

# Riverside Energy Park

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## Applicant's response to Greenwich-Bexley Environment Alliance Deadline 8b Submission

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# 1 Applicant's response to Greenwich-Bexley Environment Alliance Deadline 8b submission

## 1.1 Introduction

1.1.1 Greenwich-Bexley Environment Alliance (GBEA) submitted '*Comments on any additional information/submissions received by the previous deadline*' at Deadline 8b (REP8b-027) which addresses the following matters:

- Legislation;
- Science;
- Environment;
- Health; and
- Local residents.

1.1.2 This document provides the Applicant's response and is structured to respond to each matter in the above order.

## 1.2 Legislation

1.2.1 The Applicant has demonstrated within the DCO Application submission and throughout the Examination that the Proposed Development is compliant with current, and where relevant, emerging policy and legislation.

1.2.2 The decision-making framework for the determination of REP is set out in the Planning Act 2008 and this DCO Application must be decided within that existing legislative framework. The Applicant cannot comment or speculate on future unknown policy or legislation and can only assess the Proposed Development against existing and emerging policy or legislation such as National Policy Statements (NPS) EN-1, EN-3 and EN-5.

1.2.3 The GBEA refer to potential future controls on toxic emissions and the possibility of more sophisticated pollution monitors. Whilst the Applicant notes that the Proposed Development is only required to comply with existing legislative and regulatory requirements, the Applicant is committed to reducing NOx emissions to levels below those required by current and emerging legislation, through investing heavily in NOx abatement technology (Selective Catalytic Reduction (SCR)) for the proposed ERF (Energy Recovery Facility) and the Anaerobic Digestion elements of the Proposed Development. This is considered to be the 'best' NOx abatement technology available and goes beyond what is a mandatory requirement of existing legislation.

1.2.4 GBEA believe that future legislation would provide further protection for endangered habitats, fauna and flora with specific reference to Crossness Local Nature Reserve (LNR). The Applicant reiterates that no works will take

place within the Thames Water Utilities Limited (Thames Water) managed Crossness LNR. The **Environmental Statement (ES)** reports the potential direct and indirect impacts and confirms at **Section 11.13 Chapter 13 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)** that there are no significant adverse impacts to Crossness LNR or any other biodiversity receptor.

### 1.3 Science

- 1.3.1 Extensive technical investigation and consideration of effects has been provided in the ES and throughout the examination. These assessments were undertaken by independent experts in their respective fields and informed by the most up to date literature and guidance. Concerns have been addressed regarding the potential impact of REP on human health and global warming in a number of the Applicant's responses to Relevant Representations and Written Representations submitted to the REP Examination, and addressed orally at the Open Floor Hearing on 4 June 2019, and the Issue Specific Hearing (ISH) on Environmental Matters on 5 June 2019.
- 1.3.2 Specific assessments that have been carried out and are included in the DCO Application, are reported in the following documents:
- **Chapter 7 Air Quality** of the **ES (6.1; REP2-019)**;
  - **Appendix K.1 Health Impact Assessment (HIA)** of the **ES (6.3; APP-094)**;
  - **Appendix C.3 Human Health Risk Assessment (HHRA)** of the **ES (6.3; REP2-040)**; and
  - **Appendix K.2 Qualitative Greenhouse Gas Emissions Assessment** of the **ES (6.3, APP-095)**.
- 1.3.3 No significant effects are identified on human health. The Applicant further produced the **Post Hearing Note on Public Health and Evidence (8.02.27, REP3-033)** submitted at Deadline 3, which provides reassurance and further evidence regarding the emission of ultrafine particles and also to draw attention to recent research commissioned by Public Health England (PHE) on potential health impacts associated with ERFs, which states:
- “While it is not possible to rule out adverse health effects from modern, well-regulated municipal waste incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable”.*
- 1.3.4 REP accords with national policy (National Policy Statements EN-1 and EN-3) to reduce carbon emissions and will, as a scheme that would be operational by 2024, provide a deliverable and immediate benefit in meeting climate change targets.

1.3.5 Furthermore, **Appendix K.2 Qualitative Greenhouse Gas Emissions Assessment** concluded that the operation of REP would contribute positively to the national, local and waste sector emissions inventory through the recovery of energy from waste, low carbon/renewable energy generation and energy storage.

## 1.4 Environment

1.4.1 The **ES** reports the potential direct and indirect impacts of the Proposed Development and confirms at **Section 11.13 Chapter 13 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)** that there are no significant adverse impacts to Crossness LNR or any other biodiversity receptor.

1.4.2 More broadly, the EIA found that there would be no significant adverse effects, other than some Moderate effects in relation to TVIA. GBEA do not provide any explanation of specific environmental improvements that may be hindered or reversed by the development of REP, or which species would be specifically affected by (air or water) pollution. **Paragraph 2.1.14** of the **Applicant's response to the ExA's Rule 17 Letter on Changes to the Application (8.02.61, REP6-003)** set out that the proposal would not undermine any of Thames Water's section 106 obligations in respect of Crossness LNR. The Applicant continues to state that the majority of effects are not significant (other than some TVIA) and any such effects are more than outweighed by the benefits of the proposal, which is in accordance with national policy.

1.4.3 The Applicant welcomes increased recycling rates. Within the **Project and its Benefits Report (7.2, APP-103)** and **Section 3** of the **Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** the Applicant has clearly set out how the ERF element of REP is the right scale and technology type so as to not disadvantage future recycling and the waste hierarchy. The new recovery capacity within REP will complement the Circular Economy, working alongside recycling activities in London to divert residual waste from landfill. Furthermore, the Applicant has introduced **Requirement 16** of the **dDCO (3.1, REP8b-004)** which goes above and beyond any other requirements/conditions set within other ERF DCOs/permissions. This Requirement is intended to reassure concerned interested parties, that the existing process described in **Section 3** of the **Applicant's response to Greater London Authority Deadline 3 Submission (8.02.35, REP4-014)** to ensure compliance with the waste hierarchy is being implemented.

1.4.4 Additionally, the Environmental Permit will allow only recyclable waste at the ERF where that waste is not suitable for recycling. Therefore, REP will support the drive to move waste further up the waste hierarchy by preventing residual waste (waste that is left after recycling) going to landfill and work alongside the Mayor's waste reduction and recycling targets and policy aspirations identified in the London Environment Strategy (LES).

## 1.5 Health

- 1.5.1 In response to the GBEA comment on “*probable correlation of COPD related deaths and the siting of incinerators*” the Applicant has responded to this at Deadline 3 in the **Applicant's Responses to Written Representations (8.02.14, REP3-022)**:

*“The Applicant notes that the BLF [British Lung Foundation] report does not actually refer to incineration plants at all. For the five lung diseases mentioned by the respondent, the BLF suggests that the primary cause for lung cancer and chronic obstructive pulmonary disease (COPD), which account for around two-thirds of deaths from lung disease, is smoking and that the primary cause for mesothelioma is asbestos dust. This significantly undermines the respondent's attempts to link incidence of these diseases to incinerators.*

*The Applicant notes that emissions from Riverside Energy Park (REP) would be a smaller fraction of total pollutants in the area and that the potential effects of those emissions have been fully assessed as part of the DCO Application”.*

- 1.5.2 The assessment reported in the **ES** has adequately incorporated all relevant residential developments that have been consented or are proposed, in accordance with the relevant Planning Inspectorate Advice Note. Incorporating residential developments into the ES means that they are subject to the EIA process and their cumulative effect is considered together with the reasonable worst case effects of the Proposed Development. The GBEA do not present any evidence to support their assertion that any potential effects are likely to affect low rent housing to a greater extent than any other groups. The EIA process considers the potential effects to all residents equally and concludes that there are no significant impacts (**Section 6.10-14.10, Chapter 6-14** of the **ES**).

## 1.6 Local residents

- 1.6.1 The Pre-application and Examination process has provided opportunities for local residents to inform the application for development consent for the Proposed Development. Such opportunities have been taken, through involvement with the Applicant's statutory and non-statutory consultation phases, and through the submissions made by various parties through Relevant Representations.
- 1.6.2 The matters raised in the petition have been addressed through the Applicant's submission and the Examination process. The Applicant considers that it has demonstrated the clear need for the Proposed Development, that the location is highly suitable, and that the proposal can be delivered in an appropriately sensitive way to adequately manage any potential environmental effects.

## **1.7 Summary**

- 1.7.1 The Applicant has demonstrated within this response and throughout the examination that the Proposed Development has been assessed within the current and emerging legislative and policy framework and is fully compliant with NPS EN-1, NPS EN-3 and NPS EN-5.
- 1.7.2 The Applicant has prepared a full and comprehensive EIA in accordance with relevant environmental regulations.
- 1.7.3 Issues relating to health have been addressed by the Applicant and submissions have shown that there are no significant effects identified to human health.
- 1.7.4 The Applicant has demonstrated a clear need for the Proposed Development, which will not impinge on the GLA's recycling targets but complement them and which can be delivered in an appropriately sensitive way to adequately manage any potential adverse environmental effects.