

RIVERSIDE ENERGY PARK DCO

LB Bexley Local Impact Report

20 May 2019



LONDON BOROUGH OF
BEXLEY

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1 INTRODUCTION

- 1.1 Cory Environmental Holdings Limited is seeking Development Consent under the Planning Act 2008 from the Secretary of State for Energy for a Riverside Energy Park situated adjoining the existing Riverside Resource Recovery Facility (RRRF) on land at Norman Road, Belvedere, Bexley.
- 1.2 LB Bexley is the local planning authority within which the main part of the project is situated, and this document is its Local Impact Report to the Planning Inspectorate on this Nationally Significant Infrastructure Project.

Format

- 1.3 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:
- Planning Policy: Waste
 - Socio-economics
 - Air Quality
 - Biodiversity
 - Historic Environment
 - Transport
 - Ground Conditions
 - Townscape and Visual
 - Noise and Vibration
 - Flood Risk and Water Resources
- 1.4 Each section is presented in a similar format comprising 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
- 1.5 This Local Impact Report and the Written Representation are accompanied by a tracked-change draft of the application version of the DCO, where the changes represent those that would address the concerns raised by the Council.
- 1.6 A summary of this report is also provided in accordance with the Infrastructure Planning (Examination Procedure) Rules.

2 SUMMARY

- 2.1 The report sets out the planning history that is relevant to the site and the proposed development.
- 2.2 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
 - Saved Unitary Development Plan Policies
 - Bexley Core Strategy February 2012
 - Policy Appraisal
 - Other Relevant Local Policy and Guidance
- 2.3 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.

Planning Policy: Waste

Positive impacts

- 2.4 The following positive impacts have been identified:
- Capacity for the management of wastes that will lead to its diversion from landfill to thermal treatment and composting in accordance with the waste hierarchy.
 - The use of compost material as a fertilizer and avoiding this material being burnt in the EfW plant or sent to landfill will ensure compliance of these proposals with the waste hierarchy.
 - The proposals will generate renewable energy from the photovoltaic panels, AD and EfW plants.
 - The proposals have the potential to generate heat via CHP.
 - The proposals indicate the potential for the delivery of waste by river, which will remove waste vehicles from the road, but this needs to be secured.
 - Employment opportunities will result during the construction and operational phases of the development.

Negative impacts

- 2.5 No negative impacts have been identified.

Neutral impacts

- 2.6 The following neutral impacts have been identified:
- The EfW plant is not necessary to meet local need.
 - The applicant provides an assessment of wider need based on 655,000 tpa.
 - The Inspector will need to be satisfied as to the need for and thus capacity of any consented development.

Outstanding information

- 2.7 More information is needed about how the development will meet the GLA's Carbon Intensity Floor requirements.

Socio-economics

Positive impacts

- 2.8 The following positive impacts have been identified:

- Net additional jobs (470) generated in the construction and development phase of the project, 115 of which will be in the local area, 148 in the wider area, and 206 in the wider region.
- Net additional jobs (198) generated in the operational phase, relating both to the direct operation of the site and supply chain impacts. Based on assumptions utilised, 49 of these will be in the local area with a further 61 in the wider area and 88 in the wide region.

2.9 Some further clarification of these numbers is however sought from the Applicant given the GVA estimates of £7.2 million are based on 39 additional employees as opposed to 49.

Negative impacts

2.10 There may be transportation issues generated within the region, linking to congestion and associated economic impacts caused.

Neutral impacts

2.11 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.

Air Quality

2.12 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

2.13 No positive impacts have been identified.

Negative impacts

2.14 The following negative impacts have been identified:

- The application has not fully considered the potential for combined impacts due to emissions from the existing RRRF and proposed REP by including both sources in the air quality model.
- The study results for dioxins and furans, nickel, arsenic and short-term nitrogen dioxide and sulphur dioxide levels have been under-reported in the ES.

Neutral impacts

2.15 No neutral impacts have been identified.

Outstanding information

2.16 Further information required on:

- The potential for combined impacts due to emissions from the existing RRRF and proposed REP.
- The assessment of the proposed stack height.

Biodiversity

Positive impacts

2.17 The following positive impacts have been identified:

- The Applicant is entering into an agreement with the Environment Bank to provide off-site compensation to achieve biodiversity net gain.

- The Applicant is in discussion with the Crossness LNR Warden over possible ecological enhancements close to or within the proposed development site and Reserve.
- Surface water run-off from the REP site will be managed in a sustainable manner and deliver 'betterment' of water quality.

Negative impacts

2.18 The following negative impacts have been identified:

- Significant residual ecological effects have been identified to reptiles of Local conservation importance because of construction impacts of the Electrical Connection Route to a site at Joyce Green Quarry which was used as a receptor site for reptiles translocated from another development.
- The Electrical Connection route through Crossness Nature Reserve has a significant negative impact to biodiversity, but the applicant is expected to confirm that this route will not be chosen.
- Disturbance of locally-significant birds that use the Crossness Nature Reserve and surrounding habitat during the proposed scheme's construction phase.
- The total loss of the open-mosaic habitat area in the centre of the proposed REP site that was created as requirement of the RRRF development and there are doubts about the effectiveness of the compensation measure.
- The residual effects of the proposed AD emissions during operation are limited to the immediate vicinity of the REP site and could result in changes to the habitats through an increase in dominant grass species with a subsequent reduction in broadleaved herbaceous species.

Neutral impacts

2.19 Neutral impacts will be entirely dependent on the successful implementation of mitigation and local compensation as outlined in the Applicant's OBLMS.

Historic Environment

Positive impacts

2.20 No positive impacts have been identified.

Negative impacts

2.21 The following negative impacts have been identified:

- Lesnes Abbey (Scheduled Monument, and Grade II Listed Building) – assessed as receiving a minor adverse effect.
- 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, Locally Listed Building) – assessed as receiving a negligible-minor adverse effect.

2.22 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

2.23 No neutral impacts have been identified.

Transport

Positive impacts

- 2.24 The proposed development has the potential to transport waste by river to the facility which would reduce development generated traffic demand on the road network.

Negative impacts

- 2.25 The following negative impacts have been identified:
- Impact of construction traffic on the local network.
 - Impact of the electrical connection works.
 - The cumulative impacts of the REP construction and electrical connection have not been assessed.
 - Daily traffic movements during the operational period, especially Medium Goods Vehicles, will have an impact on the road network.
 - Localised impact on Norman Road on pedestrians, cyclists and public transport users travelling to and from these nearby developments.
 - The lack of right turning provision at the access junction leads to additional distances being travelled along Picardy Manorway and the undertaking of U-turns at the adjacent roundabouts which would be a negative impact.
 - Poor management of deliveries may lead to backing up of traffic onto Norman Road.

Neutral impacts

- 2.26 No neutral impacts have been identified.

Ground Conditions

Positive impacts

- 2.27 No positive impacts have been identified.

Negative impacts

- 2.28 No negative impacts have been identified.

Neutral impacts

- 2.29 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. The conditions under the planning consent for the data centre on the construction compound site will deal any land contamination present.

Townscape and Visual

Positive impacts

- 2.30 The following positive impacts have been identified:
- Long term effects on character and visual amenity resulting from the creation of a new building and focal point of skyline interest in a location currently defined by car parking, waste ground, scrubland, roads, and sheds.
 - This positive change will be experienced by people walking on the Thames Path National Trail and on Public Rights of Way in the area.

Negative impacts

- 2.31 The following negative impacts have been identified:
- Temporary during the construction period.
 - Loss of landscape character experienced by walkers on the Thames Path to the east 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 due to the large scale of the buildings as seen from this location.

Neutral impacts

- 2.32 A number of neutral (or negligible) impacts have been reported in the Environmental Statement during operation – these neutral impacts tend to be on mid-distance views (such as the edge of the Crossness Conservation Area, Lesnes Abbey and the London Loop along Ferry Lane) where the proposed development will be in keeping with the existing industrial elements of the view.

Noise and Vibration

Positive impacts

- 2.33 No positive impacts have been identified.

Negative impacts

- 2.34 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

- 2.35 The noise and vibration assessment of the proposals has concluded that the overall impact on the local area would be neutral. This would be achieved through effective mitigation measures employed during the design of the plant and during the construction process.

Flood Risk and Water Resources

Positive impacts

- 2.36 The following positive impacts have been identified:
- Remediation work to the assets that form the northern perimeter of the site would serve as a positive impact to the flood risk resilience of the immediate area.
 - Consideration of the requirements for the potential future works/maintenance to raise the tidal flood defence crest levels should be taken into account.
 - The drainage plan is currently in an indicative form, but the surface water strategy indicates that this has been undertaken to a greenfield rate of 35.3l/s which is a recognised betterment.

Negative impacts

- 2.37 The following negative impacts have been identified:

- Crossness Nature Reserve is an important habitat for flora and fauna and there are concerns for this wetland from the construction and operational phase of the proposed development.
- Contaminated discharge from construction activities or roads on the site could have a negative impact to the water quality of the marsh dyke system and the fauna that depends on it.

Neutral impacts

2.38 The following neutral impacts have been identified:

- The Applicant has not identified any neutral impacts in the ES however, potential negative impacts may be neutralised by mitigation.
- Foul waste water generated from the welfare facilities is expected to undergo treatment via a packaged wastewater treatment plant and after final settlement discharged to the underlying groundwater and is therefore not likely to impact the underlying Thames groundwater body.
- The outline drainage strategy indicates that runoff from the vehicle routes and circulation areas shall pass through full retention separators, therefore undergoing treatment and thereby removing pollutants. This needs to be secured in the DCO.
- The proposals are compliant with the Water Framework Directive (WFD) and therefore the proposed development should not cause deterioration of water bodies within vicinity of the site, nor compromise their objectives.

3 PLANNING HISTORY

- 3.1 **2018 (2018/01743/SCREEN)** Statutory consultation on a proposed application for development consent Section 42 Planning Act 2008 (and Regulation 13 of the Infrastructure Planning (EIA) Regulations 2017). **Observation sent.**
- 3.2 **2017 (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**
- 3.3 **2016 (16/02167/FUL) p.p. subject to S106** for Proposal under Section 73 of TCPA 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.
- 3.4 **2015 (15/02926/OUTM) outline p.p.** for 15/02926/OUTM for the construction of a data centre (Use Class B8), sub-stations, formation of new access, car parking and landscaping on land forming part of Borax Works Norman Road Belvedere Kent.
- 3.5 **2014 (14/02357/LDCP) Certificate of Lawful Development granted** for the modification of a section of external cladding on the eastern elevation of the main facility building.
- 3.6 **2014 (99/02388/CIRC24) – application made October 2014 (reference relates to original consent)** 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 (tpa) to 785,000 tpa 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.**
- 3.7 **2011 (11/01387/FUL) p.p. for** proposal under Section 73 of the TCPA 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.
- 3.8 **2011 (11/00083/GPDOPD) Planning permission not required for** the construction of a new 11kv micro substation.
- 3.9 **2009 (09/00612/FUL) p.p. for** proposal under Section 73 of TCPA 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.
- 3.10 **2008 (08/03256/FUL) p.p. for** widening of Norman Road, realignment of existing ditch and ecological enhancements.
- 3.11 **2007 (07/11615/FULMIN) p.p. for** 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.

- 3.12 **2007 (07/11615/FUL) p.p. for** 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.

4 PLANNING POLICY: WASTE

Policies

London Borough of Bexley Policies

- 4.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 Unitary Development Plan (UDP) and the relevant policies presented in the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 4.2 Almost all of the UDP policies relating to waste have been allowed to expire by the Secretary of State's Direction or have been superseded by the Bexley Core Strategy. UDP policies that have been saved, which pertain to the proposed development, include Policy E1, which sets out criteria for proposals for development for industrial and commercial uses, including waste and Policy E3 with the site designated as a primary employment site. The full policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 4.3 A number of the Core Strategy Spatial Objectives are of relevance to the proposed development, these include: Number 1 related to climate change and increased use of renewable energy; Number 4 associated with minimising waste, managing waste through increased recycling and reuse, recovery of waste without harm to humans or the environment and disposing of waste close to where it is produced; and Number 8 promoting sustainable forms of transport.
- 4.4 Policy CS01 relates to achieving sustainable development. Point b of Policy CS01 refers to maximising the efficient use of natural and physical resources. Policy CS03 covers achieving sustainable development for the Belvedere geographic region. Point c of Policy CS03 refers to supporting all forms of sustainable transport including the safeguarded wharf at the Riverside site. Point g of Policy CS03 refers to supporting investigations into decentralised heat networks, with reference made in paragraph 3.6.10 of the Core Strategy to using heat in the local area from the Riverside Resource Recovery Facility (RRRF) Energy from Waste (EfW) plant via a high pressure heat main.
- 4.5 Policy CS08 relates to mitigating impacts of climate change, reducing carbon emissions, use of on-site renewables and development of Combined Heat and Power (CHP) and district heating opportunities. Policy CS09 relates to the sustainable use of resources including reference to encouraging the use of the River Thames to carry freight and materials.
- 4.6 Policy CS15 promotes the sustainable transport of freight and protection and development of safeguarded wharves. Policy CS20 relates to sustainable waste management and ensuring that wastes are managed to protect the environment and human health and new developments will follow the principles of the waste hierarchy. Reference is also made to meeting the apportionment targets set for the Borough in the London Plan. The full policy descriptions are included in Appendix 2 to this representation.

Policy Appraisal

- 4.7 Saved UDP Policy E1 seeks to encourage a good quality environment that will encourage new investment to the area, whilst the application site itself is identified as a primary employment site (Policy E3). The site currently accommodates an EfW facility with a further consented incineration facility located at the adjacent Crossness

- Sewage Treatment Works site. A further waste facility at the Belvedere site would provide waste co-location benefits and some employment opportunities.
- 4.8 The efficient use of resources is promoted by Core Strategy Policies CS01 and CS09. These proposals seek to make use of waste as a resource and to further develop an existing waste site with waste uses and are therefore considered to be in accordance with these policy objectives. The use of the existing jetty is also considered an existing resource and maximising this use is required in order to comply with these policy objectives.
- 4.9 Core Strategy Policy CS09, as well as Policy CS15 and Core Strategy Spatial Objective 8, refer to encouraging the use of river transport. The proposed development does provide the opportunity for waste materials to be brought to and from the site by river. Maximising the use of the river to transport materials to and from the site is sought through Requirements and such an approach would satisfy these policy objectives.
- 4.10 Core Strategy Policies CS03 and CS08 as well as Core Strategy Spatial Objective 1 include reference to renewable energy and development of CHP and decentralised heat networks, although it is noted that the draft London Plan with minor changes (2018) has deleted reference in paragraph 9.3.7 to the use of EfW as a heat source in discussing Heat Network Priority Areas. These proposals will provide for on-site provision of renewable energy in accordance with Policy CS08. The EfW facility is proposed as being developed as CHP ready and when operating in this mode would achieve the carbon intensity floor requirements set out in the London Plan. The difficulty in delivery the export of heat from EfW plants is recognised with heat export still to be realised by the existing RRRF EfW plant. The provision of heat studies and reporting is currently suggested by the Applicant [as part of its application] to help meet the objectives set out in Policies CS03 and CS08.
- 4.11 Core Strategy Policy CS20 and Core Strategy Spatial Objective 4 relate to sustainable waste management, seeking conformity with the proximity principle and the waste hierarchy as well as meeting the waste apportionment targets set for the Borough in the London Plan. In accordance with the waste hierarchy the compost material (digestate) produced from the Anaerobic Digestion (AD) plant should be exported off-site for use as a fertiliser as opposed to being burnt in the EfW facility in order to satisfy waste hierarchy policy objectives.
- 4.12 The need case for a development of an EfW plant with a capacity of 805,920 tpa located on the Riverside site is not included within the London Waste Strategy Assessment (Annex A of the Project Benefits Report (PINS reference APP-103)) undertaken by the Applicant. This assessment considers a need for an EfW plant based on 655,000 tpa capacity as summarised in Table 6.1 of this London Waste Strategy Assessment report. The Inspector will need to be satisfied as to the need for and thus capacity of any consented development.

Other Relevant Local Policy and Guidance

- 4.13 Bexley has an adopted Municipal Waste Management Strategy (2009 – 2014). In order to meet declared policies and objectives and to address the demands made by statutory and other drivers, the Council is committed to the following objectives:
- Reduce waste growth;
 - Raise awareness of waste issues and the importance of waste reduction in order to slow the future growth in waste arisings;
 - Sustainable waste management: By using the waste hierarchy as a sensible framework to ensure that all waste arisings in Bexley's area are dealt with in the best practicable and environmentally friendly way;

- Divert waste from landfill: Aim to meet biodegradable waste diversion targets, by focusing on increasing recycling and composting and introducing new treatment technologies; and
 - Meet recycling targets: Increase as far as is practicably possible and economically viable the amount of waste that is recycled and composted in Bexley.
- 4.14 Bexley adopted an Environmental Sustainability Strategy in 2011. It addresses environmental sustainability across a number of themes including: adaptation to and mitigation of climate change; energy management, including carbon reduction; sustainable transport; and waste minimisation and management.
- 4.15 With regard to waste apportionment, the South East London Borough's, including Bexley, jointly prepare and update a South East London joint waste technical paper each time a local plan is being prepared. The paper demonstrates how the South East London Borough's will jointly meet the waste apportionment targets prescribed in the London Plan and identifies safeguarded wastes sites that will help meet these targets. The latest update of the paper was prepared to support Southwark Local Plan and published on Southwark's website as a submission draft in December 2017. This report identifies a surplus of waste capacity from operational waste management facilities through to 2036. Table 9.2 of the draft London Plan with minor changes (2018) sets waste apportionment targets for the LBB, which suggest no requirement for additional EfW capacity in the Borough. Furthermore, in paragraph 9.7.3A of the draft London Plan with minor changes (2018) it states that there is sufficient EfW capacity in London to manage London's non-recyclable municipal waste. The accordence of the proposals with these policy elements is uncertain.
- 4.16 Policy descriptions from the London Plan are included in Appendix 3 to this representation.

Local Impacts

Positive impacts

- 4.17 The proposals will provide capacity for the management of wastes that will lead to the diversion of some wastes from landfill to thermal treatment and composting of wastes through AD in accordance with the waste hierarchy. The use of compost material as a fertilizer and avoiding this material being burnt in the EfW plant or sent to landfill will ensure compliance of these proposals with the waste hierarchy. The proposals will generate renewable energy from the photovoltaic panels, AD and EfW plants, which is in accordance with national, regional and local policy objectives.
- 4.18 The proposals have the potential to generate heat and if operated in CHP mode it is understood that this would then enable the proposed development to achieve the Carbon Intensity Floor requirements set out in the London Plan.
- 4.19 The proposals indicate the potential for the delivery of waste by river, which will remove waste vehicles from the road. Further details and commitments are sought from the Applicant through Requirements to ensure that river transport is maximised during the operational phases of the development.
- 4.20 Employment opportunities will result during the construction and operational phases of the development. The LBB consider the investment/job opportunities to be a significant positive benefit of the proposed development.

Negative impacts

- 4.21 There are no negative impacts to note.

Neutral impacts

- 4.22 With regard to waste apportionment the South East London joint waste technical paper identifies a surplus of waste capacity in South East London from operational waste management facilities through to 2036 and Table 9.2 of the draft London Plan with minor changes (2018), which sets waste apportionment targets for the LBB, suggests no requirement for additional EfW capacity in the Borough. Furthermore, in paragraph 9.7.3A of the draft London Plan with minor changes (2018) it states that there is sufficient EfW capacity in London to manage London's non-recyclable municipal waste.
- 4.23 The Applicant has clarified in correspondence with LBB that the proposed capacity of the EfW plant is some 805,920 tpa and not 655,000 tpa. The latter figure is the expected annual throughput of the plant given normal maintenance downtime and other production impediments. It is noted that the London Waste Strategy Assessment (Annex A of the Project Benefits Report (PINS reference APP-103)) undertaken by the Applicant provides an assessment of need based on 655,000 tpa as summarised in Table 6.1 of this London Waste Strategy Assessment report.
- 4.24 The Inspector will need to be satisfied as to the need for and thus capacity of any consented development.

Outstanding information

- 4.25 It is understood that updates to the CHP report are being undertaken by the Applicant and this will include details of how the development will meet the GLA's Carbon Intensity Floor requirements. Further details on such updates are sought from the Applicant.

5 SOCIO-ECONOMICS

Policies

London Borough of Bexley Policies

- 5.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant policies presented in the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 5.2 Saved UDP Policy G1 states that the Council will seek to protect, maintain and improve the quality of the built natural environment for the economic and social well-being of the borough whilst making efficient and effective use of the boroughs land resources. In particular, proposals for development which would detract from the overall environmental quality of an area will not be acceptable.
- 5.3 Saved UDP Policy G4 states that the Council will, within available resources, seek to provide adequate means and opportunities for all sections of the boroughs population to have access to housing, jobs, leisure and social and community facilities.
- 5.4 Saved UDP Policy G32 states that proposals for waste management developments will be considered within the context of national sustainable development principles of best practicable environmental option, the waste hierarchy and the proximity principle.
- 5.5 Saved UDP Policy E13 states that proposals for waste incineration and waste to energy plants will only be permitted where they form part of the Mayor of London's Municipal Waste Management Strategy and Spatial Development Strategy.
- 5.6 Section 3.19 of the UDP states that emphasis of local economic development policy in this Plan is on retaining employment, sustaining the local economy and the provision of additional, good quality local job opportunities, which provide an attractive alternative to longer distance commuting.
- 5.7 The full policy descriptions are included in Appendix 1 of this representation.

Bexley Core Strategy February 2012

- 5.8 Core Strategy Policy CS01 sets out requirements regarding sustainable development and investment in infrastructure that protect and improve the natural environment, minimising impacts of pollution (air and surface and ground water) and contaminated lands. The Bexley Core Strategy also sets out policies to ensure Bexley's position as a key contributor to London's economic growth and prosperity (Policy CS03 and CS12). As such the Council can be seen to support the development of opportunities that generate economic opportunities as long as they meet sustainable development criteria and meet the ambition of the Mayor of London's Municipal Waste Management Strategy. The full policy descriptions are included in Appendix 2 of this representation.

Policy Appraisal

- 5.9 The development proposals are considered compliant with the UDP and Core Strategy from a waste economics perspective.

Other Relevant Local Policy and Guidance

- 5.10 The following strategy and planning documents are also considered relevant to the waste economics assessment of this proposed development.

- 5.11 Section 2.1 of the Bexley Growth Strategy December 2017 outlines the council's ambition for economic development with key themes of:
- Use growth to secure economic development;
 - Create a broader, more resilient and higher quality economic base;
 - Make Bexley a thriving and ambitious place of opportunity through education and employment; and
 - Enhance Bexley's image.
- 5.12 The policy description related to Section 2.1 are included in Appendix 3 of this representation.

Local Impacts

- 5.13 As a large-scale infrastructure development project, the proposed development is likely to result in employment benefits during both the construction phase as well as during operations. This should be considered as an opportunity from the site maximising the internalisation of these jobs to deliver the highest added value for the LBB as well as the wider region and Greater London.

Positive impacts

- 5.14 Based on the economic assessment made within the Applicant's Environmental Statement there are a range of employment based positive impacts from the proposed development:
- Net additional jobs (470) generated in the construction and development phase of the project, 115 of which will be in the local area, 148 in the wider area, and 206 in the wider region.
 - Net additional jobs (198) generated in the operational phase, relating both to the direct operation of the site and supply chain impacts. Based on assumptions utilised, 49 of these will be in the local area with a further 61 in the wider area and 88 in the wide region.
 - Some further clarification of these numbers is however sought from the Applicant given the GVA estimates of £7.2 million are based on 39 additional employees as opposed to 49.

Negative impacts

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

Neutral impacts

- 5.16 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.

6 AIR QUALITY

Policies

London Borough of Bexley Policies

- 6.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant policies presented in the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 6.2 Saved UDP Policy ENV41 requires an air quality assessment to be produced for relevant development proposals. It envisages the use of conditions to avoid adverse effects on air quality in the Borough. The full policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 6.3 Core Strategy Policy CS01 confirms that air quality will be addressed to ensure that sustainable development contributes to the health and well-being of the community and the environment.
- 6.4 Core Strategy Policy CS09 confirms that sustainable use of Bexley's resources will be encouraged. This includes maximising the opportunities to improve the health of the environment, including air quality, and reducing pollution and conflicts between adjoining land uses.
- 6.5 The full policy descriptions are included in Appendix 2 to this representation.

Policy Appraisal

- 6.6 The application complies with the policy requirement for an air quality assessment to be carried out. As set out under Local Impacts below, some potentially significant effects on air quality have been identified due to the proposed development, as well as some lack of information which means that the significance of potential effects on air quality cannot be fully evaluated. As a result, further information in relation to combined impacts and stack height should be provided by the Applicant. While control of emissions and potential impacts from the proposed development will be principally a matter for the Environment Agency, it may be appropriate to include DCO requirements in order to ensure that conflicts and adverse effects on air quality in the Borough are avoided, in accordance with Core Strategy Policy CS09 and Saved UDP Policy ENV41.

Other Relevant Policy and Guidance

- 6.7 National air quality standards are specified in the Air Quality Standards Regulations (2010 No. 1001). Air quality guidelines for a range of other pollutants are specified by the Environment Agency. The proposed development should be assessed against these standards and guidelines. The Habitats Regulations require decision-making bodies to carry out an assessment of potential air quality impacts on nature conservation sites designated at a European level.
- 6.8 Emissions from the proposed EfW facility will be regulated under the Environmental Permitting (England and Wales) (Amendment) Regulations 2013, reflecting European standards.
- 6.9 National Policy Statement EN-1 requires potential impacts of new infrastructure on health and the natural environment to be assessed, and an appropriate stack height to be identified.

- 6.10 The National Planning Policy Framework (NPPF) states that “Planning ... decisions should contribute to and enhance the natural and local environment by ... preventing new ... development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of ... air ... pollution...” It confirms that the assessment of air quality impacts should take account of potential impacts on Air Quality Management Areas and Clean Air Zones, and to consider cumulative impacts.
- 6.11 The London Plan 2016 Policy 5.7 requires renewable energy systems to be located and designed to minimise any potential adverse impacts on air quality. London Plan 2016 Policy 7.14 further requires local authorities to avoid adverse air quality effects, and where possible, to improve air quality.
- 6.12 The Draft London Plan 2018 Policy S11 confirms that new development should not lead to further deterioration of existing poor air quality, delay achieving air quality standards, reduce air quality benefits from other initiatives, or create unacceptable risk due to poor air quality. The policy description related to the London Plan are included in Appendix 3 to this representation.

Local Impacts

- 6.13 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.

Positive impacts

- 6.14 No positive impacts on local air quality arising from the proposed development are expected to occur.

Negative impacts

- 6.15 LBB remains concerned in relation to the negative impacts of the proposed development in relation to the following aspects of the application:
- The application has not fully considered the potential for combined impacts due to emissions from the existing RRRF and proposed REP by including both sources in the air quality model.
 - The study results for dioxins and furans, nickel, arsenic and short-term nitrogen dioxide and sulphur dioxide levels have been under-reported in the ES.

Neutral impacts

- 6.16 No neutral impacts have been identified.

Outstanding information

- 6.17 LBB requests further information on combined impacts due to emissions from the existing RRRF and proposed REP (including both the EfW and AD plants), by including all these three sources in the air quality model.
- 6.18 LBB is concerned over the proposed stack height and requires further details from the Applicant related to this assessment.

7 BIODIVERSITY

Policies

London Borough of Bexley Policies

- 7.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant policies presented in the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 7.2 The Saved UDP policies of relevance to biodiversity issues associated with the proposed development include policies that protect Local Nature Reserves (LNR) (Policy ENV28), Sites of Special Scientific Interest (SSSI) (ENV32 and ENV33), trees of amenity, nature or landscape conservation value (ENV35) and wildlife of the river and habitats on Thames-side, including adjacent minor watercourses (TS15). The full policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 7.3 Core Strategy Policy CS18 seeks to ensure development does not adversely affect any European site, SSSI and Sites of Importance for Nature Conservation (SINC) and resists development that will have a significant impact on protected species and priority species identified in the UK, London and Bexley Biodiversity Action Plans (BAPs). It also aims to protect and enhance natural habitat as far as practicable, seeking enhancements through new development, with preference given to delivering London Plan and Bexley BAP targets. It also seeks opportunities to provide for greening of the built environment, including green roofs and walls in new buildings. The full policy description is included in Appendix 2 to this representation.

Policy Appraisal

- 7.4 The local policies of greatest relevance to biodiversity issues arising from the proposed scheme are those pertaining to protected sites (LNR and SINC) and protected and priority species: notably water voles and reptiles and potentially great crested newts, bats and birds. Core Strategy Policy CS18 is also highly relevant to this proposed development in terms of the opportunity for delivering Bexley BAP targets and green buildings. Currently, the proposed development does not comply with ENV28 in relation to the LNR and CS18 in relation to protected sites (SINC) and protected species (reptiles) as described in Section 5.2.2 below.

Other Relevant Local Policy and Guidance

- 7.5 London Plan (2016) Policy 7.19 and Policy G6 of the London Plan (2018) give strong protection to Sites of Metropolitan Importance for nature conservation (SMIs), which have strategic nature conservation importance. The Crossness Nature Reserve is an SMI. The policy description from the London Plan are included in Appendix 3 to this representation.
- 7.6 The Bexley BAP 2010-2015 (adopted 2011) provides targets for local biodiversity conservation action. Bexley have not done any recent work on updating the BAP and have no current plans to update it; however, the targets are still considered relevant. The local BAP contains action plans for the following local biodiversity priorities:
- **Bats**
 - Black poplar
 - **Grazing marsh**
 - **Great crested newt**

- Heathland
- Parks and open spaces
- Ponds
- Reedbeds
- **Rivers & streams**
- Stag beetle
- **Water vole**
- Woodland

- 7.7 Those shown in bold text above are the most relevant to the application site and its likely impacts. Very few of the BAP actions specifically relate to development control, but development in this area has the opportunity to contribute to the BAP's targets, the most relevant of which relate to provision of bat boxes, protection and enhancement of grazing marsh, and protection of ditches especially where water voles are present in the area.
- 7.8 The Negatives impact section below raises questions as to whether the proposed development is in accordance with these other guidance documents.

Local Impacts

Positive impacts

- 7.9 The Applicant is entering into an agreement with the Environment Bank to provide off-site compensation to achieve biodiversity net gain, further information on which are provided in the Outline Biodiversity and Landscape Management Strategy (OBLMS) (Document Reference 7.6). However, important details of this compensation and the associated biodiversity metric that should demonstrate a net gain for biodiversity are yet to be provided. It is understood that the location of such compensation measures will be within the LBB, which is welcomed. A specific site or sites have yet to be identified and confirmed. Compensation proposals should be developed through collaborative working with LBB, local groups and land owners; including members of the Crossness Nature Reserve management committee.
- 7.10 It is also understood that the Applicant is in discussion with the Crossness LNR Warden over possible ecological enhancements close to or within the proposed development site and Reserve. Any such locally-informed enhancements that go beyond mitigation and help to achieve net gain, particularly for those features listed in Section 5.1.2 above, would provide positive impacts. Further details on any such benefits are sought from the Applicant.
- 7.11 Given the importance of the surrounding ditch network to grazing marsh habitat and associated wetland wildlife, it is welcomed that surface water run-off from the REP site will be managed in a sustainable manner and deliver 'betterment' of water quality when reviewed within the context of the existing (predevelopment) surface water run-off regime.

Negative impacts

- 7.12 Significant residual ecological effects have been identified, by the Applicant, to reptiles of Local conservation importance. This results from construction impacts of the Electrical Connection Route to a site at Joyce Green Quarry which was used as a receptor site for reptiles translocated from another development. This reptile receptor site sits within the southern section of the Electrical Connection construction corridor. Being a receptor site that contains reptiles that have already been previously displaced, the proposed scheme's negative effect also potentially undermines the basis on which that other development was previously consented and conditioned in respect to biodiversity.

- 7.13 There is a particularly important population of water voles in the area, and the Crossness Nature Reserve holds a significant population. The ditch network linked to the remaining parts of the Erith Marshes and Crossness provides an important habitat for one of the few remaining colonies of water vole in this part of London. One of the proposed Electrical Connection routes is through the Crossness Nature Reserve and would require trapping and later reintroduction of water voles back onto the site. Whilst this must be done under licence by experienced staff, it is invasive and uncertain in outcome. It therefore brings significant residual risks to fragile populations of water voles reliant on relatively scarce patches of suitable habitat and connectivity between them. This population vulnerability is exacerbated by the recent discovery of American mink, an invasive predator of water voles, in the Reserve. Therefore, the selection of an Electrical Connection route outside of the reserve (e.g. Norman Road), and without the need to damage water vole burrows/habitat, is strongly advised.
- 7.14 It is likely that a locally-significant number of notable birds that use the Crossness Nature Reserve and surrounding habitat will be disturbed during the proposed scheme's construction phase. The best habitat in the reserve is stated to be at the back of the West Paddock, which is adjacent to the south side of the proposed scheme. The numerous shallow pools in this location, together with areas of tussocky vegetation alongside grazed areas, create ideal conditions for roosting and foraging wildfowl and breeding waders. Other species that breed within or next to the proposed development site are also at risk of noise and visual disturbance, notably the specially-protected (Wildlife & Countryside Act Schedule 1) Cetti's warbler and barn owl. Whilst some form of site screening has been suggested as mitigation for this, there is, as yet, no detail of its form, location or proven level of effectiveness.
- 7.15 It is understood that the proposed development will lead to the total loss of the open-mosaic habitat area in the centre of the proposed REP site that was created as requirement of the RRRF development. It is not clear yet how far the proposed habitat creation on the flood embankment will compensate for this loss. It is also not clear how acceptable this will be to flood defence interests, and associated maintenance requirements. Therefore, more information is requested on the feasibility, sustainability and effectiveness of this compensation measure. Furthermore, the loss of this RRRF-mitigating habitat potentially undermines the basis on which the RRRF development was previously consented and conditioned in respect to biodiversity.
- 7.16 The Applicant's Environmental Statement indicates that the residual effects of the proposed AD emissions during operation are limited to the immediate vicinity of the REP site. This includes a small area of the Crossness LNR and Erith Marshes SINC/SMI which is predicted to have hourly mean NO₂ concentrations above 10% of the assessment level. This could result in changes to the habitats through an increase in dominant grass species with a subsequent reduction in broadleaved herbaceous species. Whilst the current flora of these areas of the designated site are described as being less diverse, further enrichment of soils by emissions prevents them realising a greater floristic and invertebrate diversity in future. Also, dittander, which is a rare plant in a London context, is reported by the Nature Reserve Warden as present particularly around the Cory Fields, and a rare sedum (Spanish stonecrop) on the footpath to the east of the REP. These residual impacts to important habitat and flora could be exacerbated by the in-combination effect of the proposed scheme with the Land at the Eastern Thamesmead Industrial Estate Extension (10/00063/OUTEA) which is also likely to result in loss and disturbance of habitats within Erith Marshes SINC.

Neutral impacts

- 7.17 The neutrality of the other ecological impacts to the local area will be entirely dependent on the implementation of successful mitigation and local compensation as outlined in the Applicant's OBLMS (Document 7.6). Key to the success of this

mitigation will be the detail of design, location, implementation and monitoring which are yet to be provided by the final Biodiversity and Landscape Management Strategy (BLMS). In particular, details of the biodiversity off-sets and associated metric and off-set value are awaited in order to confirm neutrality of impacts, as well as the potential positive impacts discussed in Section 5.2.1 above. This need for detail to prove neutrality also applies to mitigating light-spill disturbance impacts for nocturnal species (e.g. barn owl, bats, invertebrates).

8 HISTORIC ENVIRONMENT

Policies

London Borough of Bexley Policies

- 8.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant policies presented in the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 8.2 Saved policies ENV46 and ENV47 relate to the Conservation Areas¹ and aim to preserve or enhance the character or appearance of the area in order to promote a high standard of design and to oppose demolition or alteration of buildings that contribute to their character/ appearance.
- 8.3 Saved Policy ENV39 aims to protect and enhance the quality of the built environment by ensuring new development are of a high standard of design and compatible with the character of the surrounding area (with respect to scale, massing, height, layout, elevational treatment, materials and/or intensity of development).
- 8.4 Saved policy ENV51 aims to preserve listed buildings and their settings, through control of demolition, development within the curtilage of listed buildings or development that would 'detract from the setting' of a listed building.
- 8.5 The following historic environment-related saved UDP policies (2007) were wholly replaced by the Bexley Core Strategy (2012), specifically by Policy CS19 Heritage and archaeology:
- G26 Conservation of the built and natural environment
 - ENV53 – Listed Buildings
 - ENV56, 57 and 58 - Archaeology
 - TAL4 Enhancement of tourist attractions
- 8.6 The full policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 8.7 Core Strategy Policy CS19 Heritage and archaeology aims to ensure that Bexley's heritage assets, including buildings, sites and locations of architectural and archaeological interest, are preserved and enhanced and their contribution to the borough's identity is recognised, specifically by:
- a) promoting the borough's heritage assets, such as 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) conserving and enhancing the significance of heritage assets, their setting, and the wider historic environment, including statutorily listed buildings; locally listed buildings of architectural or historic interest, conservation areas, registered parks and gardens, and archaeological sites;
 - d) protecting heritage assets from development that is likely to adversely impact on the significance, integrity, character or appearance of an asset or its setting;
 - e) supporting historic restoration schemes through partnership working and seeking funding to enhance heritage and archaeological assets in an appropriate and sympathetic manner; and

¹ ENV46: development/alterations of buildings within CAs; ENV47: demolition within CAs

- f) 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.

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

Policy Appraisal

- 8.9 UDP saved policies ENV46 and ENV47 pertain to development within Conservation Areas and are not therefore directly applicable to the proposed development.
- 8.10 UDP policy ENV39, as far as it relates to the historic environment, states that development should be "...compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development". The proposed development, whilst 'tall' and of significant mass in general terms, can be held to be compatible with the character of the surrounding area. This is by virtue of its form, as an industrial building reflecting its function, and echoing the utilitarian architectural language of similar incinerator facilities in the vicinity. It can therefore be held to comply with this policy.
- 8.11 UDP policy ENV51 states that the Council will 'resist any proposals which detract from the setting of a listed building.' Based on the evidence provided in the Environmental Statement, while the proposed development is visible within the settings of a number of listed buildings, it is assessed as having, at worst, a minor effect² on the significance of Listed Buildings. The proposed development could therefore be held to be in conflict with the letter, if not the spirit, of the policy. Although the effect to the asset will not be significant for the purposes of EIA, it will give rise to a degree of harm to the significance of the asset as a consequence of setting change³, and can therefore be understood as 'detracting' from the setting of the asset.
- 8.12 Core Strategy Policy CS19 does not set specific tests for development, but instead states that the Council will protect heritage assets from development that is '*likely to adversely impact on the significance, integrity, character or appearance of an asset or its setting*'. Again, while no significant effects are identified, the proposed development nevertheless conflict with the letter of the policy.
- 8.13 The proposed development has a minor adverse impact, as a consequence of setting change, on the significance of Lesnes Abbey (Scheduled Monument and Grade II Listed Building – minor effect) , and a negligible-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. However, the effects to archaeological assets, and the mitigation specified, can be held to comply with part F of the policy – as 'appropriate levels of archaeological investigation' are proposed.

² Minor effect, by way of setting change, to Lesnes Abbey (Ruins of Lesnes Abbey, Grade II Listed [NHLE: 1359415] – also within a Scheduled Monument [NHLE: 1002025])

³ For the purposes of Overarching National Policy Statement for Energy (EN-1), paragraph 5.8.14 onwards

Other Relevant Local Policy and Guidance

- 8.14 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.
- 8.15 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.
- 8.16 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.
- 8.17 Policy details of the above guidance documents are included in Appendix 3 to this representation.

Local Impacts

Positive impacts

- 8.18 No positive impacts are identified as a consequence of the proposed development.
- 8.19 While a 'minor beneficial' effect to geoarchaeological deposits within the development foot print is identified in the Applicant's Environmental Statement, this conclusion is not agreed by the LBB and no 'real' benefit to the significance of heritage assets is considered to result from the proposed development.

Negative impacts

- 8.20 The key local historic environment issues pertain to the effects of setting change to:
- Lesnes Abbey (Scheduled Monument, and Grade II Listed Building) – assessed as receiving a minor adverse effect; and
 - 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, Locally-Listed Building) – assessed as receiving a negligible-minor adverse effect.
- 8.21 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. These effects result in conflict with UDP Policy ENV51 and Core Strategy Policy CS19. Neither policy's wording offers any opportunity for either qualifying/quantifying the change to significance, nor any scope for a balancing exercise on the part of the decision-maker.
- 8.22 The setting of Lesnes Abbey is already heavily developed, but it is accepted that the proposed development would introduce an additional tall, large-scale feature in longer views to the northeast. The introduction of the proposed development would, to some degree, affect the ability to understand the position and relationships of the asset (e.g. views to the Thames and rising ground on the north side of the river).

However, it would not fundamentally alter the heritage values from which the asset derives the vast majority of its significance.

- 8.23 Similarly, the effects to Crossness Conservation Area and in particular Crossness Pumping Station, hinges on change to the visual component of setting – principally views down and across the Thames from the asset. The visualisations prepared for the scheme (VP07) illustrate that the scheme will be highly prominent in combination with the asset in views from the riverside path. Nevertheless, the visual, spatial and functional relationship of the asset with the Thames will remain largely intact – particularly from the Pumping Station itself. While some harm will undoubtedly occur, this will be less than substantial for the purposes of the National Policy Statement for Energy⁴ - in that the core heritage values and key relationships that comprise its setting, and hence inform its significance, will remain unchanged. Views through/from within the Conservation Area of the pumping station group, with an undeveloped Thames-side backdrop, will still be available and are critical in understanding the functional and spatial relationships of the asset with the river. These are, however, heavily influenced and somewhat compromised by the extensive solar farm present on top of the covered reservoir to the rear (southeast) of the Crossness pumping station, which forms part of the Grade II-listed historic water and sewage management infrastructure.

Neutral impacts

- 8.24 No neutral impacts are identified.

⁴ Department of Energy and Climate Change (2011) *Overarching National Policy Statement for Energy (EN-1)*. Strictly, 'less than substantial harm' is not defined in the NPS – however this is taken to mirror the definitions applied for NPPF, where substantial harm

9 TRANSPORT

Policies

London Borough of Bexley Policies

- 9.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant transport policies are also presented from the 2012 Bexley Core Strategy.

Saved Unitary Development Plan (UDP) Policies

- 9.2 Saved Policy G23 relates to car parking and notes that the Council will seek to ensure that no more parking spaces are provided as part of a development than a Transport Assessment may justify.
- 9.3 Saved Policy T6 relates to the Council refusing development where traffic on a road increases above the design flow or increases traffic on a road already operating above the design flow unless measures can be implemented to address this. Saved Policy T14 sets out the need for cycle infrastructure and parking in developments.
- 9.4 Saved Policy T17 refers to development parking provision being under the maximum parking standards set out in Annex 1 of the UDP unless the Transport Assessment sets out the case for higher parking provision. For employment uses, this states that one car parking space per 100 to 400 sq. m. gross floor area (GFA) and one lorry space for every 250 sq. m. GFA except for the first 250 sq. m. Lorry parking spaces can be varied depending on the details of the development. Minimum cycle parking is also required at one space per 600 sq. m. GFA for industrial employment land uses. The full policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 9.5 Policy CS03 covers achieving sustainable development for the Belvedere geographic region. Point c refers to supporting all forms of sustainable transport. Policy CS15 focuses on achieving an integrated and sustainable transport system promoting sustainable modes of transport, controlling parking and reducing reliance on the private car.
- 9.6 Policy CS16 focuses on reducing the need to travel and the impact of travel and notes the importance of workplace Travel Plans. The relevant policy descriptions are included in Appendix 2 to this representation.

London Borough of Bexley Local Implementation Plan Adopted March 2019

- 9.7 This Adopted March 2019 document sets out strategies for improvements to the local transport network to meet the Mayor's Transport Strategy goals with trajectories for Bexley. These include increasing the total mode share for walking, cycling and public transport trips, a reduction in vehicle kilometres travelled, a reduction in CO₂, NO_x, PM₁₀ and PM_{2.5} emissions from road traffic and increased number of trips per day by public transport. The Plan also includes a requirement for Construction Management Plans and Delivery and Servicing Plans from major developments.

Policy Appraisal

- 9.8 The development proposals do not include high amounts of car parking and relate well to the modal split assumptions and operational staff numbers and so are considered to adhere to Saved Policy G23, Saved Policy T17 and Policy CS03.

- 9.9 The peak hour capacity assessments undertaken for the operational period show that the local highway network is forecast to operate within capacity and there will be an insignificant increase in traffic generated by the development. During some of the construction period, significant amounts of traffic are forecast from construction workers and it is assumed that these trips will be undertaken outside of the peak hours before 8am and after 6pm. A mechanism to secure these assumptions would be considered necessary and could be included as a DCO requirement. A total of 1,148 two-way daily vehicle trips are forecast during the busiest construction period, the majority of which will be staff car trips. A Construction Traffic Management Plan includes a Staff Travel Plan to reduce car trips. It is also understood more recently from discussions between the Applicant and TfL that the temporary worker car park will be reduced from 552 to 275 spaces. The successful implementation of this restriction on parking and the Staff Travel Plan would support conformity to Saved Policy T6 and Policy CS16.
- 9.10 The development proposals include 18 long stay and 10 short stay cycle parking spaces which is considered a good level of provision relative to operational staff numbers. There is some existing cycling infrastructure supporting cycle connectivity to the site and therefore the proposals are considered to adhere to Saved Policy T14, Saved Policy T17 and Policy CS15.
- 9.11 The Transport Assessment presents operational traffic flow movements with 25 per cent of waste transported by road and 75 per cent by river as the nominal scenario and 100 per cent waste transported by road as a reasonable worst case scenario. These give daily trip generations of 317 two-way movements and 790 two-way movements, respectively. Under both scenarios there would be 104 staff car movements whilst the remainder would be Medium Goods Vehicles. Peak hour movements are forecast to be low at 13 two-way movements in the nominal scenario and 33 two-way movements in worst case scenario. The peak hour assessment on the local highway network concludes that the development proposals do not have a severe impact. The Medium Goods Vehicle movements are stated to be mostly evenly spread throughout the 24-hour day and the facility will operate seven days a week. It is questionable how the even spread of vehicles will work in practice. Further information is sought from the Applicant to clarify the assumptions made. Unless river transport of waste material is maximised then the development would not accord with Policies CS03 and CS15.
- 9.12 With regard to the Local Implementation Plan, the proposed development includes Staff Travel Plans for construction and operational staff which will support increased modal share for walking, cycling and public transport use. The proposed development does not support the targets related to reducing vehicle kilometres travelled and road traffic emissions of CO₂, NO_x, PM₁₀ and PM_{2.5} as it will generate additional traffic as noted above. A Construction Traffic Management Plan and Delivery and Servicing Plan will be required to adhere to Local Policy.

Other Relevant Local Policy and Guidance

- 9.13 There is no other relevant local policy to note.

Local Impacts

Positive impacts

- 9.14 The proposed development has the potential to transport waste by river to the facility which would reduce development generated traffic demand on the road network.

The Applicant's Navigational Assessment (appendices to the Environmental Statement) suggests 100% of the material could be brought by river.

Negative impacts

- 9.15 Daily traffic movements during the construction period are considered to be significant with over two hundred worker car movements forecast in each of the morning and evening hours, with the assumption that these will take place adjacent to the peak hours for a period of ten months. A capacity assessment of the local highway network during the hours of 07:00 to 08:00 and 18:00 to 19:00 for the construction period is recommended along with a mechanism to ensure that such movements are not undertaken during peak hours.
- 9.16 Daily traffic movements during the operational period are considered to be significant especially Medium Goods Vehicle movements which will have greater impact on the road network. This is expected under both the nominal and worst case scenarios, however it is considered much more severe under the worst case scenario.
- 9.17 The Electrical Connection is forecast to generate either 44 or 120 two-way vehicle movements per day during construction depending on the Programme. The details of the Electrical Connection route and associated works are not yet available. However, it is anticipated that this will have a negative impact on the local highway network where the works are taking place.
- 9.18 The cumulative impacts of the REP construction and electrical connection have not been assessed and these are expected to have a negative impact. Clarification is required from the Applicant as to how the combined potential impact of the REP construction and associated temporary works, and those regarding the Electrical Connection has been assessed. It is important that the added implication of the works associated with the Electrical Connection is considered with the impact of the REP construction especially as there may be programme overlap. As indicated under 6.9.62 of the Environmental Statement, the final details (e.g., method of construction, form of traffic management, the programme, sequence of works, length of time within a location and location of active works) are not known at this stage since no details are currently available. Therefore, there is current uncertainty about overall impact and how adequately such impacts can be successfully mitigated.
- 9.19 The site has direct access to the strategic road network via Norman Road which currently serves another energy facility and several other developments. The increase in traffic, especially Medium Goods Vehicles, along Norman Road and Picardy Manorway will have a negative impact on pedestrians, cyclists and public transport users travelling to and from these nearby developments.
- 9.20 The lack of right turning provision at the access junction leads to additional distances being travelled along Picardy Manorway and the undertaking of U-turns at the adjacent roundabouts which would be a negative impact.
- 9.21 It isn't clear from the Applicant's Transport Assessment how the site will operate in accommodating delivery vehicles in terms of vehicle numbers, parking and manoeuvring. Congestion on the site which may lead to backing up of traffic onto Norman Road would be a negative impact.

Neutral impacts

- 9.22 There are no neutral impacts to note.

10 GROUND CONDITIONS

Policies

London Borough of Bexley Policies

- 10.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant transport policies are also presented from the 2012 Bexley Core Strategy. The following planning policies and guidance documents are considered of relevance to ground conditions:
- 10.2 Saved Unitary development plan policies
- Policy G34 Pollution, hazardous substances and energy efficiency
 - Policy ENV39 Built environment – criteria for development including strategic views
 - Policy ENV40 Contamination and remedial treatment of land
- 10.3 Core strategy policies
- Special spatial objective 3
 - Policy CS01 Achieving sustainable development
 - Policy CS09 Using Bexley's resources sustainably
- 10.4 Special Planning Documents
- Bexley Sustainable Design and Construction Guide

Saved Unitary Development Plan (UDP) Policies

- 10.5 The Council will oppose development which would give rise to unacceptable levels of pollution or land contamination or put occupiers at risk from hazardous substances (Policy G34) and will consider the effect on the surrounding area and the proposed development of existing land contamination (Policy ENV39). The Council will require applicants to survey potentially contaminated land and determine remedial measures to prevent hazards (Policy ENV40). The relevant policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 10.6 The Core Strategy spatial objectives aim to protect and improve the natural environment, public health and safety, and amenity for both current and future generations through minimisation of pollution and reclamation of contaminated land (special spatial objective 3). Sustainable development is to be achieved by, amongst other things, addressing pollution issues such as contamination (Policy CS01), and opportunities to improve the health of the environment (e.g. air, surface water, groundwater and soil quality) and reduce pollution should be maximised (Policy CS09). The Council supports the decontamination and redevelopment of brownfield sites to support new housing and employment growth (Section 4.3.5, p.65). The relevant policy descriptions are included in Appendix 2 to this representation.

Policy Appraisal

- 10.7 The development proposal is considered compliant with the Bexley Saved UDP and Core Strategy in that it includes for the decontamination and development of brownfield land. The Applicant is also proposing to survey the land in accordance with Policy ENV40.

Other Relevant Local Policy and Guidance

- 10.8 The site is not on London Borough of Bexley's Brownfield Land Register.

- 10.9 Guidance 34 of the Bexley Sustainable Design and Construction Guide (SPD) states that biodiversity should be protected and enhanced through avoidance of soil compaction and pollution of soils and water. Protection of soils is proposed by the implementation of a CoCP and the proposed development is therefore compliant with this guidance, subject to review of the final CoCP.

Local Impacts

- 10.10 The application site is known to be affected by land contamination and parts of the site have been subject to previous site investigation and remediation. Contamination is likely to be discovered during site development, and asbestos in soil and ground gases have been identified as requiring remediation. Groundwater and surface water are also thought to be affected by contamination in the area of the outline consented Data Centre.

Positive impacts

- 10.11 No positive impacts have been identified arising from the proposed development in relation to ground conditions.

Negative impacts

- 10.12 No negative impacts have been identified arising from the proposed development in relation to ground conditions.

Neutral impacts

- 10.13 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. It is considered that any land contamination present on the data centre/construction compound site will be dealt with through conditions under planning consent 15/02926/OUTM.

11 TOWNSCAPE AND VISUAL

Policies

London Borough of Bexley Policies

- 11.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant transport policies are also presented from the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 11.2 Saved Policy ENV35 seeks the protection and long term retention of trees of amenity, nature or landscape conservation value, as well as new tree and hedge planting as part of a landscaping scheme for development proposals where 'appropriate'.
- 11.3 Saved Policy ENV39 aims to protect and enhance the quality of the built environment by ensuring new development are of a high standard of design and compatible with the character of the surrounding area (with respect to scale, massing, height, layout, elevational treatment, materials and/or intensity of development). The same policy also requires that new developments are appropriately landscaped (including the retention of appropriate trees and shrubs), and takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings.
- 11.4 Saved Policy TS13 relates to the Thames Policy Area in which the proposal lies, and seeks to protect and enhance the character of the area through good quality design appropriate to its context, the protection of views and skylines and the creation of new focal points, spaces, vistas and viewpoints as opportunities arise, and providing an attractive, safe and interesting riverside walk alongside the Thames (Policy TS14 also aims to provide improved access to the waterside). The Policy also requires developers to prepare design statements for all significant development proposals within the Thames Policy Area.
- 11.5 The following saved UDP policies (2007) were wholly replaced by the Bexley Core Strategy (2012):
- G26 Conservation of the built and natural environment
 - G27 Open land including water trees and woodland
- 11.6 The relevant policy descriptions are included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 11.7 Core Strategy Policy CS03 focuses on the Belvedere geographic region and seeks to ensure that all new development is built to high design standards and enhances the public realm. Policy CS09 and Policy CS17 both aim to protect, enhance and promote green infrastructure. In addition, Policy CS17 (which focuses specifically on Green Infrastructure) seeks to provide new open space as part of new developments, increase connectivity between the network of green spaces and habitats and restore waterways, protect and enhance biodiversity. The relevant policy descriptions are included in Appendix 2 to this representation.

Policy Appraisal

- 11.8 There is general compliance with the Saved Policies in the UDP that relate to landscape. For example, the new buildings will be constructed in brownfield areas so that the loss of open land/ woodland/ marsh is avoided, and the Proposed Development would not be visible from protected views (i.e. those in the London View

Management Framework). In addition, trees will be retained where possible and any vegetation lost will be replaced as sought by Saved Policy ENV35. A landscape scheme has also been proposed in line with Saved Policy ENV35. This is considered appropriate to the site's riverside setting, focussing on low level planting and linking / enhancing existing habitats with use of native and indigenous shrubs and wildflower grasses. The proposal retains the access along the Thames in line with Saved Policy TS13. The skyline in some views will change, but the proposal has the potential to create a new focal point within the Thames Policy Area as recommended in Saved Policy TS13.

- 11.9 The final design of the scheme is not known at this stage, but it is anticipated that a high quality of design can be achieved in line with Saved Policy ENV39, Saved Policy TS13 and Core Strategy Policy CS03.

Other Relevant Local Policy and Guidance

- 11.10 The Guidance for Reach 5 (Halfway Reach and Erith Reach) set out in the Thames Estuary Partnership's Thames Strategy East (2008) aims to enhance views from the river by establishing large scale woodland planting, improve the Thames Path in front of the Crossness Sewage Works and ensure new industrial buildings address and relate well to the river and are of commensurate quality with the Ford Factory and the East London Sewage Incinerator. Further details on this guidance document is included in Appendix 3 to this representation.
- 11.11 This proposal does not provide the opportunity for large scale woodland planting (as this would not be appropriate for this scheme), but there is certainly the opportunity to achieve a high quality of design for the building in accordance with the Thames Strategy East.

Local Impacts

Positive impacts

- 11.12 There will be some positive long term effects on character and visual amenity resulting from the creation of a new building and focal point of skyline interest in a location currently defined by car parking, waste ground, scrubland, roads, and sheds. This positive change will be experienced by people walking on the Thames Path National Trail, people on the Public Right of Way (PRoW) between Crossness Nature Reserve and Eastern Road (VP4), people on the PRoW off Picardy Manorway (VP5), people on the PRoW at South Mere west of Erith Marshes (VP6), people on the Green Chain Walk long distance route at Halt Robin Road (VP9) and people across the Thames on the PRoW west of Horse Shoe Corner (VP11).

Negative impacts

- 11.13 The main negative impacts will arise from construction of the scheme which will temporarily change the character of this Thames-side site from an area of car parking, waste ground, scrubland roads, and ancillary features to a busy construction site including large scale cranes. These cranes and construction activities would also intrude into views from a number of locations, with the following held to be significant for the purposes of EIA: the Thames Path, the paths across Crossness Nature Reserve (VPs 2&3), the PRoW at South Mere west of Erith Marshes (VP6), the edge of the Crossness Conservation Area (VP7), Lesnes Abbey (VP8), the London Loop on Ferry Lane between Frog Island and Jetty (VP10) and across the Thames on the PRoW west of Horse Shoe Corner (VP11).
- 11.14 In the longer term (during operation) there will be some negative impacts on landscape character as a result of the reduction in connectivity between marshland

areas and the river. Negative impacts will also affect walkers on the Thames Path to the east of the site as a result of reduction in visual links between the marshland and the river, and users of the PRoW across the Crossness Nature Reserve due to the large scale of the buildings as seen from this location. These effects are deemed to be significant for the purposes of EIA.

Neutral impacts

- 11.15 A number of neutral (or negligible) impacts have been reported in the Environmental Statement during operation – these neutral impacts tend to be on mid distance views (such as the edge of the Crossness Conservation Area, Lesnes Abbey and the London Loop along Ferry Lane) where the proposed development will be in keeping with the existing industrial elements of the view.

12 NOISE AND VIBRATION

Policies

London Borough of Bexley Policies

- 12.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant transport policies are also presented from the 2012 Bexley Core Strategy.

Saved Unitary Development Plan Policies

- 12.2 Saved Policy ENV39, which aims to protect and enhance the quality of the built environment by ensuring new development are of a high standard of design, states that the Council will consider the extent to which proposals have any unreasonable effect on the surrounding area by reason of emissions, including noise. The relevant policy description is included in Appendix 1 to this representation.

Bexley Core Strategy February 2012

- 12.3 Policy CS01, Achieving Sustainable Development, states that sustainable development will be achieved by maximising the effective and efficient use of natural and physical resources whilst addressing pollution issues, including noise. The relevant policy description is included in Appendix 2 to this representation.

Policy Appraisal

- 12.4 The noise and vibration assessment of the proposed development has taken account of these policies 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.

Other Relevant Local Policy and Guidance

- 12.5 Current London Plan (2016) Policy 7.15 and the draft London Plan (2018) Policy D13, relate to reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes. The relevant policy descriptions are included in Appendix 3 to this representation.
- 12.6 The operational noise criterion for noise from fixed plant was provided by LBB Environmental Health Officer (EHO) during scoping consultation.

Local Impacts

Positive impacts

- 12.7 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

- 12.8 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

- 12.9 The noise and vibration assessment of the proposals has concluded that the overall impact on the local area would be neutral. This would be achieved through effective mitigation measures employed during the design of the plant and during the construction process.

13 FLOOD RISK AND WATER RESOURCES

Policies

London Borough of Bexley Policies

- 13.1 Relevant saved policies are taken from the 2012 Addendum to the 2004 UDP and the relevant transport policies are also presented from the 2012 Bexley Core Strategy.

Saved Unitary Development Plan (UDP) Policies

- 13.2 Saved UDP Policy G8 aims to encourage developments to reduce the effects of flooding and adverse impacts, including water pollution.
- 13.3 Saved UDP Policy TS13 aims to protect and enhance the character of the Thames Policy Area by provision of an attractive and accessible Thameside environment. The proposed development falls within this Thames Policy Area.
- 13.4 Saved UDP Policy TS14 requires all waterside developments to provide improved access to the waterside for recreational purposes.
- 13.5 Saved UDP Policy TS15 promotes the protection of wildlife and the improvement for wildlife of the river and Thames side habitats such as watercourses and dykes. Development that diminishes these habitats will be resisted.
- 13.6 The relevant policy descriptions are included in Appendix 1 to this representation.

London Borough of Bexley Core Strategy February (2012)

- 13.7 LBB's Core Strategy sets out the Council's long-term vision for development in the borough. It aims to support a strong, sustainable and cohesive community via sustainable development. Below are the relevant policies to the proposed development application with regards to the LBB Core Strategy:
- 13.8 Policy CS08 relates to adapting to and mitigating the effects of climate change, including flood risk
- 13.9 management. This policy states that all development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development. This policy concerns flood risk adaption due to climate change.
- 13.10 Policy CS17 relates to green infrastructure. Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced and promoted as valuable resources. This aim is to be achieved by appropriate development.
- 13.11 The relevant policy descriptions are included in Appendix 2 to this representation.

Policy Appraisal

- 13.12 The Applicant's proposal references the LBB UDP and Core Strategy. The proposed mitigation discussed in the Environmental Statement and the CoCP will mitigate against effects that are likely to arise during construction and has been developed using best practice guidance documents and conforms to local policies. The outline drainage strategy has been designed to mitigate the effects of climate change (i.e. increased rainfall intensities) and flood risk by managing the surface water on site and restricting it to the greenfield rate, therefore providing a betterment.
- 13.13 The Applicant does not refer to 'green infrastructure', which would be defined in this locality as the marsh dyke system of Crossness Nature Reserve and any green space

(such as roadside verges) on or near the site. Furthermore, a designated strategic green corridor borders the site. Improvements and opportunities to provide environmental net gain as part of these proposals should be considered further by the Applicant in order to fully meet local policy objectives.

Other Relevant Local Policy and Guidance

- 13.14 This section outlines the other local policies and guidance relevant to the proposed development. The relevant policy descriptions are included in Appendix 3 to this representation.

London Borough of Bexley Growth Strategy

- 13.15 The LBB Growth Strategy is intended as a first step towards a coordinated effort across organisations to maximise the benefits of growth for the borough's current and future residents and businesses. The strategy sets out a number of ambitions. Below are the relevant ambitions to the proposed development application with regards to the LBB Growth Strategy:

Theme 6

Green and blue infrastructure ambition 2: Supporting maintenance and enhancement of blue Infrastructure - Bexley regards watercourses as an important aspect of the borough. This ambition sets out consideration to the positive incorporation, maintenance and enhancement of local water courses.

Green and blue infrastructure ambition 4: Protecting and enhancing biodiversity and strategic green corridors - This ambition sets out the protection and enhancement of existing green spaces and infrastructure in growth areas for habitats and connectivity between them, benefitting biodiversity.

London Plan

- 13.16 The London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. Below are the relevant policies to the proposed development application with regards to the current London Plan (London Plan (2016)):
- 13.17 London Plan (2016) Policy 5.12 Flood risk management – This policy aims to ensure the correct consideration of flood risk management in London that is vital to ensuring the city's sustainability, particularly as 15% of London is situated within a recognised flood risk zone from either tidal or fluvial flooding. Importantly, the proposed development is located within an area of residual flood risk, benefitting from tidal defenses.
- 13.18 London Plan (2016) Policy 5.13 Sustainable drainage – Due to increased surface water flood risk, development should utilize sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible
- 13.19 London Plan (2016) Policy 5.14 Water quality and wastewater infrastructure – As most of London's waterbodies fail to achieve 'good' ecological status/potential this policy sets out the requirements of the Water Framework Directive to enhance their status.
- 13.20 London Plan (2016) Policy 7.17 Metropolitan Open Land – The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL). MOL has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality

and accessibility. The Crossness Nature Reserve is a 25.5-hectare site adjacent to the proposed development which is a designated area of MOL.

- 13.21 London Plan (2016) Policy 7.19 Biodiversity and access to nature – London contains numerous sites of importance for nature conservation. The Mayor expects London's biodiversity and natural heritage to be conserved and enhanced for the benefit of current and future Londoners.
- 13.22 London Plan (2016) Policy 7.29 The River Thames – The River Thames is a strategically important and iconic feature of London. This role should be protected and promoted. This refers to the Thames Policy, in which the proposed development is situated.
- 13.23 Further to the London Plan, 2016, below are the relevant policies to the proposed development application with regards to the suggested additions/revisions via the draft New London Plan (Draft New London Plan (2018)):
- 13.24 Draft New London Plan (2018) Policy G1 Green infrastructure – As per London Plan (2016) with the suggested addition, 'development proposals should incorporate elements of green infrastructure that are integrated into London's network of green open spaces', i.e. Crossness Nature Reserve.
- 13.25 Draft New London Plan (2018) Policy G3 Metropolitan Open Land – As per London Plan (2016) with the suggested change to wording highlighting that the 'overall quantum of MOL is not reduced, and that the value of the land designated as MOL is improved'.
- 13.26 Draft New London Plan (2018) Policy G4 Local green and open space – As per London Plan (2016) with the suggested addition, 'development proposals should, where possible create areas of publicly accessible open space' and, 'resist the loss of protect open space'.
- 13.27 Draft New London Plan (2018) Policy G6 Biodiversity and access to nature – As per London Plan (2016) with numerous suggested additions relating to ecological corridors, consideration to SINCs and designated nature conservation sites.

Thames Estuary 2100 (TE2100)

- 13.28 The TE2100 project was established with the aim of developing a strategic flood risk management plan for London and the Thames estuary through to 2100. The proposed development falls under the East London action zone as policy unit Thamesmead. The plan recommends flood risk management to take further action to keep up with climate and land use change so that flood risk does not increase. The marsh dyke system of Crossness Nature Reserve is referenced as a source of fluvial flooding.

Policy Appraisal

- 13.29 The LBB Growth Strategy contains ambitions based on 'green and blue infrastructure' that would be beneficial to the proposed development, council and immediate area. The proposed development lies next to an area of important green infrastructure (Crossness Nature Reserve) and strategic green corridors bound the site to the north and the west. Therefore, these ambitions should be noted and taken in account during the lifetime of the proposed development.
- 13.30 The main London Plan policies above are referenced in the Applicant's Environmental Statement chapter and its appendices. These documents address flood risk management and provide evidence of consideration of SuDS. An additional document, Appendix H.1 of the Environmental Statement (water framework directive compliance statement) indicates that the proposals are compliant with the Water Framework Directive (WFD). The Applicant is not clear on the subject of MOL, the designation given to the Crossness Nature Reserve and there is no reference to this

designation. The Applicant should include information of this designation in the ES, understanding that MOL is of a sensitive nature, has multiple stakeholder, is afforded the same protection as green belt land and under Policy G3 of the London Plan (2018) the requirement that the overall quantum of MOL is not reduced, and that the value of the land designated as MOL is improved. With the exception of MOL (Policy 7.17) the Applicant's proposal reflects the main and relevant policies of the London Plan.

- 13.31 With regards to the TE2100 policy, this important document is referenced and the Applicant has provided a report on the existing flood defence structures (Appendix E, survey by Tony Gee and partners LLP) and is working with the Environment Agency to deliver a Statement of Common Ground with respect to the tidal assets (in varying condition with ownership to be confirmed) that line the River Thames to the north of the site. Furthermore, the TE2100 modelled flood levels and flood defence levels are used for the tidal asset review and flood risk assessment. The Applicant's proposal documentation does not echo the concern of the TE2100 document that 'most of the ground level is very low (about 0 to 1 mAOD)' indicating that the area is particularly vulnerable to flooding.

Local Impacts

- 13.32 The Applicant has not raised flood risk and water resources as a significant concern in the Environmental Statement. Sections 11.2.1 to 11.2.3 below provides a brief assessment on the impacts of the proposed development from LBB's perspective.

Positive impacts

Tidal Flood Defences

- 13.33 The Applicant has, as part of the Environmental Statement, undertaken a tidal asset condition study of the assets that form the northern perimeter of the site. It is understood that the Applicant is working towards a Statement of Common Ground with the Environment Agency as a Thames riparian owner and that they have raised concerns over the requirement to raise the flood defence crest within the lifetime of the proposed development. Although not identified by the Applicant in the Environmental Statement, and dependent on the agreed condition of the tidal walls, any remediation work would serve as a positive impact to the flood risk resilience of the immediate area. Furthermore, consideration of the requirements for the potential future works/maintenance to raise the tidal flood defence crest levels should be taken into account.

Drainage

- 13.34 The drainage plan is currently in an indicative form and it is noted that a robust drainage system is required to attenuate surface water flows due to increased impermeable surfaces (60% of the land area). The surface water strategy outlines how the additional surface water will be dealt with at site and indicates that this has been undertaken in consultation with the Environment Agency and the LBB with agreement of attenuation to a greenfield rate of 35.3l/s. This is a recognised betterment. The final drainage strategy should maintain that all surface water runoff is managed within the marsh dyke system of Crossness Nature Reserve and not be discharged to sewer and be secured via a DCO requirement on the finalisation of the proposed development layout.
- 13.35 There are no further positive impacts identified in relation to the proposed development in regards to flood risk and water resources.

Negative impacts

Crossness Nature Reserve

- 13.36 This designated area of MOL is an important habitat for flora and fauna, including water voles, and is owned by Thames Water. Multiple stakeholders have concerns for this wetland from the construction and operational phase of the proposed development. Contaminated discharge from construction activities or roads on the site could have a negative impact to the water quality of the marsh dyke system and the fauna that depends on it. The Applicant has indicated that a Biodiversity Metric is being developed identifying options for offset, but more information is required to assess the validity of this approach.

Neutral impacts

- 13.37 The Applicant has not identified any neutral impacts in the Environmental Statement chapter; however, potential negative impacts may be neutralised by mitigation.

Thames Groundwater Bodies

- 13.38 Foul waste water generated from the welfare facilities is expected to undergo treatment via a packaged wastewater treatment plant and after final settlement discharged to the underlying groundwater. This is not likely to impact the underlying Thames groundwater body and is considered a neutral impact on the basis of the Applicants' duty of care to observe the Environmental Permitting (England and Wales) Regulations 2016, Schedule 21. The drainage strategy indicates that the effluent will be treated to achieve the required standard for discharged and would be agreed with the Environment Agency, via the environmental permit.

Water Quality

- 13.39 The surface water drainage strategy confirms the outfall of the system into the marsh dyke system of Crossness Nature Reserve to the south of the site, and is restricted to 35.3l/s. Surface water runoff that is contaminated (suspended solids and metals due to on site activities and vehicles) would cause water quality concerns in the marsh dykes and potentially affect downstream WFD objectives. The outline drainage strategy indicates that runoff from the vehicle routes and circulation areas shall pass through full retention separators, therefore undergoing treatment. This treatment train would remove pollutants, but the resulting discharge water quality must be reviewed and agreed with the Environment Agency and an Environmental Permit to discharge sought. This should be secured via a DCO obligation to ensure that discharge from the proposed development does not affect Crossness Nature Reserve.
- 13.40 Furthermore, Appendix H.1 of the Environmental Statement (WFD compliance statement) indicates that the proposals are compliant with the Water Framework Directive (WFD). Therefore, the proposed development should not cause deterioration of water bodies within vicinity of the site, nor compromise their objectives. They are therefore compliant on meeting the standards required under the WFD.

14 CONCLUSIONS

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

APPENDIX 1 - POLICIES IN SAVED UNITARY DEVELOPMENT PLAN

Planning policy (waste)

Policy E1 Criteria for proposed industrial and commercial development

Proposals for development for industrial and commercial uses will be resisted unless the following conditions are met:

1. there should be no material adverse effects on the health, safety or amenities of the occupants of residential areas or neighbouring properties;
2. the development is satisfactory in terms of design, scale and layout in relation to adjoining uses and buildings;
3. the development satisfies the requirements of Policy T6 with regard to effects on the local highway network and the availability of public transport, and adequate site access can be provided; and
4. the proposal makes adequate provision for vehicle parking in accordance with the Council's current standards and there is adequate turning and manoeuvring space.

In addition the Council will take into account the following when determining applications for planning permission for these uses:

5. provision of appropriate landscaping, including the retention of suitable trees and shrubs and nature conservation features; and
6. the need for safeguards against discharges from the development that could lead to the build up of high levels of pollution or find their way into water courses.

Policy E3 Primary employment areas

The Council will encourage industrial and commercial uses to locate in the Primary Employment Areas shown on the Proposals Map in accordance with the area policies set out in this chapter and Chapter 12 (Thames-side). Land and buildings in the Primary Employment Areas will be safeguarded for industrial and commercial uses as appropriate to each area.

Waste economics

Policy G1 Quality of environment and economy

The Council will seek to protect, maintain and improve the quality of the built and natural environment for the economic and social well being of the borough whilst making efficient and effective use of the borough's land resources. In particular, proposals for development which would detract from the overall environmental quality of an area will not be acceptable

Policy G4 Social inclusion

The Council will, within available resources, seek to provide adequate means and opportunities for all sections of the borough's population to have access to housing, jobs, leisure, social and community facilities. In particular and wherever possible, proposals relating to special housing needs will receive favourable consideration.

Policy G32 Waste management proposals – consideration within context

Proposals for waste management developments will be considered within the context of national sustainable development principles of best practicable environmental option, the waste hierarchy and the proximity principle.

Policy E13 Special Industrial Zones

The Special Industrial Zones shown on the Proposals Map will be reserved for the following uses as long as a demand exists for sites for them in this borough:

1. ready-mixed concrete manufacture;
2. manufacture of building products of concrete, cement, lime or plaster;
3. ground and processed minerals, including roadstone;
4. processing and distribution of sea-dredged aggregates;
5. working of stone and other non-metallic minerals;
6. waste processing, including recycling and scrap metal sorting; and/or
7. the former special industrial uses identified under the Use Classes Order 1987 (see Appendix J).

Proposals should meet the conditions in Policy E1 and, where appropriate, also comply with Policy WAS2.

Proposals for waste incineration and waste to energy plants will only be permitted where they form part of the Mayor of London's Municipal Waste Management Strategy and Spatial Development Strategy.

The Council will normally resist proposals to establish these uses outside the Special Industrial Zones and will in addition apply Policies T6 and TS14 to all developments within the Special Industrial Zones.

UDP Section 3.19 The emphasis of local economic development policy in this Plan is on retaining employment, sustaining the local economy and the provision of additional, good quality local job opportunities, which provide an attractive alternative to longer distance commuting. Development will need to satisfy specified environmental criteria and have regard to local traffic and environmental conditions. This approach will contribute to environmental objectives by reducing air, water and noise pollution and seeking to locate new development, wherever practicable, so as to minimise transport of people and resources.

Air quality

Policy ENV41 Air Quality Strategies and preparation of an Air Quality Assessment

The Council will have regard to national and local Air Quality Strategies in seeking to ensure that proposals for development do not compromise air quality objectives. The Council will require an applicant to prepare an Air Quality Assessment where proposals:

1. include industrial activities with potentially significant air borne emissions;
2. have the potential to increase significantly the volume of traffic flows or the ratio of heavy goods vehicles, or the level of congestion so as to place air quality objectives at risk;
3. have the potential to increase the personal exposure of individuals at non-occupational locations to levels of air pollution which are likely to exceed objectives set in either national or local Air Quality Strategies; and/or
4. are located in (or are likely to effect) an Air Quality Management Area, which would significantly change the pattern of traffic flows or could lead to emissions of one or more of the pollutants specified in the national Air Quality Strategy.

The Council may resist or impose conditions on applications where an air quality assessment shows that the proposed development will have an adverse effect on the achievement of national or local air quality objectives.

Biodiversity

Policy ENV28 Local Nature reserves (LNR) sites

The Council will declare and manage as Local Nature Reserves (LNR) sites in which it has a legal interest, that are of special importance to the local community for wildlife and nature conservation. Within these areas development will be resisted that would endanger the preservation of those special characteristics that lead to designation.

Policy ENV32 Sites of Special Scientific Interest – boundaries and protection

Development will not be permitted within Sites of Special Scientific Interest as indicated on the Proposals Map, and which may be notified from time to time by English Nature, unless it can be shown that there would be no damage to scientific or nature conservation interests.

Policy ENV33 Sites of Special Scientific Interest – development of land adjoining

Development of land adjoining Sites of Special Scientific Interest will be resisted unless it can be shown that there would be no damage to scientific or nature conservation interests.

Policy ENV35 Trees and hedges – planting, protection and retention

The Council will seek the protection and long term retention of trees of amenity, nature or landscape conservation value on development sites or elsewhere where they might be at risk and, in appropriate cases, will require new tree and hedge planting as part of a landscaping scheme for development proposals.

Policy TS15 Wildlife habitats – riverside and other watercourses

The Council will promote the protection of wildlife and the improvement for wildlife of the river and of habitats on Thames-side, including its adjacent minor watercourses and dykes. Development that diminishes these habitats will be resisted.

Historic environment

Policy ENV39 Built environment – criteria for development, including strategic views

In order to protect and enhance the quality of the built environment, the Council will seek to ensure that all new developments, including alterations and extensions, changes of use and other operations, including highway improvements, are satisfactorily located and are of a high standard of design and layout. In determining applications for development the Council will consider the extent to which the proposal:

1. is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;
2. is appropriately landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant;
3. has any unreasonable effect on the surrounding area by reason of noise and any emissions to land, air, or water, and is not, by reason of its location, itself adversely affected by such conditions as may already be in existence within the neighbourhood;
4. makes adequate provision for vehicle parking in accordance with the Council's vehicle parking standards;
5. takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment; and

takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings or is located on a prominent skyline ridge.

Policy ENV46 Conservation areas – new development

Any new development, alterations or extensions to existing buildings or structures within Conservation Areas should preserve or enhance the character or appearance of the area and in order to promote a high standard of design, the following shall apply:

1. other than in exceptional circumstances, outline applications will not be appropriate and all applicants will be expected to indicate clearly how the proposed development relates to surrounding buildings;
2. design guidelines will be produced for each Conservation Area as resources permit;
3. Planning Briefs and design guides will be produced where appropriate for particularly important or sensitive sites; and

developers will be encouraged to employ the specialist services of qualified professionals such as architects, urban designers and town planners.

Policy ENV47 Conservation areas – demolition

The Council will generally oppose the demolition of buildings or alterations that involve the removal of parts of buildings within Conservation Areas, where they contribute to the character or appearance of the area.

Policy ENV51 Listed buildings - protection

The Council will oppose the demolition of any listed building, in whole or in part, or of any structure within the curtilage of a listed building which contributes to the character of that building and will resist any proposals which detract from the setting of a listed building and in considering any proposal to alter or extend a listed building, will have regard to the desirability of preserving the building and its setting.

Transport

Policy G23 Car Parking (note that points 1 and 5 have been removed from the saved Policy)

The Council will coordinate the provision of on and off-street parking in the borough with parking controls and charging policies and the location of development in order to:

- 2** protect and enhance the environment and amenity, particularly of shopping and residential areas and open spaces;
- 3** encourage the shared use of parking, particularly in shopping centres and as part of major proposals;
- 4** ensure no more parking spaces are provided as part of a development than a Transport Assessment may justify or where a Transport Assessment is not required, no more parking spaces are provided than prescribed in the Council's parking standards; and
- 6** sustain the development of the local economy and access to jobs, services, shops and recreational facilities in accordance with the Local Implementation Plan.

Policy T6 Optimising use of the existing transport network

The Council will normally refuse any development proposals that would either cause local traffic flows to rise above the design flow for a road or would generate additional traffic on a road on which flows are already considered to exceed design flow, unless:

1. either the affected road is included in an improvement programme that would increase the design flows to a level capable of accepting increased demands from the base flow and the development or the applicant is prepared and in a position to undertake un-programmed road improvements, including traffic management and environmental measures, to increase the design flow capacity of relevant highway links to a level capable of safely accommodating increased demands from the development; and

2. there are no environmental, or other planning or road traffic objections to such highway improvements taking place.

(Calculation of base flow shall take account of developments permitted but not yet implemented.)

Policy T14 Cycle networks, routes and cycle parking facilities

The Council will take account of the needs of cyclists in the design of highway and traffic management schemes and support the development of both strategic and local cycle networks to provide safe, convenient routes both within the Borough and linking with routes in adjacent boroughs and districts. The Council will seek to provide for and promote cycling in development proposals by requiring as appropriate:

1. the provision of safe and attractive cycle routes both within major developments and linking to existing or planned cycle networks;
2. the provision of convenient and secure cycle parking in accordance with the cycle parking standards set out in Annex 1 to this chapter.

Policy T17 Parking – off-street parking spaces

Applicants should make provision for off-street car parking spaces in their developments, including applications for changes of use, up to the maximum levels of parking prescribed in Annex 1 to this chapter, unless a Transport Assessment of the development indicates the need for higher levels of parking.

In the case of smaller developments, the applicant may be required to demonstrate how the travel needs arising from the development will be met in circumstances where there are concerns about the impact of on-street parking on amenity and traffic flow.

Parking spaces should be located so as to discourage on-street parking and respect the amenity of near-by residents.

Ground conditions

Policy G34 Pollution, hazardous substances and energy efficiency

In considering proposals for development, the Council will have regard to matters of pollution, hazardous substances and energy efficiency and will oppose development which would give rise to unacceptable levels of air, ground or surface water pollution, including pollution to underground water resources, excessive noise or the contamination of land or put occupiers at risk from hazardous substances. The Health and Safety Executive will also be consulted on applications to site new development where hazardous substances are to be used or stored and on applications to develop at, or within the vicinity of, existing establishments where hazardous substances are present.

Policy ENV39 Built environment criteria for development including strategic views

Policy wording set out above

Policy ENV40 Contamination and remedial treatment of land

In accordance with policies G34 and ENV39, the Council will require applicants to survey sites that are known or suspected to be contaminated to determine the source of any pollutants and any remedial measures necessary to prevent these causing hazards either during construction or through subsequent use of the site.

The Council may require applicants to enter into an appropriate legal agreement to ensure that the necessary remedial measures are made.

Townscape and visual

Policy ENV35 Trees and hedges – planting, protection and retention

Policy wording set out above

Policy ENV39 Built environment criteria for development including strategic views

Policy wording set out above

Policy TS13 Protection and enhancement of the character of the Thames Policy Area

The Council will protect and enhance the character of the Thames Policy Area (see Map 12.1), giving particular attention to:

1. Achieving good quality design appropriate to its context;
2. The protection of views and skylines and the creation of new focal points, spaces, vistas and viewpoints as opportunities arise;
3. Providing an attractive, safe and interesting riverside walk alongside the Thames, and safe routes to the riverside (see also Policy TS14)

Developers should prepare design statements for all significant development proposals within the Thames Policy Area.

Policy TS14 Access to the riverside

Subject to Policies TS15 and TS20, the Council will require all developments on the waterside of the River Thames to provide improved access to the waterside for purposes of recreation on or adjacent to the river and, where appropriate, an extension and/or improvement of the publicly accessible river walk. This will usually be achieved by planning obligations. The existing riverside footpath and accesses will be safeguarded.

Noise and vibration

ENV39 Built environment criteria for development including strategic views

Policy wording set out above

Flood risk and water resources

Policy G8 Flood risks

Development, including the raising of the level of land, will not be acceptable where it would be at direct risk of flooding or likely to create or increase the risk of flooding elsewhere or likely to affect adversely the quality of underground or surface water. The Council will have regard to the Environment Agency's advice on flooding and water pollution. All development must safeguard existing tidal defences and land drainage facilities.

Policy TS13 Protection and enhancement of the character of the Thames Policy Area

Policy wording set out above

Policy TS14 Access to the riverside

Policy wording set out above

Policy TS15 Wildlife habitats – riverside and other watercourses

Policy wording set out above

APPENDIX 2: POLICIES IN BEXLEY CORE STRATEGY FEBRUARY 2012

Planning policy (waste)

Core Strategy Spatial Objectives

1 Take account of the impacts of climate change, and reduce flood risk to and from existing and new development, and seek to reduce carbon dioxide emissions, increase energy efficiency, and increase the use of renewable energy sources.

4 Minimise waste generated in the borough through increasing re-use and recycling, recover and dispose of waste without endangering human health or harming the environment, and ensure waste is disposed of as near as possible to place of production.

8 Promote sustainable forms of transport and seek to reduce the need to travel by ensuring that jobs and other facilities are easily accessible to homes, and work towards a more comprehensive, high-quality and integrated transport system, which better meets the needs of residents, businesses and visitors to Bexley.

Policy CS01 Achieving sustainable development

The Council will seek to achieve sustainable development, in line with the vision set out in Bexley's Sustainable Community Strategy, to create a 'strong, sustainable and cohesive community', in order to provide people equal access to a better quality of life, protect the environment, promote the local economy and encourage an active and healthy lifestyle. The Council will seek to meet: the London Plan housing target for Bexley, by seeking to achieve the minimum average housing target of 335 units; and projected growth in jobs, by maximising the potential of the Thames Gateway and London Plan Opportunity Areas; ensuring that higher density, mixed use developments are located in town centres and other accessible locations with supporting infrastructure. These types of development will only be permitted outside of the identified growth areas where it can be additionally shown that they demonstrably contribute to the sustainable development of the borough and that the principles set out below have been applied. Developers will be required to address the sustainable development principles set out below. In conjunction with the requirements identified in this Core Strategy, as well as the requirements of all other documents that make up Bexley's Development Plan, sustainable development will be achieved by applying the following principles:

a adapting to and mitigating the effects of climate change, including sustainably retrofitting existing building stock where possible;

b maximising the effective and efficient use of natural and physical resources, including land, water and energy, whilst addressing pollution issues, such as contamination, noise and air quality, to contribute to the health and well being of the community and the environment;

c ensuring housing provision meets the needs of Bexley's current and future population, including those unsuitably housed, and that housing type and tenure reflect local circumstances and requirements, as well as other relevant Development Plan targets;

d helping the borough to continue to play a key role in contributing to London's economic growth and prosperity;

e preserving and enhancing the existing network of town centres, including their role as a focus for new services and infrastructure, whilst enhancing the role and contribution of local neighbourhood centres;

f minimising the distances people need to travel and contributing to the improvement of sustainable transport connections;

g protecting designated areas, such as metropolitan green belt, from inappropriate development so as to preserve, enhance and promote Bexley's network of open spaces and waterways, heritage, biodiversity and geological assets;

h maintaining and improving the best elements of Bexley's suburban character by ensuring new development reflects or, where possible, enhances the unique characteristics of these areas, including residential gardens and the historic environment;

i ensuring that building height, mass and setting enhances the character of the surrounding locality, and requiring proposals for tall buildings to make a positive contribution to the existing character of the surrounding area by being of high architectural quality and appropriate to their local and historic context. The eastern end of Bexleyheath town centre has been identified as the best opportunity for locating tall buildings, subject to further detailed analysis. Old Bexley town centre has been identified as an area particularly sensitive to locating tall buildings and is considered inappropriate for tall buildings. While the majority of the borough is not considered appropriate for tall buildings, potential may exist for such development to be considered, for example: in locations which benefit from good public transport accessibility, exhibit an existing local built character that would allow for taller buildings, would not cause harm to heritage assets and the wider historic environment, and would not increase the risks of flooding, subject to further detailed area/site analysis and meeting various criteria;

j providing a complementary mix of land uses as part of well designed developments in order to contribute positively towards meeting the needs of the local community, to create safe and inclusive places, and manage flood risk; and,

k ensuring existing or proposed infrastructure (including green infrastructure), services and facilities are safeguarded to help improve accessibility and address deficiencies, and that adverse impacts of development, including waste arisings, are mitigated.

Policy CS03 Belvedere geographic region

The vision for the Belvedere geographic region will be achieved by:

a seeking opportunities for renewal and enhancement associated with the region's location within the Thames Gateway and two London Plan Opportunity Areas, whilst acknowledging the need to address low levels of infrastructure, including public transport accessibility, to ensure the area realises its full potential;

b supporting the development of Crossrail to Abbey Wood, capitalising on the opportunities for enhanced facilities presented by this new transport link, and safeguarding land for potential extension of the line between Abbey Wood, Gravesend and Hoo Junction;

c supporting all forms of sustainable transport, including the safeguarding of identified wharves, and working with partners such as the Mayor of London to improve public transport accessibility levels and connections, including the creation of a strategic public transport hub at Abbey Wood station and the investigation of transit or light rail links to the rest of the borough, as well as pedestrian and cycle schemes;

d making contributions to housing and employment growth primarily within the proposed sustainable growth areas identified on Map 3.2 and capitalising on these opportunities to ensure the provision of additional services and facilities, in particular educational and health facilities;

e ensuring that character of neighbourhoods made up of mainly Victorian housing (such as West Heath and Upper Belvedere) and Conservation Areas and listed buildings are retained and that opportunities for environmental improvements to these neighbourhoods, as well as in areas of estate renewal, should be taken where possible;

- f facilitating innovation and economic development, including higher levels of local employment, especially by support of projects that build on Belvedere's emerging knowledge-sector base, such as the Thames Innovation Centre, and proposals that help to intensify and diversify the local employment base including skills and training provision;
- g ensuring that all new development is built to high design standards, and that new commercial property development improves the quality of industrial estates and the public realm, particularly in bringing sites and infrastructure up to modern business standards, including ICT and supporting investigations into the potential for wind turbine development and a decentralised heat and power network within the Belvedere Industrial Area;
- h ensuring all new development addresses the deficit in public open space and access to nature in the region, protects or enhances biodiversity and mitigates against all types of flood risk, particularly through design solutions that incorporate flood resilience and resistance in areas at risk of flooding;
- i supporting the provision of cultural facilities in suitable locations, such as the new visitor centre at Lesnes Abbey Woods and the development of a museum at Crossness Beam Engine House; and
- j designating a Thames-side policy area in further development plan documents, and reviewing and, as appropriate, implementing, the Thames Strategy East guidance document.

Policy CS08 Adapting to and mitigating the effects of climate change, including flood risk management

All development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development.

The Council will achieve this by applying the requirements and targets outlined in national and regional planning policy and guidance to new development.

In particular, this will encompass the requirements of the Mayor's London Plan with regard to environment policies such as: reducing CO2 emissions; the Mayor's energy hierarchy; integrating energy efficiency; decentralised energy (in particular district heating where appropriate); site-wide communal heat networks supported by CHP; adopting on-site renewable energy technologies; sustainable transport (in particular public transport, cycling and walking); green infrastructure; flood risk management; and sustainable urban drainage systems (SUDS), including supporting the Mayor's drainage hierarchy.

In addition, this will comprise:

- a working with local organisations such as schools to invest in energy efficient improvements;
- b monitoring and setting improvement targets for the energy efficiency of Council buildings and developments;
- c improving the efficiency of Bexley's housing stock by educating residents in methods to reduce energy use in the home and actively engaging with relevant retrofitting programmes;
- d requiring the use of sustainable design and construction techniques in new built development, including exceeding current Building Regulations requirements through energy efficiency alone, and sustainably retrofitting existing building stock where possible;
- e investigating opportunities within the borough for the location of zero carbon developments, prioritising those areas being investigated for decentralised energy networks;
- f investigating opportunities for the funding and development of decentralised energy networks in Bexleyheath town centre, Crayford town centre, Belvedere town centre and Employment Area and Erith town centre;

- g following the sequential approach to flood risk management advocated in national planning policy and its associated practice guidance;
- h applying the recommendations of Bexley's Strategic Flood Risk Assessment;
- i supporting green infrastructure (e.g. green and brown roofs) and the contribution it can make, to managing flood risk and surface water, and to the mitigation of the urban heat island effect;
- j supporting the protection of key infrastructure assets, such as Crossness Sewage Treatment Works, from the risks of flooding; and
- k working with partners to prepare a joint urban drainage strategy for London, as well as a local Surface Water Management Plan (SWMP) for Bexley, to address surface water and drainage flooding, including sewer flooding.

Policy CS09 Using Bexley's resources sustainably

Development that seeks to maximise the effective and efficient use of natural and physical resources, while contributing to the health and well-being of the community and the environment, will be encouraged.

The Council will do this by applying the requirements outlined in national and regional planning policy and guidance to new development, in particular the requirements of the Mayor's London Plan with regard to open space and the Blue Ribbon Network, energy and water supplies and resources, air and water quality, water and sewerage infrastructure, noise reduction, contaminated land, hazardous substances and sites and minerals.

In addition, this will include:

- a protecting, enhancing and promoting green infrastructure, including making the borough's parks, open spaces, waterways and recreational facilities an integral part of encouraging healthy lifestyles;
- b making best use of existing physical infrastructure (e.g. sewerage, water supply, telecommunications, transport) and working with partners to ensure infrastructure networks within the borough contribute to improving the health, safety and wellbeing of Bexley's residents;
- c investigating options across the borough for sustainably managing water supplies and resources (through rainwater harvesting, sustainable urban drainage systems (SUDS) and grey water recycling), as well as opportunities for enhancing biodiversity (e.g. green roofs), within Council-owned buildings;
- d maximising the opportunities to improve health of the environment (e.g. air, surface water, groundwater and soil quality) and reducing pollution and conflicts between adjoining land uses, which is fundamental to providing a good quality of life; encouraging the transport and accessibility functions of the borough's waterways, particularly to support the carriage of freight (including minerals), and associated facilities (e.g. safeguarded wharves) on the River Thames in particular; and
- e working with partners to make sure any leisure, transport, freight or development activities on and adjacent to the River Thames and other riverside areas are not detrimental to the quality of the environment in those areas.

Policy CS15 Achieving an integrated and sustainable transport system

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 and seeks to ensure a much improved and expanded role for public transport through the following actions:

a increasing the capacity, frequency, accessibility and safety of established bus and rail facilities;

b working in partnership with Crossrail Limited and TfL to secure Crossrail to Abbey Wood and its potential extension to Gravesend and Hoo Junction, including the protection of the land required for the scheme in accordance with the Safeguarding Directions, and the managing of development to preserve and enhance the viability of the scheme;

c supporting the improvement of interchange facilities at Abbey Wood as part of the Crossrail project and within the borough's major town centres through area based schemes and other initiatives;

d 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 between Thamesmead / Abbey Wood and population and employment centres to the south and south east, along the routes indicatively shown on the vision diagram (Map 2.1).;

e protecting significant green corridors, and seeking opportunities to increase connectivity between the network of green spaces and habitats;

f initiating or supporting the future development of major new transport infrastructure proposals within or affecting Bexley, including the North Bexley Transit, DLR, river passenger services and crossings, and London Underground extensions into Bexley so as to explore, by continued negotiations with TfL, a firm basis for the further progression of these emerging schemes;

g adopting a parking policy that addresses the need for appropriate controls to secure a sustainable environment within the borough, whilst recognising the need to help viable development in town centres and major employment areas;

h improving the efficiency and promoting the sustainability of freight movement in the borough, the protection of viable safeguarded wharves on the River Thames, and ensuring the construction and preservation of rail freight interchange facilities and new wharves where this does not prejudice other objectives of the Core Strategy;

i encouraging walking and cycling within the borough through implementation of local and strategic walking and cycling programmes, school travel plans, local safety schemes and the provision of facilities within development proposals and environmental improvement projects

j developing priority road schemes, where they assist regeneration and/or reduce congestion, whilst generally promoting modal shift away from the use of the car; and

k effectively maintaining and managing the existing highway network to ensure the free flow of traffic, improve the environment, in particular air quality, and promote safety, health and wellbeing.

Policy CS20 Sustainable waste management

In support of the objectives of sustainable waste management and its contribution to sustainable communities, the Council will ensure that land resources are available to implement European and government policy and directives on waste by:

a meeting its waste apportionments and other requirements, such as the Mayor's recycling or composting targets, including collaboration with the other London boroughs as appropriate;

b supporting regionally significant waste management infrastructure, including the Crossness Sewage Treatment Works;

c identifying and safeguarding future sites suitable for waste management uses; and

d setting out criteria for development of new waste management facilities.

In new development, the Council will ensure that waste is managed in ways that protect human health and the environment and will follow the principles of the waste hierarchy as set out in the Waste Management Strategy for Bexley. Where opportunities arise, this principle will also be applied to existing development. Targets have been set, in line with national and regional guidance, and local circumstances, and these will be reviewed as appropriate.

Waste economics

Policy CS01 Achieving sustainable development

Policy wording set out above

Policy CS03 Belvedere geographic region

Policy wording set out above

Policy CS12 Bexley's future economic contribution

Bexley's future economic contribution Bexley will continue to play a key role in contributing to London's economic growth and prosperity. As such, the Council will ensure a sufficient and appropriately located provision of employment land to meet the borough's existing and future requirements. It will promote sustained economic and employment development by: a making the most efficient use of Bexley's land, ensuring a balance between the needs of business and industry and other land-uses that are integral to building sustainable communities, including housing; b safeguarding existing employment land and identifying in future policy documents, such as a development plan document that deals with detailed sites and policies, the 43 to 50 hectares of employment land that the Council will consider for a sensitively managed transfer to other sustainable uses; c promoting Belvedere Employment Area and Bexleyheath town centre as the borough's principal locations for employment, d supporting the growth and intensification of employment around the towns of Erith, Crayford, Sidcup and Welling, as well as the borough's other district and neighbourhood centres; e identifying in future policy documents, such as a development plan document that deals with detailed sites and policies, the sites that will be safeguarded in conjunction with London Plan designations, such as Strategic Industrial Locations, as Bexley's key locations for industry and employment; and f seeking to secure development proposals that enhance and better integrate transport accessibility between Bexley's housing and employment locations, particularly in Opportunity Areas and other places where deprivation exists.

Air quality

Policy CS01 Achieving sustainable development

Policy wording set out above

Policy CS09 Using Bexley's resources sustainably

Policy wording set out above

Biodiversity

Policy CS18 - Biodiversity and geology

The Council will protect and enhance its biodiversity and geological assets, whilst complying with national and regional policy and guidance by:

- a. ensuring development in Bexley does not adversely affect the integrity of any European site of nature conservation importance (including Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) outside the borough. In particular, consideration will be given to potential impacts on the Thames Estuary and Marshes SPA through increased visitor pressure and reduced water quality, and on Epping Forest SAC through reduced air quality;

- b. protecting, conserving and enhancing Bexley's Sites of Special Scientific Interest (SSSI) and Sites of Importance for Nature Conservation (SINC);
- c. resisting development that will have a significant impact on the population or conservation status of protected species and priority species as identified in the UK, London and Bexley Biodiversity Action Plans;
- d. protecting and enhancing the natural habitat as far as practicable, seeking biodiversity enhancements and improved access to nature, particularly in areas of deficiency, through new development, including new residential development and projects that help deliver the Open Space Strategy. Preference will also be given to enhancements which help to deliver the targets for habitats and species set out in the London Plan and Bexley Biodiversity Action Plan;
- e. recognising the value of landforms, landscapes, geological processes and soils as contributors to the geodiversity of the borough, and evaluating whether it is appropriate to designate any Regionally or Locally Important Geological Sites (RIGS or LIGS) in the borough;
- f. 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; and
- g. seeking opportunities to provide for greening of the built environment, including green roofs and walls in new buildings.

Historic environment

Policy CS19 Heritage and archaeology

The Council will manage its 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 underpin 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 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 conserving and enhancing the significance of heritage assets, their setting, and the wider historic environment, including statutorily listed buildings; locally listed buildings of architectural or historic interest, conservation areas, registered parks and gardens, and archaeological sites;
- d protecting heritage assets from development that is likely to adversely impact on the significance, integrity, character or appearance of an asset or its setting;
- e supporting historic restoration schemes through partnership working and seeking funding to enhance heritage and archaeological assets in an appropriate and sympathetic manner; and
- f 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.

Transport

Policy CS03 Belvedere geographic region

Policy wording set out above

Policy CS15 Achieving an integrated and sustainable transport system

Policy wording set out above

Policy CS16 Reducing the need to travel and the impact of travel

The Council will seek to minimise the need for and distances people travel, thereby reducing the time, cost and environmental effects of transportation and improving accessibility and quality of life for Bexley residents by:

a ensuring developments are equipped to benefit from new technology, which helps generate more sustainable travel patterns;

b promoting the provision of live/work accommodation in appropriate developments; and

c promoting travel awareness campaigns, workplace travel plans, area based travel plans and car clubs.

Ground conditions**Special spatial objective No.3 (p11)**

Protect and improve the natural environment, public health and safety, and amenity for both current and future generations of Bexley residents through policies to minimise noise, air and water pollution, and promote the reclamation of contaminated land.

Policy CS01 Achieving sustainable development

Policy wording set out above

Policy CS09 Using Bexley's resources sustainably

Policy wording set out above

Townscape and visual**Policy CS03 Belvedere geographic region**

Policy wording set out above

Policy CS09 Using Bexley's resources sustainably

Policy wording set out above

Policy CS17 Green infrastructure

"Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced and promoted as valuable resources. In particular, this will be achieved by:

a protecting metropolitan green belt and metropolitan open land from inappropriate development;

b seeking opportunities in new development to provide new open space and play space, and ensuring all new developments, where possible, make a positive and appropriate contribution to green infrastructure, and where appropriate, the public realm, either through direct provision of new open space or through planning obligations;

c resisting harmful backland development;

d protecting and enhancing the biodiversity, heritage and archaeological values of open spaces, including the Rivers Thames, Cray, Shuttle and their tributaries within the borough;

e protecting significant green corridors, and seeking opportunities to increase connectivity between the network of green spaces and habitats;

f working in partnership, seeking funding and supporting projects to promote the restoration and enhancement of open spaces, public realm and the Blue Ribbon Network within the borough;

g implementing the priorities outlined in the Bexley Open Space Strategy including, where appropriate, rivers and waterways restoration; and

h providing opportunities within waterside development for river restoration and the protection and enhancement of biodiversity."

Noise and vibration

CS01 – Achieving Sustainable Development

Policy wording set out above

Flood risk and water resources

Policy CS08 Adapting to and mitigating the effects of climate change, including flood risk management

Policy wording set out above

Policy CS17 Green infrastructure

Policy wording set out above

APPENDIX 3: OTHER POLICIES AND GUIDANCE

Planning policy (waste)

Southeast London joint waste technical paper December 2017

Appendix A: London Plan borough level projections and apportionment requirements

LONDON PLAN BOROUGH LEVEL PROJECTIONS (TABLE 5.2) (tonnes per annum)					
	2016	2021	2026	2031	2036
BROMLEY	239,000	243,000	248,000	251,000	256,000
BEXLEY	216,000	219,000	222,000	226,000	230,000
CITY OF LONDON	214,000	213,000	213,000	215,000	217,000
LEWISHAM	192,000	198,000	203,000	208,000	212,000
ROYAL GREENWICH	192,000	196,000	201,000	204,000	208,000
SOUTHWARK	274,000	278,000	283,000	287,000	292,000
TOTAL	1,327,000	1,347,000	1,370,000	1,391,000	1,415,000

LONDON PLAN APPORTIONMENT REQUIREMENTS (TABLE 5.3) (tonnes per annum)					
	2016	2021	2026	2031	2036
BROMLEY	172,000	199,000	238,000	242,000	247,000
BEXLEY	315,000	364,000	437,000	444,000	453,000
CITY OF LONDON	100,000	100,000	100,000	100,000	100,000
LEWISHAM	143,000	166,000	199,000	202,000	206,000
ROYAL GREENWICH	229,000	265,000	318,000	323,000	329,000
SOUTHWARK	172,000	199,000	238,000	242,000	247,000
TOTAL	1,131,000	1,293,000	1,530,000	1,553,000	1,582,000

Southeast London boroughs' capacity from safeguarded operational strategic waste management facilities and potential waste sites

	2016	2021	2026	2031	2036
Bromley	81,932	95,240	102,264	109,288	109,288
Bexley	1,219,584	1,224,297	1,224,297	1,224,297	1,224,297
City of London	0	0	0	0	0
Lewisham	502,297	502,623	502,888	503,152	503,152
Royal Greenwich	93,546	99,072	102,482	105,893	105,893
Southwark	104,850	106,950	109,050	111,150	111,150
total	2,002,209	2,028,182	2,040,981	2,053,780	2,053,780
projected total surplus	871,209	735,182	510,981	500,780	471,780

projected actual surplus capacit	665,609	529,582	305,381	295,180	266,180
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London Plan with Minor Modifications (2018)

Paragraph 9.7.3A Modelling suggests that if London achieves the reduction and recycling set out above, it will have sufficient Energy from Waste capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational.

Table 9.2 - Borough-level apportionments of Household and Commercial & Industrial waste 2021-2041 (000's tonnes)

Barking & Dagenham	6.1	505	537
Barnet	2.6	215	229
Bexley	5.6	456	485

Waste economics

Bexley Growth Strategy December 2017

Section 2.1 Theme 1 – Economic development Context – opportunities and challenges

2.1.1 Bexley, like many outer London boroughs, has a high proportion of working residents who live in the borough to take advantage of the quality of life offered but commute into the City, Canary Wharf and the wider central London area to access a variety of jobs. Additionally, the borough has a broad business base, which includes major multinational companies and award winning, innovative small and medium enterprises (SMEs). Start-up rates are higher than other boroughs.

2.1.2 Key sectors include logistics, construction and manufacturing. In recent years, growth has also been in education, health, scientific and technical activities. In 2017, there were 8,860 businesses in Bexley, providing some 73,000 jobs, representing a high rate of economic activity.

2.1.3 Local employment is concentrated in designated employment areas and in the borough's town centres. The employment areas are connected to the strategic road network, albeit unresilient, making them attractive to a range of industries. Bexley's five main town centres function well and their offer tends to meet local needs. Bexleyheath in particular offers a good range of uses including retail, offices, residential, leisure, entertainment (including sports and recreation), and tourism facilities.

2.1.4 Other towns in the borough provide less comparison goods and focus more on convenience goods and services for the local communities, with a smaller cultural and leisure offer than that of Bexleyheath. Overall, employment in Bexley's town centres felt the impact of the recession, although retail employment remained strong despite competition from out-of-town shopping centres such as Bluewater.

2.1.5 However, currently available evidence suggests that the borough faces some significant economic challenges, which need to be addressed if sustainable economic development is to be achieved. These are summarised below:

- relatively poor job growth in the borough, and slower growth in employment rates generally, with the number of Bexley residents in employment now increasing at a slower rate than the rest of London;
- a higher proportion of 18 to 24 year olds in Bexley claiming jobseekers allowance (JSA) than the London average and a higher proportion of Bexley's working age population being above the age of 50, compared to the London average;
- a low skilled population, with the percentage of Bexley's employed residents educated to NVQ level 2 or below (including no qualifications), significantly higher than the London average;
- a low proportion of highly skilled population (NVQ level 4 or above) by London standards, with, as a result, higher unemployment levels, and lower income levels when compared with the London average;
- very low public transport accessibility in many of Bexley's employment areas, which suffer from environmental issues such as poor air quality, flood risk and ground contamination; and,
- a consolidation of retail activity, with growth tending to concentrate into larger centres and out of town locations, leading to changes in function in some small and medium sized town centres such as Sidcup and Welling.

2.1.6 In September 2014, the Council consulted on a draft Economic Plan for the borough, and the main aims and objectives of that draft plan have been incorporated into the Growth Strategy. It has also been influenced by the Government's recently published Industrial Strategy, which sets out how productivity and earning power will be boosted across the country by focussing on five foundations of ideas, people, infrastructure, business environment and places.

Ambitions for economic development in Bexley

Economic ambition 1: Use growth to secure economic development

2.1.7 Plans must seek to facilitate high quality economic development. Growth is not just about building new homes but creating places where people want to live and work and where businesses would like to locate and grow. Bexley's unique location within London and the wider southeast provides huge potential to tap into the economic opportunities a global city has to offer. In this regard, the following outputs are pursued:

- a) ensure investment in infrastructure and growth supports the aims and ambitions of the economic strategy;
- b) seek a step change in connectivity to regional economic centres through investment in digital technology and strategic transport infrastructure such as an extension of Crossrail towards Ebbsfleet (C2E) as well as improved local connections;
- c) ensure Bexley's businesses benefit from the economic opportunities arising from the construction of homes, business premises and associated infrastructure; and,
- d) ensure Bexley's industrial areas and town centres are ready to meet the needs of new residents, workers and businesses by creating a network of flexible workspaces and leisure based destinations.

Economic ambition 2: Create a broader, more resilient and higher quality economic base

2.1.8 Although Bexley's traditional employment sectors will continue to play an important role, for the economy to grow and become more resilient a broader range of activities is needed. In this context, there are other sectors (such as low carbon goods and services, and food production) that are evident in the borough but which could evolve to capitalise upon new markets and higher value added sub-sectors.

2.1.9 The reintroduction of manufacturing activity into the borough and the development of a high class cultural offer, capitalising on the Thames Estuary Production Corridor, are priorities. The improved connectivity, which is the pre-requisite of high growth, together with the new diverse populations that this will attract to proposed new high-quality housing areas, will create some of the necessary conditions to enable this sectoral shift.

2.1.10 The Council is also interested in facilitating grass roots manufacturing called the Maker Movement. This is a trend in which individuals or groups create and market products that are manufactured and assembled outside traditional factory environments, combining technologies such as computation, electronics, robotics, and 3D printing with metalworking, woodworking, and other arts and crafts. The Maker Movement has led to the creation of a number of technology products and solutions by utilising the increasing amount of information available to individuals and the decreasing cost of electronic components. Products are often created within the circular economy, using unused, discarded or broken electronic, plastic, silicon or virtually any raw material and/or product from a computer-related device. Maker Movement activity can happen on a small scale and is therefore conducive to taking place in live/work environments and other places suitable for co-location. Bexley sees the emergence of the Maker Movement as the modern manifestation of the entrepreneurial spirit that characterised the borough in its industrial heyday.

2.1.11 As a result, the Council will look to create the right environment for those sectors that are already important to Bexley's economy, so they continue to prosper whilst also putting the necessary measures in place to make the borough attractive for new and diverse businesses. In this context, the following outputs will be pursued:

- a) maintain and increase the number of businesses in the borough;
- b) improve connectivity to and the environmental quality of employment areas;
- c) target businesses in growth sectors to relocate and cluster in the borough by providing state of the art accommodation including shared working facilities;
- d) exploit the location of world class performing art colleges in the borough and the Thames Estuary Production Corridor to develop and grow a cultural and creative arts offer in Bexley;
- e) promote Bexley's heritage assets and develop heritage tourism to support them; f) support enterprise amongst the local population and other entrepreneurial Londoners by modernising
- f) and relaunching its own innovation hub (currently The Thames Innovation Centre), encouraging co-living and co-working environments and innovative production and development spaces such as 'fab labs;'
- g) foster the right support mechanisms to enable new businesses to thrive;
- h) encourage Bexley businesses to provide permanent, long term opportunities along with good training and career prospects;
- i) better understand new communities in Bexley and how their ambitions to develop new businesses can be supported; and,
- j) where there are opportunities, signpost businesses effectively to ensure they have the best chance to succeed in Bexley.

Economic ambition 3: Make Bexley a thriving and ambitious place of opportunity through education and employment

2.1.12 Bexley is ideally placed to capitalise on the growing economy in London and the wider southeast region. If Bexley is to realise the benefits of this economic growth, the Council must

ensure it has a local workforce with the right skills to meet the demands of the labour market today and in the future.

2.1.13 As the labour market changes there will be increased demand for higher skills, whilst intermediate level jobs are projected to decline. Without raising the skills of the workforce, local people could become trapped in a diminishing pool of lower-skilled lower-paid work as supply overtakes demand.

2.1.14 To improve the skills of local people, the Council will work with partners to ensure the right education and training pathways are available to meet the needs of all learners, with clear progression routes to employment. This will need to be reinforced by high quality, impartial careers information and guidance that will shape demand and supply courses in response to the labour market.

2.1.15 The Council is also working to establish a Place and Making Institute in Thamesmead. This will be a campus where all involved in construction and place making come together to learn together from NVQ level 2 to post graduate study. The aim is that it will be home to a range of world class educational organisations working alongside businesses to train and upskill the people who will plan and build future homes and communities using the latest construction methods and technologies.

2.1.16 There will be other opportunities as well to develop enterprise and employability skills, to promote entrepreneurship and ensure people are 'work-ready' so they can access work, remain competitive and thrive economically.

2.1.17 With its partners, the Council will empower people to gain the right qualifications and skills for the jobs of today and tomorrow. A higher skilled population will drive growth and create greater economic prosperity for individuals and businesses, which will benefit the borough as a whole. In particular, the Place and Making Institute will offer academic and vocational qualifications for the development and construction sectors to meet industry demands and to deliver growth. The related outputs are:

- a) a learning offer fit for the future: high quality provision that is responsive and flexible to the changing needs of learners and employers, based on financially viable and sustainable delivery models, with clear progression routes to and within employment;
- b) a skilled workforce for strong and sustainable growth: creating greater economic prosperity for those who live, learn and earn in the borough;
- c) thriving businesses and enterprise: to increase innovation, productivity and job creation; and,
- d) a culture of continuous learning and development: signposting and supporting people to build, maintain and improve their skills to sustain relevance and competitiveness in a dynamic labour market.

Economic ambition 4: Enhance Bexley's image

2.1.18 Growth, and the investment it brings, provides a huge opportunity to realise economic development aspirations. It is critical a positive image of the place is secured to ensure the right kind of change occurs. This will involve marketing Bexley's unique attributes and why it is such a great place to live and work. Outputs include:

- a) developing a brand identity, across different media, focusing on the value of Bexley to new residents and investors and its place within a dynamic sub region;
- b) promoting Bexley's assets including heritage, leisure, culture and recreation and their value for residents and visitors;
- c) working with partners to provide clear messages and on-going information about Bexley; and,

- d) using brand ambassadors to promote Bexley on the bigger stage, engaging with businesses and representative bodies through international events.

Air quality

The London Plan (2016)

POLICY 5.7 Renewable energy

Strategic

A The Mayor seeks to increase the proportion of energy generated from renewable sources, and expects that the projections for installed renewable energy capacity outlined in the Climate Change Mitigation and Energy Strategy and in supplementary planning guidance will be achieved in London.

Planning decisions

B Within the framework of the energy hierarchy (see Policy 5.2), major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

LDF preparation

C Within LDFs boroughs should, and other agencies may wish to, develop more detailed policies and proposals to support the development of renewable energy in London – in particular, to identify broad areas where specific renewable energy technologies, including large scale systems and the large scale deployment of small scale systems, are appropriate. The identification of areas should be consistent with any guidelines and criteria outlined by the Mayor.

D All renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets, and to avoid any adverse impacts on air quality.

POLICY 7.14 Improving air quality

Strategic

A The Mayor recognises the importance of tackling air pollution and improving air quality to London's development and the health and wellbeing of its people. He will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimize public exposure to pollution.

Planning decisions

B Development proposals should:

a minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3)

b promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils' 'The control of dust and emissions from construction and demolition'

c be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

d ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, and that it is possible to put in place measures having clearly demonstrated equivalent air quality benefits, planning obligations or planning conditions should be used as appropriate to ensure this, whether on a scheme by scheme basis or through joint area based approaches

e where the development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations. Permission should only be granted if no adverse air quality impacts from the biomass boiler are identified

LDF preparation

C Boroughs should have policies that:

a seek reductions in levels of pollutants referred to in the Government's National Air Quality Strategy having regard to the Mayor's Air Quality Strategy

b take account of the findings of their Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated.

The London Plan (2018)

Policy SI1 Improving air quality

A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

1) development proposals should not:

a) lead to further deterioration of existing poor air quality

b) 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

c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality

d) create unacceptable risk of high levels of exposure to poor air quality.

2) 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. Particular care should be taken with developments that are 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.

3) masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development.

3A) major development proposals must be at least air quality neutral and be submitted with an Air Quality Assessment.

4) 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

6) development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.

Biodiversity

The London Plan (2016)

Policy 7.19 Biodiversity and access to nature

Strategic

A The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.

B Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10, 2.11, 2.12, 2.13, 2.14, 2.15, 2.16 and 2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25, 7.26 and 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Planning decisions

C Development Proposals should:

- a wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
- b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites
- c not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

D On Sites of Importance for Nature Conservation development proposals should:

- a give the highest protection to sites with existing or proposed international designations (1) (SACs, SPAs, Ramsar sites) and national designations(2) (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations (3)
- b give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance
- c give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

- 1 avoid adverse impact to the biodiversity interest
- 2 minimize impact and seek mitigation
- 3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

LDF preparation

F In their LDFs, Boroughs should:

- a use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.
- b identify areas deficient in accessible wildlife sites and seek opportunities to address them
- c include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets
- d ensure sites of European or National Nature Conservation Importance are clearly identified.
- e identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites

The London Plan (2018)

Policy G6 Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected

Historic environment

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.

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.

Transport

None

Ground conditions

None.

Townscape and visual

Thames Estuary Partnership's Thames Strategy East (2008)

Guidance for Reach 5: Halfway Reach and Erith Reach

Planning and design:

"RG5.2 The Belvedere Area Action Plan should seek to maximise opportunities to utilise the river for transport or marine support activities, particularly in associated with the proposed waste to energy plant.

RG5.4 Where appropriate enhance views from the river by establishing large scale woodland planting with species appropriate to a riverside location at Dagenham Dock, Fairview Industrial Park, Riverside Golf Club and the Belvedere.

RG5.5 Improve pedestrian and cycle routes through the Reach by... improving the Thames Path in front of the Crossness Sewage Works...

RG5.6 Ensure new industrial buildings address and relate well to the river and are of commensurate quality with the Ford Factory and the East London Sewage Incinerator."

Noise and vibration

The London Plan (2016)

Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes

Strategic

A The transport, spatial and design policies of this plan will be implemented in order to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy.

Planning decisions

B Development proposals should seek to manage noise by:

a avoiding significant adverse noise impacts on health and quality of life as a result of new development;

b 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 development or adding unduly to the costs and administrative burdens on existing businesses;

c improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);

d separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation;

e 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 the application of good acoustic design principles;

f having particular regard to the impact of aviation noise on noise sensitive development;

g promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

LDF preparation

C Boroughs and others with relevant responsibilities should have policies to:

a manage the impact of noise through the spatial distribution of noise making and noise sensitive uses;

b identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

The London Plan (2018)

Policy D13 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:

1) avoiding significant adverse noise impacts on health and quality of life

2) reflecting the Agent of Change principle as set out in Policy D12.

- 3) 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
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) 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
- 6) 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.

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

Flood risk and water resources

London Borough of Bexley Growth Strategy

Green and blue infrastructure 2: Supporting maintenance and enhancement of blue

Infrastructure

2.6.10 The watercourses in Bexley are an important aspect of the borough. Consideration must be given as to how they can be positively incorporated, maintained and enhanced as part of any future development plans.

2.6.11 The Belvedere and Slade Green growth areas, for example, offer opportunities to enhance the quality of the built and natural environment, through incorporation of the marsh dyke systems in development proposals. With careful design, the outlook onto these biodiversity rich areas will be enhanced.

2.6.12 Planning for sustainable drainage systems (SuDS) as an integral part of new development and associated opportunities for biodiversity, landscape and sense of place will be considered within design.

Green and blue infrastructure ambition 4: Protecting and enhancing biodiversity and strategic green corridors

2.6.19 Bexley has a rich network of Sites of importance for Nature Conservation (SINCs) across the borough and within the vicinity of the Growth Areas, many of which are home to legally protected species such as water voles, bats and reptiles. These sites include sites of importance to London such as the River Thames, Erith Marshes and Crayford Marshes.

2.6.20 Due regard will be given to the legal duties associated with protecting these important habitats and species, whilst taking opportunities to enhance them wherever possible. The hierarchy of avoid, minimise, compensate will be followed in relation to biodiversity.

2.6.21 Strategic green corridors, such as roadway verges and along railway lines and the southeast London green chain, are important for wildlife and are also located within or adjacent to the growth areas. The integrity and connectivity of these corridors will be enhanced where possible and the aims of relevant Biodiversity Action Plan targets will also be carefully considered.

2.6.22 Improving the recreational resource of green corridors such as the green chain, along with the integration of green spaces within and through development, for example, the incorporation of green roofs within building design, will add to the quality of the built environment, providing opportunities for health and wellbeing benefits to residents.

The London Plan (2016)

Policy 5.12 Flood risk management

Strategic

A The Mayor will work with all relevant agencies including the Environment Agency to address current and future flood issues and minimise risks in a sustainable and cost effective way.

Planning decisions

B Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk³⁴ over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 (TE2100 – see paragraph 5.55) and Catchment Flood Management Plans.

C Developments which are required to pass the Exceptions Test set out in the NPPF and the Technical Guidance will need to address flood resilient design and emergency planning by demonstrating that:

- a the development will remain safe and operational under flood conditions
- b a strategy of either safe evacuation and/or safely remaining in the building is followed under flood conditions
- c key services including electricity, water etc will continue to be provided under flood conditions
- d buildings are designed for quick recovery following a flood.

D Development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible should aim to be set back from the banks of watercourses and those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

Policy 5.13 Sustainable drainage

Planning decisions

A Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

- 1 store rainwater for later use
- 2 use infiltration techniques, such as porous surfaces in non-clay areas
- 3 attenuate rainwater in ponds or open water features for gradual release
- 4 attenuate rainwater by storing in tanks or sealed water features for gradual release
- 5 discharge rainwater direct to a watercourse
- 6 discharge rainwater to a surface water sewer/drain
- 7 discharge rainwater to the combined sewer.

Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.

Policy 5.14 Water quality and wastewater infrastructure

Strategic

A The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local planning authorities to:

a ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change

b protect and improve water quality having regard to the Thames River Basin Management Plan

Planning decisions

B Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and of the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.

C Development proposals to upgrade London's sewage (including sludge) treatment capacity should be supported provided they utilise best available techniques and energy capture.

D The development of the Thames Tideway Sewer Tunnels to address London's combined sewer overflows should be supported in principle.

Policy 7.17 Metropolitan Open Land

Strategic

A The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.

Planning decisions

B The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.

Policy 7.19 Biodiversity and access to nature

Policy wording set out above

Policy 7.29 The River Thames

Strategic

A The River Thames is a strategically important and iconic feature of London. This role should be protected and promoted.

Planning decisions

B Development proposals within the Thames Policy Area identified in LDFs should be consistent with the published Thames Strategy for the particular stretch of river concerned.

Draft New London Plan (2018)**Policy G1 Green infrastructure**

A London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C Development Plans and Opportunity Area Planning Frameworks should:

- 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.

Policy G3 Metropolitan Open Land

A Metropolitan Open Land (MOL) should be protected from inappropriate development:

- 1) development proposals that would harm MOL should be refused
- 2) boroughs should work with partners to enhance the quality and range of uses of MOL.

B The extension of MOL designations should be supported where appropriate.

C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.

Policy G4 Local green and open space

A Local green and open spaces should be protected.

B The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

D The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.

Policy G6 Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.

B In developing Development Plan policies, boroughs should:

- 1) use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board
- 2) 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
- 3) seek opportunities to create habitats that are of particular relevance and benefit in an urban context

4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations

5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.

C Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:

1) avoid adverse impact to the special biodiversity interest of the site

2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site

3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.

D Biodiversity enhancement should be considered from the start of the development process.

E Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites