CORY

DECARBONISATION

CONSULTATION REPORT: 5.1 APPENDICES VOL. 4 (A-4 to B-21)

Cory Decarbonisation Project

PINS Reference: EN010128

March 2024

Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulation 2009

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APPENDICES VOL. 4

APPENDIX A-4 – SoCC, published 04 October 2023

CORY

DECARBONISATION

STATEMENT OF COMMUNITY CONSULTATION

OCTOBER 2023

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1. STATEMENT OF COMMUNITY CONSULTATION (SOCC)

1.1 INTRODUCTION

1.1.1 Cory Environmental Holdings Limited (hereafter referred to as Cory, or the Applicant) is part of the Cory Group, one of the UK's leading resource management companies, with an extensive river logistics network in London. Cory has invested heavily in London's waste recycling, energy generation and river logistics infrastructure. In addition to its commercial customers, Cory is also a trusted partner for several local authorities in London (serving a combined population of approximately 3 million people). It operates essential infrastructure that London substantially relies upon on a day-to-day basis.

1.1.2 Cory intends to apply to the Secretary of State for Energy Security and Net Zero in Q1 2024 for a Development Consent Order (DCO) under the Planning Act 2008 to authorise the construction and operation of the Cory Decarbonisation Project (the Proposed Scheme).

1.1.3 This Statement of Community Consultation (SoCC) has been prepared in accordance with section 47 of the Planning Act 2008, which requires applicants to prepare a statement explaining how they will consult with the local community about the proposed application and then to carry out pre-application consultation in accordance with that statement.

1.1.4 This SoCC therefore explains how Cory will consult the local community, including residents, businesses, community groups and political representatives about the Proposed Scheme in accordance with the statutory requirements.

1.1.5 This consultation provides an important opportunity for the local community to engage with and help shape the Proposed Scheme. Cory will have regard to the consultation responses in finalising the development proposals and submitting the DCO application to the Secretary of State.

1.1.6 Key consultation dates are outlined in Table 1 below; Table 2 provides full details of the public exhibitions.

Table 1 *Key dates for community consultation*

DATE	CONSULTATION ACTIVITY
04 October 2023	SoCC available in local venues for inspection
15/16/17 October 2023	Postcards distributed to residents, businesses and community groups
18 October 2023	**Statutory consultation period starts**
10 November 2023	**09.00 – 12.00:** Pop-up exhibition Pop-up events differ from public exhibitions in that they are held in high-footfall locations, enabling the project team to bring information to where people are.
	15.00 – 19.00: Public exhibition 1
11 November 2023	**09.00 – 12.00:** Public exhibition 2
15 November 2023	**18.00 – 19.00:** Public webinar
29 November 2023	**Statutory consultation period closes**

1.2 THE CORY GROUP

1.2.1 The Cory Group's ultimate parent company is Cory Topco Limited (Registered company number 11385842). All of the Cory Group companies are registered in England with their registered offices at Level 5, 10 Dominion Street, London, EC2M 2EF.

1.2.2 Cory's core activity, recovering energy from residual waste, is undertaken at their Riverside Campus, located adjacent to the River Thames at Belvedere in the London Borough of Bexley (LBB). The Riverside Campus consists of Riverside 1 and Riverside 2. Riverside 1, an energy from waste (EfW) facility generating up to 80.5 megawatt (MW) of electricity, has been operational since 2011. Riverside 2, an EfW facility with a generating capacity of approximately 76MW of electricity, is currently under construction and anticipated to be operational in 2026.

1.2.3 The Riverside Campus will provide over 1.5 million tonnes per annum (tpa) of residual waste management capacity, making a substantial contribution to addressing the waste needs of London and Southeast England.

1.2.4 In addition, Cory operates five river based waste transfer/ materials recycling facilities within central London and provides ship repair services at Gravesend.

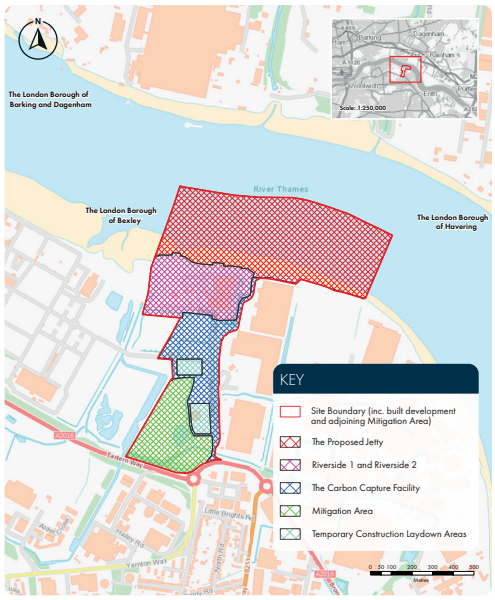
1.3 CORY'S DECARBONISATION PROPOSALS

1.3.1 Cory is seeking to maximise the carbon benefit of its energy from waste processes, with the intention to achieve net zero by 2040 or sooner.

The Proposed Scheme is a key part of achieving that target by capturing the carbon dioxide emitted from Riverside 1 and Riverside 2, then exporting it by ship for safe, permanent storage under the North Sea in depleted oil and gas fields.

Figure 1 shows an indicative site layout plan for Cory's decarbonisation proposals.

Figure 1 *Indicative site layout plan*



The Proposed Scheme comprises four key components:

- **The Carbon Capture Facility**: The construction of infrastructure to capture at least 95% of carbon dioxide (CO_2) emissions from Riverside 1 and Riverside 2. The Carbon Capture Facility will be one of the largest carbon capture and storage (CCS) projects in the UK.
- **The Proposed Jetty**: A new structure within the River Thames that is required to enable ships to export the CO_2 captured as part of the Carbon Capture and Export Facility to offshore undersea storage locations.
- **Environmental Mitigation Area**: Land provisionally identified as part of Cory's early assessment work for potential mitigation, compensation and biodiversity net gain (BNG) requirements.
- **Temporary Construction Compounds**: These areas will be used during the construction phase of the project for offices, warehouses, workshops, open air storage and car parking. The areas will be reinstated to their original use following completion of the construction works for the Proposed Scheme or permanently used as part of the Proposed Scheme.

1.3.1.1 Carbon Capture Facility

The Carbon Capture Facility is the installation of post-combustion carbon capture technology to capture CO_2 from Riverside 1 (in operation) and Riverside 2 (due to be operational by 2026). It will capture a minimum of 95% of CO_2 emissions from each of Riverside 1 and Riverside 2. Furthermore, with the feedstock to Riverside 1 and Riverside 2 comprising c.50% biogenic content, the Carbon Capture Facility would result in net-negative CO_2 emissions of approximately 0.6Mt per year of CO_2. As such, the Proposed Scheme will be part of a regional effort to enable the decarbonisation of emissions in London and Southeast England.

The Carbon Capture Facility will comprise of two sets of infrastructure, one each for Riverside 1 and Riverside 2, (in summary):

- flue gas pre-treatment;
- CO_2 compression, conditioning and liquefaction plants; and
- supporting plant, such as solvent storage, water treatment plant, and wastewater treatment plant.

An alternative configuration of the Carbon Capture Facility using a single set of infrastructure to serve both Riverside 1 and Riverside 2 will be considered.

There will also be storage onsite for the liquified CO_2 before it is exported for permanent storage under the North Sea.

Some of the plant will be substantial in size and indicative site layout options will form part of the consultation.

The development is proposed on land located immediately south of the Riverside Campus and west of Norman Road. It includes land designated as Erith Marshes SINC (Site of Importance for Nature Conservation), Crossness Local Nature Reserve (LNR), Metropolitan Open Land (MOL) and Flood Zone 3, including areas designated as Functional Floodplain (Flood Zone 3b). Part of the site lies within the Belvedere Industrial Area, land designated in the Bexley Local Plan as a Strategic Industrial Location.

Operation of the Carbon Capture Facility and the Proposed Jetty will have no impact on the waste throughput (and associated traffic and vessel movements) of Riverside 1 and Riverside 2.

1.3.1.2 Proposed Jetty

The Proposed Jetty will be located within the River Thames and Tidal Tributaries SINC, in the northern area of the Site.

This area contains two existing jetties that extend into the River Thames: Middleton Jetty (approximately 280m length), located adjacent to (and north of) Riverside 1; and the disused Belvedere Power Station Jetty (also known as the Aviva jetty), which is located adjacent to (and north of) Iron Mountain Records Storage Facility. Middleton Jetty is designated as a Safeguarded Wharf. Both jetties bridge across England Coast Path (FP3 / NCN1).

Approximately 75% of the waste delivered to Riverside 1 is delivered to Middleton Jetty via tug pulled barges, removing the equivalent of 100,000 heavy goods vehicle (HGV) journeys per annum from the road. Currently, there are approximately five tug and barge arrivals and five departures a day. Eight barges can be moored alongside Middleton Jetty at any one time (utilising the river and shore facing sides of this jetty). The waste is unloaded at Middleton Jetty and transferred on dock tractors and trailers to the Riverside 1 tipping hall. Middleton Jetty is also used for the transport of incinerator bottom ash (IBA) from Riverside 1 to a recycling facility at the Port of Tilbury. River-based transport will be used in the same way for Riverside 2 when operational.

It is not possible for Middleton Jetty to be used for the Proposed Scheme given the frequency of its current uses, as such the Proposed Jetty is to be built. Options for removal or retention of the Belvedere Power Station Jetty are being explored as part of the design evolution, and this will form part of the consultation.

1.3.1.3 Mitigation Area

The Mitigation Area is located to the south and west of the Site.

This area comprises entirely of the Erith Marshes SINC and MOL. The Mitigation Area sits within Flood Zone 3 and is designated as Functional Floodplain (Flood Zone 3b).

Footpath FP2 also runs through this area in an east to north west direction, and it is crossed by the Southeast London Green Chain, in a south to north east direction.

This area is being considered as part of Cory's overall package of landscape and ecological proposals in the local area. The Mitigation Area on site is being designed to enable a site masterplan that will integrate good design, mitigate impacts and compensate for any losses, providing at least a 10% biodiversity net gain (BNG).

1.3.1.4 *The temporary construction compounds*

Two core temporary construction compounds will be located centrally within the Site Boundary, both located on the western side of Norman Road. After their use as offices, warehouses, workshops, open air storage and car parking they will be incorporated into the Proposed Scheme.

The Temporary Construction Compounds comprise three land parcels, all located on the western side of Norman Road.

The rest of the site footprint could also be used for temporary construction laydown as the project progresses.

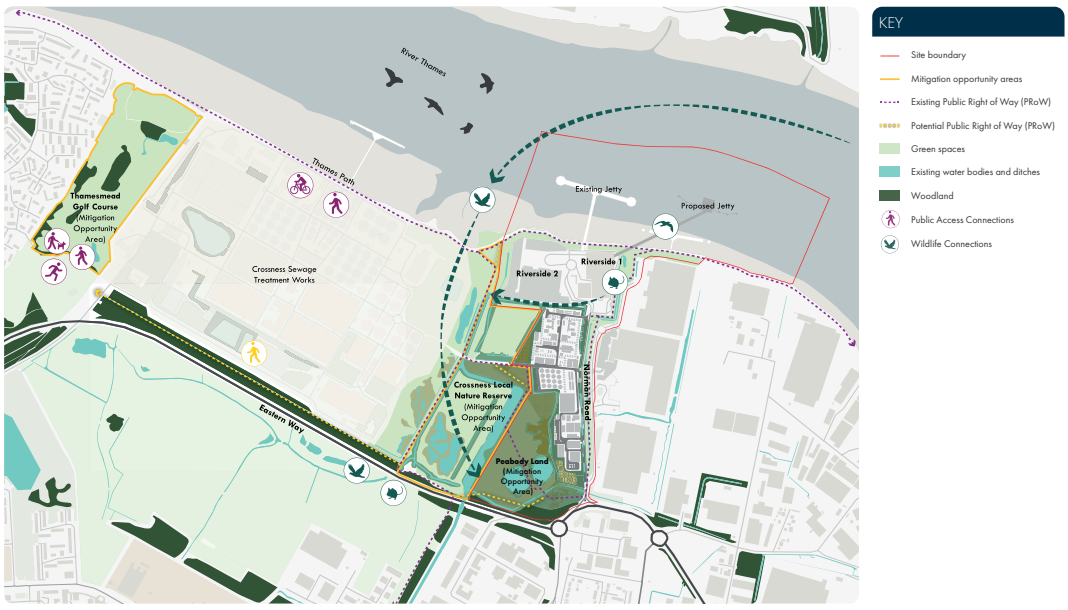
1.3.2 Cory forecasts that its decarbonisation proposals would:

- have the potential to capture c.1.3 million tonnes of carbon dioxide every year by 2030;
- decarbonise its energy from waste processes, reducing the CO_2 emissions of waste processed for households and businesses in London and Southeast England;
- help contribute to achieving the UK's net zero targets; and
- benefit local green spaces.

1.3.3 Construction is targeted to begin in 2026, with two programmes being considered; either to build both sets of carbon capture plant at the same time, or to phase them. The Carbon Capture Facility is intended to be fully operational by 2030.

1.3.4 As part of the proposals, Cory is considering opportunities for delivering ecological, landscape and access improvements outside the Site Boundary; to both mitigate the impacts of the Scheme and create enhancement locally. The areas of land being considered for this are shown bounded yellow in Figure 2. Cory is discussing this with relevant landowners and stakeholders, including Peabody, mindful of their plans and strategies to deliver localised benefits. In the statutory consultation, comments will be invited as to the type of improvements that would be welcomed for these areas.

Figure 2 *Areas of land enhancement being considered*



1.4 THE PLANNING PROCESS

1.4.1 Development Consent Order (DCO)

On 6 October 2022, the Secretary of State for Energy Security and Net Zero issued a direction under section 35 of the Planning Act 2008, that the Proposed Scheme is a project of national significance and must obtain consent through a Development Consent Order (DCO) under the Planning Act 2008. Cory is therefore preparing a DCO application, which must go through the following stages:

- **Consultation** – Cory will consult local communities, stakeholders and statutory consultees on draft proposals (as required by S42 and S47 of the Planning Act (2008)).
- **Submission** – Feedback from the consultation will be collated and considered to determine the final details of the DCO application that will then be submitted to the Planning Inspectorate.
- **Acceptance** – The Planning Inspectorate has 28 days to determine whether the submitted DCO application meets the required standards to proceed to examination. This includes a judgement on whether the consultation was adequate (informed by comments on this element by the local planning authorities).
- **Pre-examination** – When the DCO application is accepted by the Planning Inspectorate, stakeholders can register as an interested party and submit representations, keeping them up to date on progression of the application and providing opportunities for involvement.
- **Examination** – An inspector, or panel of inspectors, from the Planning Inspectorate, each appointed by the Secretary of State, then has six months to examine the application. During this time members of the public can submit further comments in writing and request to speak at public hearings.
- **Decision** – Within three months of the end of the examination, the inspector(s) must submit a recommendation to the relevant Secretary of State, who then has a further three months to make their decision.
- **Post-decision** – Once the decision has been made, there is a right to a legal challenge. Upon approval, there is usually a period for the local authority to determine final details of the development, then construction can begin.

1.4.2 Cory has been engaging with local stakeholders since 2022, with early, non-statutory consultation held from 5 June to 14 July 2023. A phase of statutory consultation will take place in the autumn, from 18 October to 29 November 2023. Using the information collected through these consultation phases, Cory intends to finalise its DCO application, ready to submit to the Planning Inspectorate in the first quarter of 2024.

1.4.3 Legal requirement to consult

1.4.3.1 Under section 47 of the Planning Act 2008, Cory is required to produce this Statement of Community Consultation (SoCC), outlining how it intends to engage with local communities in the vicinity of the Proposed Scheme during the statutory consultation.

1.4.3.2 Section 47 also requires that Cory consult on the SoCC with the host local authority for the area in which the Proposed Development is located, prior to the statutory consultation taking place. Cory is then required to take account of the feedback received from the local authority before finalising and adopting the SoCC, which will govern how the statutory consultation is conducted.

1.4.3.3 During the statutory consultation, the SoCC must be publicly available for inspection in a convenient location for those living in the vicinity of the Proposed Scheme. The SoCC will be available for inspection at the locations listed in Table 3. Cory is also required to publish information on where the SoCC can be viewed in a local newspaper, which will be the *Bexley and Bromley News Shopper*. The SoCC will also be published on the website for the Proposed Scheme, **www.corydecarbonisation.co.uk**.

1.4.3.4 Under section 48 of the Planning Act 2008, Cory must also publish formal notices in both local and national newspapers, highlighting the launch of the consultation, directing consultees and residents to where information can be found about the Proposed Scheme, and inviting feedback on it. *Bexley and Bromley News Shopper*, *The Guardian*, *Lloyd's List*, *Fishing Journal* and *London Gazette* have all been selected for this purpose. These notices will be published at the launch of the statutory consultation and copies will also be sent to all consultees required by Regulation 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

1.4.3.5 Under section 44 of the Planning Act 2008, Cory must also notify all affected land interests, and those entitled to make a relevant claim for compensation of the launch of the consultation inviting feedback on the Proposed Scheme. These notices will also be made at the launch of the statutory consultation.

1.4.3.6 Under section 49 of the Planning Act 2008, Cory is required to have regard to the responses to this consultation and its associated publicity when finalising its application for the Proposed Scheme. Consequently, a Consultation Report will be drafted to accompany the DCO application, detailing the feedback received during the statutory consultation and the Applicant's responses to that feedback.

1.5 ENVIRONMENTAL INFORMATION

1.5.1 Under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Proposed Scheme is classed as an Environmental Impact Assessment (EIA) development. This means that it must be subject to an EIA to ensure the likely significant effects of the Proposed Scheme are understood and that the appropriate mitigation of those effects is put in place. The results of this work will be laid out in an Environmental Statement (ES) submitted as part of Cory's DCO application.

1.5.2 To begin this process, Cory submitted a Scoping Report (available at: **Environmental Impact Assessment Scoping Report (planninginspectorate.gov.uk)**) and request for an EIA Scoping Opinion to the Planning Inspectorate in April 2023. The Scoping Opinion (available at: **EN010128-000026-EN010128 - Scoping Opinion.pdf (planninginspectorate.gov.uk)**) was received on 26 May 2023.

1.5.3 In accordance with Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Cory is collating the preliminary information collected through the EIA process into a Preliminary Environmental Information Report (PEIR). This document will form part of the statutory consultation materials and the feedback collected will help to inform the final ES.

1.6 CONSULTATION OBJECTIVES

1.6.1 Cory's objectives for the statutory consultation are to:

- provide consultees with sufficiently detailed information to understand the Proposed Scheme and its potential impacts;
- provide consultees with an opportunity to influence elements of the Proposed Scheme that are under development and to understand which elements of the Proposed Scheme are fixed, and the reasons why;
- clearly signpost the different ways in which consultees can comment on the proposals; and
- continue a meaningful dialogue with the local community that is maintained through the submission and examination phases of the consenting process.

1.7 WHAT WE WILL CONSULT ON

1.7.1 The statutory consultation will take place between 18 October 2023 and 29 November 2023. Consultation responses should be submitted to Cory by **23.59 on 29 November 2023**. Cory will consider consultation responses received after this date wherever possible.

1.7.2 Cory's statutory consultation will include detail on the Preliminary Environmental Information Report (PEIR), that outlines preliminary results of the on-going Environmental Impact Assessment (EIA) process. Cory will seek feedback on this document from statutory consultees and the public, with a particular focus on the following elements:

1.7.2.1 Carbon storage tanks

Onsite storage is required to store the liquified CO_2 prior to onwards ship export via the Proposed Jetty. This will be stored in insulated, pressurised, above ground storage tanks. Two options are being considered:

- Multiple tall vertical tanks; or
- Multiple spherical tanks.

1.7.2.2 Environmental mitigation

Cory is exploring the creation of improved green spaces in the local area, including in and around Thamesmead, with a focus on landscape, ecological and access outcomes. Early discussions have started with key stakeholders such as the Friends of Crossness LNR, Peabody and Thames Water.

Cory is interested to understand priorities and opportunities for the green spaces around the Site to inform design choices for the relevant areas.

1.7.2.3 Belvedere Power Station Jetty (disused jetty)

The Proposed Jetty is located at the northern edge of the Site, within the River Thames, crossing over the Thames Path and the Belvedere Power Station Jetty, which has been disused for some time. There are options for whether that jetty is dismantled or retained, either wholly or partially, potentially providing ecological and cultural heritage assets. Cory is interested to understand priorities and opportunities for this structure, to inform proposals for its future.

1.7.2.4 Design themes

The DCO application to be submitted will present a coherent development that can be suitably assessed, with necessary flexibility on detailed design elements. These design details would be approved at a later date under requirements of the DCO and in accordance with Design Principles that will form part of the DCO application. The statutory consultation will set out our initial thoughts on the themes against which the Design Principles will be developed, and welcome comment on those themes.

1.7.3 Cory will hold public exhibitions during the statutory consultation period at the times and locations set out in Table 2:

Table 2 *Public exhibition details*

DATE	TIME	VENUE
Friday 10 November 2023	**09.00 – 12.00**	B&Q Belvedere, Station Road, off Lower Road, Belvedere, DA17 6DF
Friday 10 November 2023	**15.00 – 19.00**	Belvedere Community Centre, Mitchell Close, Belvedere, DA17 6AA
Saturday 11 November 2023	**09.00 – 12.00**	Belvedere Community Centre, Mitchell Close, Belvedere, DA17 6AA
Wednesday 15 November 2023	**18.00 – 19.00**	Webinar, via Zoom ** A direct website link for people to register will be provided, once consultation has launched, which will then give them Zoom access details. This will also be linked on the project website. Spaces are not limited for this session, which will include a presentation and Q&A. Questions will be answered live in the session.*

1.7.4 In the event that a public exhibition(s) is cancelled or rescheduled due to unforeseen circumstances, Cory will seek to alert consultees as early as possible by updating the website for the Proposed Scheme.

1.7.5 Display boards at the public exhibitions will provide further details on the different elements of the Proposed Scheme, the matters on which feedback is particularly sought, and indicative timescales for the project programme. The public exhibitions will be attended by representatives from the project team who will be available to answer questions on the Proposed Scheme and the consultation materials.

1.8 HOW WE WILL CONSULT

1.8.1 Cory will provide information about the Proposed Scheme and the statutory consultation using a range of methods:

- **Public exhibitions**: Anyone with an interest in the Cory Decarbonisation Project will be welcome to attend the exhibitions. Visitors will be able to ask questions of the Cory team and encouraged to submit comments via a feedback form.
- **Information postcard**: Information postcards will be mailed to addresses within the consultation zone set out in Figure 3 to inform the local community about the Proposed Scheme and the statutory consultation.
- **Consultation brochure**: A consultation brochure will be produced that summarises the information being consulted on. Interested parties will be encouraged to pick up a printed copy from a public exhibition, the inspection venues or to view it online at **corydecarbonisation.co.uk**.
- **Feedback form**: This will contain questions to capture feedback on the Proposed Scheme. It will be available in print from a public exhibition, the inspection venues and for completion online at **corydecarbonisation.co.uk**.
- **PEIR**: The Preliminary Environmental Information Report contains an overview of the nature and scale of the Proposed Scheme and an initial assessment of the likely significant environmental effects of it. The PEIR will be available to view online on our consultation website. We will respond to reasonable requests for further copies of documents. Requests for hard copies will be reviewed on a case-by-case basis. A reasonable copying charge may apply, to be paid by the recipient in advance.
- **Section 48 notice**: Cory's intention to submit a DCO application for the Proposed Scheme and providing details on how to engage with the statutory consultation will be made through the section 48 notice published in local and national newspapers (*Bexley and Bromley News Shopper*, *The Guardian*, *Lloyd's List*, *Fishing Journal* and *London Gazette*).
- **Website**: The project specific website (**corydecarbonisation.co.uk**) will be regularly updated with the latest news and will provide access to all consultation documents, allow completion of an online feedback form and present responses to Frequently Asked Questions that have been asked to date and which arise during the statutory consultation.
- **Social media**: Details of the consultation, including reminders of when and where events are taking place, will be publicised via the main Cory Group X (formerly *Twitter*) account: @CoryGroupUK.
- **Posters**: Posters advertising the public exhibitions will be displayed in local venues within the consultation zone and at the inspection venues.

In addition to being available online, the consultation brochure and feedback form will be available to view at these locations throughout the consultation period (18 October to 29 November 2023). The SoCC will also be available at the locations listed in Table 3 from 04 October 2023:

Table 3 *Inspection venues for consultation documents*

VENUE NAME AND LOCATION	OPENING TIMES
Upper Belvedere Community Library Woolwich Road Upper Belvedere DA17 5EQ	Monday **09.30-17.30** Tuesday **09.30-17.30** Wednesday **CLOSED** Thursday **CLOSED** Friday **09.30-17.30** Saturday **09.30-14.00** Sunday **CLOSED** ***Opening times at this venue are subject to change and we recommend checking with the venue via telephone, email or online in advance of visiting.***
London Borough of Bexley Civic Offices 2 Watling Street Bexleyheath Kent DA6 7AT	Monday **09.00-17.00** Tuesday **09.00-17.00** Wednesday **09.00-17.00** Thursday **09.00-17.00** Friday **09.00-17.00** Saturday **CLOSED** Sunday **CLOSED** ***Opening times at this venue are subject to change and we recommend checking with the venue via telephone, email or online in advance of visiting.***
Belvedere Community Centre Mitchell Close Belvedere DA17 6AA	Monday **08.00-21.00** Tuesday **08.00-21.00** Wednesday **08.00-21.00** Thursday **08.00-21.00** Friday **09.00-15.00** Saturday **09.00-15.00** Sunday **CLOSED** ***Opening times at this venue are subject to change and we recommend checking with the venue via telephone, email or online in advance of visiting.***

1.9 WHO WE WILL CONSULT WITH

1.9.1 The consultation process has been designed to engage with those local communities who may be most affected by the Proposed Scheme, with a particular focus on those within the consultation zone (see Figure 3). Invitations to the public exhibitions, and to be kept informed about the Proposed Scheme, will be sent to:

- local residents with postal addresses within the consultation zone;
- local businesses with postal addresses within the consultation zone; and
- local interest groups that are active within the consultation zone.

1.9.2 In addition, Cory will email elected representatives (Councillors and Members of Parliament) with constituencies or wards within the consultation zone to inform them of the consultation launch and share relevant details.

1.9.3 Cory will inform local communities located beyond the consultation zone about the Proposed Scheme, and the statutory consultation, through the section 48 notice, social media and updates to the Proposed Scheme website **corydecarbonisation.co.uk**.

Figure 3 *Consultation zone*

1.10 WHAT WE WILL DO WITH CONSULTATION RESPONSES

1.10.1 Cory will have regard to all written consultation responses received as feedback forms, emails clearly labelled to the project email and letters sent to the Freepost address (contact details are provided in section 1.12 below). Feedback will be carefully considered by the project team in refining the Proposed Scheme ready for submission.

Details of all consultation responses will be included in the Consultation Report that will be submitted to PINS as part of the DCO application. The Consultation Report will be a public document, but personal information will not be shared publicly unless specifically requested by the Planning Inspectorate.

1.11 FURTHER DETAILS

1.11.1 Further information can be found on the project website: **corydecarbonisation.co.uk**

1.12 CONTACT DETAILS

1.12.1 Consultation responses should be submitted to Cory by **23.59 on 29th November 2023**. Questions and comments on this document, the Proposed Scheme and the consultation can be submitted to Cory using the details below:

Email: decarbonisation@corygroup.co.uk

Freepost: FREEPOST CORY CCS

Freephone: 0330 838 4254

Online: corydecarbonisation.co.uk

corydecarbonisation.co.uk

APPENDICES VOL. 4

APPENDIX A-5 – S42 responses table

Organisation	Comment	Applicant Response
CBRE (on behalf of Peabody Trust and Tilfen Land Limited)	Since our meeting on 20 November 2023, you will have had the opportunity to consider our feedback to the consultation into your proposals for the decarbonisation plant. As indicated in that response, the Peabody team wants to consider in more detail the PEIR that you have published, and we are in the process of drawing together our queries and comments to you, in relation to that document. It is going to be particularly important for Peabody to understand what alternative development layouts have been considered, and (ultimately) why Cory has chosen the option which has been promoted through the consultation. The detail on alternatives is very limited in the PEIR, and we would be grateful if you could arrange for more information to be shared on the site selection process for the project, so that this can be fully considered. In order for Peabody/Tilfen to consider providing further support for the project as currently proposed, it will be essential to have a well-developed understanding of your proposals and the reasons for them. You will also appreciate that, given the very close links which Peabody and Tilfen Land have with the local community, it will be important for Peabody/Tilfen to be able to demonstrate this, as engagement with stakeholders develops. At the meeting on 20th November your team took us through draft terms for a tri-partite legal agreement, and we undertook to provide our feedback within three weeks of the meeting. Having reconvened as a team to prepare a response, we have had cause to reflect on the appropriateness of considering the terms of a legal agreement before matters of a more practical nature have been discussed and can be properly reflected in any agreement going forward. For example, it is extremely important that we quickly develop a mutual understanding of the detail of the works on Peabody/Tilfen land, when enhancement and mitigation would be delivered, how it would be secured, and what arrangements for maintenance and management would be made. We believe our ability to articulate an agreed position on these points with other stakeholders, is going to influence the nature of the journey this project will have through its consenting process. We will provide feedback on the legal document, but this will now be after the Christmas break, and when progress on other fronts has been made. If in the meantime you can address our information request set out above, this will help to accelerate the response being prepared on the PEIR.	The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for each of the Carbon Capture Facility and Proposed Jetty is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5) and Jetty Site Alternatives Report (Document Reference 7.6) respectively. The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the chosen Carbon Capture Facility development zone. Details of habitat creation and enhancement measures proposed both onsite and offsite are provided in the Outline LaBARDS(Document Reference 7.9). The Applicant has been seeking to engage proactively and positively with Peabody/Tilfen Land Limited on these proposals and will continue to do so in the run up to and throughout the Examination process.
Creekside Development (Kent) Ltd	Creek strongly objects to the matter proceeding further, in the way outlined in your letter of 18th October, which would have a fundamentally adverse and detrimental effect on Creek's land and its value and Creek's use, possession, development and ownership of it and Creek strongly objects to any compulsory acquisition of Creek's land or rights over Creek's land or temporary occupation of Creek's land, in the way outlined in your letter of 18th October.	Cory notes Creek Side 's position and Creek Side's objection to the proposed compulsory acquisition of the Creek Side's site; Cory has already met and discussed this with Creek Side . Cory has undertaken a robust optioneering process that has considered all relevant policy, environmental, land and operational constraints and that has concluded in the need for Creek Side's land in both the construction and operational phase of the Proposed Scheme and has confirmed this to Creek Side. As a result, Cory will continue to seek constructive engagement with Creek Side and will seek further meetings with Creek Side following the submission of the DCO application to discuss the proposed acquisition. Compulsory acquisition powers will only be used if it is not possible to reach an agreed position on a voluntary acquisition, which Cory remains willing to discuss.
	We, together with solicitors for Seamus Gannon (owner of a neighbouring site similarly affected by the Project) have obtained Counsel's advice from Melissa Murphy KC of Landmark Chambers with regard to the matter and reserve the right to make further representations during the course of the matter as and when the further information is available to us.	Noted
	Creeks owns the freehold land known as Land on the West Side of Normal Road Belvedere registered under Land Registry title number SGL806760 ("**Property**").	Noted
	The Property has planning permission for Class B1 development from the London Borough of Bexley. Creek purchased the Property with the intention to develop it for use as a primary base for its own business operations and Creek still has the intention to do so.	Cory notes Creek Side's intended future use for the site and will discuss this as part of future meetings with Creek Side, also noting that the Creek Side site is let to a Cory group company until 2029 with a tenant option to renew the lease.
	The Property is also subject to a change to Lloyds Bank plc.	Noted
	Creek was already under contract to buy the Property when it was notified in 2019 by Ardent (acting for Cory) that the Property was intended to be used temporarily, which was considered to be compulsory acquisition, and these powers would be sought as part of the Development Consent Order ("**DCO**") application for the previous development of Riverside Energy Park.	Noted
	As a result of this, Creek was unable to develop the Property for its own use, as it had intended to do and instead, it was compelled to grant a lease to Cory and the Property is currently subject to this lease dated 8.10.2019 expiring in 2019 (with an option to renew the lease subject to the terms as set out in the lease). This lease has since been transferred by Cory to Riverside Energy Park Limited ("Riverside") which we understand is directly associated with Cory. This lease was granted in good faith by Creek on the basis and understanding that this would put an end to any further threat to the Property relating to any developments by Cory or its associates. Despite this and despite Cory (and then Riverside) being in contact with Creek as Creek's tenant for several years, at no point until earlier this year in March 2023, was Creek given any prior warning or information about the current proposals for this Project and how this could adversely affect the Property.	Creek Side was one of the first landowning stakeholders to be contacted in connection with the Cory Decarbonisation Project and the Applicant has sought to maintain productive discussion throughout preparation of the application.
	In addition to the points above, the objections that we wish to raise are summarise as follow:	Noted
	1. The Section 35 Direction is based on a materially out of date description of the Project and Cory seems not to have followed the Secretary of State's advice to seek confirmation that the Project and development that is the subject of the proposed application is the same as that for which the Direction was given.	This point is inter-related with paragraphs 2(a), (b) and (c)(i) and is consequently addressed together. The Section 35 Direction is not based on a materially out of date description. The Direction, and the request for it, clearly included discrete reference to a Carbon Capture Project which incorporated the same elements that are described in the Preliminary Environmental Information Report (PEIR), and which will form the application for the DCO. The Direction refers to the 'PNS developments', being the Carbon Capture and Storage Project and the Hydrogen Project. Each of them, separately being a 'PNS development' for which development consent is required. The Carbon Capture and Storage Project can therefore form the DCO application that is brought forward. This point has been confirmed by the Secretary of State for Energy Security and Net Zero, by way of letter dated 28 February 2024.

2. Counsel has advised that the changes in description of the Project between the letter to Creek of 15th March 2023 and the letter of 18th October 2023 are quite significant and she does not understand why the Project will fall to be treated as a National Significant Infrastructure Project ("NSIP") and thus come within the Planning Act 2008 DCO regime. Counsel has conducted some investigation and has looked at some additional published information from Cory with regard to the Project, namely the Preliminary Environment Information Report "PEIR" in that this is the most obvious source of more detailed information than was contained in the letter.	Due to the nature and scale of the Proposed Scheme there was uncertainty as to whether it would fall within the exiting definition of a Nationally Significant Infrastructure Project (NSIP) per PA2008. By way of letter dated 6th October 2022, the SoS made a Direction, under Section 35(1) of the PA2008, that the Proposed Scheme should be treated as development for which development consent under the PA2008 is required and is therefore a Project of National Significance (PNS). In the Annex to the Section 35 Direction, the SoS gave reasons why the Proposed Scheme should be considered as a PNS, including that: "The carbon capture element of the Proposed Project would provide and support the decarbonisation of energy from waste derived CO2 emissions in the UK, delivering over a million tonnes of CO2 savings per annum, and supporting the achievement of a fully de-carbonised district heating network that crosses local authority areas". In her letter of 28 February 2024, the SoS again refers to that reasoning and concludes that it continues to apply, confirming that the Carbon Capture Project remains a PNS.
The PEIR:	N/A
· Contains a more detailed scheme description than in the letters, see paragraph 1.1.5. It explains the intended links with the Riverside 1 and 2 facilities and the overall intended carbon dioxide capture.	Noted
· Paragraph 1.1.10 confirms that the Hydrogen Project element of the scheme (and in fact also a battery energy storage system) are no longer part of the Project. The decision not to proceed with those elements was "made on commercial grounds".	Chapter 1: Introduction (Volume 1) of the Environmental Statement confirms the decision to not proceed with the hydrogen element nor the battery energy storage system of the Proposed Scheme.
· Importantly, paragraph 1.2.1 details the direction made by the Secretary of State that the Project should be treated as an NSIP and should therefor follow the DCO process. There are two points on this:	Noted
i. First, the decision to make a Section 35 direction seems to have been taken when the Project had the additional Hydrogen Project element (see also paragraph 1.2.2); and	Noted
ii. Secondly, the authors of the PEIR and indeed the correspondence have treated the s.35 direction as making the project "an NSIP". See, e.g., 1.2.1 and the letter of 18th October 2023. This is contrary to case law, which establishes that such directions by the Secretary of State determine the process to be followed, but do not turn a project which is not an NSIP under the Planning Act 2008 into that kind of project. This matters, because the decision-making approach for different kinds of projects under the Act differs depending on whether or not the project is an NSIP. If it is, a decision is taken pursuant to Section 104 of the Planning Act 2008, unless specified exceptions apply. The decision must be taken "in accordance with" any relevant policy statement. In practice this leads to a constrained decision making process. By contrast, if the decision is taken pursuant to section 105 of the Planning Act (i.e. broadly, the project goes through the DCO process but is not an NSIP), the obligation is the "have regard" to any relevant national policy statement, plus a range of other considerations. This in practice can be very important. That is particularly where, as here, there are local policy designations which in the latter case (s.105) may well prove important and relevant issues (e.g. Metropolitan Open Land), but which would not have the same import if the decision is taken under s.104.	The PEIR correctly reflects the position in respect of section 104/section 105 of the Planning Act 2008 and projects brought into the regime at the time that it was written. Since it was written, the new National Policy Statements (NPS) have been published and were designated on 17 January 2024. The new NPS EN-1 makes clear that it and the relevant technology specific NPSs apply to section 35 projects. As such there is no doubt that section 104 will apply. Furthermore, the Proposed Scheme is considered a project of 'Critical National Priority' as defined by that NPS.
· On a related point, there is some acknowledgment of the relevant case law in paragraphs 1.5.1 and 1.5.2, but it assumes that there will be text in the applicable National Policy Statement (EN-1) which (when designated) would affect whether the development is assessed pursuant to section 104 or 105 of the Planning Act 2008. We would query whether ultimately that will be the case and, if such text is included, whether that would be the true legal effect. This is again significant. Its potential utility is ramping up potential litigation risk for the project promoter. As has been noted, these points in this context are in practice very important.	The PEIR correctly reflects the position in respect of section 104/section 105 of the Planning Act 2008 and projects brought into the regime at the time that it was written. Since it was written, the new National Policy Statements (NPS) have been published and were designated on 17 January 2024. The new NPS EN-1 makes clear that it and the relevant technology specific NPSs apply to section 35 projects. As such there is no doubt that section 104 will apply. Furthermore, the Proposed Scheme is considered a project of 'Critical National Priority' as defined by that NPS.
· In terms of the operational life of the plant (section 2.7), a design life of 25 years is given, but the PEIR assumes a "reasonable worst case scenario" of 50 years. After that, there may be some "residual life" remaining and an investment decision would be made.	Chapter 4 EIA Methodology (Volume 1) confirms that Proposed Scheme is intended to operate for at least 25 years. However, for the purpose of assessing a reasonable worst case scenario it is anticipated that it could have a design life of 50 years, as per typical design life of the civil and structural elements of the Proposed Scheme. At the end of the 50 year period, the Proposed Scheme may have some residual life remaining, and an investment decision will be made as to whether the operational life of the Proposed Scheme is to be extended. If it is not appropriate to continue operation, the plant will be decommissioned. Further information can be found in Chapter 2: Site and Proposed Scheme Description (Volume 1).
3. Assuming the availability of the DCO process, a decision on the Project should be taken under Section 105 of the Planning Act 2008, as matters stand, and notwithstanding the formulation of EN-1 as ultimately designated.	The PEIR correctly reflects the position in respect of section 104/section 105 of the Planning Act 2008 and projects brought into the regime at the time that it was written. Since it was written, the new National Policy Statements (NPS) have been published and were designated on 17 January 2024. The new NPS EN-1 makes clear that it and the relevant technology specific NPSs apply to section 35 projects. As such there is no doubt that section 104 will apply. Furthermore, the Proposed Scheme is considered a project of 'Critical National Priority' as defined by that NPS.
4. The land is constrained, including by its Metropolitan Open Land designation, but there are also a range of nature conservation interests to take into account in addition. These tend to militate against the proposed Project.	The Applicant's response to this comment can be found at section 5 of the Planning Statement (Document Reference 5.2).
5. Re ecological/ biological effects – it is not clear (but seems to be the case) that the proposal included development on land identified as an area for ecological mitigation for Riverside 2 (paragraph 7.6.10). this seems undesirable, because the Project that needs to address that impact.	The Applicant's response to this comment can be found in Table 7-3 of the Environmental Statement: Chapter 7: Terrestrial Biodiversity.
6. There is no compelling case in the public interest for the compulsory acquisition of the land (as required by Section 122(3) of the Planning Act 2008), not least because: There are alternative areas on which the development/ construction compounds/ ecological mitigation works could be delivered (and the proposals look to develop habitat created as part of the Riverside 2 scheme, which is undesirable);	"The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the chosen development zone. As stated in Chapter 3: Consideration of Alternatives (Volume 1), no viable options to the core Temporary Construction Compound, including offsite, have been identified. There is a lack of appropriate available land in the vicinity of the Site. The core Construction Compound is located on land that will in any event be utilised for the Carbon Capture Facility and much of this land is currently in use as construction laydown for R2. The western Temporary Construction Compound and Proposed Jetty Temporary Construction Compound are located, and sized, as appropriate for the activities they are supporting during the construction phase.All ecological impacts of the Proposed Scheme will be mitigated appropriately, and relevant proposals in this regard were set out in the statutory consultation brochure. This is addressed in Chapter 7: Terrestrial Biodiversity (Volume 1) and the Outline LaBARDS (Document Reference 7.9)."
i. It is not clear whether there has been proper disaggregation of the elements of the proposed development in considering alternatives; and	The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the chosen development zone. As stated in Chapter 3: Consideration of Alternatives (Volume 1), no viable options to the core Temporary Construction Compound, including offsite, have been identified. There is a lack of appropriate available land in the vicinity of the Site. The core Construction Compound is located on land that will in any event be utilised for the Carbon Capture Facility and much of this land is currently in use as construction laydown for R2. The western Temporary Construction Compound and Proposed Jetty Temporary Construction Compound are located, and sized, as appropriate for the activities they are supporting during the construction phase.All ecological impacts of the Proposed Scheme will be mitigated appropriately, and relevant proposals in this regard were set out in the statutory consultation brochure. This is addressed in Chapter 7: Terrestrial Biodiversity (Volume 1) and the Outline LaBARDS (Document Reference 7.9).

	ii. As matters stand, there is no proper justification for permanent rather than temporary acquisition, particularly given the availability of alternative layouts/ disaggregation of the proposals.	
	7. If the Property is proven to be required by the Project it should only be by way of a Lease for a defined temporary period on agreed terms rather than by the acquisition of the freehold, although no admission or agreement is made by Creek regarding this in any way at this stage.	Cory is and remains willing to discuss the nature of any land agreement between Cory and Creekside Develeopments. However, Cory'ss initial view is that the Proposed Scheme has a planned design life of at least 25 years (excluding a circa 5 year construction period), and this has the potential to increase with the implementation of an effective maintenance strategy for the Proposed Scheme's equipment and assets. Further, the Proposed Scheme will be co-located and contiguous with the Riverside 1 and Riverside 2 facilities, both of which have permanent operational consents (and therefore have continuous carbon capture needs) with no decommissioning requirements, so taking the land on a lease is not considered a workable solution in the event the Proposed Scheme outlives its design life.
	8. From information our surveyors hold from the Climate Council website it appears that a number of decarbonisation projects elsewhere have failed and the technology seems to be unreliable.	Post-combustion carbon capture is a commercially proven technology. There are multiple plants in commercial operation worldwide, the largest having a capacity of 1.5 million tonnes per year of CO2 captured, and these have an excellent safety record. The technology is available from several highly experienced technology providers who are prepared to guarantee the performance of their technology.
	9. On a general note, it would be appreciated if Cory would deal with the matter in future with more openness and transparency, as full information does not appear to have been disclosed as early as it might have been, particularly in light of the existing relationship between Cory and Creek.	Cory values its long standing relationship with Creekside Developments Ltd and has always and has always conducted engagement in an open, honest and timely manner. It is committed to continuing in this approach as the Proposed Scheme develops.
Dartford Borough Council	The Borough Council would wish to raise concerns on the proposal. Dartford Borough Council (DBC) has considered the submitted documents and the PEIR. DBC are supportive of the scheme but have significant concerns with regard to the traffic and air quality impacts and how these are proposed to be assessed and mitigated as set out in the PEIR.	Estimated construction traffic flows are set out in ES Chapter 18: Landside Transport (Volume 1). Based on the predicted flows a quantitative assessment using ADMS Roads (version 5.0) has been undertaken to assess the impact of construction traffic on the local road network. Concentrations are reported at sensitive receptors along the modelled road network which extends from the Site to Junction 1A of the M25. The modelled road network is displayed in Figure 5-1: Construction Emissions Assessment Study Area (Volume 2).
	The scheme will generate significant levels of traffic during construction with the scheme also having a long construction phase. The submitted details suggest that a majority of the construction traffic, in particular HGV's will travel to/from the A282/M25 using Bronze Age Way and Thames Road (within Bexley) and Bob Dunn Way within Dartford. This route already suffers from significant traffic levels and regular congestion. The known traffic 'hot spots' being Craymill Bridge, the western end of Bob Dunn Way and the eastern end of Bob Dunn Way and junction 1a of the M25/A282. The Environmental Impact Assessment (EIA) and Transport Assessment should fully assess the impacts of construction traffic on this route.	Estimated construction traffic flows are set out in ES Chapter 18: Landside Transport (Volume 1). Based on the predicted flows a quantitative assessment using ADMS Roads (version 5.0) has been undertaken to assess the impact of construction traffic on the local road network. Concentrations are reported at sensitive receptors along the modelled road network which extends from the Site to Junction 1A of the M25. The modelled road network is displayed in Figure 5-1: Construction Emissions Assessment Study Area (Volume 2). The number of trips anticipated to be attracted by the construction of the Proposed Scheme has been estimated based upon an assessment of similar sized schemes and taking into consideration localised factors (for example, HGV loading areas within the Temporary Construction Compounds and typical HGV loading/unloading times). As such, the estimates are considerably lower than that which was presented within the PEIR16 Chapter 18 of the Environmental Statement and Appendix 18-1: Transport Assessment (Volume 3) provide a robust assessment of the effects of construction traffic on the surrounding transport networks. The highway links within the Study Area that have been assessed include, but are not limited to, A2016 Bronze Age Way, A206 Thames Road and A206 Bob Dunn Way. A Framework CTMP (Document Reference 7.7) has been prepared which sets out potential measures (including delivery schedules, designated routes and Site signage) to mitigate construction effects. A full CTMP(s) will be developed post-determination in substational accordance with the Framework CTMP (Document Reference 7.7), pursuant to a requirement in the Draft DCO (Document Reference 3.1).
	The applicant should also ensure that National Highways are consulted on these proposals.	Noted
	Linked to the above, are issues related to air quality. DBC have no objection to the proposed scoping out of operational traffic. However, impacts from the construction phase on air quality as well as operational impacts from the facility itself should be fully considered in the EIA.	Estimated construction traffic flows are set out in Chapter 18: Landside Transport (Volume 1) and are considerably lower than that which was presented within the PEIR. The predicted construction traffic flows were compared to stringent IAQM/EPUK21 criteria and based on the predicted flows a quantitative assessment using ADMS Roads (version 5.0) has been undertaken to assess the impact of construction traffic on the local road network, accounting for the presence of AQMA. The results of the assessment are presented in Section 5.8

	The PEIR advises that, "...if the predicted numbers of construction or operational traffic movements generated by the Proposed Scheme alone or cumulatively would demonstrably not exceed the relevant indicative criteria for air quality assessment set out in the IAQM guidance, as relevant to each of the affected roads used for construction or operational traffic (once the route has been confirmed), the Inspectorate agrees that this matter can be scoped out of the ES." However DBC do not accept this approach. "Where predicted construction or operational traffic flows meet the criteria, the Scoping Report confirms that this matter will be scoped into the ES." The above approach is not accepted. The scheme will generate significant traffic levels, contributing to increased congestion and queuing of vehicles which has significant potential to reduce air quality. Air quality in and around Dartford is primarily impacted by congestion and vehicles queuing. Impacts on air quality in existing AQMA's should be considered regardless of the quoted criteria. The Council notes that this is 'indicative' criteria. Whilst exact details are to be agreed, it is highly likely that a route through Dartford to/from the M25/A282 will be used by construction traffic. This would take the majority of construction traffic and a large amount of construction staff vehicles through an existing AQMA. The EIA should not therefore ignore this issue and should consider the impacts on Dartford. This is particularly important given existing traffic levels and regular congestion in this area. Additionally, the Borough suffers from significant impacts from incidences at Dartford Crossing. The severity and the frequency of incidences at Dartford Crossing creates significant queuing and standing traffic on the local road network as well as the strategic highways and this impacts air quality in the local area. Without assessment of impacts of air quality on this area, the extent of the impact and importantly any necessary mitigation will not be known and secured.	Estimated construction traffic flows are set out in Chapter 18: Landside Transport (Volume 1) and are considerably lower than that which was presented within the PEIR. The predicted construction traffic flows were compared to stringent IAQM/EPUK21 criteria and based on the predicted flows a quantitative assessment using ADMS Roads (version 5.0) has been undertaken to assess the impact of construction traffic on the local road network, accounting for the presence of AQMA.The results of the assessment are presented in Section 5.8
	The scheme is aimed at reducing CO2 emissions and this is of course welcomed but the impacts of achieving this CO2 reduction should be fully considered and this should include all construction impacts including air quality impacts arising as a result of construction traffic.	The predicted construction traffic flows were compared to stringent IAQM/EPUK21 criteria and based on the predicted flows a quantitative assessment using ADMS Roads (version 5.0) has been undertaken to assess the impact of construction traffic on the local road network.The results of the assessment are presented in Section 5.8 The assessment presented within chapter 13: Greenhouse Gases has calculated the GHG emissions associated with the transport of materials to the Site during the construction phase, results are presented in Table 13 8. Impacts to air quality during the construction phase have been considered in Chapter 5: Air Quality (Volume 1).
	From the above and in relation to both issues (which are clearly linked), the applicant is intending to construct a jetty. The provision of this should be brought forward in the construction programme such that it is available and used for the construction phase of the development as well as the operational phase.	A breakdown of the indicative construction programme can be found in Chapter 2: Site and Proposed Scheme Description (Volume 1). Optionality remains over whether Option 1 (60 months) or Option 2 (42 months) will be selected for construction to allow for flexibility post-DCO application submission. This means the construction of the Proposed Jetty will begin either in Q3 2026 for Option 1 or Q1 in 2027. It is not practicable to bring the construction of the Proposed Jetty forward because waiting for the Proposed Jetty to be available would delay the programme of construction by 18 months and result in CO2 emissions continuing for an additional period of time before the Carbon Capture Plant becomes available. The Proposed Jetty would not have the required capacity to accommodate the construction of the Proposed Scheme. In addition, its lightweight structure is less suited for bringing in construction materials. Utilising landside transport for the construction of the Proposed Scheme will not result in significant effects on the local road network, as set out in Chapter 18: Landside Transport (Volume 1)
	As this is within a London Borough, the report refers to the GLA's Air Quality Neutral Assessment (AQNA) requirement and also the Air Quality Positive Statement. (AQPS). For both of these the PINS response on the scoping was, "The Scoping Report explains that Policy S1 1 of the London Plan ('Improving Air Quality') states that "development proposals must be at least air quality neutral" and that the Greater London Authority sets out requirements for developments to demonstrate measures taken to achieve the best possible outcomes for air quality, known as Air Quality Positive. An AQNA and AQPS are proposed for the operational phase, but not for construction. The Scoping Report does not provide evidence that these requirements relate to operation only or provide justification for why such a consideration is not required and therefore, the Inspectorate is not in a position to scope out the need for an AQNA and AQPS relating to the construction phase." DBC agree that both the AQNA and AQPS will be important assessments. DBC also agree with the response from PINS which raises concerns that whilst these are proposed for the operational phase, these should also be provided for the construction phase. This links to DBC's point above regarding the consideration of air quality impacts.	The current methodology for assessing compliance with Air Quality Neutral guidance31 is based on a series of benchmarks for emissions of NOX and PM10 from buildings (e.g. energy provision) and transport. There are no applicable benchmarks for an industrial development such as the Proposed Scheme, neither for the specific development type nor that could be used as a proxy for the development type. Therefore, an Air Quality Neutral Assessment is not applicable nor indeed possible. Notwithstanding this, the principal source of emissions from the Proposed Scheme are combustion gases from the incineration of waste. The Proposed Scheme will not change the emissions of NOX and PM10 from Riverside 1 and Riverside 2 and is therefore inherently Air Quality Neutral. An Air Quality Positive Statement for the operation of the Proposed Scheme has been produced and is presented in Appendix 5-4: Air Quality Positive Statement (Volume 3). Air quality impacts during construction are minimised through the actions set out in the Outline CoCP (Document Reference 7.4). Appendix 5-4: Air Quality Positive Statement (Volume 3) relates to the Proposed Scheme design, focussing on the operation phase.
	It is also important that these assessments include cross-boundary impacts, both in relation to the operational phase of development and also the construction phase.	The air quality assessment considers impacts across the Study Areas defined in Section 5.5. This covers multiple local authorities. Outside of the Study Area air quality impacts will be negligible.
	To conclude, the scheme is aimed at reducing CO2 emissions and this is welcomed but the impacts of achieving this CO2 reduction should be fully considered and this must include all construction impacts including air quality from construction traffic. Without this, the net benefits of the scheme are unknown.	The assessment presented within this chapter has calculated the GHG emissions associated with the transport of materials to the Site during the construction phase, results are presented in Table 13 8. Impacts to air quality during the construction phase have been considered in Chapter 5: Air Quality (Volume 1).
	KCC Highways were consulted on this proposal by DBC and they have commented as below.	Noted
	"Kent County Council, in its capacity of the local highway authority for the administrative area of Dartford Borough Council, was not consulted on the Preliminary Environmental Information Report (PEIR) which was submitted to the Planning Inspectorate on 16th October 2023. (They were however consulted by DBC). KCC Highways did provide comments to the applicant regarding the scope of the traffic surveys, which were subsequently undertaken in June and July 2023.	No response required.

	"The part of the local road network within Dartford that would be impacted by the proposals is heavily congested. This is the route along the A206 towards M25 Junction 1A and B, via the Cray Mill Bridge pinch point. Will the proposed jetty be delivered during the early phases of the construction period, so that it may be used to transport construction materials for the remainder of the scheme, thereby minimising the impact on the local road network? "With regards to the scope of the Transport Assessment set out in a Memo from WSP dated 20th October 2023, I would make the following comments:- · Chapter 3 should also review the Kent County Council 'Emerging Local Transport Plan' dated June 2023; · It is noted that further details on the trip attraction and assignment are provided in the PEIR, including on the census data used to derive the mode split. The approach is acceptable in principle. However, it is recommended that the assignment of traffic is reviewed, given the passage of time since Riverside 2 was assessed and the changes in travel patterns which have occurred in the interim; and Traffic data from the June / July 2023 surveys should be provided to confirm that the proposed assessment of traffic impact does not need to be extended further."	Table 2-3 and Table 2-4 of Chapter 2: Site and Proposed Scheme Description (Volume 1) indicate the preliminary construction programme for the Proposed Scheme. As explained in Section 2.4 of Chapter 2: Site and Proposed Scheme Description (Volume 1) for the landside elements of the Proposed Scheme construction transport will primarily be road-based. It is not practicable to use Middleton Jetty for the delivery of construction plant and materials for the landside elements of the Proposed Scheme without compromising the effectiveness of the operations at Riverside 1 and Riverside 2 (once operational). Construction transport for the Proposed Jetty (i.e. steel piles, precast concrete units and marine equipment such as fenders) is anticipated to be primarily via the River Thames. The Proposed Jetty would not have the required capacity to accommodate the construction of the Proposed Scheme. In addition, its lightweight structure is less suited for bringing in construction materials. To utilise landside transport for the construction of the Proposed Scheme will not result in significant effects on the local road network, as set out in this chapter. In order to assess a worst case scenario it has been assumed that all construction transport will be road-based. Chapter 18 of the Environmental Statement and Appendix 18-1: Transport Assessment (Volume 3) provide a robust assessment of the effects of construction traffic on the surrounding transport networks, based on traffic data collected in June 2023. The highway links within the Study Area that have been assessed include, but are not limited to, A2016 Bronze Age Way, A206 Thames Road and A206 Bob Dunn Way. Section 18.2 of this chapter and Section 3 of Appendix 18-1: Transport Assessment (Volume 3) also present a summary of the relevant policies to this assessment, including the Kent Emerging Local Transport Plan 5: Turning the Curve Towards Net Zero 20239. The methodology used to distribute and assign the construction workforce trips for this assessment replicates that which was used within the Riverside 2 Transport Assesssment19 which was developed with input and approval from the local highways authorities. Despite the changes brought about by the COVID-19 pandemic, such as increased remote working, this is unlikely to have affected the trip distribution and assignment of the construction industry given the nature of the anticipated works. The traffic data is appended to Appendix 18-1: Transport Assessment (Volume 3).
Environment Agency	Following review of this information we wish to provide comments on the following subjects: 1. Cory Consultation Questions 2. Flood risk 3. Potential contamination and groundwater protection 4. Biodiversity 5. Water Framework Direct 6. Wastewater treatment	Noted
	We are supportive of achieving net zero and of achieving that for Riverside.	No response required.
	We will support plans which deliver environmental and flood risk improvements and are supported with detailed surveys to decide required mitigation and compensation measures.	Consultation with the Environment Agency has been undertaken to support this chapter and associated appendices. Consultation has comprised discussion regarding assessment methodologies and assessment results and mitigation measures which have been incorporated into the Proposed Scheme design (embedded mitigation). The embedded mitigation of relevance to this comment is presented in Section 11.7 of the Environmental Statement).
	Flood risk is to be considered under the design principal theme of 'Climate'. We propose that that theme is expanded to reflect that existing Flood Risk must not be increased as well as not making flood risk worse with climate change. Perhaps the first themes could be - 'Environment, Water and Climate'.	The project principles (see Design Approach Document, Document Reference 5.6) have been structured to align with guidance prepared by the National Infrastructure Commission under the headings people, place, value, climate. Flooding is covered under Climate. Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to support Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and a+G101fter the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations. There is no significant increase in flood risk as a result of the proposed scheme. There is a slight increase in flood depth outside of the scheme boundary, although the FRA concluded this did not lead to a significant increase in flood risk.
	We would support design which minimises the built footprint thereby reducing the need for land raising and removal or overshadowing of watercourses. If there is the potential for this to be done via a mixture of design type then we would support this approach. If a reduction in the number and size of the CO2 storage tanks can be achieved by having receiving ships on the jetty for a greater proportion of the time thereby reducing the need for gas storage then we would also encourage this.	The design of the Proposed Scheme has been undertaken in such a manner to reduce the built footprint, as detailed in Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1). The potential effects of overshadowing of watercourses are addressed in Chapter 7 of the Environmental Statement: Terrestrial Biodiversity (Volume 1). Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to support Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and after the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations. Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the assessment of fluvial and pluvial flood risk associated with the Proposed Scheme using the Environment Agency's Marsh Dykes model (updated to reflect the Proposed Scheme). The modelled flood depths are significantly below the flood level for a breach of the River Thames defences, thus as a result of the embedded mitigation in place to prevent the Proposed Scheme from flooding during a breach of the River Thames Flood Defences, the Proposed Scheme will not be at risk of flooding from the Marsh Dykes

Some increase in residual breach flood risk is expected, caused by the reduction in the area and volume of the floodplain during a breach in the Thames tidal flood defences. Furthermore, more information should be provided to assess the potential for the ground level raising to increase surface water and fluvial flood risk due to the area of ground raising just south of Riverside 1.	
Inclusion of the Thame Water land (East Paddock) within the proposed ground raising is seemingly within the Crossness nature reserve boundary.	As described in Chapter 2: Site and Proposed Scheme Description (Volume 1) and Chapter 3: Consideration of Alternatives (Volume 1) the East Paddock is required for the Carbon Capture Plant(s). The Terrestrial Site Alternatives Report (Document Reference 7.5) describes the site assessment process undertaken to select the location for the whole Carbon Capture Facility.
This could lead to a significant net loss in terms of Biodviersity Net Gain (BNG) and would not be supported unless it can be fully mitigated and/or compensated for. We would not support the loss of habitat especially in regard to the ditch network which could contain/support watervoles unless it can be fully mitigated and/or compensated for.	The Proposed Scheme aims to achieve a 10% net gain in biodiversity as measured through the UK Governments Statutory Metric. This is presented as Appendix 7-1: Biodiversity Net Gain Report (Volume 3). Further information about the proposed habitat creation and enhancement is provided in the Outline LaBARDS(Document Reference 7.9).
Our preferred option would be the removal of the jetty structure in the intertidal area to allow for the restoration of BAP priority intertidal habitat. Which would greatly contribute to BNG as it restores a more natural river corridor in line with "making space for water" and Estuary Edges guidance and Thames Estuary 2100 plan (TE2100) plan.	It is still the case that the Belvedere Power Station Jetty (disused) may be retained or demolished as part of the Proposed Scheme, further detail is provided in Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1). Chapter 8: Marine Biodiversity considers the impacts of both scenarios.
Home – Estuary Edges	Noted
The existing jetty structure has been noted as a viable high tide roost and fish refuge. If the applicant can demonstrate why the Jetty cannot be removed, then significant enhancement to this structure to provide BNG and improved ecological niche habitat should be provided.	Should the Belvedere Power Station Jetty (disused) (with modifications) be retained, enhancement measures are likely to be provided, further detail is provided in Section 8.9 of Chapter 8 of the Environmental Statement: Marine Biodiversity.
If Belvedere Power Station Jetty is to be retained proposals for how the flood defence structures will be maintained where the jetty meets the land should be included.	Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the impacts to Environment Agency managed Flood Defences and main rivers and the effects associated with the demolition or retention (with modifications) of the Belvedere Power Station Jetty (disused). Appendix 11-2: Flood Risk Assessment (Volume 3) also details the maintenance of the River Thames Flood Defences if the Belvedere Power Station Jetty (disused) is retained.
More information on the spatial separation between the flood defences and the proposed new jetty should be provided. Proposals for undertaking flood defence crest raising in line with predicted climate change induced sea level rise should be provided.	Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the parameters for the Access Trestle where it crosses the River Thames Flood Defences. These demonstrate that the construction and operation of the Access Trestle will not prevent the River Thames Flood Defences beneath/in close proximity to the Access Trestle from being raised to the level required in the Thames Estuary 2100 Plan.
The new Jetty should be enhanced with fish refuge structures and inclusion of timber fender to provided improved ecological substrate.	Chapter 8 of the Environmental Statement: Marine Biodiversity (Volume 1) stated that the Proposed Jetty will include enhancements including artificial fish refuge habitat.
If land raising is to occur in the (East Paddock) which is going to be of determent to water voles. The applicant should seek to avoid any habitat degradation. If this cannot be avoided the applicant should demonstrate reasons why this is the case and the measures set out in 7.9. ADDITIONAL DESIGN, MITIGATION AND ENHANCEMENT MEASURES should be discussed and agreed with more detailed information provided.	Water vole mitigation will be carried out where ditches will be affected. This will comprise a programme of capture and captive breeding, removing water voles from affected areas, then habitat reinstatement and creation, followed by their release. These measures are outlined in in Section 7.9 of Chapter 7 of the Environmental Statement, and the Applicant is currently seeking to obtain a Letter of No Impediment in respect of this.
We support a well designed and accessible riverside environment.	Noted
2: Flood risk	Noted
The potential for works close to Great Breach pumping station to hinder proposals for the improvement of that pumping station requires further information and assessment.	Chapter 11: Water Environment & Flood Risk (Volume 1) notes that the Applicant remains in discussions with the Environment Agency to understand its aspirations for the upgrade works for Great Breach Pumping Station, noting that the Environment Agency has only just started this aspect of works and are at the options appraisal stage at the time of submitting this assessment. The construction programme for the Proposed Scheme as shown in Chapter 2: Site and Proposed Scheme Description (Volume 1) can be suitably phased to avoid overlaps with the Environment Agency's current programme that construction will occur prior to 2036.

Before and after breach flood risk modelling should be undertaken. However, appears self-evident that the raising of about 7.4 hectares of land to the south of the power station will increase residual flood risk to some extent to existing homes, businesses and infrastructure. Options to prevent that impact could include:	Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to support Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and after the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations.
· Lowering ground levels elsewhere as floodplain compensation, although it is unclear if doner high ground exists where it would be needed. · Pumping to discharge flood water to the Thames to reduce residual risk flooding. · Improvements to the flood defences, although that is difficult including due to much of the run of the defences being outside the current proposed site extent. · Minimising the extent of the land raising that will take place in combination · with the above. Including an evaluation of whether all of the infrastructure need to be remain dry in the event of a breach of the Thames Tidal Flood defences.	
Other flood risk issues	Noted
Proximity to Main Rivers including the dyke up Norman Road.	Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the impacts to Environment Agency managed Flood Defences and main rivers.
We would welcome the inclusion of works to remove the redundant Borax Jetty which is expensive to maintain and has safety issues with gaining access for inspection and needed ongoing remedial works.	This ES uses terminology 'Belvedere Power Station Jetty (disused)' rather than Borax Jetty. Section 2.5 of Chapter 2: Site and Proposed Scheme Description (Volume 1) discusses the options for retention/removal of the Belvedere Power Station Jetty (disused). The Applicant will make a decision regarding this at the detailed design stage.
CHAPTER 1: WATER ENVIRONMENT AND FLOOD RISK	N/A
Page 11-25	N/A
Flood Risk and Coastal Processes	N/A
We welcome residual flood risk being scoped in particularly due to the large area of ground raising that may divert and displace floodwater in the unlikely but high consequence event of a breach of Thames Tidal flood defences.	Noted
The proximity of development to the main rivers should be scoped in.	Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) provides an assessment of the Proposed Scheme in relation to the proximity to the main rivers and assesses the residual flood risks.
Flood Risk 10.8.14 and 10.9 – We accept the 2018 breach modelling for new development until revised breach flood modelling becomes available based on the new in-channel peak flood modelling.	Chapter 11: Water Environment & Flood Risk (Volume 1) states that the Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to support Appendix 11-2: Flood Risk Assessment (Volume 3). The Environment Agency's revised breach modelling was not available at the time of writing this assessment as it has not been released for external use. Therefore it has not been used to inform the assessment of the Proposed Scheme.
Table 11-2	Noted
The Marsh Dykes flood model has since been provided by the Environment Agency.	Noted
19th September 2023, Meeting	Noted
'The Environment Agency confirmed that they have no concerns regarding sedimentation of the Great Breach Outfall, vessel wash, intertidal habitats, and impacts on the River Thames flood defences. The Environment Agency also confirmed that sediment modelling would be required.'	Noted
We welcome the commitment to carry out sediment modelling to assess the new structure.	Noted
Table 11-6: Water Environmental and Flood Risk Magnitude Criteria states that magnitude Major Adverse includes a Loss of flood storage areas, Increase in peak flood level (1 in 100 year event) > 100 mm)*. and that Moderate Adverse includes increase in peak flood level (1 in 100 year event) > 50 mm*. Based on this the development we believe the impact should be considered Major Adverse given that the proposed land raising could lead to a loss of flood storage in the event of a breach thereby increasing risk to existing receptors. We disagree with the inclusion of modelling tolerance values. Depending on the receptor the Environment Agency will oppose modelled increases in offsite flood levels. To avoid this, the applicant should mitigate for any changes to flood risk offsite through the design of the development. This minimises the risk of increasing flood risk off site, including from the cumulative effect of multiple developments over time.	The water environmental and flood risk magnitude criteria, presented within Table 11-5 of the Environmental Statement, has been updated to reflect the most up to date wording as presented in the Design Manual for Roads and Bridges (DMRB) LA 113 – Road Drainage and the Water Environment62 that provides the basis of which the assessment has been undertaken. This has removed reference to 'Loss of flood storage areas' and instead references changes to peak flood level that would affect identified receptors (noting that this impact may be a result of the loss of flood storage areas). However, loss of flood storage areas has still been taken into account in the assessment of flood risk and to meet the requirements of PPG26. The Applicant's understanding of flood storage areas in this context is informed by information provided on the Flood Map for Planning that describes flood storage areas as those that "act as a balancing reservoir, storage basin or balancing pond. Their purpose is to attenuate an incoming flood peak to a flow level that can be accepted by the downstream channel. It may also delay the timing of a flood peak so that its volume is discharged over a longer time interval". The Applicant has also considered the reference to flood storage areas as provided in the PPG26 (Paragraph 049), that states "The loss of floodplain storage is less likely to be a concern in areas benefitting from appropriate flood risk management infrastructure or where the source of flood risk is solely tidal." Given the tidal dominance of flooding, protection offered by flood defences and reliance of pumped drainage systems in the Study Area, the Applicant proposes that thereference to flood storage areas as recommended by the Environment Agency would not be appropriate to this Site in this instance. The Applicant has however assessed flood risk to the Site that could be attributable to fluvial sources of flooding and provided recommendation as to how the loss of these relatively minor areas could be mitigated within the Proposed Scheme. Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to support Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and after the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations. Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the embedded and additional mitigation as part of the Proposed Scheme and discusses the results of the modelling undertaken to demonstrate that the Proposed Scheme does not increase flood risk.

A comparison of baseline and post-development modelling results should be made and used the evidence base to demonstrate there is no detriment from the development proposals. This should be used to carry out this analysis using raw results, without including any buffer for 'modelling tolerance' (model calculation error). The priority should be to mitigate any changes to flood risk in the design of the development. A robust technical analysis should be provided and reporting to support any change in flood risk which is identified as part of the model calculation error.	Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to support Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and after the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations.
Table 11-15 and also Table 11-16 and 11-16	Noted
We disagree with the assessment of the risk associated with a breach of the Thames Tidal defences as being Slightly Adverse (Not Significant). As above based in our opinion the impact should be considered Major Adverse given that the proposed land raising could lead to a loss of flood storage in the event of a breach thereby increasing risk to existing receptors.	The Applicant does not consider the floodplain in the vicinity of the Proposed Scheme that is associated with a breach in the River Thames Flood Defences to be a typical 'flood storage area'. The Applicant has instead assessed the magnitude of impact based on any predicted increase or decrease in flood depth within the Study Area. Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to supportAppendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and after the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations. Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the embedded and additional mitigation as part of the Proposed Scheme and discusses the results of the modelling undertaken to demonstrate that the Proposed Scheme does not increase flood risk.
The impact of 7.4 hectares of ground raising to lift the development platform above the breach floodplain level should be modelled and compensated for. Otherwise, the flood risk to people could increase.	The Applicant has considered guidance provided in the PPG26 (Paragraph 049), that states in regard to the provision of compensatory flood storage that "The loss of floodplain storage is less likely to be a concern in areas benefitting from appropriate flood risk management infrastructure or where the source of flood risk is solely tidal', and 'Where development proposals would result in the deflection or constriction of identified flood flow routes, a site-specific flood risk assessment will need to demonstrate that such routes will be safely managed within the site. The impact of development on flood flow routes may also be an important consideration for sites which benefit from the presence of flood risk management infrastructure and where flow routes are likely to affect the site in the event of a failure or exceedance of such infrastructure". The Applicant has therefore adopted the approach to assess the impact of the Proposed Scheme (including ground raising) on flood risk elsewhere informed by site-specific hydraulic modelling, and recommend appropriate management and mitigation to address any predicted increase in risk. Baseline and post development breach modelling has been undertaken to understand the implications on residual flood risk to existing homes, businesses and infrastructure taking into account the Proposed Scheme and the land raising included. The Environment Agency's Thames Estuary Breach Assessment (2018) reports and outputs were used in the breach assessment undertaken to supportAppendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3). The Environment Agency's Marsh Dykes model has been updated to incorporate the Proposed Scheme and assess the residual risk of breach. Additionally, a 2D hydrodynamic model has also been developed using the MIKE by DHI Flexible Mesh modelling software and provides further information on the flood depth, extent, and hazard under current baseline conditions and after the Proposed Scheme is constructed in the event of a flood defence breach assuming failure of the local pumping stations.
The raising of ground levels between Norman Road and Great Breach pumping station could also displace flood water increasing flood risk. More assessment of that risk is required. Until this is quantified we consider that risk to be higher than Slight Adverse (not significant).	Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the assessment of fluvial and pluvial flood risk in this area associated with the Proposed Scheme using the Environment Agency's Marsh Dykes model (updated to reflect the Proposed Scheme).
The extent of possible losses to watercourse channels could change. That could make the impacts more significant.	Appendix 11-2 of the Environmental Statement: Flood Risk Assessment (Volume 3) details the assessment of fluvial and pluvial flood risk associated with the Proposed Scheme (including losses to watercourse channels) using the Environment Agency's Marsh Dykes model (updated to reflect the Proposed Scheme).
Ground raising has the potential to cause rotational slip failures within the weak marsh ground. Where ground raising is proposed close to watercourses the risk of the channels being infilled or partly infilled by such soils failures should be designed out, preferably by providing a suitable offset of 8 metres or more if required for ground stability.	Appendix 11-2: Flood Risk Assessment (Volume 3) details the maintenance strips and mitigation measures in place to prevent the risk of channels being infilled as a result of local ground raising.
12. Climate Resilience	Noted
Raising the flood defence for climate change induced sea level rise in line with Thames Estuary 2100 plan should be proposed.	The conclusions of Appendix 11-2: Flood Risk Assessment (Volume 3) do not indicate that this is required as part of, or in consequence of, the Proposed Scheme. The Proposed Scheme has been designed such that any future flood defence raising pursuant to the TE2100 Plan would be able to be achieved. Appendix 11-2: Flood Risk Assessment (Volume 3) details the parameters for the Access Trestle where is crosses the River Thames Flood Defences.
CHAPTER 22: SUMMARY OF EFFECTS	N/A
The same issues referred to in Table 11-15 apply to Table 22-1: Summary of Likely Environment Effects	Noted
This review has mainly been based on reviewing the document Preliminary Environmental Information Report (Cory ref 0.2, PINS ref EN010128). The development for which the DCO will be sought includes: a) Construction and use of a Carbon Capture Facility. b) Construction and use of a new Jetty Facility. c) Construction and use of pipework connecting the two Facilities. d) Environmental mitigation area. e) Changes to local road layouts. f) Temporary construction compounds	Noted

	We note that hydrogen and battery storage proposals, mentioned in the previous consultation response from SL/2023/122661/01, are no longer proposed, and comments from our previous response have been acknowledged. The scope of the proposed EIA is acceptable in principle in that it outlines key issues of concern including water quality and land contamination. We welcome the proposed inclusion of a piling risk assessment, and that sediment plume modelling will be undertaken. We note the consideration of the WFD assessments for the local groundwater body. Piling risk assessments should refer to the guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention" (NGWCL Centre Project NC/99/73).	The Outline CoCP (Document Reference 7.4) states that a Piling Risk Assessment will be produced prior to construction commencing. The Piling Risk Assessment would include measures to protect the underlying aquifers during the construction phase and mitigate risk of creating preferential pathways for potential contamination. The Piling Risk Assessment would be drafted in accordance with the Environment Agency document titled Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (NGWCL Centre Project NC/99/73)23. Please refer to Chapter 11 of the Environmental Statement: Water Environment and Flood Risk (Volume 1) and Appendix 11-4: Coastal Modelling Studies (Volume 3) for details of the sediment modelling undertaken to inform this ES. A WFD assessment has been undertaken for the Proposed Scheme and is presented in Appendix 11-2: Water Framework Directive Impact Assessment (Volume 3).
	It is assumed that wastes will either be treated on-site and disposed of to foul sewer (under consent) or taken for treatment/disposal at an appropriately licensed facility off-site. Note that any discharge to the environment would be subject to environmental permitting regulations.	As detailed in Chapter 2 of the Environmental Statement: Site and Proposed Scheme Description (Volume 1) a new connection to the local foul sewer network will be required for wastewater discharge. The nearest foul sewer is located at the junction between Norman Road and A2016 Picardy Manorway.
	We welcome a BNG assessment undertaken by the applicant and would hope that a minimum of 10% net gain is achieved in every habitat type with ideally an aspiration of 20% and above to be realised. At present given the loss of habitat East Paddock the submission will need to demonstrate significant biodiversity net gain. We expect biodiversity net gain to be written into law January 2024.	The Proposed Scheme aims to achieve a 10% net gain in biodiversity as measured through the UK Governments Statutory Metric. This is presented as Appendix 7-1: Biodiversity Net Gain Report (Volume 3) of the Environmental Statement. Further information about the proposed habitat creation and enhancement is provided in the Outline LaBARDS (Document Reference 7.9).
	The Marine Team has reviewed the application and supporting documents in consideration of the WFD water quality elements for which we provide comment.	Noted
	The PEIR has addressed our scoping opinion comments on marine water quality, although please note that our suggestion (Ref Section 2.2.41) related to the of venting oxygen into the Thames estuary (also referred to as the Thames tideway), not into the Tideway Tunnel.	Chapter 8 of the Environmental Statement: Marine Biodiversity (Volume 1) assess the impacts in relation to marine water quality. Consultation with the Environment Agency has been undertaken to support this chapter and the associated appendices as described in Table 11-2 of Chater 11: Water Environment and Flood Risk (Volume 1). Chapter 2: Site and Proposed Scheme Description (Volume 1) provides a description of the types of wastewater and how wastewater will be generated and treated as part of the Proposed Scheme. It is not practicable to vent the oxygen via a diffuser into the Thames Tideway Tunnel which is located approximately 5km north west of the Site Boundary. Appendix 11-4: Coastal Modelling Studies (Volume 3) details the sediment modelling undertaken of the construction and operation dredging for the Proposed Scheme. The WFD Assessment presented in Appendix 11-1: Water Framework Directive Assessment (Volume 3), has been prepared to address the Environment Agency's comments in regard to water quality.
	We await the ES in due course, for full details of the proposals and their assessment. We expect the ES to contain full details and assessment of the proposed dredging (capital and maintenance) and piling works, following the completion of further work to include sediment analysis and sediment modelling. We note that relevant project design, mitigation and enhancement measures will be identified in the ES, including an Outline Code of Construction Practice (CoCP). Details of the sediment disposal proposals will also be contained in the ES.	The proposed dredging to be undertaken as part of the Proposed Scheme is described in Chapter 2 of the Environmental Statement: Site and Proposed Scheme Description (Volume 1). An assessment of the impacts of capital and maintenance dredging is presented in Section 8.8 (Chapter 8) of the Environmental Statement: Marine Biodiversity and assumes the backhoe dredging technique will be used for both capital dredging and maintenance dredging. The dredged arisings associated with the Proposed Scheme (during both capital dredging and maintenance dredging) will be managed in accordance with relevant legislation and will be disposed of offsite (via vessel and only if dredged arisings are deemed suitable for this disposal method and conform with the permits for disposal sites). The removal of the dredged arisings will be undertaken by an appropriately licenced waste carrier. Further information about onward sediment sampling is described in Section 8.9 and Section 8.10 of Chapter 8 of the Environmental Statement.
	We are pleased that the ES will contain a full stand-alone WFD Assessment of the proposed scheme (including the detailed Jetty works) as a technical appendix to Chapter 11. We would like to reiterate our advice in relation to the WFD assessment of marine water quality, that piling and associated activities will disturb sediments, and sediments in this part of the river will contain EQSD chemicals and Cefas-list chemicals (at concentrations above Action Level 1), so these activities will not scope out and will require the further impact assessment stage. All dredging activities will certainly require the WFD impact assessment stage.	Chapter 8: Marine Biodiversity (Volume 1) assess the impacts in relation to marine water quality. Consultation with the Environment Agency has been undertaken to support this chapter and the associated appendices as described in Table 11-2 of Chater 11: Water Environment and Flood Risk (Volume 1). Chapter 2: Site and Proposed Scheme Description (Volume 1) provides a description of the types of wastewater and how wastewater will be generated and treated as part of the Proposed Scheme. It is not practicable to vent the oxygen via a diffuser into the Thames Tideway Tunnel which is located approximately 5km north west of the Site Boundary. Appendix 11-4: Coastal Modelling Studies (Volume 3) details the sediment modelling undertaken of the construction and operation dredging for the Proposed Scheme. The WFD Assessment presented in Appendix 11-1: Water Framework Directive Assessment (Volume 3), has been prepared to address the Environment Agency's comments in regard to water quality.
	An agreement with the Thames Water Utilities LTD (TWUL) should be agreed to connect to the local sewer if proposal opt for Route 1 as the method for discharging wastewater. No operation of Carbon Capture Facility should commence until connection(s) to TWUL supply network agreed and in operation.	The Applicant's response to this comment can be found in Table 11-3 of the Environmental Statement: Chapter 11: Water Environment & Flood Risk.
	Route 2a as one of the wastewater discharge options to discharge wastewater into the River Thames will require a wastewater discharge permit from the Environment Agency.	The preferred approach as detailed in Chapter 2: Site and Proposed Scheme Description (Volume 1) is for treated wastewater to be discharged to the local foul sewer (with or without treatment, depending on trade effluent consents). The Applicant will continue discussions with Thames Water in relation to treated wastewater discharge. Route 2a, as described in Chapter 3: Consideration of Alternatives (Volume 1) is not being progressed as part of the Proposed Scheme. The Applicants assessment of alternatives is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5) and the Jetty Site Alternatives Report (Document Reference 7.6).
Landsul Limited	1. This response is prepared on behalf of Landsul Limited ("Landsul") and Munster Joinery (UK) Limited ("Munster Joinery"). Landsul is the owner, developer and manager of land at Norman Road Belvedere which is partially developed for industrial and warehousing purposes. Part of the land is occupied by Munster Joinery, from where it operates a major distribution function for its UK operations.	Noted

	2. Cory has indicated that, as part of the Cory Decarbonisation Project, it is seeking to compulsorily acquire Landsul's land. It has also indicated that it expects Munster Joinery to be displaced from the land. Landsul and Munster Joinery strongly object to the proposed compulsory acquisition, which has not been justified. The indicative proposals should be altered to avoid the acquisition of Landsul's land and to allow Munster Joinery to continue to operate from the site. Landsul and Munster Joinery are willing to discuss any practical arrangements which may need to be put in place to ensure that the Cory Decarbonisation Project can proceed without interfering with their interests.	The project team has considered alternative locations on all sides of Riverside 1 and Riverside 2 for the Proposed Scheme, and following a robust optioneering exercise and assessment of alternative locations and layouts has concluded in the need to acquire in full the Landsul Site on Norman Road, Belvedare. Consideration of Alternatives is presented in Chapter 3 of the Environmental Statement and the Terrestrial Site Alternatives Report (Document Reference 7.5) and Jetty Site Alternatives Report (Document Reference 7.6).
	3. Section 122 Planning Act 2008 provides that land may only be compulsorily acquired pursuant to a development consent order when two conditions are met. First, it must be shown that the land: a. is required for the development to which the development consent relates, b. is required to facilitate or is incidental to that development, or c. is replacement land which is to be given in exchange for the order land under section 131 or 132.	Following consideration of alternative locations and the operational requirements of the Proposed Scheme , Cory has undertaken a robust optioneering exercise that has considered all relevant policy, environmental, land and operational considerations. This will be reported upon in detail in the DCO application through specific alternatives information, in its Environmental Statement (ES) and in its Design Approach Document (DAD). The Applicants assessment of alternatives is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5) and the Jetty Site Alternatives Report (Document Reference 7.6). It is considered that there is a compelling case in the public interest for the Proposed Scheme and the land required for it. This is reflected in it being considered a project of national significance in the Section 35 Direction, and in the fact that the most recent Energy National Policy Statement, designated on 17 January 2024, makes clear that new carbon capture infrastructure is a 'critical national priority'.
	4. Second, it must be demonstrated that there is a compelling case in the public interest for the land to be acquired compulsorily.	Cory's land use (for both construction and operation) and land acquisition requirements for the Proposed Scheme are comprehensively justified and detailed through specific alternatives information, in the ES, and in the DAD, all of which are available to view within the DCO application.Cory can confirm that the site owned by Landsul and part occupied by Munster Joinery is required in full. In light of this and the robust justification for the Proposed Scheme's land requirements that is provided with the DCO application Cory wishes to reiterate that it remains open and willing to engage constructively (on a 'without prejudice' basis at Landsul and Munster Joinery's option) about the acquisition of the Landsul Site and relocation issues and mitigation.
	5. The "Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land" further explains that applicants must have a clear idea of how they intend to use the land which it is proposed to acquire (paragraph 9). The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development (paragraph 11).	N/A
	6. Case law makes clear that any need for the development identified in an NPS does not, in itself, mean that a compelling case for the acquisition of land is made out. Thus even if there is an urgent need for the development in question, the land proposed to be acquired compulsorily may, on proper analysis, be found to be excessive because the development proposals can be constructed without needing that land to be acquired: see R (FCC Environment (UK) Ltd) v Secretary Of State For Energy & Climate Change [2015] Env LR 22.	Cory's land use (for both construction and operation) and land acquisition requirements for the Proposed Scheme is comprehensively justified and detailed through specific alternatives information, in the ES, and in the DAD, all of which is available to view within the DCO application. The Applicant has undertaken an assessment of alternative sites, this assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). As discussed above, Cory can confirm that the site owned by Landsul and part occupied by Munster Joinery is required in full. In light of this and the robust justification for the Proposed Scheme's land requirements that will be provided with the DCO application Cory wishes to reiterate that it remains open and willing to engage constructively about the acquisition of the Landsul Site and relocation issues and mitigation.
	7. Cory has failed properly to explain why the land is required to deliver the scheme.	The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1) of the ES. The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the preferred development zone, including use of the land currently occupied by Munster Joinery UK Limited.
	8. First, the proposals include a significant degree of optionality, including as to whether one or two carbon capture plants would be constructed: PEIR Vol 1, 2.2.2. It is unclear how this optionality affects the extent of land required for construction and operation of the facility. It is however apparent that not all options currently under consideration would include the land within the development area. Table 3-1 of the PEIR sets out "Alternative Development Areas for the Carbon Capture Facility" and identifies four viable options. Option A would require part of the land but not its entirety. Options B and H would not require the land at all. It follows that in three of the four development options under consideration, the need to compulsorily acquire some or all of the land would be avoided. Options which avoid compulsory acquisition should obviously be pursued in preference to any which do require that interference with Landsul and Munster Joinery's rights.	As detailed in Chapter 2 of the Environmental Statement: Site and Proposed Scheme Description (Volume 1) the optimum solution with regard to two Carbon Capture Plants or one being constructed will be agreed post Carbon Capture Technology Vendor selection as part of the detailed design of the Proposed Scheme. In either scenario the eight hectare size requirement for the Carbon Capture Facility remains the same, as described in Chapter 3: Consideration of Alternatives (Volume 1). The Terrestrial Site Alternatives Report (Document Reference 7.5) explains how the consideration of appropriate development zones for the Carbon Capture Facility has evolved over time, and how the impacts of compulsory acquisition have sought to be balanced against consideration of other potential impacts, given the constraints of the Site amidst the need for the Carbon Capture Facility to be located in close proximity to Riverside 1 and Riverside 2.
	9. Second, and presumably in light of that optionality, the PEIR describes the demolition of Munster Joinery's warehouse as a "worst case scenario" (Vol 1, 2.5.2). This indicates that the land, and the demolition of the warehouse, is not necessary for the construction or operation of the proposals. In Ardent's letter of 15 November 2023 it was again stated that demolition was "likely" but that the loss of the business was the "worst-case". Again, this indicates that the test of necessity is not met. Ardent's letter fails to explain how the four potential development areas relate to the "likelihood" of the land be required. Paragraph 14.7.2 of Vol 1 of the PEIR then, inconsistently, says that "the demolition and relocation of the Munster Joinery is therefore required", but again that demolition is "a worst-case scenario".	Cory's proposals are such that the warehouse on the Landsul Site will need to be demolished for the Proposed Scheme– there is no doubt from Cory's perspective on this position, in light of the optioneering process it has undertaken for site location and layout. Given this, and as noted above, Cory remains open and willing to engage constructively about the acquisition of the Landsul Site and relocation issues and mitigation. Furthermore, as a point of clarity, as progress on these matters has not been made to date, the PEIR assessment could not assume that a relocation site would be found at its time of writing, and so had to presume the loss of jobs from Munster Joinery as a 'worst-case scenario' - that was the focus of the assessment in chapter 14 of the PEIR.

	10. Third, the PEIR fails to provide a clear or coherent explanation as to the use to which the land would be put in construction and operation. It describes a use as a construction compound and laydown area. However, the amount of land required for that purpose is unclear. It is also unclear why such activities could not be carried out elsewhere, and whether the compound is required for the construction of one or both of the potential plants, and in which (if any) of the development options. The uncertainty as to the proposed use of the land during construction was confirmed in Ardent's letter which could not explain either the construction programme, or the nature of the materials which would be laid down on the land. There is no indication in the PEIR as to whether alternative material handling solutions have been considered or how alternative sites for the compound/laydown area have been assessed. This material does not even come close to meeting the test of necessity or to making out a compelling case in the public interest for the acquisition.	The land parcel within which Munster Joinery is located will form part of the core Temporary Construction Compound. It is then required to be used permanently as part of the Carbon Capture Facility. Chapter 2: Site and Proposed Scheme Description (Volume 1) explains all of the different elements which make up the Carbon Capture Facility, which, alongside the drainage proposals in the Outline Drainage Strategy (Document Reference 7.2) and the environmental measures set out in the Outline LaBARDS (Document Reference 7.9) and illustrated in the Design Approach Document (Document Reference 5.6), will take up the full extent of the area required for the Carbon Capture Facility shown on the Works Plans (Document Reference 2.3) including the Munster Joinery land parcel.The indicative layout at Figure 3-1: Terrestrial Site Alternatives Plan (Volume 2) gives one example of how the Carbon Capture Facility could be laid out within the parameters allowed for by the Works Plans (Document Reference 2.3).
	11. It is also unclear how that suggested construction use interacts with the suggestion that in the operation phase, the land will "likely" be used for a "gatehouse and car park; control room and welfare facilities; and workshop and stores" (2.2.80). A "likelihood" of using land for these purposes is not sufficient to justify compulsory acquisition. Again, it is unclear in which of the four development scenarios that use is "likely". It is unclear from the PEIR how those facilities will be constructed within the construction compound/laydown area, or how the development will be phased to deliver these facilities at the end of construction.	
	12. It is also unclear why such facilities could not be incorporated within the existing Riverside 1 and Riverside 2 sites. The PEIR merely asserts that the scheme "will be treated as a separate facility" without explaining why that is a necessity which justifies interfering with Landsul and Munster Joinery's rights.	As illustrated on the Works Plans (Document Reference 2.3) the footprint required for the Carbon Capture Facility is some eight hectares. By comparison, Riverside 1 and Riverside 2 (plus supporting infastructure) together occupy a site of some seven hectares. There is not space available for either the Carbon Capture Facility or the Temporary Construction Compounds with the existing site occupied by Riverside 1 and Riverside 2.
	13. The dimensions given for the development described at 2.2.80 in Table 2-1 of the PEIR would indicate that the land required for those facilities is considerably smaller than the area of land which is proposed for compulsory acquisition. Table 2-1 describes the control room and welfare facilities as having a maximum footprint of 1,500m2. The land identified for compulsory acquisition is more than 5 times that size.	The land which is proposed for compulsory acquisition (as shown on the Land Plans (Document Reference 2.2)) covers the footprint of the entire Carbon Capture Facility, as shown on the Works Plans (Document Reference 2.3). This is not limited to the footprint of the control room and welfare facilities alone.
	14. Overall, the PEIR fails to identify any proper case for the acquisition of the land in question. In preparing the application, the applicant should focus on the promotion of a scheme design which avoids the acquisition of the land. It is clear from the PEIR that there is ample opportunity for that acquisition to be avoided.	Cory can confirm that the site owned by Landsul and part occupied by Munster Joinery is required in full. In light of this and the robust justification for the Proposed Scheme's land requirements that is provided with the DCO application Cory wishes to reiterate that it remains open and willing to engage constructively (on a 'without prejudice' basis at Landsul and Munster Joinery's option) about the acquisition of the Landsul Site and relocation issues and mitigation.
	15. Chapter 15 of Vol 1 of the PEIR provides initial information in respect of socio-economic matters. Paragraph 15.8.16 suggests that the application would "provide a total of 5,261m2 Gross Internal Area (GIA) employment floorspace for industrial and manufacturing activities" and applies an employment density to that figure. It is unclear where this figure is derived from. The proposals do not include industrial and manufacturing floorspace but a bespoke carbon capture facility. By contrast, Munster Joinery's operations include significant on-site and off-site employment supported by and operated through the land which is proposed for acquisition. Chapter 15 contains no analysis of the wider supply chain and distribution network which would be affected by the taking of the land. Chapter 15 contains no analysis of the alternatives studied (including the alternative development areas) and their relative impacts on the employment.	The Applicant has provided an estimate on the number of Full Time Equivalent (FTE) jobs that would be generated by the operation and maintenance of the Proposed Scheme. This estimate is based on experience of the operation and maintenance of Riverside 1 and has taken into consideration roles associated with the functioning of the Proposed Scheme (e.g. administrative and other supporting functions) that may be based within Riverside 1 and/or Riverside 2 (once operational). As set out in Section 15.4 and Section 15.8 of this chapter, the indirect and induced employment generation associated with Munster Joinery UK Limited, located within the Site Boundary, has been calculated. The alternative site locations for the Proposed Scheme are described in Chapter 3: Consideration of Alternatives (Volume 1) and the Terrestrial Site Alternatives Report (Document Reference 7.5).
	16. Landsul and Munster Joinery is firmly opposed to the acquisition of its land. The PEIR, notwithstanding its lack of clarity, demonstrates that the proposed development can proceed without this land. Neither the compulsory acquisition, nor the consequent significant socio-economic effects of that acquisition, is justified. Landsul and Munster Joinery therefore expects that the next iteration of the proposals will focus on the management of construction activities with Munster Joinery continuing to operate at the site.	Cory can confirm that the site owned by Landsul and part occupied by Munster Joinery is required in full. In light of this and the robust justification for the Proposed Scheme's land requirements that is provided with the DCO application Cory wishes to reiterate that it remains open and willing to engage constructively (on a 'without prejudice' basis at Landsul and Munster Joinery's option) about the acquisition of the Landsul Site and relocation issues and mitigation.
London Borough of Bexley	The Chosen Carbon Capture area extends into several conflicting land use designations for this type of development. The definitive adopted boundaries for all designations are shown on the Local Plan policies map, and include - Strategic Green Wildlife Corridor, South East London Green Chain, Site of Importance for Nature Conservation (SINC), Local Nature Reserve, Metropolitan Open Land, Functional Floodplain (Flood Zone 3b), along with being in the Thames Policy Area and partly within the more appropriate Strategic Industrial Land use designation.	The interaction of the Proposed Scheme with land use designations is discussed in the Planning Statement (Document Reference 5.2). The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1) of the ES. The site assessment process for the Carbon Capture Facility is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5) and explains how these designations have been taken into account. The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout.
	The Crossness Nature Reserve forms part of a much larger nature conservation site, which is one of the best examples of London's habitats, as one of the very few remaining areas of Thames-side grazing marsh in London, supporting scarce birds, plants and insects. The larger site, being the Erith Marshes Metropolitan Site of Importance for Nature Conservation (MSINC), receives its metropolitan status because it is one of the most significant sites for nature conservation, not only within Bexley, but within London as a whole. The different status assigned to the Local Nature Reserve and rest of the Erith Marshes MSINC should not lessen the perception of its importance for nature and the vital role it plays in conserving our natural heritage. A zoomed in view of the Erith Marshes MSINC boundary and description can be found in the partial review addendum to the SINC Report, pages 13 to 14 (https://www.bexley.gov.uk/sites/default/files/2021-12/SD24b-sinc-partial-review- paper-appendix-1.pdf) .	Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1) and the Terrestrial Site Alternatives Report (Document Reference 7.5) presents the full consideration given to reasonable alternatives in determining the selected site for the Proposed Scheme, including balancing designations and explaining why it cannot be located further away. Ecological enhancement that will be achieved through onsite and offsite mitigation measures is set out in Chapter 7 of the Environmental Statement: Terrestrial Biodiversity (Volume 1) and the Outline LaBARDS (Document Reference 7.9) that will be secured through provisions of the DCO and Section 106 Agreement.
	The following comments focus on the approach to alternative sites and how this relates to SINC land-use designation policy. Policy SP9 of the Bexley Local Plan commits the Council to protecting, conserving, restoring, and enhancing ecological networks, SINCs, Local Nature Reserves, Strategic Green Wildlife Corridors and local wildlife corridors. Policy DP20 supports this protection. The London Plan policy G6A clearly states that Sites of Importance for Nature Conservation should be protected (See London Plan G6A, paragraph 8.6.2 and 8.6.4). The London Environment Strategy (LES) is also clear that Metropolitan Grade SINC is of the highest priority of protection. Should the proposal be built out on the chosen carbon capture area, it will result in the loss and damage to something which exists in a very few other places in London. See LES Appendix 5 paragraphs A1.2.2 to A1.2.4. (https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/london-environment-strategy).	

Given the strong policy protections afforded to the land use designations on the chosen carbon capture area, significant planning weight is placed on protecting this land from future development. Strong justification for the chosen area, with detailed consideration of alternatives will be an important part of this proposal.	The interaction of the Proposed Scheme with land use designations is discussed in the Planning Statement (Document Reference 5.2). The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1) of the ES. The site assessment process for the Carbon Capture Facility is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5) and explains how these designations have been taken into account. The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout.
Planning policies require that development proposals that are adjacent to or near SINC need to consider if there is potential for 'harm' to the wildlife value of these sites. Policy G6C of the London Plan 2021 states that *Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: 1) avoid damaging the significant ecological features of the site 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site 3) deliver off-site compensation of better biodiversity value.*	The direction provided on policy has been noted. Table 7-1 of the Environmental Statemenet has been updated with further information where appropriate to indicate additional relevant sections of listed policies.
It should be noted that this chosen carbon capture area is not just near and adjacent, but within the SINC designation itself. This part of the policy applies where there is potential for any harm, even where the level of harm is less than significant. Proposals for the chosen carbon capture area will result in harm to the wildlife value of land designated as Metropolitan SINC, therefore applicant needs to demonstrate that this 'harm' to SINC is 'unavoidable' and also that 'the benefits of the development proposal clearly outweigh the impacts on biodiversity' before applying the London Plan mitigation hierarchy Consideration should also be given to whether there are any reasonable, less damaging, alternative solutions, locations or sites Development that has the potential to harm the wildlife value of SINC may be considered unavoidable where all other reasonably available sites, of lower ecological value, and alternative solutions have been carefully considered and discounted with sufficient justification. Chapter 3 of the PIER is the preliminary consideration of alternatives, which will be used to support the judgement as to whether harm is unavoidable. The level of detail in this chapter does not provide sufficient justification for the chosen options. For example, no detail has been provided to justify why Option E and Option F are not suitable for the scheme. These sites are located within designated Strategic Industrial Land, which is a more appropriate land use for the type of development proposed. In addition, Option G is not evidenced as to why it is an unsuitable location. The Port of London Authority has highlighted this location in its Thames Tidal Masterplan as an excellent opportunity for the decarbonisation project to bring the Middleton Jetty into use. None of these options should be discounted until they have been robustly tested. It is also not clear, whether the Carbon Capture area needs directly adjacent to the Riverside 1 and 2 and it is not evident if alternative options for locating the project further away have been considered?	Chapter 3: Consideration of Alternatives (Volume 1) of the ES and the Terrestrial Site Alternatives Report (Document Reference 7.5) presents the full consideration given to reasonable alternatives in determining the selected site for the Proposed Scheme, including balancing designations and explaining why it cannot be located further away
The applicant must also demonstrate that 'the benefits of the development proposal clearly outweigh the impacts on biodiversity'. The PIER says that 'the 'Do Nothing' scenario would be contrary to the UK's commitment to achieve net zero carbon emissions by 2050. Consequently, it is not considered further.' However, development on the chosen carbon capture area is also contrary to the UK's commitment, to halt and reverse biodiversity loss and protect 30% land for nature by 2030 and by 2042 restoring or creating 500,000ha of wildlife rich habitats and 75% of protected sites to favourable condition to secure their wildlife value for the long term. The Environmental Improvement Plan (EIP23) sets out government plans for significantly improving the natural environment. Also, as summarised in table 7-1 of the PIER 'Local Sites have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education'. For the chosen site, these two conflicting priorities need to be explored in greater detail by the applicant, with sufficient information provided to allow the decision maker to carefully weigh up the conflicting priorities, before making an informed judgement.	Chapter 3: Consideration of Alternatives (Volume 1) of the ES explains why the Do Nothing scenario is not a reasonable alternative to developing the Proposed Scheme. The Government has recognised that new carbon capture infrastructure is of critical national priority. TheTerrestrial Site Alternatives Report (Document Reference 7.5) explains how ecological impacts were factored into the scheme development process, and that the chosen Development Zone affects only a small part of the Crossness LNR. The Proposed Scheme is not anticipated to have significant effects on biodiversity, as stated in Chapter 7: Terrestrial Biodiversity (Volume 1). Additionally, the Proposed Scheme will achieve at least a 10% net gain for biodiversity, as set out in Appendix 7-1: Biodiversity Net Gain Report (Volume 3).The Outline LaBARDS (Document Reference 7.9) presents the proposed approach to mitigation, with detailed measures secured through the provisions of the DCO.
It is noted that in Paragraph 2.4.10 of the PEIR the applicant has accepted the previous EH scoping comments that construction working hours for noisy activities will typically be limited to 08:00 -18:00 Mondays to Fridays, 08:00 -13:00 on Saturdays with no noisy works on Sundays or Public Holidays. There is however, still a discrepancy in the PEIR as references to noisy construction times in Paragraph 6.7.3 do not fully reflect the assurances made Chapter 2.	During construction, standard working hours for the landside activities are Monday to Friday 07:00 to 19:00. On Saturdays, standard working hours are 07:00 to 13:00, with no working on Sundays or Bank Holidays. The working hours do not apply to construction works where these are (a) are carried out within existing buildings or buildings constructed as part of Proposed Scheme; (b) are carried out with the prior approval of the relevant planning authority; or (c) are associated with an emergency. These construction hours replicate those used for Riverside 2.
It is accepted that there will be a need for some activities to be undertaken outside of permitted hours (e.g. jetty works involving tidal considerations). Appropriate dispensation arrangements and prior consent agreements under the provisions of the Control of Pollution Act 1974 will need to be established on due course as development proposals are finalised. The proposed concept of an Outline Code of Construction Practice (OCOCP) is considered acceptable. This will be submitted as part of the DCO application and can include a more detailed consideration of mitigation measures required to minimise potential noise, vibration and disturbance to local residents and businesses. It is recommended that particular attention will need to be paid to impacts associated with piling activities.	Marine construction activities are expected to be 24 hours and 7 days a week. The remaining comments are acknowledged. Further information can be found in Table 6-3 of the ES: Chapter 6: Noise and Vibration.
The methodologies and preliminary conclusions outlined in the remainder of chapter 6 for both construction and operational phases are considered satisfactory. It is accepted that further work will need to be carried out with regard to selection and siting of ASHP fans.	No response required. Further information can be found in Table 6-3 of the ES: Chapter 6: Noise and Vibration.
Descriptions in table 7-1 should relate to considerations for the assessment of the proposed development. For example, the description of the London Plan policy refers to what the policy says boroughs should do in their development plans, rather than saying that should be considered in the assessment of a proposal. The Council already has policies in its Local Plan which address the London Plan requirements on what boroughs should include in their development plans. Using policy G6 as an example, Parts A, and C are particularly important when in considering the principle of development on a metropolitan SINC, as discussed in comments relating to chapter 3; however, these have not been mentioned in the table 7-1 description. Table 7-1 references biodiversity action plans, in that regard, the following are not mentioned:	The direction provided on policy has been noted. Table 7-1 of the ES has been updated with further information where appropriate to indicate additional relevant sections of listed policies. The direction provided on policy these have has been noted. Table 8-1 of the ES has been updated with further information where appropriate to indicate additional relevant sections of listed policies.
· The 2018, London Environment Strategy Chapter 5 includes Habitat creation targets for London - Species-rich woodland, Flower-rich grassland, Rivers and streams, Reedbeds. Appendix 2 has London Biodiversity Action Plan Review of Priority Species – based on 2007 figures and BAP Priority Habitats. The GIGL pages include achieve for London Species Action Plans and Habitat Action Plans, plus update to species	
· The 2019, GLA priority species list spreadsheet tool London Priority Species London City Hall), includes opportunity species where there are likely to be opportunity to provide new or enhanced areas of habitat for across London's greenspaces or development, includes info on habitat requirements. 64 species in Bexley.	This information source is noted, although it has not formed part of the decision making with regards habitat creation and enhancement in relation to the Proposed Scheme. The primary focus for both has been mitigating effects on Crossness LNR's habitats and species, improvement of the LNR's habitats post-development and provision of compensatory habitat replacement for those important habitats outside the LNR but falling within the Proposed Scheme footprint. Thus, local conditions specifically have driven the development of mitigation, compensation and enhancement measures rather than broad lists of species provided for Greater London as a whole. The direction provided on policy these have has been noted. Table 8-1 of the ES has been updated with further information where appropriate to indicate additional relevant sections of listed policies.

· Published 2022, the updated List of priority habitats and species in England, Habitats and species of principal importance in England - GOV.UK (www.gov.uk). UK BAP habitats species actions and strategies. Check most recent strategy	The latest list of priority habitats and species has been used when compiling baseline data for the impact assessment. The direction provided on policy these have has been noted. Table 8-1 of the ES has been updated with further information where appropriate to indicate additional relevant sections of listed policies.
· National Planning Practice Guidance is described in the context of EIA and AA requirements; however, no reference has been made to the Natural environment National Planning Practice Guidance.	Table 7-1 of the ES has been updated to reference the Natural Environment guidance section of the NPPG2. The direction provided on policy these have has been noted. Table 8-1 of the ES has been updated with further information where appropriate to indicate additional relevant sections of listed policies.
· Table 7.2 - 3.3.9 - table 7-1 has not been updated to include reference to CIEEM EcIA guidelines, it refers to preliminary assessments and report writing. Although the EcIA guidelines are referred to in the main text	Reference to this document has been added to Table 7-1 of the ES.
Table 8-1 refer to Chapter 7 comments in relation to Table 7-1. The same comments apply.	The direction provided on policy these have has been noted. Table 8-1 of the ES has been updated with further information where appropriate to indicate additional relevant sections of listed policies.
Officers note that the Belvedere Power Station jetty (disused) which is located within the site has been identified as a non-designated heritage asset. The jetty is not locally listed. The heritage value of the disused jetty is outlined within paragraphs 9.6.5-9.6.9 of the PEIR report.	The potential effects on the heritage significance (value) of the Belvedere Power Station Jetty (disused) resulting from the Proposed Scheme have been assessed in Section 9.8 of the ES for both scenarios (retention and demolition). It is agreed that retention of the Belvedere Power Station Jetty (disused) (with modifications) would result in a lower magnitude of change and significance of historic environment effect to the heritage asset.
It is noted further that the jetty may, or may not be demolished as part of the actual scheme. As an identified non-designated heritage asset, it would be preferred if the jetty could be retained and utilised (including any necessary upgrading works) as part of the forthcoming proposals.	
Impacts upon the setting of designated heritage assets will be required to be fully assessed against the submission scheme. The assessment of any impacts arising as a result of the submission scheme upon the setting the identified designated heritage assets should be undertaken in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	Impacts upon the setting of designated heritage assets resulting from the Proposed Scheme are fully assessed in Section 9.8 of the ES.
Considerations of the effects at this stage are considered to be premature until the submission scheme has not been set and therefore formally assessed.	The assessment of likely effects presented in this ES chapter forms the final heritage assessment for the purposes of the DCO application. The assessment considers the preliminary assessment provided in the PEIR17 and takes into account the design of the Proposed Scheme as described in Chapter 2: Site and Proposed Scheme Description (Volume 1). Since publication of the PEIR17, further research and assessment has been carried out to prepare Chapter 9: Historic Environment of the ES, and where relevant, the assessment has been updated. As the mitigation strategy remains unchanged, this has not affected the conclusions in respect of the significance of residual effects.
The proposal will present a significant step change in landscape and built character. The Townscape and Visual chapter of the PIER describes the potential visual effects of the development. This is challenging to assess without images of the selected views.	Appendix 10-1: Visual Assessment Photographs (Volume 3) and Appendix 10-4: Photomontages (Volume 3) provide images of the selected viewpoints. Appendix 10-4: Photomontages (Volume 3) illustrate the Proposed Scheme from each viewpoint, with the inclusion of mitigation.
Townscape Visual Impact Assessments (TVIA) should reflect the parameters of the final scheme which is to be submitted, when this is confirmed. Outcomes relating to effects are likely to be premature in the absence of assessment against the scheme which is to be submitted to the Planning Inspectorate.	The assessment presented in Section 10.7 of this chapter reflects the design of the Proposed Scheme that is the subject of this DCO application. The parameters of the design of the Proposed Scheme that have been assessed are described in Section 2.3 of Chapter 2: Site and Proposed Scheme Description (Volume 1) and controlled by a requirement of the Draft DCO (Document Reference 3.1).
In terms of the 'next steps' outlined within the Chapter 10, the further work to involve a Winter walkover is welcomed. This will assist with the assessment of potential impacts for both the TVIA and the heritage considerations of the impact upon the setting of neighbouring designated heritage assets.	A winter walkover was carried out on 29th November 2023, and the results from this have informed the baseline for the assessment presented in Chapter 10 of the ES: Townscape and Visual. Appendix 10-1: Visual Assessment Photographs (Volume 3) provides images of the selected viewpoints during winter months.
As is currently the case, the applicants should continue to liaise with the Local Planning Authority regarding viewpoints for the TVIA, particularly where the Winter walkover, or the confirmed parameters may highlight additional locations which may require further consideration.	The Zone of Theoretical Visibility (ZTV) along with suggestion for viewpoint locations was reissued to LBB on 21st November 2023 for comment and recommendations on Study Area and selected viewpoints; and any sensitivities in relation to townscape or visual receptors which needed consideration. Further information is provided in Table 10-2 of Chapter 10 of the ES: Townscape and Visual.
The retention and reuse of the existing jetty, whether for industrial, heritage or biodiversity purposes, would be welcomed. Its retention would be beneficial as it may minimise waste and align with circular economy principles. The retention of locally significant structures can also contribute towards placemaking.	The position regarding the Belvedere Power Station Jetty (disused) is described in Section 10.4 of Chapter 10 of the ES: Townscape and Visual. The Applicant will make a decision regarding whether this will be demolished as part of the construction of the Proposed Scheme or retained at the detailed design stage. Further information is provided in Chapter 2: Site and Proposed Scheme Description (Volume 1).
It's not clear at this stage what the layout of the structures will be on site as the application is addressing the general site location rather than the layout. As the applicant is aware, part of the proposal falls on protected habitats and Metropolitan Open Land (MOL). MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to green belts - please refer to other consultees' comments on these matters as this may influence the location of the facility.	The indicative layout of the Proposed Scheme is presented on the Works Plans (Document Reference 2.3) and further description is provided in Chapter 2: Site and Proposed Scheme Description Volume 1). The Planning Statement (Document Reference 5.2) demonstrates how the Proposed Scheme complies with relevant planning policies, and where it does not comply with relevant planning policies it explains how the benefits of the Proposed Scheme outweigh any adverse impacts. This chapter considers the Areas of Accessible Open Land and Non-Accessible Open Land within the Study Area (see Paragraph 10.5.31 below for a description of Accessible Open Land and Non-Accessible Open Land) some of which include land that is designated as MOL.
The proposal is within the Thames Policy Area and Policy DP18 Waterfront development and development including, or close to, flood defences in the Local Plan applies. The proposed rights of way within the site are therefore welcomed as they work towards providing more choice of access to the river. This also supports Policy DP17 Publicly accessible open space, that requires new development to provide access to open space, particularly where there is a deficiency in access.	Improvements in access in the Mitigation and Enhancement Area and in the BNG Opportunity Area are referenced in the OutlineLaBARDS (Document Reference 7.9) would include provision of improved access, interpretation, and activation on PRoW within open areas.
The adjacent industrial area is identified as deficient in access to open space, therefore the new route 'Opportunity 2' is particularly important due to the potential positive effect it may have. In addition, any improvements to the existing Public Right Of Way (PROW) 'Opportunity 4' are welcomed as this would improve the link to a residential area, allowing for alternative sustainable travel options for staff at the site.	Access improvements referenced in the Outline LaBARDS (Document Reference 7.9) would include provision of improved access, interpretation, and activation on PRoW within accessible open spaces.
It is difficult to assess the massing at this stage without a site layout plan with indicative heights of the proposed structures. The following comments are based on information deduced in tables and text in the PIER (sic).	Indicative heights of the proposed structures are included within the submitted application for Development Consent.
The facility requires C02 storage tanks in a tall or low vessel option. The low vessel option requires a larger footprint, but the tall vessel option will be highly visible. The table 2-1 in the PIER (sic) shows this may be up to 100m long and wide, and 80m in height. It's unclear whether this is captured in the sketch view from Norman Road. The size of these vessels will likely affect the visual amenity of the surroundings, which is why a low vessel option is likely to be more appropriate and has a clear advantage over the tall vessel option.	The Applicant notes a preference for low vessel option for CO2 storage tanks.
The absorber column stacks are indicated on the Zone of Theoretical Visibility (ZTV) map as up to 113m high. Paragraph 2.1.11 in the PIER states that this will be comparable to the height of the stacks for Riverside 1 & 2. The ZTV demonstrates how wide a radius would be able to see the stacks, including Conservation Areas in Erith and Locally Protected Views. The applicant should refer to Policy DP13 'Protecting local views' in the Local Plan for the criteria development must meet if it has the potential to affect local views.	Policy DP13 'Protected local views' is referenced in the assessment of effects on views, presented in Section 10.7 of Chapter 10 of the ES: Townscape and Visual. The Planning Statement (Document Reference 5.2) demonstrates how the Proposed Scheme complies with relevant planning policies.Where the Proposed Scheme does not comply with relevant planning policies, including Policy DP13, the Planning Statement explains how the benefits of the project outweigh any adverse impacts.
Paragraph 2.1.11 of the PIER also states that one column is required for each carbon capture plant, therefore if there is one combined facility then only one will be required. Given the potential effect of the visibility of these columns, one combined facility may therefore be preferable from an urban design perspective.	The assessment presented in Section 10.7 of Chapter 10 of the ES: Townscape and Visual, is based on two Absorber Columns(s) and Stack(s), as this is considered to be the worst case scenario. The decision as to whether there will be one or two Absorber Column(s) and Stack(s) will be made at the detailed design stage.
Paragraph 2.2.28 notes that there may be a requirement for another column for distillation, however this is subject to design development. There are several other proposed columns and towers that would be up to 55m in height shown in Table 2-1 of the PIER. As this is a Strategic Industrial Location, the Local Plan Policy DP12 Tall Buildings and building heights states that buildings should not normally be more than 25m high, which is generally equivalent to 8 storeys. The applicant should demonstrate how the points within Policy DP12 and D9 Tall Buildings in the London Plan have been met.	Bexley Local Plan policy DP12 has informed the assessment undertaken in Chapter 10 of the ES: Townscape and Visual. The Planning Statement (Document Reference 5.2) and Policy Accordance Tracker (Document Reference 5.3) demonstrate how the Proposed Scheme complies with relevant planning policies and where it does not comply with relevant planning policies, including building height limits in the Bexley Local Plan 20236 (DP9 and DP12), the Planning Statement and Policy Accordance Tracker (Document Reference 5.3)explain how this is operationally necessary to the Proposed Scheme.
The Lead Local Flood Authority has no specific comments to make but will be interested to review the FRA and to see in which ways it is felt that risk from surface water is not accurately represented by the EA mapping.	No response required.
The Lead Local Flood Authority are pleased to see that issues raised by the LLFA in the initial scoping exercise have now been addressed, such as considering the risk from groundwater flooding.	Noted

	Implications that the loss of the greenfield marshland area to the carbon capture development will have on the borough's climate resilience need to be set out.	Chapter 12 of the ES: Climate Resiliance is intended to be read alongside Appendix 12-1: In-combination Climate Change Impacts Assessment (Volume 3), to consider the extent to which climate change exacerbates an assessed effect on an environmental receptor, including flood risk and terrestrial biodiversity. Further detail on flood risk and terrestrial biodiversity are provided in Chapter 11: Water Environment and Flood Risk (Volume 1), Appendix 11-2: Flood Risk Assessment (Volume 3)and Chapter 7: Terrestrial Biodiversity (Volume 1). The scope of this chapter is to evaluate how the Proposed Scheme is designed to withstand and adapt to climate variables such as temperature fluctuations and extreme weather events. While it is understood the importance of considering the broader implications of land use changes on climate resilience, evaluating the borough's overall climate resilience falls outside the scope of the assessment that has been conducted. However, Chapter 13: Greenhouse Gases (Volume 1) considers the construction phase and operation phase GHG emissions from Land use, Land Use Change and Forestry (LULUCF), such as the GHG emissions released as a result of the change in land use from the baseline scenario during the construction phase. This considers loss of carbon storage from permanent and temporary loss of habitat and changes to carbon storage through reinstatement and improvement to habitat. Chapter 13: Greenhouse Gases (Volume 1) (Table 13-10) identifies the GHG emissions with and without the Proposed Scheme operating regarding LULUCF.
	It will be important to understand the whole-life cycle of greenhouse gasses associated with the project, not just the built structure, but also the processes involved in its operation. The amount of greenhouse gasses including carbon dioxide resulting from the processes associated with the operation of the carbon capture facility should be clearly set out, including emissions from sourcing of materials and chemicals to be used in the capturing of carbon, and emissions associated in transportation of captured carbon to its end destination.	The construction and operation phases of the Proposed Scheme have been considered in relation to the PAS 2080:202324 lifecycle stages. The assessment methodology presented in Section 13.4 of this chapter sets out the emission sources covered for the calculation of GHG emissions in construction and operation phases. For the operation phase this includes, but is not limited to, the use of materials in the carbon capture process and the transport of captured carbon to its end destination. The GHG emissions calculated for the construction and operation phases of the Proposed Scheme are presented in Section 13.8 of this chapter.
	The greenhouse gasses produced by the carbon capture facility itself during the processing of capturing of carbon, should be clearly set out.	GHG Emissions are discussed in Chapter 13 of the Environmental Statement: Greenhouse Gases (Volume 1).
	Carbon Capture needs to result in permanent carbon storage, meaning that the carbon must remain undisturbed for centuries to millennia, therefore, any risks of carbon deposited into the North Sea escaping back into the atmosphere need to be fully explained.	GHG Emissions are discussed in Chapter 13 of the Environmental Statement: Greenhouse Gases (Volume 1). The permanent sequestration of capture carbon within former oil and gas fields under the North Sea is a key element of Government's stratety to meet net zero targets. In December 2023, Cory announced an exclusive commercial relationship with Viking CCS to collaborate on the transport and storage of shipped CO2 captured from the Riverside EfW facilities. More information on Viking is given in the Project Benefits Report.
	Any other environmental implications of chemicals to be used within the process, and the operation itself, should be clearly set out in the appropriate chapter, including potential impacts on releasing water used in the process to local water sources, but also any impacts associated from sourcing the materials and chemicals, etc.	Chapter 2 of the Environmental Statement: Site and Proposed Scheme Description (Volume 1) covers the intentions for wastewater discharge, in relation to solvent usage and the proposals for dealing with waste solvent.
	Table 14-1:	N/A
	• The Green Infrastructure Study 2020 is referred to in the text, but not in this table. • The Bexley Local Plan 2023. In terms of Land Use, the Local Plan policies map is the graphical the map shows the land uses associated with the scheme. Policy DP20 is also relevant. • Bexley's public health strategies should be included https://www.bexley.gov.uk/services/health-and-social-care/bexleys-public-health/our-plans-help-us-live-better , the strategies set priorities, for example, for open space and design to create an environment that inspires physical activity	Green infrastructure and Policy DP20 have been considered in Chapter 14 of the Environment Statement.The Planning Statement (Document Reference 5.2) and the Design Approach Document (Document Reference 5.6) have also given regard to the relevant studies, plans, and strategies.
	This chapter reports the preliminary assessment of the likely significant effects of the proposed scheme on landside transport during construction and operation. Table 18-2 collates previous consultee comments and provides a response to each from the applicant. Previous comments made by the Highway Authority have been satisfactory addressed by the applicant.	No response required.
	To collected bassline date Cory have completed a desktop study reviewing the following information;	No response required.
	• Census Journey to Work Data; • 2021 Census; • Road Traffic Statistics; • Crashmap accident data; and • Riverside Energy Park Environmental Statement: Transport Assessment (TA).	No response required.
	In addition to this using the survey area and scope previously agreed, traffic surveys have been completed using ATC and MCC to gather an understanding of existing transport conditions and flows.	No response required.
	Bassline data will be used to inform the forthcoming Transport Assessment (TA) for both the construction and operational phases. The applicant has stated the TA will include junction capacity assessment to be submitted.	No response required.
	The applicant has detailed the assessment methodology for both the construction phase (peak year 2028) and operational phase (2033). The proposed approach follows IEMA guidelines which is accepted by the Highway Authority.	No response required.
	The future baseline for landside transport has been developed using the DfT Trip End Model Presentation Program (TEMPro) growth factors. The TEMPro growth factors have been applied to the traffic survey data. Proposed future traffic flows have been published in table 18-13	No response required.
	The applicant has specified a Construction Workforce Travel Plan (CWTP) and Workforce Travel plan will be produced. A draft copy of both documents should be shared with the Highway Authority for review. In addition to this, a draft copy of the TA and Construction Management plan should also be shared with the Highway Authority.	A Framework Construction Traffic Management Plan (Framework CTMP) (Document Reference 7.7) has been prepared, including the measures that will develop into a Construction Workforce Travel Plan (CWTP) to mitigate construction effects. A full CTMP(s) will be developed once Contractor(s) have been appointed. When operational, the Proposed Scheme will be incorporated within an update to the existing Workforce Travel Plan (WTP) for Riverside 1 and once operational Riverside 2. These documents, and the Transport Assessment have been based on the positions agreed with LBB on the recent DCO application for Riverside 2.
Marine Management Organisation	The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.	No response required.
	The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence . Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.	No response required.
	In the case of Nationally Significant Infrastructure Projects ("NSIPs"), the 2008 Act enables Development Consent Order's ("DCO") for projects which affect the marine environment to include provisions which deem marine licences	No response required.

	As a prescribed consultee under the 2008 Act, the MMO advises developers during preapplication on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.	No response required.
	Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("dML") enable the MMO to fulfil these obligations.	No response required.
	Further information on licensable activities can be found on the MMO's website. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note	No response required.
	The Project comprises of four key areas: the Carbon Capture Facility, the Proposed Jetty, the Mitigation Area, and the Temporary Construction Compounds.	No response required.
	The decarbonisation hub consists of two carbon capture plants, one at the Riverside 1 energy from waste (EfW) facility and one at the Riverside 2 energy from waste facility. The infrastructure is to capture a minimum of 95% of carbon dioxide (CO_2) emissions from Riverside 1 and 95% of CO_2 emissions from Riverside 2 once operational, equivalent to approximately 1.3 million tonnes (Mt) CO_2 per year.	No response required.
	The Proposed Jetty will be a new export structure within the river Thames, to be used to export the CO_2 captured, as part of the Carbon Capture Facility, via vessels. The Mitigation Area is land identified as part of the ongoing Biodiversity Net Gain (BNG) Assessment to provide habitat mitigation, compensation, and enhancement. The Temporary Construction Compounds are areas to be used during construction and will be reinstated to their original use following completing of the construction works for the Project.	No response required.
	The MMO has reviewed the consultation documents that have been available online (https://corydecarbonisation.co.uk/document-library/#peir) since 18 October 2023 in consultation with our scientific advisors at the Centre for Environment, Fisheries and Aquaculture (Cefas) and set out our initial comments below	No response required.
	The MMO has focused on the following chapters of Volume 1 of the Preliminary Environmental Information Report (PEIR) (dated October 2023), however has also reviewed some figures and appendices in Volumes 2 and 3: • Chapter 1 Introduction • Chapter 2 Site and Proposed Scheme Description • Chapter 8 Marine Biodiversity • Chapter 21 Cumulative Effects	No response required.
	The MMO reserves the right to make further comments on the Project throughout the preapplication process and may modify its present advice or opinion in view of any additional information that may come to our attention.	No response required.
		Noted
	Benthic Ecology	Noted
	1.1. Given the extent to which the project may potentially impact marine benthic ecological receptors, the MMO considers that the information presented in the baseline assessment and impact assessment to be commensurate and fully defendable.	No response required.
	1.2. The intertidal and subtidal surveys would have benefited from the inclusion of a greater number of sampling stations (i.e., than the six in each case) and, for the intertidal area, to have ensured that samples were taken from all habitats (if there were multiple habitats) that were evident from the walkover survey, where possible. However, the MMO is content that no further actions need to be taken regarding this at this time.	No response required.
	1.3. The mitigation measures (included as those embedded in the design) presented in Section 8.7 all appear sensible and should each reduce potential ecological impacts of the project to some extent. The additional measures given in Section 8.9 also look beneficial, especially the concept of increased habitat heterogeneity (as mitigation for loss of/disturbance to intertidal habitats) through terracing and the use of ropes on pier legs for example.	No response required.
	1.4. The MMO considers that the list of mitigation should be updated to include something along the lines of ensuring that the dredging method adopted (during capital dredging and/or maintenance dredging operations) will be selected, where possible, based on an approach which results in a reduced impact on suspended sediment release. However, the MMO notes that reference to this being considered is later given in Section 8.8.98, although this is not formally presented as a mitigation measure.	No response required.
	Coastal Processes	N/A
	1.5. The MMO does not have any major concerns regarding the matters or receptors as the key ones in terms of coastal processes, namely potentially elevated suspended sediment concentrations and water column water quality, have been scoped in for both construction and operational phases. This will also include deposition within the estuary and any Marine Conservation Zones (MCZs).	An assessment of the potential effects on the Medway Estuary MCZ is included in Section 8.8, where relevant. The sediment plume modelling has also predicted that the Swanscombe MCZ will not be impacted by any elevated suspended sediment concentrations. Appendix 11-4 of the Environmental Statement: Coastal Modelling Studies (Volume 3) provides an assessment of the suspended sediments to demonstrate the range of dispersion and settlement during the construction and operation activities..
	1.6. Sediment quality around the proposed dredge pocket and also sediment around the site of disused Belvedere Power Station Jetty should be assessed, as disturbance into the water column could be significant depending on the dredge technique used. For instance, in Option 3 over 180,000 cubic metres (m3) of sediments will be dredged.	An assessment of the potential effects from changes to sediment quality is provided in Section 8.8 of the Environmental Statement. Appendix 11-1 of the Environmental Statement: Water Framework Directive Assessment (Volume 3) provides an assessment in relation to water quality including direct and indirect impacts relating to the biological, hydromorphological and chemical quality indicators within the River Thames. This chapter also summarises the findings and conclusions regarding water quality.

	1.7. The MMO considers that the Outline Emergency Preparedness and Response Plan (OEPRP) should consider the release of all the various chemical into the marine environment (Section 2.6.22). Consideration for bunding should also be made.	It is not considered that bunding is appropriate for use in the marine environment due to the tidal nature of the River Thames, the Outline EPRP (Document Reference 7.11) considers the release of chemicals. The Outline CoCP (Document Reference 7.4) contains measures to prevent the release of chemicals into the marine river environment during the construction phase. The Outline EPRP (Document Reference 7.11) contains measures to prevent the release of chemicals into the marine river environment during the operation of the Proposed Scheme. Measures regarding bunding of potentially hazardous materials during construction and operation phases of the Proposed Scheme are included in the Outline CoCP (Document Reference 7.4) andthe Outline EPRP (Document Reference 7.11), respectively. These measures are also detailed in Section 11.7 and Section 11.9 of the Environmental Statement.
	Dredge and Disposal	N/A
	1.8. The proposed carbon capture elements of the project will not involve the storage of uncontained gaseous carbon dioxide in the marine environment (e.g., through injection into subsea geological formations). Rather, captured carbon dioxide will be liquefied and stored in pressurised containers for export via ship. As such, these elements of the proposal are not relevant under the London Convention/Protocol.	No response required.
	1.9. The report refers to benthic inter- and sub-tidal surveys from which some samples were collected for sediment chemistry analysis alongside particle size. It is stated that analyses were conducted by laboratories validated by the MMO. However, other than this brief description in paragraphs 8.4.15 – 8.4.17, the MMO can find no corresponding resultant data or any other description of the number of samples or results of the analyses. The MMO would expect these data to be published in full in the MMO Results Template in the resulting ES. Therefore, as of the time of writing, it is not possible to substantively comment on these data.	The full results of the contaminant analysis are presented in Annex C and D of Appendix 11-1: Water Framework Directive ssessment (Volume 3) in the MMO results template. A summary is provided in Section 8.6 of the Environmental Statement. Sediment concentrations of metals and polycyclic aromatic hydrocarbons (PAH) were encountered above AL1 criteria at a number of sample locations within the intertidal and subtidal zone of the Study Area. In addition, the concentration of Mercury was identified at 4.71mg/kg, which is above the AL2 criteria (3.00 mg/kg) at one of the intertidal sampling sites. This was the only occasion of contamination exceeding AL2 and it was only at Appendix 11-1 of the Environmental Statement: Water Framework Directive Assessment (Volume 3) provides the data in the MMO Results Template.
	1.10. The report lists several dredge methods which vary considerably in the extent to which they may lead to increases in suspended sediment concentrations at the dredge site and its immediate vicinity. It should be confirmed if the assessment of this impact pathway will consider the worst-case scenario use of water injection (WID) for all 180,000 m3 of material (i.e., the total anticipated worst-case volume of material that would be removed by WID). The MMO would consider this method to be worstcase for this impact pathway as none of the material dredged would be removed from the water column (as with trailer suction hopper or backhoe).	As described in Chapter 2: Site and Proposed Scheme Description (Volume 1) the dredging method to be used will be backhoe. This is the method assessed in this ES. Chapter 2: Site and Proposed Scheme Description (Volume 1) states that backhoe dredging will be the dredging method to be adopted for the Proposed Scheme and the assessments presented within This Environmental Statement (ES) and supporting appendices are based upon this method.
	1.11. The MMO strongly recommends that, if it is decided that WID will be the primary dredge method, that engagement is undertaken with the Port of London Authority (PLA), the Environment Agency (EA) and the Zoological Society of London (ZSL) to ensure that the large volume does not lead to adverse effects on migratory fish. Please see further comments regarding this in point 1.15 below.	As described in Chapter 2 of the Environmental Statement: Site and Proposed Scheme Description (Volume 1) the dredging method to be used will be backhoe. This is the method assessed in this ES. Chapter 2: Site and Proposed Scheme Description (Volume 1) states that backhoe dredging will be the dredging method to be adopted for the Proposed Scheme, rather than WID, and the assessments presented within This Environmental Statement (ES) are based upon this method.
	1.12. The MMO does not fully understand why "water quality and release of contaminants (marine habitats, intertidal and subtidal benthic communities, marine plants and macroalgae and fish)" is scoped into the operational phase of the works but not the construction phase. The dredging of 180,000 m3 of material could potentially serve as a pathway for this impact. On this point, the MMO notes that in the Table of Scoping Opinion Responses, the opinion comments refer to contaminants "carried on board vessels", however there does not appear to be any other scoping comments referring to other aspects of contaminants (e.g., chemical use during construction or contaminants in dredged material).	As described in Paragraph 8.4.2 of the Environmental Statement, water quality and release of contaminants (marine habitats, intertidal and subtidal benthic communities, marine plants and macroalgae and fish) these have been scoped into the construction and operation phase assessment presented in Section 8.8 of Chapter 8 of the Environmental Statement: Marine Biodiversity.
	1.13. The MMO also noted that in Chapter 8 (8.8.74) it states that impacts will include "changes to water and sediment quality from increased levels of suspended solids, mobilisation of sediment bound contaminants…due to maintenance dredging". However, it appears that this does not extend to the proposed 180,000 m3 of material required for capital dredging. Clarification should be provided as to whether the capital dredging is being considered separately.	A discrete assessment of the potential effects from capital dredging is presented in Section 8.8 of Chapter 8 of the Environmental Statement.
	1.14. There are considerable information gaps in the report to fully comprehend the scale of the dredging and possible disposal activity. There is little to no indication as to the depth of material to be removed, when the material was most recently dredged, or any indication as to the potential contaminant levels. Even at this early stage, the MMO would have expected indicative information to be available. At the point of ES, all of this information should be presented clearly and in detail.	Further detail with regard to the capital and maintenance dredging associated with the Proposed Scheme is provided in Chapter 2 of the Environmental Statement: Site and Proposed Scheme Description (Volume 1) and Appendix 11-4: Coastal Modelling Studies (Volume 3). Chapter 2: Site and Proposed Scheme Description (Volume 1) details the scale of the dredging and the potential disposal methods, as does the Limits of Dredging Plan (Document Reference 2.11). Appendix 11-1: Water Framework Directive Assessment (Volume 3) provides an assessment in relation to water quality within the River Thames and provides information regarding sediment sampling (to be agreed with the MMO in consultation with CEFAS prior to commencement of works). Should unacceptable impacts be determined following the sediment sampling then appropriate mitigations measures will be implemented in discussion with the Environment Agency.
	Fisheries and Fish Ecology	N/A
	1.15. In general, the PEIR is well-informed in relation to fisheries and fish ecology, however it is lacking some detail that would be expected at this stage. The relevant fish receptors have been identified, including acknowledging those with spawning and nursery grounds in the river Thames and its estuary. Fish receptors have been appropriately classified into demersal, pelagic, migratory and elasmobranchs categories. Characterisation of fish receptors also includes data from EA Transitional and Coastal waters (TRaC) fisheries monitoring surveys and a site-specific baseline beam trawl survey. This approach is appropriate; however, the potential limitations of these surveys should be acknowledged.	The limitations of the surveys undertaken have been addressed within Appendix 8-1: Marine Baseline Surveys (Volume 3) of the Environmental Statement. Fish surveys within the Study Area were limited to subtidal benthic trawls due to health and safety issues. These included no safe access to the foreshore across the river wall to deploy fyke nets, and the substrate within the Study Area not being appropriate to deploy seine nets (extensive mudflats). Prior to conducting fish surveys, the project team consulted with the Environment Agency on the most appropriate methods and it was agreed that the preferred approach, to use beam trawls and historic data, was appropriate.
	1.16. It has not been discussed or acknowledged the limitations associated with the site specific beam trawl and the EA TRaC (otter trawl) survey data. It should be noted that gear type affects catchability and therefore survey data may under or overestimate abundance, with some species potentially not appearing in the catch data. For example, a 2m beam trawl is suited to catching small and juvenile demersal fishes but will not adequately target larger fish or mid water and pelagic species. The seasonality of the surveys is also important to consider as survey data has only been provided for spring and autumn. The limitations and assumptions of the data presented should be acknowledged.	The limitations of the surveys undertaken have been addressed within Appendix 8-1: Marine Baseline Surveys (Volume 3) of the Environmental Statement. The method undertaken for the surveys was selected to ensure compliance with WFD methodology, which states that surveys should be bi-annual (spring and autumn) or annual. Survey timings were also restricted due to avoidance of sensitive fish periods (e.g. migration). Fish surveys within the Study Area were limited to subtidal benthic trawls due to health and safety issues. These included no safe access to the foreshore across the river wall to deploy fyke nets, and the substrate within the project area not being appropriate to deploy seine nets (extensive mudflats). Prior to conducting fish surveys, the project team consulted with the Environment Agency on the most appropriate methods and it was agreed that the preferred approach, to use beam trawls and historic data, was appropriate.
	1.17. Sensitive migratory periods for fish receptors that have been reported in the study area such as European smelt (Osmerus eperlanus), European eel (Anguila anguila) and Allis shad (Alosa alosa) have also not been identified. For the ES, the upstream/downstream migratory periods should be described or presented (for example in a table) for all the relevant migratory species in the Thames. This should be used to identify any overlap between the migratory periods and the construction schedule, so that potential impacts to these species of conservation importance can be appropriate assessed. The ZSL has a 'Guidance Document' (ZSL, 2016) which has been developed with planners and developers in mind and provides some useful information on key periods for Thames fish. This will allow an assessment of whether potential impacts associated with the construction of the project will coincide with sensitive migratory periods. If deemed necessary, specific works can then be scheduled so as not to coincide with these periods, reducing the potential impacts to migratory fish receptors.	Subsequent discussions with the Environment Agency have informed this ES assessment on suitable mitigation and which periods to avoid in line with other developments on the River Thames. This includes the avoidance of activities such as piling and dredging between April and September (The Site is not within 30km of any sensitive habitats including spawning locations) to avoid sensitive periods for migratory fish species and intertidal piling at low tide (where practicable).

	1.18. The MMO notes that potential impacts to fish identified for the construction and operational phases are appropriate and are as follows: • Loss or disturbance of habitat • Changes in water quality and release of contaminants • Noise and vibration • Lighting	No response required.
	1.19. Concerning loss of habitat as an impact in the ES, the MMO recommends that temporary loss of habitat and permanent loss of habitat are considered separately.	The assessment of temporary and permanent habitat loss is considered in section 8.8 of the Environmental Statement: Chapter 8: Marine Biodiversity.
	1.20. The assessment of some of the potential impacts lacks the detail that the MMO would have anticipated at the PEIR stage, especially with respect to underwater noise (UWN). The report states that an UWN study will be undertaken at the ES stage focussing on acoustically sensitive species such as herring. The MMO would have expected a preliminary UWN assessment to have been presented in the PEIR using appropriate modelled data and/or literature to support it. UWN generated during percussive piling operations has the potential to cause physiological harm and affect behaviour in fish. Fish responses to noise are in-part related to the anatomy of their hearing mechanisms. The presence of a swim bladder acts as a pressure transducer, converting sound pressure to particle velocity. Those species where the swim bladder is near to or connected to the ear have increased hearing sensitivity and thus greater vulnerability to underwater noise impacts (Popper et al., 2014). With this in mind, the MMO has outlined some points below for consideration which will help inform the UWN assessment for fish:	The underwater noise (UWN) assessment presented within this ES has been undertaken with consideration of the points the MMO has outlined. This assessment can be found in Appendix 6-4:Underwater Noise Assessment (Volume 3). The findings of the UWN assessment are considered in Section 8.8. The findings of the UWN Assessment concluded that effects on all receptors are negligible.
	i. Fish species with spawning or nursery grounds in the area, and those species that are known to migrate through the river Thames should be classified into one of four categories based on the hearing capabilities and presence/absence of a swim bladder – please refer to Popper et al. (2014) for further details.	
	ii. Please also refer to Popper et al. (2014) for sound exposure guidelines on noise thresholds for mortality, potential mortal injury and recoverable injury, temporary threshold shift (TTS) and behaviour responses for fish for impulsive noise (e.g., percussive piling) and continuous noise (e.g., vibropiling).	
	iii. The underwater noise assessment should be presented using appropriate unweighted metrics, supported by underwater noise modelling or by case studies of a similar nature to support conclusions made on the likelihood and significance of impacts to fish from piling.	
	iv. The modelled/predicted impact ranges for underwater noise should be discussed in the context of the width of the river Thames to determine the likelihood of an acoustic 'barrier' to fish movement and migration.	
	v. If concurrent/simultaneous piling activity is proposed, this should also be included in the modelling or considered when sourcing supporting case study information.	
	1.21. The timing of piling works should be provided, together with a description of the number and size of the piles, typical duration of installation (per pile), and the number of piles to be installed per day, so that any overlap in construction and dredging activities with the spawning and migratory periods of fish can be identified.	Details regarding piling are provided within Chapter 2: Site and Proposed Scheme Description (Volume 1) and with the consequent assessment presented in Appendix 6-4: Underwater Noise Assessment (Volume 3) of the Environmental Statement. The findings of the UWN Assessment concluded that effects on all receptors are negligible.
	1.22. Although a more complete assessment has been provided for the other impacts identified, these still lack depth, such as identifying which species are expected to be impacted the most and why. It should be stated which fish receptors are likely to be most vulnerable and why they are likely to exhibit sensitivity to the given impact. In addition, the MMO would expect each receptor group and their respective impacts to be broken down into different sections/ chapters (e.g., fish and shellfish, marine mammals etc) as this would reduce the potential for any confusion	Section 8.8 of the Environmental Statement presents the assessment of potential effects on each receptor group separately, within relevant sub-headings. Fish and marine mammals have been assessed individually for all impacts. Shellfish have not been considered within this chapter as the nearest shellfish bed is located approximately 39.6km downstream from the Site Boundary.
	1.23. The mitigation and compensatory measures suggested seem generally appropriate given the nature of the anticipated works. These include minimising the impacts of artificial light, carrying out construction activities such as piling and dredging outside sensitive periods for fish receptors and the use of lower noise techniques such as vibro-piling when possible. The sensitive periods for fish receptors have not been provided at this stage, however the MMO notes they will be established by consultation with the EA, Natural England and PLA. The MMO would have expected this information to already have been provided in the PEIR, however consultation with the relevant conservation bodies is an appropriate approach and the MMO wish to be included within this consultation. The use of 'soft start' piling techniques has also been suggested to allow sufficient time for fish receptors to move away from the impacted area. It should be ensured that these follow the JNCC guidelines (JNCC, 2010).	Consultation has been undertaken with the Environment Agency to agree main periods for fish migrations which should be avoided during the piling associated with the construction of the Proposed Scheme, further details are provided in Table 8-2and Section 8.7. These avoidance periods form part of the embedded mitigation for the Proposed Scheme.
	1.24. Given the large range of effect for UWN that is likely to occur during piling operations, the Zone of Influence used in the assessment of cumulative impacts for UWN will need to be increased based on the outcomes of the UWN modelling.	Cumulative impacts on marine ecology have been considered where relevant in this chapter and the impacts of different aspects of the Proposed Scheme to marine ecology have been considered in Chapter 8 of the Environmental Statemenet: Marine Biodiversity (Volume 1) (including consideration of underwater noise).
	1.25. The MMO notes that the report provides the methodology but not yet an intra-project cumulative assessment in the PEIR, as it is stated that this will be presented in the ES. The MMO would have expected at least a provisional cumulative assessment at the PEIR stage.	Cumulative impacts on marine ecology have been considered where relevant in this chapter and the impacts of different aspects of the Proposed Scheme to marine ecology have been considered in Chapter 8 of the Environmental Statement: Marine Biodiversity (Volume 1) (including consideration of underwater noise).
	Shellfisheries	N/A
	1.26. The MMO notes that impacts to shellfish have been scoped out, as per the below: *"Records from the desk study and results from the intertidal and subtidal benthic surveys state that shellfish of conservation and commercial importance are unlikely to be present within Study Area of the Proposed Scheme. Furthermore, the nearest Classified Bivalve Mollusc Harvesting Area and Shellfish Waters are located approximately 39.6km downstream of the Proposed Scheme. Therefore, potential impacts to shellfish are scoped out of further assessment".*	No response required.
	1.27. The scoping out of all shellfish receptors without apparent formal consultation of an advisor or stakeholder for shellfish (as is indicated by the Table of Scoping Opinion Responses in Chapter 8) raises concern. The MMO would expect to be presented with evidence of desk-based studies and results prior to the scoping out of shellfish. Additionally, capital dredging is proposed to be undertaken but no disposal method of the dredged material has been identified. Should a marine disposal site be used, shellfish would need to be scoped in and fully assessed for potential impacts, noting that the report states that a method of dredge disposal will be identified within the ES. As a minimum, the MMO would not expect to see shellfish scoped out until a full worst-case scenario methodology has been assessed and evidence to support the scoping out of shellfish species has been presented.	Records from the desk study and results from the intertidal and subtidal benthic surveys stating that shellfish of conservation and commercial importance are unlikely to be present within Study Area of the Proposed Scheme. Furthermore, the nearest Classified Bivalve Mollusc Harvesting Area and Shellfish Waters are located approximately 39.6km downstream of the Proposed Scheme. The sediment plume modelling determined that increased levels of suspended solids would be generated at a distance of up to 3.5km from the works area, thus there will be no direct impacts from dredging. Therefore, potential impacts on shellfish are scoped out of further assessment. Furthermore, the dredged arisings associated with the Proposed Scheme (during both capital dredging and maintenance dredging) will be managed in accordance with relevant legislation and will be disposed of offsite (via vessel and only if dredged arisings are deemed suitable for this disposal method and conform with the permits for disposal sites). The removal of the dredged arisings will be undertaken by an appropriately licenced waste carrier, thus not impacting shellfish waters.
	1.28. In not presenting evidence to support the scoping out of shellfish species, the report does not detail the species assessed for scoping out. The MMO would expect to see a list of shellfish species considered as part of the decision-making process for scoping the receptor out	
	Underwater Noise	N/A

	1.29. The MMO does not have any major concerns regarding the matters or receptors that have been scoped out in relation to UWN.	No response required.
	Construction Phase: 1.30. It is appropriate that underwater noise and vibration during the construction phase has been scoped in for fish, marine mammals, the Medway Estuary (fish) and the river Thames and its Tidal Tributaries (fish). The primary noise generating activities that will need to be considered will be piling and dredging activities, as well as the potential demolition of the Belvedere Power Station Jetty (disused). If the Belvedere Power Station Jetty is retained, there will be no noise or vibration impacts in relation to this jetty.	No response required.
	1.31. The MMO notes in Section 2.4.22 that there may be several vessel movements to and from the Proposed Jetty zone per day during the construction phase. The number of vessel movements will depend on the construction activities being undertaken at that point in time. The vessels will berth alongside the jack-up barge which will be located in close proximity to the construction activities being undertaken, moving with the Proposed Jetty zone as appropriate.	Noted
	Operational Phase: 1.32. It is also appropriate that underwater noise and vibration during the operational phase has been scoped in for fish, marine mammals, the Medway Estuary (fish) and the river Thames and its Tidal Tributaries (fish). Maintenance dredging and operational vessel movements will need to be considered. As per section 2.6.18, based on a preliminary operational capacity assessment, up to five marine vessels will call at the Proposed Jetty each week.	Noted
	Receptors: 1.33. No specific receptors have been scoped out as such. A detailed baseline description is provided in Chapter 8. Of note, the report identified that the grey seal and harbour seal are commonly observed foraging in the Beley and Greenwich area of the river Thames. Harbour porpoise have also been observed in the vicinity of the Site. The Thames Estuary supports diverse fish fauna, including demersal, pelagic, and migratory species. Migratory species include European smelt, Atlantic salmon, Brown trout, Twaite shad, lamprey and European eel.	No response required.
	1.34. An assessment of the potential underwater noise impacts on marine receptors is limited at this stage. The PEIR confirms that noise levels and their effects on fish and marine mammals will be determined as the design progresses. An underwater noise study will be undertaken to support the marine biodiversity assessment that will be subsequently assessed in the ES chapter. This will be undertaken for fish of Regional/County to National importance (including hearing specialist species such as herring); and marine mammals of National importance (i.e., common seal, grey seal and harbour porpoise). The MMO supports this approach.	No response required.
	1.35. The PEIR appropriately identified that the potential effects on marine ecological receptors, depending on the magnitude of the impact, can range from behavioural changes, injury, hearing loss, stress, difficulty in feeding, changes in predator/prey relations, mate disruption, stranding and mortality. At the very minimum, the MMO would expect the ES to consider the potential risk of auditory injury and disturbance/displacement in marine receptors, especially the risk of an acoustic barrier across the river (which may impact migratory species that utilise the river in particular).	The chapter has considered a range of effects upon receptors, including behavioural changes, reductions in reproductive success and mortality against all the potential impact pathways. In addition, the underwater noise (UWN) assessment has been undertaken in order to address the points the MMO has outlined. This assessment can be found in Appendix 6-4: Underwater Noise Assessment (Volume 3). The findings of the UWN assessment are considered in Section 8.8. The findings of the UWN Assessment concluded that effects on all receptors are negligible.
	1.36. Details of the underwater noise assessment and modelling should be transparent and clearly presented in the ES. The MMO recommends applying noise exposure criteria from Popper et al. (2014) for fish species, and criteria from NMFS (2018) or Southall et al. (2019) for marine mammal species. Consideration should also be given to the timings and duration of each activity, and any potential overlap with sensitive (i.e., spawning or migration) periods.	Further detail regarding noise exposure criteria is provided within Appendix 6-4 of the Environmental Statement: Underwater Noise Assessment (Volume 3).
	1.37. For operational noise, the PEIR concludes that for maintenance dredging activities, "a negligible magnitude of impact is likely. Therefore, there is likely to be a direct, temporary, long term (intermittent) and negligible, effect on fish and marine mammals (not significant)". The MMO would expect dredging to be further considered in the ES, with information on the proposed duration and timings of work.	Further detail regarding the potential effects of noise from maintenance dredging activities is provided in Section 8.8 of Chapter 8 of the Environmtenal Statement. .
	1.38. The MMO will be better informed to comment on the proposed mitigation at the ES stage once an underwater noise assessment has been undertaken. However, we note that Section 8.8.27 identifies appropriate mitigation options to consider such as:	The mitigation stated in the MMO comment is included in Section 8.7 of the ES.
	i. The use of soft start piling to allow sufficient time for sensitive marine receptors to move away. Soft start measures may help to reduce the total number of dangerous exposures in terms of auditory injury.	
	ii. Employing a marine mammal observer to ensure the area is clear of marine mammals prior to the commencement of percussive piling activities and to cease piling activities if a marine mammal moves into the works area.	
	iii. Undertaking percussive piling and potentially other noisy activities outside of the key sensitive period for fish (e.g., migratory period). This will be discussed and agreed with the Environment Agency, Natural England and the Port of London Authority (PLA) prior to the commencement of any construction works	
	1.39. The MMO notes that Section 8.7.3 also identified appropriate measures which will be identified in the ES, including:	The mitigation stated in the MMO comments is included in Section 8.7 of the ES.
	i. [As above], Any construction activity that may cause direct disturbance to the marine environment (such as piling) should not commence unless an Ecological Clerk of Works (ECoW) is present. This is to ensure sensitive species, notably marine mammals, are absent from the area.	
	ii. [As above], Construction activities such as piling, and capital dredging should occur outside of sensitive periods for sensitive fish species identified within this chapter. This includes migration, spawning and nursery periods and should be clearly stated in the Outline Code of Construction Practice (OCoCP). The most appropriate timing will be agreed with the regulatory bodies.	
	iii. Where practicable, low noise piling techniques (pile press in technology) or vibro-piling will be used to minimise the impact on fish and marine mammals. If this is not feasible, the ES will set out justification for any use of percussive piling methods.	
	iv. Maintenance dredging should occur outside of sensitive periods for sensitive fish species. This includes migration, spawning and nursery periods and will be clearly stated in the OCoCP.	
	1.40. In summary, all relevant impacts (i.e., noisy activities such as piling and dredging) during the construction and operational phase have been identified in the PEIR in relation to UWN. However, an assessment of the potential underwater noise impacts on marine receptors is limited at this stage. The PEIR confirms that an underwater noise study for fish and marine mammal species will be undertaken for the ES. The MMO would expect the ES to consider the potential risk of auditory injury and disturbance/ displacement in marine receptors, especially the risk of an acoustic barrier across the river (which may impact migratory species that utilise the river in particular). Details of the underwater noise assessment modelling should be transparent and clearly presented in the ES.	A detailed assessment of noise and vibration impacts on sensitive receptors is included within Section 8.8 of the ES. This chapter (Marine Biodiversity) considers potential impacts to fish and marine mammals, including; injury, displacement, temporary barriers to migration and modifications to behaviour.
	2.1. The PEIR correctly identifies that the proposed development is within the South East Inshore Marine Plan Area and the MMO welcomes the developer's commitment to including consideration of the plan in the ES. A marine plan conformance assessment must be produced as the Secretary of State must use the South East Inshore Marine Plan when making planning decisions for the sea, coast, estuaries and tidal waters, as well as developments that impacts these areas, such as infrastructure.	The Applicant's response to this comment can be found in the Poilcy Accordance Tracker (Document Reference 5.3).

National Grid	Please also refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd'	No response required.
	These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.	No response required.
	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	The Applicant understands that the only NGET assets within the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	The following points should be taken into consideration.	N/A
	• National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004).	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
	• Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	The Applicant understands that the only NGET assets in the Order limits are redundant and therefore do not require any protective measures or protective provisions in the DCO
National Highways	We have reviewed the PEIR (Preliminary Environmental Impact Report) available for this proposal at the website link provided for this carbon capture/waste management site which will be an extension of an existing facility situated off the A2016 in Belvedere adjacent to the Thames . This is approx. 6 miles from the strategic road network (SRN) A2/M25 J2 and 6.5 miles from the SRN at the next junction at the A206/A282/M25 J1A. I note that the study area for traffic impacts does not cover the SRN but the study area has been agreed with the local highway authorities only.	No response required.
	It appears that the operational impact of the site on the SRN will be in the order of 78 two-way daily vehicular movements. However, the construction impact could potentially be more substantial at peak, up to 576 two way daily HGV trips at peak based on other similar sized construction projects. Of these, up to 75% could be coming to/from the M25, although we note that this is only indicative at this stage and a full assessment hasn't yet been carried out. There is also potential for up to 1154 two way construction workforce trips, but there is even less information on the distribution of these trips available, and at this stage the assessment appears to be only indicative and only covers the immediate vicinity.	No response required.
	You will be producing a full Transport Assessment and full Environmental Statement at the next stage, but given the numbers of potential trips on the SRN during the construction phase, I suggest a discussion to better understand the plans for construction phasing and timings, and the potential for further assessment of the impacts on the SRN, would be beneficial to yourselves and to National Highways. I would also like to talk about possible measures that could be committed to prior to start of works to reduce the construction impacts, i.e. managing delivery and shift timings during construction. For now, we don't have information on project timings to understand when, in the programme, the jetty works would be done and how much of the construction materials would then come to site via the river rather than by road.	A Framework CTMP (Document Reference 7.7) has been prepared which sets out potential measures (including delivery schedules, designated routes and site signage) to mitigate construction effects. A full CTMP(s) will be developed post-determination in substantial accordance with the Framework CTMP (Document Reference 7.7), pursuant to a requirement in the Draft DCO (Document Reference 3.1).
	It has not been practical for myself, or my team to attend the open consultation sessions but I'd like to have an early opportunity to meet with your Team to gain a better understanding of potential SRN impacts.	Table 2-3 and Table 2-4 of Chapter 2: Site and Proposed Scheme Description (Volume 1) indicate the preliminary construction programme for the Proposed Scheme. As explained in Section 2.4 of Chapter 2: Site and Proposed Scheme Description (Volume 1) for the landside elements of the Proposed Scheme construction transport will primarily be roadbased. It is not practicable to use Middleton Jetty for the delivery of construction plant and materials for the landside elements of the Proposed Scheme without compromising the effectiveness of the operations at Riverside 1 and Riverside 2 (once operational). Construction transport for the Proposed Jetty (i.e. steel piles, precast concrete units and marine equipment such as fenders) is anticipated to be primarily via the River Thames. The Proposed Jetty would not have the required capacity to accommodate the construction of the Proposed Scheme. In addition, its lightweight structure is less suited for bringing in construction materials. To utilise landside transport for the construction of the Proposed Scheme will not result in significant effects on the local road network, as set out in this chapter. In order to assess a worst case scenario, it has been assumed that all construction transport will be road-based.
Port of London Authority (PLA)	The PLA notes that the redline boundary for the proposed development is still very broad at this stage, extending across the River Thames to the borough boundary line between the London Boroughs of Bexley, Barking and Dagenham and the Royal Borough of Greenwich. It will need to be made clear as the scheme develops the extent of the actual works affecting the Thames and how far into the Thames the proposed temporary works will encroach.	The nature and extent of the works are shown on the Works Plans (Document Reference 2.3), and further explanatory detail is provided in Chapter 2: Site and Proposed Scheme Description (Volume 1). The incorporate space for the Proposed Jetty, modification of removal of the Belvedere Power Station Jetty (disused), associated dredging, and associated working space.
	With regard to Table 8-2 (Summary of the EIA Scoping Opinion in Relation to Marine Biodiversity), to highlight that although it is considered that the Medway Estuary MCZ is unlikely to affected by the proposals because of the distance and lack of hydrological connection to the site. There is no mentioned of the Swanscombe MCZ, which is hydrologically connected to the site. Section 3.4.2 states that the Planning Inspectorate agrees to rule out effects on nationally designated sites apart from Medway Estuary MCZ and this potential discrepancy needs to be addressed with regard to including consideration the Swanscombe MCZ.	Within the EIA Scoping Opinion27 (Section ID 3.4.2), the Planning Inspectorate agreed to all MCZ being scoped out of further assessment with the exception of the Medway Estuary MCZ, which has been included within the assessment presented in Section 8.8of this chapter. The scoped out MCZ are not designated for mobile aquatic features such as migratory fish or marine mammals, and are located at some distance from the Site. In addition, the Swanscombe MCZ was scoped out of the assessment, due to its distance from the Site Boundary (11km downstream) and a lack of mobile receptors (such as European smelt) that have the potential to utilise the area as part of their lifecycle.

	The PEIR report in a number of places refers to UKBAP habitats, related to this it is considered that as part of the Environmental Statement (ES) that it may be more appropriate to instead refer to these as Habitats of Principal Importance (section 41 habitats under NERC 2006) as these are underpinned by legislation rather than the action plan. In addition, further justification will be required as part of the forthcoming ES on why the priority habitats are currently only considered of only of regional/county importance and not considered of greater importance.	The Habitats of Principal Importance have been considered as High importance, as described in Table 8-7 of Chapter 8: Marine Biodiversity of the ES. Intertidal mudflat and saltmarsh have been amended to be assessed as of National importance.
	The applicant must also confirm whether the intertidal zone will be included in the terrestrial or marine biodiversity chapters of the forthcoming ES, given the area is in an estuarine environment where the two are inextricably linked.	The intertidal zone of the River Thames is included in the assessment presented in Section 8.8 of Chapter 8: Marine Biodiveristy of the ES.
	As part of table 14-2 (Summary of the EIA Scoping Opinion in relation to Population, Health and Land Use) page 14-19, to highlight that no additional moorings have so far been assessed as part of ongoing Navigational Risk Assessment (NRA) discussions between the PLA and the applicant.	Noted.
	As noted within the PEIR, as the ES is developed further information on the use of the River Thames for the transportation of construction and waste materials will be presented in Chapter 2 (Site and Proposed Scheme Description) of the ES. The PLA would support the full investigation within the ES of how the river can be utilised as part of the construction stage, noting the need to continue to safely operate the adjacent facility at Middleton Jetty.	The use of the River Thames for transportation of construction and waste materials is discussed in Section 2.4 of Chapter 2: Site and Proposed Scheme Description (Volume 1). A breakdown of the indicative construction programme is provided in Chapter 2: Site and Proposed Scheme Description (Volume 1). Optionality remains over whether Option 1 (60 months) or Option 2 (42 months) will be selected for construction to allow for flexibility post-DCO submission. This means the construction of the Proposed Jetty will potentially begin either in Q3 2026 for Option 1 or Q1 in 2027 (Option 2). It is not practicable to bring the construction of the Proposed Jetty forward because waiting for the Proposed Jetty to be available would delay the programme of construction by 18 months and result in CO2 emissions continuing for an additional period of time before the Carbon Capture Plant becomes available. The Proposed Jetty would not have the required capacity to accommodate the construction of the Proposed Scheme; its lightweight structure is less suited for bringing in construction materials. The utilisation of landside transport for the construction of the Proposed Scheme will not result in significant effects on the local road network, as set out in Chapter 18: Landside Transport (Volume 1). Options will be explored at detailed design stage with input from the Contractor(s). This will require knowledge of the supply chain and conflict with existing operations at the Site.
	Under section 19.7 (Embedded Design, Mitigation and Enhancement measures) point 3 of paragraph 19.7.3 states that the Proposed Jetty has been positioned within the channel such that a minimal volume of dredging is required, whilst ensuring safe navigation for Proposed Scheme vessels berthing at the Proposed Jetty, and third-party vessels transiting along the navigation channel. This has not yet been agreed within the Preliminary Navigational Risk Assessment (pNRA) and there are ongoing assessments and discussions for the pNRA which will determine whether the proposed jetty location is acceptable.	Appendix 19-1 of the Environmental Statement: Preliminary Navigational Risk Assessment (Volume 3) is based on the Proposed Jetty described in Chapter 2: Site and Proposed Scheme Description (Volume 1). The Applicant, as demonstrated in Table 19-2 of Chapter 19: Marine Navigation (Volume 1) has continued with consultation and engagement to support of the preparation of the marine navigation assessment and Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3).
	Furthermore point 6 of paragraph 19.7.3 states that ship bridge simulations have confirmed that no significant ship handling issues were identified, and sight lines were not felt to be an issue. As part of the simulations there was a period of the tide where manoeuvres off the berth would not be acceptable to PLA Pilots and as such would be included as limitations of operational use. This must be highlighted as part of the Preliminary Navigation Hazard Analysis.	The PLA pilots were concerned about a mid-ebb tide departure. This scenario was simulated in order to consider the worst case scenario. However, the vessels will be required to depart the Proposed Jetty no later than High Water +1.5 hrs to avoid compromising Under Keel Clearance further down the River Thames, therefore a mid-ebb tide departure is highly unlikely to occur, and could be made a limitation of operational use. See Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3).
	Section 19.9 (Additional design, mitigation and enhancement measures) in paragraph 19.9.3 includes a proposal that the Proposed Jetty will be able to facilitate the berthing of Riverside 1 and Riverside 2 tugs via a landing pontoon that will be located at the rear of the Proposed Jetty so as not to interfere with vessel movements on the LCO2 export operations. To confirm this proposal has not been discussed with the PLA and does not currently form part of the NRA.	As described in Chapter 2: Site and Proposed Scheme Description (Volume 1) it is proposed that berthing facilities for Cory tugs operating at the Middleton Jetty are integrated to the Proposed Jetty. The berthing of Cory tugs will be facilitated via a landing pontoon which will be located at the rear of the Proposed Jetty. As well as providing berthing facilities, the pontoon will provide a means of increased safety during operations at both the Proposed Jetty and Middleton Jetty. Details of this can be found in Section 2.2 of Chapter 2: Site and Proposed Scheme Description (Volume 1). Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3) is based on the Proposed Jetty described in Chapter2: Site and Proposed Scheme Description (Volume 1). Information on the proposal to facilitate the berthing of Riverside 1 and Riverside 2 tugs via a landing pontoon on the Proposed Jetty is outlined in Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3).
	Noted that paragraph 19.9.5 states that the installation of a navigation mark in line with the Proposed Jetty and to the north of the authorised channel will be considered to indicate the boundary of navigable water available during swinging. To confirm it has not yet been established between the PLA and the applicant if this is required or if such a mark would be suitable/possible in this location.	Further engagement with the PLA was held during January/February 2024 on this point. This has since been removed from Appendix 19-1 of the Environmental Statement: Preliminary Navigational Risk Assessment (Volume 3).
	With regard to section 19.10 on monitoring, to confirm the PLA would expect monitoring to be ongoing throughout construction when the risks are different to the operational phase. For the operational phase it is expected that the proposed jetty would be suitably navigationally risk assessed prior to any construction.	Monitoring during the construction phase is part of the Proposed Scheme to ensure safety on the River Thames. The proposed monitoring is detailed in Section 19.10 and in the pNRA and secured by the DCO requiring compliance with the pNRA. With regard to monitoring during the operation phase, a suitable NRA would be produced, in accordance with Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3) before operational activities are undertaken.
	Welcome paragraph 19.9.2 which states that as part of the pNRA and the construction phase of the development, it is anticipated that the maximum extent of marine plant would be assessed and agreed, and that additional measures would be recommended, which might include (but are not limited to) operational limits, deconfliction of vessel movements, abort points and contingency anchorages, a dedicated safety vessel, appropriate site lighting, promulgation of Notice to Mariners, detailed passage plans, and additional safety moorings to prevent breakout of marine plant.	No response required.
	Within the associated consultation brochure, which on page 13 seeks views on the future of the disused Belvedere Power Station Jetty located within the red line boundary. Items to considered if the structure were to remain include: • Ongoing maintenance and repair requirements of the structure. If the applicant was to take ownership of the structure from the existing owner, then a plan would be required and made available to the PLA to show the structure will be prevented from becoming a hazard to the river. • Future use. If the applicant proposes to keep the structure and find a marine based use for it, the interaction between the structure with the new proposed jetty will need to be considered as part of the NRA process currently ongoing in order to assess any proposals at an early stage.	Chapter 2: Site and Proposed Scheme Description (Volume 1) of the ES outlines the technical requirements for the retention of the Belvedere Power Station Jetty (disused). The Belvedere Power Station Jetty (disused) Technical Note (appended to the Jetty Site Alternatives Report (Document Reference 7.6)) sets out further measures for the potential preservation of the structure as well as any consideration for constraints posed by marine navigation. The Applicant's proposals for the jetty will ultimately be able to involve the PLA pursuant to the Protective Provisions for their benefit in the Draft DCO (Document Reference 3.1).
Royal Mail	Royal Mail and its advisor BNP Paribas Real Estate have reviewed the PEIR and other section 42 consultation material.	Noted
	Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.	Noted
	Abbey Wood Delivery Office is approximately 1 mile away from the site of the Cory Decarbonisation Scheme. Rainham Delivery Office is approximately 1.25 miles north-east.	Noted
	There are a number of other operational Royal Mail Properties in the area surrounding the scheme as shown in red font on the plan below:	Noted
	Every day, in exercising its statutory duties Royal Mail vehicles use all of the roads that may potentially be affected by the proposed Cory Decarbonisation Project construction works.	Chapter 18 of the Envrionmental Statement and Appendix 18-1: Transport Assessment (Volume 3) provide a robust assessment of the effects of the construction and operation phases of the Proposed Scheme on the surrounding transport networks. No significant effects are anticipated as a result of the Proposed Scheme to the local highway network.
	Any periods of road disruption / closure, night or day, on or to the roads immediately connected to the Cory Decarbonisation Project or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.	
	Royal Mail does not wish to stop or delay the Cory Decarbonisation Project from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public from and to the above identified operational facilities in accordance with its statutory obligations.	

	Due to insufficient information presently being available by which to assess the level of potential risk to its operations and any proposed mitigations for such risk, at this point in time Royal Mail is not able to provide a full consultation response.	Noted
	Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s later in the DCO consenting process when sufficient information is available. Royal Mail also wishes to reserve its position to submit representations to the future Public Examination, if required.	Noted
Seamus Gannon	Our client objects to the matter going forward in the way outlined in your letter of 18th october and objects to the compulsory purchase of his land. We, together with solicitors fo Creekside Development (Kent) Limited have taken advice from Melissa Murphy KC of Landmark Chambers with regard to the matter as and when further information is available to us.	Noted
	By way of background, our client originally purchased this property with a view to relocating one of his businesses to it and was then forced to grant a Lease of the land to The Cory group. His intention however is that the land should eventually be used for the purpose of carrying on one of the Gannon family's businesses.	Cory is and remains willing to discuss the shape of any land agreement. However, Cory's initial view is that the Proposed Scheme has a planned design life of at least 25 years (excluding a circa 5 year construction period), and this has the potential to increase with the implementation of an effective maintenance strategy for the Proposed Scheme's equipment and assets.
	The objections that we wish to raise can be summarised as follows:	N/A
	1. The Section 35 Direction is based on a materially out of date description of the project and that, as dar as my clients can tell, Cory seems not to have followed the Secretary of State's advice to seek confirmation that the Project and development that is the subject of the proposed application is the same as that for which the Direction was given.	The Section 35 Direction as made by the SoS, confirms that the Proposed Scheme should be treated as development for which development consent is required and therefore is defined as a Project of National Significance (PNS). The SoS noted that the "Proposed Project relates to the construction of post combustion carbon capture, storage, and transfer equipment; and the construction of hydrogen facilities and thus sits within one of qualifying infrastructure fields listed in section 35(2)(a)(i) – energy - of the Planning Act". The SoS highlighted that one of the reasons that the Proposed Scheme should be considered as a PNS is that: "The carbon capture element of the Proposed Project would provide and support the decarbonisation of energy from waste derived CO2 emissions in the UK, delivering over a million tonnes of CO2 savings per annum, and supporting the achievement of a fully de-carbonised district heating network that crosses local authority areas".
	2. Counsel has advised that the changes in description of the project between the letter to Mr Gannon of 15th February 2023 and the letter of 18th October 2023 are quite significant and she does not understand why the Project will fall to be treated as an Nationally Significant Infrastructure Project ("NSIP") and thus come within the Planning Act 2008 DCO regime. Counsel jas conducted some investigation and has looked at some additional published information from Cory with regard to the Project, namely the Preliminary Environmental Information Report "PEIR" in that this is the most obvious source of more detailed information than was contained in the letters. We felt that understanding more about the Project was important.	Cory recognises that the Project is not an NSIP, and that this was an error on the section 42 letter. All other consultation materials (including the PEIR) correctly note that the project is a 'Project of National Significance' that has been brought into the Planning Act 2008 regime by the Section 35 Direction.
	The PEIR:	N/A
	a. Contains a more detailed scheme description than in the letters, see paragraph 1.1.5. It explains the intended links with the Riverside 1 and 2 facilities and the overall intended carbon dioxide capture.	No response required
	b. Paragraph 1.1.10 confirms that the Hydrogen Project element of the scheme (and in fact also a battery energy storage system) are no longer part of the project. The decision not to proceed with those elements was "made on commercial grounds".	No response required
	c. Importantly, paragraph 1.2.1 details the direction made by the Secretary of State that the project should be treated as an NSIP and should therefore follow the DCO process. There are two points on this. First, the decision to make a Section 35 direction seems to have been taken when the project had the additional Hydrogen Project element (see also paragraph 1.2.2); and	A letter from SoS on 28th February 2024 confirmed the Proposed Scheme remains considered as a PNS.
	i. Secondly, the authors of the PEIR and indeed the correspondence have treated the s.35 direction as making the project "an NSIP". See, e.g. 1.2.1 and the letter of the 18th October 2023. This is contrary to case law, which establishes that such directions by the Secretary of State determine the process to be followed, but do not turn a project which is not an NSIP under the Planning Act 2008 into that kind of project. This matters, because the decision making approach for different kinds of projects under the Act differs depending on whether or not the project is an NSIP. If it is, a decision is taken "in accordance with" any relevant policy statement. In practise this leads to a constrained decision making process. By contrast, if the decision is taken pursuant to section 105 of the Planning Act (i.e. broadly, the project goes through the DCO process but is not an NSIP), the obligation is to "have regard" to any relevant national policy statement, plus a range of other considerations. This may seem rather legalistic, but in practice it can be very important. That is particularly where, as here, there are local policy designations which in the latter case (s.105) may well prove important and relevant issues (e.g. Metropolitan Open Land), but which would not have the same import if the decision is taken under s.104.	By way of letter dated 6th October 2022, the Secretary of State (SoS) made a Direction, under Section 35(1) of the Planning Act 2008 (as amended) (PA2008), that the Proposed Scheme should be treated as development for which development consent under the PA2008 is required and therefore a Project of National Significance (PNS). A letter from SoS on 28th February 2024 confirmed the Proposed Scheme reamins considered as a PNS.
	d. On a related point, there is some acknowledgment of the relevant case law in paragraphs 1.5.1 and 1.5.2, but it assumes that there will be text in the applicable National Policy Statement (EN-1) which (when designated) would affect whether the development is assessed pursuant to section 104 or 105 of the Planning Act 2008. We would query whether ultimately that will be the case and, if such text is included, whether that would be true legal effect. This is again significant although perhaps it may appear a highly technical point: its potential utility us ramping up potential litigation risk for the project promoter. As had been noted, these seemingly legalistic points in this context are in practice very important.	Under section 104(3) of the PA2008, the SoS must decide applications for NSIPs in accordance with the relevant NPSs; in this instance, the relevant NPS is the Overarching NPS for Energy (EN-1) designated in January 2024 by the Department for Energy Security and Net Zero (DESNZ).

	e. In terms of the operational life of the plant (section 2.7), a design life of 25 years is given, but the PEIR assumes "a reasonable worst case scenario" of 50 years. After that, there may be some "residual life" remaining and an investment decision would be made.	The Proposed Scheme is intended to operate for at least 25 years. However, for the purpose of assessing a reasonable worst case scenario it is anticipated that it could have a design life of 50 years, as per typical design life of the civil and structural elements of the Proposed Scheme. At the end of the 50 year period, the Proposed Scheme may have some residual life remaining, and an investment decision will be made as to whether the operational life of the Proposed Scheme is to be extended. If it is not appropriate to continue operation, the plant will be decommissioned. Further information can be found in Chapter 2: Site and Proposed Scheme Description (Volume 1).
	3. Assuming the availability of the DCO process, a decision on the project should be taken under Section 105 of the Planning Act 2008, as matters stand, and notwithstanding the formulation of EN-1 as ultimately designated.	The PEIR correctly reflects the position in respect of section 104/section 105 of the Planning Act 2008 and projects brought into the regime at the time that it was written. Since it was written, the new National Policy Statements (NPS) have been published and were designated on 17 January 2024. The new NPS EN-1 makes clear that it and the relevant technology specific NPSs apply to section 35 projects. As such there is no doubt that section 104 will apply. Furthermore, the Proposed Scheme is considered a project of 'Critical National Priority' as defined by that NPS.
	4. The land is constrained, including by its Metropolitan Open Land designation, but there are also a range of nature conservation interests to take into account in addition. These tend to militate against the proposed project.	Cory acknowledges the environmental / ecological sensitivity in the surrounding area, which is why it has sought to locate much of the Proposed Scheme as is possible, balancing all factors, on land that is not subject to ecological designations, whilst also taking account of the existence of the reality of those and the Metropolitan Open Land (MOL) designation 'on the ground', in particular noting that some of the Crossness Local Nature Reserve (Crossness LNR) and MOL relates to land that is not publicly accessible. A Site Alternative Report (SAR) will be available to view as part of Cory's DCO application with further information in this regard.
	5. Re ecological/ biodiversity effects – it is not clear (but seems to be the case) that the proposal includes development on land identified as an area for ecological mitigation for Riverside 2 (paragraph 7.6.10). This seems undesirable, because the project then needs to address that impact.	Restoration of Open Mosaic Habitat was included as a commitment within the Riverside 2 development, and this restoration will not be possible as a result of the Proposed Scheme. However, the baseline for the Proposed Scheme includes Open Mosaic Habitat as if restoration had occurred, and thus has been included in the assessment of impacts and effects. Its loss will be offset through creation of Open Mosaic Habitat likely at the BNG Opportunity Area as proposed in the Outline LaBARDS (Document Reference 7.9). Thus, impacts on Open Mosaic Habitat, and habitats that would have been restored with Riverside 2, have been addressed in this assessment.
	6. That there seems not be a compelling case in the public interest for the compulsory acquisition of the two land interests (as required by Section 122(3) of the Planning Act 2008), not least because:	The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the development zone, including consideration of how the site should be aggregated or disaggregated.Chapter 2: Site and Proposed Scheme Description (Volume 1) makes clear that land used for the core Temporary Construction Compound will be utilised as part of the Carbon Capture Facility (for the Supporting Plant, as shown on the Works Plans (Document Reference 2.3)) upon completion of construction.
	i. There are alternative areas on which the development/ construction compounds/ ecological mitigation works could be delivered (and the proposals look to develop habitat created as part of the Riverside 2 scheme, which is undesirable);	
	ii. It is not clear whether there has been proper disaggregation of the elements of the proposed development in considering alternatives; and	
	iii. As matters stand, there is no proper justification for permanent rather than temporary acquisition of our client's land, particularly given the availability of alternative layouts/ disaggregation of the proposals.	
	7. If my clients land is really required, it should be by way of a Lease for a defined period rather than by the acquisition of the freehold.	Cory is and remains willing to discuss the nature of any land agreement. However, Cory's initial view is that the Proposed Scheme has a planned design life of at least 25 years (excluding a circa 5 year construction period), and this has the potential to increase with the implementation of an effective maintenance strategy for the Proposed Scheme's equipment and assets.
	8. From information our clients surveyors hold from the Climate Council website it appears that a number of decarbonisation projects elsewhere have failed and the technology seems to unrel`iable.	This technology has been available for a number of years albeit less prevalently in the energy from waste industry, but with its application to the energy from waste industry bringing a climate policy critical advantage of delivering negative carbon emissions. Furthermore, carbon capture is a key plank of the Government's Net Zero Strategy, Carbon Budget Delivery Plan, and in December 2023 this was re-emphasised by the publishing of its CCS Vision, and the recognition in the latest NPS EN-1 of such infrastructure being of critical national priority. The DCO application is intended to be submitted in March 2024, and we would welcome further discussion with you on the matters raised in your letter dated 24 November 2023, and in relation to land matters, and look forward to further discussions in the coming months.
	9. It would be appreciated if Cory could deal with the matter in future with rather more candour than they have in the past as full information does not appear to have been disclosed as early as it might have been.	Cory values its long standing relationship with Mr Gannon and has always conducted engagement in an open, honest and timely manner. It is committed to continuing in this approach as the Proposed Scheme develops.
Sevenoaks District Council	Having reviewed your consultation portal, we do not wish to make comment at this stage.	Noted
TfL	It is disappointing that construction of landside facilities will not be supplied from the river, consideration of which is required by London Plan Policy T7. We believe that a development with a riverside frontage and its own industrial pier, already used for transporting building materials (export of bottom ash), should be ideally placed for import of at least some construction materials. If not better addressed in the submission, this is something we would hope to explore at the examination. For road traffic, we await the results of the modelling which will be reported in the application. We would expect strong mitigation measures, including a undertaking to not schedule arrivals or departures which would involve travel on roads during the network peak periods, and to maximise opportunities for consolidation and back-loading.	As explained in Section 2.4 of Chapter 2: Site and Proposed Scheme Description (Volume 1) for the landside elements of the Proposed Scheme construction transport will primarily be roadbased. It is not practicable to use Middleton Jetty for the delivery of construction plant and materials for the landside elements of the Proposed Scheme without compromising the effectiveness of the operations at Riverside 1 and Riverside 2 (once operational). Construction transport for the Proposed Jetty (i.e. steel piles, precast concrete units and marine equipment such as fenders) is anticipated to be primarily via the River Thames. The Proposed Jetty would not have the required capacity to accommodate the construction of the Proposed Scheme. In addition, its lightweight structure is less suited for bringing in construction materials. To utilise landside transport for the construction of the Proposed Scheme will not result in significant effects on the local road network, as set out in this chapter. In order to assess a worst case scenario it has been assumed that all construction transport will be road-based.
	Use of the Census journey-to-work data is not necessarily relevant here, particularly as it exemplifies a "predict-and-provide" approach rather than the now-established industry practice of "decide-and-provide". In this respect, we would expect application of London Plan principles around commuter car parking (Policy T6 and T6.2, making appropriate adjustments for industrial sites as is clear in the policy and supporting text) and targets for sustainable travel set out in Policy T1. We would welcome detailed discussion over the assessment of impacts on existing bus services and the potential for enhancements to public services to support workforce travel. The Construction Workforce Travel Plan must contain strong measures to discourage single-occupancy private vehicles and to encourage more sustainable and active travel modes.	The methodology used to distribute and assign the construction workforce trips replicates that which was used within the Riverside 2 Transport Assessment which was developed with input and approval from the local highways authorities. The London Plan principles have been adopted (where applicable and appropriate) throughout the design of the Proposed Scheme – see Chapter 2: Site and Proposed Scheme Description (Volume 1). An assessment of the effects on the existing bus services has been undertaken within Appendix 18-1: Transport Assessment (Volume 3) and enhancements are not considered necessary. A Framework CTMP (Document Reference 7.7) has been prepared which sets out potential measures (including a CWTP) to mitigate construction effects. A full CTMP(s) will be developed post-determination in accordance with the Framework CTMP (Document Reference 7.7), pursuant to a requirement in the Draft DCO (Document Reference 3.1).

	While we acknowledge that the operational transport impacts are relatively modest, we are naturally concerned about the cumulative impact alongside existing and other new development in the area. Again, we would seek application of London Plan principles to issues such as provision of commuter parking places (Policies T6 and T6.2) and provision of measures to support active and sustainable travel (particularly Policies T2 and T5), and expect strong and effective measures within the workforce travel plan and other relevant mitigation (Policy T4). Note that the GLA is expected to comment on application of and compliance with other (non-transport) London Plan policies.	The assessment of the Proposed Scheme has taken into consideration cumulative effects – background traffic growth associated with allocated sites within Local Plans using growth factors obtained from the Trip End Model Presentation Program (TEMPro) v7.2 – adjusted to the National Transport Model (NTM) dataset AF15 – and traffic flows associated with the key committed development, that is Riverside 2. The London Plan principles havebeen adopted (where applicable and appropriate) throughout the design of the Proposed Scheme – see Chapter 2: Site and Proposed Scheme Description (Volume 1). The Proposed Scheme will be incorporated within an update to the existing WTP for Riverside 1 and once operational Riverside 2. A WTP represents a long term travel management strategy, detailing specific measures, designed to encourage staff and visitors to travel by more sustainable and active transport options. Appendix 21-1: Inter-Project Effects Assessment (Volume 3) provides the CEA of Other Developments. Table 21-1 provides the policies applied to and considered in the assessment.
	We reserve the right to raise other issues on consideration of documents supporting the DCO application when it is submitted. By way of example, this may include scrutiny of any temporary closures or diversions of strategic PROWs, although we would expect the relevant Local Authority (in this case the London Borough of Bexley) to lead on addressing the detail of such issues.	No response required.
Thames Water	In summary, and for the reasons set out below, TWUL has a number of concerns about the Proposed Application and in particular the direct impact on Crossness Nature Reserve, part of which is included within the Proposed Application red line. Whilst it will continue in its efforts to positively engage with Cory to shape and amend the proposals, if the Proposed Development is not amended to address these concerns, then TWUL will have no choice but to object to the DCO application following formal submission to the Planning Inspectorate	As noted in Chapter 4: EIA Methodology (Volume 1), the options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the selected development zone. The Applicant remains open and willing to engage constructively on all these matters. These documents explain how the Applicant has balanced impacts to third party land, MOL, LNR and other designations to finalise the selected development zone. Mitigation measures for habitat creation and enhancement of Crossness LNR are set out in Chapter 7 Terrestrial Biodiversity (Volume 1) the Appendix 7.6: Biodiversity Net Gain Report (Volume 3) and the Outline LaBARDS (Document Reference 7.9). The method for water supply and the interaction with Thames Water's operational assets (The Crossness Sewage Treatment Works for example) is described in Chapter 2: Site and Proposed Scheme Description (Volume 1).
	Crossness Nature Reserve ("Crossness NR") is one of the last remaining areas of grazing marsh land within the Greater London area and is an important part of the Erith Marshes Site of Metropolitan Importance for Nature Conservation. It houses a variety of habitats including the largest reedbeds in the London Borough of Bexley, ponds and ditches and areas of scrub and grassland. It is also an important site for water voles and other protected species such as breeding barn owls and reptiles.	No response required.
	TWUL has invested considerable time, money and resources in enhancing the Crossness NR over the last 25 years in pursuance of its statutory duties. Over time the Crossness NR has become an invaluable wildlife site and important community asset.	Noted
	TWUL is a statutory undertaker for the purposes of the Planning Act 2008 ("2008 Act") and is owner of the land known as Crossness NR, which is included within the red line boundary of the Proposed Application ("Proposed Acquisition Land"). 2.4ha of the Crossness NR would be permanently lost to the Proposed Development.	These points are noted, and the habitat loss within Crossness LNR is not disputed, being recognised in the impact assessment in Chapter 7: Terrestrial Biodiversity of the ES. Thames Water's points in respect of land impacts are discussed in the Statement of Reasons (Document Reference 4.1).
	TWUL has a statutory duty under section 3 of the Water Industry Act 1991 in carrying out its functions to further the conservation and enhancement of natural beauty and the conservation of flora and fauna, and to have regard to the desirability of the public to have freedom of access to places of natural beauty.	
	TWUL has a separate statutory duty under section 40 of the Natural Environment and Rural Communities Act 2006 to, "have regard so far as is consistent with the proper exercise of [its] functions, to the purposes of conserving biodiversity".	
	TWUL owns and operates the Crossness NR consistent with and for the purposes of complying with these statutory duties and commitments to Ofwat. Accordingly, the land is held for the purposes of its undertaking with the scope of section 127 of the 2008 Act. It is therefore considered that the Proposed Development, in its current form, would result in a serious detriment to TWUL's undertaking by virtue of the impact on its compliance with these statutory duties.	
	In terms of footprint, the Proposed Acquisition Land represents a 2.4 hectare or 10% loss of the total of the Crossness NR. It appears that an additional 1.7% of LNR land will be impacted by the footprint of elevated flue gas pipework. A total of 11.7% of TWUL land will be subsequently impacted.	The ecological value of land within the footprint of the Proposed Scheme coinciding with Crossness LNR has been recognised by the impact assessment process, which acknowledges that the loss of habitat will lead to effects on the Crossness LNR. The assessment in this chapter assumes there will be shading from the Proposed Scheme, leading to habitat loss in the West Paddock, this would be in a strip on the northern boundary, with most of the West Paddock remaining intact. Mitigation is proposed to address this potential loss. The bulk of habitat loss associated with the Proposed Scheme will be in the heavily grazed East Paddock, which is assessed in Chapter 7: Terrestrial Biodiversity of the ES. Habitat creation and enhancement measures have been proposed to balance effects resulting from the Proposed Scheme.
	However, it is likely the acquisition and development of this land would have a disproportionate effect on the reserve as a whole, as not only does part of the Proposed Acquisition Land include the most wildlife rich part of Crossness NR (the area known as West Paddock), the construction and operation of the development will result in considerable, irreversible harm to habitats within the remainder of the Reserve.	
	In particular, following a review of the Preliminary Environmental Information Report ("PEIR") TWUL has the following key concerns about the impacts of the construction and operation of the Proposed Development on the remaining Crossness NR:	Chapter 7: Terrestrial Biodiversity of the ES addresses contaminated run-off into watercourses during both the construction (Paragraphs 7.8.27 to 7.8.33) and operation phases (Paragraphs 7.8.68 to 7.8.74) of the Proposed Scheme. The assessment considers potential effects on protected and notable species supported by them, and measures which effectively reduce and mitigate any likely significant effects. The assessment concludes there will be no residual effects as a result of contaminated run-off during construction or operation of the Proposed Scheme.
	• Contaminated run-off – contaminated run-off (during construction and potentially operation) could result in degradation of habitats and wetlands in terrestrial parts of the TWUL's retained land, and would also affect foraging resources used by wintering birds. This degradation of ditch impact would also have significant negative impacts on water quality leading to die-off and degradation of ditch habitat supporting these species. Macroinvertebrates, water voles and freshwater fish, would all be impacted through changes to water quality resulting in fish mortality and degradation of ditch habitat supporting these species.	
	• Lighting impacts – the impacts that lighting will have on the breeding Barn Owls, foraging bat species, and the overnight winter Dunlin roost on the adjacent West Paddock. Further clarity about how any external construction and operational lighting will impact the Reserve, and any specific mitigation measures, is required.	The impact assessment in Chapter 7 of the Environmental Statement has covered lighting during both the construction (Paragraphs 7.8.34 to 7.8.39) and operation phases (Paragraphs 7.8.75 to 7.8.79) of the Proposed Scheme, considering potential effects on protected and notable species.

• Air Quality – Aquatic species in the area local to the Proposed Development are likely to experience the effects of air quality changes. This could include changes to water quality parameters through deposition of nitrogen compounds, ammonia and other polluting gases. This has the potential to result in increased eutrophication in watercourses. With 99 aquatic invertebrate species within the Crossness NR, of which 3 are Nationally Rare and 14 are Nationally Scarce (Plant, 2019), this is of particular concern since the species are important on a National level. Crossness NR also supports 718 terrestrial invertebrate species, of which 5 are Section 41 species, 5 are Nationally Rare, and 56 are Nationally Scarce (Plant, 2021). These could also be significantly impacted.	Deposition of airborne nitrogen to the Crossness LNR is assessed with respect to the published critical loads for the relevant terrestrial habitats within the Crossness LNR, in Section 5.8. The ecological impacts of this are set out in Chapter 7: Terrestrial Biodiversity (Volume 1). The impact assessment below has covered changes in air quality in both the construction (Paragraphs 7.8.40 to 7.8.50) and operation phases (Paragraphs 7.8.80 to 7.8.87) of the Proposed Scheme, considering potential effects on designated sites, habitats, protected and notable species.
• Noise and Vibration – the PEIR identifies direct, permanent, long term effects, from the operation phase, through disturbance to foraging and commuting areas for bats within Crossness LNR and associated habitats; breeding birds through disturbance to nesting and foraging areas within Crossness LNR and associated habitats; fish, through displacement and disruption of normal behaviour, as well as reptiles, terrestrial invertebrates, and water voles.	The impact assessment below has covered noise and vibration during both the construction (Paragraphs 7.8.14 to 7.8.18) and operation phases (Paragraphs 7.8.58 to 7.8.62) of the Proposed Scheme, considering potential effects on protected and notable species. With mitigation, the assessment concludes there will be no residual effects as a result of noise and vibration during construction or operation of the Proposed Scheme.
• Shading Impacts – the long-term effects from shading to bats, breeding birds, reptiles, terrestrial invertebrates, water voles, freshwater fish, aquatic macroinvertebrates, and macrophytes, through degradation of foraging and commuting, nesting and foraging, degradation of grassland, scrub, and ditch habitat, and degradation of supporting habitat. We would request that modelling is provided of the shading impacts, with graphics showing how the infrastructure, and in particular the stacks and tall (if chosen) storage tanks, would shade out ditches and other adjacent habitat.	The impact assessment below has covered shading during both the construction (Paragraphs 7.8.51 to 7.8.56) and operation phases (Paragraphs 7.8.88 to 7.8.94) of the Proposed Scheme, considering potential effects on designated sites, habitats protected and notable species. With mitigation, the assessment concludes there will be no residual effects as a result of shading during construction or operation of the Proposed Scheme.
• Visual impacts – the reduced nature reserve will see significant visual impacts due to the Proposed Scheme (90m stacks and large vertical/spherical storage tanks for liquified carbon). This would have a detrimental effect on the nature reserve visitor experience and has the potential to reduce visitor numbers.	Visual impacts are assessed by Chapter 10: Townscape and Visual (Volume 1) of the ES. Woodland these have been included in postdevelopment landscaping to act as a visual barrier.
• TWUL does not consider it appropriate for Cory to reference provision of 'a larger nature reserve'. The mitigation measures offered, are based on enhancements to 8 hectares of existing habitat (Norman Road Field) under the ownership of Peabody Estates. This habitat exists as mitigation for Peabody Estates/Tilfen Land's development on Veridion Way, and does not form part of Crossness NR. Making enhancements to existing third-party owned habitat, does not offset the 2.5 hectares of direct loss to TWUL land.	Through the DCO, the Applicant is proposed to extend the LNR designation to cover the entire Mitigation and Enhancement Area which includes Norman Road Field. This will enable all of the nondeveloped land in this area to be managed in a cohesive fashion as one, expanded, nature reserve, with enhancement across the whole area, rather than the unmanaged collection of different units that these spaces currently are. The overall package is therefore an improvement on the current position for Crossness LNR.
At a more general level, we would also question the robustness of a site selection exercise (and consideration of reasonable alternatives) that has concluded the Crossness NR is the most appropriate site for the Proposed Development. It is noted, for instance, that Fishers Way Industrial Estate is approximately 80m to east of the current proposed site; and Crabtree Manorway North and River Wharf Business Park 600m to east, such areas would appear far more appropriate for the Proposed Development.	Chapter 4 EIA Methodology (Volume 1) notes options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). This includes consideration of sites that did not include Thames Water land and the balancing of environmental effects. The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the development zone.
For all these reasons, TWUL has considerable concerns about the environmental effects that will be experienced by the Crossness NR and does not consider that alternatives to the scheme, which seek to avoid or minimise such effects have been adequately considered.	The options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). This includes consideration of sites that did not include Thames Water land and the balancing of environmental effects. The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the development zone.
From an asset protection perspective, TWUL has not received enough detailed information from Cory to understand the physical impact on its assets (impact on its network and associated infrastructure) at this stage. Accordingly, TWUL would request the provision of detailed design drawings of the Proposed Development before submission so that it can readily understand such impacts, although as a general point it should be noted that no work should be undertaken within 5m of our assets without liaising with TWUL.	The Applicant does not consider that any of the built development aspects of the Proposed Scheme will fall within 5m of Thames Water's assets. The only exception to this is the access road from Norman Road. However, the Applicant will work with Thames Water to ensure that access to its site is retained from Norman Road, including providing diversionary route(s) if this proves necessary. The Applicant will continue to engage with Thames Water as appropriate.
Additionally, we note that there has been some initial engagement in relation to water required for cooling purposes of the Development. This has suggested that the peak demand is very high and could create significant challenges from a water production and network perspective. TWUL therefore needs to work with Cory towards a lower potable water peak demand, while exploring alternative sources of water that could be used for cooling purposes.	The Applicant will continue discussions with Thames Water in relation to achievable peak potable water demand. The approach to water management has been and will continue to be discussed with Thames Water. Thames Water is currently in the process of modelling the impacts associated with the proposed water demand on the potable network. In addition, the design of the Proposed Scheme has been developed to achieve a reduction in water demand in comparison to the early design, which has been achieved by: - increasing the cycle rate of the cooling towers; - reducing cooling demand by switching to dry cooling for CO2 processing; - pre-cooling the incoming flue gas (for re-heating outlet flue gas and/or use in the Heat Recovery and Heat Transfer System; - rainwater harvesting; and - onsite storage
In addition to the above, TWUL is obliged to maintain and enhance the Crossness NR pursuant to a section 106 agreement dated 21 July 1994 ("S106"). The S106 was entered into in relation to an application for the purposes of a sludge powered generator at the Crossness Sewage Treatment Works to be constructed on the Site, defined in the S106 as the land shown edged red on Plan A to the S106.	The DCO provides for the provisions of the section 106 Agreement referred to by Thames Water to be abrogated (i.e. no longer apply). The management regime for the Crosnesss LNR is proposed to be replaced with the proposals set out in the Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy, as secured via the draft DCO and pursuant to the proposed section 106 Agreement.The Applicant would welcome discussions with Thames Water on the details of this.
The S106 binds the Site, the Crossness NR and Operational Land, defined as the then operational land at Crossness Sewage Treatment Works shown edged in green on Plan D to the S106. As such, TWUL owns and operates the Crossness NR in connection with and as a requirement of its statutory operational activities at the Crossness Sewage Treatment Works, and believes that the impacts of the Proposed Development on the Crossness NR would be significant and would prevent it from complying with its obligations in the S106.	As the DCO provides for the section 106 Agreement to be abrogated, Thames Water will no longer be required to comply with it. The land would therefore not form part of its statutory operations of the Crossness STW in the post DCO world.
It is also noted that the S106 provides for the public access of the Crossness NR, which as above forms a key asset to the community and the wider public at large. It is therefore considered that the land would be considered to be 'open space' for the purposes of sections 131 and 132 of the 2008 Act.	The Applicant has identified the land which it considers to be public open space in Planning Act 2008 terms on the basis of how it is used and able to be accessed. Land which is the subject of the section 106 and is not fenced off has been identified as 'Accessible Open Land' in the ES and Statement of Reasons, and has been acknowledged to be public open space. Land which is fenced off and not accessible to the public ('Non-Accessible Open Land') is considered to be not public open space.
TWUL's land at Crossness NR is designated as Metropolitan Open Land (MOL) which is given similar status as Green Belt in the adopted London Plan. The Major of London has also taken a strong stance in relation to no net loss of Green Belt/MOL. The recently adopted Bexley Local Plan has similarly protective policies. Therefore, such MOL land should only be used if no non MOL sites are available and if no Non MOL sites are available, 'very special circumstances' can be demonstrated.	The Applicant has sought to reduce the impacts from the Proposed Scheme on MOL through the application of the mitigation hierarchy. This is found in the 'Mitigation Heirachy' section of Chapter 6 of the Planning Statement (Document Reference 5.2).
TWUL consider that the Cory consultation material does not demonstrate a robust review of non MOL alternatives or 'demonstrate 'very special circumstances' in accordance with adopted planning policy.	The Terrestrial Site Alternatives Report (Document Reference 7.5) provides a detailed narrative of the different multiple site locations and configurations considered and the process undertaken, to minimise the area of MOL affected.
In light of these concerns, TWUL welcomes continued engagement with Cory whilst it is still formulating its proposals and there is the opportunity for the Proposed Development to be amended.	TThe options considered for both site location and layout for the Proposed Scheme are presented in Chapter 3: Consideration of Alternatives (Volume 1). The site assessment process for the Carbon Capture Facility development zone is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5).
Specifically, TWUL would wish for the following matters to be considered and addressed:	The Design Approach Document (Document Reference 5.6) presents the rationale for the selected site layout within the selected development zone. The Applicant remains open and willing to engage constructively on all these matters.
• Removal of the Crossness NR land from the Proposed Application red line boundary;	These documents explain how the Applicant has balanced impacts to third party land, MOL, LNR and other designations to finalise the selected development zone.
• A more detailed and robust consideration of non MOL alternatives in light of both the ecological impacts resulting from the Proposed Development as well as the strong policy presumption against development in this area;	Mitigation measures for habitat creation and enhancement of Crossness LNR are set out in Chapter 7 Terrestrial Biodiversity (Volume 1) the Appendix 7.6: Biodiversity Net Gain Report (Volume 3) and the Outline LaBARDS (Document Reference 7.9).
• If an alternative site is not proven to be suitable, clarity around the specific measures to avoid and mitigate the effects on the Crossness NR during construction and operation;	The method for water supply and the interaction with Thames Water's operational assets (The Crossness Sewage Treatment Works for example) is described in Chapter 2: Site and Proposed Scheme Description (Volume 1).

	• Clarity around the Proposed Development's proximity to, and impact on, TWUL's operational assets; and	
	• Further discussions around the potable water peak demand required for the Development.	
Peabody Trust and Tilfen Land Limited	4. It is useful to set out the nature of Peabody's interest in the land proposed to be included in the proposed DCO. Peabody, one of the oldest housing associations in the UK, is responsible for more than 107,000 homes and around 220,000 residents across London and the Home Counties. Their purpose is to help people flourish.	Noted
	5. Peabody became part of the Thamesmead story in 2014 when they took over from the previous owners, Gallions Housing Association, Trust Thamesmead and Tilfen Land. This meant much of the housing, community activities and more than 760 hectares of land became owned by a single body, for the first time in a generation.	Noted
	6. Peabody is leading the regeneration of Thamesmead, working with people and partners to create new opportunities and improve neighbourhoods. Their mission is to improve, grow and look after the town for the long-term (see para 8 for further details).	Noted
	7. Peabody owns 65% of the land in Thamesmead. The assets they own and manage include:	Noted
	· 240ha of green space · 5 public parks · 5 lakes · 7km of canal and waterways · 2.5km of river frontage · 53,000 trees · 5,600 homes · 15 community buildings.	Noted
	8. Peabody's work is guided by its Plan for Thamesmead, described below as "the Thamesmead Plan"). The Thamesmead Plan is revised every five years. Peabody's latest version covers 2023-28 and is accessible via the following link: Maintaining Momentum - Peabody (peabodygroup.org.uk).	Noted
	9. The Plan for Thamesmead 2023-28 sets out five goals for Peabody. They are to:	Noted
	· improve people's day to day experience of living in Thamesmead · build new homes, leisure and community spaces · improve the quality of the landscape and create more chance for people to use it · make culture a part of everyday life · support communities to be happier, healthier and wealthier	Noted
	10. Peabody's commitment to improving the quality of the landscape is underpinned by Peabody's green infrastructure framework, Living In the Landscape (accessible via the following link: living-in-the-landscape-full-report - david.dean Flip PDF | AnyFlip. This is supported by their local Biodiversity Action Plan (accessible via the following link: thamesmead-biodiveristy-action-plan-2020.pdf (peabodygroup.org.uk).	Noted
	11. Peabody has no comments regarding net zero at this stage but is generally supportive of Cory's target to reach net zero by 2040.	No response required.
	12. Peabody notes the themes which will influence the design principles of the Project. Peabody is particularly concerned in respect of people and place, for the reasons set out in Cory's consultation document. However, Peabody will want to be assured that the design of the Project, and the proposed mitigation, will fit in with their general environmental aspirations, and considers that ongoing discussion in this regard during the preparation of the application to the Planning Inspectorate, for the DCO, will be worthwhile.	The Design Approach Document (Document Reference 5.6) and the Design Principles and Design Code (Document Reference 5.7) demonstrate how the Proposed Scheme will offer tangible benefit to people, including through enhancement of accessibility and attractiveness to open space, and place by supporting the natural character of Crossness LNR. Mitigation proposals are set out in the Outline LaBARDS (Document Reference 7.9).
	13. Subject to Peabody's concerns about integration of the Project in the local context, Peabody has no comments to make at this stage, on the final design of the CO2 storage tanks.	No response required.
	14. In respect of the planning of the construction process, Peabody is concerned to limit the noise impacts and lorry movement impacts, on local people. We would like to be consulted on the proposed content of the Code of Construction Practice for the Project.	No significant effects are anticipated as a result of operational noise or lorry movements, as presented in this chapter. Mitigation measures to minimise noise impacts throughout the construction phase will be managed through the CoCP and CTMP. Outline CoCP (Document Reference 7.4) and Framework CTMP (Document Reference 7.7) are submitted with this application for development consent, and are available for comment. Any full CoCP(s) or CTMP(s) will be developed in substantial accordance with the submitted outline document. This is secured by a requirement of the Draft DCO (Document Reference 3.1).
	15. Peabody is supportive of the proposal to preserve the Belvedere Power Station Jetty but has no comments at this stage on how this should be achieved.	Chapter 2: Site and Proposed Scheme Description (Volume 1) of the ES outlines the technical requirements for the retention of the Belvedere Power Station Jetty (disused). The Belvedere Power Station Jetty (disused) Technical Note (appended to the Jetty Site Alternatives Report (Document Reference 7.6)) sets out further measures for the effective preservation of the structure.
	16. Peabody has no comments at this stage as regards the proposed new jetty.	No response required.
	17. It is apparent that it is intended, as part of the Project, to use land owned by Peabody to deliver environmental mitigation for the Project. The land is in two blocks, one known as Norman Road Fields, which is being considered to provide replacement for the parts of Crossness Local Nature Reserve that will be taken (and lost to the Nature Reserve), and the other as the Former Thamesmead Golf Course ("Golf Course").	This is correct, further information about the proposals for the Norman Road Field and Thamesmead Golf Course is provided in Chapter 2: Site and Proposed Scheme Description (Volume 1), Chapter 7: Terrestrial Biodiversity (Volume 1) and the Outline LaBARDS (Document Reference 7.9).
	18. Norman Road Fields is let on grazing licences, to members of the local community. It is important that the graziers are consulted and considered by the Project. Peabody is concerned to ensure that the future of this use is maintained. This should be addressed in the Environmental Statement.	The effects on graziers of both Norman Road Field and Crossness LNR have been included as part of the Population, Health and Land Use assessment. See Section 14.4 and Section 14.8 of the ES for further details.
	19. The former Golf Course forms part of an ongoing project with the community to deliver the wider aspirations of Peabody to deliver ecological and social improvements for the area. It follows that the Golf Course is of particular value to Peabody and the local community. Any intervention that would prejudice the ability for the established goals for this project to be realised, will not be welcomed. Considerable further engagement will be necessary in this regard so that Cory is properly aware of this project and can accommodate it.	Habitat creation and enhancement intended for the BNG Opportunity Area at the Thamesmead Golf Course are set out in Chapter 2: Site and Proposed Scheme Description (Volume 1). The Outline LaBARDS (Document Reference 7.9) presents the principles of what is sought to be achieved in this area.
	20. Peabody would also wish for Cory to consider further measures to improve public access to the River Thames, as part of their overall proposals.	The Design Approach Document (Document Reference 5.6) and the Outline LaBARDS (Document Reference 7.9) provide information on the mitigation measures and enhancements which are to be undertaken to improve the amenity of PRoW within the Site Boundary and offsite.
	21. As a general principle, Peabody is supportive of the proposals advanced by Cory to improve local area connectivity by enhancing public rights of way. As noted, this forms a critical component of the Thamesmead Plan. Peabody looks forward to reviewing Cory's detailed proposals and will continue to engage with Cory on these issues.	
	22. Although Peabody notes the Preliminary Environmental Information Report ("PEIR") provided within the consultation materials, Peabody has not had sufficient time to review the PEIR in any detail and may comment further in due course.	No response required.
	23. Peabody is aware that the intention of the Project is not to exercise DCO powers over the Golf Course, and to seek separate agreement with Peabody to carry out the required environmental mitigation on the Golf Course. Without prejudice to any eventual agreement, Peabody considers that all land over which Cory may, or may wish to, exercise DCO powers, should be included in the Project's redline boundary, and assessed within the Project's Environmental Statement.	The Applicant proposes that it and Peabody will enter into a Section 106 Agreement to secure the delivery of the BNG Opportunity Area, located within land at the former Thamesmead Golf Course. Further information can be found in Chapter 2: Site and Proposed Scheme Description (Volume 1) of the ES.

	24. At this early stage, Peabody's position is that any proposals in respect of the Peabody Land must be achieved without cost or loss to Peabody. This cost or loss will need to be based on an assessment in perpetuity, to protect Peabody from possible legacy liabilities in the long-term future.	Noted
	25. Any proposed use of compulsory acquisition powers to secure rights over the Peabody Land, which is designated Metropolitan Open Land will be resisted.	Noted
	26. The programme and timing for delivery of the works will be key and should address reprovision and relocation of existing uses and habitats prior to taking, or carrying out works to, land that may be required.	The Applicant is committed to working with Peabody on these matters. The offsite delivery of the BNG Opportunity Area will be secured by the proposed Section 106 Agreement. The Outline LaBARDS (Document Reference 7.9) contains details on mitigation works relating to reprovision and relocation of existing uses and habitats, including any relevant timings.
	27. Peabody considers itself a key stakeholder, as both a landowner and for the community, in this process, and expects to have an active and influencing role in the future stages of the application for the DCO, and in relation to the development proposed by the Project.	Noted
Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	The final LCO2 storage locations do not form part of the Proposed Scheme. However, an outline of the selection process for geological storage is provided in Chapter 2: Site and Proposed Scheme Description (Volume 1). This has been accounted for in Chapter 13: Greenhouse Gases (Volume 1).
	We welcome the opportunity to provide comments on the Preliminary Environmental Information Report (PEIR) for the proposed Cory Decarbonsation Project.	
	The proposed scheme involves exporting the CO2 that is captured as part of the Carbon Capture Facility, and that it is currently undecided where the exported CO2 will be taken. Although outside the scope of this PIER, Natural England expects that environmental considerations will be taken into account when making this decision.	
	The PIER highlights that five nationally or internationally important statutory designated sites have been considered as part of the process, which are Epping Forest SAC, Inner Thames Marshes SSSI, Ingrebourne Marshes SSSI, Oxleas Woodlands SSSI and Ruxley Gravel Pits SSSI. Chapter 7 highlights that the preliminary assessment of likely impacts and effects is able to conclude that for both construction and operational phases there will be no impact on these statutory designated sites.	Assessment of effects on these designated sites and others including non-statutory designated sites and Crossness LNR is included within Section 7.8 for both construction and operation phases of the Proposed Scheme. This includes the assessment of effects of air quality changes.
	We note that there is further work to be completed with regards to air quality and that this will be included in the Environment Statement.	
	Natural England note that a number of species surveys have been undertaken to inform the PEIR. Natural England has prepared Protected Species Standing Advice1 to help decision makers and applicants understand the impact of particular developments on protected species. We advise you to refer to this advice as part of the environmental assessment process. Natural England will only provide bespoke planning advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.	The Applicant will be seeking advice on a Letter of No Impediment for a water vole mitigation licence and note that the recommended course of action is to apply through the Discretionary Advice Service.
	As this is a Nationally Significant Infrastructure Project, should impacts to licensable protected species be likely, Natural England would recommend that you seek advice on any required Letters of No Impediment (LONI) through our Discretionary Advice Service	
	The Environmental Statement should fully consider the potential impacts to local sites, priority habitats and species and we acknowledge the surveys that have (or are being) undertaken across the site. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.	Section 7.8 of this chapter considers potential impacts to local sites, priority habitats/species (as published under Section 41 of the Natural Environment and Rural Communities Act 200616) and other important habitats/species. Enhancement of habitats within both Crossness LNR and Thamesmead Golf Course SINC will be undertaken as part of the Proposed Scheme, and these proposals have been informed by consultation with those responsible for management of those sites (Thames Water, Friends of Crossness LNR and Peabody Trust), thus proposals have been informed by local knowledge. Enhancement proposals are detailed in Appendix 7-1: Biodiversity Net Gain Report (Volume 3). Records obtained from the local biodiversity records centre (eCountability Ltd in greater London) have informed the baseline. The value of 'brownfield' habitats have been considered within the assessment. Open mosaic habitat, a Priority Habitat, is an ecological feature included.
	Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found on Gov.uk.	
	Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.	
	Natural England notes that there are areas of ancient woodland in close proximity to the You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.	The Applicant will be seeking advice on a Letter of No Impediment for a water vole mitigation licence and note that the recommended course of action is to apply through the Discretionary Advice Service.
	Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.	A review of post 1988 Agricultural Land Classification (ALC) mapping indicates that there are no soils of Best and Most Versatile (BMV) quality (ALC Grades 1 to 3a) at the Site. Therefore, an assessment of impacts to agricultural land and soils has been scoped out and it is considered that BMV soils will not be impacted during the construction and operationphases of the Proposed Scheme. In response to the EIA Scoping Opinion24, the Planning Inspectorate stated the following: "Based on the urban location of the Proposed Development, the Inspectorate is in agreement that agricultural land uses and land classification can be scoped out of the assessment for the construction and operational phases."
	Natural England has been unable to locate an assessment within the PEIR in relation to the assessment of impacts to land use and agricultural soils. That said, from the description of the development this application is likely to affect best and most agricultural land. We consider that the proposed development, if temporary as described, is unlikely to lead to significant permanent loss of BMV agricultural land, as a resource for future generations. This is on the basis that the solar panels would be secured to the ground by steel piles with limited soil disturbance and could be removed in the future with no permanent loss of agricultural land quality likely to occur, provided the appropriate soil management is employed and the development is undertaken to high standards. We note that some components of the development, such as construction of a sub-station, may permanently affect agricultural land and this should be fully assessed within the Environmental Statement.	
	However, during the life of the proposed development it is likely that there will be a reduction in agricultural production over the whole development area. Your authority should therefore consider whether this is an effective use of land in line with planning practice guidance which encourages the siting of large scale solar farms on previously developed and non-agricultural land.	
	Paragraph 5.10.8 of the National Policy Statement for Energy details that 'Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed'.	
	Similarly, Paragraph 174b and footnote 53 of the National Planning Policy Framework (NPPF) states that: 'Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'	
	Footnote 53: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. We would also draw to your attention to Planning Practice Guidance for Renewable and Low Carbon Energy (March 2015) (in particular paragraph 013), and advise you to fully consider best and most versatile land issues in accordance with that guidance.	

	Decision makers are responsible for ensuring that they have sufficient information to apply the requirements of the NPPF and the National Policy Statement for Energy. The weighting attached to a particular consideration is a matter of judgement for the decision maker. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England.	
	Should you have any questions about ALC or the reliability of information submitted with regard to BMV land please refer to Natural England's 'Guide to assessing Development proposals on Agricultural Land'. This document describes the ALC system including the definition of BMV land, existing ALC data sources and their relevance for site level assessment of land quality and the appropriate methodology for when detailed surveys are required.	
	Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon, the infiltration and transport of water, nutrient cycling, and provision of food. It is recognised that a proportion of the agricultural land will experience temporary land loss. In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management and appropriate soil use, with consideration on how any adverse impacts on soils can be avoided or minimised.	
	General guidance for protecting soils during development is also available in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and should the development proceed , we recommend that relevant parts of this guidance are followed, e.g. in relation to handling or trafficking on soils in wet weather	
	The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which sets out measures for the protection of soils within the planning system and the development of individual sites, which we also recommend is followed.	
	Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). The Environment Act also requires Nationally Significant Infrastructure Projects to deliver biodiversity net gain.	Enhancement of habitats within both Crossness LNR and Thamesmead Golf Course SINC are proposed as part of the Proposed Scheme pursuant to DCO Requirement and Section 106 Agreement. Enhancement proposals are detailed in Appendix 7-1: Biodiversity Net Gain Report (Volume 3). The Proposed Scheme aims to achieve a 10% net gain in biodiversity using the UK Government's Statutory Biodiversity Metric.
	We advise you to follow the mitigation hierarchy (avoid, mitigate, compensate) and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement. The Design Approach Document (Document Reference 5.6) and the Outline LaBARDS (Document Reference 7.9) provide information on the mitigation measures and enhancements which are to be undertaken to improve the amenity of PRoW within the Site Boundary. These measures include, but are not limited to: - positioning buildings in a linear arrangement on a north-south direction to help utilise the screening provided by the buildings themselves in public views towards the south or north; and - creation of landscape buffer along the boundaries of the Site to minimise the effects on visual amenity. In particular a landscape buffer along the western Site boundary is proposed to minimise the effects on visual amenity of users of the MOLand local PRoW, and to respond positively to local policy.
	• Providing a new footpath through the new development to link into existing rights of way.	The Design Approach Document (Document Reference 5.6) and the Outline LaBARDS (Document Reference 7.9) provide information on the mitigation measures and enhancements which are to be undertaken to improve the amenity of PRoW within the Site Boundary. These measures include, but are not limited to: - positioning buildings in a linear arrangement on a north-south direction to help utilise the screening provided by the buildings themselves in public views towards the south or north; and - creation of landscape buffer along the boundaries of the Site to minimise the effects on visual amenity. In particular a landscape buffer along the western Site boundary is proposed to minimise the effects on visual amenity of users of the MOLand local PRoW, and to respond positively to local policy.
	• Restoring a neglected hedgerow.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Creating a new pond as an attractive feature on the site.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Planting trees characteristic to the local area to make a positive contribution to the local landscape.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Incorporating swift boxes or bat boxes into the design of new buildings	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Designing lighting to encourage wildlife.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Adding a green roof to new buildings.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.

	The statutory biodiversity metric calculation tool may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project.	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted. Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement. The Design Approach Document (Document Reference 5.6) and the Outline LaBARDS (Document Reference 7.9) provide information on the mitigation measures and enhancements which are to be undertaken to improve the amenity of PRoW within the Site Boundary. These measures include, but are not limited to: - positioning buildings in a linear arrangement on a north-south direction to help utilise the screening provided by the buildings themselves in public views towards the south or north; and - creation of landscape buffer along the boundaries of the Site to minimise the effects on visual amenity. In particular a landscape buffer along the western Site boundary is proposed to minimise the effects on visual amenity of users of the MOLand local PRoW, and to respond positively to local policy.
	• Links to existing greenspace and/or opportunities to enhance and improve access	The Design Approach Document (Document Reference 5.6) and the Outline LaBARDS (Document Reference 7.9) provide information on the mitigation measures and enhancements which are to be undertaken to improve the amenity of PRoW within the Site Boundary. These measures include, but are not limited to: - positioning buildings in a linear arrangement on a north-south direction to help utilise the screening provided by the buildings themselves in public views towards the south or north; and - creation of landscape buffer along the boundaries of the Site to minimise the effects on visual amenity. In particular a landscape buffer along the western Site boundary is proposed to minimise the effects on visual amenity of users of the MOLand local PRoW, and to respond positively to local policy.
	• Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	• Planting additional street trees.	
	• Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links	The Design Approach Document (Document Reference 5.6) and the Outline LaBARDS (Document Reference 7.9) provide information on the mitigation measures and enhancements which are to be undertaken to improve the amenity of PRoW within the Site Boundary. These measures include, but are not limited to: - positioning buildings in a linear arrangement on a north-south direction to help utilise the screening provided by the buildings themselves in public views towards the south or north; and - creation of landscape buffer along the boundaries of the Site to minimise the effects on visual amenity. In particular a landscape buffer along the western Site boundary is proposed to minimise the effects on visual amenity of users of the MOLand local PRoW, and to respond positively to local policy.
	• Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).	Embedded Design, Mitigation and Enhancement (Section 7.7) and Additional Design, Mitigation and Enhancement (Section 7.9) follow the Mitigation Hierarchy approach as described. Suggestions for enhancements have been noted.Connectivity and contributions to green infrastructure that will be achieved through onsite and offsite enhancement is set out in the Outline LaBARDS (Document Reference 7.9). These measureswill be secured via a requirement in the Draft DCO (Document Reference 3.1) and Section 106 agreement.
	I hope these comments are helpful and we would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.	Noted
CLDN	CLDN has been operating at least 10 calls a week to/from Ford Dagenham since the 1990s. our captains are therefore very familiar with the conditions and navigational requirements for sailing to and from Ford's jetty, as well as on the Thames generally as CLDN operates the RoRo terminal downriver at Purfleet.	Noted
	At this stage we do not respond on detailed aspects of the landside works as our primary concern is with issues of navigational safety and impact of the Project to our operations on the River Thames. In future, we may have observations to make on aspects of the landside works f they raise issues for river navigation.	Noted
	We note from the PEIR (para 19.8.5) that consultation with affected operators (including CDN) is ongoing to better understand the impacts of the proposed jetty location. The PEIR contains limited information on these impacts and therefore our ability to comment in detail is very limited. However, you are aware already of our concerns about the design of the proposed jetty extending 160-189m into the River, with the effect of reducing the fairway. We understand that reducing requirements for capital and maintenance dredging is the main factor that has influenced the length of the jetty. CLDN considers that the proper way to approach the jetty design is dictated by the impacts to navigation; if that means additional capital dredge requirements that is a necessity of the Project. Reducing dredging requirements (and/or cost) should not drive the design process so that the Project presents issues for navigation, which are otherwise avoidable.	"A consultation meeting with CLdN was undertaken on the 18th October 2023, in which the Proposed Scheme and Proposed Jetty were discussed (see Table 19-2 of the Environmental Statement). The design of the Proposed Jetty, as described in Chapter 2 of the ES: Site and Proposed Scheme Description (Volume 1), these have been dictated by the balance of various elements which could affect construction and operation phases, including in this instance, balancing the importance of navigational ease against dredging requirements leading to loss of the foreshore (i.e. the environmental consequences of dredging). Further ship simulations were undertaken in January 2024 based upon the Proposed Jetty design, as described in Chapter 2 of the ES: Site and Proposed Scheme Description (Volume 1). The results of these ship simulations in relation to risk are detailed in Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3)."
	We note that the alternatives chapter of the PEIR does not address alternative designs, including the length of the jetty. This is in our view a flaw in design development and assessment of the Project, particularly when the impacts on navigation of the proposed design are still unknown as detailed navigation simulations have not been undertaken. We are able to comment in due course in this respect and as that we are involved in those simulations including agreeing the parameters for conducting them.	"The PEIR discussed alternative designs for the Jetty in Section 3.4, of Chapter 3: Alternatives Chapter (Volume 1).The length of the Proposed Jetty (distance into the river) put forward in the DCO application (Option 3) was established based on a number of factors including, navigational safety, dredging requirements and environmental sensitivities. Further information on the chosen location Proposed Jetty is provided in Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1) and detailed in theJetty Site Alternatives Report (Document Reference 7.6).Further ship simulations were undertaken in January 2024 based upon the Proposed Jetty design, as described in Chapter 2: Site and Proposed Scheme Description (Volume 1). CLdN reviewed and accepted the parameters proposed and attended the ship simulations. The results of these ship simulations are included in Appendix 19-1 of the Environmental Statement: Preliminary Navigational Risk Assessment (Volume 3)."
	As explained at the 18th October meeting by our Captain Veys, it is essential that vessels approaching/leaving Ford Dagenham can use the whole width of the fairway. This is because (per minutes of 18 October meeting) *when inbound on a flood tide with a strong south westerly wind, CLdN vessels having rounded Jenningtree bend, must remain close to the southern limit of the fairway to avoid being set to the north, bearing in mind their likely swept path and the fact that they are reducing speed at this time. This is particularly important with the CLdN single propeller vessels given the difficulty of maintaining directional stability on these vessels in a beam wind, when reducing speed. If an exclusion zone is present meaning vessels cannot navigate in this manner, then there would be a risk of setting too far north into shallow water and being too close to the jetty on the approach. Issue is primarily with inbound transits not outbound.	This was assessed with further ship simulations undertaken in January 2024. The results of these are detailed in Appendix 19-1 of the Environmental Statement: Preliminary Navigational Risk Assessment (Volume 3).

	At the 18 October meeting you presented an alternative jetty design which is 20m shorter than Option 2 (160m versus 180m). CLdN explained that whilst this is an improvement, the shorter design still protrudes significantly into the fairway. This is not likely to resolve the navigational impacts outlined by Captain Veys. We consider that you should also look at design/contruction of a shorter jetty to avoid these impacts, which can then also be subject to naviagtion simulations. Without doing that, our legal advice is that you will not have adequately considered options for the design of the Project or the need to consider alternatives to minimise the impact of the Project.	The alternate option presented, Option 3, is closer to the southern bank of the River Thames, therefore further from the navigation channel, than Option 2. Subject to further design development and discussion with the Environment Agency and PLA, the Proposed Jetty could potentially be set back very slightly further from the navigation channel than currently shown with Option 3 during detailed design. However, Option 3 represents the approximate maximum distance from the navigation channel and is representative of the worst case scenario due to the dredging requirements and other environmental implications as described in Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1). Option 3 was assessed with further ship simulations undertaken in January 2024. The results of these are included in Appendix 19-1 of the ES: Preliminary Navigational Risk Assessment (Volume 3).
	Further, the PEIR does not directly address potential exclusion zones around the jetty and the impacts of this on vessels passing or maneuvering to berth at Ford Dagenham, although you have stated that exclusion zones should not be applied as CO2 is not flammable. We should appreciate confirmation of this bearing in mind that the PEIR at 19.9.2 and 19.9.3 states that deconflicting measures may be initiated. These will need to be explained and discussed. Deconflicting measures should not interrupt or impede passing vessels including during construction.	This was assessed during passing vessel analysis and ship simulations undertaken in January 2024. A summary of the results of the latter are included in Appendix 19-1 of the Environmental Statement: Preliminary Navigational Risk Assessment (Volume 3).General Direction 17.1 (b) of the PLA bylaws require a 60m exclusion zone from the outer edge of the LCO2 tanker when moored alongside the Proposed Jetty. This has been accounted for in the pNRA and detailed in Section 6.1 of Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3). Passing vessels will not be impeded during construction of the Proposed Jetty.
	We also note from para 19.8.5 of the PEIR that you are yet to assess the hydrodynamic effect of large vessels passing the jetties, which may of itself indicate that the location of the jetty is unsuitable and potentially dangerous during loading of gas to vessels. It would not be acceptable to interrupt river traffic during loading operations.	Hydrodynamics were assessed with further ship simulations undertaken in January 2024. The results of these are included in Appendix 19-1 of the Envrionmental Statement: Preliminary Navigational Risk Assessment (Volume 3).
	In Summary, before CLdN can comment in detail on the Project and associated assessment there is a clear need for additional assessment work, including navigation simulations, and consideration of alternative designs.	Noted
	We would welcome further discussion with you on those items, including the navigation simulations, and are willing to attend those simulations subject to our involvement and input in the parameters, and consideration at the simulations of alternative designs which avoid the fairway. Although we cann prejudge the outcomes of further simulations, a genuine review of alternatives would ensure that the Project is designed to avoid impacting on navigation for other operators, rather than trying to make a fundamentally flawed design workable.	Noted. Since statutory consultation, the Applicant has continued to discsuss the navigational aspects of the Proposed Scheme with CLdN, and they took part in the vessel simulation studies that have occured. Further detail on this engagement is set out in the preliminary Navigational Risk Assessment.

APPENDICES VOL. 4

APPENDIX A-6 – S47 themes table

	Question		Key Themes	Applicant Response
1.	Cory has committed to reaching net zero carbon emissions across its operations by 2040. Are you supportive of Cory's plans to reach net zero through the use of carbon capture at Riverside?	A.	Consideration of alternatives / other sites	The Applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6).
		B.	Need for the Proposed Scheme	The Proposed Scheme supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in GHG emissions. It will s10upport the UK Government's legal commitment to achieve net zero by 2050 and will deliver Carbon Capture and Storage (CCS) infrastructure which the Committee on Climate Change has identified as a 'necessity' to achieving net zero and decarbonisation of the energy sector and which the Government has defined as being of critical national priority.
		C.	Unproven Carbon Capture technology. Unsure how safe the technology is?	Post-combustion carbon capture is a commercially proven technology. There are multiple plants in commercial operation worldwide, the largest having a capacity of 1.5 million tonnes per year of CO_2 captured, and these have an excellent safety record. The technology is available from several highly experienced technology providers. The proposed facility has been subject to a Hazard Identification Study (HAZID) and Quantitative Risk Assessment (QRA) to consider all relevant safety issues and ensure that no unacceptable risks are present in the project. As the project moves forward, a detailed Hazard and Operability Study (HAZOP) will also be undertaken, to further identify, assess and mitigate risk. The captured CO_2 will be securely stored in geological formations, deep below the seabed, with long term monitoring and verification to ensure that the stored CO_2 remains in place.
		D.	Loss of biodiversity (both terrestrial and marine)	An assessment of impacts on the terrestrial and marine biodiversity within the Site has been undertaken. The assessment is presented within the Environmental Statement. It is recognised that a loss of habitat will occur as a result of the Proposed Scheme being constructed, however it has been possible to mitigate this loss and provide an overall net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management. Examples of habitats to be created and enhanced include floodplain grazing marsh, grassland, reedbed, woodland and ditches for the terrestrial habitats and fitting new structures within the River Thames with ecological enhancements for example rope to mimic algae and marine plants for marine habitats.
		E.	Achieving net zero vs loss of Nature Reserve.	The Proposed Scheme supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in greenhouse gas emissions. It will support the UK Government's CCS Vision and legal commitment to achieve net zero by 2050 and will deliver infrastructure that the Committee on Climate Change has identified as a 'necessity' to achieving net zero and decarbonisation of the energy sector. The Applicant recognises that efforts to address climate change cannot come at the cost to declining wildlife and rare habitats. For this reason, an assessment of impacts on Crossness Local Nature Reserve has been undertaken, which is presented within the Environmental Statement. Furthermore, the Applicant has undertaken a robust optioneering process to ensure all impacts of the Proposed Scheme are balanced. The Importance of Crossness Local Nature Reserve and its associated wildlife has been recognised by the environmental impact assessment process, which has considered effects on wintering and breeding birds, water voles, fish, terrestrial and aquatic invertebrates as well as habitats and other protected species. It is recognised that a small part (11.7%) of the Crossness Local Nature Reserve will be lost, and the area under the footprint of the Proposed Scheme is more heavily grazed by horses stocked at high density than other areas in the Crossness Local Nature Reserve. This limits its ecological value significantly. The Proposed Scheme has committed to mitigating for such effects and achieving a net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management, for example floodplain grazing marsh, grassland, reedbed, woodland and ditches.
2.	Cory has developed four themes (people, place, value, climate) that will influence the design principles of our carbon capture proposals. Do you have any comments on these themes?	A.	Impact on ecology/nature reserve	An assessment of impacts on Crossness Local Nature Reserve has been undertaken, which is presented within the Environmental Statement. The importance of Crossness Local Nature Reserve and its associated wildlife has been recognised by the impact assessment process, which has considered effects on wintering and breeding birds, water voles, terrestrial and aquatic invertebrates as well as habitats and other protected species. It is recognised that a small part (11.7%) of the Crossness Local Nature Reserve will be lost, and the area under the footprint of the Proposed Scheme is more heavily grazed by horses stocked at high density than other areas in the Crossness Local Nature Reserve. This limits its ecological value significantly. The Proposed Scheme has committed to mitigating for such effects and achieving a net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management, for example floodplain grazing marsh, grassland, reedbed, woodland and ditches.

		B.	Construction amenity issues i.e. impacts relating to noise, light and air quality, nature reserve	The Environmental Statement (Document Reference 6.1) has assessed the potential impacts from the construction of the Proposed Scheme on local air quality, the noise environment of the Site and local surrounding area, including Crossness Local Nature Reserve. It has been concluded in that assessment that no significant effects are anticipated as a result of the construction of the Proposed Scheme in relation to air quality and noise, including Crossness Local Nature Reserve. Measures will be put place to ensure no significant effects occur, for example: • active monitoring of the Site to ensure the control of dust and emissions; • the selection of quiet and low noise / vibration equipment and methodologies where practicable; • lighting will be positioned carefully, and measures implemented to minimise light spillage into the marine environment; • development of a Dust Management Plan that is approved by the London Borough of Bexley; • construction work will be timed to avoid sensitive periods of the year for specific species, such as avoidance of bird nesting season; and • the water voles present in the Site will be subject to a programme of translocation, being moved to newly created compensatory habitats within the Mitigation and Enhancement Area before their existing habitat is disrupted.
		C.	Consideration of alternatives / other sites	The applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6).
		D.	The themes are abstract and represent more marketing than a strategy.	These design principles have been structured to align with guidance prepared by the National Infrastructure Commission Design Group. The Design Group engaged widely with a diverse and inclusive range of people including academics, architects, engineers, environmental bodies, government officials, master planners, project managers and public interest groups. They identified a strong demand for design principles to set an ambitious vision for the design of national infrastructure. These principles were therefore developed in line with the views they heard and have been adopted by the Proposed Scheme to align with this guidance.
3.	Cory will need to install CO_2 storage tanks as part of our carbon capture proposals. Decisions on the final design of these tanks, for example whether they are of a spherical or vertical design, will be influenced by a wide range of technical and environmental assessments. Do you have any comments on the two options for the design of these CO_2 storage tanks?	A.	Storage tank preference	Only three S47 consultees expressed a preference, two in favour of spherical tanks and one in favour of the vertical tanks. At this stage of the development of the project design, neither option is clearly superior to the other. It is necessary to balance a range of factors including: • Cost; • Constructability; • Operational flexibility; • Visual impact; and • Health & safety considerations. The selection will be presented as part of the detailed design submitted for discharge under DCO Requirement, which will also demonstrate how the final proposals have accounted for the Design Principles and Design Code. All of these factors will be assessed in greater detail in the next phase of the project to allow a fully informed selection to be made. The Applicant has complied with the requirements set out in the PA2008, specifically as prescribed by S42, S46, S47, S48 and S49, as well as to the Applications: Prescribed Forms and Procedure 2009 and EIA Regulations that are applicable. On the 10 November 2023 at the first Statutory Consultation Event the Applicant made available a ground-level viewpoint of the Proposed Scheme from the position of Norman Road. It was also added to the consultation website on the 10 November.
		B.	Visual impact and loss of Crossness Nature Reserve.	Once the Proposed Scheme becomes operational, including the LCO_2 Buffer Storage Area, it is likely to be a dominant feature in views for users of Accessible Open Land and the local Public Rights of Way network in close proximity to the Site. Therefore, significant effects are anticipated for changes in character and visual amenity from Accessible Open Land in proximity to the Site. The effects on other receptors are not anticipated to be significant. Mitigation measures to limit the effects on sensitive receptors will be implemented examples of such measures are: • the creation of a woodland planting along the boundaries of the Site to minimise any potential visual effects; • a permanent diversion of Footpath 2 within the woodland planting along the boundaries of the Site to minimise the view of the Proposed Scheme for users of this footpath; and • incorporating additional tree planting to provide screening to the Carbon Capture Facility.

				(Nb. Response to Crossness LNR is covered in the other themes)
		C.	Consideration of alternatives / other sites (brownfield sites/not a nature reserve)	The existing location of the Riverside Campus was selected as it is an established residual waste management site, and the land is allocated for such purposes in the London Plan 2021 and Bexley Local Plan. Riverside 1 and Riverside 2 (currently under construction) are consented developments and it would not be appropriate to relocate these facilities. As a starting point, the CCS facilities need to be located close to these plants. In this context, the Applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6) and included consideration of brownfield sites. It is noted that the conclusion of this exercise is that the vast majority of the Proposed Scheme is located on non-greenfield land which is allocated as a Strategic Industrial Location by LBB.
		D.	Neither should be considered/do not build	Recovering the carbon dioxide from Riverside 1 and Riverside 2 and moving it to locations where it can be kept from entering the atmosphere in order to mitigate global warming, supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in GHG emissions. The Proposed Scheme will support the UK Government's legal commitment to achieve net zero by 2050, and will deliver a carbon capture facility which has identified by the Committee on Climate Change as a 'necessity' to achieving net zero and decarbonisation of the energy sector.
		E.	Whichever will have least impact on environment	From the submitted plans, the footprint between the two options for the LCO_2 Buffer Storage Tanks will be minimal. Spherical Temporary LCO_2 Storage Tanks, would be approximately half the height of the vertical tanks being considered, thus could have a reduced visual impact. Spherical tanks require more labour intensive construction, taking more time and exposing the construction staff to a greater onsite risk of construction hazards. At the time of writing there is therefore no clear advantage of either the spherical or vertical design of the LCO_2 Buffer Storage Tanks environmentally. It is necessary to balance a range of factors including: • Cost; • Constructability; • Operational flexibility; • Visual impact; and • Health & safety considerations. The selection will be presented as part of the detailed design submitted for discharge under DCO Requirement, which will also demonstrate how the final proposals have accounted for the Design Principles and Design Code.
4.	Do you have any other comments on issues you feel should be addressed during the planning of the construction process?	A.	Safety of the CC facility	Post-combustion carbon capture is a commercially proven technology. There are multiple plants in commercial operation worldwide, the largest having a capacity of 1.5 million tonnes per year of CO_2 captured, and these have an excellent safety record. The proposed facility has been subject to a Hazard Identification Study (HAZID) and Quantitative Risk Assessment (QRA) to consider all relevant safety issues, and ensure that no unacceptable risks are present in the project. As the project moves forward, a detailed Hazard and Operability Study (HAZOP) will also be undertaken, to further identify, assess and mitigate risk.
		B.	General environmental impacts during construction stage (increased traffic, noise, dust) and impacts on terrestrial ecology and nature reserve	The Environmental Statement has assessed the potential impacts from the construction of the Proposed Scheme on local air quality, the noise environment, traffic and Crossness Local Nature Reserve. It has been concluded in that assessment that no significant effects are anticipated as a result of the construction phase to these receptors. Measures will be in place to ensure no significant effects occur, for example: • the creation of a woodland planting along the boundaries of the Site to minimise any potential visual effects; • a permanent diversion of Footpath 2 within the woodland planting along the boundaries of the Site to minimise the view of the Proposed Scheme for users of this footpath; and • incorporating additional tree planting to provide screening to the Carbon Capture Facility.
		C.	Transport materials by river	Middleton Jetty is used by the Applicant for waste deliveries and incinerator bottom ash export, to and from Riverside 1, operations that will intensify with Riverside 2 commencing operation. It is not practicable to use Middleton Jetty for the delivery

				of construction plant and materials for the landside or marine elements of the Proposed Scheme without compromising the effectiveness of the operations at Riverside 1 and Riverside 2 (once operational) and in turn the operability of a safeguard wharf. As described in Chapter 2: Site and Proposed Scheme Description (Volume 1) of the ES it is proposed that berthing facilities for Cory tugs operating at the Middleton Jetty are integrated to the Proposed Jetty. The berthing of Cory tugs will be facilitated via a landing pontoon which will be located at the rear of the Proposed Jetty. As well as providing berthing facilities, the pontoon will provide a means of increased safety during operations at both the Proposed Jetty and Middleton Jetty. For the Proposed Jetty (i.e., piles, precast concrete units and marine equipment such as fenders) transport will primarily be via the River Thames, where practicable. The plant and materials brought in for the construction of the Proposed Jetty will be limited to the material quantities needed for construction activities being undertaken at that time, and which are designed to be constructed within the River Thames. Where appropriate, plant and materials may be temporarily stored on a jack-up barge.
		D.	Consideration of alternatives (not on this site and not in a nature reserve) and need case	The existing location of the Riverside Campus was selected as it is an established residual waste management site, and the land is allocated for such purposes in the London Plan 2021 and Bexley Local Plan. Riverside 1 and Riverside 2 (currently under construction) are consented developments and it would not be appropriate to relocate these facilities. As a starting point, the CCS facilities need to be located close to these plants. In this context, the Applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6). It is noted that the conclusion of this exercise is that the vast majority of the Proposed Scheme is located on non-greenfield land, allocated as a Strategic Industrial Location by LBB. The Proposed Scheme supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in GHG emissions. It will support the UK Government's commitment to achieve net zero by 2050 and will deliver CCS infrastructure which the Committee on Climate Change has identified as a 'necessity' to achieving net zero and decarbonisation of the energy sector.
		E.	Impact on Crossness Nature Reserve	An assessment of impacts on Crossness Local Nature Reserve has been undertaken, which is presented within the Environmental Statement. The importance of Crossness Local Nature Reserve and its associated wildlife has been recognised by the impact assessment process, which has considered effects on wintering and breeding birds, water voles, terrestrial and aquatic invertebrates as well as habitats and other protected species. It is recognised that a small part (11.7%) of the Crossness Local Nature Reserve will be lost, and the area under the footprint of the Proposed Scheme is more heavily grazed by horses stocked at high density than other areas in the Crossness Local Nature Reserve. This limits its ecological value significantly. The Proposed Scheme has committed to mitigating for such effects and achieving a net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management, for example floodplain grazing marsh, grassland, reedbed, woodland and ditches.
5.	Cory believes there is an opportunity to preserve the Belvedere Power Station Jetty so that it could be used to protect and enhance local ornithology and heritage. If the project determines that this is possible, do you have any comments on how you would like to see this achieved?	A.	Lack of information provided on existing ornithology and heritage.	As part of the Environmental Impact Assessment process, detailed surveys of existing wintering and breeding birds and also within the Site. Ecological surveys conducted between November 2022 and October 2023 reported records of at least 54 bird species. The Belvedere Power Station Jetty is a non-designated heritage asset of low heritage significance (value) and local importance dating to the 1950s or 1960s. Its significance is derived from its historic interest as the last surviving element of the former Belvedere Power Station, which lay to the immediate east of the Site Boundary.
		B.	Consideration of alternatives for the jetty	This is set out in Chapter 3 of the Environmental Statement and the Appendix to the Jetty Site Alternatives Report.
		C.	Consultation with RSPB	The RSPB were invited to comment about the Proposed Scheme as part of the Statutory Consultation. A response was received, and these comments have been considered in the preparation of the Environmental Statement. Engagement with stakeholders, including the RSPB, will be ongoing following the DCO Application's submission.
		D.	Impact on Crossness Nature Reserve	An assessment of impacts on Crossness Local Nature Reserve has been undertaken, which is presented within the Environmental Statement. The importance of Crossness Local Nature Reserve and its associated wildlife has been recognised by

				the impact assessment process, which has considered effects on wintering and breeding birds, water voles, terrestrial and aquatic invertebrates as well as habitats and other protected species. It is recognised that a small part (11.7%) of the Crossness Local Nature Reserve will be lost, and the area under the footprint of the Proposed Scheme is more heavily grazed by horses stocked at high density than other areas in the Crossness Local Nature Reserve. This limits its ecological value significantly. The Proposed Scheme has committed to mitigating for such effects and achieving a net gain in biodiversity through habitat creation and enhancement of existing habitats and their long-term management, for example floodplain grazing marsh, grassland, reedbed, woodland and ditches.
		E	Retention of the Belvedere Power Station	The Applicant received a number of comments expressing a preference for the retention of the disused Belvedere Power Station Jetty. These were relatively evenly split between retention and demolition with a slight preference for retention. It is still the case that the Belvedere Power Station Jetty (disused) may be retained or demolished as part of the Proposed Scheme, further detail is provided in Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1). Chapter 8: Marine Biodiversity considers the impacts of both scenarios.
6.	Cory will need to install a new jetty to facilitate the off-site storage of the carbon we will capture. Do you have any comments on the new jetty we are proposing?	A.	Lack of design details of the proposed jetty (location, images, dimensions)	The location of the Proposed Jetty is shown on the Site Location Plan (Document Reference 2.1), the Works Plans (Document Reference 2.3). The dimensions of the Proposed Jetty are secured through the DCO and the indicative layout of the Proposed Jetty is shown on the Proposed Jetty Indicative Layout drawing (Document Reference 2.12).
		B.	Ecology impacts of the Jetty (both marine and terrestrial)	No significant effects are anticipated as a result of the construction or operation of the Proposed Jetty, which applies to both terrestrial and marine biodiversity. Measures will be in place in order to ensure that no significant adverse effects occur, which include but are not limited to: • All dredging associated with the Proposed Jetty (including prior to construction and maintenance dredging) will be undertaken using the backhoe method, which dredging as this will reduce the amount of sediment lost and resuspended during dredging activities reducing impacts to marine species and habitats; • Fitting the new structures within the River Thames with ecological enhancements for example rope to mimic algae and marine plants; • Lighting will be positioned carefully, and measures implemented to minimise light spillage into the marine environment; and • Construction activities such as piling and dredging would occur outside of migratory periods for sensitive fish species.
		C.	Consideration of alternatives and need case for Jetty	The Alternatives considered for the Jetty is set out in the Jetty Site Alternatives Report. A jetty is needed as the transport by vehicle of captured carbon would be practically difficult and would likely cause unacceptable traffic related impacts. The Site is not located close to any carbon pipeline proposal or sufficiently close to rail links either. As such, a jetty is the only option.
		D.	Impact on Crossness Nature Reserve	An assessment of impacts on Crossness Local Nature Reserve has been undertaken, which is presented within the Environmental Statement. The importance of Crossness Local Nature Reserve and its associated wildlife has been recognised by the impact assessment process, which has considered effects on wintering and breeding birds, water voles, terrestrial and aquatic invertebrates as well as habitats and other protected species. It is recognised that a small part (11.7%) of the Crossness Local Nature Reserve will be lost, and the area under the footprint of the Proposed Scheme is more heavily grazed by horses stocked at high density than other areas in the Crossness Local Nature Reserve. This limits its ecological value significantly. The Proposed Scheme has committed to mitigating for such effects and achieving a net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management, for example floodplain grazing marsh, grassland, reedbed, woodland and ditches.
7.	Do you have any comments on our on-site environmental mitigation area or how we could improve green spaces and habitats in the local area?	A.	Consideration of alternatives	The applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6).
		B.	Need for the Proposed Scheme	The Proposed Scheme supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in GHG emissions. It will support the UK Government's legal commitment to achieve net zero by 2050 and will deliver CCS

				infrastructure which the Committee on Climate Change has identified as a 'necessity' to achieving net zero and decarbonisation of the energy sector.
		C.	Mitigation proposals are inadequate	The importance of Crossness LNR is recognised through the evaluation undertaken in Paragraphs 7.6.40 to 7.6.42 of the Environmental Statement: Chapter 7 Terrestrial Biodiversity, which shows the reserve to be an important site for terrestrial invertebrates within Greater London. Habitat loss is recognised as an effect of the Proposed Scheme, and therefore habitat creation is proposed to mitigate and provide a net gain for biodiversity (Appendix 7-1: Biodiversity Net Gain Report (Volume 3) and Outline LaBARDS (Document Reference 7.9)). This will include flower-rich grassland habitat creation as well as improvements to the condition of existing grassland habitats to raise their biodiversity value, both intrinsically and as supporting habitat to species such as bees and other invertebrates. The Proposed Scheme will offer tangible benefit to people, including through enhancement of accessibility and attractiveness to open space, and place by supporting the natural character of Crossness Local Nature Reserve.
		D.	Consultation / negotiation with Peabody	Cory values its relationship with Peabody and commenced engagement as early in the process as practicable. It has always conducted engagement in an open, honest and timely manner and is committed to continuing in this approach as the Proposed Scheme evolves.
8.	Do you have any comments on our plans to improve connectivity in the local area, specifically through enhancing and expanding public rights of way?	A.	Consideration of alternatives / other sites	The applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6).
		B.	Need for the Proposed Scheme/support PRoW expansion	The Proposed Scheme supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in GHG emissions. It will support the UK Government's commitment to achieve net zero by 2050 and will deliver CCS infrastructure which the Committee on Climate Change has identified as a 'necessity' to achieving net zero and decarbonisation of the energy sector. Support for PRoW expansion is welcomed.
		C.	Consultation with land owners	Cory values its relationship with the landowners with interests related to the Proposed Scheme and has commenced engagement as early in the process as practicable. It has always conducted engagement in an open, honest and timely manner and is committed to continuing in this approach as the Proposed Scheme evolves.
		D.	Design Narrative	Consultation and engagement with stakeholders raised the following key issues that have influenced the Proposed Scheme design, environment proposals (including habitat mitigation) and access and recreation proposals as recorded in section 2.4 of the Design Access Document (Document Reference 5.6). • Approach to mitigation and compensation for loss of grazing marsh. • Structure of management of CLNR in light of the proposed reconfiguration and expansion. • Approach to addressing existing s.106 commitments by Thames Water with proposed CLNR and how land control of Norman Road Field (Peabody) could be structured. • Evidence of approach to alternatives to justify identified loss of grazing marsh. • Importance of relocation of stabling for graziers. • Opportunities for and nature of improved connection. • Approach to addressing risks associated with uncontrolled access CLNR. • Opportunities for diversification of habitats.

				• Nature and proximity of BNG provision. • Exploration of potential for Cory's requirements for offsite BNG resulting from Proposed Scheme to benefit delivery of Peabody landscape strategy at Thamesmead. • Strategy for consideration of massing and extent of development footprint. • Replacement of parking for users of CLNR. • Understanding approach to rewetting of soils to support grazing marsh improvement. • Impacts to Public Rights of Way. • Minimising impacts to Metropolitan Open Land and open space. • Dealing with flood risk. • Dealing with impacts to ground conditions. No significant feedback was secured from the public in relation to issues identified in the consultation material, that subsequently influenced the design. Matters identified in the consultation material for comment comprised: • Our emerging Proposed Scheme design; • Our Design Principles; and • Our Environmental Mitigation and Enhancement Opportunities proposals and Improved Connections proposals.
		E.	Not supportive of improving PRoW	Of the respondents that expressed a preference a small majority supported enhancing PRoW. We would like to provide improved access to open space(s) for local people. We are exploring opportunities to improve both access to – and the connectivity of – existing rights of way. This would see improved access to open/green spaces for local people.
9.	Do you have any further comments on Cory's decarbonisation proposals?	A.	Unproven Carbon Capture technology. Unsure how safe/true the technology is?	Post-combustion carbon capture is a commercially proven technology. There are multiple plants in commercial operation worldwide, the largest having a capacity of 1.5 million tonnes per year of CO_2 captured, and these have an excellent safety record. The technology is available from several highly experienced technology providers. The proposed facility has been subject to a Hazard Identification Study (HAZID) and Quantitative Risk Assessment (QRA) to consider all relevant safety issues, and ensure that no unacceptable risks are present in the project. As the project moves forward, a detailed Hazard and Operability Study (HAZOP) will also be undertaken, to further identify, assess and mitigate risk. The captured CO_2 will be securely stored in geological formations, deep below the seabed, with long term monitoring and verification to ensure that the stored CO_2 remains in place.
		B.	Construction amenity issues i.e. impacts relating to noise, light and air quality	The Environmental Statement has assessed the potential impacts from the construction of the Proposed Scheme on local air quality, the noise environment of the Site and local surrounding area and Crossness Local Nature Reserve. It has been concluded in that assessment that no significant effects are anticipated as a result of the construction phase in relation to air quality and noise on human and Crossness Local Nature Reserve. Measures will be in place to ensure no significant effects occur, for example: • active monitoring of the Site to ensure the control of dust and emissions; • the selection of quiet and low noise / vibration equipment and methodologies where practicable; • lighting will be positioned carefully, and measures implemented to minimise light spillage into the marine environment; • development of a Dust Management Plan that is approved by the London Borough of Bexley; • construction work will be timed to avoid sensitive periods of the year for specific species, such as avoidance of bird nesting season; and • the water voles present in the Site will be subject to a programme of translocation, being moved to newly created compensatory habitats within the Mitigation and Enhancement Area before their existing habitat is disrupted.
		C.	Loss of biodiversity (both terrestrial and marine)	An assessment of impacts on the terrestrial and marine biodiversity within the Site has been undertaken, which is presented within the Environmental Statement. It is recognised that a loss of habitat will occur as a result of the Proposed Scheme being constructed, however it has been possible to mitigate this loss and provide an overall net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management. Examples of habitats to be created and enhanced include floodplain grazing marsh, grassland, reedbed, woodland and ditches for the terrestrial habitats and fitting new

				structures within the River Thames with ecological enhancements for example rope to mimic algae and marine plants for marine habitats.
		D.	Part of the nature reserve and impacts on nature reserve	An assessment of impacts on Crossness Local Nature Reserve has been undertaken, which is presented within the Environmental Statement. The importance of Crossness Local Nature Reserve and its associated wildlife has been recognised by the environmental impact assessment process, which has considered effects on wintering and breeding birds, water voles, terrestrial and aquatic invertebrates as well as habitats and other protected species. It is recognised that a small part (11.7%) of the Crossness Local Nature Reserve will be lost, and the area under the footprint of the Proposed Scheme is more heavily grazed by horses stocked at high density than other areas in the Crossness Local Nature Reserve. This limits its ecological value significantly. The Proposed Scheme has committed to mitigating for such effects and achieving a net gain in biodiversity through habitat creation and enhancement of existing habitats and their long term management, for example floodplain grazing marsh, grassland, reedbed, woodland and ditches.
		E.	Cumulative impacts of Riverside 1, 2 and the Proposed Scheme	The impact of R1 and R2 being in place has been accounted for in all assessments, as appropriate, in considering the existing (R1) and future (with R2) baseline, for all relevant topics in the ES.
		F.	Consideration of alternatives / other sites	The applicant has undertaken an assessment of alternative sites. This assessment is presented in the Terrestrial Site Alternatives Report (Document Reference 7.5). and the Jetty Site Alternatives Report (Document Reference 7.6).
		G.	Need for the Proposed Scheme	The Proposed Scheme supports the UK's urgent need for carbon reduction infrastructure and will result in an overall reduction in GHG emissions. It will support the UK Government's legal commitment to achieve net zero by 2050 and will deliver CCS infrastructure which the Committee on Climate Change has identified as a 'necessity' to achieving net zero and decarbonisation of the energy sector.
		H.	Townscape impact of two additional stacks along with the existing stacks on site.	The area surrounding the Site is typical of industrial land uses including light industry, logistics, and industrial processes businesses. They generally are of a large scale with extensive floor area and varying building heights from around 20m up to approximately 90m with several columns and stacks extending further into the skyline. Wind turbines and tall columns and stacks feature throughout long-distance views within the surrounding area. The Environmental Statement has considered the potential impacts of introducing the additional stacks associated with the Proposed Scheme alongside the proposed two new stacks associated with Riverside 2 and the existing stack at Riverside 1. An assessment of potential effects of the Proposed Scheme (including the buildings and plant inclusive of the stack(s)) on the local townscape has been undertaken. Once the Proposed Scheme becomes operational, it is likely to be a dominant feature (and cause likely significant effects) ton views for users of the local Public Rights of Way network in close proximity to the Site. Furthermore, significant effects are anticipated for changes in character and visual amenity from Accessible Open Land in proximity to the Site. The effects on other receptors are not anticipated to be significant. Mitigation measures to reduce the effects on sensitive receptors will be implemented; examples of such measures are: • the creation of a woodland planting along the boundaries of the Site to minimise any potential visual effects; • a permanent diversion of Footpath 2 within the woodland planting along the boundaries of the Site to minimise to minimise the view of the Proposed Scheme for users of this footpath; and • incorporating additional tree planting to provide screening to the Carbon Capture Facility.

APPENDICES VOL. 4

APPENDIX B-1 – Engagement table

Date	Method of communication	Statutory Consultee	Summary of key topics discussed and key outcomes	ES chapter of relevance
22/07/2022	**Meeting**	**Port of London Authority**	Review of pNRA scope and methodology.	**Environmental Statement Chapter 19 Marine Navigation**
09/08/2022	**Meeting**	**Port of London Authority**	Validation of baseline navigational environment and review the identified preliminary hazards and key navigational matters. Discuss next steps including ship bridge simulations and the pNRA.	**Environmental Statement Chapter 19 Marine Navigation**
22/09/2022	**Meeting**	**Port of London Authority**	Presentation and discussion of the initial pNHA findings, and associated works which had been undertaken up to that point. Information presented was an early iteration of Appendix 19-1: Preliminary Navigation Hazard Analysis (Volume 3) of the PEIR1. Scope of pNRA agreed between NASH Maritime, WSP, and the PLA.	**Environmental Statement Chapter 19 Marine Navigation**
31/01/2023	**Email**	**London Borough of Bexley**	Preliminary Zone of Theoretical Visibility (ZTV) along with suggestion for 10 no. viewpoint locations issued for comment and recommendations on Study Area and selected viewpoints; and any sensitivities in relation to townscape or visual receptors which needed consideration.	**Environmental Statement Chapter 10 Townscape and Visual**
03/02/2023	**Email**	**London Borough of Bexley**	LBB confirmed that viewpoints are acceptable at this stage. The viewing platform at Lesnes Abbey was suggested as an additional viewpoint, along with Frank's Park and locally designated views, which were added as viewpoints.	**Environmental Statement Chapter 10 Townscape and Visual**
13/02/2023	**Email**	**London Borough of Bexley**	Contact made seeking environmentally pertinent information and substructure and geological hazard data held relevant to the Study Area.	**Environmental Statement Chapter 17 Ground Conditions**

17/02/2023	**Email**	**Thames Water**	Initial introductory consultation meeting to present the Proposed Scheme and the approach to consulting with the Friends of Crossness LNR about the design development of the Proposed Scheme	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
27/02/2023	**Email**	**London Borough of Bexley**	Response received asking for a plan showing the approximate location of the Proposed Scheme to support the above enquiry with regard to contamination. The response included information from LBB's Building Control Team regarding substructure and geological hazard information. The information is as follows: "The ground conditions in the area are typically a mixture of made ground, clay, and underlying peat to depths of up to approximately 12m in places. The vast majority of sites in this part of the borough opt for a pile foundation design to overcome issues in relation to poor substrata. Raft foundations are occasionally specified for smaller projects. This is true for the majority of Belvedere north of Abbey Road and Lower Road. Localised borehole investigation would be necessary on the proposed site to allow for a designed foundation solution from a structural engineer. Industrial projects locally have also seen it necessary to allow for piled road bases leading to and around the site".	**Environmental Statement Chapter 17 Ground Conditions**
28/02/2023	**Email**	**London Borough of Bexley**	A plan was sent to LBB as requested. At the time of writing, no response has been received regarding pertinent contamination information relating to the Study Area.	**Environmental Statement Chapter 17 Ground Conditions**

29/03/2023	**Meeting**	**Port of London Authority**	Presentation of the initial findings of the Appendix 19-1: Preliminary Navigation Hazard Analysis (Volume 3) of the PEIR1, including the preliminary hazard identification. Discussion regarding the options for the location and layout of the Proposed Jetty, including the preferred location and layout. Discussion on the next steps for navigation safety work including the ship bridge simulations and scope of the pNRA (which was agreed). Presentation of analysis illustrating passing cargo and tanker transits in proximity to the preferred location and layout of the Proposed Jetty.	**Environmental Statement Chapter 19 Marine Navigation**
12/04/2023	**Meeting**	**Friends of Crossness Local Nature Reserve**	Initial introductory consultation meeting to present the Proposed Scheme and the approach to consulting with the Friends of Crossness LNR about the design development of the Proposed Scheme	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
13/04/2023	**Meeting**	**Environment Agency**	Key Topics: Marine Biodiversity Net Gain (BNG); type of licenses/ scope of surveys; marine benthic ecology (encompassing shellfish, Invasive Non-Native Species (INNS), the mudflat and river wall survey; and supporting information for a WFD and the habitat assessment); and confirmation of approach to grab sampling for macrobenthos and fish surveys. Key Outcomes: no concerns identified with the marine biodiversity methodology, content with sampling methodology and locations; and agreed the BNG will focus on the intertidal area of the Proposed Scheme and not the subtidal area.	**Environmental Statement Chapter 8 Marine Biodiversity**

22/05/2023	**Email**	**London Borough of Bexley**	Scope: Proposed traffic survey scope and construction/operation traffic routing, which outlined: Proposed survey types and locations; Proposed construction traffic routing between proposed site and strategic road network (SRN); and Proposed survey timings (mid- 2023). Response/Outcomes (7th June 2023): Additional survey locations suggested, which have been added to the survey scope; and Highlighted local guidance note, Installation of Temporary Traffic Count Equipment.	**Environmental Statement Chapter 18 Landside Transport**
22/05/2023	**Email**	**Royal Borough of Greenwich**	Scope: Proposed traffic survey scope and construction/operation traffic routing, which outlined: Proposed survey types and locations; Proposed construction traffic routing between proposed site and strategic road network (SRN); and Proposed survey timings (mid-2023). Response/Outcomes (31st May 2023) 14/03/2024 Noted that the survey scope included the main vehicle routes affecting the Borough. No additional comments	**Environmental Statement Chapter 18 Landside Transport**
22/05/2023	**Email**	**Dartford Borough Council**	Scope: Proposed traffic survey scope and construction/operation traffic routing, which outlined: Proposed survey types and locations; Proposed construction traffic routing between proposed site and strategic road network (SRN); and Proposed survey timings (mid-2023). Response/Outcomes (26th May 2023): Noted position as secondary tier authority with KCC acting as primary LHA; and Noted sensitivities surrounding the A2026 Burnham Road due to its residential nature	**Environmental Statement Chapter 18 Landside Transport**

			and proximity of Dartford town centre which is readily impacted upon by traffic diverting from the SRN.	
22/05/2023	**Email**	**Kent County Council**	Scope: Proposed traffic survey scope and construction/operation traffic routing, which outlined: Proposed survey types and locations; Proposed construction traffic routing between proposed site and strategic road network (SRN); and Proposed survey timings (mid-2023). Response/Outcomes (25th May 2023): Noted area of Dartford is heavily congested around access to SRN; and Noted that Riverside 2 did not require modelling of the A2026 Burnham Road junction, nor the A282 J1a or 1b as the level of predicted traffic generation did not warrant it. If the level of traffic is anticipated to be similar to the previous application, then this assumption is likely to remain and therefore no traffic surveys would be required at these junctions. However, evidence should be provided at the appropriate time to demonstrate this.	**Environmental Statement Chapter 18 Landside Transport**

22/05/2023	**Email**	**Transport for London (TfL)**	Scope: Proposed traffic survey scope and construction/operation traffic routing, which outlined: Proposed survey types and locations; Proposed construction traffic routing between proposed site and strategic road network (SRN); and Proposed survey timings (mid-2023). Response/Outcomes: No response received at the time of writing (correspondence sent to both the Officer that responded directly to the Riverside 2 statutory consultation and also to the TfL Spatial Planning inbox).	**Environmental Statement Chapter 18 Landside Transport**
23/05/2023	**Meeting**	**London Borough of Bexley**	Presented the approach to the air quality assessment. LBB in agreement with the approach.	**Environmental Statement Chapter 5 Air Quality**
24/05/2023	**Meeting**	**Port of London Authority**	Ship bridge simulations for Options 2 and 3 for PLA pilots to test approach, berthing, and de-berthing at Proposed Jetty. Options 2 and 3 of the Proposed Jetty are discussed further in Chapter 3 of the Environmental Statement: Consideration of Alternatives (Volume 1)	**Environmental Statement Chapter 19 Marine Navigation**
26/05/2023	**Scoping Opinion**	**London Borough of Bexley**	Within the EIA Scoping Opinion, LBB confirmed that “The Council is generally satisfied at the details submitted in this [socio-economics] chapter and that the applicant has adequately addressed this issue at this stage” (Page 6 and 7 of LBB’s scoping consultation letter in Appendix 2 of the EIA Scoping Opinion12). As LBB was satisfied with the assessment methodology set out in Chapter 14: Socio-economics of the EIA Scoping Report12, the Council has not been contacted further.	**Environmental Statement Chapter 14 Population Health and Land Use**
05/06/2023 (Launch of Non-Statutory Consultation)				

19/06/2023	**Email**	**Natural England**	Request for opening a dialogue with respect to the Proposed Scheme. A HRA Screening Report was provided for comment.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
04/07/2023	**Email**	**Thames Water**	Provision of biological records, ecological survey reports and quarterly wildlife reports for Crossness LNR	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
14/07/2023 (End of Non-Statutory Consultation)				
19/07/2023	**Email**	**London Borough of Bexley**	Discussion of the usage and condition of PRoW, Metropolitan Open Land (MOL) and Urban Open Space. had limited information of the current usage and condition of PRoW and therefore, PRoW usage and conditions surveys will be undertaken to better inform the population, health and land use assessment to be presented in the ES. LLB has been consulted with regarding the proposed PRoW survey locations. Further information on the area of MOL and links to the Council's Green Infrastructure Study was provided.	**Environmental Statement Chapter 14 Population Health and Land Use**
22/07/2023	**Meeting**	**Port of London Authority**	Consultation with Ford's Jetty's vessel operator will be expedited. It was agreed that pellet buoys will be located in the River Thames to mark the location of the Proposed Jetty in order to assess the adequacy of the manoeuvring area for tugs and barges. PLA confirmed that the Sept-22 Automatic Identification System (AIS) dataset used for the pNHA meets the PLA's requirements for the pNRA. The PLA confirmed that the Study Area proposed is appropriate for the pNRA. Methodology and consultees for the pNRA were discussed. PLA to provide information on future traffic profile. Significance of passing vessel (hydraulic) interaction to be considered	**Environmental Statement Chapter 19 Marine Navigation**

			further during the process of the pNRA. The PLA confirmed that the pNRA scope was suitable.	
10/08/2023	**Email**	**UK Health Security Agency (UKHSA)**	Discussion on the proposed methodology for the assessment of human health, mental health and wellbeing. UKHSA agreed the scope and methodology for the human health, mental health and wellbeing assessment. However, it is noted that the community's understanding or perception of risk should extend beyond the use of amine-based solvents to hydrogen production, storage and transportation. However, as described in Chapter 1: Introduction (Volume 1) the Hydrogen Project is no longer included in the scope of the Proposed Scheme and as such this extension has not been included. The UKHSA noted that guidance on a suitable approach to the mental health assessment has been provided within their response to the Scoping Report, which has been used to inform this assessment.	**Environmental Statement Chapter 14 Population Health and Land Use**
22/08/2023	**Email**	**Thames Water, Peabody and London Borough of Bexley**	Discussions with the various landowners on the proposed approach and locations of monitoring points for the PRoW usage survey. The approach and locations were agreed by all parties.	**Environmental Statement Chapter 14 Population Health and Land Use**
24/08/2023	**Email**	**Northern Gas Networks**	Confirmation of the location of the pipelines referred to in the Scoping Opinion. Northern Gas Networks confirmed that it does not cover the area of or around the Site.	**Environmental Statement Chapter 20 Major Accidents and Disasters**
06/09/2023	**Email**	**Scotia Gas Networks (on behalf of Southern Gas Networks)**	The Applicant requested information on the location of gas assets in proximity to the Proposed Scheme	**Environmental Statement Chapter 20 Major Accidents and Disasters**

07/09/2023	**Email**	**UK Health Security Agency (UKHSA)**	SGN provided a Plant Protection working advice document and directed the Applicant to the 'Linesearch before u dig' website to access maps illustrating the location of gas infrastructure.	**Environmental Statement Chapter 20 Major Accidents and Disasters**
13/09/2023	**Meeting**	**Thames Water, Peabody and London Borough of Bexley**	Presentation of the Proposed Scheme in its current form including identified mitigation requirements and opportunities. Q&A and consideration of setting up a working group to progress design elements.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
14/09/2023	**Meeting**	**Northern Gas Networks**	Tour of Riverside 1. Presentation and discussion of the Proposed Scheme in its current form including identified mitigation requirements.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
18/09/2023	**Email**	**Scotia Gas Networks (on behalf of Southern Gas Networks)**	Summary of non-statutory consultation	**N/A**
20/09/2023	**Email**	**GLAAS**	The Applicant's consultants, WSP, contacted GLAAS via email on 20th September 2023, setting out the proposed survey methodology and general mitigation strategy approach (in the absence of Site-based evaluation), as presented in the PEIR17 (see Section 9.9). GLAAS responded on 21st September to confirm that it is in broad agreement of the approach. In summary, GLAAS: • stated an update to the geoarchaeological deposit model produced for the Riverside Energy Park Order 2020 by Quest Quaternary Scientific in 202218 will be required. The deposit model will need to be related to the proposed pile and pile cap plan and possible remediation areas to inform which parts of the Site would require further mitigation;	**Environmental Statement Chapter 9 Historic Environment**

			• requested that the proposed intertidal foreshore survey should be carried out prior to the construction phase. Subsequent foreshore surveys will be required during the construction phase and up to six months after its completion; • stated that the impact from temporary works will also need to be considered, including those associated with anchor chains (see Paragraph 9.4.3 for scoping of temporary effects). It is anticipated that a community engagement condition would be attached to planning consent, should this be granted (see Paragraph 9.9.12); • agreed that, should the Belvedere Power Station Jetty be demolished, a Historic England 'Level 2' historic building recording would be necessary to record the asset prior to its loss. Level 2 recording comprises a descriptive record where the structure will be seen, described and photographed. It includes a drawn record, photography and a written record; and • stated that the low potential for prehistoric period archaeological remains to occur as set out in the PEIR17 and baseline would need to be tested against the buried deposits model.	
22/09/2023	**Meeting**	**Natural England**	Initial introductory consultation meeting to present the Proposed Scheme and decide next steps in the consultation process and assign roles. Natural England to provide a response on the HRA Screening Report following this meeting.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**

22/09/2023	**Meeting**	**Natural England**	Key Topics: overview of the construction works within the marine environment, including the loss of intertidal and subtidal habitat. Key Outcomes: Natural England did not provide any comments on this at the time.	**Environmental Statement Chapter 8 Marine Biodiversity**
29/09/2023	**Email**	**Natural England**	HRA Screening Response from Natural England received and confirmed agreement with the approach set out in the HRA Screening Report.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
03/10/2023	**Email**	**Erith Rowing Club**	Erith Rowing Club were advised that the purpose of stakeholder consultation was to inform the pNRA and to define hazards and appropriate risk control measures to reduce risk associated with the Proposed Jetty. Erith Rowing Club advised that the potential location of the Proposed Jetty presented to them, that being Option 2, may pose hazards for navigating this section of the River Thames, however the impact on Erith Rowing Club would be somewhat negligible. Note: This was based on Proposed Jetty Option 2 which is not part of the Proposed Scheme (see Chapter 3: Consideration of Alternatives (Volume 1))	**Environmental Statement Chapter 19 Marine Navigation**

04/10/2023	**Meeting**	**GPS Marine**	GPS confirmed the presented AIS plots from AIS Data are representative of the realworld scenario and an accurate overview. A key concern for GPS Marine related to the potential positioning of the Proposed Jetty, explaining that when muck away barges are outbound on an ebb tide it is necessary for them to navigate south of the authorised channel when approaching Jenningtree bend. GPS stated that the current position of the jetty would block the route south of the authorised channel for tankers, risking vessels being set too far north and grounding or colliding with inbound vessels. An increased number of vessel movements was a concern for GPS, but noted inbound vessels would need to give way to them on an ebb tide. Contact with construction barges was the main concern for GPS during the construction phase. Note: This was based on Proposed Jetty Option 2 which is not part of the Proposed Scheme (see Chapter 3: Consideration of Alternatives (Volume 1))	**Environmental Statement Chapter 19 Marine Navigation**

05/10/2023	**Email**	**GLAAS**	On 5 October, the Applicant's consultants, WSP, provided a response via email to GLAAS to request clarification on the likely timings of any surveys/mitigation with respect to pre and post application for development consent submission, and to provide further justification for the archaeological potential as set out in the PEIR17. WSP suggested that the proposed updated geoarchaeological deposit model is not used prior to submission to inform more extensive intrusive evaluation (e.g. trial trenching) for the purposes of informing design (i.e. through avoidance where significant archaeological remains are identified). Considering the nature of the likely effects (e.g. deep piles or localised shallow ditches), it would be neither feasible nor warranted to carry out such an evaluation (not least which would require very deep stepped/shored trenches). Instead, it was proposed that the deposit model is the final archaeological mitigation, used to map subsurface deposits and subsurface topography across the Site as a whole (including the marine and intertidal areas) for posterity. This post-determination model would update the existing model18, which presents extensive information on buried sediments and maps the prehistoric terrain beneath superficial deposits of made ground and alluvium, including deeper channels and higher areas which may once have been occupied and vegetated prior to	**Environmental Statement Chapter 9 Historic Environment**

			rising water levels. On 6 October, GLAAS agreed that the archaeological deposit model could be produced post-determination under a DCO requirement, once wider geotechnical investigations (GI) have been carried out. GLAAS also agreed that the marine geophysical surveys could be conducted post-determination as a DCO requirement. Once the foreshore survey and geotechnical data has been analysed, the requirements for further mitigation would need to be discussed and agreed.	

05/10/2023	**Meeting**	**CLdN**	Discussions around vessel plots from AIS Data and whether these are representative of the real-world scenario, CLdN confirmed the presented AIS plots were an accurate overview. CLdN commented that vessels transited south of the authorised channel because they were able to do so, not because they needed to do so, and were unaware of any current navigational risks requiring their vessels to navigate in this manner. It was agreed that CLdN would notify their captains of the proposed operations and asked to give their opinions and respond to a number of queries. These responses are presented in this table. CLdN were concerned about the potential proximity of the Proposed Jetty to the authorised channel, and felt it was too close, though this would be raised with the captains for response. Note: This was based on Proposed Jetty Option 2 which is not part of the Proposed Scheme (see Chapter 3: Consideration of Alternatives (Volume 1))	**Environmental Statement Chapter 19 Marine Navigation**
08/10/2023	**Meeting**	**CldN Captain A**	CLdN asked their captains to provide responses and feedback to the Proposed Jetty. Captain A stated that the full width of the fairway was used due to “the limited manoeuvrability power of the Cobelfret vessels plying this route”, and due to the wind and current this room was needed. It would also be a struggle to navigate further north, but as long as navigation in the authorised channel is possible there should be no issues. Exclusion zones around vessels, plant, and equipment during the construction phase, forcing vessels further north within the authorised channel, would be an issue, however. Note: This was based on Proposed Jetty Option 2 which is not part of the Proposed	**Environmental Statement Chapter 19 Marine Navigation**

			Scheme (see Chapter 3: Consideration of Alternatives (Volume 1))	
08/10/2023	**Meeting**	**CLdN Captain C**	CLdN asked their captains to provide responses and feedback to the Proposed Jetty. Captain C stated that due to the size of CLdN vessels calling at Dagenham departing on ebb and flood tide, the full channel width is required in order to complete manoeuvres safely. CLdN vessels tend to sail as close as possible to the southern edge of the fairway when reducing speed compensating for drift due to wind and tide, and there is some concern regarding draw off at very low speeds. Additionally, vessels require a clear run in both directions from Crayfordness to the berth. Concern on how this will be established was mentioned. Note: This was based on Proposed Jetty Option 2 which is not part of the Proposed Scheme (see Chapter 3: Consideration of Alternatives (Volume 1)).	**Environmental Statement Chapter 19 Marine Navigation**

09/10/2023	**Meeting**	**CLdN Captain B**	CLdN asked their captains to provide responses and feedback to the Proposed Jetty. Captain B stated that the presence of the Proposed Jetty will make their life more complicated. The first concern is that small craft and recreational vessels would be using the main channel, impeding the safe passage of larger vessels. Secondly, during strong winds vessels currently get close to Middleton Jetty, and would get even closer to the Proposed Jetty should it be built. The last main concern is that scheduled arrivals and departures of CLdN vessels will be affected by the arrivals and departures of vessels for the Proposed Scheme. Note: This was based on Proposed Jetty Option 2 which is not part of the Proposed Scheme (see Chapter 3: Consideration of Alternatives (Volume 1)).	**Environmental Statement Chapter 19 Marine Navigation**
09/10/2023	**Meeting**	**Heidelburg Aggregates**	Stakeholders were advised that the purpose of stakeholder consultation was to inform the pNRA and define hazards and appropriate risk control measures to reduce risk associated with the Proposed Jetty Option 2 and Marine Operation and were asked their views on a number of items, which are detailed in Section 5 of Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3). A Heidelburg Aggregates captain stated that he uses the full extent of the navigation channel, and that the area is tight as it is, so having a vessel sat against the Proposed Jetty would make the space even tighter. Large tankers also use this area of the River Thames. Note: This was based on Proposed Jetty Option 2 (see Section 3.4 of Chapter 3: Consideration of Alternatives (Volume 1)).	**Environmental Statement Chapter 19 Marine Navigation**

18/10/2023	**Meeting**	**CLdN**	CLdN stated that it is crucial that CLdN vessels are able to utilise the full width of the fairway when navigating to and from Ford's Jetty; any encroachment of the Proposed Scheme into the fairway as a result of any exclusion zone around the Proposed Jetty would not be acceptable. Conflict with Tug and Barge traffic is currently relatively infrequent. Jenningtree is not seen as an appropriate location for vessels to pass due to narrow fairway and bend. When presented with the Option 3 (see Chapter 3: Consideration of Alternatives (Volume 1)) for the Proposed Jetty, CLdN stated that this was more preferable. All parties agreed that further detailed simulation work is necessary to allow CLdN captains to get a feel for how they would be impacted by the presence of a new structure on their key area of operation near where they berth and manoeuvre their vessel, and identify any problems which could arise whilst undertaking these simulation runs.	**Environmental Statement Chapter 19 Marine Navigation**
18/10/2023 (Launch of Statutory Consultation)				
20/10/2023	**Email**	**London Borough of Bexley**	Scope: Update on the Proposed Scheme following submission of PEIR, whilst also detailing (through a supporting memo) the proposed Transport Assessment (presented in Appendix 18-1: Transport Assessment (Volume 3))/EIA methodology. Response/Outcomes: No response received at the time of writing.	**Environmental Statement Chapter 18 Landside Transport**

20/10/2023	**Email**	**Royal Borough of Greenwich**	Scope: Update on the Proposed Scheme following submission of PEIR, whilst also detailing (through a supporting memo) the proposed Transport Assessment (presented in Appendix 18-1: Transport Assessment (Volume 3))/EIA methodology. Response/Outcomes: No response received at the time of writing.	**Environmental Statement Chapter 18 Landside Transport**
20/10/2023	**Email**	**Dartford Borough Council**	Scope: Update on the Proposed Scheme following submission of PEIR, whilst also detailing (through a supporting memo) the proposed Transport Assessment (presented in Appendix 18-1: Transport Assessment (Volume 3))/EIA methodology. Response/Outcomes: No response received at the time of writing.	**Environmental Statement Chapter 18 Landside Transport**
20/10/2023	**Email**	**Kent County Council**	Scope: Update on the Proposed Scheme following submission of PEIR, whilst also detailing (through a supporting memo) the proposed Transport Assessment (presented in Appendix 18-1: Transport Assessment (Volume 3))/EIA methodology. Response/Outcomes: Noted that the Transport Assessment (presented as Appendix 18-1: Transport Assessment (Volume 3)) should review the Kent Emerging Local Transport Plan 5: Turning the Curve Towards Net Zero 20239 dated June 2023. □ Recommended the review of traffic assignment given the passage of time since Riverside 2 assessment and the changes in travel patterns which have occurred in the	**Environmental Statement Chapter 18 Landside Transport**

			interim.□ Noted that traffic data from the surveys should be provided to confirm that the proposed assessment of traffic impact does not need to be extended further.	
20/10/2023	**Email**	**TFL - Spatial Planning**	Scope: Update on the Proposed Scheme following submission of PEIR, whilst also detailing (through a supporting memo) the proposed Transport Assessment (presented in Appendix 18-1: Transport Assessment (Volume 3))/EIA methodology. Response/Outcomes: No response received at the time of writing.	**Environmental Statement Chapter 18 Landside Transport**
26/10/2023	**Email**	**Thames Water**	Discussion on the use of the East Paddock and Stable Paddock (that forms part of the Crossness LNR) by horse graziers. The East Paddock and Stable Paddock land parcels are shown in Figure 1-2 of the Environmental Statement: Satellite Imagery of the Site Boundary Plan (Volume 2). Details of the facilities, use of land and the frequency of use were provided and have been used to inform the assessment presented in chapter 14 of the Environmental Statement.	**Environmental Statement Chapter 14 Population Health and Land Use**
27/10/2023	**Email**	**London Borough of Bexley**	An email was sent to LBB requesting a response to the enquiry sent on 28th February 2023. No response has been received at the time of writing.	**Environmental Statement Chapter 17 Ground Conditions**

27/10/2023	**Email**	**Environment Agency**	Contacted for environmentally pertinent information including contamination issues, water quality, landfill records and remedial works relating to the Study Area.	**Environmental Statement Chapter 17 Ground Conditions**
31/10/2023	**Email**	**Environment Agency**	Response received stating that the above enquiry had been forwarded on to the Environment Agency Customers and Engagements Team.	**Environmental Statement Chapter 17 Ground Conditions**
07/11/2023	**Meeting**	**Port of London Authority**	Meeting to undertake a review of Option 3 (representative of the Proposed Jetty as put forward in the DCO application) and explore key themes and outcomes of the stakeholder consultation exercise summarised above alongside additional analysis. During the meeting, information was also provided on the inherent risk assessment results, additional risk control measures, and the residual risk assessment results	**Environmental Statement Chapter 19 Marine Navigation**
14/11/2023	**Email**	**Environment Agency**	The Environment Agency provided the following guidance to timings of works in relation to fish species via Email: “If percussive piling is necessary in the water, piling should be carried out outside the main periods of fish migrations. In the River Thames, this is between April to September inclusive, whilst for sites close to spawning areas, this period is extended to March to September inclusive."	**Environmental Statement Chapter 8 Marine Biodiversity**
21/11/2023	**Email**	**London Borough of Bexley**	Zone of Theoretical Visibility (ZTV) along with suggestion for viewpoint locations reissued for comment and recommendations on Study Area and selected viewpoints; and any sensitivities in relation to townscape or visual receptors	**Environmental Statement Chapter 10 Townscape and Visual**

			which needed consideration. A response was not received as of February 2024.	
27/11/2023	**Email**	**Friends of Crossness Local Nature Reserve (LNR), Thames Water**	Provision of raw ecological data results from surveys undertaken to support the assessment of impacts, in preparation for meeting with both consultees (see row below).	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
28/11/2023	**Meeting**	**Peabody**	Discussion on the use of Norman Road Field by horse graziers. Norman Road Field is shown in Figure 1-2: Satellite Imagery of the Site Boundary Plan (Volume 2). Details of the facilities, use of land and the frequency of use were provided and have been used to inform the assessment presented in this chapter.	**Environmental Statement Chapter 14 Population Health and Land Use**
29/11/2023 (End of Statutory Consultation)				

01/12/2023	**Meeting**	**Environment Agency**	Key Topics: WFD Assessment; discussion regarding sediment contaminants; discussion of dredging periods and timings to avoid impacting migratory fish species discussion of piling techniques; discussion regarding vessel movements; concern raised on potential intertidal habitat loss if Belvedere Power Station Jetty (disused) removed; and concern regarding wave wash and effects on intertidal habitats. Key Outcomes: Environment Agency to provide guidance on fish migration periods. Further discussion to take place on BNG and WFD in December 2023. Environment Agency highlighted that Water injection Dredging (WID) is known to also occur elsewhere on the Thames for maintenance dredging.	**Environmental Statement Chapter 8 Marine Biodiversity**
01/12/2023	**Email**	**Abena Oppong-Asare MP**	Summary of statutory consultation	**N/A**
04/12/2023	**Meeting**	**Friends of Crossness Local Nature Reserve, Thames Water**	Ecological survey methods and results as well as the content of Chapter 7: Terrestrial Biodiversity (Volume 1) of the PEIR were discussed through a question and answer session, followed by a walkover of the Site to gain insight on where the Friends of Crossness LNR members thought ecological gains could be made through enhancement and landscaping.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**

13/12/2023	**Meeting**	**Environment Agency**	Key Topics: WFD Assessment; discussion regarding water quality standards; mitigation measures; discussion of dredging methodology; discussion of avoidance periods for dredging and piling in the River Thames; and concern regarding wave wash and effects on intertidal habitats. Key Outcomes: additional confirmation and consultation with the MMO regarding sampling to be undertaken. Environment Agency to provide guidance on dredging. Environment Agency to provide comment on the WFD Screening and Scoping Report	**Environmental Statement Chapter 8 Marine Biodiversity**
15/12/2023	**Email**	**Environment Agency**	Response to enquiry relating to pertinent environmental information for the Study Area. Within the response, the Environment Agency states that it has no record of any sites being determined as Contaminated Land under Section 78 of the Environmental Protection Act 19907 in the vicinity of the Site nor any designated special sites. The Environment Agency provided a list of sources where information relating to water quality, the presence of Above Ground Storage Tanks and gas meters, current permitted sites, pollution incidents, and historic landfill sites could be found. A review of these sources provided by the Environment Agency has been conducted and is presented in Appendix 17-1 of the Environmental Statement: Preliminary Risk Assessment (Volume 3).	**Environmental Statement Chapter 17 Ground Conditions**

26/01/2024	**Email**	**Abena Oppong-Asare MP**	Site visited arranged for 26 January 2024 but postponed at the stakeholder's request. New dates being sought.	**N/A**
29/01/2024	**Meeting**	**Port of London Authority, CIdN and Heidelburg Aggregates**	Ship bridge simulations for Options 2 and 3, to assess the impact (if any) of the Proposed Jetty options on existing CLdN vessels navigating to and from Fords Jetty, assess the impact (if any) of the Proposed Jetty options on passing vessel transits, particularly passing distance and speed, and further understand how (if at all) the Proposed Jetty influences the positioning of vessels within the authorised channel when transiting Halfway Reach and Jenningtree bend. The results of these simulations are detailed in Section 6 of Appendix 19-1: Preliminary Navigational Risk Assessment (Volume 3).	**Environmental Statement Chapter 19 Marine Navigation**
09/02/2024	**Email**	**London Borough of Bexley**	The Short-List as described in Paragraphs 21.5.16 to 21.5.18 of this chapter and presented in Appendix 21-1 of the Environmental Statement: Inter-Project Effects Assessment (Volume 3) was issued to LBB for its review and comment. No response has been received at the time of writing.	**Environmental Statement Chapter 21 Cumulative Effects**
14/02/2024	**Meeting**	**Friends of Crossness Local Nature Reserve, Thames Water**	Meeting to progress the items from the meeting on 04/12,and identify further improvements that could be made to Crossness LNR that Friends of Crossness LNR thought would benefit the reserve. Concept drawings for the Proposed Scheme and landscaping were presented and discussed.	**Environmental Statement Chapter 7 Terrestrial Biodiversity**
20/02/2024	**Email**	**Port of London Authority**	PLA confirmed that 'normally matters of security would be up to the jetty operator/owner to organise their own arrangements in line with the ISPS [International Ship and Port Facility Security] Code'.	**Environmental Statement Chapter 15 Socioeconomics**

22/02/2024	**Meeting**	**Port of London Authority**	Meeting to formally discuss the PLA's General Direction requirement for a 60m exclusion zone around a moored LCO2 vessel at the Proposed Jetty. The exclusion zone would not apply to the Proposed Jetty alone as the terminal is not an oil or gas jetty, and it would only apply to passing (through) traffic. The PLA agreed that the applicability of the General Direction to the berthed LCO2 tanker could be revisited pending the provision of gas dispersion modelling providing further context as to the nature, extent, and effects of a LCO2 release. Until such a time that evidence is provided to reduce or remove the exclusion zone, the PLA would enforce a 60m exclusion zone on a precautionary basis. It was agreed the simulations had demonstrated that vessels could safely navigate well clear of the proposed exclusion zone extent in accordance with the General Direction.	**Environmental Statement Chapter 19 Marine Navigation**
05/03/2024	**Meeting**	**Port of London Authority**	Meeting to present the findings of Appendix 19-1 of the Environmental Statement: Preliminary Navigational Risk Assessment (Volume 3).	**Environmental Statement Chapter 19 Marine Navigation**

APPENDICES VOL. 4

APPENDIX B-2 – Email issued to the London Borough of Bexley (25 May 2023) in regard to the non-statutory round of consultation.

[redacted]

Sent: 25 May 2023 16:17
To: Smith, Ian
Cc: [redacted]
Subject: Cory Decarbonisation Project - Consultation Strategy

Hi Ian
I hope you've had a good week.
I think we spoke a while back when I explained the consultation strategy that we were looking to deploy for Cory's current DCO, the Decarbonisation Project. Whilst, as you will be aware, we have started meetings and discussions with key stakeholders and neighbours (including London Borough of Bexley) following advice from the Planning Inspectorate we have deliberately not started any public consultation until after the Scoping Opinion is due to be published (next week). However, we have a busy couple of months coming up and I wanted to let you know what was planned, for your information.

From 5 June (to 15 July) we are running a first round of informal consultation. This will involve having information available on the website (corydecarbonisation.co.uk), holding webinars via Zoom (6 to 7pm on 28 June and 4 July), and 2 pop-up events (16 and 17 June). People attending any of these events will be provided with information about the project and free methods for responding to us. We'll also be placing posters in the local community advertising all these events and speaking at a meeting of the Belvedere Community Forum.

If you'd like any further information, or would like to attend any of these events, please do just let me know.

Formal consultation on the project, based around the PEIR, is scheduled for Autumn of this year, with exact dates and events to be confirmed.

Also, Rob mentioned to Richard that a presentation to the Scrutiny Committee might be welcomed, as was done for REP. I believe Richard has sent a slide pack through to Rob, the presentation that we gave to LBB officers recently, but we've not heard any more about presenting to Members. I just wanted to check whether this was something you would like us to do.

Best wishes, Kirsten

[redacted]

APPENDICES VOL. 4

APPENDIX B-3 – *Bexley and Bromley News Shopper* print advertising (07, 14 June 2023)

Local celebrity cat Stella has been found after three months of searching Image: Rebecca Williams

Facebook post brings 'celebrity' cat home

A MISSING cat dubbed as a "local celebrity" in Beckenham has been found after three months of searching.

Stella the cat first went missing on the evening of Sunday, February 19 at around 11.30pm on Copers Cope Road.

Since then, Stella's owner and the people of Beckenham have searched wide and far for the beloved cat.

On June 3, a photo of a white and ginger cat was shared onto a Facebook group, which was later revealed to be Stella.

Rebecca Williams, Stella's owner, says she is going to be "making up for lost time" with Stella.

She told the News Shopper: "A lot of people are pleased that Stella is home, thank you to the lovely Jean, who put the post on to Facebook.

"Since she has been home, she has been cuddling up to all of us and sleeping on the sofa.

"We've just got a new rescue kitten too, so Stella will have some company.

"They haven't been introduced just yet, but I am sure they will be partners in crime".

Rebecca explained that Stella is a rescue cat from Romney House in Downe and was originally on the streets of Romania.

Stella is now around five years old.

Stella the cat is well known locally for her love of people, big personality and wandering paws. Many people typically saw Stella on a day-to-day basis.

The name Stella is inspired by the snow leopard in the Northern Lights by author Philip Pullman, who is named Stelmaria.

'Human poo' discovered on floor of pub

By BERK UYAL
berk.uyal@newsquest.co.uk
@berk_uyal

A CLIP has gone viral on social media claiming a person "took a poo" on the floor of a Wetherspoons in Bromley.

The discovery was reportedly made at the Richmal Crompton in Westmoreland Place on May 21.

The clip, a conversation between two people on Snapchat that has been recorder and posted on Twitter, now has 18,900 views.

In it, one person claims that someone "took their ar** out" and had a poo at the bar.

The person explains in a 18-second clip: "Me, Ollie, and Darrell are in Bromley South Spoons.

"And there is flour on the floor next to the bar.

"So, Ollie asked the barman, what's going on here?

"Apparently someone got their ar** out and took a sh** on the floor on a Sunday night in Bromley South Spoons."

The News Shopper contacted Wetherspoons regarding the clip on Twitter.

A spokesperson for Wetherspoons confirmed that an "unidentified" substance was discovered on the pub's floor.

It added the pub's management took the precaution of applying a chemical spillage kit to the substance before cleaning the area fully.

The full statement from Wetherspoons said: "An unidentified substance was discovered on the pub's floor.

"The pub's management took the precaution of applying its chemical spillage kit to the substance before cleaning the area fully."

CORY

HAVE YOUR SAY
ON CORY'S DECARBONISATION PLANS

DECARBONISATION

We're asking for your views on Cory's plans to capture the carbon dioxide emitted at our energy from waste facilities in Belvedere. Our decarbonisation project also includes exploring the potential for producing low carbon hydrogen onsite.

This introductory consultation will run from Monday 05 June to Friday 14 July 2023. There will be further opportunities to have your say as the project progresses.

Please visit our website, corydecarbonisation.co.uk, to find out more about our proposals and provide us with your comments.

SPEAK TO THE TEAM

DATE	TIME	LOCATION
Friday 16 June 2023	1pm to 4pm	Upper Belvedere Library, Woolwich Road, Belvedere, DA17 5EQ
Saturday 17 June 2023	9am to 12pm	To the front of Asda Belvedere Superstore, Station Road, Belvedere, DA17 6DF

ONLINE EVENTS

We will also be hosting two webinars from 6pm to 7pm on Wednesday 28 June and Tuesday 4 July. To register, please visit our website at corydecarbonisation.co.uk

ASK US A QUESTION AND HAVE YOUR SAY

Telephone: 0330 838 4254 Email: decarbonisation@corygroup.co.uk
Post: FREEPOST CORY CCS Online: corydecarbonisation.co.uk

THE DEADLINE FOR COMMENT IS 14 JULY 2023

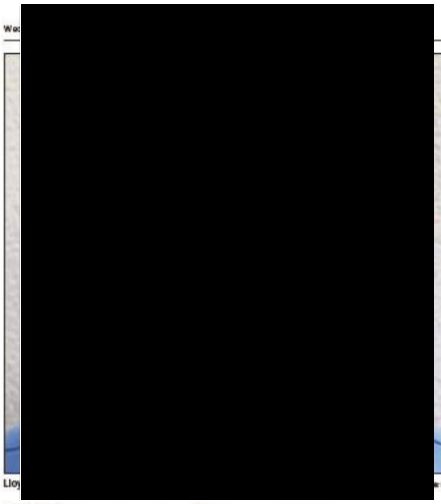
Kent Life Offer

Purchase your copy of the June Kent Life from M&S, Waitrose, Sainsbury and Tesco and enjoy a copy of **Coast Magazine worth £4.99**, the best guide on where to go & what to do by the sea!

KENT LIFE

Kent Life is your one-stop guide to this beautiful county encompassing food and drink venues, local events and brilliant ideas for days out with the family. Whether you want to learn more about our stunning towns and villages or are simply looking to spend an hour or so with the county's celebrities, Kent Life is the perfect publication to keep you entertained all month.

Purchase your copy of Kent Life in June from M&S, Waitrose, Sainsbury and Tesco for just £4.99



Homeless man sent to jail for burgling house

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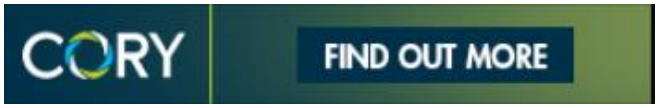
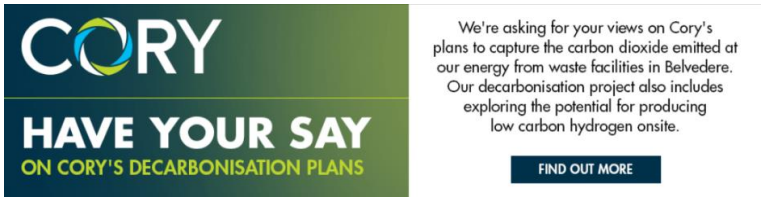
APPENDICES VOL. 4

APPENDIX B-4 – *Bexley and Bromley News Shopper* digital advertising (05 June to 14 July 2023)


CORY
FIND OUT MORE


CORY
HAVE YOUR SAY
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We're asking for your views on Cory's plans to capture the carbon dioxide emitted at our energy from waste facilities in Belvedere. Our decarbonisation project also includes exploring the potential for producing low carbon hydrogen onsite.
FIND OUT MORE

CORY
HAVE YOUR SAY
ON CORY'S DECARBONISATION PLANS

CORY
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FIND OUT MORE

CORY
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FIND OUT MORE

APPENDICES VOL. 4

APPENDIX B-5 – Poster displayed to promote non-statutory consultation

CORY

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THE DEADLINE FOR COMMENT IS 14 JULY 2023

APPENDICES VOL. 4

APPENDIX B-6 – Facebook post on the Belvedere Community Centre Facebook Group (13 June 2023)

Belvedere Community Centre
13 June 2023 ·

Just a friendly reminder This Thursday 6pm-7:30pm

Belvedere Community Centre
6 June 2023 ·

Public meeting for Cory's decarbonisation plans.

Thursday 15th Jun3 6pm-7:30pm Belvedere Community Centre

Mitchell Close DA17 6AA

Like Comment

APPENDICES VOL. 4

APPENDIX B-7 – Ward Cllrs, MPs, Community Group and Keep in Touch email notification of launch of non-statutory consultation (05 June 2023)

From: Decarbonisation
Sent: 18 October 2023 09:23
To: OPPONG-ASARE, Abena <abena.oppongasare.mp@parliament.uk>
Subject: Launch of statutory consultation on Cory's decarbonisation proposals

18 October 2023

Dear Ms Oppong-Asare

Launch of statutory consultation on Cory's decarbonisation proposals

Today marks the launch of Cory's statutory consultation on our plans to install carbon capture technology at our energy from waste facilities in Belvedere.

Our project has the potential to capture and permanently store c.1.3 million tonnes of carbon dioxide (CO_2) every year by 2030, decarbonising our waste management process. Cory's decarbonisation project also has the potential to significantly contribute to achieving the UK's net zero goal, as well as reaching our own target of being net zero by 2040.

The aim of this consultation, open from Wednesday 18 October to Wednesday 29 November 2023, is to explain our proposals and give people the opportunity to express their views. The feedback submitted will then be considered as we refine our plans before submitting our application for Development Consent.

To provide your views on the project or submit feedback, you can:

- Email us at decarbonisation@corygroup.com
- Complete our online feedback form at: [insert link once live]
- Write to FREEPOST CORY CCS, no stamp needed
- Visit us at one of our in-person events:

Date	Time	Location
Friday 10 November	09:00-12:00	B&Q Belvedere, Station Road, off Lower Road, Belvedere, DA17 6DF
Friday 10 November	15:00 -19:00	Belvedere Community Centre, Mitchell Close, Belvedere DA17 6AA
Saturday 11 November	09:00-12:00	Belvedere Community Centre, Mitchell Close, Belvedere DA17 6AA

We will also be hosting a webinar from 6pm to 7pm on Wednesday 15 November. To register, please visit our website at corydecarbonisation.co.uk

If you have any questions on this consultation, or on the project itself, please feel free to call us on 0330 838 4254 or visit our website at corydecarbonisation.co.uk.

Thank you for your interest in the project and we look forward to hearing from you.

Yours sincerely

Richard Wilkinson
Project Director, Cory Group

APPENDICES VOL. 4

APPENDIX B-8 – Non-statutory consultation website

WELCOME

ABOUT CORY

Cory is one of the UK's leading recycling and waste management companies. We help to ensure that London and the South East have a safe, clean and sustainable way of managing recyclable and non-recyclable waste.

Our Riverside 1 energy from waste (EfW) facility processes around 785,000 tonnes of non-recyclable black bag waste each year, enough to fill St Paul's Cathedral 12 times.

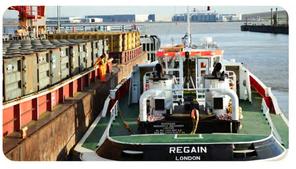
Uniquely, we use the River Thames to move waste through London to our EfW facility, taking the equivalent of 100,000 heavy goods vehicles off the road each year.

PROJECT FEEDBACK

We welcome your feedback on our plans to decarbonise our energy from waste facilities in Belvedere.

SUBMIT FEEDBACK

INTRODUCTION TO THE PROJECT



Cory has ambitious plans to decarbonise our waste management processes by capturing the carbon dioxide emitted at our EfW facilities in Belvedere and storing it permanently and safely under the North Sea in depleted oil and gas fields. Our project also includes exploring the potential for producing low carbon hydrogen at our site, using the electricity from our EfW facilities.

Our plans have the potential to capture c.1.3 million tonnes of carbon dioxide every year by 2030, decarbonising our EfW process, and reducing the carbon dioxide emissions of the waste we process for households and businesses in London and the South East. The project will also help contribute to achieving the UK's net zero targets.

PROJECT TIMELINE

VIEW TIMELINE

We will be hosting two webinars from 6pm to 7pm on Wednesday 28 June and Tuesday 4 July. Please register using the links below.

REGISTER HERE FOR WEDNESDAY 28 JUNE

REGISTER HERE FOR TUESDAY 4 JULY

FAST FACTS

70%

OF LOCAL AUTHORITIES ARE AIMING FOR NET ZERO BY 2040 OR EARLIER

1.3M TONNES

OUR PLANNED CCS PROJECT WILL BE ABLE TO CAPTURE c.1.3 MILLION TONNES OF CARBON DIOXIDE PER YEAR BY 2030

2040

CORY'S NET ZERO TARGET

FREQUENTLY ASKED QUESTIONS

This page provides answers to questions that directly relate to our decarbonisation proposals and are likely to be of interest to stakeholders and the wider local community. They will be regularly reviewed to ensure they are up to date.

How much carbon dioxide will you capture?

Our CCS project has the potential to capture c.1.3 million tonnes of CO_2 per year. This equates to more CO_2 than is emitted by a town the size of Reading each year.

What is carbon capture and storage (CCS)?

CCS is a process that captures carbon dioxide (CO_2) emissions from energy generation sources such as power plants, EfW facilities and other industrial emission sources. It is then transported and stored safely so that it will not re-enter the atmosphere.

VIEW ALL FAQS

1. Do you have any comments or questions about Cory's decarbonisation proposals for our site in Belvedere?

Character Count: 7000

Enter your feedback

CONTINUE

CORY

HEAD OFFICE
10 Dominion Street
Floor 5
London
EC2M 2EF

T. 0330 830 4254
E. decarbonisation@corygroup.co.uk

Cory is the trading name for each of the companies within the Cory Group, comprising Cory Topco Limited (registered company number 11385842) and its subsidiaries including Cory Environmental Holdings Limited, Cory Environmental Limited, Riverside Resource Recovery Limited, Riverside (Thames) Limited, Riverside Energy Park Limited, Cory Ship Repair Services Limited, and Cory Booking Operations Limited.

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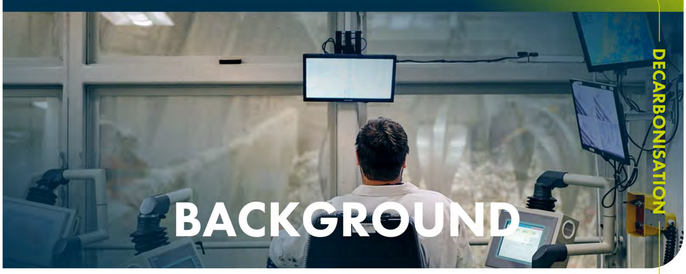


DECARBONISATION

BACKGROUND

RIVERSIDE 1

Our Riverside 1 facility was opened in 2011 as one of the UK's most efficient energy from waste (EfW) plants, processing waste from households and businesses across London and the South East.

It remains one of the largest EfW facilities in the UK and the only one with river infrastructure for transporting and receiving waste.

Today, Riverside 1 processes up to 785,000 tonnes of non-recyclable (also known as residual) waste a year - enough to fill St Paul's Cathedral 12 times.

It also produces enough low carbon baseload electricity to power the equivalent of 195,000 homes.

RIVERSIDE 2

We are currently constructing our second EfW facility, Riverside 2, on the site adjacent to Riverside 1.

Riverside 2 will further address the critical need within London and across the South East of England for additional infrastructure to treat residual waste (waste that cannot be reused or recycled), diverting it from landfill and export overseas.

It will be one of the largest and most efficient EfW facilities in the UK, processing around 650,000 tonnes of non-recyclable waste to recover enough low carbon electricity to power 176,000 homes each year.

The facility will utilise well-established moving grate incineration technology, which has been successfully deployed across numerous operational EfW facilities in the UK, including Riverside 1, and globally.

Riverside 2 will share existing infrastructure with Riverside 1 to minimise the need for new construction and use of resources. It is planned to be operational by 2026.

WHY CARBON CAPTURE AND STORAGE?

The UK Government has set a legally-binding target for the country to reach net zero emissions by 2050 to avoid the worst impacts of climate change. All parts of the UK economy must work to decarbonise by this time.

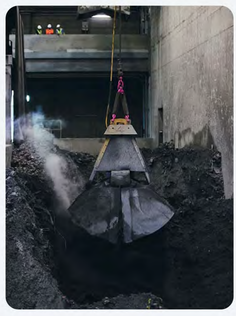
In practice, this means that we need to reduce our emissions of carbon dioxide (CO_2) to as close to zero as possible.

Carbon capture and storage (CCS) is a process that captures CO_2 emissions from industry and energy generation sources such as power plants and EfW facilities, and stores it safely so that it will not re-enter the atmosphere.

In Cory's case, the opportunity is significant. Our plans have the potential to capture c.1.3 million tonnes of CO_2 every year by 2030, decarbonising our EfW process and contributing to the UK's net zero targets by delivering negative carbon emissions.

This will also provide a significant contribution to reducing the carbon emissions of the several million people Cory serves in London and the South East.

The location of our Riverside facilities on the bank of the River Thames provides us with the potential to extend our river infrastructure for transporting the CO_2 we capture. The liquid CO_2 will be transported by ship for safe storage deep under the North Sea seabed in depleted oil and gas reservoirs. The project includes a new jetty for this purpose.



WHAT IS HYDROGEN?

To reach the UK Government's target of net zero by 2050, cleaner fuels such as hydrogen have a role to play in the Government's plans.

Our proposals include the potential to produce low carbon hydrogen that can be used by both road vehicles and river/marine vessels travelling locally. Importantly, no CO_2 is produced from using hydrogen as a fuel, and it therefore doesn't contribute to climate change.

1. Do you have any comments or questions about Cory's decarbonisation proposals for our site in Belvedere?

Character Count: 7000

Enter your feedback

CONTINUE

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DECARBONISATION

PROPOSALS

PROJECT OVERVIEW

Cory has ambitious plans to decarbonise our energy from waste facilities in Belvedere.

Our project has the potential to capture c. 1.3 million tonnes of carbon dioxide (CO_2) every year by 2030, decarbonising our EfW process, and thereby almost eliminating the CO_2 emissions of the waste we process for households and businesses in London and the South East. The project will also help contribute to achieving the UK's net zero targets.

Our project also includes exploring the potential for producing low carbon hydrogen which could help to decarbonise transportation, including river and marine vessels, by producing a zero carbon transport fuel.

We want to make sure that our local community is consulted and given an opportunity to help shape our plans. We are therefore sharing early information about the project ahead of a formal statutory consultation later this year. This early consultation will run from **Monday 05 June to Friday 14 July 2023**, and will give local people the chance to find out more and ask us questions.

PROJECT TIMELINE

VIEW TIMELINE

We will be hosting two webinars from 6pm to 7pm on Wednesday 28 June and Tuesday 4 July. Please register using the links below.

REGISTER HERE FOR WEDNESDAY 28 JUNE

REGISTER HERE FOR TUESDAY 4 JULY

HOW DOES CARBON CAPTURE AND STORAGE WORK?

Carbon capture and storage (CCS) is a process that captures CO_2 emissions from energy generation sources and industrial processes such as power plants and energy from waste facilities, storing it safely so that it will not re-enter the atmosphere.

To capture the CO_2 emitted by our existing and in-development energy from waste facilities, we need to install a carbon capture operational plant and technology together with associated infrastructure. This will divert the emissions from our facilities and enable us to separate and collect the CO_2.

Once captured, this CO_2 will be compressed and liquified on site, and then be transferred by ship to offshore sites under the North Sea for safe storage.

Using this technology will help us decarbonise our business and reach net zero emissions by 2040. In turn, this will make a positive contribution to the UK Government's overall plan to reach net zero emissions for the UK by 2050.

PROJECT FEEDBACK

We welcome your feedback on our plans to decarbonise our energy from waste facilities in Belvedere.

SUBMIT FEEDBACK

Our planned development would consist of the following:

1. FLUE GAS SUPPLY
   We will modify the flue stacks (or chimneys) on our Riverside 1 and Riverside 2 energy recovery facilities so that our emissions can be re-directed to our proposed carbon capture plant.

2. CARBON CAPTURE PLANT
   Once within the plant, the flue gases will go through a process known as chemical absorption to separate out the CO_2.

3. COMPRESSION, CONDITIONING AND LIQUEFACTION
   The captured CO_2 must then undergo compression, dehydration, oxygen scavenging and liquefaction (turning it into a liquid) to allow for its onward journey by ship and prepare it for safe storage underground.

4. LIQUEFIED CO_2 BUFFER STORAGE
   Before being transported by ship, the liquified CO_2 will need to be stored on site, in above-ground pressure vessels.

5. LIQUEFIED CO_2 LOADING SYSTEM
   The liquid CO_2 will be transported by ship along the River Thames for safe storage deep under the North Sea seabed in depleted oil and gas reservoirs.

This technology would allow us to capture up to 95% of the carbon dioxide from our two energy from waste facilities, c.1.3 million tonnes. Combined with the high proportion of biogenic carbon (carbon dioxide absorbed by vegetation as it grows) in the waste that we receive, we are proud to say that this project could make our EfW operations at Belvedere carbon negative. Essentially, this means that we will be removing more CO_2 from the atmosphere than we emit.

HYDROGEN PRODUCTION AND STORAGE

To reach the UK Government's target of net zero by 2050 cleaner fuels, such as low carbon hydrogen, have a key role to play.

Our proposals include the potential to produce low carbon hydrogen that can be used by both road vehicles and river/marine vessels, travelling in and out of London. Importantly, no carbon dioxide is produced as a by-product of using hydrogen as a fuel, so its use doesn't contribute to climate change.

As one of the most plentiful elements on earth, hydrogen can be found all around us in compounds such as water and natural gas. In order to extract pure hydrogen and use it as a fuel, we will use electrolysis to split water into its constituent elements of hydrogen and oxygen. This process would be powered by a portion of the decarbonised electricity generated by our energy from waste plants, instead of us supplying it to the national grid.

Our potential hydrogen production process can be broken down into the following steps:

1. ELECTRICITY SUPPLY
   As soon as our carbon capture plant is operational, Riverside 1 and Riverside 2 will supply our hydrogen project with decarbonised electricity.

2. WATER TREATMENT
   Because the water needed to produce hydrogen through electrolysis needs to be deionised, we will install a water treatment plant on site to carry out this process.

3. ELECTROLYSIS PLANT
   Once this deionised water is produced, it will undergo electrolysis, separating it into its constituent parts of hydrogen and oxygen. The oxygen produced by this process will be either vented (i.e. released) or supplied to industrial users of oxygen.

4. SCRUBBING, DEHYDRATION, DEOXIDISING AND PURIFICATION
   The hydrogen produced through electrolysis will then go through scrubbing, dehydration, deoxidising and purification to remove any leftover electrolyte (i.e. oxygen and / or water), ensuring the required level of purity.

5. HYDROGEN STORAGE
   Until we transport the hydrogen produced, it will be stored safely on site, as either a gas or a liquid.

6. HYDROGEN EXPORT/USE
   The hydrogen fuel produced by this process could then be used to enable HGVs and river/marine vessels to move away from fossil-based fuels and, in doing so, make a meaningful contribution to the UK's net zero targets.

PROPOSED JETTY

We want to continue to use the river as this provides the most sustainable form of transport to export the captured CO_2, and potentially hydrogen, from the site. The former Belvedere Power Station Jetty, (now disused) is a potential location for this new infrastructure.

ENVIRONMENTAL CONSIDERATIONS

We provide an essential service to communities and businesses in London and the South East. As a recycling and waste management company, our operations contribute towards environmental protection by ensuring waste is disposed of in a way that reduces the risk of pollution and negative environmental impacts.

We are committed to protecting the environment through continually improving the environmental performance of our operations. As part of developing our carbon capture plans, we will prepare an Environmental Statement that will set out the environmental impacts of our proposals as well as proposed mitigation measures. It will be considered independently by the Planning Inspectorate as it determines our application.

Given that our site borders the River Thames, we are also keenly aware of the importance of protecting marine life and biodiversity. We have already completed surveys in the area and will take appropriate action to ensure that the area is protected in line with the relevant legislation and guidance from bodies such as the Environment Agency.

We are still at an early stage in the development process and will make more information available about how we intend to protect our environment as our project progresses.

1. Do you have any comments or questions about Cory's decarbonisation proposals for our site in Belvedere?

Character Count: 7000

Enter your feedback

CONTINUE

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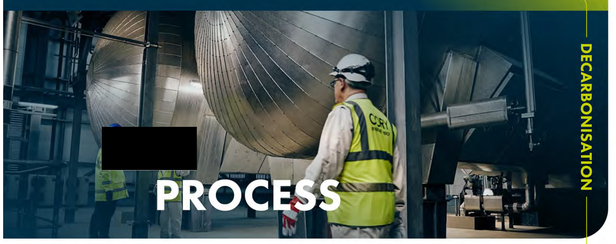

PROCESS

DEVELOPMENT CONSENT PROCESS

Our decarbonisation proposals will be assessed through an application for a Development Consent Order (DCO) submitted under the Planning Act 2008. Following community and stakeholder engagement, the application will be decided by the Secretary of State for Energy Security and Net Zero.

During the public consultation process, we will engage with a wide range of community, technical and political stakeholders, including local residents and the local authority (London Borough of Bexley).

An extensive local stakeholder and community consultation will therefore be undertaken prior to submitting the application for Development Consent.

During this process we will be engaging with key stakeholders and members of the public on our proposals, starting with an introductory consultation period from **Monday 05 June to Friday 14 July**.

The aim of this initial consultation period is to explain our early proposals and give people the opportunity to express their views. It marks the first opportunity for us to engage the local community and key stakeholders on our early plans and invite your feedback to help shape our proposals.

We will then hold a further public consultation on our project later this year. This will provide more information about our proposals and offer a further opportunity to provide feedback. We will take the comments we receive into account when we finalise our application for a Development Consent Order.

CCS FACILITY OPERATIONAL BY 2028

If the Secretary of State grants development consent for our decarbonisation plans, we expect to start construction in 2026, with a target of the initial phase of the CCS facility being operational by 2028.

STAKEHOLDERS

Cory aims to be an asset to the communities in which we operate; working to build strong, long-term and mutually beneficial relationships.

We will continue this commitment to the local community as we bring forward our new proposals by consulting with stakeholders to gather feedback on the project as it takes shape.

These stakeholders, or consultees, are split into three groups:

1. Statutory bodies, the relevant local authorities, landowners, and others with an interest in the land or who may be affected by the construction and operation of a consented scheme.
2. The local community of people living or working near to the proposed project or those who may have an interest in the area.
3. The general public. These are people beyond the local community.

We will carry out targeted activities for each group of consultees and a statement of community consultation (SoCC) will be published in 2023, which will detail our approach to consulting the local community.

PROJECT OVERVIEW

Cory has ambitious plans to decarbonise our energy from waste facilities in Belvedere.

FIND OUT MORE

We will be hosting two webinars from 6pm to 7pm on Wednesday 28 June and Tuesday 4 July. Please register using the links below.

REGISTER HERE FOR WEDNESDAY 28 JUNE

REGISTER HERE FOR TUESDAY 4 JULY

CORY DECARBONISATION PROJECT TIMELINE

2011
Riverside 1 EfW facility opened

2020
Riverside 2 granted a Development Consent Order (DCO)

2023
Construction of Riverside 2 EfW starts

2023
Consultation launches on CCS proposals

2024
DCO submission CCS project

2011 — 2030

FAST FACTS

70%
OF LOCAL AUTHORITIES ARE AIMING FOR NET ZERO BY 2040 OR EARLIER

1.3M TONNES
OUR PLANNED CCS PROJECT WILL BE ABLE TO CAPTURE c.1.3 MILLION TONNES OF CARBON DIOXIDE PER YEAR BY 2030

2040
CORY'S NET ZERO TARGET

1. Do you have any comments or questions about Cory's decarbonisation proposals for our site in Belvedere?

Character Count: 7000

Enter your feedback

CONTINUE

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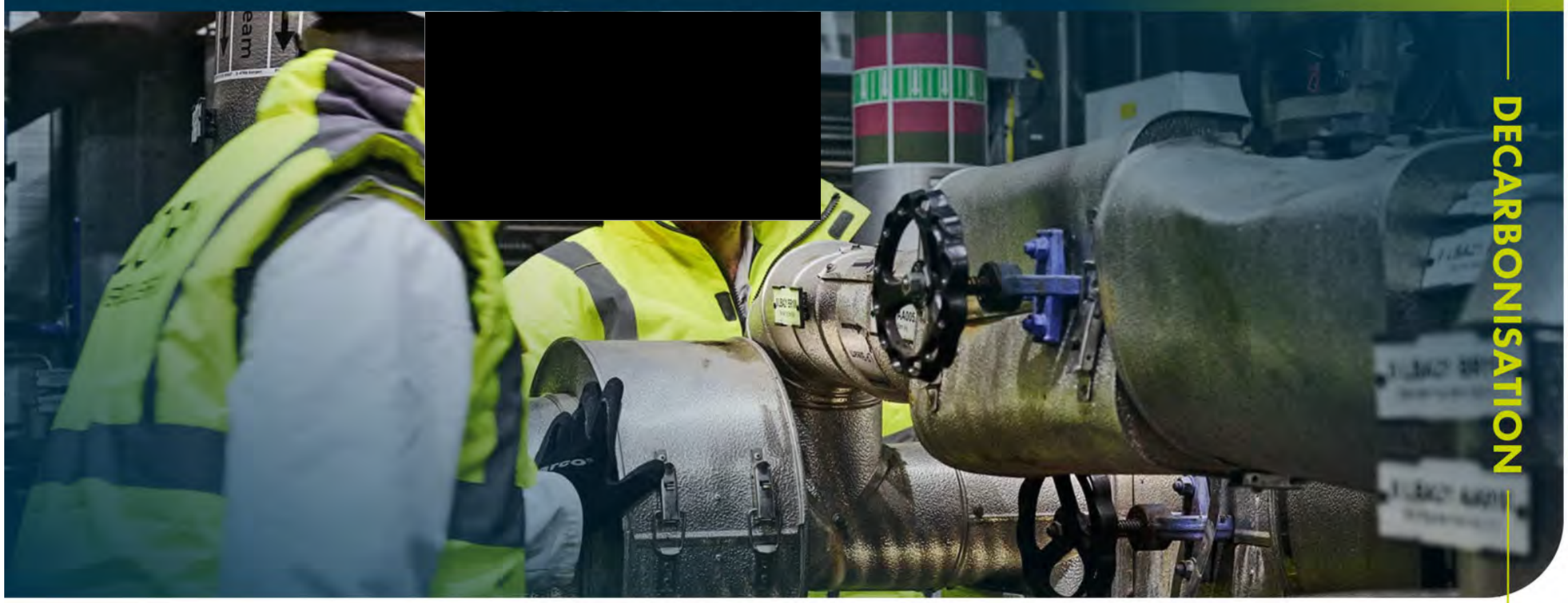

DECARBONISATION

SHARE YOUR FEEDBACK

You can give your feedback on our online web form, by leaving comments directly on to the consultation map or by attending one of our events. We will also be holding two webinars where you can learn more about the proposals and ask questions to the team.

You can also contact us directly via freephone, email or post.

Submit feedback using our online web form or leave comments on our consultation map

The deadline for comment on this introductory stage of consultation is 14 July 2023.

1. Do you have any comments or questions about Cory's decarbonisation proposals for our site in Belvedere?

Character Count: 7000

Enter your feedback

CONTINUE

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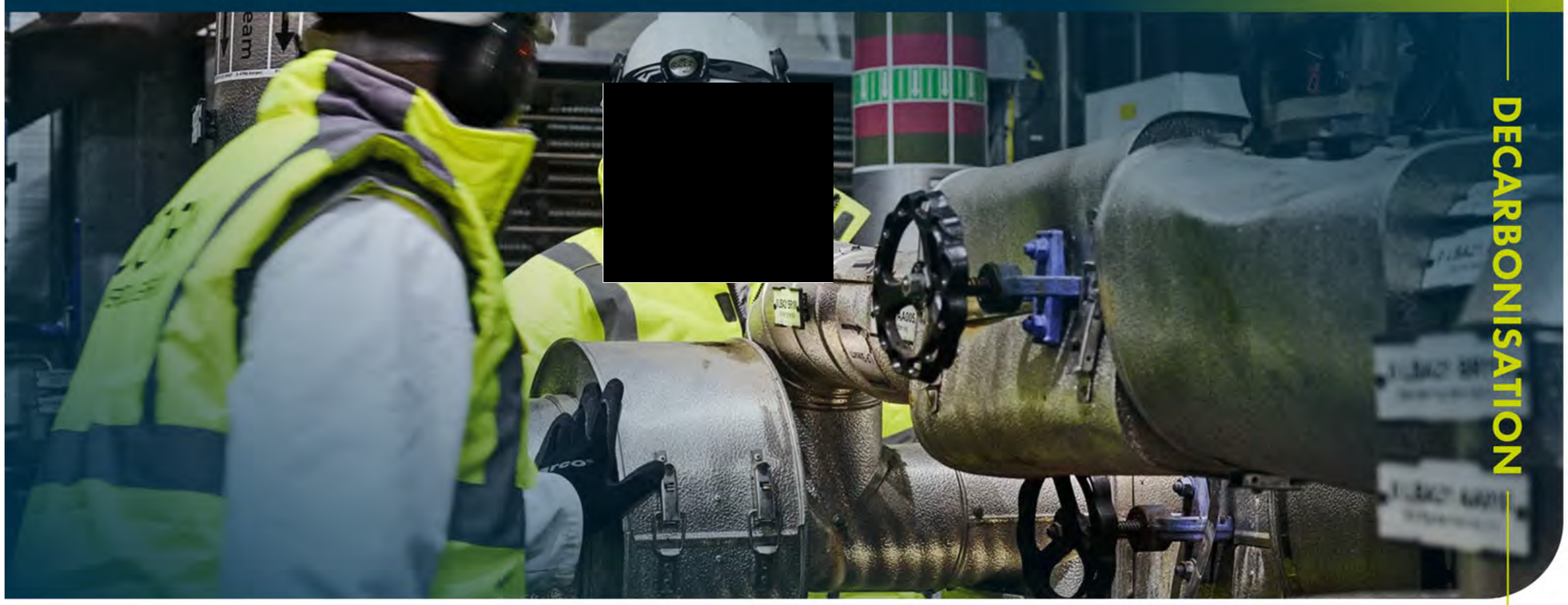

DECARBONISATION

FEEDBACK FORM

First name *

Enter your feedback

Last name *

Enter your feedback

Address

Enter your feedback

Postcode *

Enter your feedback

Telephone number

Enter your feedback

Email address

Enter your feedback

Do you represent an organisation? If so, which one?

Enter your feedback

Do you wish to be kept updated on the project?

○ Yes ○ No

← GO BACK CONTINUE →

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USING OUR CONSULTATION MAP

REGISTER

To give us your feedback on the project, you will need to register. Please provide us with your name, email, and postcode and tell us if you are responding on behalf of an organisation or as an individual.

USING OUR CONSULTATION MAP

REGISTER

To give us your feedback on the project, you will need to register. Please provide us with your name, email, and postcode and tell us if you are responding on behalf of an organisation or as an individual.

You will be sent an email to confirm your identity. Please click the link in the email to confirm. If you are not automatically logged in please click on login.

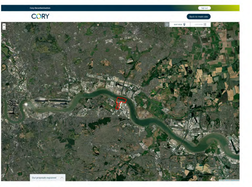
Click here to view our GDPR Policy on how we manage data for this project.

LOGIN

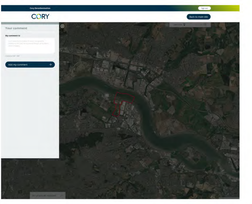
Visit the login page and enter your email and password.

ADD YOUR FEEDBACK

You can zoom and move the map around to the location you wish to leave feedback.



Click on the map and a panel will pop out to allow you to leave a comment at that point:



LIST VIEW

You can view a list of all of your feedback either on the map or using the 'list view':

FILTER VIEW

You can filter multiple feedback comments by theme if you assigned any.

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HOME
BACKGROUND
PROPOSALS
PROCESS
CONSULTATION FEEDBACK
GET IN TOUCH

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DECARBONISATION

GET IN TOUCH

GET IN TOUCH

If you have any further questions you can contact us directly via freephone, email or post.

Telephone: 0330 838 4254

Post: FREEPOST CORY CCS

Email: decarbonisation@corygroup.com

FEEDBACK PROGRESS

2/2 sections completed

REVIEW FEEDBACK

PROJECT FEEDBACK

We welcome your feedback on our plans to decarbonise our energy from waste facilities in Belvedere.

SUBMIT FEEDBACK

CORY

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London
EC2M 2EF

T: 0330 830 4254
E: decarbonisation@corygroup.co.uk

Cory is the trading name for each of the companies within the Cory Group, comprising Cory Topco Limited (registered company number 11385842) and its subsidiaries including Cory Environmental Holdings Limited, Cory Environmental Limited, Riverside Resource Recovery Limited, Riverside (Thames) Limited, Riverside Energy Park Limited, Cory Ship Repair Services Limited, and Cory Barking Operations Limited.

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All of the Cory Group companies in England with their registered offices at: 10 Dominion Street, Floor 5, London, EC2M 2EF

Privacy Policy - Cookie Policy

FEEDBACK PROGRESS
2/2 sections completed
REVIEW FEEDBACK

PRIVACY POLICY

PRIVACY POLICY FOR CORY DECARBONISATION

Cory Decarbonisation. (We) are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us or an authorised data processor acting on our behalf, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By accepting our Terms and Conditions and Terms of Use, you are providing your express consent for your personal data to be collected, handled, stored and used in accordance with the practices described in this policy.

For the purpose of the General Data Protection Regulation (GDPR), the data controller is Cory Decarbonisation. All personal data collected by us or on our behalf will be processed in accordance with the GDPR.

INFORMATION WE MAY COLLECT ABOUT YOU:

We may collect and process the following data about you:

- Your title
- Your name
- Your address
- Your postcode
- Your telephone number
- Your age range
- Your email
- The organisation you work for

INFORMATION YOU GIVE US

You may give us information about you by filling in forms on our site https://corydecarbonisation.co.uk/ (our site) or by corresponding with us by phone, e-mail or other methods. This includes information you provide when you register with Cory Decarbonisation, subscribe to our service, place an order, participate in social media functions, enter a competition, promotion or survey, visit our website and when you report a problem with our website. The information that we may request from you may include your name, address, e-mail address and phone number, financial and credit card information and personal description.

Information we collect about you when you visit our website. With regard to each of your visits to our site we may automatically collect the following information. By accepting these terms, you provide your express authority for this data to be collected and used by us:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; and
- page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

INFORMATION WE RECEIVE FROM OTHER SOURCES

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

CONSENT TO THE USE OF COOKIES.

For our website to function properly we use cookies. To obtain your valid consent for the use and storage of cookies in the browser you use to access our website and to properly document this we use a consent management platform: CookieFirst. This technology is provided by Digital Data Solutions BV, Plantage Middenlaan 42a, 1018 DH, Amsterdam, The Netherlands. Website: https://cookiefirst.com referred to as CookieFirst.

When you access our website, a connection is established with CookieFirst's server to give us the possibility to obtain valid consent from you to the use of certain cookies. CookieFirst then stores a cookie in your browser in order to be able to activate only those cookies to which you have consented and to properly document this. The data processed is stored until the predefined storage period expires or you request to delete the data. Certain mandatory legal storage periods may apply notwithstanding the aforementioned.

CookieFirst is used to obtain the legally required consent for the use of cookies. The legal basis for this is article 6(1)(c) of the General Data Protection Regulation (GDPR).

DATA PROCESSING AGREEMENT

We have concluded a data processing agreement with CookieFirst. This is a contract required by data protection law, which ensures that data of our website visitors is only processed in accordance with our instructions and in compliance with the GDPR.

SERVER LOG FILES

Our website and CookieFirst automatically collect and store information in so-called server log files, which your browser automatically transmits to us. The following data is collected:

- Your consent status or the withdrawal of consent
- Your anonymised IP address
- Information about your Browser
- Information about your Device
- The date and time you have visited our website
- The webpage url where you saved or updated your consent preferences
- The approximate location of the user that saved their consent preference
- A universally unique identifier (UUID) of the website visitor that clicked the cookie banner

PURPOSES FOR COLLECTING DATA

All data collected by us will be used for the lawful purposes of providing you with our services relating to the project. We will only ever process your personal data once you have provided your express consent for us to do so by accepting these terms.

Your data will be used for the purposes of providing services as set out in our terms of use. We will also use your data in relation to analytics, research, marketing and regulatory purposes and may provide your data to trusted third parties for the express purpose of carrying out these tasks.

YOUR RIGHTS AS A DATA SUBJECT

The GDPR conveys several rights to you as a data subject regarding the control, usage and storage of your data. In order to these rights are;

- we must provide you with a copy of your personal data that we hold on our records;
- request that we correct any inaccurate data held by us;
- request a copy of your personal data for the purposes of transferring it to another data controller;
- to object to the processing of your data by us for the purposes of direct marketing, used for scientific or historical research, a task carried out in the public interest or for a legitimate purpose carried out by us or an authorised third party; and
- to object to a decision made as a result of a solely automated process, such as profiling where such a decision may have a legal or other significant affect.

Where any such request is made by you, we will provide you with a response as soon as is practicable but in any event within 30 days from the data of receipt of your request. We may require you to confirm your identity prior to responding to any request received, where your identity cannot be verified we will reject your request. We will also contact any data processor or secondary data controller instructed by us to make sure your request is handled in accordance with the GDPR.

RIGHT TO BE FORGOTTEN

You have the right to be forgotten. At any time, you may contact us and make a formal request for your personal data as held by us to be deleted and erased from our records in accordance with the GDPR. Any such request must be made in writing and can be sent to us via post or by e-mail. Upon receiving your request, we will review our records, databases, word processing systems, computer hard drives, hard copy files, voice recordings, photographs, monitoring and CCTV records, internet logs, telephone records, back-up files and third party data processors' systems and delete your personal data within 30 days of your request. In the event that you do make such a request you will be agreeing to terminate your agreement with us and end your usage of our service immediately. This does not include data that we are legally obliged to keep a record of.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

Information you give to us

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to comply with any and all legal obligations for us to provide information to relevant authorities.
- to provide you with information about other goods and services that we offer which are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer and have provided your consent for us to permit selected third parties to use your data, we (or they) will contact you by electronic means. We will not use your data in this way, or pass your details on to third parties for marketing purposes, unless you give your express consent for us to do so;
- to notify you about changes to our service;
- to ensure that content from our website is presented in the most effective manner for you and for your computer.
- Where the law permits, all such data will be anonymised or pseudonymised before being supplied to an authorised third party or authority;

Information we collect about you

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- as part of our continuing commitment to remain GDPR compliant;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources

We may combine your information with information that we collect about you. We may use this information and the combined information for the purposes set out below (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 for a legitimate purpose.

Unless you express to us otherwise, we may share your information with selected third parties including:

Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

Analytics and search engine providers that assist us in the improvement and optimisation of our site.

Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

If Cory Decarbonisation or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Cory Decarbonisation, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the GDPR.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We endeavour to undertake audits of our data protection policies and procedures at regular intervals. This is so that we may identify and resolve any issues in our data handling procedures that may require review and updating. Where any such updates may affect your personal data, we will contact you to inform you of the relevant changes.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or by writing to us setting out your objection. You can also exercise the right at any time by contacting us.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The GDPR gives you the right to access information held about you. If you wish to access your information please contact the Data Protection Officer.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Cory Decarbonisation, 10 Dominion Street Floor 5 London EC2M 2EF.

CORY

HEAD OFFICE
10 Dominion Street
Floor 5
London
EC2M 2EF

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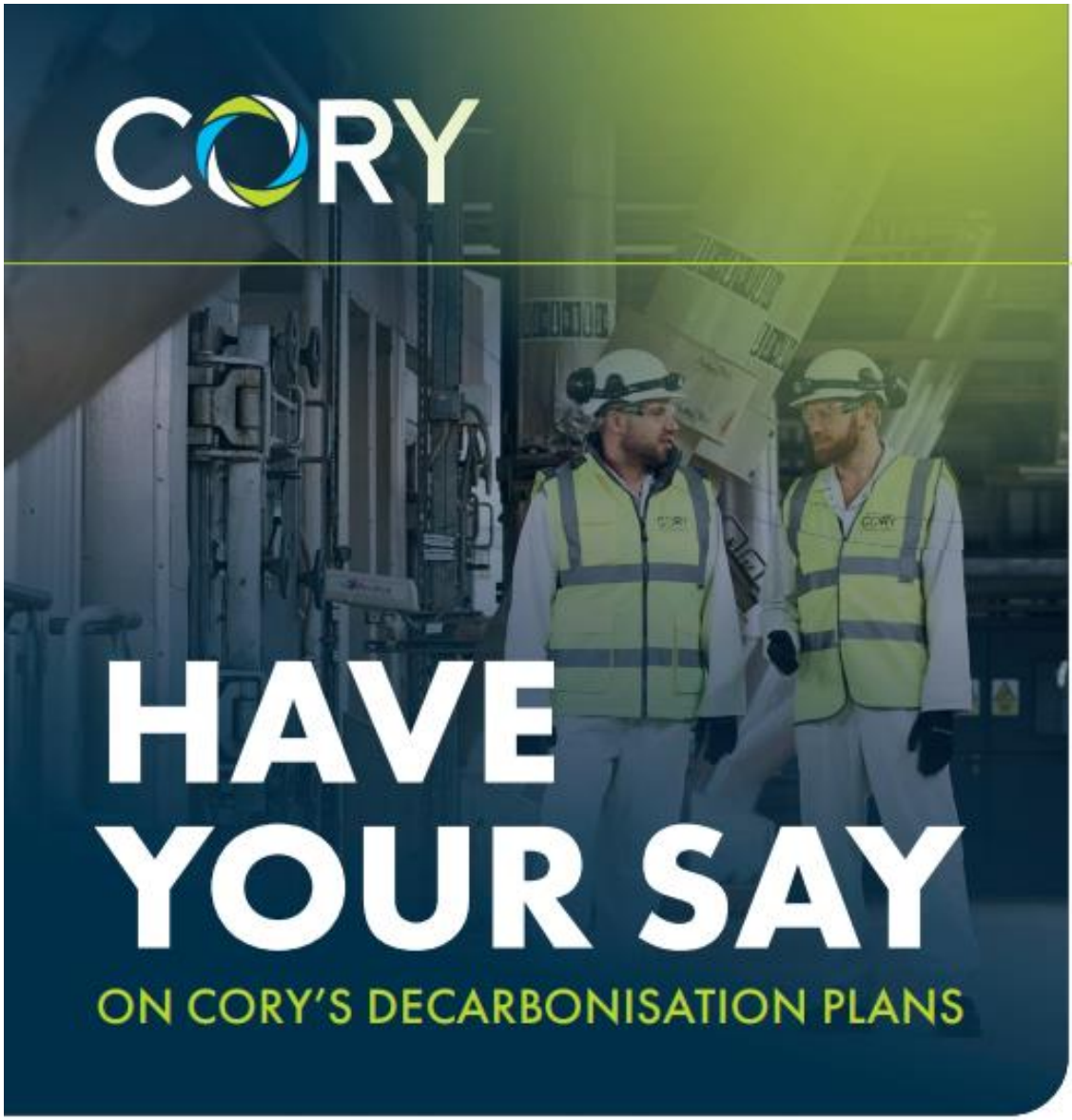
APPENDICES VOL. 4

APPENDIX B-9 – Non-statutory consultation factsheet



HAVE YOUR SAY

ON CORY'S DECARBONISATION PLANS

DECARBONISATION

We're asking for your views on Cory's plans to capture the carbon dioxide emitted at our energy from waste facilities in Belvedere.

We want to make sure that our local community is fully consulted, and are sharing early information about the project ahead of the formal statutory consultation later this year.

This introductory consultation will run from **Monday 05 June to Friday 14 July 2023**. There will be further opportunities to have your say as the project progresses.

We are proud to provide an important service for our local communities by providing reliable, efficient, and safe waste management services and diverting waste from landfill. However, we need to reduce our carbon impact and get to net zero.

Carbon Capture and Storage (CCS) is the leading technological approach for energy from waste (EfW) plants to significantly reduce their carbon dioxide (CO_2) emissions.

CORY

OUR DECARBONISATION PROJECT

The UK Government has set a legally-binding target for the country to reach net zero emissions by 2050 to avoid the worst impacts of climate change. All parts of the UK economy must work to decarbonise by this time.

CAPTURING CARBON

Our planned CCS project is an important addition to our current and in-development EfW facilities in Belvedere: Riverside 1 and Riverside 2.

This project will allow us to capture carbon dioxide emissions from these facilities and transport it by ship for safe storage deep under the North Sea in depleted oil and gas reservoirs or saline aquifers.

This technology would allow us to capture up to 95% of the carbon dioxide emissions from our two energy from waste facilities, c.1.3 million tonnes. Combined with the high proportion of biogenic carbon (carbon dioxide absorbed by vegetation as it grows) in the waste that we receive, we are proud to say that this project could make our EfW operations at Belvedere carbon negative.

Essentially, this means that we will be removing more CO_2 from the atmosphere than we emit.

HELPING THE UK TO REACH NET ZERO

Our plans have the potential to capture c.1.3 million tonnes of CO_2 every year by 2030, decarbonising our EfW process and contributing to the UK's net zero targets by delivering negative carbon emissions.

The importance of our decarbonisation project has been recognised by the UK Government. In 2022 the Department of Business, Energy and Industrial Strategy (now known as the Department for Energy Security and Net Zero) designated our plans as being 'nationally significant'.

Our decarbonisation project also includes exploring the potential for producing low carbon hydrogen at our site, using the electricity from our EfW facilities.

MAXIMISING OUR USE OF THE RIVER

The river sits at the heart of our operations and our use of tugs and barges to transport the majority of the waste we process takes around 100,000 truck journeys off the roads each year.

The location of our Riverside facilities on the bank of the Thames also provides us with readily available infrastructure for transporting the CO_2 we capture; using a purpose-built new jetty we will be able to safely transport the carbon dioxide by ship to a Transport & Storage Cluster so it can be stored under the seabed. These new jetty facilities could also be used for hydrogen-related purposes, such as to fuel barges.

CORY

CAPTURING CARBON

c.1.3M TONNES

OUR PLANNED CCS PROJECT WILL BE ABLE TO CAPTURE C.1.3 MILLION TONNES OF CARBON DIOXIDE PER YEAR BY 2030

OFFSHORE STORAGE

CO_2 WILL BE SAFELY TRANSPORTED FOR STORAGE OFFSHORE

SAFELY STORED

CO_2 WILL BE SAFELY STORED >1KM BELOW THE SEABED

2040

CORY'S NET ZERO TARGET

2050

THE UK GOVERNMENT'S NET ZERO TARGET

70%

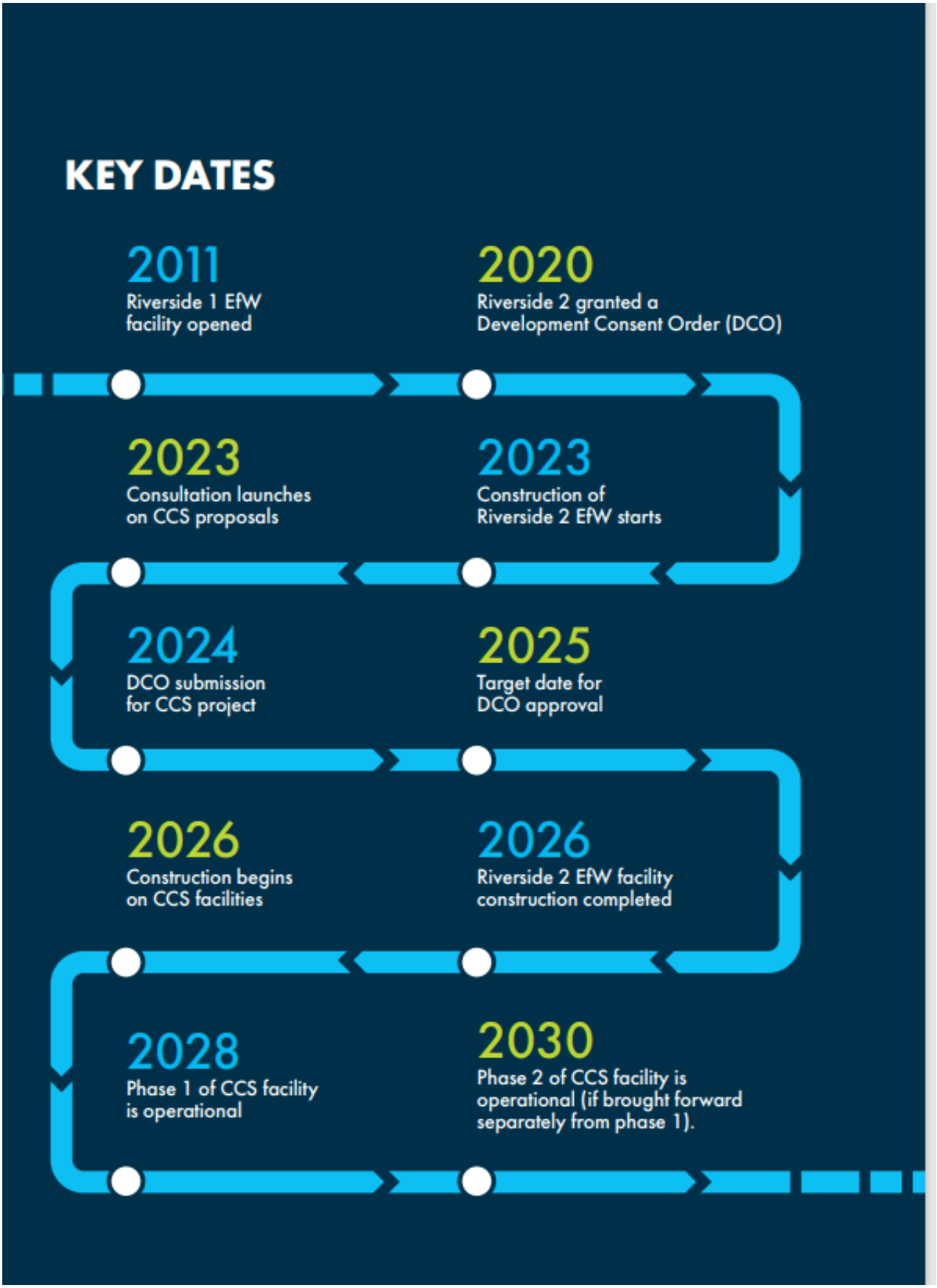
OF LOCAL AUTHORITIES ARE AIMING FOR NET ZERO BY 2040 OR EARLIER

ASK US A QUESTION AND HAVE YOUR SAY

For more information on the project, please visit corydecarbonisation.co.uk

Telephone: 0330 838 425 Email: decarbonisation@corygroup.co.uk
Post: FREEPOST CORY CCS Online: corydecarbonisation.co.uk

THE DEADLINE FOR COMMENT IS 14 JULY 2023


KEY DATES
2011
Riverside 1 EfW facility opened
2020
Riverside 2 granted a Development Consent Order (DCO)
2023
Consultation launches on CCS proposals
2023
Construction of Riverside 2 EfW starts
2024
DCO submission for CCS project
2025
Target date for DCO approval
2026
Construction begins on CCS facilities
2026
Riverside 2 EfW facility construction completed
2028
Phase 1 of CCS facility is operational
2030
Phase 2 of CCS facility is operational (if brought forward separately from phase 1).

APPENDICES VOL. 4

APPENDIX B-10 – Non-statutory consultation launch media release (05 June 2023)

[redacted]
Sent: Monday, June 5, 2023 10:15 AM
Subject: NEWS; Cory launches early consultation on decarbonisation plans

Good morning

Please see below a press release from Cory Group, one of the UK's leading waste management and recycling companies, who today announce the launch of their early consultation on decarbonisation plans for its energy from waste (EfW) facilities in Belvedere.

An image is also attached for use.

Kind regards

[redacted]

Press release
FOR IMMEDIATE RELEASE
5 June 2023

Cory launches early consultation on decarbonisation plans

- Proposal includes technology to capture c.1.3 million tonnes of carbon dioxide every year, by 2030
- Project will be instrumental for achieving Cory's net zero emissions target
- Six weeks of consultation will run from Monday 5 June to Friday 14 July

Local people are being invited to make the most of an early opportunity to have their say on Cory's plans to decarbonise its energy from waste (EfW) facilities in Belvedere.

Cory's industry-leading project includes installing technology that will capture the carbon dioxide emitted by its existing and in-development EfW facilities. The proposal also includes exploring the potential for producing low carbon hydrogen onsite.

This introductory consultation will run from Monday 5 June to Friday 14 July 2023 and there will be opportunities to speak about the project with the Cory team at pop-up events and webinars. Feedback and comments on the proposals can also be submitted by email, post or via the website, and there will be further opportunities for local people to have their say as the project progresses.

In total, Cory's project has the potential to capture c.1.3 million tonnes of carbon dioxide every year by 2030, decarbonising the EfW process and contributing to the UK's net zero targets by delivering negative carbon emissions. This will enable Cory to decarbonise its business and achieve its goal of reaching net zero emissions by 2040.

Commenting on the announcement, Richard Wilkinson, project director at Cory, said: "We are already proud to be delivering an important service to our local communities by providing reliable, efficient, and safe waste management services that divert waste from landfill.

"However, we want to go further to reduce our carbon impact and become net zero in our operations. Installing carbon capture and storage technology is recognised as being the best approach for EfW facilities to reduce their carbon dioxide emissions, and this early consultation is an important first step in the process."

The consultation is open from Monday 5 June to Friday 14 July. To find out more, share feedback, or register for a webinar, please visit www.corydecarbonisation.co.uk. Feedback can also be sent by mail to FREEPOST CORY CCS or by email to decarbonisation@corygroup.co.uk.

Ends

APPENDICES VOL. 4

APPENDIX B-11 – Local and regional press list

- News Shopper
- South London Press
- ThisWeek London
- London World
- Bexley Times
- East London News

APPENDICES VOL. 4

APPENDIX B-12 – Ends Waste & Bio Energy coverage (07 July)

Cory begins early consultation on EfW carbon capture plans

Maxine Perella 07 Jun 2023

Cory has launched what it calls an "early consultation" on plans to decarbonise its energy-from-waste facilities in Belvedere, south London.

Cory says the project has the potential to capture around 1.3 million tonnes of CO2 form its Belvedere facilities each year by 2030. Photograph: Daniel Leal/Getty Images

The proposals include installing technology to capture the CO2 emitted by the company's existing and in-development facilities, Riverside One and Riverside Two, and storing it permanently under the North Sea in depleted oil and gas fields.

Cory is also looking to explore the potential for producing low carbon hydrogen on-site using the electricity generated from the facilities.

The planned development would see the flue stacks on Riverside One and Riverside Two modified so that emissions can be redirected to the carbon capture plant. Once within the plant, the flue gases would undergo chemical absorption to separate out the CO2.

Once captured and liquified, the CO2 would be stored on-site, in above-ground pressure vessels, before being transported by ship along the river Thames for storage.

Cory says the project has the potential to capture around 1.3 million tonnes of CO2 each year by 2030 and help to achieve its goal of reaching net zero emissions by 2040.

Commenting on the announcement, Richard Wilkinson, project director at Cory, said: "We want to go further to reduce our carbon impact and become net zero in our operations.

"Installing carbon capture and storage technology is recognised as being the best approach for EfW facilities to reduce their carbon dioxide emissions, and this early consultation is an important first step in the process."

The consultation, which began earlier this month will run for six weeks and close on 14 July. A further consultation is expected later in the year, which will provide more information about the proposals.

Cory says the feedback from this will help inform its application for a development consent order, which if granted, could pave the way for construction to start in 2026 with a target of the initial phase of the carbon capture plant being operational by 2028.

This week it was also revealed that HZI has applied for a trade effluent permit to cover its work on the under-construction Riverside Two facility.

APPENDICES VOL. 4

APPENDIX B-14 – Non-statutory stakeholder distribution list

Members of Parliament:

- Abena Oppong-Asare
- Jon Cruddas
- Sir David Evennett
- Matthew Pennycook

Local Councillors:

- Councillor Zainab Asunramu
- Councillor Larry Ferguson
- Councillor Mabel Ogundayo"
- Councillor Esther Amaning
- Councillor Daniel Francis
- Councillor Sally Hinkley
- Councillor Stefano Borella
- Councillor Chris Ball"
- Councillor Nicola Taylor
- Councillor Baljeet Gill
- Councillor Wendy Perfect
- Councillor Brian Bishop
- Councillor Howard Jackson"
- Councillor Anna Day
- Councillor Felix Di Netimah
- Councillor Geraldene Lucia-Hennis
- Councillor Melvin Seymour
- Councillor Clement Quaqumey
- Councillor Matthew Davis
- Councillor Chris Shippam
- Councillor Richard J Wells
- Councillor Alina Gaskin
- Councillor Kelly Grehan
- Councillor Darren Povey

Community Groups:

- River Thames Society
- Belvedere Community Forum
- Bexley Natural Environment Forum

Keep in Touch: this communication also went out to members of the public who had previously expressed a desire to be kept up to date on Cory's work in the area.

APPENDICES VOL. 4

APPENDIX B-15 – Ward Cllrs, MPs, Community Group and Keep in Touch email notification of reminder of deadline for consultation close (07 July 2023)

From: Decarbonisation <decarbonisation@corygroup.co.uk>
Sent: [redacted]
To: [redacted]
Subject: Cory's Decarbonisation Project – final call for feedback to Stage One Consultation

Dear Cllr Hinkley

I am writing to let you know that the deadline for submitting feedback to the first stage of consultation on Cory's decarbonisation project **closes at 11.59pm on Friday 14 July 2023.**

Our proposed project will see carbon capture and storage technology built at our energy from waste facility (EfW) in Belvedere, with **the potential to capture c.1.3 million tonnes of carbon dioxide (CO_2) every year by 2030.**

This will help to significantly decarbonise our operations by capturing over 90% of the CO_2 emissions that we produce during the waste management process at our current and in-construction EfW plants. The project will also contribute to achieving the UK's net zero targets.

The aim of this initial consultation period is to explain our early proposals, giving people the opportunity to express their views and **help shape our plans.** There will be further consultation later in the year.

How to tell us what you think

There are a number of ways you can submit feedback to this consultation:

- Email us at decarbonisation@corygroup.com
- Fill out our online feedback form at: https://corydecarbonisation.co.uk/consultation-feedback/form/
- Write to FREEPOST CORY CCS, no stamp needed

If you have any questions on this consultation, or the project itself, please call us on 0330 838 4254 or visit our website at corydecarbonisation.co.uk.

Kind regards

[redacted]

Richard Wilkinson
Project Director

Decarbonisation
Decarbonisation
CORY

APPENDICES VOL. 4

APPENDIX B-16 – Pictures from in person events

CORY
DECARBONISATION
HAVE YOUR SAY
ON CORY'S DECARBONISATION PLANS
We're asking for your views on Cory's plans to capture the carbon dioxide emitted at our energy from waste facilities in Belvedere. Our decarbonisation project also includes exploring the potential for producing low carbon hydrogen onsite.
This pre-statutory consultation will run from Monday 05 June to Friday 14 July 2023. There will be further opportunities to have your say as the project progresses.
Please visit our website, corydecarbonisation.co.uk, to find out more about our proposals and provide us with your comments, or fill in a FREEPOST card and send it back to us.
ASK US A QUESTION AND HAVE YOUR SAY
Telephone: 0330 838 4254
Email: decarbonisation@corygroup.co.uk
Post: FREEPOST CORY CCS
Online: corydecarbonisation.co.uk
THE DEADLINE FOR COMMENT IS 14 JULY 2023
cleaning station
£2 or less
ASDA

CORY
DECARBONISATION
HAVE YOUR SAY
ON CORY'S DECARBONISATION PLANS
ASK US A QUESTION AND HAVE YOUR SAY
Telephone: 0330 838 4254
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Online: corydecarbonisation.co.uk
ASDA

APPENDICES VOL. 4

APPENDIX B-17 – Non-statutory consultation material – large scale panel

CORY

DECARBONISATION

HAVE YOUR SAY

ON CORY'S DECARBONISATION PLANS

We're asking for your views on Cory's plans to capture the carbon dioxide emitted at our energy from waste facilities in Belvedere. Our decarbonisation project also includes exploring the potential for producing low carbon hydrogen onsite.

This introductory consultation will run from **Monday 05 June to Friday 14 July 2023**. There will be further opportunities to have your say as the project progresses.

Please visit our website, **corydecarbonisation.co.uk**, to find out more about our proposals and provide us with your comments, or fill in a **FREEPOST card** and send it back to us.

ASK US A QUESTION AND HAVE YOUR SAY

Telephone: 0330 838 4254
Email: decarbonisation@corygroup.co.uk
Post: FREEPOST CORY CCS
Online: corydecarbonisation.co.uk

THE DEADLINE FOR COMMENT IS 14 JULY 2023

APPENDICES VOL. 4

APPENDIX B-18 – Non-statutory consultation material – feedback postcard

CORY

POSTAGE PAID

FREEPOST CORY CCS

Do you have any comments or questions about Cory's decarbonisation proposals for our site in Belvedere?

DECARBONISATION

We will also be hosting two webinars from 6pm to 7pm on Wednesday 28 June and Tuesday 4 July. To register, please visit our website at corydecarbonisation.co.uk

ASK US A QUESTION AND HAVE YOUR SAY

Telephone: 0330 838 4254
Email: decarbonisation@corygroup.co.uk
Post: FREEPOST CORY CCS
Online: corydecarbonisation.co.uk

THE DEADLINE FOR COMMENT IS 14 JULY 2023

APPENDICES VOL. 4

APPENDIX B-19 – Recording of non-statutory consultation webinar

INTRODUCTION TO THE PROJECT

Cory has ambitious plans to decarbonise our waste management processes by capturing the carbon dioxide emitted at our EfW facilities in Belvedere and storing it permanently and safely under the North Sea in depleted oil and gas fields. Our project also includes exploring the potential for producing low carbon hydrogen at our site, using the electricity from our EfW facilities.

Our plans have the potential to capture c.1.3 million tonnes of carbon dioxide every year by 2030, decarbonising our EfW process, and reducing the carbon dioxide emissions of the waste we process for households and businesses in London and the South East. The project will also help contribute to achieving the UK's net zero targets.

PROJECT TIMELINE

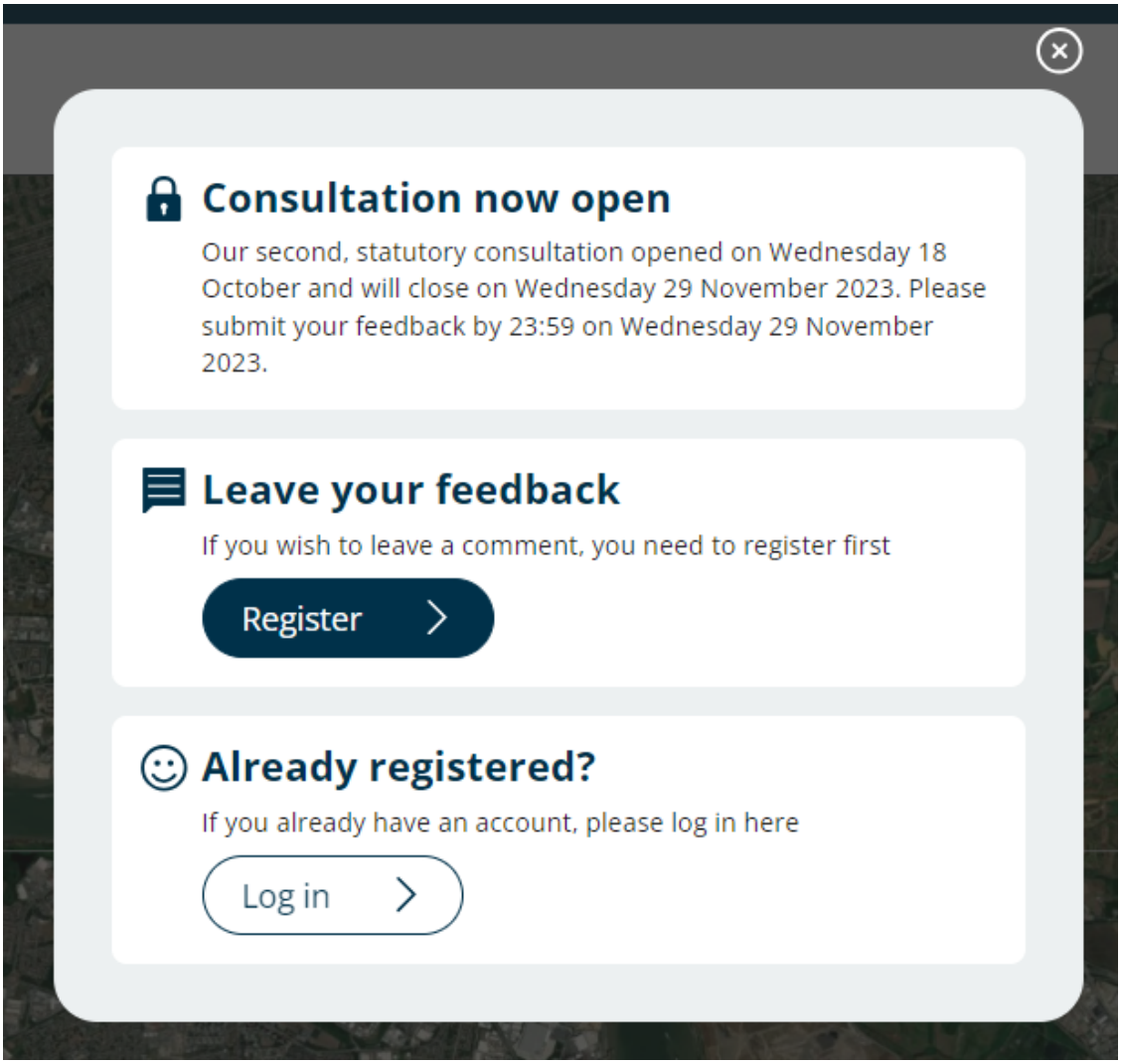
VIEW TIMELINE

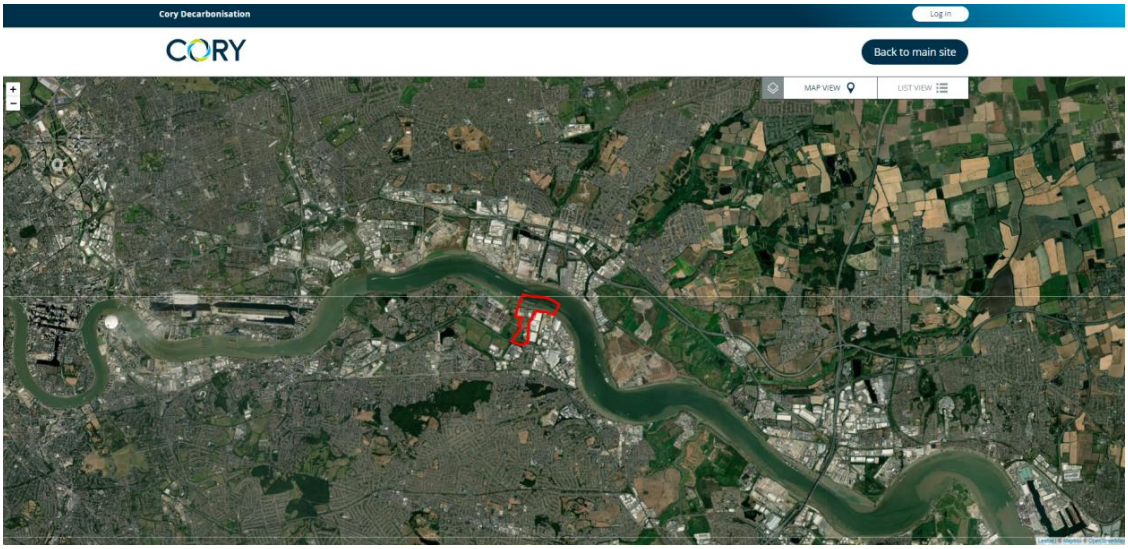
We hosted a webinar on Wednesday 28th June at 6pm. Please click here to view the recording.

WATCH WEBINAR FROM 28 JUNE HERE

APPENDICES VOL. 4

APPENDIX B-20 – Interactive map on website


Consultation now open
Our second, statutory consultation opened on Wednesday 18 October and will close on Wednesday 29 November 2023. Please submit your feedback by 23:59 on Wednesday 29 November 2023.
Leave your feedback
If you wish to leave a comment, you need to register first
Register
Already registered?
If you already have an account, please log in here
Log in


Cory Decarbonisation
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MAP VIEW
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APPENDICES VOL. 4

APPENDIX B-21 – Email inviting 24 local councillors to attend presentation on proposed scheme (08 June)

From: Decarbonisation <decarbonisation@corygroup.co.uk>
Sent: 08 June 2023 12:41
To: [redacted]
Subject: Launch of Cory's non-statutory consultation

Dear Councillor Asunramu

Further to my previous email dated 05 June, I wanted to let you know that the Cory team will be giving a short presentation on this project, followed by Q&A, at the Belvedere Community Centre between 18.00 and 19.30 on Thursday 15 June.

If you would like to attend this presentation please register you interest by calling us on 0330 838 4254 or emailing us on decarbonisation@corygroup.co.uk.

Kind regards

[redacted]
Richard Wilkinson
Project Director
Decarbonisation
Decarbonisation
CORY
Floor 5, 10 Dominion Street, London, EC2M 2EF
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