Civic Offices, New Road, Grays
Essex RM17 6SL

Planning & Growth

Thurrock Council

Written Representation

March 2021

Thurrock Power Ltd - Proposed Flexible Electricity Generation Plant

Planning Inspectorate Reference: EN010092

Contents

1.0 INTRODUCTION

1.1 This document sets out Thurrock Council's (TC) Written Representations (WR) on the application for a Development Consent Order (DCO) made by the Thurrock Power Ltd for the construction and operation of a flexible electricity generation plant on land directly to the north of the former Tilbury Power Station site within the Green Belt.

1.2 Thurrock Council is a unitary authority and therefore performs functions as the local planning authority, local highways authority, waste planning authority and local lead flood authority. The area which is the subject of the application for the DCO lies wholly within the administrative area of TC.

1.3 The content and conclusions of this WR were presented to and agreed at the meeting of the Council's Planning Committee on 11 February 2021, with any relevant revisions after this time being agreed by the Assistant Director of Planning, Transport and Public Health. TC submitted a Relevant Representation (RR) in August 2020 which contained a summary of what is considered to be the main issues raised by the proposals. This RR representation also provided a position statement in the form of technical comments from relevant Council officers.

1.4 TC has prepared a Local Impact Report (LIR) which was also presented to the TC Planning Committee at its meeting on 11 February 2021. The LIR is a detailed 'technical' report which considers the range of social, environmental and economic impacts raised by the proposals and considers the positive, neutral or negative local impacts. TC has also engaged with the applicant to progress a draft Statement of Common Ground (SOCG) in order to confirm which matters relevant to TC are agreed, which matters are still under discussion and whether matters are not agreed between TC and the applicant.

1.5 In line with the guidance at paragraph 23.1 of the Planning Inspectorate (PINS) Advice Note 2 (The Role of Local Authorities in the Development Consent Process), this WR sets out the view of the local authority on whether or not it supports the application and its reasons for forming this view. This WR therefore balances and weighs the content of the applicant's submission, the LIR and the associated technical considerations to reach a TC 'summary position'. It is to be expected that the proposals, due to their significance and complexity, will result in a range of positive, neutral and negative local impacts. The primary purpose of this WR is therefore to balance the potential local impacts in order to set out TCs view on the application with associated reasons.

1.6 As suggested by paragraph 23.2 of Advice Note 2, this WR is intended to be a concise document, relying on cross-referencing to the LIR and draft SOCG in order to avoid unnecessary repetition.

1.7 TC appreciates that once submitted to PINS this WR cannot be withdrawn. Although TC reserves the right to provide further representations during the examination of the proposals if TCs view or policy position alters.

2.0 SUMMARY OF ECONOMIC, SOCIAL AND ENVIRONMENTAL IMPACTS

2.1 The Economic, Social and Environmental Impacts of the development the following table has been produced in the LIR:

Economic	• The need for electricity demand, security and network resilience along with the locational factors for choosing this site • Job creation for the construction/future decommissioning and operational phases with a range of jobs involved. Jobs would include direct and indirect jobs for the construction/future decommissioning. Opportunity for specialist technical jobs for the operational phase. • Construction Phase could use local labour sources and local materials that would benefit the local economy for Thurrock.
Social	• Job creation and social benefits for employees • Access to exchanged Common Land and access to new ecology and nature conservation areas could provide leisure, recreation and educational benefits
Environment	• Impact upon the Green Belt • Landscape and Visual Impact • Impact upon Heritage Assets but more information required • Impact upon Flood Risk and Surface Water Drainage but more information is required • Ecology and Nature Conservation – loss of habitat and the need to translocate protected species but recognise the proposal would provide new ecology areas for habitats, net biodiversity gain and access improvements • Impacts on Ground Conditions, Air Quality, Noise and Vibration can be mitigated for environmental reasons and for human health reasons • Some loss of agricultural land • Use of a fossil fuel for electricity production would contribute to climate change

3.0 SUMMARY OF RELEVANT TOPICS

3.1 The table below provides a conclusion as summary of the local impacts based on the analysis of the material considerations.

Material Consideration	Local Impact	Summary of the Impact and any Mitigation
Principle of the Development and the Impact upon Green Belt;	Positive & Negative	Positive as the proposal would meet critical need for electricity demand, security and network resilience along with the locational factors for choosing this site. Negative impact upon the Green Belt as proposal would be 'inappropriate development' and would impact upon the openness of the Green Belt. However, factors put forward demonstrate Very Special Circumstances exist that would outweigh the harm.
Ecology and Nature Conservation;	Positive & Negative	The proposal would result in the loss of habitat and would impact upon protected species at the site, however, it is recognised that the areas to the north and south of the railway line would form new habitats to allow for translocation, net gain, along with improvements for accessing these areas, when compared to the difficult access arrangements to Walton Common, so there would be improvements to Green Infrastructure in the area.
Landscape and Visual Impact;	Negative	The proposal would lead to adverse landscape and visual impacts and consideration is needed for mitigation through careful design in regard to the proposal's impact upon the surrounding landscape and visual receptors.
Heritage Assets;	Negative	Precautionary approach as Negative until more information is proposed as follows: For archaeology further information is required because at present the submitted documents do not provide an appropriate understanding of the potential impact on the below ground archaeological deposits, their extent or significance. For heritage assets further information is required to address inconsistencies within the Historic Environment Desk Based Assessment (ES Vol 6:

		Appendix 7.1), and there is a need to assess the grade I listed church of St Katherine, grade II listed Old Rectory and the grade II* Church of St James in the ES.
Flood Risk and Hydrology;	Neutral	In terms of flood risk the impact can be minimised through the submission of information through the 'requirements' to mitigate the impact of the development. The Council's Flood Risk Advisor needs a strategy and design for the surface water drainage at the site and this can be secured through the 'requirements', although revisions are required to the relevant surface water drainage 'requirement' (requirement 10).
Geology, Hydrogeology and Ground Conditions;	Neutral	The overall findings of the ES and the views of the Council's Environmental Health Officer for Contaminated Land identify that there are no objections raised to this consideration.
Traffic and Transport;	Neutral	The proposal's impact of the access arrangements and construction route raises no objection, and in terms of traffic impact would raise no conflict with policy. Through the 'requirements' it is recognised that the 'Construction Worker Travel Plan' would be provided to promote sustainable transport.
Air Quality;	Neutral	Subject to mitigation measures being implemented the proposal would not lead to any significant adverse effects upon air quality.
Noise and Vibration;	Neutral	Subject to mitigation measures being implemented the proposal would not lead to any significant adverse effects on receptors sensitive to noise and vibration.
Land Use and Agriculture, and Socio-Economics;	Positive & Negative	Employment creation for the construction and operational periods and improved Common Land areas that are more accessible. The only negative is some loss of agricultural land.
Human Health;	Neutral	Taking into consideration air quality, noise, traffic and the socio-economic benefits the proposal would not lead to any significant adverse effects on human health.

Climate Change;	Negative	The proposal would contribution to climate change using gas for electricity production, however, this is a flexible generating plant so it is recognised that this would not be used all the time. The battery storage would help store electricity and release to the grid when needed.

4.0 SUMMARY OF REPRESENTATIONS AND OVERALL CONCLUSIONS

4.1 The above summary of the positive, neutral and negative impacts of the proposal, along with the social, economic and environmental impacts has informed the TC overall conclusion to this application.

4.2 A full discussion of relevant Development Plan policies is set out in part 6 of the LIR. Furthermore, TC is aware that the National Policy Statements for Energy (EN1, EN2 and EN4) identify the need and urgency for new energy infrastructure to be consented and built with the objective of contributing to a secure, diverse and affordable energy supply, and supporting the Government's policies on sustainable development, in particular by mitigating and adapting to climate change. This includes consideration of specific technologies, including gas supply and storage infrastructure to help meet energy demand.

4.3 The LIR identifies the proposal would result in a 'negative impact' upon the landscape and visual receptors and the LIR through the relevant consultation responses identifies the need for further information to fully assess the impact upon heritage assets. There would be a 'negative impact' through the loss of ecological habitat and through the impact upon climate change.

4.4 Subject to the proposed mitigation measures identified in the application, it is considered within the LIR that a 'neutral impact' would be applicable for flood risk and hydrology; geology, hydrogeology and ground conditions; traffic and transport; air quality; noise and vibration; human health; and climate change.

4.5 The proposal as explained in the LIR would result a 'positive impact' through biodiversity net gain in ecological and conservation and benefits within the site for leisure, recreation and educational benefits, along with improvements for accessing replacement Common Land and associated green infrastructure improvements. The socio-economic benefits would result in employment creation mainly for the construction period but there would also some employment opportunities for the operational period, either direct or indirect.

4.6 On balance, after considering the content of the application and supporting documentation, the consideration of national and local planning policy and feedback from various technical consultees, it is considered that TC should support in principle the application for the construction and operation of a flexible electricity generation plant.

4.7 In reaching this view, a thorough assessment of the principle of the development within the Green Belt has been considered in the LIR identifying that the proposal would result in a 'negative impact' as harm through inappropriate development and the impact upon the openness of the Green Belt in this location, however, this is considered to be outweighed by the factors put forward as Very Special

Circumstances by the applicant including the critical need for electricity demand, security and network resilience along with the specific locational factors for choosing this site with its connections to the National Grid in the form of the Tilbury Substation and associated pylons, and the nearby connection to the national transmission gas system.