

From: [REDACTED]: RBKC

Sent: Wednesday, August 05, 2026 15:18

To: London Strategic Heat Main

Cc: [REDACTED]: RBKC

Subject: Fw: London Strategic Heat Main Project: Scoping. Comments from Royal Borough of Kensington and Chelsea

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Dear Sirs

Thank you for the opportunity for the Royal Borough to comment on the scope of the Environmental Statement of the Development Consent of the London Strategic Heat Main. I hope you find our comments helpful.

Chapter 5: EIA approach and methodology

Approach to alternatives: The applicant should consider whether there are any existing tunnels that could be utilised for the scheme. These could include, for example, the abandoned London Post Office railway, the Thames Tideway Sewer or the existing underground network.

Chapter 6: Air Quality.

The ES should specifically consider the material (slurry) generated by the tunnel construction. This should include consideration of emissions related to the operation, maintenance and delivery trips associated with the slurry segregation plant within the MAP Construction Compound.

Section 6.6 Assessment Methodology

Para 6.4.12. Assumptions should be assessed using the most up-to-date Defra and LA evidence available.

Para 6.4.13. The LA is happy to agree monitoring locations. This monitoring should include particulate matter and not just NO₂. The ES must identify the proposed construction traffic routes within the borough so that the possible impact of the proposal on residential, educational and healthcare receptors can be properly assessed.

Para 6.5.5 and 6.6.5-5 refer to modelling of generators. Any temporary construction energy plant associated with tunnelling activities should be properly assessed and modelled. This will include those with a thermal capacity less than 1MW.

Para 6.7.3 states that monitoring “may include” dust monitoring. Monitoring of dust is essential in all circumstances.

The ES should specifically assess emissions associated with slurry treatment, spoil handling, stockpiling, loading and transportation activities and identify mitigation measures.

The ES should place equal emphasis on PM₁₀ and PM_{2.5} emissions as on NO₂ and demonstrate that emissions of particulate matter and precursor pollutants have been minimised as far as reasonably practicable.

Air quality findings should be appropriately reflected within the Human Health Assessment, particularly in relation to construction phase particulate matter exposure at sensitive receptors. Particular consideration should be given to impacts at schools, care facilities, hospitals and other locations occupied by vulnerable populations.

Chapter 7: Climate

Table 7.2 refers to Local Plan Policy BG4 as a relevant local plan policy. It should also reference Local Plan Policies GB2: Circular Economy and GB3: Whole Life-Cycle Carbon

Para 7.4.7. The examples of extreme weather should be amended to include 12th and 25th July 2021 extreme rainfall events, as well as 20th July 2007 extreme rainfall event. These events resulted in the flooding of over 2,000 properties in London

Chapter 8: Ecology

Table 8.5. The National History Museum Gardens SINC, the Ranelagh Gardens SINC, Chelsea Royal Hospital South Lawn SINC and the Royal Hospital Old Burial Grounds SINC should be added as are non-statutory designated ecological assets which are in close proximity to the EIA scoping boundary.

Chapter 9: Ground conditions

Phase 1 Preliminary Risk Assessment. This should include a UXO preliminary risk assessment, contaminated land search and an assessment to identify potentially significant pollutant linkages.

Section 9.9. The list of scoped in items (*table 9-10*) should also include items such as:

- Encountering unexpected contamination

- Encountering unexploded ordnance
- Release of naturally formed gases, from greater depths, to the surface and surrounding buildings
- Opening up pathways between current/future contamination sources and aquifers, where historical wells (or other similar infrastructure) are disturbed during the drilling

Chapter 10: Historic Environment

Figure 10-1 includes the relevant designated Heritage Assets. The Sloane Square, Hans Town Brompton and Queen's Gate CAs should all be included as lie within 100m of the Heritage Scoping Study Area. These should also be included in Figure 17-2, "townscape context",

Chapter 14: Minerals and Waste

The Environment Statement should provide a quantified assessment of material resource use, tunnel arisings, construction waste generation, opportunities for reuse and recovery, sustainable transport of materials and waste, landfill diversion, and circular economy outcomes

Chapter 19: Water environment and flood risk.

Parts of the Proposed Scheme lie in the Sloane Square Critical Drainage Area as set out in the RBKC Surface Water Management Plan (2014). Consideration should be given to the risk of flooding from surface water to above-ground infrastructure such as the MAPs.

Para 19.6.1. Baseline data sources should also include sewer capacity data from the Water and Sewerage Company, Thames Water, as there is a locally significant risk of surface water and sewer flooding.

Pra 19.6.3 The technical guidance included in the scoping should include London-wide guidance and documentation presented in the London Plan (2021 or subsequent when published).

Para 19.6.16 states that surface water attenuation should be provided on site, while this is the preferred, there may be locations where more sustainable SuDS that include green infrastructure and multi-functional benefits can be delivered offsite. This is secured in the RBKC Local Plan 2024 and in the emerging London Plan 2026. Opportunities to deliver these should be explored during the ES for the scheme and promoted as mitigation, ensuring that appropriate maintenance is in place.

Do not hesitate to contact me if you have any questions.

Regards



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