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Dear Sir or Madam,

I would like to raise some points relating to the Applicants Response to Representation.

1. MOL - There appears to be an attempt to argue in the Applicants Response to Representations 3.2.22 and 23 that it is possible there may not be any impact on the openness of the MOL by building a gigantic factory on it. Appearing to accept the weakness of their own argument, by 3.4.25 , Cory resort to their equally weak argument that there “is no alternative” as opposed to no loss of openness. Cory also appear to be confused between purpose of MOL and purpose of Green belt since in 3.4.28 they seem to be referring to MOL as being used to stop Urban Sprawl. This is incorrect. Although the strength of protection is the same, the definition and purpose are not.

It would be difficult to refute, due to the strength of Government support for Carbon Capture that there are “very special circumstances” however this means that building on MOL CAN be considered , it does not mean that the value of the MOL is automatically dismissed, which seems to be Cory’s inherent assumption.

2. Mitigation Site- Cory persist in referring to the existing open land near to the Nature Reserve as “mitigation land”. It is not. It is existing valuable habitat and this description is misleading. No new land for nature is involved. One type of habitat will be destroyed to gain another. In my opinion this is just a cover for a “land grab” by Cory for the whole area that would be otherwise out of their grasp. At no point have they considered real mitigation land i.e. purchasing an alternative brown field site and returning it to nature. The addition of car parking and a footpath running through the site are not beneficial to habitats or endangered species.
3. Gypsy grazing land - I found Cory’s comments in Response to Relevant Representations 4.1.41 offensive. The fact there is no monetizing of the grazing but undertake this for enjoyment and passing down of a traditional activity to new generations does not lessen cultural importance.
4. Alternative Sites – I was disappointed to see no response to the point I raised regarding the site chosen not in fact being better than other sites considered in the Terrestrial Site Alternatives if assessed impartially. Cost and timescale are not Optioneering Principles and arguments relating to cost are not be quantified, validated or justified.

I also note that Cory at no time refute the ecological value of the fragile eco system on which they wish to build.

As I raised in my initial comments, I did not feel the assessment of the East Zone in the original Terrestrial Site Alternatives (as opposed to that in appendix H) was fair or valid.

Their own assessment identifies better performance against principle 1 and 2 by retaining habitats in the SINC and Nature Reserve. Principles 4 performs well if they accept the additional effort of routing the pipe work over the Coastal Path and Footpath 4.

In respect to 5 they clearly state this has one of the shortest ducting routes. Regarding Principle 6 it is acknowledged this option adds complexity by routing pipework through their own busy sites however they do not state that this cannot be done. This leaves one principle against which it performs very poorly, Principle 3, requiring the relocation of Iron Mountain.

To an environmentally conscious person this is a simple choice – destroy habitats and biodiversity including SINC, MOL and part of a Nature Reserve or relocate a business and use a Brown Field site. With that simple choice, who would do otherwise? In answer to that question, a company who is in this to make a great deal of money and wishes to avoid the very large outlay of relocating a business when they can buy a protected nature reserve cheaply. On top of this, they can do so whilst avoiding going head to head with a company bigger than themselves.

Cory are quick to mention the urgency of carbon capture and climate change but avoid mentioning the equally serious issue of habitat loss and species extinction.

Yours faithfully

Mrs Sarah Witney
Chair of Bexley Civic Society
Planning, Conservation and Environment Committee