Riverside Energy Park

Environmental Statement

Chapter 15: Other Considerations

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Appendix K

15 Other Considerations

15.1 Introduction

15.1.1 During the Environmental Impact Assessment (EIA) process, the Applicant identified that the Proposed Development may give rise to other environmental effects in addition to those described in **Chapters 6-14**. These include effects relating to the following topics:

- Human Health;
- Climate;
- Lighting;
- Waste;
- Aviation; and
- Accidents and Disasters.

15.1.2 The above topics were considered as part of the EIA Scoping process and the consultee comments on these topics in the subsequent Scoping Opinion (**Appendix A.1**) have been taken into account in preparing this Environmental Statement (ES). These have been included in assessments where necessary.

15.1.3 The Scoping Opinion (adopted by the Secretary of State on 5 January 2018) confirmed that the above topics do not require a specific 'topic' Chapter within the Environmental Statement, as no likely significant effects relating to them were anticipated. However, due to their interaction with other EIA disciplines (which have been assessed and reported within this ES) information has been provided on the above topics within this Other Considerations Chapter.

15.1.4 Where relevant, comments from other consultees throughout the pre-application process have been considered and have helped to shape the assessments provided.

15.2 Health Impact Assessment (HIA)

Introduction

15.2.1 Human health must be considered as part of the EIA process under the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017 (as amended) (the Infrastructure EIA Regulations 2017) (Schedule 4, part 4). NPS EN-1 specifically identifies 'health' as an issue to be considered by DCO applications. At paragraph 4.13.1 it states that:

"*Energy production has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society*

and to our health as a whole. However, the production, distribution and use of energy may have negative impacts on some people's health."

15.2.2 Additionally, the adopted and emerging London Plans require development proposals to take account of the potential impact of proposals on health and health inequalities. The Scoping Opinion (**Appendix A.1**), acknowledged that, as per the Scoping Report, the potential impact of the Proposed Development on human health would be assessed as part of the Air Quality assessment and through provision of a separate Health Impact Assessment (HIA) to be appended to the ES.

15.2.3 The findings of the HIA are included as **Appendix K.1** to this Chapter. The HIA, together with the Air Quality assessment presented in **Chapter 7,** provide the findings of the assessment of the potential effects of the Proposed Development on human health.

Methodology

15.2.4 **Appendix K.1** defines health as:

"*…a state of complete physical, social and mental wellbeing and not simply the absence of disease or infirmity".*

15.2.5 Therefore, the definition of human health and wellbeing draws on a wide variety of factors or determinants that could be of influence.

15.2.6 The HIA identifies several principal steps in undertaking a HIA, namely screening, scoping, appraising the evidence, making recommendations and monitoring and evaluation. It then identifies the baseline assessment and community profile.

15.2.7 The HIA utilises information gathered from the baseline and information from consultation undertaken. It then outlines relevant health and wellbeing objectives which are used as a starting point for the assessment. The Proposed Development is then compared against each objective to identify a positive or negative effect of development on the health and wellbeing of identified receptors, applying significance criteria and providing a basis for setting actions for further mitigation and enhancement. See **Appendix K.1** for further detail on the assessment methodology.

Summary of Assessment/Report

15.2.8 The findings of the HIA have drawn on various technical assessments reported in the ES such as air quality, ground conditions, transport, noise and socioeconomics which have considered potential risks to human health.

15.2.9 The findings have identified that with the inclusion of the proposed embedded mitigation measures, adverse effects on health outcomes will not be significant. However, it has been identified that there may be some long term beneficial effects on health outcomes associated with security of energy supply and the

potential for connecting to a local district heating network, depending on the pricing structure of this energy and the affordability to those on low incomes. The option of connecting to a local district heating network is continuing to be explored by the Applicant.

15.2.10 **Appendix K.1** contains further detail on the findings of the HIA.

15.3 Climate

15.3.1 The Infrastructure EIA Regulations 2017 (under Schedule 4 part 4), require an ES to consider 'Climate'. The Scoping Report proposed that effects from the Proposed Development on Climate (contributions to greenhouse gases) could be scoped out of the EIA, and that consideration of the potential impact from climate change on the Proposed Development would be considered in specific topic chapters where relevant.

Contribution to Greenhouse Gases

15.3.2 In relation to greenhouse gases and the effects on climate, the Scoping Opinion (**Appendix A.1**) confirmed that: "*the Inspectorate [(Secretary of State)] considers that significant effects are not likely and agrees that this can be scoped out of the ES*." The Secretary of State further noted that a qualitative assessment of greenhouse gas emissions should be submitted with the application.

15.3.3 A Qualitative Greenhouse Gas Emissions Assessment is appended to this Chapter (**Appendix K.2**), which considers direct emissions and energy consumption requirements. That assessment concludes that although there will be emissions of greenhouse gases (GHG) as a result of construction and operation of the Proposed Development, there would be no likely significant effects.

15.3.4 In relation to Greenhouse gas emissions associated with land use change, it is recommended that Riverside Energy Park (REP) sources local materials where practicable, limits any vegetation clearance to the minimum area necessary and replaces vegetation lost during construction where possible. Such measures would be set out in the CoCP, an outline of which is included as **Document Reference 7.5** and the outline Biodiversity and Landscape Mitigation Strategy (**Document Reference 7.6**). The operation of REP would contribute positively to the national, local and regional waste sector emission levels through the use of recovered energy from waste, renewable/low carbon energy generation and energy storage.

Impact of climate change on the Proposed Development

15.3.5 The Scoping Report sets out that the impact of climate change on the Proposed Development could be scoped out of the EIA except where it relates to:

- Terrestrial Biodiversity;

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

15.3.6 The Scoping Opinion (**Appendix A.1**) confirmed that the Secretary of State agreed with scoping out climate change in relation to other technical disciplines.

15.3.7 Impacts of climate change on the Proposed Development have therefore been considered as an inherent part of those topics listed above through the following Chapters:

- **Chapter 11** – Terrestrial Biodiversity;
- **Chapter 12** – Hydrology, Flood Risk and Water Resources; and
- **Chapter 15, Appendix K.1** – Health Impact Assessment.

15.4 Lighting

15.4.1 Artificial lighting will be required both temporarily during the construction phase of the Proposed Development, and permanently during the operational phase of REP.

Construction

15.4.2 During construction, temporary artificial lighting will be used to provide a safe working site during hours of darkness. The appointed contractors will follow relevant legislation and guidance to ensure potential adverse effects from temporary artificial lighting required during the construction phase are minimised. This includes:

- Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light, (2011);
- The Department for Communities and Local Government (DCLG) Guidance on Lighting in the Countryside: Towards Good Practice (1997);
- Assessment of the Problem of Light Pollution from Security and Decorative Light produced by Temple and NEP Lighting Consultancy on behalf of Defra, (2006);
- The Bat Conservation Trust – Bats and Artificial Lighting in the UK, (2018);
- The Bat Conservation Trust (BCT) – Statement on the Impact and Design of Artificial Light on Bats (2011); and
- Environmental Protection Act 1990 (as amended).

15.4.3 No likely significant effects from light intrusion, sky glow or glare are therefore anticipated.

15.4.4 The principles for ensuring appropriate use of lighting during the construction phase are set out in the Outline Code of Construction Practice (CoCP) (**Document Reference 7.5**), which has been submitted as part of the Development Consent Order (DCO) application. The measures to mitigate any adverse effects from temporary artificial lighting during construction will be detailed in the final CoCP which is secured in Requirement 10 of the draft DCO (**Document Reference 3.1**).

Operation

15.4.5 During operation, limited external artificial lighting will be used to ensure safe and secure use of the REP site. The detailed external artificial lighting design will be developed in accordance with relevant legislation and guidance in order to minimise effects from light intrusion, sky glow or glare. This includes:

- Clean Neighbourhoods and the Environment Act;
- NPS EN-1 (July 2011);
- NPPF (2018);
- National Planning Practice Guidance (NPPG) (March 2014)
- London Plan (2016);
- Draft London Plan (Aug 2018)
- Adopted London Environment Strategy (2018);
- LBB Core Strategy (2012);
- The Sustainable Design and Construction Supplementary Planning Document (SPD) (2014)
- CIBSE/Society of Light and Lighting (SLL) – Lighting Guide 1 – The Industrial Environment) Section 4.4;
- Health and Safety Executive (HSE) – HSG38 ‘Lighting at Work’;
- The Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light (2011);
- Bat Conservation Trust (BCT) – Bats and Artificial Lighting in the UK ;
- ILP’s ‘Guidance Notes for the Reduction of Obtrusive Light’ (2018); and
- BCT – Landscape and Urban Design for Bats and Biodiversity (2012).

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15.4.6 The external artificial lighting required for operation is not expected to change the overall nature of the existing ambient light conditions of the area. Nor are there additional lighting requirements for the existing jetty or shared areas already used for Riverside Resource Recovery Facility (RRRF).

15.4.7 An Outline Lighting Strategy (**Appendix K.3**) has been prepared for the DCO application setting out the principles for the operational external artificial lighting design for the REP site. The final Lighting Strategy, which will include the detailed external artificial lighting design, will be submitted to and approved by the relevant local planning authority as secured in Requirement 15 of the draft DCO (**Document Reference 3.1**), the final design must be in accordance with the principles set out in the Outline Lighting Strategy including in relation to the design principles outlined in **Document Reference 7.4**.

Potential Effects from Lighting

15.4.8 The Scoping Report stated it is considered that the Proposed Development will not result in significant effects to the environment in terms of lighting, and therefore proposed to scope lighting out of the EIA. The Scoping Opinion (**Appendix A.1**) confirmed that impacts from lighting during construction and operation on human receptors can be scoped out of the EIA. The Secretary of State did however request that the potential effects of lighting on terrestrial and marine ecological receptors are considered within the EIA.

15.4.9 Accordingly, **Chapter 11** (Terrestrial Biodiversity) considers the potential effects of lighting on terrestrial ecological receptors.

15.4.10 Since publication of the Scoping Opinion, further refinement of the Proposed Development and likely construction methodologies removed the need for intrusive works in the River Thames, greatly reducing the potential to give rise to significant adverse effects on the marine environment.

15.4.11 The requirement for undertaking an assessment of lighting effects on marine ecology has therefore also been removed. The following consultees were consulted in this regard and not did raise concerns with this approach:

- Environmental Agency – response received 17/04/2018;
- Port of London Authority (PLA) – response received 10/04/2018; and
- Marine Management Organisation (MMO) – response received 17/05/2018.

15.5 Waste

15.5.1 The Infrastructure EIA Regulations 2017 require (under Schedule 4, part 5) an ES to describe the likely significant effects of the development on the environment resulting from '*the disposal and recovery of waste'*.

15.5.2 The Scoping Report set out that likely significant effects relating to waste are not anticipated to arise from the construction or operation of the Proposed

Development. The Scoping Opinion (**Appendix A.1**) confirmed that the Secretary of State considered that operational 'general waste' is unlikely to result in significant effects and agreed this could be scoped out of the EIA. However, the Scoping Opinion required resultant road or vessel movements from other by-products from REP (including digestate, Incinerator Bottom Ash and Air Pollution Control Residue) to be factored into the relevant technical assessments. The Secretary of State also noted that waste arisings during the construction phase should be considered as necessary through the relevant technical chapters.

15.5.3 Accordingly, the volumes of waste (and other by-products) arising from the Proposed Development have been factored into the parameters for assessment within **Chapter 6** (Traffic and Transport).

15.5.4 An Outline CoCP (**Document Reference 7.4**) is submitted as part of the REP DCO and includes principles for the management of waste during the construction phase. An Operational Waste Statement is also submitted as part of the DCO application (appended to this Chapter as **Appendix K.4**) outlining the expected waste and other outputs arising from REP and identifying the proposed management routes for these arisings.

15.5.5 **Appendix K.4** identifies the waste airings and associated management from operations of office staff, maintenance, contractors and hazardous waste streams. It also identifies the operational outputs from the Anaerobic Digestion facility (biogas and digestate) and operational outputs from the Energy Recovery Facility (Incinerator Bottom Ash (IBA)), Air Pollution Control Residue (APCR) and Non-compliant waste (such as engine blocks and gas canisters).

15.5.6 Appropriate methods to handle the above mentioned operational waste is identified and addressed in the Operational Waste Statement (**Appendix K.4**).

15.6 Aviation

15.6.1 National Policy Statement (NPS) EN-1 requires an assessment of potential effects to be set out in the ES when a Proposed Development may have an effect on civil or military aviation and/or other defence assets.

15.6.2 The Scoping Report considered that sufficient mitigation exists, such that effects to aviation from the Proposed Development were not anticipated to be significant. However, the Scoping Report stated that a standalone statement in relation to aviation would be submitted as part of the REP DCO. The Scoping Opinion (**Appendix A.1**) considered it unlikely that a development of this type in this location would have a significant effect on aviation and agreed to scope it out of the ES. It however acknowledged that a standalone statement would be provided.

15.6.3 A statement on potential impacts to aviation is provided as **Appendix K.5** to this Chapter, which outlines relevant consultation undertaken in relation to aviation and that, due to sufficient existing mitigation measures and consultation requirements to be provided in the CoCP, effects to civil or military aviation or

defence interests are not anticipated to be significant alone or in combination with other developments.

15.7 Accidents and Disasters

15.7.1 As outlined in **Appendix K.6**, the Infrastructure EIA Regulations 2017 require an ES to provide:

"A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned".

15.7.2 The Scoping Opinion (**Appendix A.1**) agreed with the Scoping Report that there would be no requirement for a standalone assessment, and that risks of major accidents and disasters would be considered on a topic by topic basis.

15.7.3 The potential for significant adverse effects which could arise from the vulnerability of the Proposed Development to certain major accidents and disasters has been outlined within assessments in this ES as follows:

- 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 1 in 200 year 2100 breach flood level. In addition, REP is located in 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.

- 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.

- 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.

15.7.4 In addition, discussion on the potential for incidents due to gas explosions from the local gas network, terrorist incidents/safety breaches or fire/explosion is

included in **Appendix K.6** – providing measures which are considered adequate to prevent significant adverse effects to the environment.

15.7.5 With regard to the above measures, identified assessment outcomes, standard industry controls, measures within the outline CoCP (**Document Reference 7.5**) and the requirement for an Environmental Permit, it is not considered that there is the likelihood for significant adverse environmental effects by virtue of the vulnerability of the development to major accidents and disasters.

15.8 Summary of Other Considerations

15.8.1 This Chapter has identified where the Proposed Development may give rise to effects from human health, climate, lighting, waste and aviation as identified through the Scoping process.

15.8.2 These topics are not individually assessed as they are considered unlikely to result in significant effects to the environment, however they have been incorporated into topic assessments where necessary and relevant.

15.8.3 None of the effects in relation to topics considered within this Chapter have been identified as being significant.