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**BEXLEY NATURAL ENVIRONMENT FORUM RESPONSE TO 15/02926/OUTM02.** Details of reserved matters being details of layout, design, scale, appearance, hard and soft landscaping including boundary fencing details and pursuant to conditions 5, 6, 7, 8, 10, 11, 14, 15, 17, 24, 25 and 27 for the construction of two, four storey Data Centre Buildings (Use Class B8) sub-stations, formation of new access, car parking and associated works pursuant to planning permission 15/02926/OUTM. Land Part Of Borax Works Norman Road Belvedere Kent

## ENERGY STATEMENT

We find this deficient in important respects. Theresa May's government announced a net zero carbon target date of 2050. We understand that the Boris Johnson administration will abide by this. A number of more enlightened Local Authorities than Bexley have recently been passing motions setting a target date of 2030, some just for Council operations, but others for their whole areas. What is important is no longer simply the energy consumption / carbon dioxide emissions of such facilities when set against existing ones, but whether such schemes are compatible with that target at all and, given that we should consider that carbon rationing may be required for equitable achievement of that target, what the cost to other people's carbon ration of allowing them would be and whether this is acceptable or not.

The regulations upon which the applicant justifies the proposed energy usage as acceptable pre-date the 2050 target and will need to be considerably tightened.

We note that the consumption-based UK carbon footprint (i.e. taking onto account off-shored/imported emissions) per head of population has been calculated by Scientists for Global Responsibility as 15.5tonnes in 2014. ([www.sgr.org.uk/resources/how-big-average-briton-s-carbon-footprint-really](http://www.sgr.org.uk/resources/how-big-average-briton-s-carbon-footprint-really))

According to the Executive Summary 'The calculated energy consumption for the London Belvedere Data Centre, when operating at notional full capacity is 141,678MWh per year equating to 73,531tCO<sub>2</sub>.' It is unlikely to have fallen dramatically since. So to 'offset' this proposed addition to the emissions created within Bexley's boundary would require the equivalent of 4,744 Bexley residents having to reduce their emissions to / have a carbon ration of zero.

The proponent of this argues that the data centre will produce a net saving of energy / emissions by replacing other means of data/document production, storage and distribution, but has produced no data to support this contention, saying itself (p6) that '*Unfortunately very little work has been carried out to date within the industry to quantify this saving, to enable it to be offset against energy consumption*'. This is at the very least irresponsible, perhaps even reckless, given the climate emergency. The vulnerabilities of centralised digital data storage are not addressed.

Most of the document would appear to be about why the data centre cannot use renewable energy. Using energy from the incinerators might possibly be the least worst option if these schemes get the go-ahead, but this does not make the whole second incinerator / data centre package acceptable.

The statement (p4, 3.1) says that '*Energy costs are the single biggest expense for any data centre operator and therefore considerable attention is paid to make the data centre as energy efficient as possible. Environmentally the power for the data centre is generated from burning waste in the adjacent waste energy plant so also avoiding transmission losses usually associated with bulk power supplies.*' but as we pointed out in our objection to the initial data centre application, there is nothing environmentally friendly about a 20<sup>th</sup> century incineration model of waste disposal, and any energy produced from it comes from a linear and a not circular process.

Indeed, Bexley Council's condition 14 of the outline planning permission 15/02926/OUTM, date of decision 11/7/19, states that '*The Post Construction review for the BREEAM should confirm that the chosen renewable energy technology has been installed and that the development achieves 'Very Good'. The renewable energy technology/s installed must remain for as long as the development is in existence.*'

But the energy statement appears to rule out use of renewable energy and generation of any on the data centre site/buildings themselves. It says that there will be only a 0.01% energy saving due to renewable technologies, but it is not clear where this comes from. The new Design and Access statement makes no reference to the incorporation of any such technology. The condition 'installed' surely applies to this development application on a stand-alone basis, and not to other constructions, even if proposed by the same owner and nearby, so importing energy from the incinerator does not fulfil the condition, and in any case that energy is not from a renewable source. It would be absurd if the condition allowed the 'chosen renewable energy technology' to be a choice of no such technology. On that basis the applicant has not satisfied the condition.

## SIZE AND DESIGN.

The building size and design is completely out-of-keeping with the flat, big-skies local environment.

Design and Access 2.2 says Cory has:

*\* The ambition of providing exemplar Industrial architecture that is 'qualitatively higher than the standard industrial buildings in the surrounding area', and which reinforces the brand of the Operator.*

*\* Achieving a building mass and form that is appropriate to the context and that sits comfortably with its neighbours.*

The verbiage in D+A 2.7, including '*The context creates an opportunity to celebrate the scale of the buildings, where they can be placed as carefully crafted objects, where silhouette and skyline profile are as important as any other aspect of the architecture. This approach is a response to the scale of the adjacent (RRRF) and Crossness Waste Water Treatment Facility, **and to the open and remote character of the site.***' (bold is our emphasis) is utter self-contradictory twaddle.

Cory seems to have fallen for its own propaganda and the idea that some futuristic-looking construction is necessarily a positive addition to the landscape. It can be argued that another pair of bog-standard grey sheds would blend in much better with the existing 'industrial architecture' than the carbuncles Cory is now proposing.

The artist's illustrations of the finished buildings in the landscape (D+A document) are so inaccurate as to either be incompetent or deliberately misleading. They are fake views. The existing incinerator chimney is both missing in one and heavily truncated in another, Great Breach dyke is not there. There are scatterings of trees which do not exist in reality. The

buildings are being made to look like they are sitting on the edge of a manicured 'country park' not on grazing marsh and one of the most important wildlife sites in London.

These buildings will take up so much of each Borax field, the southern one approaching the bend in Great Breach Dyke, that they will make the Bexley Council-designated Local Nature Reserve look much smaller than it is, particularly when approaching from the south, and by sitting either side of the main Nature Reserve entranceway will create an unpleasant and unnatural canyon effect that will certainly put me off using it.

## **LANDSCAPING, PLANTING, 'GREEN INFRASTRUCTURE', BIODIVERSITY AND 'MITIGATION'.**

### **Landscaping vz biodiversity:**

Condition 21 which covers the biodiversity management plan said that 'This Plan shall be designed in conjunction with the landscape management plan, to ensure that the provision of each does not contradict each other'. That is another fail because the landscape plan contains a number of features which do nothing to deliver biodiversity benefits and gain and are more to do with a corporate 'tidiness' fixation. And Cory has failed to submit a Biodiversity Management Plan within three years of the outline approval, so appears to be in breach of condition 1. We have written to case officer Neil Luxton about this.

Fencing, which is covered in the landscaping section of the D+A document needs to be properly permeable to wildlife, including Hedgehogs, which may well be present in the area as I personally found a dead one on nearby Hailey Rd. a few years ago. If the weld mesh fencing illustrated in the D+A is taken down to ground level as-is, this clearly won't be the case.

It needs to be clear from where the 5m buffer is going to be measured. We suggest that it should be at least 5m from the distance a Water Vole burrow might be expected to run 'landward' into any ditch-side bunding so that no machinery or undue trampling would collapse a burrow. For practical purposes it should be from the bottom of the 'landward' side of any such bund.

Log piles would benefit any reptiles utilising what little is left of the site at ground level, and Reed/Reedmace piles should be created (and renewed in the winter as they will rot) for Grass Snake egg-laying. It may be that an arrangement could be made with Crossness LNR to provide surplus such material.

### **Planting:**

A number of the plant species proposed are both non-native and of little or no value to native wildlife, such as Liriope muscari, low-growing Euonymus and the shrubby Lonicera, particularly from the nectar provision point of view. Hart's-tongue Fern, whilst native, is not a plant of grazing marsh or open mosaic habitats. Once you cut through the corporate-speak it is clear that this selection of species does not meet Cory's claim/stated objective of '*The landscape proposals have been developed through an iterative process with the design and client team and aim to create an appropriate landscape setting to integrate the new development into the surrounding landscape.*' especially since most people are going to view it from Norman Road looking towards the Nature Reserve and not vice-versa. It is also effectively at odds with the D+A claim that Cory seeks to '*Minimise the construction and building footprint to maximise the retention and enhancement of the existing species rich grassland habitat ensuring the ecologist's recommendations are followed.*' We contend that the 'construction and building footprint' includes any deliberately created artificial man-made planting areas.

In our opinion there is no need whatsoever for planting of this sort, this is not a retail operation 'requiring' some sort of 'prettification' for customers, and open ground should instead be left to colonise by the Open Mosaic vegetation already present on the site, given that it has been

found to be of London level of importance for invertebrates precisely due to this habitat type. It follows that we would support the dropping of condition 20.1 as written since sowing 'meadow mixes' is not wholly compatible with allowing local colonisation and may not leave important bare ground patches for key invertebrates.

If 'supplementary' planting to match the existing open mosaic flora is thought to be advantageous then it should take into account the presence of rare species such as the Shril Carder Bee which has been found at Crossness and probably uses the Borax fields. Various leguminous and nettle family plants such as Bird's-foot trefoil and Black Horehound would be examples, and they should come from local seed sources – ideally off Crossness LNR itself or the existing Borax fields flora. It is likely they are already on the fields. From memory I'm sure some are.

Tree planting is not appropriate to the retention of a grazing marsh or open mosaic habitat or the general appearance of the same. It will do next to nothing to address the hugely negative visual impact of this scheme which, whatever Cory may claim, can simply not be 'mitigated' away.

### **Green roofing.**

Small sedum roofs on the gatehouse and cycle sheds do not 'mitigate' the losses of a large area of open mosaic habitat of London level important for invertebrates, nor of nesting habitat for red-listed Skylark that breed on the fields. Skylark is stated to be an 'important' species in Bexley in the Council's recent 'Preferred policies' document which will form the basis of the new Local Plan. Is this another fake Bexley biodiversity policy, or does the Council mean it for a change? It will not provide small mammal habitat to feed the Barn Owls that nest on the LNR. Cory laughably claims (D+A) that '*A high level strategy has been developed in consultation with the project ecologist to indicate provision on site for bird, bat and owl boxes.*' High level strategy'. Really? What does a 'Low level strategy look like? Nest boxes would only be an adequate substitute for the loss of a large area of foraging habitat IF nesting sites and not food were the limiting factor on the local population. The pattern of Barn Owl nest box usage on the LNR would suggest that this is not the case.

In our view, even if left alone and not weeded, Sedum roofs will not evolve into nesting habitat for Shril Carder Bees as we suspect that there will be insufficient substrate to support tussocky grasses.

From '*Rare invertebrates colonizing green roofs in London*', *Urban Habitats* 4(1):66-86 · January 2006 ....

*Sedum EGRs (extensive green roofs) can provide habitat for biodiversity, even if not intentionally designed to fulfil nature conservation objectives (Coffman and Waite 2011). However, from an ecological perspective, homogenous Sedum EGRs provide a restricted range of benefits for biodiversity because they often comprise plants from a single genus (Sedum), offer limited structural diversity and have short-lived flowers (Kadas 2006; Gedge et al. 2012; Rumble and Gange 2013; MacIvor, Ruttan, and Salehi 2015). Furthermore, Sedum dominated systems do not reflect the character or distinctiveness of regional plant communities, as most species would not be native to the regions where they have been installed.*

The Sedum roof proposal is greenwash and not a serious attempt to tackle the direct negative biodiversity impacts of this development.

## **Green walls.**

Another Cory fail. The vegetation will cover only a small part of the height of the buildings and the vegetation will not appear to get much higher than the fencing from most viewpoints, thereby negating any coverage effect. Only the Ivy is evergreen. A wild clone should be planted, not a selected cultivar, and certainly not a variegated one. Consequently, the walls will only be (minimally) disguised by a decent covering of leaves for maybe 2/3rds of the year. Hydrangea petiolaris is not native. It is not clear why this has been listed other than through more incompetence. It is deciduous. As are native alternatives such as White Bryony and native Honeysuckle (which occur on the LNR). The bottom line is that the huge visual intrusion cannot be eliminated.

We previously proposed a sloping crib wall with planting pockets for drought-tolerant natives to colonise. This would be far better for native biodiversity and not require an irrigation system.

## **Biodiversity loss not gain.**

We contend that there will be a net loss of biodiversity resulting from this development, which will be in contravention of the NPPF and the current Bexley Council 'Core Strategy'. No substantiating, data-led evidence has been presented by the applicant to prove the contrary. It is irrational to claim that the destruction of a large area of open mosaic habitat, a habitat of importance in the London Plan, and shown to be of at least London level importance for invertebrates, and that is also one of three (perhaps four) known nesting sites for Skylark in the Borough (which in any case only breeds in Bexley as a whole in small numbers) will not reduce biodiversity of conservation importance or, even more absurdly, will increase it, when there is essentially no mitigation for these losses. Therefore, the application fails to meet condition 20. *7. evidence of Assessment by an ecologist - in the form of a detailed report which demonstrates that there would be no potential impacts on biodiversity.* Moreover the Preferred Policies document makes it clear that Bexley Council is about protecting and enhancing biodiversity within the Borough boundary. 'Off-setting' it outside of Bexley does not achieve the policy objective. There will, of course, be impacts either way, and a more careful drafting of this should presumably have said 'net negative impacts'.

If Cory does not provide proper evidence to support a no loss/net gain claim, and if Council Officers never-the-less recommend approval, we fully expect the relevant officers to provide empirical evidence to substantiate such a claim and place this in the public domain, and not to simply repeat any unsubstantiated claim by the applicant as if it is the gospel truth, rather than in reality being one of Cory's paid people's opinions, as has happened at more than one recent planning committee meeting.

In our view the only way you can 'mitigate' away the negative biodiversity impacts and deliver anything approaching credible 'net gain' is to convert some nearby existing area of concrete and tarmac of low biodiversity value into high quality open mosaic habitat with areas suitable for Skylark breeding. A smoke-and-mirrors exercise that simply 'improves' some existing area that is a SINC or otherwise already important for wildlife, whilst claiming that some great new wildlife habitat has somehow been created (out of thin air ...) is not an acceptable substitute. We expect Bexley officers to explain where this will be done if they recommend acceptance of these latest more detailed plans. As noted above, outside of the Borough will not acceptable.

## **DECISION**

We were assured from the platform by the then head of planning Susan Clark, at the meeting which determined the outline application, that if the conditions were not met, then the scheme would be refused. We submit that the application breaches Council policy positions and fails to meet – and indeed is incapable of meeting - a number of key conditions and should be so rejected.

**ENDS**