

RIVERSIDE ENERGY PARK DCO

LB Bexley Deadline 8b Submission

4th October 2019



LONDON BOROUGH OF
BEXLEY

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1 DEADLINE 8B SUBMISSION

- 1.1 In line with the request from the Examination Authority this note provides comments on behalf of the London Borough of Bexley (LBB) on additional information/submissions received at deadline 8a. These comments supplement those previously provided by LBB during the Examination.
- 1.2 Following the submission of the documents from the Applicant at deadline 8a LBB has been in dialogue with the Applicant. This dialogue has involved amendments being made to the Section 106 / Development Consent Planning Obligation agreement between the Applicant and LBB to cover matters and funds relating to Air Quality Monitoring and a decommissioning fund. Agreement has been reached on this wording and a signed copy of the Section 106 / Development Consent Planning Obligation Agreement is to be submitted by the Applicant at deadline 8b.
- 1.3 Dialogue with the Applicant has also continued with regard to the Statement of Common Ground between the Applicant and LBB. Agreement has now been reached between LBB and the Applicant and a signed copy of this Statement of Common Ground is to be submitted by the Applicant at deadline 8b.
- 1.4 Some amendments to the draft DCO have also been discussed and agreed between the Applicant and LBB. These amendments are to be incorporated in Appendix A of the Statement of Common Ground between the Applicant and LBB. A signed copy of this Statement of Common Ground is to be submitted by the Applicant at deadline 8b.
- 1.5 LBB are in agreement with the proposed amendments included for in the Outline Construction Traffic Management Plan (CTMP) submitted by the Applicant at deadline 8a and have no further comments to make on this document.
- 1.6 Comments from LBB on other documents submitted at deadline 8a are provided in the following sections of this submission. Provided the concerns identified in the following sections are addressed, many of which the Applicant has indicated that changes will be made at deadline 8b, then LBB have no further comments.

2 6.3 APP M TO B.1 (REV 1) OUTLINE OPERATIONAL WORKER TRAVEL PLAN

- 2.1 An updated version of the Outline Operational Worker Travel Plan (OWTP) was provided by the Applicant at deadline 8a. This document was updated to clarify that this plan is of relevance during both the commissioning and operational phases of the proposed development.
- 2.2 This change was required to reflect the amended wording in requirement 17 of Schedule 2 of the draft Development Consent Order (DCO) submitted by the Applicant at deadline 8a that requires submission and approval of the final version of the OWTP prior to the commencement of commissioning.
- 2.3 Schedule 11 of the draft DCO submitted by the Applicant at deadline 8a identifies plans and documents to be certified. Whilst this list includes reference as part of the transport assessment to the Outline CTMP and the supplementary note to the jetty outage review submitted at deadline 8a it does not include reference to the Outline OWTP.
- 2.4 On the basis that the Outline OWTP is referenced in requirement 17 of Schedule 2 of the draft DCO LBB consider that this document should be included in Schedule 11 of the DCO.



3 3.2 DRAFT DCO EXPLANATORY MEMORANDUM

- 3.1 An updated version of the draft DCO Explanatory Memorandum was provided by the Applicant at deadline 8a.
- 3.2 LBB note that in accordance with the amended wording to requirement 4 of Schedule 2 of the draft DCO, paragraph 3.1.3 (d) of the draft DCO Explanatory Memorandum should be amended where reference is made to requirement 4. This is to include for the words "*non-statutory designated sites and other habitats and species of principal importance*" after the words "*protect protected habitats and species*". The Applicant has confirmed that this amendment will be made in an updated version of the draft DCO Explanatory Memorandum to be submitted at deadline 8b.
- 3.3 LBB note that the text in paragraph 3.1.3 (f) (ii) (1) has been amended by the Applicant to remove the following wording: "*The ERF would be designed to operate for approximately 8,000 hours per year*". LBB consider that this text, should be reinstated in the draft DCO Explanatory Memorandum.
- 3.4 It is noted that the text for this part of the draft DCO Explanatory Memorandum comes from paragraph 3.6.9 of the Environmental Statement (ES). This paragraph states:
"The ERF would be designed to operate for approximately 8,000 hours per year. Typically, each boiler line would undergo one planned minor outage (approx. 7 days in duration) and one planned major outage (approx. 14 days in duration) per year, which can be conducted without taking the entire plant offline. Statutory inspections on common plant (necessitating a full shut down for approx. 3 days) are required at least every two years. Additionally, the turbine and generator would typically be taken out of service for up to 8 days per year for inspections and maintenance."
- 3.5 LBB consider that the full description as to the maintenance of the plant as provided in the ES should be included in the draft DCO Explanatory Memorandum. The reference to the 8,000 hours provides the result of the hours the plant can operate having regard to the number of shutdown days referenced in the remainder of the paragraph. Furthermore, the 8,000 hours referenced relates to the number of hours that the plant will operate in delivering the nominal throughput that the Applicant expects the plant to run at.
- 3.6 This is confirmed in paragraph 1.2.4 of the Applicant responses to ExA First Written Questions. Paragraph 1.2.4 of this document states:
"The nominal throughput (655,000 tpa) is based on the anticipated throughput of residual waste at an assumed (design) calorific value, with both lines of the ERF operating for 8,000 hours across the year."
- 3.7 For the above reasons LBB consider that the text "*The ERF would be designed to operate for approximately 8,000 hours per year*" should be reinstated to the start of paragraph 3.1.3 (f) (ii) (1) in the draft DCO Explanatory Memorandum.
- 3.8 In order to align with paragraph 6.3.1 (d) of the updated CTMP submitted at deadline 8a the work "*direct*" is to be removed from the last line of paragraph 3.5.22 of the draft DCO Explanatory Memorandum. The Applicant has confirmed that this amendment will be made in an updated version of the draft DCO Explanatory Memorandum to be submitted at deadline 8b.

- 3.9 In order to align with requirement 22 of the draft DCO the reference to “*Work Number 1*” in paragraph 3.5.31 of the draft DCO Explanatory Memorandum is to be amended to reference “*Work No. 1A and Work No. 1B*”. The Applicant has confirmed that this amendment will be made in an updated version of the draft DCO Explanatory Memorandum to be submitted at deadline 8b.
- 3.10 LBB consider that the words “*and where compost material is exported, to carry out the review every three years*” from the last sentence of paragraph 3.5.38 of the draft DCO Explanatory Memorandum is considered unnecessary and can be deleted. This is on the basis that this detail is already provided for in the earlier part of this sentence. The Applicant has confirmed that it will review and update this text in an updated version of the draft DCO Explanatory Memorandum to be submitted at deadline 8b.
- 3.11 Paragraph 3.5.40 of the draft DCO Explanatory Memorandum should read “*Requirement 25(9)*” as opposed to “*Requirement 25(8)*”. The Applicant has confirmed that this amendment will be included for in an updated version of the draft DCO Explanatory Memorandum to be submitted by the Applicant at deadline 8b.

