



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed London Strategic Heat Main

Case Reference: EN0710009

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

12 August 2026

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APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

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1. INTRODUCTION

- 1.0.1 On 03 July 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Cory Environmental Holdings Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed London Strategic Heat Main (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0710009/documents>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has/has not agreed to scope out certain aspects/ matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant statutory bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.0.1	Figure 1-1	Scoping Boundary	The applicant should consider whether the figure could show the proposed development order limits within the scoping boundary, this would enable an understanding of the relationship between the proposed development and the scoping boundary. The scoping boundary should also clearly set out where this encroaches into the river Thames itself.
2.0.2	N/A	Figure using satellite underlay	Due to the location of the proposed development, the applicant is requested to consider the inclusion of a plan showing the order limits, with a satellite underlay, to show the interaction between the proposed development and the current baseline built and natural environment.
2.0.3	Para 1.3.5	Interactions with the proposed Thames Mobile Heat Project	The Scoping Report refers to the proposed development as a standalone project however; the ES should detail whether there are any aspects of the proposed development that are to be constructed to facilitate heat transfer to the Thames Mobile Heat Project, or any interactions between the two projects.
2.0.4	Para 2.2.1	Potential to provide cooling	The Scoping Report refers to the potential ability for the proposed development to provide cooling as well as heating, however no further information is provided on this. If the ability to provide cooling is included within the draft Development Consent Order (dDCO), the ES should provide a full description of this including a technical description, parameters of any equipment required, and an assessment of relevant effects.
2.0.5	Para 2.2.5	Addition of further heat sources during operation	The Scoping Report states that there is the potential for other heat sources to be connected to the proposed development. The ES should detail any known interactions with these heat sources or works required to connect to them, and insofar as it has the potential

ID	Ref	Description	Inspectorate's comments
			to result in significant effects. The ES should also explain, how, should these additional inputs be utilised, whether this would alter the required input from the Riverside campus.
2.0.6	Para 2.2.6	Provision of landscaping	The Scoping Report states that the proposed development would be supported by landscaping, however the same paragraph (at bullet point f) states that the proposed development would include “any required landscaping”. The Inspectorate considers that it is unclear whether the landscaping proposed is only on a like for like basis of reinstatement or is proposed for mitigation or further enhancement. The ES should provide a full description of the landscaping proposed and its purpose to ensure robust assessments and a clear understanding of the proposed development.
2.0.7	Para 2.3.2	Terminology of built form	The Scoping Report states that buildings within the order limits are represented by red hatching on an accompanying figure. However, the description on the figure describes “built form”, which could be considered to be any type of built infrastructure. The ES should ensure to use clear terminology when describing existing site conditions.
2.0.8	Para 2.3.2	Interactions with existing buildings	The Scoping Report states that “physical works will not, as far as practicable, interface with buildings”. However, several technical chapters indicate that the effects on buildings are unlikely as the pipeline depth is sufficiently below foundation depth. The ES should ensure to clearly state whether impacts to buildings are scoped into each relevant aspect chapter. The ES should also state why these selected buildings are required to be within the boundary of the proposed development, as it is noted that the majority of the route of the trunk main and transmission branches avoid buildings.
2.0.9	Para 2.5.1	Source of water within the pipeline	The Scoping Report states that the heat main will utilise pressurised hot water. The ES should clarify the source of this water i.e. whether it is abstracted or potable water, or whether the proposed development would utilise water that is used for any cooling processes at the Riverside campus. Whilst the Inspectorate notes that a closed loop system is proposed to be used, the ES should also confirm if there is any further requirement for water use during operation, for

ID	Ref	Description	Inspectorate's comments
			example topping up the system after any loss/ offtake or refilling after maintenance and state the source of this water.
2.0.10	Para 2.5.18	Description of works at the Riverside Campus	The Scoping Report provides a limited description of the proposed works at the existing Riverside campus to enable connection. The ES should provide a full description of all works and provide an assessment of the relevant effects of these works, and provide clarity on whether these are included in the dDCO or an alternative permission.
2.0.11	Para 2.5.21	Additional tunnelling for electricity connection	The Scoping Report refers to additional works potentially being required including tunnelling to achieve utilities connections. The ES should clarify whether these are within the boundary and scope of the proposed development and assess the relevant effects of these.
2.0.12	Para 19.7.8e	Pipejacking during the operation phase	The Scoping Report lists pipejacking as a measure to reduce risks during pipeline installation, however this is noted as an activity under the operational phase. Throughout the Scoping Report, operational effects are frequently scoped out as limited maintenance work and no additional construction is proposed. The ES should clearly state whether any additional pipelaying is required during the operational phase and assess the relevant effects. It should be noted that the Inspectorate, when agreeing to scope matters out in this scoping opinion, has assumed no pipejacking as operational activities are listed as minor and confined to the Maintenance and Access points (MAPS).
2.0.13	N/A	Scour Protection	The ES should set out whether scour protection is required for any of the river crossings and should it be required, quantities should be provided and effects assessed.

2.1 EIA Methodology and Scope of Assessment

(Scoping Report Sections 3, 4 and 5)

ID	Ref	Description	Inspectorate's comments
2.1.1	N/A	Surveys	The ES should provide detailed information regarding the methodology, scope and results of survey work undertaken. If possible, this should be agreed with relevant statutory bodies. Any limitations regarding the scope of the surveys, such as being unable to access land, should be sufficiently explained and justified.
2.1.2	N/A	Decommissioning phase	The Scoping Report proposes to scope out an assessment of the decommissioning phase, as decommissioning is not currently proposed. In the event that the proposed development is decommissioned, the Scoping Report states that this would result in a limited scale of works to remove above ground infrastructure and underground pipelines are expected to be left in-situ to minimise adverse environmental effects. On this basis, the Inspectorate agrees that the decommissioning phase can be scoped out of further assessment. However, the appellant should consider a commitment to a decommissioning plan to ensure good practice measures and mitigation are secured to ensure no significant effects.
2.1.3	N/A	Consistency of baseline data within figures	There are some minor discrepancies between figures which are intended to represent the same information, for example differences between the listed buildings shown in the Crossness Conservation Area between Figure 2-2 sheet 1 and Figure 10-1 sheet 3. The ES should ensure that figures provide a consistent representation of the baseline or assessment findings.
2.1.4	N/A	Riverbed depths	The Port of London Authority (PLA) has requested that the ES sets out current and future riverbed depths (see appendix 2 of this Opinion). The applicant is encouraged to agree with the PLA and other relevant statutory bodies safeguarded riverbed depths at each crossing.
2.1.5	N/A	Cumulative effects	Several consultation responses have referenced the potential for interactions between the proposed development and Thames Tideway Tunnel (see appendix 2 of this Opinion). The

ID	Ref	Description	Inspectorate's comments
			applicant is requested to consider this and where possible provide evidence of agreements with Thames Tideway Tunnel to demonstrate agreed effects. Furthermore, the ES should include a river plan showing the location of any known infrastructure in the freshwater and marine environment to ensure that all potential effects and interactions are assessed. The applicant is encouraged to liaise with the PLA on this matter.
2.1.6	N/A	Mitigation and Monitoring	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant stakeholders and the ES should explain how they would be secured through the DCO. To ensure the EIA process is proportionate and front-loaded, the relevant control and management plans submitted with the application should also clearly identify and explain in detail the avoidance and mitigation measures that are already known, deliverable, and not dependent on further pre-construction surveys.
2.1.7	N/A	Environmental Data Sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development will be shared with relevant recording schemes and data depositories, such as Local Environmental Records Centre(s). The ES should also clearly describe how this data-sharing will be secured through the DCO.
2.1.8	N/A	Bentonite breakout	Bentonite and other break out(s) in relation to Horizontal Directional Drilling (HDD) have not been discussed within the Scoping Report, and the applicant should note that this therefore has not been considered as a potential effect of the proposed development when concluding on whether matters are agreed to be scoped out of the ES. The applicant is requested to consider this when determining the final scope of the ES.
2.1.9	Section 5.11 and Appendix 5-1	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's

ID	Ref	Description	Inspectorate's comments
			likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air Quality

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 6-6 and para 6.5.9	All effects relating to operation of the proposed development - Operation	The Scoping Report states that emissions would be restricted to those associated with road traffic movements during occasional inspection and maintenance activities. The Inspectorate notes that paragraph 6.5.9 states that operational traffic movements will be submitted as part of the ES to justify scoping the matter out. The Inspectorate is content to scope this matter out on the basis that the ES provides a statement, supported by information on expected vehicle types and likely number and routing of vehicle movements and the locations of the nearest sensitive receptors, to justify no likely significant effects.
3.1.2	Table 6-6 and para 6.5.10 and section 2.8	All effects relating to the decommissioning of the proposed development - Decommissioning	The Scoping Report states that decommissioning would not require ground works or vehicle movements of a scale sufficient to trigger a detailed air quality assessment. Furthermore, the Scoping Report notes that it is not intended for the proposed development to be decommissioned, and any decommissioning would relate to the MAP above ground works only. Paragraphs 6.5.10-6.5.11 also state that standard good practice dust management measures would be expected to avoid any likely significant effects. On this basis, the Inspectorate agrees to scope this matter out of the ES. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.1.3	Section 6.2	Study Area	It is likely that the construction of the proposed development will result in road closures and diversions in the area of construction works. The study area should take account of any proposed diversion routes in the air quality assessment.

ID	Ref	Description	Inspectorate's comments
			The Inspectorate notes that Scoping Report paragraph 6.2.6 indicates that the study area for road traffic emissions cannot be defined at this time and is due to be refined to focus on Likely Significant Effects (LSE) within the Institute of Air Quality Management (IAQM) guidance distances listed in paragraphs 6.2.4-6.2.5.
3.1.4	Section 6.3	Relevant Legislation, Planning Policy and Guidance	The applicant's attention is drawn to the Defra advice 'PM _{2.5} Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution during construction have been identified and how action has been taken to minimise emissions of PM _{2.5} or its precursors.
3.1.5	Sections 6.4 and 6.6	Baseline Conditions and Assessment Methodology	The ES should identify the locations of the local authority monitoring stations (continuous analysers/ automatic networks) and diffusion tubes (and any other non-automatic networks) within the agreed study area (including additional areas identified as a result of road closures and diversions) on a plan.
3.1.6	Section 6.4	Baseline Conditions	Scoping Report paragraph 6.4.3 states that there is no quantitative baseline information for dust deposition in the study area as ambient dust deposition is not monitored extensively in the UK. This should be made clear in the ES.
3.1.7	Para 6.4.12	Future Baseline	Scoping Report paragraph 6.4.12 states that the assessment assumes improvements in air quality to continue due to decarbonisation of the transport and energy sector. The ES should provide further justification of this assumption. Where possible, agreement from relevant statutory bodies should be demonstrated in the ES.
3.1.8	Section 6.5	Potential for likely significant effects	The Inspectorate notes that Scoping Report paragraph 6.5.6 states that construction vehicle movements are not known at this time, but a detailed air quality assessment is likely to be required as a result of spoil removal from tunnel boring works based on the IAQM criteria detailed in 6.2.4. It is also noted that road closures required as part of the construction period may require diversions of traffic. In terms of the assessment, this should ensure that the study area encompasses all likely significant effects Furthermore, if

ID	Ref	Description	Inspectorate's comments
			there is the potential for a significant effect on the Air Quality Management Areas (AQMAS) and their Action Plans, this should be assessed within the ES.
3.1.9	Section 6.5	Potential for likely significant effects	The assessment of effects in the ES will need to consider the scenario where there could be two or more areas of construction in proximity of the same receptor, with the potential to create dust emissions from two or more areas merging to create a greater impact. For example, the central area of Figure 6-1, sheet 5 shows overlapping study areas. The programme of works should detail if and where this scenario may arise both in written detail and as marked areas of updated Dust Assessment Area Plans.
3.1.10	Para 6.6.4	Quantitative assessment of Tunnel Boring Machine (TBM) site plant emissions	The Scoping Report states that the assessment is likely to use dispersion modelling software to predict the dispersion of emissions from relevant generator stacks, using emissions data provided by the plant vendor and hourly sequential meteorological data from a representative monitoring site. The ES should refer to any decision regarding Best Available Techniques (BAT) and any sensitivity testing which has been undertaken. The ES should clearly explain the assumptions that have been made in the air quality assessment regarding the number, placement, height and diameter of the stacks.

3.2 Climate

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Tables 7-6 and 7-14	Climate Change Risk (CCR) assessment - sea temperature rise – all phases	The Scoping Report scopes in the CCR assessment but scopes out sea temperature rise on the basis that the proposed development comprises predominantly underground infrastructure with no direct operational dependency on seawater temperature. On this basis, the Inspectorate is content to scope this matter out.
3.2.2	Tables 7-7 and 7-14	In-combination Climate Change Impact (ICCI) assessment (construction and operation): • extreme weather events • precipitation change • temperature change • sea level rise	The Scoping Report proposes to scope out an ICCI assessment on the basis that the environmental effects of the proposed development assessed across the technical topics are not predicted to be exacerbated by climate change to a degree that would result in a significant in-combination effect on the identified receptors. Scoping Report table 7-7 states that impacts of extreme weather events, precipitation change and sea level rise on receptors in the surrounding environment will be taken into account in other standalone technical reports to the ES such as the flood risk assessment to be submitted with the DCO application. The following topics are to be scoped out of the ICCI assessment: • Temperature change is scoped out on the basis that contribution of the proposed development to cumulative thermal impact on receptors is considered negligible. • Sea temperature rise is scoped out on the basis that the proposed development mainly comprises of underground infrastructure with minimal reliance on seawater temperature. • Wind conditions is scoped out on the basis that there is no evidence of compelling trends when considering maximum gust speed in the UK wind network over the last

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• sea temperature rise • wind conditions	five decades and the proposed development, in combination with projected changes in wind patterns, is not expected to have a significant effect upon receptors. The Inspectorate agrees that the proposed development in-combination with the environmental receptors in the surrounding area is not likely to contribute significantly to impacts associated with extreme weather events, precipitation change, temperature change, sea level rise, sea temperature rise, and wind conditions. These matters can therefore be scoped out of further ICCI assessment, however where matters are being assessed elsewhere in the ES, clear cross-referencing should be provided to ensure a robust assessment.
3.2.3	Table 7-14	Cumulative assessment - construction and operation	The Scoping Report proposes to scope out the cumulative assessment as it is not expected for there to be any cumulative impacts on the proposed development with regards to the CCR or ICCI assessment. The Inspectorate notes reference to the Institute of Sustainability and Environmental Professionals (ISEP) Greenhouse Gas (GHG) assessment guidance (2026) and that cumulative emissions are intrinsic to defining the receptor (atmospheric concentration of GHGs) as highly sensitive to further emissions and agrees that cumulative projects are not required to be assessed individually. On this basis, the Inspectorate agrees that cumulative assessment of GHG emissions can be scoped out of the ES.
3.2.4	Tables 7-5 and 7-14	Potential sources of GHG emissions – pre-construction	The Scoping Report scopes in the lifecycle GHG impact assessment but seeks to scope out pre-construction on the basis that the emissions are not anticipated to be material to the overall assessment. The Inspectorate agrees that emissions associated with energy use and transportation demands from preliminary studies and work are likely to be low and not contribute to the emissions individually. On this basis, the Inspectorate is content to scope this matter out, however, the pre-construction emissions should be considered in the overall lifecycle GHG assessment as they are part of the whole lifecycle of the proposed development.

ID	Ref	Description	Inspectorate's comments
3.2.5	Paras 7.8.2 and 7.8.3	Assumptions and limitations	The Scoping Report states that where quantitative data is not available, reasonable assumptions will be made, and that where this is not possible, a qualitative statement will be made on the environmental impacts based on industry approximations and professional best practice. Where LSE assessments are made based on professional judgement, this should be fully justified in the ES with a clear explanation of how any conclusions have been reached.
3.2.6	Section 7.4	Baseline	The baseline applicable to the aspect assessment should be consulted on and, where possible, agreed with relevant statutory bodies, such as the EA.

3.3 Ecology

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 8-8 and para 8.4.4	Designated sites of international importance (SACs/ SPAs/ Ramsar sites) – all impacts – construction and operation	The Scoping Report sets out that the closest Internationally designated site is 6.5km from the proposed development in Table 8-8 however para 8.4.4 states that it is 8.3km. This should be clarified. The Scoping Report does however note no potential pathway of effect between the proposed development and the site for the purposes of the ES. As such, the Inspectorate is content to scope this matter out.
3.3.2	Table 8-8 and para 8.4.9	Inner Thames Marshes SSSI (disturbance of potential supporting habitat utilised by bird populations in proximity to any MAP locations adjoining Thames) - operation	The Scoping Report notes that whilst locations of the MAPs are not confirmed, these are to be placed in locations to avoid and reduce environmental impacts. Furthermore, a Landscape and Ecological Management Plan (LEMP) will be in place to cover these works. As such and on the basis that avoidance and mitigation measures will be secured in a LEMP, the Inspectorate is content to scope this matter out. Should the MAP however be placed within or in close proximity to the Inner Thames Marshes SSSI, this matter should be scoped in.
3.3.3	Tables 8-8 and 8-4	All other statutory designated sites (all other impacts) – construction and operation	The Scoping Report notes that impacts on designated sites, not specifically scoped in, are unlikely to give rise to significant effects where the works in the vicinity of these sites are 5m or more below the ground. The Inspectorate is content with this justification and agrees to scope this matter out, providing MAPs are not located within or in close proximity to such sites.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.4	Tables 8-8 and 8-5	Non-Statutory designated sites within 50m of above ground works (disturbance/displacement/degradation) – operation	The Scoping Report identifies at paragraph 2.7.2 that the ES will provide a description of the works expected during operation. The Scoping Report further notes that such works are likely to be required below ground. The Inspectorate is content that these works are unlikely to give rise to significant effects to non-statutory designated sites within 50m of above ground works. The Inspectorate also assumes that this relates to sites beyond 50m of the above ground works.
3.3.5	Table 8-8 and para 2.7.2	Habitats - Locations with above ground works (permanent and temporary habitat loss; habitat degradation/alteration) - operation	The Inspectorate notes that the Scoping Report sets out that likely maintenance activities will be set out in the ES and a description of these are provided in paragraph 2.7.2. It is noted that these activities are likely to be small scale and of a short duration in locations where MAPs have already been established. These works are not intended to require additional habitat loss/ alteration. As such, the Inspectorate is content to scope this matter out. The ES should however scope in the impact of the permanent land loss required, where the MAPs are to be located during operation.
3.3.6	Table 8-8 and section 8.5	Habitats – London Strategic Heat Main (SHM) (i.e. below ground features) (all impacts) – construction and operation	The Scoping Report, due to the depth of the strategic heat main pipeline being at least 5m below the ground surface, deems significant effects on habitats below ground to be unlikely during construction and operation. The Inspectorate is content to scope this matter out however the applicant should demonstrate how this approach ensures no breaking of ground along the pipeline route and note comments made above in ID 2.1.8.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.7	Table 8-8 and section 8.5	Species (Direct mortality/ harm) – construction and operation	The Scoping Report sets out that the Construction Environmental Management Plan (CEMP) and existing legislation will control any effect during construction and operation, with maintenance activities expected to be limited, and therefore will not result in significant effects. The Inspectorate is content with this approach, however the ES should set out information on species likely to be present following further survey work and, where possible, include letters of no impediment from relevant statutory bodies in relation to the provision of wildlife licences.
3.3.8	Table 8-8 and section 8.5	Species – All other species (disturbance/ displacement; habitat degradation/ alteration) - operation	The Inspectorate notes that the Scoping Report sets out that likely maintenance activities will be set out in the ES and a description of these are provided in Scoping Report paragraph 2.7.2. It is noted that these activities are likely to be small scale and of a short duration in locations where MAPs have already been established. These works are not intended to require additional habitat loss/ alteration. As such, the Inspectorate is content to scope this matter out.
3.3.9	Para 8.4.29	Specific surveys for water vole, and otter – all phases	The Inspectorate notes that in the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope out these matters from the assessment, and deems further survey work is required noting that suitable habitat for water vole and otter has been found to be present within the scoping boundary. Furthermore, the Scoping Report is unclear as to whether above ground works are required in Crossness LNR. Accordingly, the ES should include an assessment of these matters or the information referred to, demonstrating agreement with the relevant statutory bodies and the absence of a significant effect.

ID	Ref	Description	Inspectorate's comments
3.3.10	Para 8.4.29	Buffer for otters and water voles during construction	The applicant is requested to agree a buffer with the relevant statutory bodies. It is noted that the Scoping Report sets a working buffer of 5m, whereas 10m is often the agreed working distance that is required. It is noted that no further surveys are planned in relation to otter. Any buffer distance used should be well-evidenced and justified, and the applicant is encouraged to seek agreement from relevant statutory bodies on the buffer and absence of surveys.
3.3.11	Table 8.4 and para 8.46	Study area	Scoping Report paragraph 8.46 states that a 5km study area is adopted for nationally designated sites and includes a reference to table 8-4. Table 8-4 lists nationally designated sites within 10km from the proposed development. The ES should clearly and consistently, with justification, set out the study area used. The applicant should seek to agree a list of designated and non-designated sites to be included in the study area with relevant statutory bodies.
3.3.12	Table 8-5	Ridgeway Site of Importance for Nature Conservation (SINC)	The row in the table for Ridgeway SINC has no tick in the row and therefore the information is unclear. The ES should provide clarity on the applicant's position in relation to the Ridgeway SINC.
3.3.13	Para 8.4.37	Future baseline	The Scoping Report sets out that in relation to NO ₂ , recent trends have shown an improvement in NO ₂ levels. For the future baseline, the Scoping Report sets out that it has considered that this improvement will continue. The ES should set out justification for this assumption and, where possible, agreement from the relevant statutory consultee.
3.3.14	Para 8.6.1	Consultees on survey undertakings	The Inspectorate encourages the applicant to consider whether the Environment Agency should be included on the list of consultees.
3.3.15	Para 8.6.10	Definition of terms	The ES should clearly set out at what point the assessment has considered an effect to be permanent and apply this consistently throughout the ES.

ID	Ref	Description	Inspectorate's comments
3.3.16	Para 8.7.6	Inter-project effects	The ES should clearly set out how it has considered inter-project effects, for example, where mitigation for one aspect may need to be assessed for effects for another aspect.
3.3.17	N/A	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.

3.4 Ground Conditions

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Para 9.4.2	Assessment of soils – all phases	The Scoping Report states that soils are scoped out of assessment due to the urban location. The Inspectorate is in agreement with this insofar as it relates to soils as an agricultural resource or effects to agricultural land quality. However, the ES should assess the effects of the excavation, reuse and potential contamination of any soils and existing soft landscaping present on site.
3.4.2	Para 9.5.5 and Table 9-10	Operational effects	The Scoping Report states that the nature of the proposed development would lead to a limited risk of effects to or from ground conditions during operation, and that any potential contamination that is present would be remediated where required during construction. The Inspectorate also noted that an Operational Environmental Management Plan (OEMP) is proposed to be provided which would detail measures for avoiding contamination impacts during operation. On the basis of the proposed development description and the measures to be secured in the OEMP, the Inspectorate is in agreement that the operational phase can be scoped out of further assessment in relation to those receptors that are to be assessed only within the ground conditions chapter. As noted in the comments provided by the Inspectorate in section 3.14 of this Scoping Opinion, there is uncertainty over the scope of assessment of water resources, which is required to be scoped in (as also indicated by Scoping Report table 11-17).
3.4.3	Para 9.5.6 and Table 9-10	Decommissioning effects	The Scoping Report proposes to scope out an assessment of the decommissioning phase, as decommissioning is not currently proposed, and in the event that the proposed development is decommissioned, this would result in a limited scale of works. The

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Inspectorate is in agreement that the decommissioning phase can be scoped out of further assessment. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.4.4	Para 9.4.17	References	References in this paragraph are to the wrong figures, as Figure 18-1 and 18-3 relate to traffic and transport. The ES should ensure that where cross-references to figures and other aspect chapters are made, that these are accurate.
3.4.5	Paras 9.4.27 and 9.6.3	Unexploded Ordnance Risk (UXO)	The Scoping Report states that a preliminary UXO Risk Assessment will be undertaken as part of the preliminary risk assessment (PRA). This is not listed in the components of the PRA listed at Scoping Report paragraph 9.6.3. The ES should also confirm whether the UXO assessment includes any UXO in the marine environment (the applicant's attention is drawn to the consultation response from the Port of London Authority in appendix 2 of this Opinion).
3.4.6	Para 9.6.4	Provision of ground investigation report	The Scoping Report states that a ground investigation is proposed to confirm the findings of the PRA. The ES should confirm if this is to be undertaken to inform the ES, as other chapters appear to confirm that this would be undertaken at a later, detailed design phase. Where a ground investigation report is not provided to inform the ES, any data gaps as a result of this and how these have been considered should be described.
3.4.7	Table 9-9	Significant of effect	The ES should set out why a high magnitude of impact on a very low sensitivity receptor which would result in a minor effect is determined to be significant.

3.5 Historic Environment

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 10-6 and paras 13.4.31 and 13.4.32	Marine Archaeology – construction	The Scoping Report states that chapter 13: Marine Environment, assessed that there are no anticipated impacts to the marine environment as a result of the proposed development. Chapter 13, table 13-3 states that LSE on archaeological features below the River Thames or other tidal tributaries are considered within chapter 10: Historic Environment, however justification for scoping out marine archaeology during construction has not been identified anywhere in chapter 10. Having noted this however, the Inspectorate and Historic England acknowledge that the river crossings would be undertaken at a depth below the riverbed, and there will be no in-river or riverbank works. On this basis, the Inspectorate is in agreement that effects from this can be scoped out of further assessment.
3.5.2	Table 10-6 and para 10.5.10	Designated and built heritage non designated heritage assets within the EIA Scoping Boundary and within the Study Area – operational above ground impacts arising from lighting, noise and maintenance arising from Maintenance and Access Point (MAP) ground level	The Scoping Report states that the MAP ground level coverings and kiosks are proposed to be scoped out for assessment during the operational phase, as any impacts arising from lighting, noise or maintenance are not likely to significantly alter the settings of heritage assets. The Inspectorate however considers that the permanent presence of the MAPs should be assessed in relation to effects on settings on designated and built heritage non-designated assets. This is also raised as a matter in the Historic England consultation response (see appendix 2 of this Opinion). On this basis, the Inspectorate is not in agreement that effects from this can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		coverings and kiosks – operation	
3.5.3	Table 10-6 and para 10.5.11	Non-designated heritage assets with below ground archaeological remains and deposits – operation	The Scoping Report states that significant effects are not expected in relation to buried archaeology during the operational phase of the proposed development. On the basis that impacts on unknown/ known below ground archaeological remains would only occur during construction and therefore no additional potential direct impacts to heritage assets would occur during operation, the Inspectorate agrees that this can be scoped out of further assessment.
3.5.4	Table 10-6 and para 10.5.12	All impacts/ heritage assets – decommissioning	The Scoping Report proposes to scope out an assessment of the decommissioning phase, as decommissioning is not currently proposed. In the event that the proposed development is decommissioned, this would result in a limited scale of works to remove above ground infrastructure and underground pipeline are expected to be left in-situ to minimise adverse environmental effects. On this basis, the Inspectorate is in agreement that the decommissioning phase can be scoped out of further assessment. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.5.5	Section 10.2	Study area	A 100m distance has been used as the study area. The ES should provide a justification for the study area including agreement with the relevant statutory bodies. The study area should be defined by receptors of LSE and not an arbitrary distance. It should be clearly outlined in the ES whether the study area is amended or not for designated and non-designated heritage assets (paragraph 10.2.4). The applicant's attention is drawn to the consultation response from Historic England (see appendix 2 of this Opinion) with regard to heritage assets that have not been considered. This includes, but is not limited to, Grade I listed former Crossness Pumping Station,

ID	Ref	Description	Inspectorate's comments
			various listed buildings within the former Woolwich Arsenal, Southwark Underground Station, and the Grade I listed former Church of St. John, Smith Square.
3.5.6	Para 10.4.4	Labelling and identifying possible listed buildings outside the study area	Grade I listed 'Former Crossness Pumping Station' is described in paragraph 10.4.4. Paragraph 10.4.4 states that the Crossness Conservation Area (located within the study area) which centres on the Grade I listed building is located outside the study area. Although located beyond the study area, the ES should ensure that it displays this on the figure to understand whether the setting of the listed building would be affected.
3.5.7	Figure 10-2	Clustered labelling	The sheets provided in Scoping Report volume 2, figure 10-2 have clustered labelling, and it is difficult to distinguish a specific non-designated monument. The ES should ensure that figures are easily readable and identifiable.
3.5.8	Para 10.8.1	Assumptions and limitations	The Scoping Report states that where quantitative data is not available, reasonable assumptions will be made, and that where this is not possible a qualitative statement will be made on the environmental impacts based on industry approximations and professional best practice. Where LSE assessments are made based on professional judgement, this should be fully justified in the ES with a clear explanation of how any conclusions have been reached and, where possible, demonstration of agreement with relevant statutory bodies.
3.5.9	N/A	Alternative locations for MAPs, tunnel heads, and construction sites	The applicant's attention is drawn to the consultation response from Historic England (see appendix 2 of this Opinion) with regard to the selection of sites and considering alternative options. Where alternative options are considered, this should be justified in the ES with a clear explanation of how conclusions have been reached and, where possible, a demonstration of agreement with Historic England and other relevant local authorities.
3.5.10	N/A	World Heritage Site and Heritage Impact Assessment	The applicant's attention is drawn to the consultation response from Historic England (see appendix 2 of this Opinion) with regard to implementing an iterative process of heritage impact assessment using the 'UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022)'.

3.6 Human Health

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Table 11-17	Healthcare and other social infrastructure - Change in access to and demand for healthcare services and other community facilities – operation	The Scoping Report states that significant effects to access and demand for existing social and healthcare infrastructure are unlikely during operation as activities will be minimal. The Inspectorate is content to scope this matter out.
3.6.2	Table 11-17	Open space, play and leisure - Changes in availability and quality of, and access to, public areas of open space and recreational walking and cycling routes - operation	The Scoping Report states that significant effects to the availability and quality of open space, play and leisure facilities are unlikely during operation as activities will be minimal. The Inspectorate is content to scope this matter out.
3.6.3	Para 11.5.5 and Table 11-17	Transport modes, access and connections - Changes in	The Scoping Report states that significant effects to transport modes, access and connections are unlikely during operation as there would be a limited amount of additional traffic generated by maintenance and operational activities. The Inspectorate is content to scope this matter out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		community severance, vehicles on the local road network and public transport - operation	
3.6.4	Para 11.5.4 and Table 11-17	Economic environment (employment and income, education and training opportunities) - Direct and indirect job creation and economic activity, as well as educational opportunities and support - operation	The Scoping Report states that significant beneficial effects to the economic environment are unlikely during operation as there would be limited additional employment opportunities. The Inspectorate is also content that significant adverse effects would not be expected. The Inspectorate is content to scope this matter out.
3.6.5	Para 11.5.6 and Table 11-17	Air quality - Changes in air pollutants from construction activities and construction road traffic - operation	The Scoping Report states that all air quality effects have been scoped out of the assessment and therefore the Inspectorate agrees that for this chapter, this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.6	Table 11-17	Townscape and visual amenity - Changes in visual amenity of public areas of open space, active travel walking and cycling routes - operation	The Scoping Report states that significant effects to townscape and visual receptors are unlikely during operation as activities will be minimal, cross-referencing details set out in Scoping Report chapter 17: Townscape and Visual. On this basis, the Inspectorate is in agreement that this can be scoped out.
3.6.7	Table 11-17	Changes in water availability – construction and operation	The Scoping Report, for human health, states that significant effects to water availability are unlikely during construction and operation. However, this is noted to be inconsistent with the water environment chapter 19, which scoped in water resource availability with the exception of potable water. The Inspectorate is therefore not in agreement that effects from this can be scoped out of further assessment based on the information provided.
3.6.8	Para 11.5.6 and Table 11-17	Land quality - Physical health effects associated with contaminated soils (e.g. contact) and secondary pathways such as dust generation or impacts on food production - operation	Referring to Chapter 9: Ground Conditions, the Scoping Report states that significant effects to land quality are unlikely during operation as maintenance activities during the operation phase will be managed through an OEMP. Provided that the OEMP is secured within the dDCO, the Inspectorate is in agreement that effects from this can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.9	Table 11-17	Health-related behaviours - physical activity; risk taking behaviour; diet and nutrition. Changes to levels of physical activity, risk taking behaviour and consideration for diet and nutrition – construction and operation	The Scoping Report states that significant effects to health-related behaviours are unlikely during construction and operation as the nature of the proposed development would not result in changes to risk taking behaviour or diet and nutrition. It also states that physical activity is scoped out, noting changes in physical activity will be detailed as part of the assessment of effects to open space, play and leisure as a health determinant which is proposed to be scoped in for the construction phase. The Inspectorate is in agreement that effects from this can be scoped out of further assessment.
3.6.10	Table 11-17	Housing - Changes to housing need and provision and changes to access to residential properties – construction and operation	The Scoping Report acknowledges disruption to residential properties during construction which it seeks to scope in. Referring to chapter 16: Socioeconomics, the Scoping Report states that effects to housing provision are unlikely during construction and operation as during construction, the workforce will be largely drawn from London and surrounding area, and any non-local workers are expected to be temporary and to primarily use visitor accommodation. During operation, the Scoping Report notes that the nature of the proposed development and operational requirements are unlikely to result in significant effects. The Inspectorate agrees that, with the exception of disruption of access to residential properties during construction, significant effects from this matter can be scoped out.
3.6.11	Table 11-17	Social participation, interaction and support - Changes to opportunities for	The Scoping Report states that significant effects to social participation are unlikely during operation as activities will be minimal. The Inspectorate agrees that this can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		community participation and interaction, and for social and family support - operation	
3.6.12	Table 11-17	Social environment - relocation; community safety; community identity; and culture, resilience and influence. Changes to perception and actual level of risk and crime. Changes to community identity such as sense of belonging - operation	The Scoping Report states that significant effects to the social environment are unlikely during operation as activities will be minimal. The Inspectorate agrees that this can be scoped out.
3.6.13	Table 11-17	Bio-physical environment: radiation - Changes to exposure to radiation risks – construction and operation	The Scoping Report states that effects from radiation are unlikely during construction and operation as no substantial sources of radiation are noted to be required, furthermore, electricity cabling used will be of a standard design and type. The Inspectorate agrees that effects from this can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.14	Table 11-17	Institutional and built environment: wider societal infrastructure and resources - Changes to features of the built environment and wider public health environment that contribute to physical and mental health outcomes – construction and operation	The Scoping Report states that significant effects to the institutional and built environment are unlikely during construction and operation as no additional receptors have been identified other than those already included for assessment for effects on 'healthcare and social infrastructure'. The Inspectorate agrees that effects from this matter can be scoped out.
3.6.15	Paras 11.5.7 - 11.5.8 and Table 11-17	Human Health Effects during decommissioning	The Scoping Report states that effects are unlikely during decommissioning as decommissioning is not currently proposed, and if this were to be undertaken, activities will be minimal as the heat main pipes would be expected to be left in situ. The Inspectorate agrees that effects from this can be scoped out.

3.7 Major Accidents and Disasters (MAD)

(Scoping Report Section 12 and Appendix 12-1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Para 12.4.4 A – D and Appendix 12-1	Extreme weather events – construction, operation and decommissioning: • drought • heatwaves • low temperatures and heavy snow • storms • severe meteorology e.g. electrical storms	The Scoping Report states that the effects of extreme weather on the proposed development are to be assessed as part of the climate chapter of the ES where required, and therefore a separate assessment of MAD is not required. The Inspectorate agrees with this approach, noting that the listed extreme weather events are being considered in Chapter 7: Climate and therefore can be scoped out of an assessment in a MAD chapter.
3.7.2	Para 12.4.4 E and Appendix 12-1	Natural hazards – construction, operation and decommissioning: • Earthquakes • Volcanic eruptions	The Scoping Report states that the geographic location of the proposed development is not at risk of earthquakes or volcanic eruptions. The Inspectorate agrees that effects from these can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.3	Para 12.4.4 F and Appendix 12-1	Wildfires – construction, operation and decommissioning	The Scoping Report states that risks of wildfires would be controlled by existing requirements and legislation relating to fire safety. On this basis, and the geographic location of the proposed development being in a dense urban area, the Inspectorate is in agreement that effects from this can be scoped out.
3.7.4	Paras 12.4.4 G, 12.4.5 E and Appendix 12-1	Flooding – construction, operation and decommissioning	The Scoping Report states that risks from flooding would be assessed within the Flood Risk Assessment to be provided with the application, and therefore a separate assessment of MAD is not required. The Inspectorate agrees with this approach, and that flood risk can be scoped out of an assessment in a MAD chapter.
3.7.5	Appendix 12-1	Aircraft incident - – construction and decommissioning	The Scoping Report states that the proposed development is not in close proximity to any relevant airports (including London City) and therefore there is no increased risk of an aircraft incident. The Inspectorate agrees that significant effects from this can be scoped out. The ES however should describe how the elements of the proposed development which are to be of 50 metres or more in height at the Riverside Campus are to be lit during operation, and where possible include agreement on this lighting scheme from relevant statutory bodies.
3.7.6	Para 12.4.4 H and Appendix 12-1	Accidents and incidents – construction, operation and decommissioning:	The Scoping Report states that incidents to and from nearby industrial installations and COMAH sites are unlikely and would be controlled by the operators' management systems and under the requirements of the relevant legislation. The Inspectorate agrees that effects from these can be scoped out of further assessment, however, the applicant should seek to include agreements that sufficient management systems are in place by the operators of those sites and include these in the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		- An incident at a neighbouring facility - Impacts from nearby Control of Major Accident Hazards (COMAH) Sites - Impacts to nearby COMAH sites	
3.7.7	Para 12.4.4 I and Appendix 12-1	Fire and explosion including UXO risk – construction, operation and decommissioning	The Scoping Report states that risks of fires and explosion would be controlled by existing requirements and legislation relating to fire safety. Additionally, the high UXO risk in the area of the proposed development would be controlled by measures within the CEMP. On the basis that the CEMP including UXO mitigation is secured within the dDCO, the Inspectorate agrees that significant effects from these can be scoped out.
3.7.8	Para 12.4.4 E Appendix 12-1	Outage causing the proposed development to lose thermal energy - operation	The Scoping Report states that the proposed development would be able to remain functional for a short duration in the event of an unplanned outage or be designed to be able to be gradually shut down from the Riverside Campus. The Inspectorate agrees that significant effects from this can be scoped out.
3.7.9	Para 12.4.4 J and	Ground or structural collapse - construction,	The Scoping Report states that risks relating to ground or structural collapse will be addressed by the implementation of a ground investigation report and geotechnical design report which would be undertaken to inform detailed design. Additionally, the pipeline would be designed to the relevant design standards to prevent damage. The Scoping

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Appendix 12-1	operation and decommissioning	Report also notes that an assessment in relation to ground stability will be undertaken for the ground condition assessment. On the basis that the ground investigation and reporting is detailed in the ES, and appropriate mitigation measures are secured within the dDCO, the Inspectorate agrees that significant effects from these can be scoped out.
3.7.10	Para 12.4.5 D and Appendix 12-1	Pipeline collapse or burst – Construction and operation	The Scoping Report states that the pipeline would be designed to the relevant regulations and through geotechnical design in accordance with relevant standards to minimise the risk of collapse. The Scoping Report also notes that an assessment in relation to ground stability will be undertaken for the ground condition assessment. On the basis that the ground investigation and reporting is detailed in the ES, and appropriate mitigation measures are secured within the dDCO, the Inspectorate agrees that significant effects from these can be scoped out.
3.7.11	Para 12.4.4 F and Appendix 12-1	Major accidents caused by malicious acts of vandalism - construction, operation and decommissioning	The Scoping Report states that security arrangements would be implemented for the safe operation of the proposed development in line with industry good practice. The Inspectorate agrees that significant effects from this can be scoped out. However, the applicant should seek to include agreements that sufficient security arrangements are in place by relevant statutory bodies and operators of sensitive sites within or in close proximity to the proposed development and include these in the ES.
3.7.12	Para 12.4.4 K and Appendix 12-1	Outbreak of disease - construction, operation and decommissioning	The Scoping Report states that national and regional guidelines would be enforced on the site of the proposed development. The Inspectorate agrees that significant effects from this can be scoped out.
3.7.13	Para 12.4.5 A	Full or partial obstruction of	The Scoping Report states that significant effects as a result of blocking access of emergency services by construction traffic and works would be controlled by measures

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and Appendix 12-1	emergency services - construction	within the Construction Logistics Plan (CLP). On the basis that these measures within the CLP are secured through the dDCO, the Inspectorate agrees that significant effects from this can be scoped out of further assessment.
3.7.14	Para 12.4.5 B and Appendix 12-1	Impairment, interruption or severance of existing utilities - construction	The Scoping Report states that the risk of damaging utilities would be addressed by the inclusion of protective provision within the dDCO, and measures to be secured within the CEMP. On the basis that protective provisions and measures within the CEMP are secured through the dDCO, the Inspectorate agrees that significant effects from this can be scoped out.
3.7.15	Para 12.4.5 F and Appendix 12-1	Pollution incidents - construction, operation and decommissioning	The Scoping Report states that pollution incidents would be controlled by measures secured within the CEMP, including an emergency response plan. The Inspectorate also notes that pollution risks to land and water resources are scoped into the assessment within ground conditions and/ or water resources chapters. The Inspectorate agrees that effects from this can be scoped out of further assessment in a MAD chapter.
3.7.16	Para 12.4.5 C and Appendix 12-1	Structural damage or ground settlement - construction	The Scoping Report states that significant effects from structural damage or ground settlement would be addressed by the inclusion of protective provision within the dDCO. The Scoping Report also notes that an assessment in relation to ground stability will be undertaken for the ground condition assessment. On the basis that the ground investigation and reporting is detailed in the ES, and appropriate mitigation measures are secured within the dDCO, the Inspectorate agrees that significant effects from these can be scoped out.
3.7.17	Para 12.4.5 G and Appendix 12-1	Railway incident - construction	The Scoping Report states that significant effects to existing railway infrastructure such as tunnels would be addressed by the inclusion of protective provision within the dDCO. The Inspectorate agrees that effects from this can be scoped out of further assessment, however the applicant's attention is drawn to the consultation response from Transport for London in relation to requirements of considering protection against catastrophic failure

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			during operation and the requirement for additional control measures (see appendix 2 of this Opinion). The Inspectorate does however consider that the ES should confirm the vulnerability of the proposed development to railway incidents (for example any potential for a train crash to damage the pipeline or other infrastructure) that are not caused by the proposed development during construction and operation.
3.7.18	Para 12.4.5 H and Appendix 12-1	Road traffic accident on the wider traffic network - construction	The Scoping Report states that significant effects from accident risk as a result of construction traffic and works would be controlled by measures within the CLP. On the basis that measures within the CLP is secured through the dDCO, the Inspectorate agrees that significant effects from this can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.7.19	Para 12.5.6	Provision of supporting evidence	The Scoping Report states that the ES will include an updated version of Appendix 12-1 which provides the justification for scoping out of all MAD within a specific chapter and signposting to where relevant MAD are assessed in other chapters. The Inspectorate agrees with this approach, however notes that the ES should also include evidence of agreement with the relevant statutory bodies. The applicant's attention is also drawn to the response from the Health and Safety Executive in appendix 2 of this Opinion which details the relevant Major Accident Hazard sites and pipelines.

3.8 Marine Environment

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
Water Quality			
3.8.1	Table 13-3 and para 13.2.2	Impact on water quality (chemical/ temperature/ salinity) due to direct abstraction or discharges from the River Thames - construction.	The Inspectorate is content to scope this matter out. The proposed development will not abstract water from. or discharge water to, the River Thames and any works close to the river (tunnel entry and exit points) will be controlled by standard control measures in the CEMP. The ES should include sufficient evidence of mitigation and control measures to ensure that no likely significant effects are expected from bentonite break out, sediment disturbance, and heat transfer from the pipes. Where possible, this should be agreed with the Environment Agency and secured in the dDCO.
Marine/ estuarine sediments			
3.8.2	Table 13-3 and para 13.5.2	Direct sediment disturbance - construction	The Inspectorate is content to scope this matter out, noting that there are no works planned within the River Thames or its tributaries. The Inspectorate would expect a CEMP to ensure embedded mitigation is in place for any work required on or near the banks of the River Thames.
3.8.3	Table 13-3 and para 13.5.2	Changes to hydrodynamic and sediment transport processes - construction	The Inspectorate is content to scope this matter out, noting that there are no works planned within the River Thames or its tributaries. The Inspectorate would expect a CEMP to ensure embedded mitigation is in place for any work required on or near the banks of the River Thames.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.4	Table 13-3	Sediment/ riverbed disturbance due to ground-borne vibrations – construction	The Inspectorate agrees to scope this matter out noting that the diameter of the pipelines and the depths of construction are unlikely to result in significant effects in relation to vibration.
Intertidal/ subtidal habitats			
3.8.5	Table 13-3 and para 13.5.2	Direct habitat loss – construction	The Scoping Report sets out that no works are required to the River Thames up to Mean High Water Springs (MHWS). As such, the Inspectorate is content to scope this matter out in relation to this aspect topic, however the applicant should consider comments made in relation to Ecology before considering whether this topic should be scoped in for Ecology.
3.8.6	Table 13-3 and para 13.5.2	Increased turbidity (suspended sediment concentration, SSC) and smothering (sediment deposition) due to sediment disturbance – construction	The Scoping Report commits to no works being required in the vicinity of the River Thames or its tributaries. Furthermore, the pipes themselves are 2.1m in diameter and unlikely to give rise to significant effects. The Inspectorate agrees to scope this matter out, however, the ES should include sufficient evidence of mitigation measures, secured within the dDCO, to ensure that no likely significant effects are expected from bentonite break out and sediment disturbance. Where possible, this should be agreed with the Environment Agency.
3.8.7	Table 13-3 and paras 13.2.2 and 13.5.2	Changes in water quality/ release of contaminants – construction	The Inspectorate is content to scope this matter out. The proposed development will not abstract water from, or discharge water to, the River Thames. There are no planned in river works up to MHWS and below ground crossings will not give rise to disturbance of river sediment. No pathway for effects on fish or shellfish have been identified from the release of contaminants. However, the ES should include sufficient evidence of mitigation

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			measures, secured within the dDCO, to ensure that no likely significant effects are expected from bentonite break out and sediment disturbance. Where possible, this should be agreed with the Environment Agency.
Fish and shellfish			
3.8.8	Table 13-3 and para 13.5.2	Direct disturbance or habitat loss – construction	The Inspectorate notes that the proposed development does not require any in-river works up to MHWS and that crossings are trenchless and at depth. The Inspectorate agrees that there is no pathway for effect on fish and shellfish or supporting habitats and therefore is content to scope this matter out.
3.8.9	Table 13-3 and para 13.5.2	Increased turbidity (SSC) and smothering (sediment deposition) due to sediment disturbance – construction	The Scoping Report commits to no works being required in the vicinity of the River Thames or its tributaries. Furthermore, the pipes themselves are 2.1m in diameter and unlikely to give rise to significant effects. The Inspectorate is content that there is no pathway for effects on fish and shellfish from this matter. The Inspectorate agrees to scope this matter out.
3.8.10	Table 13-3 and paras 13.2.2 and 13.5.2	Changes in water quality/ release of contaminants – construction	The Inspectorate is content to scope this matter out. The proposed development will not abstract water from, or discharge water to, the River Thames. There are no planned in river works up to MHWS and below ground crossings will not give rise to disturbance of river sediment. No pathway for effects on fish or shellfish have been identified from the release of contaminants. The Inspectorate agrees to scope this matter out.
3.8.11	Table 13-3 and para 13.5.2	Noise and vibration - construction	The Scoping Report sets out that as a result of the diameter of the pipes, the depth of the pipes and the use of pipe-jacking, no significant effects are expected from noise and vibration. The Inspectorate is content to scope this matter out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
Other notable marine species			
3.8.12	Table 13-3 and para 13.5.2	Direct disturbance - construction	The Inspectorate is content to scope this matter out, as no in river works are required and therefore no potential for direct disturbance and therefore no pathway of effect is present.
3.8.13	Table 13-3 and para 13.5.2	Increased SSC/ changes in water quality – construction	The Scoping Report sets out there are to be no in river works and no abstraction from, or discharge to, the River Thames or its tributaries. As such, there is no pathway of effect for other notable marine species. The Inspectorate is content to scope this matter out.
3.8.14	Table 13-3 and para 13.5.2	Noise and vibration - construction	The Scoping Report sets out that as a result of the diameter of the pipes, the depth of the pipes and the use of pipe-jacking, no significant effects are expected from noise and vibration on other notable marine species. The Inspectorate is content to scope this matter out.
3.8.15	Table 13-3 and para 13.5.2	Marine non-native invasive species - construction	The Inspectorate is content to scope this matter out on the basis that no in river works are required and that a non-native species management plan would be secured within the dDCO.
Marine protected sites			
3.8.16	Table 13-3	Topics as identified above - construction	The Scoping Report states that there are no designated marine sites in the study area and no hydrological links identified to the study area, and therefore no potential for significant effects. The Inspectorate is content to scope this matter out if this is correct, however, noting Scoping Report paragraphs 13.4.23 – 13.4.26, the ES should set out the distance of the study area and confirm no hydrological links.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
Navigation/ other river users			
3.8.17	Table 13-3 and paras 13.5.2 and 13.5.3	Direct obstruction through in-river construction activities and use of river transport - construction	The Scoping Report sets out that no construction activities are to take place in the River Thames or its tributaries. The Scoping Report also sets out that it is not proposed to use the River Thames for transport of construction materials. As such, no significant effects are expected. The Inspectorate is content to scope this matter out.
Marine Archaeology (historic environment within the tidal Thames)			
3.8.18	Table 13-3 and para 13.5.2	Potential effects on submerged archaeological remains due to ground disturbance or vibration from tunnelling – construction	The Scoping Report sets out that as a result of the diameter of the pipes, the depth of the pipes and the use of pipe-jacking, along with no dredging, piling, excavation or physical disturbance of the riverbed is anticipated, no significant effects are expected. The Inspectorate is content to scope this matter out of this aspect topic.
Water Quality			
3.8.19	Table 13-3 and para 13.2.2	Impact on water quality (chemical/ temperature/ salinity) due to direct abstraction or discharges from the	The Scoping Report states that during operation; the pipelines will be a closed loop system. There are to be no abstractions from, or discharges to, the River Thames. Surface water run off during operation is to be controlled through the OEMP. No likely significant effects are predicted. The Inspectorate agrees that this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		River Thames - operation	
		• Intertidal/ subtidal habitats and species • Fish and shellfish • Notable marine species	
3.8.20	Table 13-3 and para 13.5.2	Thermal Emissions - operation	The Scoping Report sets out that the pipelines will be fully insulated and designed to avoid heat loss. Furthermore, the pipelines will be buried at least 5m below ground. The Inspectorate agrees that this matter can be scoped out.
All Marine receptors			
3.8.21	Table 13-3	Decommissioning	The Scoping Report sets out that effects are likely to be similar or less than those during construction and no likely significant effects have been identified during construction. The Inspectorate therefore is content to scope this matter out. See ID 2.1.2.
Cumulative effects marine			
3.8.22	Table 13-3	Interaction with other plans, projects and land based activities - decommissioning	The Inspectorate agrees to scope this matter out noting that the Scoping Report has not identified any pathways for effects for the marine environment. The proposed development does not introduce pathways for effects to any tidal river receptors. Land based activities with the potential to effect water quality are assumed to have mitigation measures to control impacts at source. The Inspectorate is content to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.8.23	Para 13.6.1	Assumptions	The Inspectorate has agreed to scope this aspect out based on the project description and the assumptions listed in Scoping Report paragraph 13.6.1 and therefore should this change, the scope should be re-considered.

3.9 Materials and Waste

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Paras 14.5.3 and 14.5.4 and Table 14-17	Changes in demand for materials – operation and decommissioning	The Scoping Report states that the quantity of any material used during operation and decommissioning is likely to be limited, and therefore significant effects are unlikely. The Inspectorate agrees that effects on demand for materials can be scoped out of further assessment for operation and decommissioning. See ID 2.1.2.
3.9.2	Paras 14.5.3 and 14.5.4 and Table 14-17	Changes in available landfill void capacity – operation and decommissioning	The Scoping Report states that the quantity of waste disposal during operation and decommissioning is likely to be limited as the underground elements would remain in situ, and therefore significant effects are unlikely. The Inspectorate agrees that significant effects on landfill capacity can be scoped out. See ID 2.1.2.
3.9.3	Paras 14.5.3 and 14.5.4 and Table 14-17	Changes to safeguarded mineral sites - construction, operation and decommissioning	The Scoping Report proposes to scope out an assessment of safeguarded mineral sites, citing that no safeguarded mineral sites have been identified to date in the scoping boundary. However, Scoping Report chapter 9: Ground Conditions states that mineral safeguarded areas would be scoped into the assessment of ground conditions or be assessed as part of the accompanying planning statement. On the basis that mineral safeguarding will be assessed in other chapters and/ or application documents, the Inspectorate agrees that effects on this can be scoped out of further assessment within the materials and waste chapter.
3.9.4	Paras 14.5.3 and 14.5.4 and	Changes to safeguarded allocated waste sites - construction,	The Scoping Report states that other than the Riverside campus (which includes two installations), which is owned and operated by the applicant, there are no safeguarded waste sites within the scoping boundary. The Scoping Report notes that as these are built assets and not likely to be permanently affected, significant effects are not likely. The

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Table 14-17	operation and decommissioning	Inspectorate agrees that significant effects to safeguarded waste sites can be scoped out of further assessment.
3.9.5	Paras 14.5.3 and 14.5.4 and Table 14-17	Waste arising from extraction, processing and manufacture of construction components and products - construction, operation and decommissioning	The Scoping Report states that manufacturing of construction materials would be controlled by the producers' own management systems and may also be outside of the geographic scope of the ES as the extraction processing or manufacturing process may be located outside of the United Kingdom. The Inspectorate agrees with this and that effects of material extraction, processing or manufacturing can be scoped out of further assessment.
3.9.6	Paras 14.5.3 and 14.5.4 and Table 14-17	Other environmental likely significant effects associated with the management of waste from the proposed development e.g., on water resources, air quality, noise or traffic resulting from the generation, handling, on-site temporary storage or off-site transport of materials and	The Scoping Report states that these effects would be assessed within the individual aspect chapters and therefore do not need to be further assessed or repeated in the materials and waste chapter. The Inspectorate agrees with this approach providing that sufficient cross referencing is included in the ES to ensure a comprehensive assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		waste - construction, operation and decommissioning	
3.9.7	Paras 14.5.3 and 14.5.4 and Table 14-17	Off-site environmental likely significant effects at waste management Facilities - construction, operation and decommissioning	The Scoping Report states that the effects of off-site waste processing would be considered as part of the planning and permitting regime of the facilities processing the waste, and therefore the applicant seeks to scope this out of the ES. The Inspectorate agrees that significant effects of off-site waste processing can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.9.8	Para 14.4.2	Quantities of construction material (and subsequently waste generation)	The Scoping Report states that the quantities of materials required to construct and operate the proposed development are not yet known. The ES should provide an estimation of these and an explanation as to how these parameters of the assessment are a reasonable worst case to ensure that the impact of the proposed development is assessed. The ES should also subsequently provide estimates of waste generation during the construction, operation and decommissioning (if required) phases and assess this accordingly.
3.9.9	Para 14.4.15	Material reuse and waste management facility capacity	The Scoping Report refers to ISEP guidance which “does not consider waste processing and recovery facilities as sensitive receptors”. However, the geographic nature of the

ID	Ref	Description	Inspectorate's comments
			proposed development means the Inspectorate considers there may be limited opportunity to reuse excavated soils and arisings from tunnelling within the proposed development. The Inspectorate also considers that the effects of the potentially limited reuse opportunities on site, and potential for substantial arisings from the access shafts and c. 55km of tunnelling, should be carefully considered in the ES. Whilst the Inspectorate notes that stated guidance does not typically consider waste transfer or treatment stations to be sensitive receptors, the scale and nature of this project may have the potential to cause capacity issues at these, especially where specialist treatment such as dewatering of tunnelling slurry may be required. The Inspectorate therefore considers that agreement should be sought from relevant statutory bodies to agree that waste processing facilities can be excluded as a sensitive receptor. The ES should also describe whether there has been any identification of potential off site direct reuse (as indicated to be under consideration in Scoping Report paragraph 14.7.4g), as large tunnelling projects frequently have an identified use for excavated material such as habitat creation. If this is proposed, the ES should also assess all relevant beneficial and adverse effects of the transfer of material to this use.

3.10 Noise and Vibration

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 15-14	Construction Traffic Vibration – Construction Phase	The Scoping Report, table 15-14 states that it is assumed that local authorities and Transport for London (TfL) will maintain good quality conditions for highways used to access the proposed development and no significant effects will arise. Scoping Report paragraph 15.5.4 quotes the Design Manual for Roads and Bridges (DMRB) LA 111 (Ref 15.3) which states that “<i>operational vibration is scoped out of the assessment methodology as a maintained road surface will be free of irregularities...so operational vibration will not have the potential to lead to significant adverse effects</i>”. No significant construction traffic vibration effects are therefore expected and can be scoped out of the assessment. The Inspectorate notes the DMRB LA 111 Guidance relates to construction noise and vibration only and the ‘Note’ under section 1: Scope applies only to operational vibration, which can be scoped out of an assessment. The guidance relates to the construction of highway schemes, not general vibration assessment for any development that may impact highways as described in Scoping Report paragraph 1.6 of the guidance. The Inspectorate, therefore, based on the above, is not content to scope this matter out at this time. The applicant should consider the guidance and seek agreement with relevant statutory bodies that this guidance is able to be applied and interpreted in the way in which the Scoping Report sets out before it is to be used to scope this matter out.
3.10.2	Table 15-14	Operational Vibration - operation	The Scoping Report states that no perceptible levels of operational vibration outside the scoping boundary are anticipated. Scoping Report paragraph 15.5.5 states that details of potential noise and vibration emissions of operational plant within each MAP are not known at this stage. However, paragraph 15.5.6 states that no operational plant to be included in the MAP would generate perceptible levels of vibration outside the scoping boundary and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			there will be no associated operational vibration effects. Operational ground-borne vibration is scoped out of any further assessment. The Inspectorate agrees that the operational plant is unlikely to result in significant vibration impacts. However, given that details of potential vibration emissions from plant within each MAP is currently unknown the ES should provide details of vibration impacts from operational plant within each MAP and provide justification that no significant effects are likely. The ES should justify why the Scoping Report refers vibration outside of the scoping boundary as the boundary should cover areas that may be subject to any potential vibration from the operation.
3.10.3	Table 15-14 and 15.5.7	Operational Traffic Noise and Vibration – Operation Phase	The Scoping Report indicates that operational traffic movements will be limited and will not have a significant impact on the existing baseline road-traffic noise or vibration levels. Scoping Report paragraph 15.5.7 states that the proposed development would employ up to eight staff to carry out periodic maintenance at the MAP sites as required and would not be likely to generate a significant change in road traffic noise levels. The Inspectorate agrees that the eight staff carrying out periodic maintenance to the MAP sites would be unlikely to generate significant road traffic noise and vibration effects. This matter can therefore be scoped out of the assessment.
3.10.4	Table 15-14 and paras 15.5.8 – 15.5.9	Decommissioning Noise and Vibration (all sources) – Decommissioning Phase	The Scoping Report states that this has been scoped out due to the minor scale of works required, which are unlikely to generate significant levels of noise and vibration with the implementation of standard good practice measures. The Inspectorate notes the likely small scale of works are not likely to result in significant noise and vibration from many sources and agrees that this can be scoped out. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.10.5	Section 15.2	Study Area	The Scoping Report states that it is likely that construction of the proposed development will result in road closures and diversions in the area of construction works. The study area described in section 15.2 will need to take account of any proposed diversion routes in the construction traffic noise assessment. The proposed study area should be illustrated on a plan provided with the ES, to include additional areas subject to construction and other traffic as a result of road closures and diversions (including all sensitive receptors). It is noted that Scoping Report paragraph 15.2.3 indicates that the study area refers to BS 5228-2 and DMRB LA 111 to define the assessment area for ground-borne vibration (and noise) effects. It should be noted that paragraph 1.6 of the DMRB LA 111 states that the guidance applies to highway schemes, not general vibration assessment for development that may impact highways as described and should not normally be relied upon as part of the definition of the study area. As noted above, the ES should provide justification for the use of this guidance. Where assessments are made based on professional judgement, this should be fully justified in the ES with a clear explanation of how any conclusions have been reached and, where possible, demonstration of agreement with relevant statutory bodies.
3.10.6	Section 15.4 and Table 15-3	Baseline Conditions	Scoping Report paragraph 15.4.2 and Table 15-3 detail Noise Important Areas (NIA). References to NIAs should be updated to take account of any additional areas identified as a result of diversions. NIA locations should be presented on a plan submitted with the ES as well as copies of the relevant strategic noise maps.
3.10.7	Section 15.5	Potential for Likely Significant Effects	The assessment of effects during construction should include vehicle noise emissions at additional areas identified as a result of road closures and diversion routes. The additional sensitive receptors assessed should be clearly identified on a plan as part of the ES.
3.10.8	N/A	Structural Integrity of Flood Defences	The applicant's attention is drawn to Appendix B of the consultation response (Appendix 2 of this Opinion) from the Environment Agency in relation to the set back of 16m from tidal flood defences referred to in Scoping Report paragraph 19.7.8(f) for the operational phase.

ID	Ref	Description	Inspectorate's comments
			This should also apply during the construction phase where possible to ensure the structural integrity of the defences, which could be undermined by construction works.

3.11 Socio-economics

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Tables 16-11 and table 16-16 and paras 16.5.5 and 16.5.6	Employment generation - Operation	The Scoping report states that the proposed development is likely to generate beneficial effects on employment, but that those effects are not likely to be significant. It is noted in Scoping Report paragraph 16.5.5, that it is anticipated that up to eight staff are likely to be based at the Riverside Campus. The Inspectorate agrees that limited staffing is not likely to lead to LSE during operation and is content to scope this matter out.
3.11.2	Table 16-11 and paras 16.4.10 and 16.5.5	Gross Value Added (GVA) generation - Operation	The Scoping Report seeks to scope this matter out on the basis that there are likely low levels of operational employment, and as such, GVA generation would be minimal during operation and is therefore not likely to be significant. The Inspectorate is content with this justification and agrees to scope out this matter.
3.11.3	Table 16-11 and para 16.5.5	Provision of training, skills development and apprenticeship opportunities - Operation	The Scoping Report states that the proposed development is likely to generate beneficial effects in terms of training and apprenticeship provision, but that these are expected to be limited in scale and not likely to be significant. The Inspectorate is content with this justification and agrees to scope out this matter.
3.11.4	Table 16-11 and	Socio-economic effects on local and	The Scoping Report states that effects on amenity are expected to be minimal and spatially limited, reflecting the low likelihood of significant effects in relation to factors such

	para 16.5.6	private assets (including residential properties, local businesses, community facilities, open space/ recreation and visitor attractions) - Operation	as noise, townscape and visual character, and air quality. Scoping Report paragraph 16.5.6 states that the proposed development will not generate substantial operational traffic, emissions, or built form changes, and is expected to require only a small workforce, largely drawn from the existing Riverside Campus. Paragraph 16.5.4 states that the proposed development is entirely located within an urban area. The Inspectorate notes limited works required during operation and the mitigation measures noted in Scoping Report paragraph 16.7.3 to reduce any effects. On this basis, the Inspectorate agrees to scope this matter out, however, the ES should clearly demonstrate which mitigation will be relied upon to rule out significant effects and secure these measures within the DCO.
3.11.5	Table 16-11 and para 16.5.7	Socio-economic effects arising from land-use change on planned and proposed development - Operation	The Scoping Report states that significant effects arising from land-use change on planned developments and the proposed development are unlikely during operation, as maintenance activities are likely to be minimal and no land take is expected. Therefore, effects are not likely to be significant. The Inspectorate is content with this and agrees to scope this matter out of further assessment.
3.11.6	Table 16-11 and para 16.5.7	Changes to Public Rights of Way (PRoW) and recreational routes - Operation	The Scoping Report states that potential effects of closures or diversions of PRoWs would be considered during the construction phase and would not be considered further as part of the operational assessment. Furthermore, it is stated that any effects on PRoW arising from maintenance activities would be minimal and not likely to be significant. The Inspectorate is content with this justification and agrees with scoping out of this matter.
3.11.7	Table 16-11 and para 16.5.6	Effects on visitor accommodation including displacement of visitors - Operation	The Scoping Report states that the operation of the proposed development is not likely to require a large workforce, and therefore any effects on accommodation facilities, are likely to be minimal. The Inspectorate notes the expected number of workers set out in Scoping Report paragraph 16.5.5 and agrees that this is not likely to lead to significant effects, noting the location of the proposed development. On this basis, the Inspectorate is content with this justification and agrees to scope this matter out.

3.11.8	Table 16-11 and para 16.5.6	Effects on residential accommodation - Construction and Operation	The Scoping Report states that during construction, the workforce would be largely drawn from the London Travel to Work Area (TTWA), and any non-local workers are expected to be temporary and to primarily use visitor accommodation (e.g. hotels), rather than the housing market. The Scoping Report concludes any additional demand would be limited, short-term and dispersed, with no material effect on housing availability or affordability. Based on the expected number of workers noted in Scoping Report paragraph 16.5.5, the Inspectorate is in agreement that any additional demand would be limited and short-term and hence this matter can be scoped out.
3.11.9	Table 16-11 and para 16.5.10	All impact pathways during the decommissioning phase	The Scoping Report proposes to scope out an assessment of the decommissioning phase, as decommissioning is not currently proposed. In the event that the proposed development is decommissioned, this would result in a limited scale of works to remove above ground infrastructure and underground pipeline are expected to be left in-situ to minimise adverse environmental effects. On this basis, the Inspectorate agrees that the decommissioning phase can be scoped out of further assessment. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.11.10	N/A	Crime, safety and security	No reference is made to crime, safety and security in the Scoping Report. The ES should set out whether the characteristics of the proposed development are likely to have any significant effects on crime, safety and security on areas within which it is located or for people using those areas. It is noted that there are several higher than usual security areas through which the proposed development will pass. The ES should assess the impact of this or provide justification if it is proposed to scope this matter out. The ES should explain how any required security measures are secured within the dDCO and, where possible, demonstrate agreement with relevant statutory bodies and operators of those security areas.

3.12 Townscape and Visual

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Table 17-8 and para 17.5.9	Townscape Character – Below ground construction works - construction	The Scoping Report seeks to scope out this matter on the basis that below ground construction works are not likely to significantly alter the Townscape Character Areas (TCA) during the construction period. The Inspectorate notes that above ground construction works are scoped in. The Inspectorate is content to scope below ground works out of further assessment for this aspect.
3.12.2	Table 17-8 and paras 17.5.8, 17.5.11, and 17.5.15	Townscape Character and Visual Amenity - Above ground operational infrastructure - MAP ground level coverings, kiosks, consideration of operational lighting, and designated views	The Scoping Report states that these matters are scoped out as above ground infrastructure is limited in scale and footprint and considering the existing urban context of the locations (i.e. significant effects not expected on a townscape character within the urban environment of London with regard to ground coverings and kiosks). The applicant's attention however is drawn to the consultation response from the London Borough of Bexley at appendix 2 of this Opinion which has raised some concerns. Noting this, the Inspectorate is not currently able to scope this matter out. The applicant is requested to discuss this matter further with relevant statutory bodies and seek agreement. Evidence of such agreements should be provided in the ES to justify the scoping out of this matter.
3.12.3	Table 17-8 and para 17.5.9	Townscape Character - Below ground components of the proposed development - operation	The Scoping Report seeks to scope this matter out on the basis that below ground infrastructure is not likely to significantly alter the townscape character during operation. The Inspectorate is content to scope this matter out.

3.12.4	Table 17-8 and para 17.5.12	Visual Amenity – Below ground construction works - construction	The Scoping Report seeks to scope this matter out on the basis that below ground construction works would not be visible to receptors. The Inspectorate is content to scope this matter out.
3.12.5	Table 17-8 and para 17.5.12	Visual Amenity - Below ground components of the proposed development-operation	The Scoping Report seeks to scope this matter out on the basis that below ground works would not be visible to receptors during operation. The Inspectorate is content to scope this matter out.
3.12.6	Table 17-8 and para 17.5.16	All Townscape Character and Visual Amenity effects - decommissioning	The Scoping Report sets out that decommissioning is not expected for the proposed development and therefore, this matter is to be scoped out. In the event that the proposed development is decommissioned, this would result in a limited scale of works to remove above ground infrastructure and underground pipeline are expected to be left in-situ to minimise adverse environmental effects. The Inspectorate agrees that effects from decommissioning can be scoped out from further assessment. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.12.7	Paras 17.2.1 – 17.2.4	Study area and Zone of Theoretical Visibility (ZTV)	Study areas related to the key elements of the proposed development are set out in Scoping Report paragraphs 17.2.1 – 17.2.4 and it is explained that the study areas are justified through review of the maximum parameters of the proposed development, desk-based research, knowledge of the area, and professional judgement. However, it is unclear why a 500m is identified initially and then an additional 2km from the proposed development's infrastructure at the Riverside Campus is included. Furthermore, the Scoping Report states that further ZTVs will be produced to support the ES. The ES should provide a statement justifying the selection of the study area with reference to the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3), clearly setting out how the study area was defined and how it represents the maximum extent of likely significant effects. The selection of study areas should be discussed and,

			where possible, agreed with relevant statutory bodies. The ES should also identify any high sensitivity receptors beyond the final study areas that would have visibility of the proposed development and provide an assessment where significant effects are likely to occur. This should include consideration of visibility of external lighting at night-time.
3.12.8	Figure 17-1	Topography figures	It is unclear on Figure 17-1 as to what the colours signify. The ES should clarify this.
3.12.9	Figure 17.4 and para 17.4.5	Designated views (as part of London View Management Framework)	Figure 17.4 displays 27 viewpoints, however, Scoping Report paragraph 17.4.5 (volume 1) lists 23 designated views, meaning it would appear that viewpoints 24-27 are missing. The ES should be consistent and provide all relevant designated views in the figure and list. A legend should be provided to note what the numbers mean in the figures or provide a reference to the list of views in the main report of the ES.
3.12.10	Para 17.6.2	Defining the TCA through relevant documentation/ guidance	The applicant's attention is drawn to the consultation response from London Borough of Bexley at appendix 2 of this Opinion with regard to the selection of relevant documentation to define the TCA.

3.13 Transport

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 18-21 and para 18.5.6	Impact of the operational phase of the proposed development	The Inspectorate agrees that trips associated with the operational phase are likely to be limited and therefore is content to scope this matter out. The ES should however include estimates of trips required to justify this matter being scoped out.
3.13.2	Table 18-21 and para 18.5.7	Impact of the decommissioning phase of the proposed development	The Scoping Report sets out that the proposed development is not intended to be decommissioned, and should it be decommissioned, works would be required to the above ground infrastructure only. As such, effects are unlikely to result in significant effects. The Inspectorate is content to scope this matter out at this stage however the applicant should consider a commitment to a decommissioning plan to ensure good practice measures and mitigation are secured to ensure no significant effects. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.13.3	Para 18.4.26	Walking routes	The ES should clearly set out how the transport assessment has considered impact on walking routes within London boroughs where PRowS are not identified. TfL in its consultation response (see appendix 2 of this Opinion) also requested further consideration on impacts on journey times which include a station or underground line in the transport assessment.
3.13.4	Para 18.4.54	Bus stops	The ES should seek agreement from TfL for the use of 640m for the study area of bus stops and 960m used for railway stations to ensure its applicability for the assessment.

3.13.5	Para 18.6.6	Consistency in phrasing	The list of impacts to be assessed are phrased differently from those listed in the ISEP: Environmental Assessment of Traffic and Movement. Consistency in phrasing assists in understanding assessments and ensures all matters are covered.
3.13.6	N/A	Transport for London (TfL)	The applicant is encouraged to, where possible, agree the scope of the assessment and baseline information with TfL.
3.13.7	Para 18.6.10	Transport Assessment	The Scoping Report notes that a transport assessment will be prepared as part of the DCO application. The applicant is encouraged to append this to the ES if it is to contain information which is to be drawn up in the EIA, such as baseline information.

3.14 Water Environment and Flood Risk

(Scoping Report Section 19 and Appendix 19-1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Paras 19.5.11 and 19.5.12 and Table 19-8	Impacts on surface and ground water quality from increased thermal conditions (pipeline network and thermal stores) - Operation	The Scoping Report states that effects from changes to thermal conditions are unlikely due to the anticipated installation depth of the pipeline, and the use of insulation to prevent thermal losses. The Inspectorate agrees that thermal effects can be scoped out from further assessment during operation.
3.14.2	Table 19-8	Impacts on Groundwater Dependent Terrestrial Ecosystems (GWDTEs) – Construction and operation	The Scoping Report states that significant effects to GWDTEs are unlikely as there are no GWDTE within the 1km study area, and effects beyond this distance are unlikely. The Inspectorate agrees that significant effects on GWDTEs can be scoped out from further assessment.
3.14.3	Para 19.5.6 and Table 19-8	Surface water quality and hydro-morphology (Thames Water Framework Directive (WFD) water body only) –	The Scoping Report states that the proposed development would result in limited impacts to the Thames WFD waterbody due to the anticipated pipeline installation depth and dilution capacity of the waterbody. The Inspectorate agrees that significant effects on the Thames WFD waterbody can be scoped out from further assessment within the ES. Whilst WFD matters are outside the remit of comments provided by the Planning Inspectorate within this Opinion, the applicant should seek to agree the scope of waterbodies included within the accompanying WFD assessment with the relevant statutory bodies.

		Construction and operation	
3.14.4	Table 19-8	Surface water impact to watercourses downstream of 500m Study Area – Construction and operation	The Scoping Report states that the proposed development would result in limited impacts to waterbodies downstream of the 500m study area due to the dilution capacity of the waterbodies. The Inspectorate also notes that maintenance activities during the operation phase will be managed through an OEMP. The Inspectorate agrees that waterbodies further than 500m downstream can be scoped out.
3.14.5	Para 19.5.11 and Table 19-8	Thermal Pollution to surface water (pipeline network and thermal stores) - Operation	The Scoping Report states that significant effects from changes to thermal conditions are unlikely due to the anticipated installation depth of the pipeline, and the use of insulation to prevent thermal losses. The Inspectorate agrees that thermal pollution can be scoped out from further assessment during operation.
3.14.6	Paras 19.5.4 and 19.5.9 and Table 19-8	Foul drainage – Construction and operation	The Scoping Report states that, subject to ongoing review, no new sewer network connections are currently proposed, as foul wastewater would be stored in a self-contained foul drainage system for off-site disposal and there would therefore be no new discharges of treated foul water during construction or operation. The Inspectorate agrees that effects as a result of foul drainage can be scoped out provided that the proposed development utilises the self-contained system. In the event that the design is changed and discharges are required, the applicant should seek to agree the scope of this assessment with the relevant statutory bodies.
3.14.7	Para 19.5.10 and Table 19-8	Water resources (supply) - operation	The Scoping Report states that water supply during operation is proposed to be scoped out as water will come from existing agreements, however, the Scoping Report then states that this will be scoped in due to potential impacts (paragraph 19.5.10). For clarity, the Inspectorate considers that effects on water supply and water volume should be scoped in for the operation (as well as construction) phase, as the reasons given in 19.5.10 are the same as those stated as the reasons to scope in the construction phase.

3.14.8	Table 19-8	Water resources/ water supply (potable water only) – Construction and operation	The Scoping Report states that effects to potable water resources are unlikely as it is currently assumed that potable water will come from a mains supply (i.e. no new abstraction), and that this is managed by the local water company and is a regulated industry. Provided the ES can confirm this, the Inspectorate agrees that effects as a result of an increase in potable water abstraction can be scoped out.
3.14.9	Table 19-8	Nutrient Neutrality – Construction and operation	The Scoping Report states that there are no nutrient neutrality restrictions within the 1km study area, and therefore effects are unlikely. The Inspectorate agrees that significant effects to catchments subject to nutrient neutrality can be scoped out from further assessment.
3.14.10	Para 19.5.15 and Table 19-8	All effects during decommissioning	The Scoping Report states that effects during decommissioning are unlikely as there will be no underground work at the decommissioning stage if it is undertaken, and minimal above groundwork which would be managed through good practice pollution prevention measures. The Inspectorate agrees that effects from decommissioning can be scoped out from further assessment. See ID 2.1.2.

ID	Ref	Description	Inspectorate's comments
3.14.11	Scoping Report Chapters 9 and 19	Clarity of scope between ground conditions and water environment scoping chapters	The Scoping Report includes groundwater and surface water receptors within chapter 9: ground conditions and chapter 19: Water Environment and Flood Risk. The Inspectorate considers that it is unclear which effects are proposed to be assessed within each chapter, as there are number of conflicting statements: • Scoping Report paragraph 9.1.2 states that chapter 9: ground conditions would assess effects from (existing) land contamination, however mobilisation of contaminated sediments where already present elsewhere would be assessed in chapter 19: Water Environment and Flood Risk. • Scoping Report paragraph 19.5.2 subsequently states that the effects of any pollution introduced by the proposed development would be assessed in chapter 19: Water Environment and Flood Risk, however paragraph 19.5.8 refers to water quality in

			general rather than solely the introduction of pollution. Scoping Report table 9-10 states that pollution introduced from drilling would be assessed as part of the ground conditions assessment in chapter 9: ground conditions. Scoping Report Table 9-10 also refers to changes to flow pathways and hydrological and hydrogeological settings which are predominately referred to as being assessed within chapter 19: Water Environment and Flood Risk as specified by paragraph 9.1.2. The ES should ensure to clearly specify which effects on water resources are assessed within each aspect chapter. On the basis that chapter 19: Water Environment and Flood Risk of the Scoping Report identifies a requirement to scope in operational effects to water resources, this is also considered to apply to the effects to water resources detailed within chapter 9: ground conditions.
3.14.12	N/A	Provision of a WFD screening document	The Scoping Report refers throughout chapter 19 to a WFD Screening and Scoping Assessment which has been provided to the Environment Agency but has not been included within the Scoping Report. Whilst WFD matters are outside the remit of comments provided by the Planning Inspectorate within this Opinion, the ES should ensure that any additional consultation or assessment documents referred to in the ES are provided in full. The applicant should also consider whether any other relevant parties may wish to comment on the WFD screening document.
3.14.13	Para 19.7.6	Hydrostatic testing	The Scoping Report states there is a potential for hydrostatic testing, which is not described elsewhere in the Scoping Report. The ES should ensure to provide a description of all proposed works and assess any relevant effects. In relation to hydrostatic testing, the ES should also confirm whether this is assessed under the construction or operational phases.
3.14.14	Para 19.7.7b	Location of Source Protection Zone (SPZ) 1 and 2	The Scoping Report references Environment Agency guidance which states that pipelines within SPZ1 or 2 are normally objected to unless unavoidable. The ES should detail why it has not been possible to avoid these SPZs (as detailed in Scoping Report Appendix 19-1),

		within the order limits	and what the proposed Best Available Techniques for mitigation measures are proposed to comprise. These measures should be detailed in the ES and secured through the dDCO. The applicant's attention is also drawn to the Environment Agency response in appendix 2 of this Opinion in relation to the presence of the Drinking Water Safeguard Zone (Battersea).
3.14.15	Para 19.7.7c	Provision of a Hydrogeological Risk Assessment	The Scoping Report references Environment Agency guidance which states that a Hydrogeological Risk Assessment may be required. The ES should confirm whether this is to be provided to inform the ES, as it does not appear to be specifically listed in the additional assessments listed in Scoping Report section 19.6. If this is not provided, the ES should confirm how it is secured in the dDCO if required to inform avoidance and mitigation measures, and how any data gaps as a result have been identified and considered.
3.14.16	Para 19.7.8g	Permanent access watercourse crossings	The Scoping Report refers to the use of clear span structures for permanent watercourse crossings. The requirement for water crossings above the ground surface does not appear to be referenced in the description of the proposed development, and it is not clear to the Inspectorate why these would be required for an underground pipeline. The ES should ensure to provide a clear description of the proposed development and assess all relevant effects.
3.14.17	Para 19.8.1e	Provision of baseline water groundwater level and quality data	The Scoping Report states that groundwater level and quality data for the study area is limited. If the ES identifies this as a limitation, a justification for this should be provided, as publicly available borehole records show a significant number of boreholes in the area. Data from a number of Town and County Planning Act and Nationally Significant Infrastructure Project applications are also likely to be publicly available which have been located in or near the study area.

3.15 Cumulative effects

(Scoping Report Section 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.15.2	Paras 20.2.6 – 20.2.7	Intra-Project Effects - Study Area Definition	It is noted that the proposed study area is defined by including areas where two (or more) effects may combine or interact on a receptor. The extent of the study area is informed by the spatial extent of individual effects. The Inspectorate would expect the study area to also take into account additional areas identified as a result of road closures and diversions. The study area will need to be shown on a plan submitted with the ES, showing receptors locations and an explanation of how the spatial extent has been derived.
3.15.3	Para 20.2	Intra-Project Effects	The assessment of effects in the ES will need to consider the scenario where there could be two or more areas of construction in close proximity, with the potential to create emissions/ effects from two or more areas merging on one or more receptors resulting in greater impact. For example, the central area of Scoping Report Figure 6-1, sheet 5. The assessment should also consider effects on additional areas identified as a result of road closures and diversions.
3.15.4	Para 20.3	Inter-Project Effects – Study Area	The other developments identified in the Long List and Short List should be identified and marked on a plan submitted with the ES. The Scoping Report refers to a Zone of Influence (ZoI) for the environmental aspect area but does not appear to define a study area. A study area should be defined in the ES with a plan showing the areas assessed and should also take into account additional areas identified as a result of road closures and diversions. The assessment of effects in the ES will also need to consider the scenario where there

			could be two or more areas of construction in proximity, with the potential to create emissions from two or more areas merging resulting in greater impact. For example, the central area of Figure 6-1, sheet 5. The assessment should also consider effects on additional areas identified as a result of road closures and diversions.
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APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council(s)	Swanley Town Council
	Queens Park Community Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	South East and London
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - Thames and East England Region
The Canal and River Trust	The Canal and River Trust
Trinity House	Trinity House
The relevant Highways Authority(s)	Lambeth Council
	Southwark Council
	Lewisham Council
	Royal Borough of Greenwich Council
	London Borough of Bexley Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Royal Borough of Kensington & Chelsea Council
	Westminster City Council
	Tower Hamlets Council
	London Borough of Barking and Dagenham Council
	City of London Corporation
	National Highways
Transport for London	Transport for London
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Mayor's Office for Policing and Crime (MOPAC)
The relevant ambulance service	London Ambulance Service
The relevant fire and rescue authority	London Fire Commissioner
	London Fire Brigade
The relevant Integrated Care Board	NHS South West London Integrated Care Board
	NHS West and North London Integrated Care Board
	NHS North East London Integrated Care Board
	NHS South East London Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	London Ambulance Service - Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Schoen Hospital London - Essex Partnership University NHS Foundation Trust
	The Gordon Hospital - Central and North West London NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	High Speed 1 Ltd
	Network Rail (High Speed) Ltd
	National Highways Historical Railways Estate
	London and Continental Railways Ltd
Light Railway and tramway	Docklands Light Railway
Road Transport	Transport for London

STATUTORY UNDERTAKER	ORGANISATION
Canal or Inland Navigation Authorities	The Canal and River Trust
Dock and Harbour authority	Port of London Authority
Lighthouse	Trinity House
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Thames Water
	Thames Water Commercial Services
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Crossness - Lightsource BP
	Cory Decarbonisation Project - Cory Environmental Holdings Limited (CEHL)
	Barking Power Station - Barking Power Ltd
The relevant electricity distributor with CPO Powers	Eastern Power Networks Plc
	London Power Networks Plc
	South Eastern Power Networks Plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY	
Dartford Borough Council	
Sevenoaks District Council	
London Borough Of Havering Council	
Brent London Borough Council	
London Borough Of Redbridge Council	
Wandsworth Borough Council	
London Borough of Hammersmith and Fulham Council	
Camden Council	
Islington Council	
London Borough of Hackney Council	
London Borough of Newham Council	
Croydon Council	
London Borough of Bromley Council	
Merton Council	
Thurrock Council	
Kent County Council	
Lambeth Council	
Southwark Council	
Lewisham Council	
Royal Borough of Greenwich Council	
London Borough of Bexley Council	
Royal Borough of Kensington and Chelsea Council	
Westminster City Council	
Tower Hamlets Council	

LOCAL AUTHORITY	
London Borough of Barking and Dagenham Council	
City of London Corporation	

TABLE A4: THE GREATER LONDON AUTHORITY

The EIA Regulations and section 42(1)(a) of the PA2008 requires consultation with the Greater London Authority (GLA) if the land is in Greater London.

ORGANISATION
The Greater London Authority

TABLE A5: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation

TABLE A6: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
City of London Police Authority Board
Royal National Lifeboat Institution
Lister Hospital (HCA Healthcare UK)
No 9 Harley Street - Phoenix Hospital Group
The Security Service (MI5)
The Secret Intelligence Service (MI6)
Foreign, Commonwealth and Development Office
UK Parliament (Estates Team)
Royal Parks
Cabinet Office (Government Security Group)
The Bank of England

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Canal and River Trust
City of Westminster Council
Environment Agency
Forestry Commission
Health and Safety Executive
Historic England
London Borough of Bexley
London Borough of Bromley
Maritime and Coastguard Agency
National Grid Electricity Transmission
National Highways
Natural England
Northern Gas Networks
Port of London Authority
Queens Park Community Council
Royal London Borough of Greenwich
Royal Mail
Sphere Connections
St Pancras High Speed One
Swanley Town Council
The Marine Management Organisation
Thurrock Council

Transport for London
Trinity House
United Kingdom Health Security Agency

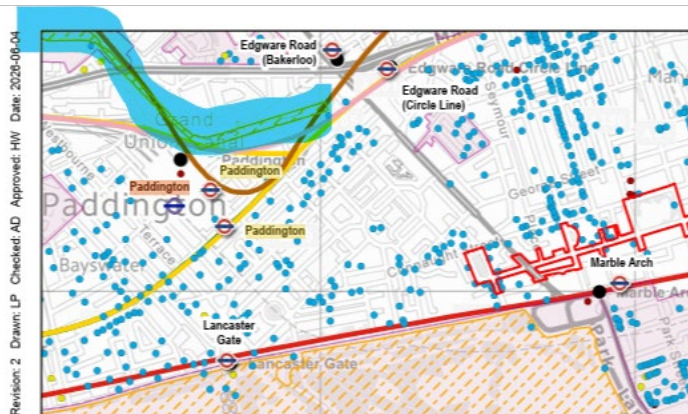
From: [REDACTED]
Sent: Wednesday, August 05, 2026 13:53
To: London Strategic Heat Main
Subject: Fw: RE: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Mr Chapman,

Thank you for this recent consultation.

Having reviewed the details, I note that the closest points to our network would be Transmission Branch – Paddington.



I can therefore confirm that these are far enough away from the Canal & River Trust assets (Paddington Basin – highlighted in blue in the above extract) to not have an impact, and we have no comments to make.

For information, please see link to the Trust's network maps:

<https://canalrivertrust.org.uk/enjoy-the-waterways/canal-and-river-network>

Please feel free to contact me if you have any further queries.

Kind regards,

[REDACTED]

Area Planner – London

M [REDACTED]

E [REDACTED]@canalrivertrust.org.uk

Please note that I do not work on Fridays



Leave a gift in your Will and be remembered | [Canal & River Trust](#)

Pass on your love of canals for future generations through a gift in your Will, and keep the magic alive for years to come.

From: London Strategic Heat Main

<LondonStrategicHeatMain@planninginspectorate.gov.uk>

Sent: 07 July 2026 10:57

To: National Planning Function <planning@canalrivertrust.org.uk>

Cc: [REDACTED]@canalrivertrust.org.uk>

Subject: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

You don't often get email from londonstrategicheatmain@planninginspectorate.gov.uk. [Learn why this is important](#)

FAO [REDACTED]



Scan me or click
[here](#) to view the
application
documents

Case Officer:
Phone:
Website:

www.westminster.gov.uk/planning

Environmental Services
Infrastructure Decisions And Applications Service
Planning Inspectorate
C/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

4 August 2026

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE			
Application No:	26/04683/OBS		
Date Received:	07.07.2026	Date Amended:	07.07.2026
Plan Nos:	Scoping Report		
Address:	Various Locations Across London, , ,		
Proposal:	Proposed application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development)		

Yours faithfully,

Director of Town Planning & Building Control

Planning Inspectorate
Click or tap here to enter text.

Reference: OR-0007669/01
Customer reference: EN0710009

4 August 2026

**EIA Scoping consultation
London Strategic Heat Main**

Dear Planning Inspectorate

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by Cory (the Applicant) for an Order granting Development Consent (DCO) for the London Strategic Heat Main. This consultation was received on 07 July 2026.

We have reviewed the main text, accompanying figures and appendices, and can provide the following advice in relation to matters within our remit.

We must take issue with the scope of the Environmental Impact Assessment (EIA) as currently defined and would recommend further issues are scoped in to meet the requirements of the EIA regulations. These are as follows:

- Groundwater and contaminated land:
 - Operational impacts should be scoped in to assess longer-term risks to groundwater, including mobilisation of contamination.
 - Heat impacts should be scoped in, as heat is a groundwater pollutant and may affect controlled waters.
 - Geological receptors should be fully identified to sufficiently assess risks to controlled waters.
- Fisheries
 - Impacts to fish are scoped out, however, if Unexploded Ordnance (UXO) clearance takes place in the River Thames or any main rivers, it should be scoped in.

- Marine and surface water quality
 - Construction-phase impacts on water quality and aquatic receptors in the River Thames and marine environment are scoped out. This should be scoped in, as there's currently insufficient detail on mitigation measures, and activities such as drilling fluid breakout, sediment disturbance, spills, and runoff.

Please note this review is on the EIA process only. Other assessments required such as Flood Risk Assessment (FRA), Habit Regulations Assessment (HRA) and Water Framework Directive (WFD) have not been included. We would recommend the Applicant consult us on the scopes of these studies in due course.

The structure of our response is as follows:

- Appendix A - Detailed Comments on the EIA Scope
- Appendix B - Additional advice to the Applicant
- Appendix C - Informatives

We have provided our commentary on issues that have been scoped in or scoped out for assessment under Appendix A. Under Appendix B, we have sought to identify key issues early and provide proactive advice on the mitigation measures and commitments we would expect to see later in the process. We recognise that the level of detail available at this stage is limited.

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

If you have any questions regarding our response, please contact
NIteam@environment-agency.gov.uk.

Yours sincerely,



National Contact Centre: 03708 506 506
NIteam@environment-agency.gov.uk
2 Marsham Street, London, SW1P 4DF

APPENDIX A – Comments on the EIA Scope

Groundwater and Contaminated land

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 9.5.3, Chapter 19.5.7, Chapter 19.5.12	
Issue	Operational Phase impacts have been scoped out.
Impact	Longer term impacts to groundwater and risks mobilisation of existing contamination may not be mitigated and therefore damage to controlled waters may occur.
Solution	Operational Phase impacts should be scoped in.
Additional narrative: The Applicant is proposing for the project to be permanent and therefore should expect groundworks to repair, restore or upgrade assets. These works would be during the operational stage of the project. These works may mobilise contamination not affected by the construction due to changed conditions. There may also be impacts on the ground conditions due to the operation of the assets such as: • heat impacts; • pollutive impacts related to any back-up generators or pumps; • water leakage from the heat main.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 19.5.12	
Issue	Impacts to groundwater bodies from increased thermal conditions has been scoped out.
Impact	Mitigations to prevent damage to controlled waters may not be put into place, and therefore a deterioration in water quality may occur.
Solution	Thermal impacts to be scoped in.
Additional narrative: Following the 2023 amendments to the Environmental Permitting Regulations 2016 heat is now a groundwater pollutant. Discharge of heat to water should be a material consideration for developments involving emissions of heat e.g., buried	

electrical cables, particularly NSIPs or large-scale infrastructure developments. To date heat input to ground has been considered lower risk to groundwater, on the understanding it readily disperses in the surface layers and air and in general does not have any widespread adverse impacts on the ground and groundwater. However, in very sensitive locations, we may want to regulate higher risk activities to prevent further increase/ deterioration of the groundwater quality. The Environment Agency is currently developing guidance about heat as a pollutant to groundwater.

While no direct guidance has been produced for this proposed activity, the Environment Agency's Chief Scientist's Group published report for [Environmental impacts of temperature changes from ground source heating and cooling systems - GOV.UK](#), provides guidance on what receptors and impacts heating of groundwater may involve and as such provides a valuable equivalent assessment framework for thermal effects.

Projects should ensure where possible:

- no discharge of pollutants to the environment;
- they do not cause pollution of surface water or groundwater;
- they do not locate within a groundwater source protection zone 1 (SPZ1) that's used to supply water for domestic or food production purposes;
- they are not within 50m of a well, spring or borehole used to supply water for domestic or food production purposes;
- installation does not mobilise any contaminants present in the subsurface to the extent that the pollution of groundwater occurs;
- they are not adjacent to a septic tank or cesspit, including the infiltration system.

Desk based assessments at the planning stage should scope in heat. The GSHC exemption criteria and resources could help assess the risk. For example: either by de-risking, if all criteria are met or further assess the risk, where the criteria are not met and mitigate the risk, where required.

The Desk based assessment should include at minimum:

- Numerical assessment of the level of insulation;
- Impacts from any liquid leakage from the heat main;

- Impacts on both groundwater and hydrologically connected receptors where groundwater may act as a pathway;
- Cumulative impacts of the existing and proposed existing heat creating infrastructure both permitted and unpermitted within the scope of impacts. The Environment Agency is aware of thermal piles, open and closed loop ground source heat pumps, and cabling.

Marine and surface water quality

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 13: Marine Environment	
Issue	Construction-phase impacts on water quality within the River Thames and marine environment have been scoped out. This includes: • Changes in water quality/release of contaminants (construction phase); • Impact on water quality (chemical/temperature/salinity) due to direct abstraction or discharges from the River Thames (construction phase); • Impacts to fish.
Impact	Construction activities could cause deterioration in water quality within the River Thames and marine environment. Potential pathways include drilling fluid breakout from Horizontal Directional Drilling (HDD), remobilisation of contaminated sediments, chemical or oil spills and surface water runoff. These impacts could adversely affect aquatic receptors, including fish.
Solution	The following impacts within the River Thames should be scoped in: • Changes in water quality/release of contaminants (construction phase); • Impact on water quality (chemical/temperature/salinity) due to direct abstraction or discharges from the River Thames; (construction phase and operation); • Impacts to fish and shellfish (construction).
Additional narrative: Scoping out these impacts relies on mitigation measures that have not yet been fully defined within a Framework Construction Environmental Management Plan (CEMP). As such, there is insufficient information to conclude that impacts from surface water	

runoff, sediment mobilisation, chemical spills, direct abstractions or temporary discharges can be adequately mitigated. Scoping out these impacts on the basis of mitigation measures that have not yet been developed or approved is therefore not appropriate. We acknowledge that the River Thames already has high turbidity, and dilution, but these impacts should still be assessed to prove there is no negative impact.

Construction-phase water quality assessments should consider including impacts arising from trenchless crossing techniques, contaminant release, and sediment disturbance. The assessment should demonstrate that any proposed mitigation measures will be effective and should consider impacts on fish and other marine receptors where relevant.

We expect an assessment of the risk of drilling fluid breakout associated with trenchless crossing techniques, together with the risk of disturbing contaminated sediments and the effectiveness of proposed mitigation measures. Although it is anticipated that river crossings will typically be between 20m and 30m below the riverbed, the scoping report identifies a crossing depth of at least 5m below the River Thames. At shallower depths, there remains potential for drilling fluid breakout to affect water quality and fish.

We are content for construction and operation impacts from temperature change on surface water bodies to be scoped out.

Fisheries

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 9, Ground Conditions, paragraph 9.4.28	
Issue	Impacts to fish (and shellfish) are scoped out of assessment. The management of UXO's in the River Thames is unclear.
Impact	Certain techniques could be very noisy and as a result impact fish's behaviour, and in extreme circumstances cause mortality.
Solution	If UXO's are proposed to be controlled within the River Thames, then fish must be scoped into the assessment and a full assessment of the noise impacts on fish must be completed.
Additional narrative:	

The Marine Management Organisation (MMO) regulates marine licensing for English waters. UXO clearance is a licensable marine activity under Part 4 of the Marine and Coastal Access Act 2009.

The Environment Agency do not review UXO clearance reports, however we are concerned that impacts to fish may not be assessed if not scoped in for assessment.

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 9, Ground Conditions.

Issue	Impacts to fish (and shellfish) are scoped out of assessment, however ground investigation works in the main rivers may involve piling.
Impact	Piling and can impact fish through noise, affecting their behaviour, and in extreme circumstances, causing mortality.
Solution	Provide clarity as to whether ground investigations, or any piling will take place in main rivers. If this activity does take places, then fish must be scoped into the assessment.

Additional narrative:

In correspondence with the Applicant (dated 28 July 2026), it was stated there's currently no intention to undertake ground investigations in the River Thames. However, we could not confirm whether ground investigation works would take place in other main rivers.

APPENDIX B - Additional advice to the Applicant

Groundwater and contaminated land

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report	
Issue	Cooling is mentioned as a possibility, but no further details of methods or impacts are provided
Impact	Risks to controlled waters cannot be assessed
Solution	Provide further details on the methodologies the project may choose to employ to achieve cooling

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 9.4, Chapter 19.4	
Issue	Insufficient identification of geological receptors.
Impact	Damaging effects to controlled waters may not be identified and therefore cause a deterioration in water quality.
Solution	The Environmental Statement (ES) should include aquifers present at depth underneath the project.
Additional narrative: Geology in the area is three dimensional and the scoping report has taken a 2-dimensional stance. For example, where the London Clay confines and overlies the Lambeth Group, Thanet Formation or Seaford Chalk. The project may introduce pollutants, allow or increase mobilisation of existing contamination, or create preferential pathways between aquifers with currently limited connection. The ES and other assessments should consider where multiple aquifers may overly each other including multiple groundwater bodies, or where aquifers are confined by unproductive layers.	

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 19.6.8

Issue	Only the Environment Agency has been listed as a source for Abstractions.
Impact	Deregulated Abstractions may not be identified as receptors.
Solution	The Applicant should engage with Local Authority Environmental Health departments to identify <20m ³ /day abstractions.

Additional narrative:

Abstractions taking less than 20m³ per day are not licenced by the Environment Agency but may be registered with their relevant Local Authority. As such the Applicant should engage with the Local Authority Environmental Health team (or equivalent) to identify any potential receptors. We note this has been referenced in London Strategic Heat Main, Environmental Impact Assessment Scoping Report, Volume 3: Appendices, Appendix 19-1: Water Environment and Flood Risk Baseline, Chapter 1.1.3, but should be referenced in the main body due to associated risks.

It should be noted that any groundwater abstraction used for human consumption, or food production, receives a default Source Protection Zone 1 of 50m, even if this is not published and under 20m³ per day.

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 2.5

Issue	Maximum depths have not yet been established for several features including the thermal store and any works requiring foundations.
Impact	Impacts into the geological and hydrogeological regimes cannot be fully established, thereby jeopardizing water quality.
Solution	Supply maximum expected depths for all features.

Additional narrative:

We recognise that detailed design information will not be present at this stage of the project. However, to be able to determine the extent of possible impacts, we

recommend the Applicant supplies maximum reasonably expected depths for all features interacting with the sub surface.

Deep foundation, piling and ground improvement methods may create preferential pathways or otherwise result in the mobilisation of contamination or alter groundwater flow paths if not adequately mitigated.

Piling and penetrative ground improvement methods should be designed in accordance with CL:AIRE guidance '[Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#)', published March 2025.

A Foundation Works Risk Assessment (FWRA) should be produced in areas of sensitive groundwater such as in Secondary A aquifers, source protection zones or where other receptors may be linked.

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 9.5.2, table 9-10

Issue	Horizontal Directional Drilling (HDD) or other trenchless installation may be employed.
Impact	HDD or other trenchless installation methods could impact groundwater or surface water quality if not suitably managed.
Solution	Trenchless installation methods should be supported by the development and implementation of a drilling fluid breakout plan and hydrogeological risk assessment.

Additional narrative:

Due to the risks both from pollution and disruption of sub surface flows in groundwater and to surface controlled waters, a hydrogeological risk assessment, drilling fluid breakout plan and water feature survey should be conducted for areas of the development where HDD or micro-tunnelling is proposed to be used.

We recommend that any lubricants or slurries utilised during these methods should also avoid the use of PFAS group chemicals.

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2, Chapter 9, Chapter 14, Chapter 19	
Issue	The development could require multiple permits or licences during the operational and construction phases
Impact	Feasibility of design may be impacted due to permit or licencing requirements
Solution	Early engagement with the Environment Agency to permitting or licencing requirements.
Additional narrative: Due to the complexities of the development multiple aspects of the design may be impacted by permitting requirements. To ensure a lack of delays we recommend the Applicant engage with the Environment Agency about aspects including: • Impoundment for thermal storage reservoir; • Abstraction for dewatering; • Discharge consents; • Groundwater activity permits including potentially for heat; • Abstraction for water supply (including modification for usage changes to existing abstractions); • Waste activities; • Contamination remediation activities. For further information please see Appendix C.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2, Chapter 19	
Issue	The project will require dewatering.
Impact	Risks to controlled water and existing infrastructure
Solution	Dewatering activities should receive a Hydrogeological Risk Assessment.
Additional narrative: There are unique challenges to dewatering with this proposed project. • The proposed routing will impact existing Thames Tideway Tunnel assets. The eastern section of these assets has restrictions to activities that could	

reduce the hydraulic containment of the tunnel lining and may impact leakage from the asset. As such The Thames Tideway should be consulted by the Applicant;

- Dewatering of the Lower London Tertiaries introduces air to the aquifer and promotes precipitation of metals. This is documented in the literature such as [Changes in groundwater chemistry due to rising groundwater levels in the London Basin between 1963 and 1994 - UEA Digital Repository](#);
- Areas of known historical contamination such as historical landfills, Royal Arsenal, and Transmission Branches Barking 1, 2 and 3. There may be further complications caused by dewatering in these areas due to the poor quality groundwater present.

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 19

Issue	Multiple hazardous and non-hazardous substances may be introduced to groundwater.
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Impact	Reduction of quality in controlled waters.
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Solution	Environment Agency to be consulted on assessments where substances could be foreseen to interact with groundwater.
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Additional narrative/ explanation (if necessary):

Multiple aspects of the project involve or could be reasonably foreseen to involve the introduction of hazardous and non-hazardous substances to groundwater. Non hazardous substances can still result in pollutive impacts to groundwater. This could damage WFD groundwater bodies and reduce groundwater quality. Of particular concern are:

- Potential of leaks from the heat main, resulting in additives utilised being lost to ground;
- Backup generators fuel stores;
- Hydraulic Fluid for drilling.

Assessments relating to activities should detail the proposed substances where possible alongside mitigations and protections to be utilised to protect groundwater, such as leak detection. We strongly recommend early engagement on these matters.

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 3: Appendices, Appendix 19-1, Chapter 1.1.29	
Issue	The report has not identified a drinking water groundwater safeguard zone.
Impact	Potential impacts to an important receptor will not be appropriately assessed.
Solution	Baseline data should be fully reassessed to ensure all sources and receptors are identified.
Additional narrative: The report incorrectly states no safeguard zones exist. We have identified that the Drinking Water Safeguard Zone Battersea is within the scope of potential impacts from the project.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 9 and Chapter 19	
Issue	Areas within the area of potential impacts from the project include areas of historical contamination
Impact	Mobilisation of existing contamination may impact controlled waters
Solution	Ensure all relevant assessments consider historic land uses.
Additional narrative: Baseline's undertaken for assessments and the environmental statement should consider contamination from historic land uses, not limited to historic and authorised landfills. Examples include the Royal Arsenal and Barking Riverside where former contaminative usages are of concern.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report	
Issue	Important legislation and guidance have not been noted.

Impact	Compliance with relevant laws may be missed and best available practice may not be used, increasing risks to controlled waters.
Solution	Refer to and follow all relevant guidance and legislation in further assessments and plans.
Additional narrative: The report either does not include or does not consistently include: • Part IIA, Environmental Protection Act 1990; • The Water Supply (Water Quality) (Amendment) Regulations 2018; • Groundwater (England and Wales) Regulations 2009; • A new perspective on Land and Soil in Environmental Impact Assessment, IEMA, February 2022; • Control of Pollution Act 1974.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2, Chapter 9 and Chapter 19	
Issue	Installation of ducting and joint bays for cabling, and any trench, or engineering medium of higher permeability than the surrounding soil or geology.
Impact	Introduction of preferential pathways for pollutants at all stages, which may cause a deterioration in groundwater quality.
Solution	Include these as pathways in future assessments.
Additional narrative: Preferential pathways can allow for the rapid and less predictable spread of any pollutants that reach them. This can lead to a higher risk of receptors at greater distances being affected, or of pollutants reaching receptors faster than would be expected. As such we believe all preferential pathways identified should be included in any assessments of risk and hazard. Design phase should assess methods such as Clay Stanks, other barriers, or methods to limit the migration of potential contaminants.	

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 9 and Chapter 19

Issue	Unexpected contamination may be encountered by the development without a protocol in-place to manage risks.
Impact	If a protocol for how to manage unexpected contamination, in accordance with Land Contamination Risk Management (LCRM) guidance is not proposed, risks to controlled waters may not be adequately assessed and mitigated.
Solution	Ensure that a commitment to managing unexpected contamination is included in the Framework CEMP and Framework Demolition Environmental Management Plan (DEMP).

Additional narrative:

We would welcome the opportunity to be consulted on the approach for managing unexpected contamination.

Our suggested process is:

1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency.
2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.
3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).

Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the

remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.

The CEMP, OEMP, and DEMP should include a discovery strategy and information on toolbox talks to be issued to groundworkers who may encounter unexpected contamination.

1. Informatives

Informative	<u>Lifespan of Infrastructure</u> The Applicant should ensure that all below ground infrastructure is suitable for the project to minimise the risk of further preventable disturbance.
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Informative	The Outline Operation Environmental Management Plan (oOEMP) and final OEMP should include details of the maintenance and repair procedures for all aspects of the development. This should include aspects, not limited to: • Regular inspection and maintenance of drainage features including emergency equipment. • Procedures for identifying any leaks. • Procedures for excavations in the event or replacement of equipment failure and repair, or necessary maintenance.
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Informative	<u>Waste on site</u> Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.
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	Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to: • CL:AIRE Definition of Waste: Code of Practice • EA Regulatory Position Statement 215: Treating small volumes of contaminated soil and groundwater
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Informative	<u>Waste to be taken off site</u> Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes: • Duty of Care Regulations 1991 • Hazardous Waste (England and Wales) Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2010 • The Waste (England and Wales) Regulations 2011 Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.
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	If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website for more information.
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Informative	<u>Sustainable drainage systems</u> The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should: • be suitably designed • meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance • use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply. See the Environment Agency's approach to groundwater protection, position statement G13: Groundwater protection position statements.
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Informative	We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface
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	water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.
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Marine, surface water quality and fisheries

Document Reference(s): Environmental Impact Assessment Scoping Report: Volume 1: Main Report, Chapter 2: Proposed Scheme, section 2.5.21 Volume 1, Chapter 13: Marine Environment, Table 13-3 Volume 1, Chapter 19: Water Environment and Flood Risk, section 19.5.6 and 19.7.3, and Table 19-8	
Issue	There is no definitive commitment to a drilling fluid breakout plan, or sufficient buffer distances for entry and exit pits.
Impact	Drilling fluids can reduce water quality and impact fish, if there is a breakout and it reaches surface waters.
Solution	The Applicant must commit to producing a drilling fluid breakout plan. Entry and exit pits must be at-least 10m away from top of the bank of watercourses.
Additional narrative/ explanation: We note that HDD may be used to cross beneath watercourses or existing buried utilities. However, the risk from breakout is not scoped in as a specific risk to water quality in Table 13-3 or 19-8. We note that section 19.7.3 states that a hydraulic fracture, or frac-out, risk assess is essential and should be clearly listed in the Commitments Register. We also recommend that the risk is addressed in Chapter 13, as a drilling fluid breakout could affect the Thames Middle transitional water body. At this stage, we have not	

seen sufficient mitigation detail to conclude that this risk would be adequately managed.

Bentonite pellets, which are used to make drilling fluid for HDD, can also be coated in PFAS. We strongly recommend that PFAS-free materials are used.

For Flood Risk Activity Permits (FRAPs), an offset of 16m from tidal defences and tidally-influenced watercourses is required. Please see Appendix C for more information. Whilst we support the 16m setback from flood defence assets referred to in paragraph 19.7.8(f) in relation to the operational phase, setback should also be sought for the construction phase where possible.

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 19: Water Environment and Flood Risk, section 19.3.7 and 19.7.4

Volume 3, Appendix 21-1: Commitments Register

Issue	Although there is commitment to a Framework CEMP, specific mitigation is not currently known so measures to protect against pollution are unclear.
Impact	There is a risk to deteriorating water quality if hazardous substances during construction get into surface runoff and is subsequently discharged.
Solution	The Framework CEMP should include commitments to avoid or mitigate potential impacts from sediment, concrete, wheel washing and any spills of hazardous substances.

Additional narrative/ explanation:

Government and best practice guidance is not listed in the Relevant Guidance section. The Applicant should be aware of [Pollution prevention for businesses - GOV.UK](#) and [Oil storage regulations for businesses - GOV.UK](#), as well as CIRIA The SuDS Manual (C753F) and CIRIA Containment systems for the prevention of pollution (C736). These should be listed in section 19.3.7.

A Framework CEMP should include:

- Buffer distances of at least 10m from watercourses from top of bank (we acknowledge this is listed in section 19.7.4);
- Refuelling to only take place on impermeable surfaces, and in bunded areas;

- Chemical, oil and fuel storage to be bunded, with impermeable base, volume sized for 110% and covered to protect from accumulation of rainwater;
- Parking areas and temporary construction compounds should use drip trays and oil interceptors, as well as surface runoff management (like silt socks or silt busters);
- Concrete/cement works should be minimised during heavy precipitation events and carried out during dry months. Pre-cast units could be used where possible;
- Collecting and removing any contaminated water from site (i.e. from wheel wash and concrete washout facilities), and not allowing this to be discharged to surface waters.

We note the CIRIA SuDS Manual is referenced in section 19.6.17, but it should be used consistently.

For FRAPs, an offset of 16m from tidal defences and tidally-influenced watercourses is required. Please see Appendix C for more information. Whilst we support the 16m setback from flood defence assets referred to in paragraph 19.7.8(f) in relation to the operational phase, setback should also be sought for the construction phase where possible.

Surface water quality

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 19: Water Environment and Flood Risk, section 19.6.2, 19.6.8 and 19.6.9 Volume 2: Figure 19-1 Surface Water Features and Their Attributes	
Issue	Whilst there will be “site walkover surveys”, further information is unknown on collecting baseline data pre-construction and monitoring is not listed as a commitment in the Commitments Register.
Impact	If water quality monitoring is not appropriate, then a suitable baseline of water quality data may not be captured. Furthermore, any trends in water quality deterioration or improvement as a result of the project, may not be understood.
Solution	A commitment to produce a water quality monitoring plan should be provided in the framework CEMP and be listed in the Commitments Register. It should include pre-construction, construction and post-

	construction phases. The frequency should occur at least monthly and the locations should be upstream and downstream of any water crossings or discharges.
Additional narrative/ explanation: We note that section 19.6.9 says “no water quality sampling is proposed to support the water environment assessment”. Whilst we agree that this is sufficient for the ES, visual observations, in-situ measurements with handheld equipment, and samples sent to a laboratory, will be required to establish a water quality baseline before construction commences. Our assessment of Figure 19-1 suggests that more upstream monitoring points, and better monitoring points upstream and downstream of watercourse crossings will be required.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2: Proposed Scheme, section 2.6.11	
Issue	There is no mention of engagement with the Environment Agency regarding the potential need for permits for discharges of construction site drainage.
Impact	If a proper assessment of discharge of construction site drainage is not done, discharge of silty/contaminated rainwater can cause a pollution incident. Not engaging early enough with us about permitting may cause a delay to the project.
Solution	Engage promptly us to see if a permit application for any discharge from the site is required. Be clear that a discharge to a watercourse, whether it is a main river or ordinary watercourse can require a permit for a discharge.
Additional narrative/ explanation: Guidance is available here: Discharges to surface water and groundwater: environmental permits - GOV.UK. See Appendix C for more information. Our jurisdiction over discharges to watercourses has been omitted. It states that “disposal in accordance with permits”, but there is no acknowledgement that permission could be required for such a discharge of runoff or dewatering.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2: Proposed Scheme, section 2.6.11	
Issue	It is unclear whether drainage infrastructure and measures to remove suspended solids would be installed at Maintenance and Access Point (MAP) construction compounds, before the compounds become operational.
Impact	Without installing relevant SuDS and sediment management (like silt fencing), there is a risk that in the event of a heavy rainfall, or pollution event, any contaminated water will not be adequately managed.
Solution	The Applicant should commit to installing suitable drainage as a priority for temporary works and prior to other installations.
Additional narrative/ explanation: We acknowledge that the construction programme is unknown at this stage.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2: Proposed Scheme, section 2.5.16 and 2.5.18	
Issue	Pump stations and the Riverside Campus will have heat exchangers, pumps and ancillary equipment; however, it is unclear if bunding will be used.
Impact	Without bunding, electrical equipment or pumps could leak, and hydrocarbons could all pose an unacceptable risk to the water environment receptors.
Solution	Electrical equipment containing hazardous components (i.e. transformers) should be bunded for all phases of development. They will need to be suitable sized to contain 110% of the volume. If there is a risk they are exposed to rainwater, the Applicant must have a mechanism to remove accumulated rainwater regularly.

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 19: Water Environment and Flood Risk, Table 19-5	
Issue	Table 19-5 is about receptor importance, but we are unsure how downstream effects have been considered in assessment methodology.
Impact	If watercourses are not given a high enough receptor importance, then mitigation measures to provide protection may be inadequate. Impacts

	on smaller watercourses can still impact WFD watercourses through hydrological linkages.
Solution	The Applicant should assess if watercourses and drains, which may not have a WFD classification, could flow into or are tributaries of WFD classified watercourses and if there could be downstream effects. Where this is the case, receptor importance should be increased from Low/Medium to High.

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 2: Proposed Scheme, section 2.6.7 Volume 1, Chapter 5: EIA Approach and Methodology, section 5.7.8	
Additional narrative/ explanation: Where a Framework CEMP is being prepared as part of the DCO application, we request that the Environment Agency is named as a consultee on the CEMP requirement in the draft DCO. We note that section 2.7.2 does not mention a framework Operation Environmental Management Plan (OEMP), and section 5.7.8 does not list a Surface Water Management Plan. We would advise the Applicant to consider these.	

Fisheries

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report Chapter 19, Water Environment and Flood Risk, paragraph 19.5.10	
Issue	Paragraph 19.5.10 appears inconsistent with earlier sections of the report. Previous text states that no water will be sourced from the River Thames for operation of the scheme; however, this paragraph suggests that water may be obtained through suppliers associated with the Riverside Campus. It is therefore unclear whether operation of the scheme could result in additional abstraction from the River Thames, either directly or indirectly.
Impact	This lack of clarity makes it difficult to assess the environmental effects of the scheme and its compliance with water resources legislation.
Solution	Provide further detail on the proposed water supply arrangements, clearly confirming whether operation of the scheme will require any

	additional abstraction from the River Thames, directly or indirectly via third-party suppliers.
Additional narrative: If additional abstraction is required, the assessment should demonstrate that it can be accommodated within the relevant abstraction permit(s). The report should also confirm compliance with the Eel Regulations and specify that any intake screening will be designed to meet Best Achievable Eel Protection (BAEP) standards in line with Environment Agency guidance, including the requirements set out in <i>LIT 60515: Screening at Intakes – Measures to Protect Eel and Elver</i>, which is available upon request. Any additional abstraction required to support the scheme must be undertaken within the limits of a valid abstraction permit. Furthermore, any abstraction has the potential to affect eel populations and therefore must comply with the Eels (England and Wales) Regulations. Intake structures would need to achieve BAEP in accordance with Environment Agency guidance, including appropriate screening measures.	

Biodiversity

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report Chapter 19: Water Environment and Flood Risk Table 19-5: Criteria to Determine Receptor Importance (Adapted from DMRB LA 113 (Ref 19.87))	
Issue	Only watercourses having a Water Framework Directive (WFD) classification within a River Basin Management Plan (RBMP) are identified as being of high or very high importance.
Impact	Impacts towards undefined watercourses not measured appropriately.
Solution	Ensure all impacts towards watercourses are measured and demonstrate compliance, both at the spatial and temporal scale. This includes cumulative impacts which should also be assessed.
Additional Narrative: All watercourses are protected under the WFD, even if not all watercourses are assigned a WFD status. Impacts towards watercourses not formally defined under a RBMP can still cause deterioration risk at a waterbody scale.	

We do not believe the Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3 part 10 (LA 113) (dated March 2020, Revision 1) to be appropriate for assessing impacts for flood risk, hydromorphology and water quality.

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report Chapter 19: Water Environment and Flood Risk Table 19-5: Criteria to Determine Receptor Importance (Adapted from DMRB LA 113 (Ref 19.87))

Issue	Only watercourses having a Water Framework Directive (WFD) classification within a River Basin Management Plan (RBMP) are identified as being of high or very high importance.
Impact	Impacts towards undefined watercourses not measured appropriately.
Solution	Ensure all impacts towards watercourses are measured and demonstrate compliance, both at the spatial and temporal scale. This includes cumulative impacts which should also be assessed.

Additional Narrative:

All watercourses are protected under the WFD, even if not all watercourses are assigned a WFD status. Impacts towards watercourses not formally defined under a RBMP can still cause deterioration risk at a waterbody scale.

We do not believe the Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3 part 10 (LA 113) (dated March 2020, Revision 1) to be appropriate for assessing impacts for flood risk, hydromorphology and water quality.

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report Chapter 8: Ecology, Section 8.4.11, Table 8-4, Table 8-8

Issue	Species (direct mortality/harm) is scoped out for construction.
Impact	Protected species, such as Water Voles could be
Solution	Scope species (direct mortality/harm) in for construction.

Additional Narrative:

It is stated that during construction, any effects would be controlled through compliance with existing legislation and implementation of the CEMP. Scoping out these impacts relies on mitigation measures that have not yet been fully defined within a Framework Construction Environmental Management Plan (CEMP). As such, there is insufficient information to conclude that impacts to protected species can be scoped out for construction works.

We note contradictory text within the scoping report. Section 8.4.11, in regards to the Crossness Local Nature Reserve (LNR) (a habitat for Water Vole) states that the depth of the pipeline will mean that there will be no effects. However, table 8-4 states that “The Proposed Scheme will pass below the LNR, working areas above ground may be located within and/or adjacent to the LNR.” With working areas being located within the LNR, we’d need confidence that the Framework CEMP contains adequate control and mitigation measures, to avoid impacts to Water Voles.

Water Voles are protected under the Wildlife and Countryside Act 1981. The Environment Agency have a statutory duty to ensure the conservation of Water Voles and their environment under the Environment Act 1995. Water Voles are listed as a Biodiversity Action Plan species.

Flood risk

Document reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 15 Noise & Vibration

Issue	Flood defence infrastructure isn’t explicitly identified as sensitive receptors within the vibration assessment.
Impact	Construction vibration has the potential to adversely affect flood defence assets, including buried structural elements that may not be immediately visible.
Solution	The ES should explicitly identify flood defence infrastructure as sensitive receptors within the construction vibration assessment.

Additional narrative:

Failure to assess impacts on flood defence infrastructure could:

- Compromise the structural integrity or operational performance of flood defence assets;
- increase future maintenance requirements;
- reduce the effectiveness of flood risk management infrastructure;
- increase flood risk to surrounding communities and the development itself.

There is a clear interaction between vibration impacts and flood risk, so these topics should not be considered entirely independently.

The assessment should:

- Consider the potential effects of construction vibration on both above-ground and below-ground flood defence assets;
- Assess whether vibration could affect structural integrity, stability or long-term performance of flood defences;
- Consider any cumulative implications for flood risk arising from vibration-related impacts;
- Ensure the appropriate mitigation measures are identified where necessary to prevent damage to flood risk management infrastructure.

We support the proposal in Table 15-14 to scope construction vibration into the Environmental Statement.

Document Reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report Chapter 19, Water Environment and Flood Risk, paragraph 19.5.10

Issue	Whilst we support the inclusion of flood risk from all sources for the construction and operational phases of the development (as per Table 19-8) the scope doesn't specifically include: • Present-day and future flood risk, including the effects of climate change throughout the lifetime of the development; • Assessment of residual flood risk, including breach and overtopping scenarios; • Consideration of design flood levels to ensure that essential infrastructure required to remain operational during flood events can continue to function; • The long-term performance, condition, maintenance and future adaptability of existing flood defences; • Consideration of requirements set out within the Thames Estuary 2100 Plan.
Impact	Without these considerations being clearly scoped into the Environmental Statement, there is a risk that: • Flood hazards during both current and future scenarios are not fully understood; • Critical infrastructure may not remain operational during flood events; • Residual flood risks associated with defence breach or overtopping is not fully understood;

	- Existing flood defences may not remain fit for purpose over the lifetime of the development; - The development could constrain future flood defence improvements required by the TE2100 Plan; - The development may fail to demonstrate compliance with national flood risk policy requirements, including the need for development to remain safe for its lifetime without increasing flood risk elsewhere.
Solution	The assessment of flood risk as part of the Environmental Statement should: - Assess flood risk from all sources under both present-day and future flood scenarios, taking account of climate change; - Assess residual flood risk using the EA's most up-to-date breach modelling for the Thames; - Demonstrate how essential infrastructure required to remain operational during flood events will be protected, ideally through setting critical infrastructure above the modelled 2100 tidal breach flood level where possible; - Clearly demonstrate how the development will remain safe throughout its lifetime, including breach and overtopping scenarios; - Demonstrate how flood risk is reduced wherever possible; - Confirm that the development will not prevent future raising, maintenance, repair or improvement of flood defences and aligns with the objectives of the Thames Estuary 2100 Plan.
Additional narrative: The study area currently benefits from a very high standard of protection from the Thames tidal flood defences, equivalent to approximately a 1 in 1,000 annual probability event. However, the latest Environment Agency flood modelling for the Thames indicates that the site would be at risk in the event of defence breach or overtopping. The Environmental Statement should include an assessment of the consequences of a breach, using our latest breach modelling, including impacts on above ground infrastructure and on any access and egress routes (during construction or operation). The assessment of flood risk should also consider the following:	

- Current flood defence situation:
 - The current condition of flood defence assets, supported by a recent condition survey;
 - Any works required to ensure the lifespan of flood defences is commensurate with the lifetime of the proposed development;
 - Confirmation that defences currently achieve the Statutory Defence Level (SDL), and any proposals to achieve and maintain the SDL where this is not currently the case.
- Future flood defence situation:
 - Demonstration of how the development has considered the requirements of the TE2100 Plan;
 - Evidence that the development will not constrain the future raising of flood defence levels;
 - Details of how future defence raising required by TE2100 will be delivered, including indicative timing and methodology;
 - Evidence that flood defences can continue to provide protection throughout the lifetime of the development.

Given that the scheme does not have a proposed end date and is expected to be kept operational (as stated in paragraph 2.8.1), particular consideration should be given to the assessment of the credible maximum climate change scenarios for peak river flow and sea level rise. This will demonstrate the scheme's resilience to more extreme flood events.

Document reference(s): Environmental Impact Assessment Scoping Report
Volume 1: Main Report, Chapter 15 Noise & Vibration

Issue	Set back of 16m from tidal flood defences is not committed to for the construction phase.
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Impact	The structural integrity of defences could be undermined by construction works.
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Solution	16m for set back from tidal flood defences should also be sought for the construction phase where possible.
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Additional narrative:

Whilst we support the 16m setback from flood defence assets referred to in paragraph 19.7.8(f) in relation to the operational phase, setback should also be sought for the construction phase where possible.

Water Resources

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 19 Water Environment and Flood Risk	
Issue	Operational water demand is not clearly identified. The extent of consumptive water use is as yet unclear.
Impact	Thames Water supply (inc. direct abstraction of raw water) may not be available to the project if during peak demand, as there is no surplus to supply new development.
Solution	The project should confirm the availability of Thames Water supply for consumptive operational water demands to ensure the viability of this source of supply intended to be used by the scheme.
Additional narrative: The location of this development is in an area of serious water stress (as identified in our report Water Stressed Areas – 2021 Classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification)). Developments have the potential to increase demand for water and result in increased abstraction from water company sources. The project description identifies supply from Thames water and options appear to include potable supply and/or direct (raw) water supply from an existing abstraction. We are pleased to see that the increased uptake from either of these sources has been scoped in for further assessment. The Environmental statement should provide a more detailed conceptualisation of the water demands of the project regarding the closed loop nature of the operational process water (assumed to be low in consumption) and the interaction with the Thermal storage reservoir.	

Document Reference(s): Environmental Impact Assessment Scoping Report Volume 1: Main Report, Chapter 19 Water Environment and Flood Risk	
Issue	Consumptive water demands during construction have been identified, however there remains some uncertainty around source of supply.
Impact	Thames Water supply (inc. direct abstraction of raw water) may not be available to the project if during peak demand, there is no surplus to supply new development.

Solution	The project should confirm the availability of Thames Water supply for consumptive water demands in order to ensure the viability of meeting construction demands. Alternative sources of supply should be appraised if water supply from Thames water is unavailable.
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Additional narrative:

Other sources of water supply should be considered for construction demands identified which include (but may not be limited to):

- Dust suppression;
- Tunnelling activities;
- Site welfare;
- Hydrostatic testing.

Some water companies in water stressed regions in the south-east have limitations on water supply for non-domestic uses. If Thames Water are unable to confirm availability of water for non-domestic uses particularly during Summer, prolonged dry weather and drought where there may not be surplus to meet peak demand.

The CEMP should also set out ways in which the project attempts to reduce water demand and to adopt water efficiency measures where possible.

APPENDIX C – Informatives

Environmental permits

Flood risk

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

We would advise the applicant ensures they have accurately identified the location and extent of buried infrastructure, including flood defence assets and culverted watercourses

It would be helpful to understand whether the Applicant is proposing to disapply the Environmental Permitting Regulations (EPR) for Flood Risk Activity Permits (FRAPs). We would recommend early engagement of this matter.

Early engagement and the tracked service

We have concerns regarding the lack of consideration of potential abstraction and discharge activities, and the corresponding environmental permits that may be required. Furthermore, these considerations are important in the context of permitting:

- How and where dewatering will be disposed of;
- how and where slurry arising from tunnelling operations will be separated and disposed of;
- the source of water for the closed loop circulation system;

- whether intermittent or temporary direct or indirect discharges will be required for the project, for example:
 - emergency discharges at pumping stations;
 - temporary discharges during planned maintenance works.

Until these details are confirmed, it is not possible to determine the full range of permits and consents that may be required for the construction and operation of the project.

We strongly recommend that the Applicant develops a permitting and consents strategy, setting out the permits/consents anticipated to be required, the relevant regulatory routes, and an indicative timeline for securing these.

As previously raised, we would also recommend that the Applicant makes use of the Environment Agency's tracked service to progress engagement on permitting matter in parallel with the DCO process. For further information, please see [Request environmental permit coordination for major projects - GOV.UK](#). For any questions, please contact trackedservice@environment-agency.gov.uk.

Dewatering, abstraction and discharge

For dewatering, the requirement for a Water Resources Abstraction License applies unless the activity is exempt under [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017](#) or [RPS 368](#). The developer should determine the [need for an abstraction license](#) at an early stage. We advise early consideration should be given to this, so that permitting timescales can be built into the development programme so as not to cause delays. The Applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised or utilise our [pre-application advice service](#).

We recommend the developer should follow the [Hydrological Impact Appraisal for dewatering abstractions guidance](#).

The proposed development may need:

- a groundwater investigation consent (section 32/3 of the Water Resources Act 1991) to construct and test pump; and
- a full abstraction licence (Water Resources Act 1991) if the volume of groundwater abstracted is greater than 20 m³/day and abstraction will occur for longer than a period of six consecutive months.

Further guidance can be found at: <https://www.gov.uk/guidance/water-management-abstract-or-impound-water#abstractions-that-need-a-licence>.

There may be a requirement for an associated [EPR permit to discharge](#) unless an exemption applies; this should also be considered at an early stage.

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works](#). It may also require a discharge permit if it falls outside of our [regulatory position statement for de-watering discharges](#).

If the Applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on GOV.UK: [Abstraction licensing strategies \(CAMS process\)](#) and [Apply for a water abstraction or impounding licence](#).

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. The Applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The Applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: [Discharges to surface water and groundwater: environmental permits](#).

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Control of Major Accident Hazards

As part of the COMAH Competent Authority (CA), we would like to make the Applicant aware that there are numerous COMAH sites within close proximity to the main site boundary of the proposed development.

Any electricity cabling, gas pipelines, or other infrastructure, will need to consider their proximity to the COMAH sites, in regard to the construction, operation and decommissioning phases of the project.

COMAH establishments are regulated by the COMAH CA. The CA comprises the Health and Safety Executive (HSE) and the relevant environmental regulator, the Environment Agency (EA) in England, acting jointly.

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater

Waste to be taken off site

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework

for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to [our website](#) for more information.

Sustainable drainage systems

The Environment Agency supports the Government's expectation that sustainable drainage systems (SuDS) will be provided in new developments wherever appropriate.

- Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:
- be suitably designed
- meet Government's non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

Water Framework Directive Assessment

WFD guidance is missing in reference to Water Framework Directive compliance assessment; and the baseline data in 13.4.1 makes no reference to the Water Quality Explorer.

If all relevant guidance is not used, WFD assessment and baseline assessments may not be based on complete information.

The Applicant should use these guidance links to support the WFD Assessment and baseline information:

1. We recommend the Applicant uses the Water Quality Explorer for available data for the baseline: [Map Explorer | Water Quality Explorer](#)
2. This guidance summarises the requirements of The Water Environment Regulations 2017 in relation to Nationally Significant Infrastructure Projects: [Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK](#)

This advice is not limited to estuarine and coastal waters in England, the guidance sets out general principles and a staged approach to assessment that can be used for other water bodies such as rivers, lakes and groundwater: [Water Framework Directive assessment: estuarine and coastal waters - GOV.UK](#)

The Applicant should be aware that the next comprehensive update of classifications in all water bodies, as required in the WFD Regulations, is the 2025 classifications. Draft 2025 classification results have been finalised and can now be shared externally with stakeholders on demand through a Freedom of Information (FOI) request.

Where WFD classifications are summarised in Appendix 19-1, when a WFD Assessment is produced, the Applicant should provide reasoning of why water bodies are not achieving good, where applicable. (We note the Water Quality Explorer is referenced in Appendix 19-1).

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**Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
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SL1 4PN**

Area Director: [REDACTED]By email: LondonStrategicHeatMain@planninginspectorate.gov.uk

Ref: EN0710009

3rd August 2026

Dear Sirs

London Strategic Heat Main NSIP
Forestry Commission advice re Scope of Environmental Impact Assessment

Thank you for seeking the Forestry Commission's advice re this project. As background we would note that we have seen large district heating systems in Finland where large sawmills have utilised their 'co-product' from sawmills to heat the adjacent town – example Jyvaskyla.

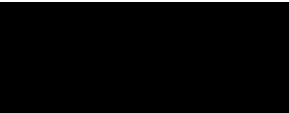
Key aspects we recommend are scoped:

1. Impact on existing green space, particularly the treescape:
 - a. Avoid loss and deterioration of existing treescape (ancient woodland veteran trees are irreplaceable)
 - b. Modern small tunnel boring machines and horizontal direct drilling are increasingly being used to lay pipelines and cables well below the rooting depth of woodland and trees; example 'Water for Life' project in S Hampshire installing pipelines below Havant
2. Seek opportunities to enhance the greenspace/treescape
3. Explore opportunities to 'lay' other networks in the same tunnel/route
4. Appreciating that the proposed heat source for the network is waste we would nevertheless encourage consideration of sustainably sourced woody biomass from existing woodlands and heaths in the SE&London. Prior to the Industrial Revolution local woods supplied fuel to local homes and businesses (and in some cases charcoal to London). As such traditional management such as coppicing maintained a diversity of woodland habitats which benefited our native woodland

flora and fauna. It is only over the last century that woody biomass has been less used and the woodlands and heaths have lost the market driver which supported their management. Heathrow T2/5 are now heated, powered and cooled with locally sourced wood. The relatively new powerstation in Sandwich also utilises locally sourced wood and was located on the former FISA industrial site to utilise the heat from the system. UK Forestry Regulations provide a robust protocol to ensure that locally sourced wood is produced sustainably and modern systems can remove any particulates from emissions.

We hope these comments are helpful. If you have any queries please do not hesitate to contact me.

Yours faithfully



Partnership & Expertise Manager South East

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HSE email: NSIP.applications@hse.gov.uk

Email: LondonStrategicHeatMain@planninginspectorate.gov.uk

Dear Mr Gary Chapman (PINS)

Date: 23 July 2026

**PROPOSED LONDON STRATEGIC HEAT MAIN (the project)
PROPOSAL BY CORY ENVIRONMENTAL HOLDINGS LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 7 July 2026 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed **London Strategic Heat Main Project** components as specified in the ***Environmental Impact Assessment Scoping Report, Volume 2: Figures, Part 1 of 3, Cory Environmental Holdings Limited, Dated July 2026, Figure 1-1: "EIA Scoping Boundary"***, does appear to cross the Consultation Zones of three Major Accident Hazard (MAH) sites and three MAH pipelines. Please see the list attached in Appendix 1 a (MAH sites) & b (MAH pipelines).

The Applicant should make contact with the operators of MAH sites (see Appendix 1 a), to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

The Applicant should also make the necessary approaches to the relevant MAH pipeline operators (see Appendix 1 b). There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation if the development proceeds.
- iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

If hazardous substances planning consent is required, please consult HSE on the application.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3

Appendix 1

a. Major Accident Hazard sites:

	HSE Reference	MAH site Operator	MAH site Address
1	H4897	Asda Stores Limited Distribution Centre, LNG Facility.	Asda Erith CDC Distribution Centre Norman Road Belvedere DA17 6JY
2	H3622	Univar Limited.	Bugsby Way Greenwich Peninsula London SE10 0QD
3	H0260	Nufarm UK Ltd	Crabtree Manorway Belvedere Kent DA17 6BQ

b. Major Accident Hazard pipelines:

	HSE Reference	Transco Reference	Pipeline Operator	Pipeline
1	7799	2056	Southern Gas Networks	Port Greenwich / Whyteleafe (G.M. 1)
2	7804	2061	Southern Gas Networks	Port Greenwich / Horn Lane (GM11/1)
3	7806	2063	Southern Gas Networks	Bugsby Way / Welling (GM 11/3)

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely



CEMHD4 NSIP Consultation Team

Privacy Notice details

English

Privacy information

HSE staff will process your data as part of our work primarily for the purpose of inspections and investigations, interventions and assessments in support of law enforcement.

Please see <https://www.hse.gov.uk/help/privacy.htm> for more details.



██████████
Senior Environmental Advisor
on Behalf of the Secretary of State
Environmental Services
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Our ref: PL00802376
GLAAS240285
Your ref: EN0710009

Direct dial: 020 ██████████

3 August 2026

Dear ██████████

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11**

*Proposed application by Cory Environmental Holdings Limited (the applicant) for an
Order granting Development Consent for the London Strategic Heat Main (the
proposed development).*

Thank you for your letter of 7 July 2026 consulting us about the above EIA Scoping Report. The proposals relate to the development of a strategic heat transmission trunk main and 14 transmission branches over a total distance of 55km. The proposal will cross significant areas of Greater London, potentially impacting, the significance and setting of many heritage assets including World Heritage Sites, listed buildings, conservation areas, scheduled monuments and non-designated heritage assets.

This letter is a response by Historic England that combines input from Inspectors of Ancient Monuments, Inspectors of Historic Buildings and Areas, plus Archaeology Advisors from the Greater London Archaeological Advisory Service (GLAAS) who give advice on archaeology and planning to and on behalf of London's local planning authorities (except the London Borough of Southwark in respect of GLAAS).



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Advice

In line with legislative and policy provisions, we would expect the Environmental Statement to contain a thorough assessment of the likely effects, or impacts, of the proposed development on the significance of all heritage assets that are likely to be affected by the proposals.

As well as addressing potential impacts on designated heritage assets, we would also expect the Environmental Statement to consider the impacts on non-designated heritage assets of historic, architectural, archaeological or artistic interest. These can also be of national importance, be worthy of archaeological investigation and make an important contribution to the character and local distinctiveness of an area and its sense of place. The potential for new archaeological discoveries will require consideration.

Archaeology is a fragile and non-renewable resource that can be represented by artifacts, structural remains and deposits that can be affected by changes that occur close by as well as from direct ground disturbance works. In terms of understanding areas of archaeological potential, Archaeological Priority Areas (APA) will provide an indication of the form and level of possible archaeological interest. If an area is not described as being an APA it does not mean it is devoid of archaeology, rather that no specific information is currently available to inform such a classification. Further details can be found on our web site: <https://historicengland.org.uk/advice/planning/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>

The scope of anticipated non-designated archaeology will range from deeply buried prehistoric evidence (specifically in the areas of former marsh, Roman roads and roadside settlements, medieval settlement and industry through to Civil War period and Industrial archaeology. The significant potential and intensity of archaeology within the City of London and Westminster, represented by deep urban archaeology will be a major challenge to manage and minimise impact. The same applies in Southwark in the context of alluvial, suburban riverine occupation along the Thames and its tributaries. Especially in respect of works within the City of London, the use of road space for the location of MAPS will have the potential to impact nationally important archaeology.

Given the range of archaeological potential and type that can be anticipated, a range of bespoke assessment, evaluation and response will be necessary.

Information on non-designated heritage assets is available from the Greater London Historic Environment Record and relevant local authority staff.

It is important that the EIA is designed to ensure that all impacts are fully understood. It will therefore be essential that the applicant continues to engage with Historic England to identify those potential impacts and seeks to avoid or minimise any harm



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arising from the proposals, in line with policies set out in the Overarching National Policy Statement for energy (EN-1, Dec 2025).

We have the following detailed comments to make regarding the content of the Scoping Report:

1. Study Area

We note that the 100m study areas used here are for the purposes of scoping only. We agree that further work is needed to refine this, and to identify the potential designated and non-designated heritage assets that may be impacted by the proposals.

An initial inspection of the Scoping Report indicates that several designated heritage assets which may be impacted by the proposals are not currently Scoped In for consideration. These include, but may not be limited to, the grade I listed former Crossness Pumping Station, various listed buildings within the former Woolwich Arsenal, Southwark Underground Station and the grade I listed former Church of St. John, Smith Square.

2. Construction phase

Construction activities have the potential for impact on the significance of designated and non-designated heritage assets. This may be through impact on the heritage assets or their settings.

Adverse effects may be caused by intrusive construction activities within the setting of heritage assets and direct or indirect physical impacts. For example, we are aware that the proposed below ground tunnelling activities may cause associated noise, vibration or settlement that has the potential to impact on the historic environment around the tunnel route. There may also be permanent impacts where buildings or structures are proposed to be demolished, or where buried archaeology, trees or landscape features are proposed to be removed.

We are therefore pleased to see that all construction impacts for both designated and non-designated heritage assets are Scoped In.

We recommend that, at minimum, the following activities and potential effects are fully considered in the assessment:

- noise;
- vibration;
- temporary structures and activities;
- compaction of surfaces over archaeological remains;
- settlement;



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- alterations to drainage patterns that may lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits;
- temporary structures and activities;
- re-routing of services;
- changes to uses that currently form part of the viability or significance of heritage assets.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

We support the provisions to avoid harm to the historic environment, monitor changes to heritage assets and address harmful impacts if they were to arise.

This will be particularly important when assessing potential locations for Maintenance and Access Points (MAPs), Tunnel Heads, and Construction Sites, which are likely to require significant areas of land.

The selection of these sites needs to be carefully considered, and you may need to consider alternative options for some sites are brought forward for assessment and discussion with ourselves as well as the relevant local authorities.

3. Operation phase

We have concerns regarding the proposal to Scope Out operational effects on designated and built heritage non-designated heritage assets. Because we do not know the location of the MAPs, there is the potential for harmful effects to the significance of heritage assets through intrusive elements within their setting. We consider that this aspect of the scheme should remain Scoped In.

4. Marine works

We understand that all river crossings will be undertaken at depth below the riverbed, and there will be no in-river or riverbank works. Therefore, we agree that effects on marine archaeology can be Scoped Out.

5. World Heritage Sites

When considering the route that is currently proposed, we note the potential for impacts on the significance and Outstanding Universal Value (OUV), of both the World Heritage Sites at Greenwich and Westminster, the latter due



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to works within its setting. We agree with the decision to Scope In the Maritime Greenwich WHS for further detailed assessment.

We are concerned that there is insufficient justification at this early stage, in the absence of the screening stage of a World Heritage Impact Assessment (HIA), having been undertaken, to Scope Out the Westminster WHS based on the distance from the proposed scheme alone (100m study area). This is an internationally designated heritage asset of the highest significance and sensitivity. It is important that there is a clear understanding of any potential for impact at any stage, or clear evidence that the proposals would not affect either its significance or OUV, including that contribution made by its setting.

We strongly recommend that the applicant start to implement an iterative process of heritage impact assessment (HIA), for both properties, guided by the UNESCO *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022). We welcome the fact that this guidance is referenced in the Scoping Report.

Undertaking the initial screening stage now will clarify whether, and if so how, each attribute of the World Heritage Sites' OUV could potentially be affected, including by any contribution made by the properties' settings. This will provide essential justification about whether Westminster WHS should be Scoped In for further assessment and will also provide a clear understanding of where future stages of HIA for Maritime Greenwich WHS should be focused and what information would be required.

Historic England would welcome the opportunity to provide more detailed advice on the implementation of a process of HIA and to support the implementation of the initial screening stage on which basis we would be able to provide further advice. In relation to both World Heritage Sites, we would recommend that the scheme initially focuses on seeking to avoid any negative impacts on their Outstanding Universal Value. HIA, when implemented as an active and iterative tool in the development of a proposal, provides the means to identify how to achieve this objective.

Given the proposed route through the Maritime Greenwich WHS in particular, we would also highlight the potential need for notification to UNESCO's World Heritage Committee, via its Secretariat the World Heritage Centre, in accordance with Paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention*. We will be able to provide more detailed advice on this requirement and its timing and implications when the initial screening stage of impact assessment for the two World Heritage Sites has been undertaken.



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We would strongly recommend that the applicant engages with the Conservation Officers of the boroughs involved as well as the development control archaeologist at the London Borough of Southwark with the development of this assessment.

Details of GLAAS guidance can be found on our web site:

<https://historicengland.org.uk/advice/planning/our-planning-services/greater-london-archaeology-advisory-service/publications-guidance/>

Historic England looks forward to working closely with the applicant to identify sustainable intervention locations and solutions for the historic environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

Historic England

Inspector of Ancient Monuments, London and South-East

Team Leader, Inspector of Historic Buildings and Areas, London and South-East

Archaeology Advisor, Greater London Archaeology Advisory Service, (GLAAS), City of London

Senior International Advisor, International Team

Archaeology Advisor, (GLAAS) south London

Team Leader (GLAAS) plus Westminster and Kensington & Chelsea



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The person dealing with this matter is: [REDACTED]

Direct Dial: [REDACTED]

Email: [REDACTED]@bexley.gov.uk

Our Application Reference Number: 26/01401/ALA

Date: 04/08/2026

LondonStrategicHeatMain@planninginspectorate.gov.uk

BY EMAIL

Dear [REDACTED]

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested.

Thank you for your letter dated 07/07/2026 which invites the Council to make comments on an Environmental Impact Assessment Scoping Report (Scoping Opinion) which has been submitted to the Secretary of State for their opinion as to the information to be provided in an Environmental Statement (ES) relating to the aforementioned proposal.

The Applicant has set out the proposed structure of the EIA which consists of the following environmental topic chapters.

- Air Quality
- Climate
- Ecology
- Ground Conditions
- Historic Environment
- Human Health
- Major Accidents and Disasters
- Marine Environment
- Materials and Waste
- Noise and Vibration
- Socio-Economics
- Townscape and Visual
- Transport
- Water Environment and Flood Risk
- Approach to Cumulative Effects

Having reviewed the submitted Scoping Opinion the Council is generally satisfied with the Scoping Opinion submitted. However, the Council would like to state the following:

Policy Update

Since the publication of your letter, on 16th of July the Mayor of London published a draft London Plan and it is anticipated that that a new NPPF will be published shortly after the summer recess. If this is the case and if an Environmental Statement (ES) is submitted post the adoption of a new London Plan or the updated NPPF, any current references to current policies, or paragraphs may need to be updated.

Ecology

The Scoping Report para. 8.4.29 states that no survey work will be carried out in relation to water voles as *“Currently it is expected that a buffer zone extending a minimum of 5m from the toe of the bank will be retained at existing ditches with potential to support water voles.”* However, this approach assumes that all construction activities outside of the 5m buffer will not affect water voles, this includes indirect impacts such as lighting, vibration, pollution, runoff, access, etc. There is a concern that in the absence of baseline surveys or a sufficiently detailed design that these assumptions may not have been formed on a sound basis. The Council, therefore, requests further evidence that demonstrates that water vole habitat will not be impacted by the proposals.

Table 8-8 Summary of Scope of Ecology Assessment states that significant effects on non-statutory designated sites during operation have been scoped out on the basis that maintenance activities are anticipated to be limited. However, the Scoping Report acknowledges that maintenance activities may require the use of oils, fuels, lubricants and cleaning agents, with a risk of accidental pollution. As the operational maintenance regime, including any requirements for emergency repair works, has not yet been fully defined, the Council requests that the Environmental Statement provides further detail

on the nature and frequency of maintenance activities and demonstrates why operational effects on designated sites can be robustly scoped out.

Table 8-2: List of Relevant Local and Neighbourhood Policy – Ecology

Does not list all relevant ecology policies for Bexley. Local Plan Policy DP19: The River Thames and the Thames Policy Area is missing.

Townscape and Visual

Paragraphs 17.2.1-3 (page 17-3)

The study area is identified as:

An initial TVIA Study Area of 500m from the Environmental Impact Assessment (EIA) Scoping Boundary¹ has been identified, plus an additional 2km from the Proposed Scheme's infrastructure at the Riverside Campus.

The 2km from the Riverside campus appears to be appropriate, and not dissimilar to the study area for the Carbon Capture facility. As the distance suggested is based on maximum parameters for the facility (per paragraph 17.2.2 which follows), this should be sufficient.

If the maximum parameters however at any point change, then there should be flexibility built in to amend the size of the study area if need be. This is particularly relevant to LBB due to the scheme's infrastructure at the Riverside Campus. Paragraph 17.2.3 alludes to this being the case, but we should emphasise the point with the view of us (LBB) being included under consultation as 'key stakeholders' which is the term referenced.

Paragraph 17.2.4 (page 17-3)

The Zone of Theoretical Visibility (ZTV) plan being produced for the ES is welcomed. However, as with the Carbon Capture application, it would be preferable if placing the development into a programme such a VuCity could be considered too.

Paragraph 17.4.6 (page 17-15)

No list is provided for the documents, but the Council would expect the Crossness CAAMP and the Local Views document to be included and considered.

Paragraph 17.6.2 (page 17-18)

The Bexley Urban Morphology Study (November 2019) should also be considered/included on the list of relevant documentation, for the TCA to draw upon.

Paragraph 17.6.5 (page 17-19)

States:

Representative viewpoints would be chosen once the geographical location of the Proposed Scheme components has been refined further. The visual assessment is not intended as an exhaustive assessment of all potential visual effects but rather an assessment of a sufficient number of views from a variety of distances and directions that allow a proportionate assessment of changes to visual amenity to be made to assess the likelihood of significant effects. The location of the representative viewpoints would be discussed with key stakeholders (such as the local authorities and GLA) with the aim of agreeing locations.

The agreement of representative viewpoints is welcomed, and dialogue encouraged.

Paragraph 17.6.10 (page 17-10)

States:

These limitations mean that the ZTV tends to overestimate the extent of visibility, both in terms of the areas from which the Proposed Scheme is visible and the extent of the Proposed Scheme which is visible. Consequently, the ZTV should be considered as a tool to identify areas of potential visibility for further targeted survey and assessment, and not a measure of the visual effect.

As per the comment for paragraph 17.6.5 above, this is why it is imperative that Local Authorities are consulted regarding the representative viewpoints, with local knowledge being paramount.

Paragraph 17.8.1 (page 17-30)

States:

This chapter has been based on the description and parameters of the Proposed Scheme set out within Volume 1, Chapter 2: Proposed Scheme of this EIA Scoping Report. Specifically, elements have been proposed to be scoped out of the assessment on the basis of the scale and extent of permanent above ground MAP infrastructure. Furthermore, it is assumed that the maximum height of the proposed infrastructure at the Riverside Campus associated with the Proposed Scheme would not exceed that of the surrounding existing infrastructure. These assumptions would be reviewed prior to the completion of the ES.

Provided that the assumptions are reviewed prior to the completion of the ES, this approach is satisfactory.

Table 17-8 (page 17-32)

Regarding townscape character (above ground operational infrastructure), it is noted that new operational lighting at Riverside Campus is scoped out due to the existing industrial setting. This matter is also explored earlier on in the document. What I

would state here is that this assumption seems to downplay any resulting cumulative effects that may arise from additional lighting being introduced to the existing industrial setting. At what point does additional lighting (and the/any apparatus which is required to support such) flip the balance over to a material change in the baseline, and therefore subsequent effects that would require consideration? This does not seem to have been explored.

Transport Matters

The Scoping Opinion notes that the proposal will affect five roads within Bexley, Norman Road, A2016 Eastern Way/Picardy Manorway, Yarnton Way, A2041 Harrow Manorway and Bazalgette Way. The documents note that the proposed construction methods include pipe jacking, a trenchless form of pipe installation.

Chapter 16-Socio-economics, notes the presence of the Public Rights of Way that interact with the assessment area, most notably Footpath 2 which extends from the southern end of Norman Road to join the England Coast path to the west of the Riverside facility. The conclusion notes that changes to the PRow during construction are to be considered within the ES, although during the operation phase are scoped out. It is unclear at this stage how close any reservoir would be to the PRow and subject to a suitable buffer between the facility and the route this would be acceptable.

However, should structures or equipment be positioned in the vicinity of the route or the PRow require diversion, then the operational phase will also need to be assessed.

Chapter 18-Transport deals with the effect on the local highway network. The area within Bexley affected by the proposal is less than others, however the effect on the road network is likely to be greater given the scale of works at Norman Road, and the method of construction meaning that arisings will be brought to the surface to be separated and transported for disposal, potentially including material from other boroughs depending on the final number and locations of the MAP and drive sites.

Section 2.6.14 notes an anticipated peak construction traffic of 102 daily (2 way) vehicle movements comprising 38 HGV and 13 LGV movements with average daily movements of 44 two way trips with a 75% HGV and 25% LGV split. This should be assessed within the ES noting variance between locations, and where possible tied to the indicative construction programme.

Given the requirement for a reservoir at Norman Road, it is considered that a significant number of these additional movements during the peak of the construction programme will likely be resulting from this activity.

Section 6.8.1 clarifies that to date there are no confirmed locations for the MAP or construction compounds and as such construction traffic routing cannot be assessed but will be available in the ES.

Table 18-21 shows the summary of the scope for transport assessment within the ES and it covers all aspects during the construction phase. It is accepted that during the operational phase only a minor number of trips would be generated unless major repairs were required and alongside the potential decommissioning can be scoped out of the report.

The Highway Authority notes that the proposed use of vehicles to transport arisings would be the most practical solution for most sites. Consideration however should be given for the use of the Middleton Jetty for arisings at Norman Road.

We hope you find the above of help and if you have any questions or require any clarification please do not hesitate to contact me using the above contact details.

Yours faithfully

A black rectangular box used to redact a signature.

Area Team Manager-North



Housing, Planning & Regeneration
Bromley Civic Centre, Churchill Court,
2 Westmoreland Road, Bromley, BR1 1AS

Direct Line: 020 [REDACTED]
Email: [REDACTED]@bromley.gov.uk
Our ref: 26/02746/OTH
Your ref: EN0710009

[REDACTED]
Senior Environmental Advisor
on behalf of the Secretary of State

BY EMAIL

22nd July 2026

Proposal: Consultation under Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11, relating to a Scoping Opinion in relation to the application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development).

Dear [REDACTED]

I am writing in response to your scoping consultation letter dated 7th July 2026.

The Planning Inspectorate (on behalf of the Secretary of State) will adopt a Scoping Opinion.

I can confirm that the London Borough of Bromley does not wish to make any comments on the scope and level of detail, of the information to be included within the Environmental Statement relating to the proposed development.

Yours sincerely,

[REDACTED]
Principal Planner
Development Management – Major Developments
Housing, Planning and Regeneration Services
Bromley Civic Centre
Churchill Court, 2 Westmoreland Road
Bromley, BR1 1AS
020 [REDACTED]
[REDACTED][@bromley.gov.uk](mailto:[REDACTED]@bromley.gov.uk)

Marine Licensing, Wildlife Licences and other permissions

Dear Sir/Madam,

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

<https://www.gov.uk/guidance/make-a-marine-licence-application>

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

The MMO is a signatory to the [coastal concordat](#) and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: [check if you need a marine licence](#) and asked to quote the following information on any resultant marine licence application:

- local planning authority name,
- planning officer name and contact details,

- planning application reference.

Following submission of a marine licence application a case team will be in touch with the relevant planning officer to discuss next steps.

Environmental Impact Assessment

With respect to projects that require a marine licence the EIA Directive (codified in Directive 2011/92/EU) is transposed into UK law by the Marine Works (Environmental Impact Assessment) Regulations 2007 (the MWR), as amended. Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR.

In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations <http://www.legislation.gov.uk/ukxi/2017/571/contents/made> may be applicable.

If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link

<https://www.gov.uk/guidance/make-a-marine-licence-application>

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions.

At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

A [map](#) showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our [Explore Marine Plans](#) service.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or

enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the [UK Marine Policy Statement](#) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process, please follow the link <https://www.gov.uk/topic/planning-development/marine-licences>



Maritime &
Coastguard
Agency

Maritime and Coastguard Agency

Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your ref: EN0710009

Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

30th July 2026

Via email: Londonstrategicheatmain@planninginspectorate.gov.uk

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development)

Dear Planning Inspectorate

Thank you for your letter dated 7th July 2025 inviting comments on the Scoping Report for the proposed London Strategic Heat Main (London SHM). The Scoping Report has been considered by representatives of Marine Safety & PNT Services, and the Maritime & Coastguard Agency (MCA) would like to respond as follows:

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The MCA would expect any works in the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act 2009 before carrying out any marine licensable works. We note that the project will be treated as development for which development consent is required under the provisions of the Planning Act 2008.

We note that the proposals for London SHM are to construct, operate, and maintain a heat transmission network to transport low carbon heat and potentially cooling, initially from anchor heat sources at Riverside Campus, located in Belvedere, in the London Borough of Bexley, to areas of high heat demand across London. The proposals include (but are not limited to):

- an underground pipeline network, comprising the Transmission Trunk Main and a series of Transmission Branches;
- Maintenance and Access Points (MAP) to the underground pipeline network, including pumping stations and connection apparatus for heat distribution networks;
- thermal storage infrastructure located at the eastern extent of the Proposed Scheme, close to Cory's Riverside Campus and/ or co location at MAP;
- connection to electrical supply either from the Riverside Campus or the electricity distribution network;
- new heat recovery system infrastructure at the Riverside Campus; and
- any required ecological, landscaping and public realm works.

We understand from the Scoping Report that where the London SHM crosses the River Thames, it will be at a minimum depth of 5m below the riverbed and that the depths of river crossings will be detailed in the Environmental Statement (ES). We further note that there are no planned intakes or discharges to the River Thames and limited potential for any works in the water column. It is also our understanding that as all of the river crossings are underground below the riverbed that *"there is no potential for likely significant effects to the marine environment of the River Thames, or any tidal tributaries. Accordingly, all marine environment topics are proposed to be scoped out of the Environmental Statement"*. The MCA would want to ensure that all receptors likely to have any impact on shipping and navigation are considered.

1. Based on the information provided in the Scoping Report, it is our understanding that there are no activities or construction works being undertaken below the Mean High Water Spring which could impact other marine users. The project is also not planning to use the River Thames for transport or removal of construction materials. Should this position change, the MCA would expect the impact on other marine users to be appropriately risk assessed, and we would expect to review the application and a proportionate navigation risk assessment at a later date. This should demonstrate that the risks associated with these works are reduced to As Low As Reasonably Practical (ALARP).
2. If a marine licence is not required as there are no works to be undertaken below the Mean High Water Spring which will impact the marine environment, the MCA would have no further comment on the EIA process.
3. Nonetheless, the proposed sections of the River Thames fall within the jurisdiction of a Statutory Harbour Authority (SHA), namely The Port of London Authority (according to Section 13.3.13 of the Scoping Report Volume 1). As SHAs are responsible for maintaining the safety of navigation within their waters, the relevant SHA should therefore be consulted on any proposed works within their jurisdiction. The MCA encourages the

applicant to consult with the relevant SHA where appropriate to develop a robust Safety Management System (SMS) for the project, in accordance with the Ports and Marine Facilities Safety Code (PMSC) and its associated Guide to Good Practice, to ensure that risks and impacts on other marine users are reduced to As Low As Reasonably Practicable (ALARP).

The MCA is satisfied with the scoping report at this stage as the basis for an Environmental Impact Assessment and an Environmental Statement from the shipping and navigation based on the understanding that there are no works or activities which impact other marine users. The MCA would expect any changes to be reassessed as appropriate.

I hope you find this information useful at this Scoping Stage.

Yours faithfully,

[Redacted Signature]

[Redacted Name]

Marine Licensing Project Lead
Marine Safety & PNT Services

Lead Development Liaison Officer
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Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
LondonStrategicHeatMain@planninginspectorate.gov.uk

04 August 2026

Dear Sir/Madam

RE: APPLICATION BY CORY ENVIRONMENTAL HOLDINGS LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE LONDON STRATEGIC HEAT MAIN (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 7th July 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations, overhead transmission lines and underground cables within close proximity the scoping area. These form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure **Substation**

- BARKING 400KV S/S
- BARKING 275KV S/S
- BARKING C 132KV S/S
- BARKING GRID 132KV S/S
- BARKING WEST 33KV S/S

Associated overhead and underground apparatus including cables

Overhead Lines

ZR ROUTE 400 kV

BARKING - WEST HAM 1
BARKING - WEST HAM 2

ZBH ROUTE 275 kV

BARKING - REDBRIDGE 1
BARKING - REDBRIDGE 2

Underground Cables

- DEPTFORD BR
- DUMMY CABLE ON TUNNEL CENTRELINE

We enclose plans showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

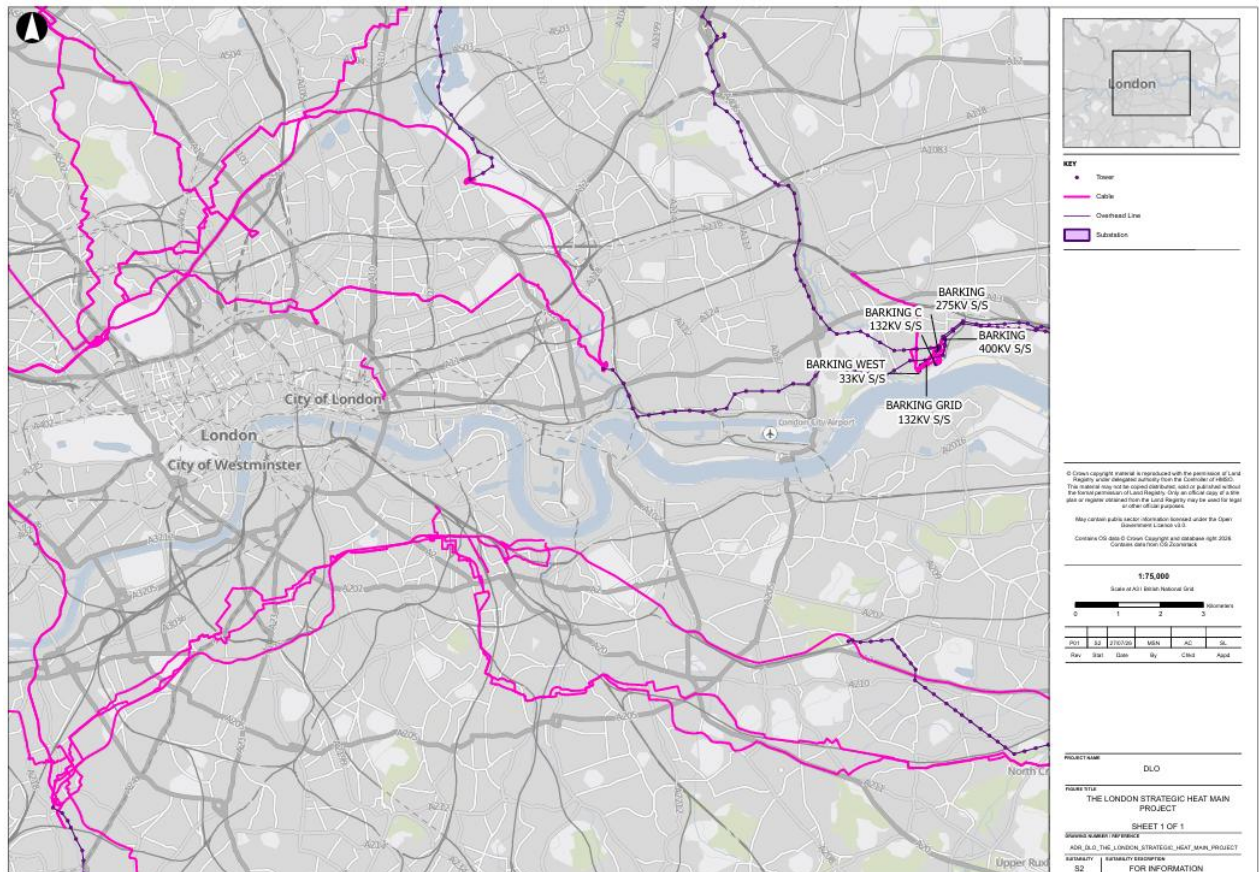


Figure 1: NGET Assets in proposed development area (BARKING 400KV S/S)



Figure 2: NGET Assets in proposed development area (BARKING 400KV S/S)

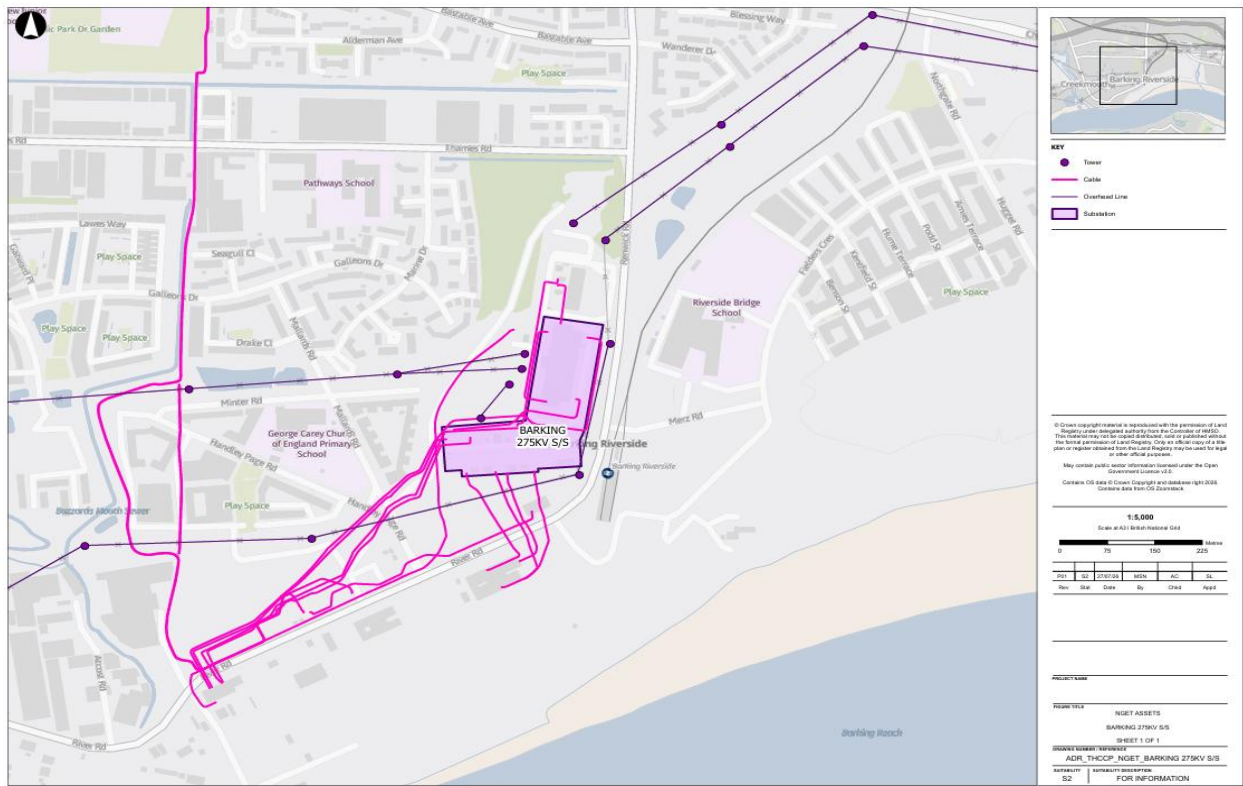


Figure 3: NGET Assets in proposed development area (BARKING 275KV S/S)

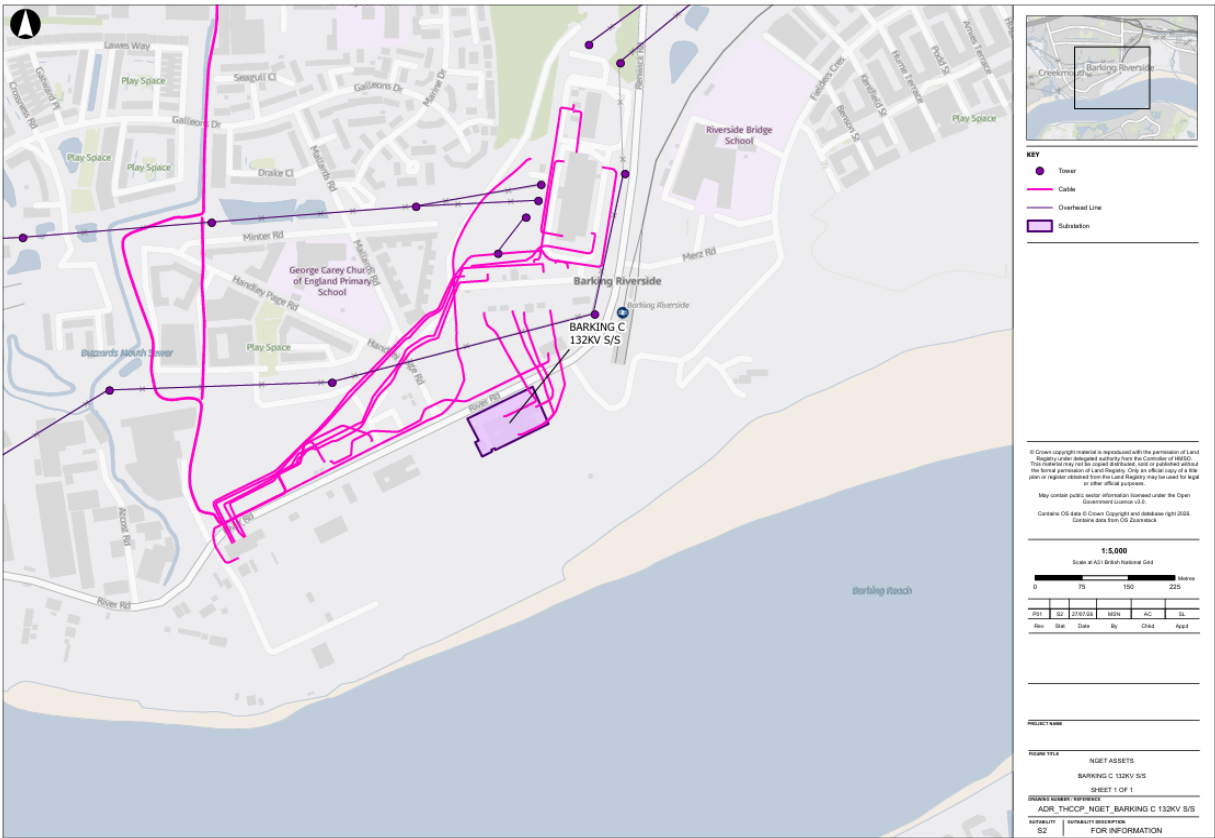


Figure 4: NGET Assets in proposed development area (BARKING C 132KV S/S)

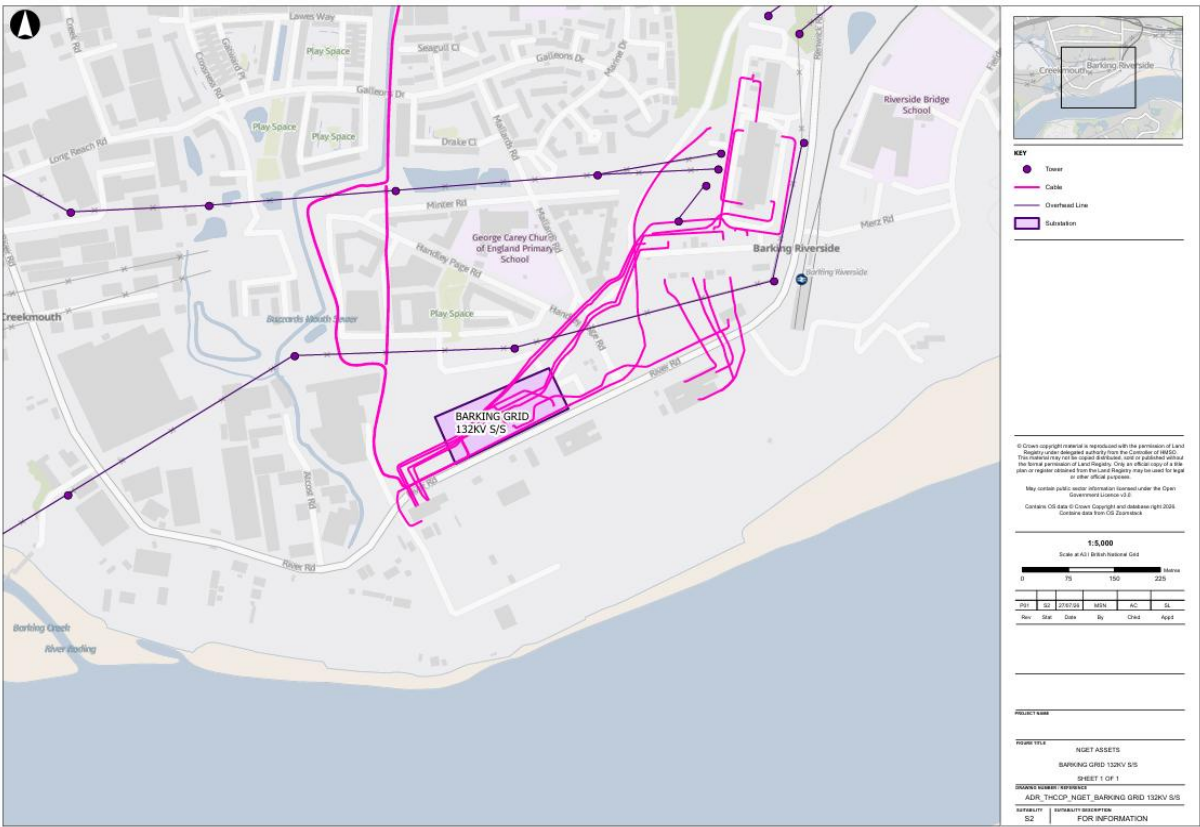


Figure 5: NGET Assets in proposed development area (BARKING GRID 132KV S/S)

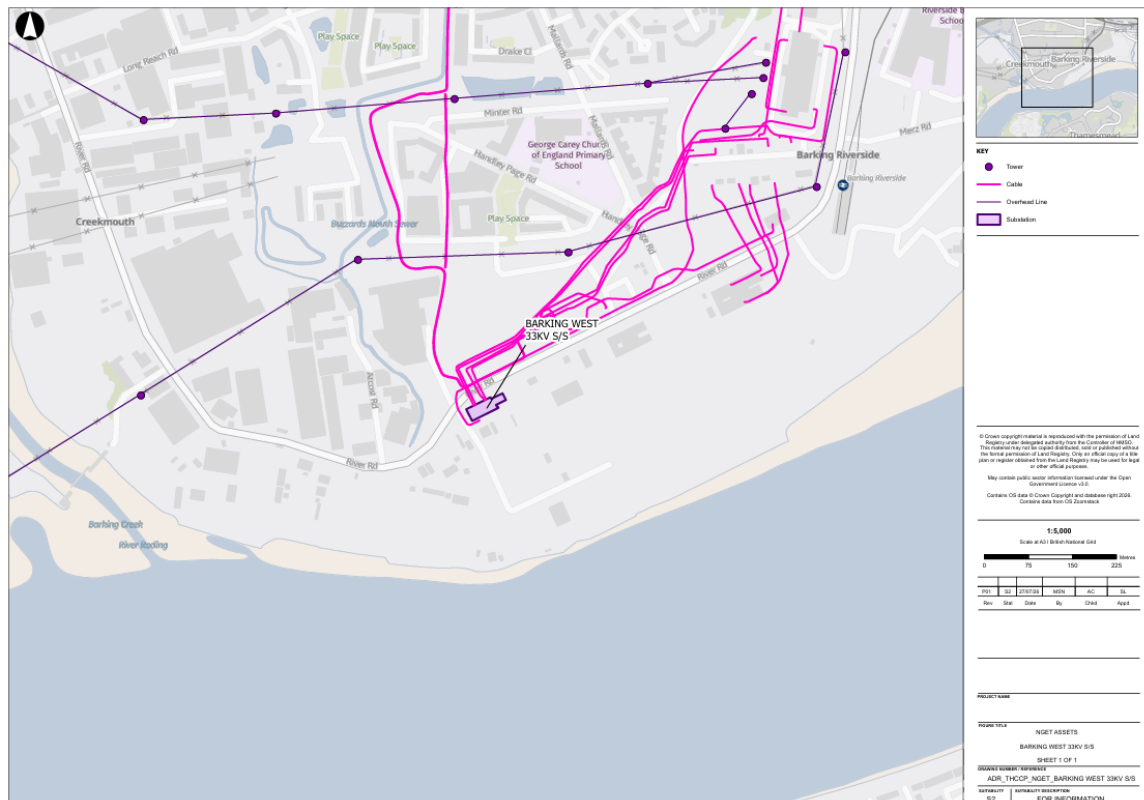


Figure 6: NGET Assets in proposed development area (BARKING WEST 33KV S/S)

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

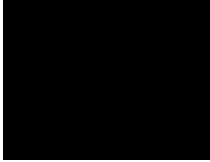
NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address:

box.landandacquisitions@nationalgrid.com

We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)



Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

THIRD PARTY DEVELOPMENTS NEAR NATIONAL GRID ELECTRICITY TRANSMISSION (NGET) TUNNEL ASSETS

This document is for internal and external use – primarily for 3rd parties.

Disclaimer

NGG and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements."

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PURPOSE AND SCOPE

National Grid is committed to operating electricity cables in a safe and reliable way with the minimum of inconvenience to our customers and local communities – this also includes any infrastructure that supports our cable network like underground cable tunnels.

Underground cable tunnels are a key component of our electricity network, primarily being located deep underneath heavily urbanised areas, they are used to avoid complex interfaces with existing infrastructure in the UK's major cities, as well as challenging geographical constraints.

This National Grid guidance document covers all work by 3rd parties where a proposed development could have an influence on the integrity of National Grid underground tunnel assets, including associated assets like headhouses, access shafts and other relevant infrastructure.

Examples of 3rd party works in proximity to underground tunnel assets might include general construction, excavations, demolition, installation of public utilities and other services including underground and overhead pipes and cables, surveys, ground investigation works and general access.

Further information about National Grid cable tunnel assets can be obtained by contacting National Grid Plant Protection and further contact information can be found in Appendix A.

PART 1 - PROCEDURAL

1 UNDERGROUND TUNNELS IN NGET

1.1 Underground Tunnel Locations

NGET has a significant amount of underground tunnels across its electricity transmission network, primarily containing HV cable assets that are owned and operated by National Grid.

For accurate locations of the National Grid cable network across the UK – please use the following link to obtain the relevant shape file for underground cables*:

<https://www.nationalgrid.com/uk/electricity-transmission/network-and-infrastructure/network-route-maps>

**Please note that a compatible GIS is required to use these files.*

1.2 Typical Underground Tunnel Construction

The majority of NGET underground tunnel assets are bored tunnels, which are constructed either by starting from one entrance and constructing the whole tunnel or by starting at both entrances and meeting in the middle. The tunnel sections for the majority of tunnel routes will have been constructed using a Tunnel Boring Machine (TBM).

With regards to more recent underground tunnel projects (for example London Power Tunnel), the tunnels themselves are typically single bored tunnels running from a primary substation to a receiving substation via a series of intermediary access shafts and headhouses – generally located between 20 and 60 metres below ground level, lined with fibre-reinforced precast concrete segments.

Other tunnel assets within NGET that also contain transmission cables are typically constructed using other standard tunnel construction methods (for example cut and cover), although the range of tunnel depths below ground level can vary significantly dependent on location, geology and other physical constraints.

Individual underground tunnel asset drawings and other relevant information (material, design specifications) can be provided by NGET (where available).

2 UNDERGROUND TUNNEL EXCLUSION AND SAFEGUARD ZONES

2.1 Exclusion Zone

NEET imposes an Exclusion Zone on all 3rd parties, which represents a pre-defined area around the tunnel structure where National Grid will not permit any encroachment from any private or utility planned development.

The Exclusion Zone, extending outwards from the exterior of the tunnel perimeter, prohibits any works in the close proximity of any tunnel asset that could have a negative impact on the structural integrity and/or operation of the asset and its ancillary systems.

The dimensions of the Exclusion Zone are identified in Figure 1.

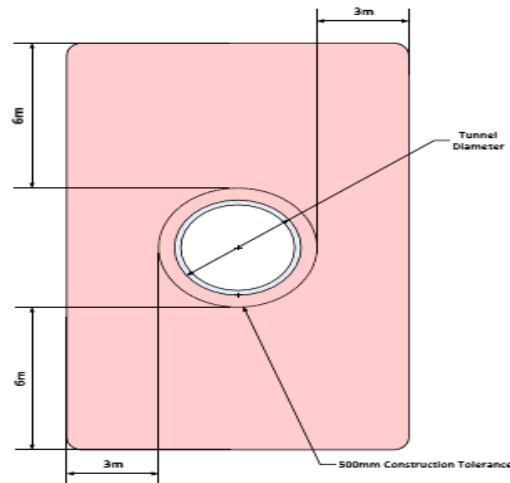


Figure 1 – Exclusion Zone Definition

2.2 Safeguard Zone

National Grid also imposes a Safeguard Zone on all 3rd parties; this aims to promote an interface between the 3rd party and National Grid with regards to any major works that have the potential to have an impact on the structural integrity and/or operation of the asset and its ancillary systems.

The Safeguard Zone considers whether any proposed structure falling within a line 45° from the tunnel invert could load the tunnel lining. This ensures that any 3rd party works that is planned to infringe on this zone, seeks appraisal and ultimately acceptance from National Grid, prior to any works taking place.

There is also a notional horizontal boundary for the Safeguard Zone which is set at 35m either side of the tunnel centreline.

The dimensions of the Safeguard Zone are identified below in Figure 2.

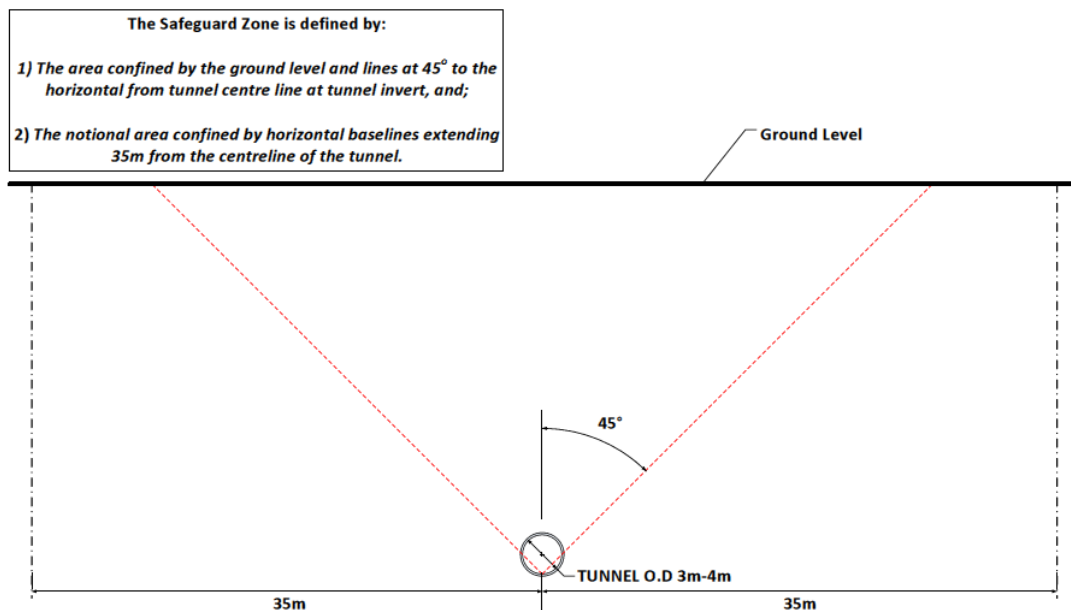


Figure 2 – Safeguard Zone Definition

2.3 Excavation Zone

There is also an Excavation Zone that needs to be considered during any 3rd party works.

The Excavation Zone is a 2.5m strip below ground level constrained by the horizontal baseline of the Safeguard Zone, where any excavation works in this area is unlikely to require any additional engineering assessment but due to the potential effects of heave on clay soils, any excavation that exceeds the 2.5m depth below ground level will require an Engineering Assessment to show that heave will not have an effect on the integrity of the cable tunnel.

2.4 Definition of Works

The definition of 'works' with regards to these zones could include, but are not limited to:

- a) Ground Investigation Works,
- b) Existing Utility Asset Maintenance or Replacement,
- c) 3rd Party Building Developments,
- d) Development and Construction of Underground Public Transport Infrastructure,
- e) Development and Construction of Utility Infrastructure,
- f) Any Development with the potential to impact the integrity and operation of the cable tunnel asset.

The designated zones shall also apply to any decommissioning, demolition or maintenance works that could affect the integrity and operation of any of the cable tunnel assets.

The combined guidance drawing for the zones identified can be found in Figure 3:

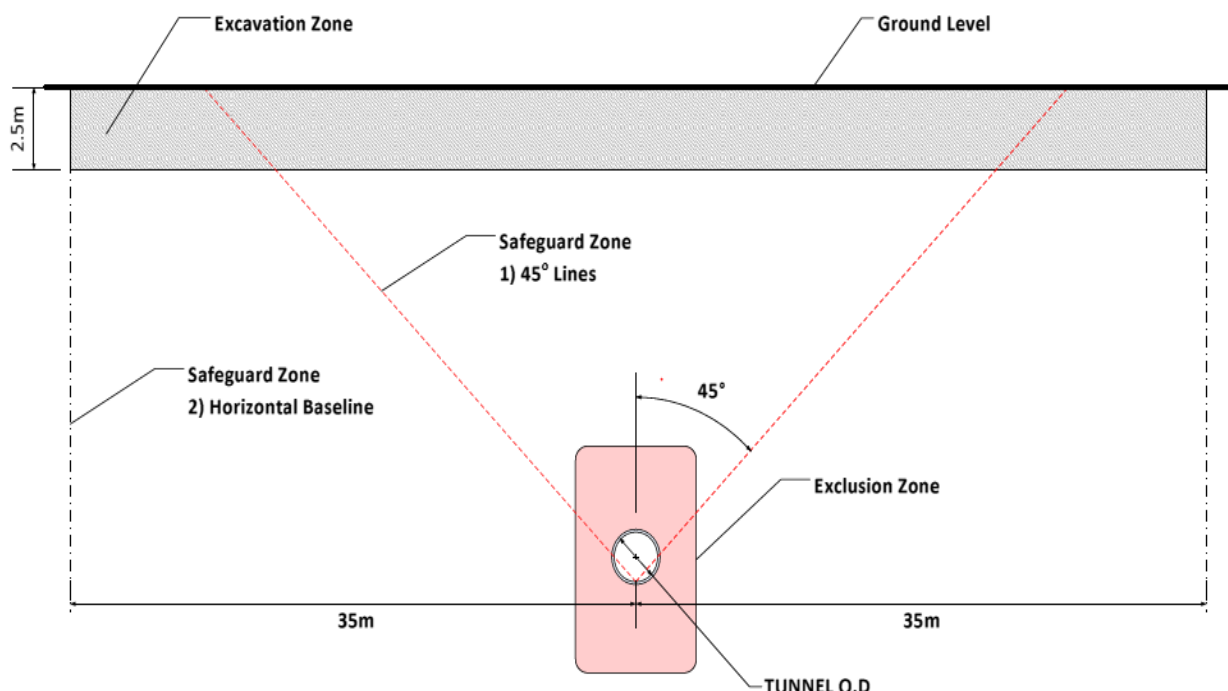


Figure 3 – National Grid Cable Tunnel Exclusion and Safeguard Zones

3 3RD PARTY DEVELOPMENT REVIEW PROCESS

3.1 3rd Party Development Submission Requirements

The basic requirement to be met by the 3rd party nominated design teams, on any structural designs, which could potentially impose loads or other actions on a NGET underground tunnel asset within 35m horizontally of the centreline of the tunnel is to provide the following:

- a) Information on the design method which the design team intend to use to ascertain the effects of the new structure foundation on the existing tunnel.
- b) A Ground Movement Assessment to establish the effect from 'greenfield' ground movements
- c) As part of initial discussion between the 3rd Party and NG, an Engineering Assessment may be required to ensure that the tunnel can withstand the increased loading, through comparison of the effects of the actual loading with those caused by the design surcharge (see Section 4).
- d) A Category I, II or III Design Check Certificate (as appropriate), provided by an independent checker, is to be issued to NGET to assure the loads on the foundations and to appraise the ground movement assessment analysis.
- e) An Approval in Principle (AiP) document containing all the information identified above to be submitted to NGET for review and comment.

Note that for 3rd party developments linked to smaller utilities infrastructure (so pipework, cables etc.) an AiP will also be required but may not require an as rigorous assessment when compared to larger developments (high rise buildings, underground tunnels, highways etc.).

3.1.1. Approval in Principal (AiP) Document

The AiP is a document to be produced and submitted by the 3rd party to National Grid to identify and explain the following:

- a) what is proposed with regards to the 3rd party development
- b) where the proposed development is in relation to NG asset(s)
- c) whether there will be any interaction with NG asset(s)
- d) where there is interaction, initial proposals for mitigation measures and design intentions
- e) any available drawings, reports or other important information relating to the proposed development
- f) the impact from the Ground Movement Assessment
- g) any Engineering Assessment(s) (if required)
- h) the justification behind not proposing an Engineering Assessment (if required)

There is no pro-forma or template for the AiP so it is expected that the 3rd party will use a sensible format and document structure.

3.1.2 Engineering Assessment

For any potential interaction with a NGET underground tunnel asset, where it has been determined that it could have an effect on the structural integrity and operation of the cable tunnel – then an Engineering Assessment will be required as part of the AiP submission from the 3rd party to justify that the engineering effects from the development are not ‘significant’ on the overall integrity of the tunnel asset.

The content of the Engineering Assessment section of the AiP will depend on the type of interaction with the tunnel asset and this can be discussed and agreed with a technical specialist from NGET Engineering and Asset Management, although due to the complex nature of tunnel design and analysis, there is high likelihood that there will be a requirement for significant non-linear dynamic analysis to demonstrate compliance.

The Engineering Assessment should also ensure that a separate 3rd party Design Check Certificate (level of design check to be agreed between 3rd party and NGET) is provided and the record of the check is included as part of the overall submission to NGET.

4 KEY DESIGN AND CONSTRUCTION CONSIDERATIONS FOR 3RD PARTIES

4.1 Surcharge Loading Constraints

4.1.1 Definition of Acceptable Surcharge Loadings

NGET will want to discuss loading or unloading from any development that could potentially load or deform the tunnel linings, and have any negative impact on the structural integrity of the tunnel asset.

The design of more recently constructed tunnels (post 2000) allows for surcharge loadings from existing buildings or, where there were no existing buildings, assumes a uniformly distributed load of 75kN/m² at ground level, based on the ground level at the time the design was undertaken.

Surcharge loading on the connecting tunnel and shaft forming the head house shall not exceed 75kN/m².

For all other existing tunnel assets, assume a uniformly distributed load of 50kN/m² at ground level, based on the ground level at the time the tunnel as was installed.

It shall be assumed for any 3rd party proposing development above National Grid tunnels, that point loading of a tunnel is not acceptable in any case.

4.1.2 Exceeding Surcharge Loadings

The surcharge allowances in Section 4.1.1 can only be exceeded if an engineering assessment of the tunnel load and deformation is produced and is acceptable to National Grid.

As part of this the 3rd party shall provide the following technical information as part of the Ground Movement Assessment and Engineering Assessment:

- a) predicted soil movements/settlement and therefore tunnel lining movement at stages of construction, loading and consolidation, including unloading for example during demolition or basement construction
- b) tunnel lining hoop stress, joint stress and bending moment changes, allowing for any segment joint lips in that location
- c) combination of hoop stress and bending moment with respect to the M-N interaction diagram
- d) maximum Radius of Curvature due to impact from development

- e) assessment of maximum cross-section distortion (presented as a %)
- f) structural assessment of bolted connections (where applicable)
- g) dimensional assessment of opening up of joints for both bolted and non-bolted lining joints
- h) verification where appropriate using semi-empirical methods

The 3rd party shall also consider and respond to the following issues with construction:

- i) stress relief and deformation of NGET tunnel assets from the boring process
- j) potential for outflow of soil into pile bore, reducing support to tunnel lining
- k) potential for concrete or support fluid flow from pile bore to NGET tunnel assets

4.2 Foundation and Borehole Constraints

Where piled foundations are required, bored piles are preferred.

Where possible, piles should be founded below the tunnel invert so that end bearing loads are transmitted below the tunnel.

The pile should be sleeved throughout to prevent load transfer via skin friction to the ground above the tunnel. Where this is not possible, any subsequent analysis will need to consider the combined effects of end bearing and skin friction (dependent on geotechnical information).

Excessive vibration near to NGET tunnel assets is unlikely to be acceptable, normally ruling out driven piling, as well as vibro-compaction and stone columns.

The precise location, depth and loading of piled foundations should be carefully specified. As part of the consultation process NGET may request advance notification of scheduled piling, and that the pile logs and test pile results be made available for review.

If NGET believes that continuing piling will or is reasonably likely to have an adverse impact on NGET tunnel assets, then NGET reserve the right to suspend the piling works until the 3rd party can demonstrate otherwise through further analysis and/or supplementary monitoring.

Those proposing boreholes should have regard to the extent of the Safeguard Zone and where necessary liaise with NGET to establish any constraints and/or monitoring requirements.

As a minimum the drilling method, diameter, proposed depth, inclination and OS coordinates of the foundation/borehole will be required before acceptance is given.

Where drilling support fluid is proposed, the fluid shall be selected to avoid any potential ingress of fluid into the nearby NGET tunnel assets, for instance from transmission of the fluid through fissures in the ground.

A representative from NGET may wish to attend site to verify site controls on location and depth – typically, notice of 24 hours will be given prior to a site visit and all effort should be made by the 3rd party to accommodate these types of requests.

4.3 Ground Movements, Vibration, Distortion and Settlement Constraints

4.3.1 Vibration

Vibration can present a risk to operation through disruption of equipment or through movement of ground or structures (ground displacement, settlement or heave).

There is an ultimate vibration limit of 30mm/sec peak particle velocity for all aspects of work in proximity to National Grid underground assets (tunnels and shafts).

If the piling methods, identified earlier in this section, are specified and the developer cannot demonstrate that the vibration does not exceed a peak particle velocity of 7mm/s at the intrados of the tunnel structure or associated auxiliary structures then a settlement and vibration monitoring regime will be required.

4.3.2 Distortion

Cross sectional distortion of the shaft/tunnel shall not exceed 0.2% of the theoretical diameter.

Maximum permissible radius of curvature of 10km.

4.3.3 Ground Movement and Settlement

Minor settlement will have occurred during the tunnelling operations associated with the installation of the majority of NGET tunnel assets, but this will have been calculated with a high level of accuracy.

The absolute deflection of any point of head house from its as built position in any direction shall not exceed 10mm and is typically anticipated to plateau after a few years.

As per Figure 3, for any large-scale excavations (car parks, basement areas etc.) that remove a depth of soil greater than 2.5m, the 3rd party must liaise with NGET to establish whether there is a requirement to provide calculations for review and acceptance by NGET.

The calculations should quantify any ground movements that may occur across the excavated area - as well as satisfying NGET that the integrity of the tunnel asset is maintained.

NGET would mainly be concerned about the potential for heave, certainly in the various clay strata in South East England but will also require information regarding settlement during and post construction works.

NGET does not offer the right of support nor does it accept liability for any settlement, damage, noise or vibration emanating from the normal operation or maintenance of any tunnel asset.

5 SURVEYING REGIME FOR 3RD PARTY WORKS

5.1 Tunnel Line and Level Survey

Prior to any detailed planning and design works commencing in relation to a 3rd party development, NGET can provide indicative tunnel locations from the as-built drawing records for tunnel assets and any associated structures (shaft, adits, access points etc.) but these should not be relied upon for 3rd party planning/design development – particularly in relation to development of foundation and structural layouts.

Positive identification via a specific tunnel survey shall be carried out by the 3rd party, this should be scoped to ensure an accurate determination of the line and level of the affected tunnel asset. This can then inform accurate locations of the Exclusion, Safeguard and Excavation Zone(s).

5.2 Baseline and Post-Construction Condition Surveys

Prior to any construction works in proximity to a NGET tunnel asset, an internal baseline condition survey of the tunnel shall be carried out. The scope of the survey should be agreed between the 3rd party and NGET – this will include the agreed chainage to be affected by the proposed development – but ultimately the baseline condition survey will inform future comparisons as a result of subsequent condition surveys.

A post-construction condition survey shall also be carried out – and where there are any either new or worsening defects identified as part of the survey and these can be directly attributed to impact from any construction works associated with the 3rd party development, these should be rectified by the 3rd party at their expense.

The scope of the surveys shall be focused around a visual examination, covering the affected tunnel chainage length – identifying defects by exception and providing a record of the overall condition of the tunnel for review by NGET.

Interim condition surveys may be required subject to the requirements of the overall asset protection strategy.

6 MONITORING REGIME FOR 3RD PARTY WORKS

It may be necessary for a 3rd party to implement a monitoring strategy for a NGET tunnel asset during certain works.

For developments above, below or near to tunnels the developer will agree with NGET whether tunnel monitoring is required and, if so, to agree a monitoring regime.

An Asset Monitoring Plan shall be submitted by the 3rd party to NGET for review and acceptance prior to commencing any works in proximity to the NGET tunnel asset.

A suitable RAG (Red/Amber/Green) trigger level status should be proposed as part of the Asset Monitoring Plan with corresponding action plans – including provision for emergency response, should settlement/vibration exceed the red trigger level(s).

Frequency of monitoring readings and the method of data provision to NGET shall be agreed prior to commencing any monitoring works and included as part of the Asset Monitoring Plan.

Monitoring measures will depend upon the predicted settlement, increase in tunnel stresses and construction methodology and may include:

- a) a review and subsequent monitoring of cable support structures (including fixtures) including vertical and horizontal alignment
- b) vibration monitoring for foundation/tunnelling works in close proximity to the NGET tunnel asset
- c) pre-construction and post-construction three-dimensional survey using laser or fixed targets (also during the works if for an extended period) to identify the radial and longitudinal deformation profile changes of the NGET tunnels during the works
- d) monitoring equipment recording movement of tunnel lining in real time. This will need to be in place well before loading (to allow a stable set of readings to be taken) and continue until soil movement is largely complete or until it is clear that the settlement has matched the predictions
- e) monitoring of adjacent structures such as retaining walls forming basements close to the National Grid tunnels so that displacements of the wall are monitored at source

and may be able to be correlated with displacements of the nearby National Grid tunnels

7 OPERATIONAL ACCESS TO NGET TUNNEL ASSETS

Where a 3rd party or one of their nominated suppliers may require access to a NGET asset for either survey or monitoring-related activities - requests for access should be directed through National Grid Plant Protection in the first instance, with ongoing involvement from NGET technical and operational staff as required.

Access to NGET tunnels may require considerable input and support from NGET Operations staff to ensure safety from the system is maintained for all parties involved therefore the timeline for access for monitoring activities cannot be advised in general – and will be discussed on a case-by-case basis.

The 3rd party will also have to provide a safe system of work for review and acceptance by NGET Grid Operations before access to the underground tunnel can be granted – as well as detailed information about any equipment that will be used for monitoring activities.

8 NGET ASSET PROTECTION AGREEMENT AND RECOVERING ‘REASONABLE COSTS’

There may be a requirement for the 3rd party to enter in a legal undertaking with NG that covers the protection of the NGET asset(s) in relation to the 3rd party's proposed development – this is in the format of a legally binding Asset Protection Agreement (APA).

This is required should there be potential for the development to cause significant impact on the tunnel asset – this could be a combination of excessive settlement, increase in stress of the tunnel lining and/or impacts from construction works associated with the development that could impact the operation of the tunnel and equipment contained within.

NGET is likely to require at least ‘in principle’ agreement on the undertaking of the APA before engagement with the 3rd party in consideration of their proposed works and the agreement to reimburse ‘reasonable costs’ associated with providing advisory/technical/operational services to the 3rd party.

NGET use a standard template for Asset Protection Agreements which can be reviewed and discussed once an ‘in principle’ agreement has been reached between the 3rd party and NGET.

Technical Guidance Note 287

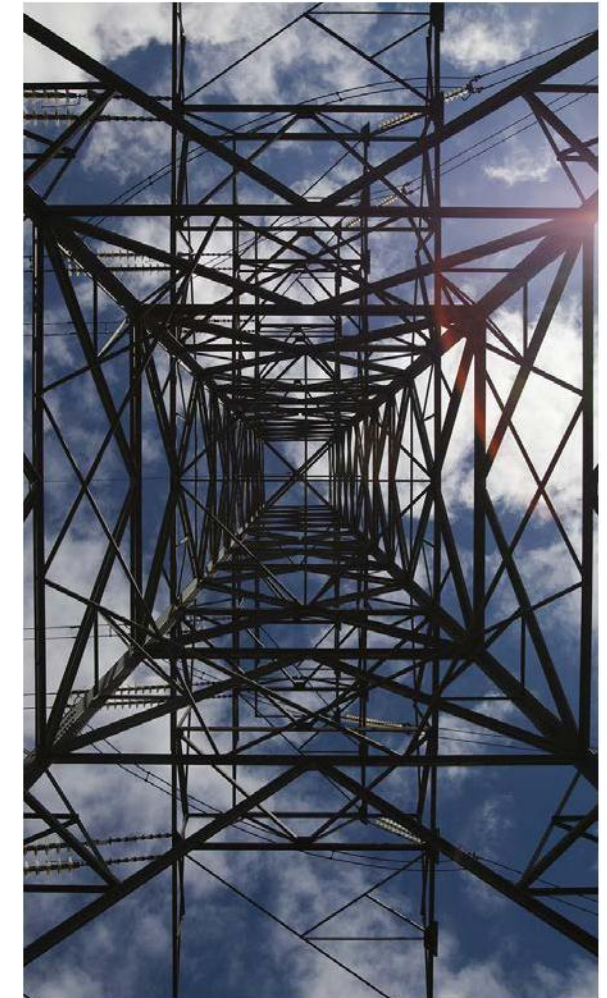
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

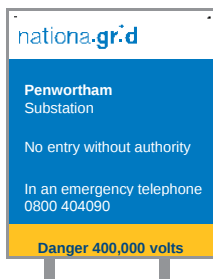
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

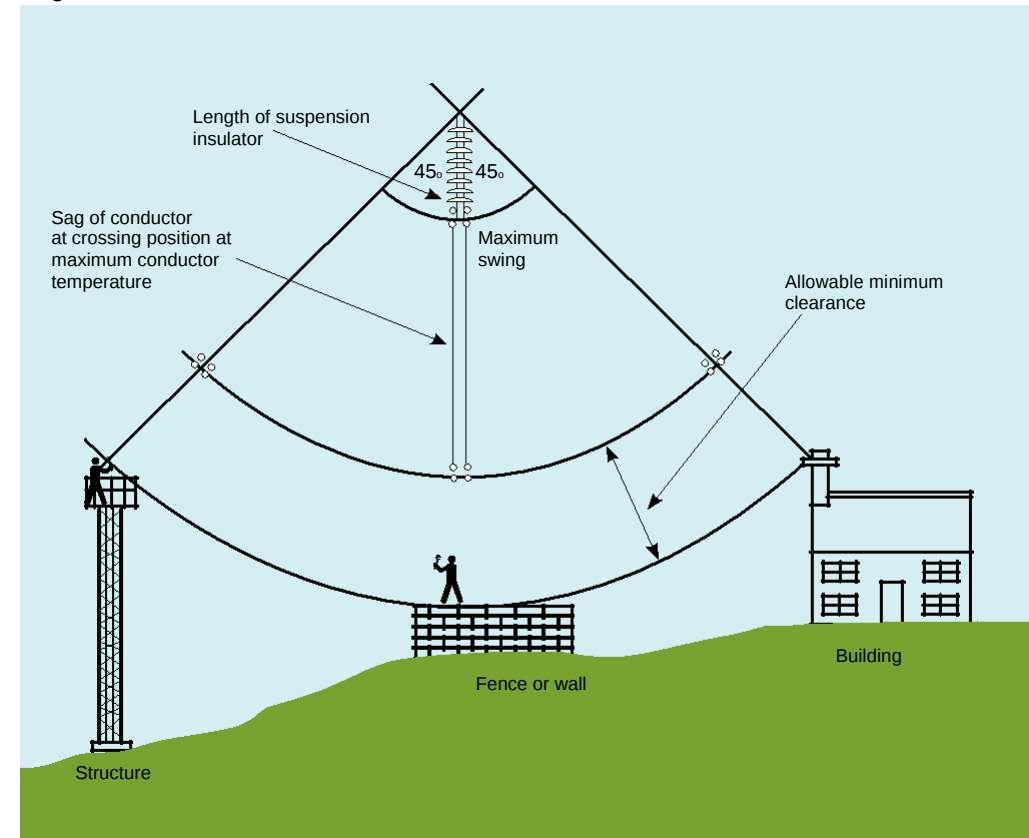
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be laid in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

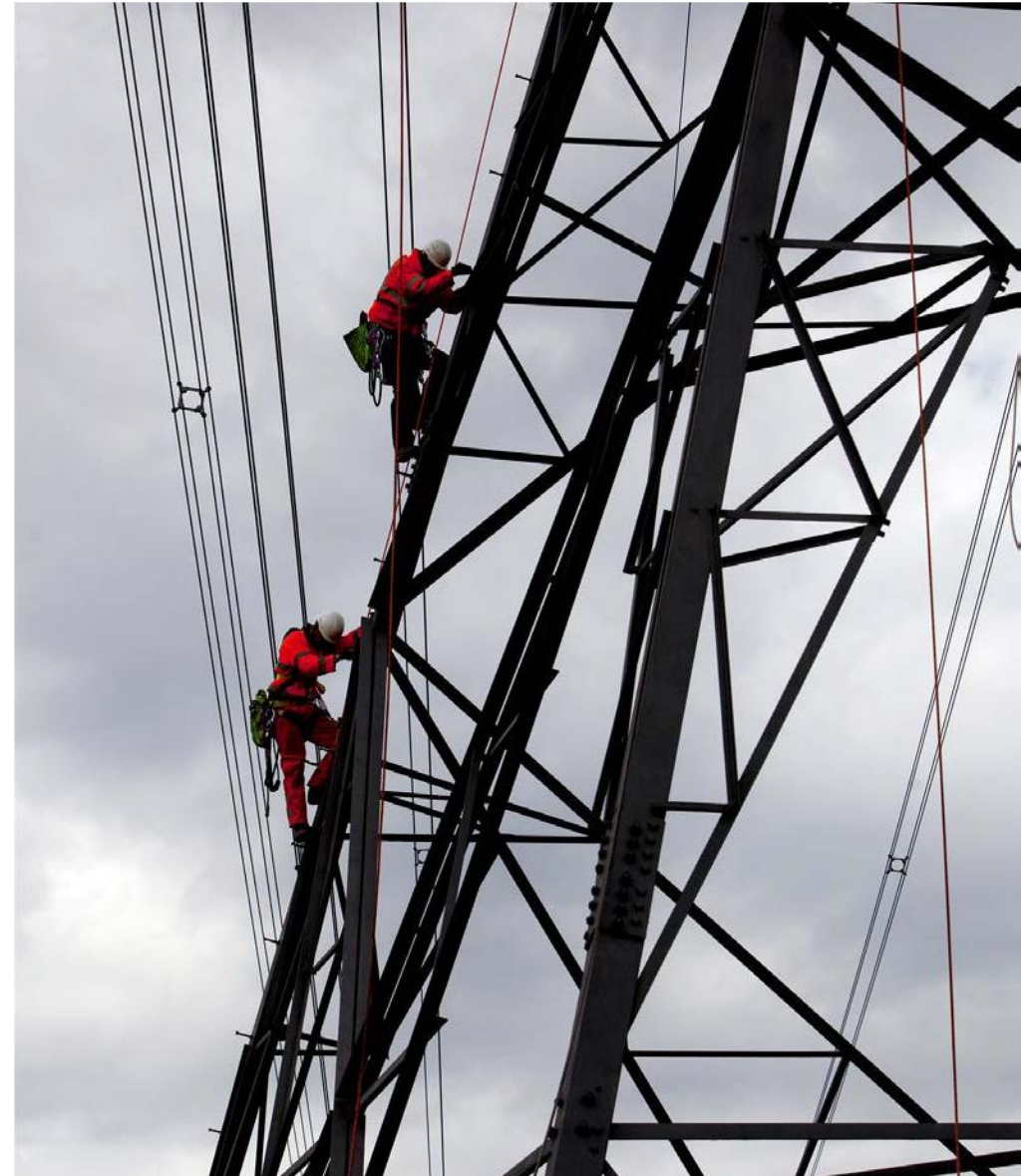
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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previous page

Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (*as outlined in ENA TS 43-8*).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

*The minimum distance that
should be maintained from
National Grid assets when
quarry blasting*

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

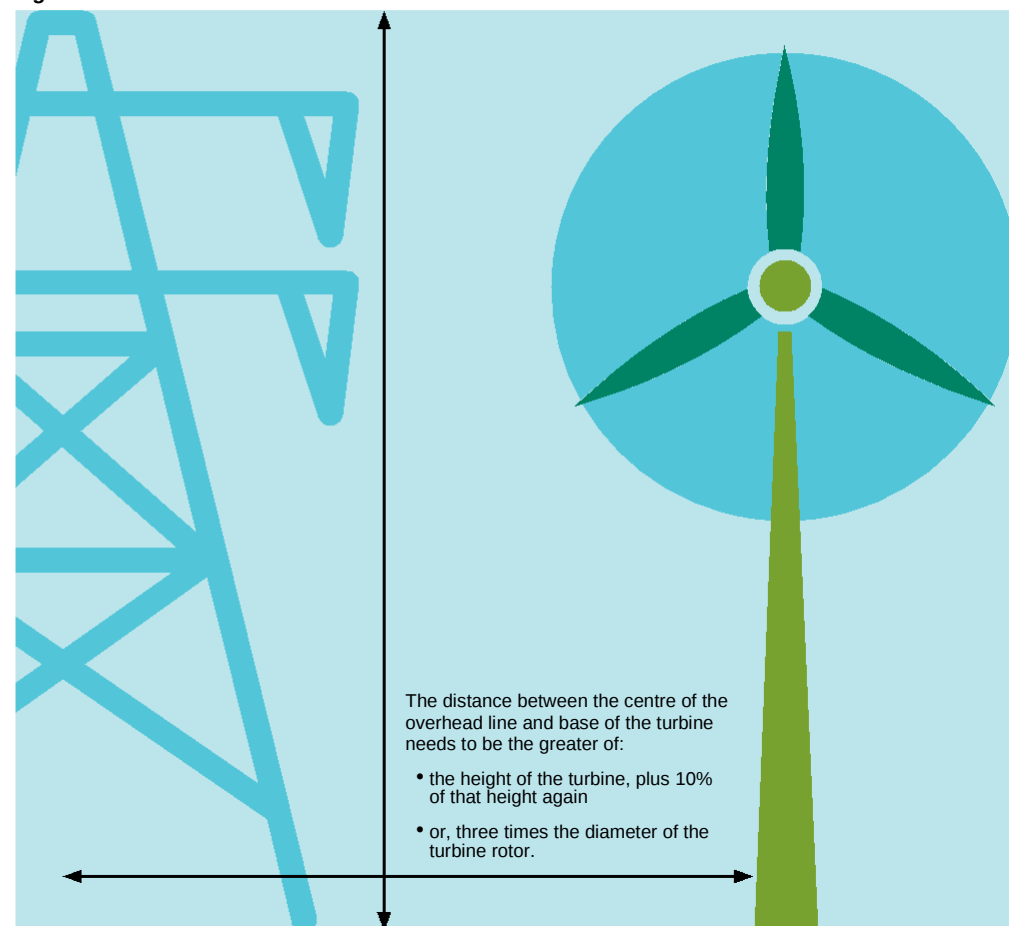
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

Section continues on next page »

Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

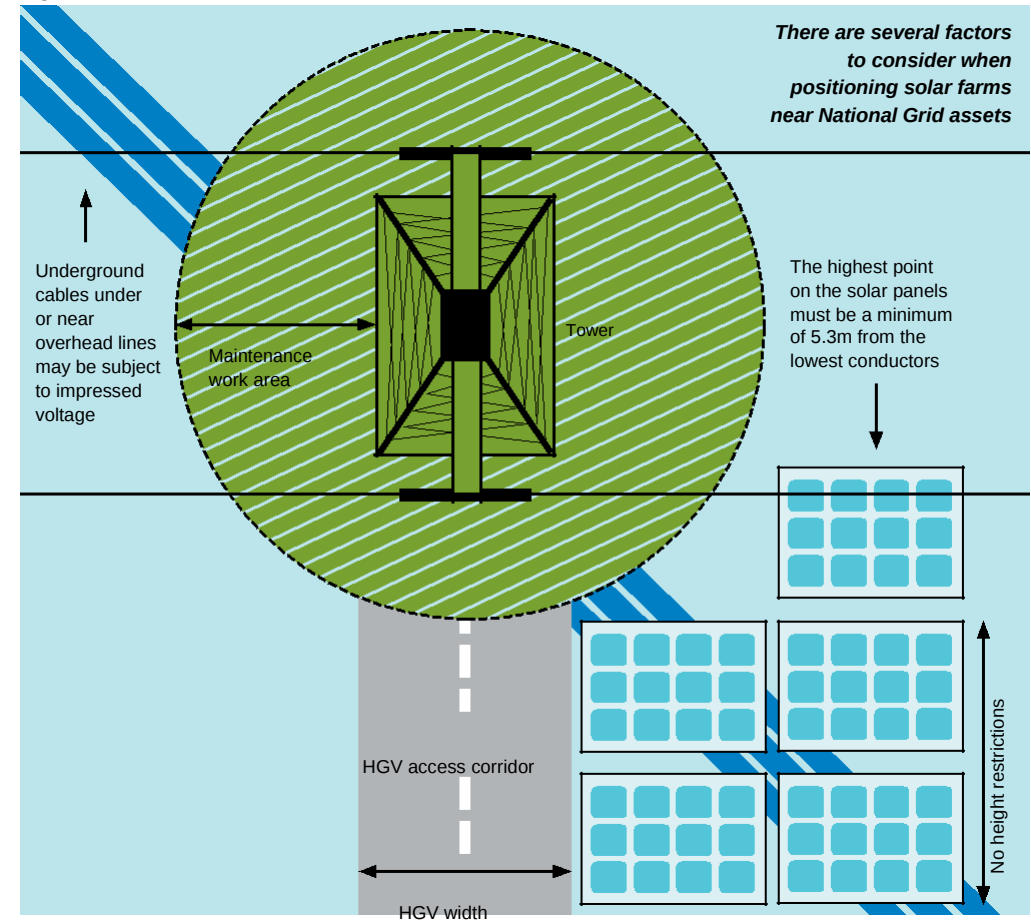
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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(2) Vertical Axis indicates meters above OS GB Datum 2m distance between minor marks/box

X & Y Co-ordinate of tower base. Route & Tower Number Tower Type

Span Length (m)

Height of Conductor Attachment Point Above OS GB

Bottom Conductor Displayed at Max Sag

5.3m Clearance line at Max Orange dashed line

7.3m Clearance line at Max Sag Blue dashed line

Lidar Data showing Buildings, Roads, Vegetation etc.

5.3m Clearance line at Max Swing Orange dashed line

North Arrow

OHL Plan View & Downward Looking Imagery

Section Operating Voltage, Conductor Type, Conductor Name, Bundle Configuration & Sagging Condition

(1) Vertical & Horizontal Scale – can be used in conjunction with a ruler to take measurements.

IMPORTANT: NOTE HORIZONTAL & VERTICAL SCALES DISTANCE (1) MAY DIFFER FROM HORIZONTAL & VERTICAL GRID MARKS SCALE/BOX DISTANCE (2).

Generic Data Origin of Drawing

Key for LIDAR Data

ENA43-8 Clearance to Objects at 400kV

Swing & Sag Diagram

NG Drawing Specific Data

National Grid Overhead Line Profile

Profile Description:
This profile is derived from the use of LIDAR data and shows the position and status of the power line at the time of survey. Please note that ground levels may have changed since the survey date.

As the amount of power increases in the line the conductors will sag and become more sagging. Greater sag. A computer model has been applied to show the conductor at the maximum sag. Please note that on an average day the conductors may not be at their maximum sag and their height above ground is likely to change.

The profile shows the line current voltage. Any construction under the line should allow for the likely possibility of upgrading of the line from 132kV to 275kV or 275kV to 400kV. Any permanent structures should adhere to the increased clearance.

It remains the responsibility of the third party to ensure the safety clearance is met by their proposed operations by using the bottom conductor attachment points as reference benchmarks.

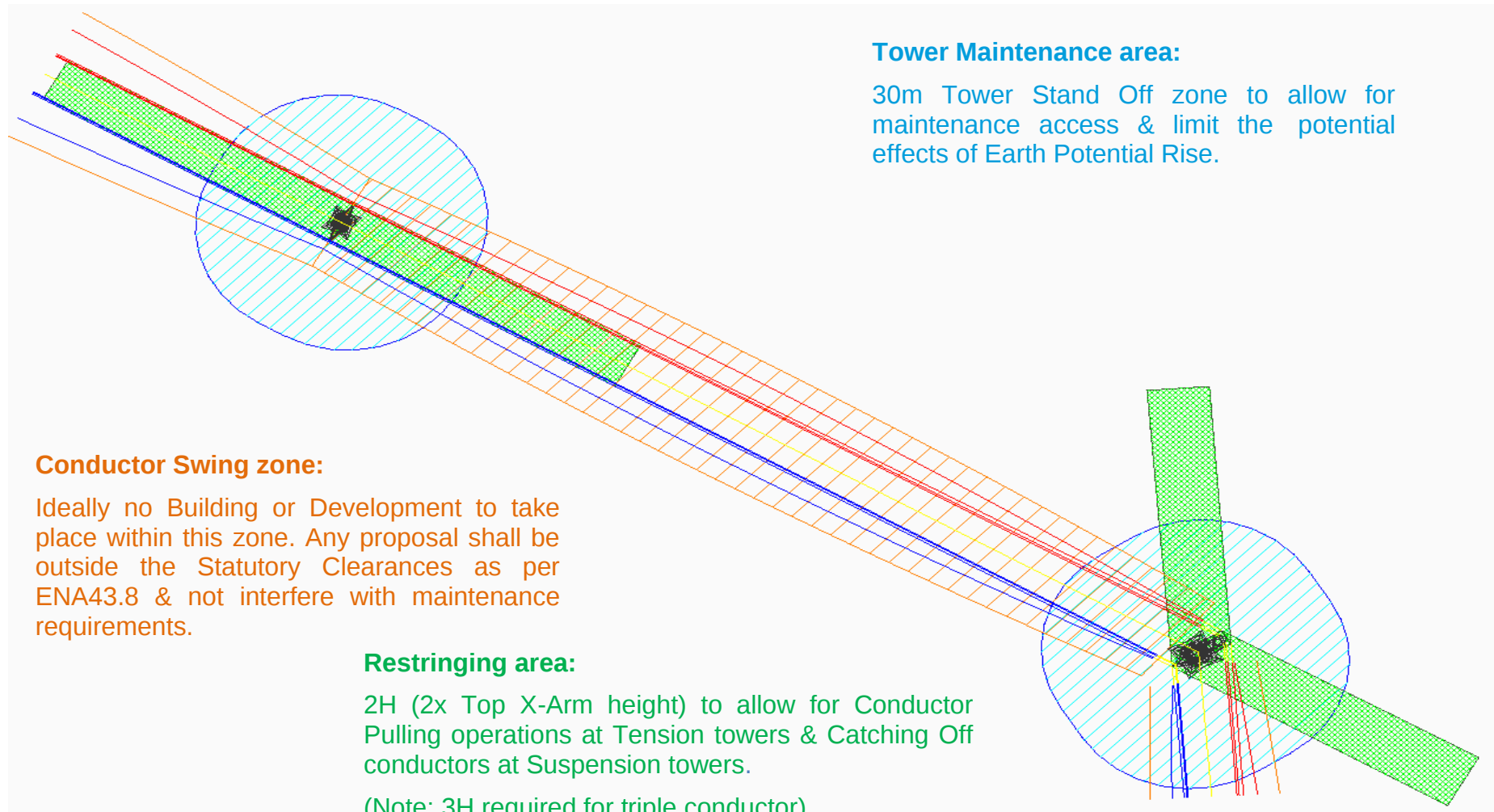
Drawing Key:
The following clearances are derived from the Energy Networks Association Technical Specification 43-8.

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226. Minimum Clearance	227. Minimum Clearance	

15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



From: [REDACTED]
Sent: Wednesday, August 05, 2026 13:44
To: London Strategic Heat Main
Cc: Planning SE; 'transportplanning@dft.gov.uk'; Spatial Planning; Diana Ngobi; Martin Hempell
Subject: Fw: 040826 EN0710009 National Highways Response to Proposed application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development) – EIA Scoping consultation

You don't often get email from [REDACTED]. [Learn why this is important](#)

For the Attention Of: Planning Inspectorate (Katherine King)

Consultation: Proposed application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development) – EIA Scoping consultation

Your Ref: EN0710009

Our ref: NH/26/17043

Dear [REDACTED]

Thank you for your correspondence of 7 July about the EIA scoping consultation for the proposed London Strategic Heat Main.

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the A2 dual carriageway outside of London and M25 motorway.

We understand that the project would transport surplus low-carbon heat, to local heat distribution networks across London that would provide heating and hot water to homes and businesses. The heat transmission main would capture surplus heat from industrial sources – initially Cory's energy from waste facilities at the Riverside campus in Belvedere - which would otherwise be lost. This heat would be transported via underground pipework, acting as a 'trunk' to serve areas of high heat demand in London. At various points along the heat transmission main, local heat distribution networks will be able to connect and heat will be transferred to homes and businesses.

Broadly speaking, the main artery of the project would include a pipeline running east to west from Belvedere in Bexley on the south side of the Thames, crossing under the river to Westminster and Kensington and Chelsea. There would be connections along the route at various points, from industrial sites along the Thames and would provide heat in 11 boroughs.

At its closest point, the project would be over 7km by road from the SRN (the A2 at the London boundary). Upon completion it would not be expected to generate additional traffic volumes other than routine maintenance and operational matters along its route. Therefore, the EIA scoping opinion and Environmental Statement do not raise any concerns and we have no further comments to make.

We look forward to participating in future consultations. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk.

Regards,



 Spatial Planner

National Highways Limited

Spatial Planning Team

Building 1000 Cathedral Square Guildford Surrey GU2 7YL

Registered in England and Wales No. 9346363

Tel: [REDACTED]

<https://nationalhighways.co.uk>

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Three Snowhill, Snowhill Queensway, Birmingham, B4 6GA

Consider the environment. Please don't print this e-mail unless you really need to.

Date: 03 August 2026
Our ref: 552785
Your ref: EN0710009



LondonStrategicHeatMain@planninginspectorate.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear [REDACTED]

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: London Strategic Heat Main

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 07 July 2026, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. We have no major concerns about the scope of the assessment.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

For any further advice on this consultation please contact the case officer Jonathan Shavelar and copy to consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]
Senior Officer
Thames Solent Team

Annex A – Advice related to EIA Scoping Requirements

1 General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development.
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors).
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- An outline of the structure of the proposed ES.

From the Scoping report provided, Natural England consider that these general principles **will** be appropriately addressed through the EIA process.

2 Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

The scope of an in-combination assessment should include plans and projects which are 'live' at the same time as the assessment being undertaken. These can potentially include:

1. The incomplete or non-implemented parts of plans or projects that have already commenced;
2. Plans or projects given consent or given effect but not yet started;
3. Plans or projects currently subject to an application for consent or proposed to be given effect;
4. Projects that are the subject of an outstanding appeal;
5. Ongoing plans or projects that are the subject of regular review and renewal;
6. Any draft plans being prepared by any public body; and
7. Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application.

3 Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available [here](#).

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's Site of Special Scientific Interest (SSSI) Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4 Biodiversity and Geodiversity

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their [website](#).

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG).

The Local Nature Recovery Strategy for London is referenced in section 8.4.1 of the EIA Scoping Report. We advise that the development's BNG and any relevant mitigation or enhancement opportunities take account of the information within the LNRS.

5 Designated nature conservation sites

5.1 International and European sites

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

European site conservation objectives are available [here](#). An appropriate assessment will be required where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent may help reduce delays in the process. More information on Evidence Plans is available [here](#).

Paragraph 6.4.16 of the Scoping Report sets out the ecological receptors within the ecological study area and includes Wimbledon Common Special Area of Conservation (SAC), Lee Valley Special Protection Area (SPA) and Ramsar, Richmond Park SAC and Epping Forest SAC.

Natural England are aware that the Applicant has published a draft Habitats Regulations Assessment (HRA) Screening document and we will seek to review this as part of our Discretionary Advice Service (DAS). We welcome the detail provided in figure 8-1, showing ecologically designated sites from international to local.

5.2 Nationally designated sites

Sites of Special Scientific Interest

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on SSSIs and interest features can be found at www.magic.gov.

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Table 8-4 of the Scoping Report shows the Nationally designated sites within the ecological study area and appears to include all relevant Sites of Special Scientific Interest, but please note we have not been able to carry out an exhaustive desk study.

5.3 Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local groups. Where impacts cannot be avoided, the ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

5.4 Air Quality

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

Standing advice on air pollution and development is also available [here](#).

Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling necessary.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2 Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src/ Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here . Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3 Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling

			The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u> . If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds . If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.
Appropriate Assessment (AA) for habitats sites	6	The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process.	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration . The assessment of such measures should be supported by evidence.

	Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.
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Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km

Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

6 Protected Species - Species protected by the Conservation of Habitats and Species Regulations 2017 (as amended) and by the Wildlife and Countryside Act 1981 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#). The areas likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) contains further information on the LONI process.

7 Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important

habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

8 Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 5.4.16 of National Policy Statement EN-1 sets out the government's commitment to maintain and enhance the existing area of ancient woodland and in paragraph 5.4.55 that development should be refused where there are impacts to irreplaceable habitats unless there are 'wholly exceptional reasons'.

The ES should include details of where impacts might occur from this development proposal on the local ancient woodland and how these can be mitigated. Information that might require consideration to inform this work includes:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal, likely to include detailed habitat and species surveys;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species; and
- Full details of any mitigation or compensation that might be required.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees. Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

9 Biodiversity Net Gain

The government has recently published [their response](#) to consultation on biodiversity net gain (BNG) and provided updated [guidance](#) in June 2026.

This announcement and guidance confirms that the mandatory requirement to achieve BNG will apply to all NSIP applications made on or after 2 November 2026.

10 Nationally designated landscapes

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

11 Connecting people with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development. It should assess the scope to mitigate for any adverse impacts.

Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

From: BeforeYouDig
Sent: Wednesday, August 05, 2026 13:56
To: London Strategic Heat Main
Cc: BeforeYouDig
Subject: Fw: FW: EXT:EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

Good morning

NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.

The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines.

Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.

NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.

If you give specific site locations, we would be happy to provide gas maps of the area which include the locations of our assets.

(In terms of High Pressure gas pipelines, the routes of our MAHP’s have already been lodged with members of the local Council’s Planning Department)

Kind regards,

[REDACTED]

Administration Assistant

Before You Dig

Northern Gas Networks

1st Floor, 1 Emperor Way

Doxford Park

Sunderland

SR3 3XR

www.northerngasnetworks.co.uk

facebook.com/northerngasnetworks

twitter.com/ngngas



From: London Strategic Heat Main

<LondonStrategicHeatMain@planninginspectorate.gov.uk>

Sent: 07 July 2026 10:50

To: London Strategic Heat Main <LondonStrategicHeatMain@planninginspectorate.gov.uk>

Subject: EXT:EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

By Email to LondonStrategicHeatMain@planninginspectorate.gov.uk

London River House
Royal Pier Road
Gravesend
Kent DA12 2BG
United Kingdom
Tel: +44 (0)1474 562200
Web: www.pla.co.uk

4 August 2026

Dear [REDACTED]

Proposed application by Cory Environmental Holdings Limited for an Order granting Development Consent for the London Strategic Heat Main – Scoping Consultation

Thank you for your letter dated 07 July 2026 regarding the scoping consultation for the London Strategic Heat Main project (“the proposed development”).

For information, the Port of London Authority (“PLA”) is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. The PLA’s statutory functions include responsibility for the river’s conservancy, including the power to dredge (and consent third party dredging) and to improve the river, undertaking hydrographic surveys and managing public navigation, ensuring navigational safety and controlling vessel movements within its statutory limits. The PLA’s area of jurisdiction and regulatory powers are set out in the Port of London Act 1968 and its consent is required for the construction and retention of all works in, on and over the river’s mean high water mark.

It is understood that Cory Environmental Holdings Limited are proposing to construct, operate and maintain a heat transmission network to transport low carbon heat and potentially cooling, to up to approximately 650,000 homes in London. It is unclear to the PLA whether the infrastructure required to supply end user cooling is the same as that is required to supply heat. If additional or different infrastructure is required to enable cooling, then this will need to be clearly set out in the Environmental Statement (“ES”) and the reasonable worst case assessed. For example, it should be clarified if the reference to a maximum of two pipelines refers to one heating and one cooling tunnel or whether there would be two heating tunnels and if cooling is

proposed then there would be four tunnels. The maximum distance between the tunnels should also be clarified.

Scoping Boundary

The scoping boundary extends from the London Boroughs of Barking and Dagenham and Bexley in the East to the London Borough of Lambeth and the Royal Borough of Kensington and Chelsea in the West. Along its route the river would be crossed up to nine times. At this stage options are presented and therefore the number of crossings of the river may reduce. As a general point, the red line boundary for the proposed development should be the minimum necessary to deliver the scheme. It should be refined as the project progresses. It will be necessary to understand any potential limits of deviation and for the reasonable worst-case scenario to be assessed in the ES. For example, a shallow tunnel, which the PLA is unlikely to support, would potentially require scour protection to be placed in the river to protect the tunnel. Clearly this would have different environmental impacts from a deeper tunnel that designs out the need for scour protection.

In addition, the general impression from the Scoping Report is that the Applicant has concluded that because the project is a tunnel beneath the river Thames there are no impacts to the river. With the level of detail provided, the PLA cannot agree with this approach and the ES must therefore properly consider potential impacts on the river and river users. Whilst not an area of expertise within the PLA, it might for example be necessary to consider for a shallow tunnel the implications of heat transfer from the tunnel to the surrounding riverbed and even the river itself.

Whilst more detailed plans are required and the plans need to be overlaid on a PLA chart, the proposed development would be in close proximity to essential river infrastructure including safeguarded wharves, piers, road and rail bridges, PLA and third party moorings, anchorage/ship tier, outfalls, pipelines, cable tunnels, the London underground, and the nationally significant Thames Tideway Tunnel. With the level of detail provided it is not clear what the impacts of the proposed development would be on this essential infrastructure and therefore there could be impacts to the river and river users if for example existing infrastructure needs to be removed or relocated or can no longer function in the way that it currently does. As

an example, a shallow tunnel under a safeguarded wharf could prevent the berth from being dredged to bring in larger vessels. Once more detailed plans are available it may be necessary to have a marine infrastructure chapter in the ES to detail out the marine infrastructure that is located within the study area and to assess the proposed developments potential impacts on this infrastructure. To assist in understanding the potential impacts, the PLA would welcome shapefiles of the proposed route.

The Scoping Report advises at paragraph 2.5.1 that where the project crosses the river Thames it will be a minimum depth of 5m below the riverbed and that this has formed the assumption for the Scoping Report, but that subject to further analysis, the crossings are anticipated to be constructed at depths of between 20-30m below the riverbed with the depths of river crossings being detailed in the ES. Clearly the depth of the tunnel below the riverbed is of critical importance and the Applicant needs to consider future riverbed levels as well as existing bed levels. This approach has been taken for all recent tunnels consented through DCO's (see Lower Thames Crossing and Silvertown Tunnel) and all recent cable projects consented through DCO's (see Five Estuaries and North Falls). The PLA and the Applicant must agree riverbed levels to be safeguarded at each location where the tunnel would cross the river (with 0.5m over dredge allowance) to allow for the future growth and development of the UK's largest Port and buffer zones must be agreed to allow for channel migration. The depth of the tunnel must all be referenced to a datum.

Reference is also made at paragraph 2.5.22 to the proposed development possibly supporting other utilities, such as third party cables. This needs to be clearly set out in any ES.

There are two locations on Albert Embankment and Chelsea Embankment where the red line boundary encroaches into the river, this encroachment into the river should be explained and assessed in the ES.

Comments on the various ES chapters are also provided below:

Approach to Alternatives

The PLA is supportive of a chapter which sets out the alternatives considered and the main reason(s) for selecting the proposed development. The PLA would recommend specific consideration is given to why the project does not propose to follow the route of the river Thames in a similar way to the Thames Tideway Tunnel.

Marine Archaeology

Whilst the PLA would defer to Historic England, it is questioned how with multiple crossings under the river that it can be concluded at this stage that there are no impacts to marine archaeology.

Marine Environment

It is noted that there are no planned intakes or discharges to the river during construction or operation. Should this change then it will be necessary to assess the impacts in the ES.

Paragraph 13.5.3 states that river crossings are located a considerable depth below the riverbed. The PLA does not consider 5m to be considerable and would class this as a shallow tunnel. It is also stated that there are no works within the riverbed and no physical disturbance of the riverbed, but the up to nine river crossings would be in the riverbed and there are two locations where the red line boundary appears to extend to the foreshore of the river. Given that the tunnelling methodology has yet to be decided, is 5m below the riverbed sufficient to prevent disturbance (vibration etc.)?

Socio-Economics

It is noted that direct effects within the DCO Order Limits and adjacent land are assessed. At this stage understandably the PLA has not been able to fully assess impacts on the river and river users, but the ES should assess this and provide any necessary mitigation. As set out above there are multiple types of river infrastructure that could be impacted depending on the depth and alignment of the tunnels crossing the river.

Transport

The PLA is very surprised that use of the river during construction already appears to have been ruled out with it being stated in the Scoping Report that “*No river transport will be used.*”

The list of relevant local and neighbourhood policy includes the London Plan, but there is no reference to policy SI15 Water Transport and I “*Development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases.*”

Multiple DCO’s have utilised the river for the transport of construction materials and waste to and from development sites and no justification has been provided for not using the river for this Nationally Significant project. The primary approach to project cargo logistics for the construction of the Thames Tideway Tunnel was based on the use of the River Thames, with over six million tonnes of cargo (over 90%) transported during the construction period, including tunnelling spoil, tunnel lining segments, steel reinforcing and bulk aggregates. As a broadly comparable tunnel scheme, the differing approach adopted by the Applicant is puzzling. Consideration of river use should include direct to site and sourcing materials through the supply chain by committing to use of safeguarded wharves to supply materials such as concrete.

The PLA is supportive of the production of a Framework Construction Logistics Plan (“CLP”). The PLA would recommend that this gives specific consideration of the role that water transport could play in reducing the number of HGV movements associated with the project.

The Framework Construction Worker Travel Plan (“CWTP”) should consider river bus as a mode of transport for construction workers.

Ground Conditions

Chapter 9 identifies that the EIA Scoping Boundary is in an area of high bombing density and that a preliminary UXO Risk Assessment will be obtained and reviewed for the Preliminary Risk Assessment (“PRA”). However, the subsequent section on the Phase 1 PRA (paragraphs 9.6.2

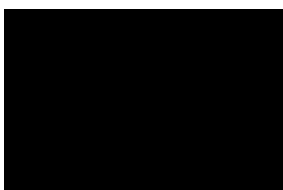
to 9.6.4) does not identify that the PRA report will contain details in relation to UXO and it would therefore appear that UXO in the river is not considered.

Appendix 12-1 Scoping of Major Accident and Disaster Risks advises that the Framework CEMP will outline the procedures required if a UXO is found during construction. Further assessment and detail will be presented within the ES, as set out within Volume 1, Chapter 9: Ground Conditions of the EIA Scoping Report. This will be of particular importance to the PLA as it could have implications for river users and river use.

The commitments register says no in river geotechnical surveys are planned. Whilst data is available from other tunnel schemes and it's generally understood that composition of the subsoil moves from clay in the west to chalk in the east, but without these surveys how will the data on riverbed conditions be obtained so the subsoil material(s) to be tunnelled is understood and project cargo logistics properly planned?

I hope the above is of assistance.

Yours sincerely



Deputy Director of Planning and Development

Tel: +44 (0) [redacted]

Email: [redacted]@pla.co.uk

From: [REDACTED]
Sent: Wednesday, August 05, 2026 13:55
To: London Strategic Heat Main
Cc: [REDACTED]; QPCC Planning
Subject: Fw: Scoping Report in London Strategic Heat Main Project

You don't often get email from [REDACTED]@queensparkcommunitycouncil.gov.uk.
[Learn why this is important](#)

Queen抐 Park Community Council has no comments to offer at this stage of the project.

[REDACTED]
Admin Support Officer

[REDACTED]

Sent from my iPad

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Queen抐 Park Community Council is committed to ensuring the security and protection of personal information. Our data protection practices are compliant with GDPR and other relevant regulations. If you have any questions about our data protection practices, please read our [Privacy Statement](#) or contact our Data Protection Officer (ProperOfficer@queensparkcommunitycouncil.gov.uk).

Development Management Delegated Report



Directorate of Place and Growth

The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

Case Ref No:	26/2040/K
Application Type:	Consultation by other Borough/LDDC
Location:	Riverside Campus in the London Borough of Bexley, crossing Greenwich (RBG), Lewisham (LBLe), Southwark (LBS), Lambeth (LBLa) and City of Westminster (CoW).
Ward:	
Proposal:	Statutory consultation on a Proposed application for Development Consent Order under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) Regulations 10 and 11 for the London Strategic Heat Main (the proposed development).

Recommendation	Raise No Objection		
Expiry Date	04/08/2026	EOT	

Case Officer		Date:	03 August 2026
Report Agreed By		Date:	
Authorising Officer's Signature		Date:	

Listed Building:	<u>No</u>	Flood Zone	N/A
Conservation Area:	N/A		
CIL Liable	<u>No</u>	LDD	

Site Notice		N/A			
Press Notice		N/A			
Objections		Support		Comments	

Case Reference:

26/2040/K

Location:

Riverside Campus in the London Borough of Bexley, crossing Greenwich (RBG), Lewisham (LBLe), Southwark (LBS), Lambeth (LBLa) and City of Westminster (CoW).

Description of Development:

Proposed application for Development Consent Order under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) Regulations 10 and 11 for the London Strategic Heat Main (the proposed development).

Proposals (in detail):

The development proposes to construct, operate, and maintain a heat transmission network known as the London Strategic Heat Main (SHM). The London SHM will transport low carbon heat in the form of pressurised water initially from anchor heat sources at Riverside Campus (located in Belvedere in the London Borough of Bexley) to areas of high heat demand across London. Riverside Campus in Bexley incinerates residual waste and significant waste heat is available from this incineration process.

The Proposed Scheme would recover, store and efficiently transport the waste heat from these anchor sources to heat users along the London SHM route. As well as supplying end user heating, the London SHM may also be used to supply end user cooling. The submissions set out that the development has the potential to provide heat to the equivalent of up to approximately 650,000 homes.

The London SHM comprises of a Transmission Trunk Main and a series of Transmission Branches. Existing and emerging heat distribution networks and additional heat sources will be able to connect along both the Transmission Trunk Main and Transmission Branches. The London SHM will be supported by ancillary infrastructure and landscaping, together referred to as the Proposed Scheme. In summary, the key components of the Proposed Scheme include:

- a) an underground pipeline network, comprising the Transmission Trunk Main and a series of Transmission Branches;
- b) Maintenance and Access Points (MAPs) to the underground pipeline network,

including pumping stations and connection apparatus for heat distribution networks (see Figure 1 below);

- c) thermal storage infrastructure located at the eastern extent of the Proposed Scheme, close to Riverside Campus in Bexley and/ or co location at MAPs;
- d) connection to electrical supply either from the Riverside Campus or the wider electricity distribution network;
- e) new heat recovery system infrastructure at the Riverside Campus; and
- f) any required ecological, landscaping and public realm works.



Plate 2-3: Example of Above Ground Infrastructure – Pumping Station Kiosk

Figure 1: Example image of an above ground maintenance station which might be similar to one proposed for the London Strategic Heat Main

Site Description:

Within Greenwich, the route of the London SHM primarily follows the highways network, including Eastern Way, Western Way, Woolwich Road, Woolwich Church Street, Trafalgar Road, and Creek Road. Additional branches of the SHM would be positioned towards Greenwich Peninsula. The route of the heat main is set out within Figures 2-4 below:

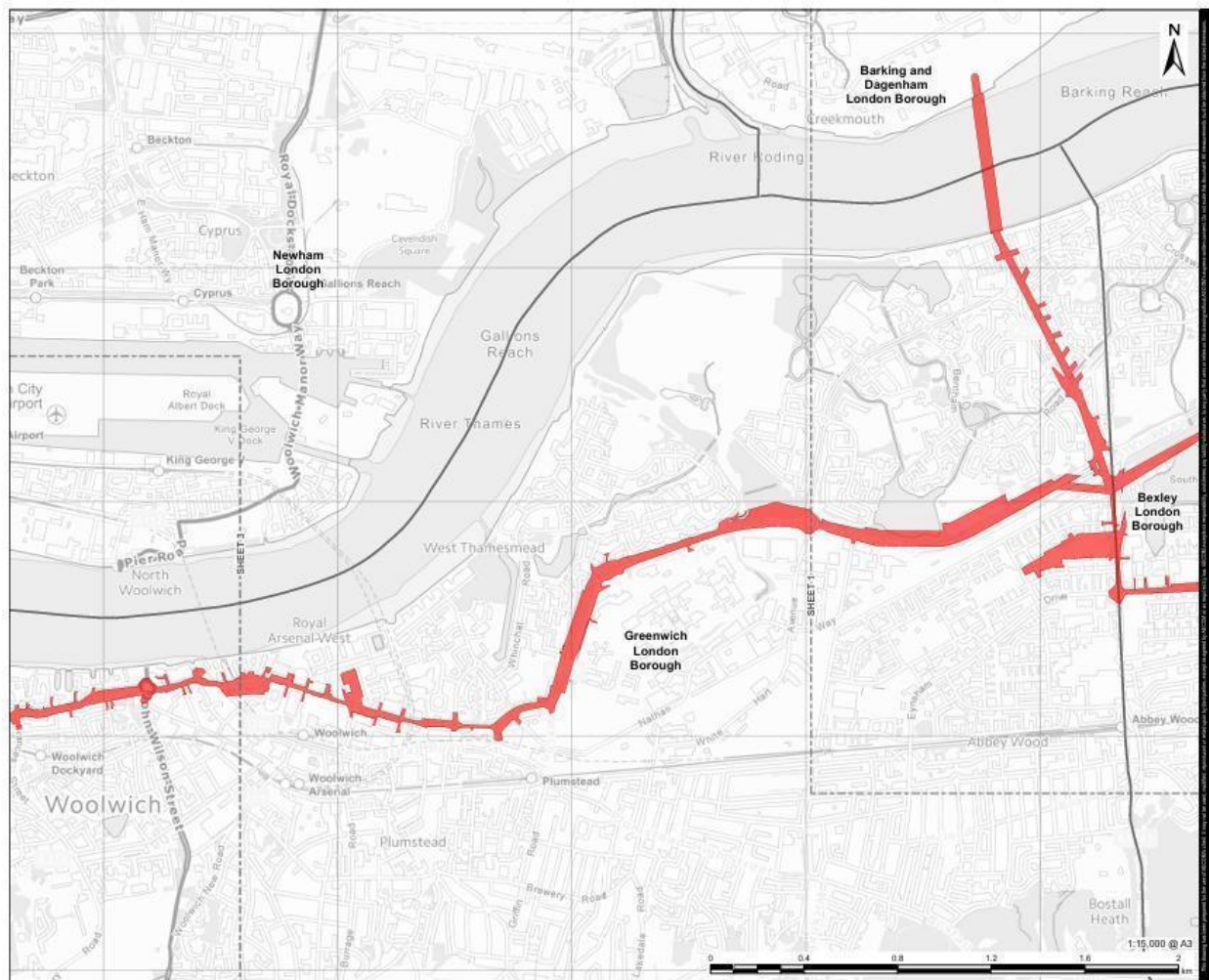


Figure 2: Eastern-most route of the LSHM through RBG

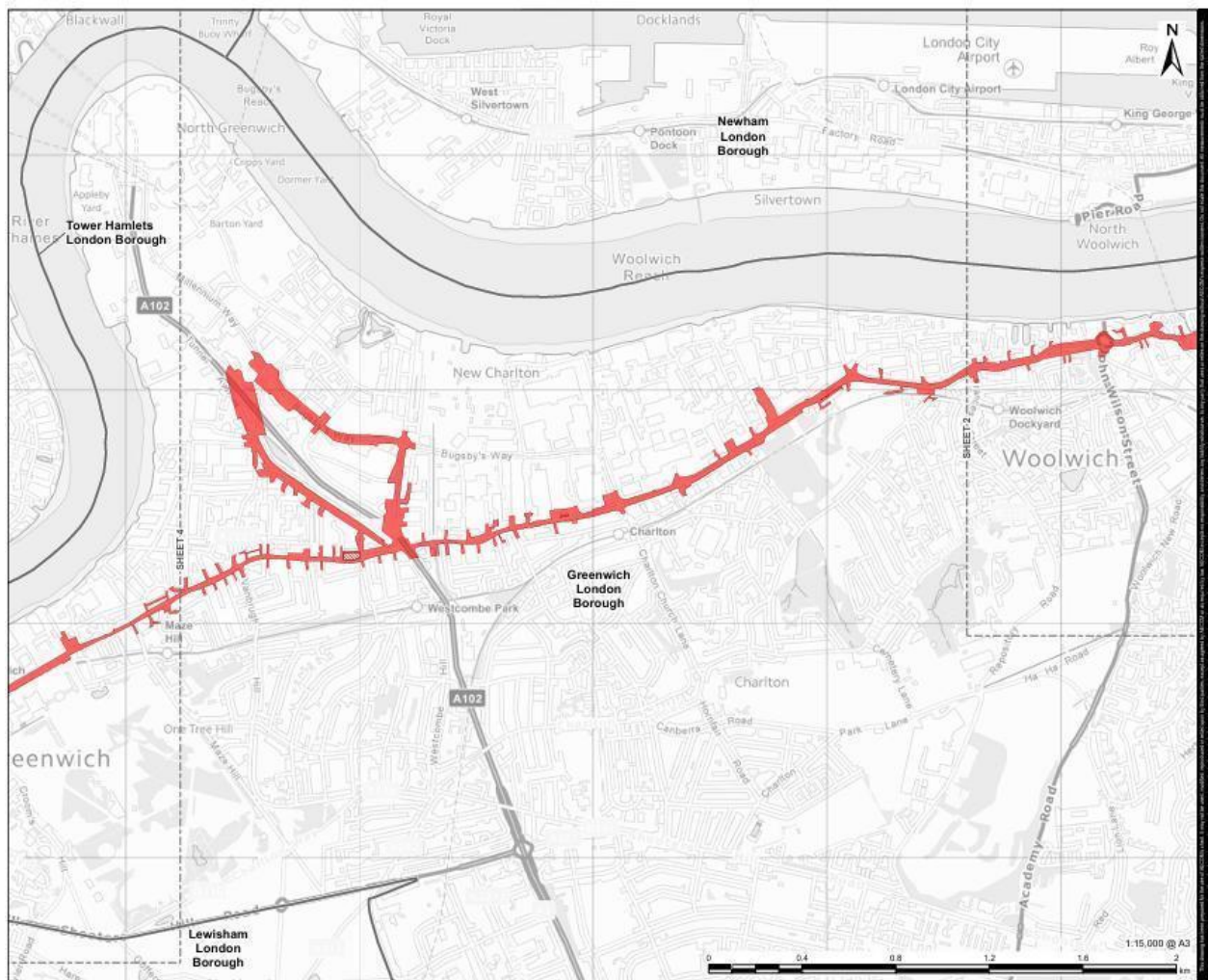


Figure 3: Central section of the route of the LSHM through RBG

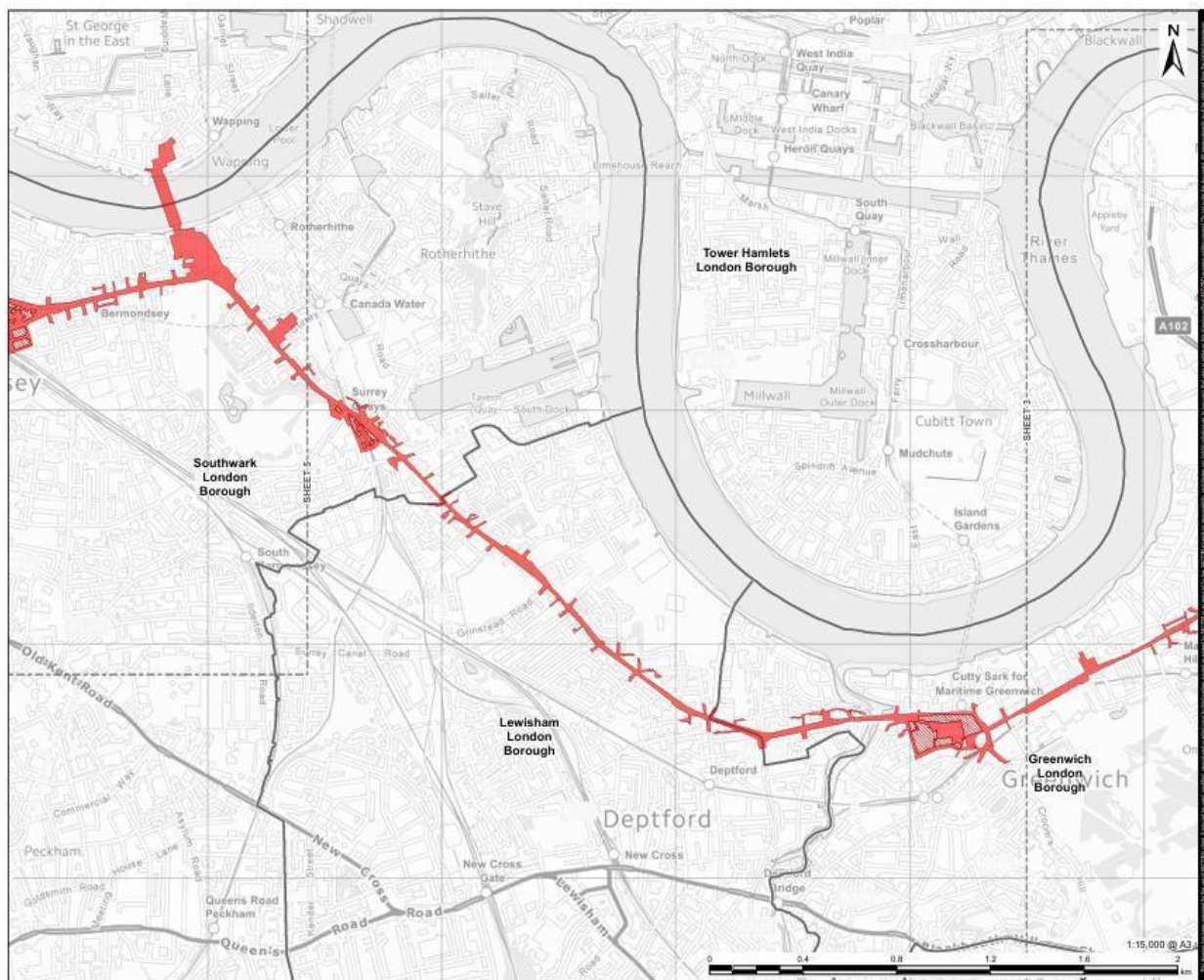


Figure 4: Western-most part of the LSHM as it passes through RBG

Relevant Planning History:

No relevant history within the borough.

Internal Consultation Responses

RBG Sustainability Department:	<i>The local planning authority welcomes early engagement on the project. However, given the scale, length and sensitive environmental context of the proposed heat main, the Environmental Statement should provide a robust assessment of construction-phase effects, cumulative impacts, impacts on sustainable transport networks, flood risk, groundwater resources, designated ecological sites and Water Framework Directive receptors, together with clear</i>
---------------------------------------	---

mitigation and monitoring measures. Whilst there is no objection at this stage, the following are comments that will need to be addressed through the detailed design of the ES statement.

- The Environmental Statement (ES) should assess the cumulative effects arising from the extensive linear nature of the scheme and the likelihood of simultaneous construction activities within multiple London boroughs.
- Given the scale of the route and the urban context, the ES should clearly identify construction compounds, haul routes, temporary traffic management arrangements and anticipated construction sequencing.
- The ES should explain how flexibility in the final route alignment will be managed and assessed to ensure all potentially significant environmental effects are captured [...]

The figures indicate that the route passes through areas with exceptionally high levels of pedestrian, cycling and public transport activity. The route also interfaces with numerous National Cycle Network routes, TfL Cycleways, public rights of way, the Thames Path National Trail, bus corridors and major rail and Underground stations. Planning colleagues should request that:

- The ES includes a detailed construction traffic assessment addressing temporary road closures, lane restrictions, diversion routes and impacts on the Transport for London Road Network and local highway networks.
- Particular consideration is given to impacts on walking and cycling infrastructure including National Cycle Network routes, TfL Cycleways and the Thames Path.
- Detailed assessment is undertaken of temporary impacts on bus services, bus stop relocations, public transport accessibility and pedestrian connectivity to major stations and interchanges.
- The applicant demonstrates how access to businesses, residential properties, community facilities and emergency services will be maintained throughout construction
- A Construction Traffic Management Plan should form part of the mitigation strategy.

The route runs alongside and crosses the River Thames corridor for substantial lengths and passes through areas affected by tidal flood risk, fluvial flood risk and surface water flooding. The figures show interactions with Flood Zones 2 and 3, flood defences, flood storage areas, numerous ordinary watercourses and Environment Agency main rivers. Comments should request:

- A comprehensive assessment of construction impacts on the Thames and associated tributaries, including risks from pollution incidents, sediment mobilisation and dewatering activities.
- Site-specific consideration of temporary works within flood risk areas and demonstration that flood storage capacity and flood defence infrastructure will not be adversely affected.
- Assessment of climate change allowances for both construction and operational phases.
- Appropriate SuDS and pollution prevention measures should be identified

	within the ES. Planning colleagues should seek: • Detailed assessment of effects arising from trench excavation, piling, tunnelling, dewatering and groundwater interception. • Demonstration that there will be no adverse effects on Source Protection Zones or groundwater-dependent terrestrial ecosystems. • Assessment of risks associated with contaminated land mobilisation and pollution pathways to groundwater. The route lies close to numerous designated ecological sites including SSSIs and Local Nature Reserves, notably Inner Thames Marshes, Abbey Wood, and a range of urban ecological sites along the Thames corridor. The ES should: • Assess construction and operational effects on designated sites, priority habitats and ecological networks. • Include consideration of habitat fragmentation, disturbance, vibration and lighting effects. • Assess impacts on habitats associated with the Thames foreshore and riverside environment. • Demonstrate compliance with biodiversity net gain requirements where applicable. Given the length of the route and urban setting, potentially significant temporary effects are likely. The ES should therefore include: • Detailed assessments of noise and vibration. • Air quality and dust assessments. • Construction lighting impacts. • Impacts on residential amenity and sensitive receptors. • Duration and extent of works in each locality, identifying worst-case scenarios. Although the project is intended to support decarbonisation objectives, the ES should: • Clearly quantify whole-life carbon impacts, including embodied carbon from construction activities. • Assess climate resilience risks including overheating, flooding and future climate scenarios. • Demonstrate how route design and infrastructure specification have incorporated adaptation measures.”
RBG Environmental Health Department:	“[...] initial observations are that most of the environmental concerns are likely to arise during construction phase and we’d expect these to be managed through construction and environmental management plans and Section 61’s. In terms of operation issues, noise reports related to the above ground pumping stations will be dependent on location and sensitive nearby receptors. The actual network is underground and if I have understood correctly is planned as much as possible to run parallel to existing road infrastructure, so noise is unlikely to be an issue. I don’t know if vibration could become noticeable at

	times.”
RBG Transport and Highways:	“Having reviewed the submitted EIA Scoping Report, no comments are raised regarding the information proposed to be provided within the Environmental Statement. The scope is considered proportionate for this stage and identifies the relevant environmental topics and supporting assessments. From a transport and highways perspective, the construction-phase effects have been appropriately scoped in, and the Environmental Statement and associated DCO documents are proposed to be supported by a Transport Assessment, Framework Construction Logistics Plan, Framework Construction Worker Travel Plan and relevant construction environmental management measures. Detailed matters, including construction traffic routes, survey locations, temporary traffic-management arrangements and site-specific mitigation, can appropriately be developed through consultation with TfL and the relevant highway authorities as the scheme progresses.”

General Context:

EIA is a process for identifying the likely significant environmental effects (beneficial and adverse) of a project to inform the decision-making process for development consent to be granted. The EIA process culminates in the preparation of an Environmental Statement (ES), in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations). The ES will provide an assessment of the likely significant effects associated with the Proposed Scheme.

The EIA scoping process establishes which aspects of the environment are likely to be significantly affected by a project and involves identifying:

- a. the people and environmental resources (collectively known as ‘receptors’) that could be significantly affected by the Proposed Scheme; and
- b. the work required to take forward the assessment of the likely significant effects.

Schedule 4(4) of the EIA Regulations specifies that the ES should describe the:

“...factors...likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.”

Regulation 5(2) of the EIA Regulations requires the interaction between these factors to be considered. In addition, Regulation 5(4) requires an ES to consider *“...the expected significant effects arising from the vulnerability of the proposed development to major accidents or*

disasters that are relevant to that development”.

Assessment:

It is noted that within Volume I of the EIA Scoping Report the submission fails to note the current preparation of the Royal Borough of Greenwich’s new Local Plan. Greenwich is currently in the process of drafting its new Local Plan - this is currently at Regulation 19 stage and is due to be adopted (and hold full weight) before the end of 2027. This should be considered as part of the drafting of the any ES for this proposal.

Transport and Highways

The TLRN handles high volumes of traffic including freight, bus routes and strategic cycle routes. These routes carry up to 30% of the London’s traffic and help reduce congestion. The Proposed Scheme largely follows TLRN roads. As identified within the scoping report, Royal Borough of Greenwich also supports a number of important walking and cycling routes.

It is agreed that the development is unlikely to result in any unacceptable transport and highways within Greenwich once operational. The construction phase of the development will however likely result in parking impacts, localised impacts on the operation of the wider highways network, and an increase in HGV movements (among other impacts which are correctly identified in section 18.5.3 of Volume I of the scoping report).

Those transport impacts scoped-in or scoped-out (as appropriate) which are set out within Table 18-21 are considered reasonable and appropriate and no objection is raised with respect to these parameters at this stage.

As identified by the council’s internal consultees, any future ES should assess the cumulative effects arising from the potential for simultaneous construction activities across multiple London boroughs. The ES should clearly identify construction compounds, haul routes, diversion routes and effects, temporary traffic management measures and the proposed construction sequencing so this can be properly considered at an early stage. Any ES should also demonstrate how access to businesses, residential properties, community facilities and emergency services will be maintained throughout the construction period, with an associated detailed Construction Traffic Management Plan.

Ecology

The route lies close to numerous designated ecological sites including SSSIs and Local Nature Reserves, notably Inner Thames Marshes, Abbey Wood, and a range of urban ecological sites along the Thames corridor.

Volume I of the scoping report makes clear at section 8.2.5 that no likely significant effects

on ecological features are expected in areas where the London Strategic Heat Main is 5 to 40m below ground. As a result, these subterranean areas are proposed to be excluded from the Study Area of the ES. Noting the nature of the proposals this is considered reasonable for exclusion.

Whilst this is the case, Section 8.4.16 of Volume I of the Scoping Report makes clear that Where MAP (Maintenance and Access Points) sites or other above ground infrastructure are located either within a SINC or near a SINC there is potential for habitat degradation or displacement/disturbance of species. The report makes clear that sites will be scoped-in for further assessment in relation to likely significant effects arising from for all habitat degradation or displacement/disturbance of species impacts. This is welcomed.

Table 8-8 of Volume I sets out that potential impacts to ecology which might take place during the construction phase is proposed to be scoped-in for consideration within the ES. Generally, impacts on ecology relating to the operation of the development are anticipated to be minimal noting the nature of the works, and so would be scoped-out of the ES. Operational lighting would be the exception to this. This is considered to be an acceptable way forward given that operational lighting impacts across the development would have the potential to impact on Bat Species. With regards to other impacts on ecology during operation, the reports confirm that any effects would be controlled through compliance with existing legislation and implementation of the Construction Environmental Management Plan (CEMP).

Flooding and Contaminated land

The route runs alongside and crosses the River Thames corridor for substantial lengths and passes through areas affected by tidal flood risk, fluvial flood risk and surface water flooding. The figures show interactions with Flood Zones 2 and 3, flood defences, flood storage areas, numerous ordinary watercourses and Environment Agency main rivers.

The proposed scheme has the potential to affect groundwater quality and quantity during operation by:

- a. Physical obstruction leading to raised groundwater levels in the upgradient side and reduced groundwater levels on the down gradient side.
- b. Migration of contaminants within groundwater following preferential pathways provided by the foundations of structures to non-contaminated soils, geology and groundwater.

Volume I of the report does confirm that the proposed scheme would include an appropriately designed surface water collection and treatment system, which has specifically been requested by the RBG Sustainability Department. It also confirms that Sustainable Urban Drainage Systems (SUDs) would be incorporated to attenuate runoff from the

Proposed Scheme to a rate agreed with the Environment Agency and or the relevant LLFA. This is welcomed.

Table 19-8 of the Scoping Report seeks to scope-in impacts on groundwater quality and quantity, impacts on surface water quality and hydro-morphology, impacts on Flood risk from all sources, as well as potential impacts on the water supply. This is acceptable.

The Scoping Report also commits to the creation of a preliminary risk assessment which will be used to inform a proposed chapter on ground conditions within the ES. This will include (among other things):

- a. details of land within the Study Area including development history, geology, hydrogeology, hydrology, ground stability, soil and groundwater quality and environmental setting;
- b. a review of the environmental data report provided by a third party, i.e. Groundsure or Landmark Information Group;
- c. details of geological sites (if present);
- d. details of any available site investigation reports for land within the Study Area;
- e. details from a site walkover
- f. conclusions and recommendations.

Risks from pollution incidents, sediment mobilisation and dewatering activities are also proposed to be considered within the ES.

Overall, the proposals to consider Flood Risk and Contamination Risks within the ES are considered to be adequate and no objection is proposed with respect to these elements of the proposals.

Heritage/ Design Impacts

Appendix 10.1 within Volume 3 of the EIA scoping documentation provides a good summary of the heritage assets within the Royal Borough of Greenwich and is a good basis for assessment. Sections 1.5.14 – 1.5.36 of this appendix provides a summary of the archaeological priority areas for which there is a reasonable chance of impacts from the proposal during the construction phase and in the event of disasters or similar. Sections 1.4.1- 1.4.6 of the Appendix 10.1 within Volume 3 also provides a good summary of those other designated heritage assets which are at risk.

Of particular concern to the council is the possibility that MAP's (Maintenance and Access Points) might be positioned in a way which would unacceptably impact the setting of a designated heritage asset, or result in harmful design impacts more generally. It is noted within Table 21-1 that heritage impacts during construction and operation are proposed to be scoped- in to the EIA and this is considered reasonable and proportionate in this

instance given these potential impacts. Where any above ground works are required, this should be considered further within any subsequent applications/proposals and detailed accordingly so officers can consider the impact and ensure that the impacts on all public realm are acceptable and appropriately mitigated.

With respect to the lower ground nature of the proposals, The Royal Borough would encourage the Secretary Of State to undertake full consultation with GLAAS (Greater London Archaeological Advice Service) as they provide detailed advice with respect to a development's impact on archaeological heritage assets.

Other points

Air Quality is proposed to be scoped-in to the proposals, with Table 6-6 within Volume I of the Scoping Report making clear that plant emissions, dust and road traffic emissions from construction vehicles will be scoped-in to the ES. This is welcomed. As a non-emission generating development featuring low levels of operational traffic movements, air quality impacts relating with the operation of the development is proposed to be scoped-out of the ES, and this is also considered to be acceptable in this instance.

Rightly, the proposed ES seeks to scope-in construction noise, construction vibration, and construction traffic vibration, as well as operational noise (this is confirmed within Table 15-14). Given the limited maintenance requirements associated with the operation of the proposed development, and noting how the development is not anticipated to result in any perceptible operational vibration (given the nature of the scheme and its depth underground), no objection is raised with respect to these elements of the scoping assessment.

As set out by the Local Authority's Sustainability Department, although the project is intended to support decarbonisation objectives, any future ES should:

- Clearly quantify whole-life carbon impacts, including embodied carbon from construction activities.
- Assess climate resilience risks including overheating, flooding and future climate scenarios.
- Demonstrate how route design and infrastructure specification have incorporated adaptation measures.

Recommendation:

The proposed scheme subject to these matters as highlighted within this report and the submitted scoping report being detailed accordingly in any future Environmental Statement, the Royal Borough of Greenwich has no objection to the proposal.



Proposed DCO Application by Cory Environmental Holdings Limited for London Strategic Heat Main Project

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor Strutt & Parker/BNP Paribas Real Estate have reviewed the EIA Scoping Report dated July 2026. There are a significant number of operational Royal Mail properties within c.10km of the proposed scheme. Nine of those properties are located within c.500m of the proposed scheme.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly given the impact the proposed development could have on the Strategic Road Network within central London. However, at this point in time, Royal Mail is unable to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

██████████@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

██████████@struttandparker.com), Strutt & Parker.

Please can you confirm receipt of this holding statement by Royal Mail.

End

From: Sphere Enquiries
Sent: Wednesday, August 05, 2026 13:55
To: London Strategic Heat Main
Subject: Fw: Re: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

Hi Gary

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks



[Redacted] | Head of Asset Management &
Operations | Sphere Energy Connect

E: [Redacted] [@sphere-connections.co.uk](mailto:[Redacted]@sphere-connections.co.uk) | **M:** [Redacted]

Internal Use

From: London Strategic Heat Main <LondonStrategicHeatMain@planninginspectorate.gov.uk>
Sent: 07 July 2026 10:50
To: London Strategic Heat Main <LondonStrategicHeatMain@planninginspectorate.gov.uk>
Subject: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

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Dear Sir/Madam

Please see attached correspondence on the proposed **London Strategic Heat Main Project**.

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Sent: Wednesday, August 05, 2026 13:56
To: London Strategic Heat Main
Cc: Safeguarding
Subject: Fw: Re: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

You don't often get email from [REDACTED]@stpancras-highspeed.com. [Learn why this is important](#)

Thanks for the consultation letter, however the proposed infrastructure goes no where near any of our railway infrastructure and therefore we have no comments to make.

For future notice we do not need to be consulted any further on this submission as it progresses through the DCO process

Regards



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<LondonStrategicHeatMain@planninginspectorate.gov.uk>
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Cc: Safeguarding <Safeguarding@stpancras-highspeed.com>
Subject: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

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To: London Strategic Heat Main
Subject: Fw: RE: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

You don't often get email from [REDACTED]@swanleytowncouncil.gov.uk. [Learn why this is important](#)

No comment.

[REDACTED]
Chief Executive Officer

Swanley Town Council

Civic Centre

St Mary's Road

Swanley

Kent BR8 7BU

Tel [REDACTED]

Email: [REDACTED][@swanleytowncouncil.gov.uk](mailto:[REDACTED]@swanleytowncouncil.gov.uk)

From: London Strategic Heat Main
<LondonStrategicHeatMain@planninginspectorate.gov.uk>
Sent: 07 July 2026 10:56
To: STC Town Council <towncouncil@swanleytowncouncil.gov.uk>
Subject: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

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From: [REDACTED]
Sent: Wednesday, August 05, 2026 13:52
To: London Strategic Heat Main
Subject: Fw: EN0710009 - London Strategic Heat Main, ES Scoping Consultation

You don't often get email from [REDACTED]@thurrock.gov.uk. [Learn why this is important](#)

Thank you for consulting Thurrock Council in respect of the above project. The Council does not wish to make any comments on the ES Scoping exercise.

Regards,

[REDACTED] I Principal Planning Officer I Place Directorate

Thurrock Council, Civic Offices, New Road, Grays, RM17 6SL

www.thurrock.gov.uk

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Your ref: EN0710009

Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Transport for London
Investment Planning

10th Floor
Palestra House
197 Blackfriars Road
London SE1 8NJ

www.tfl.gov.uk

LondonStrategicHeatMain@planninginspectorate.gov.uk

29 July 2026

Dear Sir or Madam

Proposed application by Cory Environmental Holdings Limited (the applicant) for an Order granting Development Consent for the London Strategic Heat Main (the proposed development): Scoping Opinion

Thank you for including TfL in the Planning Inspectorate's Scoping consultation under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Please note that this response represents the views of Transport for London officers and is made on a “without prejudice” basis. The comments given should not be taken to represent an indication of TfL's overall position in relation to the Proposed Project nor on any future DCO application.

Transport for London (TfL) is the integrated transport authority for London, responsible for planning, operating and managing the capital's transport network. This includes the London Underground, London Buses, London Overground, DLR, Elizabeth line, London Trams, river services, cycling and walking infrastructure, as well as London's strategic road network, the Transport for London Road Network (TLRN).

TfL also has statutory responsibilities for the safe and efficient movement of people and goods across London and plays a key role in supporting the capital's

economic growth, connectivity, accessibility and environmental objectives. As a result, TfL has a direct and significant interest in any development proposals that may affect the operation, capacity, safety or performance of London's transport network. Accordingly, TfL's comments and recommendations should be carefully considered in the assessment and determination of this application.

TfL comments are summarised below with further detailed information included in Appendices 1-5 that should be considered as the project develops.

Chapter 12: Major Accidents and Disasters

The assessment should consider the impact of catastrophic failure during construction and/or operations of the heat main on TfL's transport network.

Chapter 18: Transport

Baseline

It is essential that the appropriate current and future baselines are set, on the best available information, erring on the side of caution and agreed in consultation with stakeholders including TfL. The Applicant should agree with TfL the baseline and future baseline transport data to inform the EIA and Transport Assessment.

Policy

The assessment should be informed by the relevant chapters in both the current London Plan (2021) and the draft London Plan (2026) particularly Chapter 5: Creating a greener, healthier and resilient city.

Scenarios

Scenarios should cover AM and PM (peak), and the worst case; the Applicant should engage with TfL to inform the Transport Assessment.

Impacts

The scoping document does not reference the impact (journey-time, operations, construction) to non-highway modes (i.e. stations, Underground lines).

TfL would welcome a discussion about construction impacts, including direct impacts on its existing infrastructure and operations, supporting infrastructure, movement of material and people during construction as set out in the appendices. The impact of the construction traffic on travelling to and from the scope area, should also be reviewed and mitigated against where appropriate. TfL expects the Applicant to demonstrate compliance with current TfL guidance on construction logistics and requirements in respect of such matters as Infrastructure Protection.

The assessment should also consider overall impacts to pedestrians and cyclists as well as impact to journey-times/connectivity and safety.

Yours sincerely

[REDACTED]
Lead Sponsor, Investment Planning
Email: **[REDACTED]** [@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)

Copy to: SpatialPlanning@tfl.gov.uk

Appendix 1

Specific Comments from TfL Bus Operations team

Comments on Scoping Report submitted to the Secretary of State on 03 July 2026 - Volume 1:

Page 618; 18.2.3 – When the document refers to the Major Road Network (MRN) this is the equivalent of TfL's Strategic Road Network (SRN) category. The reference to the SRN is specifically National Highways related.

Page 618; 18.2.4 – It is not yet clear which areas will have the 'Maintenance and Access Points (MAP)' – if the scheme were to go ahead, these are likely to be the most affected areas for construction activity.

Page 626; 18.4.2 – The scoping document seems to have ruled out transporting construction and excavated materials by water or rail – this may be a missed opportunity (even if just some is possible).

In addition to those items already identified in the report, it is important the Applicant considers the impact on:

- bus diversion routes;
- bus stands;
- driver changeover points;
- driver toilets and welfare facilities;
- access to bus stations and garages;
- rail replacement services;
- Dial a Ride on demand services; and
- coach movements.

All of these considerations apply to both temporary and permanent bus infrastructure as needed to operate services effectively.

Phasing and coordinating of locations during the construction phases needs to be very sensitively considered in order to ensure access to bus services is still possible and can be carefully managed, with services still able to operate effectively.

It is important to understand the potential impact of maintenance for an asset located beneath roads which buses use to provide services in London. Although potentially infrequent (as noted in the report), the disruption any access requirements could cause, should be acknowledge and quantified where possible to ensure the impact to services can be understood and mitigated.

Page 668; 18.6.39 and Table 18-18 on Page 669 – regarding Driver / Bus Passenger Delay, what values will be assigned for a small / medium / large impact? (the labels are currently very subjective)

Page 668; 18.6.39 and Table 18-18 on Page 669 – regarding Public Transport Capacity – the table seems to imply only increases in demand. The assessment should include reduced demand options too as this will directly correlate to lost revenue.

Appendix 2

Specific Comments from TfL Infrastructure Protection team

LU/DLR/EL Infrastructure Protection Context

The proposed development has extensive works that cross the boundaries of several local planning areas. There are numerous work areas that have included London Underground (LU), Docklands Light Railway (DLR) and Elizabeth Line (EL) land, airspace or subsoil that no permission has been granted to build in. In the majority of these locations any new infrastructure has the potential to result in significant damage and disruption to the LU/DLR/EL network. The Applicant is required to contact TfL Property for agreement prior to finalising the scheme design.

Furthermore, there are a number of potential constraints on the proposed development situated close to TfL assets. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- LUL/DLR/EL right of support is not compromised;
- the development will not have any detrimental effect on our LUL/DLR/EL infrastructure either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed without mitigation measures in place;
- we offer no right of support to the development or land;
- the railway operation would not be disturbed at any time including staff facility, emergency access, staff offices within stations and nor other services outside stations that are essential for railway and station operations.

The Applicants should provide the following information in the EIA:

- i Demonstrate the design for the proposed heat network has considered all TfL assets in the vicinity including temporary works;
- ii Provide an initial ground movement impact assessment on TfL assets due to the network;
- iii Provide an assessment on how TfL assets will be affected by the thermal plume of all the Strategic Heat Main (SHM) elements, considering the nature of TfL assets;
- iv Provide an assessment report regarding the risk of burst pipe and water leakage to underground railway tunnels, surface level geotechnical assets and railtrack within 25m of the proposed alignment. Flood mitigation measures should be in place in particular for SHM elements positioned above TfL assets.
- v Identify the land ownership along the proposed alignment and engage with TfL Property where access to or installations across TfL properties are required.

Comments on Scoping Report submitted to the Secretary of State on 03 July 2026 - Volume 1:

General

Any proposed works falling within 25m of railway assets will need to consult TfL Infrastructure Protection team. In some locations, asset protection agreement requirements and interface management plans will be necessary and is to be developed between TfL and the external company on an individual site basis.

Land

The proposed networks appear to be crossing or running along TfL land in various locations. The Applicant is required to contact the TfL Property team for agreement.

Page 71; 2.5.7 and Page 79; 2.6.4 - The proposed network alignment and construction of 2.5m tunnels throughout London presents a significant risk to TfL operations and the Applicant will need to consider the existence of both surface and underground assets within the TfL network.

Further information will be required on method of construction as this will determine the impact on TfL infrastructure and operations. For each location where there could be an impact on TfL infrastructure, the Applicant will need to submit an assessment of ground movement impact on affected structures and tunnels due to temporary and potential long-term changes in loading for the sub-structure construction stage; Where there is significant impact on TfL infrastructure or operations, the Applicant will need to develop appropriate mitigations or adjust the route such that TfL transport operations and infrastructure is not put at risk or damaged.

Page 410; 12.4.13 - In addition to the TfL assets already identified, the following TfL assets are missing from the scheme documents submitted:

- Elizabeth Line
- Silvertown tunnels
- Other TfL tunnels
- Disused tunnel loops nearby Embankment and also disused tunnel nearby London Bridge below the Thames

Page 415; 12.6.5 - TfL is in discussion with the Department for Energy Security and Net Zero (DESNZ). However, we consider the protective provisions are insufficient for TfL to maintain safe railway operations.

TfL infrastructure process should be strictly followed and the TfL Infrastructure Protection team should be contacted.

As the project progresses we are highlighting now that we will request the following protective provision condition:

The proposed works should not be commenced until a Comprehensive Asset Protection Scheme for the safeguarding of TfL infrastructure, operations and maintenance (in consultation with TfL Infrastructure Protection), has been submitted to and approved in writing by the local planning authority.

Comments on Environmental Impact Assessment Scoping Report 6.1.2 Volume 2: Figures:

Figure 2-2; Sheet 2 of 6: Key Environmental Constraints - Elizabeth Line tunnel in green is missing on the plan as extracted from TfL GIS.



Figure 2-2; Sheet 3 of 6: Key Environmental Constraints - There are a few TfL owned tunnel assets within the proposed network – Silvertown tunnel portal and surface tunnel structures, which appears to be within the EIA scope but they are missing on this plan.

Figure 2-2; Sheet 5 of 6: Key Environmental Constraints - In general, there is a disused tunnel below the Thames nearby the London Bridge, and station layouts of Liverpool Street including shallow passenger tunnels are not marked.

There is a disused tunnel loop below the Thames nearby Embankment.

Appendix 3

Specific Comments from TfL Surface Network Operations team

Comments on Scoping Report submitted to the Secretary of State on 03 July 2026 - Volume 1:

Our primary requirement will be to ensure we have appropriate understanding of the transport and safety impacts of the project and this in turn will allow our Subject Matter Experts (SME) to provide responses.

In outline we would mandate the following activities which need discharge before determination:

1. Review the scope of the highway lane restrictions for each 'site' – the Coordination and Permitting team will be the SME on this for the Applicant to engage with and test the space/safety/performance aspects to optimise. At this stage understanding the delivery timeline and overlaps with any other TfL/Borough/Utility project will be important to understand so that works can be ordered and coordinated to provide the lowest customer disruption.
2. Optimise Traffic Management arrangements, following TfL's modelling guidance process (MAP), a modelling expectations document for each 'site' outlining the scope, any type of any modelling assessment and the packages to use along with the forecast years. TfL would likely preference the 2031 latest edition of ONE with support from MOTION runs as required. During this process other committed or 'highly likely' schemes and roadworks interventions will be included so TfL has the best prediction of how the network will operate.
 - a. TfL will review the proposals alongside the Coordination and Permitting teams to grade from low impact to high impact and use that to prioritise the order of work and assessment.
 - b. TfL will need clear forecasts of construction and spoil traffic and any special operations.
 - c. For simpler interventions, LINSIG will inform how the network will handle any lane restrictions.
 - d. For more complex or networks at / above saturated conditions this may lead to microsimulation in VISSIM as this is the best tool to explore blocking and congestion, especially if bus mitigation needs to be designed to protect PT services.

3. For safety TfL will carefully review any changes to footways, cycle lanes, traffic lane numbers/widths or changes to signalised junctions either temporary or permanent. TfL Engineering will be engaged to assist with those elements.
4. Sites with impact on the SRN or TLRN would be subject to TMAN approvals for any enabling or streetworks linked to the project. Where a site only contains borough highways TfL would still need to be engaged as the traffic signalling authority for London who would support the boroughs with any signal timing changes during the project lifecycle (be those temporary signals, which TfL would need to help them design/mitigate, or changes to permanent signals).

Appendix 4

Specific Comments from Investment Planning – Professional Services - Environment

Comments on Scoping Report submitted to the Secretary of State on 03 July 2026 - Volume 1:

- TfL acknowledge the advantage of using pipe-jacking as it reduces impact on the TLRN (no need to dig up the road), however there will still be some impacts as the method will require some entry / exit points, manholes, road closures etc. The Applicant is to ensure these impacts to TfL operations and infrastructure are considered in the assessment.
- TfL notes that the vast majority of impacts in scope are related to construction. The operational impacts in scope are mostly related to the operational site in Belvedere. While there will be maintenance work along the length of the pipe throughout its operation, it is understood that traffic impacts will be minimal, and as such this is not in scope for the EIA.
- TfL notes that no assessment is proposed for decommissioning as the plan is for the Main to be a long-term part of London's infrastructure.
- TfL would welcome more detail of the Applicant's construction logistics plan, particularly the plans for use of river-vs-road when transporting waste from sites.

Appendix 5

Specific Comment from Operational Security and Crime Reduction team

Having received a brief update around the scope of this project I have the following comments to make:

This is not a TfL project but due to the potential crossovers and impact this may have on our services, I would welcome the opportunity to understand the projects security stance. I understand that some information might not be able to be shared widely therefore, I would be happy to discuss this with any security leads for this project in order to provide greater comfort for TfL.

From: [REDACTED]
Sent: Wednesday, August 05, 2026 13:54
To: London Strategic Heat Main
Cc: [REDACTED]
Subject: Fw: RE: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

You don't often get email from [REDACTED]@trinityhouse.co.uk. [Learn why this is important](#)

Good afternoon Gary,

With reference to the attached letter, as it appears there are no expected works to be carried out below the high water mark, Trinity House has no comments to make. However, should this change or not be the case, such works should be discussed with the Port of London Authority in the first instance.

Kindest regards,

[REDACTED]

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED]@trinityhouse.co.uk | [REDACTED]

www.trinityhouse.co.uk



TRINITY HOUSE

From: London Strategic Heat Main
<LondonStrategicHeatMain@planninginspectorate.gov.uk>
Sent: 07 July 2026 10:57
To: Navigation <navigation.directorate@trinityhouse.co.uk>
Cc: [REDACTED]@trinityhouse.co.uk
Subject: EN0710009 - London Strategic Heat Main Project - EIA Scoping and Consultation

FAO [REDACTED] - Navigation Services Officer



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0710009
Our Ref: 95536CIRIS

██████████
Senior Environmental Advisor
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

30 July 2026

Dear ██████████

Nationally Significant Infrastructure Project London Strategic Heat Main Project PINS EN0710009, Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from, for example, emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focuses on an application's significant effects.

Having considered the submitted scoping report, we wish to make the following comments:

Environmental Public Health

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key

information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an Environmental Statement (ES), we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Electric and Magnetic Fields (EMF)

When considering potential EMF health impacts from the proposed electrical infrastructure, please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines, including the operational conditions for scoping out electrical infrastructure:

<https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>

More information is available in the following advice document produced by Public Health England, a UKHSA predecessor body:

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>