

Cory Riverside Energy Park

Written Representation (WR) from Friends of Crossness Nature Reserve (FoCNR)

It is unlikely that the Friends of Crossness Nature Reserve will be able to formally present at the Issue Specific Hearing on environmental matters or attend the Accompanied Site Inspection in June.

Background to the Friends of Crossness Nature Reserve and the Thames Marshes in Bexley

In 1994 Thames Water (TW) received approval from Bexley Council for the development of the Sludge Powered Generator (SPG) (completed 1998). A Section 106 agreement required the improvement of adjacent Thames Marshes, creation of a nature reserve (later designated a Local Nature Reserve by Bexley Council in 2002), provision of site management and the community involvement resulting in the establishment of The Friends of Crossness Nature Reserve (FoCNR). A representative of the Friends group (myself) sits on the Crossness Nature Reserve management committee alongside Bexley Council, Thames Water and the Environment Agency. The Friends group is administered by Thames Water's Biodiversity Team Manager/Crossness Nature Reserve Manager.

Following the employment of a part-time warden in 2000, Thames Water later employed a full-time warden to manage a wider area of land including the Crossness Southern Marshes. This began in 2004 and has continued to this day.

Over time the Thames Marshes east to Kent have been fragmented through mostly small-scale riverside industry. Within Bexley significant changes began in the 1960's with the Thamesmead housing development and more recently redundant riverside industries have been replaced with numerous warehouses and logistic centres. Additionally TW have expanded the sewage treatment works, developed the Sludge Powered Generator (SPG) (now decommissioned) and Cory has developed the Riverside Resource Recovery Facility (RRRF). Views from Crossness Local Nature reserve (CLNR) have increasingly been obscured by commercial developments e.g. Iron Mountain, Asda warehouses. In 2014 Bexley Council approved '3 industrial units for mixed-use' (13/00918/OUTM) – immediately abutting the nature reserve on Norman Road. In 2016 Bexley Council approved (15/02926/OUTM) the development by Cory of two four story Data Centres on Norman Road within what had previously been open mosaic land (albeit within the Local Plan as employment land). Whilst two of the three Norman Road units and the Data Centres are yet to be built the encroachment onto the perimeter of the nature reserve will be both unsightly and damaging to wildlife and certainly the enjoyment of visitors.

Crossness Local Nature Reserve has undergone significant improvements over the years through financial investment from TW, Bexley Council and in the early 2000's, the Office of the Deputy Prime Minister (ODPM). Habitat enhancements have seen an increase in biodiversity, increased population of water voles, arrival of shrill carder bee, and breeding birds including little ringed plover, Cetti's warbler, pochard, gadwall and most recently lapwing.

Such is the recognised importance of Crossness Local Nature Reserve, that many specialist naturalists (including organised groups from London Natural History Society (LNHS)) have undertaken surveys of flora, invertebrates, bees and bats – all in addition to the wealth of bird records which have built upon the records of LNHS dating back to 1936.

The entire aforementioned management work and habitat enhancement has been under the guidance of the reserve warden and with considerable input and work by local volunteers mostly drawn from the FoCNR. In any one year between 180-280 individuals turn up to volunteer – over 1200 hours of volunteering effort is given annually.

Whilst Cory will have made significant financial investment to deliver their plan for the REP, The Friends do not have any financial resources to counter the Cory case. We are (almost 400 in number) a mixture of enthusiastic amateur naturalists (some with many years experience enjoying the wildlife and improvements of CLNR), and members from the local community who, with their families, enjoy the relative tranquillity, open space and riverside environment. There are many others from across the Borough, and beyond, who, having learnt about the wildlife viewing, photographic opportunities or just a place to walk, cycle through or walk the dog, have made an attachment with the site that cannot be quantified in financial terms or offer an “evidence” based argument.

The aforementioned Planning approvals on Norman Road have yet to be fully developed so the impact on wildlife and visitors cannot be judged although we do know that the wonderful song of the now rare skylark will definitely be lost (their specialised habitat is limited to the Borax fields/Cory Data Centres). The Friends voiced their objections to these developments further encroaching on to what once was an open sky landscape. With these two developments and the proposed REP it would be quite understandable if a) visitors found the site too hemmed in to be worthy of visits and b) those magnificent volunteers who have invested so much of their time and themselves, assisting with the habitat enhancement, would feel totally demotivated by the apparent lack of understanding and awareness by the authorities. If approval is given, they might just give up, and all that time and financial investment (TW/Bexley Council/ODPM) will have come to nothing – not to mention the impact on the wildlife which is what motivates the majority of us in the first place.

In conclusion to this background – The Friends of Crossness Nature Reserve object to the REP proposal based on the extreme close proximity to, and impacts on terrestrial, and potentially aquatic, biodiversity on the Crossness Marshes Local Nature Reserve and Erith Marshes SINC. The proposed development would see further severance of the connectivity between the River Thames and adjacent LNR, creating a hemmed-in nature reserve and further reducing the open landscape character of the marshes. We offer some reasons but will not be able to provide “evidence” based arguments in most cases. Our evidence is embodied in the emotional attachment we have with open spaces, wildlife, nature and the healthy outcomes they help provide.

Response to the REP proposal.

I am grateful that along with the TW Biodiversity Team Manager/Warden of CLNR, to have had the opportunity to meet with representatives of Cory Riverside Energy and their Ecological consultant (27th November 2018 and 25th April 2019). At the first meeting we were taken through the environmental/biodiversity issues and invited to pursue the signing of a SoCG. A draft SoCG was proposed on 6th February 2019, after lengthy investigation with TW a response from FoCNR was sent to Cory on 17th April in advance of the meeting on 25th April. There were clearly a large number of areas of disagreement and/or areas requiring further clarification from Cory. At the time of completing this Written Representation, (18th May), the SoCG sits with Cory and has not progressed beyond draft form.

- **Cable Route** At the second meeting we were informally notified that the decision on the cable route (an area of great concern to us) had been made and it was favourable to our request. It would be along Norman Road and not along the public footpath through the nature reserve, adjacent to the Protected Area and Island Field. Whilst this is to be welcomed, the disruption caused, though severe, would have been only temporary whilst the final outcome of the project would be the REP, a permanent, unsightly feature, generating traffic noise, air pollution and potential lighting impacts on the wildlife. Of course if this decision should be changed we would strongly object to the cable route along the footpath given its close proximity to ditches with water voles and hedgerows with nesting

birds, basking reptiles and foraging butterflies. The disruption would also impair visitor movement around the reserve and connectivity with the Southern Marsh.

- **Design – Solar Panels – bio-solar green roof.** Another objection during the consultation process was the size/scale and design of the building. If it was to be approved we preferred the curved roof, thereby in keeping with the two adjacent riverside buildings either side of the REP (unlike the ugly boxes proliferating along the Thames to the East). Cory argued against this in preference to the flat or stepped (final design) due to maximising generation of power through solar panels. Nowhere have we seen any reference should this go ahead to Cory incorporating bio-solar green roofs to the project. Not only are they efficient for solar energy but also add some mitigation to the potential loss of biodiversity. Skylark, lapwing and invertebrates could take advantage of green roofs. There are recognised consultancies/papers available. Both the GLA and Bexley Council have green roof policies that should be incorporated (see references).
- **Construction/Operational Noise** The ES states that elevated noise levels may cause displacement of breeding birds in the vicinity but goes on to state the “effects are Not Significant due to an abundance of alternative habitats”. There is, to our knowledge, nowhere else within the CLNR boundary with water levels and associated vegetation comparable with the West Paddock for lapwing – only recently established due to habitat management by TW and the FoCNR volunteers. Lapwing is UK red listed and cannot be considered “not significant” – its loss would be significant for the whole of the Thames marshes in Bexley. The West Paddock is one of the most important habitats for breeding birds and wintering high tide roosts yet during the operational phase; the main vehicle circulation route on the REP will take traffic directly alongside the West Paddock and Sea Wall Field. Additionally the anaerobic digestion output collection route will be right alongside this sensitive habitat. This is of great concern. Cory might argue they can erect some sound attenuation along this route but that would only add to the ugliness of the site adjacent to the nature reserve.
- **Lighting** The problems for barn owls is referred to later. Lighting impact on bat species is also of great concern. Bat Conservation Trust (BCT) in their “Bats in the Built Environment Series” Guidance note 08/18 Bats and Artificial Lighting published August 2018 provide a lot of evidence that spillage of artificial light into previously traditional commuting/foraging routes will subsequently be avoided by species, and that light can have an effect on the feeding behaviour of bats when they are away from their roost. Should this development be approved then full compliance with BCT recommendations must be ensured. However, we would suggest this proposal cannot be seen in isolation – the cumulative impact of the existing buildings along with the yet to be constructed Data Centres/3 industrial units, will undoubtedly add to the burden of night flying species under an accumulation of artificial lighting.
- **Shading** The impact on ditches, vegetation and invertebrates of this high building so close to the perimeter of the nature reserve cannot easily be quantified. Our research has not been able to find any studies or practical examples of a building of this size being so very close to a similar site (nature reserve). Even the SPG and RRRF are contained within a decent sized compound and as such they do not impact as much as the REP. Some fields will, according to the Design and Access Statement (6.4.2) be shaded for much, if not all of the year. Sea Wall field will be in shade almost all year round with vegetation growing periods of March being of particular concern.

Air Quality - we are not qualified ourselves to provide evidence for or against the development in terms of the impacts on air quality but we have read enough from the GLA to understand air quality is only going to be poorer with the possible arrival of the REP. Something else that goes against the need for improved health. It seems during the construction/decommissioning phases of the proposal, dust deposition and emissions of NO_x from increased road traffic and plant will be an added hazard.

Given the adjacency of the Anaerobic Digestion plant to the nature reserve we are concerned about the potentially significant localised NOx concentrations affecting the terrestrial biodiversity receptors on the Crossness Local Nature Reserve.

Waste Management - living in a Borough that proudly boasts its own waste management and recycling achievements, it has been galling to see barge after barge of West London Boroughs' waste being delivered to the Cory RRRF. Not to mention the large number of lorries up and down Norman Road. A proposed REP development does strike us as an insult when those same West London boroughs are not achieving recycling targets. We have heard representatives from Cory argue that since China stopped taking UK waste it has to be dealt with somewhere. Well not in Bexley we would protest.

I am writing this in the same week that the United Nations has published the Nature's Dangerous Decline "unprecedented" Species Extinction Rates "accelerating" report highlighting a potential extinction of one million species worldwide. One of the primary reasons suggested is the wholly unsustainable drive by nations for "economic growth", destroying habitats worldwide for food production a third of which is thrown away in UK by consumers like us. It is time UK government together with local authorities began to reverse this obscene proliferation of waste. The GLA is making the right noises, setting the correct policies and targets for waste reduction and recycling. This proposal cuts right across that aspiration.

If the UN is able to set the agenda for the most urgent action and UK Government/GLA meets its own targets there will be no requirement for expensive, air polluting, developments like this REP.

In 2018 The Worldwide Fund for Nature published the Living Planet report stating 60% of the world's wildlife is in decline and under threat of extinction.

In 2016 50 UK environment bodies jointly published the State of Nature report stating 1 in 10 species of UK wildlife is threatened with extinction – many of those species (mentioned elsewhere) are found at Crossness.

It is time to put wildlife and the habitats upon which they rely at the top of the agenda and not an afterthought that can be mitigated against.

- **Species General** – 11.9.51 of Environmental Statement (ES) states "Impacts on breeding birds through temporary loss of habitat if cable route goes through the reserve". We hope the decision stands to not take the cable route along this path but if it does, we would urge no work takes place during the breeding season – (chapter 6 3.2.8 identifies 23 different species (including 5 of conservation concern) potentially breeding). This cannot be stated as a "not significant" impact on birds of "local" conservation importance. Important bee species, grass snake and slow worms also recorded.

The nature reserve is primarily managed grassland with a network of ditches, open water, reed beds and low scrub– this suggests a higher density of ground and low scrub nesting species all susceptible to avian predation – the proliferation of very close buildings provide extra perching places for crows, magpies and even peregrine falcons. Wading species including lapwing, ringed and little ringed plover plus wildfowl are particularly vulnerable. The REP just adds more pressure on these species from avian predation.

Barn owl – Three of four barn owl nest boxes have been used by breeding barn owls and kestrels (schedule 1 and amber listed respectively) in recent years. Indeed barn owls are present this Spring/early summer. The close proximity of the construction site (proposed set-down/temporary construction areas (Norman Road) and actual construction on site), along with any night time noise/lighting (during construction and when operational) will directly

impact on two of those four boxes and potential disturbance to feeding/foraging behaviour. These impacts have previously been highlighted with the proposed Data Centres/3 Industrial units on Norman Road. A schedule 1 species is being wholly constrained by the cumulative impact of these developments.

Reptiles - We find it rather ironic that the ecologist's surveys suggest low population of reptiles when only in 2017 Bexley Council designated CLNR as the most suitable site in the Borough for a reptile receptor with over 800 slow worms and nearly 400 common lizards being translocated.

Visual Impact/Health and Well-being as previously stated the FoCNR has neither the financial resources to employ ecologists or has the professional ecological expertise within our ranks. We report on what we see, hear and feel. We have set out above a summary of some specific concerns relative to design, construction, species and habitats. However, a major objection and concern is the cumulative visual impact of this (and other approved developments) on our day to day enjoyment of the nature reserve and the impact of habitats and wildlife.

Many of us have been visiting long enough to recall the view to be interrupted only by the odd industrial building, (e.g. the low level sub-station on land now approved for development (3 industrial units) on Norman Road), all rather unique in design. In the late 1990's the adjacent TW (SPG) at least brought with it some security (or so we thought) for the nature reserve with the associated Section 106 agreement and subsequent LNR designation. The distant views eastwards have increasingly been dominated by an ever advancing array of huge logistic units containing stuff to be moved around the country – none of those approvals have been required, as TW was, to mitigate loss of habitats or enhance bio-diversity. Ten years ago Cory developed the RRRF – again, inexplicably Bexley Council required no mitigation or enhancement for bio-diversity.

We don't know of any of our members or friends who come to view this commercially driven hotch potch of buildings or incinerators. They come to enjoy the wildlife, many of them in school groups having their first experience of wildlife or pond dipping. Much of the early investment from TW, ODPM, and Bexley Council was to improve access, connectivity with other sites and to engage the local community. There has been much success with educational activities, guided walk and volunteer opportunities. For many in this already densely populated area a walk in a relatively open space with fields and horses and abundant wildlife has been a life changing experience with many joining the Friends and getting involved in reserve activities. The gradual (more recently speedy) encroachment along the perimeter of the nature reserve has elicited much dismay and anger from Friends/visitors. There has been disappointment at the final design choice by Cory – another set of "stepped" boxes to block our view of the River Thames. At least if approval is given and they install a green roof (bio solar) there might be some compensation in viewing some wildlife attempting to use the roofs. We re-iterate lapwings and skylarks are known to take advantage of such man made habitats. It is interesting to walk the Thames path towards Woolwich or Crayford and look back to Crossness – the TW SPG and Cory RRRF stand out at least as something different to the rest of the surroundings – another set of boxes is not what is needed.

Given Government health warnings and the accepted benefits of being out in open spaces and connecting with nature, it is sad that even a wonderful urban nature reserve such as Crossness is becoming more of a small island within a commercially driven environment. Visitors appreciate the openness of the reserve within the urban environment but increasingly demonstrate their alarm when confronted with the images of how it will look in a few years' time when Cory have delivered their "vision" for the area surrounding the nature reserve. Even section 9 of the ES acknowledges that "large scale development on what is currently open land will reduce connectivity between marshland areas and river, and change the character and view in the area".

Development encroachment along the perimeter of Crossness Nature Reserve



An indicative schematic of the impact of current, approved and proposed developments on the Crossness Marshes Nature Reserve

Cumulative impacts on Wildlife

The Friends of Crossness have worked closely with Thames Water's Bio-diversity Team Manager to draw together our experiences and wildlife records to consider the cumulative impact on the nature reserve and its wildlife. As a result we make a joint representation on this section. We feel that the proposal has not adequately taken into account the cumulative biodiversity impacts of the REP with the consented the Data Storage Centres (15/02926/OUTM – approved 11/7/2016) and '3 industrial units for mixed-use' (13/00918/OUTM) which will have considerable biodiversity impacts. The consented data centres are on open-mosaic habitat that support a number of rare and scarce breeding birds.

Para 11.10.6 of the Environmental Statement, references 'potential impacts to...common breeding birds from construction of the data centre' thereby listed as Not Significant. However, Skylark (a red list species of conservation concern) breeds there annually and at least two pairs appear to be breeding again this year (2019); Ringed Plover (a red list species); Little Ringed Plover have bred in the past; Cetti's Warbler (Schedule 1 species); and Linnet (red list species) all breed on the Cory/Borax Fields – they are not common breeding birds. The land immediately to the south of the Data Centres (Norman Road Field) – subject to further development (" (13/00918/OUTM), supports breeding Kestrels (amber species of conservation concern) and Barn Owls (a Sch1 species), also not common breeding birds. Some of these species will be lost with the Data Centre development (Skylark and Ringed Plover have specific habitat requirements which limits their breeding opportunities in the area) while others (Linnet, Cetti's Warbler) will be impacted but can hopefully use nearby habitat as an alternative. Barn Owls could be negatively impacted by the noise disturbance, construction vehicle movement and lighting impacts –there are no suitable alternative sites within the Erith Marshes SINC.

The removal of the invertebrate-rich open mosaic habitat for the Data Centres, and subsequent loss of forage to other fauna, will likely result in an impact on bird life on the immediately adjacent Crossness LNR and Erith Marshes SINC. Although the loss of this habitat is said to be compensated through the creation of smaller Open Mosaic within the application boundary and a financial contribution to

Environment Bank, it will not eliminate the impacts to species on Crossness LNR, and there is not enough space within the REP footprint to provide the same size habitat being lost.

Compensation/mitigation:

In terms of mitigation, if the data storage facilities are to be included within the Application Boundary – as stated in 11.10.6 – then the area of open mosaic habitat loss is considerably more than can be delivered within the REP footprint, especially given the load-bearing limitations of the flood embankment where an area of open mosaic is being proposed. Off-site open mosaic creation is required and it needs to be as close as possible to the Thames foreshore to provide continued breeding habitat for Ringed and Little Ringed Plover: species that will be displaced as a result of the Data Centres.

There isn't the scope to create open mosaic habitat on Crossness Nature Reserve as it would result in altering one ecologically-valuable habitat - grazing marsh – for another. Worthy of exploration, would be the potential to create open mosaic on the former Thamesview Golf Course (currently owned by Peabody Estates) or on the north section of Norman Road Field (formerly owned by Tilfen Land, now Peabody Estates). These suggestions were offered to Cory during a meeting that took place on 25th April.

As discussed at said meeting, there isn't much scope for habitat creation on Crossness Nature Reserve/Southern Marsh beyond wetland creation on Parsley Field.

This ends the Written Statement and objection to the proposal of the Friends of Crossness Nature Reserve

Ralph Todd
(on behalf of the Friends of Crossness Nature Reserve)
18th May 2019

References

Bio-solar Green Roofs – <http://livingroofs.org> www.greeninfrastructureconsultancy.com

A Green roof solar boost – and a boost for nature too <https://livingroofs.org/introduction-types-green-roof/biosolar-green-roofs-solar-green-roofs/>

Bat Conservation Trust (2014) BCT Interim Guidance – Artificial Lighting and Wildlife

Bat Conservation Trust/Institute of Lighting Professionals (2018) Bats and artificial lighting in the UK – Bats and the built environment series. Guidance Note 08/18