

Cory Decarbonisation Project DCO

LB Bexley Local Impact Report

26th November 2024

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INTRODUCTION

Cory Environmental Holdings Limited (CEHL) is seeking Development Consent under the Planning Act, 2008 from the Secretary of State for Business, Energy and Industrial Strategy for a carbon capture facility situated to the south of the existing Riverside Resource Recovery Facility (RRRF) on land at Norman Road, Belvedere, Bexley.

The London Borough of Bexley (LBB) are the Local Planning Authority within which the proposed development is situated, and this document is its Local Impact Report to the Planning Inspectorate on this Nationally Significant Infrastructure Project (NSIP).

FORMAT

This document comprises views of the Council on the likely impacts that the development would have on its area. The first section sets out the planning history of the site insofar as it is relevant to the proposal. Thereafter the local impacts are set out under the following technical areas:

- Air Quality
- Noise and Vibration
- Terrestrial, Riparian and Marine Biodiversity
- Historic Environment
- Townscape and Visual (including Arboriculture)
- Water Environment and Flood Risk
- Climate Resilience
- Greenhouse Gases
- Socioeconomics
- Ground Conditions and Soils
- Landside Transport
- Land Use and Consideration of Alternatives

Each section is presented in a similar format comprising of an analysis of the planning policy framework, followed by an analysis of the local impacts under the following headings:

- Positive Impacts
- Negative Impacts
- Neutral Impacts

This Local Impact Report and the Written Representations are accompanied by a track changed draft of the applicant's version of the Development Consent Order (DCO), where the changes represent those that would address the concerns of the Council.

A Summary of this report is also provided in accordance with the Infrastructure Planning (Examination Procedure) Rules.

Summary

The report sets out the planning history that is relevant to the site and the proposed development. In each section of the report the planning policy framework is explained in a format that follows this broad structure under each topic area:

- London Borough of Bexley Policies
 - Bexley Local Plan 2024.
- Policy Appraisal
- Other Relevant Local Policy and Guidance.

The Local Impacts in each topic area are set out under those which will have a positive, a negative and a neutral impact on the borough.

Air Quality

In most respects, the Applicant has designed the proposed development to avoid significant impacts on local air quality, and hence on the health of local people and nature conservation.

Positive Impacts

The following positive impacts have been identified.

- Removal of 1.3 million tonnes of Carbon Dioxide from the atmosphere.

Negative Impacts

The following negative impacts have been identified:

- The location of short term generators has not been provided. At the very least, short term generators need to be located at least 25 metres from Crossness nature reserve.
- No response to the Council's Relevant Representation with regard to the potential emissions of chemicals used to capture CO2 emissions have been provided.

Neutral Impacts

The following neutral impacts have been identified:

- The applicant has demonstrated that the Environment Agency's nitrosamine guidance has been followed and that the scheme represents an acceptable level of risk according to EA guidance. However, the evaluation of model results in Table 5-36 and Figure 5-12 are not consistent with the EA guidance.

- Mitigation measures required through best practice for dust will be implemented but additional measures should be included to minimise dust nuisance and human health impacts from construction activities.

Noise and Vibration

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Potential for noise impacts due to noise emissions from the proposed development affecting the nearest residents, particularly as this is a 24-hour operation.
- Potential for additional road traffic, generated by the development during construction and operations, to cause negative impact on local access routes.
- Negative impacts may also occur during construction of the proposed development, but this would be of a temporary nature.

Neutral Impacts

The following neutral impacts have been identified:

- The noise and vibration assessment of the proposals has concluded that the overall impact on the local area would be “not significant”. This would be achieved through effective mitigation measures employed during the design of the plant and during the construction process.
- The draft DCO sets out that construction hours would be between the hours of 07:00-19:00 hours Monday-Friday and 07:00-13:00 hours on a Saturday with no construction taking place on Sundays or Bank Holidays. These hours exceed the Council’s limitations for noisy works which are restricted to between 08:00 and 18:00 hours on weekdays and 08:00 to 13:00 on Saturday. Dispensations to these times can be agreed as necessary with particular reference to tidal jetty works that would require some 24-hour working for logistical reasons.

Terrestrial, Riparian and Marine Biodiversity

Positive Impacts

The following positive impacts have been identified:

- The applicant is in discussion with Peabody in order to provide off-site compensation as well as biodiversity net gain at Thamesmead Golf Course.

- The applicant is seeking to provide biodiversity measures to achieve a net gain in biodiversity within the Norman Road Field, which is within the Erith Marshes Metropolitan SINCE, to the south of the proposed development.
- Norman Road Field would be incorporated into Crossness Nature Reserve thereby seeing a net area of the nature reserve increasing by circa 5-6 hectares.

Negative Impacts

The following negative impacts have been identified:

- Loss of circa 3.3 hectares of Erith Marshes Metropolitan Site of Importance for Nature Conservation (MSINC). The land lost also forms part of Crossness Nature Reserve.
- The development proposes to re-provide land for the Crossness Nature Reserve but does not provide any replacement land for the MSINC.
- Impacts on Strategic Green Wildlife Corridor and Southeast London Green Chain.
- A completed biodiversity metric calculation tool has not been submitted.
- Baseline conditions and future baselines for marine biodiversity are limited and further expansion of baselines to include additional information is required.

Neutral Impacts

The following neutral impacts have been identified:

- Neutral impacts will be entirely dependent on the successful implementation of mitigation and local compensation as outlined in the Applicant's Biodiversity net gain report.
- The applicant is seeking in the DCO at paragraph 48 (2) (c) to abrogate clause 4 of the 1994 Section 106 agreement between the London Borough of Bexley and Thames Water. Clause 4 of that S106 ensures that the Crossness Nature reserve is managed for 99 years by Thames Water and sets out processes etc for reviewing management plans etc. A S106 (or S111) agreement would be needed to secure that the nature reserve is still managed and processes etc for reviewing management plans etc are maintained for the remainder of the 99-year period and what was agreed previously.
- The Norman Road field is also subject to biodiversity enhancement measures via a S106 (or S111). It is unclear whether mitigation measures were implemented and therefore baselines are questioned.
- The Norman Road field is already within the Erith Marshes Metropolitan SINCE.

Historic Environment

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Impacts on the Lesnes Abbey group of designated heritage assets (Scheduled Monument and Grade II Listed Building) have not been assessed. These need to be considered in accordance with the requirements of the NPPF (paragraph 205 onwards). It is worth noting that an assessment of the potential impacts on the setting of the Lesnes Abbey site was previously made under the DCO application for Riverside 2, and in this case the proposed development is both at a closer distance to Lesnes Abbey, with certain elements of built form which will be greater in height than the approved stack of Riverside 2 (once constructed).
- The Crossness group of industrial designated heritage assets (Crossness Conservation Area; Crossness Pumping Station - Grade I Listed Building; Crossness Pumping Station workshops - Grade II Listed Buildings) and non-designated heritage assets (Crossness engine house) – assessed as receiving a not significant-minor adverse effect.

Neither effect is held to be significant for the purposes of EIA, but nevertheless will give rise to a degree of harm to the assets' heritage significance (regarding the designated heritage assets) through development occurring within their wider setting. Harm to heritage assets of national importance (those designated and included on the National Heritage List for England – NHLE) will need to be considered properly in line with national and local planning policy, statutory provisions and recent case law.

The impact upon the group of designated and non-designated heritage assets should also be considered.

Neutral Impacts

No neutral impacts have been identified.

Townscape and Visual (including Arboriculture)

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- The development - with particular reference to the proposed absorber columns which will be located to a height of circa 113 metres - are likely to have significant, adverse effects on the landscape. This impact is not limited to direct views of the site as these would be the tallest structures in the area, surpassing the maximum height of any other existing (stacks at being Riverside 1 circa 85-90 metres in height) or approved development (stacks at Riverside 2 will be of a

similar height to Riverside 1) within the adjacent surrounding industrial landscape.

- Loss of landscape character experienced by users of Norman Road (e.g. walkers seeking to access the Thames Path to the north of the site) as a result of a reduction in visual links between the marshland and the river, and users of the public rights of way across the Crossness Nature Reserve and Crossness Nature Reserve itself, due to the large scale of the built form as seen from this location.

Neutral Impacts

A number of slight-moderate (not significant) impacts have been reported in the Environmental Statement during operation – these neutral impacts tend to be on mid-distance views (such as the Belvedere or Thamesmead residential areas or the road network) where the proposed development would be in keeping with the existing industrial elements of the view.

Water Environment and Flood Risk

Positive Impacts

No positive impacts have been identified.

Negative Impacts

No negative impacts have been identified.

Neutral Impacts

The following neutral impacts have been identified:

- The Applicant has confirmed that a full drainage strategy will be submitted for approval but it is unclear as to when this would be. It is assumed that this would be at requirement stage if a Development Consent Order was granted.
- The Applicant has updated the expected lifetime of the development and associated climate change allowance for the assessment.
- The Council also acknowledges the information around the access points for maintenance of the drainage ditches.
- the submitted information states that some of the drainage ditches on the site will be infilled to enable to the development and that they will be replaced by the drainage system. The applicant will need to demonstrate within the detailed drainage strategy that there will be no loss of storage and no increase in flood risk as a result of these changes.

Climate Resilience

Positive Impacts

The following positive impacts have been identified.

- Removal of 1.3 million tonnes of Carbon Dioxide from the atmosphere.

Negative Impacts

No negative impacts have been identified.

Neutral Impacts

No neutral impacts have been identified.

Greenhouse Gases

Positive Impacts

The following positive impacts have been identified:

- Removal of 1.3 million tonnes of Carbon Dioxide from the atmosphere.

Negative Impacts

No negative impacts have been identified.

Neutral Impacts

- The GHG assessment has not considered any future evolution of waste throughput and composition as an immediate consequence of the implementation of upcoming expected waste policies and legislation on landfill,
- Strategies to reduce carbon capture at source have not been addressed.
- Corrections to the actual removals (biogenic carbon) and carbon savings (fossil carbon) have not been applied.
- Changes in the profile of net electricity exports after installing the carbon capture plant have not been considered.

Socioeconomics

Positive Impacts

The following positive impacts have been identified:

- Net additional jobs (914.9) generated in the construction and development phase of the project, of which 686.1 would be within Greater London and 228.7 outside Greater London.

Negative Impacts

The following negative impacts have been identified:

- Based on current proposals the proposed development would result in the acquisition of Munsters Joinery and therefore the loss of between 50 to 54 highly skilled jobs (number of jobs estimated by Cory).
- Based on current proposals with the loss of Munsters Joinery (50-54 highly skilled jobs (number of jobs estimated by Cory) there would be a net loss of between 23-27 permanent jobs for the area as this proposal seeks to provide 27 jobs once operational.
- Based on current proposals there would also be a downgrading in job skills level as the Council does not consider the jobs proposed to be “skilled jobs”.
- There may be transportation issues generated within the region, linking to congestion and associated economic impacts caused.

Neutral Impacts

The following neutral impacts have been identified:

- The documentation provided to date by the Applicant has excluded an assessment of potential impacts on tourist sectors, although this is considered to be a negligible impact.

Ground Conditions and Soils

Positive Impacts

No positive impacts have been identified.

Negative Impacts

No negative impacts have been identified.

Neutral Impacts

Major and moderate negative effects are identified associated with ground gases and asbestos in soils during the construction and operational phases of the development, potentially affecting site users, construction workers and buildings. Proposed mitigation measures are stated by the Applicant to reduce impacts to negligible.

Landside Transport

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Impact of construction generated traffic from HGV and workforce movements on the local network.
- Poor management of deliveries during construction may lead to backing up of traffic onto Norman Road.
- Potential overspill into the surrounding highway from private workforce vehicles.
- Localised impact on Norman Road on pedestrians, cyclists and public transport users travelling to and from these nearby developments.

Neutral Impacts

The following neutral impacts have been identified:

- Whilst it is welcome that footpaths would be retained, albeit re-routed, the Council would like to have more powers over how the process for re-routing footpaths would occur in order to make sure that the best possible routes for users are created.

Land use and Consideration and Alternatives

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Inappropriate development on Metropolitan Open Land (MOL).
- Loss of part of Crossness Nature Reserve and Metropolitan SINC.
- Lack of scrutiny of alternative sites.
- Application of mitigation hierarchy has not been applied.

Neutral Impacts

No neutral impacts have been identified.

Planning History

19/00998/ALA24 Submission to discharge Requirement 25 Use of compost material and gas from Work No. 1B, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Currently under consideration.**

19/00998/ALA23 Submission to discharge Terms of Reference for the CHP Working Group, as required under Requirement 24 of the Riverside Energy Park Order 2020 (as amended). **Observations sent 30/10/2024.**

19/00998/ALA22 Application for Prior Approval under Requirement 12(2)(b) to vary construction hours in accordance with Requirement 12, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observations sent 29/08/2024.**

19/00998/ALA21 Submission of Amendments to Approved Details (July 2022) in accordance with Requirement 27, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observations sent 13/06/2024.**

23/00892/ALA03 Adequacy of consultation request regarding application by Cory Environmental Holdings Limited (CEHL) for an Order Granting Development Consent for the Cory Decarbonisation Project. **Observation sent 03/04/2024.**

23/00892/ALA02 Statutory consultation on a proposed application for development consent under Section 42 Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. **Observation sent 15/12/2023.**

23/00892/ALA01 Consultation for review of Statement of Community Consultation in respect of an Order granting Development Consent for the Cory Decarbonisation Project. **Observation sent 28/09/2023.**

23/00892/ALA Request to the Planning Inspectorate for a Scoping Opinion: Application by Cory Environmental Holdings Limited (the Applicant) for an Order granting Development Consent for the Cory Decarbonisation Project. The Applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development. **Observation sent.**

21/03470/FUL01 Details of condition 4 (management and monitoring plans) pursuant to planning permission 21/03470/FUL for the Realignment of Ditch 9. **Details approved 12/01/2023.**

22/02544/ALA Notice of Application to make a non-material change to the following Development Consent Order: The Riverside Energy Park Order 2020 (SI 2020/419) As Corrected By The Riverside Energy Park (Correction) Order 2021 (SI 2021/273). **Observation sent 20/10/2022.**

19/00998/ALA20 Submission of Amendments to Approved Details (July 2022) in accordance with Requirement 27, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 12/09/2022.**

19/00998/ALA19 Submission to discharge Requirement 5(1)(e) Biodiversity and Landscape Mitigation, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 02/09/2022.**

22/00728/FUL Hybrid application for a phased development comprising (Phase 1) full planning permission for the installation of a district heat network pipeline in Norman Road connecting to Riverside Resource Recovery Facility; and (Phase 2) outline planning permission (all matters reserved) for the provision of a bridge carrying a district heat network pipeline over the ditch to the south of Norman Road with a pedestrian walkway structure above the bridge, decked area and associated alterations and improvements around the existing pedestrian gate at the south west of Norman Road and associated works. **Granted 08/07/2022**

19/00998/ALA18 Consultation on the Submission to the Environment Agency to discharge Requirement 20 River Wall, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 05/04/2022.**

19/00998/ALA17 Submission to discharge Requirement 16 Waste Hierarchy Scheme, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 20/04/2022.**

19/00998/ALA16 Submission of Amendments to Approved Details (Jan 2022) in accordance with Requirement 27, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 09/03/2022.**

19/00998/ALA15 Submission of Details of Phasing of Construction and Commissioning Plan in accordance with Requirement 23, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 26/01/2022.**

19/00998/ALA14 Submission of Detailed Design Report and associated plans in accordance with Requirement 2, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 26/01/2022.**

19/00998/ALA13 Submission of Details of proposed amendments to specific elements of Riverside Energy Park in accordance with Requirement 27, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 21/01/2022.**

19/00998/ALA11 Submission of Details to discharge Requirement 13 - Construction Traffic Management Plan, Electrical Connection route, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 31/01/2022**

16/02167/FUL03 A scheme for the provision of the necessary plant and pipework pursuant to condition 31 (Combined Heat and Power) pursuant to planning permission 16/02167/FUL for the proposal under Section 73 of the Town and Country Planning Act

1990 regarding the Energy from Waste facility approved under reference 99/02388/CIRC24 dated 13.3.2015 to amend Condition 27 to allow up to 195,000 tonnes of waste to be delivered to the development by road in any calendar year and the continued operation of the plant without compliance with conditions 10 and 30 to allow the delivery of waste by river and by road on a 24/7 basis. **Observation sent 27/01/2022.**

16/02167/FUL02 Details of condition 31(Combined heat and power feasibility) pursuant to planning permission 16/02167/FUL for the proposal under Section 73 of the Town and Country Planning Act 1990 regarding the Energy from Waste facility approved under reference 99/02388/CIRC24 dated 13.3.2015 to amend Condition 27 to allow up to 195,000 tonnes of waste to be delivered to the development by road in any calendar year and the continued operation of the plant without compliance with conditions 10 and 30 to allow the delivery of waste by river and by road on a 24/7 basis. **Observation sent 27/01/2022.**

21/03470/FUL Realignment of Ditch 9. **Granted 27/01/2022.**

19/00998/ALA12 Submission of Details to discharge Requirements 4, 5 and 6 - Biodiversity and Landscape Mitigation Strategy, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 12/01/2022**

19/00998/ALA10 Submission of Details to discharge Requirement 13 - Construction Traffic Management Plan(s) (Main REP Site), Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 18/11/2021.**

19/00998/ALA09 Submission of Details of highway access at Main REP Site, including Norman Road to discharge Requirement 8 - Highway Access, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 02/11/2021.**

19/00998/ALA07 Submission of an Operational Lighting Strategy to discharge Requirement 18 Operational Lighting Strategy, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 12/10/2021.**

19/00998/ALA06 Submission of a Code of Construction Practice - Electrical Connection Route to discharge Requirement 11 Code of Construction Practice, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 01/10/2021.**

19/00998/ALA05 Submission of a Code of Construction Practice - Main REP Site to discharge Requirement 11 Code of Construction Practice, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 01/10/2021.**

19/00998/ALA04 Submission of a Geotechnical Interpretive Report and Contaminated Land Report to discharge Requirement 10 - Ground Conditions and Ground Stability, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 24/09/2021.**

19/00998/ALA08 Submission of a Operational Noise Monitoring Scheme to discharge Requirement 19 Control of Operational Noise, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 21/09/2021.**

19/00998/ALA03 Submission of a Drainage Design Strategy to discharge Requirement 9 - Surface and Foul Water Drainage, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 21/09/2021.**

19/00998/ALA02 Submission of a Employment and Skills Plan to discharge Requirement 21 Community Benefits, Schedule 2 of the Riverside Energy Park Order 2020 (as amended). **Observation sent 21/09/2021.**

20/03209/FUL Installation, operation and maintenance of private wire connection and associated electrical infrastructure on land at and immediately adjoining, Riverside Resource Recovery Facility, Norman Road, Belvedere. **Granted 01/09/2021**

20/03208/FUL Installation, operation and maintenance of a battery energy storage system on land at Riverside Resource Recovery Facility, Norman Road, Belvedere. **Granted 24/08/2021.**

21/01744/ALA Consultation on the Application to vary consent granted under Section 36 of The Electricity Act 1989 - the original consent being for the construction and operation of a resource recovery plant. **Observations sent 05/07/2021.**

19/00998/ALA01 Written Scheme of Investigation for the Main REP Site. **Observation sent 29/06/2021.**

21/00068/SCOPE Request by the Secretary of State for a Scoping Opinion for an Environmental Impact Assessment (EIA) in accordance with the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (The 2017 Regulations). **Observations sent 27/01/2021.**

16/02167/FUL01 Details of condition 37 (low emission strategy) pursuant to planning permission ref. 16/02167/FUL for the proposal under Section 73 of the Town and Country Planning Act 1990 regarding the Energy from Waste facility approved under reference 99/02388/CIRC24 dated 13.3.2015 to amend Condition 27 to allow up to 195,000 tonnes of waste to be delivered to the development by road in any calendar year and the continued operation of the plant without compliance with conditions 10 and 30 to allow the delivery of waste by river and by road on a 24/7 basis. **Observation sent 06/12/2019.**

2018/01743/SCREEN Statutory consultation on a proposed application for development consent Section 42 Planning Act 2008 (and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017). **Observation sent 08/08/2018.**

17/02902/ALA Request to the Planning Inspectorate for a Scoping Opinion: Application by Cory Environmental Holdings Limited for an Order granting

development consent for the Riverside Energy Park for the Secretary of State's opinion as to the information to be provided in an Environmental Statement relating to the proposed development. **Observation sent 21/12/2017.**

16/02167/FUL Proposal under Section 73 of the Town and Country Planning Act 1990 regarding the Energy from Waste facility approved under reference 99/02388/CIRC24 dated 13.3.2015 to amend Condition 27 to allow up to 195,000 tonnes of waste to be delivered to the development by road in any calendar year and the continued operation of the plant without compliance with conditions 10 and 30 to allow the delivery of waste by river and by road on a 24/7 basis. **Granted 04/10/2017.**

14/02357/LDCP Certificate of Lawfulness (Proposed) for the modification of a section of external cladding on the eastern elevation of the main facility building. **Granted 03/03/2015.**

99/02388/CIRC24 Application to the Secretary of State for Energy and Climate Change for consent under Section 36 of the Electricity Act 1989 to vary the consent for the energy from waste facility granted on 15 June 2006, namely variation of conditions 2, 4 and 5 under consent GDBC/003/00001c-06 to allow an increase in the maximum throughput of the facility from 670,000 tonnes per annum (t.p.a.) to 785,000 t.p.a. of waste and the option for river borne waste to be transported to the facility from the Port of Tilbury in addition to the existing network of riparian waste transfer stations in Greater London. **Observation Sent 01.12.2014.**

07/11615/FULMIN Minor amendment to: Proposals for Energy from Waste Generating Station without complying with Condition 40 of permission GDBC/003/00001C-06 to allow Norman Road improvements to run in parallel with the construction of the building. **Granted 11/06/2012.**

11/01387/FUL Proposal under Section 73 of the Town and Country Planning Act 1990 regarding the Energy from Waste facility approved under reference 07/11615/FUL to allow movement of materials, waste and residual material following incineration between the jetty and the plant and the ash container storage area shall only take place between the hours of 6am-9pm Mondays to Saturdays except in any emergency of following a jetty outage and on Sundays between the hours of 7am-7pm. **Granted 14/10/2011.**

11/00083/GPDOPD Notice of permitted development comprising the construction of a new 11kv micro substation. **Planning Permission not required.**

07/11615/FUL01 Details of condition 40 (Travel Plan) pursuant to planning permission reference 07/11615/FUL dated 11 January 2008 for the proposed Energy from Waste Generating Station. **Observation sent 12/05/2009.**

09/00612/FUL Proposal under Section 73 of the Town and Country Planning Act 1990 regarding the proposals for Energy from Waste Generating station approved under reference 07/11615/FUL to remove condition 45 which requires on site provision of a tow truck at all times during the operation of the development. **Granted 03/07/2009.**

08/03256/FUL Widening of Norman Road, realignment of existing ditch and ecological enhancements. **Granted 12/05/2008.**

07/11615/FUL Proposals for Energy from Waste Generating Station without complying with Condition 40 of permission GDBC/003/00001C-06 to allow Norman Road improvements to run in parallel with the construction of the building. **Granted 11/01/2008.**

99/02388/CIRC23 Details of HGV Monitoring pursuant to Condition 43 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 30/12/2011.**

99/02388/CIRC22 Details of HGV Monitoring pursuant to Condition 43 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 31/08/2011.**

99/02388/CIRC21 Details of a Travel Plan pursuant to Condition 39 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 31/08/2011.**

99/02388/CIRC20 Details of a Breeding Bird Survey pursuant to Condition 32 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 24/07/2008.**

99/02388/CIRC19 Details of a Foul Water Drainage scheme pursuant to Condition 24 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 08/05/2008.**

99/02388/CIRC17 Details of a Dust Control Scheme pursuant to Condition 12 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 07/02/2008.**

99/02388/CIRC16 Details of a Scheme of Lighting pursuant to Condition 26 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 07/02/2008.**

99/02388/CIRC15 Details of Works to Flood Defences pursuant to Condition 27 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 14/11/2007.**

99/02388/CIRC11 Details of a scheme of Surface Water Drainage pursuant to Condition 21 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 09/10/2007.**

99/02388/CIRC10 Details of a scheme of Surface Wate Source Protection pursuant to Condition 22 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 09/10/2007.**

99/02388/CIRC14 Architectural Details pursuant to Condition 48 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 25/09/2007.**

99/02388/CIRC07 Details of hard and soft landscaping and ecological habitat creation pursuant to Conditions 30 31 34 35 and 33/36 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 25/09/2007.**

99/02388/CIRC05 Details of Jetty Structure, materials and design pursuant to Condition 8 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 16/08/2007.**

99/02388/CIRC08 Details of Remediation Method Statement pursuant to Condition 25 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 05/07/2007.**

99/02388/CIRC04 Details of Flood Defence Survey pursuant to Condition 28 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 05/07/2007.**

99/02388/CIRC03 Details of InterTidal Foreshore Report pursuant to Condition 29 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 03/07/2007.**

99/02388/CIRC12 Details of a scheme of Archaeological Investigations pursuant to Condition 49 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 20/06/2007.**

99/02388/CIRC02 Details of Lorry Parking Areas pursuant to Condition 53 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 26/04/2007.**

99/02388/CIRC01 Details of a Noise Monitoring Scheme pursuant to Condition 16 of the Department of Trade and Industry consent (Section 36 of the Electricity Act 1989) dated 15th June 2006 for the construction and operation of an Energy from Waste Power Station. **Details approved 21/03/2007.**

99/02388/CIRC Application to the Secretary of State for Trade and Industry for consent under Section 36 of the Electricity Act 1989 for the construction and operation of a resource recovery plant of nominally rated output of 72MW gross. **Observation sent 15/06/2006.**

95/00807/GPDO G.P.D.O. Consultation Deemed Planning Permission for the construction and operation of a 130mw electricity generating station comprising: 1.2 million tonnes per annum municipal waste incinerator; ancillary buildings; reconstruction and wide. **Observation sent 31/08/1995.**

Planning Policy

Air Quality

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Bexley Local Plan Policy SP8 sets out a number of considerations with regards to green infrastructure, including reference to air quality. Development proposals will be expected to:

- prevent or minimise emissions that could worsen air quality, including particulate matter, NOx, and other pollutants, to protect public health and the environment.
- incorporate measures like green infrastructure, buffer zones, and air filtration systems to reduce impacts.
- encourage sustainable transport options, such as walking, cycling, and public transit, to reduce vehicle emissions and improve air quality.
- Integrate green spaces, trees, and green roofs to assist in the absorption of pollutants, to provide natural mitigation methods to improve local air quality.
- Consider temporary emissions during construction, such as dust and vehicle exhausts, through measures such as dust suppression and low-emission machinery.
- Monitor air quality, especially where pollution levels are close to or exceed legal limits.

Bexley Local Plan Policy SP10 includes considerations with regards to air quality through air quality impacts and the implementation of appropriate transport. With regards to air quality, the policy promotes an emphasis on the expansion of public transport infrastructure, walking and cycling in order to reduce car reliance and thus lower emissions, improving air quality. In addition, the associated reduction in congestion would lead to lower emissions and improved local air quality.

Bexley Local Plan DP25 sets out that new waste facilities (including expansion or enlargement of existing facilities, which for the purposes of this assessment, the carbon capture facility is considered as such), should be located in areas such as Strategic Industrial Locations (SIL), where impact on nearby sensitive receptors such as residential dwellings would be expected to be lower, particularly upon consideration of air quality. Facilities which have potential adverse air quality impacts are expected to be constructed with the necessary features and facilities to reduce the escape of airborne pollutants to help protect local air quality.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy D3 requires development to aim to prevent or mitigate impacts of poor air quality to ensure a healthier local air environment for nearby residents. In addition, the policy supports active travel such as walking and cycling, which will lead to local improvements in air quality. Furthermore, through the encouragement of urban greening such as the implementation of green roofs or vegetation etc., air quality may be improved in the local area.

London Plan Policy E5, although with regards to air quality largely referring to non-industrial schemes proximate to SILs, sets out that developments in our proximate to SILs, design features and interventions, such as air quality mitigation measures etc., should be considered to ensure there is no undue impact on local air quality.

London Plan Policy SI 1 aims to enhance air quality in development through the following considerations and measures:

- Proposals must not worsen existing air quality or create new areas of exceedance or expose residents to high pollution and poor air quality levels.
- All proposals are expected to be at least 'Air Quality Neutral' and prioritise design-based pollution mitigation, and, for major developments, include an Air Quality Assessment. Proposals in high-risk areas, including those near vulnerable populations, must minimise exposure through good design.
- For large scale developments, an 'air quality positive' approach should be applied, demonstrating efforts that have been made to enhance local air quality and reduce pollution exposure.
- During construction and/or demolition, proposals should demonstrate compliance with non-road mobile machinery low emissions and apply best practices to minimise emissions during construction and development, which may negatively impact local air quality.
- It is further expected that on-site emission reduction actions are taken to reduce emissions on-site. If on-site measures are insufficient, off-site emission reduction measures may be used if they provide equivalent local air quality benefits.

London Plan Policy SI 8, whilst relating to waste capacity and net waste self-sufficiency, sets out considerations specifically to air quality impacts and mitigation measures. It is expected that development proposals for expanded waste sites duly assess air quality impacts, particularly where significant emissions are expected. These sites are expected to include design features such as full enclosure to minimise air quality impacts on the surrounding area. In addition, low-emission transportation methods are expected to be considered.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

In most respects, the Applicant has designed the proposed development to avoid significant impacts on local air quality, and hence on the health of local people and nature conservation, in accordance with the policies outlined in the Policies section above. Notwithstanding that some negative and neutral impacts have been identified. These impacts are in some instances are considered to be important and therefore all negative and neutral impacts identified need to be addressed by the applicant in order to the Council to make a full assessment of the impacts of the proposed development on air quality.

Positive Impacts

The following positive impacts have been identified.

- Removal of 1.3 million tonnes of Carbon Dioxide from the atmosphere.

Negative Impacts

The following negative impacts have been identified:

- The location of short term generators has not been provided. At the very least short term generators need to be located at least 25 metres from Crossness nature reserve.
- No response to the Councils Relevant Representation with regard to the potential emissions of chemicals used to capture CO2 emissions have been provided.

Neutral Impacts

The following neutral impacts have been identified:

- The applicant has demonstrated that the Environment Agency's nitrosamine guidance has been followed and that the scheme represents an acceptable level of risk according to EA guidance. However, the evaluation of model results in Table 5-36 and Figure 5-12 are not consistent with the EA guidance.
- Mitigation measures required through best practice for dust will be implemented but additional measures should be included to minimise dust nuisance and human health impacts from construction activities.

Noise and Vibration

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Local Plan Policy DP11 requires that development proposals in or proximate to residential areas to ensure compatibility with residential character, including through

minimisation of noise and vibration. All development proposals, regardless of location, must protect the amenity of existing and/or future residents by preventing unacceptable noise and vibration impacts.

Local Plan Policy DP25, with specific reference to noise and waste management facilities, makes reference to the 'Agent of Change' principle, setting out that development of this type must account for potential noise impacts on other nearby existing uses, ensuring undue impacts are appropriately avoided or mitigated against. Waste facilities and/or related infrastructure must ensure negative impacts are minimised through design considerations, such as by being fully enclosed to assist in the containment of noise and vibration.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy D13 sets out the Agent of Change principle in detail. The responsibility of ensuring no undue impact on the local noise environment is placed on the new development. It is a requirement that new development proposals that may generate noise impacts duly mitigate those impacts upon nearby established uses, with a particular emphasis on nearby residential development. Proposals are expected to, through early design and early mitigation considerations, demonstrate appropriate noise management, which may need to be secured through planning obligations. Wherever possible, new development should ensure the most noise generating activity are appropriately sited within the wider development site, as well as employ appropriate screening, layout adjustments and acoustic measures to duly separate noise-generating activity from noise sensitive areas. Development that fails to demonstrate effective noise mitigation are unlikely to be permitted.

London Plan Policy D14, the scope of which is specific to noise, sets out that development proposals should prevent significant noise impacts that may impact quality of life, ensuring noise management is prioritised. As already set out in London Plan Policy D13, developments must follow the Agent of Change principle. Proposals are expected to mitigate noise impacts from developments, whilst also not restricting existing noise-generating activities. It is expected that developments improve the acoustic environment through consideration of soundscapes and ensuring the protection of existing tranquil spaces. Noise sensitive development should be separated from noise-generating development by employing various techniques including through layout, materials, screening, orientation and sound insulation. Developers are encouraged to, at an early stage, investigate and adopt new technologies that results in reduced noise generation and transmission.

London Plan Policy E5 relates specifically to SILs, with this development located within a SIL. In relation to noise and vibration, development proposals within SILs should ensure other surrounding industrial uses can operate through new development addressing and considering the existing soundscape. Of particular importance when assessing development proposals in SILs is the location of existing residential

development, with such sensitive development requiring due attention through the appropriate use of soundproofing, layout and other design measures to avoid and/or mitigate noise and vibration.

London Plan Policy SI 8 refers to noise and vibration considerations when development proposals relate to increasing waste processing capacity and/or related developments. Waste facilities have the potential to be substantial generators of noise and/or vibration due to 24-hour operation and the use of heavy equipment. Containment is requirement, including when considering noise outbreak. Due consideration of potential impact to nearby receptors, with a particular emphasis on residential development, is required. In addition, consideration of freight movement should form part of the assessment, including HDVs and/or noise generated by marine transportation.

London Plan Policy T2, whilst referring specifically to transportation considerations, makes reference to noise as part of one of the 'Ten Healthy Street Indicators' ('Not Too Noisy'). As identified in London Plan Policy SI 8, the noise generated by transportation associated with the development ought to be considered.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

The noise and vibration assessment of the proposed development has taken account of the Bexley Local Plan by meeting the guidance on noise within National Planning Policy and within relevant British Standards. However, although not directly included in the above policy documents, LBB guidance for operational noise from fixed plant requires a rating level of no higher than 5dB below the LA90 background level at the nearest sensitive receptor. It is considered that the proposals may not meet this standard due to uncertainty in the background noise assessment. Comprehensive background noise levels should therefore be re-assessed during pre-operational surveys.

Positive Impacts

As the proposed development represents an additional industrial noise source to the local area, there is little opportunity to provide a positive noise impact.

Negative Impacts

There is clearly potential for negative noise impacts due to noise emissions from the proposed development affecting the nearest residents, particularly as this is a 24-hour operation. Similarly, there is potential for additional road traffic, generated by the development during construction and operations, to cause negative impact on local access routes. Negative impacts may also occur during construction of the proposed development, however, this would be of a temporary nature.

Neutral Impacts

The following neutral impacts have been identified:

- The draft DCO sets out that construction hours would be between the hours of 07:00-19:00 hours Monday-Friday and 07:00-13:00 hours on a Saturday with no construction taking place on Sundays or Bank Holidays. These hours exceed the Councils limitations for noisy works which are restricted to between 08:00 and 18:00 hours on weekdays and 08:00 to 13:00 on Saturday. Dispensations to these times can be agreed as necessary with particular reference to tidal jetty works that would require some 24-hour working for logistical reasons.
- The applicant has provided a 'Statutory Nuisance Statement' as part of the DCO submissions. This considers the adoption of 'best practicable means' in order to avoid any enforcement proceedings by the Local Authority under the provisions of the Environmental Protection Act 1990.
- In terms of operational noise and vibration, the (draft) DCO will include a requirement that the operational rating sound levels are such that they will not exceed typical measured background levels at the closest residential dwellings. The nearest residential dwellings are located on Clydesdale Way. This relates principally to noise from ASHP's that have the potential to operate for limited periods. A series of mitigation measures including plant selection, location and acoustic barriers have been proposed. These are considered sufficient to achieve compliance with the target criteria. Control of noise during operation would be secured via Requirement 20 of the (draft) DCO.

Terrestrial, Riparian and Marine Biodiversity

Policies

Local Plan Policy SP8 refers to development proposals on Metropolitan Open Land (MOL) and those associated considerations and impacts, including with reference to biodiversity. Development proposals are expected to include proposals for habitat creation, with the retention and enhancement of existing biodiversity and facilitation of biodiversity. In addition, the policy supports the restoration and enhancement of waterways and rivers to support biodiversity and improved ecological health, as well as connectivity between marine and terrestrial biodiversity. An emphasis should be placed on expanding ecological corridors and connecting green spaces to improve habitat connectivity, which is essential for supporting the diversity of species. The use of green infrastructure, as well as waterside and recreational use(s), should be implemented with biodiversity being a key priority.

Local Plan DP18 sets out the considerations that waterfront development must have, including with reference to biodiversity. Development proposals are expected to enhance wildlife through the improvement of water quality and green infrastructure, with appropriate setbacks from water edges to protect and enhance biodiversity and habitat continuity. Walkways and cycleways, whilst primarily for the use of pedestrians and cyclists, can also facilitate the movement of wildlife. It is expected that development prevents any adverse impact on water quality to avoid wildlife-damaging impact, through control of pollution and avoidance of discharges and runoff. Development

proposals are expected to avoid or mitigate the fragmentation of ecological corridors and avoid reducing water spaces to preserve habitats for aquatic species.

Local Plan SP9 refers to development proposals have specifically on biodiversity, including biodiversity within Sites of Importance for Nature Conservation (SINCs). The Policy specifically and importantly emphasises the protection, conservation, restoration and enhancement of SINCs as part of the Borough's ecological network. Development proposals that have negative impact on SINCs must demonstrate the efforts made to avoid, minimise and mitigate impacts. It is further expected that measurable net gains are achieved for biodiversity, with development proposals requiring to demonstrate on or offsite mitigation. The Policy sets out that impact on protected species will be strongly resisted. It is expected that development proposals that impact biodiversity, particularly within SINCs, incorporate significant enhancements that align with targets for habitat creation and species protection.

Local Plan DP20 establishes that development proposals must follow a strict mitigation hierarchy (avoid, mitigate, compensate) to justify any unavoidable biodiversity impact, ensuring that developments furthermore achieve a net gain for biodiversity. Proposals should demonstrate through design, layout and landscaping that biodiversity is enhanced, including through the creation of ecological linkages and improved wildlife corridors. Development proposals that impact protected sites, including SINCs, will only be permitted in situations that less damaging alternatives are unavailable. Irreplaceable habitats, including veteran trees, will be safeguarded from loss.

Local Plan DP21 sets out the biodiversity benefits development proposals may contribute through appropriate urban greening. The retention and enhancement of landscape, including the water environment, will be expected to contribute to improvements in the amount of biodiversity and facilitate increased levels of biodiversity. It is expected that landscaping is implemented in an appropriate way and with appropriate species to ensure that planting supports the local environment and biodiversity, avoiding introducing inappropriate or incompatible species.

Local Plan DP25, with reference to biodiversity considerations through development proposals that include the provision of waste management facilities, sets out that such proposals should consider local environmental impacts, including biodiversity. Consideration must be made to potential impacts through pollutants and noise generation that may negatively impact local biodiversity.

Local Plan DP29 specifies that development proposals must consider biodiversity impacts through ensuring the appropriate protection and consideration of water quality. Development proposals must ensure they do not negatively impact the quality of water in watercourses and groundwater, including through ensuring the quantity of water is not unduly changed. It is expected that proposals ensure water quality supports aquatic ecosystems and biodiversity within water environments. Development proposals must ensure appropriate connection to drainage and water treatment facilities to avoid release of contaminants into water courses that would unduly impact biodiversity, particularly marine or riverside biodiversity.

Relevant policies are taken from the Bexley Local Plan (2023)

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy G6 states that SINC's should be protected. In the event that harm to a SINC is found to be unavoidable and where development proposals are demonstrated to clearly outweigh the harm to biodiversity, a strict mitigation hierarchy must be applied.

1. Avoid damaging the significant ecological features of the site
2. Minimise the overall spatial impact and mitigate through improvement of the quality and the management of the rest of the site (SINC).
3. Delivery of off-site compensation to improve biodiversity value and variety.

Development proposals are expected through this Policy to manage impacts on biodiversity and ensure a biodiversity net gain, which should be duly informed by the best available ecological information and addressed in the early stages of a development proposal.

London Plan Policy SI 12, whilst setting out impacts relating to flood risk, also touches on a number of biodiversity considerations. The Policy sets out that development proposals should provide for appropriate space for water, with appropriate setback from watercourses to reduce flood risk and supporting natural habitats for riparian (riverbank) biodiversity. Through the implementation of natural flood management, floodplain habitat can contribute to improved biodiversity. Development proposals should contribute to those measures set out in the Thames Estuary 2100 Plan, including through preservation of areas for natural habitats.

London Plan Policy SI 13 relates to how development proposals should consider and implement sustainable drainage, with an overlap with the requirements for both land and water biodiversity. Sustainable drainage proposals are expected to be implemented that will support biodiversity and enhance habitat connectivity, while promoting a drainage strategy that can ensure water quality along riverbanks and within the river channel to support biodiversity. Natural hydrological processes should be ensured through sustainable drainage techniques that creates natural habitat features in the local environment. It is expected that, as far as reasonably possible, impermeable surfaces are avoided, which will support soil and aquatic biodiversity.

The full policy description is included in Appendix 2 of this representation.

Local Impacts

The proposed development would result in the loss of circa 3.3 hectares of the designated Erith Marshes Metropolitan Site of Importance for Nature Conservation (MSINC), which is also part of the established Crossness Nature Reserve. It is proposed to address the impact of development, by providing biodiversity mitigation,

compensation and biodiversity net gain within the remaining part of the nature reserve and on the Norman Road field to the south of the application site, which in turn would be incorporated into the Crossness Nature Reserve, thereby increasing the net area of the nature reserve by circa 5-6 hectares. The Norman Road fields already form part of the Erith Marshes (MSINC), the loss of land designated for Metropolitan importance for nature conservation will not be replaced by the proposal, thereby resulting in a net loss of circa 3.3 hectares of MSINC.

It should be noted that this development is not a prerequisite for the inclusion of the Norman Field as part of the Crossness Nature Reserve. The Council has the power to declare an area of land as Local Nature Reserve, with agreement of the landowner. Therefore, a larger nature reserve could be declared without the loss of part of the existing extent of the nature reserve to development. Indeed, the landowner's openness to the Norman Field being incorporated into and managed as part of the nature reserve was identified as an opportunity in section 5.3 of the 2002 Ecology Master Plan secured through the Veridion Park development (planning ref: 02/03373/OUTEA) S106.

The loss of land designated for its London-wide significance to nature conservation is a key concern for the Council. Metropolitan Sites of Importance for Nature Conservation (MSINC) receive significant protection through planning policy. London Plan Policy G6(A) states that SINC should be protected; and Local Plan Policy DP20(2) says that development proposals that would have a direct or indirect impact on a site designated for its nature conservation interest should protect and enhance the designated site's value.

Policy G6(C) and DP20(2) provide criteria that must be satisfied before the London Plan mitigation hierarchy under policy G6(C) parts 1, 2, and 3. The applicant must first be able to demonstrate that harm to a SINC is unavoidable. This includes demonstrating there are no reasonable alternative solutions or sites, see Land Use and Consideration of Alternative section for further details. The applicant must also demonstrate that the benefits of the development proposal clearly outweigh the impacts on biodiversity.

Local Plan Policy DP20 implementation text under Paragraph 5.125 expects development proposals to secure mitigation, compensation, and biodiversity net gains for the lifetime of the development, including future maintenance, monitoring, and funding mechanisms. The mitigation, compensation and biodiversity net gain measures proposed in this application are to be secured for a period of only 30 years. This means that the benefits to biodiversity are temporary and limited to the medium term. Therefore, once the initial management period has concluded, the ecological value of land is likely to degrade; and, as the development will still occupy part of the existing MSINC, the ecological value of the MSINC in its entirety will be less than if the development does not take place. To secure long-term benefits, management of the land should last at least for the operating life of the operational project, although ideally much longer, unless the developed land was to be restored to its pre-developed condition.

Notwithstanding the above, it is considered positive that the applicant is proposing to mitigate and compensate the negative ecological impacts of the development as close to the site as possible within the adjoining Crossness Nature Reserve and Norman Road Field. However, the applicant needs to clearly demonstrate that all biodiversity measures proposed are completely additional. This means that the biodiversity measures must be wholly separate from any ongoing or planned conservational activities that are not a part of this application. In other words, biodiversity measures should be a direct result of actions and would not have occurred otherwise. This is particularly relevant as the proposed biodiversity measures are intended to strengthen the management and preservation of the areas already protected, with management regimes secured by existing legal agreements.

The Crossness nature reserve as existing is currently managed by Thames Water. The ongoing management of the nature reserve is secured via a S106 agreement. This was agreed upon under planning application 91/1318U, where the Local Planning Authority granted consent for Thames Water to develop the land shown in plan A, the first schedule of the S106, for the purposes of a sewage sludge incinerator. The S106 agreement requires Thames Water to maintain and enhance the nature reserve land in accordance with the Management Plan for a period of 99 years. This is to mitigate and compensate the impact of the consented development.

This proposal seeks to delete clause 4 of the 1996 agreement between the Council and Thames Water. Clause 4 of that S106 ensures that the Crossness Nature reserve is managed for 99 years by Thames Water and sets out processes for reviewing management plans etc. Whilst this may be acceptable in principal this would be predicated on the need for a new S106 (or S111) agreement between the Council, Thames Water and the Applicant which secures that the nature reserve is still managed and processes for reviewing management plans etc, are maintained for at least the remainder of the 99-year period, and what was agreed previously is secured to offset the impact of the Thames Water sewage sludge incinerator development; and, the biodiversity measures proposed within this application, which must be wholly additional to the ongoing or planned conservational activities that are not a part of this application, are also incorporated within the agreement.

The Norman Road Field was used to provide offsite biodiversity compensation, offsetting the negative impact of the Veridion Park development (planning ref: 02/03373/OUTEA). Veridion Park is some 700 metres to the south west of the application site. The Norman Road Field was subject to a S106 agreement which secured offsite biodiversity measures in accordance with an Ecological Master Plan (dated September 2002) to be implemented prior to phase 1 of the development. Section 5 of the Ecological Master Plan sets out the proposed habitat creation and enhancement, section 5.3 relates to the Norman Road Fields. Phase 1 of the development was completed. It is not yet clear whether the offsite works to the Norman Road Field (Area 5) were undertaken alongside phase 1. Planning consent (planning ref. 10/00063/OUTEA) included an extension of time for the implementation of phases 2 and 3; however, this consent has since expired. It is the view of the Council that, as with the S106 associated with the Nature Reserve, the applicant must demonstrate that the

proposed measures for the Norman Road Field are completely additional, and not double counting ongoing management measures, such as those secured to offset the impact of the Phase 1 of the Veridion Park development. The Council would question whether the proposal for the Norman Road Field provided by the Applicant is replicating existing management provisions.

It is also noted that the applicant is entering into discussions with Peabody in order to provide off-site compensation as well as biodiversity net gain at Thamesmead Golf Course. It is the Council's understanding that Peabody has aspirations to use the golf course for biodiversity net gain as part of its "pathways to the Thames" initiative, however due to funds, Peabody has not been able to undertake the works to date. It is therefore considered a positive by the Council that if the Applicant were to provide off-site compensation as well as biodiversity net gain at Thamesmead Golf Course it would remain in the borough and in close proximity to the application site. Notwithstanding that if a DCO were granted, a S106 (or S111) agreement would be required in order to secure that both compensation and biodiversity net gain (including management plans) are achieved on the Thamesmead golf course.

With regard to terrestrial and marine biodiversity at relevant representations stage the Council raised a number of issues relating to baseline conditions and future baselines. These concerns have not been addressed in the relevant representations' response by the Applicant and therefore the Council cannot make a thorough assessment of the application on terrestrial, marine (or riparian) biodiversity. In addition, a completed version of the biodiversity metric calculation tool in excel format has not yet been submitted for review.

Positive Impacts

The following positive impacts have been identified:

- The applicant is seeking to provide biodiversity measures to achieve mitigation compensation and a biodiversity net gain within the remaining area of nature reserve, and Norman Road Field, which is part of the Erith Marshes Metropolitan SINCE, to the south of the proposed development.
- Norman Road Field would be incorporated into Crossness Nature Reserve thereby seeing the net area of nature reserve increasing by circa 5-6 hectares.
- The applicant is in discussion with Peabody in order to provide off-site compensation as well as biodiversity net gain at Thamesmead Golf Course.

Negative Impacts

The following negative impacts have been identified:

Loss of circa 3.3 hectares of Erith Marshes Metropolitan Site of Importance for Nature Conservation (MSINC). The land lost also forms part of Crossness Nature Reserve. The development proposes to re-provide land for the Crossness Nature Reserve but does not provide any replacement land for the MSINC.

- **Permanence** - Biodiversity measures are proposed to be secured for 30 years, this means the benefits to biodiversity are temporary and limited to the medium term. Once management concludes, the ecological value of the MSINC in its entirety is likely to be less than if the development was not to take place.
- **Additionality** - Clarification needs to be provided to ensure proposed measures are wholly separate from any ongoing or planned conservational activities that are not a part of this application, including those previously agreed in S106s for Norman Field and the Nature Reserve, attached to existing planning consents at Thames Waters Sewerage Sludge incinerator and at Veridion Park.
- **Impacts on Strategic Green Wildlife Corridor and Southeast London Green Chain.**
- A completed biodiversity metric calculation tool has not been submitted.
- Baseline conditions and future baselines for marine biodiversity are limited and further expansion of baselines to include additional information is required.

Neutral Impacts

The following neutral impacts have been identified:

- Neutral impacts will be entirely dependent on the successful implementation of mitigation, compensation and biodiversity net gain as outlined in the Applicant's Biodiversity net gain report, and Outline LaBARDS.
- The applicant is seeking in the DCO at paragraph 48 (2) (c) to abrogate clause 4 of the 1994 Section 106 agreement between the London Borough of Bexley and Thames Water. Clause 4 of that S106 ensures that the Crossness Nature reserve is managed for 99 years by Thames Water and sets out processes for reviewing management plans etc. A S106 (or S111) agreement would be needed to secure that the nature reserve is still managed and processes for reviewing management plans etc are maintained for the remainder of the 99-year period and what was agreed previously is secured to offset the impact of the Thames Water sewage sludge incinerator development; and, the biodiversity measures proposed within this application, which must be wholly additional to the ongoing or planned conservational activities that are not a part of this application, are also incorporated.
- The Norman Road field is also subject to biodiversity enhancement measures via a S106 (or S111). It is unclear whether mitigation measures were implemented and therefore baselines are questioned.

Historic Environment

Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Local Plan Policy DP13 states that development proposals must ensure that any structures of historical importance, whether this be in the foreground or middle ground, be protected, with unsightly or overly intrusive/prominent development not unduly

detracting from such structures or locally significant views. Proposals should consider integrating accessible viewing places and enhance the public experience of protected and/or views of historic landscape or built form features. Consideration should not be limited to registered or protected views, but also consider non-designated views to ensure harm to local heritage landscapes are not unduly harmed.

Local Plan Policy DP14 sets out how development proposals must be considered against impacts upon the historic environment and assets. Development proposals that may impact heritage assets should be considered in accordance with national, city-wide and local policies. This extends to the local historic environment, non-designated heritage assets, as well as archaeological preservation. Development proposals must assess sites for archaeological potential, retaining evidence in situ where feasible and conducting investigations and recordings if removal is found to be necessary.

Local Plan Policy SP6 provides for the consideration of how development proposals may impact the historic environment. It sets out that the Council will seek to enhance and promote heritage assets, including Lesnes Abbey, which is specifically referenced. It is expected that development proposals align with national, city-wide and local guidance with regards to their setting, significance, integrity and the prevailing character in and around the historical sites.

Local Plan Policy DP18 sets out that development proposals on or near waterfronts must ensure, amongst other things, that they preserve the heritage character of those waterways, ensuring design and layout enhances visual connections to historically significant features. Developments are expected not to detract from historic landscapes or disrupt landscapes of historical importance. Development proposals should maintain access to waterways where this has traditionally and historically been the case.

Policy SP6 of the Bexley Local Plan (2023) states that the Council will manage Bexley's heritage and archaeological assets, whilst seeking opportunities to make the most of these assets; including adapting to and mitigating the affects of climate change. The policy sets out a criteria (A-E) on how this will be achieved.

Policy DP14 of the Bexley Local Plan (2023) sets out that when considering whether to grant planning permission for a development, the Authority shall pay special attention to the desirability of preserving or enhancing the historical asset or its setting. The overarching theme of the Policy is to assess development impact upon heritage assets.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy HC1 stipulates that, where appropriate, Boroughs should liaise with Historic England and local communities to establish an understanding of the local historic environment, with this knowledge used to guide development that respects and enhances access and interpretation of local history. Where development proposals affect heritage assets, proposals should incorporate heritage considerations early in the development process. Furthermore, sites that may have importance from an

archaeological perspective should be identified and receive equivalent levels of consideration as designated heritage assets.

London Plan HC3 sets out the role that strategic and local views play and how these must be considered against development proposals. Development proposals within the foreground, middle ground or background of strategic views must be evaluated for the impact on significant perspectives, including historic buildings, landscapes and riverscapes.

Policy details of the above guidance documents are included in Appendix 2 to this representation.

Chapter 16 of the NPPF (2023).

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

London Plan (2021)

Policy HC1(c) of the London Plan (2023) sets out that development proposals affecting heritage assets and their setting should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.... Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

The proposed development has not considered the impact of the proposal on the setting of Lesnes Abbey a Schedule Monument and Grade II Listed Building. It is noted that in the DCO application for Riverside 2 an assessment was made but a comparable assessment has not been made this time which is considered to be unacceptable given that the proposed development in this instance is both physically closer and greater in height than Riverside 2 was.

Given this it is considered that a full assessment of the potential impacts on the setting of Lesnes Abbey cannot be undertaken and the applicant needs to make an assessment.

The proposed development has a "not significant-minor effect" on the Crossness group of assets (Crossness Conservation Area; Crossness Pumping Station, Grade I Listed Building; Crossness Pumping Station workshops, Grade II Listed Building; Crossness engine house, Locally-Listed Building – negligible-minor effect). As the policy offers no qualification / quantification of adverse impacts, the proposed development could therefore be held not to comply with this policy.

The Crossness Conservation Area Appraisal and Management Plan (2009) outlines the special architectural and historic interest of the Crossness Conservation Area and identifies ways in which its character and setting has been compromised and opportunities for enhancement. It offers some high-level guidance on conservation

of the Conservation Area's setting. The key relationship between the asset and the Thames – in terms of both visual and functional relationships – is highlighted as being important to the significance of the group. This is confirmed, albeit strategically, by the townscape analysis diagram.

While the proposed development would be visible in views from the asset down the Thames to the southeast, its presence would not change the ability to understand or appreciate this key relationship.

The London Borough of Bexley Sustainable Design and Construction Guidance SPD (2007) requires that the preservation and enhancement of statutory and locally listed buildings, archaeological sites, historic parks and other cultural heritage features be taken into account when considering sustainable design and construction, in order to preserve both the embodied energy these constructions represent and to maintain a sense of cultural identity for the borough and its residents.

Accordingly, the development proposals are considered to not be compliant with the Bexley Local Plan (2023) from a historic environment perspective.

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Impacts on Lesnes Abbey (Scheduled Monument and Grade II Listed Building) have not been assessed and need to be considered. It is worth noting that an assessment of the potential impacts on the setting of Lesnes Abbey was made under the DCO application for Riverside 2 and in this case the proposed development is both closer to Lesnes Abbey and in certain instances greater in height than the stack of Riverside 2 (once constructed).
- The Crossness group of industrial heritage assets (Crossness Conservation Area; Crossness Pumping Station, Grade I Listed Building; Crossness Pumping Station workshops, Grade II Listed Building; Crossness engine house) – assessed as receiving a not significant-minor adverse effect.

Neither effect is held to be significant for the purposes of EIA, but nevertheless will give rise to a degree of harm to the assets' heritage significance. Such harm to heritage assets of national importance will need to be considered properly in line with national and local planning policy, statutory provisions and recent case law.

Neutral Impacts

No neutral impacts have been identified.

Townscape and Visual (including Arboriculture)

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Policy SP5 of the Bexley Local Plan (2023), requires development to provide high-quality design which contributes positively to the local environment and the character of Bexley. Policy DP11 of the Bexley Local Plan (2023) provides an overarching design policy and relates to the built environment; it seeks to protect and enhance the quality of the built environment and ensure all new developments are satisfactorily located and are of a high standard of design and layout. This includes compatibility with the character of the surrounding area.

Policy DP12 of the Bexley Local Plan (2023) defines a tall building as being 45 metres within or near the town centres off Abbey Wood Village and Lower Belvedere. 25 metres within the borough's identified Sustainable Development Locations, Strategic Industrial Locations (SIL), and the Thamesmead and Abbey Wood London Plan Opportunity Area. And 15 metres across the rest of the borough.

In this instance because the application site is located wholly within the Thamesmead and Abbey Wood London Plan Opportunity Area.

Notwithstanding that, Policy DP12 (4) sets out a criteria which needs to be met in order for the principal of a tall building to be acceptable. This criteria includes but is not limited details relating an assessment of the proposal on the local character, environmental impacts, sufficient access to public transport etc.

Policy SP8 of the Bexley Local Plan (2023) seeks to protect Metropolitan Green Belt and Metropolitan Open Land (MOL) from inappropriate development among other things.

The full policy description for all of the aforementioned policies are included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

Chapter 12 of the NPPF states that "The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve."

Chapter 13 of the NPPF provides guidance on the acceptability or otherwise of development within the Green Belt. It states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (paragraphs 152-153).

Paragraphs 154-155 of the NPPF highlight the forms of development within the Green Belt which may be considered as exceptions to the normal presumption against inappropriate development.

London Plan (2021)

Policy G3 of the London Plan sets out that MOL is afforded the same status and level of protection as Green Belt. Part 1a of Policy G3 states that MOL “should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.”

Policy G2 of the London Plan states that Green Belt should be protected from inappropriate development. Part A1 of the policy sets out that developments that harm the Green Belt should be refused unless very special circumstances exist.

London Plan Policy D3 advocates a design-led approach. New development should respond to and enhance the local context in terms of layout, orientation, form, scale and appearance. Due regard should be had to the existing and emerging street hierarchy, building types, forms and proportions.

Policy D9 of the London Plan (2021) defines a tall building as being not less than six storeys or eighteen (18) metres high when measured from ground to the floor level of the uppermost storey.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

The application site is located partly with a Strategic Industrial Land (SIL) and Metropolitan Open Land (MOL) and wholly within a Metropolitan Site of Importance for Nature Conservation (MSINC). The application site, as is, is predominantly open with limited areas of temporary hardstanding used for construction workers parking and deliveries (for Riverside 2) and a building used by Munsters Joinery. To the north of the application site is the Riverside Campus (Riverside 1 and 2), to the east of the site is the Belvedere Industrial Area and to the west is Crossness Nature Reserve.

As mentioned above the application site is predominantly open and devoid of any built form and therefore it is considered that the proposed development would have a significant visual impact.

Whilst the height, scale and mass of the built form of the proposed development would vary, the proposed absorber columns are significant structures, which significantly exceed any of the policy parameters for building heights, as stipulated under Policy DP12 of the Bexley Local Plan (2023). As mentioned in the Policy section of this report a tall building in the Thamesmead and Abbey Wood London Plan Opportunity Area should be up to 25 metres in height.

At circa 113 metres and separated by quite a physical distance from the taller structures at Riverside 1 (fully operational) and Riverside 2 (under construction) (where the stacks to both buildings would be/are 90 metres), the absorber column towers would have a

significant impact upon the character and appearance of the area, both at more local and through wider range views.

The visual impacts of the absorber columns have been demonstrated by the applicant as illustrated across the submitted documentation, including within the Environmental Statement (Appendix 10-4 – Photomontages, and within the Design Approach Document (pages 100, 103, 109, 112). It is considered by the Council that these illustrations reinforce the Council's views on the significant visual impact that the absorber columns would have on the area both at short distances and further afield.

Whilst it is accepted that a set of design principals would be established as part of the DCO which would need to be adhered to when the final design is submitted as a requirement, on the basis the details submitted thus far it is considered difficult by the Council to make a full assessment of the overall visual impact of the development from a townscape perspective. Whilst photomontages have been provided it is considered that for the purposes of proper comparison, photomontages and modelling should be submitted with the site as is (with the addition of Riverside 2 to be shown as constructed), and then with the proposed buildings and structures proposed under this application. This will aid interpretation and ensure that comparisons and conclusions are accurate.

As referenced in the Land Use and Consideration of Alternatives section of this report the application site is located within MOL. MOL has the same status as Green Belt Land. There are a number of High Court decisions relating to the impact on openness and visual appearance within the Green Belt which are relevant. These have established a number of key principles, including that it is not simply about volume and visual impact is implicitly part of the concept of "openness of the Green Belt" and that 'openness of the Green Belt' is not limited to the volumetric approach; the word 'openness' is open-textured and many factors are capable of being a material consideration.

The National Planning Policy Guidance (NPPG) which supports the NPPF (2023) provides further clarification on assessing the impact of a proposal on the openness of the Green Belt. The NPPG highlights a judgment based on the circumstances of the case is needed. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

It is considered by the Council that the proposal does not adequately address the above to sufficiently consider the impact of the proposal on the MOL land designation.

With regard to trees as per the comments made by the Council at relevant representations stage, no tree survey can be found within the Arboricultural Impact Assessment and therefore all the Council can tell from the details submitted is what category the applicant believes the trees to be felled are. As such the Council is unable to make a full assessment of what impact the loss of these trees would have on the immediate area.

The development proposals are considered not compliant with the Bexley Local Plan (2023) from a townscape and visuals perspective.

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- The development, with particular reference to the absorber columns at circa 113 metres in height are likely to have significant, adverse effects on the landscape and the impact is not limited to direct views of the site as these would be the tallest structures in the area.
- Loss of landscape character experienced by users of Norman Road (e.g. walkers seeking to access the Thames Path to the north of the site) as a result of a reduction in visual links between the marshland and the river, and users of the public rights of way across the Crossness Nature Reserve and Crossness Nature Reserve itself, due to the large scale of the built form as seen from this location.

Neutral Impacts

A number of slight-moderate (not significant) impacts have been reported in the Environmental Statement during operation – these neutral impacts tend to be on mid-distance views (such as the Belvedere or Thamesmead residential areas or the road network) where the proposed development would be in keeping with the existing industrial elements of the view.

Water Environment and Flood Risk

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Local Plan Policy SP1 necessitates sustainable development. With regard specifically to the water environment and flood risk, the policy emphasises that the consideration of flood risk forms part of the sustainable development principles, with consideration

required as to how new development incorporates flood risk management and resilience to flooding measures.

Local Plan Policy SP8 requires that development proposals, where relevant, to consider natural flood management to enhance the local water environment. The policy requires development to protect the River Thames and their tributaries through natural flood management techniques, whilst also encouraging development to include measures to restore waterways and minimise flood risk by encouraging natural water flow.

Local Plan Policy DP18 sets out that waterfront development or development proximate to flood defences should be set away from watercourses appropriately to mitigate flood risk and to allow natural water flow. Proposals that include the construction or reinforcement of existing flood defences or river embankments should consider rising water levels to support long term resistance to flooding. It should be ensured that contaminants will not enter waterways during flooding events and ensure that development close to rivers does not jeopardise the structure or stability of riverbanks.

Local Plan Policy DP19 states that development proposals on riverside sites must consider realigning flood defences and support flood resilience along the River Thames through the enhancement of flood protection measures, whilst also aligning with the Thames Estuary 2100 Plan. Development should contribute to the Thames Path and maintain riverbanks to manage the local water environment. Developments should explore the implementation of natural flood defences to contribute to sustainable flood risk management, whilst allowing space for intermittent controlled flooding where appropriate.

Local Plan Policy SP9, whilst not specifically relating to flood risk or the water environment, does include some provision for improving the water environment insofar as it relates to indirect benefits through supporting ecological health and green infrastructure in developments.

Local Plan Policy SP13 emphasises that collaboration between applicants of development proposals and Thames Water to ensure developments consider management of flood risks, particularly in relation to wastewater generation. It is expected that consideration is made to the Thames River Basin Management Plan to promote improvement of water quality and the indirect support of flood resilience through catchment management. With regards to the nearby Crossness Sewage Treatment Works (CSTW), it is recognised that this key infrastructure must be safeguarded against flood risk to ensure continuous operation.

Local Plan Policy DP29 requires development proposals to ensure they do not negatively impact watercourses or groundwater, both in terms of quality and quantity.

Local Plan Policy SP14 sets out that green infrastructure in developments can contribute towards the management and reduction of flood risk, particularly in relation to surface water flooding. The policy encourages Integrated Water Management (IWM) to ensure solutions enhance the water environment whilst simultaneously reducing

flood risk. It is expected that new development be in low-risk areas, with use made of the flood risk sequential test to minimise exposure to flood risk. Key infrastructure projects and assets are expected to be protected from flood risk, including during extreme weather events and climate change-induced flooding events.

Local Plan Policy DP32 states that development proposals in relevant flood zones must be situated within designated industrial sites to ensure only certain areas are approved based on flood risk assessments. Developments must pass the exception test and consider flooding from all sources. Development proposals should include natural flood management techniques and green infrastructure to minimise the risk of flooding. A requirement for major development in flood zones includes Flood Risk Assessments and Drainage Impact Assessments.

Local Plan Policy DP33 requires that development proposals, regardless of change to permeable areas, must make use of sustainable urban drainage systems (SUDS) to manage flooding events and reduce flooding potential. It is expected that hardstanding is reduced to the minimum amount necessary, with hardstanding drained appropriately to reduce total runoff rates as much as possible. For sites over 0.25ha, drainage strategies and maintenance plans will be required to ensure long-term flood management is integrated into development proposals.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy D11 sets out that development proposals are required to maximise resilience to risks including flooding and extreme weather events, through incorporation of flood-resistant and resilient measures from early in the design process. It is further expected that development can handle flooding events associated with ongoing climate change.

London Plan Policy G5 covers the expectation that major developments include urban greening elements that contribute to improved and nature-based sustainable drainage, with the aim of such measures to reduce surface water runoff and mitigate flood risk through absorption and the slowdown of water flow. Natural landscapes in and around major development sites should be preserved where they aid in managing surface water runoff rates.

London Plan Policy SI 5 states that the protection and conservation of water resources will be emphasised when assessing development proposals. It is expected that developments will reduce water consumption where possible to ensure the preservation or improvement of London's water environment. Developments should aim to enhance the water environment by ensuring the prevention of contamination of water bodies and ensure careful water management, particularly in flood prone areas.

London Plan Policy SI 12 sets out the expectation that applicants submitting proposals for development are expected to work collaboratively with the Environment Agency and Lead Local Flood Authorities to ensure flood risks are mitigated and managed in a

sustainable way. Development proposals are expected to minimise flood risks and make space for water to naturally be managed during flooding events, where applicable. Development should be in accordance with the Thames Estuary 2100 Plan, particularly those developments that remain operational during flooding events or are considered to be critical infrastructure. It is expected that developments proximate to flood defences are developed in a way that will allow space for future maintenance and upgrades, with natural flood management encouraged and flood storage space provided on relevant open land.

London Plan Policy SI 13 provides that development proposals should aim to achieve greenfield runoff rates and manage surface water runoff close to its source, which will in turn limit flood risk by controlling water locally. The Policy sets out the preference for green infrastructure solutions to sustainably reduce runoff rates and improve the water environment. It is generally expected that impermeable surfaces are limited to only those areas that are essential, with drainage systems designed to improve the water environment whilst also enhancing flood resilience.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

The Applicant has not raised flood risk and water resources as a significant concern in the Environmental Statement. Given this the Council would refer the Inspector back to its comments in its Relevant Representation, but please note at that stage the Council had a number of questions and sought clarity on some assessments, to which the applicant has provided a response. The Council considers the responses provided to therefore have a neutral impact in relation to flooding which are as follows:

- The Applicant has confirmed that a full drainage strategy will be submitted for approval but it is unclear as to when this would be. It is assumed that this would be at requirement stage if a Development Consent Order was granted.
- The Applicant has updated the expected lifetime of the development and associated climate change allowance for the assessment.
- The Council also acknowledges the information around the access points for maintenance of the drainage ditches.
- The submitted information states that some of the drainage ditches on the site will be infilled to enable to the development and that they will be replaced by the drainage system. The applicant will need to demonstrate within the detailed drainage strategy that there will be no loss of storage and no increase in flood risk as a result of these changes.

Climate Resilience

Local Impacts

The proposal would result in the removal of 1.3 million tons of carbon from the atmosphere which would aid in improving climate resilience in line with the Governments Resilience Framework.

Greenhouse Gases

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Local Plan SP14 sets out that development will be expected to achieve net-zero standards, with commitments to reducing greenhouse gas emissions in line with net zero targets. Furthermore, the policy promotes decentralised energy network, in that they can reduce emissions by providing efficient local energy production. The implementation of green infrastructure can further support the sequestration and indirect lowering of energy demand in order to reduce emissions.

Local Plan DP31 provides that development proposals within heat network priority areas should be designed to connect to existing and proposed networks, which will in turn reduce greenhouse gas emissions and enable more efficient centralised heating. It is expected that major developments that generate heat explore what contribution to heat networks they can make, unless it is shown to be unfeasible.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy SI 2 requires that major development must be net-zero carbon, focusing on reducing greenhouse gas emissions and managing energy demand through implementation of the energy hierarchy – use less, supply cleanly, maximise renewable and monitor performance. Major developments should be submitted with energy strategies detailing how the net-zero will be achieved and ensuring accountability for emission reductions. It is stated that a minimum of 35% on site-emissions are reduced beyond Building Regulation requirements, with the whole-life cycle carbon assessed as part of development, including demolition.

London Plan Policy SI 3 encourages developers to work collaboratively with energy companies early in the development process, particularly to meet energy demand for large-scale developments. Effective energy supply options should be identified, and the infrastructure needs provided to ensure sustainable energy solutions. Major developments within heat network priority areas should incorporate communal heating systems and prioritise connection to zero-emission energy sources in order to lower greenhouse gas emissions.

London Plan Policy SI 8 sets out that, with regards to the management of London's waste and waste capacity, 100% of London's waste should be managed within the city by 2026. It is expected that through the prioritisation of waste reduction and materials management, a lowering of carbon emissions will be achieved. Renewable energy generation from waste is supported. New waste facilities will be expected to achieve a

positive carbon outcome, focusing on high-carbon materials reuse and a minimum performance for energy-from-waste to contribute to emissions reductions in line with net zero targets. Furthermore, the transportation and movement of waste should be carried out by zero-emission transportation methods.

The full policy description is included in Appendix 2 of this representation.

Local Impacts

The proposal would result in the removal of 1.3 million tons of carbon from the atmosphere which would aid in improving climate resilience in line with the Governments Resilience Framework.

Notwithstanding that

Positive Impacts

The following positive impacts have been identified:

- Removal of 1.3 million tonnes of Carbon Dioxide from the atmosphere.

Negative Impacts

No negative impacts have been identified.

Neutral Impacts

- The GHG assessment has not considered any future evolution of waste throughput and composition as an immediate consequence of the implementation of upcoming expected waste policies and legislation on landfill,
- Strategies to reduce carbon capture at source have not been addressed.
- Corrections to the actual removals (biogenic carbon) and carbon savings (fossil carbon) have not been applied.
- Changes in the profile of net electricity exports after installing the carbon capture plant have not been considered.

Socioeconomics

Policies

London Borough of Bexley Policies

Local Plan Policy SP3 sets out that Bexley's target for job creation is 10,800 over the plan period, with 1,900-2,700 within designated industrial locations, in order to contribute to employment growth and economic stability. A diverse mix of high-quality and knowledge-based jobs are encouraged. SMEs are to be encouraged through the optimisation of land use to foster job growth. There is a general protection of SILs with space to be dedicated to industrial activity, with an emphasis in the policy to improve

public transport connections to facilitate residents to reach good job opportunities, as well as local skill and training opportunities. Planning obligations will be utilised to encourage developers to source local labour, provide apprenticeships and other training opportunities.

Local Plan Policy SP10, although referring to the transportation network, is considered relevant to socioeconomics and job creation insofar that it supports major new infrastructure, including public transportation, cycling and walking infrastructure, to facilitate easier connection between residents and job opportunities. It is expected that all development contribute to the improvement of connectivity.

Relevant policies are taken from the Bexley Local Plan (2023)

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan Policy E11 states that development proposals are expected to actively support job creation, skills development, apprenticeships and training during both construction and operational phases, ensuring that local residents gain from new employment opportunities, including through planning obligations. There is an emphasis to encourage people to complete apprenticeships and ensure new development is accessible to London residents, particularly under-represented groups in construction. I

London Plan Policy SI 8 sets out that, in relation to waste management sites, it is expected that job creation as well as other social value benefits are considered, including skills, training and apprenticeship opportunities.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

As a large-scale infrastructure development project, the proposed development is likely to result in employment benefits during the construction phase. However, this is a short-term gain and in the long term there would be some repercussions as a result of this proposal as once operational.

Positive Impacts

Approximately 914.8 net additional jobs would be generated in the construction and development phase of the proposal, of which 686.1 would be within Greater London and 228.7 outside of Greater London.

Negative Impacts

- Should a DCO be granted based on current proposals some 50-54 highly skilled jobs at Munsters Joinery would be lost and replaced with circa 27 full time jobs which are not considered to be “skilled”. This would result in the net loss of circa 27 jobs.

- As identified in other key sections of this Report there may be transportation issues generated within the region, linking congestion and associated economic impacts caused.

Neutral Impacts

The documentation provided to date by the Applicant has excluded an assessment of potential impacts on tourist sectors, although this is considered a negligible impact category.

Ground Conditions and Soils

Policies

London Borough of Bexley Policies

Local Plan Policy DP18 sets out that, in relation adjacent to waterways, due environmental considerations should be taken into account with regards to mitigating pollution runoff and avoiding pollution to waterways or surrounding land and soils.

Both Local Plan Policies SP9 and DP20 state that, inter alia, soils are an important contributor to biodiversity and geodiversity. It should be ensured that developments protect or sustainably manage impacts on geodiversity. To ensure alignment with the goals of this policy, it should be ensured that if contaminated soils are present, remediation should be carried out.

Local Plan Policy DP28 states that a desktop study must be carried out to investigate land which is or may be contaminated prior to development. Such investigations should inform appropriate remediation that should be carried out prior to development commencing. Development proposals for potentially hazardous installations must seek consultation from the Health and Safety Executive (HSE).

Local Plan Policy DP29, whilst not directly addressing contaminated land and soils, is somewhat relevant due to potential impacts on the quality of groundwater. Development proposals must ensure that developments do not unduly impact soil through pollution that may in turn affect the quality of groundwater proximate to the development site.

Relevant policies are taken from the Bexley Local Plan (2023)

Policy DP28(1) of the Bexley Local Plan (2023) states that “Where development is proposed on contaminated land or potentially contaminated land, a desktop study and site investigation, including appropriate proposals for remediation will need to be carried out where required.”

Policy DP29 of the Bexley Local Plan (2023) states that any development within the vicinity of Crossness Sewage Treatments works be accompanied with a technical assessment to demonstrate that the proposal would not have any adverse impacts.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance – No relevant policies found in the London Plan.

Local Impacts

The development proposals are considered compliant with the Bexley Local Plan (2023) from a ground conditions and soils perspective subject to the imposition of requirement 21 of the draft DCO.

Positive Impacts

No positive impacts have been identified.

Negative Impacts

No negative impacts have been identified.

Neutral Impacts

Major and moderate negative effects are identified associated with ground gases and asbestos in soils during the construction and operational phases of the development, potentially affecting site users, construction workers and buildings. Proposed mitigation measures are stated by the Applicant to reduce these impacts to negligible.

Landside Transport

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023)

Local Plan Policy SP8 provides that, in relation to landside transport, that cycling and walking routes should connect to open spaces and key destinations, such as public transport in order to promote accessibility. It is expected that developments integrate with public transport and enhance connections with green spaces.

Local Plan Policy DP18 sets out that it is expected that waterfront development proposals are set back from water to ensure that walkways and cycle paths are retained or provided to ensure a broad active transport network and a pedestrian network.

Local Plan Policy DP19 states that there is a requirement for development to contribute to the completion or ensure the retention of the Thames Path, a continuous cycle and walking network along the River Thames. In addition, it is expected that access

points are safeguarded with development proposals enhancing connectivity between the Thames Path and broader transport network.

Local Plan Policy SP10 sets out that there is an expectation that development proposals support the development and implementation of key transportation developments where applicable. In addition, active transport should be implemented in development proposals with associated facilities implemented in relation to cycling. Development proposals shall also facilitate the use and accessibility to public transport networks, whilst also promoting the transition away from car use.

Local Plan Policy SP11 states that transport infrastructure shall be safeguarded from development proposals, including the delivery of strategic transportation infrastructure. Development should also ensure the continued operation of infrastructure relating to pedestrian movements, cycling and public transport. There is also an emphasis set out in this policy on the enhancement of sustainable transportation options, road safety and the reduction of barriers insufficient transportation infrastructure has on development.

Local Plan Policy DP22 provides that development proposals should focus on integrating and promoting sustainable and active modes of transportation. With regards to walking, development should encourage safe and convenient routes between key destinations and provide wayfinding to facilitate this. It is expected that development proposals provide sufficient cycle parking and links to London's cycling network whilst ensuring such infrastructure is safe and attractive to use. Where applicable, development proposals should provide for public transport, including access and routes to existing public transportation provision. Where developments would benefit, proposals should provide for shared mobility options and facilities, including EV charging points and car club providers.

Local Plan Policy DP24 further promotes and outlines that development proposals will be expected to provide sustainable travel options to reduce demand on car travel whilst promoting and increasing demand for walking, cycling and public transport use. Developments are expected to prioritise safety for vulnerable road users, including cyclists and pedestrians. Furthermore, development proposals must ensure the efficient and safe operation of the transport network and the function of roads or streets. Should development proposals cause unmitigated severe adverse impacts, whether alone or cumulatively, it is likely development proposals cannot be supported.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

NPPF (2023)

Paragraph 109 of the NPPF (2023) states that the planning system should actively manage patterns of growth in support of sustainable transport objectives. It states that significant development should be focused on locations which are or can be made

sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Paragraph 114 of the NPPF states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

London Plan (2021)

London Plan Policy D3, although relating to higher density development types, states that there is an expectation that development proposals generally promote active travel and facilitate operation of pedestrian and cycle routes. Development proposals should also ensure efficient servicing is provided for.

London Plan Policy E4 sets out that development on SIL sites should not jeopardise the operation or delivery of strategic transportation infrastructure, including in relation to freight. Development proposals on SIL sites should appropriately integrate relevant infrastructure to facilitate freight movements where relevant.

London Plan Policy SI 8, in relation to waste capacity and provision of related infrastructure, should seek to as far as reasonably practicable reduce the number of vehicle movements via roads, with opportunities sought to move freight via river and rail. Such opportunities are expected to facilitate the reduction in transport-based greenhouse gas emissions.

London Plan Policy T1 provides that development proposals are expected to facilitate the delivery of the mayor's strategy to target 80% of all trips made by foot, cycle or public transport by 2041. Developments are thus expected to make effective use of land to facilitate public transport use, walking and cycling.

London Plan Policy T2 sets out that development proposals are expected to facilitate active travel and the use of public transport, particularly for shorter trips. The Policy sets out the targets of the 'Healthy Streets' approach, which aims to reduce car dominance and increase walking, cycling and public transport through the provision of appropriate infrastructure. The design of all roads and streets should advocate for use for pedestrians, cyclists and public transportation providers and ensure connectivity between development by foot and cycles.

London Plan Policy T4 states that development proposals should integrate with both existing and proposed strategic transportation infrastructure, whilst prioritising sustainable travel and the safety of all users of transport. Development proposals should demonstrate how the Healthy Streets approach has been integrated into proposals, with adverse impacts on the transportation network mitigated against.

The full policy description is included in Appendix 2 to this representation.

Local Impacts

The development proposals set that at peak construction phase up to 1,000 workers would be on site per day of which 480 (48%) are forecast to use private vehicles to access and egress the site during peak hours. The majority of which would be outside of peak hours. In addition of up to 25 daily HGV deliveries (50 two way movements) would occur, with up to 3 deliveries in the peak AM period and up to 2 deliveries in the peak PM period.

During construction as a worst case scenario it is expected that overall there would be up to 970 daily traffic movements (889 in AM peak hour and 81 in PM peak hour).

Once operational the proposed development is anticipated to employ 27 full time members of staff of which 13 (48%) are forecast to use private vehicles to access and egress the site during peak hours. In addition of up to 10 HGV deliveries every three weeks (20 two way movements), 1 additional delivery (2 two way movements) every three months and 1 further HGV delivery (2 two way movements) every 6 months.

The peak hour capacity assessments undertaken for the operational period show that the local highway network is forecast to operate within capacity and there is no reason to suggest that the proposed scheme would have an adverse impact on the highways in terms of traffic generation. There will not be a significant increase in traffic generated by the development.

A mechanism to secure these assumptions would be considered necessary and could be included as a DCO requirement. A total of 970 two-way daily vehicle trips are forecast during the busiest construction period, the majority of which will be staff car trips.

The Council are concerned of an overspill into the surrounding highway from private workforce vehicles during construction. Parking stress on the surrounding highway should be monitored by the appointed construction travel plan coordinator and if an overspill of parking occurs as a result of workforce motorised vehicles, then measures to resolve the situation will need to be discussed and agreed with Bexley Council.

Once operational it is proposed that in terms of a staff travel plan the proposed scheme would be incorporated within an update to the existing workforce travel plan (WTP) for Riverside 1 (and Riverside 2 once operational). The successful implementation of this this would be in conformity with Local Plan Policies.

The submitted Transport Assessment sets out that during the construction phase, 2% of workers would arrive via bicycle it is anticipated that there would be 40 two

way movements (20 arrival and 20 departure). At operational stage it is anticipated that again, 2% of the workforce would arrive via bicycle and this is equal to 2 two way movements (1 arrival and 1 departure).

Beyond the anticipated numbers no further details have been provided and it would be expected by the Council that 20 long stay and 5 short stay cycle parking spaces would be required at construction stage and 2 long stay and 2 short stay cycle parking spaces operational phase. Whilst it is noted that the proposed scheme would be incorporated as an update to the existing WTP for Riverside 1 (and Riverside 2), details on the number of spaces needs to be provided in order to make sure that the correct provisions are provided in accordance with planning policy.

With regard to public rights of way (PRoW) the proposed development would see the applicant granted powers to alter (temporarily or permanently), divert, prohibit the use of or access to PRoW. Whilst the Council does not object to changes to the PRoW network in principle, it is considered that the Council should have more involvement in any parts of the development which affect the PRoW particularly with regard to any reprovisions of PRoW to protect residents access. It is considered that more mechanisms are needed in the DCO in order to make sure that the Council has more of an influence on PRoW issues, particularly with regard to S257 (permanent diversion of PRoW) of the Town and Country Planning Act 1990 and S25 (creation of new PRoW) of the Highways Act 1980.

Improvements to the highway along Norman Road form part of the works delivered by the development. The Council does not object to the changes in principle however, the DCO states it is not compulsory for the developer to enter into an appropriate agreement with the Highway Authority. This could create a possible maintenance and financial burden to the Council if temporary and permanent changes to the highway are not built to an agreed specification / design and appropriate standard. Therefore, it is considered that a mechanism is added to DCO require the developer to enter into an appropriate agreement (S278 of the Highways Act 1980) which offers a guarantee of temporary and permanent changes to highway are complete to an acceptable standard and thus reduce the risks to the Council.

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Impact of construction traffic on the local network.
- Localised impact on Norman Road on pedestrians, cyclists and public transport users travelling to and from these nearby developments.
- Poor management of deliveries may lead to backing up of traffic onto Norman Road.

Neutral Impacts

The following neutral impacts have been identified:

- Whilst it is welcome that footpaths would be retained, albeit re-routed, the Council would like to have more powers over how the process for re-routing footpaths would occur in order to make sure that the best possible routes for users are created / maintained.

Land Use and Consideration of Alternatives

Policies

London Borough of Bexley Policies

Relevant policies are taken from the Bexley Local Plan (2023):

Policy SP1 of the Bexley London Plan seeks to support sustainable development. The policy sets out how the Council will achieve sustainable growth in homes, Jobs, services and the environment and what it expects developments to do in order to meet these goals. Among other things new developments should strengthen the economy by 2a(ii) optimising the use of the borough's industrial land through intensification of sites; 2a(iii) increasing inward investment in new high technology and creative sectors supported by world-class digital infrastructure and 2a(v) improving access to jobs in Bexley, London and the wider south east through the development of local skills.

In terms of protecting and enhancing the natural and built environment developments should b(i) adapting to and mitigating the impacts of climate change, including flood risk and b(ii) focussing new development on urban, brownfield sites in accessible locations;

Policy SP8 of the Bexley Local Plan (2023) seeks to protect Metropolitan Green Belt and Metropolitan Open Land (MOL) from inappropriate development among other things.

Policy SP9 of the Bexley Local Plan (2023) seeks to protect and enhance biodiversity and geological assets. The policy sets out how the Council will protect and enhance the borough's biodiversity and geodiversity assets in line with national and regional policy. This includes at part 1(d) "(By) protecting, conserving, restoring, and enhancing ecological networks, Sites of Importance for Nature Conservation (SINC), Local Nature Reserves, Strategic Green Wildlife Corridors and local wildlife corridors, thus securing measurable net gains for biodiversity, recognising and promoting those sites where ecological value has increased to a higher grade of nature conservation importance." With part 1(f) stating that "(By) protecting and enhancing the natural environment, seeking biodiversity enhancements, net gains for biodiversity and improved access to nature, particularly in areas of deficiency as illustrated by Figure 8, through new development and projects that help deliver opportunities for green infrastructure with preference given to enhancements that help to deliver the targets for habitats and species set out in the London Plan and local biodiversity action plans and strategies"

Policy SP10 of the Bexley Local Plan (2023) states that the Council will work to achieve a comprehensive, high-quality, safe, integrated and sustainable transport system, which makes the most of existing and proposed transport infrastructure within the borough. The policy also states that the Council seeks to ensure a much improved and expanded role for sustainable transport and sets out the actions that will be implemented to achieve this.

Policy SP11 of the Bexley Local Plan (2023) states that Council will support development proposals that compliment and do not frustrate delivery, operation or retention of existing and future transport infrastructure. This applies to transport infrastructure used for walking, cycling, public transport services, traffic on the public highway and piers/safeguarded wharves.

Policy SP14 of the Bexley Local Plan (2023) states that the Council will actively pursue the delivery of sustainable development by: 1(a) supporting developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to net zero. 1(c) investigating opportunities for the funding and development of decentralised energy networks in the borough; and, supporting the provision of infrastructure, including safeguarding routes and land for such use, where necessary and 1(i) (work) with the Environment Agency and others to ensure the recommendations of the TE2100 Plan are implemented in new and existing developments, to keep communities safe from flooding in a changing climate and improving the local environment;

Policy DP7 of the Bexley Local Plan (2023) states that within SIL's the following Use Classes are considered appropriate:- B2, B8 and E(g)(ii) and E(g)(iii) where the permitted function cannot change to any other E use class.

Policy DP17 of the Bexley Local Plan (2023) seeks to maximise access to existing open space. The blocking or hindering of public access will not be acceptable unless alternative access is provided.

Policy DP18 of the Bexley Local Plan (2023) sets out that all development proposals adjacent to rivers and other watercourses will be required to be a criteria in order to be found acceptable and any development which adversely affect water ways or water courses, be it the integrity of them, or the quality of water for example, will not be supported.

Policy DP19 of the Bexley Local Plan (2023) sets out that developments within the Thames Policy Area must pay attention to their impacts on such things as flood defences, wharves and ecology.

Policy DP20 of the Bexley Local Plan (2023) sets out that a criterial which needs to be adhered to in relation to biodiversity and geodiversity in developments. This includes among other things demonstrating a strict approach to the mitigation hierarchy has been taken. Part 1 relates to all developments, part 2 relates to SINC.

Policy DP21 the Bexley Local Plan (2023) sets out that applicants are required to incorporate urban greening measures in the layout and design of schemes.

Policy DP31 of the Bexley Local Plan (2023) at point 2 sets out that “In designated heat network priority areas, proposals for the development of decentralised energy network infrastructure and related apparatus, including the use of low carbon technology, will be supported.” Part 3 of the policy sets out that “Proposals for major developments that produce heat and/or energy should consider how they can contribute to the supply heat in a designated heat network priority area or demonstrate that this is not technically feasible or economically viable.

Local Plan Policy SP1 emphasises the importance of sustainable development and the priority of using urban and brownfield sites in accessible locations. Development should seek to avoid greenfield or Green Belt sites unless it can be demonstrated clearly that no other alternative sites can be identified. It is expected that the exploration of alternative sites is undertaken to ensure development is directed towards the most appropriate and sustainable locations.

Local Plan Policy DP7 highlights that SIL sites are safeguarded for industrial uses, with an emphasis on the modernisation, intensification and maintaining of industrial floorspace. It is expected that such development does not impede nearby businesses or unduly conflicted with other land uses proximate to the development location or SIL site.

Local Plan Policy DP17 sets out the importance of preserving and enhancing access to publicly accessible open space on or near development sites. Development proposals should ensure such access is maintained with alternative layouts etc. encouraged to ensure such public open space remains accessible.

Local Plan Policy SP8 states that it is of key importance that green infrastructure, open space and biodiversity are protected from development. This includes Metropolitan Open Land (MOL), which must be protected from inappropriate development. Development proposals must ensure that land use patterns maintain ecological corridors and the restoration, connection and accessibility to green spaces. Furthermore, the policy emphasises that land use should maintain connectivity for cycling and walking.

Local Plan Policy DP18, in relation to development on waterfronts, must ensure that adequate space is retained along waterfronts with public access along the water maintained or provided where no access exists. Development proposals must ensure that water spaces are not lost, including riparian space, with the layout of development maintaining connectivity and permeability.

Local Plan Policy DP19, insofar as land use and alternative site selection is relevant, states that development proposals within the Thames Policy Area (TPA) must consider and investigate the potential for full or part realignment of flood defences if applicable. It also sets out that riverside development must consider impacts on priority habitats

within the Thames Policy Area (TPA), with improved access to nature encouraged across the TPA and provision of habitat promoted.

Local Plan Policy SP9 sets out that in reaching planning decisions, the council will seek to ensure that development proposals through siting or land use, do not adversely impact designated sites of nature conservation importance or Sites of Importance for Nature Conservation (SINCs). Development proposals should ensure that site layouts allow for appropriate landscaping to be implemented as part of the proposal.

Local Plan Policy DP20 states that development proposals must strictly follow the mitigation hierarchy (avoid, mitigate, compensate and net gain) in relation to impacts on biodiversity. Furthermore, development proposals that impact sites designated for its nature conservation will not be permitted unless criterion are met, including that there are no reasonable, less damaging, alternative solutions, location or sites identified. In addition, ecological buffer zones must be incorporate into the scheme to allow the continuity of wildlife habitats and corridors. Access to the designated site must not be compromised due to inappropriate patterns of development or land use.

Local Plan Policy DP21 sets out that development proposals will be expected to integrate landscapes of a high standard, with land use patterns within developments allowing for the integration of tree planting, unless the lack of is justified through compelling reasons. Developments that will impact sites of nature conservation importance must include appropriate ecological buffer zones as part of the land use and layout of development.

Local Plan Policy SP10 emphasises that development proposals must not unduly jeopardise future development of major public transport infrastructure, including but not limited to the potential for new Thames crossings. Development proposals, through appropriate land use patterns, must encourage permeability for pedestrians and cyclists.

Local Plan Policy SP11 provides further emphasis that the siting of development proposals should not frustrate the deliver of future transportation infrastructure, including the potential sites for Thames crossing points.

Local Plan Policy DP25 sets out that sites for new or extended waste management and related facilities are appropriate in SIL locations. However, the land use and surrounding sites must be considered insofar as how such businesses or operations will be impacted, including sites of nature conservation. A sequential test is expected to be followed and only locations where no significant adverse impacts are identified will be acceptable.

Local Plan Policy SP14, in relation to land use, sets out that development proposals will be supported where the provision of infrastructure, including safeguarding of routes and land for decentralised energy and heat networks is demonstrated.

Local Plan Policy DP31 states that development within heat network priority areas should be designed to ensure that connections to the network(s) are secured in accordance with the London Plan. Land use and layout of major heat-generating

developments should demonstrate through appropriate land use and layout can contribute to the creation of heat networks.

The full policy description is included in Appendix 1 to this representation.

Other Relevant Policy and Guidance

London Plan (2021)

Local Plan Policy SP1 emphasises the importance of sustainable development and the priority of using urban and brownfield sites in accessible locations. Development should seek to avoid greenfield or Green Belt sites unless it can be demonstrated clearly that no other alternative sites can be identified. It is expected that the exploration of alternative sites is undertaken to ensure development is directed towards the most appropriate and sustainable locations.

Local Plan Policy DP7 highlights that SIL sites are safeguarded for industrial uses, with an emphasis on the modernisation, intensification and maintaining of industrial floorspace. It is expected that such development does not impede nearby businesses or unduly conflicted with other land uses proximate to the development location or SIL site.

Local Plan Policy DP17 sets out the importance of preserving and enhancing access to publicly accessible open space on or near development sites. Development proposals should ensure such access is maintained with alternative layouts etc. encouraged to ensure such public open space remains accessible.

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Local Plan Policy DP19, insofar as land use and alternative site selection is relevant, states that development proposals within the Thames Policy Area (TPA) must consider and investigate the potential for full or part realignment of flood defences if applicable. It also sets out that riverside development must consider impacts on priority habitats within the Thames Policy Area (TPA), with improved access to nature encouraged across the TPA and provision of habitat promoted.

Local Plan Policy SP9 sets out that in reaching planning decisions, the council will seek to ensure that development proposals through siting or land use, do not adversely impact designated sites of nature conservation importance or Sites of Importance for Nature Conservation (SINCs). Development proposals should ensure that site layouts allow for appropriate landscaping to be implemented as part of the proposal.

Local Plan Policy DP20 states that development proposals must strictly follow the mitigation hierarchy (avoid, mitigate, compensate and net gain) in relation to impacts on biodiversity. Furthermore, development proposals that impact sites designated for its nature conservation will not be permitted unless criterion are met, including that there are no reasonable, less damaging, alternative solutions, location or sites identified. In addition, ecological buffer zones must be incorporate into the scheme to allow the continuity of wildlife habitats and corridors. Access to the designated site must not be compromised due to inappropriate patterns of development or land use.

Local Plan Policy DP21 sets out that development proposals will be expected to integrate landscapes of a high standard, with land use patterns within developments allowing for the integration of tree planting, unless the lack of is justified through compelling reasons. Developments that will impact sites of nature conservation importance must include appropriate ecological buffer zones as part of the land use and layout of development.

Local Plan Policy SP10 emphasises that development proposals must not unduly jeopardise future development of major public transport infrastructure, including but not limited to the potential for new Thames crossings. Development proposals, through appropriate land use patterns, must encourage permeability for pedestrians and cyclists.

Local Plan Policy SP11 provides further emphasis that the siting of development proposals should not frustrate the deliver of future transportation infrastructure, including the potential sites for Thames crossing points.

Local Plan Policy DP25 sets out that sites for new or extended waste management and related facilities are appropriate in SIL locations. However, the land use and surrounding sites must be considered insofar as how such businesses or operations will be impacted, including sites of nature conservation. A sequential test is expected to be followed and only locations where no significant adverse impacts are identified will be acceptable.

Local Plan Policy SP14, in relation to land use, sets out that development proposals will be supported where the provision of infrastructure, including safeguarding of routes and land for decentralised energy and heat networks is demonstrated.

Local Plan Policy DP31 states that development within heat network priority areas should be designed to ensure that connections to the network(s) are secured in accordance with the London Plan. Land use and layout of major heat-generating developments should demonstrate through appropriate land use and layout can contribute to the creation of heat networks.

London Plan Policy D3 emphasises the need for a design-led approach to ensure the optimisation of site capacity, whilst simultaneously respecting local context, infrastructure and environmental considerations. It is expected that development proposals demonstrate that the land use and layout is optimal to ensure the protection of other land uses.

London Plan Policy E4 sets out the importance of safeguarding and optimising industrial land to meet current and future operational needs, such as infrastructure. It is expected that development in such locations emphasises land use considerations such as intensification, co-location and substitution of industrial uses as relevant and appropriate, suggesting that site selection and alternatives are considered where applicable. SILs, in particular, are expected to encourage and promote efficient land use.

London Plan Policy E5 furthers those points set out in E4, including the supporting of SILs as hubs for land uses relating to industrial and related activities. The policy encourages the intensifying and efficiency of land, suggesting the consideration of alternative sites in SILs should certain industry and infrastructure be suitable intensification. Furthermore, the policy sets out that land use within SILs should not jeopardise surrounding uses, including sensitive development or ecologically sensitive sites.

London Plan Policy G1 sets out that the network of green and open spaces across London should be protected, enhanced and integrated to achieve maximum benefits through appropriate land use patterns. Development proposals must demonstrate how the layout and form of development appropriately integrates into London's wider green network.

London Plan Policy G4 states that development proposals should ensure that they do not result in the loss of protected open space and, where possible, through appropriate land uses and layouts, create areas of publicly accessible open space, particularly in areas of deficiency.

London Plan Policy G6 stipulates that SINC be protected from development. If it is considered that harm to a SINC is unavoidable, the benefits of the development proposal must clearly outweigh the impacts on such sites. Land use patterns and site selection should ensure that damage or impacts are minimised as far as reasonably practicable, with off-site compensation of better biodiversity value identified. On the flip side, development proposals that reduce deficiency in access to nature, through land use consideration and informed layouts, will be considered positively.

London Plan Policy SI 3 provides that, where there is potential for the implementation or co-location of heat network and other energy generation facilities, appropriate site selection and land uses are emphasised. Major development specifically in Heat Network Priority Areas should ensure a layout and design that allows for the cost-effective connection to a Network at a later date.

London Plan Policy SI 8, in relation to waste management and related infrastructure, sets out that the location of such development, must be appropriate in terms of location

and not result in undue impact upon the amenity of surrounding land uses. The site selection of such developments should be informed by, inter alia, social value benefits, local needs and accessibility of services.

London Plan Policy SI 9 states that existing sites in relation to waste management and related infrastructure, be located on sites where they are integrated with other uses as appropriate. Development proposals that result in the loss of existing sites for the processing of waste will not be permitted unless alternative provision of such sites is secured.

London Plan Policy SI 13 provides that, in terms of land use and layout of sites, adequate land and land use should be provided for within and surrounding developments for appropriate and sustainable drainage solutions, with runoff rates no more than greenfield rates and implemented in such a way to promote multiple benefits, including amenity and recreation.

London Plan Policy SI 16, with relation to development proposals close to waterways and concerning land use on or near waterways, should ensure that development proposals increase the provision of facilities such as moorings and required facilities related to waterways. Land use patterns and the layout of developments are expected to ensure access points to waterways and paths and protected and enhanced. Furthermore, proposals are expected to contribute to the extension and improvement of the Thames Path, ensuring sites are adequately permeable and retain access points to the Thames Path.

London Plan Policy T1 sets out that, in relation to transportation, development proposals make effective use of land and ensure connectivity and accessibility through appropriate land use for public transport, walking and cycling routes.

London Plan Policy T2 states that development proposals should deliver appropriate patterns of land use to facilitate residents of London making regular trips by walking and cycling. Development proposals are expected to demonstrate, including through land use and layout, that they will demonstrate alignment with the Ten Healthy Street Indicators and reduce the dominance of vehicles on London's streets, as well as be permeable for cyclists and those on foot.

London Plan Policy T5, through appropriate land use patterns and layouts, should ensure that proposals remove barriers to cycling and promote a healthy environment for people to choose to cycle. Development proposals should support the delivery of cycle routes and networks, with proposals providing for cycle parking to facilitate improved rates of cycling.

Local Impacts

At relevant representation stage the Council set out that land use and consideration of alternatives were an important issue in relation to this proposal and since then, very little additional information has been provided in order to demonstrate that a thorough consideration of alternative sites had been considered. With that in mind it is considered that the issues raised by the Council at relevant representation stage still remain and

those issues are considered to be the impacts that the development would have on the borough. For clarity the Council stated the following at relevant representation stage:

“Whilst the development may offer benefits to the wider environment through the capture of carbon emissions, any value must be weighed up against the direct negative environmental impacts that could cause harm to nature conservation and the local environment. This needs to be included in the detailed consideration of all site options given that the benefits versus harm outcome will vary for each option. The protection of biodiversity is an important objective of national policy and the Development Plan (Bexley Local Plan (2023) and London Plan (2021)) for the area and should be given appropriate weight in decision making.

The majority of the land use designations attributed to the chosen Carbon Capture site are provided with protection from development through National, Regional and Local Development Plans. The definitive adopted boundaries for all designations are shown on the Bexley Local Plan Policies Map. The following designations cover all or part(s) of this site: Functional Floodplain (EA Flood Zone 3b); Local Nature Reserve (a Natural England designation); Metropolitan Open Land (MOL), Metropolitan Site of Importance for Nature Conservation; Strategic Industrial Location and Thames Policy Area (London designations); Strategic Green Wildlife Corridor; and Southeast London Green Chain.

With regard to MOL this is given the same status and level of protection as the Green Belt. Consideration therefore needs to be given to the relevant guidance within the NPPF (2023). Chapter 13 of the NPPF discusses the acceptability of development within the Green Belt. It states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (Paragraphs 152-153). This is supported by Policy G2 of the London Plan (2021) as well as Policy SP8 of the Bexley Local Plan (2023).

NPPF Paragraphs 154-155 highlight the forms of development within the Green Belt which may be considered to be appropriate. In the context of this development, it is considered that the proposals would not qualify as one of the forms of development which are considered as not inappropriate in Paragraphs 154-155 of the NPPF (2023) and therefore the development by definition is an inappropriate form of development in the Green Belt.

Consideration therefore needs to be given to whether any Very Special Circumstances exist to warrant this application being acceptable. No Very Special Circumstances have been provided as part of this application and therefore, without justification, it can only be considered that the proposal represents inappropriate development in the Green Belt.

The chosen Carbon Capture facility location would result in the loss of part of the Erith Marshes Metropolitan Site of Importance for Nature Conservation (MSINC), and an amendment to the Crossness Nature Reserve boundary, resulting in the loss of part of the existing nature reserve, with an additional area added, that is also within the existing MSINC.

The Crossness Nature Reserve forms part of the larger Erith Marshes MSINC. The additional status assigned to the Local Nature Reserve, should not lessen the perceived value of the rest of the Erith Marshes MSINC, or its importance for nature and the vital role the area plays in conserving our natural heritage.

The Erith Marshes MSINC receives its metropolitan status because it is one of the most significant sites for nature conservation, not only within Bexley, but within London as a

whole. It is one of the best examples of London's habitats, being one of the very few remaining areas of Thames-side grazing marsh in London, supporting scarce birds, plants and insects.

The proposed Carbon Capture project is considered to not be an appropriate use for the land it is proposed to be located on. The proposed location of the development conflicts with a series of land use designations that protect land in this area for its value and ongoing contribution to nature conservation, openness, and flood resilience.

As the proposal is considered to not be policy compliant, a thorough consideration must be given as to whether the potential benefits of the project outweigh the harm to this area's environmental value, including a full consideration of reasonable alternate sites, with a particular focus on alternate sites that are not fettered by the above planning constraints.

Reasonable alternatives are discussed in the following documents:

- APP-052: 6.1 - Environmental Statement - Chapter 3 - Consideration of Alternatives
- APP-125: 7.5 - Terrestrial Site Alternatives Report
- APP-126: 7.6 - Jetty Site Alternatives Report

Economic Impacts are discussed in the following document:

- APP-064: 6.1 - Environmental Statement - Chapter 15 - Socio-economics

The proposed location would result in the acquisition of Munster Joinery and the loss of 50 to 54 jobs. The type of work attributed to this development is likely to be highly skilled and, with a high density of jobs to square metres of employment floor space, contributes to meeting Local Plan objectives for employment.

The Applicant's existing Riverside 1 (and 2 once fully constructed) are located on the western edge of the much larger Belvedere Industrial Area, a Strategic Industrial Location (SIL). Development of the Carbon Capture facility within the SIL would be policy compliant, and due to its proximity to the site would be reasonable to consider as an alternative site.

Only one reasonable alternative site option has been considered within the Belvedere Industrial Area, which is considered insufficient given the applicant's preferred location is considered to not be policy compliant. The one alternative site explored is shown on Figure 2-3 (Doc Ref. APP-125), the 'East' Development Zone, located within the SIL. This zone performed poorly against the Applicant's optioneering principles. However, the Council considers that with greater scrutiny of these issues and the Belvedere Industrial Area, many of these issues could be overcome, or are potentially of a lesser impact than those associated with the proposed location.

The East Zone comprises of the Iron Mountain Records Storage Facility, and Lidl Warehouse and Regional Distribution Centre. Iron Mountain currently employs approximately 55 staff, which, given the size and the type of use of this facility, offers low density employment. There is no mention of Iron Mountain in the Socio-economic chapter (Doc Ref. APP-064), therefore, it would appear conclusions have been reached without fully exploring this site as an opportunity.

The East Zone includes the Lidl Warehouse/Belvedere Regional Distribution Centre, a newly constructed development, which provides a significant number of jobs. However, no

consideration has been given to the ASDA Erith CDC / XDC, which given its location, being opposite the chosen Carbon Capture location and to the south of Iron Mountain, would seem reasonable to expect this to be fully considered as an alternative option

The North development zone shown on Figure 2-3 (Doc Ref. APP-125), comprising the intertidal zone of the River Thames, where the current Belvedere Power Station Jetty (disused) is located. This is also an alternative site for the proposed jetty, option A (Doc Ref. APP-126). The Port of London Authority has highlighted this location in its Thames Tidal Masterplan as an excellent opportunity for the decarbonisation project to bring the Middleton Jetty into use. It is therefore considered that more detailed considerations of this site, Iron Mountain, and ASDA needs to be undertaken.

The evidence submitted with the application does not appear to have followed up with the same amount of thought and analysis of reasonable alternatives, as it has given to the preferred location, which does not justify that these alternatives are not appropriate or would not enable the benefits to be realised without resulting in less harm than demonstrated.

Policies SP9 and DP20 of the Bexley Local Plan (2023) commits the Council to protecting, conserving, restoring, and enhancing ecological networks, Sites of Importance for Nature Conservation (SINC), Local Nature Reserves, Strategic Green Wildlife Corridors and Local Wildlife Corridors.

The London Plan Policy G6A states that Sites of Importance for Nature Conservation should be protected and this is further re-enforced at paragraphs 8.6.2 and 8.6.4.

The London Environment Strategy (LES) is also makes clear that Metropolitan Grade SINC's are of the highest priority of protection (LES Appendix 5 paragraph A.1.2.3-A.1.2.3.1). This is because these are sites which contain the "best examples of London's habitat sites which contain rare species, rare assemblages or important populations of species or sites which are of particular significance within otherwise heavily built-up areas of London." (LES Appendix 5 paragraph A.1.2.1)

Should the proposal be built out on the land subject to this application, the development would result in the loss and damage to a Metropolitan Grade SINC, something which exists in a very few other places in London.

Given the strong policy protections afforded to the land use designations on the chosen Carbon Capture area, significant planning weight is placed on protecting this land from development. Strong justification for the chosen area, with detailed consideration of alternatives should be an important part of this proposal.

Policy G6(c) of the London Plan (2023) states that where harm to a SINC is unavoidable, and where the benefits of the development proposed clearly outweigh the impacts on biodiversity, mitigation measures using the mitigation hierarchy (set out in the policy) should be applied.

Proposals for the chosen Carbon Capture area would result in harm to the wildlife value of land designated as Metropolitan SINC, therefore the Applicant needs to demonstrate that the 'harm' to the SINC is 'unavoidable' and also that 'the benefits of the development proposal clearly outweigh the impacts on biodiversity' before applying the London Plan mitigation hierarchy. Policy DP20 (2a) of the Bexley Local Plan (2023) considers whether there are 'any reasonable, less damaging, alternative solutions, locations or sites'.

Development that has the potential to harm the wildlife value of SINC may be considered unavoidable where all other reasonably available sites, of lower ecological value, and alternative solutions have been carefully considered and discounted with an appropriate level of justification. The applicant must also demonstrate that 'the benefits of the development proposal clearly outweigh the impacts on biodiversity'. Once this process has been undertaken, the mitigation hierarchy, and other biodiversity policy requirements should also be applied.

It is evident that each of the alternative development zones have a degree of value for wildlife and nature conservation, with site of importance for nature conservation land use designations within each. However, these designations have different levels of importance, and therefore a different priority for protection when comparing one against another. For example, the Belvedere Dykes SINC is a borough grade SINC, which means, whilst the site is of significance to wildlife at a borough level, it does not hold the same level of significance as the Erith Marshes SINC which is a Metropolitan SINC, which is of significance to the whole of London.

The detailed ecological impacts are discussed in the following document:

APP-056 6.1 - Environmental Statement - Chapter 7 - Terrestrial Biodiversity

APP-057 6.1 - Environmental Statement - Chapter 8 - Marine Biodiversity

These documents do not appear to consider alternative options, with the application relying on the reasonable alternative documents (APP-052, APP-125, and APP-126) which set out at a high level, what the ecological value of each development zone is.

When assessing if 'harm' to the Erith Marshes Metropolitan SINC is 'unavoidable', opportunities to bring forward alternative sites, and their comparative value and impacts should be given careful consideration. There appears to be limited attempt within the evidence submitted to weigh up the ecological impacts of alternative sites against one another, and the submission omits any detailed ecological assessment of the alternative options, which would have provided a clearer understanding of the value the alternative sites hold for nature.

Based on the evidence available, it is the Council's opinion that the chosen Carbon Capture site is likely to have the most significant ecological impact when compared to the alternatives. The development of the Iron Mountain and ASDA site would likely have the least ecological impact and would therefore be a preferable site, from an ecological perspective.

As discussed above, the evidence submitted with the application does not appear to have followed up with the same amount of thought and analysis of reasonable alternatives, as it has given to the preferred location, which is unacceptable given the importance of this site. It is the Council's view that a more detailed consideration of the Iron Mountain and ASDA site needs to be undertaken as a reasonable alternative.

When considering whether 'harm' to a SINC is 'unavoidable', and whether 'the benefits of the development proposal clearly outweigh the impacts on biodiversity', National biodiversity targets (priorities for protection and reducing biodiversity loss) and Carbon Capture are also two conflicting priorities which need to be explored, with sufficient information provided to allow the decision maker to carefully weigh up the conflicting priorities, before making an informed judgement.

Paragraphs 3.2-3.2.4 “ Do Nothing Scenario” of the submitted Consideration of Alternatives document set out that ‘the ‘Do Nothing’ scenario would be contrary to the UK’s commitment to achieve net zero carbon emissions by 2050. Consequently, it is not considered further.’

The consideration of alternatives makes no reference to the chosen carbon capture area, in terms of building on land protected for nature being contrary to the UK’s biodiversity commitments, such as those to halt and reverse biodiversity loss, and protect 30% land for nature by 2030, and by 2042 restoring or creating 500,000ha of wildlife rich habitats and 75% of protected sites to favourable condition, securing their wildlife value for the long term. Further evidence would be needed to enable a more balanced assessment.

APP-026:5.1 Consultation Report Appendices - Volume 1 - PIER Part 1 outlines the options for flue gas ducting routing. Four options A, B, C and D are presented. The report identifies Option B as the chosen ducting option. Despite the fact that two on-site options have been presented, the chosen option (Option B) is the only presented option that both has a section of ducting that lies outside the site and has a section of overhead ducting that falls within the Crossness LNR. In view of London Plan Policies G1 and G6 and Local Plan Policies SP8, SP9 and DP20 in so far as they relate to the protection of green infrastructure and biodiversity, potential harm to the ecology of the surrounding area should be a key consideration of all of the optioneering processes. There is a concern that the option appraisals do not include an assessment of the options in terms of their potential ecological impacts.

Additionally, detailed assessment of the potential conflicts between buried on-site infrastructure and maintenance operations cited as the reasons for not choosing the on-site options (A and C) have not been presented as part of the justification for not pursuing these options further. It is therefore not possible to judge whether the on-site constraints render options A and C impossible as opposed to impractical. This is a particularly important point as this design decision has the potential to limit any further encroachment into the ecologically sensitive Crossness LNR. Therefore, it is considered that the submissions do not demonstrate that full consideration of all of the potential impacts affecting the flue gas ducting options have been carried out in line with relevant London Plan and Local Plan Policies.”

Notwithstanding the above, for clarity the Applicant has provided some response to relevant representations which the Council will comment on forthwith along with some of the issues raised at the Issue Specific Hearing (ISH) (held on 6th November 2024) and the Compulsory Acquisition Hearing (CAH) (held 7th November 2024) which it feels are relevant to this issue;

Additional alternative options in the Belvedere Industrial Area Strategic Industrial Location (SIL) have been included in Applicant’s Relevant Representation response and discussed further at the Issue Specific Hearing 1 (ISH1) on alternatives. However, the Councils Relevant Representation comments on the approach to alternatives have not been fully or satisfactorily addressed.

Alternative sites have been discounted on a number of general high-level assumptions made by the applicant. These assumptions are not supported by background evidence or detailed impact assessments. Further work needs to be done by the applicant to justify their preferred site over the alternatives.

Iron Mountain is a document storage facility operating from an aging building, with a low floor space to jobs ratio. In principle, this general industry B8 use does not need to be located on a site adjacent to the River Thames and could easily be relocated to any purpose built B8 unit in the borough, such as the recently approved planning consent on Thames Road. The applicant should enter into discussions with Iron Mountain to understand their business needs and operational parameters. Likewise, discussions with other businesses in the Eastern Zone and other alternative options.

In principle, without sufficient and detailed evidence to suggest otherwise, it is the Council's opinion that other sites are likely to be more suitable sites to locate the Carbon Capture Project, which would result in significantly less ecological and economic impacts compared to the current proposal and could be compliant with Local and Regional policy. Furthermore, detailed justification and evidence would be required to demonstrate the current option is the only achievable option.

The applicant should provide a design solution that shows how their scheme could be accommodated on the Iron Mountain and other sites, and potential solutions to any technically challenging issues. At the hearing session, the applicant agreed to provide clarification on the area of land needed to accommodate the development in response to points raised by Munster Joinery. It would be a useful exercise for the applicant to rationalise what is required on the site, and what could be accommodated nearby.

Can the applicant confirm if the development could be accommodated fully within the Iron Mountain site? If a larger land area is needed, additional configurations including the Iron Mountain site should be explored. It is not clear why the applicant has only considered two alternative scenarios for the Iron Mountain site, being East and North 1.

Furthermore, it is noted by the Council that at CAH it was raised that the Iron Mountain site had been for sale recently (the Council is unsure when), and it was clear that the applicant was not aware of this. It is the view of the Council that a thorough assessment of the costing of compulsory purchasing any buildings within the East and North 1 areas should be provided in order to make a full assessment as to why the development could not be provided wholly within the SIL.

At the ISH, the applicant discussed the visual impact of the ductwork and vehicular movement across Footpath 4 as a reason for discounting Iron Mountain. These are not showstoppers, and it is considered unreasonable to dismiss Iron Mountain on the grounds that the ducting would make the footpath uninviting and that the footpath may have to be lost due to vehicular movements. In regard to these matters the Council would point out that both the exiting jetty of Cory and the unused jetty (albeit broken) of Iron Mountain both project over the Thames Pathway and in this context the notion of ductwork over the footpath would not be out of character with the immediate area.

With regard to the closure of the footpath for vehicular access, this could be possible for temporary periods of time (permits would be required) and the Council would potentially not be adverse to this. But it also should be noted that at the far, southern end of Norman Road, the road splinters into two with one part headed to the Cory

campus and the other part headed to the Iron Mountain building and Asda facilities. In this context, *that road* could be used to gain access to the Iron Mountain site thereby allowing footpath 4 to remain.

As discussed during ISP, the applicant did not consider Veridion Park Strategic Industrial Location as a reasonable alternative to consider due to the technical challenges of placing ductwork. The Council would like to see further detail and consideration of the technical issues that prevents this site coming forward as an alternative. The routing of the ductwork would likely follow the route of the proposed District Heating Network along Yarnton Way, alternatively along Eastern Way. The Inspector should be made aware that Peabody are seeking to sell Veridion Park and given this a thorough assessment of the costing of compulsory purchasing Veridion Park should be made.

The development proposals are considered not compliant with the Bexley Local Plan (2023) from a Land Use and Consideration of Alternatives perspective.

Positive Impacts

No positive impacts have been identified.

Negative Impacts

The following negative impacts have been identified:

- Inappropriate development on Metropolitan Open Land (MOL).
- Loss of part of Erith Marshes Metropolitan SINC, which includes part of the Crossness Nature Reserve.
- Lack of scrutiny of alternative sites.
- Application of mitigation hierarchy has not been applied.

Neutral Impacts

No neutral impacts have been identified.

Conclusion

Any DCO that is granted should take into account these representations.

Appendix 1- Policies in Bexley Local Plan (2023)

Set out below are the relevant Policies as set out in the adopted Bexley Local Plan (2023). Several policies are relevant to more than one topic that has been identified as relevant local impacts within the Local Impact Report (LIR). In this Appendix, each relevant Policy will be set out, with those topics it relates to set out beneath.

It is also of note that, whilst the entirety of the Policy wording may not be relevant to the topic(s) set out within the LIR, it is considered that at least part of the scope or an element of the Policy is relevant. As required, the full wording of the Policies are set out below. The Policies are set out below in the order they appear in the adopted Bexley Local Plan.

Bexley Local Plan Policy SP1 – Achieving sustainable development – the spatial strategy

The Council, through its policies and decisions, will aim to:

- a. positively pursue sustainable development in the borough by providing locally specific requirements in line with the NPPF and the London Plan; and
- b. work towards achieving sustainable growth in homes, jobs and services to create a network of healthy, well-connected, high-quality, desirable places where people want to live, play, learn and work in line with the vision and objectives of the Council's key strategies and this Local Plan, thus implementing the principles of sustainable development.

All new proposals for development must conform with the following principles of securing sustainable development in Bexley, where appropriate:

- a. Strengthen and diversify the local economy by:
 - i. reinforcing the network of vibrant and successful town centres;
 - ii. optimising the use of the borough's industrial land through intensification of sites;
 - iii. increasing inward investment in new high technology and creative sectors supported by world-class digital infrastructure;
 - iv. promoting circular economy principles and business models; and
 - v. improving access to jobs in Bexley, London and the wider south east through the development of local skills.
- b. Protect and enhance the natural and built environment by:
 - i. adapting to and mitigating the impacts of climate change, including flood risk;
 - ii. focussing new development on urban, brownfield sites in accessible locations; and,

- iii. optimising the efficient management of waste and existing natural resources.
- c. Create high-quality, safe and well-connected healthy lifetime communities by:
 - i. offering a choice of accessible living styles that appeal across generations; and
 - ii. providing necessary infrastructure, local services, open spaces, and cultural and educational facilities.

The main focus for the housing, industrial and commercial growth identified for Bexley, at varying densities and including most of its supporting infrastructure, services and facilities, will be:

- a. the Sustainable Development Locations identified on the Policies Map and illustrated by the Key Diagram (Figure 1), which are:
 - i. areas within 800 metres walking distance of, and including, Bexley's Major and District Town Centres and 400 metres from Local Town Centres;
 - ii. areas in the borough within 800 metres of railway stations that have a corresponding town centre nearby and 400 metres where the station has no adjacent town centre; and,
 - iii. areas with public transport access levels (PTALs) of 3-6;
- b. designated industrial locations (specifically for industrial growth and intensification); and
- c. the Thamesmead and Abbey Wood London Plan Opportunity Area.

Development proposals outside of these areas will be supported where they fully demonstrate compliance with all relevant Development Plan policies.

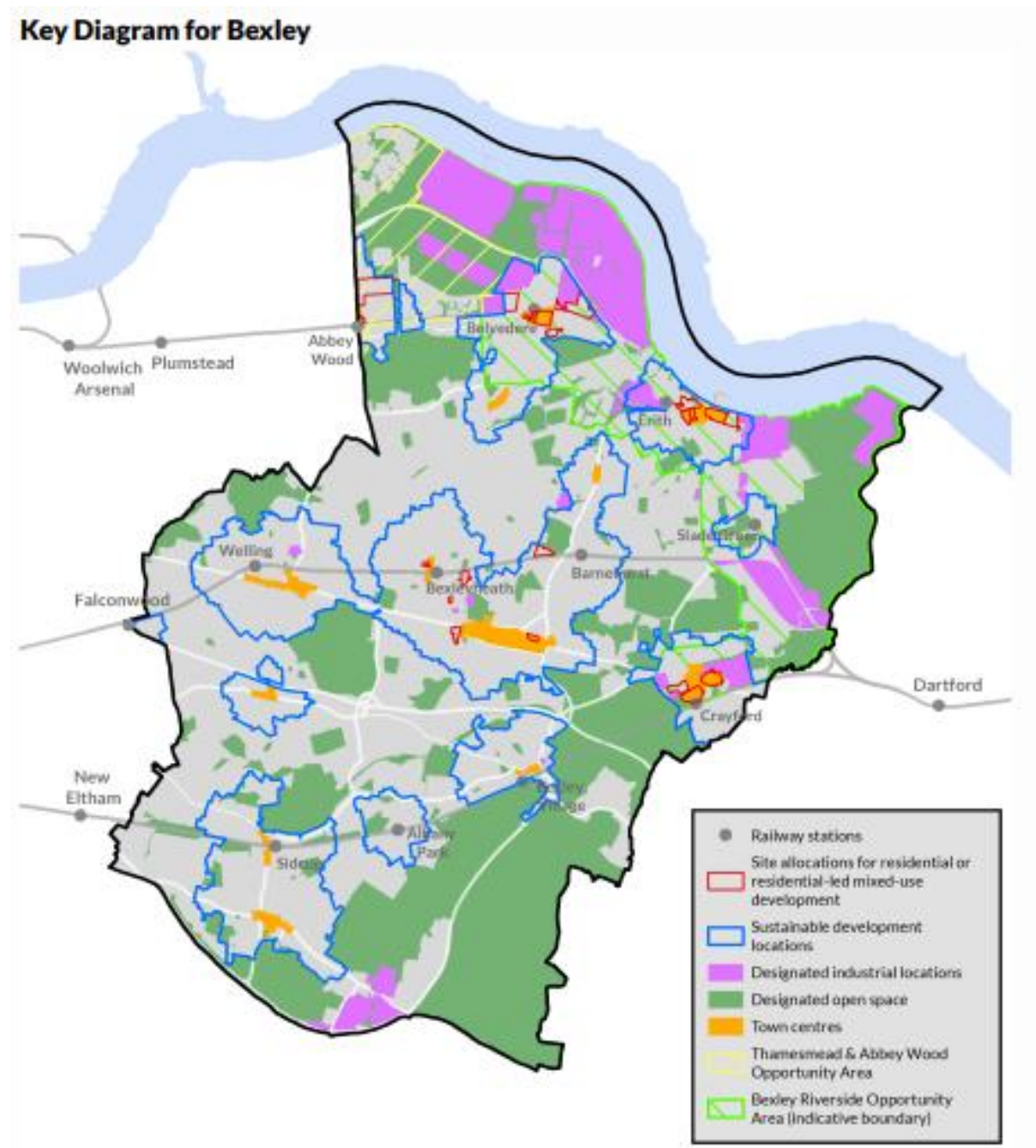


Figure x – Bexley Local Plan 2023 (London Borough of Bexley)

Local Plan Policy SP1 is relevant to LIR Topic(s):

- Climate Resilience
- Achieving Sustainable Development
- Land Use Consideration and Alternatives
- Water Environment and Flood Risk

Bexley Local Plan Policy SP3 – Employment growth, innovation and enterprise

Bexley will continue to play a key role in contributing to London's economic growth and prosperity. The Council will support the economic growth of at least 10,800 (net) new jobs over the plan period, of which approximately 1,900 to 2,700 of these will be located within Bexley's designated industrial locations. The Council will assist in developing a strong and sustainable local economy by embedding circular economy principles, so as to contribute to the resilience of London and the regeneration of the Thames Gateway. The Council will work with partners to secure investment that supports the local economy

The Council will promote sustained economic development and employment growth by supporting development proposals that broaden the mix of business uses and diversify the local employment offer, particularly in bringing higher quality and more knowledge-based jobs to the borough, both within town centres such as Bexleyheath, and designated industrial locations, and through the designation of Sidcup as a Creative Enterprise Zone. Proposals for economic development should, where possible:

- a. intensify land-uses to optimise the use of land, particularly on those sites identified in Table 5 in order to provide the additional 147,200m² to 195,400m² of industrial floor space needed for the new jobs identified in part 1 of this policy;
- b. increase employment densities;
- c. provide higher employment densities in well-connected locations;
- d. enable businesses to share facilities and equipment where practical, for example goods lifts, loading bays and ancillary facilities;
- e. make smaller units available as part of larger developments to support small and medium businesses;
- f. improve the quality of employment areas and town centres, including the public realm, to make them more suitable and attractive locations for modern businesses; and,
- g. apply circular economy design principles for building approaches.

Designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) will be protected for industrial type activities and related functions, including ancillary facilities, specific to their designation in the hierarchy, as set out in Policy DP7 Appropriate uses within designated industrial areas. These designations are defined on the Policies Map.

The Council aims to ensure that residents of all abilities are provided with opportunities to access training and a variety of local jobs and enable local businesses to draw upon a wide range of skilled workers and employment premises. Key to this will be a better integrated and enhanced public transport network connecting Bexley's housing and employment locations. The Council will achieve these aims by:

- a. reducing residents' need to travel long distances by supporting the creation of a diverse local economy that offers a wide range of well-connected local job opportunities, particularly in Bexley's designated industrial locations, town

- centres, neighbourhood centres and other places of employment including education and healthcare;
- b. improving the local skills base, especially by ensuring that education and training facilities, are available to residents, and by supporting the development of place and making initiatives in the borough;
 - c. encouraging businesses and developers, through planning obligations, to use locally sourced labour and where viable, to provide apprenticeships and on-the-job training for residents seeking to improve their skills;
 - d. supporting the provision of workplace crèches at or near places of training and employment; and,
 - e. facilitating growth of the visitor economy and creative industries to support local business, particularly by promoting the borough's historic, cultural, recreational and environmental assets.

Local Plan Policy SP3 is relevant to LIR Topic(s):

- Socioeconomics

Local Plan Policy DP7 – Appropriate use within designated industrial areas

Two types of industrial land are designated in the borough:

- a. Strategic Industrial Locations (SIL); and
- b. Locally Significant Industrial Sites (LSIS).

In designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), as identified on the Policies Map, the following use classes for industrial type activities and related functions, including ancillary facilities, will be permitted and safeguarded:

- a. Class B2 and B8
- b. Class E(g)(ii) and E(g)(iii), where the permitted function cannot change to any other E use class

Proposals for sui generis industrial uses will usually be permitted in designated industrial areas, provided that the use does not impede the effective operation of other nearby businesses. Sui generis uses that can have a detrimental effect on amenity, such as waste facilities or disposal installations, are not considered an appropriate use within LSIS, which is often located adjacent to residential areas.

In designated industrial locations, development proposals should where possible seek to intensify, renew and modernise business uses, including the assembly of land to achieve this.

Development proposals should not result in a net loss of existing industrial floor space for Class E(g)(ii), E(g)(iii), B2 and B8 uses in all designated industrial locations. Co-location with non-industrial uses will be considered on LSIS provided the principle of no net loss of existing industrial floor space is achieved.

Non-designated industrial sites should be assessed in line with criteria set out in London Plan policies, particularly E4 and E7

The SIL at Crossness Sewage Treatment Works is safeguarded for its strategic utilities infrastructure use and its operational land identified on the Policies Map.

In the Foots Cray Business Area, development proposals for existing E(g)(i) offices will only be permitted to change use to other suitable business uses (where not covered by permitted development rights).

Extensions, alterations, intensification or any other form of development for existing non-industrial uses on designated industrial land will not be supported.

The Council will support the temporary occupation of empty buildings and cleared sites by temporary uses for a period that should not normally exceed three years, where they contribute to regeneration; enhance the character and vitality of the area; and, where they do not harm the operation of the remainder of the estate.

Bexley's designated industrial land

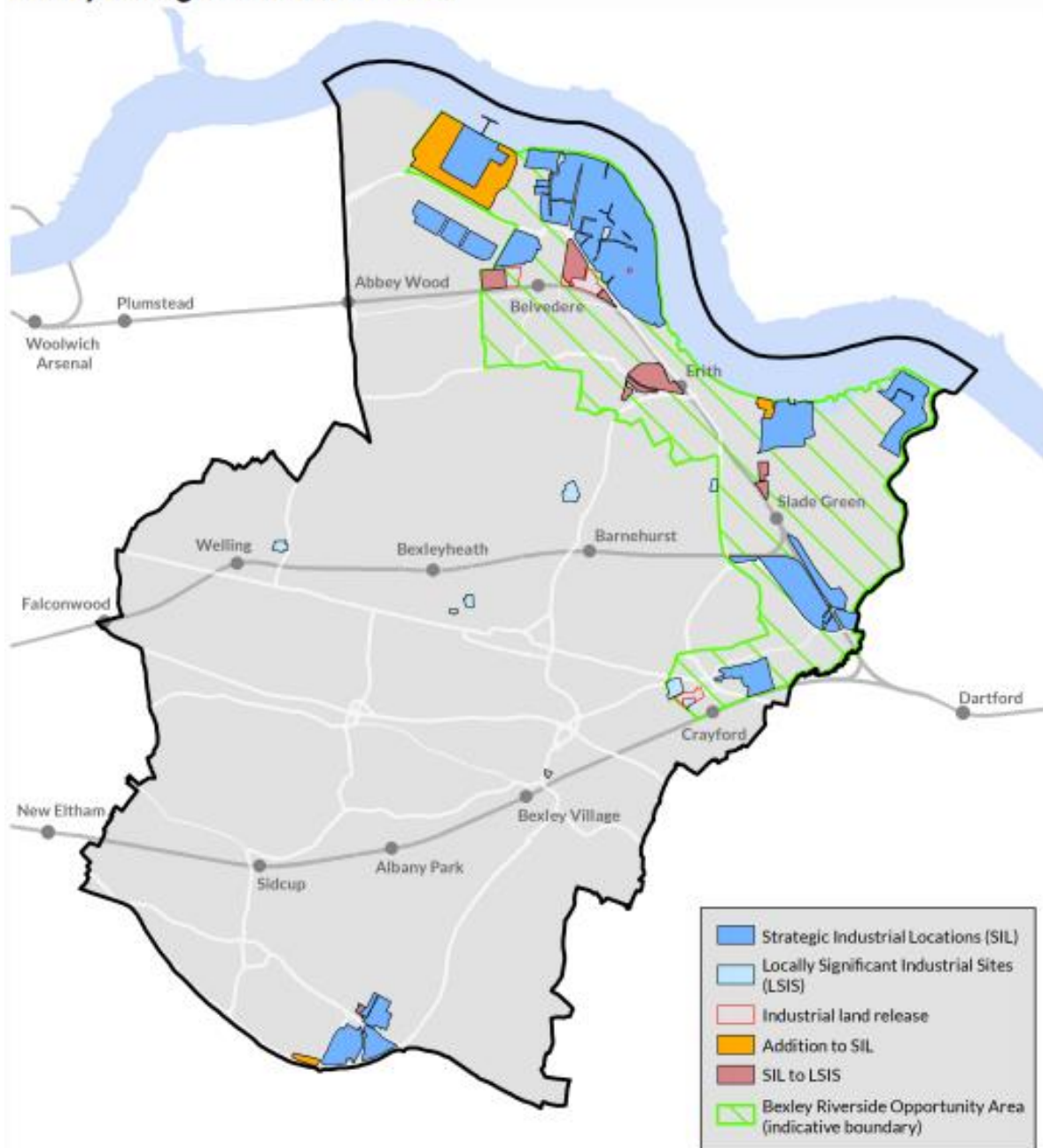


Figure x – Bexley Local Plan 2023 (London Borough of Bexley)

Local Plan Policy DP7 is relevant to LIR topic(s):

- Land Use and Consideration of Alternatives

Local Plan Policy SP5 – Placemaking through good design

The Council will continue to expect high quality standards of design in Bexley. Design should respect the existing character and context but need not be constrained by what already exists; local character evolves over time. The Council will seek to ensure that:

- a. all development within the borough is of high-quality design, contributes positively to the local environment, and protects the best elements of Bexley's character;
- b. design enhances social cohesion and health and wellbeing and considers the principles of inclusive and active design, in order to support good physical and mental health; and
- c. design considers the relationships between building and spaces, including its contribution to and shaping of the public realm.

The Council will masterplan future development, where appropriate, to ensure it achieves the objectives of sustainable development and proposals for developments in these areas will need to demonstrate that they will fit satisfactorily into the masterplan.

In locations suitable for large developments, proposals that are piecemeal in nature will normally be resisted unless the proposal demonstrates that it will fit satisfactorily into a larger development.

Local Plan Policy SP5 is relevant to LIR topic(s):

- Townscape and Visual (inc. Arboriculture)

Local Plan Policy DP11 – Achieving high-quality design

Development proposals within a Primarily Residential Area, as defined on the Policies Map, must seek to protect or enhance the area's character and its amenities. Proposals for uses other than those residential in nature, will only be acceptable where they provide community, social or leisure facilities, or employment uses compatible with a residential area.

Irrespective of location, all development proposals for new buildings, extensions and alterations, conversions, changes of use and public and private spaces will be expected to follow the principles and requirements set out in this document and to:

- a. ensure that the layout, height, scale and massing, façade treatment, and materials are complimentary to the surrounding area contribute positively to the street scene
- b. provide a high standard of landscaping design, appropriate to the proposal and with regard to the character of the surrounding area
- c. ensure that appropriate levels of privacy, outlook, natural daylight and other forms of amenity are provided
- d. ensure existing properties' amenity is appropriately protected
- e. ensure that all proposed development and uses do not unacceptably affect residents or occupiers of either the proposed development or of existing neighbouring residents, businesses and community facilities by means of noise, odour, vibration and light spill or other disturbances
- f. provide sufficient useable on-site external amenity space (communal, semi-private and private) and appropriate play spaces for children, relative to the proposed scale of development

- g. meet appropriate internal accommodation standards
- h. apply the principles of designing out crime whilst maintaining an attractive, connected environment
- i. ensure that new advertisements do not detract from the character and appearance of the surrounding area and do not have an adverse effect on public safety

Local Plan Policy DP11 is relevant to LIR topic(s):

- Noise and Vibration
- Townscape and Visual (inc. Arboriculture)

Local Plan Policy DP13 – Protecting local views

Development proposals with the potential to impact a Local Protected View must meet the following criteria:

- a. Development in the foreground and middle ground of a protected view should not be overly intrusive, unsightly or prominent to the detriment of the view;
- b. Development in the background of a protected view should give context to landmarks and not harm the composition of the view as a whole; and,
- c. Any existing or proposed viewing places within the development should be accessible and managed so that they enhance people's experience of the protected view

Development proposals that will have a significant adverse impact on the aesthetic and character of a Local Protected View will be resisted.

Development proposals should consider whether the proposal has the potential to impact on a non-designated view. Non-designated views should be identified through the Development Management process. A proposal with the potential to impact on a non-designated view must demonstrate that the proposal will not have an adverse impact on that view.

Development proposals that are within London's Protected Vistas must meet the requirements of Part F of London Plan policy HC4.

Local Plan Policy DP13 is relevant to LIR topic(s):

- Historic Environment
- Townscape and Visual (inc. Arboriculture)

Local Plan Policy SP6 – Managing Bexley's heritage assets

The Council will manage Bexley's heritage and archaeological assets, whilst seeking opportunities to make the most of these assets; including adapting to and mitigating the effects of climate change. This will enhance the local sense of place and support the

revitalisation and development of the borough, including promoting the visitor economy. This will be achieved by:

- a. promoting the borough's heritage assets, such as Lesnes Abbey, Danson Mansion, Hall Place and Gardens, Crossness Beam Engine House and Red House;
- b. reviewing the status of existing and identifying new heritage and archaeological assets;
- c. applying the NPPF and London Plan requirements for development proposals affecting heritage assets to conserve and enhance the significance of heritage assets, their settings, and the wider historic environment, and the requirements to protect assets from development that is likely to adversely impact on the significance, integrity, character or appearance of those assets or their settings;
- d. protecting the internal features of Council owned non-designated heritage assets where they contribute to the asset's significance; and,
- e. supporting historic restoration schemes through partnership working and seeking funding to enhance and use heritage and archaeological assets in an appropriate and sympathetic manner.

Local Plan Policy SP6 is relevant to LIR topic(s):

- Historic Environment

Local Plan Policy DP14 – Development affecting a heritage asset

Development proposals with the potential to directly or indirectly impact on a heritage asset or its setting should meet NPPF requirements to describe the significance of the asset and demonstrate how the proposal conserves or enhances the significance of the asset.

Development proposals on sites with existing heritage assets, particularly listed or locally listed buildings, should incorporate those assets. Outline applications will not generally be acceptable for developments that include heritage assets.

Any development proposal to alter or change the use of a heritage asset will need to conserve or enhance that asset; proposals must demonstrate how the change will support the building's preservation and future maintenance. Development proposals should restore, re-use and incorporate heritage assets, wherever possible. Proposals must demonstrate that the new use would not adversely affect the fabric of the building.

There is a general presumption against any proposal for development that demolishes a heritage asset in part or whole, including locally listed buildings.

Proposals to demolish buildings within Conservation Areas will be considered with regards to the NPPF approach to determining harm and will generally be refused unless it can be demonstrated that the development proposal would enhance the special character of the area; demolition will not be approved until consent for the replacement building is agreed.

Any proposed alteration must have regard for conserving or enhancing the special character of the building, both internally and externally. Replacement materials should be like for like or, where this is not possible or not preferable, should be compatible with the existing character of the building, either by sympathetically matching or contrasting.

Any proposed alteration to a non-designated heritage asset, including locally listed buildings, structures and landscapes, must have special regard to the asset's contribution to the streetscape.

Any proposed alteration to a non-designated heritage asset, including locally listed buildings, structures and landscapes, should conserve the particular characteristics that justify its identification.

Proposals for development within Conservation Areas must have due regard to the area appraisal and management plan in terms of design, use, and any other element identified as relevant.

Development proposals should be assessing the archaeological potential of sites and then retaining, in situ, archaeological evidence within sites, wherever possible. Where archaeological evidence cannot be retained, the appropriate levels of archaeological investigation and recording should be undertaken prior to the redevelopment of the site.

Local Plan Policy DP14 is relevant to LIR topic(s):

- Historic Environment

Local Plan Policy DP17 – Publicly accessible open space

In order to maximise access to existing publicly accessible open space, new developments will be required to:

- a. provide new or improved access to adjacent or nearby publicly accessible open space, where appropriate;
- b. not block or hinder existing public access, unless suitable alternative access is provided; and
- c. promote publicly accessible open spaces as multi-functional spaces that cater for a range of activities, lifestyles, ages and needs.

New open space provided as part of a development or existing open space that a new development can provide new or enhanced access to, should be inclusive and highly accessible to residents of the development and surrounding areas.

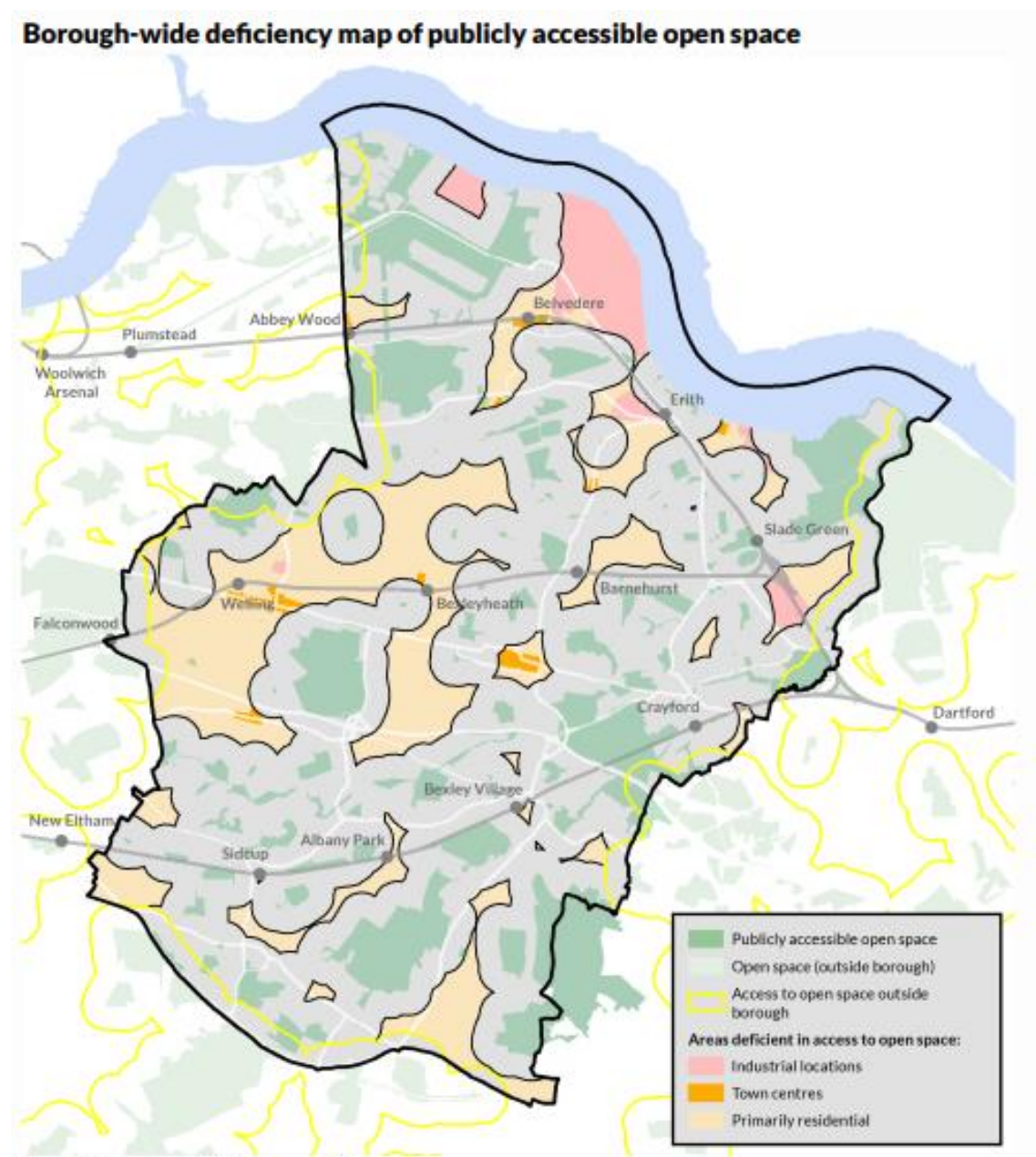


Figure x – Bexley Local Plan (London Borough of Bexley)

Local Plan Policy DP17 is relevant to LIR topic(s):

- Land Use and Consideration of Alternatives

Local Plan Policy SP8 – Green Infrastructure including designated Green Belt*

**Whilst referencing Green Belt, the policy does not preclude development outside of the Green Belt. The policy also clarifies that Metropolitan Open Land should be interpreted and considered in the same way that Green Belt land.*

Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced, restored and promoted as valuable resources to provide a healthy integrated

network for the benefit of nature, people and the economy. Future development must support the delivery of a high-quality, well-connected and sustainable network of open spaces. In particular, this will be achieved by:

- a. protecting Metropolitan Green Belt and Metropolitan Open Land from inappropriate development;
- b. encouraging beneficial use of Metropolitan Green Belt such as opportunities for public access, outdoor sports and recreation, retaining and enhancing landscapes, visual amenity, biodiversity or to improve damaged and derelict land;
- c. protecting Urban Open Space, only allowing development where the public benefit of the development clearly outweighs any harm;
- d. resisting harmful development of gardens and other amenity green spaces;
- e. keeping under review existing Allotments and encouraging provision of space for community gardening, including for food growing, within new developments;
- f. working in partnership, seeking funding and supporting projects to promote the restoration and enhancement of open spaces, public realm and the waterway network within the borough;
- g. agreeing proposals for creating or improving habitat, implementing priorities for the recovery of nature outlined in the relevant local nature recovery strategies, borough strategies or studies on open space, green and blue infrastructure, including where appropriate, rivers and waterways restoration;
- h. supporting the role waterways can play as tools in place making and place shaping, contributing to the creation of sustainable communities;
- i. protecting land that forms part of the Southeast London Green Chain as an important environmental, recreational and educational resource, including the Green Chain Walk, seeking to improve public access to and through the area, and promoting it as a recreational resource and visual amenity;
- j. supporting the creation of new cycling and walking routes to connect publicly accessible open spaces to main destination points, such as Town Centres, public transport hubs, community facilities, and other publicly accessible open spaces;
- k. ensuring all new developments deliver a net increase to green infrastructure;
- l. seeking opportunities in new development, where appropriate, to provide new open space, play space and/or public realm, either through direct provision of new open space or improvement of existing open space through planning obligations;
- m. protecting new, or existing, amenity space that has been provided as part of a development, including incidental green spaces that add amenity value;
- n. protecting and enhancing the biodiversity, heritage and archaeological values of open spaces, including the Thames, Cray and Shuttle rivers and their tributaries within the borough;
- o. using water spaces for transport, cultural, recreational and leisure activities and other water related uses where appropriate;
- p. providing opportunities within waterside development for river and waterway restoration and the protection and enhancement of biodiversity;
- q. protecting green wildlife and ecological corridors, seeking opportunities to increase connectivity between the network of green spaces and habitats to enhance biodiversity and promote accessibility wherever appropriate; and,

- r. seeking opportunities to support the functions and drivers for green infrastructure, such as using good urban design to reduce air pollution, integrating green infrastructure into development where there are opportunities to mitigate poor air quality on a local scale

Local Plan Policy SP8 is relevant to LIR topic(s):

- Air Quality
- Terrestrial Biodiversity
- Marine Biodiversity
- Townscape and Visual Amenity (inc. Arboriculture)
- Water Environment and Flood Risk
- Landside Transport
- Land Use and Consideration of Alternatives

Local Plan Policy DP18 – Waterfront development and development including, or close to, flood defences

All development proposals adjacent to rivers and other watercourses such as lakes, ditches and dikes will be required, where appropriate, to:

- a. activate space to and along the waterfront;
- b. maintain existing public access to and along the water and/or provide new access to and along the water where none exists;
- c. create residential moorings and visitor moorings to accommodate suitable vessels;
- d. enhance the appearance and quality of the water space including:
 - i) de-culverting watercourses and naturalising the river channel;
 - ii) using green infrastructure to improve water quality where possible;
 - iii) improving nature conservation value for wildlife;
 - iv) improving visual connections with important features, considering the design and landscaping of the adjacent area; and
 - v) preserving the openness and character of the water spaces.
- e. provide suitable setbacks from water space edges to mitigate flood risks, protect and enhance biodiversity, and to allow waterside walkways and cycle paths;
- f. improve river walls and embankments, taking into account sea level rise, and/or fluvial, ground water and surface water flood risks;
- g. promote safety along the water's edge, including the provision of riparian lifesaving equipment; and,
- h. avoid the loss of water spaces.

Development proposals should not adversely affect:

- a. the integrity of the waterway or watercourse structure;
- b. the quality of the water;
- c. levels of pollution due to unauthorised discharges and run off or encroachment;

- d. the landscape, heritage, ecological quality or habitat continuity and character of the waterways;
- e. the waterway's potential for being fully unlocked; or
- f. the use of the waterway network.

Local Plan Policy DP18 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Historic Environment
- Water Environment and Flood Risk
- Landside Transport
- Land Use and Consideration of Alternatives

Local Plan Policy DP19 – The River Thames and the Thames Policy Area

The Thames Policy Area is defined on the Policies Map

Development proposals for riverside sites should investigate the potential for full or part realigned flood defences prior to commencement of site planning, and are required to:

- a. follow the strategies for water management set out in the TE2100 Plan and subsequent updates;
- b. enhance the relationship between the development site and the Thames; and,
- c. contribute to the completion of the Thames Path, a continuous public riverside footpath and cycleway, including safeguarding existing or providing new access points to the riverside path.

The Council encourages improving the efficiency and promoting the sustainability of waterborne freight movements, including waste transfer and aggregates handling, on the Thames. Viable wharves are safeguarded for such uses through a Direction by the Secretary of State.

Proposals in the Thames Policy Area should pay attention to their impacts on the ecology of the River Thames, and on its priority habitats and protected species. Ecological enhancements will be sought from all proposals; development directly adjacent to the River should look to enhance essential fish habitats and reduce the risk of invasive species

The Council will encourage improved access to nature across the Thames Policy Area. Opportunities should be sought to link proposed and existing wildlife corridors, including the Ridgeway Link, Thames Marshes corridor, Thamesmead Link and the River Thames itself, and integrating these networks with pedestrian and cycle paths where appropriate.

Habitat creation and enhancement will be promoted. Opportunities should also be sought for related enhancements to visitor's centres and other facilities. Habitat

creation along the Thames should aim to improve the area's flood resilience and water management.

Local Plan Policy DP19 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Water Environment and Flood Risk
- Landside Transport
- Land Use and Consideration of Alternatives

Local Plan Policy SP9 – Protecting and enhancing biodiversity and geological assets

In its planning decisions, planning policies and action plans, the Council will protect and enhance the borough's biodiversity and geodiversity assets, in line with national and regional policy, by:

- a. ensuring development in Bexley does not adversely affect the integrity of any designated European site of nature conservation importance;
- b. recognising the value of landforms, landscapes, geological processes and soils as contributors to the geodiversity of the borough by protecting designated Sites of Special Scientific Interest (SSSI), and Regionally Important Geological sites (RIGs) and Locally Important Geological sites (LIGs) and supporting their sustainable conservation and management;
- c. establishing clear goals for the management of identified geological sites, in order to promote public access, appreciation and interpretation of geodiversity;
- d. protecting, conserving, restoring, and enhancing ecological networks, Sites of Importance for Nature Conservation (SINC), Local Nature Reserves, Strategic Green Wildlife Corridors and local wildlife corridors, thus securing measurable net gains for biodiversity, recognising and promoting those sites where ecological value has increased to a higher grade of nature conservation importance;
- e. resisting development that will have a significant adverse impact on the population or conservation status of protected or priority species as identified by legislation or in biodiversity action plans prepared at national, regional or local level;
- f. protecting and enhancing the natural environment, seeking biodiversity enhancements, net gains for biodiversity and improved access to nature, particularly in areas of deficiency as illustrated by Figure 8, through new development and projects that help deliver opportunities for green infrastructure with preference given to enhancements that help to deliver the targets for habitats and species set out in the London Plan and local biodiversity action plans and strategies;
- g. enabling environmental education opportunities at the borough's schools, and investigating opportunities to involve the wider community in biodiversity or geodiversity restoration and enhancement through projects;
- h. ensuring landscaping schemes in development proposals use native plant species of local provenance; and,

- i. seeking opportunities to provide for greening of the built environment.

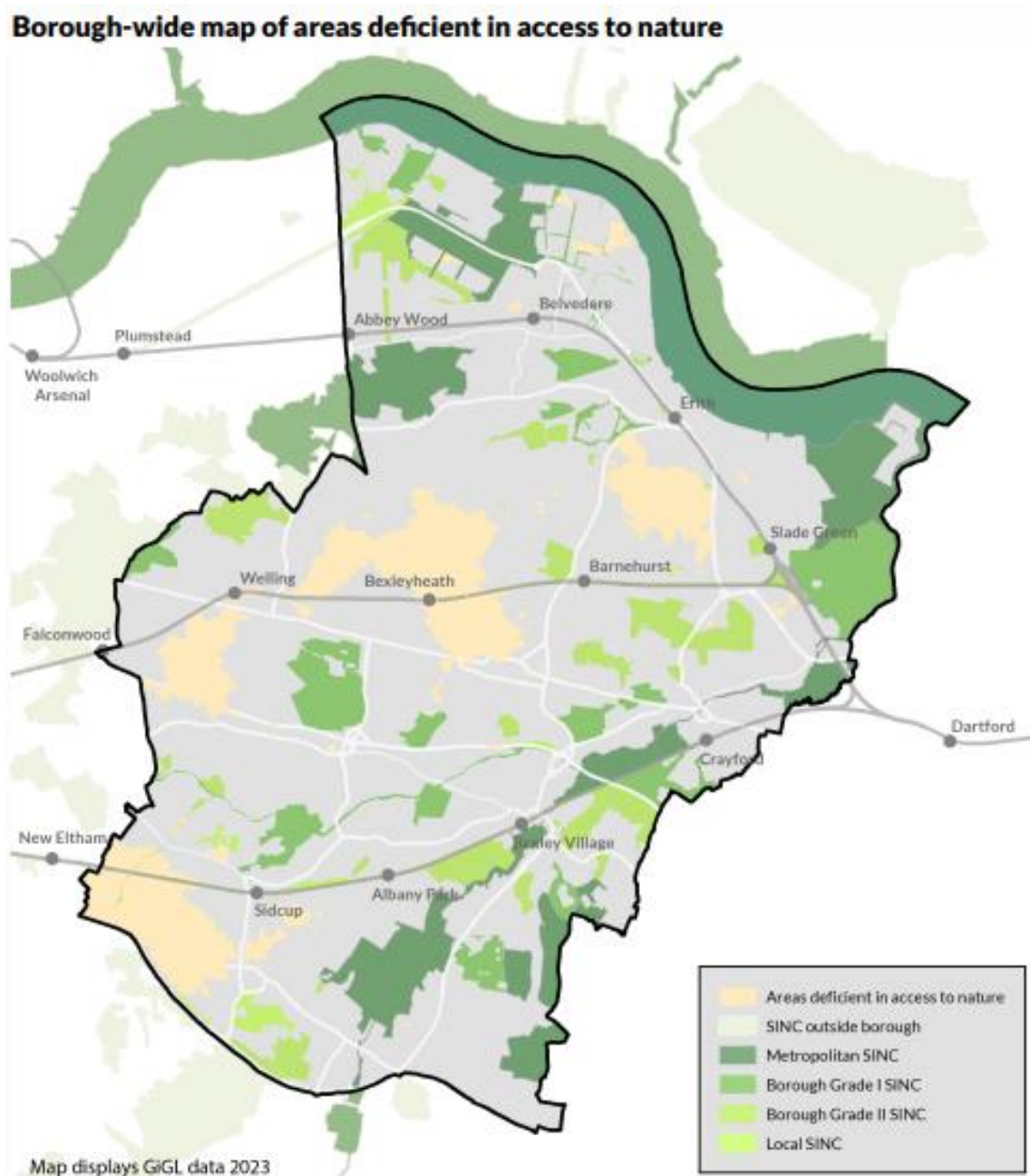


Figure x – Bexley Local Plan (London Borough of Bexley)

Local Plan Policy SP9 is relevant to LIR topic(s)

- Terrestrial Biodiversity
- Marine Biodiversity
- Water Environment and Flood Risk
- Land Use and Consideration of Alternatives

Local Plan Policy DP20 – Biodiversity and geodiversity in developments

Development proposals will only be permitted where it can be demonstrated that:

- a. a strict approach to the mitigation hierarchy has been taken (i.e. avoid, mitigate, compensate and net gain) and all unavoidable impacts on biodiversity can be justified;
- b. completion of the development will result in a measurable long-term net gain for biodiversity, as demonstrated through the application of an acceptable method of measurement, and/or impact assessments;
- c. biodiversity enhancement measures and where appropriate mitigation measures have been incorporated within the design, layout and materials used in the built structure and landscaping;
- d. opportunities to help connect and improve the wider ecological networks, wildlife corridors and stepping stones for wildlife have been taken by creating linkages through the development site;
- e. deficiencies in access to nature conservation are reduced, where possible; and,
- f. opportunities to increase wildlife aesthetic value and visual connections with important features have been considered.

Development proposals that would have a direct or indirect impact on a site designated for its nature conservation or geological interest should protect and enhance the designated site's value, and will not be permitted unless all of the following criteria are met:

- a. there are no reasonable, less damaging, alternative solutions, locations or sites;
- b. ecological buffer zones have been incorporated into the scheme, where appropriate, to protect and enhance the designated site's intrinsic value;
- c. the continuity of wildlife habitat within wildlife corridors is maintained; and,
- d. access to the designated site is not compromised and where possible, access and/or interpretation is improved

Irreplaceable habitats, including Ancient Woodland and aged or veteran trees found outside of Ancient Woodland will be protected from loss or deterioration resulting from development. Where development proposals may affect irreplaceable habitats and their immediate surroundings, the following principles of good practice shall be used to guide the site assessment and design of development:

- a. establishment of the likelihood and type of any impacts;
- b. implementation of appropriate and adequate mitigation, compensation, and management measures that respect the features and characteristics of the veteran trees and/or Ancient Woodland;
- c. provision of adequate buffers; and
- d. provision of adequate evidence to support development proposals.

Local Plan Policy DP20 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Land Use and Consideration of Alternatives

Local Plan Policy DP21 – Greening of development sites

Development proposals should set out what measures have been taken to achieve urban greening onsite; and all new major developments should quantify what urban greening factor (UGF) score has been achieved.

Development proposals will be required to provide a high standard of landscape design, having regard to the well-being, water, wildlife and character of the surrounding area, ensuring sustainable planting for the long term and be supported by appropriate management and maintenance measures

There will be a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on site; and planning permission will not normally be permitted where the proposal adversely affects important trees, woodlands, or hedgerows.

Development proposals should maximise potential for the planting of new native trees and hedges within the development site and new streets should be tree-lined, unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.

Planting and landscaping within developments and ecological buffer zones:

- a. will be required to contribute to habitats and features of landscape and nature conservation importance; and,
- b. must not include ‘potentially invasive, non-native species’ and, where found on a site, appropriate measures to remove these species must be taken as part of the redevelopment.

Local Plan Policy DP21 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Townscape and Visual (inc. Arboriculture)
- Land Use and Consideration of Alternatives

Local Plan Policy SP10 – Bexley’s transport network

The Council will work to achieve a comprehensive, high-quality, safe, integrated and sustainable transport system, which makes the most of existing and proposed transport infrastructure within the borough. The map of Bexley’s transport network, including locations of key transport project proposals, are set out in Figure 10. The Council seeks to ensure a much improved and expanded role for sustainable transport through the following actions:

- a. initiating or supporting the future development of major new public transport infrastructure proposals within or affecting Bexley, including an extension of Docklands Light Rail to Belvedere, Bus Transit from North Greenwich to Slade

Green, River Thames passenger services, including the upgrading of Erith Pier, and potential new Thames crossings – the Council will explore, by continued negotiations with Transport for London and the Port of London Authority a firm basis for the further progression of these schemes;

- b. increasing the capacity, frequency, accessibility and safety of established bus and rail facilities;
- c. supporting the improvement of interchange facilities through area-based schemes and other initiatives;
- d. encouraging walking and cycling within the borough through implementation of local and strategic walking and cycling programmes, travel plans, local safety schemes, the provision of facilities within development proposals, and environmental improvement projects;
- e. using local targets included in the Council's Local Implementation Plan to ensure Healthy Streets concepts and the Mayor's Transport Strategy's mode share targets are reflected in development proposals;
- f. working with the Crossrail to Ebbsfleet (C2E) partnership to secure the potential extension of the Elizabeth Line, including the protection of the land required for the scheme in accordance with existing and future Safeguarding Directions, and the managing of development to preserve and enhance the deliverability of the scheme;
- g. promoting improvements in north-south transport provision, including facilitating junction improvements, clearer signing, and enhanced bus services and facilities – in particular, improved connections will be sought with Abbey Wood station and the Elizabeth line;
- h. improving the efficiency and promoting the sustainability of freight movement in the borough and ensuring construction and operation of any new rail freight facilities, or wharves for waterborne freight handling, where this does not unduly prejudice other objectives of the Local Plan;
- i. developing other targeted road schemes, where they assist regeneration and reduce barriers to growth, whilst encouraging sustainable travel options, improving road safety and supporting modal shift away from the car;
- j. effectively maintaining and efficiently managing the existing highway network to reduce congestion and unnecessary delays, improve the environment, in particular air quality, and promote safety, health and wellbeing;
- k. encouraging a new transitional approach to providing and managing residential car parking within new developments in areas where parking demands and provision could both reduce over time as more sustainable means of connectivity are improved; and
- l. ensuring that the proposed change of use or redevelopment of existing railway station or town centre car parks retains or re-provides an appropriate level of public parking where such provision is:
 - i) essential to avoid unacceptable harm resulting from rail heading and/or to safeguard the continued viability and vitality of the relevant town centre.
 - ii) the minimum amount necessary; and
 - iii) informed by an appropriate transport assessment.

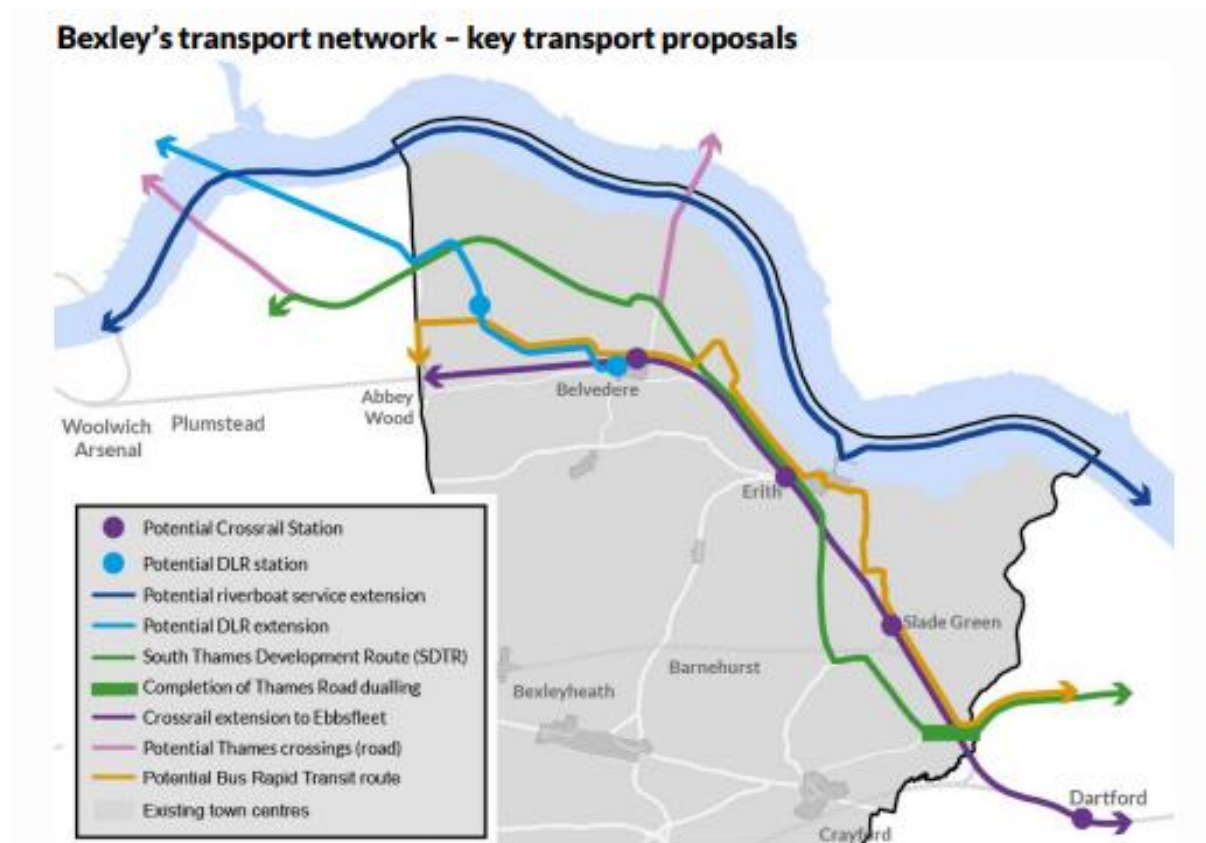


Figure x – Bexley Local Plan (London Borough of Bexley)*

*Of note is the siting of the 'Potential Thames Crossings (road)'.
 *Of note is the siting of the 'Potential Thames Crossings (road)'.

Local Plan Policy SP10 is relevant to LIR topic(s):

- Air Quality
- Socioeconomics
- Landside Transport
- Land Use and Consideration of Alternatives

Local Plan Policy SP11 – Safeguarding land for transport schemes

The Council will support development proposals that complement and do not frustrate delivery, operation or retention of existing and future transport infrastructure.

Unless existing transport infrastructure is agreed as surplus to requirements by the relevant strategic authority, operator or owner, development proposals should not prejudice its continued role, operation or effective, beneficial use. Where this is unavoidable, development proposals should include feasible means of replacing the affected transport infrastructure with alternatives of at least the same quality, funded through developer contributions. This applies to transport infrastructure used for:

- a. walking;
- b. cycling;

- c. public transport services;
- d. traffic on the public highway; and
- e. piers/safeguarded wharves (and access to them) to enable movement of people and goods on the River Thames.

Development proposals should support the plans to secure investment in, deliver and operate the following key transport infrastructure:

- a. an extension of the Docklands Light Rail to Belvedere via Thamesmead;
- b. Bus Transit route corridor priority measures and related interventions;
- c. targeted interventions on the South Thames Development Route (A206/A2016) to deliver benefits for regeneration and remove barriers to growth as well as improve sustainable transport and road safety where appropriate;
- d. a crossing of the River Thames between Belvedere and Rainham (likely to be beyond the Plan period);
- e. an upgrading of Erith Pier to accommodate riverbus services; and
- f. a cycling/walking crossing of the River Darent north of the A206 Bob Dunn Way.

Development proposals will not be accepted that prejudice the successful planning and delivery of these schemes, illustrated on Figure 10.

Land is safeguarded for the following strategic transport infrastructure schemes:

- a. an eastern extension of Crossrail services from Abbey Wood towards Ebbsfleet (C2E), in accordance with the relevant Safeguarding Direction(s) by the Secretary of State for Transport; and,
- b. completion of A206 Thames Road dualling between Bob Dunn Way and Crayford Way, including widening Cray Mill Bridge and enlarging the Thames Road/Crayford Way roundabout, as illustrated on the Policies Map, to deliver benefits for regeneration and remove barriers to growth as well as improve sustainable transport and road safety where appropriate.

Local Plan Policy SP11 is relevant to LIR topic(s):

- Landside Transport
- Land Use Considerations and Alternatives

Local Plan Policy DP22 – Sustainable transport

The Council will expect to see measures in all development proposals that facilitate and promote walking, cycling, public transport and shared mobility. In particular, development proposals should incorporate where appropriate the below points at an early design or pre-application stage:

Walking:

- a. identify and implement accessible, safe and convenient direct walking routes to Town Centres, transport nodes and other key destinations;

- b. promote and improve pedestrian wayfinding;
- c. provide for the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity;
- d. encourage a higher quality pedestrian and street environment for all users through the promotion of healthy streets and integrated communities;
- e. ensure residential streets encourage children to play out;

Cycling:

- f. provide secure, integrated, convenient and accessible cycle parking facilities in line with the standards set out in the London Plan, as a minimum;
- g. provide on-site changing facilities, including lockers and showers for cyclists, where appropriate;
- h. contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable;
- i. provide links to existing and planned cycle infrastructure projects including the Council's strategic quietways and cycleways network;

Public transport network:

- j. allocate road space and provide high level of priority on existing or proposed routes;
- k. ensure good access to public transport networks;
- l. ensure that all parts of the network can be used safely, easily and with dignity by all;
- m. ensure direct, safe, accessible and pleasant walking routes to stops;
- n. ensure standing, garaging and drivers' facilities are provided where needed;
- o. improve interchange between different modes of transport;

Shared mobility (smarter travel):

- p. provide electric vehicle charging infrastructure in line with London Plan minimum standards, to be made publicly available where possible;
- q. provide spaces for car clubs/pool cars, to be made publicly available where possible; and
- r. ensure compatibility with recognised providers of both services.

Local Plan Policy DP22 is relevant to LIR topic(s):

- Landside Transport

Local Plan Policy DP24 – Impact of development on the transport network

Proposals that reduce the need to travel and improve access to sustainable modes of transport will be supported.

Proposals should not have a significant negative effect on the safety of any users, including vulnerable users of the transport network such as pedestrians and cyclists. Proposals should identify, minimise, and mitigate potential negative impacts and seek to achieve a net positive effect on safety wherever practicable.

Proposals should not have a significant cumulative negative impact on the operation or efficiency of the local road network, Transport for London Road Network or National Highways Strategic Road Network, the public transport system or local amenity. Proposals should identify, minimise and mitigate potential negative impacts.

Development proposals should not result in:

- a. unsuitable use of any road that is prejudicial to its function in the Road Hierarchy, as set out in Table 11 and identified on the Policies Map, or a street according to its position in the movement and place matrix of street types, as set out in the Local Implementation Plan, illustrated by Figure 13, and taking into account the function of adjacent streets; or
- b. severe cumulative adverse impacts on the operation of roads or streets in the area

Movement and place matrix of street types

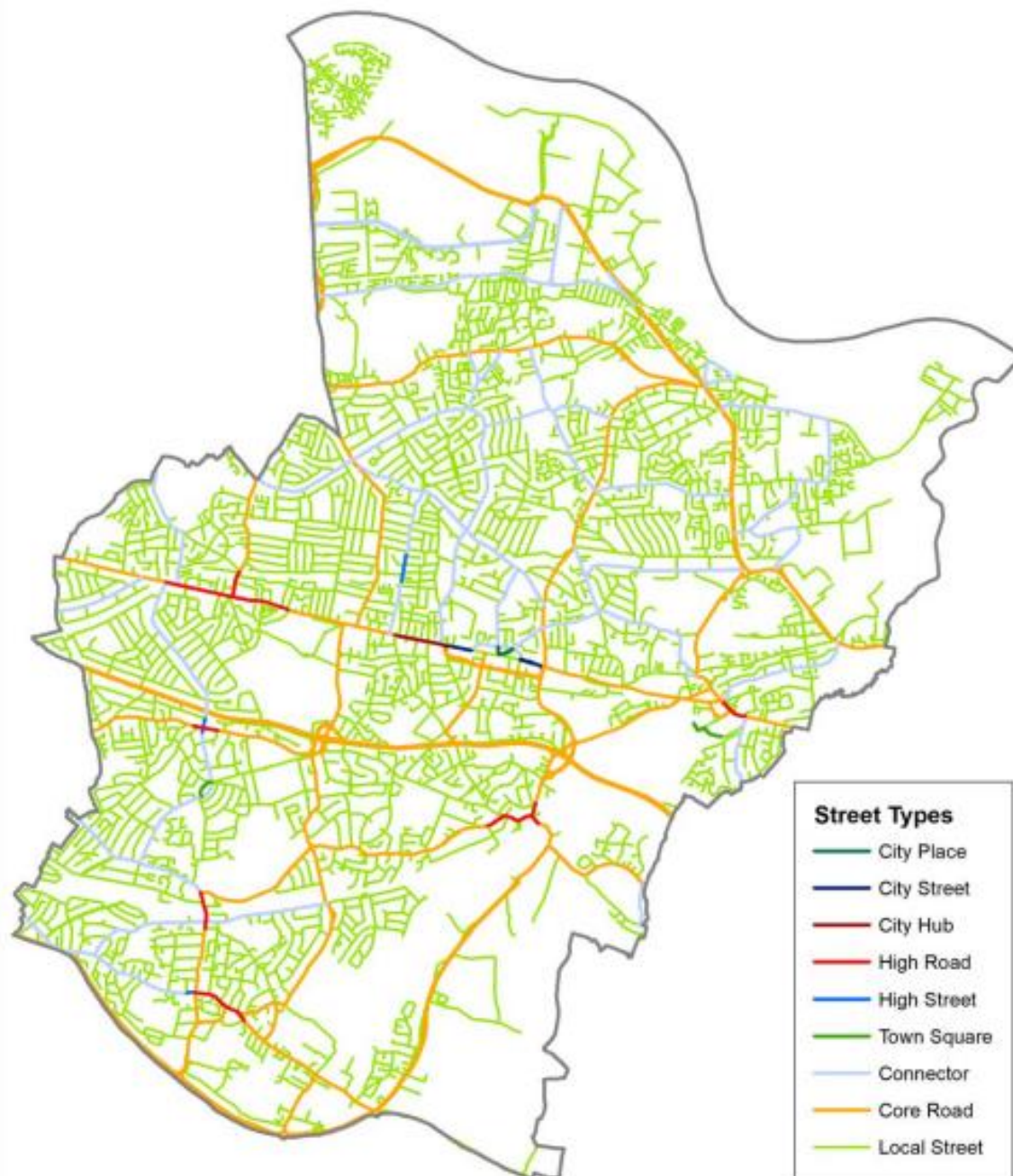


Figure x – Bexley Local Plan (London Borough of Bexley)

Local Plan Policy DP24 is relevant to LIR topic(s):

- Landside Transport

Local Plan Policy DP28 – Contaminated land and development and storage of hazardous substances

Where development is proposed on contaminated land or potentially contaminated land, a desktop study and site investigation, including appropriate proposals for remediation will need to be carried out where required.

Development proposals for hazardous installations and development proposals within the relevant consultation zones for existing hazardous installations must consult with the Health and Safety Executive (HSE).

Local Plan Policy DP28 is relevant to LIR topic(s):

- Ground Conditions and Soils

Local Plan Policy SP13 – Protecting and enhancing water supply and wastewater infrastructure

The Council will:

- a. work with Thames Water in relation to local wastewater infrastructure requirements and support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts;
- b. promote improvements to water supply infrastructure, particularly within the defined Sustainable Development Locations, to contribute to security of supply in a timely, efficient and sustainable manner taking energy consumption into account;
- c. promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, taking account of catchment plans;

Crossness Sewage Treatment Works (CSTW)

- d. support the protection of CSTW as a key infrastructure asset, from the risks of flooding;
- e. promote public access to the Thames Path through CSTW and the conservation and enhancement of the Crossness Beam Engine House, including the site and buildings within its curtilage, and seek to affect these by means of planning obligations in the event of substantial planning permissions being contemplated in the vicinity.

Local Plan Policy SP13 is relevant to LIR topic(s):

- Water Environment and Flood Risk

Local Plan Policy DP29 – Water quality, supply and treatment

Development proposals should not adversely affect the quality or quantity of water in watercourses or groundwater. New development will be required to protect and/or enhance the water quality of existing water resources, such as watercourses and groundwater.

Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions or obligations to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.

The Council will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

All development proposals must provide on-site treatment or a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider, and should consider future access to the existing sewerage systems for maintenance and upsizing purposes.

When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that:

- a. there is no adverse amenity impact on future occupiers of the proposed development or;
- b. the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.

Local Plan Policy DP29 is relevant to LIR topic(s):

- Marine Biodiversity
- Water Environment and Flood Risk
- Ground Conditions and Soils

Local Plan Policy SP14 – Mitigating and adapting to climate change

The Council will actively pursue the delivery of sustainable development by:

- a. supporting developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to net zero;
- b. administering the borough's carbon offset fund, ring-fencing payments to implement projects that deliver greenhouse gas reductions;
- c. investigating opportunities for the funding and development of decentralised energy networks in the borough; and, supporting the provision of infrastructure, including safeguarding routes and land for such use, where necessary;
- d. supporting new and enhanced green infrastructure, including greening of development sites such as living roofs, and the contribution green infrastructure can make to managing flood risk and surface water, and to the mitigation of the urban heat island effect;
- e. supporting integrated water management (IWM) through a coordinated and holistic approach to land and water management, including managing water storage, supply, wastewater, flood risk, quality of watercourses and water bodies and the wider environment;

- f. applying the recommendations of Bexley's Strategic Flood Risk Assessment, Local Flood Risk Management Strategy, and Integrated Water Management Strategy;
- g. directing new development into the most sustainable locations by applying the flood risk sequential test across the borough and the exception test to the site allocations in this Local Plan;
- h. following the sequential approach to flood risk management advocated in national planning policy and its associated practice guidance;
- i. working with the Environment Agency and others to ensure the recommendations of the TE2100 Plan are implemented in new and existing developments, to keep communities safe from flooding in a changing climate and improving the local environment; and,
- j. supporting the protection of key infrastructure assets from the risks of flooding.

Local Plan Policy SP14 is relevant to LIR topic(s):

- Water Environment and Flood Risk
- Climate Resilience
- Greenhouse Gases
- Land Use and Consideration of Alternatives

Local Plan Policy DP31 – Energy Infrastructure

Developments within heat network priority areas should be designed to facilitate cost-effective connections to the existing or proposed network in accordance with the London Plan.

In designated heat network priority areas, proposals for the development of decentralised energy network infrastructure and related apparatus, including the use of low carbon technology, will be supported.

Proposals for major developments that produce heat and/or energy should consider how they can contribute to the supply heat in a designated heat network priority area or demonstrate that this is not technically feasible or economically viable.

Local Plan Policy DP31 is relevant to LIR topic(s):

- Climate Resilience
- Greenhouse Gases
- Land Use and Consideration of Alternatives

Local Plan Policy DP32 – Flood Risk Management

Planning for flood risk:

In areas at risk of flooding, as identified in the Bexley Strategic Flood Risk Assessment (SFRA), development proposals must:

- a. be within a Sustainable Development Location, designated industrial location or the Thamesmead and Abbey Wood Opportunity Area if the site is within Flood Zones 2 and 3a, except for householder development above defined flood levels, and the development type is acceptable within the flood zone, as only these locations have passed the Local Plan sequential test;
- b. apply the exception test, where required, to sites within Flood Zones 2 and 3a that have met the requirements of part 1a;
- c. comply with the guidance and recommendations set out in the Bexley SFRA Level 1 and Level 2;
- d. apply the sequential approach advocated in the NPPF to all sources of flooding, not just tidal and fluvial;
- e. be used as an opportunity to reduce the causes and impact of flooding;
- f. make as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and,
- g. provide floodplain storage capacity as close to the development as possible, where the proposed development will reduce this capacity.

Tidal and fluvial flooding:

Habitable rooms in residential development within the fluvial flood zones, should be set 300mm above the predicted 1 in 100 year plus climate change peak flood water level, and within the tidal flood zones, should be set at the predicted 1 in 200 year annual probability

Development in areas designated as Functional Floodplain (as identified in the SFRA Level 1 and the Policies Map) will not be permitted outside of water-compatible development, as defined in the NPPF

All proposals for development in Flood Zones 2 and 3, and all proposals on sites of 0.25 hectares or larger regardless of what flood zone the site is in, must include a site-specific flood risk assessment (FRA), including a drainage impact assessment.

New developments in riverside locations are required to help reduce flood risk now and into the future.

Development proposals located within 100 metres of the Thames tidal flood defences should demonstrate consideration of and act on the recommendations of the TE2100 Plan and be designed in such a way as to easily facilitate the raising and re-engineering of the tidal flood defences.

Basements will not be permitted in Flood Zones 2 or 3

Surface water, groundwater and sewer flooding:

Development must not increase flood risk on-site or off-site, and exceedance flows must be considered and appropriately managed.

All basement developments should include, within their proposal, protection to the property by installing, for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Safe refuge, access and egress in, to and from development:

New developments below the predicted flood water level should include a detailed evacuation plan that clearly outlines how people can easily leave to safety or move upwards from the lower floors to safety.

Site design in floodplains must facilitate safe escape, access and egress. Only in exceptional circumstances where this cannot be demonstrated should the emergency plan be to reside in situ and escape upwards in a building.

All development that is intended to be occupied below

Local Plan Policy DP32 is relevant to LIR topic(s):

- Water Environment and Flood Risk
- Climate Resilience

Local Plan Policy DP33 – Sustainable drainage systems

All development proposals, whether increasing or decreasing the impermeable area of the site, will be required to manage surface water through sustainable drainage systems (SuDS) in line with all national, regional and local policies and related guidance, in order to minimise flood risk, improve water quality and enhance biodiversity and amenity.

In addition, all development proposals will be required to demonstrate that:

- a. the drainage for the site achieves greenfield runoff rates for flood events up to and including 1 in 100 years plus 40% climate change;
- b. surface water run-off has been reduced by sustainably managing run-off on site;
- c. permeable paving has been used for hardstanding areas (e.g. car parks);
- d. the nature of water flow (both surface water and groundwater) across a steeply sloping site has been considered in order to provide suitable SuDS; and,
- e. water reuse mechanisms have been included for either indoor or outdoor purposes

Development proposals on sites of 0.25 hectares or greater require a drainage strategy, which must be accompanied by a suitable maintenance management plan.

Local Plan Policy DP33 is relevant to LIR topic(s):

- Water Environment and Flood Risk
- Climate Resilience

Appendix 2- Other Relevant Policies and Guidance.

Set out below are the relevant Policies as set out in the adopted London Plan (2021). Several policies are relevant to more than one topic that have been identified as relevant local impacts within the Local Impact Report (LIR). In this Appendix, each relevant Policy will be set out, with those topics it relates to set out beneath.

It is also of note that, whilst the entirety of the Policy wording may not be relevant to the topic(s) set out within the LIR, it is considered that at least part of the scope or an element of the Policy is relevant. As required, the full wording of the Policy is set out below. The Policies are set out in the order they appear in the adopted London Plan.

Policy D3 – Optimising site capacity through the design-led approach

The design led approach:

- A. All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.
- B. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C. In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.
- D. Development proposals should:

Form and layout:

- 14)enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 14)encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 14)be street-based with clearly defined public and private environments

- 14) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience:

- 14) achieve safe, secure and inclusive environments
- 14) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 14) deliver appropriate outlook, privacy and amenity
- 14) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 14) help prevent or mitigate the impacts of noise and poor air quality
- 14) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character:

- 14) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- 14) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- 14) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy
- 14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

- E. Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

London Plan Policy D3 is relevant to LIR topic(s):

- Air Quality
- Noise and Vibration
- Landside Transport
- Land Use Consideration and Alternatives

London Plan Policy D11 – Safety, security and resilience to emergency

- A. The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register
- B. Boroughs should work with their local Metropolitan Police Service ‘Design Out Crime’ officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British

Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

- C. Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

London Plan Policy D11 is relevant to LIR topic(s):

- Water Environment and Flood Risk

London Plan Policy D13 – Agent of Change

- A. The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.
- B. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- C. New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- D. Development proposals should manage noise and other potential nuisances by:
 - 1. ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
 - 2. exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
 - 3. separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, soundproofing, insulation and other acoustic design measures.
- E. Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

London Plan Policy D13 is relevant to LIR topic(s):

- Noise and Vibration

London Plan Policy D14 – Noise

- A. In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by

- 7) avoiding significant adverse noise impacts on health and quality of life
- 7) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 7) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 7) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 7) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation
- 7) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B. Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

London Plan Policy D14 is relevant to LIR topic(s):

- Noise and Vibration

London Plan Policy E4 – Land for industry, logistics and services to support London's economic function

- A. A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, colocation and substitution (see Policy E7 Industrial intensification, co-location and substitution). This should make provision for the varied operational requirements of:
- 10) light and general industry (Use Classes B1c and B2)
 - 10) storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
 - 10) secondary materials, waste management and aggregates
 - 10) utilities infrastructure (such as energy and water)
 - 10) land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
 - 10) wholesale markets
 - 10) emerging industrial-related sectors
 - 10) flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population

- 10) low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space)
 - 10) research and development of industrial and related products or processes (falling within Use Class B1b).
- B. London's land and premises for industry, logistics and services falls into three categories:
- 3) Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
 - 3) Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
 - 3) Non-Designated Industrial Sites¹⁰³ - see Part C of Policy E7 Industrial intensification, co-location and substitution.
- C. The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Industrial intensification, co-location and substitution and supported by Policy E5 Strategic Industrial Locations (SIL).
- D. The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:
1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
 2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
 3. provide capacity for micro, small and medium-sized enterprises
 4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision
 5. support access to supply chains and local employment in industrial and related activities.
- E. Any release of industrial capacity in line with Part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure
- F. Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs
- G. Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.

London Plan Policy E4 is relevant to LIR topic(s):

- Land use and Consideration of Alternatives
- Landside Transportation

London Plan Policy E5 – Strategic Industrial Locations (SIL)

- A. Strategic Industrial Locations (identified in Figure 6.1 and Table 6.2) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.
- B. Boroughs, in their Development Plans, should:
 1. define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in Policy E7 Industrial intensification, co-location and substitution)
 2. develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including improvements to access, public transport, digital connectivity and other related infrastructure) for the functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function
 3. explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Industrial intensification, colocation and substitution).
 4. strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.
- C. Development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function
- D. Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.

Figure x (London Plan) – Greater London Authority*

**The development proposal is within SIL 29 – Belvedere Industrial Area.*

London Plan Policy E5 is relevant to LIR topic(s):

- Noise and Vibration
- Air Quality
- Land Use and Consideration of Alternatives

London Plan Policy E11 – Skills and opportunities for all

- A. The Mayor will work with strategic partners to address low pay and gender and ethnicity pay gaps, and, as set out in his Skills for Londoners Strategy, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.
- B. Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that:
 - 1. enable those people undertaking training to complete their training and apprenticeships
 - 2. ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created
 - 3. increase the proportion of under-represented groups within the construction industry workforce

In partnership with the Mayor, boroughs are encouraged to consider cross borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

Local Plan Policy E11 is relevant to LIR topic(s):

- Socioeconomics

London Plan Policy HC1 – Heritage conservation and growth

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by
 - 1. setting out a clear vision that recognises and embeds the role of heritage in place-making
 - 2. utilising the heritage significance of a site or area in the planning and design process
 - 3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
 - 4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing
- C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify

enhancement opportunities by integrating heritage considerations early on in the design process.

- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse

London Plan Policy HC1 is relevant to LIR topic(s):

- Historic Environment

London Plan Policy HC3 – Strategic and Local Views

- A. Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view
- B. Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.
- C. The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.
- D. The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.
- E. The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.
- F. Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle

ground and background are effectively managed in accordance with the LVMF SPG.

- G. Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

London Plan Policy HC3 is relevant to LIR topic(s):

- Historic Environment
- Townscape and Visual
-

London Plan Policy G1 – Green Infrastructure

- A. London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.
- B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.
- C. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:
1. identify key green infrastructure assets, their function and their potential function
 2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions
- D. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

London Plan Policy G1 is relevant to LIR topic(s):

- Land Use and Consideration of Alternatives

London Plan Policy G4 – Open Space

- A. Development Plans should:
- A. undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required. Assessments should take into account the quality, quantity and accessibility of open space
- B. include appropriate designations and policies for the protection of open space to meet needs and address deficiencies
- C. promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change
- D. ensure that open space, particularly green space, included as part of development remains publicly accessible.

B. Development proposals should:

1. not result in the loss of protected open space
2. where possible create areas of publicly accessible open space, particularly in areas of deficiency

London Plan Policy G4 is relevant to LIR topic(s):

- Land Use and Consideration of Alternatives

London Plan Policy G5 – Urban Greening

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).
3. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

London Plan Policy G5 is relevant to LIR topic(s):

- Water Environment and Flood Risk

London Plan Policy G6 – Biodiversity and access to nature

1. Sites of Importance for Nature Conservation (SINCs) should be protected
2. Boroughs, in developing Development Plans, should:
 - e) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
 - e) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
 - e) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
 - e) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.
 - e) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements
3. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements
 - c) avoid damaging the significant ecological features of the site
 - c) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site

- c) deliver off-site compensation of better biodiversity value.
4. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
5. Proposals which reduce deficiencies in access to nature should be considered positively.

London Plan Policy G6 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Land Use and Consideration of Alternatives

London Plan Policy SI 1 – Improving Air Quality

- 5) Development Plans, through relevant strategic, site-specific and area based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.
- 5) To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:
 - A. Development proposals should not:
 1. lead to further deterioration of existing poor air quality
 2. create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
 3. create unacceptable risk of high levels of exposure to poor air quality
 - B. In order to meet the requirements in Part 1, as a minimum:
 - 4) development proposals must be at least Air Quality Neutral
 - 4) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures
 - 4) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
 - 4) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.
 - 5) Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:
 - A. how proposals have considered ways to maximise benefits to local air quality, and
 - B. what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

- 5) In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.
- 5) Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

London Plan Policy SI 1 is relevant to LIR topic(s):

- Air Quality

London Plan Policy SI 2 – Minimising greenhouse gas emissions

1. Major development should be net zero-carbon.¹⁵¹ This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
 - 4) be lean: use less energy and manage demand during operation
 - 4) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 4) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance
2. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
3. A minimum on-site reduction of at least 35 per cent beyond Building Regulations¹⁵² is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
 - 2) through a cash in lieu contribution to the borough's carbon offset fund, or
 - 2) off-site provided that an alternative proposal is identified and delivery is certain.
4. Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.
5. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
6. Development proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle

Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

London Plan Policy SI 2 is relevant to LIR topic(s):

- Greenhouse Gases

London Plan Policy SI 3 – Energy Infrastructure

- b) Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.
- b) Energy masterplans should be developed for large-scale development locations (such as those outlined in Part A and other opportunities) which establish the most effective energy supply options. Energy masterplans should identify:
 - A. major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
 - B. heat loads from existing buildings that can be connected to future phases of a heat network
 - C. major heat supply plant including opportunities to utilise heat from energy from waste plants
 - D. major heat supply plant including opportunities to utilise heat from energy from waste plants
 - E. opportunities for low and ambient temperature heat networks
 - F. possible land for energy centres and/or energy storage
 - G. possible heating and cooling network routes
 - H. opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
 - I. infrastructure and land requirements for electricity and gas supplies
 - J. implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector
 - K. opportunities to maximise renewable electricity generation and incorporate demand-side response measures
- b) Development Plans should:
 - 1. identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure
 - 2.) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks
- b) Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:
 - 1. the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
 - 1. connect to local existing or planned heat networks
 - 2. use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)

3. use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
4. use ultra-low NOx gas boilers
2. CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
3. where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.
 - b) Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

London Plan Policy SI 3 is relevant to LIR topic(s):

- Climate Resilience
- Greenhouse Gases
- Land Use and Consideration of Alternatives

London Plan Policy SI 5 – Water Infrastructure

- A. In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner
- B. Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.
- C. Development proposals should:
 1. through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
 2. achieve at least the BREEAM excellent standard for the 'Wat 01' water category¹⁶⁰ or equivalent (commercial development)
 3. incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.
- D. In terms of water quality, Development Plans should:
 1. promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans
 2. support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.
- E. Development proposals should:
 - a. seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided

- b. take action to minimise the potential for misconnections between foul and surface water networks
- F. Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage

London Plan Policy SI 5 is relevant to LIR topic(s):

- Water Environment and Flood Risk

London Plan Policy SI 8 – Waste capacity and net waste self-sufficiency

1. In order to manage London's waste sustainably:
 1. the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
 2. existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
 3. the waste management capacity of existing sites should be optimised
 4. new waste management sites should be provided where required
 5. environmental, social and economic benefits from waste and secondary materials management should be created.
2. Development Plans should:
 1. plan for identified waste needs
 2. identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum of waste will be managed
 3. allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 – boroughs are encouraged to collaborate by pooling their apportionment requirement
 4. identify the following as suitable locations to manage borough waste apportionments:
 - A. existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
 - B. Strategic Industrial Locations and Locally Significant Industrial Sites
 - C. safeguarded wharves with an existing or future potential for waste and secondary material management.
3. Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs.
4. Development proposals for materials and waste management sites are encouraged where they
 1. deliver a range of complementary waste management and secondary material processing facilities on a single site
 2. support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets
 3. contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste, and/or
 4. are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI 3 Energy infrastructure Part D1c).

5. Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria
 - A. the nature of the activity, its scale and location
 - B. effective implementation of the waste hierarchy and its contribution to London's circular economy
 - C. achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings – all facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO₂ equivalent per kilowatt hour of electricity produced
 - D. the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) – where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed
 - E. the transport and environmental impacts of all vehicle movements related to the proposal – the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported.
6. When planning for new waste sites or to increase the capacity at existing sites the following should be considered:
 - 3) job creation and social value benefits, including skills, training and apprenticeship opportunities
 - 3) local need
 - 3) accessibility of services for local communities and businesses.

London Plan Policy SI 8 is relevant to LIR topic(s):

- Air Quality
- Noise and Vibration
- Land Use and Consideration of Alternatives
- Socioeconomics
- Landside Transport
- Greenhouse Gases

London Plan Policy SI 9 – Safeguarded waste sites

- A. Existing waste sites should be safeguarded and retained in waste management use.
- B. Waste facilities located in areas identified for non-waste related development should be integrated with other uses as a first principle where they deliver clear local benefits
- C. Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.
- D. Development proposals that would result in the loss of existing sites for the treatment and/or disposal of hazardous waste should not be permitted unless compensatory hazardous waste site provision has been secured in accordance with this policy
- E. Development proposals for the relocation of waste sites within London are supported where strategic waste management outcomes are achieved.

London Plan Policy SI 9 is relevant to LIR topic(s):

- Land Use and Consideration of Alternatives

London Plan Policy SI 12 – Flood risk management

- 7) Current and expected flood risk from all sources (as defined in paragraph 9.2.12) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers
- 7) Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should cooperate and jointly address cross-boundary flood risk issues including with authorities outside London.
- 7) Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 7) Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier
- 7) Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.
- 7) Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.
- 7) Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat

London Plan Policy SI 12 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Water Environment and Flood Risk

London Plan Policy SI 13 – Sustainable drainage

- A. Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.
- B. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

There should also be a preference for green over grey features, in line with the following drainage hierarchy:

1. rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
 2. rainwater infiltration to ground at or close to source
 3. rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
 4. rainwater discharge direct to a watercourse (unless not appropriate)
 5. controlled rainwater discharge to a surface water sewer or drain
 6. controlled rainwater discharge to a combined sewer
- C. Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.
- D. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

London Plan Policy SI 13 is relevant to LIR topic(s):

- Terrestrial Biodiversity
- Marine Biodiversity
- Climate Resilience
- Water Environment and Flood Risk
- Land Use and Consideration of Alternatives

London Plan Policy SI 16 – Waterways – use and enjoyment

1. Development Plans and development proposals should protect and enhance waterway infrastructure.
2. Development proposals should protect and enhance, where possible, water-related cultural, educational and community facilities and events, and new facilities should be supported and promoted, but should take into consideration the protection and other uses of the waterways.
3. Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure does not negatively impact on navigation or on the protection of the waterway (see Policy SI 17 Protecting and enhancing London's waterways)
4. Development proposals adjacent to waterways should protect and enhance, where possible, existing moorings. The provision of new moorings and/ or required facilities (such as power, water and waste disposal) should be supported if they are:
 - A. off-line from main navigation routes, in basins or docks, unless there are negative impacts on navigation or on the protection of the waterway (see Policy SI 17 Protecting and enhancing London's waterways)
 - B. appropriately designed including the provision of wash mitigation, where necessary
 - C. managed in a way that respects the character of the waterways.
5. Existing access points to waterways (including slipways and historic steps) and alongside waterways (including paths) should be protected and enhanced.

6. Development proposals along waterways should protect and enhance inclusive public access to and along the waterway front and explore opportunities for new, extended, improved and inclusive access infrastructure to/from the waterways.
7. Development proposals should improve and expand the Thames Path and the towpaths, improve alignment with the waterway where relevant, enhance them as walking routes, and provide better linkages to the transport network. This will require collaboration with relevant partners including London boroughs, the PLA, the Canal and River Trust, the Environment Agency and Natural England, as well as landowner, developer and community representatives. These paths will be public and not private spaces.

London Plan Policy SI 16 is relevant to LIR topic(s):

- Land Use and Considerations of Alternatives

London Plan Policy T1 – Strategic approach to transport

- A. Development Plans should support, and development proposals should facilitate
 - 2) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041
 - 2) the proposed transport schemes set out in Table 10.1.
- B. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

London Plan Policy T1 is relevant to LIR topic(s):

- Landside Transport
- Land Use and Consideration of Alternatives

London Plan Policy T2 – Healthy Streets

Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

Development Plans should:

promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.

identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.

In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators

Development proposals should:

demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance

reduce the dominance of vehicles on London's streets whether stationary or moving
be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

London Plan Policy T2 is relevant to LIR topic(s):

- Landside Transport
- Greenhouse Gas Emissions
- Noise and Vibration
- Land Use and Considerations of Alternatives

London Plan Policy T4 – Assessing and mitigating transport impacts

Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity

When required in accordance with national or local guidance,¹⁷⁹ transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.¹

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.

The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

Development proposals should not increase road danger.

London Plan Policy T4 is relevant to LIR topic(s):

- Landside Transport

London Plan Policy T5 – Cycling

Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:

supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure

securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle

parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two shortstay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.

Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.¹⁸² Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.

Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.

Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.

Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

London Plan Policy T5 is relevant to LIR topic(s):

- Landside Transport
- Land Use and Considerations of Alternatives

Appendix 2 Continued - Other Relevant Policies and Guidance.

Set out below are the relevant Chapters as set out in the National Planning Policy Framework (NPPF) (2023) (as amended). Several Chapters are relevant to more than one topic that have been identified as relevant local impacts within the Local Impact Report (LIR).

It is also of note that, whilst the entirety of the Chapter wording may not be relevant to the topic(s) set out within the LIR, it is considered that at least part of the scope or an element of the Chapter is relevant. The full wording of each Chapter of the NPPF has not been included below, given the length and detail contained within each Chapter. The Chapters can be read by following this link:

https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf

NPPF (2023)- Relevant Chapters:

- Chapter 2 (Achieving sustainable development)
- Chapter 4 (Decision-making)
- Chapter 6 (Building a strong, competitive economy)
- Chapter 8 (Promoting healthy and safe communities)
- Chapter 9 (Promoting sustainable transport)
- Chapter 11 (Making effective use of land)
- Chapter 12 (Achieving well-designed and beautiful places)
- Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)
- Chapter 15 (Conserving and enhancing the natural environment)
- Chapter 16 (Conserving and enhancing the historic environment)

