DWD

Statement of Community Involvement

NORTH CRAY ROAD ENERGY STORAGE SYSTEM (ESS)

LAND AT NORTH CRAY ROAD, SIDCUP

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Revision	Description	Originated	Checked	Reviewed	Authorised	Date
1.0	FINAL	BS	CD	CD	CD	April 2025
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1.0 INTRODUCTION

Introduction

1.1 This Statement sets out the process of community engagement that has been undertaken by Net Zero Thirty Two Ltd (the 'Applicant', with the application being managed by Firstway Energy) to inform a planning application for the installation of up to 200 Megawatts (MW) Energy Storage System (ESS) development on land at North Cray Road, Sidcup, London.

1.2 The Applicant recognises the importance of pre-application consultation and creating opportunities for local residents to engage in the planning process for new development. With this in mind, a programme of public consultation has been undertaken that meets the recommendations outlined in the London Borough of Bexley's ('LBB' or 'the Council') Statement of Community Involvement ('SCI') (2019).

1.3 This Statement of Community Involvement provides further information on the consultation exercise undertaken in respect of the Proposed Development.

London Borough of Bexley Statement of Community Involvement (2019)

1.4 The LBB SCI was formally adopted by the council in July 2019. The LBB SCI sets out how they will engage with the community on planning matters, outlining opportunities for communities to participate in the planning process for development within their local area.

1.5 The LBB SCI sets out a number of 'Community involvement principles' within the introduction, which seek to effectively involve the community in all aspects of the local planning process. This is done by ensuring that:

- consultations are inclusive, appropriate and fit for purpose;
- information is clear and accessible to all;
- people feel confident that they can engage effectively in the process;
- there is opportunity for early engagement;
- the scope of consultations is clear from the start; and
- feedback is provided to show how responses have been considered as part of the process.

1.6 The LBB SCI states that developers are encouraged to discuss their proposals with planning officers, statutory consultees, neighbours to the development and wider public where relevant. Where major development is proposed, the LBB SCI encourages discussions with officers that will cover

possible methods of and timescales for pre-application publicity that applicants may wish to undertake on their proposals. This may include public exhibitions or meetings which will inform residents and interested groups.

1.7 It goes on to state: "*Genuine and sustained early engagement with the local community is encouraged, prior to the working up of proposals for the pre-application stage, in order to help shape and inform what is appropriate for the site. This could happen over several stages, allowing the community to see how their involvement has informed the development proposal or a detailed explanation where it has not*."

1.8 DWD Property and Planning Limited and Net Zero Thirty Two Limited have carefully followed the guidance in the LBB SCI and are pleased with the substantive responses that have been received from interested parties.

2.0 PRE-APPLICATION ENGAGEMENT WITH THE LONDON BOROUGH OF BEXLEY

Pre-application Enquiry

2.1 Prior to the submission of the planning application, pre-application advice was sought from the LBB (Ref: 25/00139/PREAPM).

2.2 The formal pre-application advice response was received from LBB on 11 March 2025, with the Case Officer acknowledging that: *"The principle of the erection of a Electric Storage System (ESS) is considered acceptable for the purposes of addressing the ongoing climate emergency, however the land designation of the site as green belt is problematic. There may be demonstrable very special circumstances (VSCs) and/or potential justification for development in this location relating to 'grey belt' for erecting the facility on Green Belt designated land. However, these must be robustly presented in the submission of a full planning application."* The Applicant met with the Officer via teams on 11 March 2025 to discuss the pre-application request.

2.3 The Pre-App advice outlines that *"There is the potential that the site could be argued as 'grey belt' against the definition provided within the NPPF. The applicant/their agents then really need to focus on the requirements of paragraph 155, specifically a). where it needs to be demonstrated that the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Alternative sites would also need to be explored to meet e). If these matters cannot be addressed/demonstrated to officers' satisfaction, then we should revert to considering the site as inappropriate development and [consider] against VSCs."*

2.4 The LBB pre-application advice also made reference to paragraph 161 of the National Planning Policy Framework ('NPPF') (2025) which advises that: *"the planning system should support the transition to net zero by 2050, taking full account of climate change. It should help to contribute to a radical reduction in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure."*

2.5 The Officer's advice note outlined the following additional considerations in assessing the level of acceptability:

- Principle of Development – Green Belt;
- Principle of Development – SINC & Ancient Woodland;
- Principle of Development – Alternative Site Selection;
- Design & Impact on Character of Local Area;

- Neighbour Amenity;
- Transport;
- Ecology & Biodiversity;
- Waste (inc. Excavated or Imported Material(s) and Spoil);
- Safety & Security (inc. Fire Safety);
- Climate Change & Environment;
- Drainage & Flooding;
- Contaminated Land;
- Agricultural land classification; and
- Structural stability of land.

2.6 The Pre-application Advice also confirmed that whilst part of the Site is located within an area designated as a Mineral Safeguarding Area under the Bexley Local Plan policies map it is unlikely that the proposal would have any impact on this designation given that the area will only used for access, utilising existing access tracks and roads.

2.7 Since the receipt of the formal pre-application response, a pre-application meeting has been held via MS Teams with LBB on 11 March 2025 primarily to discuss the construction routing and site access considerations. In the meeting it was raised that there is a locally listed building (Manor Farm farmhouse) which adjoins the site access.

2.8 Since that meeting it has also been confirmed via email correspondence on 25 March 2025 that:

- An Energy Statement is not be required as the Proposed Development is in essence energy storage in the UK is considered as low carbon energy generation;
- Referral to the GLA may not be required given the floorspace of the Proposed Development does not meet the minimum stated in Category 3D in the TCPA (Mayor of London) Order 2008;
- The Proposed Development is not be CIL liable as it does not comprise gross internal area;
- Viewpoint 10 would be retained as it shows the potential impact of the new access and localised vegetation clearance and an additional viewpoint would be included in the location on North Cray Road as requested by LBB; and

- A Construction Traffic Management Plan (CTMP) should be submitted with the planning application and a Construction Environmental Management Plan (CEMP) can be secured by way of a planning condition.

2.9 The Planning Application is supported by a comprehensive suite of technical reports and assessments, which robustly assess the impacts and provide recommendations. The proposal addresses all matters raised at the pre-application stage, and the Applicant will continue to work with the Local Planning Authority and the relevant statutory consultees throughout the determination of the application.

2.10 The full pre-application response from the LBB Case Officer is included at the end of this document at **Appendix 1**.

EIA Screening Request

2.11 The Applicant submitted a request for an Environmental Impact Assessment ('EIA') Screening Opinion from the Council on 23 January 2025 (Reference 25/00137/SCREEN) and an acknowledgement was received on 28 January 2025 from the Council.

2.12 On 19 February 2025 the Council issued a Screening Opinion to the Applicant which confirmed the Proposed Development did not constitute 'EIA development'. A copy of the EIA Screening Direction is contained at **Appendix 2**.

3.0 PRE-APPLICATION PUBLIC CONSULTATION

Introduction

3.1 The aim of the public consultation programme has been to inform and engage with the local community and stakeholders, and provide the opportunity for them to express their views in line with the LBB SCI. Key stakeholders were consulted as part of the pre-application consultation, including the London Fire Brigade, the Ward Councillors for St Mary's and St James, senior officers at the London Borough of Bexley, Cabinet Members for Communities and Housing and Shadow Members for Housing, Climate Change, Transport, Environment and Leisure..

3.2 The following methods of engagement were undertaken:

- Letters posted to 1477 addresses on 21 January 2025;
- Letters posted to key stakeholders identified above; and
- Development of a Project Website providing information on the Proposed Development that went live on 23 January 2025.

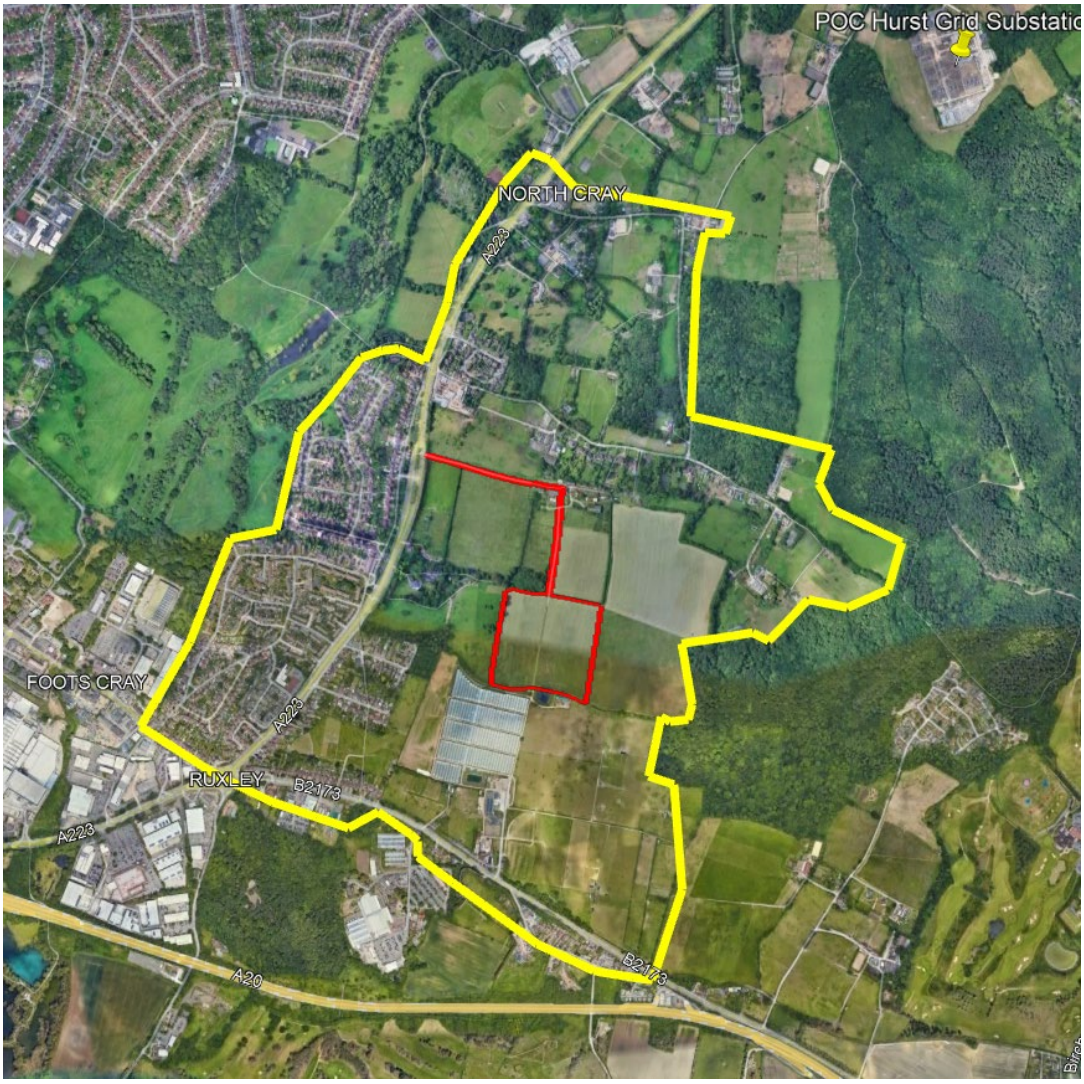
3.3 The above methods are discussed below in more detail.

Consultation Letters

3.4 The Applicant elected to undertake a targeted maildrop to 1,477 addresses located within a specified area surrounding the Site as shown in Figure 1.

3.5 The area of the consultation (shown at Figure 1) was determined based on the aim of consulting all of the residential settlements/villages and businesses within the vicinity of the Site. Other residential areas, such as the one beyond the Industrial Area west of the site, were scoped out due to their distance from the Site and intervening development.

Figure 1: Map illustrating the consultation area



3.6 The maildrop included a consultation letter and the Site Location Plan to provide the description and context of the Proposed Development. The letter also directed recipients to the project website (www.netzerothirtytwo.com) which provided a more comprehensive description of the proposals and project timelines. A project email address was also included within the consultation letter to provide recipients with the opportunity to contact the project team. A copy of the letter to residents can be found in **Appendix 3**.

3.7 The consultation period lasted for just over 4 weeks, beginning on the 23 of January 2025 and concluding on the 21 February 2025.

Consultation Letters to Key Stakeholders

3.8 The Applicant elected to undertake a maildrop to key stakeholders on 23 January 2025.

3.9 The maildrop included a consultation letter and site location plan to provide the description and context of the Proposed Development. The letter also directed recipients to the project website (www.netzerothirtytwo.com) which provided a more comprehensive description of the proposals and project timelines. A project email address was also included within the consultation letter to provide recipients with the opportunity to contact the project team.

Consultation Website

3.10 A project website outlines details of the project and how to provide comments was launched on 23 January 2025. The project website provided visitors with information on energy storage systems, government policy, details of the Proposed Development and plans showing the location of the Site and an early stage indicative layout.

3.11 Website visitors were also provided with the opportunity to submit a feedback form or provide comments via the project email address.

3.12 The link to the project website can be found here: https://www.netzerothirtytwo.com/ with screenshots also provided for reference at **Appendix 4.**

3.13 In terms of website visitor data collected, there were 1097 individual page views throughout the period of the consultation, with 723 unique visitors.

4.0 SUMMARY OF CONSULTATION REPORTS

4.1 During and since the close of the consultation period (23 January 2025 to 21 February 2025), 41 responses were received between the project email address and project website. The Applicant has provided responses to the comments and concerns raised by the public in Table 4.1 below on the following page.

Table 4.1: Summary of Consultation Responses

THEME	SUB THEME	EXAMPLE COMMENTS	APPLICANT's REGARD HAD TO COMMENTS	CHANGES MADE TO PROPOSED DEVELOPMENT
Land Use & Agricultural	Loss of Agricultural Land	*"This is agricultural land for agricultural use only"* *"The area at present is open farm land and should not be used for industrial development as there are better locations, GREY SITES, that would be better suited for this type of development."* *"The North Cray Road site is high quality farmland. The plans state that the facility would be temporary and then return to farmland. Would there be any lasting impacts on the land that would lower its agricultural land classification?"* *"The North Cray Road site is high-quality agricultural land. It is inappropriate to develop energy storage facilities on farming land, especially when the classification of agricultural land is best and most versatile, as I understand it to be on this site. This land should be reserved for food production - not hosting a poorly located energy storage facility."* *"This has the potential for significant noise levels destroying what is currently a very quiet*	The Site comprises a mixture of Grade 2 and Grade 3 agricultural land according to nationally available provisional Agricultural Land Classification ('ALC') data, which does not distinguish between Subgrades 3a and 3b. The Applicant acknowledges that the land may be Best and Most Versatile ('BMV') and that agricultural land is a valuable resource, and is currently undertaking a site-specific ALC survey to confirm the precise Grades. 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. The Applicant has prepared a Site Selection Report (SSR) which sets out the methodology for assessment of additional sites within a 3km search area of Hurst Grid Substation. The SSR concludes that no suitable additional sites are available within the search area.	No change. Please see the submitted SSR and PDAS for more information.

		and peaceful area of Bexley and would cause unnecessary annoyance and distress to its many nearby residents."	More information regarding the selection of the site and the justification that the Site is within the Grey Belt, and therefore is not 'inappropriate development', can be found in the following submitted documents: ○ Planning, Design and Access Statement (PDAS) ○ SSR ○ Green Belt Assessment Report	
	Use of Green Belt	*"the two facilities you propose sit on protected green belt land. What other sites that may be more appropriate have you considered for these facilities? It appears that this type of development would ordinarily be inappropriate in a green belt location unless very special circumstances exist to render it acceptable. Do you consider that such circumstances exist and have you chosen these sites instead of other locations?"* *"Unwanted on the green belt around Bexley village. It will ruin the area."* *"I don't agree with eroding the green belt with industrial complexes. If such a complex is required, it must be on redeveloped land with the same conditions of use, NOT green belt land."*	The Applicant has set out that the Proposed Development complies with planning policy, including the new 'Grey Belt' policy, introduced in December 2024. It is considered that the Site is Grey Belt land and that the Proposed Development satisfies the relevant policy tests to be deemed as 'not inappropriate' development within the Green Belt. National policy confirms that if development is 'not inappropriate' development, then it is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness, and would not need to set out a case for 'very special circumstances'. Notwithstanding, the Applicant has included an assessment of these aspects in the event that the LBB does not deem	No changes

		"I believe this is Green Belt land and your proposal will be the thin edge of the wedge" *"Since this is Green Belt land, I would strongly prefer to leave it as such - either undeveloped or used for farming."* *"This land is designated Green Belt and as such supports a wide variety of wildlife, including the horses and stables on this land. As such it must retain its Green Belt designation… Could this facility not be built in a more industrial part of the borough?"* *"Neither the Bexley Local Plan nor the London Plan prioritise energy infrastructure over the protection of the Green Belt."*	the Site to be Grey Belt, and that the Proposed Development would be 'inappropriate development' in the Green Belt. This assessment concludes that the Proposed Development would not give rise to unacceptable environmental effects and when all of the benefits of the Proposed Development are combined, they clearly outweigh any harm to the Green Belt and any other harm, and that Very Special Circumstances exist. Please see the submitted Green Belt Assessment Report submitted with this application. The environmental and technical reports that form part of the planning application submission demonstrate that there would be no unacceptable environmental impacts, such as to local ecology or landscapes.	
Hazards, contamination and Safety	Fire Safety	*"both sites are near residential homes and ancient woodland, so fire safety is a top concern for residents, given the risk of fires. Guidance from the National Fire Chiefs Council (NFCC) requires energy storage systems to have at least two access points to account for opposite wind directions."* *"The NFCC suggests a minimum space of six metres between battery units to prevent fire spread and restrict access. Both sites show that*	Energy Storage Systems are safe to construct and operate. The Proposed Development will be operated and managed in line with the latest standards and regulations as set out in the submitted Outline Energy Storage Management Plan (OESMP). The Applicant has engaged in pre-application discussions with London Fire Brigade, however, no response has been	The proposed layout has been updated in-line with the NFCC draft guidance.

		battery units would be grouped rather than spaced. Do the plans incorporate suitable design features to justify the reduced distances based on designs by a competent fire engineer?" *"Has the London Fire Brigade been informed?"* *"I've read your Q&As and a bit stunned that you're suggesting that 'water' be used on electrical fires! Surely this is wrong.* ** Please can you advise what non-water fire management will be available on-site"* *"I have concerns of safety as regards from potential fire from high powered generators"* *"the land selected is both near woodland, farmland with hay storage, polytunnels and a built up residential area. The safety record of lithium batteries and difficulty in extinguishing fires is well document, including by the planning Inspectorate."*	received at the time of submission of the planning application. London Fire Brigade will be formally consulted by LBB with regard to the full planning application. The proposed Indicative layout has been informed by the National Fire Chief Councils (NFCCs) 'Draft Guidance on Grid Scale Battery Energy Storage Systems' (2024), and includes two separate access points to the ESS compound, 6m separation between the nearest adjacent ESS clusters, and a minimum of 10m separation to the nearest existing and proposed vegetation. Each battery cell / container has inbuilt fire suppression measures within it, such as foam, to manage fire. The water tanks are used as a last line of defence in the design of the layout to minimise fire spread. This is achieved by applying water around the cell / container to cool the air in order to minimise the 'thermal runway' (e.g. the spread of fire by heat), rather than the water being applied to the electrical equipment directly. More information regarding fire safety and management, and how the Proposed Development complies with the NFCC draft Guidance can be found in: • The OESMP.	

			• PDAS Appendix 5	
	Health risk	*"we do not know what the long term health effects will be to local residents and also to local wildlife."* *"We would need evidence to show that it would not be emitting dangerous levels of radiation which is huge risk to public health. A radiation detection monitor would show such level however, we would be wanting to discuss this in full and receive the evidence that such a storage project would be safe and not affect the health of our family and the people on the estate."* *"There are residential sites immediately adjacent to the North, West and South-West of the proposed development site and it is unacceptable that the residents' environment and welfare be put at risk"* *"Would there be any health hazards having electricity stored so close? And also gas pipes?"*	The procured Energy Storage Units must comply with the relevant standards and do not impact or produce electromagnetic fields and they do not produce gasses, pollution or chemicals during operation. Energy Storage Systems are safe to construct and operate. The Proposed Development will be operated and managed in line with the latest standards and regulations as set out in the submitted OSEMP.	Please see the submitted OESMP and PDAS for more information.
	Contamination	*"Due to the potential hazards on site it needs to be ensured that the water runoff cannot flow into local rivers of which there are several nearby to these sites, in particular the River Cray and the beautiful 'Five Arches' beauty spot is within 600 metres of the proposed location of the North Cray site and immediately upstream of it... Any contamination of these areas would devastate the wildlife and totally ruin the*	It is proposed that runoff from proposed ESS compound will be contained in the sealed gravel base beneath the infrastructure to detain contaminated water in the unlikely event of a fire. Therefore, the gravel bases would provide the storage and the infiltration basin would provide the discharge destination. Further details of the	The ESS infrastructure has been located outside of areas of mapped risk of surface water flooding, with the exception of site access tracks which would be made of permeable

		attractiveness of the area for many, many years and remove the attraction of the area to potential homeowners and businesses to the area, thus having huge negative implications for the wellbeing and success of the area." *"The layout of the site does not show any method of collecting any water run-off to protect against contamination of local watercourses. Any risk of contamination of this river and these areas simply should therefore not be permitted."*	management of surface water run off can be found in the submitted Flood Risk Assessment and Drainage Strategy (FRA and DS). There is not considered to be any adverse risk of local contamination during the operation of the Proposed Development.	material and is not sensitive infrastructure. Please see the submitted FRA and DS.
Amenity	Residential amenity	*"…the development prejudices the privacy of adjacent residents contrary to their reasonable expectations, which endangers the residents' rights to the peaceful enjoyment of their properties."* *"An 18-month construction period will be intolerable particularly as we enjoy spending our time relaxing in our garden. Our enjoyment will be greatly reduced and will no doubt have an adverse effect on our health."*	The ESS infrastructure would be largely unoccupied, with only a 1-2 maintenance workers visiting the Site each month as necessary. It is therefore not considered that residential privacy would be adversely impacted during operation of the Proposed Development. The Applicant has submitted a suite of technical reports (such as a Noise Assessment; Landscape, Townscape and Visual Impact Assessment [LTVIA] and Construction Traffic Management Plan [CTMP]) which set out how impacts to amenity will be kept to a minimum and mitigated against as appropriate.	The layout has been sited to locate ESS infrastructure as close to the existing polytunnels in the south to provide greater separation to nearby sensitive receptors. Please refer to the submitted PDAS, CTMP, Noise Assessment, LTVIA, and Health Impact Assessment.
Socio-Economic	Community Benefits and CIL	*"The facilities would not serve the local community directly. What community benefits would Bexley Village, Coldblow, and North Cray receive if they hosted this infrastructure?"*	Whilst there are no specific direct community benefits, the Proposed Development will directly contribute to the Clean Power 2030 Action Plan and	N/A

		"Sites should certainly not be considered just because of their easy connection to the National Grid but, more importantly, for the benefit of the local community." *An expectation for Community Infrastructure Levies especially for local nature projects on or around the River Cray.*	other relevant climate change acts. The Proposed Development will contribute to the shift towards net zero and contributes to energy security. More information on the 'Need' for this kind of development can be found in the Planning Statement. The Proposed Development does not comprise 'gross internal area' and therefore would not be CIL liable development.	
	Economic Effects	*"If this development goes ahead it will also impact negatively on our house prices too and having this next to us residential definitely effect on our health soon."* *"Having lived here for over 30 years, we are also seriously concerned about the devaluation of our property and could definitely do without these concerns at our time of life."* *"..the construction would be visible from my house and would devalue it.."*	There is no evidence to suggest that ESS developments have reduced house prices in this country. House prices have continued to rise in England since the introduction of ESS. House prices are not a consideration in the planning process.	N/A
Biodiversity and Wildlife	Biodiversity	"*Residents are concerned about the impact of both proposals on the natural environment. Would you seek advice from the London Wildlife Trust regarding your proposals to confirm the effects on biodiversity and verify your mitigations independently?*"	The impact of the Proposed Development on biodiversity is considered in the submitted Ecological Appraisal (EcIA) and Biodiversity Net Gain (BNG) Assessment which form part of the planning application. This includes a Phase 1 Habitat Survey, scoping survey for	The layout has been sited to provide suitable 'no development buffers' to ecological features and siting the ESS infrastructure away from outlier badger

		"*Will you maintain the care for the new hedgerows and grasslands to promote ongoing biodiversity over the 40-year life span?*" "*Our Society strongly supports the need to improve biodiversity and to maintain space for nature. This wide, low level new industrial complex is in total variance to that aim. It will increase light pollution, decrease open land and put native trees at risk*." "*As part of Bexley's remaining countryside, the North Cray Road site also hosts the same nature-supporting landscape. However, there is still no detail on this location or independent evaluation showing how a biodiversity net gain of 10 per cent is achievable alongside the clearance needed to prevent fires from spreading and allow the LFB access to the site.* "	protected species, and further Phase 2 surveys for badger, Hedgerow Regulations 1997 and wintering birds. In terms of protected species, the Site has the potential to support foraging bats, reptiles, dormice, voles, and hedgehogs, despite none found during field evidence / surveys, and the status of the outlier badger sett may change prior to construction. In terms of nesting birds, the most activity of birds was within the boundary hedges and the only birds seen over the Site were flying over and the habitats are intensively managed and unlikely to be used by ground-nesting birds. The EcIA submitted with the application concludes that subject to the inbuilt mitigation measures, there would be no residual impacts to European/ International designated sites, national designated sites nor non-statutory designated sites during construction and operation. The assessment makes 'avoid by design' and 'mitigation by design' recommendations which have been factored into the design of panel and infrastructure layout, and/or the landscape strategy: • Retaining hedgerows (where possible) and trees (it is not	setts. A robust Landscape Strategy Plan has been developed which retains and enhances existing vegetation and introduces new landscape planting. Please refer to the submitted EcIA and Landscape Strategy Plan.
	Wildlife	*"Its surrounding land, due to the immediate proximity of Joydens Wood, has thriving wild life which would, no doubt, be threatened/affected by the risks associated with this development – especially fire risks and contamination."* *"This will destroy our local area with a threat to humans and wildlife. We have very little wild rural land left in this area."* *"There is a lot of wildlife on this land. I have seen foxes, badgers, rodents and rabbits. Birds of prey have also been seen hunting here. There are also horses stabled close-by, and many*		

		butterflies and bees in the summer. Any developments - but particularly one with an 18-month construction period - would disturb the natural ecosystem and any habitats on the planned site."	anticipated that any trees would need to be removed); • Introducing new planting, including new boundary hedgerows with trees, mixed native shrub planting, new hedges and linear woodland features within the Site; • A minimum 30m 'no development' buffer to the outlier badger sett, and planting around the sett with fruit trees to provide an enhanced foraging resource; • Biodiversity protection zones along retained notable habitats and hedgerows; • Tool-box talks; and • Pre-construction nesting bird surveys and scheduling certain works to avoid the breeding season of nesting birds, such as clearance works, habitat manipulation. The submitted BNG Assessment and Metric, indicates that modified grassland would be replaced by hardstanding and buildings. Other species rich grassland around the ESS margins, a small block of mixed native scrub in the north-west and other new trees, hedgerows and linear	

			features will allow for BNG of over +80% habitat units and +20% hedgerow units. A Habitat Management and Monitoring Plan (HMMP) will be prepared and submitted by LBB prior to the commencement of work for 40 year management of landscaping and biodiversity enhancements. Construction lighting would be limited to the approved construction hours and any operational lighting will be motion activated security lighting.	
Landscape & Visual	Visual impact	*"I am concerned regarding the visual impairment of this development if it were approved. There appears to be no indication of its height and where it may be visible from. Underground cables are mentioned on the website but, albeit in a simplistic diagram, a pylon is shown. Clearly the erection of a pylon(s) is unacceptable."* *"The site location is on high ground compared to the surrounding area. It will be seen from miles around."* *"This is greenbelt land I moved here for countryside views."*	The planning application is supported by a Landscape, Townscape and Visual Impact Assessment (LTVIA) which includes supplementary photomontages showing the Site (baseline) and the Proposed Development at year 1 and year 10 (once proposed planting at the Site has matured). Photomontages have been provided for the most elevated viewpoints on nearby public rights of way and surrounding areas. The ESS compound is set within a low lying position within the landscape/ townscape forming part of the valley floor, thus avoiding elevated areas.	The ESS layout has been sited to be on the lower lying ground and near to polytunnels adjoining in the south. The Landscape Strategy Plan has included the following measures to minimise visual impacts from the proposed ESS: • retain and enhance existing vegetation on

		"North Cray is a very important area for it's open and green views. Our Greenbelt is under constant threat." *"When the projects are finished will they be screened from the road?"*	Further to this, equipment has been designed to limit height of equipment in contrast to potential taller equipment and with careful choice of rendering for the ESS containers and palisade fencing (i.e. dark green tone) to reflect the surrounding landscape. The LTVIA concludes that the higher tier construction effects (major and moderate adverse) would be localised to receptors in close proximity to the ESS Site, including recreational receptors along public footpath FP141 to the south, and residents in a more elevated position within the landscape to the north and south, albeit these would be temporary. Higher tier operational effects would be from close range views of the ESS from Footpath 141 however would reduce to 'minor adverse / neutral' at Year 10 as planting matures. Further to this, the LTVIA confirms that views from all other PROW/recreational receptors would range from 'negligible adverse' to 'neutral' at Year 10 as planting matures. Therefore there are no residual significant adverse effects to road users. The LTVIA confirms that views from road receptors on B2173, A223, North Cray Road, Parsonage lane and A2018 would	the boundaries of the ESS Site. • new native scrub along the southern edge of the ESS Site to form an understorey layer of existing planting. • new native tree planting in south-east to screen views from PRoW. • a woodland belt across the central part of the ESS Site. • new fruit trees in the north-west.
	PRoWs	*"From studying the Definitive Map of Bexley Rights of Way it would appear that this proposed development is likely to have an impact on the downhill view from footpaths 140 and 233 that run through Chalk Wood, thus spoiling a currently pleasant view."*		

			range from 'negligible adverse' to 'neutral' at Year 10 as planting matures. Therefore there are no residual significant adverse effects to road users.	
	Landscape character impact	*"Adding grassland and hedges will not compensate for the enormous damage that will be done."* *"it would be expected that this development should be considered inappropriate based on the character of the land being an open agricultural field which also supports local wildlife."* *"It would be expected that this development should be considered inappropriate based on the character of the land being an open agricultural field which also supports local wildlife."*	The LTVIA concludes that the higher tier landscape effects would occur during construction, of which the effects are temporary, and during operation at the Site level due to the change from an undeveloped field to an ESS. There would also be landscape effects on the host Local Townscape Character Area (LTCA) 2: North Cray Arable within which the Site is located however these would only be perceived at a very local scale and from few publicly accessible locations due to the small and consolidated layout of the Proposed ESS. These landscape effects are predicted to reduce to 'negligible adverse' to 'moderate adverse' with the maturation of the proposed planting at Year 10 allowing for greater physical and visual enclosure of the ESS Site. There would also be beneficial changes associated with changes to vegetation cover and biodiversity opportunities from the proposed Landscape Strategy Plan.	The layout of the ESS compound has been positioned close to the existing polytunnels in the south which are a similar height, and away from residential receptors and elevated parts of the Site to minimise landscape and visual impacts. The substation, which is the tallest proposed element, has been positioned to be in-line with existing trees to soften any views to it.

	Cumulative landscape impacts and overdevelopment	*"Our worry is that this project will leave a loophole for further building works across Green Belt land."* *"The construction will undoubtedly lead to more construction."*	This planning application is for the construction of an ESS and associated development on land shown on submitted plan Ref. FST029-SP01_rev05. Any planning proposals outside of this land or for developments of a materially different nature (such as a solar farm) would need to be assessed by the Local Planning Authority individually on their own merits and should not preclude judgement on this application as proposed.	N/A
Noise and Vibration	Construction Noise	*"I have concerns of potential increased noise pollution from vehicles and machinery."* *"18 months is also a long construction period to tolerate as humans. As I largely work from home, I would worry about it disrupting my work. I also live with vulnerable relatives and would worry about the noise being too disruptive to them. In both instances, during the summer, when windows and doors are open, this would be exacerbated."* *"I worry about the construction noise to a quiet area and the visibility of pylons… During the construction period, what will the working hours be? "*	The construction period is expected to be 12 months. During the construction period, the construction hours would be 07:30-18:30 Monday to Friday and 8:00-13:00pm Sundays. Construction noise from the Proposed Development would not be significant at the nearest sensitive receptors, and any noise mitigation measures could be included in a Construction Environmental Management Plan (CEMP).	The layout of the ESS compound has been sited to locate away from noise sensitive receptors. Please refer to the Noise Assessment.
	Operational Noise	*"Once built, will I hear any electrical noise from the facility? It is not so far away, so I would expect to hear buzzing."*	The Noise Assessment submitted with the planning application concludes that noise impacts from operation of the Proposed	No changes.

		"I would prefer you to find somewhere else for your building as the countryside is an important part of this part of town and the noise would be disturbing. I am worried about the noise of the building and also after it is running, the electric noise." *"The massive batteries generate immense heat and as such will need equally massive cooling fans/systems. This has the potential for significant noise levels destroying what is currently a very quiet and peaceful area of Bexley and would cause unnecessary annoyance and distress to its many nearby residents."*	Development would not be deemed significant at the nearest sensitive receptors and specific measures are not required to prevent significant adverse effects.	
Transport	Construction Traffic	*"is the proposal to lay cables from the site along the dual carriageway and then continue along the single carriageway towards Bexley village to the roundabout with Vicarage road, then up Vicarage road? If so this will surely have a major adverse traffic impact on all local resident not mentioned on your website"* *"I have concerns on grounds of traffic congestion during construction and on going air pollution."* *"How will the construction traffic get to the site?"*	In terms of the cable connection works, these are proposed to occupy only a small amount of the road (typically the width of a bucket) when carried out. The CTMP submitted with the planning application includes measures to manage construction effects on the public highway in terms of traffic congestion and highways safety. The CTMP submitted with this planning application sets out the construction vehicle routing to and from the Site. Vehicles would access the Site via an existing agricultural / farm access track, which would be retained and improved,	No changes. Please refer to the CTMP.

			connecting to North Cray Road and providing onward access to the A223, with construction vehicles turning left-in to and right-out of the Site.	
	Operational Traffic	*"Also the increased possible traffic problems over the next 40 years cannot be estimated"*	Once the Proposed Development becomes operational, the frequency of vehicle movements would be much lower than in the construction phase and the vehicle types would generally be limited to maintenance visits by LGVs (generally two per month). It is estimated that one HGV trip may occur per annum to replace items / equipment, with no abnormal loads anticipated.	No changes. Please refer to the CTMP.
	Road Conditions	*"The farm access lane is barely capable of taking a car, let alone heavy construction traffic"* *"The amount and time span whereby heavy lorries would be using the North Cray Road will certainly cause both surface damage to a road that carries a lot of traffic and is in need of repair plus it is not made clear how these lorries will operate i.e. will they be in action on a continual 24 hour basis or are there set times of operation so that the residents get respite from the disruption ?"*	The Applicant's transport consultants have assessed the existing access arrangements and considers the site access to be suitable to accommodate the vehicles types required for the period of construction, subject to improvements including for visibility splays. The roads will be resurfaced and restored in respect of the cable trench area following completion of that respective section. The construction hours are detailed previously in this table. Further to this the CTMP includes management measures such as an HGV booking system to manage vehicle movements along the public highway network.	No changes. Please refer to the CTMP.

	Access	*"The junction, just 10 yards or so from the access lane, is already potentially deadly."* *"What you may not be aware of is that due to the narrowing of the road into Bexley village now we are often subject to hold ups that can take a long time to clear and causing massive nuisance."*	The Applicant's transport consultants have reviewed the Personal Injury Collision (PIC) data from Transport for London's Collision Data for the most recently available 5 year period (1/10/2019-30/09/2024) for the surrounding highway network in the vicinity of the Site does not indicate clustering of accidents that would indicate deficiency in the highway network that could result in an increase in accidents as a result of the Proposed Development, and therefore is not considered to have a significant adverse impact on highways safety. During the 12-month construction programme, two HGVs will typically access the Site per day, comprising one rigid bodied HGV (up to 10 m in length) and one articulated HGV. The Site would be able to accommodate sufficient area for HGVs to be held within the Site to avoid banking on the public highway network. As mentioned above, the CTMP includes management measures such as a HGV booking system.	No changes. Please refer to the CTMP.
Consenting		*"Has the Secretary of State given permission to build on Green Belt land, to build an electricity generation station, or a distributing or transforming station and control rooms?"*	The planning application would be submitted to the London Borough of Bexley for full planning permission under the provisions of the Town and Country Planning Act 1990 (as amended). As such,	N/A

			the Secretary of State is not the decision maker. LBB may wish to consult the Secretary of State prior to issuing a decision on the application in accordance with the Town and Country Planning (Consultation) (England) Direction 2024.	
Decommissioning and site restoration		*"Would the proposed installation be dismantled and land restored to its pre-developed state - moreover, who is going to do it?"* *"I have serious doubts that everything will 'return to normal' at the end of its life - I still recall the Dartford crossing would be free once the tolls had paid for it!"* *"I am sorry to say that the claim that in 40 years the site will be retuned to it's current state is without evidence and in fact, ridiculous. Firstly, demand for electricity storage will not fall away in 40 years although it may have become more efficient in it's use of land. Secondly, should it be decommissioned, the land is then classified as "brown field" and will be repurposed as housing or other industrial land."* *"explain how 40 years can realistically be regarded as temporary? Would you please explain what measures you'll employ to ensure the area cannot fail but be restored to how it is now."*	The Proposed Development would be temporary for the period of 40 years, after which time a Decommissioning and Restoration Plan (secured by condition) will be submitted to the Council in order to confirm details of the Site's full restoration. Once the Site is restored, the land would revert back to 'green field' land, not brown field.	N/A

Questions	Need for the development	*"Why is it that I cannot recall ever seeing or hearing on the TV, radio, national press or social media the Government announcing the need for a major national initiative in the development of ESS sites? It seems more the case that numerous companies have jumped on the bandwagon of seeing short-term huge profits being made from inflated climate change scaremongering and the need for the urgent development of ESS sites with no proven need or capabilities?"* *"Why, after 40 years (other sites have differing timescales), would the proposed installation be dismantled and land restored to its pre-developed state - moreover, who is going to do it? None of the companies involved in their development will be in existence and local communities will be left with dangerously decomposing huge battery units contaminating the sites whilst local councils try to avoid the cost of dismantling and restoring the land."* *"What test results can you show regarding interference with telephone, TV/radio and mobile phone signals? Because of the low level of most of North Cray, masts have needed to be installed to the side of the North Cray Road almost completely adjacent to the prosed ESS site."*	The UK Government has committed to meeting a legally binding target of net-zero carbon emissions 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 Government's Clean Power 2030 document (released in December 2024) forecasts how much energy storage we need to decarbonise the grid by 2030 – being 23-27 Gigawatts of battery capacity and 4-6 GW of long duration energy storage. Further to this, the London Plan (2021) includes a commitment for London to become a net-carbon city. Whilst LBB is yet to declare a climate emergency, the Council has published a 'Climate Change Statement and Action Plan 2022 to 2026', which aims to reduce carbon emissions and supports low-carbon energy. To achieve these targets, major investment is needed in proven technologies, such as renewable energy and energy storage. Energy storage proposals, such as the Proposed Development, help to support the development of renewable energy, which is intermittent by its nature, taking energy from the grid at times of higher	N/A

			supply/lower demand and feeding it back at times of lower supply/higher demand. This added flexibility is key if the UK is to achieve widescale reliance on renewable energy. Please refer to the PDAS for more detail.	
	Site design	*"Is the field on a flat (or lower) behind the polytunnels? Or is it on a hill that rises above the polytunnels? Is it correct that the tallest structures will be 7 metres high?"*	The ESS infrastructure has been positioned within the low-lying parts of the main Site and in proximity to the existing polytunnels to the south to minimise landscape and visual impacts. The tallest element of the Proposed Development would be the 132kV substation at a height of 6.77 metres. It is important to note that the substation is permeable in its appearance in the sense that it does not comprise a solid building structure.	No changes.
	Application documents	*"We would like to see these drawings scale 1:1000, showing measurements from the development site to Maidstone Road or Honeydale Farm boundary line:* • *Drawing No. SP01 Revision 2* • *Drawing No. PL02 Revision 2"* *"Could you provide a bigger plan please, the scale is far too small to have an appreciation of what you are proposing."* *"In addition, I should point out that the documentation provided in the application for*	The site location plan (SP-01) submitted with the planning application is at a scale of 1:5000, the indicative site layout (PL-01) submitted with the planning application is at a scale of 1:2500 and the Proposed Site Layout Plan is submitted at a scale of 1:1000. This scale is required to ensure the full extent of the red line application area is included. The North Cray Road ESS will have an electrical / import capacity of up to 200	No changes.

		these two BESS stations is incomplete and, as a result, misleading. They state capacities of 200 MW and 212 MW for the North Cray and Bexley Village sites respectively suitable for powering over 647,590 homes and 687,822 homes respectively. However, these are battery storage systems, NOT power plants, so these 200 and 212 MW will only be able to provides power to these homes for a short period unless the batteries are being continuously recharged... My estimate would be in the region of 800 MWh which means that the circa 200 MW power could only be provided for around 4 hours which would be of very limited use in periods of limited sun and wind. Additionally, I do not agree with the numbers of homes that can be powered by these plants has been overstated. In wintertime the average daytime (7am to 11pm) electricity use of a home is about 0.55 kWe. Hence a 212 MWe plant would be able to power only around 385,000 homes, not 687,000 and only for a few hours if the BESS isn't being recharged. Therefore the application is incomplete and gives a more favourable impression of this BESS than is actually the case."	megawatts, capable of powering 648,889 homes for 2 hours.	
	Cable route corridor	*"Whilst pleased that there will be no pylons, there's no indication on the plans as to where the underground cables will route - nor any comment on the distruption required for their installation* ** Please can you provide full details of the cabling?"*	The Site would be connected to the Hurst Grid Station via underground cable connection. Cabling within the Site would also be located underground. There are no overhead cables or pylons proposed. The cable connection route (between the Proposed ESS and National Grid Land)	N/A

		"There are no markings on the drawings showing 3x underground cable connections connecting to Honeydale Farm or to Maidstone Road, or including gas pipes and pylons carrying aboveground cables." *"Is this work exempt from Building Regulations and Highways?"* *"The plans show overhead feed to the site? The written details state underground cabling?"* *"I also note that the plans include overhead cables. Will pylons be erected for these? How tall will they be and where will they be positioned? When the site is restored after 40 years, will that include removing the pylons?"*	would run northwards along the access track, before joining North Cray Road and travelling westward to join the A223. It would then continue northwards along the A223, before turning onto the A2018 and turning again onto Stable Lane. It then continues southwards along Stable Lane where it will meet an unnamed access road to the east that is a part of National Grid land. Once it reaches National Grid land, the underground cable will travel southeastwardly along this road until it reaches the Hurst Substation compound, at which point all works within the substation will be undertaken by National Grid.	
	Site security	*Security of the sites what will this look like? will it involve security lighting and a concern for light pollution for both the natural environment and people.*	Access to the Proposed Development Site will be strictly controlled. Operational security of the Proposed Development will be achieved by providing suitable fencing around the ESS compound Area perimeter (up to approximately 2.4m in height). Site security will be continuously remotely monitored via the use of CCTV/ security cameras utilising infra-red (invisible) lighting (attached to emergency lighting columns, approximately 3.0m in height).	No changes.

	Local employment	*Any employment or other opportunities for the local communities?"*	Where possible, local suppliers will be used during the construction of the proposed development	N/A
	Impact on substations	*"I just wondered if that will have any impact on the sub stations? (Not sure if that is the correct term). We live at* [address redacted], *next to one."*	The proposed development will not have an impact on the operation of substations other than to assist the grid in the provision of electricity.	N/A
	Consultation radius	*"As a member of the local residents association - the North Cray Residents Association - please may I ask whether you have also delivered to its members in North Cray Road itself, Maidstone Road - and those in Honeyden Road and Barton Road, who will be impacted too. Particularly visually."*	The area of the consultation (shown at Figure 1 in this Report) was determined based on the aim of consulting all of the residential settlements/villages and businesses within the vicinity of the Site. This included North Cray Road, Maidstone Road (north-side properties), Honeyden Road, and Barton Road.	No changes.
	Power source and generation	*"No power will be generated local to the site and hence any power stored will have to have been import from somewhere. Why isn't the storage facility being sited where the "GREEN POWER" is being generated."* *"This type of development should be sited close to where the power is being generated, next to a solar farm or wind turbines. I object to this development."* *You also state that 647,590 homes could be powered by this structure. What homes? New ones that others would also try to build on this land?"*	The proposed North Cray Road ESS would be standalone energy storage, effectively charging up from the grid during periods of low demand (when there is surplus) and releasing the energy back to the grid (via Hurst Substation) during times of higher demand. It will take energy from the electricity grid when demand is higher or supply is lower, thus operating in either 'energy charge', 'energy storage' or 'energy discharge' modes while providing support balancing services to the National Grid.	N/A

		"Relevant in the clarification of this, is the number of homes that the facility will supply…. Since you seem to attach some importance to this (what to me is at present a meaningless) number, would you also please clarify whether this number of homes powered is achieved by supplementing some undefined level of energy being generated elsewhere, or whether it represents the number of homes that can be supplied when this is the only energy being supplied to those homes?... explain how long these homes can be supplied from the energy stored. Is it days or only hours – or even minutes?"		

5.0 CONCLUSION

5.1 DWD and Net Zero Thirty Two Limited has undertaken a comprehensive programme of public consultation that meets the recommendations contained within the London Borough of Bexley's Statement of Community Involvement (SCI). This has included circulation of public consultation letters to local residents, along with select individuals. A website outlining the proposal in more detail was also actioned and was mentioned within the letters. The Applicant also engaged with the London Borough of Bexley via a formal pre-application through the request of pre-application advice which was received on 11 March 2025.

5.2 The above programme of public consultation has provided an opportunity for local people to have their say on the proposal. The Applicant has taken on board the feedback received and provided responses to the comments via Section 4 of this Report.

5.3 It is considered that the Applicant has undertaken a meaningful pre-application engagement exercise with regard to the Proposed Development.

APPENDIX 1: THE LONDON BOROUGH OF BEXLEY PRE-APPLICATION ADVICE

Development Management
Place
Civic Offices, 2 Watling Street,
Bexleyheath, Kent, DA6 7AT
Telephone 020 8303 7777

The person dealing with this matter is: James Hughes
Email:

Our reference: 25/00139/PREAPM

Date: 11 March 2025

F.A.O. Rob Booth

BY EMAIL:

Dear Rob Booth,

Erection of an energy storage system and associated works and boundary treatment at Manor Farm, North Cray Road, Sidcup.

PROPOSAL

Advice is sought on the provision of a Battery Energy Storage System (BESS/ESS - used interchangeably through this report) and associated infrastructure including internal access roads, 2.4m-high security fencing and underground cabling to connect the ESS to the Hurst Grid Substation, approximately 1.45km to the northeast of the proposed ESS. The cabling would be laid largely adjacent to A223 ('North Cray Road'). Means of access to the site is proposed using an existing access point from North Cray Road and utilising existing private tracks to the north and east of the proposed ESS, with access through or via Manor Farm to the north, an occupied farmhouse and partially abandoned group of farm buildings.

OUTLINE OF SITE AND PROPOSAL

The ESS and associated infrastructure will occupy a fenced area of approximately 3.82 hectares of land, with associated access routes and underground cabling linking the ESS to the Hurst Grid Substation. The ESS will have a total electricity import capacity of 200 Megawatts (MW), which is capable of powering approximately 650,000 homes.

At this stage, there is no indication for what length of time the homes could be powered for. The ESS is proposed to be operational for a 40-year period, with the site then restored to its former state.

The site of the ESS is designated Green Belt land. In addition, part of the access route to the north of the ESS is on land designated as a Mineral Safeguarding Area. The route of the underground cabling is largely along North Cray Road, a London distributor road. The cabling route goes through North Cray Conservation Area. The ESS will be sited on agricultural land approximately 350m to the east of North Cray Road. This is a small area of woodland to the north of the field and the access point, which travels south from Manor Farm and ultimately the access to North Cray Road. Open agricultural land is to the east, with intensive agricultural consisting of fields covered by polytunnels. There are further undeveloped fields not used for agricultural purposes to the west, beyond an existing hedgerow. The nearest sensitive receptors are residential dwellings on Cornell Close approximately 215m to the west beyond an area of woodland. The land the ESS is proposed on is flat. However, the application site is a modestly lower elevation than surrounding land which gently slopes upward away from the site in all directions.

A plan has been submitted showing an additional structure associated with the ESS on the field to the east of the access point to the field. The submitted plan also indicates the presence of an existing gas main beneath the site. However, the gas main location appears indicative.

RELEVANT PLANNING HISTORY

No relevant history or nearby developments relevant to the proposed scheme.

RELEVANT PLANNING CONSIDERATIONS

<u>The Development Plan</u>

The adopted Development Plan for the London Borough of Bexley comprises; the Bexley Local Plan (2023) and the London Plan (2021).

The Development Plan for the area, which includes the Bexley Local Plan and the Mayor's London Plan, should be read in its entirety. Planning guidance produced by the Government, the Mayor of London, and by the Council expands on Development Plan policies and has material weight when taking planning decisions.

The London Plan, as the spatial development strategy for London, provides the strategic framework. It does not however preclude boroughs from bringing forward policies relevant to their areas where locally specific circumstances and evidence suggests this would not undermine the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan. The Local Plan does this. It is also silent where the London Plan policy does not require a local approach. The London Plan 2021 plan period runs from 2019 to 2041, and the

Local Plan to 2038. Longer term London Plan objectives may fall beyond the timeframe of the Local Plan although the key objective of sustainable development underpins both documents. The Local Plan contains strategic, non-strategic and site allocation (for residential and residential-led mixed-use development) polices along with supporting text.

Other material considerations

The National Planning Policy Framework (2024) acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. At the heart of the NPPF is a presumption in favour of sustainable development. The document forms a key and material consideration in the determination of any planning permission.

PLANNING ASSESSMENT

The main considerations include:

- Principle of Development – Green Belt
- Principle of Development – SINC & Ancient Woodland
- Principle of Development – Alternative Site Selection
- Design & Impact on Character of Local Area
- Neighbour Amenity
- Transport
- Ecology & Biodiversity
- Waste (inc. Excavated or Imported Material(s) and Spoil).
- Safety & Security (inc. Fire Safety)
- Climate Change & Environment
- Drainage & Flooding
- Contaminated Land
- Agricultural land classification
- Structural stability of land

CONSULTATION RESPOSNES

Strategic Planning

It is not considered that this site strongly contributes to the purposes of (a), (b) or (d) of Paragraph 143 of the NPPF (e.g. the site does not strongly contribute to these purposes). As assessment for 'grey belt' can only be assessed against (a), (b) and (d), it is considered that there is potential for it to be successfully demonstrated by the applicant that this site can be considered 'grey belt'. The assessment and justification would be that development on this site would not result in unrestricted sprawl of the built-up area (compliance with (a); that the development would not result in the merging with one another (compliance with (b)); and, that any development would not result in harm to the setting and special character of a historic town (compliance with (d)).

On this basis, the proposed development would then in turn be assessed against paragraph 155 of the NPPF, development including 'other development in the Green Belt', which this proposal would constitute. The development would need to be assessed against all parts of Paragraph 143, purposes of the Green Belt, including points (c) and (e). With regards to point (c), it is considered that there is potential that the development would result in encroachment into the countryside. The applicant will need to demonstrate that there is no encroachment. Or, if there is some encroachment, that the harm to the Green Belt caused by such encroachment would be negligible. There is no NPPF definition of 'encroachment' so a view would have to be taken when presented with a planning application. With regards to (e), it will be crucial that a planning application is supported with a robust Alternative Site Assessment (ASA). It is acknowledged that there are certain constraints with regards to the location of an ESS development, such as distance from a Point of Connection (POC). An appropriate search area is suggested as 2km from the POC. Available or potential derelict land should be included, including former industrial land etc.

With regards to demonstrating an unmet need for the type of development, NPS EN-1 covers the role of energy storage. The Framework sets out that the planning system should support the transition to a low carbon future and support, amongst other things, renewable and low carbon energy and associated infrastructure. Given the context provided by NPS EN-1 and the Framework, it is concluded that an ESS project more than likely represents much needed associated infrastructure. However, the applicant should ultimately demonstrate this as part of their submission.

In addition to this, it is acknowledged that one of the constraints to the early development of renewable and low carbon energy and associated infrastructure is the ability to access the local grid. It is understood that in some places, notwithstanding the appetite to develop projects, grid connections are not available for several years. Thus, given the imperative of mitigation climate change and achieving net zero, it is likely the project can make an early contribution to the clean power pathway required to achieve net zero. Whilst the LPA accepts it will be likely demonstrable that there is an unmet need for this kind of development, the onus is on the applicant, and they should provide quantifiable evidence of an unmet need for this type of development.

Turning to the requirement that the development be in a sustainable location. Whilst the application site is not within a Sustainable Development Location (SDL), access would be afforded with relative ease from North Cray Road. It is considered likely that the applicant will be able to demonstrate this requirement can be met.

The 'Golden Rules' do not apply to this development type.

Conclusion: There is the potential that the site could be argued as 'grey belt' against the definition provided within the NPPF. The applicant/their agents then really need to focus on the requirements of paragraph 155, specifically a). where it needs to be demonstrated that the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Alternative

sites would also need to be explored to meet e). If these matters cannot be addressed/demonstrated to officers' satisfaction, then we should revert to considering the site as inappropriate development and [consider] against VSCs.

Strategic Planning – Site Designation (agricultural land)

The prospective applicants should be aware that the NPPF states that where significant development of agricultural land is demonstrated to be necessary, areas of poor-quality land should be preferred to those of a higher quality. Any full application will need to address this point.

Strategic Planning – Mandatory Biodiversity Net Gain (BNG)

It has been noted that the pre-application statement indicates that a BNG assessment is to be carried out in connection with the proposals. Whilst the statement refers to relevant development plan policies, the applicant should consider the mandatory requirement under Schedule 7A of the Town and Country Planning Act 1990. The council expects all opportunities for on-site BNG to be maximised. Guidance on BNG is available at https://www.gov.uk/government/collections/biodiversity-net-gain.

Strategic Planning – Urban Greening

There is a requirement under both London Plan Policy G5 and Bexley Local Plan Policy DP21 for development to achieve a minimum level of greening. The application should be supported by an Urban Greening Factor (UGF) calculation. In line with urban greening best practice, it is expected that the greening measures address locally specific conditions of the site. Further guidance is available at https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/urban-greening-factor-ugf-guidance, and https://www.london.gov.uk/programmes-strategies/urban-greening-biodiversity-net-gain-design-guide.

Strategic Planning – Sustainability

Relevant London Plan policies relating to sustainability include SI 2, which discusses the need to minimise greenhouse gas emissions and SI 3, which relates to the storage of green energy. Local Plan Policy SP14 – mitigating and adapting to climate change, is the most relevant to the proposal. The submission does not make it clear whether the BESS will cater for green energy sources, but notwithstanding this it is acknowledged that the project may potentially have a role in helping in the transition to a greener energy and energy security. Current Local Plan policy focus is on encouraging green/renewable energy schemes, facilitating the decentralisation and decarbonisation of the energy network. The applicant should therefore ensure that these objectives are met and a strong justification for why there is a need for the proposed BESS to be

located within Bexley, and how this will be of benefit. Any application will need to be accompanied by an assessment of alternative sites.

The London Borough of Bexley supports developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to zero. The council is currently engaging with the GLA on the production of the East London Subregional Local Area Energy Plan (LAEP), which will help identify necessary energy infrastructure requirements as well as opportunities to decarbonise London's energy system. The East London LAEP is due for completion by Autumn 2025. Further information can be found at https://www.london.gov.uk/programmes-strategies/better-infrastructure/infrastructure-coordination/planning-service/local-area-energy-planning-london.

Contaminated Land

No objection in principle. However, given the location the applicant should be aware of the potential for 'swallow holes' that can 'crop up' in the area. It is recommended that structural and land stability investigations are carried out.

Environmental Health

It is noted the applicant intends to submit a Noise Impact Assessment ('NIA'). The 12-month construction phase of the development has the potential to cause some disturbance to local residents in terms of noise and dust emissions, which will need to be adequately mitigated and controlled through the imposition of planning conditions.

Operational air quality impacts are anticipated to be negligible, with those associated with construction phase able to be minimised through adoption of best practices. Maintenance visits whilst the site is operational are expected to be relatively infrequent and consequently not expected to result in adverse impacts.

It is recommended that the applicant carries out early consultation with London Fire Brigade, OFGEM (or other relevant regulators).

Environmental Health will make further comments on receipt of the NIA.

Transport and Development

The proposal site is located approximately 400m east of North Cray Road and is accessed from North Cray Road, which is an 'unmade public right of way' and the proposal would include improvements for construction vehicle access to the site.

Upon completion of the construction of the ESS, it is unlikely there would be regular traffic movements to and from the site and subsequently the proposals would have no adverse effect on the local highway network. Nonetheless, the applicant should provide a Construction Traffic Management Plan to monitor the effects of the proposals on the local highway network.

Placemaking

The Landscape Visual Impact Assessment (LVIA) note states that the visual receptor for 'Viewpoint 10' is road users to the A223. However, due to dense roadside trees and the natural landform on A223, the existing site is not visible to road users. It is recommended to relocate the viewpoint to North Cray Road.

With regards to the proposal's impact on the surrounding area, the information provided is currently minimal. The applicant should provide further design details that, given the site location, reflect a sensitive approach to design and consider the experience of residents and visitors to the area. The council will expect to see demonstration of this through, amongst other design considerations, the architectural expression and scale of structures and green sustainable principles integrated into the proposal.

Local Lead Flood Authority (LLFA)

The LLFA would have no objections to the planned development, provided that a full drainage strategy is included in any planning application. As indicated in submitted information, the land is currently undeveloped, and the proposed works are likely to increase the surface water runoff rate. The LLFA would expect the site to achieve the greenfield runoff rate for all return periods and not increase flood risk elsewhere. The inclusion of Sustainable Drainage elements at an early stage in the project development will allow such elements to be incorporated more easily and provide greater overall benefits. The applicant should follow the drainage hierarchy, as set out in Policy SI13 in the London Plan.

RESPONSE

Introduction

The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. Sustainable development has three interdependent overarching objectives – economic, social and environmental. Planning decisions play an active role in guiding development towards sustainable solutions, taking local circumstances into account to reflect the character, needs and opportunities of each area.

As set out under Section 4 of the NPPF, Local Planning Authorities are to approach decisions on proposed development in a positive and creative way. Early engagement, as demonstrated under this pre-application, is encouraged and enables better coordination between public and private resources to lead to improved outcomes for the community.

Principle of Development – Climate Emergency

As a starting point, it is advisable that the application is submitted referring to current global events and current legislation regarding the climate emergency and ongoing geo-political events impacting the United Kingdom's energy security. The submitted documents do not make any significant reference to this and supporting information should robustly and clearly set the background for the need for such infrastructure in light of these issues.

Principle of Development – Green Belt

The ESS is proposed on land designated as Green Belt. In assessing any planning application, the Local Planning Authority (LPA) must give substantial weight to harm to the Green Belt, including its openness, except for development on grey belt land, which is not inappropriate. Harm to the Green Belt can only be approved in Very Special Circumstances (VSCs), which exist only if the harm is clearly outweighed by other considerations (Paragraph 153, NPPF).

Paragraph 154 lists exceptions where development in the Green Belt is not inappropriate. The proposed ESS does not fall under any of these exceptions.

However, Paragraph 155 allows other forms of development to be considered not inappropriate in the Green Belt where all the following criteria are met:

- The development would utilise grey belt land and would not fundamentally undermine the overall purposes of the Green Belt.
- There is a demonstrable unmet need for the development.
- The development is in a sustainable location, as per Paragraphs 110 and 115 of the NPPF.
- Where applicable, the proposal meets the 'Golden Rules' (Paragraphs 156-157), though these apply only to housing development and are not relevant here.

The NPPF defines grey belt as previously developed land or land that does not strongly contribute to Green Belt purposes (a), (b), or (d) of Paragraph 143. The NPPG (updated February 2025) clarifies that:

- Villages are not considered large built-up areas, supporting the argument that land within or adjacent to them may not strongly contribute to purpose (a).
- The extent of contribution to Green Belt purposes should be assessed using a sliding scale, ranging from strong, moderate, to weak/no contribution.
- A site is only excluded from grey belt designation if other Footnote 7 policies provide a strong reason for refusal, aside from the Green Belt designation itself.

Given these parameters, an initial review by the LPA indicates that the application site may be capable of being classified as grey belt land. The applicant is advised to robustly justify this by addressing the tables provided in the updated NPPG.

Assuming the site is classified as grey belt, the applicant must satisfy the four criteria of Paragraph 155:

(a) Use of Grey Belt Land and Impact on Green Belt Purposes: The applicant must assess all Green Belt purposes, including those not covered in the grey belt assessment:

- (c) Safeguarding the countryside from encroachment – Demonstrate why the development does not constitute encroachment or why any encroachment does not undermine this purpose.

- (e) Supporting urban regeneration – Submit a robust Alternative Site Assessment (ASA) within a 2km radius of the Point of Connection (POC), identifying and justifying why no alternative, previously developed sites are viable or preferable.

(b) Demonstrable Unmet Need: The LPA acknowledges that the need for ESS development is likely to be demonstrable, but the applicant must formally evidence this.

(c) Sustainable Location: Paragraphs 110 and 115 require major developments to be in sustainable locations. The proposed ESS would generate negligible trips, and while the site is not well-served by public transport, this is unlikely to be a significant concern given the nature of the development.

(d) Golden Rules: Not applicable, as they only relate to housing.

If the site does not qualify as grey belt or is otherwise considered inappropriate development, the applicant must demonstrate Very Special Circumstances (VSCs). VSCs exist only where harm to the Green Belt, and any other harm, is clearly outweighed by other considerations (Paragraph 153, NPPF).

Paragraph 160 acknowledges that ESS may be considered a renewable energy project, and such projects within the Green Belt are often inappropriate. The applicant must justify VSCs, potentially including wider environmental benefits, such as increased renewable energy production, regardless of whether the renewable source is on- or off-site.

Even if a development is not inappropriate, this does not remove the land from the Green Belt or guarantee approval. Other policies, including the adopted local plan and the NPPF as a whole, will still apply.

The NPPG clarifies that if a development is deemed not inappropriate on grey belt land, then substantial weight is not given to harm to the Green Belt, including its openness. In this case, the proposal would not require justification through VSCs.

Finally, applicants should ensure compliance with London Plan policies GG2 (Making the best use of land) and G2 (London's Green Belt), demonstrating consistency with their requirements.

DISCLAIMER: With regards to the green and grey belt, these comments are provided based on an officer level assessment which has been informed by current government guidance and are made without prejudice to the outcome of a future Green Belt Review (which the Council will be undertaking).

Principle of Development – Minerals Safeguarding Area

A small part of the application site is on land designated for the safeguarding of minerals. From the submitted plans, it is highly unlikely the proposal would have any impact on this designation given that the area designated will only be used for access, utilising existing access tracks and roads. Nonetheless, it is advised that this is clarified in any submission.

Principle of Development – Alternative Site Selection

Given the proposed ESS's location relatively remote from the Hurst Grid Substation and siting on Green Belt land in the open countryside, a robust and clear alternate site selection strategy will need to be demonstrated. Justification for both the overall need for the ESS on a national and regional level, demonstration of alternative sites including in nearby boroughs (Bromley, Dartford) will need to be presented to demonstrate to the LPA that there are no viable alternatives that would result in less harm will need to be put forward. Consideration of likely local opposition in this regard is also recommended. It is acknowledged that, no matter where located, this type of development will be controversial. However, the onus is on the applicant to duly address understandable concerns given the site's location. It should also be demonstrated why the extent of the land is required, demonstrating that the site is as compact as reasonably possible and the co-location of facilities closer to the Hurst Grid Substation is not possible and what the reasons are.

Character and Appearance

Section 12 of the NPPF sets out national policy guidance in relation to achieving well-designed places. Planning decisions are expected to ensure developments function well over the lifetime of the development, whilst being visually attractive in terms of architecture, layout and landscaping whilst being sympathetic to local character and the landscape setting. The potential of sites should be optimised.

Paragraph 131 of the NPPF states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, with good design is a key aspect of sustainable development. As set out in Paragraph 135, planning decisions should ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but for over the lifetime of the development.
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- Optimise the potential the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.
- Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion or resilience.

Bexley Local Plan Policy SP5 sets out that development within the Borough must be of a high-quality design and contribute positively to local character. DP11 goes on to set out that development should consider the character, including landscape character, of the surrounding area.

It is acknowledged by the LPA that the type of development proposed would appear functional and utilitarian rather than designed to be 'beautiful'. Nonetheless, efforts should be made to ensure that appropriate landscaping, making use of appropriate species types, is provided to mitigate and, where appropriate, screen the proposed development from general view. It is observed that the BESS would be constructed upon flat land at a lower elevation than the surrounding area, which, depending on proposals for land levels, may result in a form of development particularly prominent from the surrounding area. Landscape screening should consist of appropriate types and species of plants that would relate to the surrounding landscape and complement, support or encourage the return of locally protected or threatened biodiversity. The applicant should also explore if elements of the proposed structure could be housed in low level, agrarian style buildings that would be less impactful than having the most unsightly and utilitarian elements of the proposal open and visible.

<u>Impact on Surrounding Land Use</u>

Paragraph 187(e) of the NPPF states that new development should not be impacted or cause impact to the local environment through unacceptable impacts through soil, air, water or noise pollution or land instability. Paragraph 198 goes on to set out that development should mitigate and reduce impacts from noise, which can result in significant adverse impact on the quality of life of nearby occupiers. Planning decisions will identify tranquil areas, with the impacts of light pollution on surrounding land uses and occupiers of surrounding buildings also identified, and mitigation required. Information should be submitted to demonstrate that the equipment will not cause any harmful glare that may affect surrounding properties or traffic.

London Plan Policy D13 explains the Agent of Change Principle. The onus on mitigation impacts from existing surrounding land uses or caused by proposed land uses is on the

proposed development. New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should mitigate such noise or other nuisances. Policy D14 goes on to set out that development proposals should avoid significant adverse noise impacts and mitigate/minimise noise impacts that may result from or to existing or proposed development.

Bexley Local Plan Policy DP11 sets out that it should be ensured that development does not result in undue impact upon neighbouring amenity through loss of privacy or outlook, daylight or impacts on any other forms of amenity, including noise, odour, vibration or light spill.

The applicant should ensure that any submission for planning permission is supported with robust assessments relating to noise outbreak and mitigation. It is likely that noise impacts could be appropriately mitigated (if mitigation is required) through landscaping, bunding and acoustic barriers. However, the applicant is reminded to consider the appearance of such mitigation. In addition to noise, consideration to light overspill will be required, both upon nearby dwellings and upon wildlife that may be impacted by lighting overspill. An external lighting assessment will be required.

Transport

Paragraph 109 sets out that transport issues should be considered early, with development proposals ensuring impacts on the transport network are addressed, including the provision of sustainable transport options, consideration of movement patterns and realising opportunities from existing transport networks.

London Plan Policy T2 sets out that development proposals should demonstrate support for the ten Healthy Streets indicators and ensure that developments are suitably permeable to local walking and cycling networks, whilst T5 supports the removal of barriers to cycling.

Bexley Local Plan Policy DP22 sets out, amongst other things, that developments proposals should facilitate and promote cycling and walking, whilst DP24 sets out that proposals should not have undue impact on road safety or unsuitable use of roads that would prejudice the road hierarchy.

Given the type of development proposed, it is not envisaged that trip generation would have any undue impact on the function of roads surrounding the application site nor generate any meaningful additional traffic. However, during construction phase, it is likely there will be some impact on the local road network. It is expected that any proposal is supported with a robust construction traffic management plan and/or construction environmental management plan (CTMP/CEMP). It will also be likely that that through imposition of a condition that, prior to commencement of the proposed scheme, the condition of the surrounding road network will be recorded, with the road network condition then reviewed post-completion of the development. Any damage or degradation of the road network attributable to the construction of the development would need to be repaired at the developer's expense.

It is also of note that there are footpaths and byways proximate to the development site. These footpaths must not be closed at any time during the construction of the scheme without consent. It is expected that walking and cycling infrastructure proximate to the site are retained or improved as part of the development, as required.

It is observed that the intention is to utilise an existing access point from North Cray Road, used to access Manor Farm. The applicant would be expected to explore whether this intersection, the road layout and highway safety has been appropriately considered.

Ecology, Biodiversity & Landscaping

In England, Biodiversity net gain (BNG) is mandatory from 12 February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environmental Act 2021). Developers must deliver a BNG of 10%. This means development will result in more or better-quality natural habitat than there was before development. It is not considered that the proposed development would meet any of the exceptions. However, if the applicant believes that the development would be exempt, this case will need to be put forward under a full planning application.

Section 15 of the NPPF sets out that planning decisions should contribute to and protect valued landscapes, recognising the intrinsic character of the countryside and the wider benefits of ecosystem services. It sets out that net gains for biodiversity should be secured. Development proposals, wherever possible, should improve local environmental conditions including water quality.

Paragraph 193 states that, where significant harm to biodiversity cannot be avoided through alternate site selection, mitigation or compensation, then planning permission should be refused. The loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless in wholly exceptional circumstances. Paragraph 195 states that the presumption in favour of sustainable development does not apply where there are significant effects on habitat sites.

London Plan policy G1 states that development proposals should incorporate elements of green infrastructure that integrate into London's wider green infrastructure network. G5 goes on to set out that major development proposals should contribute to the greening of London and include elements of greening such as landscaping, trees and green roofs/walls et al. G6 states that SINCs should be protected, with the mitigation hierarchy already addressed elsewhere in this response needing to be adhered to.

Bexley Local Plan Policy DP11(b) sets out that a high standard of landscape design is expected, with due regard to the character of the surrounding area. Policy SP9(h) states that it should be ensured that landscaping makes use of native plant species of native provenance. Policy DP20 goes on to set out that landscaping should contribute to the enhancement of biodiversity and appropriately mitigate impacts of the proposed

development. DP20(2) states that an ecological buffer zone must be provided to ensure designated sites of conservation are appropriately protected from proximate development.

The majority of the application site is currently fallow agricultural land. It is expected that the application is submitted with an appropriate and robust landscaping plan, which demonstrates appropriate landscaping as set out in relevant local and national policy. Of particular note will be proposed landscaping that will act as a buffer between the development and nearby sensitive receptors, such as residential uses. It is expected that a robust ecological impact assessment will be submitted that demonstrates an appropriate scheme with suitable species of planting to improve local biodiversity. Given the existing land use as fallow agricultural grassland, a 10% biodiversity net gain would be expected to be easily achievable, and the LPA will expect a far greater net gain to be achieved.

Waste (inc. Excavated Materials)

London Plan Policy SI 7 sets out that circular economy principles should apply to development proposals, in order to promote a circular economy and reduce waste. The re-use of materials is strongly encouraged. The policy sets out that excavated material should be reused at a 95% rate.

Bexley Local Plan DP27 states that all development proposals should consider how the re-use and recycling of construction, demolition and excavation waste materials can be maximised on-site or, if this is not possible, within London.

The application site is set across largely flat land, that will not be expected to require substantial re-grading or reprofiling to accommodate the proposed BESS. It is expected that any excavated material is reused on the site, potentially contributing to bunding or improved landscaping that will be appropriate when considering the landscape character of the surrounding area. Should there be excavated material surplus to requirements, a robust strategy for the re-use or appropriate off-site recycling of this waste must be demonstrated in submission of the planning application.

It is acknowledged that the development proposed will not be a significant waste generator.

Safety & Security (inc. Fire Safety)

Paragraph 102 of the NPPF sets out that planning decisions should promote safety and take into account security and defence requirements by adequately addressing possible malicious threats and natural hazards.

London Plan Policy D11 sets out that development proposals should maximise building resilience and minimise potential physical risks, including those from extreme weather events, fire, flood and related hazards. Development proposals should include measures that design out crime in proportion to risk. Policy D12 goes on to set out that

all development proposals must achieve the highest standards of fire safety, ensuring a variety of design features are considered and implemented into proposed schemes. The policy goes on to set out that all major development proposals should be submitted with a fire statement, setting out the requirements of the fire statement therein.

Bexley Local Plan DP11(h) states that all development proposals should follow the principles of designing out crime.

It is expected that any future planning application is submitted with the support of a robust fire and similar emergency strategy. It is likely a key concern of the proposed development is potential fire or explosive risks, whether or not this is the case. A robust and clear fire assessment and strategy encompassing the latest policy and technology relating to fire avoidance and suppression should be set out. Access to water or other relevant fire retardants to extinguish fires should be demonstrated. Consultation with the London Fire Brigade will be carried out.

The risk of trespass into the site should be addressed with appropriate boundary treatments forming part of the development proposals, as well as security lighting and CCTV systems.

Climate Change & Air Quality

Paragraph 161 of the NPPF states that the planning system should support the transition to net zero by 2050, taking full account of climate change. It should help to contribute to a radical reduction in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.

London Plan Policy SI 1 sets out that major development should be net zero-carbon. Major development must be accompanied by a detailed energy strategy to demonstrate that the net-zero carbon will be achieved.

Bexley Local Plan SP14 sets out that the Council will pursue the delivery of sustainable development, supporting developments that achieve net-zero and demonstrate commitment to reducing greenhouse gas emissions. Policy DP30 sets out that major development proposals must meet London Plan requirements in relation to whole-life carbon emissions.

As already addressed, and notwithstanding the green belt issues, the principle of providing a BESS is likely acceptable given the declared climate emergency and geopolitical events globally, with the benefits recognised of storing low carbon or renewable energy and addressing the climate emergency. However, notwithstanding this fact, direct impacts of the proposed development must be addressed. It is expected that the application site is net-zero in terms of carbon generation. Appropriate on-site power generation etc. should be demonstrated with an energy strategy submitted with a planning application.

Drainage & Flooding

A suitable SuDS (sustainable urban drainage systems) strategy must be employed to ensure that greenfield run-off rates are achieved and to counter the effect of increasing the surface water flood risk.

It is a requirement that the SuDS hierarchy is correctly followed and that surface water is dealt with on site at source as much as possible (As required by the Mayor's London Plan 2016, the Building Regulations, Bexley's SFRA, the SuDS Manual and "Sewers for Adoption").

The Council's Sustainable Drainage Design and Evaluation Guide provides further details of this and can be found on line, via the following link.

https://www.bexley.gov.uk/services/planning-and-building-control/planning-policy/supplementary-planning-documents-spds

In addition to this you should be mindful that:

- The development must not make the flooding worse either on or off site as per National Planning Policy Framework (NPPF) and where possible will reduce the flood risk overall.
- Exceedance routes for the 100 year design storm plus climate change, to be plotted and protected under planning (NPPF & Designing for exceedance in urban drainage (Ciria 635)).
- Surface Water discharge into a Foul Sewer is strictly not allowed and likewise Foul discharge into a Surface Water Sewer is strictly not allowed.
- The drainage designs must also comply with Building Regulations Part H and comply with Thames Water Authority adoptions and approvals.
- Thames Water Utilities Limited should be consulted regarding any new sewer connections, sewer capacities, new water supplies and new water meters.

It is of note that there is a pond located on the site of the proposed BESS. This pond would need to be considered, as it likely has some contribution to the natural drainage of the immediate area.

Contaminated Land

Paragraph 187(f) sets out that the remediation of contaminated or unstable land should be taken into account through decisions for planning permission. Adequate site investigation should be carried out prior to development. Furthermore, Bexley Local Plan Policy DP28 sets out that where development is proposed on contaminated land, a desktop study and site investigation will be required.

It is not expected that the application site features areas of contaminated land. Nonetheless, a planning application should be supported with a suitably scoped desktop assessment. A planning condition will be required setting out the procedures should contaminate land be identified during the construction process.

Greater London Authority (GLA) Referrable

It is likely that the application will be referrable to the GLA. Category 3D of The Town and Country Planning (Mayor of London) Order 2008 sets out that development on land allocated as Green Belt or Metropolitan Open Land that would involve the construction of a 'building' with a floorspace of more than 1,000 square meters should be referred. It is advised that advice is sought directly from the GLA prior to the submission of a full planning application.

Environmental Impact Assessment (EIA) Development

A screening opinion has been provided under application 25/00137/SCREEN confirming the development is not considered EIA development.

Agricultural Land Category

The applicant will need to demonstrate what agricultural land category the agricultural land the development is proposed to fall under. If the agricultural land is considered 'good' or better, then appropriate details and justification will be required. It is acknowledged that the proposal is for a temporary 40-year period, which should assist in informing such justification.

Planning Obligations and CIL

Bexley's Community Infrastructure Levy (CIL) came into force on 30th April 2015. CIL is a system of planning charges for the funding of infrastructure to help make new development sustainable. It has largely replaced the previous system of Section 106 planning obligations except for securing site mitigation measures and affordable housing provision.

Bexley's CIL charge for the proposed development ('all other uses') in this location would be £10 per square metre. Further details of Bexley's CIL can be found on the Council's website: https://www.bexley.gov.uk/services/planning-and-building-control/planning/community-infrastructure-levy-cil

In addition to the above, the proposal would be liable for the Mayoral CIL, which is charged at £25 per square metre (plus indexation) of net additional floorspace.

CIL is payable on commencement of development.

Gas Assets

It is noted from submitted plans and documents that it appears there is an underground gas main within the application site. Due consultation will be required with the relevant bodies to address this prior to the submission of an application.

Pre-commencement conditions

Regulations require pre-commencement conditions to be agreed with the applicant/agent. If that agreement is not forthcoming it may result in the planning permission being refused. As part of a planning application, the Planning Authority will write to requesting agreement to such conditions. It is in your/your client's interests to respond promptly to that request, and it is good practice if pre-commencement conditions can be agreed as early as possible.

List of Documentation to be submitted with application

The link below takes you to a document which details the requirements for the valid submission of different types of planning applications to the London Borough of Bexley.

https://www.bexley.gov.uk/services/planning-and-building-control/planning/make-planning-application

The key documents to be submitted will include the following. This is not necessarily an exhaustive list; please refer to national and local validation requirements as per the above link.

- Completed Application Form
- Signed Ownership and Agricultural Holdings Certificate
- Application fee
- Location plan
- Site / block plan
- Sections and site levels
- Elevations of structures
- Boundary Treatment details
- Planning Statement
- Design and Access Statement
- Justification relating to 'Grey Belt' Assessment
- Noise Assessment
- Health Impact Assessment
- Construction Environmental Management Plan
- Alternative Site Selection Assessment
- Agricultural Land Quality Statement
- Drainage and SUDS Information
- Desktop Contamination Assessment
- Draft Planning Obligations List (if applicable)
- Sustainable Design, Construction and Renewable Energy Statement
- Landscaping Plan(s) and Planting Schedules
- Ecological Impact Report
- Fire Assessment and Strategy
- Urban Greening Factor Information
- Biodiversity Net Gain Information

- Energy Strategy

CONCLUSION

The principle of the erection of a Battery Electric Storage System (BESS) is considered acceptable for the purposes of addressing the ongoing climate emergency, however the land designation of the site as green belt is problematic. There may be demonstrable very special circumstances (VSCs) and/or potential justification for development in this location relating to 'grey belt' for erecting the facility on Green Belt designated land. However, these must be robustly presented in the submission of a full planning application.

Should the development be found to be acceptable on Green Belt designated land, it is expected that any planning permission would be for a lengthy albeit temporary period of 40 years.

It is expected that robust landscaping and mitigation is included with any planning application, with high quality landscaping appropriate for the character of the local area included. Landscape and ecology professionals should be consulted with early in the process, with a biodiversity net gain of 10% expected as an absolute minimum. It is considered that, given the nature of the application site, a far greater % increase is achievable, and this will be pursued by the LPA.

The proposed access point from North Cray Road to the north of the development site, whilst acceptable, should be considered more carefully with regards to any improvements that may be required, particularly to allow access by construction vehicles.

The applicant should carefully review this document, which addresses a number of other considerations that will be addressed and considered in a full planning application.

Yours sincerely,

Principal Planning Officer
Planning Department – Development Management
Place

APPENDIX 2: EIA SCREENING DIRECTION

Development Management
Planning Department
Regeneration & Growth
Civic Offices, 2 Watling Street,
Bexleyheath, Kent, DA6 7AT
Telephone 020 8303 7777

The person dealing with this matter is: James Hughes
Email:

Our Application Reference Number: 25/00137/SCREEN

Date: 19 February 2025

Ollie Williams
Net Zero Thirty-Two Limited
C/O DWD
69 Carter Lane
London
EC4V 5EQ

BY EMAIL:

Dear Ollie Williams,

Re: Request for a Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for a 'Proposed 200mw energy storage system (ESS) and associated infrastructure.' at 'Land at North Cray Road, Sidcup, DA14 5AW'

This report responds to the request submitted on 23 January 2025, under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations"). Advice on when an EIA is likely to be required is provided by the National Planning Practice Guidance (PPG).

- Cover Letter prepared by DWD dated 23 January 2025 (Reference 17901)
- Appendix 1 – Location Plan
- Appendix 2 – Magic Map
- Appendix 3 – Local Plan Policies Map
- Appendix 4 – Flood Risk
- Appendix 5 – Public Right of Way Map
- Appendix 6 – Sensitive Areas
- Appendix 7 – Standard Drawing: ESS Unit
- Appendix 8 – Standard Drawing: PCSK Inverter
- Appendix 9 – Manor Farm Sidcup ESS: Proposed Site Layout Plan

Introduction

The site, located in open countryside approximately 325 metres to the east of the A223 ('North Cray Road'), is proposed for the development of a 200MW Energy Storage System (ESS), along with associated infrastructure. The location plan shows land will also be required along the southbound carriageway of A223, a stretch of A2018 ('Vicarage Road') and Stable Lane to connect to the Hurst Grid Substation, located approximately 1.9km to the northeast. The site location plan indicates the 200MW ESS would occupy an area of approximately 6.9 hectares. The applicant has requested that the London Borough of Bexley determine whether the scheme constitutes 'EIA development' under the EIA regulations.

Review of Screening Criteria

I can confirm that the Planning Authority is of the view that the proposed development would fall under 'Schedule 2, Part 3(a) 'Industrial installations for the production of electricity, steam and hot water'.

The site is not within a 'sensitive area' and the thresholds have been applied.

The applicable thresholds and criteria for this type of development as outlined in Schedule 2 is:

- The area of the development exceeds 0.5 hectares.

The applicable thresholds are met.

The proposed scheme is screened on the basis of a 'Schedule 2 development' for the purpose of the EIA regulations to determine whether the proposed development is likely to have significant effects on the environment, and hence whether an Environmental Assessment is required. The EIA regulations and National Planning Practice Guidance (NPPG) requires the Planning Authority to take into account the selection criteria as set out in Schedule 3 of the EIA regulations when deciding whether a Schedule 2 development is an EIA development.

These include:-

1. Characteristics of development

2. Location of development

3. Characteristics of the potential impact.

To aid the Planning Authority in the determination as to whether the proposal is likely to have significant environmental effects, the Planning Authority has also had regard to indicative thresholds and criteria as set out in the EIA regulations and NPPG and has used a matrix for this purpose (attached as an appendix). This screening opinion should be read in conjunction with the appended screening matrix.

1. **Characteristics of development**

(a) The size of development:- The site (including cable run) is approximately 11.5 hectares.

(b) Cumulation with other development: - it is not considered that there are other significant developments within proximity that would create a cumulative effect.

(c) Use of natural resources: - Construction is akin to normal building/highway construction and will involve the use of land, soil, water, materials/minerals and energy. There are likely to be non-renewable material/minerals used.

(d) Production of waste: - the development would not produce any significant waste.

(e) Pollution and nuisances: – Noise, vibration and dust expected from the construction activities; however, it is not considered to be significant or long term. Mitigation of any noise, dust, vibration can be achieved. Noise and vibration may continue once the site is operational, but mitigation of any noise and vibration can be achieved.

(f) Risk of major accidents and or disasters, including those caused by climate change:

The development would involve the standard risks associated with any such build out and operation.

For the operational process there is a risk of battery fires.

There are specific guidelines by the National Fire Chiefs Council [NFCC] regarding Battery Energy Storage Systems [BESS], linked to Section 7 of the Fire and Rescue Services Act 2004. There will be a requirement to provide details of the design, firefighting access and facilities at the site, and a Site Specific Risk Information (SSRI) in the form of an effective Emergency Response Plan.

An outline Battery Safety Management Plan (oBSMP) (or similar) and Battery Safety Management Plan (BSMP) should be submitted with the planning application.

The London Fire Brigade would be notified/consulted on any planning application.

With the above regimes and procedures imposed, adopted, implemented and adhered to, the risk of accidents should be sufficiently mitigated and be low.

There is no evidence that the proposal would have any significant adverse impacts upon climate change.

(g) Risk to human health:

For the operational process there is a risk of battery fires, which may create a fire and air pollution incident.

As above, there are specific guidelines by the National Fire Chiefs Council [NFCC] regarding Battery Energy Storage Systems [BESS], linked to Section 7 of the Fire and Rescue Services Act 2004. There will be a requirement to provide details of the design, firefighting access and facilities at the site, and a Site Specific Risk Information (SSRI) in the form of an effective Emergency Response Plan.

An outline Battery Safety Management Plan (oBSMP) (or similar) and Battery Safety Management Plan (BSMP)will be submitted with the planning application.

The London Fire Brigade would be notified/consulted on any planning application.

With the above regimes and procedures imposed, adopted, implemented and adhered to, it is considered that there are not likely to be any significant effects to human health.

2. **Location of Development**

(a)Existing Land Use: – Agricultural.

The potential for impact in terms of the location of the development, on agricultural land, is not significant. Mitigation can be incorporated in the development to minimise any impacts on surrounding land uses. The potential for impact is unlikely to be significant.

(b)Relative abundance, quality, regenerative capacity of natural resources: - The potential for impact is considered limited.

(c) Absorption capacity of the natural environment: - The proposal is not within any sensitive location and the impacts on natural resources are limited. The proposal is not within or adjacent to any national environmental designation.

Likelihood of significant effects is not anticipated.

3. **Types and Characteristics of the Potential Impact**

(a) Magnitude & Extent of impact: - The magnitude and extent of the proposal on human health, population, biodiversity, land, soil, water, air, climate, material assets, cultural heritage and the landscape are unlikely to be significant with appropriate mitigation measures (including those noted above in 1(f)) are unlikely to give rise to any significant environmental effects.

(b) Nature of Impact : - The construction process will likely produce, dust/air pollution and noise. With appropriate mitigation measures they are unlikely to give rise to any significant environmental effects. Noise and vibration may continue to be an issue once the site is operational, but mitigation of any noise and vibration can be achieved.

The impacts on groundwater are not considered to be significant.

(c) Transboundary nature of impact: - It is not considered any operational impacts are likely to carry significantly beyond the proposal site.

(d) Intensity and complexity of impact: - The magnitude and complexity of any impacts are not considered to be substantial.

(e) Probability of Impact: – Most of the operational impacts are likely to be relatively localised.

(f) Expected onset, duration, frequency and reversibility of the impact: - The majority of the impacts on human health, population, biodiversity, land, soil, water, air, climate, material assets, cultural heritage and the landscape are temporary and of duration of the construction period. The majority of impacts associated with the construction can be mitigated and are not considered permanent.

On completion of the construction works there are likely to be operational impacts, but with the noted mitigation it is unlikely to give rise to any significant effects.

(g) Cumulation with other existing/approved development: - The proposal is unlikely to give rise to any significant additional impacts to the area, in isolation or cumulatively.

(h) Possibility of reducing the impact: - The majority of potential impacts are primarily localised and as such can be readily mitigated.

Conclusion

Having completed the screening exercise, for the reasons given above and in the attached matrix, the Local Planning Authority considers that the proposed development is unlikely to have significant effects on the environment and under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 it is not EIA development.

Decision:

EIA not required.

Yours sincerely,

Mr M Norwell
Director of Place

APPENDIX 3: CONSULTATION LETTER

Date: 23 January 2025
Our Ref: 17947

69 Carter Lane
London
EC4V 5EQ

Dear Sir or Madam,

PROPOSED ENERGY STORAGE SYSTEM – LAND AT NORTH CRAY ROAD, SIDCUP

We are writing to you, as a nearby neighbour, to advise that Net Zero Thirty Two Limited is proposing to develop an energy storage system ('ESS') on land at North Cray Road, Sidcup. The project or 'Proposed Development' is currently known as the North Cray Road ESS Project. The proposed location of the Site is shown outlined in red in the plan attached to this letter.

DWD Property and Planning Limited and Firstway Energy are coordinating the preparation and submission of the planning application on behalf of Net Zero Thirty Two Limited. Firstway Energy is a UK based energy storage developer with a portfolio of sites across England and Wales. Firstway's ethos is to provide utility scale energy storage systems to support the UK's transition to Net Zero while ensuring that any system provides significant benefits to the local environment.

It is anticipated that the ESS would have a total import/export capacity of 200 Megawatts ('MW'), capable of powering approximately 647,590 homes. The Proposed Development would have an operational lifespan of 40 years, following which the Site would 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. This service is an important component of balancing the supply and demand on the infrastructure that serves the population and vital to a sustainable and viable network across the country as a whole.

The Proposed Development would reduce fluctuations, improve stability and reduce the risk of power failures and should be regarded as essential to enable the transition to low carbon energy. 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 and a net zero electricity grid by 2035.

As a resident and member of the community, we would like to hear your thoughts on our proposals to inform the project prior to the submission of a formal planning application to the London Borough of Bexley. We would therefore encourage you to get in contact, ask questions and provide us with your valuable feedback.

It is also Net Zero Thirty Two Limited's intention to submit an Environmental Impact Assessment ('EIA') Screening Request to Bexley Council in January 2025.

Please have a look at our Project Website for more information on the Project:

- www.netzerothirtytwo.com

Our formal consultation period will close on 21 February 2025. We will endeavour to consider comments up until submission of the formal application, but in order to properly consider any feedback you may have before we submit, we request that any comments be submitted as soon as feasible. Feedback can be submitted via the contact details below or via the website:

-

In parallel with the North Cray Storage Project, Firstway Energy (under Net Zero Thirty Three Limited) are also undertaking a similar pre-application consultation exercise and EIA Screening Request associated with a proposed 212MW energy storage scheme located approximately 2.5km to the north near Bexley, known as the Dartford Road ESS Project.

We look forward to hearing your comments and answering any questions that you might have.

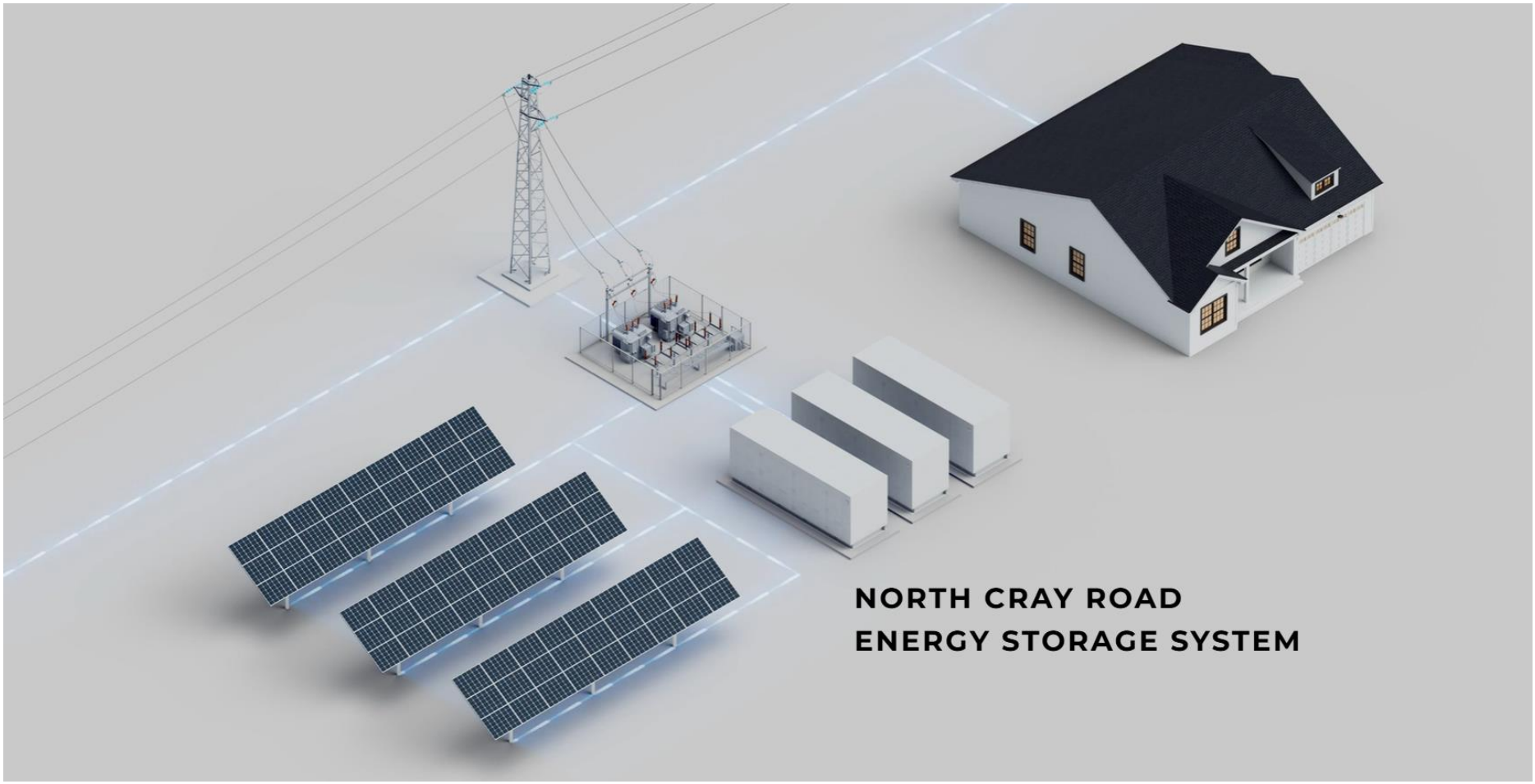
Yours faithfully,

DWD Planning and Property Limited

Enclosed:

Site Location Plan

APPENDIX 4: PROJECT WEBSITE


NORTH CRAY ROAD
ENERGY STORAGE SYSTEM

INTRODUCTION

In association with Firstway Energy, Net Zero Thirty Two has plans to develop a utility scale energy storage system on land at North Cray Road, Sidcup.

Energy storage systems provide reliable and clean energy for households, businesses and communities - enabling the UK transition to net zero, and providing vital energy security.

ENERGY STORAGE SYSTEMS

- Energy storage systems effectively store power from the grid at times of excess supply and feed that power back to the grid at times of high demand.
- They provide a flexible back up power source to the National Grid energy infrastructure, playing a key role in the phasing out of fossil fuels to electric turbines and facilitating the uptake of renewable energy.
- Energy storage provides a vitally important role in the fight against climate change and the UK's energy security and will assist in helping the country become more self-sufficient.
- Renewable Energy such as solar and wind farms produce intermittent energy ie. when energy is produced on warm and windy days and there is limited demand for this energy, it is often lost, wasted and not used. Energy storage provides a solution to this lost energy and will capture and store this clean energy helping to balance energy generation against energy demand.

GOVERNMENT SUPPORT

There is a significant and quantifiable need for the deployment of renewable energy generation and battery storage in the UK, which is being driven by UK Government legislation and policy.

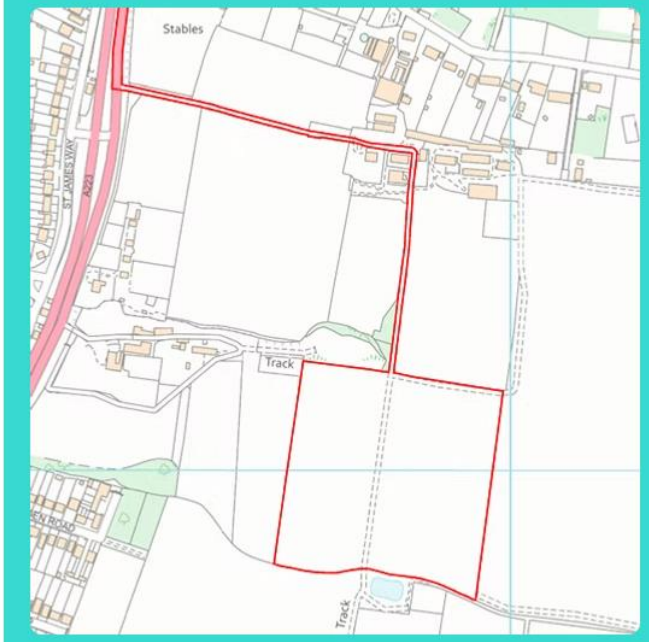
In 2019, the Government raised the UK's commitment in tackling climate change by legislating a net-zero target by 2050.

To achieve this target, the UK Government committed to decarbonising the electricity system by 2035, i.e. an electricity system that is powered solely by nuclear, low carbon and renewable energy. Decarbonising the power sector is integral to achieving this target and requires major investment in proven low carbon and renewable and energy storage technologies.

In addition to the net zero targets and commitments above, the Government has issued a plan to make Great Britain energy independent. To achieve this, the Government has set a target to double Britain's electricity generation by 2030.

To transition to a net-zero electricity system and to achieve energy security, utility-scale energy storage systems will be required to store energy and balance electricity supply to the grid to meet existing and future energy needs.

AERIAL OF SITE



PROPOSED DEVELOPMENT

The proposed energy storage system is located on land at North Cray Road, Sidcup.

The site has been carefully chosen and designed following an extensive assessment of potential sites within a suitable proximity to Hurst Grid Substation, and will be connected to the substation via underground cables.

The total site size, including cable route, comprises approximately 7.54 hectares of land (with the fenced off ESS compound itself occupying approximately 2.1 hectares) and it is anticipated that the energy storage system will have a total import/export capacity of 200 megawatts, which is enough to power 647,590 homes.

The proposed development would have an operational lifespan of approximately 40 years, before the site is restored back to its former state (i.e. agricultural use).

SCHEME BENEFITS

- Addressing the negative impacts of climate change;
- Provision of more renewable energy;
- Farm Diversification;
- More green energy supply reducing the cost of energy to households – large numbers of people in the UK;
- Better air quality through lower emissions;
- Energy security and being self sufficient as a nation;
- 10%+ Biodiversity Net Gain;
- Reducing flood risk through additional tree planting;
- Accepted and commercially viable connection offer;
- Temporary scheme with full reinstatement and decommissioning to existing use in 40 years time.

INDICATIVE LAYOUT


EXAMPLE ENERGY
STORAGE SYSTEM

NORTH CRAY ROAD IN NUMBERS

200MW

ENERGY STORAGE CAPACITY

647,590

HOMES POWERED

7.54HA

APPROXIMATE SITE SIZE

10%+

BIODIVERSITY NET GAIN

ENVIRONMENTAL BENEFITS

New vegetation planting: new hedgerows and species rich grassland will be planted to supplement the existing vegetation, and to screen the development from the surrounding area.

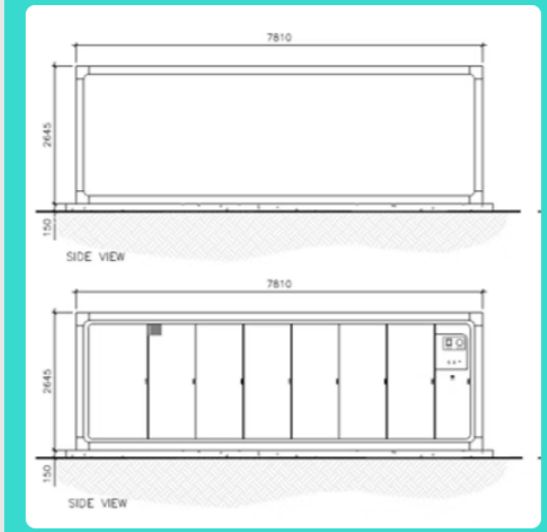
Biodiversity Net Gain: the proposed development will deliver a biodiversity net gain, in excess of planning policy requirements, through the planting of hedgerows and native vegetation which will create new habitats to the benefit of local wildlife. The percentage increase in biodiversity net gain will be confirmed as part of the planning application.

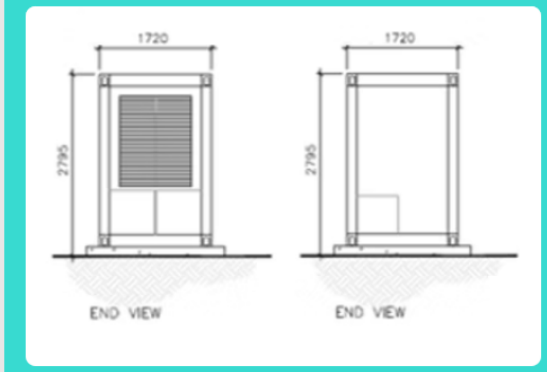
Reducing carbon emissions: energy storage systems are crucial to effectively integrating renewable energy generation in to the grid, which reduces reliance on dirty energy sources and leads to a significant reduction in greenhouse gas emissions.

Increasing energy efficiency: energy storage systems facilitate the storage of renewable energy when there is excess supply, and feeds the energy back into the grid when there is excess demand. This helps balance the supply of electricity to the grid - improving energy management, reducing the wastage of electricity and conserving natural resource.

PROJECT TIMELINE

ENERGY STORAGE SYSTEM UNITS





CONSTRUCTION AND OPERATION

The construction of energy storage systems is a relatively straight forward process. The energy storage units do not need deep foundations - they sit on thin concrete plinths and are connected to the local substation, which is approximately 1.45m to the north-east of the site, via an underground cable.

All construction and operational vehicles will access the site via an existing farm access track off North Cray Road.

Traffic associated with the Proposed Development will be largely limited to the temporary construction phase, during which management measures will be put in place through a Construction Traffic Management Plan.

Traffic during operation will be limited to general maintenance, with maintenance teams needing to access the site typically twice a month.

The construction period of the proposed development is 18 months, and the indicative grid connection date is January 2028.

PLANNING APPLICATION

The Planning Application submitted to London Borough of Bexley Council will include the following documents:

- Completed application form.
- Planning, Design and Access Statement.
- Landscape and Visual Impact Assessment.
- Very Special Circumstances Report.
- Construction Traffic Management Plan.
- Flood Risk Assessment and Drainage Strategy.
- Heritage Desk-Based Assessment.
- Noise Assessment.
- Arboricultural Impact Assessment.
- Ecological Assessment.
- Biodiversity Net Gain Assessment.
- Outline Battery Safety Management Plan.
- Suite of Drawings, including existing site plans, proposed site plans, landscaping plan and plans and elevations of the infrastructure associated with the proposed development.

NET ZERO THIRTY TWO

Phone

Email