

Riverside Energy Park

Environmental Statement Technical Appendices

APPENDIX:

K.5

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	Name	Position	Signature	Date
Prepared by:	Jonny Murphy	Environmental Planner	JM	10/10/2018
Reviewed by:	Chris Leach	Senior Associate	CL	10/10/2018
Approved by:	Dermot Scanlon	Director Major Infrastructure	DS	10/10/2018
For and on behalf of Peter Brett Associates LLP				

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1 Introduction

- 1.1.1 National Policy Statement (NPS) EN-1 requires an assessment of potential effects to be set out in the Environmental Statement (ES) when a Proposed Development may have an effect on civil or military aviation and/or other defence assets. The REP site is located on land immediately adjacent to Cory's existing Riverside Resource Recovery Facility (RRRF), within the London Borough of Bexley. It is approximately six kilometres (km) east of London City Airport, which is officially safeguarded to ensure its safety and operation is not compromised.
- 1.1.2 One means by which a development may impact on aviation assets is through the presence of tall structures (e.g. emission stacks) that may interrupt communication, navigation and surveillance, including radar. Development can also act as a reflector or diffractor of air traffic control radio signals. In relation to REP, the potential effects therefore primarily relate to the stack at a proposed maximum height of 113 m above Ordnance Datum (AOD). Whilst 113 m AOD is the proposed maximum height of the stack, it is likely this would be at a height of 90 m, as is the case with the RRRF.
- 1.1.3 Given the above, the Scoping Report submitted for the Proposed Development considered the likelihood for significant effects to aviation. It stated that due to sufficient mitigation in the form of consultation, appropriate aviation lighting and highlighting developments on aviation mapping, coupled with the precedent for existing comparable structures in the immediate locality of REP, significant effects on aviation were considered unlikely. However, to respond to the requirement of NPS ES-1 the Scoping Report stated that a standalone statement in relation to aviation would be submitted as part of the DCO application. The Secretary of State's Scoping Opinion (Appendix A.1) agreed with this approach and scoped aviation out of the ES. No objections or concerns were raised with this approach through the Section 42 consultation (see **Table K.5.1** below).
- 1.1.4 This statement therefore provides high level consideration of effects on aviation resulting from the Proposed Development. This statement considers impacts upon the operation of communications, navigation and surveillance (CNS) infrastructure, flight patterns, other defence assets and aerodrome operation procedures in accordance with NPS EN-1. The cumulative effects of the Proposed Development with other relevant projects are also considered.

2 Section 42 Consultation

2.1.1 As part of the Section 42 statutory consultation phase, a number of organisations were consulted in relation to potential effects from REP (further details are provided in the Consultation Report (**Document Reference 5.1**)), including those with an interest in aviation assets. **Table K.5.1** below highlights the key consultation responses received to date relating to aviation and how these have been addressed.

Table K.5.1 – Section 42 consultation

Reference	Comment	Applicant Response
Civil Aviation Authority		
Scoping Response	If a structure constitutes an aerodrome obstruction, the aerodrome operator will review the requirement to light tall structures. Away from aerodromes, lighting is only legally mandated for structures of 150 m or more above ground level. Cranes in place for more than 90 days should be considered a permanent structure. Cranes of 60m or more need to be equipped with aviation warning lighting.	The Applicant acknowledges the response. The tallest structure on site would be the main stack (at a maximum height of 113 m AOD) and would not exceed 150 m Above Ground Level (AGL). Whilst details of construction plant (including cranes) has not yet been finalised, any cranes above 60 m would be fitted with aviation warning lighting. Crawler and mobile cranes are anticipated to be in use at the REP site for over 90 days and therefore would be considered as permanent structures. As confirmed through London City Airport's S42 consultation response (below), REP does not constitute an aerodrome obstruction.
S42 response to PEIR	The CAA wishes to make the following recommendations: 1) London City Airport are advised of this proposal to discuss whether the	London City Airport were consulted as part of the Section 42 Consultation for the Proposed Development. Their

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Reference	Comment	Applicant Response
	flare is deemed an obstacle (within their safeguarding area).	<p>comments and responses are detailed below in this table.</p> <p>The height and approximate location of the main stack and building was included in the S42 consultation. It is assumed that the CAA intended to refer to the main stack when identifying the 'flare'. However, note that the REP 'flare' stack specifically (being a low level enclosed structure for emergency use in conjunction with the Anaerobic Digestion facility) would be lower, at a height of up to 14 m. On this basis it is not considered to be a potential aerodrome obstruction.</p>
	2) I would recommend that London Westland (Battersea) Heliport are advised, if they haven't been already.	The Applicant has engaged with London Westland (Battersea) Heliport to make them aware of the Proposed Development.
	3) I have also given you a link to guidance for crane operators on aviation lighting and notification CAP1096. Temporary structures such as cranes can be notified through the means of a Notice to Airmen (NOTAM). If above a height of 300ft (91.4m) above ground level, the developer must ensure that the crane operator contacts the CAA's Airspace Regulation (AR) section on Arops@caa.co.uk	The Applicant notes the advice. Whilst final details of construction plant (including cranes) has not yet been finalised, the CAA AR section will be notified of any crane above 91.4 m. This is likely to include the crane used to erect the REP main stack.

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Reference	Comment	Applicant Response
	<p>4) Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the National Police Air Service (NPAS) organisation via email npas.obstructions@npas.pnn.police.uk</p>	<p>NPAS were consulted as part of the Section 42 Consultation for the Proposed Development. Their comments and responses are detailed below in this table.</p>
	<p>5) Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the relevant Air Ambulance Units - https://associationofairambulances.co.uk/member/london-ambulance-service-nhs-trust/</p>	<p>The following local emergency services have been consulted and to date no responses have been received:</p> <ul style="list-style-type: none"> • London Ambulance Service NHS Trust; • South East Coast Ambulance Service NHS Foundation Trust; • Barking, Havering and Redbridge University Hospitals NHS Trust (email only); • Dartford and Gravesham NHS Trust (email only); • Lewisham and Greenwich NHS Trust (email only); • London Fire Brigade; • London Fire Commissioner; • Kent Fire and Rescue Service; and

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Reference	Comment	Applicant Response
		<ul style="list-style-type: none"> Kent Police and Crime Commissioner.
	I would also recommend that this proposal should be brought to the attention of the department responsible for maintaining the list and production of charting regarding tall structures at the following email address: dvof@mod.gov.uk	The Ministry of Defence (MOD) were consulted as part of the Section 42 Consultation for the Proposed Development. Their comments and responses are detailed below in this table.
National Police Air Service		
S42 response to PEIR	This has been looked into by our Head of Ground Infrastructure and the local NPAS base and I have been advised to inform you that your proposal would not affect our operations.	The Applicant acknowledges the response.
Ministry of Defence (MOD)		
Scoping Response	No safeguarding objections to the proposal.	The Applicant acknowledges the response.
S42 response to the PEIR	No safeguarding objection to this proposal.	The Applicant acknowledges the response.
Defence Geographic Centre (DGC)		
S42 response to PEIR	We here at DGC are concerned with the safeguarding of low flying aircraft. To this end, we maintain and disseminate a database of potential obstructions to low flying aircraft called "DVOF" (Digital Vertical Obstruction File). In order to ensure this database is up to date, and to safeguard your project, we would be grateful if you could keep us updated regarding any cranes at the site and of any building works that reach 75 ft or more above ground level. Those are the criteria we use for including items in our database. If you do this for us then we can liaise with the RAF and the Civil	The Applicant notes the advice. Whilst details of construction plant (including cranes) has not yet been finalised, the CAA AR section will be notified of any crane above 75 ft AGL. A requirement to notify the DGC and CAA is included within the outline CoCP submitted in support of the REP DCO.

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Reference	Comment	Applicant Response
	Aviation Authority to ensure that aircraft are aware of your site.	
NATS En-Route Safeguarding		
Scoping Response	No safeguarding objection (based on information provided within scoping opinion).	The Applicant acknowledges the response.
S42 response to PEIR	NATS anticipate no impact from the proposal and has no comments to make on the PEIR.	The Applicant acknowledges the response.
London City Airport		
S42 response to PEIR	<p>1 - I Cannot find grid reference coordinates in the documents do you have an exact coordinate for the position of the 113m AOD chimney/stacks.</p> <p>2 – Could you give me an idea of how much smoke and what colour smoke we can expect from the chimneys and an estimate of how high the smoke plumes might extend on a still day with no wind. I want to gain an understanding of what it might do to a pilot’s visuals.</p> <p>3 – There will be lots of landfill moving around the plant, is there a bird management strategy or methods to limit the bird presence on site.</p>	<p>The Applicant responded by email on 6th July 2018, outlining the following:</p> <p>Approximate coordinates of the stack, would be reported to the relevant aviation authorities once finalised.</p> <p>That there would be no dark smoke emitted from the emission stacks but occasionally visible water vapor plumes similar to RRRF may be seen.</p> <p>That there would be no landfill operations proposed as part of the REP DCO. Waste delivered by road or river would be in sealed containers, the negative air pressure system within the Main REP Building would prevent release of odour and waste that might attract birds. The existing RRRF operates without issues arising from birds or vermin. Standard management procedures</p>

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		would be implemented in the event of an issue arising.
S42 response to PEIR	Due to the distance from the airport, the maximum height of chimney being 113 m AOD and the assurance that bird populations will not be increased as a result, London City Airport has no objection to this development.	The Applicant acknowledges the comments.

2.1.2 As set out in **Table K.5.1** above, it is considered that sufficient mitigation exists, in the form of notification with safeguarded airfields and with relevant stakeholders at the appropriate time to limit any potential effects. Additionally, appropriate aviation lighting would be applied to any structures exceeding height thresholds (e.g. 60 m AGL for temporary cranes). Once the grid coordinates of the Proposed Development are finalised, they would be reported to the relevant aviation authorities (e.g. CAA, MOD, DGC) as required in the CoCP, so that they could be recorded on aviation mapping. Coupled with the precedent for existing comparable structures already set in the immediate locality of the REP site, effects to civil or military aviation or defence interests are not anticipated to be significant alone or in combination with other developments.