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Member of Parliament for Erith and Thamesmead

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By email

Dear Jonathan

Application by Cory Riverside Energy for an Order Granting Development Consent for the Riverside Energy Park

1. As MP for Erith and Thamesmead, the proposed Riverside Energy Park is within my constituency on its northern boundary with the River Thames.
2. Having lived just over a mile south of the industrial areas of Erith and Belvedere for over 40 years, I have personal experience of the impact of living quite close to the various industrial operations closer to the River Thames. I appreciate the employment opportunities these businesses bring, but I am equally aware of the negative impacts some bring to the area in terms of dust, odour and air quality. It is not an exaggeration to say that one can taste the pollution on occasion.
3. It is also no consolation to know that the prevailing wind from the south west carries some of the industrial exhaust across the river to Essex. So the impact of the proposed Riverside Energy Park would go beyond the boundary of my constituency, and I have an unusual responsibility in defending the quality of life not only for my constituents but also for non constituents on the other side of the River Thames.
4. Cory's current waste incineration operation on the adjacent site came on-stream before I was elected in 2010, although during its planning stages I was part of the campaign opposing the development.
5. My overriding feeling in making these representations is that my constituency already does enough waste incineration, and that together with the South East London Combined



Heat and Power plant located in South Bermondsey, the wider south east London does more than enough waste incineration.

Site location

6. I can fully understand why Cory has chosen this development site. From a business point of view it makes absolute sense, with the current plant and infrastructure in place. However I am disappointed to read in the documents that no alternative sites were considered.

7. Chapter 5 of the Environment Statement, para 5.2.6 states:

“Given that the Applicant owns the majority of the REP site, along with the proximity of associated road and jetty links with the River Thames (and associated network of riparian Waste Transfer Stations in London), the location was considered ideally suited for the Proposed Development. Whilst it was noted that the REP site would potentially interact with some non-statutory ecological designations (see Chapter 11), for the numerous reasons identified below the REP site was considered highly advantageous and consideration of alternative sites was not deemed necessary.”

Connection to National Grid

8. The REP site may be considered highly advantageous to the Company, however I am concerned about the works necessary to provide a viable connection between the plant and the electricity distribution grid.

9. In Chapter 5 of the Environment Statement, para 5.2.3 quotes National Policy Statement EN-3:

“Relating to grid connections, para 2.5.23 states: “Applicants will usually have assured themselves that a viable grid connection exists”, and “any application to the [decision maker] must include information on how the generating station is to be connected and whether there are any particular environmental issues likely to arise from that connection.”

10. I am concerned that a viable grid connection does not exist, and that the construction works necessary to make this connection will adversely affect the environment, transport, businesses that depend on transport, and local communities. There is quite a distance involved in the proposed electrical connection from the REP to the electricity distribution network at the Littlebrook substation in Dartford. Whichever cable route option is decided upon between these two points, there is going to be substantial disruption to the local community and road transport system during the construction phase of laying high



voltage cables underground. The roadworks associated with laying the cable underneath the carriageway or at the side of the A2016, as shown in Figure 2 of Document 6.4 Environmental Statement Non Technical Summary, will cause disruption to traffic over an estimated 15-24 months period. It is suggested that the A2016 route has been identified, because it is dual carriageway and has the capacity to withstand lane or carriageway closures.

11. I use the A2016 most days of the week in both directions from the Fish roundabout in Erith, and I can attest to the fact that it is showing increasing signs of pinch point stress particularly, but not exclusively, at peak times. The road is also a major feed into the M25 and particularly the Dartford Crossing. It is vulnerable to frequent congestion as a result of long term problems at the Crossing, and I have had various complaints from constituents about this. In fact I have recently raised questions with the Secretary of State for Transport, covered in local media, about the under-investment in the local road network around the Dartford Crossing despite a net income of £669 million in the 16 years since the build costs of the tunnel and bridge were paid off. The network of roads into the Dartford Crossing is congestion brittle, and will be quite vulnerable to any additional stress arising from a long term period of lane/carriageway closures.

12. At any point in the day it is evident in Erith that the A2016 is a major route for lorries and vans. The road is vital to existing and expanding distribution business activity that operates out of major sites in the area, some quite close to the proposed development. A two year period of successive lane and/or carriageway closures will have a real impact on that time sensitive logistics activity. The congestion caused will also affect other businesses, local and non local, logistic and non logistic, and will impact upon bus services that either use the road or cross it at various points.

13. It is not clear from the documents I have reviewed whether construction work to lay the cables would be in only one location at any one time, or in multiple locations at any one time. In the case of the latter, the traffic congestion arising will be even worse.

14. In document 6.1 the Environment Statement, Transport, Para 6.9.61 states: "The Electrical Connection would be constructed by way of sections of temporary works. The impact of those works would be transient and depend on many variables, such as: the method of construction; the form of traffic management, the programme and sequence of works; the length of time within a location; and the location of the active works." Para 6.9.62 continues: "Final details of the above are not currently known. The contractor would, however, employ appropriate worksite controls and agree the programme of works with the Local Authorities through the CTMP, to be secured by the DCO, to limit the impact of the works."



15. Para 6.9.65 states: "Traffic re-routeing effects due to lane closures associated with the Electrical Connection construction have not been quantitatively assessed in this ES or the accompanying TA because of the short-term nature of the works in any particular location. The construction of the Electrical Connection would be mobile with impacts at points along the route, based on a typical rate of open trenching progress, lasting up to 7 days, before the works move on. Where side roads are directly affected, lane closure or access closures would be managed to reduce the length of time for those works. Where trenchless installation techniques are required, the typical working period for a given length of road would increase. Details of the phasing and programme for the delivery of the Electrical Connection would be submitted to the local authorities closer to the time of the works and coordinated through a Streetworks process set out in the DCO."

16. So, given the statements above, there seems to be little, or indeed any, assessment of driver delay as a result of lane closures and side road closures along the A2016 and A206 corridors. I can say with confidence that driver delay will be significantly increased on the dual carriageways, and there will also be a knock on effect on driver delay at the connecting junctions well over and above that identified in Table 6.31: Construction Assessment – Driver Delay (AM Peak Hour). As a recent example I can advise that – albeit a full - closure of the A2016 for a two week period for central crash barrier repairs caused gridlock for a surrounding one mile radius during peak periods.

17. Even though the construction phase for the electricity connection would be temporary, the toxic air from a high volume of stationery traffic at various points along the route will not have a positive impact on local air quality.

18. The alternative of laying the cable along local roads for part of the way is going to cause substantial disruption for my local residents and bus services in the Lower Road/West St area. That disruption would also affect local roads beyond my constituency to the east, so that will be for others to comment.

19. I note that Cory considered the alternative of laying the cable under the River Thames inside an existing utility tunnel to connect to Renwick Road, Barking (north west of the REP site). However, Cory state that there is insufficient room in the utility tunnel to accommodate their cable. This is disappointing, because that option would cause much less disruption to my constituents and other road users in my area during construction, and would have reduced the temporary negative impact on air quality.

20. Overall, I do not consider the Applicant has assured that a viable grid connection exists, because the only connection put forward is dependent upon a good deal of



construction to lay cable along an important and busy transport corridor. This will cause driver delays and consequently increase air pollution during the 15 – 24 month construction period, even before the plant begins operation with its additional revolving door of HGV traffic.

21. In document 6.4 Environment Statement Non Technical Summary the Applicant asserts that the site will be located at “what is considered to be an appropriate distance from existing residential receptors”. I am also concerned about the distance of the plant from future residential receptors. For example, Belvedere is already undergoing substantial change with a good amount of new housing already built not far from the proposed plant at Belvedere Park and much more anticipated. So I believe those anticipated major changes in the form of new residential development in the Opportunity Areas on both sides of the River Thames are very relevant to considerations. Of course they cannot be consulted with, because they are not there yet, but such considerations are the very essence of the planning process. The trend for the future is exemplified in London Borough of Bexley’s Growth Strategy (the Belvedere section) which speaks of unlocking development: “The release of a significant amount of underutilised industrial land for residential and mixed-use development will mean that the development potential of Belvedere can be realised.” This suggests a particular need to consider the proposed development in the context of what is likely to happen to land use in the not too distant future.

22. It is telling to look at a plan of the site in relation to the surrounding area. Much of the surrounding land is shown as non residential, which is not out of the ordinary for an industrial area, however the same map in ten years’ time will look substantially different.

Crossness Nature Reserve

23. The site is also located immediately adjacent to the Crossness Nature Reserve. In the Mayor’s Policy within the Draft London Plan, Policy G6 A relates to biodiversity and access to nature and states that sites of importance for nature conservation should be protected. The Crossness Nature Reserve is important, because it is one of the last remaining areas of grazing marsh land within the Greater London area. Virtually the whole of Thamesmead has been built on land reclaimed from the marshes and what is left, including the wildlife and habitats associated with it, needs to be protected. I am very concerned that the construction work involved in the Riverside Energy Park proposal would affect the birds, mammals and invertebrates that inhabit or visit that area. The successful work over 20 years to nurture and encourage wildlife to the reserve could be undone by the disturbance. I have read in the Environment Statement all the assessments undertaken by the Applicant and, while mitigating actions may be proposed, I believe



there are real risks. There are no guarantees when it comes to the disturbance of the natural environment and wildlife, and any losses, even through temporary disruption, may not be recovered.

Mayor's draft London Plan context

24. The current London Plan is still the adopted Development Plan, however I understand that the significance given to the Mayor's Draft London Plan gains more weight in considerations as the Draft moves through the process to adoption.

25. The area surrounding the proposed Energy Park is recognised in both the existing London Plan and Draft London Plan as significant as the Bexley Riverside Opportunity Area. The site is also close to the Thamesmead and Abbey Wood Opportunity Area to the west. Because of the prevailing wind, the REP's effects on air quality would be also felt in a third Opportunity Area, across the River Thames, the London Riverside Opportunity Area. These Opportunity Areas recognise the potential for growth, including non residential, but the overriding driver is the Capital's pressing housing need.

26. The Mayor's Policy on Opportunity Areas within the Draft London Plan, Policy SD1 A 6) states that the Mayor will "ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration." I would argue that a new waste burning facility, even one that produces energy, does not meet these regeneration objectives. The emissions from the plant will increase the environmental barrier affecting the lives of people in these area currently and also might deter those considering coming to live in the area in the future. While the scheme would generate temporary employment opportunities during construction, the permanent additional jobs are estimated to be 75. In terms of the best interests of the Opportunity Areas in my constituency, I am not certain that the permanent job outputs sufficiently outweigh the long term negative environmental output from the REP stacks.

Air quality

27. In Table 7.9: Summary of Key Consultation Responses in Relation to Air Quality, the Applicant has commented that the proposal complies with Draft London Plan Policy SI1, that development should not:

- 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.

28. I am not clear as to how the proposed plant will not lead to some deterioration of the existing poor air quality, although I stand ready to hear the arguments that demonstrate how the facility would improve air quality, particularly when taking into account the cumulative emissions and additional traffic during construction and operational phases.

29. In Table 7.9 the Applicant considers that the cumulative impacts of both traffic and operational emissions have been fully assessed and it is not appropriate to incorporate both traffic and operational emissions within the same model.

30. In the response to key consultation in Chapter 7 (7.9) the Greater London Authority's response, the Applicant comments that "Due to the nature of the models, it is not possible to include all sources in the same model, however, similar source types have been modelled in a single model i.e. major point sources have been modelled together within the UK Atmospheric Dispersion Modelling System (ADMS) and road sources have been modelled together with ADMS Roads. The results at specific receptor locations have then been summed as appropriate to obtain the Predicted Environmental Concentration (PEC). 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."

31. I hope that the Examination can look at this. The point is made more than once by consultees in their responses and I have concerns that the full cumulative effect of emissions will not be made clear to the people who will have to live with them.

32. The London Assembly Environmental Committee on 30 July 2018 stated "Incineration also contributes to air pollution. In our report, we found that London's EfW incinerators emit over 2,000 tonnes of NO_x per year, 4 per cent of London's total. Many other pollutants, including chlorine, arsenic and mercury are also emitted from EfW facilities." In response the Applicant has stated that "The ES has shown that the effects of the emissions of these pollutants are not significant."

33. Again I hope the Examination's considerations will be able to shed light on why the effects of these pollutants are not significant.

34. I read in Chapter 7, document ref 6.1, the Applicant's argument to the effect that any additional degradation to air quality caused by traffic serving the new plant, or during construction, would be offset by the increasing introduction of leaner burning vehicles. I



do not believe that argument is convincing in a city that is going to have to work really hard to clean up its air.

Recycling

35. In terms of recycling, I note what the GLA said in its Planning Report July 2018:

“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).

“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 EfW 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.”

36. I support efforts to increase recycling and junk less. With no disrespect to the Applicant, it would be much better to see the contraction of waste incineration, on the basis that there would be less unrecyclable waste available. I definitely do not want to see an expansion of this activity, and its associated dependence on domestic and industrial waste. At this point in time when Parliament has declared a climate change emergency and the public has taken to the streets to demonstrate, we should be putting all our efforts into drastically reducing packaging and waste rather than increasing incineration.

Combined Heat and Power

37. The Applicant cites the potential of the REP development to provide Combined Heat and Power Infrastructure to supply a potential local district heating network.

38. In the Application doc 5.4 Combined Heat and Power Assessment para 1.1.8 states: “The Applicant has worked closely with London Borough of Bexley (LBB) and the Greater London Authority in preparing the LBB Bexley Energy Masterplan (EMP) (2015) to ensure that the benefits of any potential CHP opportunities are maximised including wider opportunities with heat export by considering a District Heating (DH) scheme.”

39. In its conclusion the report states that the LBB EMP identifies an opportunity for the RRRF to supply heat to the Peabody Thamesmead housing estate, Belvedere Growth Area



and Yarnton Way employment land developments as part of a new district heat network; and that the Applicant is engaged in discussions with LBB, Royal Borough of Greenwich and Peabody Estates regarding heat export opportunities.

40. The Applicant has also produced plans at Appendix E showing the location of potential heat consumers and at Appendix F showing possible pipe infrastructure for the Combined Heat and Power, which impressively covers almost the entire width of my constituency. There is a summary cost/benefit analysis at Appendix G.

41. In Document 5.4 Section 7 Economic Assessment, the Applicant anticipates that the scheme will commence operation in 2024 to align with projected build out programmes for REP and the prospective Thamesmead developments. The heat export infrastructure is estimated to have a capital cost of approximately £14.4 million, split over a two-year construction programme, and a back-up boiler would be provided to cover periods of unavailability, at a cost of approximately £3.1 million.

42. These are substantial capital costs, but I am not entirely clear as to how they will be funded.

43. The Economic Assessment in chapter 7 of document 5.4 identifies the Heat Network Investment Project (HNIP) funding, which aims to deliver carbon savings and create a self-sustaining heat network market through the provision of subsidies for DH projects, and the Applicant states that funding will be available for both public and private sector applicants with no constraints on scheme size. Grant funding, to assist local authorities in heat network project development, is also available through the Heat Networks Delivery Unit (HNDU). The Economic Assessment says that London Borough of Bexley has secured funding to undertake a detailed feasibility assessment and heat pipe route options appraisal, and the Applicant intends to engage Riverside Energy Park Riverside Energy Park CHP Study 48 with LBB's project team to support development of the proposed DH network through to implementation.

44. In para 1.1.3 the Applicant reminds us that "The National Policy Statement for Renewable Energy Infrastructure (NPS EN3) confirms that the decision-maker should be satisfied that appropriate evidence has been submitted to demonstrate that CHP is included, or that the opportunities have been fully explored."

45. I note what the GLA said in its Planning Report in July 2018:
"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 S18 and the LES, or could demonstrate demand for the heat produced.”

46. At this time I will accept that the CHP opportunities are being explored, but there are some important gaps in evidence that the CHP is viable. Discussions are ongoing with various parties, and London Borough of Bexley are apparently undertaking feasibility studies. However there appears to be no clear commitment at this stage that guarantees a ready market for Combined Heat and Power or that such a project will be financially or schematically viable. Additionally from my experience as MP, I have seen how housing developments in the area can slip. In the case of Peabody’s regeneration programme in Thamesmead, there has been substantial slippage in progressing housing developments, and so I would question the Applicant’s assertion of a 2024 start to align with projected build out programmes for REP and the prospective Thamesmead developments.

47. I would certainly argue for more clarification on how the capital funding of the CHP will be covered, whether it would be shared funding, whether it would be full funding or whether partners would have to provide some of the funding from their own resources. Given that the CHP is put forward as an integral and necessary part of the scheme, the Examiner will no doubt wish to establish clarity on this.

Consultation

48. While I know that consultation on the scheme has involved a number of statutory parties and other organisations, as a representative of the people I am concerned that local residents should be as fully involved as possible. I note that 23,000 residents have been contacted direct, and my assumption is that figure relates to those properties within the Consultation Zone. If one looks at the Consultation Zone Map (Figure 2.2 in Document 5.1), I would say around half of the consultation target relate to properties in the 2km radius of the plant itself and half in the zone of the proposed electricity connection conduit. There seem to be a limited number of residential properties across the River within the 2km radius of the site, but many more across the River to the north west who are not within the Consultation Zone but who would be in the flight path of emissions from the plant carried on the prevailing wind. So I hope the examination provides an opportunity for the Applicant to fully explain the rationale behind the Consultation Zone boundaries.

49. I have had concerns regarding the ability of some local residents to look at the full plans for the proposed development. A number of constituents have raised with me the lack of availability of the full details in local libraries. If that has been the case, the only alternative way would be for residents to look online. That would seem to discriminate against the surprising number of people who are not digitally connected. In that number I



include those with smartphones but no pcs, who would perhaps not choose to look at a series of documents and plans on a small screen.

Employment

50. The application indicates there will be a substantial number of temporary jobs created during the construction phase. The construction work proposed will be vulnerable to the potential skills shortages in the event of Brexit, which could lead to increased construction costs. This is relevant beyond the proposal under consideration, because this project will be competing for a skilled construction workforce alongside all the other local redevelopment, not least badly needed new housing in the surrounding areas.

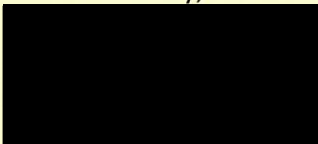
Conclusion

51. I seriously question whether there is a need for more of the same waste incineration to be located in this area. As far as I can see, the Riverside Energy Park will do nothing to encourage recycling or to reduce waste. I do not believe that it will contribute to the circular economy and does not support achieving high recycling rates. In fact, once councils buy into this scheme it is likely to suppress recycling rates in the capital. It is counter intuitive to be increasing incineration capacity just as public opinion is forcing manufacturers and supermarkets to drastically change the way they package goods and also their waste policies.

52. After landfill, incineration is the least environmentally friendly form of waste disposal, and the question I keep asking myself is whether the energy said to be produced by this scheme justifies the negative impact it would have on the surrounding areas.

53. I question whether the proposal is viable in respect of the connection to the electricity grid and the combined heat and power component.

Yours sincerely,



Teresa Pearce MP
Member of Parliament for Erith and Thamesmead