, operate and decommission the Proposed Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction upon habitats of ecological value, where impacts cannot be avoided, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP. The Outline Biodiversity & Landscape Mitigation Strategy also confirms that measures to protect trees within and immediately adjacent to the Application Site boundary would be undertaken in line with BS5837:2012 Trees in relation to design, demolition and construction.</p> <p>Furthermore, the full assessment of effects in Chapter 11 of the ES (Document Reference 6.1) takes into consideration the results of modelling of emissions from the ERF Stack during operation, noise monitoring and modelling, and other predicted environmental changes such as surface water and shading which have the potential to have ecological effects beyond the Order Limits.</p>

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	Terrestrial Biodiversity			<p>The Forestry Commission advise that in respect of loss of any woodland, particularly the loss of irreplaceable and principally important habitats and ecosystems must be included in the test of public benefit to demonstrate accurately that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm. Any loss of woodland must be adequately compensated to ensure overall net deforestation resulting from this scheme is avoided.</p>	Y	<p>There is no Ancient Woodland within the Order Limits of the Proposed Development and, therefore, there will be no direct loss of Ancient Woodland as a result of the Proposed Development.</p> <p>The Applicant would like to keep the removal of trees (including broadleaved woodland HPI) and other semi-natural habitats such as scrub to the minimum necessary in order to construct, operate and decommission the Proposed Development. An Outline Biodiversity & Landscape Mitigation Strategy has been prepared (Document Reference 7.6). This Strategy sets out measures to mitigate ecological effects during construction upon habitats of ecological value, where impacts cannot be avoided, along with details of reinstatement of construction areas, and opportunities to provide enhancements both within and outside REP The Outline Biodiversity & Landscape Mitigation Strategy also confirms that measures to protect trees within and immediately adjacent to the Application Site boundary would be undertaken in line with BS5837:2012 Trees in relation to design, demolition and construction.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in</p>

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						<p>accordance with policy and consultee comments.</p> <p>The biodiversity metric calculation used by the Envirobank is based on the Defra metric.</p> <p>Options for offsetting will be determined to local biodiversity priorities, initially through discussion with the LBB and then with third party landowners.</p>
	Terrestrial Biodiversity			<p>For the loss of any woodland, the Forestry Commission would ask:</p> <ul style="list-style-type: none"> To explore with you how this loss could be further reduced and how direct and indirect impacts on ancient woodlands can be minimised; How best to target the creation of new woodland to compensate for the loss of trees and woodlands; <p>That the applicant engages with the Forestry Commission at the earliest opportunity so that our expertise can be used to support the development of options and design of the chosen way forwards.</p>	Y	A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. As per the comment above.
	Terrestrial Biodiversity			Outlined above are the key areas of information would be required in order to allow the applicant to proceed with delivery of this scheme with least	Y	The Applicant has addressed the specific elements raised in its responses above.

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				detrimental impact to the surrounding environment. Also for the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and/or to flesh out compensation proposals to provide a sufficient degree of confidence as to their efficacy.		
	Terrestrial Biodiversity			Forestry Commission's headline points are that on the basis of the information submitted, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently compensated, as proposed in the proposed Code of Construction Practice.	Y	<p>Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity. No likely residual significant effects were identified.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (Document Reference 7.6) and an outline Code of Construction Practice (Document Reference 7.5) will be included as part of the application to delivery any mitigation measures required.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall biodiversity net gain in accordance with policy and consultee comments.</p>
Ministry of Defence	Safety	14.06.18	30.07.18	On reviewing the application plans, I can confirm that the MOD has no safeguarding objection to this proposal.	N	The Applicant has noted this response.
Defence Geographic Centre	Aviation	27.06.18	30.07.18	We here at DGC are concerned with the safeguarding of low flying aircraft. To this end, we maintain and disseminate a	Y	Potential impacts upon aviation during both the construction and operational phase of REP are

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				<p>database of potential obstructions to low flying aircraft called “DVOF” (Digital Vertical Obstruction File). In order to ensure this database is up to date, and to safeguard your project, we would be grateful if you could keep us updated regarding any cranes at the site and of any building works that reach 75 feet or more above ground level. Those are the criteria we use for including items in our database. If you do this for us then we can liaise with the RAF and the Civil Aviation Authority to ensure that aircraft are aware of your site.</p>		<p>discussed in Chapter 15 of the ES (Document Reference 6.1).</p> <p>Whilst details of construction plant (including cranes) has not yet been finalised, DCG and the Civil Aviation Authority AR section will be notified of any crane above 75 ft AGL. The requirement to notify the Defence Geographic Centre and Civil Aviation Authority is included within the outline CoCP (Document Reference 7.5).</p>

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Table 2: Responses and regard had to responses from Local Authorities identified in accordance with section 43 of the PA 2008 (for the purposes of section 42(1)(b))

Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
Dartford Borough Council	Transport	13.06.18	30.07.18	The Borough Council, as you will be aware, is primarily concerned about the impacts during both the construction and operational phases on the A206 Bob Dunn Way and junction 1A of the M25 and the consequent reassignment of traffic onto local road networks and through the town centre but also the impact from any increased congestion or delay in Fastrack times on local residents and businesses to the north of Bob Dunn Way and the wider area.		The Applicant was aware of these concerns through non-statutory consultation. The Applicant's responses to these issues are set out in more detail below.
	Transport			The Council notes that the Transport Assessment will model for the "worse case" scenario of 100% waste being brought in by road. This is welcomed but the assessment should also include consideration of incidents on the wider network and the resulting congestion e.g. at junction 1a and the impact that additional traffic may have on reassignment of traffic to the local network at the time of incidents.	N	The Applicant acknowledges this response. However, the quantum of traffic generated by the operation and construction phases of REP would not create a perceptible impact on the network at A282/M25 junction 1a such that traffic is reassigned. Section 6.12 of the ES (Document Reference 6.1) considers the implications of incidents on the network. No likely residual significant effects were identified.
	Transport			The Council supports the Cory's intention to utilise the River Thames to transport material, as this has the potential to significantly reduce the	N	The Applicant notes this comment.

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				volume of additional HGV's on the road network.		
	Transport			<p>The Council has sent through details of committed and cumulative developments in the Borough to be included within the Transport Assessment. But as you may be aware the proposal for the Strategic Rail Freight Interchange at Howbury Park is currently at Public Inquiry. Since the proposal is likely to be operational in 2024, we would also request that they assess the traffic impacts in the event that Howbury Park is granted permission and is operational at that time.</p>	N	<p>The Transport Assessment (Document Reference B.1) has included the committed developments provided by Dartford Borough Council, where the level of movements on the assessed network is judged to be significant (e.g. in excess of 50 vehicles during the peak period). However, this does not include Howbury Strategic Rail Freight Interchange. DBC officers acknowledged this stance at the meeting of 03 October 2018.</p> <p>On initial review the predicted impact from Howbury Strategic Rail Freight Interchange would not materially alter the impacts on the junctions within the vicinity of REP. The Howbury Strategic Rail Freight Interchange development would lie to the south and east of REP with its transport focus on the strategic network further to the east and south of Howbury. The TA for that development indicates at 2031 in the order of 90 movements in the am peak at the Northend Road/ Perry Street roundabout. Only a proportion of this flow would route via Picardy Manorway – the route tested within the operational phases for the REP TA and ES. The resultant movements at Picardy Manorway would be in the order of 40 movements in the a.m. peak (based on observed traffic data). These 40 movements would represent approximately 1% of traffic at the Picardy Manorway junctions in the a.m. peak</p>

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						and are unlikely to result in a material change to the operation of the network. Similarly, the level of operational transport impact generated by REP towards the Howbury development and A282 junction 1a would not be significant, and as such has not been specifically tested.
	Transport			At present, the Council considers that insufficient detail has been provided to enable us to support the report's conclusion that there would be a negligible effect on all receptors during the operational phase.	Y	Since consulting on the PEIR the Applicant has completed its assessment of the Proposed Development's impacts on the highway network. Effects during the operational phase of REP are considered in the Transport Assessment (Document Reference 6.3, Appendix B.1) which concludes that operational effects will be Not Significant.
	Transport			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. The Council notes that this will be included as part of the Transport Assessment and until such time as the information is available it is difficult to comment further.	Y	The Applicant acknowledges this response, however it has been agreed with Dartford Borough Council and Kent County Council planning officers during a pre-application meeting (see Appendix C of the Consultation Report, Document Reference 5.1) that the expected traffic flows generated by the Proposed Development are insufficient to require assessment of the A282 Junction 1A. Therefore, this junction has not formed part of the Transport Assessment.
	Transport			The Council would seek mitigations to reduce construction traffic impact by ensuring that where possible construction materials arrive by river and	Y	The Transport Assessment carried out indicates that opportunities are to be taken for river transport, where feasible for construction (see Appendix B.1 of the ES (Document

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				that there are controls over HGV routing to the site during construction.		<p>Reference 6.3). However, the Transport Assessment assumes, as a reasonable worst case, the peak period of the construction programme (Month 13). This period of construction includes the movement of an additional proportion of materials by river.</p> <p>The outline CTMP, secured by a requirement in the draft DCO, details mitigation relating to construction traffic and prescribed routing.</p>
	Electrical Connection Route Options			<p>The Council notes that work is on-going to determine the final routing of the electrical connection and the details of the construction. As this is the part of the scheme within the DBC area the Council does not feel it can provide detailed comments until the routing is known. The Council will need to understand the detail of the impacts of the road closures on the traffic in the area and the routing of Fastrack, as well as the physical impacts on archaeology and biodiversity. Without the detailed information the Council is unable to comment further.</p>	Y	<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>The ES (Document Reference 6.1) considers all possible route options, including with regard to Terrestrial Biodiversity (Chapter 11) and Historic Environment (Chapter 10). No residual environmental effects were identified.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>

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						<p>The detail of the phased delivery of the Electrical Connection and the temporary implications on bus services would be agreed with Dartford Borough Council and Kent County Council through the of the sequencing UKPN works. However, a full closure on the Fastrack route is not anticipated.</p> <p>It was discussed through consultation with DBC and KCC that the final CTMP secured in the draft DCO (Document Reference 3.1) would address possible temporary lane closures.</p> <p>A qualitative review is provided in Section 6.9 of Chapter 6 of the ES (Document Reference 6.1), considering the possible interaction and impact on the Fastrack service, including reference to a possible increased service frequency of Fastrack Route A.</p> <p>The CTMP, to be agreed with the LHA and LPA, would set out the details and phasing of the delivery of the Electrical Connection, including temporary lane closures. This would identify the period of impact on the Fastrack service. An initial commentary on the likely impact on Fastrack Route A is given at Section 6.9.69 to 6.9.73 of the ES (Document Reference 6.1).</p>
	Transport			With regard to the proposed routing along Bob Dunn Way the assessment should assess the impact of the lane closure, not only during normal traffic	Y	Chapter 6 of the ES (Document Reference 6.1) includes an assessment of the qualitative impact of the construction of the Electrical Connection.

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				<p>conditions but also when an incident occurs on the strategic network and the traffic queues that could result and the consequent potential reassignment of cars onto the local road network and through Dartford town centre.</p>		<p>The works would be mobile and temporary and so a quantitative assessment is not possible.</p> <p>The Electrical Connection would be located underneath one lane of traffic at any given location. Where crossing from one lane to the other would be required, lane closures would be managed accordingly. Therefore, construction would, in the westbound or eastbound carriageway along Bob Dunn Way, typically only cause direct disruption to that flow direction.</p> <p>Section 6.9 of the ES (Document Reference 6.1) considers the interaction of the construction phases of REP with road incidents. By its nature an “incident” on the strategic network is unplanned and unquantified and so there are an infinite number of resultant impacts. Based on professional judgement it is considered that a disruption to the network is not a matter that can reasonably be assessed against, given that this affects the entire traffic flow at any random point of disruption, regardless of origin and destination. Without prejudice to this assertion, a qualitative consideration is included in Chapter 6 of the ES (Document Reference 6.1) and the TA (Appendix B.1 of the ES, Document Reference 6.3) as requested.</p> <p>It is concluded that the likelihood of the Electrical Connection works coinciding with an incident to then cause vehicles to divert to routes through Dartford is low and should not require detailed quantitative analysis.</p>

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	Transport			<p>The Environment Impact Assessment should also consider the socio-economic impact of such queuing on the residents and businesses of the Bridge who have to use Bob Dunn Way for access. Since Bob Dunn Way leads to the M25 and the Dartford Crossing traffic incidences on this strategic network can quickly result in queuing along Bob Dunn Way as well as across the wider area. 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.</p>	Y	<p>Chapter 6 of the ES (Document Reference 6.1) presents an assessment of likely significant traffic and transport effects from the construction and operation of the Proposed Development, including the Electrical Connection.</p> <p>The impact of the delivery of the Electrical Connection would be the same as the delivery of a standard utility run, which due to the nature of such works have the potential to cause interruptions. The specific link identified has been assessed for impacts of driver delay within Chapter 6 of the ES (Document Reference 6.1). Such an assessment is considered to act as a proxy for Socio-economic effects. No likely residual significant effects were identified in either assessment.</p> <p>An assessment of socio-economic effects associated with the Proposed Development is provided in Chapter 14 of the ES (Document Reference 6.1).</p>
	Transport			<p>As well as the impact from construction work in the Borough, the Council consider there is likely to be impact on traffic in the Borough as a result of lane closures for the route along Thames Way in the London Borough of Bexley and so will also be seeking to consider the detailed assessment of these impacts and the detailed routing, with particular regard to the impacts on the constraint caused by the Craymill Bridge.</p>	Y	<p>The impact of the delivery of the Electrical Connection would be localised at the working area and traffic management arrangements typical of a utility installation under existing roadworks and permitted development rights of statutory undertakers would be implemented. An assessment of impacts relating to the Electrical Connection on the network as agreed within the TA scoping is presented in Section 6.9 of the ES (Document Reference 6.1) and within the TA (Appendix B.1 of the ES, Document Reference 6.3).</p>

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	Transport			The other route option is along the Fastrack route, which is a dedicated rapid transit bus route through the Bridge development and across the Borough. The Council would request that the impact of any lane closures on Fastrack operation is considered, not only through the Bridge but on its wider route. This should also take into account that the service frequency for Fastrack A is likely to have increased by 2022.	Y	<p>A qualitative review is provided in Section 6.9.69 of Chapter of the ES (Document Reference 6.1), considering the possible interaction and impact on the Fastrack service, including reference to a possible increased service frequency of Fastrack Route A. No likely significant residual effects were identified.</p> <p>It was discussed through consultation with DBC and KCC that the final CTMP secured in the draft DCO (Document Reference 3.1) would address possible temporary lane closures.</p> <p>The CTMP, to be agreed with the LHA and LPA, would set out the details and phasing of the delivery of the Electrical Connection, including temporary lane closures. This would identify the period of impact on the Fastrack service.</p>
	Historic Environment			The PEIR indicates that an archaeological watching brief will be implemented along the length of the electrical connection construction route. This is likely to be acceptable where the routing is within the existing road corridor where there has already been disturbance. But as the details are not known yet and there may be a need for diversion around structures, it could be that the cabling will go into untouched land. In such cases, the Council would normally expect further archaeological investigation.	Y	<p>Section 10.9 of the ES (Document Reference 6.1) and the archaeological desk-based assessment (DBA) (Appendix F.1, Document Reference 6.3) identify areas of the Electrical Connection route options where further archaeological investigations may be required.</p> <p>If required, a Written Scheme of Investigation (WSI) will be submitted to and approved by the relevant planning authorities. The WSI would identify any areas where further archaeological investigations are required; the nature and extent of the investigation required; and provide details of the measures to be taken to protect, record or preserve any significant archaeological</p>

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						<p>features that may be found. The need for a need for a WSI will be secured in Requirement 7 of the draft DCO (Document Reference 3.1).</p> <p>Prior to the publication of the PEIR the draft DBA was submitted to the archaeological advisor to KCC. The scope of the assessment was endorsed. The DBA has been updated to include a more detailed impact assessment and reflect slight changes to the scheme. The updated assessment has been approved by KCC.</p>
	Historic Environment			The Council will need to understand the detail of the impacts of the road closures on the traffic in the area and the routing of Fastrack, as well as the physical impacts on archaeology and biodiversity. Without the detailed information the Council is unable to comment further.	Y	<p>Chapter 10 of the ES (Document Reference 6.1) and DBA (Appendix F.1, Document Reference 6.3) has identified areas of the Electrical Connection route options where further archaeological investigations may be required see Section 10.9.18 of the ES.</p> <p>If required, a Written Scheme of Investigation (WSI) identifying any areas where further archaeological investigations are required; the nature and extent of the investigation required; and providing details of the measures to be taken to protect, record or preserve any significant archaeological features that may be found, must be submitted to and approved by the relevant planning authority prior to commencement of the authorised development. The need for a WSI, if required, is secured in Requirement 7 of the draft DCO (Document Reference 3.1).</p> <p>DBC made clear in their response that it uses KCC officers to provide technical advice with</p>

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						regard to archaeology and that it would support any comments that KCC make with regard to these matters. Prior to the publication of the PEIR the draft DBA was submitted to the archaeological advisor to KCC. The scope of the assessment was endorsed. The DBA has been updated to include a more detailed impact assessment and reflect slight changes to the scheme. The updated assessment has been approved by KCC.
	Air Quality			The initial assessment indicate the traffic generation by the development is likely to be low and with the improvement in emissions there is likely to be negligible. However, this is something that will need to be assessed fully following the detailed assessment taking into account the Council's requests with regard to modelling of an incident on the road network. 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.	N	Section 7.9 of the ES (Document Reference 6.1) confirms air quality impacts from road traffic emissions have been assessed where the changes in traffic are significant. The assessment is based on an annual average basis as annual mean NO2 concentrations are the most significant. Compliance with short term objectives are assessed in comparison to the annual mean objective, as explained in the ES Chapter. The impact of increased traffic has been considered where the increase in traffic is significant (this excludes the Dartford Crossing). However, an incident on the road network will cause temporary changes in traffic which will not impact upon the annual mean traffic flows and predicted annual mean concentrations within the assessment. Incidents on the road network will therefore not change the significance of the predicted air quality effect. As demonstrated in Section 7.9 of Chapter 7 , AQMAs have been considered where there is the potential for effects associated with Air Quality from REP. This includes the AQMA at the Dartford

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						Crossing. The assessment in the ES concluded that effects were 'not significant'.
	Other			The Council notes that Kent County Council will also be responding to the consultation and would advise that as they are the local highway authority for the area the Borough Council will work with them with regard to the transport impacts of the development. The Borough Council also use KCC officers to provide technical advice with regard to archaeology and biodiversity and would support any comments that KCC make with regard to these matters.	N	The Applicant acknowledges this response and has liaised with KCC as well as DBC throughout the development of the Application.
London Borough of Bexley	Transport	13.06.18	30.07.18	The Preliminary Environmental Information Report (PEIR) sets out the structure of the Emerging Environmental Assessment (EIA) which will accompany the future DCO application. The EIA will contain a Transport Assessment (TS) the scope of which has been the subject of previous discussions and a meeting with the applicant.	N	The Applicant agrees with this comment.
	Transport			The majority of the issues raised in the scoping discussions will be addressed in the final Transport Statement (TS). However it is disappointing that a review to consider the possibility of providing a right turn entry into Norman Road from Picardy Manorway will not be explored as the applicant does not believe this to be warranted.	N	The suggestion put forward by LBB for potential cross connection on Picardy Manorway to Norman Road has been discussed during stakeholder meetings with LBB. The scale of the Proposed Development's impact on Picardy Manorway is not sufficient to require the implementation of a new junction at this point.

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	Transport			There are concerns that the number of potential operational vehicle movements that could be generated by these proposals are being underestimated and therefore the impact on the highway network not fully considered.	N	<p>The Transport Assessment (TA) (Appendix B.1 of the ES, Document Reference 6.3) has based operational vehicle movement predictions on experience from RRRF.</p> <p>REP is anticipated to be a predominately river fed facility, maximising the use of the existing jetty and Cory's river infrastructure. However, the operational predictions for 100% waste import by road are considered to be a reasonable worst case. The derivation of the predictions has been shared with stakeholders through the TA scoping exercise, the PEIR and is now explained within Chapter 6 of the ES (Document Reference 6.1) and in the TA (Appendix B.1 of the ES, Document Reference 6.3). It should be recognised that it is likely that the movements are over estimated as they are based on 805,920 tpa (reasonable worst case scenario) rather than the nominal throughput of 655,000 tpa. Additionally, they are assessed on 100% by road basis when, in reality, this is highly unlikely. The Applicant therefore considers the assumptions underpinning the TA to be precautionary.</p>
	Transport			Table 6.19 indicates that an additional 321 vehicles per day would use Norman Road in the worst case scenario (i.e. 100% of the additional waste being transported by road). However Plate 6.1 and 6.3 indicates that there could be approximately 331 RCVs per day visiting the site to deliver waste to the ERF and Anaerobic Digestion Facility. There will	N	Table 6.11 in the ES (Document Reference 6.1) provides an updated projection of the daily operational traffic flow for goods vehicles and worker traffic. The assessment uses RCVs which have a lower capacity by volume, requiring more movements in comparison to articulated vehicles which would be more likely to be used. Therefore, the assessment includes a particularly conservative 100% by road scenario on vehicle movement associated with

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				<p>also be staff vehicles. In addition if the waste were to be delivered by RCVs (waste collection vehicles) these are unlikely to operate 24 hours and for 7 days a week. It is noted that the previously submitted TS Scoping Note indicated that Bexley RCVs would operate for five days a week and 12 hours a day only. This would result in a higher concentration of vehicle movements over a given day.</p>		<p>the waste import stream – which would occur on a 24hr basis. Other sundry movements would occur only during the daytime and workers would travel to and from REP at shift changes in the morning and evening.</p>
	Air Quality			<p>The PEIR finds that the main effects during construction of the development include the potential generation of dust and that this can be controlled through standard mitigation techniques.</p> <p>Whilst there will be additional traffic associated with the construction phase of the development, the report finds that the additional traffic volumes are unlikely to lead to significant air quality effects. Furthermore, the construction traffic levels are said to be less than the operational traffic levels which have been modeled in the assessment of operational effects and which have been shown to not have significant impact on the environment.</p> <p>No undue odour impacts are expected and there have been no complaints received by the applicant for the RRRF since it opened in 2011.</p>	N	<p>The findings of the air quality assessment are presented in Chapter 7 of the ES (Document Reference 6.1). The air quality assessment has concluded that the Proposed Development will not result in any likely significant environmental effects in relation to air quality.</p> <p>Dust will be controlled through measures included in the Code of Construction Practice (CoCP), which is secured through requirement 11 of the draft DCO.</p> <p>The Applicant can confirm that no undue odour impacts are expected for REP and that there have been no complaints received for the RRRF since it opened in 2011.</p>

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				<p>The main air quality effects from the development will be from emissions from the Energy Recovery Facility. These are not found to be significant in terms of impact on human health or ecological receptors. The effects have also been considered in conjunction with emissions from the existing RRRF and Crossness Sewage Sludge Incinerator and no exceedances of relevant assessment levels have been predicted.</p> <p>Furthermore, there are not expected to be any significant effects from the emissions from the Anaerobic Digestion Facility.</p> <p>Waste would be delivered to REP by river or road or both. The transport of waste is not anticipated to give rise to significant effects on air quality.</p> <p>The methodologies undertaken and conclusions of these reports are considered to be acceptable. It is noted that further assessment work will be undertaken the results of which will be identified within the finalised Environmental Statement that will accompany the formal DCO application.</p>		
	Noise and Vibration			Chapter 8 of the Preliminary Environmental Information Report details acceptable responses to the	N	Target criteria and methodologies agreed with LBB have been used within this assessment. The noise assessment conclusions are identified

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				<p>noise issues arising from the development proposals at the screening phase. In particular the applicant has fully accepted the target acoustic criteria specified by the Council. The assessment concludes that the noise and vibration associated with the construction and decommissioning and operation of the proposed development would have negligible effects on the closest dwellings. Similarly, the effects from the construction of the Electrical Connection are considered to be Negligible and not significant due to mitigation measures which would be applied. The methodologies undertaken and conclusions of these reports are considered to be acceptable.</p>		<p>in Section 8.13 of the ES (Document Reference 6.1) and are in accordance with those matters noted in the Council's consultation response.</p>
	<p>Townscape and Visual Impact</p>			<p>The townscape and visual impact assessment assesses the impacts of the proposed development on various visual receptors around the site as well as long-distance views. The assessment assumes a “worst case scenario” in terms of building height and stack height. It is noted that in ‘Chapter 16 Summary of Preliminary Findings and In-combination Effects’, table 16.1 shows that effects are on the whole not considered to be significant, with the exception of a moderately significant to the townscape and visual impact.</p>	<p>N</p>	<p>The effects noted in the response relate to those reported in the PEIR. A full Townscape and Visual Impact Assessment (TVIA) has been undertaken and the findings are presented in Chapter 9 of the ES (Document Reference 6.1).</p>

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	Townscape and Visual Impact			The preliminary conclusions of 'Chapter 9 Townscape and Visual Impact Assessment', paragraph 9.12 confirm that there is potential for further mitigation by careful choice of building form; materials; massing; roofline etc. The appearance, height, scale and massing of the building and the stack will all need to be carefully considered. A design which proposes the minimum building mass and height required for the operations which will be carried out internally, together with a design that is able to maximise solar generation, is encouraged. It is understood that further details are to be set out within the Environmental Statement and the Design and Access Statement, which be submitted as part of the Development Consent Order.	Y	The TVIA in Chapter 9 of the ES (Document Reference 6.1) considers the Proposed Development against the relevant townscape and visual effects assessment requirements of the National Policy Statements (NPS EN-1, NPS EN-3 & NPS EN-5). Embedded mitigation is provided by the Design Principles (Document Reference 7.4) detailing the design process of materials selection and Context Colour Pallettes to integrate the development into the context of its surroundings. The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and has been developed following a consideration of the environmental and other constraints of the site, as explained in the Design and Access Statement (Document Reference (Document Reference 7.3)).
	Townscape and Visual Impact			It is noted that viewpoints 2 (Public Right of Way between Crossness Nature Reserve and Thames Path National Trail) and 3 (Public Right of Way in Crossness Nature Reserve) were not able to be assessed for the purposes of the PEIR due to the path being closed. These should be assessed and included in the final report.	Y	The Townscape and Visual Impact Assessment (Chapter 9 of the ES, Document Reference 6.1) includes viewpoints 2 and 3. The PRoW was re-opened prior to the preparation of the TVIA (see Section 9.9).
	Townscape and Visual Impact			The final assessment should also provide images of the proposed development in the form of	Y	Accurate Visual Representations (AVRs) as wireframes have been prepared and demonstrate the maximum parameters of the

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				photomontages or wireline diagrams or both. Digital 3D modelling, which is useful in showing what the effects of a development are over a large area, should also be carried out.		Proposed Development. The AVRs are included as part of the TVIA in Appendix E.2 of the ES (Document Reference 6.3). The 3D model that was produced for the Proposed Development was utilised to prepare the visualisations and therefore is considered to have informed the TVIA.
	Historic Environment			There are several designated and built heritage assets in the vicinity of the REP site including the Crossness Conservation Area, the Grade I listed Crossness pumping station, two Grade II listed workshops at Crossness Pumping Station, a locally listed engine house at Crossness Sewage Treatment Work, the Grade II listed jetty at Dagenham Docks and the scheduled and grade II listed Lesnes Abbey, approximately 1.5 km south-west of the site.	N	<p>Some of the comments raised by London Borough of Bexley (LBB) during statutory consultation refer to the Scoping Document and were subsequently addressed during the production of the PEIR. The Applicant raised this with LBB and LBB were given the opportunity to re-comment on the potential impacts on heritage assets during the Supplementary Information to the Preliminary Environmental Report (PEIR) consultation. LBB's updated comments and the Applicant's response are summarised in Appendix J.3 of the Consultation Report (Document Reference 5.1).</p> <p>All heritage assets identified by LBB, Crossness Conservation Area, the Grade I listed Crossness pumping station, two Grade II listed workshops at Crossness Pumping Station, a locally listed engine house at Crossness Sewage Treatment Work, the Grade II listed jetty at Dagenham Dock and the scheduled and grade II listed Lesnes Abbey, have been assessed within Chapter 10 of the ES (Document Reference 6.1).</p>

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	Historic Environment			As per the Townscape and Visual Impact Assessment, the assessment of the impact the development will have on designated and non-designated heritage assets assumes a “worst case scenario” in terms of building and stack height. The report finds that the potential effects of the proposed development on the historic environment during construction, decommission and operation are likely to be negligible and not significant.	N	Section 10.9 of the ES (Document Reference 6.1) considers the likely significant effects of the Proposed Development on known archaeological features. The results of the assessment concluded that the effect of the Proposed Development on the historic environment were negligible – minor and Not Significant.
	Historic Environment			Crossness Conservation Area, associated listed buildings and Lesnes Abbey are identified as heritage assets potentially affected by the development within table 7.5.1. While the proposed development is at some distance from these assets and that the local area has been predominantly industrial in character for some time, it is considered that the assessment of any effects on the setting of these assets is underplayed in the methodology as set out.	N	The Applicant has noted this comment, however LBB’s comment refers to Table 7.5.1 of Scoping Report as opposed to the PEIR (see Appendix A.1 of the ES, Document Reference 6.3). Chapter 10 of the ES (Document Reference 6.1) consider the effects on Crossness Conservation Area, associated listed buildings and Lesnes Abbey. A full setting assessment of Crossness Conservation Area and Lesnes Abbey, including views, has been undertaken in the ES (Chapter 10, Document Reference 6.1) and concludes effects to heritage assets are considered to be Not Significant. Visualisations for the TVIA chapter have been consulted and cross-referenced (see Chapter 9 of the ES, Document Reference 6.1).
	Historic Environment			In terms of table 7.5.2, it is noted 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	N	As per the comment above. A full setting assessment of Crossness Conservation Area and Lesnes Abbey has been undertaken in the ES (Chapter 10, Document Reference 6.1)

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				this assessment. If this is not the case they should be included.		and concludes effects to heritage assets are considered to be Not Significant. Crossness Conservation Area, associated listed buildings and Lesnes Abbey, their setting and views, are assessed within the ES. Visualisations for the TVIA chapter have been consulted and cross-referenced.
	Historic Environment			The potential effects on the setting of the conservation area should also 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.	N	The Applicant can confirm this has been included within the assessment and the Crossness Conservation Area Appraisal and Management Plan (Bexley Borough Council 2009) is included as a baseline source in Section 10.5 of the ES (Document Reference 6.1). Appendix F.1 of the ES (Document Reference 6.3) provides a full list of primary and secondary sources use in the assessment, provided in the bibliography of the DBA.
	Historic Environment			The methodology for assessing setting should reflect 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/). A stage approach should be adopted in the assessment of setting as outlined at paragraph 12 of the advice. This document should also be reflected at paragraph 7.5.31 of the scoping document.	N	Chapter 10 of the ES (Document Reference 6.1) has used ‘Historic Environment Good Practice Advice in Planning Note 3’ as guidance for the assessment. <i>The Setting of Heritage Assets</i> is included in Section 10.5.9 of the ES within a list of latest and comprehensive guidance used in the assessment. The five-stage assessment methodology is described in Section 10.10.3 of the ES. A full list of guidance documents use in this assessment is provided in the bibliography of the DBA (Appendix F.1 of the ES, Document Reference 6.3).

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	Historic Environment			Paragraph 7.6.1 indicates that a desk-based assessment and a geo-archaeological statement will form part of the Historic Environment Chapter. It is recommended that this text is amended to include reference to archaeological field surveys and evaluations should they prove necessary.	N	Section 10.5.11 and 10.5.12 of the ES (Document Reference 6.1) state that intrusive archaeological investigation may be required.
	Historic Environment			Section 7.6.7 lists sources to be consulted for the archaeological desk-based assessment report. This should be extended to include Local Studies Library and any other readily accessible evidence held elsewhere.	N	Prior to the publication of the PEIR, a draft archaeological desk based assessment was submitted to the archaeological advisor at LBB which incorporated all of the statutory consultation scoping responses. As outlined Section 10.5 of the ES (Document Reference 6.1) Local Studies Library have been consulted as part of the assessment. Appendix F.1 of the ES (Document Reference 6.3) provides a full list of guidance documents use in this assessment.
	Historic Environment			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.	N	Chapter 10 of the ES (Document Reference 6.1) includes attenuation tanks as a possible impact. Attenuation tanks have been included as a possible impact within the methodology statement of this ES.
	Historic Environment			Table 7.6.2 should also 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.	N	Table 10.3 in the ES (Document Reference 6.1) refers to the significance of heritage assets in relation to direct and indirect impacts and therefore supports the terminology of the NPPF.
	Terrestrial Biodiversity			Chapter 11 of the report concludes that the effects on biodiversity are not anticipated to be significant, following mitigation and compensation measures.	Y	Section 11.9.8 of the ES (Document Reference 6.1) states that bat surveys have been scoped out of baseline data and this has been agreed with the ecological advisor at LBB. In addition,

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				With reference to paragraph 11.5.8 and 11.5.9; the inclusion of bat surveys in the scope is recommended.		the outline Biodiversity& Landscape Mitigation Strategy (Document Reference 7.6) includes measures to avoid and reduce impacts to commuting and foraging bats. This approach was set out in the PEIR and has been agreed with LBB (email from LBB Planning Officer 26/09/2018).
	Terrestrial Biodiversity			It should be recognised that SINCs identified on page 21-24 in table 11.5, are of varying grades ranging from metropolitan, borough (grade I and grade II), and local importance for nature conservation.	N	SINCs have been valued within Chapter 11 of the ES (Document Reference 6.1) in accordance with their varying levels of ecological importance.
	Terrestrial Biodiversity			The Impact on aquatic biodiversity also needs to be considered. The site is adjacent to the River Thames. The River Thames and tidal estuaries are designated as a site of Metropolitan Importance for Nature Conservation (SINC) M031. This SINC also forms part of the River Thames strategic green wildlife corridor - No 11 - as adopted by LB Bexley within Bexley's SINC, 2016 document. The Thames, London's most famous natural feature, is home to many fish and birds, creating a wildlife corridor running right across the capital. The Thames is extremely important for fish, birds and bats.	N	Following changes to the design in March 2018, there will be no direct impacts to the River Thames or aquatic biodiversity. Therefore, the requirement for a full marine biodiversity assessment has been scoped out, and no fish surveys will be required to inform the EIA. This was set out in <i>REP: removal of river works and amend scope of EIA Technical Note</i> circulated to prescribed consultees on 23rd March 2018 (see Appendix C.28 of the Consultation Report, Document Reference 5.1) and agreed with LBB on 26 th September 2018.
	Terrestrial Biodiversity			The requirement for a fish survey should be considered within the scope. Natural England, London Wildlife Trust, Environment Agency and the Zoological Society of London should be consulted.	N	Following changes to the design in March 2018, there will be no direct impacts to the River Thames or aquatic biodiversity. Therefore, the requirement for a full marine biodiversity assessment has been scoped out, and no fish

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				Advice set out in the Zoological Society of London (ZSL) 'Conservation of Tidal Thames Fish through the Planning Process' guidance document should be considered.		surveys will be required to inform the EIA. This was set out in <i>REP: removal of river works and amend scope of EIA Technical Note</i> circulated to prescribed consultees on 23rd March 2018 (see Appendix C.28 of the Consultation Report, Document Reference 5.1) and agreed with LBB on 26 th September 2018.
	Terrestrial Biodiversity			Where opportunities to incorporate biodiversity improvements in and around the development exist, these will be encouraged by the London Borough of Bexley, especially where this can secure measurable net gains for biodiversity.		The scheme design has been informed by the ecological baseline and scale of ecological impacts, delivering a policy compliant scheme. A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. Opportunities for appropriate enhancement in and around the development.
	Terrestrial Biodiversity			The fragmentation of habitat through development, including roads is a key factor in the decline of certain species. This development could provide an opportunity to reduce habitat fragmentation. Where possible, wildlife crossing points should be designed into the scheme along the highway network; at locations near to existing wildlife corridors and nature conservation sites, such as the ditch network. These crossing points or eco-passages can be in the form of different types of underpass (tunnels and culverts). Incorporation of eco-passages into the road network at key locations can reduce the impacts of roads on the	N	The scope of construction work within the highway network involves excavation of a temporary trench approximately 0.45 m wide, laying of cables and backfilling, using temporary traffic management to control vehicle movements. Retrofitting of wildlife crossing points laterally across the highway network would involve design and consultation beyond the scope of current works proposed by the Applicant, and are considered unnecessary to mitigate the impacts of the proposed Development.

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				fragmentation of habitat. This is an essential part in the planning and design of developments to improve habitat connectivity, and supports the net biodiversity gain principle.		
	Terrestrial Biodiversity			It is understood that Natural England have been consulted separately on the PEIR and their comments will be crucial to the development of these proposals to ensure the protection and enhancement of designated sites, protected species and habitats.	N	The Applicant confirms that Natural England were consulted under section 42 of the PA 2008 about the Proposed Development. Natural England's response and the Applicant's response are summarised below in this table (Appendix J.3 of the Consultation Report, Document Reference 5.1). Consultation with Natural England was ongoing throughout the development of the Application.
	Hydrology, Flood Risk and Water Resources			<p>It is noted in Chapter 12 that the effects to hydrology, flood risk and water resources are not anticipated to be significant following mitigation. The nature of the Flood Risks will be addressed in a Flood Risk Assessment currently being prepared. The following issues should also be covered in the final assessments:</p> <ol style="list-style-type: none"> 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met; 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met; 	N	<p>The Flood Risk Assessment (Document Reference 5.2, Drainage Design Strategy (Document Reference 5.2) and an outline Code of Construction Practice (Document Reference 7.5) have been prepared accordingly.</p> <p>The Applicant can confirm that the issues numbered and listed to the left are covered in the following sections of the Application:</p> <ol style="list-style-type: none"> 1. Paragraphs 9.6-97 of the Flood Risk Assessment (Document Reference 5.2, Appendix G). 2. Section 7 of the Drainage Design Strategy (Document Reference 5.2) and Paragraphs 9.2-9.5 of the Flood Risk Assessment (Document Reference 5.2, Appendix G).

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				<p>3. The developments demand for water supply and network infrastructure both on and off site and can it be met;</p> <p>4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation;</p> <p>5. Any piling methodology and will it adversely affect neighbouring utility services.</p>		<p>3.. REP would be connected to the local water main network.</p> <p>4. Section 3 of the outline CoCP (Document Reference 7.5).</p> <p>5. Section 3 of the outline CoCP (Document Reference 7.5).</p>
	Ground Conditions			<p>An assessment of the likely effects on ground conditions from the construction, operation and decommissioning phases of the proposed development has been undertaken. The receptors identified within this assessment include human health, surface water, ground water, property and ecological system.</p> <p>It is understood that a preliminary site investigation is being undertaken to provide further information to inform the on-going assessment of the likely effects on ground conditions and there is a need for further intrusive investigation to further refine the preliminary conceptual site model, the details and findings of which should be presented within the final report along with any remediation that may be required.</p>	N	<p>The findings of the preliminary ground investigation and an Outline Remedial Strategy are presented in a Phase 2 Ground Condition Assessment (Appendix I.2 of the ES, Document Reference 6.3).</p>

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	Ground Conditions			It is understood that the Environment Agency have been consulted separately on the PEIR and their comments will be crucial to the development of these proposals to ensure that ground water is not negatively impacted.	N	The Applicant confirms that the Environment Agency have been consulted separately on the PEIR under section 42(1)(a) of the PA 2008. The Environment Agency's comments and the Applicant's Responses are summarised elsewhere in this table.
	Socio-economics			Details provided in the 'Chapter 14 Socio-economics' are considered appropriate.	N	The Applicant has noted this comment.
	Socio-economics			Please be aware that the Councils Learning and Enterprise College Bexley (LECB) offers employment and skills support to local residents and employers. LECB provides a holistic learning offer for the whole community including inter-generational learning for families; learning for work, skills and employment; personal development, health and wellbeing; and the active promotion of art and culture which brings together diverse communities helping to grow a thriving economy. The Council work closely with developers on construction projects with the aim of maximising apprenticeship and employment opportunities for our residents directly relating to the site and can advise on apprenticeship programmes, manage vacancies and employing local people. For business support including recruitment, training, apprenticeships you should contact:	N	The Applicant has noted this comment. Chapter 14 of the ES (Document Reference 6.1) includes an assessment of likely effects on the labour market and key economic sectors of relevance to the Proposed Development. As detailed in Section 14.12 of the ES (Document Reference 6.1), the Applicant is committed to generating local economic benefit from the Proposed Development and has a strong preference to recruit locally where possible.

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				http://www.thelearningcentreboxley.ac.uk/index.html .		
	In-Combination and Cumulative Effects			The PEIR has summarised that there will be potential for in-combination effects to human, heritage, biodiversity, water body and community infrastructure receptors. Further assessment of these effects will be presented in the Environmental Statement.	N	In-combination effects are presented within Chapter 16 of the ES (Document Reference 6.1),
	EIA Methodology			A “long list” of other developments which will be taken into consideration for the assessment of cumulative effects has been provided. However, the rationale for how these developments were scoped out is not apparent. It is noted that the list will be refined and agreed for assessment within the Environmental Statement that will accompany the formal DCO application. The Council would like the opportunity to comment on the final list of applications within LB Bexley, which should include any planned developments which are likely to come forward, prior to assessments being undertaken.	Y	The Applicant provided a list of committed developments to be considered within the cumulative effects assessment in the EIA to LBB on 29 th August 2018, with an explanatory note of the methodology used for cumulative assessment. LBB responded and requested an additional 8 committed developments to be considered. These have been incorporated into the assessment.
Royal Borough of Greenwich	Transport	13.06.18	30.07.18	On the basis that the existing RRRF operates with approximately 75% of the waste to be processed arriving by River (with 25% by road) a similar amount is expected by the REP. It is recommended that unless this can be controlled to occur in practice that alternative scenarios are tested i.e. 50% by road and river. While no indication is	N	The Applicant has a long history as a river based logistics company and has a commercial imperative to bring in waste by river. However, the operational scenario tested within Chapter 6 of the ES (Document Reference 6.1) and TA (Appendix B.1 of the ES, Document Reference 6.3) assumes ‘100% by road’ of waste on a reasonable worst case basis.

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				given of the amount of construction materials to be transported by River opportunities should be taken to maximise its use. Also given the origins of construction suppliers is unknown while 50% of road traffic is assumed to be from the east and 50% from the west, further scenarios should be tested with 60/40% splits.		<p>Additionally, a '100% by river' scenario is assessed in the NRA (see Appendix B.2 of the ES, Document Reference 6.3).</p> <p>Opportunities to move materials by river during construction will be explored. The assessment of construction travel impacts is presented as a reasonable worst case scenario – with the construction period at the anticipated peak period of Month 13. The assessment of construction traffic has assumed a 50% east / 50% west distribution. During the construction peak (Month 13) it is predicted that there would be in the order of 22 goods vehicle visits per day (44 movements). Alternative distribution scenarios (e.g. 60/40% split) would not materially affect the resultant network impacts. During construction a proportion of materials would potentially be transported by river.</p>
	Townscape and Visual Impact			The location of the proposed REP is within the local view no. 4 Eaglesfield Recreation Ground towards Bexley and the Lower Thames in the Council's Core Strategy. The Townscape and Visual Impact Assessment chapter of the EIA should include justification for its omission from the assessment.	N	The TVIA at Chapter 9 of the ES (Document Reference 6.1) includes local view no 4 Eaglesfield Recreation Ground (see Viewpoint 16).
	Townscape and Visual Impact			Other notable developments which may warrant inclusion in the cumulative assessment include: <ul style="list-style-type: none"> Woolwich Polytechnic School for Girls Ref: 17/3907/F which was approved 01/05/18 and is currently under construction. 	N	The Applicant provided a list of committed developments to be considered within the cumulative effects assessment in the EIA to RBG on 29 th August 2018, with an explanatory note of the methodology used for cumulative assessment. RBG were satisfied with the approach.

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				<ul style="list-style-type: none"> The Reach, Thames Reach/Battery Road Ref: 16/2163/F which was approved 09/05/17 and is currently under construction. <p>The Council has also published its draft site allocations document which also includes the Council's Housing Zones in Thamesmead. The document is available on the Council's website using the following link: http://www.royalgreenwich.gov.uk/downloads/download/747/site_allocations_documents</p>		<p>The Cumulative Assessment considers these developments, see IDs 371 and 372 in Appendix A.4 of the ES (Document Reference 6.3). These schemes failed to meet the TVIA threshold criteria outlined in Chapter 4 of the ES (Document Reference 6.1) for likely significant effect and thus are not assessed cumulatively within Chapter 9 of the ES.</p> <p>The draft site allocations document has been considered as ID 373 within Appendix A.4. High level consideration has been given to this within Chapter 9, however it was considered that there was no potential for likely significant cumulative effects from the allocations listed within the document and therefore those allocations have not been assessed specifically in Section 9.10.</p>
	Energy Generation			<p>As part of the application, RBG would like the following to be taken into consideration:</p> <ul style="list-style-type: none"> An analysis of the site's potential energy supply and demand. <p>The proposed development does not make use of waste heat from the nearby sewage works, the possibility of this should be examined.</p>	N	<p>A CHP Study (Document Reference 5.4) has been submitted with the REP DCO application, which assesses the feasibility of the site's potential energy supply and demand..</p> <p>REP will be a generator and net exporter of heat and thus will not require additional heat from the nearby sewage treatment works.</p>
Gravesham Borough Council	Other	13.06.18	30.07.18	<p>Having read through the Preliminary Environmental Impact Assessment (PEIR) report, it does not appear that the proposal will have a direct significant impact on our borough.</p>	N	<p>The Applicant can confirm no likely significant residual effects are anticipated on the area within Gravesham Borough.</p>
	Transport			<p>However, there are potential indirect impacts in that the installation of the</p>	N	<p>The Applicant has noted this comment. Dartford Borough Council's, Kent County Council's and</p>

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				electrical connection to Littlebrook may cause disruption to traffic along the A206 and in the vicinity of the M25 junction 1A (Dartford Crossing). It is understood that this issue has already been raised by Dartford Borough Council, Kent County Council, and Highways England and that this is being addressed. On this basis, Gravesham would not wish to make further comment in this respect, as any issues arising will be dealt with by those parties.		Highways England's comments on the PEIR and the Applicant's responses are summarised in this table (Appendix J.3 of the Consultation Report, Document Reference 5.1). Ongoing consultation relating to highways has occurred with KCC, DBC and Highways England throughout the development of the application.
	Transport - Use of the River			Whilst this authority fully supports the use of the River Thames for the transportation of both passengers and materials subject to a consideration of impacts, it would be useful if the EIA that accompanies the actual application could set out what the implications are in terms of use of the river associated with the Riverside Energy Park (i.e. types of vessel/number of trips/impact relative to alternatives etc) so that this can be fully understood.	N	A Navigational Risk Assessment (NRA) has been carried out for the Application and is appended to the ES (Document Reference 6.3, Appendix B.2 and summarised at Section 6.9). This considers issues regarding the level of service, types and number of vessel movements and level of safety for vessels on the River Thames.
	Transport			As part of this, it is noted that Cory's incinerator bottom ash (IBA) from its existing incinerator is already being taken to an incinerator bottom ash processing facility at the Port of Tilbury (PoTLL) in Essex, and it is intended that waste arising from the operation of the Cory Riverside Energy Centre will also be transported by river for processing at Tilbury Docks. We assume that the processing of this additional material	N	An Operational Waste Statement is included as part of the ES (Chapter 15 Document Reference 6.1). This explains how and where materials arising from REP will be managed. The Applicant can confirm that there is sufficient capacity at the existing IBA processing facility at the Port of Tilbury to manage the material expected from REP.

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				from the Riverside Energy Centre would not exceed the capacity limit set for that facility at the PoTLL. If this isn't the situation, we assume that this would need to be considered within the EIA for the Riverside Energy Centre project.		
	Transport			It is also noted that Cory has acquired Denton Slipways in Gravesend, as a facility for the servicing and repair of its vessels, which is to be welcomed given it may lead to investment that could secure the future of river-related use on this site. We understand, from previous correspondence, that you consider that the shipyard does not form part of this application for a Development Consent Order as it is a working yard which has been operating for many years.	N	The Applicant acknowledges this comment and confirms that Denton Slipways in Gravesend is not part of the REP DCO application.
	Marine Environment			Gravesham would also point out that there is a proposal for a Marine Conservation Zone (MCZ) to be designated at St Clement's Reach, Swanscombe through which barges etc. would need to pass to reach Tilbury Docks. Whilst this is unlikely to raise any issues, it should presumably be included in the EIA so that the baseline is up to date.	N	The Applicant notes this comment. Temporary construction and dredging works within the marine environment, which were included in the Scoping Report, are no longer included as part of the Proposed Development. Therefore, an assessment of the proposed Marine Conservation Zone has now been scoped out of the assessments As currently occurs, material being transported by river to Tilbury will be transported on barges in sealed containers.

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Kent County Council	Transport	13.06.18	30.07.18	KCC, as the Local Highway Authority, is concerned about the impacts during the construction and operational phases of the proposed REP on the A206 Bob Dunn Way and junction 1A of the M25.	N	The Applicant notes this comment, please see specific comments below
	Transport			The PEIR shows that the proposed REP would impact the A206 Bob Dunn Way and M25 Junction 1A during the operational phase. The Electrical Connection Route (ECR) is also proposed to be routed along the A206 Bob Dunn Way. This part of Kent's local road network suffers with congestion at peak times, particularly during the AM peak hour between 07:00-09:00 and the PM peak hour of 17:00-18:00. The A206 Bob Dunn Way is also particularly vulnerable to the impact of incidents on the M25/A282 mainline approach to the Dartford Crossing. Such incidents cause traffic to find alternative routes across the Dartford road network, including through the town centre to Junction 1B. Therefore, the routing of HGVs, resulting in any increase in HGV movements associated with the proposal, will need to be carefully considered.	N	<p>The Applicant agreed with KCC and DBC that impacts from possible re-routeing of vehicles during incidents elsewhere on the network would be covered qualitatively in the transport Assessment (Document Reference 6.3, Appendix B.1). The amount of traffic generated by the operation of REP at the M25/A282 is significantly less than the daily variation of flow on that network and therefore there would be no perceptible impact and would not cause the reassignment of other vehicles. Tables 6.4 and 6 indicate that the volume of traffic movements on A206, close to Junction 1a (as measured by ATC16 – Bob Dunn Way) would be readily within the daily variation of peak hour traffic – which was observed to vary more than + or - 10% of the average morning peak hour flow.</p> <p>By its nature an “incident” on the strategic network is unplanned and unquantified and so there are a near infinite number of resultant impacts.</p> <p>It is the Applicant's view that temporary disruption to the network is not a matter that can reasonably be assessed, given that this affects the entire traffic flow at any random point of disruption, regardless of origin and destination. Without prejudice to this assertion, a qualitative consideration is included in this Chapter 6 of the ES (Document Reference 6.1) and the TA</p>

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						(Appendix B.1 of the ES, Document Reference 6.3) as requested.
	Transport			KCC supports the proposal to utilise the River Thames to transport material, since this has the potential to significantly reduce the volume of additional HGVs on the road network.	N	The Applicant acknowledges this response.
	Transport			There are a number of assumptions which underpin the predicted trip generation rates as referenced within the PEIR (para 6.4.10, p 20). Further detail and explanation is required in order to confirm the predicted increase in vehicle movements, particularly HGV movements.	Y	Section 6.4 of the ES (Document Reference 6.1) and the Transport Assessment (Document Reference 6.3, Appendix B.1) provide additional detail on the assumptions which underpin the predicted trip generation rates. The volume of Heavy Good Vehicles (HGV) traffic generated by the construction and operation of REP has been determined by comparison with RRRF.
	Transport			During construction, the PEIR assumes that 50% of construction material transported by road is via the M2; however, it is not known how this figure is derived.	N	This assumption has been made in the absence of more specific information being currently available on vehicle routeing of materials. The assumption reflects the location of REP in relation to London and the south east. The balance of flow would vary depending on the contractor and their suppliers, which cannot be determined at this stage of design. Flows will also vary depending on the tasks and programme – with the concentration being on mass materials during the early works and site preparation, to more specialist materials during the later fit out and commissioning. Where practicable the contractors will seek to source material and plant from suppliers close to REP. The peak movements for non-worker construction traffic is predicted to be in the order of 22 vehicle visits per day and so variations in

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						distribution of those movements would be unlikely to materially affect the outcome of the assessment.
	Transport			The PEIR refers to the “applicant’s previous experience” of a Energy Recovery Facility and “the location of the existing WTS sites” which will affect the vehicle distribution (para 6.4.19, p 23). It also sets out the vehicle distribution of the Anaerobic Digestion facility (para 6.4.25, p 24). KCC requests that further details are provided as to how the assumption of a 70% Bexley - 30% Central London and South East split has been adopted for the green/food waste input transported by road.	N	This assumption is that food waste is anticipated to be transported from the more local boroughs. The actual origin of the food waste stream cannot be determined at this stage as this would depend on the waste market. Future contracts might have their source in other boroughs. The Anaerobic Digestion facility could be used to provide for LBBs needs. LBB are keen to have an ‘in borough’ solution for its food and green waste which currently is exported out of borough.
	Transport			Further details are sought on the reasonable worst case scenario for vehicle trips by road, particularly on the 35% Tilbury - 65% Central London split for waste arriving at REP.	N	These assumptions are established from comparison with the operations at RRRF as a base assumption. Section 6.4 of the ES (Document Reference 6.1) outlines the parameters used for the Transport Assessment.
	Transport			In addition, KCC requests further details as to how the annual throughput of 805,000 tonnes for the Energy Recovery Facility and 40,000 tonnes for the Anaerobic Digestion Facility is derived.	N	The throughput for REP has been prescribed by the Applicant on the basis of the maximum scale of development and processing technology that could be accommodated with the space available at REP.
	Transport			The PEIR refers to PBA Technical Note 3 which it states provides further information on how lorry movements have been calculated. KCC requests a copy of this Technical Note.	Y	The Applicant issued Technical Note 3 to Kent County Council, London Borough of Bexley, Highways England and Dartford Borough Council on 2 nd May 2018 which provided further details on the information used within the impact calculations. The information and assumptions presented in this Technical Note have been

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				Reference to the Personal Injury Collision (PIC) review (paragraph 6.6.10, p 36) will need to include the KCC network of A206 University Way/Bob Dunn Way and A282 Junction 1A, for the past three years.		used to inform Chapter 6 of the ES (Document Reference 6.1) and the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). The Personal Injury Collision (PIC) review is included within the TA and summarised in this Chapter. The review includes A206 Bob Dunn Way. The low percentage impact at A282/M25 junction 1A, derived by the operation of REP, would not materially affect the pattern of collisions in that location. The assessment of impact is reported at Section 6.4 of the ES.
	Transport			The Traffic Management Plan (TMP) needs to be carefully considered and will be used by KCC to understand the trips associated with the proposals on Kent's road network. It would be beneficial if the collection/disposal locations are made available in order to consider the routing of vehicles. Further details on the route plans proposed (para 6.10.6, p 45) should be provided. A strategy of how the site operator can deal with incidents on the network to alter HGV movements would be appropriate to mitigate the impact of the development and would need to be included in the TMP.	Y	The proposed trip distribution is derived on the basis of existing flows to RRRF and on observed traffic data. The balance of distribution for REP could vary depending on the contract at the time. The TA (Appendix B.1 of the ES, Document Reference 6.3) and outline CTMP (Appendix B.1 of the ES, Document Reference 6.3), indicates the routeing for goods vehicles and complementary measures to guide and control access during construction. Vehicle routeing during the operational phase would reflect the contracts at that time – with movements concentrated on the local and strategic road network. Section 6.12 of the ES (Document Reference 6.1) considers the implications of incidents on the network.
	Transport			The County Council's Streetworks Team will need to be involved in the co-ordination of the proposed roadworks within Kent. It is not known how long the	Y	The Applicant met the KCC Streetworks Team on 5 th July 2018, in a joint meeting with Dartford Borough Council, to discuss the streetworks process and its relationship to the DCO. It was

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				<p>construction phase is for the cable route on the A206 Bob Dunn Way and careful management will be necessary to ensure minimal impacts on the sensitive network. Detailed construction details will be required to minimise disruption on Kent's road network.</p>		<p>agreed that the Streetworks Team should be consulted via the KCC planning team and that UK Power Network's contractor would continue to liaise directly with the KCC highway engineering team to inform their consideration of electrical connection route options. It was noted by all present that the KCC Streetworks Team would have the opportunity to comment on any of the Applicant's proposed amendments to the Streetworks process in their draft DCO following acceptance of the application.</p> <p>Detailed phasing of the delivery of the Electrical Connection would be confirmed and agreed with the Streetworks Team through a CTMP covering those works. Requirement 13 of the draft DCO requires a Construction Traffic Management Plan (CTMP) (Document Reference B.1) to be submitted for approval before the commencement of works, and secures its implementation.</p> <p>Further details are provided in the TA (Appendix B.1 of the ES, Document Reference 6.3) and the phasing of the delivery of the Electrical Connection would be agreed through the CTMP (secured through DCO Requirement 13).</p>
	Transport			<p>With regard to the options for the cable route, Option 2A would reduce the impact on the highway network for the construction and any future maintenance of the associated infrastructure. However, it would result in a greater impact on The Bridge</p>	N	<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-</p>

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				<p>development and it is not known how this would impact Fastrack bus services and other local roads. KCC supports a route for the electrical connection that avoids the constraint of the Cray Mill Bridge, as this would minimise the disruption during construction to the approach of the A206 Bob Dunn Way/Burnham Road roundabout.</p>		<p>ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>The TA (Appendix B.1 of the ES, Document Reference 6.3) includes a qualitative review of each route for appraisal of the Transport implication taken in the round with other aspects.</p> <p>All current options for the Electrical Connection Route cross the 'Cray Mill Bridge' on the A206. Suitable temporary traffic management would be agreed with LBB and KCC – where this is expected to extend into KCC's administrative area.</p> <p>No likely residual significant effects were identified.</p> <p>Assessment of effects to the Fastrack bus service is undertaken in Section 6.9 of the ES (Document Reference 6.3).</p> <p>Appropriate notifications would be made through the Local Highway Authorities' (LHA) systems or modified process secured through the DCO (see article 16 (traffic regulation) which requires the</p>

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						traffic regulation powers to be exercised with the consent of the traffic authority).
	Transport			To conclude, KCC requests that the further details are provided to enable the Local Highway Authority to fully assess the report's conclusion that there would be a negligible effect on all receptors during the operational phase.	N	The Applicant notes this comment. Chapter 6 of the ES (Document Reference 6.1) sets out the assessments that have been undertaken in relation to transport. This includes a full Transport Assessment (Document Reference 6.3, Appendix B.1).
	Transport - Public Rights of Way			The proposed REP is unlikely to have a significant impact on Kent's PRow network, as the main site is located in the neighbouring London Borough of Bexley. However, ECR option 1 and option 2B both pass through Kent and are likely to affect PRow's DB1, DB2, DB3 DB5, DB8, DB50 and DB56	Y	<p>The construction of the Electrical Connection is anticipated to have negligible impact on the PRow network. A number of PRow's about the route but only two cross it, as shown on the Access and Rights of Way Plans (Document Reference 2.3).</p> <p>The proposed works compound accessed from A206 would interact with DB5. The route of DB5 would be managed within the layout for the compound and its route under the A206 should be maintained.</p> <p>If Electrical Connection route option 1A across Crossness Nature Reserve is implemented, a temporary closure of FP2 is anticipated, with suitable diversion using Norman Road and FP4. Depending on the final alignment FP1 could also be temporarily closed or the terminal point diverted.</p> <p>Where the detailed design of the route and the schedule of works show direct impacts on other PRow's (such as DB1 and DB3) these would be provided for in the temporary traffic management measures – either through</p>

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						protected corridors or suitable short term diversions. The protective measures and mitigation would be agreed with the LHA and LPA as part of the CTMP (Document Reference B.1). Requirement 13 of the draft DCO requires a Construction Traffic Management Plan (CTMP) to be submitted for approval before the commencement of works, and secures its implementation.
	Public Rights of Way			KCC welcomes the PEIR highlighting the existence of the PRoW network, acknowledging previous PRoW comments and considering potential impacts on PRoW during the construction, operation and decommissioning phases of the REP. The potential impacts of the project on the PRoW network and its users must be considered, as the paths provide significant opportunities for outdoor recreation and active travel across the region.	N	The Applicant has noted this comment. Chapter 6 of the ES (Document Reference 6.1) considers the impacts on the Public Rights of Way (PRoW) network and its users. There will be no permanent closures or diversions of PRoW for the main REP site or the Electrical Connection.
	Public Rights of Way			The PEIR states there will be no permanent PRoW closures or diversions (Transport Chapter 6, p 10). This is welcomed by KCC, as path extinguishment proposals can potentially fragment the PRoW network and are likely to receive objections from the public.	N	The Applicant has noted this comment. Chapter 6 of the ES (Document Reference 6.1) considers the impacts on the Public Rights of Way (PRoW) network and its users. There will be no permanent closures or diversions of PRoW for the main REP site or the Electrical Connection. Temporary closures or diversions are discussed below.

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	Transport - Public Rights of Way			<p>The PEIR states that the final ECR would “either cross or be adjacent to a number of PRow” (para 6.6.21, p 37). Whilst it is anticipated that the connection will be underground and not require regular maintenance (Para 6.8.31,p 44), there is still a possibility that the connection may develop a fault in the future and need repairing. With this in mind, it is requested that the ECR is not positioned along the definitive alignment of a PRow. This would prevent long term disruption for path users, as the surface of the PRow would not need to be disturbed in order to access the ECR and complete repair works.</p>	N	<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>As with the construction phases for the Electrical Connection any interaction with PRows would be subject to appropriate traffic management measures associated with a particular fault.</p> <p>UKPN, who would implement the electrical connection route on behalf of the Applicant, have confirmed that the entire route underground would be ducted. This would mean that, in the unlikely event of a fault, the cable could be accessed (and replaced if necessary) from access covers spaced along the route, without the need to disturb the ground above.</p> <p>Appropriate temporary routeing or diversions for PRows over short distances around access covers would seek to avoid interactions with the</p>

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						<p>PRoW network during maintenance operations where practicable.</p> <p>Given the length of the Electrical Connection, its ducted nature, and the likely limited interaction of access covers with PRoW, the likelihood of a fault occurring which would impact a PRoW is considered very unlikely.</p> <p>In such an event, future works of maintenance related to the operation of the Electrical Connection would be regulated under the provisions of the New Roads and Streets Works Act 1991, in the normal way.</p>
	Transport-Public Rights of Way			<p>It is understood that detailed temporary closure requirements are not known at this stage, but they are likely to be requested for the construction phase. Temporary closures should be avoided as they cause disruption for path users but, if they are necessary, the duration of a closure should be kept to a minimum. Where temporary closures are necessary, convenient diversion routes should be provided for the public to reduce disruption for path users. It is therefore encouraging to note in the PEIR that alternative diversion routes would be provided for the duration of temporary path closures.</p>	N	<p>The Applicant has noted this response, however, PRoWs are not anticipated to require full closure (as they are generally only expected to require localised diversions where the footpath crosses the working area) during construction of the Electrical Connection. However, Electrical Connection route option 1A could be implemented across the Crossness Nature Reserve. In that instance footpath FP2 could require a longer distance temporary closure with a suitable diversion along Norman Road and FP4. FP1 could be affected – subject to detailed design arrangements. Details of the temporary management of PRoWs (including short local diversions and closures) would be set out in the Construction Traffic management Plan for that stage and secured through a Requirement of the DCO. An outline Construction Traffic Management Plan (CTMP) has been submitted as part of the ES (Document Reference B.1)</p>

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	Transport-Public Rights of Way			On completion of the construction work, the surface of the PRoW will need to be restored to its original condition (or better) before the path is reopened to the public. The cost of such restoration is to be met by the applicant.	N	Construction details for the route of the Electrical Connection would be provided as part of the Code of Construction Practice (CoCP) for that stage and secured through a Requirement of the DCO. These would reflect the existing surface treatment. An outline CoCP has been submitted as part of the ES (Document Reference 7.5).
	Transport - Public Rights of Way			The applicant is also reminded that they will need to apply for a Temporary Traffic Regulation Order (TTRO) before they can close a PRoW. Please note that a TTRO application would take a minimum six weeks to process, as the closure notices must be advertised to the public in advance. KCC's PRoW and Access Service would welcome future engagement with the applicant to discuss this process.	N	Article 12 of the draft DCO provides for the temporary closure or diversion of streets. In the case of the streets identified in Schedule 5, this power can only be exercised in consultation with the street authority (being the body with ownership of the street) and, in respect of other streets, with the consent of the street authority.
	Public Rights of Way			This proposal is unlikely to have a significant impact on the PRoW network in Kent as the principal REP is located in neighbouring London Boroughs. However, the proposed ECR would pass through Kent and potentially impact the PRoW network. KCC's PRoW and Access service would welcome future engagement with the applicant to discuss the potential impacts and consider appropriate mitigation to ensure that path users are not adversely affected by the development.		The utility contractor would engage with the Local Highway Authority responsible for the PRoW – LBB or KCC. They will be guided by the assigned officer as to the method of engagement with the PRoW officers in that area.

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	Historic Environment			Only part of the REP scheme is within the Dartford area of Kent and this is largely focussed on the current road network and the connection to the Littlebrook Substation site (ECR Option 2B). KCC has reviewed the Non-Technical Summary and accompanying baseline assessment of the historic environment which includes a full Desk-Based Assessment (DBA) and a Geo-archaeological and Palaeoenvironmental Assessment.	Y	Prior to the publication of the PEIR the draft DBA was submitted to the archaeological advisor to KCC. The scope of the assessment was agreed. The DBA has been updated to include a more detailed impact assessment and reflect slight changes to the Proposed Development. The updated assessment has been approved by KCC.
	Historic Environment			The DBA by Orion is detailed and clearly sets out the baseline details of the heritage assets and potential heritage assets which may be impacted by the scheme. Within the Kent section, this includes Romano-British activity sites, Anglo Saxon burial site and Medieval or later settlement and land boundaries. There is still potential for unknown archaeological remains to survive along the route. KCC accepts the DBA and has no further comments to make.	N	Chapter 10 of the ES (Document Reference 6.1) and DBA (Appendix F.1 of the ES, Document Reference 6.3) has identified areas of the Electrical Connection route options where further archaeological investigations may be required see Section 10.9.18. Substantial groundworks (i.e. Horizontal Directional Drilling, junction pits or 10m+ sections of cable trench) will trigger the need for further archaeological work. The scope of the further works will be developed with the Archaeological Advisors to Kent County Council and Historic England, and approved by the relevant planning authority under requirement 7 of the draft DCO, once the location and design of the cable trench is fixed. The updated DBA has been submitted and to the archaeological advisor to KCC and Historic England.
	Historic Environment			The Geo-archaeological and Palaeoenvironmental Assessment by Quest seems to provide a broad assessment of the wider area, but only	N	The Applicant considers that the assessment of the Historic Environment in Chapter 10 of the

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				detailed comments on the London side of the scheme. There is limited assessment of the geoarchaeological potential of the scheme where it extends through the Kent side to the Littlebrook Substation, although it is acknowledged that there are potentially significant deposits, including palaeo-land surfaces at depth. KCC considers that this assessment is acceptable, but only on the basis of the current data provided on proposed groundworks within the Kent section.		Environmental Statement (Document Reference 6.1) to be robust. Requirement 7 of the draft DCO requires the approval of the relevant planning authority of a written scheme of investigation (WSI) before the commencement of the relevant works. The WSI must identify any area where further archaeological investigations are required and provide details of the measures to be taken to record or preserve significant features.
	Historic Environment			The Written Scheme of Investigation (WSI) refers only to a scheme of geoarchaeological work for the London extent of the scheme and it appears to be assumed that because the impact of the scheme will be so shallow within the Kent section, there is no need to address any further geoarchaeological issues. This is acceptable on the basis that the depth of disturbance within the Kent section will not be deeper than 0.9m. Any groundworks which may extend to a depth below 0.9m will need to be informed by suitable geoarchaeological assessment and Palaeolithic assessment.	N	The change in depth of the cable trench has been discussed with the Archaeological Advisor to Kent County Council and the above triggers for archaeological works have been agreed. Should the depths of disturbance exceed 0.9m the need for further geoarchaeological investigations will be established, and if necessary implemented, through the WSI under requirement 7 discussed above.
	Historic Environment			The assessment of the historic environment for this scheme is acceptable based on current information. However, should details of groundworks for this scheme change,	N	The change in depth of the cable trench has been discussed with the Archaeological Advisor to Kent County Council and the above triggers for archaeological works have been agreed.

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				there may be a need to review the baseline assessment for the Kent section of the scheme.		
	Historic Environment			With regard to heritage mitigation for the Kent section, on the understanding that the groundworks for the ECR is within the existing road network and extends to a maximum depth of 0.9m, mitigation for heritage can be addressed through a formal programme of archaeological work. In view of the potential for Romano-British activity, an Anglo-Saxon burial site, a medieval settlement and historic landscape features, KCC recommends that a watching brief is not sufficient.	Y	Section 10.11 of the ES (Document Reference 6.1) considers further mitigation and enhancement measures to prevent any potential adverse impacts on heritage assets. This section sets out recommendations for further archaeological investigations, if required, as opposed to a watching brief. If required, a Written Scheme of Investigation (WSI) will be submitted to and approved by the relevant planning authority under requirement 7 of the draft DCO. In line with comments from KCC the recommendation of the ES is for further archaeological works rather than a watching brief, secured as requirement 7 of the draft DCO.
	Historic Environment			Therefore, KCC recommends that the Kent section of this scheme would be more appropriately covered by a formal programme of archaeological works which includes some advanced and targeted test pitting, followed by a programme of formal archaeological monitoring of varied intensity. This formal programme of archaeological work should be in accordance with a specification agreed with the Kent County Archaeologist. KCC considers that the DCO could	N	As noted above, the Applicant has included a suitably worded requirement, number 7, in the draft DCO.

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				<p>include a requirement along the lines of the following:</p> <ul style="list-style-type: none"> AR1. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority. <p>Reason: To ensure that features of archaeological interest are properly examined and recorded in accordance with NPPF.</p>		
	Terrestrial Biodiversity			<p>Having reviewed the submitted information, it appears that within Kent all the works will be largely restricted to the ECRs, which will be located within the existing roads and hard standing.</p> <p>The PEIR concludes that there will be no significant adverse effect resulting from the section of the ECR located within Kent and where impacts will occur a precautionary mitigation will be implemented, and the habitats reinstated.</p> <p>There will be a need for a method statement to be produced and implemented and it will need to set out the precautionary ecological mitigation</p>	Y	<p>The outline Biodiversity and Landscape Mitigation Strategy (Document Reference 7.6) sets out all ecological mitigation measures, habitat re-creation and biodiversity offsetting. The draft DCO (Document Reference 3.1) includes a requirement to secure a final Biodiversity Mitigation Strategy which will be substantially in accordance with the outline Biodiversity & Landscape Mitigation Strategy (Document Reference 7.6).</p>

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				and the proposed habitat re-creation works.		
	Hydrology, Flood Risk and Water Resources			<p>The PEIR is comprehensive and covers issues relating to flood risk. The report recognises there are areas of surface water flood risk within the boundary for development but that these areas at risk are located outside of KCC's boundary.</p> <p>KCC also recognises that the report states appropriate measures are proposed to manage surface water during the construction stage. KCC supports the proposal to monitor and manage ground and surface water quality to mitigate or prevent contamination of water.</p>	Y	<p>The Applicant has noted this response. An Outline Drainage Design Strategy, included in the Flood Risk Assessment (FRA) (Document Reference 5.2) and an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) detailing appropriate mitigation measures during the construction and operation of the Proposed Development have been included alongside the REP DCO application.</p> <p>Requirement 11 of the draft DCO secures the finalisation of the code of construction practice subject to the approval of the relevant planning authority before the commencement of works, and secures subsequent compliance.</p>
	Waste Management			<p>The Kent Minerals and Waste Local Plan 2013-30 (KMWLP) takes a positive approach in favour of sustainable development, as contained in the National Planning Policy Framework (NPPF), the National Planning Policy for Waste and the associated Planning Practice Guidance. This includes specific sustainable waste management objectives (Policy CSW 1: Sustainable Development) and the strategy for waste management in Kent, to provide sufficient capacity to manage at least the equivalent of the waste arising in Kent and some residual non-hazardous waste from London (Policy CSW 4:</p>	N	<p>The Planning Statement (Document Reference 7.1) explains how the Proposed Development is compliant with local planning policy and guidance.</p>

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				<p>Strategy for Waste Management Capacity). The REP facility would make a positive contribution by ensuring that London’s waste is significantly managed within London, enabling Kent’s waste management capacity to address Kent’s needs to help achieve the net self-sufficiency objective over the plan period. Furthermore, the proposal is entirely in line with similar objectives of the London Plan to essentially attain net self-sufficiency in waste management (Policy 5.16: Waste net self-sufficiency of the London Plan (Greater London Authority, 2016) and emerging Policy S18: waste capacity and net waste self-sufficiency of the Draft New London Plan).</p>		
	Waste Management			<p>It also understood that materials, having been source segregated and transferred from transfer stations to the REP facility, would be used for energy recovery including combined heat and power, off peak battery facility charging and organic waste and anaerobic treatment. This represents other activities at the recovery and recycling parts of the defined waste hierarchy as detailed in the National Planning Policy for Waste. KCC regards this as an appropriate way to manage London’s waste arisings, provided the non-organic residual wastes from commercial, industrial and local authority collected waste streams are incapable of further reuse or</p>	N	<p>The Applicant has noted this comment and welcomes this response.</p>

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				<p>recycling and fall into the recovery level of the hierarchy. 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 are supported by the County Council, as Minerals and Waste Planning Authority.</p>		
	Ground Conditions			<p>It should be noted that the ECR (Option 2B) to the Littlebrook Substation passes through the safeguarded minerals deposits of Sub-Alluvial River Terrace Deposits and River Terrace Deposits, as shown on the KMWLP proposals maps 'Kent Minerals and Waste Local Plan Dartford Borough, Gravesham Borough and Tonbridge and Malling Borough – Minerals Safeguard Areas'. There is, therefore, some potential for sterilisation of safeguarded mineral deposits and the PEIR does not include a minerals assessment to address the safeguarding issue and demonstrate compliance with Policy DM 7: Safeguarding Mineral Resources of the KMWLP. This policy has criteria that may be appropriate to justify an exemption from the KMWLP's presumption to safeguard important mineral resources.</p>	Y	<p>A Minerals Assessment addressing the safeguarding of mineral deposits in the Application Boundary is provided in Appendix 13.C of the Planning Statement (Document Reference 7.1). The Minerals Assessment supports KCC's Policy DM7. This approach has been agreed with KCC's Minerals and Waste Planner.</p> <p>The Assessment concluded that it is not practicable or viable to extract the underlying mineral prior to ECR being laid. However, anything raised incidental to construction of the ECR would be used where possible.</p>

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	Socio-economics			Any impact on KCC Service provision would mainly come from the jobs created both during the construction and operational periods of the development. In this respect, the estimated number of jobs generated is relatively low at 140FTE during the construction period and 75FTE during the operational period. The labour markets across the local area, wider area and wider region are likely to absorb these jobs.	N	An assessment of likely employment generation and labour market effects from the construction and operational phases of the Proposed Development is provided in Sections 14.9 – 14.13 of the ES (Document Reference 6.1). This includes a Cumulative Assessment presented in Section 14.10 of the ES (Document Reference 6.1) which examines the ability of the labour market to absorb the predicted employment from the Proposed Development and the influence of relevant cumulative developments. No significant cumulative effects are predicted to arise as a result of the Proposed Development.
	Socio-economics			Even if the whole of the labour force was to move into the area, the impact on community facilities outside the local area would be minimal. In the case of construction workers, this is unlikely as the jobs created would be temporary (three years at most).	N	The EIA Scoping Opinion received from the Planning Inspectorate specifically requested the assessment of labour market effects be supported by an assessment of associated effects on community infrastructure. Sections 14.9-14.13 of the ES (Document Reference 6.1) provide a proportionate assessment of such effects. For the construction phase, effects to the labour market and local accommodation providers are considered to be beneficial and Significant. Effects to community infrastructure and key business sectors are considered to be Not Significant.
	Socio-economics			KCC has some reservations regarding the GVA figures, principally on the basis of the average GVA values used per head. KCC questions the Greater London GVA of £111,444 for each construction job as being applicable to this area on the outer edge of Greater London. Similarly, the GVA of £184,014	N	GVA per worker figures used in the PEIR were generated from bespoke forecasts supplied by Experian (2017) for the drive-time Study Areas adopted in the assessment. These forecast GVA generation and employment per sector over the expected construction and operational phases of the Proposed Development. By way of comparison, an analysis of current (2016) GVA

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				for each operational job also seems questionable, both for being for Greater London and for utility workers.		per worker using publicly available data indicates average GVA per construction worker in London is approximately £112,000 and average GVA per operational worker (in the relevant waste treatment sector) is approximately £177,000. Allowing for differences between existing and projected future GVA and between the areas covered (the project specific 60-minute drive-time Wider Region Study Area applied in the assessment extends beyond Greater London), the GVA per worker figures used in the PEIR are considered robust. These figures have therefore been adopted in the assessment presented in Sections 14.9 – 14.13 of the ES (Document Reference 6.1).
	Socio-economics			These are, however, minor points and therefore in view of the above, KCC has no objections to the proposed development in terms of the impact on County Council Service Provision.	N	The Applicant has noted, and welcomes this comment.

Table 3: Response and regard had to responses from the Greater London Authority (for the purposes of Section 42(1)(c) of the Planning Act 2008)

Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
Greater London Authority	Energy Generation Combined Heat and Power (CHP)	13.06.18	30.07.18	<p>GLA officers are of the view that the proposed facility cannot be supported for the following reasons: there is no need for further energy from waste facilities in London as it will not contribute to the circular economy and will likely suppress recycling rates in the capital; the development is described as 'Combined Heat and Power'-ready but has not demonstrated any demand for the heat produced; it is unlikely to achieve the Carbon Intensity Floor; and is expected to have adverse impacts on Air Quality for existing and future residents.</p>	N	<p>1. The Applicant has considered carefully the GLA's comments and produced a London Waste Strategy Assessment, which is contained in Annex A to the Project Benefits Report (Document Reference 7.2). See further below.</p> <p>2. The Applicant has considered carefully the GLA's comments and has produced a CHP Assessment (Document Reference 5.4). See further below.</p> <p>3. As part of the CHP Assessment, the Applicant has assessed the carbon intensity of REP. This assessment, contained in section 5.3 of the CHP Assessment (Document Reference 5.4) shows that REP is able to comply with the Carbon Intensity Floor target outlined in the Adopted and Draft London Plans and the London Environment Strategy.</p> <p>4. Regarding Air Quality, the Applicant has carried out an environmental impact assessment. The conclusions on Air Quality are contained in Chapter 7 to the Environmental Statement (Document Reference 6.1).</p>

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						Modelling of emissions from the Energy Recovery Facility has predicted that industry assessment thresholds (above which significant effects could occur) would not be exceeded, and there will be no significant effects on human health. In addition, emissions from the Energy Recovery Facility are not predicted to have a significant effect on ecological sites. No significant cumulative effects are predicted to arise as a result of REP in conjunction with other developments which would be under construction or operation at the same time as the Proposed Development.
	Energy Generation			The primary energy generating element of the proposed Riverside Energy Park is the Energy Recovery Facility, an energy from waste plant which produces energy through the incineration of waste. The ERF cannot be supported as it does not contribute to the circular economy and will likely suppress efforts to achieve recycling targets, as set out in draft London Plan S17, London Plan Policy 5.3 and the Mayor's London Environment Strategy (LES).	N	The Applicant has carried out a detailed assessment using a range of scenarios based on the different waste forecasts and recycling and recovery policies within London. This assessment demonstrates that REP is required to deliver sustainable waste management and net self-sufficiency within London. The assessment, which has regard to the GLA's comments on the circular economy and recycling rates, was also carried out pursuant to paragraph 2.5.66 of NPS EN-3, is called the London Waste Strategy Assessment, and is contained in Annex A to the Project Benefits Report (Document Reference 7.2).

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	Combined Heat and Power (CHP)			<p>The applicant has not demonstrated that there is any demand for the proposed facility. Further, if London is to meet its reduction and recycling targets, there will be 153,000 tonnes of surplus Etw capacity by 2030; therefore, there is no need for additional EfW plants to process London's waste. It is considered that the proposals would prejudice the Government's core objective of sustainable development with regard to waste as set out in the revised NPPF. Approving the ERF would also be detrimental to the Government's approach for meeting new ambitious recycling targets agreed to under the EU Circular Economy Policy package.</p> <p>Whilst the development is described as 'CHP-ready', and given the existing energy from waste facility has not yet utilised heat off-take after 15 years of operation, it is not considered that the proposed ERF could meet the Carbon Intensity Floor, as required by draft London Plan SI8 and the LES, or could</p>		<p>The Assessment clearly demonstrates that REP is in accordance with both the London Plan, adopted and draft, and the National Policy Statements EN-1 and EN-3.</p> <p>The Applicant, having regard to the GLA's comments on CHP and pursuant to section 4.6 of NPS EN-1 and paragraphs 2.5.26 and 2.5.27 of NPS EN-3, has produced a CHP Assessment. In summary, REP is located within a Heat Network Priority Area, will be CHP Enabled and will include all the on-site infrastructure necessary to connect to a heat distribution network. The Applicant continues to actively engage with LBB and other key relevant stakeholders to deliver this network, and considers this element of REP carries the opportunity for significant and direct societal benefits in the local area.</p>

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				<p>demonstrate demand for the heat produced. Furthermore, the incineration of waste would have unacceptable air quality impacts on existing residents and on future residents in the London Riverside and Bexley Riverside Opportunity Areas.</p> <p>The anaerobic digestion facility, battery storage and PV panels are supported in principle as they allow the generation and storage of entirely renewable energy.</p>		
	<p>Energy Generation Combined Heat and Power (CHP) Policy</p>			<p>The ERF, an energy from waste plant, is the primary element of the proposed REP, with the anaerobic digester, battery storage and potential CHP being secondary in terms of energy generation, storage and transfer. The principle of an additional energy from waste (EfW) plant is not supported by the Mayor as it fails to accord with London Plan and draft London Plan policies on energy generation, energy from waste, the circular economy and air quality.</p> <p>It is acknowledged that the Planning Inspectorate will have regard to the National Policy</p>	N	<p>As explained above, the Applicant has carried out a detailed assessment using a range of scenarios based on the different waste forecasts and recycling and recovery policies within London. This assessment, the London Waste Strategy Assessment, is contained in Annex A to the Project Benefits Report (Document Reference 7.2). The Assessment clearly demonstrates that REP is in accordance with both the London Plan, adopted and draft, and the National Policy Statements EN-1 and EN-3 and demonstrates a clear and urgent need for REP (in terms of both waste management and energy generation).</p>

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				<p>Statements . In line with the National Policy Statement for Energy, National Policy Statement for Renewable Energy, and the National Planning Policy for Waste (NPPW), it is considered that the proposals would prejudice both London's reduction and recycling targets as well as the Government's core objectives for sustainable development for waste, as set out in the revised NPPF.</p> <p>Specifically, NPPW sets out what waste planning authorities should consider in determining waste planning applications:</p> <ul style="list-style-type: none"> • only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational 		<p>In addition to the Project Benefits Report, the Applicant has prepared a Planning Statement (Document Reference 7.1) which explains how the Proposed Development conforms to national, regional and local planning policy. The Applicant has had regard to the GLA's comments on policy in assessing compliance with planning policy, with the conclusions set out in the Planning Statement accompanying the Application.</p> <p>The Applicant has continued to engage with the GLA throughout the application process.</p>

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				<p>facilities would satisfy any identified need;</p> <ul style="list-style-type: none"> • recognise that proposals for waste management facilities such as incinerators that cut across up-to-date local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy; and • consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B (locational criteria) of the NPPW and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid 		

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				<p>carrying out their own detailed assessment of epidemiological and other health studies.</p> <p>The Government has also indicated that despite leaving the EU, it will agree the EU Circular Economy Policy package adopted by the European Council in May this year and transpose into UK law at a later date. The CE package sets ambitious waste targets for EU Member States including 65% municipal waste recycling by 2035, 70% recycling for packaging waste by 2030, and that separate collections for biowaste (food waste) are in place by December 2023. Approving the ERF would also be detrimental to the Government's approach for meeting these new targets.</p>		
	Policy			<p>In terms of Mayoral policy, new waste management sites will be assessed against various criteria, in accordance with draft London Plan Policy S1B and London Plan Policy 5.17, including: locational suitability; nature of the activity;</p>	N	<p>In having regard to these comments, the Applicant has prepared the London Waste Strategy Assessment, contained in Annex A to the Project Benefits Report (Document Reference 7.2), and the Planning Statement (Document Reference 7.1).</p>

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				<p>proximity to source of waste; achieving a positive carbon outcome, where the demonstrable steps of this include a commitment to source truly residual waste (non-recyclable waste), a commitment to delivering the necessary means for heat supply infrastructure to meet the minimum CO2 standard known as the 'carbon intensity floor' or CIF; the impact on surrounding amenity, including air quality, odour and noise; environmental Impact of transportation, with use of river and rail networks supported; and social benefits.</p> <p>The draft London Plan introduces a policy, Policy SI7, on the circular economy, which aims to keep materials in their highest value for as long as possible, resulting in minimal levels of residual waste; this builds on London Plan Policy 5.3 which seeks to maximise reuse and recycling. Draft London Plan Policy SI7 also seeks to meet the Mayor's recycling targets: recycling 65% of municipal waste by 2030 and 95% of all</p>		<p>In addition, having regard to the GLA's comments on CHP and pursuant to section 4.6 of NPS EN-1 and paragraphs 2.5.26 and 2.5.27 of NPS EN-3, the Applicant has produced a CHP Assessment (Document Reference 5.4). Section 5.3 of the CHP Assessment contains the Applicant's assessment of REP's carbon intensity. This shows that REP is able to comply with the Carbon Intensity Floor target outlined in the Adopted and Draft London Plans and the London Environment Strategy.</p> <p>The Application fully demonstrates REP's conformity with national, regional and local policy objectives, as explained above.</p>

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				construction, demolition and excavation waste by 2020.		
	Energy Generation			Energy from waste (EfW) is the least desirable form of waste disposal after landfill, as it destroys materials and releases greenhouses gases. Within the waste hierarchy, as noted in the Mayo(s London Environment Strategy and within the Government's 2011 guidance note on the waste hierarchy, the primary aim is to 'prevent' (using fewer materials and keeping products in their highest value for longer) followed by 'preparing for re-use' and 'recycling' (refurbishing materials for re-use as a whole or through turning waste into a new product). It should be noted that commercial waste can also be considered municipal waste, if similar In composition, even if it is not collected by a local authority. Commercial waste can, therefore, also contribute towards recycling targets.	N	Please see the comments above which demonstrates how the Applicant has had regard to the GLA's concerns.
	Waste Management			Whilst the proposed ERF may reduce the export of waste to landfill, it does not contribute to the transition to the circular		

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				<p>economy, in accordance with draft London Plan Policy SI7, as it does not promote the retention of materials in their highest value, as per the waste hierarchy. In line with the waste hierarchy, commercial and industrial waste must be kept in its highest value for as long as possible and then considered for recycling, before it is would be appropriate to dispose of this waste via Incineration. Further, with regard to black bag rubbish, whilst much is considered to be non-recyclable, many recyclable products are incorrectly disposed of in black bags and many local authorities still do not provide separate food waste bins; as such, EfW plants also burn recyclables or green waste that could contribute to the circular economy and recycling targets in London.</p> <p>Modelling used to develop the Mayor's London Environment Strategy and inform the draft London Plan showed that achieving the Mayor's reduction and recycling targets will mean that no new EfW facilities</p>		

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				<p>(defined as incineration, gasification and pyrolysis) in London will be needed, with an expected 153,000 tonnes surplus EfW capacity by 2030. The new facility, together with the neighbouring RRR incinerator facility would result in approximately 1.5 million tonnes of waste being burned on the site (670,000 t/pa in the existing facility and up to 805,000 t/pa in the proposed facility) and increase London's incineration capacity to nearly three million tonnes (representing nearly 50 per cent of London's total municipal waste arisings). Simultaneously, London is expected to need, or need access to, an additional 1.4 million tonnes of recycling infrastructure (in addition to existing capacity) to meet the self-sufficiency target and recycling targets, set out in London Plan 5.17, draft London Plan SIB and the LES. The Mayor's net self sufficiency target should not encourage the import of waste from other regions, but should encourage less of London's waste being exported</p>		

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				<p>in order to preserve the benefits for London and Londoners.</p> <p>The current municipal recycling rate is 41%, where considerable improvement is needed to reach the Mayor's 65% target by 2030. London and the UK's local authority collected waste recycling rate has stalled over the past five years, whilst its incineration rate has doubled (from 900,000 tonnes to 2 million tonnes in London, and from 4.6 million tonnes to 9 million tonnes nationally). Additional thermal EfW capacity would likely stifle growth in recycling rates, because they require large volumes of waste to treat in order to be cost effective and to operate efficiently. Whilst thermal EfW plants deliver energy generation benefits, they do so by destroying waste materials along with their intrinsic value, prejudicing movement up the waste hierarchy, and creating harmful air pollutants and greenhouse gases. Approving the facility will have a detrimental impact on London and the UK achieving its recycling targets,</p>		

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				<p>and also counters measures that the Government will need to take for the UK to meet ambitious recycling targets under the EU Circular Economy Policy Package.</p> <p>The applicant has not identified a clear need for the EfW facility, either locally or nationally, or identified where the waste will come from, noting only that waste will be “sourced from the waste market in London, and the surrounding area, once operational”. It is considered, therefore, that the proposals will artificially increase demand, through creating additional speculative capacity. At the same time, expanding the capacity for London's incineration will likely suppress recycling rates, as waste that could otherwise be recycled may be redirected to the incinerators and thereby prejudice movement up the waste hierarchy. In addition, without an identification of the key sources, it is not possible to ascertain whether the waste could be used higher up the waste hierarchy, as required</p>		

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				by paragraph 3.4.3 of the National Policy Statement for Energy.		
	Principle of Proposed Development			<ul style="list-style-type: none"> - Energy from Waste - Mayoral Policy - Need for additional waste capacity 		The Project and its Benefits Report (Document Reference 7.2) provides details of the benefits and need of REP.
	Energy from waste – Impact on locality			The applicant stresses the social economic benefits of the scheme, in accordance with the requirements of London Plan Policy S.17 and draft London Plan Policy SIB, stating that, once operational, the development could create 75 permanent jobs; however, it is not clear whether these are additional jobs or whether the two plants would share staff. It is also argued that the REP operation would provide approximately £16.87 million and £24.9 million per annum to the local and national economies respectively; however, financial and employment benefits could also be achieved through the creation of a waste plant that aligns with Mayoral policies on the circular economy and recycling. The economics of the EfW plant further suggests that	N	<p>The job numbers quoted within the assessment relate solely to the REP operation.</p> <p>Chapter 14 of the ES (Document Reference 6.1) includes a model-based approach that was used to calculate gross direct employment from the construction and operational phases of the Proposed Development. The gross operational employment figure (75 FTE) took account of present employment levels in the RRRF to assess the additional employment required to operate REP. Consistent with HM Treasury Green Book guidance, additionality factors (leakage, displacement, deadweight and multiplier effects) were then applied to calculate net employment effects. This approach is considered robust and has been adopted in the assessment presented in Sections 14.9 – 14.13 of the ES.</p>

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				<p>the provision of the facility would financially disincentivises recycling and reuse of materials, due to the length of contracts between LPAs and energy providers.</p> <p>As discussed further below, it is considered the ERF could have an adverse impact on local air quality, primarily within Rainham, on the north side of the river, due to the direction of prevailing winds, and could limit the success of London's Opportunity Areas. Further, the air quality report already represents the 'best case scenario', as such, it is not considered that there is scope for any additional mitigation measures to limit or reduce these impacts. GLA officers will thoroughly investigate air quality once the full technical details are available at the next stages of consultation and examination. The air quality impact is considered to be contrary to draft London Plan Policy S18 and London Plan Policy 5.17, which specifically discuss energy from waste.</p>		<p>The assessment presented in Sections 14.9 – 14.13 of the ES includes consideration of likely effects from the Proposed Development on key business sectors, including waste management and energy generation. In addition, the assessment of net employment effects takes account of potential displacement of existing economic activities.</p> <p>The London Waste Strategy Assessment (Annex A to the Project Benefits Report (Document Reference 7.2)) concludes REP will not disadvantage recycling rates in the capital and that it is a very necessary part of the infrastructure needed to achieve both the waste management and energy recovery targets set out in the relevant strategies and plans.</p> <p>Regarding Air Quality, the Applicant has carried out an environmental impact assessment. The conclusions on Air Quality are contained in Chapter 7 to the Environmental Statement (Document Reference 6.1). Modelling of emissions from the Energy Recovery Facility has predicted that industry assessment thresholds (above which significant effects could occur) would not be</p>

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						<p>exceeded, and there will be no significant effects on human health. In addition, emissions from the Energy Recovery Facility are not predicted to have a significant effect on ecological sites. No significant cumulative effects are predicted to arise as a result of REP in conjunction with other developments which would be under construction or operation at the same time as the Proposed Development.</p> <p>An Air Quality Technical Note was provided to the GLA as part of the ongoing consultation and is provided in Appendix J.5 of the Consultation Report (Document Reference 5.1).</p>
	Energy from waste – Carbon Intensity Floor			<p>The Mayor expects all of London's EfW facilities to only manage truly non-recyclable waste, and maximise the use of both the heat and power generated. To support this, and in addition to developing the EPS, a minimum carbon emissions performance standard has been set, known as the Carbon Intensity Floor (CIF).The CIF was first introduced in 2011 and was developed to help decarbonise London's energy supply by encouraging clean, efficient and local energy</p>	N	<p>A full Carbon Intensity Floor assessment is included in the CHP Study (Document Reference 5.4). The assessment has been undertaken in accordance with GLA approved methodology and demonstrates that REP will achieve the Carbon Intensity Floor requirement set out in regional planning strategies. The Applicant notes the GLA's comment on a section 106 Agreement; the Applicant will be engaging with the London Borough of Bexley of the terms of any such agreement.</p>

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				<p>generation from London's non-recycled waste. The CIF works to ensure that any energy generated from London's municipal waste is no more polluting in carbon terms than the source of energy generation it displaces.</p> <p>Waste going to Etw plants often contains large amounts of recyclable materials that are high carbon and high value, as noted above. Reducing the amount of high carbon materials particularly plastics and metals going to Etw plants will deliver GHG savings, and reduce the reliance on fossil fuels. This will drive change and investment within boroughs and with facility operators, to ensure that truly residual waste is used to generate both heat and power for the benefit of Londoners.</p> <p>Notwithstanding the Mayor's view that London does not need further EfW plants, if the Secretary of State grants permission for the REP, a requirement to meet the CIF from the start of the proposed plant's operation, in addition to</p>		<p>REP will be constructed in accordance with Schedule 1 of the draft DCO. The carbon intensity assessment contained in section 5.3 of the CHP Assessment (Document Reference 5.4) has been carried out based on the development as defined in Schedule 1. Should the DCO be authorised, the Applicant will only have the authority to construct the development as defined in Schedule 1.</p>

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				<p>monitoring, should be secured within a Section 106 Agreement.</p> <p>Any new EfW facility must meet the minimum greenhouse gas performance from 'day 1' of operation. As set out in London Plan Policy 5.16 and draft London Plan Policy S18. The CIF is set a 400 grams of CO2 equivalent per kilowatt hour of electricity produced. In order to achieve this, the facility must commit to implementing all demonstrable steps as a minimum, as set out in paragraph 9.8.13 of the draft London Plan, namely:</p> <ul style="list-style-type: none"> • Committing to source truly residual waste. The use of a pre-treatment facility maybe necessary to recover all materials for recycling before treatment via the REP; • Commit to invest in and delivery the necessary means for infrastructure via the CIF, this should include investment in the development of a heat distribution network beyond the site boundary. The heat network should be installed and operational from first operation of 		

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				<p>the new facility; and</p> <ul style="list-style-type: none"> • An agreed timeline for the implementation of the proposed measures. 		
	<p>Energy Generation</p> <p>Energy from waste – Heat offtake and CHP-readiness</p>			<p>The 2013 Department of Environment and Rural Affairs (DEFRA) publication on the incineration of municipal waste identified the key issues affecting energy recovery from Incinerators. While electricity can easily be supplied into the national grid, once an appropriate connection is established, heat will need to be used locally and will be dependent on identifying and establishing a local need by using a district heating system for buildings/housing and/or supply of heat to a factory for industrial use. To date this has required significant public sector involvement to address.</p> <p>The difficulty in establishing district heating in the UK was attributed to not having a substantial history in the use of district heating systems, having relied on indigenous fossil fuel reserves, unlike in Scandinavian countries where it is common</p>	N	<p>The CHP Assessment (Document Reference 5.4) identifies existing and future heat consumers, so the Applicant considers that the requirements of the NPS for Energy relating to identifying existing and future heat consumers have been complied with. As required by NPS EN-1 and NPS EN-3, the latest government guidance on CHP assessment (the CHP-Ready Guidance and the cost-benefit assessment guidance) has been followed. As the Project Benefits Report (Document Reference 7.2) explains, it is not a question of whether the RRRF or REP should operate with CHP, but rather recognition of the need for <i>both</i> energy generating facilities operating with CHP.</p>

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				<p>place to use locally available resources such as wood and peat. With increasing energy costs and the need to move away from the use of fossil fuels, the DEFRA report stated that district heating may become attractive in the UK, and that the Government (at the time of publication) had incentivised the use of heat through the development of the Renewable Heat Incentive (RHI) and Renewables Obligation Certificates (ROCs) where a good quality CHP is in place.</p> <p>The 2009 Department of Energy and Climate Change (DECC) paper on the potential of district heating networks identified three key barriers, economic, project costs and institutional issues, to the deployment of district heating in the UK:</p> <ul style="list-style-type: none"> • The key economic barrier was the cost of capital (rate of return) required to invest in the heat network and its connections and that this was a core driver of the cost competitiveness of any scheme that reflected the risk (actual or perceived) of investing 		

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				<p>in the project.</p> <ul style="list-style-type: none"> • The project cost drivers are structural and relate to the mix of the housing stock in the UK, which increases the unit cost of building a network compared to, for example, Finland, where there are a higher proportion of flats and apartments, which increases the heat density and makes the district heating network more cost effective. • Institutional issues are based on the example of European countries that have successfully developed extensive DHNs which strongly suggested that any drive to deploy district heating must be led by the public sector. Otherwise potential private sector investors in heat networks will be looking for underwriting of the identified project risks by the public sector. <p>The two long-established incinerators in London, the Edmonton EcoPark in Enfield and the South East London Combined Heat and Power (SELCHP) in Bermondsey, operated in electricity-only mode for many years. Edmonton is</p>		

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				<p>now in the advanced stages of constructing a heat off-take as a result of the local borough's response to the Mayors Upper Lea Valley Opportunity Area Planning Framework, Mayors previous Climate Change Strategy and development support. Owned by Veolia, the SELCHP heat off-take was finally established after some 15years and was led by Southwark Council (and now serving 2,500 homes).Southwark Council'swaste Private Finance Initiative contract with Veolia fell short of the carbon reductions required by the waste policy targets. Southwark Council required Veolia to deliver the carbon savings by supplying heat to Southwark housing from SELCHP to displace the use of gas.</p> <p>A recent example of public sector involvement is the new Viridor incinerator, which is under construction at Beddington in the London Borough of Sutton.The plant was consented under the previous Mayoral administration. Both GLA planners and the</p>		

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				<p>Environment team worked closely with Sutton to ensure that the plant was procured with an efficient heat off-take and that Viridor worked closely with Sutton Council to establish the heat supply arrangements, make financial contributions to associated initiatives and form a heat network working group. The GLA provided Sutton Council with development support for the first phase of the heat network that has been procured, with the first connections to be made in the next year. The GLA is currently supporting the development of the second phase of the heat network.</p> <p>Furthermore, as set out in a 2007 Department of Energy & Climate Change note, which provides guidance on Section 36 of the Electricity Act, and also set out in National Policy Statement for Energy, applicants are advised to engage with planning authorities to ensure that existing and future heat customers are identified as well as contact DEFRA's Good Quality CHP team to ensure that they have</p>		

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				<p>fully explored incentives for CHP and the economic benefits of Good Quality CHP.</p> <p>The applicant has not provided sufficient detail on the heat offtake potential of the proposed REP noting only that it is CHP-ready; this is particularly important in the context of the existing EfW plant which is also equipped with heat offtake as a planning requirement, as there is no heat network at present which transfers this to homes. The GLA is currently supporting Bexley Council, Peabody and the applicant to study the feasibility of supplying heat from the existing RRR to the Thamesmead and Abbey Wood Opportunity Area. As such, given experience of previous schemes throughout London, the applicant's proposed EfW plant would not establish a heat offtake without the involvement of the public sector, and without a heat network, it would be unlikely to achieve the CIF. For the avoidance of doubt, an EfW facility that generates electricity</p>		

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				<p>only is not acceptable, it must also capture heat.</p> <p>Further, given the untapped capacity of the neighbouring EfW plant and the number of years that it has been active for, it would be many years, if not decades, before the local heat demand exceeded the existing supply capacity. The site lies in close proximity to the Thamesmead and Abbey Wood Opportunity Area and the Bexley Riverside Opportunity Area, where the Mayor is seeking a minimum of 6,000 and 8,000 new homes respectively. Homes have begun to be constructed in the Thamesmead OA, whereas Bexley Riverside OA is approximately 5 years behind this. Whilst this evidences that significant growth is projected in the area, the existing RRR is expected to be able to provide heat to in excess of 26,000 homes. Given the potential heat off take capacity of the existing RRR, it is not considered that there is currently demand for the heat from the proposed ERF and there will not be for a significant</p>		

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				<p>period of time. The proposed would therefore not accord with the requirements of the NPS for Energy, relating to identifying existing and future heat customers.</p> <p>Finally, proposals must be consistent with the Government's energy policy and its goal of reducing carbon emissions, maintaining the reliability of energy supply and promoting competitive markets as well as ensuring that every home is adequately and affordably heated.</p>		
	<p>Policy</p> <p>Air Quality</p>			<p>1] The London Plan, draft London Plan and London Environment Strategy (LES) do not differentiate between different types of emissions, as the impact upon human health is dependent on the content rather than the source of emissions. London Plan Policy 7.14 and draft London Plan Policy Sil seek to improve air quality across London and limit exposure to poor air. Draft London Plan Policy Sil provides further details, stating that development proposals should not: lead to</p>	N	<p>To respond to these points, an Air Quality Technical Note was provided to the GLA as part of the ongoing consultation and prior to a meeting with the Applicant on 11th September 2018. The Applicant's response to these points is therefore contained in that note, which is in Appendix J.5 of the Consultation Report (Document Reference 5.1)</p> <p>Regarding the Application, the Applicant has carried out an environmental impact assessment. The conclusions on Air Quality are contained in Chapter 7 to the</p>

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				<p>further deterioration of existing poor air quality; create new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; reduce air quality benefits that result from the Mayor's or borough's activities to improve air quality; or create unacceptable risk of high levels of exposure to poor air quality.</p> <p>[2] For energy-from-waste sites, however, there are additional pollutants to be considered compared to a normal gas-fired energy centre: incineration of solid waste can lead to emissions of toxic heavy metals, dioxins, furans and other substances that are detrimental to human health and biodiversity.</p> <p>[3] Prior to the consultation period, the applicant received written comments GLA officers regarding air quality, the scope and the content of the assessment. The PEIR has not incorporated GLA officers' recommendations into the</p>		<p>Environmental Statement (Document Reference 6.1). Modelling of emissions from the Energy Recovery Facility has predicted that industry assessment thresholds (above which significant effects could occur) would not be exceeded, and there will be no significant effects on human health. In addition, emissions from the Energy Recovery Facility are not predicted to have a significant effect on ecological sites. No significant cumulative effects are predicted to arise as a result of REP in conjunction with other developments which would be under construction or operation at the same time as the Proposed Development.</p>

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				<p>assessment; specifically, it does not fully assess the cumulative impacts of both traffic and operational emissions, nor was it accepted that the requirement to restrict CHP emissions would apply to their development.</p> <p>[4] The emissions from the ERF have been modelled based on the expected requirements of the current draft European Best Available Technique Reference (BREF). BREF notes, and in particular the emerging BREF notes, set out the best that can be achieved in practice in terms of emissions, including using all available mitigation and abatement measures. Given the use of the BREF notes, the air quality assessment within the PEIR is optimistic and represents the 'best case scenario', and it should not be anticipated that the emissions could be further improved in order to make the plant acceptable.</p> <p>[5] The site's location benefits from prevailing wind, generally blowing towards the river,</p>		

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				<p>meaning that the most significant impacts occur over the water; however, this does not mean that there are no impacts on existing receptors. The impact is particularly clear north of the river in Rainham, in the London Borough of Havering.</p> <p>[6] Nitrogen Dioxide impacts from the plant are described within the PEIR as negligible at all receptors that were considered; however, the isopleth maps appear to show that there would be at least a risk of more significant impacts on Rainham town centre, including a potential risk to compliance with legal limits. The overarching NPS for Energy states that in the event that a project will lead to non-compliance with a statutory limit the IPC should refuse consent. More concerning than Nitrogen Dioxide are the Arsenic and Nickle impacts, which are shown to be "minor adverse.. at a number of explicitly modelled receptors. Again, the isopleth maps in the PEIR showed that these impacts could be relatively widespread across Rainham. In</p>		

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				<p>addition to these impacts on human receptors, the assessment also shows non-negligible impacts of biodiversity receptors at Crossness Nature Reserve, as well as Ingreborn and Inner Thames Marches. The NPS for Renewable Energy states that these particulates should be a consideration when the Planning Inspectorate assesses the application, and the overarching NPS for Energy also indicates that air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality</p> <p>The air quality impact does not just impact existing residents. The site lies within the Bexley Riverside Opportunity Area, near Thamesmead & Abbey Wood Opportunity Area and across the river from the London Riverside Opportunity Area. The impacts of the proposed incinerator would, therefore, likely impact the future delivery of housing growth in these areas, and, as such, would</p>		

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				<p>run contrary to London Plan Policy 2.13 and draft London Plan 501. The development does not comply with the emphasis on 'good growth' which is central to the draft London Plan Policy. One such good growth policy, Policy GG3, states that development in London should improve Londoners' health and reduce health inequities. The ERF facility is clearly contrary to these policies.</p> <p>[7] In addition to the direct impacts of combustion there are potential impacts from road and river transport. Although the PIER asserts that these will be acceptable a more detailed assessment would be expected in the EIA to accompany any full application</p> <p>[8] The applicant has not demonstrated that the development would be acceptable in air quality terms. The modelling is optimistic in terms of emissions and GLA</p>		

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				<p>officers do not consider that the proposals could be made acceptable through additional mitigation .The development and the air quality assessment does not, and cannot, comply with London Plan Policy 7.14 and draft London Plan Policy Sil and 513 or NPS requirements.</p> <p>[9] In order to show that the development could be acceptable the applicant would need to show:</p> <ul style="list-style-type: none"> • That there is no risk to compliance with legal air quality limits (noting that all possible abatement technologies have already been assumed); and • That impacts from road and river transport are acceptable. <p>[10] Although the Renewable Energy NPS suggests that the health impacts of pollutants such as heavy metals can be ignored where Waste Incineration Directive emission limits are met, we would also recommend that, given the sensitivity of the receptors and the scale of the predicted impact, the applicant also has a moral duty to</p>		

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				demonstrate the impact of these emissions on the health of nearby residents. [11] Given the size of the ERF and its dominance in the proposals, the above comments primarily relate to air quality impacts from incineration. The proposed Anaerobic Digestion plant, if providing gas to the grid, would be acceptable in air quality terms for the following reasons: whilst grid gas use in domestic and commercial boilers do emit Nitrogen Dioxide, the emission source is pre-existing and so there would be no additional impact on local air quality at the point of use; and the PEIR seems to show that the Impacts from traffic emissions from vehicles, associated only with the AD facility, serving the site would be acceptable.		
	Air Quality			Various	N	To respond to these points an Air Quality Technical Note was provided to the GLA prior to a meeting that was held on September 11 th 2018 as part of the Applicant's ongoing consultation. The Applicant's response to these points is therefore contained in that note, which is in in Appendix J.5 of the

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						<p>Consultation Report (Document Reference 5.1).</p> <p>Regarding Air Quality, the Applicant has carried out an environmental impact assessment. The conclusions on Air Quality are contained in Chapter 7 to the Environmental Statement (Document Reference 6.1).</p> <p>Modelling of emissions from the Energy Recovery Facility has predicted that industry assessment thresholds (above which significant effects could occur) would not be exceeded, and there will be no significant effects on human health. In addition, emissions from the Energy Recovery Facility are not predicted to have a significant effect on ecological sites. No significant cumulative effects are predicted to arise as a result of REP in conjunction with other developments which would be under construction or operation at the same time as the Proposed Development.</p>
	River Freight			Draft London Plan Policy SI14 promotes the transportation of freight by river and states that proposals which increase the use of safeguarded wharves for such a use will be supported.	N	REP will predominantly be a river fed facility, maximising the use of the existing jetty and the Applicant's river transportation infrastructure to both bring in waste, and export ash for recycling.

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				<p>Whilst the ERF element of the proposed development would utilise the river and maximise the use of the existing wharf, which is supported, it is considered that the site's wharf and the river could be also be utilised in a scheme which accords with the aims of the circular economy or contributes to meeting the Mayor's recycling targets. Should the Secretary of State permit the proposed development, the applicant should be conditioned to exclusively bringing waste to the site by river, as is required in the existing RRR.</p>		<p>Food waste for the Anaerobic Digestion facility within REP is anticipated to be transported by road. Food waste currently collected within Bexley is currently transported by road to treatment facilities outside of London. REP will offer a local 'in borough' treatment solution.</p> <p>The EIA assesses a 100% transportation by road scenario. This is only because as part of the EIA, it is required to assess the 'worst case' from a road transport perspective, which would involve road usage in the event of a jetty outage.</p> <p>It should be noted that the existing RRRF does not have a condition to exclusively bring waste to the site by river.</p>
	Townscape and Visual Impacts			<p>London Plan Policy 7.17affords Metropolitan Open Land (MOL) the strongest possible protection, whilst Policy G3 of the draft London Plan states that MOL should be protected from inappropriate development and proposals that harm MOL should be refused. Both policies state that national Green Belt policies, set out within the NPPF, apply to MOL and therefore MOL is</p>	N	<p>The TVIA considers likely effects of the Proposed Development upon Metropolitan Open Land (MOL) as designated land as shown in Figure 9.2 of the ES (Document Reference 6.3).</p> <p>The Applicant is in close consultation with Natural England and the Friends of Crossness Nature Reserve. A Biodiversity Assessment (Chapter 11 of the ES) and a Townscape and</p>

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				<p>offered the same protection as Green Belt. Chapter 9 of the NPPF is entitled 'protecting Green Belt land' and applies equally to MOL. Paragraph 79 states that the fundamental characteristic of the Green Belt is its openness and its permanence and a key purpose of the Green Belt is to prevent encroachment that would reduce green space, as per paragraph 80.</p> <p>The site lies adjacent to Crossness Nature Reserve, which is designated MOL. One of the proposed options for the electrical cable connection route to Littlebrook runs via the western edge of the Nature Reserve. Cables would be laid in ditches on the western edge of MOL, before the land would be made good on top. The applicant should pursue the electrical connection route via Norman Road, to avoid any direct impact on the MOL.</p> <p>Notwithstanding the above, the scheme, due to its design and size, will cause harm to the openness of the MOL and a</p>		<p>Visual Impact Assessment (Chapter 9 of the ES) is included as part of the Application. These consider likely significant biodiversity effects on the Crossness Nature Reserve, townscape (including townscape/landscape character) effects upon the MOL designation and the Crossness Nature Reserve (CNR), and effects on people's views from the CNR and from Public Rights of Way within the designated MOL. The assessment's conclusion is that REP would have a moderate level of significance on MOL, which is considered acceptable.</p> <p>Regarding the option of installing the cable on the western edge of the Nature Reserve, if this option were to be chosen then the construction impacts would be temporary in nature. This is considered acceptable in the context of the MOL.</p> <p>For Air Quality, see responses above) is included as part of the Application. These consider likely significant biodiversity effects on the Crossness Nature Reserve, townscape (including townscape/landscape character) effects upon the MOL designation and the Crossness Nature Reserve (CNR),</p>

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				<p>negative impact upon the views out of the nature reserve towards the river. It is acknowledged that the existing Riverside Resource Recovery facility lies to the north east of the nature reserve, whilst the Thames Water plant lies to the north west, but at present there remains a strip of land where views toward the river are not terminated or punctuated by a large plant. The applicant should fully explore the impact of the plant on MOL and the aspect of harm.</p> <p>Furthermore, there are concerns, as discussed above, that the air quality impacts of the development would have a non-negligible impact on the biodiversity of the nature reserve, which could fundamentally change its character.</p>		<p>and effects on people’s views from the CNR and from Public Rights of Way within the designated MOL. The assessment’s conclusion is that REP would have a moderate level of significance on MOL, which is considered acceptable.</p> <p>Regarding the option of installing the cable on the western edge of the Nature Reserve, if this option were to be chosen then the construction impacts would be temporary in nature. This is considered acceptable in the context of the MOL.</p> <p>For Air Quality, see responses above</p>
	Flood Risk			<p>London Plan Policy 5.12 and draft London Plan Policy 5112 state that development proposals should ensure that flood risk is minimised and mitigated against. Any proposals be designed to remain operational under flood conditions. London Plan Policy</p>	N	<p>The Applicant has been in consultation with both the Environment Agency (EA) and the Lead Local Flood Authority (London Borough of Bexley - LBB) throughout the assessment and the development of the application documents.</p>

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				<p>5.13and draft London Plan Policy 513 provide guidance on sustainable drainage, stating that development should aim to achieve greenfield run off rates and ensure that surface water is managed as closely as possible to its source and in ways that use water efficiently.</p> <p>The proposed development is located within Flood Zone 3; therefore, sequential and exception tests are required by the NPPF in any application. The applicant proposes to set the level of power generation and related infrastructure above flood levels arising from any breach of the River Thames tidal defences, which is supported in line with London Plan Policy 5.12 and draft London Plan Policy 5112. However, given that the proposed building envelope appears to be within 16 metres of the River Thames flood defences, the applicant will need to agree works with the Environment Agency.</p> <p>With regard to drainage, in accordance with draft London</p>		<p>A Flood Risk Assessment (FRA) is included as part of the Application (Document 5.2). The FRA considers the sequential and exception tests, in accordance with NPPF 2018.</p> <p>Due to the high water table in the vicinity of the application site and potential risk of contamination it has been agreed with the EA that SuDS measures are not considered appropriate for the Proposed Development. A drainage strategy has been prepared in consultation with the EA and LBB (as Lead Local Flood Authority). An outline drainage design strategy is contained in Appendix G to the FRA. Section 5 of the strategy contains the greenfield run-off calculation. The outline drainage design strategy is secured via a requirement contained in Schedule 2 to the draft DCO.</p> <p>REP will utilise potable mains water. Water use in the ERF process works on a 'closed loop' principal with steam generated as part of the process being condensed and reused within the facility.</p> <p>Given there is a detailed specification for the quality and content of any water entering the boiler of the ERF, the</p>

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				<p>Plan Policy Sil3 and London Plan Policy 5.13, the applicant should limit all post-development discharge rates to the greenfield value and should maximise the use of Su05 measures. In terms of water quality, the applicant is proposing a Su05 treatment train approach to manage water quality which is supported as an approach.</p> <p>[4] The applicant provides no details on the water demands of the development or how they would be supplied and it is noted that the Secretary of State's scoping opinion requires that water source and quantity information be provided. The applicant should use alternative sources of water for process requirements to reduce the reliance on 'wholesome water' and it is considered that the proximity to the Crossness Sewage Treatment Works would present a unique opportunity to work with Thames Water to source treated effluence for non-potable uses, with the dual benefit of reducing effluent discharge into the Thames and</p>		<p>Applicant is unable to utilise the recommendations of the GLA.</p>

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				<p>reduce reliance on these 'wholesome water'. Notwithstanding the lack of support for the principle of the proposal, given that London is 'water stressed', should the ERF be approved by the Secretary of State, the Mayor will expect the applicant to commit to the use of alternative water from Crossness Sewage Treatment Works.</p>		
	Transport			<p>A dedicated transport related pre-application meeting was held between the applicant and Transport for London on 1 May 2018. The applicant has circulated two documents to TfL officers: the first being a transport assessment scoping note which sets out the approach to assessment, the proposed trip generation methodology and the assumptions involved in the assessment; and the second document is a PEIR, which cover similar aspects in relation to the transport but covers more detail relating to the requirements for Environmental Impact Assessment and initial findings. The comments here relate to both documents</p>	N	The Applicant notes this comment

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	Transport – Trip Generation			<p>In terms of trip generation in the scoping note, TfL confirm that the approach appears to be reasonable; however, further information should be provided with regard to routing and the distribution of operational vehicles as there are different assignment patterns based on two scenarios. In addition, for the proposed construction vehicle distribution, predicted to be 50% using Eastern Way and 50% using Bronze Age Way, further evidence should be provided to justify the expected distribution. Given that the origins and destinations of construction material generally fall outside the M25 and that Normal Way is left in/ left out only, it is likely that a greater proportion of the construction vehicles will be routing eastward towards the M25. It would also be useful to provide graphical route maps to aid the understanding of the vehicle movements for all scenarios.</p> <p>The proposed mode share for operational staff is based upon 'Journey to Work' data from the</p>	N	<p>The distributions for the 25% road and 100% road scenarios are different as it is expected that waste to the ERF would be transported from different locations. This is set out in para 6.4.20 of the PEIR as follows:</p> <p><i>“The difference occurs as there could be a requirement to get waste from nearer locations and hence have flexibility in routing.”</i></p> <p>Regarding construction vehicle distribution; this stage of the process means that the suppliers and contractors have not yet been appointed and so there is uncertainty as to where construction materials would be delivered to/from. For this reason, and to avoid undertaking excessive alternative testing, a 50% east and 50% west distribution has been assumed, as a reasonable scenario to represent the delivery of construction materials to the Proposed Development. The left-in, left-out movement from Norman Road would not materially affect the distribution of the vehicles. During the construction peak (Month 13) it is predicted that there would be in the order of 22 goods vehicle visits per day (44 movements). Alternative distribution</p>

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				<p>2011 census; however, given the adjacent and comparable Riverside Resource Facility, it would be more appropriate to survey existing staff to understand their current travel patterns and mode share. An understanding for where staff live would also provide a more accurate account of trip distribution for assignment purposes. This information should be available from the RRR travel plan monitoring</p>		<p>scenarios (e.g. 60/40% split) would not materially affect the resultant network impacts.</p> <p>Data for how RRRF staff travel to work has been obtained and has been used to inform the assessments.</p>
	Transport – Highway and Public Transport Impact			<p>The scale and extent of highway modelling required can be confirmed once the baseline surveys have been undertaken and presented alongside the agreed proposed trip generation for the site. Where areas are highlighted from the baseline surveys and impact assessment, mitigation may be required. Improvements could potentially comprise possible junction improvements, such as new signals or signal alterations in order to optimise their operation.</p> <p>The PEIR suggests that driver delay is only likely to be an issue that requires mitigation where</p>	Y	<p>The two requested junctions have been included as sensitive receptors at Table 6.29 and for driver delay as introduced at paragraph 6.9.9 within Chapter 6 of the ES (Document Reference 6.1).</p> <p>Cumulative impacts have been considered in the assessments. The overall conclusion remains that impacts would be negligible in respect of transport.</p>

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				<p>junctions are operating beyond capacity. However, in London, practical operational capacity should not exceed 85% as junction operation can deteriorate quickly beyond this point as there is no spare capacity to deal with localised spikes in demand. The applicant should also consider total delay to all vehicles, and the mean delay per vehicle on each of the approaches. Both James Watt Way / Queens Road signalised junction and Larnar Road / Northend Road / Boundary Street roundabout are not included as transport sensitive receptors in the PIER and should be included.</p> <p>Crucially, the cumulative development in the area will be a key consideration and all development sites in the immediate locality will need to be considered and taken into account.</p>		
	Transport – Site access and design			Good quality pedestrian and cyclist access into the site should be provided in the detailed design of works to Norman Road and relevant junctions. As part of	Y	The requirement for PERS and CLoS assessments, as set out in the GLA’s response, was agreed at the pre-application meeting held with TfL. The

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				<p>this, the applicant should undertake an assessment of the local cycle Infrastructure and routes, particularly to the closest stations. A Cycle Level of Service (CLOS) assessment should be completed for the junction of A2016 Picardy Manorway I Norman Road as a minimum and should deficiencies be found, mitigations and improvements should be suggested. Whilst a full PERS audit is not required, an assessment should be undertaken for footways immediately outside of the site and routes towards local bus stops</p>		<p>results of these have been included at Appendices G and H respectively in the TA, which is appended to the ES (Document Reference 6.1).</p>
	<p>Transport – Car and operational parking</p>			<p>The documents provided do not set out the proposed car and operational parking provision; however, due to the potential future improvements to public transport and the pressures on the local highway network, the applicant should provide a low level of car parking, aiming for lower than the maximum standards allowed within the draft London Plan. A review of the provision of parking and the usage of this parking at the</p>		<p>At this stage of the process, the detailed design of car and cycle parking at the main REP site has not been undertaken.</p> <p>However, the level of car and cycle parking will conform with the requirements and standards set out within the London Cycling Design Standards and Draft London Plan, or other relevant policy/guidance, at that time.</p>

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				<p>adjacent and comparable RRR should form part of the evidence base to justify appropriate parking levels for the Riverside Energy Park. In addition, 10% of the overall parking spaces should be provided as Blue Badge compliant parking spaces. The details of the management of car parking spaces should be included in the TA as part of a Car Park Design and Management Plan. In accordance with draft London Plan standards, TfL requests that all car parking spaces be fitted with Electric Vehicle Charging Points.</p> <p>Short distance cycle trips will be crucial to link the development to the public transport interchanges at Belvedere and Abbey Wood stations as well as the surrounding residential areas and the Belvedere growth area. Cycle parking should be provided in accordance with draft London Plan Policy TS standards and it should be designed to be easy, safe and convenient to use.</p>		<p>An Operational Worker Travel Plan would be secured as a Requirement of the DCO. That document would detail the number of cycle and car parking spaces in relation to the people working at and visiting REP. It would identify how those spaces were to be configured, located and managed. An outline Operational Worker Travel Plan is provided at Appendix M of the TA, identifying the principal coverage for the final Operational Worker Travel Plan.</p>

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				All cycle parking should be designed in accordance with the London Cycling Design Standards (LCDS) and the location described in the TA. The LCDS recommends that at least 5 per cent of all spaces should be capable of accommodating a larger cycle. There should also be provision for showers and storage facilities as part of the development.		
	Transport – Construction			TfL has concerns regarding the level of potential disruption caused by the construction of the proposed development, including the laying of the Electrical Connection Route. It is likely that the volume of construction vehicles and number of construction workers will be far in excess of what is anticipated during the normal operating conditions of the REP. Although the construction phase is temporary, it could cause significant impacts to the local highway network and public transport capacities. Further work is required as part of the Transport Assessment to assess the full impact of construction on the local transport network. It is	N	<p>A full traffic and transport assessment has been undertaken of the peak Construction period (anticipated to be Month 13 of the programme) and for two scenarios (the ‘nominal’ scenario and the ‘100% by road’ reasonable worst scenario) representing possible Operational methods at REP. These are presented and appraised in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the local strategic road network during the construction and operation of the Proposed Development.</p> <p>The scope of the reports was agreed with the Local Planning Authorities;</p>

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				<p>encouraging that formal parking for construction workers is going to be minimal, but it is unclear how the 1,097 construction workers are going to travel to the site on a daily basis; further assessment of the impacts is required. The incorporation of a Construction Staff Travel Plan into the Construction Traffic Management Plan is welcomed; this should provide additional information on specific measures to restrict informal parking and encourage sustainable travel.</p> <p>The applicant should provide TfL with the UKPN assessment of the Electrical Connection Route (ECR) to understand the extent of road closures that may be required as part of this construction and the anticipated duration of these closures. As both the construction of the REP and ECR is envisaged to be undertaken simultaneously, the construction impact assessment should consider any road closures and route diversions. Depending on the scale, length of closures and construction phasing details, it may be</p>		<p>Local Highway Authorities and Highways England.</p> <p>As a method of applying a reasonable worst case scenario for the purposes of a transport impact assessment for Electrical Connection construction worker trip generation to the network, the assumption has been taken that those workers would all visit a single point along the proposed Electrical Connection route. A hypothetical position has been identified for this purpose along Bob Dunn Way close to the River Darent. In practice the movements for the Electrical Connection would be more widely distributed across the cable route depending on the location of the works at that time.</p> <p>Automated Traffic Counts were collected to form a baseline data of traffic on the local highway network. The construction effects have shown adverse driver delay effects on the A206/ A2016/ Bexley Road roundabout. Mitigation measures to reduce these effects are outlined within the outline CTMP (Appendix L of the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3)), that has been</p>

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				<p>necessary to undertake microsimulation analysis of the impacted area.</p> <p>The applicant should provide a draft Construction Logistics Plan, a Delivery and Servicing Plan and an Employee Travel Plan.</p>		<p>prepared for the Proposed Development. The CTMP would include travel planning initiatives to assist with reducing the travel impacts from construction workforce commuting. This includes limiting on-site car parking to approximately 50% of the peak number of workers (552 spaces) and seeking to structure working hours to avoid travel in the network peak period.</p> <p>The TA has assessed the impacts of the predicted peak construction period, however, management of the construction logistics will be included within the final CTMP, which would be secured as a Requirement of the DCO.</p> <p>No likely significant effects are identified, if mitigation is implemented.</p> <p>The construction works associated with the Electrical Connection would be transient and would result in delays similar to other statutory utility road works as the construction process moves along the route. The construction works would not be as extensive or as disruptive as major road works. The Electrical Connection would be constructed in sections approximately 200m in length (300m</p>

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						<p>when including traffic management areas) using single lane closures largely along the two-lane dual carriageways of the A2106/A206.</p> <p>The statutory utility company's contractor who constructs the Electrical Connection anticipates that, regardless of whether the cable is installed in the highway, verge or footway, that a single lane highway closure would normally be required to undertake their construction works. A programme and methodology for the construction of the route and options would be prepared by the Applicant and the utility company to assess the most favourable route. This would be prepared in collaboration with the Local Authorities to seek to reduce the impact of its delivery and co-ordinate with other operations, such as bus services and frontage access.</p> <p>It has been shown that the Proposed Development would not have materially significant residual impacts on the transport network either during construction or once REP would be operational. REP would be suitably located to maximise the benefits of the proximity of the River Thames and has good connectivity to the strategic road</p>

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						<p>network. Temporary impacts would be ameliorated by applying Construction Traffic Management Plans and Operational Worker Travel Plan, further reducing the impacts of the Proposed Development.</p> <p>The Operational Worker Travel Plan would detail the location, format and designation of cycle and car parking provision and set out the management processes for those spaces. The predictions of worker travel are outlined in the outline Operational Worker Travel Plan, include as Appendix M to the TA, using Census data for the local area. These predictions would be refined as part of the final Operational Worker Travel Plan.</p> <p>Qualitative reviews of the construction processes and anticipated impacts of the Electrical Connection are provided in those documents. A CTMP covering the construction of the Electrical Connection would detail the temporary traffic management measures to be used and the programme for those works. The CTMP would be agreed with the</p>

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						relevant affected Local Highway Authorities (including TfL).
	Local Council Position			It is understood that Bexley Council's response is primarily going to focus on a review of the details of the proposals, rather than the principle itself, as well as the impact of the proposal on views looking toward the river.	N	The Applicant notes this comment.
	Energy Generation			The primary energy generating element of the proposed Riverside Energy Park is the Energy Recovery Facility, an energy from waste plant which produces energy through the incineration of waste. The ERF cannot be supported as it does not contribute to the achievement of sustainable development as set out in the revised NPPF and does not accord with various NPSs. It will not contribute to the circular economy and does not support achieving high recycling rates, as set out in draft London Plan SI7, London Plan Policy 5.3 and the Mayor's London Environment Strategy (LES).	N	As noted above, a Project Benefits Report (Document Reference 7.2) has been prepared, which addresses, in detail, the comments made by the GLA. The PBR explains how the Proposed Development meets a pressing need for waste disposal in London, its role in the circular economy and, along with the Planning Statement (Document Reference 7.1), its compliance with the National Policy Statements for Energy (EN-1, EN-3 and EN-5) and its compliance with other national, regional and local planning policy. A full Carbon Intensity Floor assessment is included in the CHP Study (Document Reference 5.4). The assessment has been undertaken in accordance with GLA approved

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				<p>The applicant has not demonstrated that there is any need for the proposed facility. Further, if London is to meet its reduction and recycling targets, there will be a surplus of EfW capacity by 2030; therefore, there is no need for additional EfW plants to process London's waste.</p> <p>Whilst the development is described as 'CHP-ready' (and given the existing energy from waste facility has not yet utilised heat off-take), it is not considered that the proposed ERF could meet the Carbon Intensity Floor, as required by draft London Plan SIB and the LES. Furthermore, given that a heat off-take has not yet been established from the adjacent RRR, it is considered that there is unlikely to be any demand for the heat from the proposed facility for many years. It would, therefore, essentially be operating as an incinerator and contrary to the NPS for Energy, which requires applicants to identifying existing and future heat customers.</p>		<p>methodology and demonstrates that REP will achieve the Carbon Intensity Floor requirement set out in regional planning strategies.</p>

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				<p>The incineration of waste would have unacceptable air quality impacts on existing residents and on future residents in the London Riverside and Bexley Riverside Opportunity Areas. The anaerobic digestion facility, battery storage and PV panels are supported in principle as they allow the generation and storage of entirely renewable energy</p>		
London Assembly	Waste Management		30.07.18	<p>According to the Mayor's Environment Strategy, as London reduces waste per person and increases the separation of dry recycling and food waste, its residual waste should plateau, even as the population increases and landfill is phased out. With EfW incinerators coming on stream at Edmonton and Beddington Lane, London is to have EfW incinerator capacity equal to this residual waste stream. The need for increased capacity will primarily be in recycling, and potentially in organic treatment.</p> <p>Therefore, the anaerobic digestion (AD) element of the energy park proposal is a</p>	N	<p>The Applicant has reviewed the Mayor's Environment Strategy and incorporated the targets, along with the adopted and draft London Plans, in the various scenarios assessed for the different waste forecasts and recycling and recovery policies within London. This assessment demonstrates that REP is required to deliver sustainable waste management and net self-sufficiency within London and will help, rather than prejudice, the waste hierarchy. The assessment, which has regard to the Assembly's comments on the circular economy and recycling rates, was also carried out pursuant to paragraph 2.5.66 of NPS EN-3, is called the London Waste Strategy Assessment, and is contained in Annex A to the Project Benefits Report (Document Reference 7.2). The</p>

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				<p>positive. Adding 40,000 tonnes waste handling capacity to London’s AD infrastructure would make up some of the capacity gap expected if food waste is separated better but not reduced at source. The proposed 1.2 MW solar generation capacity would certainly be a useful contribution to London’s zero-carbon energy supply, and the proposed battery storage capacity would also be an important part of smart and renewable energy infrastructure.</p> <p>However, these elements are very small in comparison to the proposed waste incineration. We are therefore responding to this current proposal primarily as an EfW incinerator. Apart from landfill (and incineration without energy recovery, which is already near zero), EfW incineration is at the bottom of the hierarchy for London’s waste management. Reasons to avoid incineration if possible include the loss of materials in the waste stream, and the air pollution produced</p>		<p>Assessment clearly demonstrates that REP is in accordance with both the London Plan, adopted and draft, and the National Policy Statements EN-1 and EN-3.</p> <p>The Applicant notes the Assembly's support for the Anaerobic Digester plant, solar and batter storage.</p>
	Air Quality			Incineration also contributes to air pollution. In our report, we	N	Regarding Air Quality, the Applicant has carried out an environmental

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				found that London's EfW incinerators emit over 2,000 tonnes of NOx per year, 4 per cent of London's total. Many other pollutants, including chlorine, arsenic and mercury are also emitted from EfW facilities.		<p>impact assessment. The conclusions on Air Quality are contained in Chapter 7 to the Environmental Statement (Document Reference 6.1). Modelling of emissions from the Energy Recovery Facility has predicted that industry assessment thresholds (above which significant effects could occur) would not be exceeded, and there will be no significant effects on human health. In addition, emissions from the Energy Recovery Facility are not predicted to have a significant effect on ecological sites. No significant cumulative effects are predicted to arise as a result of REP in conjunction with other developments which would be under construction or operation at the same time as the Proposed Development.</p> <p>An Air Quality Technical Note was provided to the GLA and the London Assembly as part of the Applicant's ongoing consultation and is provided in Appendix J.5 of the Consultation Report (Document Reference 5.1).</p>
	Energy Generation			The energy generated by incineration is a benefit. However, the energy is not fully	N	The Applicant has carried out a detailed assessment using a range of scenarios based on the different waste

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	Waste Management			<p>renewable. Only the organic component of the waste stream qualifies as renewable fuel. As more of this is separated and sent to AD, the overall fuel mix for incineration may become less renewable.</p> <p>In conclusion, we remain wholly unconvinced with the case for greater EfW incinerator capacity at Belvedere and instead wish to see a direction of travel towards the circular economy. Madrid recently committed to stop sending waste to incineration by 2025: London is not in a position to achieve this so soon, but should be heading in a similar direction. With the Mayor's strategy (and national policy) directed at increasing recycling and taking food waste out of the residual waste stream, these should take priority over building any additional incinerator capacity.</p>		<p>forecasts and recycling and recovery polices within London. This assessment, the London Waste Strategy Assessment, is contained in Annex A to the Project Benefits Report (Document Reference 7.2). The Assessment clearly demonstrates that REP is in accordance with both the London Plan, adopted and draft, and the National Policy Statements EN-1 and EN-3 and demonstrates a clear and urgent need for REP (in terms of both waste management and energy generation).</p> <p>In addition to the Project Benefits Report, the Applicant has prepared a Planning Statement (Document Reference 7.1) which explains how the Proposed Development conforms to national, regional and local planning policy. The Applicant has had regard to the Assembly's comments on policy in assessing compliance with planning policy, with the conclusions set out in the Planning Statement accompanying the Application</p>

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Appendix J.2 – Summary of Relevant Responses from section 42 Statutory Consultation

Table 4: Responses and regard had to responses from non-prescribed consultees

Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
Bexley Natural Environment Forum	Waste Management	18.06.18	30.07.18	As regards a second incinerator, we have previously criticised this as a linear process, and nothing to do with the recycling of resources, something also stressed by the London Mayor and Assembly. According to figures quoted by Assembly member Caroline Russell (Green) in questions to the Mayor in December 2017, 70-80 per cent of London's household waste is recyclable, yet more than 50 per cent of London's waste is sent to 'Energy from Waste' incinerators. In addition, recycling rates among the Western Riverside Waste Authority boroughs (Hammersmith and Fulham, Lambeth, Wandsworth and Kensington and Chelsea) have fallen since they started their contract with the Belvedere EfW incinerator in 2012. The conclusion to be drawn is that incineration is depressing London recycling rates, and is likely to continue to suppress them into the future. The incinerator part of the 'energy park' proposal is something out of the 20th century and should be scrapped in favour of the pursuit of proper zero waste strategies	N	Despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted to landfill. REP will be a suitable alternative to help treat London's waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor's recycling aspirations. REP will also contribute towards generating low-carbon energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion, both important elements of the Circular Economy. The benefits and need associated with REP are explained fully in Document Reference 7.2 The Project and Its Benefits Report.
	Waste Management			We have not previously commented on the green/food waste digester element of this. Insofar as this material contains a high percentage of water, the carbon cost of lugging it around is exacerbated,	N	The Applicant fully appreciates the waste hierarchy and would advocate that the Anaerobic Digestion facility is used for material that cannot be avoided or reduced.

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				and as the last we heard was that it was being carted to a facility in Suffolk, a more local solution may be preferable. However, there appears to be massive scope for increasing home garden composting in Bexley based on how few compost bins can be seen from train windows in even large gardens backing onto the railway lines. Given the poor, sandy nature of much topsoil in Bexley, increasing the amount of organic matter in garden soils will improve water-holding capacity and reduce the need for watering, which becomes even more important given the fact that the GLA determined that the capital is on the verge of going into water deficit and with the possibility that the current drought-like conditions may become more frequent. Cory's documentation is not crystal clear as to whether such waste will also be brought in from outside Bexley or not.		The Anaerobic Digestion facility will treat up to c. 40,000 tonnes per annum of food and green waste This could be from both household and commercial operations (where home composting may not be appropriate). This will be a benefit to Bexley and the surrounding area, providing an in-borough solution for waste which is currently transported much further away to be processed. By providing a facility for food and green waste locally, REP will provide further environmental benefits, including: shortening the length of lorry trips collecting food and green waste therefore reducing carbon emissions.
	Site Selection Terrestrial Biodiversity			Whilst the actual construction is to be within Cory's existing site footprint, we could not find a map showing the area to be used for construction vehicles and materials. The text description is somewhat ambiguous, talking about formerly used land to the south of the existing incinerator and west of Norman Road. It should be noted that the green field between the incinerator and the	N	Areas to be used as Temporary Construction Compound, including for construction vehicles and materials storage, are shown in the Works Plans that have been prepared for the REP DCO Application (Document Reference 2.2). Potential effects to habitats and species within the Data Centre fields and the Main Construction Compound have been fully considered within Chapter 11 of the ES (Document Reference 6.1).

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				<p>Cory/Borax fields falls within the Site of Metropolitan Importance for Nature Conservation boundary, and that the Cory/Borax fields, for which outline planning permission has been granted for large data centres, has been identified as of at least regional importance for invertebrates as well as nesting by red-listed birds. We now understand that the proposed laydown areas (construction compounds) are indeed to be on the west side of Norman Road, in the open mosaic areas that were previously home to the old electric substation. This area also backs onto Norman Road Field where Kestrels breed and disturbance should be considered.</p>		
				<p>One publication states that delivery of waste will predominantly be by river, though Cory has recently been applying for increased lorry movements, whilst another document essentially says it is looking at the economics of river vz road and hasn't decided on the mix yet. BNEF is against more heavy lorry traffic in the area.</p>	<p>N</p>	<p>REP will predominantly be a river fed facility, maximising the use of the existing jetty and the Applicant's river transportation infrastructure to both bring in waste, and export ash for recycling.</p> <p>The EIA assesses a 100% transportation by road scenario. This is only because as part of the EIA, it is required to assess the 'worst case' from a road transport perspective, which would involve road usage in the event of a jetty outage.</p> <p>Where environmentally and commercially appropriate, it is expected that some waste, primarily green and food waste, will be transported to REP by road.</p>

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Appendix J.2 – Summary of Relevant Responses from section 42 Statutory Consultation

Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
	Townscape and Visual Impact			<p>Clearly there will be another large visual intrusion, blocking views out to the Thames, which Cory's own assessment accepts is of significant negative impact. The artist's impressions conveniently avoid illustrating the combined effect of these new proposals plus the four-storey data centre build already given outline permission by Bexley Council, in surrounding Crossness LNR by walls of very tall buildings on two sides. What matters to ordinary users of the area is the view from the Belvedere area of the Thames scarp slope, and ground-level from the marshes, whereas the Cory riverward view mock-up is an aerial one that minimises the apparent loss of sight of the river whilst being one that hardly anyone (other than a few helicopter pilots and passengers) will actually experience in practice. Yet more night lighting will be introduced to the marsh and both the amount, directionality and spectra of that need to be taken into account. We understand that Cory has settled on the stepped roof option for the new incinerator building, for reasons of efficiency of the rooftop solar arrays and safety of access, though this will not blend so well as the curved roof option with the existing incinerator and sewage processing facilities adjacent to this site. Bexley Natural Environment Forum repeats its suggestion that Cory should look instead to put solar on the roof of</p>	N	<p>Viewpoint 2 and Viewpoint 3 (see Appendix E.2 of the ES, Document Reference 6.3) are selected for the Townscape and Visual Impact Assessment (TVIA), in order to consider the likely visual effects of REP on people's views from the Crossness Local Nature Reserve. The TVIA considers effects on people's visual links to the river, and on the landscape character of the area which includes the Nature Reserve, (see Viewpoints 2, 3, and 4 (Appendix E.2) and also Appendix E.5 of the ES, Document Reference 6.3, in relation to the cumulative effects of the Data Centre. Section 9.10 of ES Chapter 9 has identified a significant adverse cumulative effect at these viewpoints during construction and operation.</p> <p>Lighting effects on human receptors was scoped out in the Secretary of State's Scoping Opinion. An Outline Lighting Strategy is included as Appendix K.3 to Chapter 15 of the ES (Document Reference 6.3). An assessment of lighting effects on biodiversity receptors is included in Chapter 11 of the ES (Document Reference 6.1). No likely residual significant effects were identified. The Design Principles (Document Reference 7.4) states that: "<i>DP 5.01 - Lighting will be appropriate to the local context and mitigate lighting impacts upon identified habitats, neighbouring occupiers and the wider landscape</i>"</p> <p>Accurate Visual Representations (AVRs) as wireframes have been prepared and are</p>

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				the existing incinerator, and should look at leasing local warehouse roofs for the installation of significant additional solar capacity, rather than relying on an unsustainable extra incinerator to implement this feature of the scheme.		included as part of the TVIA (see Appendix E.2). The stepped roof building form referred to in the Design Principles (Document Reference 7.4) will provide new roofline and skyline interest to the horizontal linear form and the creation of a varied and dynamic roofscape; as well as positive variation and simplicity of form. The Proposed Development comprises complementary energy generation equipment which seeks to maximise the generation of renewable energy. As RRRF is not included within the DCO Application, it is not considered appropriate to explore options for retrofitting solar panels at RRRF within the DCO. Further, the RRRF stack being located at the south end of the plant casts a shadow over the facility making it unsuited to solar generation.
	Townscape and Visual Impact Terrestrial Biodiversity			Our preferred route for the electrical cabling out to Littlebrook Power Station is the one that would avoid digging up the footpath across the LNR.	N	The Applicant acknowledges this comment. The preferred route of the Electrical Connection from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly. A final route will be selected in consultation with UKPN. The TVIA (Chapter 9 of the ES, Document Reference 6.1) assesses effects of the Electrical Connection route options during construction, including effects on PRoWs and

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
						the Local Nature Reserve (LNR) and visual effects. This has identified both adverse and beneficial likely significant effects from the construction, operation and decommissioning of REP.
	Air Quality Terrestrial Biodiversity			It is mentioned that Cory has looked at the combined air quality effects of Incinerators 1, 2 and the Thames Water Sludge facility, but it is not made plain whether or not this has been set within the context of wider London air quality data and problems. We are concerned about the deposition of nitrates etc. on the Crossness LNR and sites over the river such as at Rainham Marshes.	N	The impacts of RRRF, ERF and Crossness Sludge Powered Generator have been modelled together and the predicted concentrations added to baseline levels and loads. The results have been reported in Appendix C.2.2 of the ES (Document Reference 6.3). A full assessment of impacts from emissions, including nitrate deposition, to designated areas has been undertaken (see Chapter 7 of the ES, Document Reference 6.1). Air quality impacts associated with the operation REP are reported as not significant.
	Terrestrial Biodiversity			Cory says it believes that there will be no significant negative impacts on biodiversity from the construction, operation or decommissioning of the proposed new facilities. These are direct local effects of course. Even if this is true, we would contend that supporting a resource-wasteful economy by undermining recycling has indirect effects, and that all the while Cory occupies the current footprint, the scope to compensate for the loss of open space elsewhere on the marshes (most recently Cory's own Data Centres, and the proposed 'Innovation Centre') by restoring other areas is blocked off at this location. A lot of the larger open	N	A full ecological assessment of effects from construction and operation of the Proposed Development has been undertaken against the ecological baseline (see Chapter 11 of the ES, Document Reference 6.1).

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				spaces left in London are designated as sites of importance for wildlife and, in requiring large buildings, the pursuit of further incinerator capacity in London threatens such sites, as seen with the bitterly opposed Beddington Farmlands and Pinkham Way incinerators.		
	Waste Management			<p>Conditions were this scheme to be approved in whole or part:</p> <ul style="list-style-type: none"> • Living roofs where possible • Compensation instead of, or as well as 'mitigation'. That is, the return of an equivalent area from concrete to nature, rather than the constant diminution of wildlife areas and de facto policy of allegedly protecting and enhancing it by cramming it into ever less space. Can Cory buy, and return to nature, any lay-down area on Norman Road that has not yet been given permission for building on? • Tight limits to be put on the amount of lorry traffic bringing waste to the overall facility (including the existing incinerator) • Cory to provide funding for schemes to increase home composting and recycling in Bexley • Cory to fund schemes to increase recycling rates in the 	N	<p>There will be significant benefits for the local community through Cory's investment as described in the Project Benefits Report (Document 7.2) and Socio Economic (Chapter 14 Document Reference 6.1) and Cory has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley. Any requirements imposed on the project will need to be justified in line with paragraph 4.1.7 of the Overarching National Policy Statement for Energy (EN-1) that states that requirements must only be imposed where necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments. Opportunities for appropriate enhancement in and around the development will be sought.</p> <p>Also an Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document</p>

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				<p>west London Boroughs that send waste to the existing Belvedere incinerator</p> <ul style="list-style-type: none"> • Cory to contribute to waste minimisation schemes, particularly research to find environmentally friendly substitutes for materials that commonly go for incineration • Cory to help initiate projects to increase the availability of recycled products in Bexley 		Reference 7.6) has been produced and accompanies the REP DCO application. The outline BLMS includes all ecological mitigation measures and opportunities to provide enhancements.

Table 5: Responses and regard had to responses from section 42(1)(d) land interests

Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
Edwards Duthie c/o Seamus Gannon	Land	21.06.18	30.07.18	We act on behalf of Mr Gannon and attach herewith a copy of the Land Registry plan showing an area that he owns at Norman Road edged red together with edged green details of an area he has sold off but we are still very	N	The Applicant has engaged in negotiations with representatives acting on behalf of Mr Gannon. A record of engagement with land interests is set out within the Statement of Reasons (Document Reference 4.1).

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				much in contact with the new owners. We would be greatly obliged if you could explain to us to what extent the land that our client owns and the green land will be affected by any possible development including whether or not our clients land and the green land may be subject to an application for a Compulsory Purchase Order. We are already in contractual negotiations with Corys to lease them a part of our clients land and would hope on this basis that you would be able to confirm that no part of our clients land will need to be compulsory required.		
Western Riverside Waste Authority	Land	13.06.18	30.07.18	Writing to object not to the concept of the Riverside Energy Park but in relation to the proposed award to the Applicant of compulsory purchase powers to take land/land rights from its fellow group company Riverside Resources Recovery Limited (RRRL)	N	The Applicant has engaged with WRWA and continues to work towards commercial agreements. The Applicant welcomes the WRWA's comment that it hopes that a mutually acceptable negotiated accommodation can be made. However, it is the Applicant's position that should agreement not be reached, then compulsory acquisition powers are necessary. This Application does not frustrate RRRL or the RRRF. Indeed, Protective Provisions for the protection of RRRL have been included in the draft DCO (Document Reference 3.1) at Schedule 10.
	Waste Management			The Authority is both the lender and owner of last resort of RRRL under the terms of a highly complex public private partnership arrangement, pursuant to which RRRL has afforded security rights over its land to the Authority and has to make available such land (including that part of RRRL's land sought to be used by the Applicant) to the Authority in certain pre-defined circumstances.		
	Waste Management			It is our view that the Applicant should not be permitted to frustrate these		

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				arrangements on any basis other than on terms freely agreed with the Authority, especially as these arrangements were entered into by an associated company to the Applicant to enable the development of the existing energy from waste facility. The issues involved do not resolve solely around monetary compensation but include maintaining the security of the disposal route for the general waste generated by the Authority's constituent councils.		
	Waste Management			As such, the Applicant should not be awarded compulsory purchase powers over RRRL's land. The Authority does however hope that a mutually acceptable negotiated accommodation can be made with the Applicant and will endeavour to reach such a settlement in due course.		
Vodafone	Utilities	13.06.18	30.07.18	We confirm that Vodafone has apparatus in the area and advises that we have a qualified objection to the order unless you, or your applicant, provides WS Atkins with written assurances, quoting our reference above, as to the safeguarding of Vodafone apparatus and the reimbursement of costs for any works necessary.	N	Protective Provisions for the protection of operators of communication code networks have been included in the draft DCO (Document Reference 3.1) at Schedule 10. The Applicant has engaged with all statutory undertakers potentially affected by the Applicant, providing a copy of the proposed protective provisions and asking for their comments.
	Utilities			Where Vodafone's apparatus is to remain in the stopped-up area we shall also require an undertaking that the applicant will grant a wayleave agreement to Vodafone on terms and		

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
	Utilities			<p>conditions acceptable to Vodafone and the reimbursement of our (WS Atkins') costs associated with the negotiation of the said wayleave. A copy of Vodafone's standard stopping-up wayleave proforma is available on request.</p> <p>A copy of the Vodafone process 4461 'Special Requirements relating to the external plant network of Vodafone' is available on request. The process provides guidance on working in the vicinity of Vodafone's apparatus.</p>		
Knights Solicitors c/o S.Wernick and Sons (Holdings) Limited and Others	Land	13.06.2018	30.07.2018	<p>S. Wernick & Sons (Holdings) Limited owns the freehold of approximately 1.2 acres (the property) identified in the consultation documentation as being used for the development of the proposed Riverside Energy Park (the scheme) by Cory Environmental Limited (the applicant). The property is shown outlined in red on the plan at Appendix 1.</p> <p>The property is occupied as a depot by Wernick Event Hire Ltd as the operational site for 'Wernick Events', providing temporary events infrastructure (portable cabins as sleeping accommodation, toilets and showers, disabled units, ticket booths and gatehouses). This depot is a supplier for a significant number of very high profile events in London and the</p>	N	<p>The Applicant has engaged in negotiations with representatives acting on behalf of S Wernick and Sons (Holdings) Limited. A record of engagement with land interests is set out within the Statement of Reasons (Document Reference 4.1).</p> <p>An Environmental Impact Assessment has been undertaken to understand the potential effects of the Proposed Development (Document Reference 6.1). With respect to both Historic Environment and Terrestrial Biodiversity, no likely significant residual effects have been identified.</p>

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				<p>South East {for example the London Marathon and Chelsea Flower Show), some of which are set-out at Appendix 2.</p> <p>The property comprises a yard of secure hardstanding with workshop and offices. Its location is business critical; accessible to both Central London but also to the M25. There are 6 full time staff based at the property.</p> <p>....</p> <p>Based on the above my client companies are strongly opposed to the Scheme and the threat of the use of compulsory purchase powers implied by the inclusion of the property therein, which it is considered will have a significant adverse impact.</p> <p>My client companies also have concerns about the Scheme in particular focused on its sustainability, practicality and the environmental and other impacts that the Scheme will have in an area where there is some environmental, archaeological and scientific interest even though the land is in an area which includes long established industrial and commercial elements.</p> <p>Although my client companies' principal concern is with the freehold that they currently own and occupy and with the busy business that Wernick Event Hire runs from the site, they are also</p>		

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				concerned about the establishment of the Electrical Connection running underground to the Electrical Connection Point at Littlebrook. The Electrical Connection needs to be established with great care to ensure that ecological, scientific and archaeological features are clearly identified and either left undisturbed or are disturbed as little as possible.		
Knights Solicitors c/o SAS Depot Limited	Land	28.06.2018	30.07.2018	We enclose a copy of our Mr Knight's letter of even date to Mr Scanlon of Peter Brett Associates LLP and Appendix 1 thereto being the Consultation Response on behalf of SAS Depot Ltd. Please acknowledge receipt and confirm that this Consultation Response has been received in advance of the 17:00 deadline on Monday 30 July 2018.	N	The Applicant has engaged in negotiations with representatives acting on behalf of SAS Depot Limited. A record of engagement with land interests is set out within the Statement of Reasons (Document Reference 4.1).
Spring Law c/o Creekside Developments (Kent) Limited	Land	13.06.2018	30.07.2018	We and Creek have both been served with correspondence as a statutory consultee for the purposes of section 42 of the Planning Act 2008 and regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and served with a notice pursuant to section 48 of the Planning Act 2008. We have previously been in direct correspondence and enquiries with various representatives and persons acting for Cory Environmental Holdings Limited ("Cory") in connection with the proposed development of Riverside	N	The Applicant has engaged in negotiations with representatives acting on behalf of Creekside Developments Limited. A record of engagement with land interests is set out within the Statement of Reasons (Document Reference 4.1).

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Consultee	Consultation Topics	Date consulted	Response deadline	Summary of response	Change Y/N?	Regard had to response (s49)
				<p>Energy Park (“Proposed Development”) - Please refer to the various emails further below from 18 June 2018 to 19 July 2018. Creek is concerned to obtain clear confirmation about how the Proposed Development would affect the land our client is buying in any way and the services and access to it and whether compulsory acquisition and/or development rights would apply.</p>		

**Appendix J.3 Minor Refinements Consultation
Comments and Applicant's
Responses**

Minor Refinements Consultation

The tables below set out relevant responses received as part of the Minor Refinements Consultation (see Section 8 of the Consultation Report).

Table 1 provides relevant responses received from section 42(1)(d) parties (see Section 8.3 of the Consultation Report). Table 2 below provides a relevant response received from section 42(1)(a), (aa), (b) and (c) parties consulted (on a non-statutory basis) as part of the Minor Refinements Consultation (see Section 8.4 of the Consultation Report). Table 3 provides a relevant response received from the local community in response to the non-statutory engagement on the minor refinements (see Section 8.4 of the Consultation Report).

Table 1 – Relevant responses received from section 42(1)(d) parties

Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to response (s49)
Arriva UK Bus Limited	Transport	16/08/2018	14/09/2018	Arriva London operates bus routes under contract to TfL who are the transport authority within London. We are responsible for the day to day operation of bus services and ensuring they run reliably within TfL performance criteria. Failure for Arriva London to meet performance criteria set by TfL will result in significant cost penalties.	N/A	The Applicant has noted this response. Potential effects of the Proposed Development on Arriva services is considered in the responses below.
	Transport	16/08/2018	14/09/2018	We have reviewed the TfL routes that we are responsible for operating in the Dartford area and which will be affected by the development proposals. These routes are routes 99, 229, 401, 428, 469 and B12 and total 67 buses, or just over 50% of our fleet located at Dartford.		
	Transport	16/08/2018	14/09/2018	We have major concerns about the development, in particular the highway and cable laying works between Belvedere and Dartford. We believe the proposed works will cause severe	N	A Transport Assessment has been undertaken and is presented in Chapter 6 of the Environmental Statement (ES) (Document Reference 6.1), as well as the

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Appendix J.3 – Summary of Relevant Responses from section 42 Minor Refinements consultation

Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to response (s49)
				<p>traffic disruption along the highway network and the surrounding area where the above routes operate. Without traffic modelling nor understanding your proposed phasing of temporary traffic management, it is difficult to fully understand the delays that will be caused. We have therefore considered two separate scenarios, 10 minute and 20 minute delays for the above routes.</p>		<p>Transport Assessment (TA) (Appendix B of the ES, Document Reference 6.3). These assessments fully describe the potential likely significant effects on the local road network during construction of the Proposed Development, and include the outcomes of traffic surveys and modelling undertaken by the Applicant. The assessment concludes that, following the implementation of appropriate mitigation included in the Outline Construction Traffic Management Plan (CTMP) (Appendix K of the TA (Document Reference 6.3)), the residual impacts are considered to be Minor adverse or Negligible, and therefore not significant in EIA terms. Any delays at a given location will be temporary.</p>
	Transport	16/08/2018	14/09/2018	<p>In partnership with TfL, Arriva London will be seeking payment of any costs associated with the development disruption from the developer.</p> <p>For a 10 minute delay, Arriva London will need an additional 6 buses to maintain the current level of operating service at a cost of £1.7M pa. Loss of ticket revenue for TfL associated with the fall in patronage due to the disruption has additionally been estimated at £0.34M pa.</p>	N	<p>The Applicant acknowledges this comment however considers it to be a contractual matter between Transport for London (TfL) and Arriva UK Bus Limited.</p> <p>Potential driver delay from the construction of the Proposed Development will be minimised as far as practicable by appropriate mitigation measures as set out in the Outline CTMP (Appendix K of the TA (Document Reference 6.3)) and</p>

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Appendix J.3 – Summary of Relevant Responses from section 42 Minor Refinements consultation

Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to response (s49)
				For a 20 minute delay, Arriva London will need 12 extra buses resulting in an associated operating cost of £3.2M pa. Loss of revenue for TfL associated with the fall in patronage has additionally been estimated at £0.93M pa.		will be typical of highway works that occur on an ordinary basis under the New Roads and Street Works Act 1991. Following the implementation of appropriate mitigation included in the Outline CTMP (Appendix K of the TA (Document Reference 6.3)), the residual impacts are considered to be Minor adverse or Negligible , and therefore not significant in EIA terms. Any delays at a given location will be temporary.
	Transport	16/08/2018	14/09/2018	<p>We can only comment on Arriva London routes but we are aware there will be routes operated by other companies which will also be impacted by the proposed works.</p> <p>We believe that TfL will also be responding to this consultation. Arriva London urge you to engage with both ourselves and TfL in more detail to discuss the impact of these works to minimise disruption.</p>	N/A	TfL, Highways England and the relevant highways authorities have been consulted on the Proposed Development, and in particular on matters relating to potential effects on the local transport network. The Applicant has had regard to relevant responses from all consultees and these are summarised in Appendix J of the Consultation Report (Document Reference 5.1).
Renew Civil Engineering Limited	Land Interests	31/07/2018	07/09/2018	As far as we are aware, our subsidiary has no interest in land at that location.	N/A	The Applicant has noted this response, and Renew Civil Engineering Limited have been removed from the Book of Reference (Document Reference 4.3).
Ingrebourne Valley Limited	Land Interests	31/07/2018	07/09/2018	The application boundary of your project intercepts the southern area of one of Ingrebourne Valley Limited's sites. The	Y	The final route of the Electrical Connection route in this area is not yet confirmed, however it is most

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to response (s49)
	Land Interests	31/07/2018	07/09/2018	<p>site that will be affected by your proposal is called Joyce Green Quarry.</p> <p>As shown by the location plan (Plan No. 1428/S/L), Joyce Green is located off Joyce Green Lane and borders Bob Dunn Way. The site has many permissions associated with it, please see a list of works permitted to be undertaken at the site below:</p> <ul style="list-style-type: none"> Extraction of gravel and restoration to conservation lake (Reference: DA/00/326(KCC/AS/0320/2011)) - permitted with conditions <p>The erection of a processing plant, the construction of water management ponds and ancillary buildings (weighbridge, office, messroom, stores) (Reference: DA/17/208 1 (KCC/DA/0321/2017)) - permitted with conditions.</p>		<p>likely that a trenchless installation technique will be used on the north side of Bob Dunn Way. The Applicant continues to explore possible alternative options either within the existing highway or to the south of Bob Dunn Way.</p> <p>Where possible, works affecting the reptile receptor site will be avoided. If works in the receptor site are necessary during installation, a package of mitigation will be provided in the Biodiversity and Landscape Mitigation Strategy. Details are included in the Outline Biodiversity and Landscape Mitigation Strategy (BLMS) (Document Reference 7.6 which states: "Displacement of reptiles from areas of suitable habitat that would be lost or subject to significant disturbance during development. To be undertaken under a detailed method statement, which will detail methods of site clearance to ensure impacts to reptiles are avoided."</p> <p>The Applicant will also seek to obtain protected species licenses from Natural England, as necessary.</p> <p>The Applicant met with Ingrebourne Valley Limited on 31st October 2018 to discuss the comments raised in</p>
	Terrestrial Biodiversity	31/07/2018	07/09/2018	<p>In order to undertake the works agreed by the permissions, various surveys were conducted to determine the baseline data of the site. The Ecology surveys showed that Joyce Green Quarry is home to various species of reptile and a vast number of water voles. As such, Ingrebourne Valley Limited is required to undertake mitigation measures to ensure the species are protected throughout the development of site.</p>		
	Terrestrial Biodiversity	31/07/2018	07/09/2018	<p>The mitigation strategy for the site includes the construction of receptor</p>		

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				sites for both water voles and reptiles. These receptor sites have been built and are currently acclimatising to the surrounding area, the translocation of these species is planned to commence in Spring 2019, therefore it is vital that these permitted areas are not disturbed. Please refer to the attached 'Water Vole and Reptile Fencing plan'.		their consultation response. The Applicant and Ingrebourne Valley Limited will continue to engage and have agreed to work together to reach a solution that would minimise impact on the permitted reptile receptor area located south of Joyce Green Quarry and, Ingrebourne Valley Limited's operations, whilst preserving the Applicant's ability to deliver the Electrical Connection through the land, if required. The two parties have agreed to progress a Statement of Common Ground which is anticipated to be submitted at the start of the DCO examination.
	Terrestrial Biodiversity	31/07/2018	07/09/2018	The location of the receptor areas is shown on the Water Vole and Reptile Fencing plan. These areas at Joyce Green Quarry have been designated by a professional ecologist as areas suitable for the species receptor areas. The red boundary on the Water Vole and Reptile Fencing plan represents the receptor areas for reptiles and the green boundary shows the receptor areas for the water voles.		
	Terrestrial Biodiversity	31/07/2018	07/09/2018	When the Water Vole and Reptile Fencing plan is compared with the Riverside Energy Parks boundary plan, there is a clear extension of the Riverside Energy Parks boundary that intercepts the southern area of Joyce Green Quarry. This 'crossover area' has been designated as a supplementary area (labelled as A6 on Riverside Energy Parks boundary plan) by Cory Riverside Energy. This supplementary area intersects the permitted reptile receptor area located to the south east		

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to response (s49)
				of Joyce Green. This receptor site is currently in place and is being used. The area has been approved by Kent County Council, Natural England and the Environment Agency.		
	Terrestrial Biodiversity	31/07/2018	07/09/2018	Therefore, this area must not be disturbed. It is for the aforementioned reasons that Ingrebourne Valley will be objecting to the use of the south of Joyce Green Quarry as a supplementary area (Area A6).		

Table 2 – Relevant responses received from section 42(1)(a), (aa), (b) and (c) parties consulted (on a non-statutory basis) as part of the Minor Refinements Consultation

Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
Medway Council	No additional comments to previous section 42 consultation	01/08/2018	07/09/2018	I refer to your letter of consultation regarding the above and would inform you that the Council RAISES NO OBJECTION to it. Your attention is drawn to the following informative(s) :- 1 This response is based on the letter from Peter Brett Associates, the Supplementary Preliminary Environmental Information Report (PEIR) (dated July 2018) and drawing received on 1 August 2018.	N	The Applicant has noted this comment.
London Fire Brigade	Health & Safety	01/08/2018	07/09/2018	An undertaking should be given that, access for fire appliances as required by part 5 of the current Building Regulations	N	The Applicant has noted this comment. The Application is not yet at detailed design stage however the

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				Approved Document B and adequate water supplies for fire fighting purposes, will be provided. This is without prejudice to any requirements or recommendations that may be made by the Authority under the Regulatory Reform (Fire Safety) Order 2005/Petroleum (Consolidation) Act 1928, the local authority or the Health and Safety Executive		Design and Access Statement (Document Reference 7.3) provides information of the current design parameters.
Network Rail	Land Interests	01/08/2018	07/09/2018	As you will be aware, Network Rail is a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests, will need to be carefully considered.	N	The Applicant and UKPN would engage with Network Rail on the detailed proposals during the refinement of the programme for construction of the Electrical Connection.
	Permits and Consent			Network Rail has been reviewing the information to date and at this stage it is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme.		The Electrical Connection options under review include 5 interfaces with Network Rail's interests: <ul style="list-style-type: none"> ■ Queens Road ■ Moat Lane-Whitehall Lane ■ Northend Road ■ Howbury Lane ■ Thames Road The engagement process with Network Rail would be secured as part of the DCO. Protective Provisions for the benefit of Network Rail are included in the DCO and have been
				Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes.	N	

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
	Health & Safety			In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserve the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land are available.	N	provided to Network Rail on 31 st October 2018.
	Permits and Consent			In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations and further the necessary associated easements and Clearances. We have standard protective provisions which will need to be included in the DCO as a minimum. Please contact me to obtain a copy of the relevant wording, in addition, other agreements will need to be entered into with Network Rail. A number of legal and commercial agreements will need to be entered into, for example, asset protections agreements, method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. This list is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties.	N	

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
	Health & Safety			<p>Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of, or encroaching upon Network Rail’s adjacent land. In addition security of the railway boundary will require to be maintained at all times.</p> <p>In any event you must contact Network Rail’s Asset Protection Engineers as soon as possible in relation to this scheme on the following e-mail address AssetProtectionkent@networkrail.co.uk You should submit for NR acceptance design and construction methodology for any structural works which could impact on the railway infrastructure.</p>	N	
	Permits and Consent Transport			<p>Network Rail is prepared to discuss the inclusion of Network Rail land or rights over land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms having been agreed between the parties and approved by Network Rail’s board.</p>	N	
	Planning and Consultation			<p>Network Rail also reserves the right to make additional comments once we have evaluated the proposals in more detail as we will require the comments of industry stakeholders and our lessees. It should be noted that this will also be subject to the</p>	N	

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				necessary clearances, industry notifications, being in place.		
Environment Agency	Hydrology	03/08/2018	07/09/2018	We have reviewed the revised Floor Level Strategy and support the approach to set most of the finished floor level of the new developed area above the modelled breach level.	N	The Applicant welcomes these supportive comments.
	Hydrology			We have reviewed the Flood Defence Condition Survey Specification Report and agree with the scope and specifications of this report. We confirm that we accept the landward extent of the tie bar and anchorage plate arrangement being identified as the landward extent of the flood defences.	N	The Applicant welcomes these supportive comments and notes the comment regarding future consultation.
	Hydrology Permits and Consent			We would recommend that the results of the survey are submitted to us for review once completed so that we can comment on the conclusions and recommendations (replacement, remedial and maintenance works).	N	The Applicant notes this comment regarding future consultation
				We have not reviewed the Drainage Design Strategy as the issues related to our remit will be covered under the Environmental Permit. We understand that you have submitted a request for an Enhanced Pre-Application service. We recommend that you submit the drainage strategy to our National Permitting Service as part of this consultation. We understand that you have undertaken	N	

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				consultation of this document with the London Borough of Bexley Drainage Team as the Lead Local Flood Authority.		
Highways England	No additional comments to previous section 42 consultation	01/08/2018	07/09/2018	Thank you for your email of 1 August concerning the minor changes made to the proposals. We have looked at the supplementary information and the changes to the indicative application boundary, all the additional land take involves land outside of the Strategic Road Network and therefore we have no further comment to make on the proposals at this time.	N	The Applicant notes this comment.
Kent County Council	No additional comments to previous section 42 consultation	01/08/2018	07/09/2018	KCC has no further comments to make on the Preliminary Environmental Information Report (PEIR) or the Supplementary Information to the PEIR. For reference, I attach the original KCC response to the Section 42 Consultation and all comments remain valid. KCC would welcome continued engagement with the applicant as the DCO application progresses.	N	The Applicant notes this comment. The Applicant has been in consultation with KCC throughout the assessment and development of the Application and will continue to engage with KCC post-submission.
London Borough of Bexley	Terrestrial Biodiversity	14/08/2018	14/09/2018	The report concludes that the changes, at this stage, are anticipated to result in new significant effects for Terrestrial Biodiversity or Ground Conditions. However, the preliminary findings of the assessments for these topics are subject to further investigation and assessment work which will be presented in the ES.	N	As the design of the Proposed Development evolved, new potential impacts have been identified, however, with embedded mitigation impacts relating to Terrestrial Ecology range are negligible to minor adverse, as set out in Chapter 11 of the ES (Document Reference 6.1), submitted with the DCO Application.

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
						<p>No likely significant residual effects are identified.</p> <p>In addition, with the implementation the Outline Remedial Strategy (ORS), major and moderate adverse impacts to Ground Conditions are assessed further assessed as Negligible. This is set out in Chapter 13 of the ES (Document Reference 6.1), submitted with the DCO Application.</p>
	Terrestrial Biodiversity			<p>The adjusted boundary effects potentially sensitive ecological areas, including SINC and areas not designated as SINC but with ecological potential, including areas that may be used by birds, bats, water voles and other protected species and habitats. The EIA process will incorporate Ecological Impact Assessment which will assess the impact.</p>	N	<p>Impacts relating to the SINC or areas not designated as SINC but with ecological potential, including area that maybe be used by birds, bats, water voles and other protected species are assessed as Negligible with the embedded mitigation implemented in the Chapter 11 of the ES (Document Reference 6.1), submitted with the DCO Application. No likely significant residual effects are identified.</p>
	Terrestrial Biodiversity			<p>The applicant should consider the mitigation hierarchy when considering development, i.e. avoid impact on SINC and ecological features, where development cannot be avoided, mitigate and minimise impact through design; and, where negative effects are still present, as a last resort compensation; in addition,</p>	N	<p>The principles of the mitigation hierarchy have been adopted and used when developing measures to address impacts on ecological receptors.</p> <p>Embedded mitigation measures set out in Chapter 11 of the ES</p>

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				enhancements to support net gains for biodiversity as required by planning policy including the NPPF. This will be informed by the EIA process.		(Document Reference 6.1), submitted with the DCO Application, include, but not limited to, an OBLMS (Document reference 7.6) which sets out the principles of all measures to minimise impacts to designated areas, habitats and protected species. This includes consideration of noise, lighting, and pollutant impacts, as a result of spillages or leaks from equipment during construction and decommissioning. A Final BLMS will be secured through a DCO Requirement, which will be substantially in accordance with the OBLMS. Implementation of the OBLMS result in negligible impacts to Terrestrial Biodiversity.
	Terrestrial Biodiversity			The Council will consider whether the applicant has adequately addressed the mitigation hierarchy when considering the proposed scheme. The London Plan has a policy relating to the mitigation hierarchy, which will be considered.	N	The OBLMS (Document Reference 7.6) states that <i>“the principles of the mitigation hierarchy have been adopted and used when developing measures to address impacts on biodiversity receptors. The principles of the mitigation hierarchy are that in order of preference impacts on biodiversity should be subject to avoidance, mitigation, and compensation. Where possible effects from REP have been avoided or mitigated.”</i>

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
	Planning and Consultation			The applicant has completed an extensive assessment of the potential impact on heritage assets. In line with NPPF paragraph 189, the assessment has described the significance of the assets and considered the impact of the proposal on those assets.	N	The Applicant has completed an extensive assessment of the potential impact on heritage assets (Chapter 10 of the ES, Document Reference 6.1). In line with NPPF paragraph 189, the assessment has described the significance of the assets and considered the impact of the proposal on those assets. Where a designated heritage asset has been excluded, a clear justification is provided, for example if the asset is sufficiently far away, and well screened from the study area.
				The conclusions in the report are that the potential for new, not significant adverse effects have been identified in relation to the Historic Environment where the changes impact areas in addition to those considered within the PEIR.	N	As the design of the Proposed Development evolved, new impacts have been identified, however, with mitigation, impacts range from negligible and not significant to minor adverse in the construction and operational phase of the Proposed Development. This is set out in Chapter 10 of the ES (Document Reference 6.1), submitted with the DCO Application.
	Historic Environment			It is noted that the list of designated assets in Table 10.5 of the PEIR identifies a number of assets in LB Havering. Has LB Havering been notified and consulted?	N	The Applicant can confirm that the LB Havering were consulted under section 42 of the Planning Act 2008.
	Historic Environment			There are two heritage assets in LB Bexley, which would be the main concern	N	It is recognised that the Proposed Development includes construction of

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				in the consideration of these proposals: Crossness and Lesnes Abbey.		<p>tall blocks and an increase in crane and construction activity, however, the effect is temporary and Negligible - Minor (not significant) for both Crossness Conservation Area and Lesnes Abbey.</p> <p>In heritage terms, the Proposed Development does not make a significant contribution to the experience of Lesnes Abbey. Therefore, the indirect effect is considered Minor (not significant), as the core heritage significance of the asset is unaffected.</p> <p>For Crossness Conservation Area, due to the distances involved, the significance of these assets, the effect is Negligible (not significant).</p>
	Historic Environment Townscape and Visual Impact Assessment			Crossness is a conservation area and contains the Grade I Pumping House as well as a collection of Grade II listed structures. It is located approx. 0.65km west from the application site. Appendix E3 of the Supplementary Information to the PEIR considers the impact on the assets, and rightly notes that the impact is on their setting, in the sense that the proposal will be partially visible in the distance when the assets are viewed from the west. The introduction of the new development into this view is unlikely to	N	It is noted that the response considers it to be <i>'highly unlikely that the Proposed Development will have anything more than a minimal intrusion into the setting of the heritage asset, nor will it have any more than a minimal impact on views from the asset itself'</i> .

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				<p>have a significantly harmful impact for the following reasons:</p> <ul style="list-style-type: none"> The intrusion is likely to be highly minimal (this is based on accepting the assessments found in Tables 9.14 and 9.15 of the PEIR which assessed townscape and visual effects); and The setting of Crossness is already highly industrial and includes a number of modern industrial buildings, including even on the TW site itself immediately to the south of the conservation area. 		
	Historic Environment			<p>Lesnes Abbey is Grade II listed ruins which are designated as a Scheduled Ancient Monument. It is located approx. 1.5-2km southwest of the application site. The applicant has not provided an assessment with such a detailed level of consideration as that given to the impact on Crossness, however, given the distances involved and the existence of intervening structures, it is highly unlikely that the proposed development will have anything more than a minimal intrusion into the setting of the heritage asset, nor will it have any more than a minimal impact on views from the asset itself.</p>	N	<p>It is noted that the response considers it to be <i>'highly unlikely that the proposed development will have anything more than a minimal intrusion into the setting of the heritage asset, nor will it have any more than a minimal impact on views from the asset itself.'</i></p>
	Historic Environment			<p>The site is within an Area of High Archaeological Potential. The applicant has provided an archaeological desk-based assessment (Appendix F.2) which</p>	N	<p>Consultation with Historic England regarding the Written Scheme of Investigation (WSI), relevant</p>

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				found that the proposed works include intrusive ground works which could have a significant impact on the local archaeology. To ensure that archaeology is protected and that where it cannot be retained in situ it will be recorded, the applicant produced a Written Scheme of Investigation (WSI) (Appendix F.3). You should engage with Historic England on the WSI and any relevant background information.		background information and future works has been undertaken
	Permits and Consent			The submitted supplementary information includes minor changes to the previous indicative application boundary. These specifically relate to the electrical connection route and comprise additional land labelled as 'A' on the drawings. The extent of some of these additional areas fall outside of the adopted highway and the applicant will need to contact the individual landowners involved and arrange appropriate easements for the apparatus.	N	Noted. The Applicant would negotiate suitable easements as required.
				There are also some minor extensions to the previous indicative boundary marked as 'B' areas. These areas all lie within the adopted highway.	N	
	Transport			The Highway Authority raises no objections to the proposed amended indicative application boundary.	N	The Applicant has noted this comment.
	Transport			The use of council bridges and footbridges etc is allowable but the methods to be	N	On behalf of the Applicant, UKPN is liaising with relevant authorities to

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				used will be dealt with on an individual structure by structure basis and a charge will be required for the council and its consultant to provide recourses to assess and approve each situation.		obtain structural details that will inform ongoing Electrical Connection engineering investigations. The use of any bridges would be subject to the council agreeing the detailed methodology.
Ministry of Defence DVOF	No Comment	02/08/2018	07/09/2018	Thank you for your email , I'm afraid we cannot comment on your Application for Development Consent. We simple map obstructions and do not have the such responsibilities as planning consent.	N	The Applicant has noted this comment.
National Grid	Permits and Consent	01/08/2018	07/09/2018	As you are aware from our response dated 26th July 2018, appropriate protection will be required for the retained NGET infrastructure apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.	N	Protective Provisions for the protection of electricity, gas, water and sewerage undertakers have been included in the draft DCO (Document Reference 3.1) at Schedule 10. The Applicant has engaged with all statutory undertakers potentially affected by the Applicant, providing a copy of the proposed protective provisions and asking for their comments.
	Electrical Connection			In response to the Supplementary Areas shown on the plan attached to the letter dated 31st July 2018, NGET apparatus is located close to the area shown on the insets A5 and A6. I attach a plan to show the location of the VN (275kV) overhead line route and associated apparatus within these two areas	N	
	Health & Safety Permits and Consent			Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGET's apparatus, we will require appropriate protection and further	N	

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				discussion on the impact to its apparatus and rights.		
	Permit and Consents			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.	N	
	Health & Safety			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).	N	
	Health & Safety			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.	N	
	Health & Safety			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	N	

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				should make sure that they are both aware of and understand this guidance.		
	Health & Safety			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.	N	
	Health & Safety Design			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.	Y	
	Health & Safety			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.	N	
	Permits and Consent			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	N	

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Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to Response (s49)
				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.		
	Electrical Connection			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	N	
Public Health England	No additional comments to previous section 42 consultation	01/08/2018	07/09/2018	Thank you for your consultation letter regarding supplementary information to the preliminary environmental information report for the above development. We have reviewed the documentation and can confirm that we have no further comments.	N	The Applicant has noted this comment.
Royal Borough of Greenwich	No additional comments to previous section 42 consultation	01/08/2018	07/09/2018	The Royal Borough of Greenwich refers the applicant to the Council's previous comments on the Preliminary Environmental Information Report dated 26th July 2018 (Ref: 18/2035/K).	N	The Applicant has noted this comment.

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Table 3 – Relevant response received from the local community in response to the non-statutory engagement on the minor refinements

Consultee	Consultation Theme	Date Consulted	Response Deadline	Summary of Response	Change Y/N?	Regard had to response (s49)
Local Community	Terrestrial Biodiversity	01/08/2018	07/09/2018	<p>Hello, I am responding to your letter dated 30 July 2018 regarding the Supplementary Information Report. I live around 150 metres from the southernmost end of Norman Road (North) and around 500 metres from the existing incinerator (and proposed new one). I have already provided two responses to your initial consultations.</p> <p>I am shocked that Change reference A2 appears to be at the very entrance to Crossness Nature Reserve, an entrance I use frequently and which is currently a very pleasant way to enter the reserve. You have not even referred to this fact in your literature, let alone make it clear to anyone who wishes to make an informed response. I only know because I visit the Reserve regularly. Anyone who did not or was indifferent (which I reasonably assume to be the vast majority of the public being consulted under this exercise) would not even realise the significance of its location. Indeed, even the plan provided does not label Crossness Nature Reserve.</p> <p>You have not provided any information on what these new changes will entail in terms of disturbance, timeframe or changes to the existing entrance - a</p>	N	<p>The preferred route of the Electrical Connection is from the REP site is down Norman Road. However, if the route down Norman Route is not determined feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly.</p> <p>Chapter 11 of the ES (Document Reference 6.1) details the assessment of likely significant effects on terrestrial biodiversity, and mitigation measures that will be employed to minimise impacts on Crossness Local Nature Reserve (LNR). No likely significant residual effects have been identified.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN’s statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as</p>

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Appendix J.3 – Summary of Relevant Responses from section 42 Minor Refinements consultation

			<p>pretty shocking omission give that the changes under A2 are being undertaken at the very entrance of a Local Nature Reserve designated Metropolitan Open Land which, I understand, is offered the highest possible protection by the GLA comparable to that afforded the Green Belt.</p> <p>Therefore I would be extremely grateful if you could provide more information on what exactly the works under A2 (and A1) would entail if undertaken. I understand that they relate to cabling, but not being an expert on major electric cabling projects for incinerators or the environmental impact of “Horizontal Direct Drilling” it is very difficult for me make an informed response.</p> <p>Whatever the actual work entails, I would like to express my strong opposition to yet another encroachment on Crossness Nature Reserve. I am extremely concerned that the works will lead to the closure (even temporary) and/or significant changes to the existing entrance. I am even more worried that it will involve the erection of buildings (whether temporary or permanent) such as substations - particularly as you are already in the process of gaining approval for the construction of four storey data centres on Cory/Borax Fields which, boundaries and legislative designation aside, are essentially part of the Reserve. The disturbance to users of the Reserve and wildlife is self-evident, and the fact that it</p>	<p>the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
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Appendix J.3 – Summary of Relevant Responses from section 42 Minor Refinements consultation

				<p>would take place at such a crucial location as the very entrance to the Reserve itself is frankly staggering. The Changes under A1 are also of great concern and appear to also be on Cory/Borax fields or areas very close by. Your description of these is bizarre as you seem to place more priority on the fact that you are avoiding the “existing highway” rather than noting the fact they would be undertaken in an area which is essentially part of the Reserve, an area known to be a breeding ground for skylarks, and one populated by one of the Britain's rarest and most threatened mammals (the water vole). Once more, none of this is referred to in your literature which is a shocking omission if you are asking members of the public with no knowledge of the Reserve to make an informed judgment. I only know about these issues as I am Friend of Crossness Nature Reserve and have been informed by others as well as informing myself.</p> <p>I would like to reiterate my utter dismay at the prospect of you erecting this second monstrosity, my complete opposition to the entire project and what has been, in my view, the disgraceful and misleading way you have marketed this “energy park” to the general public.</p> <p>I look forward to receiving more information on exactly what the works</p>		
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Appendix J.3 – Summary of Relevant Responses from section 42 Minor Refinements consultation

				under change references A2 and A1 would entail.		
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**Appendix J.4 Section 47 and Section 48 Statutory
Consultation Comments and
Applicant's Responses (June-July
2018)**

Appendix J.4 Section 47 and section 48 Statutory Consultation Responses and Applicant's Comments (June-July 2018)

Introduction

J.4.1 This Appendix contains details of the relevant responses to the Applicant's consultation carried out under sections 47 and 48 of the Planning Act 2008 (PA 2008) together with details of how the Applicant has had regard to those relevant responses when deciding whether the application it has made should be on the same terms as proposed when the consultation was carried out, in accordance with its duty under section 49 PA 2008.

Issues led approach

J.4.2 In compiling Appendix J.4 the Applicant has had regard to the Planning Inspectorate's Advice Note 141 and considers that it is appropriate to follow an "issues led approach", grouping responses under the key themes arising from the consultation. The Applicant considers that the key themes arising from the consultation under sections 47 and 48 are as follows (in no particular order):

- Consultation;
- The Project and its benefits;
- Alternatives considered;
- Project description;
- Transport and navigational risk;
- Air quality and odour;
- Health and safety;
- Noise and vibration;
- Townscape and visual impact assessment;
- Terrestrial biodiversity;
- Other considerations;
- Hydrology, flood risk and water resources;
- Socio-economics;
- Community impacts;
- Design; and
- General Comments.

¹Planning Inspectorate, *Advice Note 14: Compiling the consultation report*, April 2012, Version 2.

Comments form

J.4.3 Throughout the consultation under sections 47 and 48 PA 2008, the Applicant encouraged consultees to make use of a standard comments form (see **Appendix I.3**) which posed eight questions,² intended to elicit views on a diverse range of issues relating to the Applicant's proposals. The majority of consultees used the feedback forms and the Applicant considers that the questions are relevant to the context in which the relevant responses should be understood.

Structure of this Appendix

J.4.4 Advice Note 14 cautions applicants that choose to adopt an issues led approach that “*care must be taken to ensure that in doing this the responses are not presented in a misleading way or out of context from the original views of the consultee.*” The Applicant considers this issues led approach is appropriate as it enables consultees, and others with an interest in the Proposed Development, to easily identify other aspects of a theme that they may have an interest in.

J.4.5 To ensure the context of the relevant responses is presented clearly, both in terms of a thematic approach to the Applicant's consideration of the relevant responses and in terms of the questions posed by the Applicant that elicited the relevant responses, the Applicant has organised the relevant responses in to tables arranged according to theme. Within each table a heading repeats the text of the question included on the comment form that prompted the relevant response.

J.4.6 In the sixth column the Applicant has set out how it is has had regard to the relevant response in respect of the matters that pertain to theme of that table.

J.4.7 Some relevant responses raise issues that relate to more than one theme. Where this occurs the Applicant has adopted the following approach:

- Where a discrete body of text, sufficient to appreciate the context in which the relevant response is made, raises matters in respect of a theme, then that discrete body of text has been set out under the appropriate theme in bold type face. The Applicant has set out its consideration of the response in the sixth column of the table;
- Where a body of text within a relevant response raises issues across two or more themes, the Applicant has shown the text to which it is responding in bold type face; and

² The form contains a total of 9 numbered questions but question number 8 provided consultees with an opportunity to provide their contact details and responses to this question are not considered further in this Appendix.

- Text comprised in a relevant response that is shown in normal type face is not being considered by the Applicant under that theme and is instead considered elsewhere under the corresponding theme.

J.4.8 For example, a relevant response that reads “I am concerned about the traffic the scheme would cause and the increases to air pollution and the effects on habitats” raises issues that fall under the themes of transport and navigational risk, air quality and odour and terrestrial biodiversity. In the air quality and odour table (Table 6.6) this would be shown as “I am concerned about the traffic the scheme would cause **and the increases to air pollution** and the effects on habitats”. The Applicant’s consideration of this response in relation to the theme of air quality and odour would be set out in the sixth column of that table.

J.4.9 Conversely, that same part of the relevant response would appear in the table addressing the transport (Table 6.5) and navigational risk as “**I am concerned about the traffic the scheme would cause** and the increases to air pollution and the effects on habitats”. The same principle would apply under the terrestrial biodiversity theme.

J.4.10 The Applicant has maintained a database of relevant responses received and has carefully checked that it has considered all relevant responses in compiling this appendix in this way.

Identifying section 47 and Section 48 responses

J.4.11 None of the relevant responses received by the Applicant have specifically identified themselves as having been prompted by section 48 publicity. As such, it has not been possible for the Applicant to present section 48 relevant responses as a distinct “strand” of consultation as recommended by Advice Note 14. The Applicant has assumed that any relevant responses received from persons who were not consulted by it under section 42 have arisen as a result of section 47 consultation and those responses are detailed and considered in this Appendix.

J.5 Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	Proposals are good and obviously sensible and profitable for Cory's. However, there is an underlying feeling that there are areas which are not publicised. E.g. Waste being sent from other areas other than London ----- definite increase in road traffic carrying waste.	N	<p>The Applicant has undertaken a thorough and detailed pre-application consultation with various stakeholders including the Local Community, as set out in the Consultation Report (Document Reference 5.1). The information presented during the statutory consultation provided the preliminary environmental information from the Environmental Impact Assessment (EIA) process. The Applicant therefore does not agree with the assertion that there are 'areas which are not publicised' with regards to the Proposed Development.</p> <p>The Proposed Development will contribute to meeting the waste management needs of London. Annex A of The Project and its Benefits Report (Document Reference 7.2) provides an assessment of residual waste management capacity requirement in London and concludes a clear need for additional residual waste management capacity.</p> <p>While REP is intended to receive waste predominantly through river transport, Chapter 6 of the ES (Document Reference 6.1) provides an assessment of the potential transport impacts associated with REP. The Transport Assessment has assessed a '100% by road' scenario as a reasonable worst case scenario. The '100% by road' scenario considers all imported waste being delivered to REP by Refuse Collection Vehicles. This is a robust assumption, as some waste</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					would be imported in larger lorries – reducing the actual number of lorry visits in that scenario. No likely significant residual effects were identified as a result of the operation of REP.
	18.06.18	30.07.18	This is the first time I heard about this project and consultations because today I just received a letter from you by post regarding this topic. It seems to me that previously you not provided any information to local residents or it was at the very limited range, so consultation in May is not valid in my point of view.	N	<p>The Applicant carried out non-statutory consultation during May 2018 in advance of the commencement of the statutory consultation period. This allowed the Applicant to introduce the Proposed Development to the public, share the Applicant’s initial plans with people living in the vicinity of the Application Site, and gather initial feedback on the Proposed Development. The Applicant made available information regarding the Proposed Development from 9th May 2018 – 29th May 2018 on the project website (https://riversideenergypark.com/consultation/materials)</p> <p>As part of the non-statutory consultation, the Applicant hosted four non-statutory public exhibitions between 22nd-25th May 2018 in Belvedere, Dartford and Slade Green. The Applicant used a range of methods to advertise the May 2018 public exhibitions to the local community, including:</p> <ul style="list-style-type: none"> • Press Release on the Applicant’s website notifying users of the dates, times and venues of the non-statutory public exhibitions; • Postcards with details of the non-statutory public exhibitions, including the dates, times and venue locations, were distributed to c. 23,000 homes, businesses and community groups in the consultation zone; • Posters advertising the non-statutory public exhibitions delivered to local venues in the consultation zones; and

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<ul style="list-style-type: none"> • Twitter post from @CoryEnergy notifying recent public exhibitions. <p>Furthermore, the Applicant also employed a range of methods to advertise the July 2018 statutory consultation and public exhibitions, including:</p> <ul style="list-style-type: none"> • Online article in the Bexley News Shopper; • Posters advertising the consultation events were sent out by the Applicant to be displayed at community venues within the consultation zone; • An information leaflet containing an invitation to attend the public exhibitions was delivered to approximately 23,000 households, businesses and institutions in the consultation zone; and • An advertisement in the Bexley News Shopper. <p>The Applicant considered this to be a robust approach, and has undertaken its obligations to consult the local community in accordance with the relevant legislation and guidance.</p>
Local Community	18.06.18	30.07.18	I will ask to see the 'PEIR' document.	N	<p>Copies of the PEIR, its technical appendices and NTS were available to the public for viewing at Upper Belvedere Community Library, London Borough of Bexley Civic Offices and Dartford Library between 18th June – 30th July 2018, as well as at the public exhibitions held in July. Electronic copies were also available online at the Riverside Energy Park website. The Applicant advertised the section 47 Statutory Consultation, including information on where the PEIR could be viewed, through a number of methods including posters in local venues and via local and national newspaper adverts (published under requirements of section 48 of the Planning Act 2008)</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					(see Section 8 of the Consultation Report, Document Reference 5.1).
Local Community	18.06.18	30.07.18	I'm not impressed with your pressing on with the second phase of the consultation in which the "proposals" are identical to the ones in the first phase of the consultations. What are we to conclude from this? What was the initial feedback?	N	<p>The Applicant carried out non-statutory consultation during May 2018 in advance of the commencement of the statutory consultation period. This allowed the Applicant to introduce the Proposed Development to the public, share the Applicant's initial plans with people living in the vicinity of the Application Site, and gather initial feedback on the Proposed Development. Appendix J.1 of the Consultation Report (Document Reference 5.1) summarises the feedback from, and the Applicant's response to, the non-statutory consultation.</p> <p>During the non-statutory consultation, the key themes which arose from the general public were:</p> <ul style="list-style-type: none"> ▪ Potential impacts on ecology and local environment; ▪ Additional road movements; ▪ Air quality; ▪ Potential waste odour; and ▪ Construction impacts for the electrical connection. <p>The Applicant therefore sought to include additional information regarding these topic areas in the information presented at the statutory public exhibitions, as shown on the July 2018 Consultation Panels (Appendix I.4, Document Reference 5.1) and to ensure these matters were adequately addressed in the PEIR published at the time of the statutory consultation.</p> <p>The Applicant made available information shown at the statutory consultation public exhibitions regarding the</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					Proposed Development from 9th May 2018 – 29th May 2018 on the project website (https://riversideenergypark.com/consultation/materials)

J.6 Alternatives Considered

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	Unhappy about three incinerators within one mile.	N	The Applicant considers the location of REP to be highly suitable for this type of development as it maximises the use of existing infrastructure (the jetty and the River Thames). The Proposed Development can be provided without significant effects on the environment or the local community.
	18.06.18	30.07.18	Why cannot west London boroughs build an incinerator in West London to deal with their own waste. Bexley borough should hang its head in shame to even consider such a proposal yet alone be considering giving consent. Whatever financial gain for Bexley if this proposal goes ahead will just go into the coffers where the average person will find it difficult to see any benefit.		
	18.06.18	30.07.18	Pleased that the new incinerator will take more rubbish away from landfill and will provide other energy options such as the solar panels. Could more renewable energy be generated possibly from wind turbines on the site or is this not feasible or would affect wildlife like birds?	N	The Applicant considers that both micro-wind technologies and large turbines would not be appropriate for the REP site. Building-mounted turbines are yet to deliver long-term reliable performance due to a combination of high turbulence in built-up areas and challenges connecting to buildings without causing structural vibration. Therefore, wind energy was not considered to be an effective solution for the REP site.
	18.06.18	30.07.18	As an unlucky resident of Belvedere I would like to express that I am strongly against the proposed SECOND incinerator. The proximity of the river Thames providing good means for transporting the rubbish is an understandable reason for the choice of location but Belvedere is highly industrialised and polluted already and the second rubbish burning factory will make it even worse. However, the choice of location is not directed only by easy access to the river. Belvedere being one of the poorest and most deprived area without strong local	N	The Applicant considers the location of REP to be highly suitable for this type of development as it maximises the use of existing marine infrastructure (the jetty and the River Thames). The Applicant has carried out a thorough pre-application consultation process with the local community including, non-statutory consultation and statutory consultation. A Statement of Community Consultation (SoCC) was prepared in consultation with

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>opposition makes it a lot easier to plant such projects. If this project was proposed in West London, the local affluent and influential people would stop it from happening. What the poor people of Belvedere can do? Not much. The first incinerator was constructed despite local opposition and it feels like the second one will be as well.</p>		<p>the London Borough of Bexley to ensure that the Applicants consultation strategy was appropriate for the people living in its borough. The Applicant therefore considers that the people of Bexley have had adequate opportunity to inform the proposals and to raise any concerns which have been considered in the preparation of the application.</p> <p>Furthermore, the Applicant is active within the local community and regularly attends the Belvedere Community Forum such that views of local residents on its operations can be heard.</p> <p>The ES (Document Reference 6.1) presents the findings of the EIA, a summary is included in Chapter 16 and the Non-Technical Summary (NTS) (Document Reference 6.4).</p> <p>The Applicant's existing RRRF has been operating successfully and meeting all emissions standards since it opened in 2011.</p>
	18.06.18	30.07.18	<p>I'm not against the use of solar panels, perhaps you could install them on the roof of the existing incinerator and consider renting roof space on the surrounding buildings to maximise solar power production...</p>	N	<p>The Proposed Development comprises an integrated Energy Park including complementary energy generation equipment, which seeks to maximise the provision of solar panels as part of the Proposed Development. As RRRF is not included within the DCO Application, it is not considered appropriate to explore options for retrofitting solar panels at RRRF within the DCO. Further, the RRRF stack being located at the south end of the plant casts a shadow over the facility making it unsuited to solar generation.</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>The Proposed Development comprises an integrated Energy Park including complementary energy generation equipment, which seeks to maximise the land holding. It would therefore not have been appropriate to have explored options for retrofitting solar panels to existing buildings not owned by the Applicant.</p>

J.7 Project Description

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	And finally who is going to benefit from this green energy ie: What areas are going receive this green energy. Thanks.	N	Chapter 3 of the ES (Document Reference 6.1) provides a description of the Proposed Development and its operation. REP will connect to the existing electricity distribution network via the Electrical Connection to the existing Littlebrook substation. REP will also provide the opportunity for heat export to c. 10,500 local businesses and homes via the Combined Heat and Power (CHP) infrastructure at the REP site. The Applicant is working closely with the London Borough of Bexley and local housing associations to deliver a local district heating network. Further details are provided in the CHP report (Document Reference 5.4) that accompanies this application.
	18.06.18	30.07.18	I do understand that there will be some solar panels on the roof of the building but what percentage of all the energy produced will come from them?	N	The Proposed Development comprises an integrated Energy Park including complementary energy generation equipment, which seeks to maximise the land holding. Up to 1.2 MWe of renewable energy could be generated by the solar panels (c. 1.25% of the overall likely generating capacity), however this will be dependent upon best technology available at the time the facility is constructed.
	18.06.18	30.07.18	Where will the barges full of rubbish be parked?	N	Any vessels will be temporarily moored at existing mooring points close to the existing jetty. All waste brought in via the River Thames will be transported in sealed containers.
	18.06.18	30.07.18	It is stated initially the plant be incinerating only household waste from various Boroughs, but there is another long term concern, that has not been declared, in that there	N	The Proposed Development will be regulated by the Environment Agency under the terms of an environmental permit and it will only treat waste that is

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>could be a possibility of incinerating toxic waste or products from abroad, with its close proximity to the Thames estuary.</p> <p>Based on the conclusion drawn, it is my opinion that the proposed scheme should be rejected in its entirety.</p>		<p>suitable and will be subject to strict emissions monitoring. Therefore, processes would be in place to screen the suitability of waste streams.</p> <p>In addition, the assessment outlined in Project and its Benefits Report (Document Reference 7.2) only considers, London's waste, responding to the policy demand for London to be net self-sufficient. Whilst the ERF within REP is promoted to take waste from within London, there is no justification for it to be limited to the capital, especially given its location and being a nationally significant infrastructure project. As such, there is an identified need for approximately 2 million tonnes of residual waste management capacity required across the waste planning authorities adjacent to London.</p> <p>The Proposed Development will contribute to meeting the waste management needs of London, and further information on the sources of waste, and the benefits of the Proposed Development, are set out in the Project Benefits Report (Document Reference 7.2).</p>
	18.06.18	30.07.18	<p>(3) There is no information forthcoming on the routing of power cables (other than a final destination of disused Littlebrook power station) Ripping up the existing scarce traffic free public rights of way would not find favour with me. The Thames River path would be preferable as a route in my view as it would have to be upgraded afterwards including the provision of a pedestrian bridge over the River Darent. But that would require money which seems not to be on offer.</p>	N	<p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Development Consent Order to be granted on the basis of a single route.</p> <p>The Applicant’s consideration of alternative routes for the Electrical Connection is set out in chapter 5 of the Environmental Statement (Document Reference 6.1). The Applicant considers that the route options it has taken forward into its application for the Proposed Development are appropriate and provide a suitable degree of flexibility to respond to engineering constraints.</p>
<p>Question 4 – Do you have any comments on the design of the proposed Energy Park and the factors (social, environmental and economic) that we have taken into account in our preferred design, including our preference for a stepped, rather than a curved or flat building form?</p>					
Local Community	18.06.18	30.07.18	<p>It is claimed the “stepped” design allows for solar panels to provide up to 1000 homes with power – at what point is the natural environment and large sky views measured against power generation – I would suggest 1000 homes is not significant in the grand scheme of things. I opted for the curved design in the original consultation and repeat it now.</p> <p>Have Cory considered buying/renting space on other flat roofs in the area to increase the potential for solar panelling?</p>	N	<p>The stepped design has been chosen as the preferred option for a number of social, economic and environmental reasons, and has been incorporated as mitigation for the purpose of reducing potential visual effects as far as practicable.</p> <p>The Planning Statement (Document Reference 7.1) sets out the planning policy context and assesses the Proposed Development against policy requirements, including an assessment of the overall planning balance of the scheme. The stepped design cannot be construed as being only for the purpose of providing power to the c. 1000 homes which may benefit from the additional output from the solar panels, but ought to be considered holistically against the project as a whole.</p> <p>Furthermore, the Applicant considers the stepped roof building form (design 3) to present the best overall solution. The building form selected in the Design</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual impact.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3).</p> <p>The Proposed Development comprises an integrated Energy Park including complementary energy generation equipment, which seeks to maximise the land holding. It would therefore not have been appropriate to have explored options for retrofitting solar panels to existing buildings not owned by the Applicant.</p>
Question 6 - Do you have any comments on the different options for the route of the electrical connection? (The options are labelled 1,1A,2A and 2B).					
Local Community	18.06.18	30.07.18	Use 1a and 1 it looks less distance and less turns/chance to get damage cables	N	<p>The Applicant had noted these comments in response to consultation on the different electrical connection route preferences.</p> <p>The Applicant is working closely with UKPN to progress technical engineering studies and to work towards confirming the final route. Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p>
	18.06.18	30.07.18	Use site 1.		
	18.06.18	30.07.18	1A → 2A		
	18.06.18	30.07.18	The blue route seems to be the logical route and most practical 1A-1		
	18.06.18	30.07.18	Option 2A should be undertaken, 2B should be avoided, the reasons why option 2A is good because it is mainly industrial or trading area along the Thames Road, so there is no much impact for local residents and also it might benefit to local business. 2B is not good because there is a local community and new houses, so there no		

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			reason enter there, much better is to follow Bob Dunn Way.		<p>The Applicant has taken account of environmental, engineering and electrical considerations to date, and the responses received during non-statutory and statutory consultation (see Sections 9 of the Consultation Report, Document Reference 5.1), and has identified a preferred route which is explained in Chapter 3 of the ES (Document Reference 6.1). All route options have however been retained for the purpose of the DCO application and assessed in the EIA. The Electrical Connection options for which development consent is sought through the DCO Application are reflected in the Works Plans (Document Reference 2.2).</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
	18.06.18	30.07.18	I prefer the residential route – i.e to keep the main 206 route clear for traffic throughout.		
	18.06.18	30.07.18	In my opinion I think the Route 2A is better because route less disruption on the dual carriage way		
	18.06.18	30.07.18	I think Route 1 should be the preferred option it should be away from any residential areas as much as possible.		
	18.06.18	30.07.18	I strongly object to route 2A, due to location of my home.		
	18.06.18	30.07.18	Yes! I've already said NO cables through the nature reserve, so NO to option 1.	N	<p>The Applicant had noted these general comments in response to consultation on the different electrical connection route preferences.</p> <p>The Applicant has taken account of environmental, engineering and electrical considerations to date, and the responses received during non-statutory and statutory consultation (see Sections 9 of the Consultation Report, Document Reference 5.1), and has identified preferred route which is explained in Chapter 3 of the ES (Document Reference 6.1). All route options have however been retained for the purpose of the DCO application and assessed in the EIA. The Electrical Connection options for which</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>development consent is sought through the DCO Application are reflected in the Works Plans (Document Reference 2.3).</p> <p>The Applicant is working closely with UKPN to progress technical engineering studies and to work towards confirming the final route. Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p>
	18.06.18	30.07.18	I think there will be a problem with 2A The route if agreed with land lords and local authority is sure good.	N	The Applicant will continue to engage with the local highway authorities and relevant local planning authorities regarding the Electrical Connection route options during the examination, if the application is accepted.
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	Do you want to build any transformers stations on proposed route or just only buried cable will be on this route.	N	The Electrical Connection will run underground between the REP site and the Electrical Connection Point at Littlebrook substation connecting into an existing National Grid building in Dartford. No external

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					alterations or upgrades at Littlebrook substation are required, as described in Chapter 3 of the ES (Document Reference 6.1).
	18.06.18	30.07.18	Yes like I mentioned earlier - Carbon capture storage facility or tank.	N	Section 4.7 of NPS EN-1 explains the considerations to be given to Carbon Capture and Storage (CCS) and explains that all applications for new combustion plant which are of a generating capacity at or over 300MW and of a type covered by the EU's Large Combustion Plant Directive (LCPD) should demonstrate that the plant is "Carbon Capture Ready" (CCR). On the basis that the Proposed Development's maximum rated electrical output would be lower than 300 MW, the Proposed Development would be below the threshold set out in Directive 2009/31/EC29 to consider CCS.
	18.06.18	30.07.18	Will you be in a position to assist the residents of the area for solar energy in each house or block of flats	N	The Proposed Development will be connected to the existing electricity distribution network at the existing substation in Littlebrook, Dartford. The development is not related to installation of solar panels for residents.
Question 9 – Any other comments					
Local Community	18.06.18	30.07.18	You have made no mention of temporary compounds in your questions above but I have concerns. You are not clear where these compounds will be either for the main construction or for the laying of cable routes (two separate requirements as I understand it) other than suggesting they will be on land within the Norman Road north boundary.	N	The location of the main Temporary Construction Compound and Laydown areas are shown the Works Plans submitted with this application (Document Reference 2.4) and will be on land adjacent to Norman Road. Cable Route Temporary Construction Compounds required to support the construction of the selected Electrical Connection route will comprise small discrete compounds, required for a period of time whilst works are undertaken along particular lengths of the Electrical

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Connection route. The final location of these compounds are currently unknown however will be within Work No. 9 as shown on the Works Plans submitted with this application (Document Reference 2.4).</p> <p>Chapter 5 Alternatives Considered of the ES (Document Reference 6.1) considers the optioneering assessment for the main Temporary Construction Compound site and Electrical Connection.</p>

J.8 Transport and Access

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	This all sounds good and I'm all for green energy but your information booklet doesn't really give a good account of what disruption to the local area i.e.: traffic between Erith and Dartford along the A206 and Bob Dunn Way. These areas can't cope with disruption so what are your plans for this.	N	<p>A full traffic and transport assessment has been undertaken of the peak Construction period (anticipated to be Month 13 of the programme) and for two scenarios (the 'nominal' scenario and the '100% by road' reasonable worst scenario) representing possible Operational methods at REP. These are presented and appraised in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the strategic road network, within the agreed area of the TA scope, during the construction and operation of the Proposed Development.</p> <p>The scope of the reports was agreed with the Local Planning Authorities; Local Highway Authorities and Highways England.</p> <p>As a method of applying a reasonable worst case scenario for the purposes of a transport impact assessment for Electrical Connection construction worker trip generation to the network, the assumption has been taken that those workers would all visit a single point along the proposed Electrical Connection route. A hypothetical position has been identified for this purpose along Bob Dunn Way close to the River Darent. In practice the movements for the Electrical Connection would be more widely distributed across the cable route depending on the location of the works at that time.</p>
	18.06.18	30.07.18	I am a resident on the Bridge development off the A206, University/Bob Dunn way. Reading the information that came in the post yesterday I am very concerned that you are considering the A206 as a route to bury electricity cables from the existing Littlebrook power station. As you know, that route to the Dartford Bridge/M25 is heavily congested at the best of times. The thought of the roads being dug up, causing more traffic problems is a nightmare for me and thousands of others who use that route. Getting home in rush hour is awful at the best of times. How long would the process take? Looking at the map and the distance approx. 8km its going to cause disruption definitely. Surely the route closer to the Thames would cause less disruption. I look forward to your reply.		
	18.06.18	30.07.18	Further to the proposed scheme, submitted by Riverside Energy Park, for the construction of a new incinerator at Belvedere. It is understood the consortium would like to construct an incinerator that will generated power, which can then be sold for a profit to the National Grid. This power will then provide additional sustainable electricity for the grid and will be of no benefit to local areas. However, this will involve a 132KV HV cable link, to the		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>grid at the former Littlebrook Power Station. To carry out this link will require the cable being laid underground, along 8KM of a heavily used major road network that links trade parks and public transport from Belvedere to Dartford Tunnel. It is appreciated two routes have been proposed, but either way will result in excessive construction works for a long period of time. A traffic survey along the route at peak times would have identified the present traffic issues experienced, with traffic extending from the tunnel to Erith during the morning and in reverse during the evening. In addition to that, whenever there is trouble at the tunnel roads get congested all around. The proposal will inconvenience both business and local communities yet again.</p> <p>Based on the conclusion drawn, it is my opinion that the proposed scheme should be rejected in its entirety.</p>		<p>Automated Traffic Counts were collected to form a baseline data of traffic on the local highway network. The construction effects have shown adverse driver delay effects on the A206/ A2016/ Bexley Road roundabout. Mitigation measures to reduce these effects are outlined within the draft CTMP (Appendix L of the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3)), that has been prepared for the Proposed Development. No likely significant effects are identified, if mitigation is implemented.</p> <p>The construction works associated with the Electrical Connection would be transient and would result in delays similar to other statutory utility road works as the construction process moves along the route. The construction works would not be as extensive or as disruptive as major road works. A qualitative assessment of the Electrical Connection options was undertaken for the ES. However, the Applicant is working closely with UKPN to confirm the final route, taking into account environmental, engineering and electrical considerations.</p> <p>The statutory utility company's contractor who constructs the Electrical Connection anticipates that, regardless of whether the cable is installed in the highway, verge or footway, that a single lane highway closure would normally be required to undertake their construction works. A programme and methodology for the construction of the route and options would be prepared by the Applicant and the utility company to assess the most favourable route. This would be prepared in collaboration with the Local Authorities to seek to reduce the impact of its delivery and co-ordinate</p>
	18.06.18	30.07.18	<p>Dear sir / madam, regarding the proposed routes for laying cable from Belvedere to Littlebrook power station. I have a very vivid memory of the time when Thames rd was widened, and the absolute traffic chaos that that caused. The traffic fumes were coming into my home on and off all day long!! It was dreadful. Needless to say, I am making the strongest possible objection to the cable being laid along the A206.</p>		
	18.06.18	30.07.18	<p>I agree that there needs to be a sustainable approach to dealing with waste and your plans seem good. However, I have concerns about the impact of the site on the wildlife of your building site and the laying of cables; the cleanliness of the River Thames; the impact on traffic in the area as you say that you will be bringing lorries in as well and the air pollution the site will generate.</p>		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	The cable route will cause much digging, noise & lorries in Erith?		with other operations, such as bus services and frontage access.
	18.06.18	30.07.18	There will be considerable upheaval during the building process , noise additional traffic , displacement soil and vegetation, let alone night time security lights which will impact on nocturnal creatures.		It has been shown that the Proposed Development would not have materially significant residual impacts on the transport network either during construction or once REP would be operational. REP would be suitably located to maximise the benefits of the proximity of the River Thames and has good connectivity to the strategic road network. As noted above, temporary impacts would be ameliorated by applying Construction Traffic Management Plans and Operational Worker Travel Plan, further reducing the impacts of the Proposed Development.
	18.06.18	30.07.18	I wish to protest in the strongest possible terms at the poor quality of the information provided for the public "consultation" on the proposed riverside energy park in Belvedere. In fact, none of the information I seek is provided. (1) Will the waste for incineration be delivered to site by river barge or by road (lorries)? You will recall that the original planning permission for the existing site mandated delivery by barge. You are attempting to avoid a similar mandate by simply not committing to a delivery mode.		The DCO application has considered the environmental impacts of transporting waste by both road and river, the likely significant effects are presented in Chapter 6 of the ES (Document Reference 6.1). REP will be ideally located to maximise the use of the River Thames and the Applicant's existing infrastructure therefore, the waste input ratio of 75% by river and 25% by road is being assessed. This is similar to the current balance of operations at RRRF.
	18.06.18	30.07.18	Thank you for the information. I have subsequently seen a drawing of your two proposed routes and the one following Thames Road and Bob Dunn Way seems to allay my fear of a crossing on the tidal part of Crayford Creek. Thank you for your confirmation. I would like to stress that any further restriction of air draft under the Bob Dunn Way bridge over the Dartford Creek would limit navigation access to the head of Dartford Creek. If you		As well as the '25% by road' scenario (known as the 'nominal' scenario), the Transport Assessment has assessed a '100% by road' scenario as a reasonable worst case scenario. The '100% by road' scenario considers all imported waste being delivered to REP by Refuse Collection Vehicles. This is a robust assumption, as some waste would be imported in larger lorries – reducing the actual number of lorry visits in that scenario.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			look on the Friends of Dartford and Crayford Creeks Facebook page you will see videos of the sailing barge Decima going under the bridge with very little headroom. I hope that your development does nothing to make that worse.		<p>The Navigational Risk Assessment (Appendix B.2 of the ES Document Reference 6.3) has assessed the ‘100% by river’ scenario and concludes that the Proposed Development would have negligible impact upon navigational safety on the River Thames.</p> <p>The Applicant acknowledges the comment about air draught on the Dartford Creek. The construction of the Electrical Connection would be carried out such that the current restrictions on air draught are not impacted.</p>
	18.06.18	30.07.18	I am a member of the Friends of Crossness Nature Reserve and have strong reservations about the use of an easy route for cabling by using a public footpath. Not only will this affect our access while the footpath is closed for installation of the cable but the impact on local wildlife as the path is between two ditches used by water voles which are already in significant decline. I strongly urge you to use Norman Road for the cabling route to minimise the impact on the nature reserve and those who access it.	N	The detailed requirement for any temporary footpath closures or diversions around the REP site is not yet known. However, appropriate diversions would be discussed with the relevant local authorities and put in place to ensure impacts on users are not significant. The route of FP2 across Crossness Nature Reserve could require temporary closure with the route for diversion expected to be using Norman Road.
Question 2 – Please tell us your views on our proposed use of the River Thames					
Local Community	18.06.18	30.07.18	Due to the traffic created by Dartford bridge and the surrounding infrastructure, utilising the Thames as a pathway for waste is a great idea.	N	The Applicant welcomes this comment.
	18.06.18	30.07.18	Given that I've said NO TO ANOTHER INCINERATOR, it naturally follows that there is no need for increased traffic on the river!	N	The Navigational Risk Assessment (Appendix B.2 of the ES Document Reference 6.3), to consider the impacts of the project on the safety of navigation, has been developed as part of the Environmental Statement supporting the REP Development Consent Order application.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Do not add more traffic to the local roads, including that of Norman Road. Perhaps the construction traffic can also come via river?? I am very concerned about the road impacts during the construction phase.	N	<p>A full traffic and transport assessment has been undertaken and is presented in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the local road network during the construction of the Proposed Development and for the Operational period.</p> <p>It has been shown in the Transport Assessment and Chapter 6 of the ES (Document Reference 6.1) that there would be no significant transport impacts on the transport network, following the implementation of mitigation measures, such as a Construction Traffic Management Plan and an Operational Worker Travel Plan. Construction effects would be Minor adverse and temporary, and therefore Not Significant. A draft Construction Traffic Management Plan and an Operational Worker Travel Plan have been prepared for the Proposed Development. The final documents would be secured as Requirements of the DCO.</p> <p>REP will be ideally located to maximise the use of the River Thames and the Applicant's existing infrastructure. Where feasible the Applicant will consider opportunities to transport construction material by river.</p>
	18.06.18	30.07.18	Clearly any reduction in road traffic and use of the river is to be welcomed. However, similar arguments were made for the first incinerator (RRRF) with subsequent requests to LBB for increased lorry journeys to/from the site. So I don't trust the figures presented.		
Question 3 – Please tell us your views about approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	As mentioned in point number one, your approach for the air quality, transport management and traffic tremendous. This: 2. Traffic by the ferry and black wall tunnel are others.	N	The Applicant acknowledges these comments, however, the query or statement made in point no. 2 is not clear.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			3. Therefore your traffic and transport management will modernise or regulate the areas!		<p>In relation to point no. 3, Chapter 6 of the ES (Document Reference 6.1) and the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3), present a full traffic and transport assessment that has been undertaken. These assessments describe impacts on the local road network during the construction and operation of the Proposed Development. The construction effects have shown adverse driver delay effects on the A206/ A2016/ Bexley Road roundabout and the A206/ Boundary Street/ Dell View Road roundabout. Mitigation measures to reduce the severity of these effects are outlined within the draft CTMP (Appendix K of the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3)). This would reduce effects to minor adverse and temporary, and therefore Not Significant.</p> <p>An outline Construction Traffic Management Plan and an outline Operational Worker Travel Plan have been prepared for the Proposed Development. The final documents would be secured as Requirements of the DCO.</p>
	18.06.18	30.07.18	Transport management is at the heart of community concerns. The proper management of these to the extent that they must meet the acceptable requirement/levels are important. This should be punctual as part of consideration for this development		
	18.06.18	30.07.18	I understand there may be an impact on traffic/development during construction phases. I expect this may cause some divided views in the community and may affect me too. I am assured this is temporary. i.e. just during construction phase	N	
	18.06.18	30.07.18	Concerned about traffic in the construction phase		
	18.06.18	30.07.18	We are concerned that digging up the A206 dual carriageway is going to cause havoc to an already		<p>A full EIA has been undertaken in respect of the Proposed Development and the findings are presented in the ES (Document Reference 6.1). This includes assessments of transport, noise and air quality.</p> <p>Chapter 6 of the ES (Document Reference 6.1) and the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.1), present a full traffic and transport assessment that has been undertaken. These assessments describe impacts on the local strategic</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			very busy stretch of road. The council have already made things 100 times worse in installing the new traffic lights which has made the once free flowing traffic come almost to a standstill at peak times. This is going to impact on the local school and the surrounding residents producing more pollution and noise and more traffic disruption.		road network during the construction and operation of the Proposed Development. The construction effects have shown adverse driver delay effects on the A206/ A2016/ Bexley Road roundabout. Mitigation measures to reduce the severity of these effects are outlined within the draft CTMP (Appendix K of the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3)). This would reduce effects to minor adverse and temporary, and therefore Not Significant.
	18.06.18	30.07.18	LBB already suffers higher than average air pollution but I do not feel qualified to speak on this subject. The Anaerobic Digestion facility requires collections from local sources thereby increasing road traffic which I suggest Bexley cannot cope with. There is already overload of traffic to the ASDA warehouse and RRRF plus other developments along this main road.		The assessment describes the impacts on the local strategic road network from the operational Proposed Development, cumulatively with other developments. The assessment has shown that effects will not be significant.
	18.06.18	30.07.18	I do not think that you have thoroughly thought this through. The spine road gets very busy at peak times, so there will be increased traffic delays and air pollution which you have not really addressed in your plans. You have not said enough about traffic and transport management.		The proposal is to seek a local source of green waste, i.e. from within LBB – which will reduce the need to transport that material over a longer distance and facilitating its use as a future resource.
	18.06.18	30.07.18	Concerned that there will be no reduction in heavily laden lorries using Bexley Roads, even though the river will be used for much of the new traffic. In truth, their may be an increase. Bexley Roads are already at saturation point.	N	The Applicant expects to make extensive use of the River Thames for transporting waste and ash during REP's operation and remove around 80,000 further lorry journeys from London's road network each year. Chapter 6 of the ES (Document Reference 6.1) and the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3), present a full traffic and transport assessment that has been undertaken. The assessment concludes that there will be Negligible impacts on transport during the operational phase and therefore no significant effects have been identified.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Local Community	18.06.18	30.07.18	So long as no major increase to road traffic, as Belvedere and Erith are already very busy due to A206 being main link from M25/Dartford to Erith etc	N	The Applicant acknowledges this comment and notes that any traffic movements generated by the construction of the Proposed Development would be relatively small in relation to existing flows. During the peak period of construction, it is predicted that traffic volumes would increase by less than 5% on the current a.m. peak traffic movements at junctions to the south east of REP – with the impacts reducing further away from the Proposed Development. Once operational it is predicted that traffic impacts would be largely imperceptible – at less than 1% during the a.m. peak period under the robust ‘100% by road’ reasonable worst case scenario. The a.m. peak period has been assessed as the more susceptible to travel impacts.
Local Community	18.06.18	30.07.18	All efforts should be made to go above and beyond the current “acceptable levels” of air quality we’ve seen in recent years how quickly these things can change and for us local residents it is very important that our health is a priority. Investing in transport management to improve the surrounding area should also be looked at.	N	There will be significant benefits for the local community through Cory’s investment as described in the Project Benefits Report (Document 7.2). REP will be ideally located to maximise the use of the River Thames and the Applicant’s existing infrastructure. The Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3), present a full traffic and transport assessment that has been undertaken. The assessment concludes that there will be Negligible impacts on transport during the operational phase and therefore no significant effects have been identified.
Question 6 - Do you have any comments on the different options for the route of the electrical connection? (The options are labelled 1,1A,2A and 2B).					
Local Community	18.06.18	30.07.18	Option 1: which mainly follows the Bronze Age way, is the preferred. Getting around Erith/Belvedere is getting increasingly difficult, local roads like West Street/Manor	N	Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed.

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			Road and the Town Centre, are difficult to navigate it as road works/Traffic lights all over. With the scheduled development set for Erith and the surrounding area. Local residents should take preference.		<p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>The Proposed Development has been subject to a full EIA, the results of which have been provided in the ES (Document Reference 6.1). This has considered all likely significant effects on the environment and nearest sensitive receptors as a result of the construction and installation of the Electrical Connection route, as agreed during EIA scoping. Mitigation measures will be used as appropriate where they are necessary to limit impacts.</p> <p>Impacts associated with the construction of the Electrical Connection route have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1). UKPN propose to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network, however it is likely that single lane closure would be required to facilitate a safe working area or localised footway diversion. In addition, UKPN has confirmed that they will use 'ducting' which means they can dig up short sections of road at a time, rather than digging up longer stretches, which would be more likely to cause greater disturbance. The scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.</p>
	18.06.18	30.07.18	I prefer the residential route – i.e. to keep the main 206 route clear for traffic throughout.		
	18.06.18	30.07.18	Route 1 is poor as construction activity would exacerbate the existing traffic problems on the approach to the Dartford crossing. A combination of 1A to 2A along 2B would be a much better option as it would avoid the busier roads and have a lesser impact on traffic flows.		
	18.06.18	30.07.18	Main issue is 1 or 2A. 2A will affect fewer people as these roads are used less.		
	18.06.18	30.07.18	Construction along the proposed route 1 would exacerbate traffic issues on the approach to the Dartford crossing. 1A and then along 2A to 2B would be a much better option as it would keep construction work along back streets and wouldn't cause too much disruption along main roads.		
	18.06.18	30.07.18	2A would be preferred as this would affect fewer people on the A206 & keep this route flowing		
	18.06.18	30.07.18	Please see above we are concerned that digging up the A206 is going to create more traffic chaos, pollution from stationary vehicles and noise. The issue is how long is the disruption going to last for? This dual carriageway is forever being dug up. The public wouldn't mind so much if the work was completed quickly and efficiently but some of the contractors let work drag on for months. The public don't want or		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			need anymore upheaval this dual carriageway is congested enough at peak times.		<p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix L of the Transport Assessment (TA) (Document Reference 6.3)) has been submitted with the DCO application.</p> <p>Any necessary diversions and temporary path closures would be discussed with KCC and LBB officers as part of the design and mitigation process for the construction of the Electrical Connection route.</p>
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	What will be the impact regarding roads closures during the cable installation.	N	<p>Traffic impacts associated with the construction of the Electrical Connection route have been considered in Chapter 6 of the ES (Document Reference 6.1).</p> <p>A qualitative assessment of the Electrical Connection options was undertaken for the ES. However, details of the programme, final alignment and method of construction of the Electrical Connection are not known at this stage. It is anticipated that, regardless of whether the cable is installed in the highway, verge or footway, that a single lane closure would normally be required. A review of the route options is currently being undertaken by the Applicant and UKPN to assess the most appropriate route.</p> <p>Where the route crosses side roads, there could be a requirement for short term closures. Where possible, the contractor constructing the Electrical Connection, will carry out the side road crossing in two sections.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Alternative access routes would be provided, as necessary.</p> <p>UKPN has confirmed that they will use ‘ducting’ which means they can dig up short sections of road at a time, rather than digging up longer stretches, which would be more likely to cause greater disturbance. UKPN also propose to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network. It is likely that single lane closure would be required to facilitate a safe working area or localised footway diversion. However, the scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.</p> <p>Qualitative impacts associated with the construction of the Electrical Connection route have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1).</p>
Question 9 – Any other comments					
Local Community	18.06.18	30.07.18	Please no disruption to the area traffic can't cope.	N	The Applicant has noted this comment. Chapter 6 of the ES (Document Reference 6.1) considers the effects associated with the change in traffic levels as a result of the construction, operation and decommissioning of REP. It concludes that the results of the assessment have shown that the only point on the network that the Proposed Development will result in likely adverse impacts is at the A206/ A2016/ Bexley

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					Road roundabout during construction. However, these impacts will be temporary and following mitigation measures outlined in Section 6.11 of the ES (Document Reference 6.1), would be minor adverse and therefore Not Significant.

J.9 Air Quality and Odour

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	My comments are about the possible air pollution? especially for those living along riverside Erith.	N	<p>Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant air quality effects from the operational phase of REP. The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency.</p> <p>In addition, the impact of emissions from additional road traffic associated with REP have been assessed at a number of sensitive human health receptors. Concentrations of relevant pollutants are all below the appropriate objectives and impacts are not significant. A qualitative assessment of emissions from operational river vessel movements has also been undertaken which has not identified any significant effects.</p> <p>Responses in relation to the impact of the Proposed Development on health are addressed in Chapter 15 of the ES (Document Reference 6.1)</p>
	18.06.18	30.07.18	Will there be more air pollution for Erith?		
	18.06.18	30.07.18	Being someone who lives nearby I didn't want the original Riverside resource facility burning the waste from the well off boroughs and fought against that but it was still built and we don't need the Riverside energy park and a load more waste. We were told then that our borough had the third highest air pollution in London so why on earth would we need more. But as usual we will not be able to stop this being built and as for the proposed cable routing any use of the road route would cause more congestion/pollution again something we do not need. Thanks for asking but as usual it's a done deal and this would seem to be some publicity exercise again.		
	18.06.18	30.07.18	I welcome any project that reduces carbon emissions and provide creative solutions to our waste disposal and recycling challenge. The project has to take account of the local environment and ecology including Crossness nature reserve and breeding birds, and minimise impact on this wonderful resource, through the route of the cable and the design of the facility. The impact on the local community needs to be mitigated through careful consideration of the health hazards in relation to air quality , and the impact of the transport of waste and energy to and from the facility.		

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Dear sir / madam, regarding the proposed routes for laying cable from Belvedere to Littlebrook power station. I have a very vivid memory of the time when Thames rd was widened , and the absolute traffic chaos that that caused. The traffic fumes were coming into my home on and off all day long!! It was dreadful. Needless to say, I am making the strongest possible objection to the cable being laid along the A206.		
	18.06.18	30.07.18	I agree that there needs to be a sustainable approach to dealing with waste and your plans seem good. However, I have concerns about the impact of the site on the wildlife of your building site and the laying of cables; the cleanliness of the River Thames; the impact on traffic in the area as you say that you will be bringing lorries in as well and the air pollution the site will generate.		
	18.06.18	30.07.18	(2) You do not state if the levels of incineration exhaust gas residues will be better, the same, or worse than those from the existing chimney stack. This would be much easier to grasp (and compare) for a layman like me than an estimate of absolute sulphur and nitrogen residues (and even that does not appear to be forthcoming)		Chapter 7 of the ES (Document Reference 6.1) explains that the impact of emissions from REP have been assessed, using detailed dispersion modelling to identify maximum concentrations as well as concentrations at worst case receptors. A number of reasonable worst case assumptions were made regarding building size, stack height and emissions. In addition, existing sources of pollution in the area (RRRF and Crossness Sewage Treatment Works) have been taken into account along with emissions from traffic where appropriate. Impacts at human health receptors are considered not significant for all pollutants. The impacts to terrestrial habitats are also considered Not Significant.

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					As with the RRRF, the operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency.
	18.06.18	30.07.18	I have received one of your brochures which outlines the proposed project. The choice of words "clean" , "renewable" , "waste energy recovery" sends an incorrect message ...why not simply call it by its name "tons of rubbish from all over London will travel to Belvedere and will be burnt here. All the fumes and toxic air will come out of chimneys just outside your door"		Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant air quality effects from the operational phase of REP. The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency.
	18.06.18	30.07.18	I write with reference to the above consultation, as a concerned local resident of Belvedere. You have described and branded your proposal as an 'energy park', which obviously projects an image of a clean and environmentally friendly facility. Moreover, you have stated that the park will be located to the west of your 'existing Riverside Resource Recovery Facility (RRRF) which has been operating successfully and cleanly since 2011.' Your representation of your proposed Energy park and existing RRRF is nothing of a Kind. I have been resident In Belvedere for the full operating life of your existing facility and have personally observed its production of, nothing but pollution engulfing the local Belvedere Community and beyond. The pollution produced by your existing facility is of such potency that it has the following measurable effects: <ul style="list-style-type: none"> • Most evenings and days, vast fumes can be clearly seen emanating from your facility • I have often left my car parked on the street for a mere day, after which large particles of dust have covered 		Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant air quality effects from the operational phase of REP. The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency. In addition, emission filters and rigorous control mechanisms are incorporated within the design of the stack to ensure that no adverse air quality impacts results, and all emissions are controlled and monitored 24/7. Further detail on these measures can be found in Chapter 3 of the ES (Document Reference 6.1). The impact of emissions from REP have been assessed, using detailed dispersion modelling to identify maximum concentrations as well as concentrations at worst case receptors. A number of reasonable worst case assumptions were made regarding building size, stack height and emissions. In

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>the vehicle and this also accumulates on the doors and windows of my house, which is highly unusual.</p> <ul style="list-style-type: none"> The fumes emanating from your facility produce such a potent smell that it can be smelt all year round and even penetrates into my home. <p>It is pertinent to note that the above points are also accepted by numerous local residents. The above is a damning indictment of your existing facility which you have labelled as 'Clean'. If this is what your organisation has determined to be clean, then of course the residents of Belvedere and I have no trust or confidence, whatsoever, in your proposed 'Energy park'. What is more, the residents of Belvedere Ward and I, intend to seek a review of your current operating practices with the newly elected Labour councillors of the Belvedere Ward, and Environmental agency, as it appears that your operating practices, are in clear breach of Environmental protection legislation. In light of the forgoing, I vehemently reject your proposal.</p>		<p>addition, existing sources of pollution in the area (RRRF and Crossness Sewage Treatment Works) have been taken into account along with emissions from traffic where appropriate. Impacts at human health receptors are considered not significant for all pollutants. The impacts to terrestrial habitats are also considered Not Significant.</p> <p>The RRRF has been operating within its legal emission limits since becoming operational in 2011. The Applicant can confirm that there is no smoke emitted from the exhaust stacks of RRRF. However, water vapour plumes are sometimes visible.</p> <p>As described in Chapter 3 of the ES all areas receiving or handling waste at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to accept deliveries. Waste will be delivered in closed ISO containers, sheeted in bulk container vehicles or enclosed refuse collections vehicles.</p> <p>In addition, The Applicant advises individuals to report any experiences of odour to the Environmental Health Officer at London Borough of Bexley so the source can be identified and action taken.</p>
	18.06.18	30.07.18	<p>Air quality - Dust pollution, dust, debris – increasing allergies for people who suffer from asthma and sinus issues. How will you ensure that allergy sufferers are not affected?</p>	N	<p>Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment. The impact of emissions from REP have been assessed, using detailed dispersion modelling to identify maximum concentrations as well as concentrations at worst case receptors. A number of reasonable worst case assumptions were made regarding building size, stack height and emissions. In</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>addition, existing sources of pollution in the area (RRRF and Crossness Sewage Treatment Works) have been taken into account along with emissions from traffic where appropriate. Impacts at human health receptors are considered not significant for all pollutants.</p> <p>Furthermore, an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts air quality during construction.</p>
	18.06.18	30.07.18	<p>Local air quality, traffic and transport: 'waste energy' and 'anaerobic digestion' are the terms used in your leaflet. The obvious concern here is air quality and foul smell. This will drive people away as nobody wants to live near a waste unit and in turn has the opposite ideas of bringing people to the area via Cross Rail developments. Please ensure all comments are consider and put forward in your Consultation Report!</p>	N	<p>Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant air quality or odour effects from the operational phase of REP. In addition, impacts at human health receptors are considered not significant for all pollutants.</p>
	18.06.18	30.07.18	<p>Also, with regards to the food digestion plant, I believe that it will produce unpleasant stench and this combined with the sewage works next to it will make the already unpleasant smell unbearable.</p>		<p>As described in Chapter 3 of the ES (Document Reference 6.1) all areas receiving or handling waste and the anaerobic digestion facility at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to accept deliveries. Waste will be delivered in closed ISO containers, sheeted in bulk container vehicles or enclosed refuse collections vehicles. This helps to keep any dust and odour within the buildings.</p>
	18.06.18	30.07.18	<p>I am concerned about this proposed building for the following reasons:</p> <p>1. Increased issues with bad smell pollution – as existing concerns with strong smells that come from your existing building. How will you guarantee against this?</p>		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Whilst I'm not completely against an anaerobic digester, I'm actually rather concerned about the impact of increased traffic and odour that the transportation of huge amounts of food and green waste will have. You say that your operations are "odour free", I beg to differ. I often go for walks or bike rides along the river wall and on many occasions my excursions have coincided with your barges arriving loaded with London's waste. I can assure you the smell was pretty unpleasant. Even if you haven't received any complaints regarding bad smell it doesn't mean your operations are odourless.		Effects of the anaerobic digestion combustion are limited to the immediate vicinity of the REP site and there is no interaction (cumulative effects) with the emissions from the ERF as the impacts of emissions from the ERF are well below the levels of significance. Furthermore, The Environmental Permit Regulations set emission limits for combustion plant to be used for the generation of power from the Anaerobic Digestion facility. Chapter 7 of the ES (Document Reference 6.1) provides the emission limit values for gas engines.
	18.06.18	30.07.18	As I live in Aspen Green, Belvedere, I am very close to your expending project and the site that is already there. We have been suffering from the daily pollution that comes from the chimney and it is shocking and alarming to see the smoke coming out around 4.30am. I discuss very often with neighbours for the bad smell and the cough that affecting our health. Even, our white curtains become grey and need a wash very often, without mentioning that very often we prefer not to open our windows to avoid the bad smell, imagine when it is a hot day.		The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency. Emission filters and rigorous control mechanisms are incorporated within the design of the stack to ensure that no adverse air quality impacts results, and all emissions are controlled and monitored 24/7. Further detail on these measures can be found in Chapter 3 of the ES (Document Reference 6.1). The RRRF has been operating within its legal emission limits since becoming operational in 2011. The Applicant can confirm that there is no smoke emitted from the exhaust stacks of RRRF. However, water vapour plumes are sometimes visible. As described in Chapter 3 of the ES (Document Reference 6.1) all areas receiving or handling waste at REP would operate under negative air pressure which

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					ensures air is drawn into the facility when doors are opened to accept deliveries. Waste will be delivered in closed ISO containers, sheeted in bulk container vehicles or enclosed refuse collections vehicles. This helps to keep any dust and odour within the buildings.
Local Community	18.06.18	30.07.18	To whom it may concern, I'm the resident in Belvedere DA17 area, I can smell smoke and another other unpleasant odours almost everyday, sometimes I even cannot breath. I'm quite sure this area has been already severely polluted by the Belvedere Industrial's factory and facilities. I think the proposed energy park plan will add more pollution into this area. I'm not agree this proposal.	N	<p>Chapter 7 of the ES (Document Reference 6.1) explains that where baseline concentrations are affected by other local emission sources and the impacts of the ERF and Anaerobic Digestion combustion, the impact of the local industrial emissions has been modelled in assessing the air quality impact of the Proposed Development. That assessment concludes that there would be no likely significant air quality or odour effects from the operational phase of REP. In addition, impacts at human health receptors are considered not significant for all pollutants.</p> <p>The Applicant can confirm no undue odour impacts are expected and there have been no complaints received for the RRRF since it opened in 2011. The Applicant advises individuals to report any experiences of odour to the Environmental Health Officer at London Borough of Bexley so the source can be identified and action taken.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 2 – Please tell us your views on our proposed use of the River Thames					
Local Community	18.06.18	30.07.18	Will this generate more pollution , and noise?	N	<p>The Proposed Development has been subject to a full EIA. The results of this assessment are provided in the ES (Document Reference 6.1). This has considered all likely significant effects on the environment and nearest sensitive receptors, particularly local residents, as agreed during EIA scoping. Mitigation measures will be used as appropriate where they are necessary to limit impacts. As described in Chapter 3 of the ES (Document Reference 6.1) all areas receiving or handling waste at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to accept deliveries. Waste will be delivered in closed ISO containers, sheeted in bulk container vehicles or enclosed refuse collections vehicles. This helps to keep any dust and odour within the buildings.</p> <p>Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant odour effects from the operational phase of REP.</p> <p>In addition, whilst the effects of emissions from river traffic are not considered significant, options to reduce emissions further from the current fleet of tugs are being investigated by the Applicant.</p> <p>Furthermore, an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts during construction,</p>
	18.06.18	30.07.18	Environment will be huge effected, bad smelling all the time in this area, chemical reaction effected the air quality as river Thames will be the highway to transport wastes.		
	18.06.18	30.07.18	Will this generate more pollution, smell and noise?	N	

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					including, but not limited to, all oil and chemical storage tanks and areas where drums are stored will be surrounded by an impermeable bund and located away from watercourses in accordance with COSHH Regulations 2002 and the Control of Pollution (Oil Storage) Regulations 2015.
Question 3 – Please tell us your views about approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	Food and green waste in my opinion should go by River rather than by road. I am concerned about the air quality aspects as the area is already polluted as there is a lot of industry around here.	N	Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality impact assessment and concludes that there would be no likely significant air quality effects from the operational phase of the Proposed Development. The assessment takes into account the existing baseline and therefore the existing industry in the area. The operation of the Proposed Development will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency.
	18.06.18	30.07.18	Air quality is dealt with in the design of new plant – end product back to the atmosphere – mainly leaving steam.		A full air quality impact assessment has been undertaken and the findings are presented in Chapter 7 of the ES (Document Reference 6.1). The assessment concludes that the Proposed Development will not result in any likely significant environment effects in relation to air quality either as a standalone development or cumulatively with other developments, having regard to the design and proposed operation of REP and embedded mitigation.
	18.06.18	30.07.18	All efforts should be made to go above and beyond the current “acceptable levels” of air quality we’ve seen in recent years how quickly these things can change and for us local residents it is very important that our health is a priority. Investing in transport management to improve the surrounding area should also be looked at.		
	18.06.18	30.07.18	Air quality, noise pollution & transport management is at the heart of community concerns. The proper management of these to the extent that they must meet the acceptable requirement/levels are important. This should be punctual as part of consideration for this development		The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency. Emission filters and rigorous control mechanisms are incorporated within the design of the stack to ensure that no adverse

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Air quality is my concern, you cannot stop Di-oxins		<p>air quality impacts results, and all emissions are controlled and monitored 24/7. Further detail on these measures can be found in Chapter 3 of the ES.</p> <p>In addition, the Human Health Risk Assessment (Document Reference 6.3), appended to Chapter 7 of the Environmental Statement (Document Reference 6.1) has assessed the long term accumulation of dioxins and concludes that there will there will be no significant effects in relation to long term exposure to dioxins and metals.</p> <p>As described in Chapter 3 of the ES (Document Reference 6.1) all areas receiving or handling waste at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to accept deliveries. Waste will be delivered in closed ISO containers, sheeted in bulk container vehicles or enclosed refuse collections vehicles. This helps to keep any dust and odour within the buildings.</p> <p>REP will be ideally located to maximise the use of the River Thames and the Applicant's existing infrastructure therefore, the waste input ratio of 75% by river and 25% by road is being proposed. This will help to reduce the number of lorries being used to deliver waste, and therefore result in improved air quality, when compared with a facility just using road transportation.</p> <p>Further details of the Applicant's consideration of issues arising from the consultation on the theme of transportation are included in Chapter 6 of the ES (Document Reference 6.1).</p>
	18.06.18	30.07.18	Air quality seems to be taken care of, with negative principle.		
	18.06.18	30.07.18	It seems a sensible approach & the protection of our air quality seems good. Concerned about traffic in the construction phase.		
	18.06.18	30.07.18	As mentioned in point number one, your approach for the air quality , transport management and traffic tremendous. This: 1. The air quality is an on going issue for more than twenty five years. It is time to make it clean to avoid every time smells that pollute the environment of Thamesmead and suburbs. 2. Traffic by the ferry and black wall tunnel are others. 3. Therefore your traffic and transport management will modernise or regulate the areas!		
	18.06.18	30.07.18	Please do not use local roads to transport the rubbish. It is not acceptable to local residents who already suffer from poor air quality.		
	18.06.18	30.07.18	A resident of the bridge community air quality is very important to me and my family and I do appreciate every effort made to insure the air quality of the area is not negatively effected by the project.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Local residents are already subjected to poor air quality. In no way should this problem be exacerbated by a further incinerator. The nitrogen and sulphur deposition on the neighbouring nature reserve and areas on the north of the Thames are a major concern and must be reduced at all costs.	N	<p>Poor air quality in London is primarily associated with emissions from vehicular traffic and air quality is worst alongside busy roads. We have assessed the air quality effects during construction, operation and decommissioning of REP at appropriate roadside locations, and the effects are presented in Chapter 7 of the ES (Document Reference 6.1) for impacts on human health and terrestrial biodiversity. The effects of all relevant pollutants have been assessed, from all relevant sources; the assessment has taken into account emissions from REP as well as existing sources of pollution in the area (RRRF and Crossness Sewage Treatment Works) along with emissions from road and river traffic. Where applicable, the impacts of the development have been assessed against values set out in the Air Quality Strategy. Impacts at human health receptors are considered not significant for all pollutants. The impacts to terrestrial habitats are also considered Not Significant.</p> <p>Nitrogen and sulphur emissions from the stack of the ERF can lead to acid deposition and have the potential to impact the richness and diversity of ecological sites. In the assessment contained in Chapter 7 of the ES (Document Reference 6.1), the potential concentrations and deposition of air pollutants from REP have been assessed against the following environmental criteria; critical loads for nitrogen deposition and acid deposition, and critical levels for NO_x, SO₂, HF, and NH₃. Critical loads provide a threshold of pollutant levels at which point exceedance is likely to result in habitat damage. In this assessment, the results of emissions from REP have been compared to current baseline deposition levels. At the Locally</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					Designated sites, all of the PCs are less than 100% of the assessment level and therefore Not Significant.
	18.06.18	30.07.18	Your approach to the protection of air quality? From what I've read you don't seem to have one as you don't think you need to do much, you have already considered any impact of your operations "negligible"	N	<p>A full air quality impact assessment has been undertaken and the findings are presented in Chapter 7 of the ES (Document Reference 6.1). The assessment concludes that the Proposed Development will not result in any likely significant environment effects in relation to air quality either as a standalone development or cumulatively with other developments, having regard to the design and proposed operation of REP and embedded mitigation.</p> <p>The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency. Emission filters and rigorous control mechanisms are incorporated within the design of the stack to ensure that no adverse air quality impacts results, and all emissions are controlled and monitored 24/7. Further detail on these measures can be found in Chapter 3 of the ES (Document Reference 6.1).</p>
	18.06.18	30.07.18	We are concerned that digging up the A206 dual carriageway is going to cause havoc to an already very busy stretch of road. The council have already made things 100 times worse in installing the new traffic lights which has made the once free flowing traffic come almost to a standstill at peak times. This is going to impact on the local school and the surrounding residents producing more pollution and noise and more traffic disruption.	N	<p>A full EIA has been undertaken in respect of the Proposed Development and the findings are presented in the ES (Document Reference 6.1). This includes assessments of air quality in ES Chapter 7.</p> <p>No significant effects have been identified on air quality as a result of an increase in from road movements.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	I do not think that you have thoroughly thought this through. The spine road gets very busy at peak times, so there will be increased traffic delays and air pollution which you have not really addressed in your plans. You have not said enough about traffic and transport management.		
	18.06.18	30.07.18	I feel more reassured now that things have been explained to me. I had concerns that there would be bad smells as this has been a severe problem over the years and still is apparent at times. However, I believe this is nothing to do with Cory. I understand there may be an impact on traffic/development during construction phases. I expect this may cause some divided views in the community and may affect me too. I am assured this is temporary. i.e. just during construction phase.	N	The Applicant acknowledges these comments and confirms that the technologies used are designed to avoid emissions of odour. As with RRRF, all areas receiving or handling waste at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to accept deliveries. This helps to keep any dust and odour within the buildings. Furthermore Section 7.9 of the ES (Document Reference 6.1) considers the potential for odour impacts and identifies no significant effects.
	18.06.18	30.07.18	As mentioned in point number one, your approach for the air quality, transport management and traffic tremendous. This: 1. The air quality is an on going issue for more than twenty five years. It is time to make it clean to avoid every time smells that pollute the environment of Thamesmead and suburbs.		
Question 5 - Do you have any comments on the information presented in our Preliminary Environmental Information Report (PEIR)?					
Local Community	18.06.18	30.07.18	It would also incorporate battery storage there. Our local living environment will be huge effected, bad smelling all the time in this area, chemical reaction effected the air quality and our houses price will be dropped down by this	N	The Applicant confirms that the technologies used are designed to avoid emissions of odour. As with RRRF, all areas receiving or handling waste at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			propose, we will ask your compensation as you damage our local environment!		<p>accept deliveries. This helps to keep any dust and odour within the buildings.</p> <p>Furthermore Section 7.9 of the ES (Document Reference 6.1) considers the potential for odour impacts and identifies no significant effects. All delivery of waste would take place within the waste reception halls as for RRRF which is operated under negative pressure, with an inflow of air but no outflow of air. In addition, air from within the bunker area is used as combustion air, with odorous compounds being burnt. Therefore, the potential for odour impacts is considered to be Not Significant.</p> <p>The Applicant can confirm no undue odour impacts are expected and there have been no complaints received for the RRRF since it opened in 2011.</p>
	18.06.18	30.07.18	Poor - we are concerned about the proposed capacity of the new site. Being able to process up to 805,000 tonnes of non-recyclable waste, would - in addition to the capacity already at the existing site - make Belvedere home to by far the largest waste-to-energy incinerator in the UK. We are concerned about the particulate matter which would be released which has a serious detrimental impact on human health.	N	<p>The potential impact on human health from the operational emissions of REP have been assessed in Chapter 7 of the ES (Document Reference 6.1) and no significant impacts are anticipated. Furthermore, a Health Impact Assessment (Appendix K.1 of the ES, Document Reference 6.3) has been undertaken and concludes that effects on health outcomes will not be significant.</p> <p>Specifically, in respect of particulate matter, Chapter 7 of the ES (Document Reference 6.1) explains that the assessment of the Proposed Development on air quality concludes that total concentrations will be well below the objective value and the impacts from the operation of REP will be negligible.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 6 - Do you have any comments on the different options for the route of the electrical connection? (The options are labelled 1,1A,2A and 2B).					
	18.06.18	30.07.18	Please see above we are concerned that digging up the A206 is going to create more traffic chaos, pollution from stationary vehicles and noise. The issue is how long is the disruption going to last for? This dual carriageway is forever being dug up. The public wouldn't mind so much if the work was completed quickly and efficiently but some of the contractors let work drag on for months. The public don't want or need anymore upheaval this dual carriageway is congested enough at peak times.	N	<p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix K of the Transport Assessment (TA) (Document Reference 6.3)) has been submitted with the DCO application.</p> <p>There will be additional HGV trips associated with the construction and decommissioning of REP. Although the number of additional trips is not currently known, it is expected that on an annual average basis, the amount of construction HGV traffic will not be significant.</p> <p>In addition, an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts air quality during construction</p>
Local Community	18.06.18	30.07.18	The noise and pollution from the construction of your "park" will be bad enough, but God only knows what the routing of cable through the reserve will entail - the only certainly is the it will be extremely unpleasant and hugely adversely affect the reserve's wildlife which have already been subject to a pollution incident perpetrated by Thames Water which has closed the private part of the reserve for over 6 months!!	N	A full air quality impact assessment has been undertaken and the findings are presented in Chapter 7 of the ES (Document Reference 6.1). The assessment concludes that the Proposed Development will not result in any likely significant environment effects in relation to air quality either as a standalone development or cumulatively with other developments, having regard to the design and proposed operation of REP and embedded mitigation.

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts air quality during construction.
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	The further impact this will have on local residents who already have a high proportion of polluting industry in the immediate area.	N	A full air quality impact assessment has been undertaken and the findings are presented in Chapter 7 of the ES (Document Reference 6.1). The assessment takes into account the existing baseline and therefore the existing industry in the area. The assessment concludes that the Proposed Development will not result in any likely significant environment effects in relation to air quality either as a standalone development or cumulatively with other developments, having regard to the design and proposed operation of REP and embedded mitigation.
Question 9 – Any other comments					
Local Community	18.06.18	30.07.18	Although the figures for air quality etc. look good on paper now I do want Cory to abide by any future changes. Asbestos was great once and look what it has done since. Stay on top of or ever ahead of any future regulations which affects the local residents. As a result of air quality by the developments. As any future ailments appear Cory should be held responsible and offer financial support and medical support where needed.	N	Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality assessment undertaken and concludes that the impacts from operational emissions from REP will be Not Significant. The exhaust gas treatment process proposed for the Energy Park ensures that emissions of particulates and gases will be strictly controlled and comply with the Environment Agency's permitting system at all times. A draft Waste Incineration Directive BREF has been published (European Parliament, 2017). This document sets out current Best Available Techniques (BAT) for reducing pollution from waste incineration plants and

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					includes a number of BAT-AELs (Best Available Techniques - Air Emission Limits). Once finalised, the BAT-AELs would need to be incorporated into the Environmental Permit for the Proposed Development to be issued by the Environment Agency, which the Proposed Development must comply with at all time.
	18.06.18	30.07.18	I have lived in Belvedere for 16 years. I have experienced bad smells that have got better but still occur. This is important to me. I want the environment to be managed and I am very pleased to hear that the surroundings nature reserve will be protected. I am excited for community prospects for education – job opportunities etc. Thank you for this informative presentation.	N	As with the Applicant’s existing facility, all areas receiving of handling waste at REP would operate under negative air pressure with odour controlled and then eliminated in the non-recyclable ‘black bag’ waste combustion process. REP would handle food and green waste as well as ‘black bag’ waste. As described in Chapter 3 of the ES (Document Reference 6.1) all areas receiving or handling waste at REP would operate under negative air pressure which ensures air is drawn into the facility when doors are opened to accept deliveries. Waste will be delivered in closed ISO containers, sheeted in bulk container vehicles or enclosed refuse collections vehicles. This helps to keep any dust and odour within the buildings. Through integrating waste handling processes, the Applicant will ensure that any odour is captured in the same manner.

J.10 Noise and Vibration

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	The proposal appears to be a good idea as a way of re-using waste to generate energy. Impact on local community in terms of noise , lighting etc. needs to be taken into consideration when making final plans. I am certain however that the locals will be given preference when recruiting for workers to work in the facility (of course subject to qualification).	N	The Proposed Development has been subject to an EIA and the findings of this assessment are provided within the ES (Document Reference 6.1). This has considered all likely significant effects on the environment and nearest sensitive receptors and includes assessments of noise, air quality, lighting, and socio-economic impacts. Mitigation measures will be used as appropriate where they are necessary to limit impacts, including in relation to noise, and an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has been submitted with the DCO application, which the contractor will have to comply with when carrying out the construction of the Proposed Development. Chapter 8 of the ES (Document Reference 6.1) presents the findings of the noise assessment for the construction of the Main Site, and Electrical Connection, operation and effects to the nearest noise sensitive receptors and concludes that no likely significant effects have been identified.
	18.06.18	30.07.18	Will there be additional noise for the area?		
	18.06.18	30.07.18	There will be considerable upheaval during the building process, noise additional traffic, displacement soil and vegetation, let alone night time security lights which will impact on nocturnal creatures.		
	18.06.18	30.07.18	Noise pollution – how will you ensure that during building works, local residents are not affected by noise? Will we be compensated?		
	18.06.18	30.07.18	The cable route will cause much digging, noise & lorries in Erith?		
Question 2 - Please tell us your views on our proposed use of the River Thames					
Local Community	18.06.18	30.07.18	Will this generate more pollution, smell and noise ?	N	Chapter 8 of the ES (Document Reference 6.1) presents the findings of the noise assessment for the construction of the Main Site, and Electrical Connection, operation and effects to the nearest noise sensitive receptors and concludes that no likely significant effects
	18.06.18	30.07.18	Will this generate more pollution, and noise ?	N	

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					have been identified as arising as a result of the Proposed Development.
Question 3 – Please tell us your views about approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	Noise pollution is at the heart of community concerns. The proper management of these to the extent that they must meet the acceptable requirement/levels are important. This should be punctual as part of consideration for this development	N	<p>The Proposed Development has been subject to a full EIA. The results of this assessment are provided in the ES (Document Reference 6.1). This has considered all likely significant effects, including noise impacts on the environment and nearest sensitive receptors.</p> <p>No significant effects have been identified on or noise levels as a result of an increase in road movements.</p> <p>In relation to the potential for noise impacts due to construction of the Proposed Development, mitigation measures will be used as appropriate where they are necessary to limit impacts, including in relation to noise, and an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has been submitted with the DCO application, which the contractor will have to comply with when carrying out the construction of the Proposed Development.</p>
	18.06.18	30.07.18	We are concerned that digging up the A206 dual carriageway is going to cause havoc to an already very busy stretch of road. The council have already made things 100 times worse in installing the new traffic lights which has made the once free flowing traffic come almost to a standstill at peak times. This is going to impact on the local school and the surrounding residents producing more pollution and noise and more traffic disruption.		
Question 6 - Do you have any comments on the different options for the route of the electrical connection? (The options are labelled 1,1A,2A and 2B).					
Local Community	18.06.18	30.07.18	The noise and pollution from the construction of your "park" will be bad enough , but God only knows what the routing of cable through the reserve will entail - the only certainly is the it will be extremely unpleasant and hugely adversely affect the reserve's wildlife which have already been subject to a pollution incident perpetrated by Thames Water which has closed the private part of the reserve for over 6 months!!	N	<p>A noise assessment has been conducted which assesses the likely effects of the construction, operation and decommissioning of the Proposed Development on the noise and vibration climate of the area. The findings of this assessment are presented in Chapter 8 of the ES (Document Reference 6.1). No likely significant effects have been identified.</p> <p>An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					with the DCO application which includes measures to control the impacts noise and vibration during construction, which the contractor will have to comply with when carrying out the construction of the Proposed Development.
Local Community	18.06.18	30.07.18	Please see above we are concerned that digging up the A206 is going to create more traffic chaos, pollution from stationary vehicles and noise . The issue is how long is the disruption going to last for? This dual carriageway is forever being dug up. The public wouldn't mind so much if the work was completed quickly and efficiently but some of the contractors let work drag on for months. The public don't want or need anymore upheaval this dual carriageway is congested enough at peak times.	N	<p>The Proposed Development has been subject to a full EIA. The results of this assessment are provided in the ES (Document Reference 6.1). This has considered all likely significant effects, including noise impacts on the environment and nearest sensitive receptors. No significant effects have been identified on or noise levels as a result of an increase in road movements.</p> <p>A Construction Traffic Management Plan (CTMP) will be implemented in consultation with the relevant highways authorities in order to keep disruption from the construction works to a minimum. An Outline CTMP (Appendix K of the Transport Assessment (TA) (Document Reference 6.3)) has been submitted with the DCO application.</p> <p>In addition, an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts noise and vibration during construction, which the contractor will have to comply with when carrying out the construction of the Proposed Development.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	When the actual building starts any noise would be kept at a minimum especially when piling!!!	N	<p>Chapter 8 of the ES (Document Reference 6.1) presents the findings from the noise and vibration assessment. The assessment concludes that, with the use of appropriate mitigation, construction effects associated with the Proposed Development and electrical connection route are considered to be Not Significant.</p> <p>In the absence of a detailed construction plant methodology, which is not available at this stage, a conservative scenario which considers all construction activities occurring simultaneously has been assessed. This includes piling activities occurring at the REP site. The highest noise emission levels available in BS 5228 have been utilised to assess noise from piling and therefore provides a conservative assessment. These are associated with percussive piling.</p> <p>Furthermore, an outline Code of Construction Practice (CoCP) (Document Reference 7.5) has been submitted which will include details on the construction working hours. A final CoCP will be agreed with the relevant local planning authorities.</p>

J.11 Townscape and Visual

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	We agree that something has to be done about the growing mountain of waste that is produced. We think that the building is unsightly can't it be built to blend in more? Efficient operational and process requirements;	Y	<p>Throughout the design process, consideration has been given to a range of design options addressing the Design Principles. The decisions on these options have, where relevant, been informed by the environmental assessment work and consultation with stakeholders, and as a result the design has evolved throughout the pre-application process.</p> <p>Three indicative design solutions (flat building form, curved building form and stepped building form) for scale and massing were analysed as presented within Design and Access Statement (Document Reference 7.3). The stepped building form was chosen for:</p> <ul style="list-style-type: none"> • Maximising renewable energy outputs; • Responding to the context of neighboring land, building forms and property uses; • Mitigating anticipated visual effects; and • Requirements for safe routine maintenance and access throughout the life of the building. <p>The selected building form was based on an analysis of the three indicative design solutions identifying key issues and opportunities.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					There is the potential for further mitigation to reduce the visual effects of REP through the development of design principles and colour palette that are chosen. Further details are provided in the Design and Access Statement (Document Reference 7.3) and Design Principles (Document Reference 7.4).
Question 4 – Do you have any comments on the design of the proposed Energy Park and the factors (social, environmental and economic) that we have taken into account in our preferred design, including our preference for a stepped, rather than a curved or flat building form?					
Local Community	18.06.18	30.07.18	There is a visual impact but it is in keeping with the current skyline. I have no preference for design but would like to visit it sometime.	Y	The final findings of the Townscape and Visual Impact Assessment are presented in Chapter 9 of the ES (Document Reference 6.1).
	18.06.18	30.07.18	We think that the building could blend in more.		The operational phase of REP could give rise to Adverse townscape effects with a Moderate level of significance on Crossness Conservation Area; the Character, and Appearance of the REP Site; and on the landscape of Crossness Nature reserve marshland adjacent to the REP site, and scrubland habitats on the REP site. However, there is the potential for further mitigation to reduce the visual effects of REP through the development of design principles and colour palette that are chosen. Further details are provided in the Design and Access Statement (Document Reference 7.3) and Design Principles (Document Reference 7.4).
	18.06.18	30.07.18	My concern is the proximity to Crossness Nature Reserve and the visual impacts that it will have for visitors to the reserve. When you combine the cumulative effect with the two four-storey data storage facilities, the nature reserve will be hemmed in on all sides and lose the openness of a marsh landscape.	Y	Chapter 9 of the ES (Document Reference 6.1) sets out the Townscape and Visual Impact Assessment (TVIA) undertaken. The townscape and visual impacts arising from the Proposed Development have been assessed by undertaking field visits and producing photomontages of the Proposed Development from key viewpoints which have been agreed with statutory

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>To help this, my preferred design is the curved building to lessen the closed-in sensation. I strongly object to the stepped or flat building form. I would like a green wall to be considered for the south-facing wall to soften the visual impact whilst simultaneously providing habitat, otherwise a green-coloured building/wall, or even a nod to the surrounding wildlife by providing some kind of sculptural effect or wildlife mural that recognises and acknowledges the surrounding landscape and its wildlife.</p> <p>Due to the loss of views towards the river as a result of this development, perhaps Cory would like to compensate this loss by providing a bird hide/wildlife viewing screen immediately south of the Energy Park footprint, which will provide views of the wildlife-rich West Paddock on the nature reserve. This paddock is the most popular part of the nature reserve as it is of a marshland community with breeding Lapwing and other wetland species of interest, however views towards the back of the paddock are not possible from the nature reserve. Perhaps Cory could provide this by way of compensation for having to look at the back of a very large imposing building.</p> <p>I also think that green roofs should be explored. If the main incinerator is unable to accommodate this due to the presence of photovoltaic panels, then perhaps some of the smaller buildings (sub stations etc) can accommodate some living roofs for wildlife.</p>		<p>consultees, including; Royal Borough of Greenwich, London Borough of Bexley and Bexley Natural Environment Forum.</p> <p>The TVIA concludes that there is the potential that from certain view locations, the REP site, Main Temporary Construction Compounds and Electrical Connection could give rise to visual effects of Moderate levels of significance. The TVIA also concludes that the operational phase of REP could give rise to townscape effects with a Moderate level of significance on Crossness Conservation Area; the Character, and Appearance of the REP Site; and on the landscape of Crossness Nature reserve marshland adjacent to the REP site, and scrubland habitats on the REP site. However, there is the potential for further mitigation to reduce the townscape and visual effects though the development of design principles and colour palette that are chosen.</p> <p>The TVIA also considered the cumulative visual and townscape effects from other developments. No significant effects were identified, except for an adverse cumulative visual effect of moderate significance from Viewpoints VP2,3,4 (Public Rights of Way at Crossness Nature Reserve) and Lesnes Abbey.</p> <p>In addition, green roofs have been considered as part of development of the design however, using the roofs to maximise solar power generation has been prioritised with biodiversity enhancement and mitigation managed through other solutions.</p>
	18.06.18	30.07.18	The size and shape of this “stepped” proposal will almost complete the boxing in of the Crossness Local Nature	Y	The evolution of the overall design and form of the building is set out in the Design and Access Statement

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>Reserve on three sides. Once the Data Centre is completed, views from the nature reserve and the bird hide will be severely obstructed; the REP will further and considerably reduce views out to the River. The Cory RRF at least did mirror the design of the TW incinerator. To put another, ugly set of boxes on the riverside will further demonstrate the lack of imagination and only mirror all the other ugly boxes along the waterfront eastwards. (See also comments under your question 5 below).</p>		<p>(Document Reference 7.3). A Townscape and Visual Impact (TVIA) has been undertaken and included in Chapter 9 of the ES (Document Reference 6.1) which considers views from Crossness LNR (see viewpoints 2, 3 and 4).</p> <p>The addition of the Proposed Development will result in an adverse cumulative combined visual effect which is a Moderate level of significance (which is significant) during construction and on operation. It is also relevant to consider that any development on the REP site would have an effect on townscape character and views due to the current absence of permanent buildings on this land.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and has been developed following a consideration of the environmental and other constraints of the site, as explained in the Design and Access Statement (Document Reference).</p> <p>No further mitigation or enhancement is considered necessary in addition to the design process that will be progressed in accordance with Design Principles (Document Reference 7.4). This will include design development of colours and materials in context to the surroundings and in line with Context Colour Palettes, details of this are set out within the Design and Access Statement (Document Reference 7.3).</p>

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 5 – Do you have any comments on the information presented in our Preliminary Environmental Information Report (PEIR)?					
Local Community			<p>Page 20 discusses “potential visual receptors.....” but makes no specific mention of the Nature reserve users where over 300 “Friends” and others regularly enjoy the quiet location and current landscape views (to be thwarted by the Data Centre). The paragraph does go onto suggest “moderate” “significant townscape effects on the Crossness Conservation area, character and appearance of the site” As a regular user I can say that the intrusion of another structure (of any design) is unacceptable.</p> <p>The potential for contamination of surface water entering Great Breach etc....states “effects considered negligible” – well, define “potential” – any pollution/contamination would be disastrous and costly to clean up so cannot possibly be considered negligible</p> <p>Chapter 9 Townscape and visual impact Page 40 conceded riverside routes will be more shaded with less open views between river and marshland but with “interesting industrial features” (you are kidding aren’t you? Do we need more “industrial features”). The nature reserve will be almost totally hemmed in by high buildings on north and east side – what mitigation does Cory intend? A new bird hide/access route to the north of the West Paddock giving closer/protected views of the flooded meadows might be one action. Developing the unique habitat of the west paddock to a wider area another.</p>		<p>The Applicant acknowledges this response and notes that some viewpoints (viewpoint 2 - Public Right of Way between crossness Nature Reserve and Thames Path National Trail and viewpoint 3 - Public Right of Way in Crossness Nature Reserve) were not able to be assessed for the purpose of the PEIR. These viewpoints have now been assessed and the findings from the final Townscape and Visual Impact Assessment (TVIA) are presented in Chapter 9 of the ES (Document Reference 6.1). The assessment concludes that the visual impact from views on the Thames Path, near Crossness Conservation Area, will be of a Moderate significant effect. Section 9.11 of the ES outlines further mitigation measures that are being considered to reduce the significance of effect.</p> <p>In addition, the cumulative effect with the Data Centre and Savills Bus Depot, Ind. & Offices will intensify the existing land use and increase the size and scale of built form in this area. These developments are smaller than REP though and therefore on balance it is considered that there will be a Slight adverse cumulative townscape effect during construction and operation which has a Minor level of significance and is therefore ‘not significant’.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and has been developed following a consideration of the environmental and other constraints of the site, as</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>explained in the Design and Access Statement (Document Reference (</p> <p>No further mitigation or enhancement is considered necessary in addition to the design process that will be progressed in accordance with Design Principles (Document Reference 7.4). This will include design development of colours and materials in context to the surroundings and in line with Context Colour Palettes, details of this are set out within the Design and Access Statement (Document Reference 7.3).</p>

J.12 Terrestrial Biodiversity

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	What about protecting the voles, rabbits, bats, birds?	Y	<p>Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity. This specifically included consideration of the impacts of all stages of the Proposed Development on the Crossness Local Nature Reserve (LNR).</p> <p>There are no significant effects on the LNR from the REP Site, Main Temporary Construction Compounds and Data Centre site in terms of direct land take. However, there is potential for indirect impacts during construction from noise and visual disturbance, dust generation and pollution. These potential effects are assessed in Chapter 11.</p> <p>The northern section of the Electrical Connection route option 1 runs from the south western corner of the REP site down an existing bridleway to join the A2016 Eastern Way. The bridleway falls within the Crossness LNR and Erith Marshes SINC (Crossness LNR covers part of the same area designated as Erith Marshes SINC). This will result in short-term temporary habitat loss along the line of the bridleway, as well as disturbance to species within and adjacent to the working area. Measures to minimise impacts from installation of the Electrical Connection will be set out within the OBLMS (Document Reference 7.6).</p>
	18.06.18	30.07.18	I welcome any project that reduces carbon emissions and provide creative solutions to our waste disposal and recycling challenge. The project has to take account of the local environment and ecology including Crossness nature reserve and breeding birds, and minimise impact on this wonderful resource, through the route of the cable and the design of the facility. The impact on the local community needs to be mitigated through careful consideration of the health hazards in relation to air quality, and the impact of the transport of waste and energy to and from the facility.		
	18.06.18	30.07.18	I agree that there needs to be a sustainable approach to dealing with waste and your plans seem good. However, I have concerns about the impact of the site on the wildlife of your building site and the laying of cables; the cleanliness of the River Thames; the impact on traffic in the area as you say that you will be bringing lorries in as well and the air pollution the site will generate.		
	18.06.18	30.07.18	No mitigation for the nature reserve has been currently suggested, though I believe that mitigation options are still being explored.		
18.06.18	30.07.18	The effect on the wildlife on the proposed plan would be devastating. Is this not to be considered. Once we have lost the wildlife we will not get it back. The			

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			proposed area is a haven for all kinds of wildfowl and predators voles and foxes. Why cannot west London boroughs build an incinerator in West London to deal with their own waste. Bexley borough should hang its head in shame to even consider such a proposal yet alone be considering giving consent. Whatever financial gain for Bexley if this proposal goes ahead will just go into the coffers where the average person will find it difficult to see any benefit.		Therefore, effects to these designated areas of County/Metropolitan and Local conservation importance will be Not Significant. All electrical connection route options are still being considered and will be determined through ongoing engineering investigations. A final route will be selected in consultation with UKPN. It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.
	18.06.18	30.07.18	I understand that when Thames Water built the sludge powered generator at Crossness Sewage Treatment Works, it was required (as part of the planning process) to put aside a 20ha nature reserve (Crossness Nature Reserve) fund it, enhance it, staff it, provide community benefits, education visits and ecological records. The Council recognised the impact of building at this location and had the foresight to make this biodiversity off-setting a condition of the planning application. There needs to be a similar arrangement for the energy park. Please keep me informed of decisions and developments.		Standard measures to avoid impacts to breeding birds and other species from construction activities, and to enhance retained habitats where required, will be included within the OBLMS (Document Reference 7.6).
	18.06.18	30.07.18	I am very disappointed to hear of these Proposals. My Concerns relate to the Impact on the adjacent Crossness Nature Reserve (a Site of Metropolitan Importance for Nature Conservation). The Development, if it comes to fruition, will, in conjunction with actual/proposed developments in nearby Norman Road, further hem the Reserve in and surely discourage Migrant Visitors viz. Wheaters, Whinchats &c. The proposed 'Park' runs alongside the Reserve's, West Paddock, where Lapwings are known to have bred earlier this year. The Disruption caused by Building Works, viz. Piling Activities, the use of Cranes, Diggers, Dumpers &c. will discourage		In addition, operational impacts to other species or species groups such as reptiles, invertebrates, such as the Shril Carder Bee or water voles are unlikely but could occur from pollution incidents or other unplanned events were they likely to occur. However, the REP site will be managed in accordance with measures set out in the environmental permit and pollution incidents are considered unlikely. Impacts to water voles will be avoided through embedded mitigation which includes, ensuring a 5m offset of all construction work from ditches which support water vole. Therefore, no impacts to these species are anticipated.

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>any such breeding (and much else) whilst the Work is on-going.</p> <p>Of particular concern are the Proposals to route Cables through the Nature Reserve itself rather than alongside Norman Road: this will be very disruptive, severely inconvenience visitors to the Nature Reserve and possibly adversely affect Water Vole populations (the Water Vole is Protected in the UK under the Wildlife and Countryside Act, 1981 and is a Priority Species under the UK Post-2010 Biodiversity Framework). If the Proposals proceed, I think it absolutely essential that the Cable be routed along Norman Road. The areas under review provide a Home for the Shrill Carder Bee *. According to the Bumblebee Conservation Trust, ‘the distribution of Shrill carder bee has declined dramatically in the last century, making it one of the UK’s rarest bumblebees. The Shrill carder bee is now only found in seven areas in southern England and Wales. These fragmented populations are found in Kent, Essex, Somerset, Wiltshire, Gwent, Glamorgan and Pembrokeshire. It is a priority species for conservation in England and Wales’.</p> <p>* Actual and Proposed developments alongside Norman Road, including the proposed Riverside Energy Park and Cory’s approved Four-Storey Data Storage Facilities, threaten the survival of the Shrill Carder Bee in the general area.</p>		<p>It should be noted that foxes were not recorded during the baseline surveys and are not considered rare or otherwise notable when undertaking ecological assessments.</p> <p>An Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p> <p>In addition, a biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments.</p> <p>The biodiversity metric calculation used by the Envirobank is based on the old Defra metric.</p> <p>Options for offsetting will be determined to local biodiversity priorities, initially through discussion with the LBB and then with third party landowners.</p>
	18.06.18	30.07.18	2) NO to “cable route 1”, I don’t understand how you could be so arrogant as to believe you have the right to destroy	N	The preferred route of the Electrical Connection from the REP site is along Norman Road. However, if the route along Norman Route is determined not to be

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			the nature reserve and consider the impact of your actions on the local ecology “negligible”.		feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately, with appropriate mitigation measures identified accordingly. There are no significant effects on the LNR from the REP Site, Main Temporary Construction Compounds and Data Centre site in terms of direct land take. However, there is potential for indirect impacts during construction from noise and visual disturbance, dust generation and pollution. These potential effects are assessed in Chapter 11
	18.06.18	30.07.18	I also have concerns regarding the impact of Lighting (both during Construction and Operation) on Species such as Bats and Barn Owls (both of which are present in the area). As I understand it, Low-Level Lighting should be directed downwards and Blue-Spectrum Lighting is to be discouraged since, as I understand it, it adversely impacts on Bats. Assuming the Development does go ahead it is important that ‘Ecological Compensation’ be provided in Mitigation. As I understand it, Thames Water were required, when they sought permission to build the Sludge Powered Generator within the Grounds of the Crossness Sewage Treatment Works, to Fund and Develop a 20 Hectare Nature Reserve viz. the existing Crossness Nature Reserve. They were also required to Staff it, provide Community Benefits &c. These obligations have been fulfilled. Something similar perhaps?	N	Sections 11.8 and 11.9 of the ES (Document Reference 6.1) sets out the potential effects of artificial lighting on light sensitive species. No likely significant effects from light intrusion, sky glow or glare are anticipated during the construction stage and an Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which includes measures to control the impacts from lighting. Light spill from the operation of the REP site could affect adjacent designated areas, however, an Outline Lighting Strategy (Appendix K.3 of Chapter 15 the ES (Document Reference 6.3), has been produced which establishes the minimum lighting levels required to construct and operate a safe, secure and energy efficient development, assesses the potential effects of exterior lighting required for REP on light sensitive receptors, and establishes design objectives for the
	18.06.18	30.07.18	There will be considerable upheaval during the building process, noise additional traffic, displacement soil and vegetation, let alone night time security lights which will impact on nocturnal creatures.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>lighting design to minimise the effects or obtrusive light to within guideline levels.</p> <p>A biodiversity metric calculation is being undertaken by the Environment Bank to enable a biodiversity balance to be determined and to provide evidence of overall net gain in accordance with policy and consultee comments.</p> <p>The biodiversity metric calculation used by the Envirobank is based on the old Defra metric.</p> <p>Options for offsetting will be determined to local biodiversity priorities, initially through discussion with the LBB and then with third party landowners.</p>
	18.06.18	30.07.18	'Ecological Compensation', be it in the development and/or maintenance of Wildlife Friendly Areas or any other Form, will be of Benefit both now and in the Future. In Summary: to my mind, the Proposals, should they go ahead, will Severely and Adversely affect the Crossness Nature Reserve. And it is essential that 'Ecological Compensation' be provided.	Y	<p>Due to the limited area of the REP site, it is not possible to avoid or mitigate all impacts arising through temporary and permanent loss of habitats. Compensation, or biodiversity offsetting, would be provided to offset residual effects resulting from the loss of habitats within the REP site. This will be delivered through a financial contribution to the Environment Bank with a legal agreement for contribution towards enhancement of habitats outside the Application Boundary.</p>
	18.06.18	30.07.18	<p>Its impact on Crossness Nature Reserve, an area which is a haven for Britain's fastest declining mammal species (the water vole), Britain's rarest bee (the Shril Carder Bee) and several species of birds (heron, skylark, kestrel, barn owls and others) is something which I and anyone else who loves the reserve are absolutely dreading.</p> <p>The fact that you appear to be getting away with this without any ecological compensation (Thames Water had to create the Reserve on building its waste water treatment centre) is also diabolical.</p>		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	I am a member of the Friends of Crossness Nature Reserve and have strong reservations about the use of an easy route for cabling by using a public footpath. Not only will this affect our access while the footpath is closed for installation of the cable but the impact on local wildlife as the path is between two ditches used by water voles which are already in significant decline. I strongly urge you to use Norman Road for the cabling route to minimise the impact on the nature reserve and those who access it.	N	<p>The preferred route of the Electrical Connection from the REP site is along Norman Road. However, if the route along Norman Route is determined not to be feasible, there is a possibility that the alternative route along the bridleway through the Crossness Local Nature Reserve (LNR) may be selected. Therefore, both options are assessed separately within Chapter 11 of the ES (Document Reference 6.1), with appropriate mitigation measures identified accordingly.</p> <p>Section 11.8 of Chapter 11 of the Environmental Statement (Document Reference 6.1) sets out the mitigation measures that will be employed to mitigate effects to water voles during construction. The measures include, maintaining an offset of at least 5m from the top of the ditch bank along Norman Road and other measures secured in the Outline Lighting Strategy (Appendix K.3 of Chapter 15 the ES (Document Reference 6.3), management of surface water and through the measures secured in the Outline Biodiversity and Landscape Mitigation Strategy (Document Reference 7.6).</p>
	18.06.18	30.07.18	In general it is difficult to understand why Bexley need to have a waste recycling plant to recycle waste mainly from other boroughs. How is that helping those boroughs to take responsibility for their waste and focus more on recycling than just chucking it away. While they may pay for the privilege of disposing waste in Bexley it is very difficult to quantify the cost of the impact on where the incinerator is due to be placed so close to a nature reserve and Site of Metropolitan Importance for Nature Conservation.	N	Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity, including on Crossness LNR. That assessment concluded that there would be no significant effects on the LNR from the REP Site, Main Temporary Construction Compounds and Data Centre site in terms of direct land take, albeit, there is potential for indirect impacts during construction from noise and visual disturbance, dust generation and pollution during

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>construction. These effects are assessed in Chapter 11 and, taking account of mitigation measures proposed in the Outline Biodiversity and Landscape Mitigation Strategy (Document Reference 7.6), the assessment concludes that there will be no likely significant effects from the construction of the REP Site and Main Temporary Construction Compounds to designated sites.</p> <p>The northern section of Electrical Connection route option 1 runs from the south western corner of the REP site down an existing bridleway to join the A2016 Eastern Way. The bridleway falls within the Crossness LNR and Erith Marshes SINC (Crossness LNR covers part of the same area designated as Erith Marshes SINC). This will result in short-term temporary habitat loss along the line of the bridleway, as well as disturbance to species within and adjacent the working area. Measures to minimise impacts from installation are set out within the OBLMS (Document Reference 7.6). Therefore, effects to these designated areas of County/Metropolitan and Local conservation importance will be Not Significant.</p>
Question 2 – Please tell us your views on our proposed use of the River Thames					
Local Community	18.06.18	30.07.18	I think it is excessive. Local authorities and ecology groups have worked hard over the past 20 years to encourage wildlife and fish back to the river. The use of tugs is going to disturb the wildlife. There is very likely to be a discharge of diesel into the river by the tugs, as well as air pollution from their exhausts.	N	The requirement for a full marine biodiversity assessment has been scoped out, and no fish or mammal surveys will be required to inform the EIA. This was due to further refinement of the Proposed Development and likely construction methodologies, which removed the need for intrusive works in the River

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	In recent years up to eight Common/Harbour (and occasionally grey) seals have been seen feeding and loafing along this stretch of the River (but never, in my experience, seen by the Cory RRRF pier). Increased river traffic close to shore will impact on these animals.		<p>Thames, greatly reducing the potential to give rise to significant adverse effects on the marine environment. This was set out in <i>REP: removal of river works and amend scope of EIA Technical Note</i> (circulated to consultees on 23rd March 2018) and agreed with LBB (email from LBB Planning Officer 26/09/2018).</p> <p>Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from the Proposed Development. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i></p> <p>In line with the Port of London Authority’s Thames Vision (2015), the Proposed Development would generate an increase in freight movements on the River Thames. A NRA, to consider the impacts of the project on the safety of navigation, has been developed as part of the Environmental Statement supporting the REP Development Consent Order application.</p> <p>Following changes to the design, the requirement for a full marine biodiversity assessment was scoped out, and of the EIA. This was set out in <i>REP: removal of river works and amend scope of EIA Technical Note</i> (circulated to consultees on 23rd March 2018) and</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>agreed with LBB (email from LBB Planning Officer 26/09/2018).</p> <p>In addition, whilst the effects of emissions from river traffic are not considered significant, options to reduce emissions from the current fleet of tugs are being investigated by the Applicant.</p>
	18.06.18	30.07.18	No mitigation for the nature reserve has been currently suggested, though I believe that mitigation options are still being explored.	Y	<p>Due to the limited physical area of the REP site, it is not possible to avoid or mitigate all impacts through temporary and permanent loss of habitats. Compensation, or biodiversity offsetting, would be provided to offset residual effects resulting from the loss of habitats within the REP site. This will be delivered through a financial contribution to the Environment Bank with a legal agreement for contribution towards enhancement of habitats outside the Application Boundary.</p> <p>In addition, an Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p>
	18.06.18	30.07.18	This section of the River Thames is nationally and internationally important for birdlife feeding both on the river and more importantly the foreshore immediately adjacent to the proposed site. It is noticeable that feeding wildfowl are now generally absent or in very small numbers around the pier/jetty of the existing incinerator (RRRF) given the noise from trucks and increased barge	N	<p>Chapter 11 of the ES (Document Reference 6.1) considers the potential impacts during the construction and decommissioning and the operation of the Proposed Development on terrestrial biodiversity. Paragraph 11.9.58 of the ES (Document Reference 6.1) sets out that potential impacts on passage (spring/autumn) or over-wintering waterbird species associated with the intertidal areas adjacent to the REP</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>movements. However, the foreshore surrounding the Thames Water incinerator (with no pier/river traffic) has significant numbers of feeding and roosting waders (Redshank, Black-tailed godwit etc.) and ducks (e.g. Gadwall, Teal, Shoveler and Shelduck) amongst many other species. Whilst there is no plan for extra jetty/pier the increased river traffic (and holding/waiting areas for the barges) does impose increased pressure on the available space for all these species.</p>		<p>site as a result of the creation of the Electrical Connection route is considered unlikely due to the limited nature of the connection route works and the separation of the intertidal areas used by birds and the connection route locations. Any effects to passage or overwintering waterbirds of County/Metropolitan conservation importance will be Not Significant. Full surveys results, which includes Redshank, Black-tailed godwit etc.) and ducks (e.g. Gadwall, Teal, Shoveler and Shelduck can be viewed in Appendix G.5 of the ES (Document Reference 6.1).</p> <p>Following changes to the design, the requirement for a full marine biodiversity assessment was scoped out, and of the EIA. This was set out in REP: removal of river works and amend scope of EIA Technical Note (circulated to consultees on 23rd March 2018) and agreed with LBB (email from LBB Planning Officer 26/09/2018).</p>
Question 3 – Please tell us your views about approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	<p>No mitigation for the nature reserve has been currently suggested, though I believe that mitigation options are still being explored.</p>	Y	<p>Due to the limited area of the REP site, it is not possible to avoid or mitigate all impacts through temporary and permanent loss of habitats. Compensation, or biodiversity offsetting, would be provided to offset residual effects resulting from the loss of habitats within the REP site. This will be delivered through a financial contribution to the Environment Bank with a legal agreement for contribution towards enhancement of habitats outside the Application Boundary.</p> <p>In addition, an Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.
Question 4 – Do you have any comments on the design of the proposed Energy Park and the factors (social, environmental and economic) that we have taken into account in our preferred design, including our preference for a stepped, rather than a curved or flat building form?					
Local Community	18.06.18	30.07.18	<p>My concern is the proximity to Crossness Nature Reserve and the visual impacts that it will have for visitors to the reserve. When you combine the cumulative effect with the two four-storey data storage facilities, the nature reserve will be hemmed in on all sides and lose the openness of a marsh landscape.</p> <p>To help this, my preferred design is the curved building to lessen the closed-in sensation. I strongly object to the stepped or flat building form. I would like a green wall to be considered for the south-facing wall to soften the visual impact whilst simultaneously providing habitat, otherwise a green-coloured building/wall, or even a nod to the surrounding wildlife by providing some kind of sculptural effect or wildlife mural that recognises and acknowledges the surrounding landscape and its wildlife.</p> <p>Due to the loss of views towards the river as a result of this development, perhaps Cory would like to compensate this loss by providing a bird hide/wildlife viewing screen immediately south of the Energy Park footprint, which will provide views of the wildlife-rich West Paddock on the nature reserve. This paddock is the most popular part of the nature reserve as it is of a marshland community with breeding Lapwing and other wetland species of interest,</p>	Y	<p>Due to the limited area of the REP site, it is not possible to avoid or mitigate all impacts through temporary and permanent loss of habitats. Compensation, or biodiversity offsetting, would be provided to offset residual effects resulting from the loss of habitats within the REP site. This will be delivered through a financial contribution to the Environment Bank with a legal agreement for contribution towards enhancement of habitats outside the Application Boundary.</p> <p>In addition, green roofs have been considered as part of development of the design however, using the roofs to maximise solar power generation has been prioritised with biodiversity enhancement and mitigation managed through other solutions.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>however views towards the back of the paddock are not possible from the nature reserve. Perhaps Cory could provide this by way of compensation for having to look at the back of a very large imposing building.</p> <p>I also think that green roofs should be explored. If the main incinerator is unable to accommodate this due to the presence of photovoltaic panels, then perhaps some of the smaller buildings (sub stations etc) can accommodate some living roofs for wildlife.</p> <p>The footprint for this development may be on existing hard-standing, but combined with the habitat loss resulting from the data storage facilities, I really feel very strongly about mitigation. I would like to see some off-site compensation whereby other hard-standing areas are converted to wildlife-rich habitat.</p>		
Local Community	18.06.18	30.07.18	<p>The design of the "park" must have minimal impact on Crossness Nature Reserve. For this reason I would prefer a curved building similar in shape to the existing monstrosity. There should be some mitigation perhaps in the form of a wildlife mural or a green wall or anything which will minimise the impact on the reserve and existing views to the river.</p> <p>The existing manager of the Reserve has also suggested a bird hide or viewing platform south of your new incinerator or even a new wetland habitat.</p> <p>You must also consider the impact on bat and owl populations of new lighting, ensuring that lighting is not 24 hours and downward facing.</p>	Y	<p>An Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (Document Reference 7.6) has been submitted with the DCO application which addresses protection and appropriate working measures which will be required during construction, operation and decommissioning to protect the habitats and species within these nearby areas.</p> <p>Further ecological mitigation may be identified in the final BLMS, which will be secured through a DCO Requirement, and will be substantially in accordance with the OBLMS(Document Reference 7.6).</p> <p>As part of Chapter 11 of the ES (Document Reference 6.1), embedded mitigation measures are identified, this includes, but not limited to, an Outline Lighting Strategy</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					(Appendix K.3 of Chapter 15 the ES (Document Reference 6.3)), has been produced which establishes the minimum lighting levels required to construct and operate a safe, secure and energy efficient development, assesses the potential effects of exterior lighting required for REP on light sensitive receptors, and establishes design objectives for the lighting design to minimise the effects or obtrusive light to within guideline levels.
Question 5 – Do you have any comments on the information presented in our Preliminary Environmental Information Report (PEIR)?					
Local Community	18.06.18	30.07.18	<p>Page 20 discusses “potential visual receptors.....” but makes no specific mention of the Nature reserve users where over 300 “Friends” and others regularly enjoy the quiet location and current landscape views (to be thwarted by the Data Centre). The paragraph does go onto suggest “moderate” “significant townscape effects on the Crossness Conservation area, character and appearance of the site” As a regular user I can say that the intrusion of another structure (of any design) is unacceptable.</p> <p>The potential for contamination of surface water entering Great Breach etc....states “effects considered negligible” – well, define “potential” – any pollution/contamination would be disastrous and costly to clean up so cannot possibly be considered negligible</p> <p>Chapter 9 Townscape and visual impact Page 40 conceded riverside routes will be more shaded with less open views between river and marshland but with “interesting industrial features” (you are kidding aren’t</p>	N	Chapter 11 of the ES (Document Reference 6.1) provides the full assessment of effects from construction and operation of REP on terrestrial biodiversity. The assessment takes into account the results of modelling of emissions from the ERF Stack during operation, noise monitoring and modelling, and other predicted environmental changes such as surface water and shading which have the potential to have ecological effects. Sections 11.8 and 11.9 of the ES set out the potential effects of artificial lighting on light sensitive species. Chapter 11 of the ES (Document Reference 6.1) concludes that the impacts on designated habitats and species would be Minor significant or Not Significant.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>you? Do we need more “industrial features”). The nature reserve will be almost totally hemmed in by high buildings on north and east side – what mitigation does Cory intend? A new bird hide/access route to the north of the West Paddock giving closer/protected views of the flooded meadows might be one action. Developing the unique habitat of the west paddock to a wider area another.</p>		

J.13 Hydrology, Flood Risk and Water Resources

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	Water in Thames might be affected?	N	<p>Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from the Proposed Development. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes:</p> <p><i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i></p>
	18.06.18	30.07.18	<p>I agree that there needs to be a sustainable approach to dealing with waste and your plans seem good. However, I have concerns about the impact of the site on the wildlife of your building site and the laying of cables; the cleanliness of the River Thames; the impact on traffic in the area as you say that you will be bringing lorries in as well and the air pollution the site will generate.</p>		
	18.06.18	30.07.18	<p>It is to let you know that We the people of Belvedere, Erith say NO to the garbage processing plant. You have no right to further contaminate the river, the environment and our blood. Those who took their money to allow for such a disgrace should quit their temporary seats they occupy or if they believe it is such a great idea, they might want to have the 'environmental bomb' built in their garden or just outside the Parliament and bring the London Eye to Belvedere instead. May you all prosper and live in good health.</p>		
Question 2 – Please tell us your views on our proposed use of the River Thames					
Local Community	18.06.18	30.07.18	I think it will cause more pollution on River Thames.	N	<p>Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from the Proposed Development. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes:</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p><i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i></p>

J.14 Socio Economics and Community Impact

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	As a resident of the bridge community and stakeholder of the riverside energy project I was personally interested in the social impact from the creation of jobs . I am an electrical engineer with an advanced apprenticeship in power engineering and a HNC in electrical engineering behind me and I think I could greatly contribute to a project like this. I am currently employed by National Grid. However a project like this is very interesting to me and shares the direction I wish to take my career. Please feel free to keep me updated.	N	Proposed Development will create a further c.85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. These job opportunities will be advertised to the local community.
Question 5 - Do you have any comments on the information presented in our Preliminary Environmental Information Report (PIER)?					
Local Community	18.06.18	30.07.18	It would also incorporate battery storage there. Our local living environment will be huge effected, bad smelling all the time in this area, chemical reaction effected the air quality and our houses price will be dropped down by this propose , we will ask your compensation as you damage our local environment!	N	There is no proven link between energy generation development and a decline in property prices. The location is considered suitable as it maximises the use of the River Thames and existing infrastructure.
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals					
Local Community	18.06.18	30.07.18	To get full community support in this initial stage and in the future, up to date communication via centres like churches, temples, schools leisure centres etc. should be made available including progress clarity. Moreover, Cory should be seen as prioritising the local communities in terms of employment, procurement & supplies.	N	The Applicant will continue to inform the local community about the progression of the REP DCO application. Updates will be posted on the Riverside Energy Park website (https://riversideenergypark.com/) and twitter (@CoryEnergy). REP will create a further c. 85 new jobs with apprenticeship opportunities in engineering, river
	18.06.18	30.07.18	Employing local community employees first.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>logistics and business management and will require a workforce in excess of 6,000 people over the construction period, a real benefit to the local economy. As detailed in Section 14.12 of the ES (Document Reference 6.1), the Applicant is committed to generating local economic benefit from the Proposed Development and has a preference to recruit locally where possible. These job opportunities will be advertised to the local community.</p> <p>Furthermore, as well as creating and supporting jobs, the Applicant will engage with local schools, create apprenticeships and back the Industrial Cadets programme. The Applicant is also an active member of the Belvedere Community Forum and attends their meetings to update members.</p>
Question 3 – Please tell us your views about approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	I am not sure what the impact will be on local residents and I am concerned about it.	N	<p>The Proposed Development has been subject to a full Environmental Impact Assessment (EIA). The results of this assessment are provided in the ES (Document Reference 6.1). This has considered all likely significant effects on the environment and nearest sensitive receptors, particularly local residents, as agreed during EIA scoping. Mitigation measures will be used as appropriate where they are necessary to limit impacts.</p> <p>A summary of the findings of the EIA summary is included in Chapter 16 and the Non-Technical Summary (NTS) (Document Reference 6.4).</p>

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 5 - Do you have any comments on the information presented in our Preliminary Environmental Information Report (PIER)?					
Local Community	18.06.18	30.07.18	Wonderful presentation, however I thought the investor should look into building carbon capture storage tank. Captured carbon (co2) can be source of business opportunities. The investors can give 10% investment opportunity to the local community. That will getting unemployed community involvement and equal contributions. Investor or Cory Riverside Energy Company can do presentations to universities and secondary schools within South East London too.	N	<p>Section 4.7 of NPS EN-1 explains the considerations to be given to Carbon Capture and Storage (CCS) and Carbon Capture and explains that all applications for new combustion plant which are of a generating capacity at or over 300MW and of a type covered by the EU's Large Combustion Plant Directive (LCPD) should demonstrate that the plant is "Carbon Capture Ready" (CCR).</p> <p>On the basis that the Proposed Development's maximum rated electrical output would be lower than 300 MW, the Proposed Development would be below the threshold set out in Directive 2009/31/EC29 to consider CCS.</p> <p>As well as creating and supporting jobs, the Applicant engages with local schools, creates apprenticeships and backs the Industrial Cadets programme. The Applicant is also an active member of the Belvedere Community Forum and regularly attends their meetings to update members.</p>
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	Please be considerate to the residents of Slade Green. I notice the community will be affected in same way as both planned routes/roads surround it.	N	The Applicant has noted this comment. Chapter 6 of the ES (Document Reference 6.1) presents the findings of the Transport Assessment and concludes that following appropriate mitigation measures, the construction and operation of the Proposed Development will not result in any significant effects to road users. A draft CTMP (Appendix K of the Transport Assessment (Appendix B.1 of the ES,

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					Document Reference 6.3)) has been submitted and will be used during construction to minimise any traffic impacts.
	18.06.18	30.07.18	The further impact this will have on local residents.	N	<p>The Proposed Development has been subject to a full EIA, the results of which have been provided in the ES (Document Reference 6.1). This has considered all likely significant effects onto the environment and nearest sensitive receptors, including local residents, as agreed during EIA scoping. Mitigation measures will be used as appropriate where they are necessary to limit impacts.</p> <p>A summary of the findings of the EIA summary is included in Chapter 16 and the Non-Technical Summary (NTS) (Document Reference 6.4).</p>

J.15 Other Considerations

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	The proposal appears to be a good idea as a way of re-using waste to generate energy. Impact on local community in terms of noise, lighting etc. needs to be taken into consideration when making final plans. I am certain however that the locals will be given preference when recruiting for workers to work in the facility (of course subject to qualification).	N	An outline Lighting Strategy has been submitted as part of this application (Appendix K.3 of Chapter 15 of the ES (Document Reference 6.3), which sets out the principles to mitigate potential effects that could arise from external artificial lighting associated with the Proposed Development. A final lighting design will be developed in accordance with the principles at the detailed design stage.
	18.06.18	30.07.18	3) NO to increased light pollution in the area. When I look out of my windows at the back of my house in the night it looks like it could be daytime! And you think it's acceptable to increase this?	N	.

J.16 Design

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	The drawing doesn't show the solar panels - the angle is wrong for catching sun's rays?	N	The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3) including solar studies. Each indicative design solution was evaluated to establish the potential for solar energy.
	18.06.18	30.07.18	The building should not be higher than the existing recovery facility building?	N	The evolution of the overall design and form of the building, including height and massing, is set out in the Design and Access Statement (Document Reference 7.3), which explains the reasoning behind the selection of the stepped building form. The maximum height allowed by the design parameters set out in Chapter 3 of the ES (Document Reference 6.1) is 65 m AOD; the existing RRRF building is 53.54 m AOD and therefore the maximum height of the main REP building will be higher than RRRF. A Townscape and Visual Impact (TVIA) assessment has been undertaken (see Chapter 9 of the ES (Document Reference 6.1)), the Applicant consulted on a number of overall building forms during non-statutory and statutory consultation which have been considered from a range of social, environmental and engineering perspectives. As set out in Chapter 9 of the ES (Document Reference 6.1) and the Design Principles document (Document Reference 7.4) the preferred building form provides embedded mitigation for visual effects and has been chosen to find a balance that reduces massing whilst maximising solar generation and following a consideration of the environmental and other constraints of the site.
	18.06.18	30.07.18	Aesthetically the roof should be in keeping with those nearby - a curved roof would give a feeling of being less hemmed in and more scope for the many birds that fly into and across the reserve both day and night as well as breeding there.	N	
	18.06.18	30.07.18	With regard to the Design of the new Building(s), this should surely at best the form of the existing Waste Incinerator: not Cory's preferred Design. And the new Building(s) should incorporate Ecological Features to minimise the Impact on the adjacent Nature Reserve.	N	

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Local Community	18.06.18	30.07.18	The design of the "park" must have minimal impact on Crossness Nature Reserve. For this reason I would prefer a curved building similar in shape to the existing monstrosity. There should be some mitigation perhaps in the form of a wildlife mural or a green wall or anything which will minimise the impact on the reserve and existing views to the river.		<p>The building form selected in the Design Principles (Document Reference 7.4) (the stepped roof design) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p> <p>The Applicant therefore considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>Due to the limited area of the REP site, it is not possible to avoid or mitigate all impacts arising through temporary and permanent loss of habitats. Compensation, or biodiversity offsetting, would be provided to offset residual effects resulting from the loss of habitats within the REP site. This will be delivered through a financial contribution to the Environment Bank with a legal agreement for contribution towards enhancement of habitats outside the Application Boundary.</p>
Question 4 – Do you have any comments on the design of the proposed Energy Park and the factors (social, environmental and economic) that we have taken into account in our preferred design, including our preference for a stepped, rather than a curved or flat building form?					
Local Community	18.06.18	30.07.18	Design is in line with existing facility	Y	The Applicant has had regard to the consultation feedback received during the non-statutory and statutory consultation and has developed its design proposals in response to the feedback received. The building form selected in the Design Principles (Document Reference 7.4) (the stepped roof design) is intended to find a balance that reduces massing whilst
	18.06.18	30.07.18	Aesthetically I prefer a curved form and will be more pleasing as it will complement the current structure opposite.		
	18.06.18	30.07.18	The current curved building is striking but I am keen that the proposed park is green as possible. If this works for		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			solar panels, that is fine – some trees within the district will help.		<p>maximising solar generation and limiting visual and ecological impact.</p> <p>The Applicant therefore considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access Statement (Document Reference 7.3).</p> <p>Embedded mitigation is provided by the Design Principles (Document Reference 7.4) detailing the design process of materials selection and Context Colour Pallettes to integrate the development into the context of its surroundings.</p>
	18.06.18	30.07.18	The curved design would look nicer but I understand that more solar energy panels can be used on that design which is a good thing.		
	18.06.18	30.07.18	I object to the huge stepped building in the strongest terms. Please use a curved form as with neighbouring buildings.		
	18.06.18	30.07.18	The proposed design is poor, the 'blocky' nature of the buildings makes the facility look like a nuclear power station. The two existing buildings at the Cory site and the Crossness sewage works are of a much better design.		
	18.06.18	30.07.18	Having solar panels on stepped roof is sensible, could these also be added to the data centre.		
	18.06.18	30.07.18	Stepped or curved would be better than flat. The design seem in keeping with the rest of the area.		
	18.06.18	30.07.18	The design of your proposed Energy Park is perfect it fits the purpose and matches other structure of the same purpose. Being that you are already in the business of waste management, that puts you in a better position to know better.		
	18.06.18	30.07.18	Design should be in line with the existing landscape without blighting the area. I will also like to see a sustainable design that makes use of natural lighting, ventilation and harvest of rain water for the facility.		
	18.06.18	30.07.18	I would like consideration given to the building design not being a collection of boxes. Thought has been given to the appearance of surrounding buildings. i.e the existing Corey structure and The Thames Water incinerator. It will		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			be a large building, so would be good to have a more interesting shape,		

J.17 Health and Safety

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	I don't support this proposal. It sounds that it helps to protect the environment, but it probably improves something that we know, but it will cause even worst effects on something that we don't know yet in the future. Building such a big electricity generation so closed to residential area is quite danger and it will cause long term side effects on people's health.	N	<p>The impacts on human health as a result of the Proposed Development are considered in Chapter 7 of the ES (Document Reference 6.1) and the Health Impact Assessment (Appendix K.1 of the ES, Document Reference 6.3). The Health Impact Assessment considered potential pollutants which cannot be directly compared against air quality standards to evaluate their likely effects on human health. No likely adverse effects on human health have been identified.</p> <p>The impacts from major accidents hazards are not expected to be significant taking into account the controls in the Environmental Permit and as such a standalone assessment of major accident hazards was scoped out of the ES. However, issues relating to major accidents and disasters are considered within Appendix K.6 of the ES (Document Reference 6.3).</p> <p>Furthermore, key risks are dealt with in the appropriate chapters of the ES (Document Reference 6.1) as follows:</p> <ul style="list-style-type: none"> Severe weather (flooding/storm surges), addressed within the Flood Risk Assessment (FRA) (Document Reference 5.2). The FRA identified that the proposed Finished Floor Level (FFL) would be set with a freeboard above the Environment Agency's forecast 1 in 200 year 2100 breach flood level. In addition, REP is located in
	18.06.18	30.07.18	(2) What impact will there be to our quality of life? (3) What are the health risks?		
	18.06.18	30.07.18	I welcome any project that reduces carbon emissions and provide creative solutions to our waste disposal and recycling challenge. The project has to take account of the local environment and ecology including Crossness nature reserve and breeding birds, and minimise impact on this wonderful resource, through the route of the cable and the design of the facility. The impact on the local community needs to be mitigated through careful consideration of the health hazards in relation to air quality, and the impact of the transport of waste and energy to and from the facility.		
	18.06.18	30.07.18	It is to let you know that We the people of Belvedere, Erith say NO to the garbage processing plant. You have no right to further contaminate the river, the environment and our blood. Those who took their money to allow for such a disgrace should quit their temporary seats they occupy or if they believe it is such a great idea, they might want to have the 'environmental bomb' built in their garden or just outside the Parliament and bring the London Eye to		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			Belvedere instead. May you all prosper and live in good health.		<p>an area benefitting from flood defences. However, should a breach of the defences occur, safe refuge would be provided for operational staff and visitors located above the flood level. Therefore, it is not considered that there is the potential for significant effects arising from the vulnerability of the Proposed Development to severe weather.</p> <ul style="list-style-type: none"> ■ Transport incidents, addressed through Chapter 6 which identified that effects would be mitigated through the final Construction Traffic Management Plan. Therefore, it is not considered that there is the potential for significant effects arising from the vulnerability of the Proposed Development to transport incidents. ■ Poor air quality events, addressed through Chapter 7 which did not identify significant residual effects. Therefore, it is not considered that there is the potential for significant effects arising from the vulnerability of the Proposed Development to poor air quality events. ■ Land contamination is addressed through Chapter 13 which did not identify significant residual effects. Appendix I.1 identified that the REP site is at low risk from Unexploded Ordnance. Therefore, it is not considered that there is the potential for significant effects arising from the vulnerability of the Proposed Development to these elements.
	18.06.18	30.07.18	<p>The brochure also mentions that the energy produced in the new plant could be provided to local homes. What about prices? Would local residents have their energy price reduced for being unlucky enough to live next door to the plant? There is no mention of it so what advantages would the local residents get? Just to make myself clear - no price cut would ever make me vote in favour of the proposed project as the health and environmental risks are far too high to put a price tag on.</p> <p>I hope my comments will be taken into consideration.</p>		
	18.06.18	30.07.18	<p>We do not support the proposals. We believe that Belvedere already does its fair share in hosting some of London's crucial infrastructure. We do not want this area to be turned into the dumping ground for the rest of London's waste. We are concerned about the impact the proposed waste-to-energy site and anaerobic digester will have on the health of residents.</p>		
	18.06.18	30.07.18	<p>Air quality - Dust pollution, dust, debris – increasing allergies for people who suffer from asthma and sinus issues. How will you ensure that allergy sufferers are not affected?</p>		
Question 3 – Please tell us your views about approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	All efforts should be made to go above and beyond the current “acceptable levels” of air quality we’ve seen in recent years how quickly these things can	N	The potential impact on human health from the operational emissions of REP have been assessed in Chapter 7 of the ES (Document Reference 6.1) and

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			change and for us local residents it is very important that our health is a priority. Investing in transport management to improve the surrounding area should also be looked at.		<p>no significant impacts are anticipated. Furthermore, a Health Impact Assessment (Appendix K.1 of the ES, Document Reference 6.3) has been undertaken. The Health Impact Assessment considered potential pollutants which cannot be directly compared against air quality standards to evaluate their likely effects on human health and concludes that effects on health outcomes will not be significant.</p> <p>The emissions from the ERF have been assessed in Chapter 7 of the ES (Document Reference 6.1), in line with Best Available Techniques (BAT), which defines the inherent mitigation measures which would be required under the terms of the ERF's environmental permit, to reduce emissions. The exhaust gas treatment process proposed for the Energy Park ensures that emissions of particulates and gases will be strictly controlled and comply with the Environment Agency's permitting system at all times.</p> <p>The existing Riverside Resource Recovery Facility (RRRF) has been operational since 2011 and is therefore accounted for within the baseline of all assessments.</p>
	18.06.18	30.07.18	It will create environmental friendly opportunities. Less health issues		
Question 5 - Do you have any comments on the information presented in our Preliminary Environmental Information Report (PEIR)?					
Local Community	18.06.18	30.07.18	We do not support the proposals. We believe that Belvedere already does its fair share in hosting some of London's crucial infrastructure. We do not want this area to be turned into the dumping ground for the rest of London's waste. We are concerned about the impact the proposed waste-to-energy site and anaerobic digester will have on the health of residents.	N	The Health Impact Assessment (Document Reference 6.3) considered potential pollutants which cannot be directly compared against air quality standards to evaluate their likely effects on human health and concludes that effects on health outcomes will not be significant.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Poor - we are concerned about the proposed capacity of the new site. Being able to process up to 805,000 tonnes of non-recyclable waste, would - in addition to the capacity already at the existing site - make Belvedere home to by far the largest waste-to-energy incinerator in the UK. We are concerned about the particulate matter which would be released which has a serious detrimental impact on human health.		The emissions from the ERF have been assessed in Chapter 7 of the ES (Document Reference 6.1), in line with Best Available Techniques (BAT), which defines the inherent mitigation measures which would be required under the terms of the ERF's environmental permit, to reduce emissions. The exhaust gas treatment process proposed for the Energy Park ensures that emissions of particulates and gases will be strictly controlled and comply with the Environment Agency's permitting system at all times.
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	Please mind the safety of the underground buried cables	N	The outline Code of Construction Practice (CoCP) (Document Reference 7.5) outlines the key health and safety considerations relating to the construction of the Electrical Connection route. The requirements of the draft DCO ensure that a full Code of Construction Practice is prepared and submitted for approval before the commencement of the relevant works.
	18.06.18	30.07.18	I am incredibly saddened and angered by these proposals and the way they have been presented by your company. I have only lived in the area for 2 years and in that time Crossness Nature Reserve has become a place I genuinely love. I cannot believe that in that short time you are not only not content with building two data centres on the Cory fields but are now almost certainly going to be allowed to build a second incinerator with all that entails for public health and the area's wildlife.	N	The Health Impact Assessment (Document Reference 6.3) considered potential pollutants which cannot be directly compared against air quality standards to evaluate their likely effects on human health and concludes that effects on health outcomes will not be significant. The emissions from the ERF have been assessed in Chapter 7 of the ES (Document Reference 6.1), in line with Best Available Techniques (BAT), which defines the inherent mitigation measures which would be required under the terms of the ERF's environmental

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>permit, to reduce emissions. The exhaust gas treatment process proposed for the Energy Park ensures that emissions of particulates and gases will be strictly controlled and comply with the Environment Agency's permitting system at all times.</p>

J.18 The Project and Its Benefits

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	Why cannot west London boroughs build an incinerator in West London to deal with their own waste. Bexley borough should hang its head in shame to even consider such a proposal yet alone be considering giving consent. Whatever financial gain for Bexley if this proposal goes ahead will just go into the coffers where the average person will find it difficult to see any benefit.	N	There will be significant benefits for the local community through Cory's investment as described in the Project and its Benefits Report (Document 7.2). In addition, Cory has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley. The Anaerobic Digestion facility will treat up to c.40,000 tonnes per annum of food and green waste This could be from both household and commercial operations (where home composting may not be appropriate). This will be a benefit to Bexley and the surrounding area, providing an in-borough solution for waste which is currently transported much further away to be processed. By providing a facility for food and green waste locally, REP will provide further environmental benefits, including: shortening the length of lorry trips collecting food and green waste therefore reducing carbon emissions.
	18.06.18	30.07.18	(4) In 2014 Cory received planning permission to increase efficiency (throughput) of the waste incineration facility and gave a commitment for "no new building" (construction)" No doubt weasel words will be found to withdraw that commitment Where are these weasel words?	N	The Applicant does not recognise or aware of the reference being made in this comment. Planning Permission (99/02388/CIRC24) was received in 2014 for the Applicant to increase the throughput of its existing facility (the Riverside Resource Recovery Facility (RRRF)) i.e. the efficiency of RRRF was increased without the need for any new construction for that facility. The Proposed Development for which the Applicant has submitted a DCO application for (the Riverside Energy Park) is an independent development

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>from RRRF and will only share joint facilities where it is efficient to do so, such as the existing jetty and internal road network.</p> <p>There is a national need for major energy infrastructure, such as REP, as established in the NPS EN-1 and NPS EN-3. REP also supports regional and local waste management needs. Over two million tonnes of London's non-recyclable waste is currently sent to landfill or shipped overseas. London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London's waste is currently sent will be operational after 2025. Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London's waste management shortfall but will also be a huge benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transported much further away to be processed. The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).</p>
	18.06.18	30.07.18	<p>I am a local resident in the Belvedere area and writing to you regarding your plans for the extension of the energy park located nearby. Please see below my comments as to why I am opposed to these plans:</p> <p>Social, environmental and economic: with the prosperity of the new Cross Rail coming to Abbey Wood and the surrounding areas it seems quite the opposite direction to then propose a 'waste energy park' right on the doorstep. Being a recent buyer in the area, one of the main factors</p>	N	<p>REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage. The Applicant has sought to maximise complimentary renewable energy generating capacity in the Proposed Development.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			to buy within this postcode was due to the Cross Rail. Had we known your proposed plans for a waste unit right on our doorstep we would have definitely thought twice about buying. If this development goes ahead, I assure you, this will have a detrimental affect with regards to people moving to the area, which completely goes against the idea of bringing people to the area using Cross Rail.		<p>In addition to the anticipated improvements in the prevention, re-use and recycling of waste, there remains an infrastructure deficit for the treatment of residual waste capacity that needs to be diverted from landfill and moved up the waste hierarchy. REP will help bridge that gap and be a suitable alternative to help treat London's waste remaining after recycling, thereby providing an alternative in preventing waste being sent to landfills or shipped overseas. Therefore, the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor's ambitious recycling targets. Further details are provided in the Project and its Benefits Statement (Document Reference 7.2).</p> <p>The Proposed Development will include an Anaerobic Digestion Facility which will accept green and food waste. Anaerobic digestion has been recognised as one of the best methods for food recycling and as such will help contribute towards the zero biodegradable or recyclable waste being sent to landfills target, as well as helping contribute towards the Mayor's 2030 municipal recycling targets and provide an 'in borough' Anaerobic Digestion solution for London Borough of Bexley preventing carbon intensive mileage of existing solutions. Outputs from the Anaerobic Digestion Facility may also be used as a fuel in the ERF to generate electricity or transferred off-site for use as a fertiliser in the agricultural sector.</p> <p>Furthermore, despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from</p>
	18.06.18	30.07.18	This will drive people away as nobody wants to live near a waste unit and in turn has the opposite ideas of bringing people to the area via Cross Rail developments. Please ensure all comments are consider and put forward in your Consultation Report!		
	18.06.18	30.07.18	As Bexley borough is already using up all its waste in the existing incinerator why are we building another one.		
	18.06.18	30.07.18	<p>I am strongly opposed to the very building of yet another incinerator, let alone your proposals for it. A second incinerator (with around 3% capacity for genuine renewable energy) is an obscenity, as is the fact it is being run for the profit of investment funds. Your marketing of it as a genuine contribution to London's renewable economy is equally obscene given the fact that it just another incinerator with tiny capacity for generating energy through genuinely renewable means....</p> <p>... I have carried out further research since round 1. I would argue that the need for a second incinerator (REP) plant in Bexley is not required and should be abandoned at this stage (and turned down by those in a position to do so). The reason being LBB proudly (and with some justification) boasts its high percentage of recycling, yet since the opening in Belvedere of the Cory Riverside</p>		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>Resource Recovery Facility (RRRF) for west London waste 6 years ago, it is noticeable that the recycling figures for LB’s Kensington and Chelsea, Lambeth, Hammersmith and Fulham and Wandsworth have all declined in parallel. Notwithstanding the question “why should Bexley suffer a second plant to allow west Londoners to renege on recycling targets” the Mayor of London’s own Environment Strategy (and London Assembly Environment Committee) states that a second incinerator would not be necessary if existing recycling targets are met.</p> <p>It is time to take the necessary action against the production of non-recyclable materials and for London Boroughs (not least Bexley) to put pressure on Government to stop the production and use of such material at source – not put the burden on consumers and local residents in the case of incineration.</p> <p>It seems to me the only people to profit from non-recyclable products are the producers and the companies such as Cory who incinerate it. Meanwhile local residents, open spaces and wildlife have to suffer.</p>		<p>landfill. REP will be a suitable alternative to help treat London’s waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, it is important to note, that the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor’s recycling aspirations. In addition, REP will contribute towards generating low-carbon renewable energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution Control Residue for use in the construction sector. Both are important elements of the Circular Economy.</p> <p>As such, the Proposed Development will support the waste hierarchy principles, will make best use of the residual waste arising in London, enabling the Circular Economy to be realised and contribute to making significant progress to London achieving status as a zero carbon city. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).</p> <p>There is no proven link between energy generation development and a decline in property prices. The location is considered suitable as it maximises the use of the River Thames and existing infrastructure. In terms of potential environmental impacts, which might be construed as reducing the desirability for living within the vicinity of the Proposed Development, these have been assessed as part of the EIA. Potential impacts relating to noise, air quality and odour are considered within Chapters 8 and 7 of the ES (Document</p>
	18.06.18	30.07.18	<p>I’m 100% AGAINST the building of another incinerator. Whilst I realise that waste is a major problem and landfill horrifies me, I don’t think that incineration is the solution. The emphasis should be on recycling more and reducing non recyclables and non compostables to zero.</p>		
	18.06.18	30.07.18	<p>Burning waste is not clean, nor renewable and your “proposals” are not borne out concern for the environment, but it is the prospect of huge profits for your company and stake holders that is driving the project.</p>		

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Reference 6.1) and no likely significant residual effects have been identified.</p> <p>RRRF has been operating successfully since 2011 and no odour complaints have been received at the RRRF since it became operational.</p>
	18.06.18	30.07.18	<p>The brochure also mentions that the energy produced in the new plant could be provided to local homes. What about prices? Would local residents have their energy price reduced for being unlucky enough to live next door to the plant? There is no mention of it so what advantages would the local residents get? Just to make myself clear - no price cut would ever make me vote in favour of the proposed project as the health and environmental risks are far too high to put a price tag on.</p> <p>I hope my comments will be taken into consideration.</p>	N	<p>The Application includes provision for Combined Heat and Power infrastructure on the REP site, which will enable the heat generated at the Energy Park to be supplied via a potential district heating network to c. 10,500 local homes and businesses.</p> <p>The Applicant is working closely with the London Borough of Bexley and local housing associations to deliver a local district heating network.</p> <p>The price of heat to consumers would be governed by the housing developer/association or relevant local authority, who would pay a proportion of their income from residents to the Applicant for providing the heat supply. However, plans to subsidise energy prices more generally do not form part of the proposals.</p>
	18.06.18	30.07.18	<p>What will Erith gain from this proposal? Will Erith gain any local community benefit for all the disruption?</p>	N	<p>REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage.</p> <p>The Applicant has sought to maximise complimentary renewable energy generating capacity in the Proposed Development.</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>The project will bring benefits to the local community including creation of job opportunities. The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).</p> <p>Irrespective of the Proposed Development Cory has a strong preference to recruit locally, wherever possible. As well as creating and supporting jobs, the Applicant engages with local schools, offers apprenticeship opportunities and supports the Industrial Cadets programme.</p>
	18.06.18	30.07.18	This is just helping central London, its not a benefit for Bexley?	N	<p>REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage.</p> <p>The Applicant has sought to maximise complimentary renewable energy generating capacity in the Proposed Development.</p> <p>REP will be a suitable alternative to help treat London's waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, it is important to note, that the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor's recycling aspirations. In addition, REP will contribute towards generating low-carbon renewable energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Control Residue for use in the construction sector. Both are important elements of the Circular Economy.</p> <p>As such, the Proposed Development will support the waste hierarchy principles, will make best use of the residual waste arising in London, enabling the Circular Economy to be realised and contribute to making significant progress to London achieving status as a zero carbon city, which is of benefit to Bexley residents, as well as the rest of London.</p> <p>Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London’s waste management shortfall but will also be a benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transport much further away to be processed. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).</p> <p>In addition, the project will bring benefits to the local community including creation of job opportunities. The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).</p>
	18.06.18	30.07.18	Weren't we told that the existing facility was capable of taking in refuse from other boroughs down river? There was no mention then that the facility/buildings would need to expand?	N	The existing facility (Riverside Resource Recovery Facility (RRRF)) accepts waste from across London and is a regional facility. REP would be a separate facility to that previously constructed and would not involve expansion of RRRF. REP would support regional and local waste management needs. Over two million tonnes of London’s non-recyclable waste is currently

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>sent to landfill or shipped overseas. London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London's waste is currently sent will be operational after 2025.</p> <p>However, the two facilities will share certain key infrastructure, such as the jetty, the development of REP is separate from RRRF and does not constitute an expansion to that facility.</p>
Question 5 - Do you have any comments on the information presented in our Preliminary Environmental Information Report (PIER)?					
Local Community	18.06.18	30.07.18	Poor - we are concerned about the proposed capacity of the new site. Being able to process up to 805,000 tonnes of non-recyclable waste, would - in addition to the capacity already at the existing site - make Belvedere home to by far the largest waste-to-energy incinerator in the UK. We are concerned about the particulate matter which would be released which has a serious detrimental impact on human health.	N	<p>The Applicant considers the location of REP to be highly suitable for this type of development as it maximises the use of existing infrastructure (the jetty and the River Thames). The Proposed Development can be provided without significant effects on the environment or the local community.</p> <p>REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage</p> <p>The Applicant has sought to maximise complimentary renewable energy generating capacity in the Proposed Development.</p> <p>The Proposed Development will include an Anaerobic Digestion Facility which will accept green and food waste. Anaerobic digestion has been recognised as one of the best methods for food recycling and as such will</p>
	18.06.18	30.07.18	We do not support the proposals. We believe that Belvedere already does its fair share in hosting some of London's crucial infrastructure. We do not want this area to be turned into the dumping ground for the rest of London's waste.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>help contribute towards the zero biodegradable or recyclable waste being sent to landfills target, as well as helping contribute towards the Mayor’s 2030 municipal recycling targets and provide an ‘in borough’ Anaerobic Digestion solution for London Borough of Bexley preventing carbon intensive mileage of existing solutions. Outputs from the Anaerobic Digestion Facility may also be used as a fuel in the ERF to generate electricity or transferred off-site for use as a fertiliser in the agricultural sector.</p> <p>Furthermore, despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from landfill. The REP will be a suitable alternative to help treat London’s waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, it is important to note, that the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor’s recycling aspirations. In addition, REP will contribute towards generating low-carbon renewable energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution Control Residue for use in the construction sector. Both are important elements of the Circular Economy.</p> <p>As such, the Proposed Development will support the waste hierarchy principles, will make best use of the residual waste arising in London, enabling the Circular Economy to be realised and contribute to making significant progress to London achieving status as a</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					zero carbon city. Further details are provided in the Project and its Benefits Report (Document Reference 7.2).
	18.06.18	30.07.18	I missed this corporate marketing exercise deliberately due to disgust at the misleading and frankly obscene way you have marketed this "park" to the public. I am frankly amazed you can get away with paling a second incinerator a "park" and present it as a genuine contribution to London's circular renewable economy.	N	<p>REP combines a number of elements to generate renewable energy and to secure energy supply, as recognised in National Policy Statement EN1, including: the Energy Recovery Facility, solar panels, Anaerobic Digestion and battery storage</p> <p>The Applicant has sought to maximise complimentary renewable energy generating capacity in the Proposed Development.</p> <p>The Proposed Development will include an Anaerobic Digestion Facility which will accept green and food waste. Anaerobic digestion has been recognised as one of the best methods for food recycling and as such will help contribute towards the zero biodegradable or recyclable waste being sent to landfills target, as well as helping contribute towards the Mayor's 2030 municipal recycling targets and provide an 'in borough' Anaerobic Digestion solution for London Borough of Bexley preventing carbon intensive mileage of existing solutions. Outputs from the Anaerobic Digestion Facility may also be used as a fuel in the ERF to generate electricity or transferred off-site for use as a fertiliser in the agricultural sector.</p> <p>Furthermore, despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted from landfill. The REP will be a suitable alternative to help treat London's waste remaining after recycling, helping</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>to ensure that less waste is sent to landfill or shipped overseas. Therefore, it is important to note, that the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor's recycling aspirations. In addition, REP will contribute towards generating low-carbon renewable energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution Control Residue for use in the construction sector. Both are important elements of the Circular Economy.</p> <p>As such, the Proposed Development will support the waste hierarchy principles, will make best use of the residual waste arising in London, enabling the Circular Economy to be realised and contribute to making significant progress to London achieving status as a zero carbon city.</p> <p>Further details are provided in the Project and its Benefits Report (Document Reference 7.2).</p>
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					
Local Community	18.06.18	30.07.18	The suspicion remains that extra waste will be accepted from European areas. This must not happen. If the selling point being used, centres on taking care of London's waste only, then that should be the case.	N	There is a national need for major energy infrastructure, such as REP, as established in the NPS EN-1 and NPS EN-3. REP also supports regional and local waste management needs. Over two million tonnes of London's non-recyclable waste is currently sent to landfill or shipped overseas. London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>landfill sites where London's waste is currently sent will be operational after 2025. Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London's waste management shortfall but will also be a huge benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transport much further away to be processed. The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).</p> <p>In addition, the assessment outlined in Project and its Benefits Report (Document Reference 7.2) only considers, London's waste, responding to the policy demand for London to be net self-sufficient. Whilst the ERF within REP is promoted to take waste from within London, there is no justification for it to be limited to the capital, especially given its location and being a nationally significant infrastructure project. As such, there is an identified need for approximately 2 million tonnes of residual waste management capacity required across the waste planning authorities adjacent to London.</p>
	18.06.18	30.07.18	We should be investing in recycling, not more incineration, which I believe is the view of the London Mayor and the GLA also. As such, perhaps Cory could fund some research into ways of achieving this.	N	The Planning Statement (Document Reference 7.1) sets out the planning policy context and assesses the Proposed Development against policy requirements outlined primarily in National Policy Statements (NPSs) and other relevant planning policy documents. REP fully supports national, regional and local policy requirements.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>The REP will be a suitable alternative to help treat London's waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, it is important to note, that the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor's recycling aspirations. In addition, REP will contribute towards generating low-carbon renewable energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion including the recycling of Incinerator Bottom Ash and Air Pollution Control Residue for use in the construction sector. Both are important elements of the Circular Economy.</p>

J.19 General Comments

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 1 – Please tell us your views about our proposals					
Local Community	18.06.18	30.07.18	I believe that this project will massively transform the way energy is supplied to various homes.	N	<p>The Applicant welcomes these supportive comments.</p> <p>The primary purpose of the Energy Recovery Facility (ERF) is to provide thermal treatment of Commercial and Industrial (C&I) residual (non-recyclable) waste with the potential for treatment of (non-recyclable) Municipal Solid Waste (MSW). NPS EN-3 paragraph 2.5.64 makes clear that waste combustion generating stations <i>'need not disadvantage reuse or recycling initiatives where the proposed development accords with the waste hierarchy.'</i></p> <p>The scheme will provide additional capacity contributing to the UK's and London's waste management self-sufficiency.</p> <p>Despite the expected improvements in the prevention, re-use and recycling of waste, there will remain residual waste that should be diverted to landfill. REP will be a suitable alternative to help treat London's waste remaining after recycling, helping to ensure that less waste is sent to landfill or shipped overseas. Therefore, the ERF will support the drive to move waste further up the waste hierarchy and work alongside the Mayor's recycling aspirations. REP will also contribute towards generating low-carbon energy in</p>
	18.06.18	30.07.18	I agree with them and like that you are trying to protect the environment.		
	18.06.18	30.07.18	I think that we need to look at different ways of getting rid of waste in general.		
	18.06.18	30.07.18	The scheme is probably the most efficient way of disposing of non-renewable, concerned that inner city councils use as an excuse to burn rather than recycle.		
	18.06.18	30.07.18	Very happy with proposals especially in the area of dealing with non-recyclable waste. Plastic bags etc. China and other countries are beginning to refuse some of our waste.		
	18.06.18	30.07.18	I was a bit concerned when first reading about the development, but now listening and seeing what the new construction will achieve hopefully.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion, both important elements of the Circular Economy. Further detail is provided in the Project Benefits Report (Document Reference 7.2), which also outlines the benefits of the Scheme.
	18.06.18	30.07.18	It is a good idea to have an energy park. I just wish the local residents would see some benefits from it. Maybe Cory can also invest in the sewage plants so that the residents don't have to put up with their smell. Find and put pressure on TFL to provide better transport links for local residents and their employees.		The Applicant welcomes these supportive comments. REP will contribute towards generating low-carbon energy in London from the remaining waste not suitable for recycling, and recover secondary materials post-combustion.
	18.06.18	30.07.18	In view of the fact that the world is failing a lot of environmental challenges lately, the environment has been littered with all kinds of waste, and there is an urgent need of a cleaner environment. This proposal from "Cory" is a welcomed idea, the reason being that when completed it will go a long way in helping to solve the problem of carbon emission while trying to warm houses and industries.		The Proposed Development will contribute to meeting the waste management needs of London. Annex A of The Project and its Benefits Report (Document Reference 7.2) provides an assessment of residual waste management capacity requirement in London and concludes a clear need for additional residual waste management capacity.
	18.06.18	30.07.18	I welcome any project that reduces carbon emissions and provide creative solutions to our waste disposal and recycling challenge. The project has to take account of the local environment and ecology including Crossness nature reserve and breeding birds, and minimise impact on this wonderful		The Applicant has been in consultation with TfL and a full traffic and transport assessment has been undertaken and is presented in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the local road network during the construction of the Proposed Development. Following the implementation of mitigation measures, such as a Construction

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			resource, through the route of the cable and the design of the facility. The impact on the local community needs to be mitigated through careful consideration of the health hazards in relation to air quality, and the impact of the transport of waste and energy to and from the facility.		<p>Traffic Management Plan, construction effects would be Minor adverse and temporary, and therefore Not Significant. A draft Construction Traffic Management Plan (Document Reference 6.2) has been development for the Proposed Development to manage and mitigate traffic impacts as a result of construction. However, no further improvement of local roads is proposed as part of the Proposed Development either by the Applicant or TfL.</p> <p>In addition, the Applicant is not involved in the Crossness sewage works and would therefore, not able to invest in these works, which do not form part of the Proposed Development.</p> <p>The Proposed Development will create a further c.85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. These job opportunities will be advertised to the local community.</p> <p>The Applicant welcomes these supportive comments. No odour complaints have been received at the RRRF since it became operational in 2011. The Applicant advises individuals to report any experiences of odour to the Environmental Health Officer at London Borough of Bexley so the source can be identified and action taken.</p> <p>Chapter 7 of the ES (Document Reference 6.1) presents the findings of the air quality assessment undertaken and concludes that the</p>
	18.06.18	30.07.18	Wonderful presentation and big prospect opportunities both for the individual and community with this London.		
	18.06.18	30.07.18	Good to add to existing development. Removal of rubbish should have positive environmental effects.		
	18.06.18	30.07.18	I think the presentation and explanation of the project is clear. I am happy that it is environmentally friendly and recycling waste. I am happy that this project will bring jobs and opportunities of employment to the area		
	18.06.18	30.07.18	The proposals are very good. I think it will be good and clean for the environment. The current one smells badly like sulphuric acids (H2S). Having visited your workshops at Belvedere I realised this will be of benefit to the area and the entire London.		
	18.06.18	30.07.18	(4) What could go wrong? I can only see positives highlighted.... but would be good to understand the genuine impact on us facilities.		

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	18.06.18	30.07.18	I am interested and happy to see such a large clean energy project develop so close to home.		<p>impacts from operational emissions from REP will be Not Significant. The exhaust gas treatment process proposed for the Energy Park ensures that emissions of particulates and gases will be strictly controlled and comply with the Environment Agency’s permitting system at all times.</p> <p>There will be significant benefits for the local community through Cory’s investment as described in the Project Benefits Report (Document 7.2).</p> <p>The Applicant welcomes these supportive comments.</p> <p>The ES (Document Reference 6.1) provides an assessment of the potential likely significant effects from the Proposed Development. The Environmental Permit will contain a series of management procedures and protocols should and unforeseen event occur. The impacts from major accidents hazards are not expected to be significant taking into account the controls in the Environmental Permit and as such a standalone assessment of major accident hazards was scoped out of the ES. However, issues relating to major accidents and disasters are considered within Appendix K.6 of the ES (Document Reference 6.3).</p>
	8.06.18	30.07.18	My view is that the proposals should not go ahead.	N	The Proposed Development has been subject to an EIA and the findings of this assessment are

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	18.06.18	30.07.18	Our local living environment will be huge damaged by the Riverside energy park proposed.	N	provided within the ES (Document Reference 6.1). This has considered the likely significant effects of the Proposed Development on the environment and nearest sensitive receptors. The Proposed Development can be provided without significant effects on the environment or the local community, as shown by the findings of the EIA, presented in the Environment Statement (Document Reference 6.1) a non-technical summary of which is provided with the Application (Document Reference 6.4). The operation of REP will be subject to stringent emissions limits set by an Environmental Permit granted by the Environment Agency. Any mitigation measures required will be secured through the DCO process and used as necessary to limit impacts.
	18.06.18	30.07.18	1) NO to another incinerator, there is no argument you can put forward that will ever assure me that this would ever be good for the environment, the local ecology and the local community.	N	There is a national need for major energy infrastructure, such as REP, as established in the NPS EN-1 and NPS EN-3. REP also supports regional and local waste management needs. Over two million tonnes of London's non-recyclable waste is currently sent to landfill or shipped overseas. London has a clear waste infrastructure capacity gap which urgently needs investment, particularly as only 2 out of the 11 active landfill sites where London's waste is currently sent will be operational after 2025. Furthermore, the anaerobic digestion plant will treat up to c. 40,000 tonnes per annum of local food and green waste. As such REP will not only play a significant part in addressing London's waste management shortfall but will

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					<p>also be a huge benefit to the London Borough of Bexley (LBB) by providing an in-borough solution for food and green waste which is currently transported much further away to be processed. The benefits of REP are presented in the Project and its Benefits Report (Document Reference 7.2).</p> <p>The Proposed Development can be provided without significant effects on the environment or the local community, as shown by the findings of the EIA, presented in the Environment Statement (Document Reference 6.1) a non-technical summary of which is provided with the Application (Document Reference 6.4).</p>
	18.06.18	30.07.18	I live in the Bridge Community in Dartford. (1) What is the impact of your proposed changes to the Bridge in Dartford? This is not clear.	N	<p>The Bridge Community in Dartford is in the vicinity of the proposed Electrical Connection. Some route lengths run outside the highway and include the Crossness LNR, adjacent areas of the River Cray and Dartford Creek valleys and through The Bridge development. The Electrical Connection will be buried underground and will connect to the existing Littlebrook substation. The only potential effects close to the Bridge Community will therefore be temporary as the cable is installed during the construction phase only.</p> <p>The Applicant is working closely with UKPN to confirm the final route, taking into account environmental, engineering and electrical considerations.</p>

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					An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) and an Outline Construction Traffic Management Plan (CTMP) (Appendix K of the Transport Assessment (Document Reference 6.3)) have been prepared and submitted with the application which set out mitigation measures to minimise and manage any construction phase disruption.
Question 2 – Please tell us your views on our proposed use of the River Thames					
Local Community	18.06.18	30.07.18	The use of River Thames is absolutely a good thing because it will facilitate inbound and outbound supplies with no environment negative effect.	N	<p>REP is ideally located to maximise the use of the River Thames and the Applicant's existing infrastructure for transporting waste and ash.</p> <p>A full traffic and transport assessment has been undertaken and is presented in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the local road network during the construction and operation of the Proposed Development taking in to account projected future changes to the use of the highway network, and conclude that effects on transport will not be significant, taking in to account the proposed mitigation measures.</p> <p>The DCO application has considered the environmental impacts of transporting waste by both road and river, the likely significant effects</p>
	18.06.18	30.07.18	I think it is good that The River Thames is being more used. I prefer The River being used than lorries being used as they increase the traffic on an already congested system.		
	18.06.18	30.07.18	The Thames is underused and should be seen as a highway to move around – as in Germany/Holland		
	18.06.18	30.07.18	River Thames – good idea single barge boat, can transport more than lorries on the road		
	18.06.18	30.07.18	By using the River Thames more, it will create less damage to the environment		
	18.06.18	30.07.18	Using the river as means of transportation is a great idea as it will free up much needed road space.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	The use of the river is a brilliant idea as it takes pressure of the roads that are already congested. More of these opportunities should be envisaged		<p>are presented in Chapter 6 of the ES (Document Reference 6.1).</p> <p>The waste input ratio of 75% by river and 25% by road is being assessed. This is similar to the current balance of operations at RRRF.</p> <p>As well as the '25% by road' scenario (known as the 'nominal' scenario), the Transport Assessment has assessed a '100% by road' scenario as a reasonable worst case scenario. The '100% by road' scenario considers all imported waste being delivered to REP by Refuse Collection Vehicles. This is a robust assumption, as some waste would be imported in larger lorries – reducing the actual number of lorry visits in that scenario.</p> <p>The Navigational Risk assessment (Appendix B.2 of the ES Document Reference 6.3) has assessed the '100% by river' scenario.</p>
	18.06.18	30.07.18	No problem		
	18.06.18	30.07.18	The proposal use of River Thames is excellent, because it will take many lorries off the road, lower emissions from those lorries. Making our environment a friendly one.		
	18.06.18	30.07.18	It is sensible to like the River Thames rather than more traffic on the roads.		
	18.06.18	30.07.18	With 75% coming along river, minimal traffic. Still have issue of getting waste to river from boroughs in the first place.		
	18.06.18	30.07.18	I think its excellent that the River Thames is being used to transport waste utilising natural transport routes makes sense and is better for the environment. I am sick of seeing large lorries on our small roads		
	18.06.18	30.07.18	Use of the Thames will take some pressure off the local roads --- but not all! Their will potentially be an increase on current lorry journeys as well as the river use.		
	18.06.18	30.07.18	Very good idea, using River Thames.		
	18.06.18	30.07.18	Yes please, use the river which is a wonderful underused resource. Please do not add to the traffic on local roads.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Sounds like a much better idea.		
	18.06.18	30.07.18	Fine as it would be better than additional lorries on our roads.		
	18.06.18	30.07.18	This should be reduced.	N	The Applicant has noted this comment. As set out in Chapter 6 of the ES (Document Reference 6.1), it is proposed that REP would normally operate on a balanced basis with waste being delivered by road and river. The Applicant is keen to maximise the use of its existing infrastructure, REP will be ideally located to maximise the use of the River Thames which would significantly reduce the movement of goods vehicles on London's road associated with the movement of waste to REP.
	18.06.18	30.07.18	As long as there are no accidents/spillages it makes better sense logistically and environmentally	N	The ES (Document Reference 6.1) provides an assessment of the potential likely significant effects from the Proposed Development. The Environmental Permit will contain a series of management procedures and protocols should and unforeseen event occur. The impacts from major accidents hazards are not expected to be significant taking into account the controls in the Environmental Permit and as such a standalone assessment of major accident hazards was scoped out of the ES. However, issues relating to major accidents and disasters are considered within Appendix K.6 of the ES (Document Reference 6.1). Chapter 12 of the ES (Document Reference 6.1) provides an assessment of the potential effects on water resources and concludes that no likely significant effects are expected from
	18.06.18	30.07.18	It will serve as a point for River cleaning and other spillage control on the River Thames. The aqua living organisms and other water things survive, which will help the environment for better future green. Our forth coming children and generations will smile and be safe.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					the Proposed Development. The Applicant has also considered the requirements of the Water Framework Directive and provided a compliance statement in Appendix H.1 of the ES (Document Reference 6.3) which concludes: <i>“The Proposed Development will not cause deterioration of the WFD water bodies in the vicinity of the site, nor compromise their ability to achieve their objectives under the WFD, and is therefore compliant with the WFD.”</i>
	18.06.18	30.07.18	The proposed use of the River Thames will contribute to the transport problems. I mean it will reduce the congestion or traffic to London – economically it will contribute is the reduction of lorries.	N	The Applicant notes this comment. Whilst the author’s comment is not entirely clear, it should be noted that the full traffic and transport assessment has been undertaken and is presented in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the local road network during the construction of the Proposed Development. Following the implementation of mitigation measures, such as a Construction Traffic Management Plan, construction effects would be Minor adverse and temporary, and therefore Not Significant. A draft Construction Traffic Management Plan (Appendix K of the Transport Assessment (TA) (Document Reference 6.3 has been developed for the Proposed Development.
	18.06.18	30.07.18	I am not sure what the impact will be on local residents and I am concerned about it.	N	The Proposed Development can be provided without significant effects on the environment or

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					the local community, as shown by the findings of the EIA, presented in the Environment Statement (Document Reference 6.1) a non-technical summary of which is provided with the Application (Document Reference 6.4).
	18.06.18	30.07.18	This is a facile and fatuous question implying that you are using the Thames for extraordinarily honourable purposes in an attempt to reduce the carbon footprint from trucks. You are in fact using the Thames to incinerate waste generated by some of London's richest boroughs and spewing it out over some of its poorest, the fact you are doing this by using boats on the river makes no difference to the extraordinary perversion of a renewable economy you are selling to the public.	N	The use of the River Thames as a means of transporting waste to the REP site is supported in regional and local policy. The Planning Statement (Document Reference 7.1) states that: <i>“London Plan Policy 7.26 and Draft London Plan Policy SI15 promote the use of waterways for transporting bulk materials via waterways...LBB Policy CS15 supports proposals to improve the sustainability of freight movement in the borough.</i> <i>In accordance with the objectives of the development plan outlined above, the aim of REP is for the majority of waste to be delivered to REP by barge from [Waste Transfer Stations] WTSs along the River Thames, utilising the existing jetty which is located immediately to the north of RRRF and the REP site.”</i> In addition, NPS EN-1 and EN-3 establish an urgent and substantial need for new energy generation infrastructure (including EfW) making clear the expectation that the industry will provide this capacity through private led investment such as REP. Alongside the drive for new energy generation is the desire for it to be renewable or low carbon, to meet climate change targets. REP meets these policy objectives, delivering new energy capacity through a renewable/low

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>carbon supply, with no public funding support or subsidy.</p> <p>The need for the Energy Recovery Facility (ERF) and Anaerobic Digestion facility components of Riverside Energy Park (REP) is described in the Project and its Benefits Statement (Document Reference 7.2). This document clearly demonstrates the need for additional capacity, in addition to that which already exists, and how the Applicant has maximised the efficiency of the existing site.</p>
Question 3 – Please tell us your views about the approach to the protection of air quality, traffic and transport management					
Local Community	18.06.18	30.07.18	Electricity is environmentally friendly and does not produce CO2. Electricity is on an increase demand because of electric cars and homes switching to cooking using electricity rather than gas.	N	<p>NPS EN-1 and EN-3 establish an urgent and substantial need for new energy generation infrastructure (including EfW) making clear the expectation that the industry will provide this capacity through private led investment such as REP. Alongside the drive for new energy generation is the desire for it to be renewable or low carbon, to meet climate change targets. REP meets these policy objectives, delivering new energy capacity through a renewable/low carbon supply, with no public funding support or subsidy.</p>
	18.06.18	30.07.18	I agree with keeping waste to a minimum and using “unusable” waste to provide energy makes sense.		
	18.06.18	30.07.18	Looks good		
	18.06.18	30.07.18	Cory has certainly put a lot of time and effort. In looking into the problems all of this new construction will cause, and personally I think there will be little or no problems with Cory approach.		
	18.06.18	30.07.18	As a student of energy procurement, I can confidently say that the style you have adopted is the trending thing now, because every energy conference has taken a leaf the		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			“Kyoto Protocol” or the “Paris Agreement” which campaigns for cleaner quality in air around the world.		
	18.06.18	30.07.18	I agree with your ‘Green’ approach.		
	18.06.18	30.07.18	Acceptable.		
	18.06.18	30.07.18	I cannot comment on this as my knowledge is very limited.		
	18.06.18	30.07.18	Another facile and ridiculous question which I will not bother answering.		
	18.06.18	30.07.18	South east of London is very busy area already as we need bridges to crossing river, it will be get worst and worst make more congestion here if the consent is granted, as your protection is useless.	N	A full traffic and transport assessment has been undertaken and is presented in Chapter 6 of the ES (Document Reference 6.1), as well as the Transport Assessment (Appendix B.1 of the ES, Document Reference 6.3). These assessments describe impacts on the local road network during the construction and operation of the Proposed Development taking in to account projected future changes to the use of the highway network, and conclude that effects on transport will not be significant, taking in to account the proposed mitigation measures. Chapter 17 of the ES (Document Reference 6.1) outlines the mitigation and monitoring and monitoring identified within the ES.
Question 4 – Do you have any comments on the design of the proposed Energy Park and the factors (social, environmental and economic) that we have taken into account in our preferred design, including our preference for a stepped, rather than a curved or flat building form?					
Local Community	18.06.18	30.07.18	I don’t have any objection to the present design.	N	The Applicant welcomes the supportive comments.
	18.06.18	30.07.18	Looks good, I’m no expert though.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	No problem.		Throughout the design process, consideration has been given to a range of design options addressing the Design Principles (Document Reference 7.4). The decisions on these options have, where relevant, been informed by the environmental assessment work and consultation with stakeholders, and as a result the design has evolved throughout the pre-application process. The final detailed design of the development will be in accordance with the Design Principles proposed, following approval by the local planning authority, as secured by requirement 2 of the draft DCO.
	18.06.18	30.07.18	That is absolute energy sustainability every parent and everyone is praying, hoping and anticipating. There will be employment opportunities, poverty rats will reduce and safer environment.		
	18.06.18	30.07.18	No comment on this. Spot on! Just stick to what's good and approved by the council.		
	18.06.18	30.07.18	The design and preferred building form makes good sense.		
	18.06.18	30.07.18	My comment is that the proposals should not be proceeded.	N	The need for the Energy Recovery Facility (ERF) and Anaerobic Digestion facility components of Riverside Energy Park (REP) is described in the Project and its Benefits Statement (Document Reference 7.2). This document clearly demonstrates the need for additional capacity, in addition to that which already exists, and how the Applicant has maximised the efficiency of the existing site.). Throughout the design process, consideration has been given to a range of design options addressing the Design Principles. The decisions on these options have, where relevant, been informed by the environmental assessment work and consultation with stakeholders, and as a result the design has evolved throughout the pre-application process to provide social,
	18.06.18	30.07.18	Strongly disagree that your proposed energy park to be built in Belvedere whatever what kind of design.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					environmental and economic benefits of the form that has been selected
	18.06.18	30.07.18	I hope that Cory will consider laying the cables on main roads and not through residential areas like Hazel Road in Slade Green or Slade Green Road or Manor Road. These are small roads that are used by the local community and will affect the neighbourhood especially consider that Slade Green only has one route in and one road out, so the element of choice of route will be affected especially in Slade Green	N	<p>The preferred route is Route 1 but following variant 1A along Norman Road and 2B through The Bridge development.</p> <p>Selection of a final single Electrical Connection route will be confirmed in partnership with UKPN, after further detailed engineering investigation has been completed. The final route will take account of UKPN's statutory obligations under the Electricity Act (to develop an efficient, co-ordinated and economical system) as well as the responses received from statutory consultation.</p> <p>It is expected that a single Electrical Connection route option will be decided upon during the pre-examination and examination process, and that will allow the Development Consent Order to be granted on the basis of a single route.</p> <p>Impacts associated with the construction of the Electrical Connection route on road users have been considered in the Transport Assessment (Appendix B.1, Document Reference 6.3) and Chapter 6 of the ES (Document Reference 6.1). UKPN propose to lay the cabling in the verges or alongside the running carriageway to reduce the instances of lane closures and disruption to the network. However, it is likely that single lane closure would be required to facilitate a safe working area or localised</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					footway diversion. The scale of works in the highway, verge or footway would be of a similar scale to works undertaken by telecommunications companies for installation of internet and telephone cabling, which are minor and temporary.
	18.06.18	30.07.18	I can see that Cory have developed this proposal in total isolation to all else that surrounds the site, have taken no account of the impact on the local environment of the RRRF (opened 2012) or the planning consents (July 2016) for the Data Centre (two four storey warehouses on the nearby Norman Road west side).	Y	<p>The Applicant has undertaken the EIA which is presented in the ES (Document Reference 6.1) in accordance with the EIA Regulations 2017. The methodology used to undertake the EIA is set out in Chapter 4 of the ES (Document Reference 6.1). Table 4.1 of Chapter 4 of the ES (Document Reference 6.1) identifies where the information defined by Schedule 4 of the EIA Regulations 2017 can be found within this ES, which includes a description of the relevant aspects of the current state of the environment (baseline scenario). The existing Riverside Resource Recovery Facility (RRRF) has been operational since 2011 and is therefore accounted for within the baseline of all assessments.</p> <p>The cumulative effects is assessment in individual ES topic chapters in accordance with Schedule 4 (part 5) to the Infrastructure EIA Regulations 2017 requires an ES to include “...a description of the likely significant effects of the development on the environment resulting from...the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p><i>importance likely to be affected or the use of natural resources</i>". This includes, the data centre site (Local Planning Authority reference: 15/02926/OUTM) to the east of the Crossness LNR and adjacent to Norman Road, owned by the Applicant with an extant planning permission. This committed development has been included in the EIA cumulative effects assessment as described in Section 4.10 of Chapter 4 of the ES (Document Reference 6.1).</p> <p>The proposals have therefore not been developed in isolation of existing built developments and their effects on the environment, or of committed developments in the local area.</p>
	18.06.18	30.07.18	<p>As I said, I do not want another incinerator! Clearly there are no social or environmental factors you have considered in your preferred design, you have chosen this because "square" is cheaper to build and maintain pure and simple! And I find it rather insulting to my intelligence that you phrased your question this way.</p>	N	<p>A TVIA has been undertaken (see Chapter 9 of the ES (Document Reference 6.1)) to assess the impact of the Proposed Development on the character of the surrounding area, amenity and views. The Applicant consulted on a number of overall building forms during non-statutory and statutory consultation which have been considered from a range of social, environmental and engineering perspectives. As set out in Chapter 9 of the ES and the Design Principles document (Document Reference 7.4) the preferred building form provides embedded mitigation for visual effects.</p> <p>The evolution of the overall design and form of the building is set out in the Design and Access</p>

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>Statement (Document Reference 7.3). The Applicant considers the stepped roof building form (design 3) to present the best overall solution and is therefore the design approach that the Applicant intends to include in the REP DCO application.</p> <p>The building form selected in the Design Principles (Document Reference 7.4) is intended to find a balance that reduces massing whilst maximising solar generation and limiting visual and ecological impact.</p> <p>In addition, it is not clear from the author’s response why they have taken offence to the phrasing of the question. As detailed in the Consultation Report (Document Reference 5.1) the Applicant has sought to carry out an effective consultation, with care being taken to carry out the community consultation in a constructive manner to invite feedback and allow consideration of that feedback by the Applicant in the development of the Proposed Development being applied for.</p>
Question 5 - Do you have any comments on the information presented in our Preliminary Environmental Information Report (PEIR)?					
Local Community	18.06.18	30.07.18	The information is made clear with no ambiguity.	N	The Applicant welcomes the supportive comments of the PEIR and the consultation materials and events more generally.
	18.06.18	30.07.18	Not presently.		
	18.06.18	30.07.18	No.		
	18.06.18	30.07.18	Well balanced – very good.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
	18.06.18	30.07.18	Very informative and helpful presentation – my views were heard and my questions answered. I was pleased to recover some info on the post too. The dates/times/places for the presentation is good and caters to all the community.		
	18.06.18	30.07.18	Very informative and glad we went.		
	18.06.18	30.07.18	Information was clear specially the maps.		
	18.06.18	30.07.18	The information presented in preliminary environment information report are of details and understandable.		
	18.06.18	30.07.18	The local and online information has been thorough and relevant.		
	18.06.18	30.07.18	No.		
	18.06.18	30.07.18	None.		
	18.06.18	30.07.18	None.		
	18.06.18	30.07.18	No.		
	18.06.18	30.07.18	None.		
	18.06.18	30.07.18	I have not seen it yet but I will.	N	The PEIR was made available on the Riverside Energy Park website (https://riversideenergypark.com/). The final findings of the environment assessments are presented in the ES (Document Reference 6.1).
	18.06.18	30.07.18	Unfortunately, I missed the exhibition but through the leaflet was useful and well presented, and clear.		
	18.06.18	30.07.18	Yes! Again, shocking that you would try to have us believe that the impact of what you propose to build would be negligible!	N	The final findings of the EIA are presented in the ES (Document Reference 6.1). The Proposed Development can be provided without significant effects on the environment or the

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					<p>local community, as shown by the findings of the EIA, presented in the Environment Statement (Document Reference 6.1) a non-technical summary of which is provided with the Application (Document Reference 6.4).</p> <p>Likely significant effects have been assessed in accordance with the EIA Regulations 2017 and relevant guidance, the methodology used to undertake the EIA is set out in Chapter 4 of the ES (Document Reference 6.1) and is considered to be robust. Where effects are concluded as being negligible, in EIA terms, those conclusions are therefore deemed accurate and appropriate.</p>
Question 6 - Do you have any comments on the different options for the route of the electrical connection? (The options are labelled 1,1A,2A and 2B).					
Local Community	18.06.18	30.07.18	I hope that when roads are dug up that they are finished in a quality way. What I see now is patch work roads with multi coloured tarmac looking like a messy patch work quilt. As though there is no quality control in place. Please consider the finished product and leave the work finished nicely and even better than before please.	N	The Applicant notes these general comments. Areas used during construction will be reinstated once the installation of the Electrical Connection for any given section is complete. The quality of the reinstatement of any highways will be the responsibility of the appointed contractor and will be in line with Specification for reinstatement of openings in the highway (3 rd Edition, DfT, April 2010).
	18.06.18	30.07.18	Strongly disagree that your proposed energy park to be builded in Belvedere whatever what kind of design for the route of electrical connection.		
	18.06.18	30.07.18	None.		

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	18.06.18	30.07.18	None.		
	18.06.18	30.07.18	No comment! What you're planning is of development and environmental friendly		
	18.06.18	30.07.18	The only thing I will say is that the inhabitants be fully informed	N	<p>The Applicant will continue to engage with members of the local community as the REP DCO application progresses. Updates will be posted on the Riverside Energy Park website (https://riversideenergypark.com/) and twitter (@CoryEnergy).</p> <p>An Outline Code of Construction Practice (CoCP) (Document Reference 7.5) has also been submitted with the DCO application which sets out measures to make the public aware of the activities on site and the available lines of communication with the Applicant.</p>
	18.06.18	30.07.18	Educate and inform students on essence of demand side management, in other to balance energy management regulations (sustainability) GSM London Greenwich campus is main education client Cory R.E should engage with. I will personally inform HOD of Energy and procurement to possible contact the Cory R.E.	N	<p>The Applicant has a good record of offering apprenticeships and working with schools in the local area.</p> <p>The Applicant regularly engages with the local community including open days, engagement with schools and via regular attendance at the Bexley Community Forum. This will continue once REP is developed.</p>
Question 7 – Please tell us if there is anything else that you want us to consider when finalising our proposals.					

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Local Community	18.06.18	30.07.18	Keep it as eco friendly as possible. Great work so far	N	The Applicant welcomes these supportive comments. EIA cumulative effects assessment as described in Section 4.10 of Chapter 4 of the ES (Document Reference 6.1), which includes an assessment of all relevant development proposals in the EIA for the Proposed Development.
	18.06.18	30.07.18	You cannot stop progress and this is a good proposal but as a close. The amount of work scheduled for the north of the borough, the extra housing and possible Crossrail extension, all add to disruption. This must be kept to a minimum.		
	18.06.18	30.07.18	Yes consider not going ahead with the incinerator.	N	
	18.06.18	30.07.18	Not yet		
	18.06.18	30.07.18	Picking up on riverside statement to positively effect the area socially as an electrical engineer with an advanced apprenticeship in power engineering and A Hnc in electrical electronic engineering behind me. I am personally interested in the job opportunities you may offer or through which contractors you mean to use during the construction and maintenance of this project.		

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					There will be significant benefits for the local community through Cory's investment as described in the Project Benefits Report (Document Reference 7.2). The Proposed Development will require a workforce in excess of 6,000 people over the construction period. These job opportunities will be advertised to the local community. Cory has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley.
	18.06.18	30.07.18	When can we visit – will there be an opening ceremony? How will we hear if planning (and when) its granted?	N	The Applicant will continue to inform the local community about the progression of the REP DCO application. Updates will be posted on the Riverside Energy Park website (https://riversideenergypark.com/) and twitter (@CoryEnergy). If the application is accepted for examination the Planning Inspectorate will maintain a regularly updated project website which will include the Secretary of State's decision on the application, once made. The Applicant will create and support jobs, engage with local schools, create apprenticeships and back the Industrial Cadets programme. The Applicant is also an active member of the Belvedere Community Forum and attends their meetings to update members.
	18.06.18	30.07.18	It is great that you're investing in this energy park but do not leave the local residents behind in your decision making and creating something or investing in the local area so that we can benefit from this investment on our doorstep		
	18.06.18	30.07.18	To get full community support in this initial stage and in the future, up to date communication via centres like churches, temples, schools leisure centres etc. should be made available including progress clarity. Moreover, Cory should be seen as prioritising the local communities in terms of employment, procurement & supplies.		
	18.06.18	30.07.18	Please when finalising your proposal, consider community , youth engagement and external		

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			investors. Please also try to partner with local schools and colleges.		
	18.06.18	30.07.18	Rehearsing and working with schools with South East London & Kent (Dartford). Investors investing in other developing countries.	N	The Applicant will continue to engage with local schools, create apprenticeships and back the Industrial Cadets programme. At present, the Applicant aims to continue investment in the waste infrastructure capacity gap in London as opposed to overseas.
	18.06.18	30.07.18	Given 10% investment opportunity to the local community first.	N	The Applicant is proud of its long history and association with the River Thames and London stretching back more than a hundred years and, since RRRF began operations in 2011, Cory's strong presence and connection with the local community and stakeholders in Belvedere too. The Funding Statement (Document 4.2) sets out the approach that will be taken for delivering the Proposed Development including funding. No public money or community funds will be required to deliver the Energy Park. There will be significant benefits for the local community through Cory's investment as described in the PBR (Document Reference 7.2) and Socio economics ES Chapter 14 (Document Reference 6.1) and the Applicant also has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley.
	18.06.18	30.07.18	You call our area is "BLACK BIN" in London, as all the recyclable and no recyclable waste including batteries throw to us. Why not build that in Kensington!	N	REP will be ideally located to maximise the use of the River Thames and the Applicant's existing infrastructure for transporting waste and ash.

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Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
Question 9 – Any other comments					
Local Community	18.06.18	30.07.18	Keep the legal rights to sue if the consent is granted.	N	It isn't clear what legal rights to sue the respondent is referring to. However, the Applicant has prepared a Statement of Statutory Nuisance, which explains the grounds of statutory nuisance that could be engaged by the Proposed Development. The majority of assessments undertaken did not identify significant adverse residual effects from the construction of the Proposed Development. Therefore, statutory nuisance is not expected.
	18.06.18	30.07.18	I can agree with "Cory" that their proposal is quite good and it deserves some encouragement. There is also need for "Cory" to consider investing in Africa and other developing countries.		The Applicant welcomes these positive comments. At present, the Applicant aims to continue investment in the waste infrastructure capacity gap in London as opposed to overseas.
	18.06.18	30.07.18	Happy about partnership with local authority in collecting – non-recyclable waste and transporting it along the Thames Network already in place.		
	18.06.18	30.07.18	I can only wish that this project go through successfully		
	18.06.18	30.07.18	Thank you for being open and honest in your presentation. I felt considered and that Cory cares for the environment.		
Local Community	18.06.18	30.07.18	I have lived in Belvedere for 16 years. I have experienced bad smells that have got better but still occur. This is important to me. I want the environment to be managed and I am very	N	The Applicant welcomes these positive comments. The Applicant advises individuals to report any experiences of odour to the Environmental Health Officer at London

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Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
			<p>pleased to hear that the surroundings nature reserve will be protected. I am excited for community prospects for education – job opportunities etc. Thank you for this informative presentation.</p>		<p>Borough of Bexley so the source can be identified and action taken.</p> <p>The LNR has been assessed within Chapter 11 of the ES (Document Reference 6.1) and with embedded mitigation no significant effects are likely to occur.</p> <p>In addition, there will be significant benefits for the local community through Cory's investment as described in the Project Benefits Report (Document 7.2). The Proposed Development will require a workforce in excess of 6,000 people over the construction period. These job opportunities will be advertised to the local community. Cory has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Bexley.</p>
Local Community	18.06.18	30.07.18	<p>Is there any opportunity for the youths or young adults is learn under your organisation?</p>	N	<p>The Applicant has a strong preference to recruit locally and has a good record of offering apprenticeships and working with local schools in Baxley.</p> <p>REP will create a further c. 85 new jobs with apprenticeship opportunities in engineering, river logistics and business management. Furthermore, the Applicant is committed to</p>

Riverside Energy Park: Consultation Report

Appendix J.4 – Summary of Relevant Responses from section 47 and section 48 Statutory Consultation

Consultee	Date Consulted	Response Deadline	Summary of Responses	Change Y/N?	Regard had to Response (s49)
					engaging with local schools and supporting the Industrial Cadets programme.

Appendix J.5 Technical notes issued to Greater London Authority

TECHNICAL NOTE

Job Name: Riverside Energy Park

Date: 5th September 2018

Prepared By: K Berry, N Malettras

Subject: London Waste Recovery Capacity - Response to GLA

In its response to the PEIR (dated 30 July 2018), the GLA stated that there *'is no need for further energy from waste facilities in London'* and that the *'ERF cannot be supported as it does not contribute to the circular economy and will likely suppress efforts to achieve recycling targets, as set out in draft London Plan SI7, London Plan policy 5.3 and the Mayor's London Environment Strategy (LES).'*

This note demonstrates that there is a consistent and substantial demand for the proposed Riverside Energy Park (REP), alongside reduced waste arisings and increased waste recycling. REP will replace landfill and move waste up the Waste Hierarchy.

Waste Treatment:

The adopted London Plan, the draft London Plan and the LES are all predicated on: waste arisings reducing over time; waste recycling increasing over time; and London achieving self-sufficiency by 2026.

As recognised in the LES, there is just over 2 million tonnes of EfW capacity within London, provided across: Edmonton EcoPark/NLHPP; RRRF; SELCHP; and Beddington ERF¹.

In addition, there is nearly 400,000 tonnes of London generated LACW currently contracted to be treated through EfW facilities located outside of London². e.g. Severnside (Bristol)

Table 1 presents the forecast waste arisings and desired waste recycling rates all as set out within the adopted or draft London Plans, or their respective evidence base. Using this information to calculate the remaining residual waste tonnage, existing capacity is subtracted to identify the amount of London generated residual waste that remains to be diverted from landfill. This final calculation is undertaken assuming both: on the basis that existing contracts outside of London continue to be honoured; and that London achieves net self-sufficiency and is reliant upon its own residual waste treatment capacity.

Other assumptions (or 'givens') are that:

- High recycling rate targets are met in full increasing from c.40-45%³ now to 65%⁴ by 2031.
- No change to the existing network of waste treatment capacity in London or outside.
- 100% availability of all waste treatment capacity in London or outside each year.
- Waste arising forecasts being 100% accurate.

¹ Appendix 2, London Environment Strategy, pg 102

² West London Waste Authority Business Plan 2016- 2019, October 2016. <http://westlondonwaste.gov.uk/wp-content/uploads/WLWA-Business-Plan-2016-19.pdf>.

³ A blend of c.33% LACW recycling and assumed 50 to 60% C&I recycling

⁴ Draft London Plan Policy driven blended recycling rate

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On this basis, Table 1 demonstrates that even when in compliance with adopted and draft London Plans policy (i.e. not including the contracted LACW tonnage exported for treatment at EfW facilities outside of London), **there is a sustained demand for the entirety of the ERF element of REP throughout the plan period ranging between 91% to 132% utilisation of the ERF's nominal throughput (dLP).**

In addition, even if LACW contracted 'out of London' EfW treatment capacity is included, **there remains consistent demand for the ERF element of REP throughout the plan period ranging between 32% to 73% of the ERF's nominal throughput (dLP).**

A full Waste Capacity Assessment will be included as part of the Application.

Circular Economy

This calculation is focussed solely on the ERF and ignores the 'in borough' treatment capacity provided through the Anaerobic Digestion Facility for local food and green waste. Both the ERF and the Anaerobic Digestion Facility recover both renewable/low carbon energy and secondary materials; they make a positive and significant contribution to the circular economy within London. This is achieved without any detriment to the recycling targets set out in adopted and emerging policy.

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Table 1: Applying the waste tonnages and recycling targets of the Adopted and Draft London Plans

Description		Adopted London Plan			Draft London Plan		
		2026	2031	2036	2026	2031	2036
Arisings (tonnes)	HH	3,387,000	3,492,000	3,589,000	3,287,000	3,348,000	3,453,000
	C&I	4,647,000	4,681,000	4,734,000	5,012,000	5,021,000	5,097,000
	Total	8,034,000	8,173,000	8,323,000	8,299,000	8,369,000	8,550,000
Recycling (%)	HH	55%	60%	60%	51%	60%	60%
	C&I	70%	70%	70%	70%	70%	70%
Recycling (tonnes)	HH	1,862,850	2,095,200	2,153,400	1,676,370	2,008,800	2,071,800
	C&I	3,252,900	3,276,700	3,313,800	3,508,400	3,514,700	3,567,900
	total	5,115,750	5,371,900	5,467,200	5,184,770	5,523,500	5,639,700
Recovery (%)	HH	45%	40%	40%	49%	40%	40%
	C&I	30%	30%	30%	30%	30%	30%
Recovery (tonnes)	HH	1,524,150	1,396,800	1,435,600	1,610,630	1,339,200	1,381,200
	C&I	1,394,100	1,404,300	1,420,200	1,503,600	1,506,300	1,529,100
		2,918,250	2,801,100	2,855,800	3,114,230	2,845,500	2,910,300
Existing capacity, London +		2,638,000	2,638,000	2,638,000	2,638,000	2,638,000	2,638,000
Remaining residual waste		280,250	163,100	217,800	476,230	207,500	272,300
REP ERF nominal throughput		655,000	655,000	655,000	655,000	655,000	655,000
Proportion ERF utilised by London		43%	25%	33%	73%	32%	42%
Existing capacity, London only		2,248,000	2,248,000	2,248,000	2,248,000	2,248,000	2,248,000
Remaining residual waste		670,250	553,100	607,800	866,230	597,500	662,300
REP ERF nominal throughput		655,000	655,000	655,000	655,000	655,000	655,000
Proportion ERF utilised by London		102%	84%	93%	132%	91%	101%

Existing capacity (tonnes)

Within London: NLHPP at 700,000; SELCHP at 488,000; RRF at 785,000; and Beddington ERF at 275,000 = **2,248,000**

Beyond London: Lakeside ERF at 90,000; and Severnside (Bristol) ERC at 300,000 = 390,000 Combined (London+) = **2,638,000**



TECHNICAL NOTE

Job Name: Riverside Energy Park (REP)
Job No: 42166
Note No: TN001
Date: 31st August 2018
Prepared By: F.Kirk-Lloyd / G.Harker
Subject: **Air Quality: Response to GLA Pre-Application Consultation**

Item	Subject
1.	<p>Introduction</p> <p>This Technical Note provides a response to the air quality points raised in GLA's Pre-Application Consultation Response dated 30 July 2018, reference GLA/4509/VH/01.</p> <p>It provides confirmation that, as the Preliminary Environmental Report (PEIR) demonstrates, and as will be demonstrated in the Environmental Statement (ES), the air quality impacts of REP, including the associated road and river transport, are not significant and support National, Regional and Local air quality policy requirements.</p>
2.	<p>London Air Quality Policy Compliance</p> <p>Policy SI1 requires that development should not:</p> <ul style="list-style-type: none"> a) Lead to further deterioration of poor air quality b) Create new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits c) Reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality d) Create unacceptable risk of high levels of exposure to poor air quality. <p>As the PEIR demonstrates, and as will be demonstrated in the ES, the development complies with these policy requirements.</p>
3.	<p>Assessment Scope and Methodology</p> <p>The PEIR provides a response to the comments made by GLA officers in relation to the scope and methodology. We do not accept that the cumulative impacts of both traffic and operational emissions have not been fully assessed. As stated in the PEIR response table, it is not possible or appropriate to incorporate both traffic and operational emissions within the same model, due to the requirement to verify the road traffic model. In both cases, ADMS software has been used; and the cumulative impacts at individual residential receptor locations have been assessed: i.e. a background element, a road transport element (where appropriate), the contribution from REP and the contribution from other significant point sources have been considered.</p> <p>The GLA made no comments originally regarding CHP. However, we are aware of Policy SI3 on Energy Infrastructure and the requirement to use low-emission CHP, which is not deemed to include gas engine CHP. We would welcome clarification from the GLA as to application of this policy where the fuel is generated from anaerobic digestion, as will be the case with REP.</p>



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4.	<p>BREF Note and Permitting</p> <p>In terms of the use of the BREF note emission limit values for the assessment, BREF notes set out the maximum emissions that would be allowable from the installation under Environmental Permitting in line with current technology. In accordance with EU Directives, the Environment Agency would need to apply such emission limits to the operation of the ERF. The use of the BREF note emission limits represents the worst case emissions that could occur, as the ERF would not be allowed to operate with higher emissions, not the 'best case scenario'. Indeed, in order to ensure that the ERF stays within Environmental Permit limits, actual operating emissions will be less than the BREF note values, but we have evaluated the environmental impact of the emissions assuming that it will operate at the maximum emission limits that will apply in operation in line with best practice.</p>
5.	<p>Assessment of North of the River Locations</p> <p>The locations of the impact of emissions from the ERF are clear in the data set out in the PEIR. We have assessed the impacts at relevant receptor locations in Rainham, within the London Borough of Havering.</p>
6.	<p>The Assessment of NO₂, Arsenic and Nickle</p> <p>Figure 7.7 of the PEIR is an isopleths of the maximum annual mean NO₂ concentration from the ERF from the 5-years' worth of data modelled assuming that the ERF operates at the maximum emission limits all year round. The predicted annual mean concentration ranges from 0.4 to 0.6 µg/m³. Specific receptor locations have been chosen in Rainham Town Centre (reference Figure 7.3.1) where the cumulative impacts of emissions from the ERF, road traffic emissions, background concentrations and other point sources are evaluated. The predicted concentrations are shown in Appendix C3, Table C3.2.9. For receptors 7, 18, 20 and 22 in Rainham Town Centre, the maximum predicted environmental concentration is 31.0 µg/m³ at Receptor 7. There is therefore no risk of non-compliance with air quality strategy objectives or EU Limit Values in Rainham Town Centre.</p> <p>Both the Arsenic and Nickle isopleths show that whilst predicted concentrations are very low in absolute terms, they are above levels which are potentially significant and therefore one needs to take into account the existing baseline concentrations to which the ERF contribution is added. As with the annual mean NO₂ concentrations, the assessment levels apply at locations of relevant exposure. Taking into account baseline concentrations, the maximum annual mean Arsenic predicted environmental concentrations are approximately 41% of the assessment level, and the maximum annual mean Nickel predicted environmental concentrations are approximately 24% of the assessment level. Whilst the impacts are deemed to be minor adverse at a small number of receptor locations (and therefore not significant impacts), it is clear that total concentrations are well below the relevant assessment levels.</p> <p>The potential non-negligible impacts at Crossness Nature Reserve, as well as Ingrebourne and Inner Thames Marshes will be considered further in the ES as to their ecological significance.</p>
7.	<p>The Bexley Riverside Opportunity Area</p> <p>The Bexley Riverside Opportunity Area lies along the south bank of the river. As shown in Figure 7.7 (and the other isopleths), the maximum impacts of emissions from the ERF occur to the north and east of this area. The highest predicted annual mean NO₂ concentrations on the south bank of the river are less than 2 µg/m³ in an</p>

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	<p>already industrialised area which would not be suitable for housing. Even if housing were to be located in this location, baseline concentrations would be similar to those in Rainham and therefore there would be no exceedances of air quality strategy objectives or EU Limit Values. The London Riverside Opportunity Area covers the northern bank of the river and the predicted concentrations are lower than immediately adjacent to the site. Again, if housing were to be located within this industrialised area, there would be no exceedances of air quality strategy objectives or EU Limit Values. The predicted concentrations within the Thamesmead & Abbey Wood Opportunity Area are lower than immediately adjacent to the site and are negligible. Overall, the impacts of the proposed ERF would not impact on the future delivery of housing growth in these areas.</p>
8.	<p>The Assessment of Road and River Transport</p> <p>The impacts of road transport have been assessed in detail in the PEIR and will be confirmed in the ES. Further detail will be provided on the impacts of river transport in the ES.</p>
9.	<p>Legal Emission Limits</p> <p>As noted in the answer to Paragraph 4, the emission limits used in the assessment are the maximum that would be allowable by the environmental permit and are therefore worst case, and not optimistic as stated. In terms of the stated criteria in the GLA response, the development is acceptable in that there is no risk to compliance with legal air quality limits and impacts from road and river transport are acceptable.</p>
10.	<p>Potential Impacts on Health</p> <p>The health impacts of emissions of heavy metals have been shown to be acceptable as shown in the HHRA submitted with the PEIR.</p> <p>We would also like to refer the GLA to Public Health England's (previously Health Protection Agency) position on air pollution impacts of municipal waste incinerators.</p>
11.	<p>Anaerobic Digestion and CHP</p> <p>In terms of the use of gas generated by the anaerobic digestion process, the response indicates that this would be acceptable to the GLA if the gas were injected into the grid. The development proposals also include for the use of the gas in vehicles on site, which presumably is also acceptable. The PEIR has shown the impacts of the use of the gas in CHP engines as a worst case, but we note the SI3 policy requirement regarding low NO_x CHP as per paragraph 3.</p>
12.	<p>Conclusions</p> <p>This Technical Note provides confirmation that, as the Preliminary Environmental Report (PEIR) demonstrates, and as will be demonstrated in the Environmental Statement (ES), the air quality impacts of REP, including the associated road and river transport, are not significant and support National, Regional and Local air quality policy requirements.</p> <p>GLA Policy requirements for CHP emissions from anaerobic digestion in relation to biogas engines need to be confirmed.</p>