



Thurrock Flexible Generation Plant

**Environmental Statement Volume 2
Chapter 5: Scoping and Consultation**

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Environmental Impact Assessment

Environmental Statement

Volume 2

Chapter 5

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Summary

This document summarises outcomes of the EIA scoping process and consultation undertaken concerning the proposed development during 2018 and 2019. It documents the key issues raised in scoping and consultation and refers to where those have been addressed in the EIA.

Qualifications

This document has been prepared by Anna Gillespie BSc (Hons), MSc, a Consultant who has three years' experience of planning consultancy and environmental impact assessment.

It has been checked by Tom Dearing, a Chartered Environmentalist and full Member of the Institute of Environmental Management and Assessment, who has eight years' experience of environmental impact assessment.

1. Introduction

1.1 Purpose of this chapter

1.1.1 This chapter of the Environmental Statement (ES) summarises the consultation undertaken concerning potential impacts of Thurrock Flexible Generation Plant. It refers to issues raised in the Planning Inspectorate (PINS) Scoping Opinion, consultee responses to the Preliminary Environmental Information Report (PEIR), and subsequent further consultation, showing where these have been responded to in the ES.

1.2 Stages of consultation

1.2.1 Pre-application consultation is an important requirement for development consent applications. It provides an opportunity for interested parties to comment on the proposals while they are at formative stage, and for potential issues to be taken into account and, where necessary, addressed before the application is submitted for examination.

1.2.2 In the course of preparing the application and during the environmental assessment process, a wide range of stakeholders have been consulted to agree the scope of the assessments, methodologies and possible mitigation measures, and to gather environmental data relevant to the topic-specific assessments.

1.2.3 The stages of consultation are described below.

Pre-scoping consultation

1.2.4 Thurrock Power has undertaken informal consultation with a number of interested parties since late 2016 to discuss the potential development proposals. Parties consulted have included:

- Anglian Water;
- The Department for Business, Energy and Industrial Strategy (BEIS);
- Environment Agency;
- Essex County Council;
- Essex Wildlife Trust;
- Highways England;
- Health and Safety Executive (HSE);
- Land owners;

- National Grid;
- Natural England;
- Network Rail;
- Open Spaces Society;
- PINS;
- Port of Tilbury London Ltd;
- RWE; and
- Thurrock Borough Council.

Scoping

1.2.5 Scoping is the process of identifying the issues to be addressed during the environmental assessment process. Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as amended, provides for an applicant to ask the Secretary of State to state in writing their opinion as to the information to be provided in an ES.

1.2.6 While there is no formal requirement in the Regulations to seek a Scoping Opinion or produce a Scoping Report prior to the submission of an ES, it is recognised as good practice to do so. The EIA scoping stage where the main or significant likely effects are identified, is an important preliminary procedure and sets the context for the EIA process.

1.2.7 A request for a scoping opinion with accompanying Scoping Report was accepted by PINS on 9 August 2018. The Scoping Opinion was provided by PINS on 20 September 2018. As part of the scoping process, PINS requested opinions from the statutory consultation bodies, which informed the Scoping Opinion issued by PINS.

PEIR consultation

1.2.8 The applicant published a PEIR in October 2018, which formed the basis of consultation undertaken pursuant to sections 42, 43 and 47 of the Planning Act 2008, which is a statutory stage of the pre-application consultation. The consultation commenced on 16 October 2018 and concluded on 14 November 2018.

1.2.9 It included public information events, availability of the PEIR at a number of deposit locations and the applicant's website, and correspondence with individual consultees. The consultation was advertised in local and national newspapers and via leaflet to addresses within a defined local consultation area. Details of the consultation process are provided in the Consultation Report (application document A5.1).

Subsequent further consultation

- 1.2.10 Subsequent to the PEIR consultation in 2018, certain changes to the proposed development were made as a result ongoing design work, responses received to PEIR consultation and input from specialist bodies. The main changes comprised different construction access routes for the development, changes to the areas of habitat enhancement and Exchange Common land, and refinements to the gas pipeline route.
- 1.2.11 The changes were described in the Project Changes Report, October 2019, which is reproduced in the Consultation Report (application document A5.1).
- 1.2.12 Further targeted consultation was undertaken in October and November 2019 with prescribed and non-prescribed consultees whose area of responsibility, expertise or location was affected by the design changes. This included re-engagement with statutory consultees that had made inputs to the Scoping Opinion where there was potential for the project changes to materially affect the advice given at the time of scoping.

Examination

- 1.2.13 Once the application has been accepted by PINS for examination, there is a further opportunity for interested parties to make representations to PINS concerning the proposed development during the examination phase in 2020, prior to a decision being taken on granting consent.

2. EIA Scoping

2.1 Scoping request

2.1.1 As set out above, a request for a formal Scoping Opinion was made to PINS in August 2018. This was based on a Scoping Report, which set out the findings of the scoping process undertaken. The objectives of the Scoping Report were to:

- identify potential environmental issues associated with the proposed development;
- identify those environmental issues which should be considered further in the final reports to accompany the planning application;
- provide a basis for consultation, where appropriate, with statutory and non-statutory consultees on the relevant environmental issues for the purposes of environmental assessment;
- define the methods to be used to assess the environmental effects of the proposed development; and
- where appropriate, agree these methods with statutory and non-statutory consultees.

2.2 Scoping workshops

2.2.1 In addition to the scoping request, workshops were held with key consultees to discuss specific environmental topics prior to receipt of the Scoping Opinion.

2.2.2 Workshops were held with Thurrock Borough Council officers and representatives of the Environment Agency and Highways England on Wednesday 8 August and Thursday 30 August 2018 at the Thurrock Borough Council Civic Offices in Essex. The workshops each included a description of the proposed development and summary of baseline studies. The following topic areas were covered:

- air quality;
- noise;
- transport;
- drainage and flood risk;
- ground contamination;
- landscape and visual impacts; and
- ecology and biodiversity.

2.2.3 Three key points arising from these workshops influenced the subsequent development design, PEIR studies and final ES.

2.2.4 A potential alternative construction access route between St Chad's Road and Gun Hill was discussed with Thurrock Borough Council highways department and Highways England. This suggested route then formed part of the proposed development design assessed at PEIR stage. Subsequently, however, access from the south via the Tilbury2 and former Tilbury B Power Station sites has become possible and the haul road between St Chad's Road and Gun Hill is no longer required or proposed.

2.2.5 Thurrock Borough Council public health officers noted the potential for cumulative impacts with other major developments proposed locally, relatively high levels of socio-economic deprivation, high baseline rates of respiratory disease, and also the potential benefits of employment generation. A public health assessment was requested for the EIA scope, which is provided at Volume 3, Chapter 13: Human Health.

2.2.6 Potential ecological impacts of once-through cooling using the River Thames were discussed, in combination with the same approach proposed (at that time) for the Tilbury Energy Centre development. Further study of once-through cooling has shown that it is not feasible for the proposed development on technical and cost-benefit grounds, and it does not form part of the proposed design. Further details of the alternatives considered are set out in Volume 2, Chapter 3: Consideration of Alternatives. Advice concerning potential impacts of creating a structure in the Thames has remained relevant, in part, due to the causeway construction now proposed. Marine environment impacts are assessed in Volume 3, Chapter 17: Marine Environment.

2.3 Scoping Opinion

2.3.1 The Scoping Opinion was received from PINS on 20 September 2018. The following bodies were formally consulted by PINS as part of this process:

- The Health and Safety Executive;
- NHS England;
- Thurrock Clinical Commissioning Group;
- Natural England;
- Historic England;
- Essex County Fire and Rescue Service;
- Essex Police and Crime Commissioner;
- The Environment Agency;
- The Maritime and Coastguard Agency;
- Marine Management Organisation;
- The Civil Aviation Authority;
- Thurrock Council;

- Highways England;
- Transport for London;
- Trinity House;
- Public Health England;
- The Crown Estate;
- Forestry Commission;
- Ministry of Defence;
- Royal National Lifeboat Institution;
- relevant statutory undertakers; and
- Local authorities.

2.3.2 The following organisations provided a response to PINS within the statutory timeframe:

- Castle Point Borough Council;
- Civil Aviation Authority;
- Environment Agency;
- ESP Utilities Group;
- Essex County Council;
- Essex Fire and Rescue;
- Forestry Commission;
- Gravesham Borough Council;
- Health and Safety Executive;
- Highways England;
- Historic England;
- Marine Management Organisation;
- Maritime and Coastguard Agency;
- NATS En-Route Safeguarding;
- Natural England;
- National Grid Electricity Transmission;
- Port of London Authority;
- Port of Tilbury;
- Public Health England;
- Royal Mail;
- Thurrock Council; and
- Trinity House.

2.3.3 Table 2.1 summarises the overarching and cross-cutting points raised by PINS and in consultee responses through the Scoping Opinion, setting out how and where these are addressed in the ES or through the development design.

2.3.4 Details of how points raised with regard to specific environmental assessments have been addressed in the ES are given in Section 3.4 of each topic chapter in Volume 3.

Table 2.1: Cross-cutting issues in Scoping Opinion.

Consultee and issue raised	How and where addressed in the ES
<p>PINS – The description of the proposed development and the assessment of significant effects should include all design characteristics and parameters applicable to the entire development. The ES should also explain the anticipated routes for consenting for any elements of the proposed development that do not form part of the DCO Application. (paragraph 2.2.3)</p>	<p>Details of the proposed development are included within Volume 2, Chapter 2: Project Description of the ES.</p> <p>Other required consents and licenses, to be obtained outside the DCO application, are listed in the Other Consents and Licenses Statement (application document A7.7).</p>
<p>PINS – The description of the proposed development should be developed in the ES to include details of how the construction would be phased, including the likely commencement data, duration and location of the required activities (paragraph 2.2.4). The ES should provide details of the anticipated construction working hours (including any night time working required) and activities on which the assessments of likely significant effect have been based (paragraph 2.2.5).</p>	<p>Details of the required construction activities, construction working hours and potential phasing are included in Volume 2, Chapter 2: Project Description and in the Code of Construction Practice (application document A8.6).</p>
<p>PINS – The ES should describe the lighting requirements for all elements and phases of the proposed development. It should be explained what measures are proposed to minimise light spill into the surrounding area (paragraph 2.2.9).</p>	<p>Details for the operational lighting requirement for the proposed development are included in Volume 2 Chapter 2: Project Description. Construction phase lighting measures are included in the Code of Construction Practice (application document A8.6).</p>
<p>PINS – A detailed description of the alternative sites considered in the sequential site search exercise should be included in the ES, as well as a description of the reasonable alternative technologies considered (paragraph 2.2.18).</p>	<p>Details of the alternatives considered for the proposed development are included in Volume 2, Chapter 3: Consideration of Alternatives.</p>

Consultee and issue raised	How and where addressed in the ES
<p>PINS – Where uncertainty exists and flexibility is sought, the ES should clearly set out the design characteristics and parameters that would apply, and how these inform the assessment in the ES. Where the details of the Proposed Development cannot be defined precisely, the Applicant should apply a worst case scenario relative to each aspect chapter (paragraph 2.2.19)</p>	<p>The overall design parameters and limits of deviation are set out in Volume 2, Chapter 2: Project Description and shown on the Works Plans (application document A2.3). Within each topic chapter in Volume 3, Table 2.2 details the specific maximum design envelope parameters relevant to that assessment.</p>
<p>PINS – Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed (paragraph 3.1.4).</p>	<p>The outcomes of consultation to date and details of proposed mitigation have been considered with Section 3.4 and Section 4.9 of each of the individual topic chapters (Volume 3, Chapters 6 to 17) of this ES, respectively. A consolidated list of mitigation measures is provided in Volume 6, Appendix 2.1: Mitigation, Enhancement and Monitoring Commitments.</p>
<p>PINS – The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters (paragraph 3.3.10).</p>	<p>The overarching methodology is set out in Section 2 of Volume 2, Chapter 4: EIA Methodology. Any topic-specific departures from that methodology are described in Section 2.5 of the respective topic chapter in Volume 3.</p>
<p>PINS – Where the ES relies upon mitigation measures which would be secured through a management plan/strategy, it should be demonstrated (with clear cross-referencing) where each measure is set out in the document (paragraph 3.3.14).</p>	<p>Cross-references to management plans or strategies to secure mitigation measures are provided in Table 5.1 of each ES topic chapter (Volume 3, Chapters 6 to 17) and the consolidated list of mitigation measures is provided in Volume 6, Appendix 2.1.</p>
<p>PINS – Any proposals for mitigating and/or monitoring the impacts from the cooling water system should be described within the ES (section 4.7.8).</p>	<p>The intake cooling pipe/cooling water system no longer forms part of the proposed development.</p>
<p>PINS - The Inspectorate considered that additional justification should be provided to support that the use of the existing/consented new jetty, in terms of the anticipated number and frequency of deliveries and the cumulative impact with other developments (section 4.7.4).</p>	<p>The use of the existing/consented jetty for delivery is no longer proposed. Construction of a new causeway is proposed and the effects have been assessed in the ES in Volume 3 and Volume 4 (for cumulative impacts).</p>

Consultee and issue raised	How and where addressed in the ES
<p>PINS – An assessment of likely significant effects arising from the vulnerability of the Proposed Development to major accidents or disasters from fire and explosion risks should be provided in the ES where significant effects are likely. The ES should contain clear cross referencing to where the assessment of major accidents or disasters is located (section 4.12).</p>	<p>Regulation and management of fire and explosion risk is set out in Volume 6, Appendix 2.2: Accident and Emergency Management. As discussed in Section 2.8 of the Project Description in Volume 2, Chapter 2, accidents or disasters (with significant effects) are not considered likely. Volume 3, Chapter 15: Hydrology and Flood Risk assesses potential for significant effects due to flooding, including tidal and storm surge vulnerability.</p>

2.3.5 Table 2.2 summarises the environmental topic areas scoped out of the ES on the basis that no likely significant environmental effects are expected. Within each topic chapter in Volume 3 (Chapters 6 to 17), Section 4.8 details any further specific effects within that topic area that have been scoped out.

Table 2.2: Environmental topics scoped out.

Topic area	Reason topic scoped out
Material assets and natural resources	No existing infrastructure or assets apart from Common Land and agricultural land would be significantly affected. Agricultural and Common Land impacts are assessed in the Land Use chapter. The principal resource consumed in operation would be natural gas, with impacts of its consumption on climate change assessed in the Climate Change chapter. No separate chapter is required.
Aviation	No potential for likely significant effects given distance to airports and presence of other taller structures nearby.
Heat	There is no potential for likely significant environmental effects due to heat (cooling water discharge is no longer proposed).
Combined heat and power (CHP)	The proposed development is inherently unsuited to CHP due to its intermittent, peaking operation, so no development of CHP is proposed or considered feasible and no assessment of environmental impacts of the development of CHP infrastructure is required. Further information about CHP infeasibility is provided in the CHP Report, application document A7.5.

Topic area	Reason topic scoped out
Carbon capture and storage (CCS)	Land-take required for carbon capture readiness (CCR) will be assessed. Details of specific CCS development within the CCR land cannot be established with sufficient certainty for assessment purposes, and such a development, if sought in the future, would be subject to development control and EIA if required at the time. Assessment of CCS is therefore not made.

2.3.9 In view of the additional direct consultation in 2019 with the organisations having the remit to advise on scope of studies affect by the project changes, and on review of the applicability of the 2018 Scoping Opinion, the applicant has not considered that it was necessary to request an updated Scoping Opinion from PINS.

2.3.6 A number of changes have been made to the proposed development design since preparation of the Scoping Report and receipt of the Scoping Opinion, with the key changes being:

- removal of the proposed once-through water cooling pipeline and intake/outfall;
- removal of northern construction access routes on minor roads and via temporary haul roads;
- addition of southern construction access routes via Tilbury2 and a new causeway in the Thames;
- separation of the Exchange Common Land and habitat creation land; and
- refinement of the gas pipeline route (largely within the wider route corridor initially considered at scoping stage).

2.3.7 The scope of the assessment as set out in the Scoping Opinion is considered still to be applicable. Scoping advice concerning need to assess marine environment impacts (for the now-removed water cooling pipeline and intake/outfall) remains broadly applicable to the causeway now proposed.

2.3.8 In 2019 the applicant has held further direct consultation with organisations whose inputs informed the 2018 Scoping Opinion in order to discuss project changes and the approach to further assessment work undertaken. This further consultation has been through the formal section 42 re-consultation process and through three consultation workshops with:

- Highways England and Thurrock Highways Authority on 30 July 2019 concerning proposed construction access via A1089 to Tilbury2 private road;
- Environment Agency on 12 November 2019 concerning causeway design, flood defence wall alterations and marine environment impact assessments and saltmarsh creation; and
- the Port of London Authority on 11 February 2020 concerning the proposed causeway design and use, barge traffic, licensing and dredging.

3. Consultation

3.1 Introduction

3.1.1 Under the Planning Act 2008, as amended, the applicant has a duty to consult on and publicise the proposed development. The key statutory requirements in respect of pre-application consultation and publicity are as follows:

- *Section 42 Duty to consult* – consultation with prescribed bodies (e.g. Natural England, Environment Agency, Historic England), local authorities (section 43), landowners and others with interests in the land (section 44);
- *Section 47 Duty to consult local community* – consultation with the local community in accordance with the Statement of Community Consultation (SoCC); and
- *Section 48 Duty to publicise* – publicity of the proposed development.

3.1.2 The applicant's PEIR was published in October 2018 and was provided to Section 42 and 47 consultees. In addition, the applicant produced a 'Have Your Say' consultation booklet describing the proposed development for a general readership.

3.2 Statutory consultation

3.2.1 In accordance with Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, the following statutory consultees were consulted during October and November 2018.

- Basildon Borough Council
- Brentwood Borough Council
- Castle Point Borough Council
- Dartford Borough Council
- East of England Ambulance Service NHS Trust
- Essex County Council
- Essex County Fire and Rescue Service
- Essex Police and Crime Commissioner
- Forestry Commission England
- Forth Ports (Port of Tilbury)
- Gravesham Borough Council
- Highways England
- Highways England Historical Railways Estate
- Historic England
- Homes England

- Kent County Council
- Kent Downs AONB
- London Borough of Bexley
- London Borough of Havering
- Medway Council
- NATS Safeguarding
- Natural England
- Network Rail Infrastructure Ltd
- NHS England
- NHS Thurrock Clinical Commissioning Group
- Parish councils
- Port of London Authority
- Public Health England
- Relevant statutory undertakers
- Royal Mail Group
- The Civil Aviation Authority
- The Crown Estate
- The Environment Agency
- The Greater London Authority
- The Health and Safety Executive
- The Lead Local Flood Authority (Essex County Council)
- The Marine Management Organisation
- The Maritime and Coastguard Agency
- The Ministry of Defence
- Thurrock Council
- Transport for London
- Trinity House

3.3 Public consultation and exhibitions

3.3.1 Thurrock Power published a Statement of Community Consultation (SoCC), agreed with Thurrock Borough Council, that sets out how local communities will be consulted concerning the proposed development.

3.3.2 Public consultation took place between 16 October and 14 November 2018. A number of public exhibitions were held, as set out in Table 3.1, and publicised through newspaper notices and letters to addresses within the consultation area defined in the SoCC. Consultation documents including the PEIR were available to view at these public exhibitions and also at four local public venues during the consultation period.

3.3.3 Consultation comments were recorded at the exhibitions and via a postal address, email address and telephone number.

Table 3.1: Details of public exhibitions held as part of public consultation.

Date	Location	Venue address	Time of session
Tuesday 16 October 2018	Gravesend	The Court Room, Gravesend Old Town Hall, High Street, Gravesend, DA11 0AZ	11:00 – 20:00
Tuesday 23 October 2018	West Tilbury	West Tilbury Village Hall, Rectory Road, West Tilbury, RM18 8UD	11:00 – 20:00
Friday 2 November 2018	Tilbury Hub	Tilbury Hub, 16 Civic Square, Tilbury, RM18 8ZZ	11:00 – 20:00
Wednesday 7 November 2018	Linford	Linford Village Hall, Lower Crescent, Linford, SS17 0QP	11:00 – 17:30

3.4 Further consultation in 2019

3.4.1 Thurrock Power consulted PINS and Thurrock Council in advance of further consultation taking place to agree the approach to be taken. A further s46 Notice was sent to the Secretary of State and a second s48 Notice was published.

3.4.2 Targeted further consultation took place between 11 October and 11 November 2019. Consultation letters were sent to all statutory and non-statutory consultees who were consulted in 2018 and to certain additional statutory and non-statutory consultees identified as those who might be affected by the design changes made subsequent to production of the PEIR. All s47 local community consultees who responded to the 2018 consultation were also consulted in 2019.

3.4.3 Consultation documents, including a Project Changes Report, were available to view at four local public venues and on the project website throughout the further consultation period.

3.4.4 Consultation comments were recorded via postal and email addresses and a telephone number.

3.5 Section 42 and other organisations' consultation responses

3.5.1 The following consultees responded to the 2018 and 2019 consultation requests.

- Anglian Eastern Regional Flood and Coastal Committee

- Anglian Water
- Basildon Council
- Brentwood Borough Council
- British Telecom
- Cadent Gas Limited
- Canal and River Trust
- Castlepoint Borough Council
- Century Link Communications
- Chadwell St Mary Primary School
- Civil Aviation Authority
- Cogent Land LLP
- Colt Technology Services
- Environment Agency
- ESP Gas Group Ltd
- Essex and Suffolk Water
- Essex Chambers of Commerce
- Essex County Council
- Essex County Fire and Rescue Service
- Essex Field Club
- Forestry Commission
- Gateway Academy
- Gravesham Borough Council
- Harlaxton Energy Networks Ltd
- Health and Safety Executive
- Highways England
- Historic England
- Indigo Pipelines
- Instalcom
- Kent & Essex Inshore Fisheries and Conservation Authority (IFCA)
- Kent County Council
- Kent Downs AONB
- Kier Properties
- London Borough of Bexley
- Lower Thames Crossing
- Marine Management Organisation
- Medway Council
- Ministry of Defence
- National Grid

- NATS Ltd
- Natural England
- Network Rail
- Open Spaces Society
- Our Lady Star of the Sea Roman Catholic Church
- Port of London Authority
- Port of Tilbury London Ltd
- Public Health England
- Royal Mail Group
- Royal Society for the Protection of Birds
- RSPB
- RWE
- Thurrock Council
- Transport for London
- Trinity House
- UK Power Networks
- Virgin Media
- Wales and West Utilities
- WELCOM Forum
- West Tilbury Commons Conservators

3.5.2 Details of points raised with regard to specific environmental assessments¹ and how these have been responded to in the ES are given in Section 3.4 of each topic chapter in Volume 3.

3.5.3 Table 3.2 summarises other cross-cutting environmental impact points raised, setting out how and where these are addressed in the ES or through the development design.

Table 3.2: Cross-cutting issues raised by s42 consultees and other organisations.

Cross-cutting issue raised	How and where addressed in the ES and/or design
Importance of assessing impacts of Thurrock Flexible Generation Plant together with other cumulative developments, in view of significant development activity proposed and occurring locally.	Volume 4 of the ES provides the assessments of cumulative effects for each environmental topic area, in greater detail than at PEIR stage.

¹ Other non-environmental points raised, such as protective provisions for utilities within the development boundary, are not discussed here.

Cross-cutting issue raised	How and where addressed in the ES and/or design
Support for the principle of using river transport for construction delivery, subject to impact assessments including ecological, navigation, noise, visual and conservation of such an operation.	Causeway is proposed for deliveries by barge. Environmental impacts are assessed in respective topic chapters in Volume 3, including new topic chapter added since PEIR concerning marine environmental impacts.
Recommendation that net biodiversity gain should be sought as part of the development plans.	Retained, enhanced and compensatory habitat has been designed to achieve overall biodiversity net gain as detailed in Volume 6, Appendix 9.3.
Requirement to assess and minimise construction traffic impacts on strategic and local highway network.	New access proposals have been developed since the PEIR stage, providing a primary construction access direct from the strategic highway network (A1089) in conjunction with the Tilbury2 development, and use of barge deliveries to minimise local road network disruption from movement of abnormal loads. Construction traffic impacts are assessed in Chapter 10 of Volume 3.
Requirement to undertake appropriate assessments of impacts on water body and European designated site status, under the Water Framework Directive and Habitats Regulations.	Assessments are provided in application document A5.2 (HRA) and ES Volume 6, Appendix 17.3: (WFD assessment).

3.6 Section 47 local community consultation responses

3.6.1 Table 3.3 summarises the themes of responses by section 47 consultees in 2018 and 2019, setting out how and where these are addressed in the ES or through the development design.

3.6.2 Full detail of these consultation responses is provided in the Consultation Report (application document A5.1).

Table 3.3: s47 consultation response themes.

Response theme	How and where addressed in the ES and/or design
Concerns regarding increased use of local highways network and, in particular, local roads which are unsuitable for HGVs and/or increased volume of traffic and the safety of HGV access at Gateway Academy roundabout.	During the stages of design and consultation a number of different road access routes were proposed and amended in response to feedback and further design. The access as now proposed in the application provides a direct connection to the strategic highway network for construction traffic and involves barge delivery for abnormal loads, in both cases avoiding impacts on local roads that had previously been proposed (including the Gateway Academy roundabout). Traffic and transport impacts are assessed in Volume 3, Chapter 10.
Air pollution impacts, in particular cumulative air pollution with existing sources and proposed developments locally; concerns regarding human health effects.	Air pollution impacts and potential effects on human health, including the cumulative impact with other proposed developments, are assessed in chapters 12 and 13 in Volume 3 and chapters 25 and 26 in Volume 4. The Stack Height Determination (Volume 6, Appendix 12.3) sets out how the height of the gas engine exhaust stacks has been chosen to provide appropriate dispersion and dilution of air pollutant emissions.
The impact of noise pollution during construction and operation.	The impacts of noise during construction and operation are assessed in Volume 3, Chapter 11.
Loss of common land and green belt, including effects on local wildlife and displacement of grazing horses.	The proposed development provides Exchange Common Land that exceeds in size the area of temporary and permanent loss. In addition, a new permissive path access from Fort Road will improve recreational access to this and other areas of local access land in the green belt. Impacts on and mitigation for loss of common land are detailed in Volume 3, Chapter 8 and Volume 6, Appendix 8.2. The Statement of Case and Green Belt Statement (application document A8.3) detail effects on the green belt.
Impacts on cultural heritage and archaeology; importance of safeguarding Tilbury Fort.	Impacts on cultural heritage and archaeology are assessed in Volume 3, Chapter 7, and Tilbury Fort is noted as a receptor of high sensitivity. Pre-application geo-archaeological investigation has been undertaken (Volume 6, Appendix 7.2); local heritage officers and Historic England have been consulted concerning the scope of a further Written Scheme of Investigation for work to be undertaken prior to construction.
The visual impact of the development.	Visual and landscape impacts are assessed in Volume 3, Chapter 6. The main development site layout has sought to minimise visual impact through the orientation of the exhaust stacks and the detailed design will use a suitable colour palette to reduce the visibility of buildings and stacks against the backdrop/sky, in consultation with Thurrock Council. This is discussed in the Design Principles Statement (application document A8.4). Landscape planting is proposed to screen views and provide ecological benefits; this is detailed in the Outline Landscape Management Plan (application document A8.8).

Response theme	How and where addressed in the ES and/or design
Impact on habitats and biodiversity; specific comments on protected species or habitats and available data sources.	Impacts on habitats and biodiversity are assessed in Volume 3, Chapters 9 and 17, and in the Report to Inform an Appropriate Assessment (the Habitats Regulations Assessment; application document A5.2). Chapter 9 and the ecology baseline report (Volume 6, Appendix 9.1) detail the data sources consulted concerning habitats and species. As discussed in Chapters 9 and 17, the development proposes to provide net biodiversity gain through habitat enhancement and creation in the onshore and marine environments; details of habitat enhancement/creation and mitigation for impacts on protected species are given in Volume 6, Appendix 9.3 Biodiversity Net Gain, the Outline Ecological Management Plan (application document A8.7) and the Saltmarsh Enhancement and Maintenance Plan (application document A8.10).
Comments concerning the need for the development in the proposed location.	The Statement of Case and Green Belt Statement (application document A8.3) set out the need for the proposed development, the site selection process, and the limited impact on the purposes of the Green Belt.
Comments in support of the development, flexible generation/storage and the facilitation of green energy sources.	This is noted.
Potential benefits to the local community; but concern for falling property values.	The benefits of employment generation and investment during construction are assessed in Volume 3, Chapter 8. The Statutory Nuisances Statement (application document A7.1) considers potential nuisance effects at properties and concludes that none are anticipated.