

# Riverside Energy Park

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## Applicant's response to Friends of Crossness Deadline 4 Submission

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# 1 Applicant's response to Friends of Crossness Nature Reserve (FoCNR) Deadline 4 Submission

## 1.1 Introduction

1.1.1 This document provides a response to the two documents submitted by Ralph Todd on behalf of Friends of Crossness Nature Reserve (FoCNR) at Deadline 4:

- Response to "Applicant's response to Written Representation" document presented at Deadline 3; and
- 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".

1.1.2 The Applicant's responses to these documents are detailed below in **Sections 1.2** and **1.3** respectively.

## 1.2 Response to "Applicant's response to Written Representation" document presented at Deadline 3

1.2.1 This section sets out the Applicant's response to the following topics in the submission:

- Design – solar panels – bio-solar green roof;
- Construction and operational noise;
- Species general;
- Townscape and Visual Impacts Assessment; and
- Compensation/mitigation.

1.2.1 The above matters are addressed in order below.

### Design – solar panels – bio-solar green roof

1.2.2 While the Applicant notes the Respondent's preference for the appearance of a curved roof design (rather than the stepped roof design), the Applicant's stepped building design was determined through taking a number of key considerations into account following design evolution and a public/stakeholder consultation process, as set out in the **Design and Access Statement (7.3, APP-104)**. Key design considerations included renewable energy (maximising solar generation), transportation (access to the existing jetty connection), visual impact (minimising height and massing), and construction and building materials (avoiding inefficient use of internal space and minimising use of building materials).

1.2.3 The stepped roof design will provide opportunities for large areas of photovoltaic panels on south facing roofs; accommodating the maximum number of photovoltaic panels and maximising renewable energy; and

minimises vertical heights and massing, thus reducing the impact on the River Thames and Crossness Local Nature Reserve (LNR), including any impacts from shading.

- 1.2.4 As illustrated in **Section 6.1 Design and Access Statement (7.3, APP-104)** and re-provided below (**Figure 1.1**), the main REP building which includes the stepped roof design, reduces the overall height and mass of the buildings thus mitigating anticipated visual and shadowing effects to important neighbours providing more 'open sky' than the curved roof design.

RRRF is shown dotted in all images.

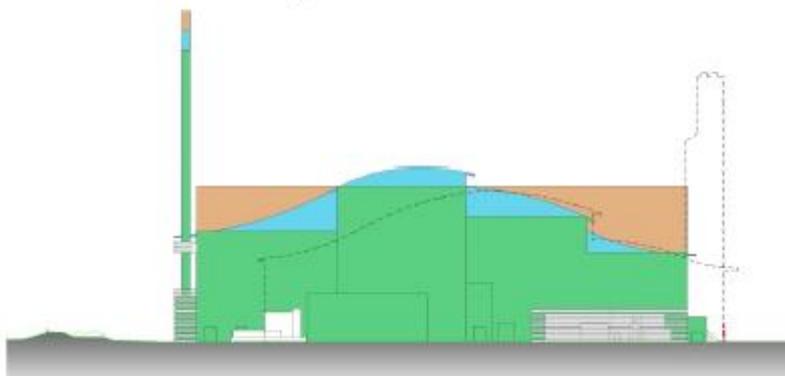


Figure 1.1 Illustrative Scale and Mass Comparison

- 1.2.5 The Applicant is not “*easily claiming*” safety, maintenance and cost of structural uplift as reasons not to include green or bio solar roofs. The Applicant confirms that green roofs and bio-solar roofs will be explored at the detailed design phase. Consideration of this matter at that phase of the Proposed Development is appropriate to ensure that green roofs or bio-solar roofs can be delivered in harmony with the final design of the building, including successful integration of the structural and maintenance requirements of such systems within and under solar panels. Safety for access is included in the design regardless of the final roof design.
- 1.2.6 As is common with large infrastructure projects, the detailed structural design process will not progress until the DCO is granted. The Applicant has submitted a **Design Principles (7.4, APP-105)** document which sets out how the REP design process will progress. The detailed design phase is secured through **Requirement 2** of the **Draft Development Consent Order (dDCO) (3.1, Rev 3)** and subject to the approval by the London Borough of Bexley (LBB).
- 1.2.7 In response to FoCNR comment on feasibility of green roofs or bio-solar roofs, the Applicant is not aware at this stage of the design process if green roofs or bio solar roofs are feasible or viable therefore the feasibility of these aspects will be determined at the detailed design phase. If feasible and viable green roofs or bio-solar roofs will be included in the final **Biodiversity and Landscape Mitigation Strategy** as secured through **Requirement 5** of the **dDCO (3.1, Rev 3)**.

- 1.2.8 The Applicant disputes the notion that the assessment was conducted by “a person sitting at a desk with no appreciation of the natural environment.” The Applicant’s Townscape and Visual Impact Assessment (TVIA) was undertaken by experienced professionals through conducting desk and field-based work. The capability of the team, in compliance with Regulation 14 (4) of The Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017 (as amended) (the Infrastructure EIA Regulations 2017) is set out at **Paragraph A.2.1, Appendix A.2 EIA Project Team Qualifications and Experience** of the **ES (6.3, APP-063)**. The Regulations require:
- “Developers to ensure that the environmental statement is prepared by competent experts; and
  - The Environmental Statement (ES) to be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts”.
- 1.2.9 The TVIA was undertaken in accordance with the guidance documents set out at **Paragraph 7.5.13 Appendix A.1 Scoping Opinion and Removal of River Works Notes** of the **ES (6.3, APP-062)**. This consisted of an initial step of desk based data collection followed by field work comprising photographic recording and visual surveys (**Section 3.1 Appendix E.1 Townscape and Visual Impacts Assessment Methodology** of the **ES (6.3, APP-072)**). The methodology for the TVIA was agreed at the EIA Scoping Stage (**Table 7.5.2, Appendix A.1 Scoping Opinion and Removal of River Works Notes** of the **ES (6.3, APP-062)**).
- 1.2.10 The TVIA is based on, inter alia, an understanding of the environment in which the Proposed Development resides, how the design of the building and stack(s) would be seen as a new feature in the context of other industrial buildings, and other existing vertical elements such as wind turbines and other stacks. The design seeks to take into account adjacent land uses and the existing industrial townscape character including acknowledging the existence of other stepped and flat roofed buildings in the area.
- 1.2.11 The Applicant progressed the proposals in accordance with **Section 4.5 of the Overarching National Policy Statement for Energy (EN-1) (NPS EN-1)**, including consideration of functionality, sustainability, efficient use of resources and energy and, as far as possible, an appearance that demonstrates good aesthetic. The Applicant’s approach to consulting upon multiple building forms, identifying a preference for a stepped design and ultimately choosing this as the building form was accepted by the Secretary of State at submission, in accordance with Paragraph 4.5.4 of NPS EN-1. Having considered and chosen the fundamental form of the building in the pre-application phase, the Applicant considers that LBB is best placed as the determining authority to ensure that the detailed design explores the opportunities available for biodiversity and in other respects.

## Construction and operational noise

- 1.2.12 The Applicant has assessed the potential cumulative effects of the Proposed Development including the consented Data Centre, in **Sections 6.10, 7.10, 8.10, 9.10, 11.10, 12.10, 13.10 and 14.10** of **ES Chapter 6-14**, as well as the combined interaction of effects from REP in **Table 16.1 Chapter 16 Summary of Findings and In-combination Effects** of the **ES (6.1, APP-053)** which concluded No Significant adverse effects.
- 1.2.13 The FoCNR's submission claims that the assessment was undertaken via a desktop analysis with a minimal number of site visits. However, the assessment was undertaken in accordance with the guidance set out in **Paragraph 7.7.22 Appendix A.1 Scoping Opinion and Removal of River Works Notes** of the **ES (6.3, APP-062)** which is in compliance with Regulation 14 (4) of The Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017 (as amended) (the Infrastructure EIA Regulations 2017) (as stated at **Paragraph A.2.1, Appendix A.2 EIA Project Team Qualifications and Experience** of the **ES (6.3, APP-063)**).
- 1.2.14 The ecological surveys described in **Paragraph 11.5.10 Chapter 11 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)** were undertaken to inform the assessment in the EIA, the scope of which was established through consultation with statutory consultees including LBB and Natural England.
- 1.2.15 Furthermore, the noise modelling and assessments were undertaken at a location in Crossness LNR, near to the south west corner of the West Paddock (see **ES Figures 11.10 (6.2, APP-061)**). This central location was chosen to demonstrate predicted noise levels at a representative location within the LNR, which would be relevant to a number of different ecological receptors in different locations within the LNR. The calculations of construction noise were undertaken in accordance with BS5228:2009 'Code of practice for noise and vibration control on construction and open sites'. The modelling identified a change in sound level at the representative location within Crossness LNR during construction, from 52dB to 62dB. Sound levels in the region of 50-60dB are typical of sound levels in most urban locations (including parks) situated in the vicinity of transportation infrastructure. During baseline surveys, lapwings were identified as breeding in the West Paddock. It is considered that if the habitat is currently suitable for breeding lapwing, as it is in the West Paddock, then lapwing will be resilient to reasonable levels of disturbance predicted as a result of construction.
- 1.2.16 As described in **Paragraph 11.9.43 Chapter 11 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)** noise levels were also monitored and modelled with respect to existing and predicted noise levels during operation of REP within Crossness LNR to indicate how noise impacts could affect breeding birds. The results show minor increases of 3 dB during daytime operation and 6 dB during night-time operation. These modest increases on the breeding bird population of Local importance were assessed as Not Significant.

- 1.2.17 In addition to the surveys commissioned by the Applicant, species data was provided by Thames Water for Crossness LNR covering the period 2016-2018, and ecological field surveys undertaken to inform the planning application for the Data Centre site (15/02926/OUTM) were also reviewed. The survey work undertaken by the Applicant and the data provided by Thames Water has ensured that a robust and appropriate assessment has been conducted and concludes at **Table 11.11 Chapter 11 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)** that the impacts are Not Significant.
- 1.2.18 Given the findings summarised above, the Applicant considers that the assessment of Not Significant effects on Crossness LNR from Construction/Operation Noise is appropriate in light of the low magnitude, temporary and localised effects to the REP site and its immediate surroundings. Given these findings, there is no reason why the aspirations of the FoCNR group to increase the biodiversity of the Nature Reserve would be adversely affected in the long-term by construction or operational noise.
- 1.2.19 Furthermore, in respect of construction, as secured through the **Outline Biodiversity and Landscape Mitigation Strategy (OBLMS) (REP3-014)**, the Applicant is required to set out measures which will be used during construction to avoid or minimise potential direct or indirect effects, including timing of clearance works to avoid the core bird nesting season if they might be subject to significant adverse effects.
- 1.2.20 The Applicant has previously requested from TWUL a copy of the Second Schedule to the referenced Section 106, however this has not yet been supplied to the Applicant or the Examining Authority, and TWUL have confirmed that they are unlikely to be able to provide a copy. The Applicant therefore remains in a position of being unable to comment on the objectives which TWUL raise. The Applicant is therefore also seeking a copy of the Second Schedule via LBB.
- 1.2.21 As stated in **Paragraph 1.2.9** of the **Applicant's response to Thames Water's Written Summary of Oral Submissions made at the hearings (8.02.39, REP4-018)**, section 3 of the Water Industry Act 1991 applies to proposals being promoted by TWUL, not by third parties. In relation to such proposals relating to TWUL's undertaking, TWUL is under a duty to further the conservation and enhancement of natural beauty and the conservation of flora and fauna. Accordingly, the Applicant will not place TWUL in breach of section 3 or section 5 of the Water Industry Act 1991 (which relates to giving practical guidance to relevant undertakers with respect to any of the matters under section 3).

### Species general

- 1.2.22 The cumulative assessment for terrestrial biodiversity as set out in **Section 11.10 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)**, concludes no cumulative significant adverse effects are anticipated. The Applicant acknowledges that the stacks will provide potential additional avian predator perches, however no significant effect has been identified resulting from avian

predation of specific species and the addition of perches is set in the context of existing surrounding perches. In the absence of evidence from FoCNR of any significant effect, the Applicant considers any effect is Not Significant and is outweighed by the benefits of the proposal in meeting the urgent need for new energy infrastructure, among other matters set out in the **Project Benefits Report (7.2, APP-103)**.

### **Town and Visual Impact Assessment**

- 1.2.23 The TVIA was undertaken as part of the EIA by a competent expert with over 20 years' experience, in compliance with Regulation 14 (4) of the Infrastructure EIA Regulations 2017 (as stated at **Paragraph A.2.1, Appendix A.2 EIA Project Team Qualifications and Experience** of the **ES (6.3, APP-063)**). The assessment included site visits and assessments of Zones of Theoretical Visibility (ZTV) were also used for more distant receptors.
- 1.2.24 As part of the EIA Scoping stage, viewpoint locations were agreed with statutory consultees (including LBB, GLA) and are set out in **Table 7.5.2, Appendix A.1 Scoping Opinion and Removal of River Works Notes** of the **ES (6.3, APP-062)**, which outlines proposed viewpoint locations for the assessment of visual effects based upon people's views and visual amenity. Long distance as well as short distance views were considered in order to provide a robust assessment. The viewpoints were selected to include consideration of visual effects of the Proposed Development upon the Crossness Conservation Area, listed buildings and their settings. Local authority consultation in relation to the selection of viewpoints is set out in **Table 9.2 Chapter 9 Townscape and Visual Assessment** of the **ES (6.1, REP2-021)**.
- 1.2.25 As set out in previous responses, whilst the Applicant accepts that there will be a change to the skyline and some Moderate impacts to viewpoints within Crossness LNR (namely, VP2), the Proposed Development is set within an existing industrial area with a character of industrial development based around the river and so would be consistent with this setting. Embedded mitigation (as set out in **Paragraph 9.8.2 Chapter 9 Townscape and Visual Assessment** of the **ES (6.1, REP2-021)**) would acknowledge adjacent land uses and existing townscape character.
- 1.2.26 Furthermore, Crossness LNR is a nature reserve and green space set within an existing active urban area and existing views out from the LNR to the east already look upon existing industrial buildings and structures. The LNR clearly provides 'green relief' from the existing surrounding urban context and the associated noise and activity of this area. The Proposed Development, if consented, would not alter that 'green relief' function within Crossness LNR. As described in **Paragraph 5.3.31** in the **Applicant's responses to Written Representations (8.02.14, REP3-022)**, it is likely that any visitors would be focussed on undertaking ecologically related activities within the nature reserve itself rather than on the views of surrounding built development. Whilst there would be some reduction of openness when looking northwards, due to new built form, openness is maintained and the Crossness LNR would not be

enclosed. This includes taking into consideration the consented Data Centre, which is located to the east of Crossness LNR.

1.2.27 In respect of openness of Metropolitan Open Land (MOL), the Applicant has submitted a note on MOL at Deadline 4 titled **Metropolitan Open Land – Analysis of whether the policy on Green Belt in the National Policy Statement applies to Metropolitan Open Land in respect of the Proposed Development (8.02.41, REP4-020)**. The Applicant's position is that the London Plan does not substantially alter the application of NPS EN-1, which applies to Green Belt only and not MOL, such that the provisions in relation to Green Belt in the NPS do not apply. MOL clips the edge of the plots of the Main Temporary Construction Compound (plots 02/43, 02/44, 02/48, 02/49, 02/51 and 02/52). However, given the location of the MOL on these plots, there would be no buildings, or indeed any buildings. Accordingly, the works would involve simply hard standing which is used for parking, and assembly/fabrication areas, all of which would be classed as "engineering operations"<sup>1</sup>, that would "*preserve the openness*" of the MOL and would "*not conflict with the purposes of including land within*" the MOL. The Applicant contends that even if the London Plan provision were applied in full, the works therefore comprise engineering operations or other forms that do not conflict with Green Belt policy as set out in the National Planning Policy Framework and London Plan.

1.2.28 Furthermore, the **Analysis of Metropolitan Open Land (MOL) in respect of the Proposed Development (8.02.41, REP4-020)** also addresses the potential indirect effects to the MOL arising from the development at Section 1.5, identifying that the relevant Secretary of State (in accordance with NPS EN-1) must consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape. The note sets out the process, contained with the **Design and Access Statement (7.3, APP-104)**, to minimise environmental effects. Furthermore, the EIA found that effects on designated open spaces (**Table 9.8 Chapter 9 Townscape and Visual Impact Assessment (6.1, REP2-021)**) would be minor and therefore Not Significant.

### Compensation/mitigation

1.2.29 As discussed in Paragraph 1.3.1 above, the Applicant will explore the potential use of green roofs or bio-solar roofs at the detailed design phase. This is to ensure green roofs or bio-solar roofs are feasible and can be delivered in harmony with the design of the main REP building.

1.2.30 In respect of habitat creation within the Crossness LNR, the Applicant has submitted the **Biodiversity Accounting Report (8.02.09, REP2-060)** and the Applicant has commenced the site selection process which is discussed in the

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<sup>1</sup> Roman Catholic Diocese of Southwark and Regal point Homes (WW) Ltd v Bromley LBC [2016] P.A.D. 31

**Update on the Environment Bank Site Selection Progress (8.02.53)** submitted at Deadline 5. The Applicant is focussed on exploring and securing local opportunities first through its ongoing discussions with LBB. If improvement or enhancement measures are available and deliverable through the Crossness LNR or other local sites, then these would contribute directly to local biodiversity net gain. Notwithstanding this, the Applicant considers the other enhancement proposals put forward by FoCNR in respect of provision of nest boxes or similar will be explored at the detailed design stage, although these measures are not necessary in planning terms to make the development acceptable.

1.2.31 The Applicant considers that the approval of the final Biodiversity and Landscape Mitigation Strategy by LBB is an appropriate mechanism to ensure that strong oversight is provided of the site selection process and to confirm that a full suite of local sites is considered first and foremost by the Applicant. The biodiversity metric site search process is progressing and LBB is being involved from the outset which is discussed in the **Update on the Environment Bank Site Selection Progress (8.02.53)**.

1.2.32 FoCNR references Policy SP12 from the LBB's 'Preferred approaches to planning policies and land-use designations' document, which is the same as policy as CS 18 in LBB's adopted Core Strategy 2012. **Section 5 of the Planning Statement (7.1, APP-102)** clearly demonstrates how the Proposed Development is compliant with regional planning policy and guidance (including the adopted London Plan, the draft New London Plan and the London Environment Strategy), in addition to other local development plans covering LBB, KCC and DBC. The policies and guidance documents identified in the Planning Statement have been taken into consideration throughout the design and assessment work and in the preparation of the DCO Application and related documents. As discussed above, the Applicant is focussed on exploring and securing local opportunities first through its ongoing discussions with LBB. If improvement or enhancement measures are available and deliverable through the Crossness LNR or other local sites, then these would contribute directly to local biodiversity net gain, as set out in the **Biodiversity Accounting Report (8.02.09, REP2-060)**.

### **1.3 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"**

1.3.1 This section sets out the Applicant's response to the following in relation to the above document:

- Importance of Data Centre for habitats;
- Consecutive construction impacts;
- Access to the Data Centre site; and
- Compensation and mitigation.

1.3.2 The above matters are addressed in order below.

### Importance of data centre for habitats

- 1.3.3 FoCNR objects to the use of the Data Centre site on the ground of its importance for habitats. As stated in the **Environmental Statement Supplementary Report (6.6, REP2-044)**, the Data Centre site was included in the field surveys and terrestrial biodiversity assessment undertaken as part of the EIA for the Proposed Development. This is stated in **Table 11.2: Chapter 11 Terrestrial Biodiversity** of the **ES (6.1, REP2-023)**; *“Effects to habitats and species within the Data Centre fields and the Main Construction Compound have been fully considered within the ES”*.
- 1.3.4 As the LBB has granted consent for the Data Centre site subject to planning conditions the principle of development on this site is established and accepted. The use of the Data Centre site as the Main Temporary Construction Compound will be subject to stringent environmental controls through the **CoCP** and **OBLMS** which are secured through **Requirement 11** and **5**, respectively of the **dDCO (3.1, Rev 3)**. Therefore, the assessment concluded that there would be no significant adverse impacts to terrestrial biodiversity receptors including wildlife such as red-listed birds, skylarks, little ringed and ringed plover plus invertebrates e.g. the shrill carder bee.

### Consecutive construction impacts

- 1.3.5 The assessment set out in the ES and the **Environmental Statement Supplementary Report (6.6, REP2-044)**, does not rely on the Data Centre and Main Temporary Construction Compound being undertaken consecutively to minimise effects. The **Environmental Statement Supplementary Report (6.6, REP2-044)**, considered two indicative scenarios (Scenario 1, the use of the Data Centre site as a whole being used as part of the Main Temporary Construction Compound and Scenario 2, whereby the southern parcel of the Data Centre site will be used as part of the Main Temporary Construction Compound whilst construction of the Data Centre is commenced on the northern parcel) and found that the effects in both were Not Significant.
- 1.3.6 The construction of REP will be controlled through the **CoCP** and **OBLMS** which are secured through **Requirement 11** and **5**, respectively of the **dDCO (3.1, Rev 3)** submitted at Deadline 5.
- 1.3.7 FoCNR provides no reasoned basis for claiming that effects arising from the revised extent of the Main Temporary Construction Compound will give rise to *“considerable disruption (up to five years)”* and this is not related to the EIA findings (which the Applicant found to be Not Significant in all respects in the **Environmental Statement Supplementary Report (6.6, REP2-0440)**).
- 1.3.8 The use of the Data Centre site as part of the Main Temporary Construction Compound is not considered major construction and activities on the Main Temporary Construction Compound (including the Data Centre site) are in keeping with the industrial character of the area. Visitors to Crossness LNR would be focused on undertaking ecologically related activities within the nature reserve itself rather than on views of the surrounding area.

- 1.3.9 Furthermore, as stated in **Table 2.1** of the **Environmental Statement Supplementary Report (6.6, REP2-0440)** the number of HGV's will not change due to the use of the Data Centre site as part of the Main Temporary Construction Compound and therefore the impact remains as specified at **Paragraph 6.12.2 Chapter 6 Transport** of the **ES (6.1, REP2-017)** which resulted in a Minor adverse / Negligible effect. If the Data Centre is built concurrently to REP, then HGVs would increase marginally (approximately 4 HGVs per hour) which, in EIA terms, does not result in a significant impact or considerable disruption, nor would there be a significant impact in terms of noise from increased road movements (**Table 3.1 Environmental Statement Supplementary Report (6.6, REP2-044)**).
- 1.3.10 In respect of proximity to Crossness LNR, the Application Boundary was not amended in respect of inclusion of the Data Centre sites, since these were already present within the original DCO Application. Whilst these areas are now included in respect of Works items associated with the Main Temporary Construction Compound, they were considered as part of the original DCO Application (Work No. 7). The Applicant maintains that, although the works differ in activity and duration, no likely significant adverse effects have been identified as a result of the change of use of the Data Centre site. The original submitted application did not rely on the Data Centre works being undertaken concurrently, such that potential overall construction period of works in the vicinity of Crossness LNR has not increased.
- 1.3.11 Notwithstanding the above, The Applicant proposes further mitigation measures below, which are over and above those that are required to mitigate the effects of the Proposed Development. These additional measures would further reduce any potential disturbance and any potential impacts during the construction period to Crossness LNR. As such, the following measures have been included in the updated **Outline CoCP (7.5, Rev 3)** submitted at Deadline 5:
- The use of printed hoarding depicting vegetation and/or trees to be erected around the perimeter of the Data Centre site. This will provide further visual screening by giving the impression of continued vegetative landscape. The solid hoarding will bring the dual benefit to provide further noise reduction and dust control at the boundary to Crossness Local Nature Reserve; and
  - Specified noise attenuating barriers would be erected around the perimeter of the Data Centre site closest to Crossness Local Nature Reserve where any noisy works are to be undertaken as part of the Main Temporary Construction Compound, this will result in further noise reduction at the boundary to Crossness Local Nature Reserve.

### Access to the Data Centre site

1.3.12 The Applicant confirms that the TWUL access road is not included in the Application Boundary, save for a parcel of CRE group land held at the entrance and over which TWUL is granted rights of access. The Applicant confirms that it does not intend to utilise this route for access from the public highway to the compound areas and that separate access or accesses would be created from Norman Road (**Sheet 2 Access and Rights of Way Plans (2.3 REP2-005)**). The Applicant also confirms that there is no intention to close or refuse access and that any disruption from construction of the Proposed Development would be minimised through the liaison measures set out in the **Outline Construction Traffic Management Plan (CTMP) (Appendix L of Appendix B.1 Transport Assessment to the ES (6.3, Rev 4))** at Deadline 5. **Table 2.1 Environmental Statement Supplementary Report (6.6, REP2-044)** refers to proposals to take vehicles across the TWUL Road between the parts of the Main Temporary Construction Compound on the "Data Centre" sites. The Applicant confirms that this no longer forms part of the Application.

### Compensation and mitigation

1.3.13 It is matter for LBB to decide whether or not it wishes to arrange and fund any separate ecological surveys in addition to those already carried out. However, the Applicant would reiterate that it has undertaken a comprehensive range of surveys, agreed at the EIA Scoping stage with statutory bodies, including LBB. Notwithstanding this, it is noted that species data were provided by Thames Water for Crossness LNR covering the period 2016-2018. Furthermore, the ecological field surveys undertaken to inform the planning application for the Data Centre site (15/02926/OUTM) were also reviewed by the Applicant's ecological team in order to ensure a robust assessment. The survey work undertaken by the Applicant and the data provided by Thames Water has ensured that a robust and appropriate assessment has been conducted and concludes at **Table 11.11 Chapter 11 Terrestrial Biodiversity of the ES (6.1, REP2-023)**, Not Significant.

1.3.14 The Applicant is progressing discussions with LBB and others to consider local sites for biodiversity offsetting, areas such as the Thamesmead Golf Course will be considered during this process. As discussed above, the Applicant is focussed on exploring and securing local opportunities first through its ongoing discussions with LBB and LBB have been selected at the initial target area to ensure the offsetting requirement is delivered as close to the Proposed Development as possible. If there are limited sites identified within LBB, the target area will be extended to also include neighbouring boroughs and areas. If improvement or enhancement measures are available and deliverable through the Crossness LNR or other local sites, then these would contribute directly to local biodiversity net gain, as set out in the **Biodiversity Accounting Report (8.02.09, REP2-060)**. The latest update on the Environment Bank site selection is provided in the **Update on Environment Bank Site Selection Progress (8.02.53)** submitted at Deadline 5.