

Date: 11 April 2025
Our Ref: 17947

DWD

69 Carter Lane
London
EC4V 5EQ

Development Management
London Borough of Bexley
2nd Floor, East Wing
Civic Offices
2 Watling Street
Bexleyheath
DA6 7AT

Emailed to:

Dear Mr

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

THE CONSTRUCTION AND OPERATION OF AN ENERGY STORAGE SYSTEM (ESS) AND ASSOCIATED WORKS ON LAND OFF NORTH CRAY ROAD, SIDCUP, BEXLEY

We write on behalf of Net Zero Thirty Two Limited (the 'Applicant'), and Firstway Energy, a partner of the Applicant, to submit a planning application to London Borough of Bexley in its capacity as local planning authority under the Town and Country Planning Act 1990 (the 'TCPA 1990') for the following:

"The construction and operation of an Energy Storage System, including earthworks, site access, cable connection route, landscaping and associated infrastructure on Land off North Cray Road, Sidcup, Bexley."

The Site comprises 9.44 hectares ('ha') of land and it is anticipated that the ESS would have a total import/export capacity of 200 Megawatts ('MW').

The Proposed Development would have an operational lifespan of approximately 40 years, following which the Site will be restored back to its former state.

The Proposed Development would provide further stability to the grid through the storage of electricity and the appropriate coordination and release of stored electricity when demand is high or otherwise required. As such, with the existing constraints of grid capacity in the UK, the consenting of ESS and other energy storage technology will be required to support the Country's transition into a Net Zero economy by 2050, which now includes an accelerated political target of 2030 for a net zero electricity system under the Labour Government, known as Clean Power 2030.

The Applicant

Firstway Energy is a UK based energy storage developer with a portfolio of sites across England and Wales. Firstway Energy's ethos is to provide utility scale energy storage systems to support the UK's transition to Net Zero while ensuring that the any system provides significant benefits to the local environment and results in no unacceptable environment to the local community.

Environmental Impact Assessment

The 2017 Town and Country Planning (Environmental Impact Assessment) Regulations (as amended) (EIA Regulations) apply to applications for planning permission under the 1990 Town and Country Planning Act.

An EIA Screening Request was submitted to the Council on 23 January 2025 (Ref. 25/00137/SCREEN). On 19 February 2025, the Council issued a Screening Opinion to the Applicant which confirmed that the Proposed Development did not constitute 'EIA development'.

Planning Application Submission

The Applicant submission consists of the following documents:

- Application Cover Letter (this document);
- Application Form and Certificates;
- Community Infrastructure Levy ('CIL') form;
- Planning, Design and Access Statement ('PDAS') prepared by DWD;
- Green Belt Assessment Report prepared by DWD;
- Plans (the full list of plans is itemised at Appendix 2 of this report);
- Statement of Community Involvement prepared by DWD;
- Health Impact Assessment prepared by Nimbus;
- Geo-Environmental Desk Study prepared by Redrock Geo;
- Sustainable Design, Construction and Renewable Energy Statement prepared by DWD;
- Landscape, Townscape and Visual Impact Assessment prepared by RHLA Limited;
- Illustrative Landscape Masterplan Prepared by RHLA Limited;
- Cultural Heritage Assessment prepared by Cotswolds Archaeology;
- Ecology and BNG Assessment prepared by Engain Ecology;
- Construction Traffic Management Plan prepared by Mott MacDonald;
- Noise Assessment prepared by Tetrattech;
- Flood Risk Assessment and Drainage Strategy prepared by Calibro;
- Outline Energy Storage Safety Management Plan prepared by Firstway Energy; and
- Arboricultural Impact Assessment prepared by Tree Heritage.

A full list of the plans and drawings submitted with the application is contained at Appendix 3 to the submitted Planning, Design and Access Statement.

It is understood from pre-application correspondence with the case officer that an Energy Statement is not required for this planning application, and therefore not a validation requirement.

Greater London Authority Referral

Category 3D in the 'Town and Country Planning Act (Mayor of London) Order 2008' (the 'Mayor's Order') requires that buildings with a floorspace more than 1,000m² and in the Green Belt be referred to the Greater London Authority ('GLA'). In the Mayor's Order, floorspace means "the total floor space in a building or buildings". The footprint (or gross external area) of the Proposed ESS would be 126.61sqm and therefore falls short of the floorspace requirement stipulated in Category 3D.

Community Infrastructure Levy (CIL) Liable Development

The Proposed Development would not comprise 'gross internal area' and therefore would not be CIL-liable. A CIL Form has been submitted with the planning application. In line with other energy storage projects, the Proposed Development is not CIL liable.

The Application has been submitted via the Planning Portal (ref. PP-13928213) and the application fee of £39,975.00 including the Planning Portal admin fee, has been paid via the Planning Portal.

We trust that sufficient information is provided to enable the Council to validate the Application, but should any further information be required or should you have any queries, please contact me via any of the methods below.

Rob Booth MRTPI
Director
DWD