

Friends of Crossness Nature Reserve Ref. 20021744

Riverside Energy Park Examination – EN010093

A response on behalf of Friends of Crossness Nature Reserve relating to

“The Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules
2010 – Rule 17

Submitted by Deadline 4 – 19th July 2019.

The Examiner states: “Application by Cory Riverside Energy for an Order Granting
Development Consent for the Riverside Energy Park Changes to the Application

On 20 May I received details of changes to the application. These are set out in two
documents: Environmental Statement Supplementary Report; and Electrical Connection
Progress Report. The documents setting out these changes can be found as REP2-044 and
REP2-058 in the Examination Library for this Proposed “.

REP2-044

Friends of Crossness Nature Reserve (FoCNR) wish to comment specifically on “*The
Environmental Statement Supplementary Report sets out two changes to the application: a)
The removal of plots 02/53 and 02/55 from the Main Temporary Possession Construction
Compound and the use of plots 02/43, 02/44, 02/48 and 02/49 as part of the Main Temporary
Possession Construction Compound. The use of plots 02/43, 02/44, 02/48 and 02/49 had
already been included in the original application and assessed in the Environmental
Statement.*”

Environmental Statement Supplementary report EN010083 volume number 06 document 6.6
basically sets out the removal of 02/53 and 02/55 from the main temporary construction
compound and replaces them with plots 02/43, 02/44 and 02/48, 02/49 (also known as the
Data Centre site) for use as part of the main temporary construction compound.

2.2.2 notes that plots “are identified of at least regional importance for invertebrates as well
as nesting by red-listed birds”

The FoCNR objected to the Data Centre on the grounds of its importance of the habitats for
wildlife including red-listed birds, skylark, little ringed and ringed plover plus invertebrates –
shrill carder bee amongst them. The application was approved subject to conditions being
met.

This latest change of use, to temporary construction site further lengthens the period of time
the site will be disrupted (up to five years if both projects are finally approved and go ahead)
with the consequence that what remains of valuable wildlife (e.g. skylark) will almost
certainly have deserted the site (there is no suitable alternative habitat nearby). Given the
time allocated as temporary construction site (for the REP) then the construction of the Data
Centres we strongly object to this change of use. Whilst we believed using plots 02/53 and
02/55 would have some impact on the adjacent nature reserve (one of our objections) this
work, taking place as we were led to believe in parallel with the Data Centre construction
would have had less impact overall and within a shorter time scale than what is now
proposed.

We understood from the original application, construction of the Data Centres would be 18 - 24 months, given the timescale for the REP is c36 months this represents considerable disruption (up to five years) to visitors to Crossness Nature reserve and potential disturbance to wildlife on the adjacent reserve.

It is unclear how the applicant intends to access the four plots (two Data Centre sites) but we would strongly object to it being via the access road to the nature reserve (which I believe is Thames Water land). The number of HGV and staff vehicle movements suggests even greater disturbance not to mention health and safety issues.

We would ask that London Borough of Bexley, being the approving authority for the Data Centres and also the authority for approving conditions for both REP and Data Centre, should instigate independent ecological surveys at appropriate times of year to assess the impact of this alteration and request appropriate mitigation. No meaningful wildlife habitat mitigation measures were required under the Data Centre approval, given these plots are included within the REP application, we suggest a full assessment is undertaken with proper, full scale habitat reinstatement close to the Crossness Nature Reserve – perhaps the nearby Thamesmead Golf Course.

We are particularly concerned that Cory's proposal would allow for any mitigation/compensation to be delivered outside of the Borough boundary. We would very much like Bexley Council's Core Strategy policy of protecting and enhancing biodiversity in our own area be effectively implemented.

Friends of Crossness Nature Reserve, object to this change and the subsequent long term loss of open mosaic habitats (plots 02/43, 02/44 and 02/48, 02/49) and prolonged disruption to the adjacent nature reserve and enjoyment of visitors to that reserve.

Ralph Todd
On behalf of Friends of Crossness Nature Reserve
18th July 2019