

RIVERSIDE ENERGY PARK
BELVEDERE (CABLING THROUGH DARTFORD, KENT)

LOCAL IMPACT REPORT

A REPORT PREPARED JOINTLY BY KENT COUNTY COUNCIL AND DARTFORD
BOROUGH COUNCIL MAY 2019

1. Introduction

- 1.1. This report has been prepared by Kent County Council and Dartford Borough Council as statutory consultees, in accordance with advice and requirements set out in the Planning Act 2008, the Localism Act 2011 and Advice Note One: Local Impact Reports (Version 2, April 2012, The Planning Inspectorate).
- 1.2. The Advice Note states that a Local Impact Report (LIR) is a 'report in writing giving details of the likely impact of the proposed development on the authority's area'.
- 1.3. The Advice Note states that when the Examining Authority decides to accept an application, it will ask the relevant local authorities to prepare a LIR and this should centre around whether the local authority considers the development would have a positive, negative or neutral effect on the area.
- 1.4. The Report may include any topics that the local authority considers to be relevant to the impact of the development on their area and may be used as a means by which their existing body of knowledge and evidence on local issues can be fully and robustly reported to the Examining Authority.
- 1.5. The LIR has been written to incorporate the subject areas suggested in the Advice Note, the subject areas in the Environmental Statement and in response to the proposed requirements submitted with the application for a Development Consent Order (DCO).

2. Location and Site Characteristics

- 2.1. The proposed Riverside Energy Park (REP) is to be located within Belvedere, adjacent to the River Thames, and lies to the east of the Borough of Dartford. The REP is accessed by vehicles from Norman Road, which then links to the dual carriageway A2016 Picardy Manor Way. To the east this then runs into the A206 which is the key strategic road linking to the M25 (Junction 1a) and the Dartford

Crossing. The A206 within the Borough of Dartford is known as Bob Dunn Way and accesses directly to Junction 1a over a distance of 1.9 miles. Bob Dunn Way also serves a recent major mixed use development, located to the north of the road, known as The Bridge, which has approximately 1500 dwellings, a primary school, secondary school, community facilities and significant commercial floorspace comprising a mix of Class B1, B2 and B8 uses. The development is served by Fastrack which is a dedicated rapid transit bus service which runs between Dartford and Gravesend serving major developments and key nodes in order to encourage reduced use of the private car (Appendix A: Fastrack Route and Timetable).

- 2.2. The proposal includes an Electrical Connection to Littlebrook substation. The red line boundary includes alternative routes for this Connection. The proposed Electrical Connection route options in the Borough of Dartford and the County of Kent run along Bob Dunn Way and the Fastrack route through The Bridge development.
- 2.3. The Borough sits around strategic infrastructure: the A2(T); the M25 and the Dartford Crossing; as well as High Speed 1 and Ebbsfleet International Railway Station in the east of the Borough. The Borough is an area of high growth identified through historical and current national and local planning policy. The key strategic roads outside of London which would serve the REP run through the Borough of Dartford, being the M25 and the Dartford Crossing (known as the A282) and the A2 trunk road.
- 2.4. The major interchange of the two strategic traffic routes, the M25 and the A2(T), is located within Dartford. Both of these routes, but particularly the Dartford Crossing (A282) and the adjacent junction 1A suffer from congestion at peak times and when there are traffic incidents at the Dartford Crossing and its approach (which are frequent and severe) traffic queues along Bob Dunn Way and can take several hours to clear.
- 2.5. Although the Borough and District Council are keen to ensure that operational traffic generated by the proposed REP does not exacerbate the traffic congestion in the area. The main focus is the electrical connection routes as both options in the Dartford Borough are on sensitive routes, in terms of transport.
- 2.6. There are residential areas in close proximity to both the proposed electrical connections.

3. Planning History

- 3.1. In December 2017 the Borough Council and the County Council were consulted under Regulations 10 and 11 of the Planning Act 2008 with regard to the information to be provided in the Environmental Statement for REP. The Council sought more information on the construction impacts of the Electrical Connection and the traffic impacts of the development on the road network within Dartford.

- 3.2. In April 2018 the Borough and County Councils were consulted under section 47 of the Planning Act 2008. In June 2018, Borough and County Councils were formally consulted under section 42 on the development.

4. Description of Proposed Development

- 4.1. The proposed development is understood to be:

- The Riverside Energy Park (REP) site, located to the north of Belvedere off Norman Road;
- The main temporary construction compound located to the south of the REP site and west of Norman Road;
- The electrical connection, running underground between the REP site and the electrical connection point at Littlebrook substation connecting into an existing National Grid building in Dartford; and
- The cable route temporary construction compounds required to support the construction of the selected electrical connection route.

- 4.2. Kent County Council and Dartford Borough Council are drawing attention to impacts linked to the electrical connection route only.

5. Planning Policy

National Planning Policy

- 5.1. National Planning Policy Framework, Paragraph 98 - states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Kent County Council Policies

- 5.2. Kent Minerals and Waste Local Plan - the vision and strategy for waste management and mineral provision up until the year 2030. Policy DM7 (criterion 7), Safeguarding Mineral Resources.
- 5.3. The Kent County Council Rights of Way Improvement Plan (ROWIP) - aims to provide a high quality PROW network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work and visit. The County Council's PROW and Access Service is committed to working in partnership with the applicant to achieve the aims contained within the plan.

- 5.4. Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031) - transport policies, considering local schemes and issues as well as those at a countywide and national significance. Transport Priorities for Dartford (Page 32 to 33)

Dartford Borough Council Development Plan

- 5.5. Dartford Borough Council Core Strategy:
- CS13: Green Belt
 - CS15 Managing Transport Demand
- 5.6. Development Policies Plan
- DP3: Transport Impacts of Development
 - DP4: Transport Access and Design
 - DP5: Environmental and Amenity Protection
 - DP12: Historic Environment Strategy
 - DP22: Green Belt in the Borough
 - DP24: Open Space
 - DP25: Nature Conservation and Enhancement

6. Likely Significant Effects of the Proposed Development

- 6.1. Kent County Council and Dartford Borough Council have been consulted on the scope of the Environmental Statement and throughout the preparation of this LIR, have considered the following local impacts which are brought to the attention of the Examining Authority:
- Highways and Transportation (the County Council as Local Highway Authority);
 - Public Rights of Way (PRoW);
 - Ecology;
 - Flood Risk and Drainage;
 - Air Quality; and
 - Socio-economic impacts.

Highways (Kent County Council as Local Highway Authority)

Local Highway Network

- 6.2. The local highway network in this area is extremely sensitive; incidents at the Dartford Crossing are frequent and lead to severe congestion within and around the Dartford area as drivers are delayed and seek alternative routes. As well as being located at the junction of two major strategic roads (the A2 and M25), the Borough of Dartford also straddles the M25/A282 as traffic converges for the Dartford Crossing. The highway network in this area is unusual in that the strategic road network has a number of closely spaced and inter-connected junctions. An incident on any part of

the strategic network will therefore create an impact over a wide area of the local networks as traffic diverts onto local roads to avoid the incident, including through Dartford Town Centre. This is exacerbated by the fact that there are very few east-west routes through the Borough and so the A2 in particular is used for short trip local movements. An incident on the strategic network can result in congestion on the local road network that can take several hours to clear disrupting lives and the local economy.

- 6.3. The impact of the development on the Dartford highway network would be mainly caused during the 45 month construction phase. A Construction Traffic Management Plan will need to be secured as part of a DCO requirement in order to ensure the impacts of the construction traffic on the local highway network are minimised. The Construction Traffic Management Plan will need to include contingency procedure systems through which the operator seeks to manage the movement of lorries when incidents occur on the network.
- 6.4. The construction of the electrical route between Binnie Road and Rennie Drive will be along the Fastrack dedicated bus route, which is a key piece of infrastructure in achieving the modal shift that is needed in the area. The construction along this route is therefore not ideal as it may have an impact on Fastrack services. It is however the preferable approach, rather than the alternative option to carry out construction along A206 Bob Dunn Way – a key transport corridor to the Dartford Crossing.

Significant Road Schemes

- 6.5. In February 2019, Highways England published the Orders for the A2 Bean and Ebbsfleet junction improvements scheme under the Highways Act 1980. In April 2019, the Department for Transport requested that the Planning Inspectorate commences the process for a Public Inquiry (unless all statutory objections are withdrawn). If consent is granted, construction of the scheme is anticipated to commence in 2019-2020. This may coincide with the construction of Riverside Energy Park and therefore the applicant should work with Kent County Council to ensure any road closures or impacts are coordinated appropriately.
- 6.6. In April 2017, the Secretary of State for Transport announced the preferred route for the Lower Thames Crossing - a Nationally Significant Infrastructure Project. The latest consultation period on the crossing closed in December 2018 and a Development Consent Order is currently anticipated to be submitted in 2019. If consent is granted, construction of the crossing may also coincide with the construction of the A2 Bean and Ebbsfleet Junction improvement scheme and the construction of Riverside Energy Park. As a result, whilst the construction impact of the crossing in Dartford may be limited, the applicant should work with Kent County Council to ensure any road closures or impacts are coordinated appropriately.

Public Rights of Way (PRoW)

- 6.7. The main facility of the proposed Riverside Energy Park is not expected to have a significant impact on the PRoW network in Kent, as it would be located in the neighbouring authority of Bexley. However, the proposed Electrical Connection may cause significant disruption for users of the Kent PRoW network.
- 6.8. Concerns are raised over the locations of the Cable Route Temporary Construction Compounds (Chapter 3, Paragraph 3.5.39 of the Environmental Statement). Whilst the exact locations of these sites have yet to be confirmed, it is understood that they would be positioned within the application boundary. This could mean that the compounds might be sited on a PRoW and this could create an obstruction for path users.
- 6.9. The draft Development Consent Order (DCO) includes a list of PRoW that would be temporarily stopped up in connection with the project (Part 3 – Paragraph 11 and Schedule 4). Whilst it is understood that these temporary closures would be discussed with the Local Highway Authority in advance of closure, concerns are raised with the potential impacts of these path closures, as they would be an inconvenience for path users and cause disruption.
- 6.10. The applicant has indicated that temporary closures may be required for approximately one week (during the construction of the electrical connection) and stated that alternative routes will be provided for duration of the closure, to maintain network connectivity. While this approach is welcomed, specific details regarding the duration of the closures and the alignments of the alternative routes are not currently clearly defined.
- 6.11. To reduce the impact on the PRoW network, a ‘hierarchy of intervention’ is requested, which seeks the minimum impact during construction, in the first instance. This would comprise signage regarding keeping routes open, using local management to hold PRoW users for a short period (e.g. to allow vehicles to pass) and temporary closures with very short diversions immediately around works where there is no other option. Should temporary closures be required, it is requested that they are kept to a minimum distance and duration, to minimise disruption for path users. Alternative access routes (temporary diversions) should also be provided to avoid fragmentation of the PRoW network.
- 6.12. Details of temporary path closures, diversions and mitigation works should be discussed with the County Council PRoW and Access Service at the earliest opportunity and included within a Construction Traffic Management Plan (CTMP). For ease of reference, it is requested that the CTMP includes a dedicated chapter focused on PRoW measures. Early engagement should ensure that the impacts of the proposed development can be fully assessed in advance, with appropriate mitigation provided to minimise disruption for PRoW users.
- 6.13. There is a risk of surface damage along PRoW during the construction phase of the project, as a result of vehicle movements, temporary construction compounds and

general works associated with the installation of the electrical connection infrastructure. The applicant is reminded that there must be no disturbance of the PRow surface without the express permission of the County Council PRow and Access Service. This point is of particular significance when considering potential trenching works and the installation of new cable infrastructure. It would be the responsibility of the applicant to make good any damage to the surface of the right of way, which has resulted from the construction activity. On completion of the construction work, the surface of the PRow must 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.

- 6.14. It is understood that the route of the underground electrical connection would be ducted with the inclusion of access covers (as considered within the Environmental Statement, Chapter 6, Table 6.2). This design should allow the applicant to access the cabling infrastructure in the future, when maintenance or repair work is required, without disturbing the surface of the PRow. This design approach is welcomed by the PRow and Access Service, as it should minimise long term disruption for path users.
- 6.15. With regards to wider network connectivity, the roads surrounding the proposed development site provide vital links between off-road PRow. Concerns are therefore raised with the predicted increase in vehicular traffic movements along these routes during the construction phases of the project, as these could introduce safety concerns for Non-Motorised Users and deter people from passing along roads to access PRow.

Biodiversity

- 6.16. Where works are to take place on the roadside verges, there is potential for an impact on protected / notable species or habitats associated with Local Wildlife Sites. A detailed method statement is to be produced by the applicant. It must be implemented should the proposed works have an impact on the roadside verges.

Conservation and Heritage

- 6.17. Having reviewed the currently submitted information, the proposed groundworks are unlikely to have high impact on buried archaeology in view of the scheme being focused within disturbed ground and not very deep. Wherever deeper excavations are proposed, the archaeological programme of works and the programme of geoarchaeological works should ensure suitable assessment and recording of such remains. All archaeological and geoarchaeological works will be undertaken in accordance with written schemes of investigation agreed with the County Archaeologist and will be flexible to adjust to the scheme's impact on any archaeological resource.

Air Quality

- 6.18. The Borough Council has the statutory duty for air quality and is satisfied that the air quality assessment has been carried out in accordance with current best practice and guidance and the assessment considers the worse-case scenario where the site is fully served by road vehicles. The Borough Council notes that the impact from construction and operational traffic within the Borough is negligible and will not require mitigation.

Socio-economic

- 6.19. The County Council and Dartford Borough Council would like to engage with Cory Riverside Energy to, as far as is reasonably practical, ensure that the additional jobs created, both during the construction and operational phases of the development, be recruited locally. It is acknowledged that there may be specialised areas of work that limit the ability of local recruitment to a number of the additional jobs generated. The net additional jobs - after taking account of leakage, deadweight and displacement - would also be dispersed across a wide area; making the issue of local recruitment more complex. Kent County Council and Dartford Borough Council would welcome engagement with Cory Riverside Energy on this matter to ensure that opportunities for local employment and skills development are realised.
- 6.20. The impact of the additional construction jobs created by the scheme is viewed by the County Council and Borough Council as having a minimal effect on local community infrastructure - on the grounds that the jobs would be temporary and would vary in number over the planned 43-month construction period. The construction workforce is unlikely to migrate into the area on a permanent basis and would in any case be spread across a wide area, dissipating any potential impact of community facilities and service provision.
- 6.21. The additional permanent jobs required as part of the operation of the Energy Park are likely to have a low impact on the provision of community infrastructure and services that could be accommodated within existing infrastructure capacity in Kent. Cory Riverside Energy has assessed the impact of additional jobs on community infrastructure over a 3km area from the development site. The additional jobs created have been attributed to a Local Area, Wider Area and Wider Region, which are all in excess of 3km from the site (as shown on Figure 14.1 of the Environmental Statement). This would further dissipate the impact of the additional jobs on community infrastructure.

7. Conclusion

- 7.1. Kent County Council and Dartford Borough Council will continue to engage positively with the applicant and the Examining Authority and will welcome further engagement on the content of this LIR as the examination advances.