

# Riverside Energy Park

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## Applicant's response to London Borough of Bromley Deadline 5 Submission

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**Contents**

1 Applicant's response to the London Borough of Bromley's submission ..... 2

    1.1 Introduction ..... 2

    1.2 Applicant's Response ..... 2

# 1 Applicant's response to the London Borough of Bromley's Deadline 5 submission

## 1.1 Introduction

1.1.1 This document provides a response to the London Borough of Bromley's submission accepted at the discretion of the Examining Authority and published on 27 August 2019, which covers the following matters:

- Waste; and
- Possible impacts on London Borough of Bromley (Air Quality Management Area; and construction and management & transport logistic plans).

1.1.2 The Applicant responds to these points below.

## 1.2 Applicant's Response

### Waste

1.2.1 The Applicant welcomes the positive comment from the London Borough of Bromley that *"the development has the potential to deliver new and more sustainable waste capacity in the South–East London subregion."*

### Potential impacts on London Borough of Bromley

1.2.2 The Applicant welcomes the positive comments from London Borough of Bromley that *"it is not anticipated that the proposals would give rise to a significant impact on the operation of the road network within the Borough either in the construction or operational phase."*

1.2.3 The assessment of the Proposed Development has shown that traffic effects from the construction of both REP and the Electrical Connection and the operation of REP would be *de minimis* on routes within the London Borough of Bromley – as set out with **Chapter 6 Transport** of the ES (**6.1, REP2-017**) and **Appendix B.1, the Transport Assessment** to the ES (**6.3, APP-066**). In addition, since submission of the Application, the Applicant has agreed to a cap on vehicle movements to both the ERF and Anaerobic Digestion plant which means operational traffic is well below the 100% scenario. Given this, and the fact that before the agreement to the cap the London Borough of Bromley considered that the construction of both REP and the Electrical Connection and the operation of REP would be *de minimis*, it is not necessary or proportionate to identify traffic routeing in construction and management and transport logistic plans.

1.2.4 The location of the London Borough of Bromley AQMA (which contains the two Focus Areas referenced by the Respondent) is shown in **Figure 1**

overleaf<sup>1</sup>. The AQMA is declared for exceedances of the annual mean nitrogen dioxide objective of 40 µg/m<sup>3</sup>.

1.2.5 The nearest point of the AQMA is approximately 12 kilometres to the south west of the Energy Recovery Facility (ERF) emission point. The AQMA is well outside of the zone of impact of emissions from the ERF as shown in Figure 5 for annual mean NO<sub>2</sub> impacts in the **Applicant's Response to Air Quality Matters (8.02.70)** submitted at Deadline 7. NO<sub>x</sub> emissions from the ERF will therefore not have a significant impact on Bromley's AQMA or the two Focus Areas.

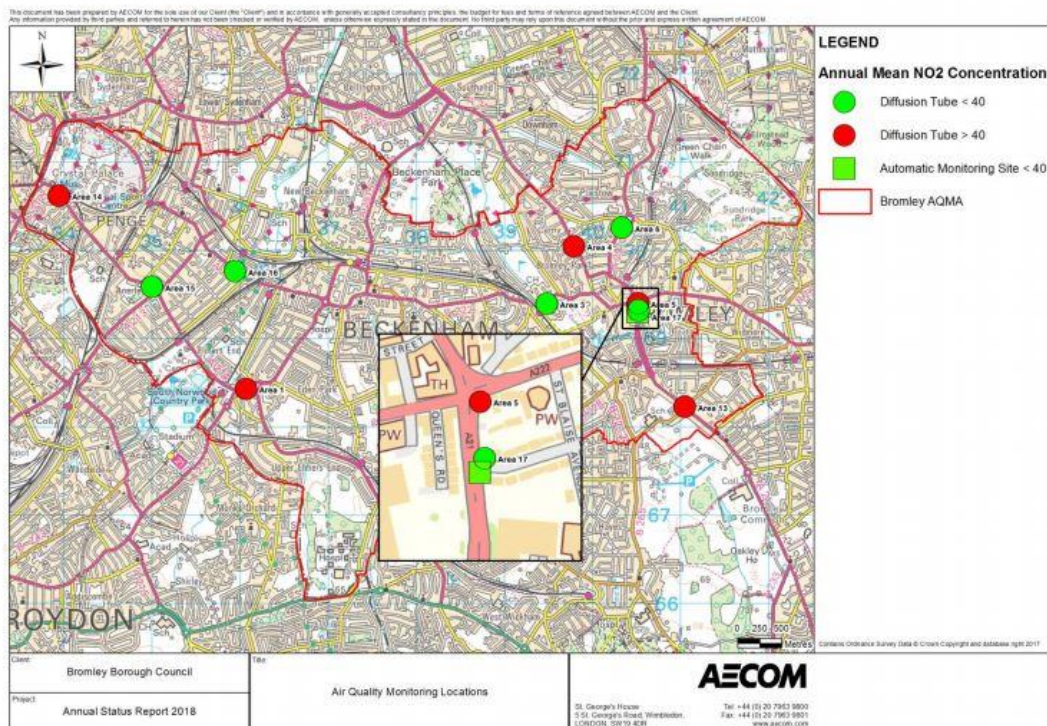


Figure 1: Bromley AQMA

1.2.6 In terms of air quality impacts during operation, the Applicant can confirm that the impact on air quality along the identified transport corridors in neighbouring boroughs has been considered. The results of the assessment are contained in **Appendix C.1** of the Environmental Statement (**6.3, REP2-036**) and **Chapter 7 Air Quality (6.1, REP2-019)** of the ES at Paragraph 7.9.13 which show that effects at all 27 receptors considered will be Negligible and therefore Not Significant. Construction traffic flows on an annual average basis would be lower than operational flows and therefore construction traffic impacts would be lower than operational traffic impacts.

<sup>1</sup> Bromley Air Quality Annual Status Report for 2017. Date of publications: October 2018

- 1.2.7 As the traffic effects in the London Borough of Bromley are *de minimis*, the increase in traffic is below the thresholds identified in IAQM guidance for an assessment of the impacts of traffic to be necessary (which would be an increase in Light Duty Vehicle flows of more than 100 annual average daily traffic or Heavy Duty Vehicle flows of 25 annual average daily traffic). As the increase in traffic in Bromley is below these thresholds, then there will not be a significant impact on Bromley's Air Quality Management Area or Focus Areas.
- 1.2.8 On the basis of the traffic and air quality outcomes set out above, the Applicant has not identified any basis on which air quality monitoring in respect of London Borough of Bromley should be considered further than it already has in the environmental assessments.