

Dear Mr Geoff Underwood,

I attended the Preliminary meeting and was disheartened by Cory Energy's use of words like 'clean slate' for compulsory purchasing land that is part of a much-loved and important local nature reserve.

The applicants' additional submissions have not significantly altered my initial representation. However, for this deadline please consider my comments below **in blue** on the applicants' specific responses to the relevant representations (PINS Reference: EN010128).

### 2.2.19

*This is the approach used in considering MOL throughout the DCO Application, whilst also recognising the primacy of NPS EN-1 (paragraph 1.1.2) and the policy set out therein (not least at paragraph 4.2.17) that the Secretary of State's starting point for decision making is that critical national priority infrastructure (such as the Proposed Scheme) will meet the very special circumstances necessary to justify development in the Green Belt, and by association MOL.*

**Cory Energy are trying to justify building on a Site of Metropolitan Importance for Nature, on one of the last grazing marshes in London, even Very Special Circumstances should be questioned**

*2.3.3. North Zone 1 does avoid the Erith Marshes MSINC (but not the Thames and Tidal Tributaries MSINC), CNR and MOL. However, it would still impact upon these designations as the Flue Gas Ductwork from Riverside 2 would need to be located on the western and southern boundaries of the Riverside Campus, crossing Norman Road into North Zone 1. Not only would the length of the pipe need to be extended, it would also have to be located at a significant height that would still allow access for vehicles going to/from the existing Riverside Campus. North Zone 1 does not provide for a contiguous connection with the existing Riverside Campus without the diversion, or likely closure of the England Coast Path and FP 4.*

**This seems a more reasonable alternative to building on MOL and Crossness NR, to approach Iron Mountain rather than build on the reserve, there are other possible industrial sites in the borough they could relocate, it seems a case of ease and monetary saving rather than possibility for Cory's site choice.**

*2.3.8 - The East and Stable Paddocks are used as nature reserve incorporating grazing; for which the Proposed Scheme incorporates mitigation.*

**The Proposed Mitigation is not sufficient for removing nature reserve land that has been unbuilt on for hundreds of years, especially as Cory are just suggesting minor changes to Norman Road Fields and Biodiversity Net Gain at The Old Golf Course which should already be managed by Peabody / Tilfen Land who currently have the rights.**

*2.3.17 - Using land within the Belvedere Industrial Area, East Zones 1-3 avoids the MSINC, CNR and MOL. However, it would still impact upon the MOL as the Flue Gas Ductwork from Riverside 2 would need to be located on the western and southern boundaries of the Riverside Campus, crossing Norman Road into the East Zones. Not only would the length of the pipe need to be extended, it would also have to be located at a significant height that would still allow access for vehicles going to/from the existing Riverside Campus. There is also potential for direct adverse impact on the Belvedere Dykes SINC.*

**It seems the extension of the Duct pipes is technically possible therefore the option to build on the nearest option (Crossness nature reserve) should not be the best option.**

*2.5.2 - The Applicant agrees that there is a **level of tension between policy intended to address global warming and climate change priorities** and that seeking to maintain sites locally designated for ecology (often necessarily with a local focus), when considering proposals for built form that seek to deliver carbon capture infrastructure. Consequently, there is need to consider the Proposed Scheme as a whole, recognising the potential impacts of it, but also the benefits; this is standard procedure in planning decisions. Addressing climate change will be beneficial for those areas designated for biodiversity (both locally and globally) and the Proposed Scheme includes meaningful actions to address the local designations, to improve their quality for the foreseeable future.*

**This acknowledgement of 'level of tension' suggests diminishing nature reserves and removing or relocating wildlife in the name of building a CCS is counterproductive to the aim of addressing climate change and the global loss of biodiversity.**

**2.5.6 - However, the Applicant has minimised that impact, alongside minimised impact on existing businesses and local footpaths and avoiding Accessible Open Land.**

**Removing over 10% of the reserve is not minimising impact, it is unacceptable.**

2.5.8 Whilst the Applicant agrees there is some level of tension between policy prioritising climate change and ecology, it has demonstrated that the Proposed Scheme addresses that tension in an appropriate and positive manner.

**See 2.5.2 – There is no case for their proposals for the local nature reserve being a positive step in the name of climate change.**

2.6.21 Further, as explained in the DAD (APP-044 to 046) the design of the Proposed Scheme has evolved to optimise the wider functions of MOL, avoiding Accessible Open Land and presenting options to enhance connectivity and human access to this valuable green space.

**A fundamental misunderstanding of what a nature reserve is - It is not about human access and connectivity, there are areas just for wildlife to be observed, putting paths through existing fields (Lagoon field) has a negative affect on an additional part of the nature reserve. The 'improved routes' in this section are not to the benefit of nature.**

**3.2A.1 -**

Reply from GLA - Crossness LNR - Above-threshold changes in ammonia, nitrogen oxides, sulphur dioxide and nitrogen deposition are predicted by modelling at these sites. However, increases above the threshold are relatively small and thus the magnitude of change is low...indirect, permanent, long term, potentially up to Moderate Adverse (Significant) effect.

**'Relatively small' is doing a lot of work here, seems will be an increase of chemicals on a site that Cory claim want to help more people go to, the wildlife and visitors should not be exposed to such chemicals through the CCS being placed on the reserve.**

**Species**

**3.3.4 -**

Therefore, not all ecological surveys conducted covered the extended area within the Site, however, any shortfalls were validated using data collected at a later date (as described in **Appendices 7-4: Bat Survey Report to Appendix 7-10: Wintering Bird Survey Report of the Environmental Statement (Volume 3) (APP-091 to APP-097)**) (including utilising data obtained from the Friends of Crossness LNR), site walkovers and mapping to ensure the data used to inform the assessment presented in of **Chapter 7: Terrestrial Biodiversity of the Environmental Statement (Volume 1) (APP-056)** is robust. Furthermore, the crucial point to note is that there will be no loss of habitat within this extended area as a result of the Proposed Scheme, nor any increased disturbance from the Proposed Scheme construction activities. This area is instead incorporated as a Mitigation and Enhancement Area, which will be enhanced to achieve net gain for biodiversity.

**There does not seem to have been enough on the ground ecological surveys within the site.**

**3.2.4 - Furthermore, significant numbers of important species such as peak counts of Dunlin, Teal, Curlew, Wigeon, etc. were also recorded at this location. Therefore, as smaller groups of birds were recorded within the Site, the Site has been evaluated as being of County importance.**

Construction and running of the CCS will affect birds wintering on the reserve, there will; simply be less space available, the birds do not know the difference between Crossness LNR field and a mitigated field. Noise and vibration during long construction has been underplayed.

**All species mentioned in this section say 'Natural England does not raise concerns', but specialist users of the Nature reserve, representing Friends of Crossness, RSPB, Buglife, etc have serious concerns, these are not named by the applicant.**

**Cory mentions carrying out work when various types of animals are not active, yet construction if Riverside 2 is anything to go by will happen throughout the year.**

## Biodiversity Net Gain

**3.3.1** - *The Biodiversity Net Gain Report (Appendix 7-1: Biodiversity Net Gain Report of the Environmental Statement (Volume 3) (APP-088)) states in Paragraph 4.4.1 the 'overall net change in biodiversity'. +10.01% is achieved overall, with +1.31% achieved onsite and +8.70% offsite. 11.7% is being lost onsite, giving money to improve an already good wildlife space at the Old Golf Course is not sufficient nor is just renaming Norman Road Field as part of the Nature Reserve.*

**3.4.14** - *The NPPF goes on to state that 'inappropriate development' is, by definition, harmful to the Green Belt and therefore should not be approved except where there are very special circumstances. Building an industrial development on a nature reserve that is Metropolitan Open Land (green belt equivalent land) seems wholly inappropriate.*

### **3.4.38** -

*In the context of the wider strategic scale, this equates to only 0.022% of total MOL across Greater London. This statistic completely undervalues Crossness Nature Reserve and the areas that will be lost if this scheme is accepted.*

### **3.4.40**

*The limited harm resulting from the small loss of MOL will be comprehensively mitigated by a general improvement in the habitats present, the amenity experience of the retained MOL, and the delivery of a more consistent natural environment, of recreational facilities and improved access, which recognises the proximity of the local community through provision of extended and improved public rights of way. This does not have the wildlife of Crossness Nature reserve at heart, there is not significant improvement and there is a loss of habitat.*

### **3.4.65**

*Whilst the Proposed Scheme comprises 'inappropriate development', ultimately it will have limited impacts on the openness of MOL. It will have serious affect on Crossness Nature Reserve itself, nature reserve fields are to be observed not walked openly on.*

### **4-1-34**

*Although it is acknowledged access would be moved as part of the Proposed Scheme into Lagoon Field, bringing sources of disturbance from pedestrians and (on occasion) vehicles closer to birds within that area, this change would occur against existing background disturbance from access that currently runs across the northern boundary of Lagoon Field. In addition, movement would only comprise a relatively minor movement of several metres and is unlikely to lead to much more disturbance than the Lagoon Field experiences from the existing access already. As a regular user the moving of the path into this field is a huge disturbance. The current access separates wildlife and humans which is very important for a nature reserve.*

Yours Sincerely,

Calum F Kerr