



Application for Development Consent

Application Reference Number: WWO10001

Examining Authority's Second Written Round of Questions and Requests for Information Response from Thames Water

Flood Risk and Climate Change

Doc Ref: **APP53**



Responses to second written questions Q26 Flood Risk and Climate Change

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1 Question: 26.1

Can the EA comment on the adequacy of the FDAIR and identify any outstanding matters?

1.1 Our response

1.1.1 This question is directed to the Environment Agency and therefore we have not provided any response.

2 Question: 26.2

Can the Applicant advise if the Infrastructure Carbon Review (2013) has an impact on the Energy and Carbon Footprint Report (Doc 7.08) and if so how?

2.1 Our response

- 2.1.1 We reviewed the [Infrastructure Carbon Review](#) (HM Treasury, 2013) and concluded that it has no impact on the methodology or findings of the [Energy and Carbon Footprint Report](#) (Doc ref: 7.08) as a result.
- 2.1.2 The review is a high-level document aimed at leaders of organisations involved in designing, constructing, operating and maintaining economic infrastructure assets and seeks to highlight the value of utilising lower carbon solutions in infrastructure. Its objective is to make carbon reduction “*part of the DNA of infrastructure*” and it begins to address the low-carbon aspirations of the Government’s [Construction industrial strategy](#).
- 2.1.3 The review highlights that there are a number of structural, cultural and practical barriers in place that arise from and affect all stakeholders involved in the management and creation of infrastructure. However, the review affirms that these barriers can be addressed to create a step-change in the approach to utilising lower carbon solutions. The review sets out a number of initiatives to address the barriers based around several key themes including leadership, innovation and procurement.
- 2.1.4 We have adopted a range of measures to encourage and promote low carbon solutions and continue to promote the sustainability objective in order to “*maximise energy efficiency and minimise the carbon footprint of the project*”¹. Many of the key themes for which recommendations are made in the review have been integral to the development of the Thames Tideway Tunnel project, particularly during the procurement phase. As details around the structure and remit of the Infrastructure Provider are developed, we will ensure that responsibility for utilising low carbon solutions is embedded at the highest levels. The design and build nature of the contract allows the supply chain to propose innovative solutions during the detailed design process, subject to compliance with the other commitments made in the application for development consent.
- 2.1.5 The *Energy and Carbon Footprint Report* sets out the methodology and assumptions for calculating the carbon footprint. It also highlights planned measures to reduce the project’s carbon footprint. The review does not include any details that would impact on how the carbon footprint is dealt with or on our methodology and findings; however, it does highlight the high-level principles that are a consideration in delivering the low-carbon infrastructure.

¹ *Energy and Carbon Footprint Report*, Section 2, para. 2.4.2

- 2.1.6 Consequently, we consider that the Infrastructure Carbon Review does not materially impact on the *Energy and Carbon Footprint Report* and that no changes are required. However, we will continue to take the recommendations of the review into account, as appropriate, as the project develops.

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