



# Site Selection Report

North Cray Road Energy Storage System

Land at North Cray Road, Sidcup

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## 1.0 INTRODUCTION

### Overview

- 1.1 This Site Selection Report has been prepared by DWD on behalf of Net Zero Thirty Two Limited (the 'Applicant'), and Firstway Energy, a partner of the Applicant, in support of a planning application for the installation and operation of an energy storage system ('ESS') and associated infrastructure, including an underground connection cable.
- 1.2 The proposal is hereafter referred to as the 'Proposed Development'. The project is known as the 'North Cray Road ESS Project'.

### Site Summary

- 1.3 The proposed site (the 'Proposed Site' or 'Site') comprises approximately 9.44 hectares ('ha') of agricultural land located on land at North Cray Road, Sidcup, and includes the underground cable connection route and site access. The Main Site where the ESS would be located covers approximately 7.0 ha.
- 1.4 The Point of Connection ('PoC') for the Proposed Development into the electricity grid is via a connection into Hurst Grid Substation, which is located approximately 1.45 kilometres ('km') northeast of the Site on Stable Lane.
- 1.5 According to nationally available provisional Agricultural Land Classification ('ALC') data, which does not distinguish between Subgrades 3a and 3b, the Site comprises a mixture of Grade 2 and Grade 3 agricultural land. The submitted site-specific Agricultural Land Classification ('ALC') Report confirms that the Main Site comprises predominantly Subgrade 3a (good quality) (89%) agricultural land, with a very small portion of Grade 2 (very good quality) (11%) agricultural land. The remaining parts of the Site was not surveyed, as there are no above ground physical works proposed and the majority comprises existing hardstanding, and therefore does not form a limitation to the assessment.

### Firstway Energy

- 1.6 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. Firstway Energy carefully select sites with low material impacts, particularly visual, and work closely with local communities to be a good neighbour before, during and after installation.

### **Purpose and Structure of this Report**

- 1.7 The assessment set out in this report seeks to identify if there are any potentially more suitable sites situated on:
- Previously developed and/or non-agricultural land (hereafter referred to collectively as 'previously developed land'); or
  - Lower grade agricultural land (i.e. Grade 4).
- 1.8 This assessment is carried out in support of the planning application and seeks to demonstrate that the Applicant has considered sites within an appropriate distance of the substation on previously developed land and land of lower agricultural grades (i.e. Grade 4); locations which are typically preferred in the first instance under planning policy.
- 1.9 It should be noted, however, that the need for energy storage projects, such as the Proposed Development, is so great that if any suitable alternative sites are identified in this assessment, they should also be bought forward in order to meet that demand. For example, the Overarching National Policy Statement ('NPS') for Energy outlines the need for energy storage in order to support the Country's transition to a net zero economy and its legally binding climate change commitments to reduce greenhouse gas emissions. More information on the scale of need for energy storage projects can be found in the Planning, Design and Access Statement ('PDAS').
- 1.10 Importantly, it should also be noted that there is no statutory or defined policy requirement to carry out a 'site selection report' or similar. The Applicant has adopted a policy to carry out site selection reports for energy storage proposals when developing on greenfield sites in order to show that the site has been chosen with proper consideration of all relevant factors.
- 1.11 Feasible locations for ESS projects are severely limited by grid capacity, as they must be located within a connectable distance of a substation or other PoC with the capacity to take power from the grid and feed it back. The National Grid substation located off Stable Lane is identified as having such capacity for the Proposed Development and so forms the basis of this assessment. The Applicant has secured a grid connection offer to this National Grid substation, which is a key milestone in bringing forward renewable energy projects such as this.
- 1.12 The remainder of this report is structured as follows:
- Section 2 – key features of the site and the Proposed Development;
  - Section 3 – relevant planning policy;

- 
- Section 4 – the methodology applied to identify and assess alternative sites;
  - Section 5 – application of the methodology and assessment of alternative sites; and
  - Section 6 – summary and conclusions.

## **2.0 PROPOSED DEVELOPMENT**

### **The Proposed Site**

- 2.1 The Site is located entirely within the administrative area of the London Borough of Bexley ('LBB' or the 'Council') and comprises approximately 9.44 ha of agricultural land located to the south of North Cray Road and to the east of the A223, and includes the underground cable connection route and site access. The Main Site where the ESS would be located is 7.0 ha.
- 2.2 According to nationally available provisional ALC data, which does not distinguish between Subgrades 3a and 3b, the Site comprises a mixture of Grade 2 and Grade 3 agricultural land. The site-specific ALC Report confirms that the Main Site comprises predominantly Subgrade 3a (good quality) (89%) agricultural land, with a small portion of Grade 2 (very good quality) (11%) agricultural land, as set out in the ALC Report submitted as part of this application. The remaining parts of the Site was not surveyed, as there are no above ground physical works proposed and the majority comprises existing hardstanding, and therefore does not form a limitation to the assessment.
- 2.3 The Applicant acknowledges that the Main Site is considered to be best and most versatile ('BMV') and that agricultural land is a valuable resource. However, the applicant notes that the loss of this land is extremely limited whilst the Proposed Development offers substantial benefits. In addition, the proposed use would not be permanent and would revert to agricultural land following decommissioning.
- 2.4 The Site is bound to the north, west and east by agricultural fields / undeveloped land, and to the south by polytunnels associated with Honeywell Farm, as well as further adjoining agricultural fields, which are characterised by large industrial and agricultural-type buildings.
- 2.5 The Site comprises the Main Site where the ESS compound would be located, part of the access connecting the Main Site to North Cray Road and the underground cable corridor. The Main Site and access comprise of agricultural land, located approximately 700 metres ('m') northeast of Ruxley, 1 km south of North Cray, 1.2 km northeast of Foots Cray, and 2.6 km east of Sidcup.
- 2.6 The underground cable corridor runs northwards along the access track, before joining North Cray Road and travelling westward to join the A223. It then continues northwards along the A223, before turning onto the A2018 and turning again onto Stable Lane. It continues southwards along Stable Lane until it reaches land owned by National Grid, located approximately 1.45 km northeast of the



Site. The cable alignment is largely set within the public highway and has been designed to result in minimal disruption to agricultural land.

- 2.7 The closest residential properties are located approximately 230 m west of the Main Site, off of the A223 and on Cornell Close. Further residential areas are located approximately 300 m north on North Cray Road, which also include a riding school and stables, Yashu Farm, and Joyden Woods slightly further north. Approximately 400 m to the east are Stone Hill Woods and Chalkwood Farm. Larger and more notable settlements lie to the west and south in Sidcup, Ruxley and Foots Cray, along with the A223 and B2173 respectively. The immediate surrounding area consists of mainly agricultural fields and woodland, developing into industrial and commercial uses and residential areas to the south and west.

### **The Proposed Development**

- 2.8 Planning permission is sought for the installation and operation of an ESS of up to 200 megawatts ('MW') electrical capacity. The Proposed Development comprises the following:
- The erection of up to 200 energy storage units (7.81m (L); 1.72m (W); and 2.8m (H)), each comprising lithium-ion battery cells complete with an energy storage management system and mechanical ventilation, and transformers which are to be connected to each energy storage unit within the proposed ESS compound, also including:
    - electrical cabling and electrical connection corridor to 132kV switchyard;
    - 25no. Twin Skid TX units which would be situated between 2no. Inverter Units (total of 50no. Inverter units);
    - 50no. ESS Interface cabinets;
    - 2no. Customer Switchroom;
    - 1no. Storage container;
    - 2no. Welfare containers;
    - 132kV Substation Compound with associated equipment and District Network Operator Control Room structure;
    - site security (including fencing, security gates and CCTV);
    - customer control room; and
    - water hydrants and 2 x 240,000 litre water tanks.

- Other associated development works include:
  - Site preparation;
  - Provision of site access;
  - Provision of site drainage; and
  - Landscaping and biodiversity management areas on land adjoining the proposed ESS compound.

2.9 In terms of the design of the Proposed Development, the energy storage units would be situated within containerised units and located throughout the ESS compound. They would be placed on a hardcore/concrete base, with a stepped access at one end. Each unit is made up of a number of energy storage racks which have their own management system and interfaces with a centralised control management system.

2.10 The Proposed Development would be accessed at both construction and operation via an existing agricultural access track, which would be retained and improved. This track would connect to North Cray Road to the north of the Site, providing onward access to the A223. New access tracks within the Site comprising permeable hardcore will facilitate movement from the consented access points and within the Site for construction and maintenance.

### 3.0 PLANNING POLICY

- 3.1 The Search Area (as described in paragraph 4.8 of this report) encompasses the administrative areas of LBB, Dartford Borough Council ('DBC'), and a small portion in the south and southeast is within the London Borough of Bromley ('LB Bromley') and Sevenoaks District Council ('SDC').
- 3.2 LBB and DBC adopted their Local Plans in 2023 and 2024, respectively, and at present there are no emerging plans. LB Bromley is currently reviewing the Local Plan and consulted on a Regulation 18 Issues and Options document from 28 April to 30 June 2023. The Sevenoaks Local Plan 2040 Regulation 18 Part 2 Consultation has now closed and a summary of the consultation was reported to the Development and Conservation Advisory Committee on 26 March 2024. Until a new plan is adopted, the existing legacy plans and policies of LB Bromley and SDC will form the planning policy framework for the respective councils.
- 3.3 As such, the planning policy and guidance most relevant to the rationale of the Proposed Development and consideration of alternative sites is considered to comprise the following:
- Bexley Local Plan (adopted 2023);
  - Dartford Local Plan to 2037 (adopted 2024);
  - Bromley Local Plan (adopted 2019);
  - Sevenoaks Local Plan (adopted 2011);
  - The London Plan (2021);
  - National Planning Policy Framework ('NPPF') (December 2024); and
  - Overarching NPS ('NPS') for energy ('EN-1') (2023).
- 3.4 For further detail of the planning policy specifically relevant to the Site and the compliance of the Proposed Development with it, please refer to the PDAS that forms part of the application submission.

#### Local Planning Policy

##### Bexley Local Plan 2023

- 3.5 Policy SP1 (Achieving sustainable development – the spatial strategy) of the Local Plan states that *"All new proposals for development must conform with the following principles of securing sustainable development in Bexley, where appropriate, protect and enhance the natural and built environment by adapting to and mitigating the impacts of climate change."* Policy SP1 goes on to

state at Part 3 that the main focus for the housing, industrial and commercial growth identified for Bexley, at varying densities and including most of its supporting infrastructure, services and facilities, will be: a. Sustainable Development Location (identified on the Policies Map), b. designated industrial locations and c. the Thamesmead and Abbey Wood London Plan Opportunity Area. The Local Plan policy does not make specific reference to development in the countryside, however, Policy SP1 goes on to state at Part 4 that development proposals outside of the Sustainable Development Locations will be supported where they fully demonstrate compliance with all relevant Development Plan policies.

- 3.6 Local Plan Policy SP3 (Employment growth, innovation and enterprise) states: *“Designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) will be protected for industrial type activities and related functions, including ancillary facilities, specific to their designation in the hierarchy, as set out in Policy DP7 Appropriate uses within designated industrial areas. These designations are defined on the Policies Map.”* Local Plan Policy DP31 (Energy infrastructure) Paragraph 7.45 ‘policy implementation’ states: *“Renewable energy schemes will be strongly promoted in the borough and encouraged as part of development proposals where they are effective, viable and practical. Applications for renewable energy generation will be expected to demonstrate how the proposal has been sensitively designed to integrate into the local environment, minimising any potential negative impacts, both physically and environmentally.”* Paragraph 7.3 gives specific support to climate change mitigation via *“new technologies and renewable energies.”*
- 3.7 Local Plan Policy SP14 (Mitigating and adapting to climate change) states that *“The Council will actively pursue the delivery of sustainable development by supporting developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to net zero.”*
- 3.8 According to LB Bexley’s online interactive policies map, the Site is located in the Metropolitan Green Belt.
- 3.9 Policy SP8 (Green infrastructure including designated Green Belt) of the Bexley Local Plan states that development must support open spaces by, amongst other things:
- a. *“protecting Metropolitan Green Belt and Metropolitan Open Land from inappropriate development;*
  - b. *encouraging beneficial use of Metropolitan Green Belt such as opportunities for public access, outdoor sports and recreation, retaining and enhancing landscapes, visual amenity, biodiversity or to improve damaged and derelict land;”*

Dartford Local Plan 2024

- 3.10 The Search Area includes land covered by the Dartford Local Plan 2024.
- 3.11 Policy S1 (Borough Spatial Strategy) of the Local Plan states: *"1. Sustainable development will occur at planned locations in the Borough to meet assessed needs, securing new infrastructure provision and brownfield land re-use, creating neighbourhoods resilient and adaptive to climate change. Development should provide a diverse and complementary balance of uses and services within settlements, and minimise the necessity to travel by private vehicles...*
- 10. The openness and permanence of the Metropolitan Green Belt in the south of the Borough and at Dartford Marshes will be maintained. Development will only occur where in full accordance with Green Belt policies."*
- 3.12 Policy M3 (Sustainable Technology, Construction and Performance) states: *Developments for Energy Generation and Storage*: *In determining applications for energy storage or small and large scale low/ zero carbon technology and installations, the economic and environmental benefits of the proposal will be weighed against the individual and cumulative impact of the development. Development will only be permitted in line with national policy and where the following factors have been satisfactorily taken into consideration where applicable:*
- a. Minimising landscape impacts and impacts on ecology and agriculture;*
  - b. Shadow flicker and glare;*
  - c. Electronic and telecommunication interference/ navigation and aviation issues; and*
  - d. Ensuring installations are removed when no longer in use and land is then restored.*
- 3.13 Policy M12 (Green Belt) states:
- 1. Dartford Borough's Green Belt is shown on the Policies Map, and its essential characteristics are its openness and permanence. Inappropriate development in the Green Belt will be resisted in accordance with national planning policy.*
  - 2. Inappropriate development is by definition harmful to the Green Belt and will only be approved in very special circumstances. Very special circumstances will not exist unless potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.*
  - 3. In assessing other harm, the following criteria will be included in the local planning authority's consideration:*

- a. The extent of intensification of the use of the site;*
  - b. The impact of an increase in activity and disturbance resulting from the development, both on and off the site, including traffic movement and parking, light pollution and noise;*
  - c. The impact on biodiversity and wildlife;*
  - d. The impact on visual amenity or character taking into account the extent of screening required; and*
  - e. Impacts arising from infrastructure required by the development.*
4. *In assessing harm, development proposals will need to accord with, the objectives, purposes and essential characteristics of the Green Belt, particularly in terms of preserving permanent openness. Developments will also be assessed against the following criteria where applicable.*

*Agricultural Development*

*Development must not result in the loss of the best and most versatile agricultural land, disturb or damage soils of high environmental value, or impede the continuation of a lawfully existing agricultural development and/ or land use.*

*Proposals for farm diversification, including shops, processing, workshops or sports and recreation, must be ancillary to the existing main use. It must be demonstrated that the activity is related to the main farm use and that the proposal will not create the need for new buildings or supporting infrastructure and facilities that may harm rural character.*

- 3.14 Policy M20 (Identified Employment Areas) states: *“Identified employment areas will be maintained and developed for additional high quality, accessible and affordable commercial premises, and a more diverse range of new jobs in line with the Plan’s economic strategy, with improved transport provision and environmental benefits achieved. Additional business floorspace will be supported where proposals meet criteria 2 or 3”.*

*Bromley Local Plan 2019*

- 3.15 The Search Area includes land covered by the Bromley Local Plan (2019).
- 3.16 Policy 81 (Strategic Industrial Locations [SIL]) states: *In the designated SIL, the following uses will be permitted and safeguarded: a- ClassB1(b)andB1(c), b- ClassB2, and c- ClassB8. Notwithstanding the above uses, proposals on sites in the SIL where non ClassB operations are already in existence should seek to provide Class B uses. Proposals involving non Class B uses that reinforce the role of the SIL. Proposals in the SIL for Class B uses that include a quantum of floorspace to be used for display and*

*sales should demonstrate that this quantum of floorspace is clearly ancillary to the primary Class B uses.*

*On land in the SIL identified as an Office Cluster, ClassB1(a) uses will be permitted as a primary use for the land, provided that the use does not impede effective operation of other nearby businesses in the SIL. On land elsewhere in the SIL, proposals involving a ClassB1(a) use should demonstrate that the use is clearly ancillary to a primary ClassB1(b), B1(c), B2 or B8 use.*

*Proposals for waste management and disposal installations will be permitted, provided that the use does not impede the effective operation of other nearby businesses in the SIL or the primary function of the SIL as an Industrial Business Park.*

- 3.17 LB of Bromley consulted on a Regulation 18 Issues and Options document from 28 April to 30 June 2023. The council is currently considering the representations received as part of the consultation. However, there is no draft emerging plan at the time of submission.

#### Sevenoaks Local Plan

- 3.18 The Search Area includes land covered by the Sevenoaks Core Strategy (2011) and Allocation and Development Management Plan (ADMP) (2015).

- 3.19 Policy LO 1 (Distribution of Development) of the Sevenoaks Core Strategy (2011) states: “Development will be focused within the built confines of existing settlements...”

*In other locations priority will be given to protecting the rural character of the District. Development will only take place where it is compatible with policies for protecting the Green Belt and the High Weald and Kent Downs Areas of Outstanding Natural Beauty, where relevant. Development will be located to avoid areas at risk of flooding.”*

- 3.20 Policy LO 8 (Countryside and the Rural Economy) states: “The extent of the Green Belt will be maintained.

*The countryside will be conserved and the distinctive features that contribute to the special character of its landscape and its biodiversity will be protected and enhanced where possible....*

*Development that supports the maintenance and diversification of the rural economy, including development for agriculture, forestry, small scale business development and rural tourism projects, and the vitality of local communities will be supported provided it is compatible with policies for protecting the Green Belt, the Kent Downs and High Weald Areas of Outstanding Natural Beauty conserves and enhances the value and character of the District’s woodland and the landscape*

*character of other rural parts of the District and that it takes account of infrastructure requirements.”*

3.21 Policy SP 8 (Economic Development and Land for Business) states: *“The sustainable development of the District’s economy will be supported by: ....Sites used for business purposes will be retained in business use unless it can be demonstrated that there is no reasonable prospect of their take up or continued use for business purposes during the Core Strategy period. Redevelopment for mixed use of business sites in urban areas may exceptionally be permitted where such development would facilitate the regeneration of the site to more effectively meet the needs of modern business, where the employment capacity of the site, represented by the commercial floorspace, is maintained and where a mixed use development would represent a sustainable approach consistent with the general distribution of development.”*

3.22 Policy SC 1 (Presumption in favour of sustainable development) in the Sevenoaks ADMP (2015) states: *“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework...*

*Where appropriate to the proposed development, proposals should have regard to: a) the compatibility and suitability of the proposal to its location; b) the impact of the proposal on the surrounding environment, landscape, habitats and biodiversity, including the Green Belt and Area of Outstanding Natural Beauty; c) the contribution to creating balanced communities; d) the conservation and enhancement of the Districts cultural heritage; e) the contribution to and impact on the District's economy; and f) the impact on existing infrastructure and contribution to new supporting infrastructure”*

3.23 Policy EMP5 (Non-allocated employment sites) states: *“When considering proposals for the creation or loss of business uses on unallocated sites, the Council will assess the impact of the proposals on the environment, local economy and the local community.”*

3.24 LB Sevenoaks consulted on a draft Local Plan 2040 Part One from November 2022 to January 2023 and on the Local Plan 2040 Regulation 18 Part 2 consultation has now closed with a summary report presented to the Development and Conservation Committee on 26 March 2024. The next version of the Local Plan will be published in 2025 and at the time of submission this has not been published.

3.25 The draft Local Plan 2040 Part Two includes draft Policy CC3 (Low carbon and renewable energy) which seeks to support and increase the use of low carbon and renewable energy generation, distribution and storage. It goes on to state: *“Proposals for low carbon, renewable and decentralised*



*energy schemes in the Green Belt will not be permitted except where very special circumstances have been demonstrated in accordance with national policy. In this case, and where on agricultural land, it will be necessary to demonstrate that poorer quality land has been considered before higher quality, and that continued agricultural use has been explored”.*

### London Plan

3.26 Policy G2 (London’s Green Belt) of the London Plan states that *“The Green Belt should be protected from inappropriate development:*

- development proposals that would harm the Green Belt should be refused except where very special circumstances exist,*
- subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.*

*Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.”*

3.27 Policy GG2 (Making the best use of land) of the London Plan states that *“To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must protect and enhance London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.”*

3.28 Policy SP8 (Green infrastructure including designated Green Belt) of the Local Plan states that development must support open spaces by, amongst other things:

- a. “protecting Metropolitan Green Belt and Metropolitan Open Land from inappropriate development;*
- b. encouraging beneficial use of Metropolitan Green Belt such as opportunities for public access, outdoor sports and recreation, retaining and enhancing landscapes, visual amenity, biodiversity or to improve damaged and derelict land;”*

3.29 London Plan Policy SI 3 (Energy infrastructure) states that: *“development plans should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements, including energy centres, energy storage and upgrades to existing infrastructure”.* Paragraph 9.3.12 goes on to reiterate the need for producing and storing renewable energy, stating that *“The ability to*

*efficiently store energy as well as to generate it can reduce overall energy consumption, reduce peak demand and integrate greater levels of renewable energy into the energy system.”*

### **National Planning Policy Framework**

- 3.30 The NPPF was published in March 2012 and last updated in December 2024. The NPPF sets out the Government’s planning policies for England and how these are to be applied, including in respect of the development of agricultural land and renewable energy.
- 3.31 Paragraph 161 states, *“The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”*
- 3.32 Paragraph 168(a) recognises that LPAs should not require applicants for energy development *“to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future.”*
- 3.33 Paragraph 168(b) adds that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.
- 3.34 Paragraph 187 states that local planning authorities *“should contribute to and enhance the natural and local environment by:*
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
  - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
  - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
  - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and*

*incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*

*e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*

*f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

3.35 Footnote 65 states *“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”*

### **Overarching National Policy Statements for Energy**

3.36 NPS EN-1 is a material consideration for planning applications under the Town and Country Planning Act 1990 and has been included because it is the only policy document that provides any practical guidance in terms of alternative site assessments for energy projects.

3.37 The principles set out at paragraph 4.3.22 of EN-1 provide useful guidance, including the following:

*“Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:*

- the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and*
- only alternatives that can meet the objectives of the proposed development need to be considered.”*

3.38 Paragraph 4.3.23 adds that *“The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.”*

3.39 Paragraph 4.3.24 states that *“The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing*

*similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.”*

- 3.40 Paragraph 4.3.27 notes that *“Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State’s decision.”*
- 3.41 With paragraph 4.3.28 adding, *“Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State’s decision.”*
- 3.42 The above principles are effective provisions in terms of scoping the site selection report in this document; although, as stated, there is currently no statutory or specific planning policy requirement to consider alternative sites in relation to the development of agricultural land in EN-1 or in other planning policy documents.

## 4.0 METHODOLOGY

### Overview

- 4.1 This section sets out the qualitative, sequential methodology utilised to carry out the assessment. It should be noted that this type of methodology has been utilised to support other forms of energy related development, including many planning applications relating to energy storage and solar farms in the United Kingdom.
- 4.2 The assessment is split into two parts:
1. **Analysis of previously developed land** – to establish whether there are any potential alternative sites located on previously developed land that could be utilised (note: the Proposed Site is not previously developed land); and
  2. **Analysis of lower grade agricultural land** – to establish whether there are any potential alternative sites located on lower grade land that could be utilised (note: on the basis of the results of the ALC report at the Proposed Site summarised in para 1.5 of this report).
- 4.3 The methodology utilised to carry out the assessment is sequenced as follows:
- definition of a search area;
  - analysis of previously developed land;
  - analysis of lower grade agricultural land;
  - establishment of a long-list;
  - long-list filtering to create a short-list of sites; and
  - assessment of the short-list.
- 4.4 The above steps are explained in turn in the remainder of this section.

### The Search Area

- 4.5 It is important to identify a proportionate and appropriate area of search (hereafter referred to as the 'Search Area') from which potential alternative sites are identified for assessment.
- 4.6 There is no specific guidance in relevant planning policy documents to determine the geographic area that should be applied. The Search Area for this assessment has therefore been based on the requirement to connect the Proposed Development to a local electricity distribution network (hereafter referred to as the 'Grid') and the parameters associated with this, because any energy storage proposal without a feasible grid connection is not viable.

- 4.7 As stated previously, the Proposed Development would connect into the Hurst Grid substation on Stable Lane and the Search Area has therefore been drawn around this as the 'PoC'.
- 4.8 It is considered that 3 km is the likely maximum distance a cable connection could stretch without the Proposed Development becoming unviable. Although, these connections are theoretical as there is presently no opportunity to connect to any of the alternative sites identified and surveyed in this report. The Search Area for alternative sites has therefore been defined to include an area of 3 km around the PoC – please refer to Figure 1 at Appendix 1, which illustrates the Search Area. A closer site to the PoC is still preferred, even when both are within 3 km.
- 4.9 It should be noted that the LBB pre-application response (Reference 25/00139/PREAPM) suggested an appropriate search area of 2 km from the PoC be adopted: *“An appropriate search area is suggested as 2km from the POC. Available or potential derelict land should be included, including former industrial land etc.*

#### **Analysis of Previously Developed Land**

- 4.10 Relevant publicly available data was reviewed to identify previously developed land within the Search Area that could potentially be available for the Proposed Development.
- 4.11 The data under consideration consists of the most up-to-date, relevant adopted and/or emerging Local Plan documents produced by LB Bexley, LB Bromley and SDC and DBC. The following types of allocation/sites were added to a 'long-list' of potentially suitable sites:
- land allocated for renewable energy or other similar development (where relevant); and
  - land allocated for employment, or another land use that could potentially be compatible with energy development, i.e. industrial land (housing allocations or similar were discounted, as they are not typically compatible with ESS developments).
- 4.12 To further supplement the Local Plans, the following were also reviewed:
- the Estates Gazette website (<http://propertylink.estatesgazette.com>) where a search for commercial/industrial land can be carried out within a defined search area; and
  - the most recent version of the Councils' brownfield land register, which is maintained on the respective Council's website in accordance with government guidelines.

## **Analysis of Other Land Grades**

### Scope – Agricultural Land Classification Grades and Other Land Grades Considered in the Assessment

- 4.13 The ALC system classifies land into five grades (1-5), with Grade 3 subdivided into sub-grades 3a and 3b. BMV land is defined as Grades 1, 2 and 3a and is the land that is most flexible, productive and efficient in response to inputs, and which can best deliver food and non-food crops for future generations.
- 4.14 As mentioned previously, the Main Site comprises almost entirely of Subgrade 3a agricultural land, with a small portion of Grade 2 land. The Applicant acknowledges that this land is therefore considered BMV and that agricultural land is a valuable resource. However, the applicant notes that the loss of this land is extremely limited while the Proposed Development offers substantial benefits. In addition, the proposed use would not be permanent and would revert to agricultural land following decommissioning. Subsequently, as the nationally available ALC data does not distinguish Grade 3 land into subgrade 3a and 3b, the assessment set out in this report focuses on considering whether there are any potential alternative Grade 4 or 5 sites, i.e. lower grade agricultural land than the Proposed Site.
- 4.15 Figure 2, at Appendix 1, shows the ALC grades of the agricultural land located within the Search Area. It demonstrates that the Search Area is a mixture of urban and non-agricultural land, Grade 2 and Grade 3 land. As such, the Search Area is constrained in that there is only a small patch of Grade 4 and no Grade 5 agricultural land available.

### Site Identification Criteria

- 4.16 In order to identify potentially suitable sites, the identification process utilised Geographical Information Systems ('GIS') to map out and identify the different grades of agricultural land within the Search Area, as per the Government's nationally available Provisional ALC data.
- 4.17 Land which was found to be of a lower land grade was then split into potential sites for assessment. The sites were defined through the application of professional judgement with the focus on viability and having regard to the following:
- irregular areas avoided;
  - any urban/built up areas avoided;
  - continuous areas of incompatible land use (e.g. avoiding woodland) avoided;
  - suitable topography for the purpose of the Proposed Development;

- avoiding sites split by roads, railway lines and water bodies, where possible;
- boundaries defined by natural and man-made features (e.g. rivers, woodland, roads and properties) used where possible; and
- avoiding areas of high flood risk.

### **Filtering of the Long-List**

- 4.18 Following the principle in paragraph 4.3.23 of EN-1, that there should be a realistic prospect of delivering the same infrastructure capacity, and paragraph 4.3.22 of EN-1, that only alternative sites that can meet the objectives of the proposed development need be considered, we have searched only for alternative sites with an area greater than or equal to the 7 ha area of the Main Site because a smaller site would likely not be able to deliver approximately the same generation capacity as the proposed ESS. Therefore, the long list was then ‘filtered’ to remove any sites below 7 ha (the approximate area of the main compound of the Proposed Site).
- 4.19 Multiple sites equating to a total of 7 ha were not considered in the assessment, because a scheme comprising of multiple sites is not considered to represent a comparable alternative. This is because in comparison to a single, continuous site, multiple sites would have other potentially limiting factors, including, but not limited to, legal agreements with multiple landowners; the complexity and cost of connecting multiple sites to the electricity distribution network; and the potential for intensified disruption associated with the development of multiple sites.
- 4.20 For the above reasons, the consideration of multiple sites is not considered proportionate, realistic or deliverable as an alternative when considering, amongst other things, the principles set out in paragraph 4.3.23 of NPS EN-1.

### **Assessment of the Short-List**

- 4.21 Following the filtering exercise of the long list, any remaining sites are then added to a ‘short-list’ and assessed against a range of viability criteria (determined with reference to relevant planning policy), as follows:
- Is the land likely to be available, e.g. on the market or proposed for another use?
  - Is the topography favourable?
  - Distance from the potential PoC – is the potential PoC on site or further away?
  - Are there obstacles between the site and potential PoC?
  - Shape of the site – is it regular/irregular?



- Is the land clear and developable?
- Are there any PRoWs crossing the land?
- Is that land at risk of flooding?
- Any other relevant considerations? e.g. land outside the Green Belt

4.22 The assessment of the short-list determines whether there are any potential feasible alternative sites. The assessment utilises professional experience and judgement to draw conclusions.

4.23 It should be noted that the consideration of some criteria is repeated at the short-list stage, in order to apply the criteria to sites generated by the search of previously developed land, as these sites were not subjected to the GIS exercise utilised by the search for lower grade agricultural land (where these criteria has previously been applied).

## 5.0 ASSESSMENT

5.1 This section sets out the following parts of the assessment:

- previously developed land search;
- lower grade agricultural land search;
- long-list filtering; and
- assessment of sites on the short-list.

### Previously Developed Land

5.2 The Councils' Local Plans and supporting evidence base documents were reviewed to search for previously developed land for the long-list. The respective brownfield land registers and the Estates Gazette were also reviewed. Where sites were identified in multiple documents, only one entry would be included.

5.3 **37 sites** were identified following analysis of previously developed land.

### Lower Grade Agricultural Land

5.4 The GIS criteria set out in Section 4 of this report were applied and used to set out ALC grades in the search area and divide lower grade agricultural land into alternative sites. The sequential application of the GIS criteria is illustrated in Figures 1-5 at Appendix 1 of this report, with Figure 5 showing the unconstrained land.

5.5 The analysis of lower grade agricultural land showed there to be only one very small area of Grade 4 agricultural land within the Search Area, located to the east of the Site. The majority of the Search Area is dominated by non-agricultural or urban land, as shown by Figure 2 in Appendix 1, and the available agricultural land is either a higher or equal grade. Therefore, these areas were not considered to amount to an alternative site of lesser agricultural and environmental quality land.

5.6 After analysis of the areas of the lower agricultural land, of which there is only area of insufficient size on Grade 4 land, **no sites** were identified. As mentioned previously, there is no Grade 5 agricultural land within the Search Area.

### Long-List and Filtering

5.7 As shown in Table 5.1, **four** sites were of an area greater than 7 ha and have been added to the short-list. The remaining 33 sites have been filtered out from the short-list due to insufficient size to accommodate the Proposed Development.

**Table 5.1: Long-list filtering**

SITE REFERENCE	SITE ADDRESS	APPROX. AREA (HA)	SOURCE	FILTERING – 3.82 HA OR ABOVE?
<b>Bexley</b>				
BLR341 / CRA03	Sainsbury Crayford	3.7 ha	Bexley Brownfield Register	No – insufficient size
BLR340 / CRA02	Tower Retail Park	3.45 ha	Bexley Brownfield Register	No – insufficient size
Nil	Crayford Industrial Area (SIL)	13.9 ha	Bexley Local Plan	Yes – sufficient size
Nil	Bourne Industrial Park (SIL)	3.1 ha	Bexley Local Plan	No – insufficient size
Nil	Foots Cray Business Area (SIL)	8.1 ha	Bexley Local Plan	Yes – sufficient size
Nil	Five Arches Business Centre (SIL)	8.6 ha	Bexley Local Plan	Yes – sufficient size
CRA01	Former Electrobases/Wheatsheaf Works	2.164 ha	Bexley Local Plan	No – insufficient size
Nil	Five Arches Business Centre (west)	<1 ha (0.67)	Bexley Local Plan	No – insufficient size
Nil	Yard at LEFA Business Park, Edgington Way, Sidcup	<1 ha	Estates Gazette	No – insufficient size
Nil	Unit 1 Five Arches Business Estate	<1 ha	Estates Gazette	No – insufficient size
Nil	Old Bexley Employment Area	<1ha (0.34 ha)	Bexley Local Plan	No – insufficient size
Nil	West Crayford Industrial Site	<1.1 ha	Bexley Local Plan	No – insufficient size
BXH03 / BLR335	EDF Energy (BLR335)	<1 ha (1.48 ha)	Bexley Local Plan map & Brownfield Register	No – insufficient size
BXH02 / BLR334	Bexley Heath Town Centre East	0.81 ha	Bexley Local Plan map & Brownfield Register	No – insufficient size
BLR316	37 Monterey Close	<1 ha (0.41 ha)	Bexley Brownfield Register	No – insufficient size
BLR303	20 - 21 St James Way	<1 ha (0.3 ha)	Bexley Brownfield Register	No – insufficient size
BLR319	Cray House Maidstone Road	<1 ha (0.8 ha)	Bexley Brownfield Register	No – insufficient size
BLR257	2 Cray Buildings, Foots Cray High Street	<1 ha (0.02ha)	Bexley Brownfield Register	No – insufficient size
BLR276	Parker House, Bexley High Street	<1 ha (0.05ha)	Bexley Brownfield Register	No – insufficient size
BLR291	Rear Of 37 Bourne Road, Formerley Fleet Fabrications, Bourne Road	<1 ha (0.16ha)	Bexley Brownfield Register	No – insufficient size
BLR289	77-77A Bexley High Street	<1 ha (0.02ha)	Bexley Brownfield Register	No – insufficient size
BLR339	Former Electrobases/Wheatsheaf Works	2.2 ha (0.05ha)	Bexley Brownfield Register	No – insufficient size
BLR239	86 Crayford Road	<1 ha (0.06ha)	Bexley Brownfield Register	No – insufficient size

BLR290	76-84 Crayford High Street, Crayford	<1 ha (0.05ha)	Bexley Register	Brownfield	No – insufficient size
BLR346	122 Watling Street, Bexleyheath	<1 ha (0.05ha)	Bexley Register	Brownfield	No – insufficient size
BLR300	11-15 Market Place	<1 ha (0.17ha)	Bexley Register	Brownfield	No – insufficient size
BLR293	West Lodge, Russell Close	<1 ha (0.09ha)	Bexley Register	Brownfield	No – insufficient size
BLR350	Land Rear Of Broadway House, Trinity Place, Bexleyheath	<1 ha (0.03ha)	Bexley Register	Brownfield	No – insufficient size
BLR037	Land Rear Of 198 Broadway, Bexleyheath	<1 ha (0.05ha)	Bexley Register	Brownfield	No – insufficient size
BLR351	234 Broadway, Bexleyheath	<1 ha (0ha)	Bexley Register	Brownfield	No – insufficient size
Dartford					
Nil	Rochester Way Identified Employment Area	6.8ha	Dartford Local Plan		No – insufficient size
SHLAA 214	County Estate Department Depot, Broad Lane, Wilmington DA2 7AG	<1 ha (0.28 ha)	Dartford Register	Brownfield	No – insufficient size
SHLAA 53	40 Chastilian Road, Dartford, Kent, DA1 3JJ	<1 ha (0.1 ha)	Dartford Register	Brownfield	No – insufficient size
Bromley					
Nil	Klingers Industrial Park (SIL)	7.5 ha	Bromley Local Plan		Yes – sufficient size
Nil	Unit 7-11, Sidcup Logistics Park East, Sandy Lane, Sidcup, Kent, DA14	<1 ha	Estates Gazette		No – insufficient size
Sevenoaks					
BFR31	Upper Hockenden Farm, Hockenden Lane, Swanley	2.36 ha	Sevenoaks Register	Brownfield	No – insufficient size
BFR133	College Road Nurseries, College Road, Hextable	0.27 ha	Sevenoaks Register	Brownfield	No – insufficient size

### Assessment of the Short-List

5.8 The four identified sites were both within approximately 3 km of the PoC, were not less than 7 ha in size, comprised urban land, and were not otherwise constrained for the reasons set out above. These sites were:

1. Foots Cray Business Area
2. Five Arches Business Centre
3. Crayford Industrial Area
4. Klingers Industrial Park

5.9 Figure 6 at Appendix 2 illustrates the location of the short-listed sites. Whilst three of the four sites are partially outside of the 3 km search area (Crayford Industrial Area, Footscray Business Area and Klingers Industrial Area), they have been included within the assessment for additional robustness.

- 5.10 The criteria set out in Section 4 of this report are first applied to the Proposed Site (to provide context) and then to the other short-listed sites. The assessment was desk-based; carried out with reference to, amongst other things, available aerial imagery and Figures 1-5 at Appendix 1.

#### **The Proposed Site**

- 5.11 The Proposed Site within which the ESS would be located comprises approximately 7 ha of agricultural land at North Cray Road, Sidcup.

**Table 5.1: Assessment of the Proposed Site**

<b>Criteria</b>	<b>Assessment</b>
Is the land likely to be available, e.g. on the market or proposed for another use?	The Proposed Site is available to the Applicant, is ready for development and is not subject to any other proposed uses or allocations that might be considered incompatible.
Is the topography favourable?	The Proposed Site benefits from favourable topography for the purposes of an ESS.
Distance from the potential PoC – is the potential PoC onsite or further away?	The Proposed Site is located approximately 1.45 km southwest of the PoC and is therefore likely to be viable.
Are there obstacles between the Site and PoC?	The proposed cable route runs along approximately 3.3 km of land comprised almost entirely of public highway. The route is entirely unobstructed, allowing any further damage or impact on agricultural land to be minimised.
Shape of the Site – is it regular/irregular?	The Proposed Site is considered to be made up of land of a regular shape for the purposes of developing an ESS.
Is the land clear and developable?	The Proposed Site is entirely clear and developable.
Are there any PRoWs crossing the site?	There are no PRoWs within or adjacent to the Proposed Site.
Flood risk areas – Flood Zone 1 – favoured.	The Proposed Site is located entirely in Flood Zone 1.
Any other relevant considerations?	The Proposed Site comprises almost entirely of Subgrade 3a agricultural land, with a small portion of Grade 2 land. The Site is outside of the Sustainable Development Locations on the policies map and is within the Metropolitan Green Belt.

- 5.12 Summary and discussion: the Proposed Site performs very well against the site requirement criteria, including that it is available to the Applicant, is regular in shape, has favourable topography, is entirely clear and developable, is viable, and is entirely within Flood Zone 1. It benefits from close proximity to the PoC, with the cable route minimising any further impacts on agricultural land.

Consideration of the Site designation within the Metropolitan Green Belt (refer to Green Belt Assessment, prepared by DWD) considers that the Site is Grey Belt and therefore the Proposed Development is 'not inappropriate' development within the Green Belt, and that there would be no harm to the openness or any other harm to the remaining areas of the Green Belt.

#### Short-listed Sites

- 5.13 The following short-listed sites are not considered to be suitable alternative sites for the Proposed Development given they relate to strategic allocations in the Bexley and Bromley Local Plans, typically comprise separate industrial lots (possibly owned by various third parties) which would be unlikely redeveloped, and the London and Local Plan policies would discourage redevelopment for the purposes of the Proposed Development. Notwithstanding, these sites have been included in the short-list for the sake of thoroughness.

#### Crayford Industrial Area

- 5.14 The Crayford Industrial Area comprises an area of Strategic Industrial Land (SIL) currently developed with buildings, internal roads and car parking. It is located to the immediate north of the railway line and immediately south of the River Cray. It covers an area of approximately 13.9 ha. It is partially outside of the Search Area however has been included in the Short List.

**Table 5.2: Assessment of Crayford Industrial Area**

Criteria	Assessment
Is the land likely to be available, e.g. on the market or proposed for another use?	The Crayford Industrial Area is not known to be available to the Applicant or proposed for any other use, i.e. there is no land listed on the Brownfield Register nor industrial premises for sale/auction within it.
Is the topography favourable?	Crayford Industrial Area benefits from favourable topography for the purposes of an ESS.
Distance from the potential PoC – is the potential PoC onsite or further away?	Crayford Industrial Area is located approximately 2.8 km (at its closest point) from the Point of Connection. A cable connection via public roads would involve works to approximately 4.5 km of public highway to connect the site to Hurst Grid Substation. It would therefore evoke significant disruption to the local highway network.
Are there obstacles between the Site and PoC?	The A2018, A2, A207 and other roads, a railway line, third party land for which the applicant does not have control, and areas of Flood Zone 2 and 3 lie between the Crayford Industrial Area and the Point of Connection.
Shape of the Site – is it regular/irregular?	Crayford Industrial Area comprises a number of lots that are considered to be of a regular shape.
Is the land clear and developable?	Crayford Industrial Area is existing Strategic Industrial Land (SIL) occupied by various buildings, private businesses, internal roadways and car parking areas. The Site is

	allocated for SIL and there are no lots/sites within it that are listed on the Brownfield Register or for sale/auction in the Estates Gazette.
Are there any PRowS crossing the Site?	There are no PRowS crossing Crayford Industrial Area however there is a public footpath to the north on the opposite side of the River Cray.
Flood risk areas – Flood Zone 1 – favoured.	Crayford Industrial Area is located predominantly within Flood Zone 3 with some patches of Flood Zone 2. Flood Zone 3 is the area at highest risk of flooding and as per the NPPF, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk of flooding.
Any other relevant considerations?	According to the nationally available provisional ALC survey the land is ‘urban land’ and is not within the Green Belt. The National Fire Chiefs Council’s (‘NFCC’) guidance on ESSs requires units to be located an initial minimum distance of 25 m from occupied buildings.

5.15 Summary and discussion: The Crayford Industrial Area is not located on agricultural land and is classified as ‘urban’ land outside of the Green Belt. However, it is unlikely to be commercially viable given the distance and constraints between it and the PoC. A cable connection would also require works to 4.5 km of public highway, which would cause disruption to local communities. The Crayford Industrial Area is characterised by flat topography which would be favourable for ESS development. The site is located in proximity to the River Cray and sits predominantly within Flood Zone 3 (and to a lesser extent Flood Zone 2) and therefore is in the area of the highest risk of flooding within which ‘inappropriate development’ should be avoided and subject to the Sequential and Exceptions Tests in Paragraph 173 and 177 of the NPPF, respectively. The site is allocated for SIL under the London and Local Plan. London Plan Policy E5 seeks to protect and intensify the function of SIL’s and while London Plan Policy E4 does permit ‘utilities infrastructure such as energy and water’, this is taken to refer to small scale infrastructure rather than a generating system such as ESS. Further to this, the site is currently developed with buildings, private businesses, internal roadways and car parking and there is no brownfield land listings nor lots/sites for sale/auction within it that would suggest the land may become readily available. The development of an ESS here would also likely contradict NFCC guidance requiring at least 25 m separation from occupied buildings. The land is not immediately available to the Applicant to develop ESS development within the Crayford Industrial Area may require more than one lot/site becoming available at once to accommodate the size of the Proposed ESS. Therefore, it is not considered to comprise a suitable alternative site for the Proposed Development.

#### Foots Cray Business Area

5.16 The Foots Cray Business Area comprises an area of SIL currently developed with buildings, internal roads and car parking. It is located to the immediate north the A223, immediately south of Maidstone Road, immediately east of the River Cray and is surrounded by other SIL. It covers an

area of approximately 8.1 ha. It is partially outside of the Search Area however has been included in the Short List.

**Table 5.3: Assessment of Foots Cray Business Area**

Criteria	Assessment
Is the land likely to be available, e.g. on the market or proposed for another use?	The Foots Cray Business Area is not known to be available to the Applicant or proposed for any other use, i.e. there is no land listed on the Brownfield Register nor industrial premises for sale/auction within it.
Is the topography favourable?	Foots Cray Business Area benefits from favourable topography for the purposes of an ESS.
Distance from the potential PoC – is the potential PoC onsite or further away?	Foots Cray Business Area is located approximately 2.7 km (at its closest point) from the PoC. A cable connection via public roads would involve works to approximately 3.4 km of public highway to connect the site to Hurst Grid Substation.
Are there obstacles between the Site and PoC?	The A223, B2173, Maidstone Road, and other roads, third party land for which the applicant does not have control, and areas of Flood Zone 2 and 3 lie between the Foots Cray Business Area the Point of Connection.
Shape of the Site – is it regular/irregular?	Foots Cray Business Area comprises a number of lots that are considered to be of a regular shape.
Is the land clear and developable?	Foots Cray Business Area is existing Strategic Industrial Land (SIL) occupied by various buildings, private businesses, internal roadways and car parking areas. The Site is allocated for SIL and there are no lots/sites within it that are listed on the Brownfield Register or for sale/auction in the Estates Gazette.
Are there any PRowS crossing the Site?	There is one PRow (FP169) crossing through the Foots Cray Business Area.
Flood risk areas – Flood Zone 1 – favoured.	Foots Cray Business Area is located predominantly within Flood Zone 1, 2 and 3. Flood Zone 2 and 3 are the areas of medium to the highest risk of flooding and as per the NPPF, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk of flooding.
Any other relevant considerations?	According to the nationally available provisional ALC survey the land is 'urban land' and is not within the Green Belt. The NFCC's guidance on ESSs requires units to be located an initial minimum distance of 25 m from occupied buildings.

5.17 Summary and discussion: The Foots Cray Business Area is not located on agricultural land and is classified as 'urban' land outside of the Green Belt. However, it is unlikely to be commercially viable given the distance and constraints between it and the PoC. The Foots Cray Business Area is characterised by flat topography which would be favourable for ESS development. The site is located in proximity to the River Cray and sits in Flood Zone 1, 2 and 3 and therefore is in the area of medium to the highest risk of flooding within which 'inappropriate development' should be avoided and subject to the Sequential and Exceptions Tests in Paragraph 173 and 177 of the NPPF,



respectively. The site is allocated for SIL under the London and Local Plan. London Plan Policy E5 seeks to protect and intensify the function of SIL's and while London Plan Policy E4 does permit 'utilities infrastructure such as energy and water', this is taken to refer to small scale infrastructure rather than a generating system such as ESS. Further to this, the site is currently developed with buildings, private businesses, internal roadways and car parking and there is no brownfield land listings nor lots/sites for sale/auction within it that would suggest the land may become readily available. The development of an ESS here would also likely contradict NFCC guidance requiring at least 25 m separation from occupied buildings. The land is not immediately available to the Applicant to develop ESS development within the Foots Cray Business Area may require more than one lot/site becoming available at once to accommodate the size of the Proposed ESS. Therefore, it is not considered to comprise a suitable alternative site for the Proposed Development.

#### Five Arches Business Area

- 5.18 The Five Arches Business Area comprises an area of SIL currently developed with buildings, internal roads and car parking. It is located to the immediate north of the A211 (Foots Cray High Street), immediately south of Foots Cray Meadows, immediately east of the River Cray and is surrounded by other SIL. It covers an area of approximately 8.6 ha.

**Table 5.4: Assessment of Five Arches Business Area**

Criteria	Assessment
Is the land likely to be available, e.g. on the market or proposed for another use?	The Five Arches Business Area is not known to be available to the Applicant or proposed for any other use, i.e. there is no land listed on the Brownfield Register nor industrial premises for sale/auction within it.
Is the topography favourable?	Five Arches Business Area benefits from favourable topography for the purposes of an ESS.
Distance from the potential PoC – is the potential PoC onsite or further away?	Five Arches Business Area is located approximately 2.45 km (at its closest point) from the PoC. A cable connection via public roads would involve works to approximately 3.7 km of public highway to connect the site to Hurst Grid Substation.
Are there obstacles between the Site and PoC?	The A223 and other roads, Foots Cray Meadows, and third party land for which the Applicant does not have control lie between the Five Arches Business Area the Point of Connection.
Shape of the Site – is it regular/irregular?	Five Arches Business Area comprises a number of lots that are considered to be of a regular shape.
Is the land clear and developable?	Five Arches Business Area is existing Strategic Industrial Land (SIL) occupied by various buildings, private businesses, internal roadways and car parking areas. The

	Site is allocated for SIL and there are no lots/sites within it that are listed on the Brownfield Register or for sale/auction in the Estates Gazette.
Are there any PRowS crossing the Site?	There are no PRowS crossing through or adjoining the Five Arches Business Area.
Flood risk areas – Flood Zone 1 – favoured.	Five Arches Business Area is located predominantly within Flood Zone 3, with small patches of Flood Zone 1 and 2. Flood Zone 3 is the area of highest risk of flooding and as per the NPPF, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk of flooding.
Any other relevant considerations?	According to the nationally available provisional ALC survey the land is ‘urban land’ and is not within the Green Belt. The NFCC’s guidance on ESSs requires units to be located an initial minimum distance of 25 m from occupied buildings.

5.19 Summary and discussion: The Five Arches Business Area is not located on agricultural land and is classified as ‘urban’ land outside of the Green Belt. However, it is unlikely to be commercially viable given the distance and constraints between it and the PoC. A cable connection would also require works to 3.7 km of public highway. The Five Arches Business Area is characterised by flat topography which would be favourable for ESS development. The site is located in proximity to the River Cray and sits predominantly within Flood Zone 3 and therefore is in the area of the highest risk of flooding within which ‘inappropriate development’ should be avoided and subject to the Sequential and Exceptions Tests in Paragraph 173 and 177 of the NPPF, respectively. The site is allocated for SIL under the London and Local Plan. London Plan Policy E5 seeks to protect and intensify the function of SIL’s and while London Plan Policy E4 does permit ‘utilities infrastructure such as energy and water’, this is taken to refer to small scale infrastructure rather than a generating system such as ESS. Further to this, the site is currently developed with buildings, private businesses, internal roadways and car parking and there is no brownfield land listings nor lots/sites for sale/auction within it that would suggest the land may become readily available. The development of an ESS here would also likely contradict NFCC guidance requiring at least 25 m separation from occupied buildings. The land is not immediately available to the Applicant to develop ESS development within the Five Arches Business Area may require more than one lot/site becoming available at once to accommodate the size of the Proposed ESS. Therefore, it is not considered to comprise a suitable alternative site for the Proposed Development.

#### [Klingers Industrial Park](#)

5.20 The Klingers Industrial Park (Bromley Local Plan) comprises an area of an area of SIL currently developed with buildings, internal roads, car parking and other hardstanding. It is located to the immediate north of the A20, south-east of the A223, west of Sandy Lane, and east of the River Cray.

It covers an area of approximately 7.5 ha and is largely outside of the Search Area however has been included in the Short List.

**Table 5.5: Assessment of Klingers Industrial Park**

Criteria	Assessment
Is the land likely to be available, e.g. on the market or proposed for another use?	The Klingers Industrial Park is not known to be available to the Applicant or proposed for any other use, i.e. there is no land listed on the Brownfield Register. There is an industrial premise for sale/auction within the Klingers Industrial Area, listed on the Estates Gazette being unit 7-11, Sidcup, Logistics Park East, Sandy Lane, Sidcup Kent, however, this premises is <1 hectare in area (34,705 square feet) and would therefore not be of a sufficient size for the Proposed Development. It should also be noted that this unit would be outside of the 3km Search Area and therefore outside the commercially viable distance from the Point of Connection.
Is the topography favourable?	The Klingers Industrial Park benefits from favourable topography for the purposes of an ESS.
Distance from the potential PoC – is the potential PoC onsite or further away?	The Klingers Industrial Park is located approximately 2.75 km (at its closest point) from the PoC. A cable connection via public roads would involve works to approximately 3.2 km of public highway to connect the site to Hurst Grid Substation.
Are there obstacles between the Site and PoC?	The B2713, Sandy Lane, and other roads, and third party land for which the applicant does not have control over, lie between the Klingers Industrial Park and the Point of Connection.
Shape of the Site – is it regular/irregular?	The Klingers Industrial Park comprises a number of lots that are considered to be of a regular shape.
Is the land clear and developable?	The Klingers Industrial Park occupied by various buildings, private businesses, internal roadways, other hardstanding and car parking areas. The Site is allocated as Strategic Industrial Land (SIL) in the Bromley Local Plan and London Plan. As mentioned previously, there are no lots/sites within it that are listed on the Brownfield Register however there is an industrial premise for sale/auction within the Klingers Industrial Park listed on the Estates Gazette which comprises an existing industrial unit.
Are there any PRoWs crossing the Site?	There are no PRoW crossing through or adjacent to the Klingers Industrial Park.
Flood risk areas – Flood Zone 1 – favoured.	The Klingers Industrial Park is predominantly located within Flood Zone 1, the area of least risk of flooding. There is a small part of the site within Flood Zone 2, the area of medium risk of flooding within which 'inappropriate development' should be avoided.
Any other relevant considerations?	According to the nationally available provisional ALC survey the land is 'urban land' and is outside the Green Belt. There is a Grade II Listed Building within the Site. The Ruxley Gravel Pits SSSI adjoins the site to the south-west and there is Ancient Woodland to the east on the other side of Sandy Lane. The NFCC's guidance on ESSs requires units to be located an initial minimum distance of 25 m from occupied buildings.

5.21 Summary and discussion: The Klingers Industrial Park is not located on agricultural land and is classified as 'urban' land outside of the Green Belt. However, it is unlikely to be commercially viable given the distance and constraints between it and the PoC. The Klingers Industrial Park is characterised by flat topography which would be favourable for ESS development. The site is located in proximity to the River Cray and sits predominantly within Flood Zone 1 however a small portion of the site is within Flood Zone 2, the area of medium risk of flooding within which 'inappropriate development' should be avoided and subject to the Sequential Test in Paragraph 173 of the NPPF. There is a Grade II Listed Building within the site, being item 1387704 'FRONTAGE BUILDING TO RICHARD KLINGER FACTORY'. The site is allocated for SIL under the London Plan and Bromley Local Plan. London Plan Policy E5 seeks to protect and intensify the function of SIL's and while London Plan Policy E4 does permit 'utilities infrastructure such as energy and water', this is taken to refer to small scale infrastructure rather than a generating system such as ESS. Bromley Local Plan Policy 81 seeks to permit and safeguard Use Classes B1(b) and B1(c), B2 and B8 within SILs, with some exceptions for waste management sites and Use Class B1(a). The site is currently developed with buildings, private businesses, internal roadways, car parking and other hardstanding, and there is no brownfield land listings within the site that would suggest the land may become readily available. The development of an ESS here would also likely contradict NFCC guidance requiring at least 25 m separation from occupied buildings. There is a lots/sites for sale/auction within it however it would not be of a sufficient size (<1ha) in and of itself, and would require more than one lot/site becoming available at once to accommodate the size of the Proposed ESS. Further to this, the available unit/lot and the majority of the Klingers Industrial Park lie outside of the 3km Search Area and therefore exceed the distance from the point of connection which is considered to be commercially viable. Therefore, it is not considered to comprise a suitable alternative site for the Proposed Development.

## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 This Site Selection Report has been prepared to identify if there are any more suitable sites to accommodate the Proposed Development subject to this planning application.
- 6.2 The Search Area encompasses a 3 km radius around the proposed PoC and is constrained by a mixture of factors, including agricultural land of higher or equal grade, areas of Flood Zone 2 and 3, and areas of topography with a slope greater than 10%. There is extremely limited availability of a lower agricultural land classification grade to the Proposed Site within the Search Area according to the nationally available Provisional ALC data, with only one very small area of Grade 4 land of insufficient size to the east of the Site.
- 6.3 Analysis of the previously developed land search identified four sites within the Search Area, which were all of sufficient size to be suitable for the Proposed Development and therefore added straight to the short-list.
- 6.4 All four sites were located over 2.45 km from the PoC, significantly further than the Proposed Site, rendering them almost certainly unlikely to be commercially viable. In accordance with paragraph 4.3.27 of EN-1, *“alternative proposals which mean the necessary development could not proceed...can be excluded [from the site selection report] on the grounds that they are not important and relevant”*. Furthermore, they all had further limiting factors, including proximity to heritage and environmental designations, likely conflict with NFCC guidance, and areas of Flood Zone 2 and/or 3. Given the sites form Local Plan allocations, there were limiting factors in terms of policy constraints or due to the allocations being made up of several lots that would need to become available via sale / auction to provide a sufficient size of land to accommodate the Proposed Development, and therefore unlikely to become available to the Applicant. These would likely lead to difficulties when designing and constructing an ESS, which would likely decrease total capacity and increase total cost.
- 6.5 Nevertheless, as mentioned above, the need for renewable energy, including energy storage, is so great that if any suitable alternative sites are identified in this assessment which could in principle be deliverable, they should also be bought forward alongside the Proposed Development without delay in order to meet the well referenced demand, and this would not, therefore, justify the refusal of the Proposed Development, as set out in paragraph 4.3.24 of EN-1. More information on the scale of need for renewable energy, and in particular energy storage, can be found in the PDAS.

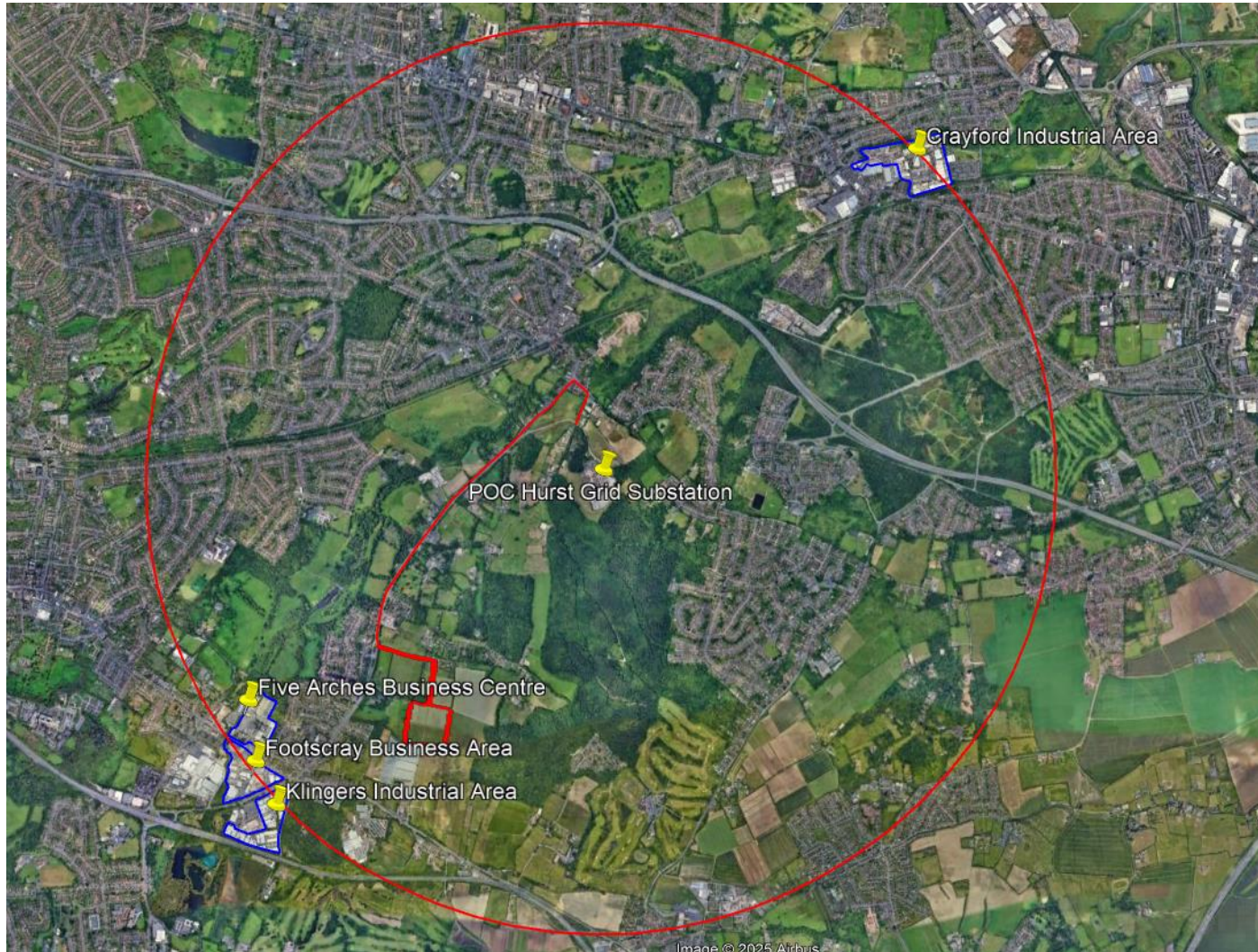
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- 6.6 In light of the above, this Site Selection Report has systematically assessed all previously developed land and agricultural land within a 3 km radius of the PoC. It has concluded that there are no reasonable alternative locations of lesser environmental value on which the Proposed Development can be viably located.
- 6.7 With regard to this, the Applicant believes that the need for the development along with the conformity and support of local and national planning policy means this type of development is considered acceptable, subject to appropriate mitigation. Paragraph 168(a) of the NPPF (2024) outlines that renewable energy and low carbon projects do not require justification by the applicant and that developments of this nature should be approved if the impacts are acceptable.

**APPENDIX 1: FIGURES 1 – 5 (GIS FIGURES)**



## APPENDIX 2: FIGURE 6 (SHORT-LISTED SITES)

### Shortlisted sites





Shortlisted sites with Green Belt overlay

