RIVERSIDE ENERGY PARK
BELVEDERE
PRELIMINARY ENVIRONMENTAL INFORMATION REPORT
NON-TECHNICAL SUMMARY
JUNE 2018
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1 INTRODUCTION

This document is the Non-Technical Summary of the Preliminary Environmental Information Report (PEIR) for a proposed Energy Park at Norman Road in Belvedere within the London Borough of Bexley. The Energy Park is called Riverside Energy Park (REP). REP is also described in this document as the ‘Proposed Development’.

This document provides, in non-technical language, a summary of the information included within the Preliminary Environmental Information Report (see below for further information). It has been prepared by Peter Brett Associates on behalf of Cory Environmental Holdings Limited (trading as Cory Riverside Energy and referred to as ‘Cory’ or ‘the Applicant’ throughout this document).

Cory is a leading recycling, energy recovery and resource management company with an extensive river logistics business based in London.

Cory operates the existing Riverside Resource Recovery Facility (RRRF) situated at Norman Road in Belvedere. RRRF is a key element of London’s energy and resource management infrastructure and has been operating highly successfully since 2011.

REP seeks to maximise the use of Cory’s existing energy and river infrastructure including its operational jetty, tugs, barges. REP will help meet London’s pressing need for further resource recovery and energy generation infrastructure.

Further information on Cory and on the Proposed Development is available at www.riversideenergypark.com.

The Proposed Development is made up of a number of integrated energy generating components and would comprise:

- an Energy Recovery Facility (ERF);
- an Anaerobic Digestion facility;
- a Solar Photovoltaic Installation;
- Battery Storage; and
- Enabling infrastructure for Combined Heat and Power to the site boundary to provide for a potential future district heating pipe connection.

More information on the different elements of REP is included in Section 2 to this Non-Technical Summary.

REP would generate up to 96 megawatts of electricity, based on current technology solutions. Most of the electricity generated will be exported to the existing National Electrical Transmission System. Therefore, an electrical connection is needed to connect REP to an electricity grid connection point. Some of the electricity generated will be utilised on site.

As REP is an onshore generating station which will have a capacity of more than 50 megawatts of electricity, it is classified as a Nationally Significant Infrastructure Project under the Planning Act 2008. The Planning Act 2008 requires a Development Consent Order to authorise the construction and operation (including maintenance) of REP. Cory is the Applicant for REP.

Plans showing the location and an Indicative Application Boundary for the Proposed Development are provided in Figures 1 and 2 of this Non-Technical Summary.
Environmental Impact Assessment

The Proposed Development is classified as ‘Environmental Impact Assessment development’ (EIA development) under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (described in the rest of this document as the ‘Infrastructure EIA Regulations 2017’).

Cory is required to undertake an Environmental Impact Assessment (EIA) for the Proposed Development. This process assesses the likely significant environmental impacts of the Proposed Development across a range of topics. The results of the EIA will be presented in an Environmental Statement which will be submitted with the application for a Development Consent Order (expected submission late 2018).

In January 2018, the Secretary of State provided Cory with a formal opinion (a ‘Scoping Opinion’) on what should be included within the Environmental Impact Assessment. This Scoping Opinion was informed by comments from statutory bodies and other stakeholders.

A Preliminary Environmental Information Report has been prepared as part of the pre-application consultation. It sets out the preliminary environmental information and the preliminary findings of the Environmental Impact Assessment undertaken to date. The Preliminary Environmental Information Report allows consultees to develop an informed view of the likely significant environmental effects of the Proposed Development and provide any comments on the preliminary findings during the statutory consultation process. This enables Cory to take these comments into account when finalising its proposals before any application is made to the Secretary of State.

Decision Making Process

Cory is applying for a Development Consent Order under Section 31 of the Planning Act 2008 for powers to construct and operate (including maintenance) REP. Cory must submit an application for a Development Consent Order to the Planning Inspectorate, the government body responsible for operating the planning process for Nationally Significant Infrastructure Projects, who will first decide whether to accept the application for examination. If accepted for examination, the Planning Inspectorate will appoint an independent Inspector or panel of Inspectors (known as the Examining Authority) to examine the application on behalf of the Secretary of State. The examination is a public process, in which interested parties are able to participate.

Following the examination, the Examining Authority will make a recommendation to the Secretary of State. The Secretary of State must determine the application in accordance with the relevant National Policy Statements for the Proposed Development. These National Policy Statements (NPSs) set out the Government’s policy and expectations for Nationally Significant Infrastructure Projects.
Planning Policy Context

Due to the nature of the Proposed Development, three of the designated National Policy Statements for energy are relevant to the determination of this application:

- **Overarching National Policy Statement for Energy (EN-1):** This sets out the overarching national policy for energy infrastructure as defined by the Planning Act 2008, which provides the primary basis for decisions by the Secretary of State;

- **National Policy Statement for Renewable Energy Infrastructure (EN-3):** Applies to nationally significant energy from biomass/waste infrastructure in England and Wales with at least 50 MW electrical generating capacity; and

- **National Policy Statement for Electricity Networks Infrastructure (EN-5):** Applies to electricity networks in England with a voltage of 132 kV or higher which are carried on towers/poles or buried underground, as well as associated infrastructure including substations and converter stations.

In deciding this application, the Secretary of State is also required to have regard to any other matters which the Secretary of State thinks are both important and relevant to the decision. Paragraph 4.1.5 of the Overarching National Policy Statement for Energy EN-1 clarifies that local authorities’ Development Plan Documents or other documents in their Local Development Framework may be both important and relevant considerations to the Secretary of State’s decision-making.

Accordingly, the Preliminary Environmental Information Report and this Non-Technical Summary have been prepared with reference to relevant European, national, regional and local policy. Further details of these are contained within Chapter 2 of the Preliminary Environmental Information Report.

If the Secretary of State decides to grant the development consent through a Development Consent Order, this would authorise the construction and operation (including maintenance) of the Proposed Development.
2 OVERVIEW OF THE PROJECT

Introduction

The Application Site for the Proposed Development would include the following:

- the REP site, located to the north of Belvedere off Norman Road;
- the Main Temporary Construction Compounds located to the south of the REP site and west of Norman Road;
- the Electrical Connection, running underground between the REP site and the Electrical Connection Point at Littlebrook substation connecting into an existing National Grid building in Dartford; and
- Cable Route Temporary Construction Compounds required to support the construction of the chosen Electrical Connection route. These will be small discrete compounds, required for a period of time whilst works are undertaken along particular lengths of the Electrical Connection route.

The Proposed Development would be located within the administrative areas of the London Borough of Bexley and Dartford Borough Council. The extent of the Application Site is shown on Figure 2 of this Non-Technical Summary.

Description of the Application Site

The REP Site and Main Construction Compounds

The REP site is bounded to the north by the River Thames and the Thames Path long distance trail, and to the south and west by the Crossness Local Nature Reserve. The existing Thames Water Crossness Sewage Treatment Works site is approximately 200 m further to the west which includes the Grade I listed Crossness Pumping Station.

The Crossness Local Nature Reserve is a 25.5 ha local nature reserve which is part of the Erith Marshes Site of Metropolitan Importance for Nature Conservation, and contains a number of ditches, watercourses and ponds.

To the south of the REP site is Norman Road (the main road access into the site). The proposed Main Temporary Construction Compounds would be located in an area of previously developed land to the west of Norman Road.

The land west off Norman Road also includes land owned by the Applicant which has existing planning permission for a Data Centre (Local Planning Authority reference: 15/02926/OUTM).

South of Norman Road is the A2016, formed by the dual carriageway Picardy Manor Way at its junction with Norman Road (North), and by the dual carriageway Eastern Way, south of Crossness Local Nature Reserve.

The REP site includes the existing jetty extending out into the River Thames but excludes the existing RRRF main building itself. The majority of the REP site is used for private vehicle circulation areas, the jetty access ramp, staff and visitor parking, open container storage, contractor maintenance, electrical substation and associated landscape/habitat areas.

Electrical Connection

The proposed Electrical Connection route would run southeast from the REP site towards the existing Littlebrook substation, in Dartford. There are a number of alternative proposed route options that have been identified and assessed through studies undertaken by UKPN, the local distribution network operator, and are shown in Figure 1.

Further detail about the REP site and surrounding area is provided in Chapter 3 of the Preliminary Environmental Information Report.
Description of the Proposed Development

Energy Recovery Facility

An Energy Recovery Facility is an industrial plant which utilises thermal treatment technology (combustion) to process various types of waste and generate electricity. Electricity generated is normally exported to the existing electricity network, after a small amount of electricity has been used to run the plant itself.

The Energy Recovery Facility at REP would normally treat non-recyclable Commercial and Industrial waste, and would have the potential to accept non-recyclable municipal (household) solid waste.

The image below provides an indicative schematic of the components required for an Energy Recovery Facility.
Anaerobic Digestion Facility

An Anaerobic Digestion facility processes food and green waste through the degradation of waste by natural organisms. Biogas is generated as a useful by-product which can be used to generate renewable electricity.

The REP Anaerobic Digestion facility will accept local food and green waste.

The Anaerobic Digestion facility will also create a digestate by-product. Subject to suitable treatment the digestate could be used as agricultural fertiliser or used within the facility itself to sustain an effective digestion process. Any digestate that cannot be used as agricultural fertiliser could be treated in the Energy Recovery Facility.

The image below provides an indicative schematic of the components required for an Anaerobic Digestion facility.

Solar Photovoltaic Installation

Solar photovoltaic modules (solar panels) convert solar radiation directly into electricity, in a silent and clean process that requires no moving parts.

Inclusion of solar panels at REP will increase the renewable energy generation capacity of the Proposed Development.

Solar panels would be located on the primary building roof areas of the Main REP building. Initial studies demonstrate that high specification solar photovoltaic modules would be capable of generating up to 1.2 MWe (equivalent to electricity for approximately 1,100 homes), depending on the final building form that’s selected.
Battery Storage

The battery storage component of REP would store and supply additional power to the offsite distribution network at times of peak electrical demand. This would be integrated into the Main REP building and the batteries would be charged during low power demand periods directly from the energy produced from the Energy Recovery Facility, solar photovoltaic panels and the Combined Heat and Power engine (if present/generating).

Charged battery storage component would also provide a stand-by generation capability during times when the Energy Recovery Facility is not operating (e.g. during routine shut down periods).

The battery storage system would increase the operational performance and reliability of REP and provide an enhanced balance of supply and demand. Such energy storage benefits the entire power supply network from generation, transmission and distribution to all users. The image below shows a typical battery storage unit.

Combined Heat and Power Connection

REP would include all the necessary infrastructure within the REP site to supply a potential local district heating network. The heat supply system would be included and able to export up to 30 MWt of heat to local offsite consumers (which will enable the heat generated at the Energy Park to be supplied to c. 10,500 local homes and businesses).

The Applicant is in discussions with the relevant local authorities and housing developers to explore opportunities for REP to provide a local heat connection.

A dedicated and integrated heat supply system would also be provided to support the Anaerobic Digestion process.
The Electrical Connection Route

REP would be connected via a new 132 kilovolt (kV) connection to the existing electricity distribution network (‘the Electrical Connection’). It is proposed that the Electrical Connection would be routed predominantly via the existing road network and would be underground, except for the connection point with REP itself, and at the connection point to the electricity distribution network.

Temporary Construction Compounds

Two forms of Temporary Construction Compounds would be required:

- the Main Temporary Construction Compounds; and
- the Cable Route Temporary Construction Compounds.

The connection would require a new substation within the REP site. However, the connection to the electricity distribution network would be made into an existing National Grid substation building (the existing Littlebrook substation) with no external alterations required. The image below shows the existing Littlebrook substation.
REP Key Operations

Delivery of Waste to REP

The transport of waste inputs to the Energy Recovery Facility would predominantly be undertaken via the River Thames and the existing jetty at Belvedere. This will maximise the use of Cory’s existing fleet of tugs, barges, containers and wharves. The existing jetty has sufficient capacity to support the proposed throughput to REP (up to 805,000 tonnes per annum) without modification or any construction works required in the river.

Food and green waste for the Anaerobic Digestion facility would be collected from local sources, and delivered by road.

Removal of by-products from REP

By-products from the Energy Recovery Facility would include Incinerator Bottom Ash and Air Pollution Control Residues. Incinerator Bottom Ash would be removed from the REP site via barges along the River Thames to the Port of Tilbury; once again utilising the existing jetty. Air Pollution Control Residues from the Energy Recovery Facility and digestate from the Anaerobic Digestion facility would be removed by road.
3 ASSUMPTIONS AND ASSESSMENT TERMINOLOGY

Introduction

The preliminary environmental assessment includes a number of assumptions. This Section sets out these key assumptions and outlines how the Proposed Development has been assessed.

Assumptions

Throughout the following sections, the terms construction, operation and decommissioning have been used. These are defined as follows:

- **Construction** – Construction of the Proposed Development. Depending on the final plant selection, this is anticipated to take approximately three years starting 2021.

- **Operation** – REP is expected to start working and become fully operation in 2024. No specific timescale for operation of REP is proposed, the plant will be maintained to maximise its working life. During this time, there will also be maintenance activities and therefore “operation” also includes maintenance.

- **Decommissioning** – It is assumed for the purposes of this assessment that the REP generating equipment would be removed once the plant had ceased operations permanently. Any decommissioning phase is assumed to be of a similar or shorter duration to construction, and therefore environmental effects are considered to be of a similar level to those during the construction phase. It is assumed that the ducting for the Electrical Connection would remain in situ, but that the cables may be removed.

Where details of the Proposed Development are not fixed or known at this stage, a reasonable ‘worst case’ is assumed. This ensures the assessment is carried out on a conservative basis. The following assumptions have been made within the assessment:

- The height of the stack, from which emissions to the air are released during operation from the Energy Recovery Facility, will need to be agreed and finalised with the Environment Agency. For the purpose of the air quality assessment, the stack would be c. 90 m in height. For assessments considering the visual impact of the Proposed Development, a maximum height of up to 113 m Above Ordnance Datum (AOD) would be assumed.

- It is envisaged that the Energy Recovery Facility would likely have an anticipated throughput of approximately 655,000 tonnes of residual (non recyclable) waste per annum. However, for the Environmental Impact Assessment a ‘reasonable worst case’ maximum throughput of approximately 805,900 tonnes per annum has been added for robustness.

- The Anaerobic Digestion facility is assumed to have a throughput of up to 40,000 tonnes per annum.

- The Electrical Connection ducting will be left in place once the operations have permanently ceased. Cables may be removed or made safe and left in place.

- Standard control measures (embedded mitigation) will be used such as working within best practice guidance, and using measures which would routinely be incorporated in similar developments constructed in the UK.

- A reasonable worst case scenario has been assessed for each topic, as outlined within Chapters 6 – 14 of the Preliminary Environmental Information Report.
Assessing Effects

In line with feedback from the Secretary of State and stakeholders, the following topics are presented in the Preliminary Environmental Information Report and will be assessed as part of the Environmental Impact Assessment:

- Chapter 6 – Transport;
- Chapter 7 – Air Quality;
- Chapter 8 – Noise and Vibration;
- Chapter 9 – Townscape and Visual Impacts;
- Chapter 10 – Historic Environment;
- Chapter 11 – Terrestrial Biodiversity;
- Chapter 12 – Hydrology, Flood Risk and Water Resources;
- Chapter 13 – Ground Conditions;
- Chapter 14 – Socio Economics;
- Chapter 15 – Other Considerations;
- Chapter 16 – Summary of Preliminary Findings and In-Combination Effects; and
- Chapter 17 – Glossary.

A range of site surveys and data collection exercises have been used to identify environmental conditions within the relevant study areas.

If the Proposed Development is granted consent by the Secretary of State, it is anticipated that construction would commence in 2021. The assessment therefore uses a ‘2021 baseline’ to provide a future baseline against which the direct, indirect and cumulative effects of the Proposed Development can be assessed.

The Preliminary Environmental Information Report presents the preliminary findings of the assessment of likely significant environmental effects that could occur during the construction, operation and decommissioning phases. Until the detailed design for the Proposed Development has been completed, it is not possible to be definitive about the construction works and therefore the assessment has been based on available information and reasoned judgements drawn from similar projects to enable the likely significant environmental effects to be identified. In judging the significance of potential construction effects it has been assumed that the construction mitigation measures identified within the assessment are fully implemented. These measures would be secured via requirements attached to the Development Consent Order, should it be granted.

Each ‘topic assessment’ identifies receptors (e.g. people or an ecological site / habitat / species that might potentially be affected by a potential impact or impacts) to the Proposed Development. The assessment then considers the sensitivity of a receptor and the magnitude of effect on a receptor. The significance of the effect on the receptor is then determined. Further detail is provided in the methodology section for each environmental topic in the Preliminary Environmental Information Report.

Effects that are described as ‘substantial’, ‘major’ or ‘moderate’ are determined to be significant; and effects that are described as ‘minor’ or ‘negligible’ are determined to be not significant in the context of the Infrastructure EIA Regulations 2017.
The Infrastructure EIA Regulations 2017 also require an assessment of how the project will affect the environment in combination with the effects of other proposed projects in the area being constructed and/or operating at the same time (known as cumulative effects).

Other developments to be included within the cumulative assessment, have been identified using a tiered approach following advice notes from the Secretary of State. The preliminary findings are provided within the Preliminary Environmental Information Report. Once assessments for each topic have been completed the assessment of potential cumulative effects will be undertaken and results will be included in the Environmental Statement.

Chapter 4 of the Preliminary Environmental Information Report provides further information on the types (tiers) of cumulative development to be included.

The Environmental Statement will include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters.

### Table 1 Generic Significance Criteria

<table>
<thead>
<tr>
<th>SIGNIFICANCE LEVEL</th>
<th>CRITERIA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substantial</td>
<td>These effects are assigned this level of significance as they represent key factors in the decision-making process. These effects are generally, but not exclusively, associated with sites and features of national or regional importance. A change at a site or feature of district importance may also enter this category.</td>
</tr>
<tr>
<td>Major</td>
<td>These effects are likely to be important considerations at a local or district scale and may become key factors in the decision-making process.</td>
</tr>
<tr>
<td>Moderate</td>
<td>These effects, while important at a local scale, are not likely to be key decision-making issues.</td>
</tr>
<tr>
<td>Minor</td>
<td>These effects may be raised as local issues but are unlikely to be of importance in the decision-making process. Nevertheless, they are of relevance in enhancing the subsequent design of the project and consideration of mitigation or compensation measures.</td>
</tr>
<tr>
<td>Negligible</td>
<td>Either no effect or an effect which is beneath the level of perception, within normal bounds of variation or within the margin of forecasting error. Such effects should not be considered by the decision-maker.</td>
</tr>
</tbody>
</table>
4 **ASSESSMENT OF EFFECTS**

Table 2 below summarises the preliminary results of the assessments (from construction, decommissioning and operation of the Proposed Development) undertaken within the topic specific chapters of the Preliminary Environmental Information Report.

<table>
<thead>
<tr>
<th>TOPIC CHAPTERS OF THE PRELIMINARY ENVIRONMENTAL INFORMATION REPORT</th>
<th>SUMMARY OF PRELIMINARY RESIDUAL EFFECTS</th>
<th>CONSTRUCTION AND DECOMMISSIONING</th>
<th>OPERATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter 6 Transport</td>
<td>Effects to Public Rights of Way are considered to be <strong>Not Significant</strong>. Should lane closures be necessary, effects to highway links and highway junctions are considered to be <strong>Significant (Moderate Adverse)</strong>.</td>
<td>Effects to highway links, highway junctions and Public Rights of Way are considered to be <strong>Not Significant</strong>.</td>
<td></td>
</tr>
<tr>
<td>Chapter 7 Air Quality</td>
<td>Effects to human health, terrestrial biodiversity and from dust are considered to be <strong>Not Significant</strong>.</td>
<td>Effects from operational emissions to human health and terrestrial biodiversity are considered to be <strong>Not Significant</strong>.</td>
<td></td>
</tr>
<tr>
<td>Chapter 8 Noise and Vibration</td>
<td>Effects to the nearest noise sensitive receptors are considered to be <strong>Not Significant</strong>.</td>
<td>Effects to the nearest noise sensitive receptors are considered to be <strong>Not Significant</strong>.</td>
<td></td>
</tr>
<tr>
<td>Chapter 9 Townscape and Visual Impact Assessment</td>
<td>Based on reasonable worst case parameters and an outline design, effects to townscape character of the REP site and visual receivers within 1 km of the proposed stack are considered to be <strong>Significant (Moderate Adverse)</strong>.</td>
<td>Based on reasonable worst case parameters and an outline design, effects to townscape receptors (Crossness Conservation Area; the character and appearance of the REP Site; and on the landscape of Crossness Local Nature Reserve marshland, and scrubland habitats on the REP site), as well as visual receptors within 1 km of the proposed stack are considered to be <strong>Significant (Moderate Adverse)</strong>.</td>
<td></td>
</tr>
</tbody>
</table>
### TOPIC CHAPTERS OF THE PRELIMINARY ENVIRONMENTAL INFORMATION REPORT

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Topic</th>
<th>Summary of Preliminary Residual Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter 10</td>
<td>Historic Environment</td>
<td>Effects to heritage assets are considered to be <strong>Not Significant</strong>.</td>
</tr>
<tr>
<td>Chapter 11</td>
<td>Terrestrial Biodiversity</td>
<td>Effects to designated areas, habitats, wintering birds and other species are considered to be <strong>Not Significant</strong>.</td>
</tr>
<tr>
<td>Chapter 12</td>
<td>Hydrology, Flood Risk and Water Resources</td>
<td>Effects to water courses, ground water, Crossness Local Nature Reserve, the River Thames and existing infrastructure are considered to be <strong>Not Significant</strong>.</td>
</tr>
<tr>
<td>Chapter 13</td>
<td>Ground Conditions</td>
<td>Effects to human health, property, ground water, surface water and ecological systems are considered to be <strong>Not Significant</strong>.</td>
</tr>
<tr>
<td>Chapter 14</td>
<td>Socio-economics</td>
<td>Effects to the labour market are a considered to be beneficial but <strong>Not Significant</strong>. Effects to community infrastructure are considered to be <strong>Not Significant</strong>.</td>
</tr>
</tbody>
</table>

### Transport

REP would be accessed via the River Thames using Cory’s existing operational jetty to the north of the site. Pedestrians, cyclists, public transport users and vehicles can access the site via Norman Road. Norman Road provides a link to the highway network through a junction with Picardy Manorway. To the west the highway network connects to the A2016 and in turn to the South Circular, Woolwich Ferry and Blackwall Tunnel. To the east it connects to the A282, the M25 and the Dartford Crossing. The REP site is accessible using the Number 180 and 401 bus services and Belvedere railway station is within reasonable walking distance (c. 20-minute walk).

The potential effects on transport have been assessed and the preliminary findings are presented in the Preliminary Environmental Information Report. The potential effects of the construction, operation and de-commissioning of the Proposed Development have been assessed against the set criteria as set out in Chapter 6 of the Preliminary Environmental Information Report.

A number of receptors have been identified as likely to be affected by the transport impacts. While most receptors are susceptible to impacts by increased traffic flows from the Proposed Development, some, particularly the public rights of way, may be affected by potential disruption during the construction phase of the Electrical Connection route.
The assessment of preliminary effects from temporary construction traffic has identified that effects to most receptors would be Negligible and not significant, however temporary closures during installation of the Electrical Connection could result in (Moderate) significant adverse effects.

While the Applicant intends to receive the majority of waste throughputs via the existing jetty, the Preliminary Environmental Information Report considers two scenarios: 100% of waste arriving by river, and 100% by road. This approach ensures that the Preliminary Environmental Information Report presents a reasonable worst-case assessment which is considered conservative and robust.

The Preliminary Environmental Information Report chapter presents an assessment of preliminary traffic flow based on Department for Transport (DfT) traffic count database information. It should be noted that further traffic surveys have been undertaken, the data from which will be considered within a detailed Transport Assessment which will accompany the Environmental Statement.

The assessment has indicated that the preliminary effects generated by the operational Proposed Development (based on the reasonable worst case assumption of 100% of waste being delivered by road) are considered Negligible, and not significant. Mitigation measures such as the use of the river and encouraging the use of more sustainable transport, reduces this even further.

Discussions with relevant bodies, including Highways England, Transport for London, and local highways bodies including Kent County Council, Dartford Borough Council and London Borough of Bexley are ongoing. These discussions, and responses to the consultation on this Preliminary Environmental Information Report will inform a full Transport Assessment for the Proposed Development which will be submitted with the Development Consent Order application.

Air Quality

The air quality effects of the construction and operation of the Proposed Development have been assessed and the preliminary findings are presented in Chapter 7 of the Preliminary Environmental Information Report. The main effects associated with construction include the potential generation of dust which can be controlled by standard mitigation techniques such as avoiding the generation of dust in the first place and keeping surfaces damp. With these and other mitigation measures in place, the construction activities are not predicted to have any significant effects on the environment.

Whilst there will be additional traffic associated with the construction of the Proposed Development, the additional traffic volumes are unlikely to lead to significant air quality effects. The construction traffic levels are also less than the operational traffic levels which have been modelled in the assessment of operational effects (and which have been shown not to have a significant effect on the environment).

The potential for odour effects from the operational REP have been considered to be not significant. Waste would be delivered in sealed containers and the Energy Recovery Facility would operate under ‘negative pressure’ and control any outflow of air. No odour complaints have been received by Cory for RRRF since it became operational in 2011.

The main air quality effects from the operation of REP will be associated with emissions from the Energy Recovery Facility. Predicted emissions from the Energy Recovery Facility have been subject to a mathematical computer simulation of how air pollutants disperse in the atmosphere, assuming for this assessment that the buildings on site are the largest size (based on the reasonable worst case), and the emissions stack is the smallest that is envisaged to be necessary to disperse emissions. These assumptions will lead to worst case predictions of the maximum ground level pollutant concentrations from the Energy Recovery Facility.
Emissions from the separate combustion process are outlined below.

Modelling of emissions from the Energy Recovery Facility has predicted that industry assessment thresholds (above which significant effects could occur) would not be exceeded, and there will be no significant effects on human health. In addition, it is predicted that there will be no significant effects from the Energy Recovery Facility on ecological sites. The effects of emissions from the Energy Recovery Facility have also been considered in conjunction with, as part of the baseline, emissions from the RRRF and Crossness Sewage Sludge Incinerator, and no exceedances of relevant assessment levels have been predicted.

Modelling of emissions from the combustion of biogas and from the Anaerobic Digestion facility predict that associated effects are restricted to the immediate vicinity of the REP. There are unlikely to be any significant effects from the emissions from the Anaerobic Digestion facility.

Waste would be delivered to REP by river or road or a mix of both. An assessment is being undertaken of the potential effects of using either river or road options for the transport of anticipated waste volumes. The transport of waste is not predicted to give rise to significant effects on air quality.

**Noise and Vibration**

The potential effects from noise and vibration that may result from the construction, decommissioning and operation of the Proposed Development have been assessed and are presented in Chapter 8 of the Preliminary Environmental Information Report.

The nearest noise sensitive receptors have been identified, and agreed with the Local Environmental Health Officer, and include residential properties to the south of the Proposed Development such as Hackney House apartments, Jutland House apartments and dwellings along St. Thomas Road.

An assessment of the noise and vibration effects associated with the construction and decommissioning of REP has been undertaken assuming that all construction activities would occur simultaneously, providing a conservative assessment. The assessment has concluded that effects at the closest dwellings are **Negligible** and not significant, owing to embedded mitigation measures and distance (minimum of c. 750 m) from noise generating activities.

Similarly, effects from the construction of the Electrical Connection are considered to be **Negligible** and not significant due to mitigation measures which would be applied.

The assessment of operational noise from REP (taking into account the existing noise conditions around REP through survey work agreed with the local Environmental Health Officer), is based on noise generated from plant operating at maximum levels and continuously over a 24 hour period. In addition, as outlined in the transport section above, this assessment uses a scenario where 100% of waste is delivered to REP by road. This is considered to provide a conservative assessment.

The preliminary noise effects from the operation of REP, based on computer modelling, have been calculated to be below the background noise levels at the nearest sensitive receptors for both the daytime and night-time. The effect is therefore considered to be **Negligible** and not significant.

A second operational scenario will be assessed for effects to sensitive receptors, where 100% of waste is transported by river. This assessment will be presented in full in the Environmental Statement.
Townscape and Visual Impact Assessment

The effects from the Proposed Development on townscape (including townscape character) and people’s views and visual amenity have been assessed and are presented within Chapter 9 of the Preliminary Environmental Report. Effects could occur from construction activities (e.g. ground clearance, use of any large cranes and mobile construction plant), decommissioning (e.g. any potential dismantling structures, restoring land), as well as during operation (e.g. the stack, the proposed buildings and temporary construction compounds).

The area surrounding the Proposed Development has a history of industrial and marine engineering as well as transport infrastructure. This is evident from the mixed age of buildings in the area, e.g. the Crossness Conservation Area contains public health engineering structures from the Victoria period. There are also modern commercial and industrial buildings together with the sewage treatment plant nearby.

The areas immediately surrounding the REP site, on both the northern and southern banks of the River Thames, mainly comprise established industrial areas with relatively tall structures, including wind turbines on the northern side of the River Thames, as well as large shed-like buildings and tall stacks in the area.

The surrounding land is generally flat and open alongside the River Thames corridor, with the long distance Thames Path and National Cycle Route 1 following the river’s edge.

Potential visual receptors include users of Public Rights of Way, cycle routes, open spaces and parks. Further visual receptors include people using the River Thames, road and rail network and people visiting, living or working within the study area.

The preliminary findings of the assessment are based on professional experience, experience from similar projects as well as accepted industry guidance. The assessment assumes for this topic that the Proposed Development would have a maximum stack height of 113 m AOD, and the maximum building height would be 65 m AOD, which provide the basis for assessing worst case.

The assessment shows that the construction of the Energy Park could give rise to temporary (Moderate) significant effects on views within a 1 km buffer from the stack, and on the townscape character of the REP site.

During operation there is the potential that the Proposed Development could result in (Moderate) significant effects to views within 1 km of the stack, as well as significant townscape effects on Crossness Conservation Area; the Character, and Appearance of the Site; and on the Crossness Local Nature Reserve marshland adjacent to the Energy Park as well as scrubland habitats on the REP site itself.

There is the potential for operational effects to be reduced through detailed design of the Main REP Building, which will be considered at a later stage and set out within the Environmental Statement and Design and Access Statement, which will be submitted as part of the application for the Development Consent Order.
Historic Environment

The effects from the construction, decommissioning and operation of the Proposed Development on surrounding archaeology and cultural heritage have been assessed, including the potential effects on below ground archaeological remains, geoarchaeological deposits (archaeological soils and sediments) at the REP site and on the settings of designated heritage assets (such as listed buildings).

There are several designated and built heritage assets in the vicinity of the REP site including: the Crossness Conservation Area, the Grade I listed Crossness Pumping Station, two Grade II listed workshops at Crossness Pumping Station, a locally listed engine house at Crossness Sewage Treatment Work, the Grade II listed jetty at Dagenham Docks and the scheduled and grade II listed Lesnes Abbey, approximately 1.5 km south-west of the study site.

The preliminary findings of the assessment are presented in Chapter 10 of the Preliminary Environmental Information Report and the assessment is undertaken in accordance with relevant and up to date industry guidance, which identify good practice in the assessment process.

The assessment of the construction and decommissioning phases of the Proposed Development considers the potential for the removal of non-designated heritage assets of local significance, and assumes a depth of c. 900 mm for the Electrical Connection trench except where there is a potential for some localised areas of deeper excavation as required. The potential effect of the Proposed Development during construction and decommissioning on the historic environment is considered to be Negligible and not significant.

The assessment of operational effects from the Energy Park assume the same heights for the built form of the Proposed Development as outlined for the Townscape and Visual Impact assessment, providing the basis for assessing worst-case.

Taking this maximum stack height into account, the Proposed Development, when operational, is considered to result in Negligible and not significant effects.

Terrestrial Biodiversity

The Proposed Development has the potential to affect terrestrial biodiversity receptors during either site clearance, construction, and/or operation from: habitat loss; disturbance (including through shading); noise and/or visual disturbance; dust; surface water drainage; lighting; and effects as a result of emissions from the stack being deposited on biodiversity receptors.

Epping Forest Special Area of Conservation (SAC) is within 15 km of the proposed stack location. 37 national statutory designated sites were identified within 15 km of the REP site, however only those designated for their biological interest are included in this assessment.

Three Local Nature Reserves (LNR), 38 Sites of Importance for Nature Conservation (SINCs), two Local Wildlife Sites (LWS) and one Roadside Nature Reserve (RsNR) have been identified.

The habitats potentially affected by the Proposed Development are characterised by artificial habitats including bare ground, areas of tarmac and hard-standing. However, semi-natural and created habitats are also present within the REP site and nearby River Thames and coastal grazing marsh (within Crossness Local Nature Reserve immediately adjacent to the REP site). These habitats have the potential to support protected or otherwise notable species.
Surveys for the following species have been, or are being carried out: breeding and wintering birds, terrestrial invertebrates, reptiles and water voles. As baseline surveys for these species are seasonally dependent, they are currently ongoing and will be fully reported in the Environmental Statement.

There is the potential for ecological effects to arise from other technical assessments, for example, changes in air quality, noise or hydrology as a result of the Proposed Development which are also taken into consideration.

However, the preliminary findings of the assessment (as set out in Chapter 11 of the Preliminary Environmental Information Report) have identified that effects currently anticipated to occur to terrestrial biodiversity as a result of the Proposed Development would be Negligible and not significant.

Studies are on-going to quantify the potential habitat losses and gains as a result of the Proposed Development. This will determine whether additional measures are required away from the REP site to result in an overall gain in biodiversity in accordance with local and national policy.

Hydrology, Flood Risk and Water Resources

An assessment of likely effects upon hydrology, flood risk and water resources, from the construction operation and decommissioning phases of the Proposed Development has been undertaken and the preliminary findings are presented in Chapter 12 of the Preliminary Environmental Information Report.

The REP site is located on the south bank of the River Thames and falls within Flood Zone 3 (high probability of flooding). However, the REP site falls within an area that benefits from flood defences designed to protect a flood event with a probability of occurring once every 1,000 years.

Crossness Local Nature Reserve is located immediately to the south of the REP site and has a number of surface water features, including the Great Breach Dyke, which receives surface water run-off from the Abbey Wood area to the south and ultimately outfalls to the River Thames.

The Electrical Connection route extends to the south-east of the REP site and crosses over the River Cray and the River Darent a short distance to the west of the connection point at Littlebrook substation. The Electrical Connection route also benefits from the same level of flood protection as above.

Potential effects during the construction phase include changes to the surface water drainage network and the contamination of both surface water and groundwater, including increased volumes of silt in watercourses.

In addition, works in close proximity to the River Thames tidal flood defences have the potential to affect the stability of the defence embankment and therefore the structural integrity of the defences.

Potential effects during the operational phase include increased surface water run-off (due to a decrease in land area with the ability to absorb water naturally), and increased flood risk in the vicinity and downstream of the REP site. There is also the potential for the contamination of surface water entering the Great Breach Dyke and associated watercourses as a result of silts and chemicals being washed off areas of hardstanding within the REP site. The assessment notes that during the operational phase, the Electrical Connection, comprising a buried cable, will not give rise to effects upon hydrology, flood risk and water resources.

Based upon this assessment of likely effects upon hydrology, flood risk and water resources, it is concluded that effects from both construction and decommissioning, and operation would be localised, temporary and Negligible which would not be significant.

A Flood Risk Assessment and Water Framework Directive Compliance assessment will be prepared and submitted as part of the Environmental Statement.
Ground Conditions

An assessment of likely effects upon ground conditions from the construction, operation and decommissioning phases of the Proposed Development has been undertaken. Current land uses include structures and buildings associated with the existing RRRF, wetland and wasteland habitat, storage and car parking.

The assessment has involved a study of available desk-based information on land within and surrounding the Proposed Development, as well as a review of environmental datasets, responses made by regulatory authorities (Environment Agency and local Environmental Health Officer) to enquiries and a walkover survey.

Historically the site was developed with various historical industrial uses including a manure works, a borax processing works and a Fish Guano Works.

Additionally, the wider historical and current land uses have included large scale industry (e.g. an oil-fired power station, timber treatment yard, agrochemicals works, borax waste storage area) which potentially have impacted the surrounding water quality.

Available geological literature indicates that the anticipated sub-surface layers underneath the REP site are likely to be ‘Alluvium’ over ‘River Terrace Deposits’ and ‘London Clay’. However, a review of historical ground investigation reports indicates that the natural sub-surface layers are likely to be overlaid by made ground (not natural) of varying thickness.

A desk-based assessment of ground conditions has been undertaken to identify the potential effects of the Proposed Development on human health and the environment in relation to ground contamination and hazardous ground gases. A preliminary site investigation using boreholes is being undertaken to provide further information to inform the on-going assessment work.

The REP site is underlain with shallow granular alluvium and adjacent to the River Thames.

A number of potential ground instability conditions have been identified which are associated with the natural geology, and relate to the potential presence of historical in ground obstructions, variable consistency of made ground and compressible clays and peat.

The following potential contaminants have been identified at the REP site and temporary construction areas:

- Hydrocarbons (TPH and PAH);
- Asbestos;
- Ground gases (methane, carbon dioxide, depleted oxygen levels); and
- Boron.

The receptors identified within this assessment include human health, surface water, ground water, property and ecological systems (further explanation of these receptors is available in Chapter 13 of the Preliminary Environmental Information Report).

Through the adoption of mitigation measures (for example; the wearing of appropriate personal protective equipment, hygiene and systems of work for construction workers) the effects of both the construction and operation of the Proposed Development are assessed to be either Negligible or Minor Beneficial, neither of which are significant. No further mitigation has therefore been identified as being required.
Socio-Economics

An assessment is presented in Chapter 14 of the Preliminary Environmental Information Report which identifies preliminary potential effects associated with the construction, operation and decommissioning of the Proposed Development upon the labour market and community infrastructure.

The study area for the assessment is based on a 60-minute drive time catchment from the REP site. This is considered to reflect the upper limit that individuals would typically commute on a daily basis. The assessment follows UK Government guidelines and best practice guidance.

The socio-economic profile of the study area identifies the area as having a readily available skilled labour, increasing population, above average economic activity and high educational attainment. The community infrastructure baseline identifies a number of facilities in proximity to the Proposed Development.

The assessment of likely effects identifies that the increase in construction jobs arising from the Proposed Development, as well as the increase in operational jobs required, has beneficial effects on the labour market. Whilst these effects are considered (Minor) Beneficial, they are not considered to be significant in Environmental Impact Assessment terms.

In terms of community infrastructure, it is concluded that effects associated with both construction and decommissioning activities would be Minor and not significant. Similarly, effects arising from the operational phase would be Minor and not significant.

The Proposed Development would have Minor Beneficial (not significant) effects on the socio-economic status of the area though both employment creation and capital expenditure and worker spending in the local economy.

During operation, there would be the equivalent of approximately 75 permanent jobs created. This is anticipated to bring Minor Beneficial (not significant) effects to the area in the vicinity of the REP site through the generation of jobs, supply chain linkages and employee spending. REP operation would provide approximately £16.8m and £24.9m per annum to the local and national economy respectively.

Other Considerations

The Proposed Development may give rise to other environmental effects over and above those described above, including Climate, Lighting, Human Health and Waste, for which specific assessments were not required as agreed through the Scoping Opinion provided by the Secretary of State.

Climate will be considered within topic chapters where relevant. However, it is envisaged that a qualitative assessment of greenhouse gas emissions will be submitted with the Development Consent Order application.

Lighting will be required both temporarily during the construction phase and permanently during the operational phase of the Energy Park. Consideration of lighting effects on ecological receptors will be considered in the relevant assessments above, and a Lighting Statement will be submitted as part of the application. This will set out the principles for the operational lighting design for the REP site.

Human Health is considered through a Health Impact Assessment which is an Appendix to Chapter 15 of the Preliminary Environmental Information Report. This, along with the Air Quality assessment, assesses the effects of the Proposed Development on Human Health. The preliminary assessment has not identified any significant negative effects to Human Health, and identified that there may be a significant long term positive effect on health outcomes associated with security of energy supply and the potential for connecting to a local district heating network.
In-Combination Effects

Individual environmental effects from the same project combining to result in a different/more significant effect on the same receptor can occur, these are referred to as in-combination effects. For example, an individual receptor (i.e. an ecological species) could be affected by noise impacts from the operation of REP as well as impacts to air quality from operational emissions.

The Preliminary Environmental Information Report has summarised (in Chapter 16) that there is the potential for in-combination effects to human, heritage, biodiversity, water body and community infrastructure receptors.

This assessment will be presented in the Environmental Statement, and will ensure that the combination of effects across environmental disciplines will be considered.

Cumulative Effects

The Preliminary Environmental Information Report has provided a ‘long list’ of other development which will be taken into consideration for the assessment of cumulative effects. This list will be refined and agreed for assessments within the Environmental Statement.

Significant adverse cumulative effects are not considered to be likely at this stage, however the cumulative assessment will be presented within the Environmental Statement.
5 ALTERNATIVES CONSIDERED

Suitability of the REP site

The REP site is considered highly suitable for the Proposed Development. Based on the following advantages, alternative sites were not considered:

- REP’s proven and deliverable riverside location in London and access to the Applicant’s River Thames network beyond;
- Use of the existing operational jetty and road access;
- Location within an existing urbanised/industrialised environment;
- Adequate footprint within the REP site for the development;
- Ability to connect to the local electricity distribution network;
- Located at what is considered to be an appropriate distance from existing residential receptors;
- Lack of conflict with statutory environmental designations (noting that although the REP site falls within a flood zone, it does however benefit from flood defences);
- Benefits from proximity to potential district heat network users; and
- The REP site is previously developed land.

Alternative Layouts

Alternative layouts of the Proposed Development were considered. Consideration was given to the requirements of the proposed energy generation technology, the space available within the REP site, and the requirement to ensure the adjacent RRRF remained fully operational.

Four layouts were considered, two on a north to south orientation and two on an east to west orientation (see Chapter 4 of the Preliminary Environmental Information Report for further details).

It was identified that a north to south orientation opened views to and from the River Thames, and would enable efficient operations within the site.

It was further identified that orientating the Proposed Development such that the stack (and thus the narrower end of the Main REP Building) was located at the northern end would allow more opportunity for landscaping and would maximise the opportunity for Solar Photovoltaic Installations.

Use of the Marine Environment

During early stages of the project design process, it was considered whether temporary works within the River Thames (temporary causeway or temporary cranes) may be required to enable construction of the Proposed Development.

As the project design evolved it was recognised that no intrusive works in the marine environment were required. Only the existing jetty and mooring points would be utilised. This prevents the need to install a temporary causeway; lift components over a public footpath and flood defence wall; or the need for any localised dredging.
**Electrical Connection route**

Two options for connecting REP to the electricity distribution network were initially considered, routing to either Renwick Road, Barking (north west of the REP site, through an existing utility tunnel under the River Thames) or to the Littlebrook substation in Dartford (south east of the REP site).

Through working with UK Power Networks (UKPN), the Barking connection option was discounted due to insufficient space within an existing utility tunnel under the River Thames, therefore the Littlebrook connection was progressed.

Further consideration by UKPN has identified alternative routing options for connecting to the Littlebrook substation. A final decision on the connection route will be undertaken with UKPN and taking into account feedback from the consultation process. For the purpose of the assessments presented in the Preliminary Environmental Information Report, all route options to Littlebrook at Dartford have been considered.

**Alternative Laydown Areas**

There is insufficient space within the REP site to accommodate all temporary laydown, fabrication, welfare and parking provision that is required during the construction phase. A desk top exercise was undertaken to identify other sites which would be suitable to use.

Search criteria including overall area, distance from the REP site, distance to the A2016, and avoiding areas of high density housing. This identified nine sites, three of which were considered advantageous over the others (see Chapter 5 of the Preliminary Environmental Information Report for further information). Due to proximity to the REP site and existing relationship with landowners, the land west of Norman Road was progressed.

Further information regarding the alternatives outlined above is available in Chapter 5 of the Preliminary Environmental Information Report.
6  FURTHER INFORMATION AND NEXT STEPS

Consultees are invited to provide feedback and comments on the proposals and the preliminary findings during the consultation period which runs from 18th June 2018 to 30th July 2018 (inclusive).

Copies of the Preliminary Environmental Information Report, this Non-Technical Summary and the Figures may be examined during the statutory consultation period at the locations outlined in Table 3 below:

Table 3 Inspection venues for consultation documents

<table>
<thead>
<tr>
<th>VENUE NAME AND ADDRESS</th>
<th>OPENING TIMES</th>
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<tbody>
<tr>
<td><strong>Upper Belvedere Community Library,</strong></td>
<td></td>
</tr>
<tr>
<td>Woolwich Road</td>
<td>Monday 09.30-13.00</td>
</tr>
<tr>
<td>Upper Belvedere</td>
<td>Tuesday 09.30-17.30</td>
</tr>
<tr>
<td>DA17 5EQ</td>
<td>Wednesday 13.45-17.30</td>
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<tr>
<td></td>
<td>Thursday CLOSED</td>
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<tr>
<td></td>
<td>Friday 09.30-17.30</td>
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<tr>
<td></td>
<td>Saturday 09.30-14.30</td>
</tr>
<tr>
<td></td>
<td>Sunday CLOSED</td>
</tr>
<tr>
<td><strong>London Borough of Bexley Civic Offices,</strong></td>
<td></td>
</tr>
<tr>
<td>2 Watling Street</td>
<td>Monday 09.00-17.00</td>
</tr>
<tr>
<td>Bexleyheath</td>
<td>Tuesday 09.00-17.00</td>
</tr>
<tr>
<td>Kent</td>
<td>Wednesday 09.00-17.00</td>
</tr>
<tr>
<td>DA6 7AT</td>
<td>Thursday 09.00-17.00</td>
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<td></td>
<td>Friday 09.00-17.00</td>
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<td></td>
<td>Saturday CLOSED</td>
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<td></td>
<td>Sunday CLOSED</td>
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<tr>
<td><strong>Dartford Library,</strong></td>
<td></td>
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<tr>
<td>Central Park</td>
<td>Monday 08.30-18.00</td>
</tr>
<tr>
<td>Market Street</td>
<td>Tuesday 08.30-18.00</td>
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<tr>
<td>Dartford</td>
<td>Wednesday 08.30-18.00</td>
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<tr>
<td>Kent</td>
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<tr>
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<td>Friday 08.30-18.00</td>
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<td></td>
<td>Saturday 09.00-17.00</td>
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<td></td>
<td>Sunday CLOSED</td>
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</table>

The opening times provided in Table 3 are indicative and subject to the venue’s operating procedures.

The technical appendices to the Preliminary Environmental Information Report will only be available electronically at the council offices and libraries.

All consultation documents are available on the REP website: [www.riversideenergypark.com](http://www.riversideenergypark.com)

Consultation responses should be submitted to Cory by **17.00 on 30th July 2018**. Questions and comments on this document, the REP proposals and consultation responses can be submitted to Cory using the details below:

**Email:** info@riversideenergypark.com

**Mail:** FREEPOST RIVERSIDE ENERGY PARK

**Phone:** 0330 838 4254
7 FIGURES

Figure 1 Site Location Plan
Figure 2 Indicative Application Boundary