Riverside Energy Park

Applicant's response to Cheryl Osborne Deadline 3 Submission

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CORY
RIVERSIDE ENERGY

1 Applicant's response to Cheryl Osborne Deadline 3 Submission

Introduction

1.1.1 Cheryl Osborne submitted a letter to the Planning Inspectorate on 05 May 2019. The letter raises some questions about the existing Riverside Resource Recovery Facility (RRRF) and REP, which can be summarised as relating to the following matters:

- Odour and visible emissions ('smoke') from RRRF;
- Pollutants and particulates from RRRF;
- Operational noise impacts from RRRF and cumulative operational noise impact from RRRF and REP; and
- Proximity of schools to RRRF.

1.1.2 These matters are addressed below.

Odour and visible emissions from RRRF

Queries relating to odour and visible emissions from RRRF were raised by some respondents during the consultation period.

1.1.3 As stated at **Appendix J, Table J.9 Air Quality and Odour** of the **Consultation Report** (**5.1, APP-019-APP-032**) submitted with the DCO application:

"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."

1.1.4 Furthermore, as stated in **Appendix J, Table J.18 'The Project and Its Benefits'** of the **Consultation Report** (**5.1, APP-019-APP-032**) submitted with the DCO application:

"*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."*

1.1.5 This was further reiterated in the Applicant's Deadline 2 submission at **Paragraph 1.1.24 Responses to Relevant Representations** (**8.02.03, REP3-052**).

1.1.6 The Applicant also confirmed in **Paragraph 3.3.12** of **Chapter 3 Project and Site Description** of the **Environmental Statement** (**ES)** (**6.1, REP2-013**) in relation to REP that:

"The tipping hall is ventilated by drawing air and supplying it into the ERF combustion process. The resulting negative pressure within the tipping hall ensures that dust and odour are prevented from leaving the interior. By integrating the Anaerobic Digestion and ERF waste tipping in the same facility, the negative pressure arrangement can be used to control and combust odours from both processes."

1.1.7 The above negative air pressure approach is in operation at RRRF and ensures that odours do not exit the facility.

Pollutants and particulates from RRRF

1.1.8 As stated above, the Applicant's existing facility (RRRF) has been operating within its legal emission limits since becoming operational in 2011. RRRF is subject to stringent emissions limits set by an Environmental Permit granted and regulated by the Environment Agency. In addition, emission filters and other control mechanisms (as stated in **Paragraph 3.3.30 Chapter 3 Project and Site Description** of the **ES** (**6.1, REP2-013**)) are incorporated within the design of the facility to ensure that all emissions are controlled to be within the emission limits set out in the permit.

1.1.9 Air quality monitoring is continuous at RRRF and emissions are published on the Cory Riverside Energy website.[1] Monthly reports are prepared for the following emissions:

- Nitrogen Oxide;
- Carbon Monoxide;
- Ammonia;
- TOC's;
- Hydrogen Chloride;
- Sulphur Dioxide; and
- Particulate (dust).

1.1.10 The monthly emission reports illustrate the maximum average daily and half hourly emissions, shown with the allowable limit threshold. It should be noted that RRRF emits the same pollutants as those reported in the **Table 7.34, Chapter 7 Air Quality** of the **ES** (**6.1, REP2-019**).

[1] https://www.coryenergy.com/about-us/emissions/

1.1.11 REP will be controlled, as RRRF is, through the same procedure of emission limits set by an Environmental Permit granted by the Environment Agency.

1.1.12 The 'reasonable worst case' emissions from the ERF from REP have been subject to computer modelling to predict how the pollutants from the ERF will disperse in the atmosphere (see **Paragraphs 7.5.33-7.5.51 Chapter 7 Air Quality** of the **ES** (**6.1**, **REP2-019**)). The results of the modelling are that, as a result of the Proposed Development, there will be no exceedances of threshold levels set for the protection of human health. As such, it can also be confirmed that there would be no 'noxious gases' released by the Proposed Development.

1.1.13 The potential effects of emissions from the ERF have also been considered in conjunction with other potential local emission sources including road traffic, and emissions from RRRF and Crossness Sewage Sludge Incinerator. **Paragraph 7.9.63 Chapter 7 Air Quality** of the **ES** (**6.1, REP2-019**) concludes that no exceedances of relevant threshold levels are predicted, and no likely significant effects are anticipated.

1.1.14 Note that emissions levels of oxides of nitrogen (NO_x) will be significantly lower than predicted in the ES. This is due to the Applicant's commitment in its Environmental Permit to use specific technology to reduce such emissions even further, as set out in the **Environmental Permit and Air Quality Note** (**8.02.06, REP2- REP2-057).** Furthermore, the Applicant has committed to providing a Requirement in relation to air quality in the next revision of the Draft DCO (dDCO) to be submitted at Deadline 5.

1.1.15 The modelling of emissions from the combustion of biogas from the Anaerobic Digestion facility reveals that potential effects are restricted to the immediate vicinity of the REP site, which would be limited to biodiversity receptors in the Crossness LNR. Nevertheless, **Paragraphs 7.9.45-7.9.47 Chapter 7 Air Quality** of the **ES** (**6.1, REP2-019**) concludes that there would be no likely significant effects arising from the emissions from the Anaerobic Digestion facility. Notwithstanding this, the Applicant has committed to further lower NO_x emissions from the Anaerobic Digestion facility, as set out in the **Anaerobic Digestion Facility Emissions Mitigation Note** (**8.02.42**) submitted at Deadline 4 and a Requirement will be added to the next revision of the dDCO at Deadline 5

1.1.16 Further information relating to monitoring of emissions and particulates and how this is related to health can be seen in the Applicant's **Post Hearing Note on Public Health and Evidence (8.02.27, REP3-033),** submitted at Deadline 3. As with RRRF, REP (if consented) would publish monthly emission reports on the Cory Riverside Energy website[2] or similar.

[2] https://www.coryenergy.com

Operational noise impact from RRRF and cumulative operational noise impact from RRRF and REP

1.1.17 RRRF is subject to a noise condition as part of its planning consent, meaning that operational noise must remain within set levels at several nearby representative locations, except in an emergency or with the prior agreement of LBB. The Applicant can confirm that no noise complaints have been received since RRRF became operational in 2011.

1.1.18 For REP, a noise assessment was undertaken as part of the Environmental Impact Assessment (EIA) and is presented in **Chapter 8 Noise and Vibration** of the **ES (6.1, APP-045**).

1.1.19 The nearest noise sensitive 'receptors' (NSR), which are the locations used to measure and predict noise levels to assess the proposals during construction, operation and decommissioning of the project, were identified and agreed with the London Borough of Bexley's (LBB) Environmental Health Officer (EHO) and include the closest residential properties to the south of the Proposed Development. These receptors include Hackney House apartments (approximately 760 m south east of the nearest boundary or the REP site) and Jutland House apartments (approximately 860 m south east of the nearest boundary of the REP site), both of which are in close proximity to the junction of Norman Road and Picardy Manorway in Belvedere. The third NSR is represented by dwellings along St. Thomas Road (approximately 1,000 m south east from the nearest boundary of the REP site) in Belvedere.

1.1.20 The dominant environmental noise sources at the NSRs are associated with vehicular movements on the A2016 and aircraft flyovers.

1.1.21 The noise and vibration survey considered the existing baseline environment which included, but is not limited to, noise levels at RRRF. Therefore, the ES assessed the potential noise impact from RRRF together with REP. **Paragraph 8.9.46-8.9.49 Chapter 8 Noise and Vibration** of the **ES (6.1, APP-045)** concluded that the noise effects from REP have been calculated to be at least 5 dB below the background sound levels at the nearest NSR's during both the daytime and night-time during the operational of REP. Therefore, there are no likely significant effects arising from increased noise levels during operation of REP (as well as the construction and decommissioning of the Proposed Development).

1.1.22 The Applicant has confirmed that it will include an operational noise limit Requirement in the next revision of the dDCO to be submitted at Deadline 5.

Proximity of schools to RRRL

1.1.23 As part of the EIA, assessment methodologies and study areas were agreed with local EHO's at the relevant Local Planning Authorities. No significant adverse effects on schools were reported in the ES.