



# ENVIRONMENTAL STATEMENT: 6.1 CHAPTER 4: EIA METHODOLOGY

DECARBONISATION

## Cory Decarbonisation Project

PINS Reference: EN010128

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## 4. EIA METHODOLOGY

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### 4.1. INTRODUCTION

- 4.1.1. This chapter sets out the overall approach to the EIA for the Proposed Scheme. A detailed overview of the methodology adopted for each technical topic is provided within the respective technical chapters of this ES. The approach to the assessment has been informed by current best practice guidance, as set out within the Planning Inspectorate Advice Note Seven<sup>1</sup>.
- 4.1.2. This ES contains the information specified in Regulation 14(2) (a)-(f) and Schedule 4 of the EIA Regulations<sup>2</sup> as set out in **Table 1-1** of **Chapter 1: Introduction (Volume 1)**.

### 4.2. RELEVANT EXPERIENCE

- 4.2.1. In line with Regulation 14(4)(a) of the EIA Regulations<sup>2</sup>, this ES has been prepared by a suitably qualified project team. Details of the competent project team, with associated roles and expertise are provided in **Appendix 4-1: Relevant Expertise and Competency (Volume 3)**.
- 4.2.2. The Institute of Environmental Management and Assessment (IEMA) has awarded WSP the EIA Quality Mark in recognition of our commitment to excellence in EIA activities. WSP have continued to maintain this following annual examination in relation to their products, staff, innovation, and promotion of EIA practice within the industry. Furthermore, each chapter of this ES has been prepared by an individual who is a suitably qualified expert with regard to each technical topic.

### 4.3. STRUCTURE OF THIS ES

- 4.3.1. This ES consists of four volumes:
- Volume 1: Main Text
  - Volume 2: Figures
  - Volume 3: Technical Appendices
  - Volume 4: Non-Technical Summary
- 4.3.2. The chapters of this ES are numbered as follows:
- Chapter 1: Introduction
  - Chapter 2: Site and Proposed Scheme Description
  - Chapter 3: Consideration of Alternatives
  - Chapter 4: EIA Methodology
  - Chapter 5: Air Quality
  - Chapter 6: Noise and Vibration

- Chapter 7: Terrestrial Biodiversity
- Chapter 8: Marine Biodiversity
- Chapter 9: Historic Environment
- Chapter 10: Townscape and Visual<sup>1</sup>
- Chapter 11: Water Environment and Flood Risk
- Chapter 12: Climate Resilience
- Chapter 13: Greenhouse Gases
- Chapter 14: Population, Health and Land Use
- Chapter 15: Socio-economics
- Chapter 16: Materials and Waste
- Chapter 17: Ground Conditions and Soils
- Chapter 18: Landside Transport
- Chapter 19: Marine Navigation
- Chapter 20: Major Accidents and Disasters
- Chapter 21: Cumulative Effects
- Chapter 22: Summary of Effects

#### 4.4. CONSULTATION AND ENGAGEMENT

- 4.4.1. As part of the EIA process, consultation is ongoing with a range of statutory consultees and non-statutory consultees.
- 4.4.2. Further detail about all the consultation undertaken for the Proposed Scheme is provided in the **Consultation Report (Document Reference 5.1)**. A brief summary of consultation and engagement undertaken to date in relation to the EIA for the Proposed Scheme follows.

#### NON-STATUTORY CONSULTATION AND ENGAGEMENT

- 4.4.3. Non-statutory consultation and engagement has been ongoing since the 17<sup>th</sup> June 2022 when the Proposed Scheme was first introduced to LBB.
- 4.4.4. Furthermore, an introductory non-statutory consultation period was open to the public between 5<sup>th</sup> June and 14<sup>th</sup> July 2023 to introduce the project; with a dedicated website<sup>3</sup> launched on 5<sup>th</sup> June.
- 4.4.5. Those who are not directly affected by the Proposed Scheme but may still have an interest in it have had information made available through the website and Cory social media. The Proposed Scheme and its construction will have an impact on the owners of land within the Site, through both the permanent acquisition of land and temporary

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<sup>1</sup> Chapter 10: Townscape and Visual (Volume 1) is accompanied by Appendix 10-3: Arboricultural Impact Assessment (Volume 3).

possession of land. Landowners, lessees, tenants, occupiers and those with an interest in the land affected are therefore a significant group of stakeholders, and the Applicant has been seeking to engage with them to reach voluntary agreements wherever possible, as reported upon in the **Schedule of Powers Sought (Document Reference 4.4)**.

## EIA SCOPING CONSULTATION

- 4.4.6. The Applicant submitted an EIA Scoping Report<sup>4</sup> on the 18<sup>th</sup> April 2023. In response, the EIA Scoping Opinion<sup>5</sup> was received by the Applicant from the Planning Inspectorate on behalf of the Secretary of State on 26<sup>th</sup> May 2023, including formal responses from statutory consultees.
- 4.4.7. A list of the consultees contacted by the Planning Inspectorate as part of the EIA Scoping process is provided within the EIA Scoping Opinion<sup>5</sup>. The EIA Scoping Opinion<sup>5</sup> has been considered in the preparation of this ES. Further details on how the responses included in Scoping Opinion<sup>5</sup> have been addressed by the Applicant are provided within **Appendix 4-2: EIA Scoping Opinion Responses (Volume 3)**.
- 4.4.8. As part of the EIA process, consultation is ongoing with both statutory and non-statutory consultees.

## STATUTORY CONSULTATION

- 4.4.9. The DCO process requires statutory consultation to be undertaken prior to the submission of an application for development consent. Statutory consultation took place between 16<sup>th</sup> October and 29<sup>th</sup> November 2023.
- 4.4.10. As required under the PA2008<sup>6</sup>, there were three elements to the statutory consultation:
- Section 42, consultation with prescribed consultees, local authorities, landowners and others with interests in land and people who may be able to make a relevant claim in connection with the Proposed Scheme;
  - Section 47, consultation with the local community in accordance with the Statement of Community Consultation (SoCC); and
  - Section 48, the requirement to publish statutory notices of the proposed application for development consent in local and national newspapers and the London Gazette and served on statutory consultees identified under Section 42 of PA2008<sup>6</sup> and by the Planning Inspectorate.
- 4.4.11. A PEIR<sup>7</sup> was produced to support the statutory consultation. The PEIR<sup>7</sup> was produced to help consultees reach an informed view of the likely significant environmental effects of the Proposed Scheme.

- 4.4.12. Comments received by the Applicant from statutory consultees, the local community and the general public are detailed further in the **Consultation Report (Document Reference 5.1)**. These comments have been considered in the preparation of this ES. Responses to comments provided in the statutory consultation process regarding Chapter 1: Introduction to Chapter 4: EIA Methodology of the PEIR<sup>7</sup> are recorded in **Table 4-1** of this chapter. Responses to comments regarding Chapters 5: Air Quality to Chapter 21: Cumulative effects of the PEIR<sup>7</sup> are recorded in **Section X.3 of Chapter 5: Air Quality (Volume 1) to Chapter 21: Cumulative Effects (Volume 1)**, where relevant.
- 4.4.13. Any consultation comments received after the 15<sup>th</sup> March 2024 are responded to the **Consultation Report (Document Reference 5.1)**.

### **ONGOING STAKEHOLDER ENGAGEMENT**

- 4.4.14. Engagement with stakeholders will be ongoing following the application for development consent in order to reach agreed Statements of Common Ground and relevant agreements.

**Table 4-1: Summary of the Statutory Consultation Comments (Chapter 1: Introduction to Chapter 4: EIA Methodology)**

Statutory Consultee	Response
<p><b>London Borough of Bexley</b></p>	
<p><i>“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.”</i></p> <p><i>“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.”</i></p>	<p>The interaction of the Proposed Scheme with land use designations is discussed in the <b>Planning Statement (Document Reference 5.2)</b>. The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> and explains how these designations have been taken into account. The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout.</p>
<p><i>“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</i></p>	<p><b>Chapter 3: Consideration of Alternatives (Volume 1)</b> and the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> 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.</p>

Statutory Consultee	Response
<p><i>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.</i></p> <p><i>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?”</i></p>	<p>Ecological enhancement that will be achieved through onsite and offsite mitigation measures is set out in <b>Chapter 7: Terrestrial Biodiversity (Volume 1)</b> and the <b>Outline LaBARDS (Document Reference 7.9)</b> that will be secured through provisions of the DCO and Section 106 Agreement.</p>



Statutory Consultee	Response
<p><i>“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.”</i></p>	<p><b>Chapter 3: Consideration of Alternatives (Volume 1)</b> 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. The <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> 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.</p> <p>The Proposed Scheme is not anticipated to have significant effects on biodiversity, as stated in <b>Chapter 7: Terrestrial Biodiversity (Volume 1)</b>. Additionally, the Proposed Scheme will achieve at least a 10% net gain for biodiversity, as set out in <b>Appendix 7-1: Biodiversity Net Gain Report (Volume 3)</b>.</p> <p>The <b>Outline LaBARDS (Document Reference 7.9)</b> presents the proposed approach to mitigation, with detailed measures secured through the provisions of the DCO.</p>
<p><i>“The greenhouse gasses produced by the carbon capture facility itself during the processing of capturing of carbon, should be clearly set out.”</i></p>	<p>GHG Emissions are discussed <b>Chapter 13: Greenhouse Gases (Volume 1)</b>.</p>

Statutory Consultee	Response
<p><i>“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.”</i></p>	<p><b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> covers the intentions for wastewater discharge, in relation to solvent usage and the proposals for dealing with waste solvent.</p>
<p><b>CBRE on behalf of the Peabody Trust</b></p>	
<p><i>“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.”</i></p>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for each of the Carbon Capture Facility and Proposed Jetty is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> and <b>Jetty Site Alternatives Report (Document Reference 7.6)</b> respectively. The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout within the chosen Carbon Capture Facility development zone.</p>
<p><b>CLdN in relation to Ford Dagenham</b></p>	
<p><i>“We note that the alternative chapter of the PEIR does not address alternative designs, including reducing the length of the jetty. This in our view a flaw in design development and assessment of the Project, particularly when the impacts on navigation of the proposed</i></p>	<p><b>Chapter 3: Consideration of Alternatives (Volume 1)</b> describes the optionality for types of arrangement for the Proposed Jetty, concluding with the position selected within the River Thames. The options considered are shown on <b>Figure 3-5: Proposed Jetty Arrangement Alternatives (Volume 2)</b>. The site assessment</p>

Statutory Consultee	Response
<p><i>design are still unknown as detailed navigation simulations have not been undertaken.”</i></p>	<p>process for the Proposed Jetty is presented in the <b>Jetty Site Alternatives Report (Document Reference 7.6)</b>.</p> <p>Further information on the Proposed Jetty, potential navigational risks posed and associated mitigation measures are presented in <b>Chapter 19: Marine Navigation (Volume 1)</b> and <b>Appendix 19-1: Preliminary Navigation Risk Assessment (Volume 3)</b> which concludes that for the operation phase the residual assessment of risk resulted in two hazards scoring as tolerable if deemed to be ALARP, and the remaining hazards falling within the acceptable scoring range.</p>
<p><b>Creekside Developments</b></p>	
<p><i>“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’.”</i></p>	<p><b>Chapter 1: Introduction (Volume 1)</b> confirms the decision to not proceed with the hydrogen element nor the battery energy storage system of the Proposed Scheme.</p>
<p><i>“There is some acknowledgement 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</i></p>	<p>This ES has considered to the latest versions of the EN-1<sup>14</sup> designated by the Secretary of State of DESNZ in January 2024. As per EN-1<sup>14</sup>, this Proposed Scheme is considered under Section 104 of the PA2008<sup>6</sup>.</p>

Statutory Consultee	Response
<p><i>the project promoter. As has been noted, these points in this context are in practise very important.”</i></p>	
<p><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).”</i></p>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility development zone is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b>. The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout within the chosen development zone.</p> <p>As stated in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>, 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. 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.</p> <p>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 <b>Chapter 7:</b></p>

Statutory Consultee	Response
	<p><b>Terrestrial Biodiversity (Volume 1)</b> and the <b>Outline LaBARDS (Document Reference 7.9)</b>.</p>
<p><i>“It is not clear whether there has been proper disaggregation of the elements of the proposed development in considering alternatives.”</i></p>	<p><b>Chapter 3: Consideration of Alternatives (Volume 1)</b> examines a range of potential site options, layouts and, pertinently, technologies. The consideration of various technologies including solvent types, emission points and cooling options demonstrates a clear disaggregation of the elements of the Proposed Scheme.</p>
<p><b>Dartford Borough Council</b></p>	
<p><i>“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.”</i></p>	<p>A breakdown of the indicative construction programme can be found in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>. 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.</p> <p>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 CO<sub>2</sub> 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</p>

Statutory Consultee	Response
	transport for the construction of the Proposed Scheme will not result in significant effects on the local road network, as set out in <b>Chapter 18: Landside Transport (Volume 1)</b> .
<b>Environment Agency</b>	
<i>“Inclusion of the Thame Water land (East Paddock) within the proposed ground raising is seemingly within the Crossness nature reserve boundary.”</i>	As described in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> and <b>Chapter 3: Consideration of Alternatives (Volume 1)</b> the East Paddock is required for the Carbon Capture Plant(s). The <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> describes the site assessment process undertaken to select the location for the whole Carbon Capture Facility.
<i>“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.”</i>	This ES uses terminology ‘Belvedere Power Station Jetty (disused)’ rather than Borax Jetty. <b>Section 2.5 of Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> 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.
<i>“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</i>	<b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> contains information on proposed dredging (capital and maintenance) and piling works and the impacts of this have been assessed in the relevant topic chapters. The <b>Outline CoCP (Document Reference 7.4)</b> and the Deemed Marine Licence within

Statutory Consultee	Response
<p><i>identified in the ES, including an Outline Code of Construction Practice (CoCP)."</i></p>	<p>the <b>Draft DCO (Document Reference 3.1)</b> presents the mitigation measures proposed in relation to the above activities.</p>
<p><b>Greater London Authority</b></p>	
<p><i>"Part of the land to be taken by the proposed development and the two potential Mitigation Areas are designated Metropolitan Open Land (MOL). London Plan Policy G3 clearly states that MOL is afforded the same status and level of protection as Green Belt and that it should be protected from inappropriate development in accordance with national planning policy Green Belt tests."</i></p>	<p>The <b>Planning Statement (Document Reference 5.2)</b> 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 Scheme outweigh any adverse impacts. <b>Chapter 10: Townscape and Visual (Volume 1)</b> and <b>Chapter 14: Population, Health and Land use (Volume 1)</b> considers the Areas of Accessible Open Land and Non-Accessible Open Land and the users of this land, some of which include land that is designated as MOL.</p>
<p><i>"The proposed development includes taking land that currently forms part of the Crossness Nature Reserve, and Erith Marshes Site of Importance to Nature Conservation (SINC, Metropolitan Grade, i.e., the highest priority for protection). As well as noting direct, permanent, and significant adverse effects on these sites, the PEIR additionally notes significant adverse effects on Belvedere Dykes SINC and the River Thames and Tidal Tributaries SINC (Metropolitan Grade). London Plan Policy G6 states that SINCs should be protected."</i></p>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> and explains how these designations have been taken into account. The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout.</p>
<p><i>"The PEIR sets out alternative development proposals that are not considered feasible. You suggested at the meeting this conclusion is in part due to some proposals being excessively costly. We would</i></p>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of</b></p>

Statutory Consultee	Response
<p><i>like to see further detail that demonstrates there are not feasible alternatives and provision of clear justification that the benefits of the proposed development will outweigh the impacts on the environment, particularly on biodiversity. Where impacts are unavoidable, you should state clearly how you intend to apply the mitigation hierarchy (avoid, minimise, restore, and offset)."</i></p>	<p><b>Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> and explains how these designations have been taken into account. The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout. <b>Chapter 7: Terrestrial Biodiversity (Volume 1)</b> considers the potential effects from the construction and operation of the Proposed Scheme on biodiversity. The mitigation hierarchy has been followed in the development of mitigation measures, such mitigation measures are described in <b>Section 7.7</b> and <b>Section 7.9</b> of <b>Chapter 7: Terrestrial Biodiversity (Volume 1)</b>. Further information about the proposed habitat creation and ecological enhancements is provided in the <b>Outline LaBARDS (Document Reference 7.9)</b>.</p>
<p><i>"CCS typically involves significant water consumption as part of the carbon capture process. Given the southeast of England including London is classified as severely water stressed and this is increasing with climate change, Cory should consider the findings of the Charlton to Bexley Integrated Water Management Strategy and work with Thames Water and other local landowners to minimise impacts on water resources. Through, for example. employing water reuse technologies and rainwater harvesting as well as ensuring water supply infrastructure capacity is sufficient without detrimentally impacting existing local water customers."</i></p>	<p>The approach to water management, including the water demand of the Proposed Scheme, 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 compared to the design of the Proposed Scheme presented in the PEIR<sup>7</sup>, which has been achieved by:</p> <ul style="list-style-type: none"> <li>● increasing the cycle rate of the cooling towers;</li> </ul>



Statutory Consultee	Response
	<ul style="list-style-type: none"> <li>● reducing cooling demand by switching to dry cooling for CO<sub>2</sub> Processing;</li> <li>● pre-cooling the incoming flue gas (for re-heating outlet flue gas and/or use in the Heat Recovery and Heat Transfer System;</li> <li>● rainwater harvesting; and</li> <li>● onsite storage.</li> </ul>
<b>Landsul Limited and Munster Joinery Limited</b>	
<p><i>“Cory has failed properly to explain why the land is required to deliver the scheme.”</i></p>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility development zone is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b>. The <b>Design Approach Document (Document Reference 5.6)</b> 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.</p>
<p><i>“The proposals include a significant degree of optionality, including as to whether one or two carbon capture plants would be constructed. 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</i></p>	<p>As detailed in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> 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</p>

Statutory Consultee	Response
<p><i>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.”</i></p>	<p>requirement for the Carbon Capture Facility remains the same, as described in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>.</p> <p>The <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> 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.</p>
<p><i>“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. 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’.”</i></p>	<p>The <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b> explains why the Munster Joinery land is required, having considered all reasonable alternatives in the context of the operational requirements of the Carbon Capture Facility.</p> <p>At the time of writing the PEIR<sup>7</sup>, a situation that remains to date, no progress had been made in relation to matters of the acquisition of land owned by Landsul Ltd (including that occupied by Munster Joinery UK Limited, relocation of Munster Joinery or other mitigation). As the PEIR<sup>7</sup> could not assume that a relocation site for Munster Joinery UK Limited would be found it had to presume, and report as such, the consequent loss of jobs (as a consequence of demolition) as a worst case scenario. The Applicant remains open and willing to engage constructively on all these matters.</p>

Statutory Consultee	Response
<p><i>“The PEIR fails to provide a clear or coherent explanation as to the use to which the land would be put to 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.”</i></p> <p><i>“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 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.”</i></p>	<p>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. <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> explains all of the different elements which make up the Carbon Capture Facility, which, alongside the drainage proposals in the <b>Outline Drainage Strategy (Document Reference 7.2)</b> and the environmental measures set out in the <b>Outline LaBARDS (Document Reference 7.9)</b> and illustrated in the <b>Design Approach Document (Document Reference 5.6)</b>, will take up the full extent of the area required for the Carbon Capture Facility shown on the <b>Works Plans (Document Reference 2.3)</b> including the Munster Joinery land parcel.</p> <p>The indicative layout at <b>Figure 3-1: Terrestrial Site Alternatives Plan (Volume 2)</b> gives one example of how the Carbon Capture Facility could be laid out within the parameters allowed for by the <b>Works Plans (Document Reference 2.3)</b>.</p>

Statutory Consultee	Response
<p><i>“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.”</i></p>	<p>As illustrated on the <b>Works Plans (Document Reference 2.3)</b> the footprint required for the Carbon Capture Facility is some eight hectares. By comparison, Riverside 1 and Riverside 2 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.</p>
<p><i>“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 1,500m<sup>2</sup>. The land identified for compulsory acquisition is more than 5 times that size.”</i></p>	<p>The land which is proposed for compulsory acquisition (as shown on the <b>Land Plans (Document Reference 2.2)</b>) covers the footprint of the entire Carbon Capture Facility, as shown on the <b>Works Plans (Document Reference 2.3)</b>. This is not limited to the footprint of the control room and welfare facilities alone.</p>
<p><b>Marine Management Organisation</b></p>	
<p><i>“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.”</i></p>	<p>Each relevant technical chapter demonstrates consideration of the South East Inshore Marine Plan. An assessment of compliance with the Marine Plan is provided in the <b>Planning Statement (Document Reference 5.2)</b>.</p>

Statutory Consultee	Response
<p><i>“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.”</i></p>	<p>No response required.</p>
<p><b>Natural England</b></p>	
<p><i>“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.</i></p> <p><i>We welcome the opportunity to provide comments on the Preliminary Environmental Information Report (PEIR) for the proposed Cory Decarbonisation Project.</i></p> <p><i>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.”</i></p>	<p>The final LCO<sub>2</sub> storage locations do not form part of the Proposed Scheme. However, an outline of the selection process for geological storage is provided in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>. This has been accounted for in <b>Chapter 13: Greenhouse Gases (Volume 1)</b>.</p>
<p><b>Port of London Authority</b></p>	
<p><i>“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</i></p>	<p>The nature and extent of the works are shown on the <b>Works Plans (Document Reference 2.3)</b>, and further explanatory detail is</p>

Statutory Consultee	Response
<p><i>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.</i></p>	<p>provided in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>. The incorporate space for the Proposed Jetty, modification of removal of the Belvedere Power Station Jetty (disused), associated dredging, and associated working space.</p>
<p><i>“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:</i></p> <ul style="list-style-type: none"> <li><i>• 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.</i></li> <li><i>• 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.”</i></li> </ul>	<p><b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> 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 <b>Jetty Site Alternatives Report (Document Reference 7.6)</b>) 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 <b>Draft DCO (Document Reference 3.1)</b>.</p>
<p><b>Seamus Gannon</b></p>	
<p><i>“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.”</i></p>	<p>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,</p>

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	<p>as per typical design life of the civil and structural elements of the Proposed Scheme.</p> <p>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 <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>.</p>
<p><i>“There seems not to be a compelling case in the public interest for the compulsory acquisition of the two land interests, not least because:</i></p> <ul style="list-style-type: none"> <li><i>i) there are alternative areas on which the development/construction compounds/ecological mitigation works could be delivered.</i></li> <li><i>ii) It is not clear whether there has been proper disaggregation of the elements of the proposed development in considering alternatives; and</i></li> <li><i>iii) 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.”</i></li> </ul>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility development zone is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b>. The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout within the development zone, including consideration of how the site should be aggregated or disaggregated.</p> <p><b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> 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 <b>Works Plans (Document Reference 2.3)</b>) upon completion of construction.</p>
<p><b>Thames Water</b></p>	

Statutory Consultee	Response
<p><i>“We would also question the robustness of a site selection exercise (and consideration of reasonable alternatives) that has concluded the Crossness LNR is the most appropriate site for the Proposed Development. It is noted, for instance, that Fisher 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.</i></p> <p><i>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.”</i></p>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility development zone is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b>. This includes consideration of sites that did not include Thames Water land and the balancing of environmental effects.</p> <p>The <b>Design Approach Document (Document Reference 5.6)</b> presents the rationale for the selected site layout within the development zone.</p>
<p><i>“From an asset protection perspective, TWUL has not received enough detailed information from Cory to understand the physical impact on its assets at this stage. 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.”</i></p>	<p>The Applicant has held numerous meetings with Corporate, Property, Planning, water supply/discharge management, Major Projects (Asset Protection) and nature reserve/ecology teams within Thames Water throughout development of the Proposed Scheme. To date, no agreement has been reached in relation to land and policy matters; the Applicant remains open and willing to engage constructively on all these matters.</p> <p>There is limited interaction of the built development aspects of the Proposed Scheme within 5m of Thames Water’s assets, with the exception the access road from Norman Road to the Crossness Sewage Treatment Works, for which the DCO includes powers to divert if necessary, and water supply to Riverside 1 and Riverside 2 located within Norman Rod. The Applicant has discussed this asset</p>



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	<p>with the Major Projects Team, with both parties agreeing it was at low risk from the Proposed Scheme.</p> <p>Protective provisions are a mechanism by which measures to protect the interests of utility owners are secure. Relevant protective provisions for Thames Water have been included within the <b>Draft DCO (Document Reference 3.1)</b>, to deal with the above issues.</p>
<p><i>“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.</i></p> <p><i>Specifically, TWUL would wish for the following matters to be considered and addressed:</i></p> <ul style="list-style-type: none"> <li>• <i>Removal of the Crossness NR land from the Proposed Application red line boundary;</i></li> <li>• <i>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;</i></li> <li>• <i>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;</i></li> <li>• <i>Clarity around the Proposed Development’s proximity to, and impact on, TWUL’s operational assets; and</i></li> </ul>	<p>The options considered for both site location and layout for the Proposed Scheme are presented in <b>Chapter 3: Consideration of Alternatives (Volume 1)</b>. The site assessment process for the Carbon Capture Facility development zone is presented in the <b>Terrestrial Site Alternatives Report (Document Reference 7.5)</b>. The <b>Design Approach Document (Document Reference 5.6)</b> 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.</p> <p>These documents explain how the Applicant has balanced impacts to third party land, MOL, LNR and other designations to finalise the selected development zone.</p> <p>Mitigation measures for habitat creation and enhancement of Crossness LNR are set out in <b>Chapter 7 Terrestrial Biodiversity (Volume 1)</b> the <b>Appendix 7.6: Biodiversity Net Gain Report (Volume 3)</b> and the <b>Outline LaBARDS (Document Reference 7.9)</b>.</p>

Statutory Consultee	Response
<ul style="list-style-type: none"> <li><i>Further discussions around the potable water peak demand required for the Development.”</i></li> </ul>	<p>The method for water supply and the interaction with Thames Water’s operational assets (The Crossness Sewage Treatment Works for example) is described in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>.</p>
<p><b>Tilfen Land Ltd and the Peabody Trust</b></p>	
<p><i>“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.”</i></p>	<p>The <b>Design Approach Document (Document Reference 5.6)</b> and the <b>Design Principles and Design Code (Document Reference 5.7)</b> 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 <b>Outline LaBARDS (Document Reference 7.9)</b>.</p>
<p><i>“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.”</i></p>	<p>No response required.</p>
<p><i>“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.”</i></p>	<p><b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b> 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 <b>Jetty Site Alternatives Report (Document Reference 7.6)</b>) sets out further measures for the effective preservation of the structure.</p>

Statutory Consultee	Response
<p><i>“Peabody has no comments at this stage as regards the proposed new jetty.”</i></p>	<p>No response required.</p>
<p><i>“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”).”</i></p>	<p>This is correct, further information about the proposals for the Norman Road Field and Thamesmead Golf Course is provided in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>, <b>Chapter 7: Terrestrial Biodiversity (Volume 1)</b> and the <b>Outline LaBARDS (Document Reference 7.9)</b>.</p>
<p><i>“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.”</i></p>	<p>Habitat creation and enhancement intended for the BNG Opportunity Area at the Thamesmead Golf Course are set out in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>. The <b>Outline LaBARDS (Document Reference 7.9)</b> presents the principles of what is sought to be achieved in this area.</p>
<p><i>“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.”</i></p>	<p>No response required.</p>

Statutory Consultee	Response
<p><i>“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.”</i></p>	<p>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.</p> <p>Further information can be found in <b>Chapter 2: Site and Proposed Scheme Description (Volume 1)</b>.</p>
<p><i>“The programme and timing for delivery of the works will be key and should address re-provision and relocation of existing uses and habitats prior to taking, or carrying out works to, land that may be required.”</i></p>	<p>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.</p> <p>The <b>Outline LaBARDS (Document Reference 7.9)</b> contains details on mitigation works relating to re-provision and relocation of existing uses and habitats, including any relevant timings.</p>

## 4.5. CONSIDERATION OF ALTERNATIVES

- 4.5.1. Regulation 14(2)(d) of the EIA Regulations<sup>2</sup> states that an ES should include:  
*“a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment”.*
- 4.5.2. Further detail around the consideration of alternatives is set out in **Chapter 3: Consideration of Alternatives (Volume 1)**.
- 4.5.3. At this stage some options remain in relation to the design of the Proposed Scheme, as detailed in **Chapter 2: Site and Project Description (Volume 1)**. Examples of outstanding options include: the retention (with modifications), or demolition, of the Belvedere Power Station Jetty (disused); water supply, and the inclusion of one or two Carbon Capture Plant(s) and the phasing of the construction programme. For the purposes of this ES, each environmental topic has assumed a reasonable worst case during assessment, which is detailed within each of the chapters.

## 4.6. TEMPORAL SCOPE

- 4.6.1. The assessment scenarios considered within this EIA are as follows:
- Existing baseline (without the Proposed Scheme, further detail is provided in **Section 4.8** below) – this is the year that baseline data has been collected.
  - Future baseline (without the Proposed Scheme but with Riverside 2 in place, further detail is provided in **Section 4.9** below).
  - Construction of the Proposed Scheme will have a duration of either 60 months or 42 months, as detailed in **Chapter 2: Site and Proposed Scheme Description (Volume 1)**. **Chapter 5: Air Quality (Volume 1)** to **Chapter 20: Major Accidents and Disasters (Volume 1)** identify and assess a ‘reasonable worst case’ for each technical topic in light of the optionality set out in **Chapter 2: Site and Proposed Scheme Description (Volume 1)** and this is detailed within each chapter.
  - Operation and maintenance of the Proposed Scheme as detailed in **Chapter 2: Site and Proposed Scheme Description (Volume 1)**. The period that the Proposed Scheme would operate and be maintained, the ‘design life’, is assumed to be 50 years. Where there is optionality for the Proposed Scheme, chapters **Chapter 5: Air Quality (Volume 1)** to **Chapter 20: Major Accidents and Disasters (Volume 1)** identify and assess a ‘reasonable worst case’ for the technical topic. This is detailed within each chapter.

## 4.7. DEFINING THE STUDY AREA

- 4.7.1. The proposed Study Area for each technical topic can vary as it is influenced by the specific assessment to be undertaken, matters relevant to the discipline, and the nature of the existing environmental baseline. The Study Area for each chapter is described respectively in **Chapter 5: Air Quality (Volume 1)** to **Chapter 21: Cumulative Effects (Volume 1)**.
- 4.7.2. It is also recognised that some effects impact a defined area, for example direct impacts on buried archaeology, whereas other effects are more widespread, for example considering the potential effects on townscape character.

## 4.8. ESTABLISHING EXISTING BASELINE CONDITIONS

- 4.8.1. Potential likely significant environmental effects are described in this ES in relation to the extent of change(s) to the existing baseline and future baseline environment, as a result of the construction and/or operation of the Proposed Scheme. The baseline environment includes the existing environmental characteristics and conditions based on surveys undertaken and information available at the time of the assessment.
- 4.8.2. Baseline conditions have been established by:
- site visits and surveys;
  - desk based studies; and
  - topic specific modelling.
- 4.8.3. The baseline conditions for each technical topic as currently understood are set out within **Chapter 5: Air Quality (Volume 1)** to **Chapter 20: Major Accidents and Disasters (Volume 1)**.
- 4.8.4. The baseline conditions used in this ES vary depending on the timing of surveys or the date at which data sources have been produced/assessed. The information which informs the baseline environment for the assessments is predominantly based on data obtained, or surveys completed, between Q2 of 2022 and Q4 of 2023. Where appropriate, existing baseline data collected prior to this period has been used to inform the assessment if it is deemed to remain relevant.
- 4.8.5. Data obtained from third party sources may be older, but the origin of all third party data and its applicability to the assessment is clearly outlined, alongside any limitations and assumptions, in the chapters.
- 4.8.6. It is assumed, for the purpose of this ES, that the existing baseline conditions at the Site will include Riverside 1 operating at peak capacity (i.e. a maximum throughput of 850,000 tpa). The baseline conditions do not account for Riverside 2 construction activities being undertaken. The assessment presented within the chapters are based on Riverside 2 being operational ahead of the construction phase for the Proposed Scheme commencing. Any deviation to this approach is described in the relevant chapter of this ES.

## LIMITATIONS

- 4.8.7. The period of validity for each set of baseline data collected is set out in this ES.
- 4.8.8. It has been necessary to collect baseline data from third party private land. Where it has not been possible to access third party private land by agreement, data has been collected from publicly accessible land only, this has been detailed within the chapters where relevant.

## 4.9. ESTABLISHING FUTURE BASELINE CONDITIONS

- 4.9.1. This ES includes an outline of the likely evolution of the existing baseline without implementation of the Proposed Scheme, based on available information and knowledge and including consideration of the effects of climate change. This information is set out in **Chapter 2: Site and Proposed Scheme Description (Volume 1)** and **Chapter 5: Air Quality (Volume 1)** to **Chapter 20: Major Accidents and Disasters (Volume 1)**.
- 4.9.2. It is assumed for the purpose of this ES that the future baseline conditions within the Site will include both Riverside 1 and Riverside 2 as two operational facilities at capacity (i.e. a maximum throughput at Riverside 1 of 850,000 tpa and a maximum throughput at Riverside 2 of 805,920 tpa). At the time of writing this ES, Riverside 2 is under construction. It is intended that construction of Riverside 2 will be complete prior to construction commencing for the Proposed Scheme.

## 4.10. PARAMETERS OF THE PROPOSED SCHEME (ROCHDALE ENVELOPE)

- 4.10.1. The design of the Proposed Scheme will continue to be refined even through its construction phase. This evolution will be undertaken within the parameters of assessment secured through the DCO through the limits of deviation shown on the **Works Plans (Document Reference 2.3)**, the **Design Principles and Design Code (Document Reference 5.7)<sup>b</sup>**, and the parameters schedule of the **Draft DCO (Document Reference 3.1)**, which reflects **Table 2-2 of Chapter 2: Site and Proposed Scheme Description (Volume 1)**. This approach enables flexibility to be maintained, which is critical given the advancement of carbon capture technology, but within a framework of identified controls.
- 4.10.2. The parameters approach ensures the assessment of environmental effects associated with the Proposed Scheme will be the worst case, and that the actual development to be carried out, within the defined parameters, would be no worse than the effects reported in this ES. The detailed design and construction methodology for the Proposed Scheme will be developed within these parameters without the need for

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<sup>b</sup> The technical chapters have identified which of these are embedded or additional mitigation measures, as relevant.

further assessment. Mitigation design and environmental management measures, secured through approvals will be required to confirm assessment outcomes, as secured through the **Draft DCO (Document Reference 3.1)**, and have therefore been taken into account as part of the assessment process, as described in each technical chapter.

- 4.10.3. This parameters-based approach (also known as the ‘Rochdale Envelope’ approach) aligns with Planning Inspectorate Advice Note Nine<sup>8</sup> (Rochdale Envelope) and defines the limitations within which the construction and operation of the Proposed Scheme will be undertaken, and thus forms the basis of the assessment.

## 4.11. ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS

- 4.11.1. This ES reports on the potential likely significant effects for the construction and operation (including maintenance) phases of the Proposed Scheme. The assessment of the Likely Significant Effects (LSE) for the Proposed Scheme has been undertaken both before and after additional mitigation measures have been applied. Effects after additional mitigation have been applied are referred to as ‘residual effects’.
- 4.11.2. The mitigation hierarchy is to first try to avoid, then prevent and then reduce likely significant adverse effects on the environment and, if possible, offset likely significant adverse effects on the environment. The Proposed Scheme has applied the mitigation hierarchy throughout the assessments and within the mitigation measures proposed.
- 4.11.3. The assessment takes into the account the following:
- likelihood of occurrence;
  - geographical extent;
  - adherence of the proposals to legislation and planning policy;
  - adherence of the proposals to international, national and local standards;
  - sensitivity of the receiving environment or other receptor;
  - value of the receiving resource;
  - whether the effect is temporary or permanent;
  - whether the effect is short term, medium term or long term in duration; and
  - whether the effect is reversible or irreversible.
- 4.11.4. Unless stated otherwise in topic chapter, the duration of an effect is considered to be:
- Temporary:
    - Short term: up to five years; or
    - Medium term: six to 10 years.
  - Permanent:
    - Long term: over 10 years.



## ASSESSMENT OF SIGNIFICANCE

- 4.11.5. The method for assessing the significance of an effect varies between environmental topics, but in principle is based on the environmental sensitivity (or value/importance) of a receptor and the magnitude of change from baseline conditions. Guidance that requires topic specific criteria or scales for determining significance is presented in the relevant chapter of this ES.
- 4.11.6. In the absence of topic specific guidance, both the magnitude of change and sensitivity (or value/importance) is assessed on a scale of high; medium; low; and negligible. The significance of each effect is assessed against the magnitude of change and the sensitivity (or value/importance) of the receptor or receiving environment using the matrix in **Table 4-2**. Any deviation to this approach is described in the relevant chapter of this ES.
- 4.11.7. Only Moderate and Major effects are significant in EIA terms unless specified otherwise within the chapters of this ES.

**Table 4-2: Matrix for Determining Significant Effects**

		Sensitivity of Receptor/Receiving Environment to Change			
		High	Medium	Low	Negligible
Magnitude of Change	High	Major	Major to Moderate	Moderate	Negligible
	Medium	Major to Moderate	Moderate	Minor to Moderate	Negligible
	Low	Moderate	Minor to Moderate	Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

## 4.12. APPROACH TO MITIGATION

- 4.12.1. IEMA issued ‘Shaping Quality Development’<sup>9</sup> in November 2015 and ‘Delivering Quality Development’<sup>10</sup> in July 2016. In accordance with these guidance documents, three types of mitigation are identified and used within this ES:
- primary mitigation – modifications to the location or design during the pre-application phase that are integral to the Proposed Scheme. These measures are treated as an inherent part of the Proposed Scheme;
  - secondary mitigation – actions that will require further activity to achieve the anticipated outcome. These are developed following the initial assessment of

effects taking into account Primary and Tertiary mitigation and inform the assessment of residual effects. They are secured by the DCO or other suitable mechanism; and

- tertiary mitigation – actions that would occur with or without input from the EIA. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are standard to meet other existing legislative requirements, or actions that are standard practices used to manage commonly occurring environmental effects. These measures are treated as an inherent part of the Proposed Scheme.

- 4.12.2. The primary and tertiary mitigation is presented in the Proposed Scheme description in this ES (see **Chapter 2: Site and Proposed Scheme Description (Volume 1)**) and other relevant chapters and is referred to as ‘embedded mitigation’. The assessment of the likely significant environmental effects for the pre-mitigation scenario takes embedded mitigation into account in determining the magnitude of change.
- 4.12.3. Following assessment of the likely significant effects of the Proposed Scheme with embedded mitigation, any secondary mitigation measures that are identified to be necessary, referred to as ‘additional mitigation’, are outlined within the relevant chapter of this ES. These mitigation measures will further reduce an adverse effect or enhance a beneficial one.
- 4.12.4. A summary of the design embedded mitigation is included in **Chapter 2: Site and Proposed Scheme Description (Volume 1)**. The additional mitigation for each topic is also recorded in **Chapter 22: Summary (Volume 1)**.
- 4.12.5. In addition, the **Mitigation Schedule (Document Reference 7.8)** documents the additional mitigation and monitoring proposed and indicates how the commitments will be implemented and secured. Further detail is provided below in **Section 4.20**.
- 4.12.6. Protective provisions are a further mechanism by which measures to protect the interests of utility owners will be secured. Relevant protective provisions have been included within the **Draft DCO (Document Reference 3.1)**, as required.

## 4.13. MONITORING

- 4.13.1. The EIA Regulations<sup>2</sup> require, where appropriate, the monitoring of potential significant adverse effects. Monitoring arrangements proposed are outlined within the relevant chapters of this ES and detailed within the **Mitigation Schedule (Document Reference 7.8)** as discussed below in **Section 4.20**.

#### 4.14. ROLE OF OTHER CONSENTS

- 4.14.1. The Proposed Scheme will require a series of supporting consents and licenses not covered by the **Draft DCO (Document Reference 3.1)**. Primary of these is the Environmental Permit required for the operation of the Carbon Capture Facility. An application for an Environmental Permit will be made to the Environment Agency following submission of the application for development consent.
- 4.14.2. All other consents and licenses are identified in the **Other Consents and Licenses Report (Document Reference 5.5)** which defines all those disappplied under the DCO and those which will be taken forward separately.
- 4.14.3. Within the assessments presented in this ES, any additional consents that are required are treated as embedded mitigation as it is assumed they will be in place and any mitigation measures required by them, implemented.

#### 4.15. APPROACH TO DECOMMISSIONING

- 4.15.1. Any decommissioning would be likely to be completed in less time than the construction of the Proposed Scheme and, whilst the Applicant has no plans to decommission and remove the Proposed Scheme, were it to be removed, it would be likely to require a similar degree of plant, equipment, and disturbance to that predicted during construction. It is considered that the potential sensitivity of receptors during decommissioning is likely to be similar to those during construction but with a lower magnitude of impact due to the shorter timeframe associated with any decommissioning.
- 4.15.2. As described by technical topic in **Chapter 2: Site and Proposed Scheme Description (Volume 1)** there are unlikely to be any new or different significant effects during decommissioning compared with those identified during construction, see **Chapter 5: Air Quality (Volume 1)** to **Chapter 21: Cumulative Effects (Volume 1)**, and in many cases the effects are likely to be of a lower significance than the effects being assessed for construction due to the anticipated lower magnitude of effects anticipated during decommissioning. Considering this and given that the Applicant has no plans to decommission the Proposed Scheme, further consideration of decommissioning is not considered appropriate.
- 4.15.3. A Demolition Environmental Management Plan would be prepared in advance of decommissioning commencing, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

#### 4.16. IN-COMBINATION CLIMATE CHANGE IMPACTS

- 4.16.1. An in-combination climate change impact assessment has been included within **Appendix 12-1: In-combination Climate Change Impacts Assessment (Volume 3)** to consider the extent to which climate change may alter the effects that have been identified through the assessment for each topic. This has been carried out in line with IEMA 'EIA Guide to Climate Change Resilience and Adaptation'<sup>11</sup>.

#### 4.17. ASSESSMENT OF TRANSBOUNDARY IMPACTS

- 4.17.1. Regulation 32 of the EIA Regulations<sup>2</sup> sets out the procedural duties required where the SoS deems that a project being considered under the EIA Regulations is likely to have significant effects on the environment in a European Economic Area (EEA) State; or where an EEA State deems that its environment is likely to be significantly affected by a project being considered under the EIA Regulations. Further guidance is provided in Planning Inspectorate Advice Note 12<sup>12</sup>.
- 4.17.2. The Applicant considers that transboundary impacts will not occur due to the localised physical nature of the works; and given that any emissions are unlikely to travel to any other EEA state from the Site. The Planning Inspectorate agreed with this approach in the Scoping Opinion<sup>5</sup>.

#### 4.18. ASSESSMENT OF HEAT AND RADIATION

- 4.18.1. Schedule 4 of the EIA Regulations<sup>2</sup> requires consideration of the likely significant effects of the Proposed Scheme resulting from the emission of heat, light and radiation.
- 4.18.2. The Applicant considers that impacts from the emission of heat, light and radiation are not relevant to the Proposed Scheme as no significant sources of such emissions are anticipated. The Planning Inspectorate agreed with this approach as part of the Scoping Opinion<sup>5</sup>.
- 4.18.3. The effects of heatwaves, extreme weather and other external hazards are considered within **Chapter 20: Major Accidents and Disasters (Volume 1)**.

#### 4.19. COORDINATION OF ASSESSMENTS

- 4.19.1. There are six other assessments that have been undertaken to support the application for development consent and have been submitted alongside this ES.

#### **HABITATS REGULATIONS ASSESSMENT**

- 4.19.2. The overarching aim of the Habitats Regulations Assessment (HRA) is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan or project, either in isolation and/or in-combination with other plans or projects ('inter-project') could lead to adverse effects on the integrity of a National Network Site(s).

- 4.19.3. A report titled 'Information to Inform a HRA' comprising Stage 1 – Screening and Stage 2 – Information to inform an Appropriate Assessment has been submitted as part of the application for development consent (see **Appendix 7-3: Information to Inform a Habitat Regulation Assessment (Volume 3)**). The first stage identified National Network Sites scoped into the HRA process, and likely significant effects associated with the Proposed Scheme. The second stage makes an Appropriate Assessment of the adverse effects on integrity arising as a result of the Proposed Scheme (and other schemes that could act in-combination with the Proposed Scheme ('inter-project')) on National Network Site(s). This takes into account the conservation objectives of the National Network Site(s) and whether mitigation for adverse effects on integrity is needed. The Appropriate Assessment determines that further HRA stages do not need to be applied to achieve compliance with legislation.
- 4.19.4. The assessment of inter-project effects through the HRA process extends to a 15km Study Area (as described in **Chapter 7: Terrestrial Biodiversity (Volume 1)**). However, modelling effects of the emissions of other projects is neither practicable nor necessary given the extent of the Study Area and the large distance between the Proposed Scheme and Epping Forest SAC (14km). Inter-project impacts can therefore robustly be considered to be de-minimus and the Proposed Scheme could not reasonably act in-combination with other projects to have an adverse effect on the integrity of Epping Forest SAC.
- 4.19.5. Whilst the overarching objectives of EIA and HRA are similar, their scope, level of detail and terminology vary. Consequently, these assessments have been undertaken separately. The scope presented within this ES has been developed cognisant of the needs of both processes to ensure a coordinated assessment overall.

### **BIODIVERSITY NET GAIN (BNG) ASSESSMENT**

- 4.19.6. Since the publication of the PEIR<sup>7</sup>, DEFRA has updated its biodiversity metric used to determine Biodiversity Net Gain from Version 4.0 to the current Statutory Biodiversity Metric. The Statutory Biodiversity Metric<sup>13</sup> has been used in the BNG Assessment which is presented in **Appendix 7.6: Biodiversity Net Gain Report (Volume 3)**. This report analyses the habitats to be retained, enhanced, created, or lost within the Site and identifies the enhancement to be provided within each of the BNG Opportunity Area and the Mitigation and Enhancement Area, which are shown on **Figure 7-7: Proposed Habitat Creation and Enhancements (Volume 2)**. These are secured pursuant to the **Outline LaBARDS (Document Reference 7.9)**.

## WATER FRAMEWORK DIRECTIVE ASSESSMENT

- 4.19.7. A Water Framework Directive (WFD) Screening Report was submitted alongside the EIA Scoping Report<sup>4</sup> that considered the potential for construction and operation impacts from the Proposed Scheme upon the relevant WFD quality elements, and the potential for impacts to the Thames Middle Water Body (water body ID: GB530603911402). This included identifying likely risks to: hydromorphology, biology, water quality, WFD protected areas and the spread of invasive non-native species.
- 4.19.8. In response to the EIA Scoping Opinion<sup>5</sup> the Greenwich Tertiaries and Chalk Water Body WFD Groundwater Body (water body ID: GB40602G602500) is included in the WFD Assessment.
- 4.19.9. Engagement with the Environment Agency has informed the scope of the WFD Assessment which is presented in **Appendix 11-1: Water Framework Directive Assessment (Volume 3)**.
- 4.19.10. The WFD Assessment considers both the Thames Middle Water Body and the Greenwich Tertiaries and Chalk Groundwater Body. Further information is presented in **Chapter 11: Water Environment and Flood Risk (Volume 1)** and has utilised the same baseline and modelling information as this ES to inform its conclusions.

## FLOOD RISK ASSESSMENT

- 4.19.11. A Flood Risk Assessment (FRA) has been prepared in accordance with EN-1<sup>14</sup> and National Planning Policy Framework (NPPF)<sup>15</sup>, and is presented in **Appendix 11-3: Flood Risk Assessment (Volume 3)**.
- 4.19.12. The FRA qualitatively assesses the potential implications of the Proposed Scheme on flood risk to people and property elsewhere, as well as the potential risk of flooding to the Proposed Scheme. The scope of the FRA has been developed in conjunction with consultation with the Environment Agency. Further detail is provided in **Chapter 11: Water Environment and Flood Risk (Volume 1)** and **Appendix 11-3: Flood Risk Assessment (Volume 3)**.

## PRELIMINARY NAVIGATIONAL RISK ASSESSMENT

- 4.19.13. The overarching aim of the Preliminary Navigational Risk Assessment (pNRA) is to determine, in view of its location on the River Thames, whether the Proposed Scheme's marine infrastructure could lead to adverse effects on navigation within the river. The pNRA consists of river navigation analysis, the identification of baseline risk controls, stakeholder engagement and risk assessments to bring all construction and operation phase hazards down to as low as reasonably practical (ALARP). **Chapter 19: Marine Navigation (Volume 1)** is based on the findings of the Preliminary Navigation Hazard Analysis which is presented as **Appendix 19-1 Preliminary Navigational Risk Assessment (Volume 3)**. A full NRA will be developed, based on this preliminary NRA, as is secured by a requirement of the **Draft DCO (Document Reference 3.1)**.

## HISTORIC ENVIRONMENT DESK BASED ASSESSMENT

- 4.19.14. The Historic Environment Desk Based Assessment (HEBDA), presented in **Appendix 9-1: Historic Environment Desk Based Assessment (Volume 3)**, contains an assessment of harm to the historic environment in accordance with EN-1<sup>14</sup> and NPPF<sup>15</sup>.

## 4.20. ADDITIONAL APPLICATION DOCUMENTS

- 4.20.1. The additional documents submitted as part of the DCO application that do not form part of this ES but have been referred to within it, are:
- **Design Approach Document (Document Reference 5.6);**
  - **Design Principles and Design Code (Document Reference 5.7);**
  - **Outline Drainage Strategy (Document Reference 7.2);**
  - **Outline Lighting Strategy (Document Reference 7.3);**
  - **Outline Code of Construction Practice (Outline CoCP) (Document Reference 7.4);**
  - **Framework Construction Traffic Management Plan (Framework CTMP) (Document Reference 7.7);**
  - **Mitigation Schedule (Document Reference 7.8);**
  - **Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy (Outline LaBARDS) (Document Reference 7.9);**
  - **Outline Site Waste Management Plan (Outline SWMP) (Document Reference 7.10);** and
  - **Outline Emergency Preparedness and Response Plan (Outline EPRP) (Document Reference 7.11).**
- 4.20.2. With the exception of the **Design Principles and Design Code (Document Reference 5.7)** and the **Design Approach Document (Document Reference 5.6)**, each of the above documents will be developed into full documents, in substantial accordance with the outline documents, in accordance with the **Draft DCO (Document Reference 3.1)**.

## DESIGN APPROACH DOCUMENT, DESIGN PRINCIPLES AND DESIGN CODE

- 4.20.3. The **Design Approach Document (Document Reference 5.6)** provides a summary of the design of the Proposed Scheme, the nature of public and stakeholder consultation and its impact on the design and sets out the design process from the results of the development zone optioneering process to the preferred design.
- 4.20.4. The **Design Principles and Design Code (Document Reference 5.7)** are also submitted for approval as separate document and sets out the Applicant's

commitment to design governance that will guide the next stages of design development post DCO submission.

## **OUTLINE DRAINAGE STRATEGY**

- 4.20.5. An **Outline Drainage Strategy (Document Reference 7.2)** details the drainage systems and attenuation within the Site. The document has been developed in consultation with, and in accordance with the published requirements of, both the LLFA and Environment Agency and in line with the SuDS Manual<sup>16</sup>.
- 4.20.6. The full Drainage Strategy will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## **OUTLINE LIGHTING STRATEGY**

- 4.20.7. An **Outline Lighting Strategy (Document Reference 7.3)** has been produced in accordance with the Institution of Lighting Professionals (ILP) PLG04 'Guidance on Undertaking Environmental Lighting Impact Assessments' in order to minimise effects from light intrusion, sky glow or glare. The **Outline Lighting Strategy (Document Reference 7.3)** seeks to ensure that external lighting for the Proposed Scheme is designed to deliver a safe working environment in all relevant areas of both the Carbon Capture Facility and the Proposed Jetty during nighttime whilst avoiding unnecessary light pollution and minimising visual impact on nearby receptors.
- 4.20.8. The full Lighting Strategy will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## **OUTLINE CODE OF CONSTRUCTION PRACTICE**

- 4.20.9. The **Outline CoCP (Document Reference 7.4)** sets out the framework for the environmental controls, environmental protection measures and safety procedures that will be adopted during the construction phase.
- 4.20.10. This includes mitigation measures to minimise potential effects to terrestrial and marine receptors across all the topics in this ES.
- 4.20.11. The full CoCP(s) will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## **MITIGATION SCHEDULE**

- 4.20.12. The **Mitigation Schedule (Document Reference 7.8)** documents the additional mitigation and monitoring proposed and indicates how these commitments are secured. This includes mitigation presented in this ES.



## **OUTLINE LANDSCAPE, BIODIVERSITY ACCESS AND RECREATION DELIVERY STRATEGY**

- 4.20.13. The **Outline LaBARDS (Document Reference 7.9)** sets out the Applicant's proposals for the Mitigation and Enhancement Area as well as proposals for how it will be managed and maintained during the lifetime of the Proposed Scheme. It also does the same for the BNG Opportunity Area. The land within these areas has been identified provide habitat mitigation, compensation and enhancement (including planting).
- 4.20.14. The full LaBARDS(s) will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## **OUTLINE SITE WASTE MANAGEMENT PLAN**

- 4.20.15. The **Outline SWMP (Document Reference 7.10)** sets out the key principles and procedures for managing waste during the construction of the Proposed Scheme, specifically detailing the opportunities to reuse waste material onsite or reduce offsite disposal. The full SWMP(s) will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## **OUTLINE EMERGENCY PREPAREDNESS AND RESPONSE PLAN**

- 4.20.16. An **Outline EPRP (Document Reference 7.11)** provides the outline contingency plans in the event that an emergency event occurs onsite (including within the River Thames and flood events).
- 4.20.17. The full EPRP(s) will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## **FRAMEWORK CONSTRUCTION TRAFFIC MANAGEMENT PLAN**

- 4.20.18. The **Framework CTMP (Document Reference 7.7)** is a mechanism for ensuring the successful management of the likely environmental effects resulting from constructing related traffic. This outline controls relating to construction vehicles, construction worker movements, plant, vehicle access routes and general arrangements.
- 4.20.19. The full CTMP(s), incorporating a full construction worker travel plan, will be prepared prior to the commencement of construction in substantial accordance with this outline, which is secured by a requirement in the **Draft DCO (Document Reference 3.1)**.

## 4.21. REFERENCES

- <sup>1</sup> National Infrastructure Planning. (2020). 'Advice Note 7 (Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements (Version 7)'. Available at:  
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-and-environmental-statements/>
- <sup>2</sup> UK Gov. (2017). 'The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017'. Available at:  
<https://www.legislation.gov.uk/ukxi/2017/572/contents/made>
- <sup>3</sup> Cory Group. (2023). 'Welcome – Cory Decarbonisation Project'. Available at:  
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- <sup>4</sup> Cory Environmental Holdings Ltd. (2023). 'Environmental Impact Assessment Scoping Report: Cory Decarbonisation Project'. Available at:  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010128/EN010128-000021-EN010128%20-%20Scoping%20Report.pdf>
- <sup>5</sup> Planning Inspectorate. (2023). 'Environmental Impact Assessment Scoping Opinion: Cory Decarbonisation Project'. Available at:  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010128/EN010128-000026-EN010128%20-%20Scoping%20Opinion.pdf>
- <sup>6</sup> UK Gov. (2008). 'Planning Act 2008'. Available at:  
<https://www.legislation.gov.uk/ukpga/2008/29/contents>
- <sup>7</sup> Cory Environmental Holdings Limited. (2023). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at:  
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- <sup>8</sup> National Infrastructure Planning. (2020). 'Advice Note 9: Rochdale Envelope (Version 6)'. Available at: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-nine-rochdale-envelope/>
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- <sup>11</sup> IEMA. (2020). 'EIA Guide to Climate Change Resilience and Adaptation'. Available at:  
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- <sup>12</sup> National Infrastructure Planning. (2020). 'Advice Note 12: Transboundary Impacts and Processes (Version 6)'. Available at:  
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-twelve-transboundary-impacts-and-process/>
- <sup>13</sup> Natural England. (2022). 'The Biodiversity Metric 4.0 (JP039)'. Available at:  
<https://nepubprod.appspot.com/publication/6049804846366720>
- <sup>14</sup> Department for Energy Security and Net Zero (2024). 'Overarching National Policy Statement for Energy (EN-1)'. Available at:  
<https://www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure>
- <sup>15</sup> Ministry of Housing, Communities and Local Government. (2023). 'National Planning Policy Framework'. Available at:  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- <sup>16</sup> CIRIA. (2015). 'The SuDS Manual (C753)'.



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