

**From:** [REDACTED]  
**To:** [Riverside Energy Park](#); [Richard Wilkinson](#)  
**Subject:** RE: Riverside Energy Park Project - Responses to Written Representations  
**Date:** 07 July 2019 12:00:34  
**Attachments:** [Thamesmead Wetland Nature Park A vision for people and wildlife.docx](#)

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To the Examiner and Mr Richard Wilkinson – CORY REP.

My Reference 20021744

RE Applicants responses to Written Representations Vol 08 EN010093 Doc Ref 8.0214

I note under 3.3 Eversheds Sutherland (International) LLP on behalf of Thames Water Utilities Limited

**5.3.87** *The EB process seeks local sites first and the Applicant would welcome suggestions for sites and locations from TWUL and LBB to inform the site search process. Further information on the biodiversity net gain process is set out in the Biodiversity Accounting Report (8.02.09, REP2-060) and the Biodiversity Offset Delivery Framework (8.02.25).*

I would like to offer that attached document as a suggestion towards a site and location for Cory and LBB to consider.

At a meeting between representatives of Cory REP, Thames Water and myself on April 10<sup>th</sup> 2019 The Thamesmead Golf Centre was mentioned in passing and Ms Devon Christensen acknowledged such a project might fall within their Socio-community brief.

Notwithstanding this, I had already begun to draft a proposal for London Borough of Bexley which was submitted to them on June 19<sup>th</sup> 2019. I now attach the same document "Thamesmead Wetlands and Nature Park - A vision for Communities, wildlife and the environment" for your consideration and hopeful implementation either through the Environment Bank or directly with LBB and Peabody Estates.

Thank you,  
Kind regards  
Ralph Todd  
Reference 20021744

## **A vision for People, Wildlife, the Environment and Communities in and around Thamesview Golf Centre.**

A proposal by Ralph Todd, [REDACTED]

Tel: [REDACTED]

### **The Thamesmead Wetlands and Nature Park (working title only)**

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- Proposal
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- Benefits
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- My Background

#### **Introduction**

I do not know who to address this to so I am circulating widely.

As my Ward Councillors and Cabinet member Louie French will know I have serious concerns about the proposed Cory Riverside Energy Park (REP) which comprises a second waste incinerator, anaerobic digester and other infrastructure. I am concerned about the impact that this development (if approved) along with the already approved Cory Data Centres (15/02926/OUTM – July 2016) will have on the natural environment, wildlife and enjoyment of visitors to the relatively small remnant of the former Thames Marshes – notably Crossness Nature Reserve (CNR).

However, I wish to make what I hope you will see as a bold, exciting proposal, one you might take the trouble to read and consider please. I appreciate this is aspirational and not without many potential problems and legal issues that would have to be overcome – where there's a will there's a way. Peabody Estates, the owners, demonstrate wildlife and environmental education credentials at Tump 53.

#### **Summary:**

That the London Borough of Bexley requests (or negotiates with relevant parties – Peabody Estates/Cory) as mitigation for the approval of the Cory REP, the acquisition of the former Thamesview Golf Centre, golf range and club house located in Fairway drive, North Thamesmead. Then, in collaboration with Cory Riverside Energy, LB of Bexley, Thames Water, Peabody Estates and a number of other local communities and regional bodies (see list under Cory REP below) develop the site as a nature reserve and community open space.

If the REP does not receive approval this proposal still offers a bold, visionary possibility for Bexley Council to develop a nature reserve and community hub to equal Walthamstow Wetlands (North/East London), Thurrock Nature Park Essex (63,500 visitors in 2018), RSPB Rainham Reserve (29,345 visitors 2018/19) (both east London) and The London Wetland Centre, Barnes (West London) benefiting the local community, the natural environment, associated wildlife and Bexley Council. (See Appendix A for more details of each organisation)

#### **Cory Riverside Energy Park/Data Centres**

With the approval of the Data Centres, apart from a set of conditions, Cory was not required to undertake any significant mitigation for the loss of habitats (neither were they when the Riverside Resource Recovery Facility (RRRF) was approved). This seemed very unfair given the significant mitigation that Thames Water was required to undertake for the approval of the Sludge Powered Incinerator (SPG) and the expansion of the sewage treatment works. A full

time wardened 20ha Nature Reserve (designated a Local Nature reserve in 2004) was required under a S106 agreement.

Within the Environmental Statement (ES) of the Cory REP, there are references to mitigation and enhancing biodiversity through the Environment Bank – none of which really benefits wildlife or compensates for the increasing degradation of the Thames Marshes habitats and subsequent loss of wildlife – particularly in Bexley.

I am proposing in this document to LB of Bexley a bold and visionary approach to assist the Council in achieving some of their statutory requirements for enhancing biodiversity in line with its own policies.

I anticipate collaboration/consultation with a number of key stakeholders and interested parties (LB Bexley, Thames Water, Cory Riverside Energy/Environmental Trust, Peabody Estates, Friends of Crossness Nature Reserve, Thamesmead Community groups, Crossness Engines Trust, Thamesmead and Marsh Dyke Catchment Improvement Group, Thames 21, Lesnes Abbey Conservation Volunteers, London Wildlife Trust and/or Royal Society for Protection of Birds (RSPB)). There will I am sure be others.

### **Proposal:**

- Develop the long redundant Thamesview Golf Centre into a nature reserve and community open space. The site is Borough Grade 1 SINC and Metropolitan Open Land (Green Belt equivalent). *Policy 7.17 of the adopted London Plan relates to MOL and sets out that: The Mayor strongly supports the current extent of Metropolitan Open Land, its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. It also states that: 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.*

LB of Bexley “Preferred Policies” (PP) Document staunchly defends Green Belt in the Borough against change of land use – it demonstrated this recently turning down a development in North Cray Road.

- Develop the club house into an Environmental/Community Education Centre (with possible revenue generating retail/catering) along with community garden. Use the building inter alia as a green tech demonstrator to show retro-fitting/energy saving/living roof/solar etc. Bexley's Core Strategy sought to identify “a site” for zero carbon building in the Borough – this could be it. (I'm not aware of another). Especially important and relevant now that the Government has committed to net neutral by 2050.
- The Golf range could be returned to Open Mosaic Habitat to help offset the 2.4ha loss on the permitted Data Centre land, as well as the 0.46ha that will be lost to the REP. With the seasonal flooding that naturally occurs on the site some wetland creation to replicate the Crossness Nature Reserves West Paddock could potentially offset some of the indirect impacts that the Cory developments will have on the adjacent Crossness NR.
- Install a solar farm (make Cory pay for it along with their proposal for solar on the REP roof) on any open mosaic habitat created. This could help fund the ongoing costs.
- The golf course, already benefits from developing scrub, trees and open water ponds and hosts over 70 species of bird and interesting flora including the rare Golden Dock

## **Opportunities**

This bold vision offers the opportunity to link a large number of other local open spaces with many educational and health and wellbeing benefits.

- Cory offer educational opportunities – recycling and waste management.
- Thames Water - offer educational opportunities – water management and recycling.
- Crossness Engines Trust offer public and educational opportunities.
- Wildlife is already beginning to benefit from the neglected golf course which is linked to the Ridgeway, Crossness Nature Reserve and Crossness Southern Marshes SMINC and nearby Thamesmead Ecological Study area.
- Peabody Estates – Tump 53 offers wildlife and educational opportunities.
- Southmere Lake hosts a number of wildfowl, bat and dragonfly species and will, I understand, be incorporated into the Peabody Estates housing development scheme.
- Nearby is Lesnes Abbey/Woods with its own visitor facilities and wildlife/cultural attractions.
- The Queen Elizabeth Line extension to Abbey Wood offers the chance for this area to be known perhaps as the Thamesmead Wetlands/Nature Park: a South East London attraction rivalling that of West London's Wetland Centre and East London's Walthamstow Wetlands. It has the potential to attract the local community, LB of Bexley and neighbouring LB of Greenwich residents and visitors from further afield as do the aforementioned nature reserves with their multi thousand visitors per annum.

## **Benefits**

Much improved connectivity of open spaces (The Government Lawton report of 2010 made its primary objective – “bigger, better, more joined up” if the loss of wildlife and habitats were to be halted).

- Opportunities for local volunteering
- Community involvement including learning opportunities in nature conservation, gardening and people engagement
- Opportunities for Bexley students (and those from further afield) to learn about their own, direct environment – remember Rio 1992 – Local Agenda 21 – Think globally, act locally? Nearby schools could be involved from the very outset – giving them a close attachment and sense of ownership for the long term.
- Enhanced attractions for those walking the Green Chain Walk and Thames Path
- LB of Bexley Core Strategy and PP claim Bexley will protect and enhance biodiversity yet the planning committee has approved developments on higher grade SINC and candidate SINC (e.g. Erith Quarry, Crayford Rough, Crayford Landfill (Roxhill)) with further losses envisaged in the PP (Southmere Green, Southern Marsh Innovation scheme and worst of all – Slade Green by-pass cutting across Crayford Marsh). This proposal offers the opportunity for LB of Bexley to demonstrate its commitment to its own policy. If Cory Riverside is left to address this – the Environment Bank is likely to benefit areas outside the Borough.
- The north of the Borough is deemed deprived hence the Growth Strategy (PP) wants to focus new development in the north – more building/infrastructure etc. – so this is an opportunity to make it as “green and pleasant” as possible – why should Sidcup/Bexley/Bexleyheath have all the green open spaces? This would be the right scheme in the right place.
- LB of Bexley joins LB's of Waltham Forest, Havering, Richmond up Thames and Thurrock Council as one of the most high profile, far sighted local authorities, demonstrating its commitment to wildlife, nature, the environment, biodiversity, health and wellbeing and education. LB of Bexley already has exemplary recycling

credentials; perhaps it is time to add the conservation of the natural environment to that outstanding achievement.

At the Examiner's enquiry on Wednesday June 5<sup>th</sup> – Biodiversity Issue Specific Hearing Cory's "specialist representative" tried to argue that the proposed incinerator would not impact on the visual open space of the area – indeed they suggested it would be a "landmark feature of the skyline". Sadly they were able to quote Bexley Council as having the same opinion (mis-represented I hope as they didn't mention the negative impacts) but this is what Bexley Council stated in their Representation

- 11.12 "Local Impacts – Positive impacts - 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).

Surely Bexley Council would rather be known for its forward thinking approach to health and wellbeing, wildlife conservation and biodiversity improvements rather than yet another incinerator that provides a "focal point of skyline interest"?

### **Funding**

With the number of developments proposed within the PP (plus the Cory REP) there would be opportunities to secure funding through mitigation against as all developments must enhance/improve/increase biodiversity.

Or, along with ongoing management could be agreed with a third part (local wildlife trust/charity?), and/or set up a Community Trust with charitable status that could then benefit from grants available (for health, well-being, education, nature conservation).

My rationale for extracting funding for Thamesview site would be:

*National Planning Policy Framework – 170. Planning policies and decisions should contribute to and enhance the natural and local environment by a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) and d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*

### **My Background:**

I founded the RSPB Bexley Group in 1979 (now a membership of 3,500) and have had a lifelong passion for wildlife. Since moving to Bexley in 1974 I have marvelled at the wildlife and open spaces in the Borough. I have become increasingly concerned at the loss of certain habitats and species. I have undertaken surveys, led scores of walks and given dozens of talks all to help broaden an understanding and appreciation by both wildlife enthusiasts and the general public. I have researched and hold records of birds in the Borough since 1936 and am in the process of producing a summary of the 250+ species recorded and the sites most notable for seeing them. I was a founder member of the LA21 Bio-diversity partnership sitting on the Natural Environment Focus Group – writing three of the original Biodiversity Action Plans.

I am a regular contributor to a number of Bexley based wildlife associated Facebook pages/Web-sites where other local wildlife enthusiast post records of the vast array/variety of

species recorded in the borough and most notably along the Thames Marshes.

I have served on the national Council of RSPB and as a Trustee of Kent Wildlife Trust.

As representative of the Friends of Crossness Nature Reserve (FoCNR) I have been afforded face to face meetings with representatives of Cory Riverside Energy, their Ecological consultants (Peter Brett Associates) where I have been joined by and worked closely with the Thames Water CNR Warden/Biodiversity Team Manager. I also made the case against the Cory Data Centre on behalf of the FoCNR at the Planning Meeting when it was approved.

Ralph Todd – June 2019

**\*Appendix A** - other nature reserves/parks referred to:

**Rainham RSPB Reserve** Of the 29,345 visitors 85% (24,893) were fully paid up RSPB members, 11.5% (3,386) local residents of Havering and Thurrock who are offered free access to the reserve and 3.5% (1066) non-members/local residents. These are just the visitors who register at the reception desk, it does not include those walking the Thames Path to view the reserve, visiting the shop/café/nature garden.

90% travel within one hour and 60% with half an hour.

I can advise average spend per head in the shop and café.

There are 4,000 school children passing through the reserve on educational visits each year.

In addition to full time staff there are 100 volunteers registered to the reserve.

<https://www.rspb.org.uk/reserves-and-events/reserves-a-z/rainham-marshes/>

**Thurrock Nature Park** Essex Wildlife Trust supported by Cory Environmental Trust and local Authority. Open access through voluntary donation requested from non-members of the Trust. Shop and café. 63,000 visitors 2018/19 – 76,000 projected for 2019/20

<https://www.essexwt.org.uk/nature-reserves/thurrock-thameside>

**Walthamstow Wetlands** – Local Authority and Thames Water – open access, café/shop.

Visitor numbers to follow <https://walthamstowwetlands.com/>

**London Wetland Centre** – Wildfowl and Wetland Trust. Membership organisation with concessions for local residents. Visitor numbers to follow.

<https://www.wwt.org.uk/wetland-centres/london/>