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FAO: Mr Jonathan Green

15<sup>th</sup> May 2019

Dear Mr Green,

### **Application by Cory Riverside Energy for an Order Granting Development Consent for the Riverside Energy Park – London Borough of Tower Hamlets Written Representation – Deadline 2**

Thank you for your letter dated 17<sup>th</sup> April 2019. Please consider this letter as London Borough of Tower Hamlets (LBTH) Written Representation for deadline 2 on the Application by Cory Riverside Energy for an Order Granting Development Consent for the Riverside Energy Park (hereafter referred to as the Proposed Development).

LBTH has been liaising with the Applicant, and the Applicant has provided a response to the clarifications raised by LBTH. For the reference, this response has been provided as Appendix 1 of this letter.

LBTH's Interested Party Representation highlighted concerns over the effect of the Proposed Development on air quality, with particular regard to the air quality effect arising from the increase in river freight vessels, as a result of the Proposed Development. LBTH are now content that the air quality effects from the barges and tugs would not be significant on LBTH, this due to the location of the barges and tugs in the middle of the River Thames providing adequate separation distance from residential receptors. Tugs and barges would also be in one location for a short period of time in the vicinity of LBTH, so it is not anticipated that this would give rise to high concentrations at shore-side receptors, as concluded by the Applicant in the Environmental Statement.

However, LBTH notes that an assessment scenario has been utilized for the traffic and transport, and air quality assessment, whereby 100% of refuse would be delivered to the Proposed Development by road. In this scenario Plate 6.1 of Chapter 6 of the ES states that a total of 6.3 Refuse Collection Vehicles per hour are likely to make use of Blackwall Tunnel/A102 in LBTH. Therefore, such vehicles would utilize the Blackwall Tunnel northern approach, the A12 and the wider road network within LBTH to gain access to the Blackwall Tunnel. The Blackwall Tunnel northern approach is considered to be an air quality focus area for LBTH due to exceedance of nitrogen dioxide levels above National Air Quality Objective levels, noting that all of LBTH is designated as an Air Quality Management Area (AQMA). LBTH therefore has concerns regarding the 100% road scenario and its effect on LBTH, despite the ES



concluding no likely significant effects in relation to the air quality effects from road traffic, especially considering the area surrounding the A12 is a significant growth area within LBTH. Whilst an increase in air pollution might not be 'significant' any increase above National Objective levels should be resisted. This is supported by both national and regional policy guidance. LBTH also has concerns on the effect on Blackwall Tunnel/A102, the A12 and the wider road network within LBTH in terms of traffic and transport effects from the 100% scenario.

LBTH agrees with Q6.0.1 raised in the Examining Authority's first written questions, in that it would be beneficial to secure the use of river transport within any given consent, which would avoid use of the 100% by road scenario under normal operating conditions, and therefore lessen the effect on traffic and air quality emissions along routes between waste transfer stations and the Proposed Development.

To conclude, LBTH considers that the effect on traffic and air quality from the road vehicles delivering refuse to the Proposed Development should be reduced to secure avoidance of the 100% by road scenario within any given consent. LBTH has no comments to make regarding any other element of the Proposed Development and its effect, as it is considered that only traffic and transport effects and as a result air quality effects are likely to effect LBTH.

Yours sincerely,

Clare

Clare Richmond  
EIA Officer

## **Appendices**

### **1 - Applicant Response to LBTHs Requested Clarifications**

**Appendix 1 – Applicant Response to LBTHs Requested Clarifications**

<b>Tower Hamlets Clarifications</b>	<b>The Applicant’s Response</b>
Clarification that maximum throughput is secured in the DCO via certified documents i.e. the ES?	It is anticipated that the Energy Recovery Facility would treat approximately 655,000 tonnes of residual waste per annum. However, for the environmental assessment a ‘reasonable worst case’ maximum throughput of approximately 805,920 tonnes per annum has been assessed (see Paragraph 3.3.5, ES Chapter 3 (APP-040)). As per Schedule 11 of the DCO (APP-014), the ES will be certified for the purposes of this Order.
Clarification that operational transport is secured in the DCO via certified documents i.e. through the worst case assessment in the ES including the NRA and Transport Assessment?	<p>The Applicant has a long history as a river-based logistics company and, therefore, has a commercial imperative to maximise the use of the river transport waste. The Applicant has a network of existing waste transfer stations along the river, all of which have the capacity to increase operations within the existing consented and permitted levels.</p> <p>ES Chapter 6 (APP-043) and the Transport Assessment (APP-066) consider the implications of the Proposed Development operating under a 100% by road scenario as a reasonable worst case. Under this scenario, the assessments reported in ES Chapter 6 (APP-043) and the Transport Assessment (APP-066) assume that the majority of waste will be transported by 7t refuse collection vehicles (RCV), as a reasonable worst case. This provides a robust assessment as the commercial and industrial waste that REP would process would normally be transported in 20t articulated vehicles. No likely residual effects are identified under the 100% by road scenario.</p> <p>As per Schedule 11 of the DCO (APP-014), the ES (APP-038 to APP-100), TA (APP-066) and NRA (APP-067) will be certified for the purposes of this Order.</p>
Clarification regarding the statement of one additional movement per tide? All scenarios in the NRA (Table 5-7) state there will be 3 additional movements each way.	<p>Table 4-7 of the NRA (APP-067) describes the number of tugs and journeys in each scenario.</p> <p>A tug servicing Smugglers Wharf, for example, would make one inbound and one outbound journey. Where relevant, the NRA states that a site would receive one additional tug movement (consisting of one inbound and outbound journey). The figures presented in these tables are totals</p>

<b>Tower Hamlets Clarifications</b>	<b>The Applicant's Response</b>
	and therefore include the baseline.
Clarification regarding number of river journeys? Are the number of journeys (inbound and outbound) detailed in Table 4-7 per barge / tug or the total number of additional journeys.	<p>Table 4-7 of the NRA (APP-067) describes the number of tugs and journeys in each scenario.</p> <p>These tables set out the predicted total number of tugs and journeys required to meet the throughput. For example, Smugglers Wharf currently requires two tugs each making one inbound and outbound journey, this would increase to three tugs and therefore an additional inbound and outbound journey in Scenarios 1 and 2. Each tug will take multiple barges.</p>
Clarification that the road transport assessment of air quality (Paragraph 7.9.13 of Chapter 7 of the ES) is based on the worst case scenario from transport i.e. 100% of waste received by road?	<p>The 100% by road 'reasonable worst case' assessment for the operational phase of REP has been used in the air quality assessment</p> <p>Paragraph 7.4.1 of ES Chapter 7 (APP-044) sets out the parameters used in the air quality assessment. For the transport of materials and waste to and from the REP site, separate assessments have been undertaken assuming that all of the transport occurs by road, or all of the transport by river. The traffic data which have been used to derive the emission rates used in the air quality model automatically incorporate the worst-case traffic scenarios set out in Paragraphs 6.4.2 to 6.4.4 of ES Chapter 6 (APP-043). Therefore, the 100% by road 'reasonable worst case' assessment for the operational phase of REP has been undertaken for the air quality assessment (APP-044).</p>
The NTS (paragraph 4.1.7) states that two scenarios have been assessed in the ES i.e. 75% of waste arriving by river (the nominal scenario), and 100% by road (a reasonable worst case scenario). However it is noted that 100% by river has also been assessed in Chapter 6 and the NRA which has informed the assessment in Chapter 7. Clarification is required in this regard.	<p>Three scenarios have been assessed as part of the operational phase of REP. The scenarios are summarised in Table 6.6 of ES Chapter 6 (APP-043) and broadly reflect different modal split assumptions.</p> <p>The nominal scenario is a broad split that represents how REP is likely to operate day-to-day. The Applicant's existing RRRF typically operates with a minimum of 75% of waste input delivered by river, and therefore, it is expected that REP would normally operate with a similar waste input ratio of 75% by river and 25% by road. Although, this is referred to as the 'nominal' scenario, it is still conservative, as only RCVs are considered within the road which have a smaller transport volume than the more commonly used articulated</p>

Tower Hamlets Clarifications	The Applicant's Response
	<p>vehicles. This approach ensures that the 'nominal' scenario provides a robust case for assessment.</p> <p>In addition to the nominal scenario, a 100% by road 'reasonable worst case' assessment and a 100% by river 'reasonable worst case' assessment for the operational phase have been undertaken. The 100% by road and river scenarios seek to ensure that REP has the necessary commercial flexibility to operate efficiently and effectively, even though the likelihood is that the majority of waste will be transported by river. The scenarios are presented in the TA Scoping Report (see ES Appendices A.1, APP-062) and have been agreed with principal consultees (see Table 6.2 of ES Chapter 6, APP-043).</p>
<p>It is noted that as per Plate 6.1 of Chapter 6, in the 100% by road scenario, a total of 6.3 RCVs per hour are likely to make of use Blackwall Tunnel/A102 in Tower Hamlets. The blackwall tunnel approach is considered to be an AQ focus area for LBTH.</p>	<p>Plate 6.1 of ES Chapter 6 (APP-043) identifies the process for determining the trip generation for the 100% by road scenario associated with the ERF. As noted in ES Section 6.4 (APP-043), the 100% by road scenario is a 'reasonable worst case' and there is no intention of it being 100% by road, rather it is expected that REP would operate with a modal split for waste input similar to the Applicant's existing RRRF (ie. minimum 75% by river and maximum 25% by road). The assessment uses RCVs, which have a lower capacity by volume, requiring more movements when compared to articulated vehicles which are more likely to be used should the river not be available. Therefore, the assessment includes a conservative 100% by road scenario for vehicle movements associated with the waste import stream.</p> <p>An air quality assessment accompanies the DCO Application and is presented in ES Chapter 7 (APP-044). The assessment shows that no likely significant air quality effects are anticipated as a result of increased road movement from the operation of REP.</p>
<p>What standard of RCVs would be used i.e. which euro standard? I note that there is no mitigation proposed to ensure that emissions from vehicles are reduced as far as possible.</p>	<p>Road-based waste input would be transported in a mix of RVCs and articulated lorries from the local area. An 'all RCV' scenario is used in the assessment to represent a 'reasonable worst case'.</p> <p>The Applicant does not operate RCVs or articulated lorries, therefore the responsibility would be with the collection</p>

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	<p>company to specify the standard of vehicles. The RCVs would be required to operate to the prevailing Emission Zone standards in which they operate. Those travelling through the London ULEZ are to be Euro VI (the highest standard).</p> <p>The Applicant operates barges only. REP is likely to require investment in additional tugs to handle the additional throughput on the river. The additional tugs, as a minimum, would comply with relevant marine emissions standards and legislation applying at that time. However, the Applicant's preference is to adopt hybrid technology for new tugs purchased subject to operational viability and regulatory approval.</p>
<p>There seems to be no travel plan for the routes to be made by RCVs?</p>	<p>The Applicant does not operate a waste collection business and is unable to specify the collection routes for the RCVs. The Applicant is able to specify that, where possible, RCVs will approach from the west along the SRN and TLRN and from the east via the A206 and A2016 corridors.</p>