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Your Ref. EN10128

Date: 12/09/2025

Mr. James Dawkins,
Department for Energy Security and Net Zero,
3-8 Whitehall Place,
London,
SW1A 2AW

Dear Mr. Dawkins,

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure)
Rules 2010.**

**Application by Cory Environmental Holdings Limited ("the Applicant") for an
Order granting Development Consent for the proposed Cory Decarbonisation
Project ("The Proposed Development").**

REQUEST FOR INFORMATION.

Thank you for your letter dated 2nd September 2025 which requests further information from the Council. In this letter, the Council has been asked two questions which are listed below in **bold**, with the Council's response below that in *italics*.

Planning Obligation with Thamesmead Golf Course; Deed Obligation A

5. The Applicant, London Borough of Bexley Council ("LBBC") and Peabody Trust are requested to provide updates on the progress of the Section 106

agreement in relation to the provision of offsite Biodiversity Net Gain at Thamesmead Golf course.

Since the closing of the examination it is understood by the Council that negotiations in relation to the S106 agreement between the Applicant and Peabody remain on-going and therefore completed agreements have not been signed and sealed yet. Notwithstanding this, once an agreement is reached the Council stands ready to review any legal document drafted and sign and seal once content.

Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy ("oLaBARDS") – Requirement 12

6. The Applicant and LBBC are invited to comment on the amended wording relating to Requirement 12 of the DCO, as outlined below:

"12.– (1) No part of the authorised development may commence until a written landscape, biodiversity, access and recreation delivery strategy for that part has been submitted to and approved by the relevant planning authority in writing, in consultation with TWUL.

(2) The landscape, biodiversity, access and recreation delivery strategy submitted for approval must be substantially in accordance with the outline landscape, biodiversity, access and recreation delivery strategy, except insofar as it provides for multiple full versions in paragraph 3.2.4 of the outline landscape, biodiversity, access and recreation delivery strategy.

(3) The landscape, biodiversity, access and recreation delivery strategy must include details of all proposed hard and soft landscaping works and ecological mitigation and enhancement measures (as applicable for the relevant numbered work) for that part and where applicable include for that part".

The Council, in principle, does not object to the submission of multiple LaBARDS for approval by the LPA, as it is acknowledged that at this time certain details which would impact on the ability to submit a single comprehensive LaBARDS at the outset have not been finalised, such as the detailed design or the construction method.

Notwithstanding this, if multiple LaBARDS were to be submitted it is the view of the Council that an overarching LaBARDS would first be required for approval, to set out the framework and clearly define the scope of each subsequent LaBARDS, for example, by topic, work number, phase and geographical area. Any subsequent LaBARDS would then be prepared in accordance with, and feed directly into, the overarching framework. This would then create a scenario whereby (if necessary) multiple LaBARDS could be read as one document and provide confidence that there are no gaps or inconsistencies in delivery, whilst still providing the necessary flexibility to reflect the evolving design and construction methodology. It should also be ensured that all parts of the authorised development are ultimately covered by an approved LaBARDS prior to commencement.

Notwithstanding the above, it is noted that new wording for Requirement 12 is due to be submitted by the Applicant. The Council has reviewed this wording and has raised concerns in relation to it. Whilst the Council accepts that preferred BNG Opportunity Area may not be

secured and that there may be a need to find alternative locations (part 5(c)), it is the Council's preference that any alternative location be as a first attempt found within the London Borough of Bexley. If a suitable site or sites cannot be found within the London Borough of Bexley then an explanation and justification as to why a site or sites cannot be found and that it is necessary to look outside of the borough needs to be provided.

The Council is of the same opinion that this approach needs to be considered in relation to part 6 of Requirement 12.

The Council has spoken with the Applicants on this matter, and it is understood that suitable wording will be added to the Outline LaBARDs in order to alleviate these concerns. If this wording were to be taken out of the Outline LaBARDs the Council would ask that suitable wording is added to Requirement 12 in order to secure the above.

I hope that this clarifies the Council's position in relation to the above questions. If you have any further questions, please do not hesitate to contact me using the details above.

Yours faithfully



Area Team Manager-North