

# Riverside Energy Park

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## Environmental Statement Technical Appendices

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APPENDIX:

# A.3

PLANNING INSPECTORATE REFERENCE NUMBER:

**EN010093**

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DOCUMENT REFERENCE:

**POLICY BACKGROUND**

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November 2018 | Revision 0 | APFP Regulation 5(2)(a)

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Planning Act 2008 | Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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## Appendix A.3 Planning policy context

### A.3.1. National Planning Policy Context

#### National Policy Statements

A.3.1. Policy related to Nationally Significant Infrastructure Projects (NSIPs) is contained in National Policy Statements. The relevant NPSs for Riverside Energy Park (REP) are:

- Overarching National Policy Statement for Energy (EN-1)
- National Policy Statement for Renewable Energy Infrastructure (EN-3)
- National Policy Statement for Electricity Networks Infrastructure (EN-5)

A.3.2. A summary of policies contained in the NPSs which are applicable to REP is contained in Chapter 2 of the ES and therefore not repeated here.

#### National Planning Policy Framework (2018)

A.3.3. The revised National Planning Policy Framework was published in July 2018 (NPPF 2018). The document sets out the Government's planning policies and how these are expected to be applied. The NPPF 2018 emphasises the importance of National Policy Statements (NPSs) for major infrastructure in the determination of Nationally Significant Infrastructure Projects (NSIPs), whilst also noting that:

*“The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy”.*

A.3.4. The central theme of the NPPF 2018 is the presumption in favour of sustainable development and the supporting core planning principles include the protection and conservation of the natural, built and historic environment and the promotion of sustainable growth and development. Key policies relevant to the Proposed Development are summarised below.

A.3.5. Chapter 4 (Decision-making) expects local planning to approach decision on proposed development in a positive and creative way. Paragraph 54 on planning conditions and obligations states:

*“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”*

- A.3.6. Chapter 6 (Building a strong, competitive economy) places a strong emphasis on supporting business growth and improved productivity stating that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*” (paragraph 80).
- A.3.7. Paragraph 82 states planning decisions should recognise and address the specific locational requirements of different sectors.
- A.3.8. Chapter 8 (Promoting healthy and safe communities), paragraph 92, encourages planning decisions to plan positively for the provision of community facilities and other local services to enhance the sustainability of communities and residential environments.
- A.3.9. Chapter 9 (Promoting sustainable transport) encourages appropriate opportunities to promote sustainable transport modes. Paragraph 108 states that planning decisions should ensure that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- A.3.10. Paragraph 109 expects development to “*only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*”
- A.3.11. Chapter 11 (Making effective use of land) encourages policies and decision to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- A.3.12. Paragraph 119 states LPAs should take a proactive role in identifying and helping to bring forward land, including suitable sites on brownfield registers.
- A.3.13. Chapter 12 (Achieving well-designed places) states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 128 states that “*Design quality should be considered throughout the evolution and assessment of individual proposals*” and that “*Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests*”.
- A.3.14. The NPPF 2018 explicitly supports the transition to a low carbon future and encourages the development of renewable energy generation infrastructure. Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) recognises that planning plays a key role in supporting the delivery of renewable and low carbon energy and associated infrastructure. Under this policy applicants are not required to demonstrate the overall need for renewable

or low carbon energy and local authorities should recognise that such projects provide a valuable contribution to cutting greenhouse gas emissions (paragraph 154a).

- A.3.15. In respect of flood risk, paragraph 155 states that: *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”*.
- A.3.16. Paragraph 158 states that the sequential approach should be applied in areas at risk of flooding in order to steer new development to areas with the lowest risk of flooding. However, Paragraph 162 confirms that the sequential test does not need to be undertaken for planning applications located on allocated sites evidenced by a sequential test although the exception test may need to be applied if relevant aspects of the proposal have not been considered at the plan-making stage or if more recent information about existing or potential flood risk should be considered.
- A.3.17. Paragraph 160 states that the exception test is passed where the following can be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- A.3.18. Chapter 15 (Conserving and enhancing the natural environment), paragraph 170 states that planning decisions should contribute to and enhance the natural and local environment by:
- a. *“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
  - b. *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
  - c. *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
  - d. *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*

- e. *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*”

A.3.19. Paragraph 175 refers to the need to conserve and enhance biodiversity through the application of four principles:

- If significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- Proposed Development likely to have an adverse effect on a SSSI should not normally be permitted;
- Development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- Opportunities to incorporate biodiversity improvements in and around developments should be encouraged especially where this can secure measurable net gains for biodiversity.

A.3.20. Paragraph 178 require that planning decision should ensure that *“a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation”*.

A.3.21. Paragraph 180 identifies the need to ensure that the effects of pollution on health, the natural environment or general amenity has been considered in decision-making. Sources of pollution include: ground conditions (paragraph 178), lighting (paragraph 180), noise (paragraph 180) and air pollution (paragraph 181).

A.3.22. Paragraph 180 states planning decisions should: a) mitigate and reduce potential adverse impacts resulting from noise from new development to a minimum and also avoid noise giving rise to significant adverse impacts on health and the quality of life; and b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

A.3.23. Paragraph 181 states that planning decisions should *“sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications”*. Planning decisions should also *“ensure*

*that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”*

- A.3.24. Paragraph 182 states that *“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed”*.
- A.3.25. Chapter 16 ‘Conserving and enhancing the historic environment’ sets out the Government’s policies for the conservation and enhancement of designated and non-designated features of the historic environment.
- A.3.26. Paragraph 189 and 190 state that planning decisions should be based on the significance of the heritage asset and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to understand the potential impact of the proposal upon the significance of that asset.
- A.3.27. When considering impacts on the significance of a designated heritage asset paragraph 193 states that great weight should be given to the asset’s conservation irrespective of whether the harm amounts to substantial harm, total loss or less than substantial harm.
- A.3.28. Paragraph 194 states that any harm to a designated heritage asset should require clear and convincing justification and that substantial harm to grade II listed assets should be exceptional and substantial harm to grade II\* or grade I listed assets should be wholly exceptional.
- A.3.29. Paragraph 196 states that where development will lead to less than substantial harm to a designated heritage asset then this harm should be weighed against the public benefits of the proposal including securing its optimum viable use.
- A.3.30. Paragraph 197 specifies that the effect of proposals on the significance of non-designated assets should also be considered. This paragraph requires the decision-maker to take into account the effect on the significance of non-designated heritage assets and to take a balanced judgement to be made having regard to the scale of harm or loss and the significance of the asset(s) potentially affected.

### **National Planning Policy for Waste (2014)**

- A.3.31. The National Planning Policy for Waste (NPPW) was published in October 2014, setting out the Government’s ambition to develop a more sustainable and efficient approach to resource use and management.



- A.3.32. The NPPW recognises that planning can help to deliver the Waste Management Plan for England (2013) by helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment.
- A.3.33. Section 4 states that local authorities should identify sites for waste management facilities in local plans and that waste planning authorities should consider the suitable siting of energy recovery facilities to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers.
- A.3.34. Section 7 on determining planning applications, point 5, states that waste planning authorities should *“concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced”*
- A.3.35. Appendix B states that in considering the suitability of sites, waste planning authorities should consider the factors below in determining planning applications:
- a. Protection of water quality and resources and flood risk management: considerations will include the proximity of vulnerable surface and groundwater or aquifers. The suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination, will also need care.
  - b. Land instability: locations that are liable to be affected by land instability, will not normally be suitable for waste management facilities.
  - c. Landscape and visual impacts: considerations will include (i) the potential for design-led solutions to produce acceptable development which respects landscape character; (ii) the need to protect landscapes or designated areas of national importance (National Parks, the Broads, Areas of Outstanding Natural Beauty and Heritage Coasts) (iii) localised height restrictions.
  - d. Nature conservation: considerations will include any adverse effect on a site of international importance for nature conservation (Special Protection Areas, Special Areas of Conservation and Ramsar Sites), a site with a nationally recognised designation (Sites of Special Scientific Interest, National Nature Reserves), Nature Improvement Areas and ecological networks and protected species.
  - e. Conserving the historic environment: considerations will include the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting.
  - f. Traffic and access: considerations will include the suitability of the road network and the extent to which access would require reliance on local roads, the rail network and transport links to ports.

- g. Air emissions, including dust: considerations will include the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled using appropriate and well-maintained and managed equipment and vehicles.
- h. Odours: considerations will include the proximity of sensitive receptors and the extent to which adverse odours can be controlled using appropriate and well-maintained and managed equipment.
- i. Vermin and birds: considerations will include the proximity of sensitive receptors. Some waste management facilities can attract vermin and birds and where birds congregate in large numbers, they may be a major nuisance to people living nearby and cause a hazard to aircraft at locations where close to aerodromes or low flying areas. The primary aim is to guard against new or increased hazards caused by development. The most important types of development in this respect include facilities intended for the handling of household or commercial wastes.
- j. Noise, light and vibration: considerations will include the proximity of sensitive receptors. The operation of large waste management facilities can produce noise affecting both the inside and outside of buildings, including noise and vibration from goods vehicle traffic movements to and from a site. Intermittent and sustained operating noise may be a problem if not properly managed particularly if night-time working is involved. Potential light pollution aspects will also need to be considered.
- k. Litter: litter can be a concern at some waste management facilities.
- l. Potential land use conflict: proposed development should be considered taking account of site suitability for the envisaged waste management facility.

### **Planning Practice Guidance (online resource)**

A.3.36. The Planning Practice Guidance (PPG) was first published as an online resource in March 2014; it provides detailed guidance on implementing the NPPF policies which is updated on a regular basis. The key sections of the PPG which may have a bearing on REP are listed below:

- Air quality;
- Climate change;
- Conserving and enhancing the historic environment;
- Environmental Impact Assessment;
- Flood risk and coastal change
- Land affected by contamination;

- Land Stability;
- Natural environment: noise;
- Renewable and low carbon energy; and
- Waste.

### Noise Policy Statement for England

A.3.37. The Noise Policy Statement for England (NPSE) was published in March 2010 by the Department for Environment, Food and Rural Affairs (DEFRA). The document seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. It also sets out the long term vision of Government noise policy:

*“To promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.”*

A.3.38. The NPSE clarifies that noise should not be considered in isolation of the wider benefits of a scheme or development, and that the intention is to minimise noise and noise effects as far as reasonably practicable having regard to the underlying principles of sustainable development.

A.3.39. The NPSE defines two established concepts from toxicology as applied to noise impacts by organisations such as the World Health Organisation. They are:

- NOEL – No Observed Effect Level - the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise; and
- LOAEL – Lowest Observed Adverse Effect Level - the level above which adverse effects on health and quality of life can be detected.

A.3.40. The NPSE extends these to the concept of a significant observed adverse effect level:

- SOAEL – Significant Observed Adverse Effect Level - The level above which significant adverse effects on health and quality of life occur.

A.3.41. The NPSE notes, in paragraph 2.22, *“It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times”.*

### UK Post-2010 Biodiversity Framework

A.3.42. The UK Post-2010 Biodiversity Framework was published in July 2012. It was produced by Joint Nature Conservation Committee (JNCC) and the Department for Environment, Food and Rural Affairs (Defra), on behalf of the Four Countries'

Biodiversity Group (4CBG), through which the environment departments of all four governments in the UK work together.

- A.3.43. The Framework covers the period from 2011 to 2020 and identifies the activities required to complement the country biodiversity strategies, and where work in the country strategies contributes to international obligations.
- A.3.44. Many of the tools developed under the UK Biodiversity Action Plan ('UKBAP') remain of relevance; for example, information about the lists of priority habitats and species, which can be found on the priority species and habitats web-pages. The lists of priority species and habitats agreed under UK BAP still form the basis of much biodiversity work in the countries and have been adopted as the list of Habitats and Species of Principal Importance for the purpose of conserving biodiversity, which are required to be identified and taken into consideration in accordance with Section 41 of the Natural Environment and Rural Communities Act, 2006.

### A.3.2. Regional Planning Policy Context

- A.3.45. At the regional level, The London Plan (consolidated with alterations since 2011) was published in March 2016. The London Plan policies that are relevant are summarised in the table below:

Table A3.1 London Plan relevant policies

Theme	Policy / Objective
Strategic vision and objectives	<p>Policy 1.1 (Delivering the strategic vision and objectives for London)</p> <p>States that growth and change in London will be managed to realise the Mayor's vision for London's sustainable development to 2036. This includes six key objectives including a city that meets the challenges of economic and population growth.</p>
Inner London	<p>Policy 2.13 (Opportunity areas and intensification areas)</p> <p>The Mayor will encourage boroughs to implement planning frameworks to realise the potential of OAs and development proposals within OAs should support the strategic policy directions set out in Annex A.</p> <p>Annex A allocates the Bexley Riverside OA for a minimum of 4,000 new homes and 7,000 new jobs by 2031 recognising that planned improvements in public transport accessibility (especially Crossrail 1) will provide scope for intensification. Annex A emphasises that development proposals should take account of the area's strategically</p>

Theme	Policy / Objective
	<p>important role in waste management, logistics facilities (Howbury Park) and safeguarded wharves on the River Thames.</p> <hr/> <p>Policy 2.17 (Strategic Industrial Locations (SILs))</p> <p>The Mayor will protect designated SILs for industrial activities and other related uses including waste management and environmental industries (such as renewable energy generation) and utilities. Part B states that development proposals in SILs should be refused unless they fall within the broad type of industrial activities outlined in this Policy. Part C states that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations.</p>
Climate change	<p>Objective: <i>“A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy and consuming fewer resources and using them more effectively.”</i></p> <hr/> <p>Policy 5.1 (Climate change mitigation)</p> <p>Aims to reduce London’s carbon dioxide emissions to 60% below 1990 levels by 2025.</p> <hr/> <p>Policy 5.2 (Minimising carbon dioxide emissions)</p> <p>Development proposals should contribute to minimising carbon dioxide emissions in accordance with the energy hierarchy: 1 Be lean: use less energy; 2 Be clean: supply energy efficiently; and 3 Be green: use renewable energy.</p> <hr/> <p>Policy 5.3 (Sustainable design and construction)</p> <p>Sustainable design standards should be integral to the construction and operation of proposals in order to improve the environmental performance of new development and adapt to the effects of climate change.</p> <hr/> <p>Policy 5.4A (Electricity and gas supply)</p>

Theme	Policy / Objective
	<p>States that the Mayor will work with the boroughs and energy companies to support appropriate development proposals for gas and electricity infrastructure which address identified energy requirements.</p>
	<p>Policy 5.5 (Decentralised energy networks)</p> <p>Aims for 25% of heat and power used in London to be generated by localised decentralised energy (DE) systems by 2025. This policy identifies that energy from waste plants will provide an important source of energy for London’s future district heating networks.</p>
	<p>Policy 5.7 (Renewable energy)</p> <p>Aims to increase the proportion of energy generated from renewable sources. Requires that in preparing local plans renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets and air quality.</p>
	<p>Policy 5.8 (Innovative energy technologies)</p> <p>States that the Mayor will support the use of innovative energy technologies to reduce use of fossil fuels and carbon dioxide emissions including conversion technologies such as anaerobic digestion, gasification and pyrolysis for the treatment of waste.</p>
	<p>Policy 5.12 (Flood risk management)</p> <p>States that development proposals should comply with NPPF policies on flood risk, the associated technical Guidance on flood risk and have regard to the EA Thames Estuary 2100 Plan and Catchment Flood Management Plans. The policy sets out criteria in respect of the Exception Test and development adjacent to flood defences, requiring that development is set back from defences to allow their management, maintenance and upgrading.</p>

Theme	Policy / Objective
	<p>Policy 5.13 (Sustainable drainage)</p> <p>Outlines a drainage hierarchy for the control and disposal of surface water run-off, requiring that SuDS are used unless there are practical reasons for not doing so.</p>
	<p>Policy 5.14 (Water quality and wastewater infrastructure)</p> <p>Requires that water quality is protected and improved, having regard to the Thames River Basin Management Plan.</p>
	<p>Policy 5.15 (Water use and supplies)</p> <p>Requires, inter alia, that development minimises the use of mains water and that rainwater harvesting is promoted.</p>
	<p>Policy 5.16 (Waste net self-sufficiency)</p> <p>Aims to manage 100% of London’s waste within London and achieve zero biodegradable or recyclable waste to landfill by 2026. The policy recognises that generating low carbon energy from non-recyclable waste will help achieve these aims while creating environmental and economic benefits from waste processing.</p>
	<p>Policy 5.17 (Waste capacity)</p> <p>Identifies the need to increase London’s waste processing capacity as a Mayoral priority and states that waste management proposals will be evaluated in terms of: locational suitability; proximity to the waste sources; achieving high reuse performance; achieving a positive carbon outcome; environmental impact and transport impact.</p> <p>Energy from waste facilities are required to meet a minimum CO<sub>2</sub>eq performance of 400 grams of CO<sub>2</sub>eq per kilowatt hour (kwh) of electricity produced. Furthermore, opportunities should be taken to provide combined heat and power and combined cooling heat and power.</p>
	<p>Policy 5.21 (Contaminated Land)</p> <p>The Mayor supports bringing contaminated land in to beneficial use through the remediation of contaminated</p>

Theme	Policy / Objective
	<p>sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment. Appropriate measures should be taken to ensure that development on contaminated land does not activate or spread contamination.</p>
Transport	<p>Policy 6.1 (Strategic approach)</p> <p>The Mayor will improve the integration of transport and development by increasing the use of the Blue Ribbon Network, especially the Thames, for freight use and facilitating the efficient distribution of freight whilst minimising its impacts on the transport network.</p>
	<p>Policy 6.3 (Assessing effects of development on transport capacity)</p> <p>Requires development proposals to assess impacts on transport capacity and the transport network and states that development should not adversely affect safety on the transport network. The policy states that Transport Assessments should be prepared in accordance with TfL's Transport Assessment Best Practice Guidance and construction logistics plans and delivery and servicing plans should be in accordance with the London Freight Plan.</p>
	<p>Policy 6.9 (Cycling)</p> <p>The Mayor will seek to increase cycling prevalence in London through ensuring development provides appropriate cycle parking and creating decluttered streetscapes that provide access for all.</p>
	<p>Policy 6.10 (Walking)</p> <p>The Mayor will seek to increase walking in London through creating high quality pedestrian environments and simplified, decluttered streetscapes that provide access for all.</p>



Theme	Policy / Objective
	<p>Policy 6.13 (Parking)</p> <p>Presents the approach to parking provision, with maximum standards for car parking and minimum standards for cycle parking.</p> <hr/> <p>Policy 6.14 (Freight)</p> <p>States that the Mayor will work to improve freight distribution and promote movement of freight by rail and waterway to help relieve congestion within London. The policy encourages the increased use of the blue ribbon network for freight transport and the uptake of construction logistics plans, delivery and servicing plans and more innovative freight solutions in order to minimise congestion and improve safety.</p>
<p>Living spaces and places</p>	<p>Policy 7.7 Location and Design of Tall and Large Buildings</p> <p>Sets out the design standards and locational preferences for tall buildings. The policy requires that tall and large buildings do not affect their surroundings adversely in terms of noise, amongst other considerations.</p> <hr/> <p>Policy 7.8 Heritage assets and archaeology</p> <p>States that development should identify, value, conserve, restore, re-use and incorporate heritage assets. Where development affects heritage assets and their settings, proposals should conserve their significance, by being sympathetic to their form. The policy goes on to note that new development should make provision for the protection of archaeological resources, landscapes and significant memorials.</p> <hr/> <p>Policy 7.13 Safety, security and resilience to emergency</p> <p>States that development proposals should contribute to the minimisation of potential physical risks. Development should also include measures to design out crime and terrorism.</p> <hr/> <p>Policy 7.13 Safety, security and resilience to emergency</p>

Theme	Policy / Objective
	<p>States that development proposals should contribute to the minimisation of potential physical risks. Development should also include measures to design out crime and terrorism.</p> <hr/> <p>Policy 7.14 Improving air quality</p> <p>Expects development proposals to minimise exposure to existing poor air quality and promote sustainable design and construction to reduce emissions. Development proposals should <i>“promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the Greater London Authority and London Councils’ ‘The control of dust and emissions from construction and demolition’”</i>. Development should not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs).</p> <p>Development is required to be at least ‘air quality neutral’ and that where provision needs to be made to reduce emissions, this is to be made on-site. Furthermore, where <i>“development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations. Permission should only be granted if no adverse air quality impacts from the biomass boiler are identified”</i>.</p> <p>The Policy states that boroughs should have policies that <i>“seek reductions in levels of pollutants referred to in the Governments National Air Quality Strategy having regard to the Mayor’s Air Quality Strategy”</i> and take <i>“account of the findings of the Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated”</i>.</p> <hr/> <p>Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes</p> <p>States that development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of the new development. Proposals are supported that improve and enhance the acoustic environment, and mitigate and</p>

Theme	Policy / Objective
	<p>minimise the existing and potential adverse impacts of noise.</p> <p>The policy notes that development proposals should utilise new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.</p>
	<p>Policy 7.17 Metropolitan open land</p> <p>The Mayor strongly supports the current extent of Metropolitan Open Land (MOL) and inappropriate development on MOL will be refused, except in very special circumstances. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.</p>
	<p>Policy 7.19 Biodiversity and access to nature</p> <p>Expects development proposals to wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. Developments that have a significant adverse impact on European or nationally designated sites, protected species or priority species will be resisted.</p>
	<p>Policy 7.20 Geological conservation</p> <p>States that all development proposals should, wherever possible, make a positive contribution to the protection and enhancement of geodiversity. Development should be resisted where they have significant adverse impacts on existing/proposed European or national designations, and protect regionally important geological sites.</p>
	<p>Policy 7.26 Increasing the use of the blue ribbon network for freight transport</p> <p>Expects development proposals to protecting existing facilities for waterborne freight traffic. It goes on to note that proposals adjacent to safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance. Development close to waterways should maximise water transport for bulk materials especially during construction.</p>

Theme	Policy / Objective
	<p>Policy 7.29 The River Thames</p> <p>Notes the role of the River Thames as a strategically important and iconic feature of London. Development proposals within the Thames Policy Area identified in LDFs should be consistent with the Thames Strategy.</p>

A.3.46. A summary of the relevant Mayoral guidance and strategy documents is set out in the table below:

Table A3.2 Relevant Mayoral strategy and planning guidance documents

Document	Policy/ Objectives
<p>London Environment Strategy (LEnvS) (2018)</p>	<p>Sets out the Mayor’s integrated Environment Strategy which outlines actions to improve the environment including specific draft policies and targets for air quality, climate change mitigation and energy, and waste. The Mayor is required to prepare a London Environment Strategy by the Greater London Authority Act 1999, as amended by the Localism Act 2011.</p>
<p>Mayor’s Transport Strategy (MTS) (2018)</p>	<p>Sets out the Mayor’s policies and proposals to reshape transport in London over the next 25 years with an emphasis on healthy streets and promoting sustainable travel. Its three main themes which comprise: healthy streets and healthy people; a good public transport experience; and new homes and jobs.</p>
<p>London Riverside Opportunity Area Planning Framework (OAPF) (2015)</p>	<p>The OAPF puts forward strategies to guide the regeneration of the area setting out how the Mayor’s planning, transport, housing and land functions can be coordinated to maximise the public benefit to Londoners.</p>
<p>The Control of Dust and Emissions During Construction and Demolition SPG (2014)</p>	<p>Sets out the requirements for an ‘Air Quality and Dust Risk Assessment (AQDRA)’ to be submitted at the time of a planning application, with an ‘Air Quality and Dust Management Plan’ (AQDMP) submitted prior to commencement of works.</p>

Document	Policy/ Objectives
<p>Sustainable Design and Construction SPG (2014)</p>	<p>The SPG provides guidance on flooding/flood risk management, sustainable drainage and flood defences and requires that surface water run-off from developments is limited to greenfield rates.</p> <p>With regard to noise, the SPG states that <i>“noise should be reduced at source and then designed out of a scheme to reduce the need for mitigation measures”</i>.</p> <p>The SPG also provides guidance on land contamination. This includes the Mayors priorities in which <i>“Developers should set out how existing land contamination will be addressed prior to the commencement of their development”</i>.</p>
<p>Shaping Neighbourhoods: Character and Context SPG (2014)</p>	<p>Provides specific guidance on the attributes of character and context in London (physical, cultural, social, economic, perceptions and experience) and information on resources that inform an understanding of character and context in London.</p> <p>The document also presents an analysis of the interrelationships between different aspects of character and examples of good practice in how an understanding of character and context can be used to help manage change in a way that enhances the positive attributes of a place.</p>
<p>London’s Wasted Resource: The Mayor’s Municipal Waste Management Strategy (MMWMS) (2011)</p>	<p>Sets policies for the management of London’s municipal waste between 2011 and 2031 which recognise the Mayor’s vision to develop a low carbon economy by minimising the negative environmental impacts of waste and exploiting its economic benefits.</p>
<p>Managing risks and increasing resilience: The Mayor’s climate change adaptation strategy (2011)</p>	<p>Sets out the Mayor’s detailed approach to manage the current and future risks that climate change poses to the Capital.</p>

Document	Policy/ Objectives
Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy (2011)	Sets out the Mayor's strategic approach to secure a low carbon energy supply and limited further climate change in London.
Making Business Sense of Waste: The Mayor's Business Waste Strategy for London (2011)	Sets out the Mayor's strategy for managing London's business waste.
Thames Estuary 2100 Plan	The Plan sets out a strategy for managing flood risk on the Thames Estuary area throughout this century. The Application Site lies within the Thamesmead Policy Unit and the recommended flood risk management policy for this area is to take further action to keep up with climate and land use change so that flood risk does not increase.

### A.3.3. Emerging Regional Planning Policy Context

#### Draft London Plan

- A.3.47. The Mayor published the Draft London Plan for consultation between 1 December 2017 and 2 March 2018 and subsequently published the Draft London Plan showing Minor Suggested Changes on 13 August 2018. The published provisional timetable indicates that the new London Plan will be examined in early 2019 and the final plan published by Autumn 2019.
- A.3.48. The NPPF 2012 is referenced in Chapters 6-14 of the ES in relation to the draft London Plan policies. The SoS letter issued on 27<sup>th</sup> July 2018 confirms that, although the draft London Plan will be examined against the NPPF 2012, the published London Plan should be reviewed immediately to ensure it is consistent with the NPPF. Thus, where there is a policy conflict with draft London Plan policies which are based on the NPPF 2012 the NPPF takes precedence. The table below summarises Draft London Plan policies that are relevant.

Table A3.3 Draft London Plan relevant policies

Theme	Policy / Objective
Chapter 1 Planning London's Future	Chapter 1 sets out six Good Growth Policies which frame the objectives of the plan (Policies GG1-6).
	Policy GG1 – Building strong and inclusive communities <i>Seeks to “to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city.”</i>
	Policy GG2 – Making the best use of land <i>“those involved in planning and development must... enable the development of brownfield land, prioritising Opportunity Areas, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, and sites within and on the edge of town centres, as well as utilising small sites.”</i>
	Policy GG3 – Creating a healthy city Aims to improve Londoners health and reduce health inequalities. The policy states a push to <i>“improve London’s air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.”</i>
	Policy GG5 – Growing a good economy Aims to <i>“conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners and “Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.”</i>
	Policy G–6 - Increasing efficiency and resilience Aims to <i>“improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050”.</i>
Chapter 2 Spatial Development Patterns	Policy SD1 - Opportunity Areas Sets out policy to ensure that OAs fully realise their growth and regeneration potential. This relates to Bexley Riverside OA and Thamesmead and Abbeywood OA.

Theme	Policy / Objective
Chapter 3 Design	<p>Policy D2 - Delivering good design Sets out processes and actions aimed at ensuring development delivers good design.</p>
	<p>Policy D7 Public realm Identifies the criteria which should be considered when designing areas of public realm.</p>
	<p>Policy D10 Safety, security and resilience to emergency Requires that <i>“Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards”</i>.</p>
	<p>Policy D11 Fire safety Requires that development proposals must achieve the highest standards of fire safety.</p>
	<p>Policy D12 Agent of Change Places the responsibility for mitigating impacts from existing noise-generating activities on proposed new development.</p>
	<p>Policy D13 Noise Sets out criteria by which development proposals should manage noise to reduce, manage and mitigate noise to improve health.</p>
Chapter 6 Economy	<p>Policy E4 Land for industry, logistics and services to support London’s economic function  Requires that <i>“A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained”</i> and that provision is made for the operational requirements of waste management and utilities infrastructure such as energy and water. Prioritises the retention of additional industrial capacity in locations that are accessible to the strategic road network or have potential for the transport of goods by rail and/or water transport.</p>



Theme	Policy / Objective
	<p>Policy E5 Strategic Industrial Locations (SIL)</p> <p>Requires that SILs (including Belvedere Industrial Area) <i>“should be managed proactively... to sustain them as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy”</i>. Supports development proposals in SILs where the uses proposed fall within the broad industrial-type activities, including utilities infrastructure.</p> <hr/> <p>Policy E8 - Sector growth opportunities and clusters</p> <p>States that sector-specific employment opportunities and business growth opportunities should be supported.</p>
Chapter 7 Heritage and Culture	<p>Policy HC1 Heritage conservation and growth</p> <p>Sets out requirements for developments in respect of conserving heritage assets, and their settings, and the identification of assets of archaeological significance and avoidance or minimisation of harm through design and appropriate mitigation.</p> <p>The policy also notes that <i>“where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use”</i>.</p>
Chapter 8 Green Infrastructure and Natural Environment	<p>Policy G3 Metropolitan Open Land</p> <p>Seeks to protect MOL from inappropriate development.</p> <hr/> <p>Policy G4 Local green and open space</p> <p>Requires the protection of local green and open spaces.</p> <hr/> <p>Policy G6 Biodiversity and access to nature</p> <p>States that Sites of Importance for Nature Conservation (SINCs) should be protected and that the greatest protection should be given to the most significant sites.</p> <hr/> <p>Policy G7 Trees and woodlands</p> <p>Requires that <i>“Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the</i></p>

Theme	Policy / Objective
	<p><i>removal of trees, there should be adequate replacement...</i></p>
<p>Chapter 9 Sustainable Infrastructure</p>	<p>Policy SI1 Improving air quality</p> <p><i>Aims to “ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”.</i></p> <p>The policy notes that development proposals should not:</p> <ul style="list-style-type: none"> <li><i>a) “lead to further deterioration of existing poor air quality</i></li> <li><i>b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits</i></li> <li><i>c) reduce air quality benefits that result from the Mayor’s or boroughs’ activities to improve air quality</i></li> <li><i>d) create unacceptable risk of high levels of exposure to poor air quality.”</i></li> </ul>
	<p>Policy SI2 Minimising greenhouse gas emissions</p> <p><i>Aims for all major development to be net zero-carbon and achieve a minimum on-site reduction of at least 35% beyond Building Regulations (2013).</i></p> <p><i>Requires major development to include a detailed energy strategy to demonstrate how the zero-carbon target will be met and where it is clearly demonstrated that the zero-carbon target cannot be achieved on-site, any shortfall should be provided through:</i></p> <ul style="list-style-type: none"> <li><i>– “a cash in lieu contribution to the borough’s carbon offset fund, or</i></li> <li><i>– off-site provision provided that an alternative proposal is identified and delivery is certain.”</i></li> </ul> <p><i>The policy also states that “Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal)”.</i></p>

Theme	Policy / Objective
	<p>Policy SI3 Energy infrastructure</p> <p>Supports increasing the amount of new renewable energy sources in London and the development of energy masterplans for large-scale development locations. States that in locations where a heat network is planned but not yet in existence development should be designed for connection.</p>
	<p>Policy SI5 Water infrastructure</p> <p>Requires that <i>“In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner”</i>.</p>
	<p>Policy SI7 Reducing waste and supporting the circular economy</p> <p>Sets targets for waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal.</p>
	<p>Policy SI8 Waste capacity and net waste self-sufficiency</p> <p>Sets targets to manage London’s waste sustainably and criteria against which development proposals for new waste sites or to increase the capacity of existing sites should be evaluated.</p>
	<p>Policy SI9 Safeguarded waste sites</p> <p>States that <i>“Existing waste sites should be safeguarded and retained in waste management use”</i>.</p>
	<p>Policy SI12 Flood risk management</p> <p>States that <i>“Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed”</i>.</p> <p>The policy requires that <i>“current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure provided”</i>.</p>

Theme	Policy / Objective
	<p>Policy SI13 Sustainable drainage</p> <p>States that <i>“Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage”</i> and that <i>“Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improve water quality, and enhance biodiversity, urban greening, amenity and recreation.”</i></p> <hr/> <p>Policy SI15 Water transport</p> <p>States that <i>“Development proposals to facilitate an increase in the amount of freight transported on London’s waterways should be supported”</i> and that <i>“Development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases”</i>.</p>
<p>Chapter 10                      Transport</p>	<p>Policy T1 Strategic Approach to Transport</p> <p>Development Plans should support the <i>“strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041”</i> by:</p> <ul style="list-style-type: none"> <li>– Encouraging greater integration of land use and transport as well as further improvements to the public transport which creates greater connectivity;</li> <li>– Reducing congestion by encouraging a modal shift from car use to public transport;</li> <li>– Promoting consolidation of deliveries in order to minimise the delivery trips; and</li> <li>– Investing in high quality interchanges and rebalancing the public transport network to make active methods of travel more attractive.</li> </ul> <hr/> <p>Policy T2 Healthy Streets</p> <p>Encourages Development Plans to facilitate more trips by walking and cycling through improving street environments.</p>

Theme	Policy / Objective
	<p>Policy T3 Transport capacity, connectivity and safeguarding</p> <p>Seeks to safeguard transport enhancements including a crossing of the River Thames at Gallions Reach or Belvedere, public transport river crossings in east London, extension of river transport services in east London and the DLR extension from Gallions Reach to Thamesmead.</p>
	<p>Policy T4 Assessing and mitigating transport impacts</p> <p>Requires Transport Assessments to support applications for development, identifying where required, appropriate mitigation for transport impacts and ensuring that proposals don't increase road danger.</p>
	<p>Policy T5 Cycling</p> <p>Sets out the approach to removing barriers to cycling and creating environments in which people choose to cycle. It sets out the minimum cycle parking standards and the Mayor's aspirations for improvements to the strategic cycle network across London.</p>
	<p>Policy T6 Car Parking</p> <p>Sets out differing parking standards for Central Activities Zone, Inner London, Outer London and other parts of London for residential, office, retail, hotel, leisure and disabled person parking standards.</p>
	<p>Policy T7 Deliveries, servicing and construction</p> <p>States that development proposals should "<i>facilitate sustainable servicing and deliveries</i>" and requires that Construction Logistics Plans and Delivery and Servicing Plans should be developed "<i>in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments</i>".</p> <p>Requires that development proposals must consider the use of rail/water for the transportation of material and enable the use of safer, lower trucks with increased levels of direct vision.</p>

Theme	Policy / Objective
	<p>Policy T9 Funding transport infrastructure through planning</p> <p>Identifies the requirement to support transport infrastructure development through the Mayoral CIL and section 106 agreements.</p>

### Draft Economic Development Strategy for London

- A.3.49. The Draft Economic Development Strategy for London was published for consultation in December 2017. It identifies a need for substantial investment in new infrastructure, including energy and waste, to support economic growth across London. It identifies London’s industrial areas as essential to the functioning of the capital’s economy as they provide space for uses including waste and utilities operations.
- A.3.50. The strategy also identifies a need to recover value from waste materials and to remove the reliance on landfill for treating London’s waste, as available landfill capacity is expected to be reached by 2026. The strategy states that to achieve the aspiration of London becoming a zero-waste city, *“65 per cent of London’s municipal waste will be recycled and the rest turned to energy”*.

#### A.3.4. Local Planning Policy Context

- A.3.51. The Indicative Application Boundary falls within two local planning authorities, London Borough of Bexley (LBB) and Dartford Borough Council (DBC). The main REP site is wholly located within the LBB whilst the electrical connection route is located partially within the LBB and DBC administrative areas.
- A.3.52. The LBB Development Plan Framework consists of: Bexley Core Strategy (adopted 2012); Bexley Unitary Development Plan (UDP) Saved Policies (2004, updated in 2012); and the Bexley Energy Masterplan (adopted 2016). The Bexley Growth Strategy (adopted 2017) is intended to underpin future planning policy and should inform development and investment decisions in the borough although it is not a planning policy document.
- A.3.53. The DBC Development Plan consists of: Dartford Core Strategy (2011), the Dartford Development Policies Plan and Policies Map (2017), and the Kent Minerals and Waste Local Plan 2013-30 (2016).
- A.3.54. The Kent Local Transport Plan 4: Delivering growth without gridlock 2016-2031 may also be relevant.

### Bexley Local Plan Designations

A.3.55. Several local planning designations apply to the REP site. These are shown on the Bexley Saved UDP Policies Proposals Map (2004) and an extract is provided in **Figure A3.1**:

- Primary Employment site (Saved UDP Policy E3);
- Thames Policy Area and access to the riverside (Saved UDP Policies TS13 & TS14); and
- Protected view: the southern part of the REP site falls within a protected strategic viewing corridor (East London Panorama from Beckton Alps) (Saved UDP Policy ENV39)

A.3.56. The southern boundary of the REP Site adjoins land designated as Metropolitan Open Land (MOL) (Saved UDP Policy ENV14) and Area of Metropolitan Importance for Nature Conservation (Policies CS18 and CS17). Part of the Electrical Connection route (as shown on **Figure 1.2 Document Reference 6.2**) also passes through this land.

Figure A3.1 – Bexley Saved UDP Policy Map (2004)



### Bexley Core Strategy (2012)

A.3.57. The Bexley Core Strategy (2012) sets out the council's long term vision for the development of the borough up to 2026. The Core Strategy has a focus on the principles of sustainable development in the borough. **Table A3.4** sets out the policies that are relevant.

Table A3.4 Bexley Core Strategy relevant policies

Theme	Policy
Sustainable Development	<p>CS01 – Achieving Sustainable Development</p> <p>States that sustainable development will be achieved by maximising the effective and efficient use of natural and physical resources whilst addressing pollution issues, such as contamination, noise and air quality, to contribute to the health and well-being of the community and the environment.</p>
Flood Management	<p>CS08 – Climate Change and Flood Risk Management</p> <p>All developments should plan for, adapt to, and mitigate the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development. The Council will investigate opportunities for the funding and development of decentralised energy networks in the Belvedere Employment Area.</p>
Sustainability and the Environment	<p>CS09 – Using Bexley’s resources sustainably</p> <p>The Council will seek to maximise the effective and efficient use of natural and physical resources, while contributing to the health and wellbeing of the community and environment. The Council will support the decontamination and redevelopment of brownfield sites to support new housing and employment growth, particularly in the Thames Gateway growth area.</p>
	<p>CS13 - Access to jobs</p> <p>Seeks to ensure that residents in the borough are provided with opportunities to access training and a variety of local jobs. The Council will achieve this by:</p> <ul style="list-style-type: none"> <li>– <i>“supporting development proposals that diversify the local employment offer” (a);</i></li> <li>– <i>“supporting development proposals that intensify land-uses...” (b); and</i></li> <li>– <i>“reducing resident’s need to travel long distances by supporting the creation of a diverse local economy which offers a wide range of local job opportunities, ...” (c).</i></li> </ul>
	<p>CS17 – Green Infrastructure</p> <p>The Council will aim to protect, enhance, and promote Bexley’s green infrastructure such as open space and</p>



Theme	Policy
	<p>waterways. This includes protecting metropolitan open land from inappropriate development.</p> <p>CS18 – Biodiversity and Geology The Council will seek to protect and enhance its biodiversity and geological assets by complying with national and regional policy and guidance. Consideration will be given to potential impacts on the Thames Estuary and Marshes SPA. The Council will seek to protect, conserve and enhance Bexley’s SSSIs and SINCs. The Council will seek protection and enhancement of the natural habitat as far as practicable, seeking biodiversity enhancements and improved access to nature, particularly in areas of deficiency.</p>
Economy	<p>CS03 – Belvedere Geographic Region Identifies a future opportunity to link proposed regeneration areas at Veridion Park, Imperial Gateway and Tavy Bridge to the Riverside energy from waste incinerator by way of a high-pressure heat main. Requires that new development mitigates against all types of flood risk, through flood resilience and resistance.</p> <p>CS12 – Bexley’s future economic contribution The Council will allocate sufficient and appropriately located employment land (including Riverside) to meet the boroughs requirements and promote sustained economic and employment growth. Belvedere Employment Area is noted as one of two principal locations of employment uses.</p>
Transport	<p>CS15 – Integrated Transport System The Council will seek to improve the efficiency and sustainability of freight movement in the borough, while protecting viable safeguarded wharves on the River Thames.</p>
Heritage	<p>CS19 - Heritage and archaeology The Council will conserve and enhance the significance of heritage assets, their setting, and the wider historic environment. Where archaeological evidence is identified, it should be retained in situ wherever possible. Where archaeological evidence cannot be retained, the</p>

Theme	Policy
	appropriate levels of archaeological investigation and recording should be undertaken prior to the redevelopment of the site.
Waste	Policy CS20 Sustainable waste management The Council will support regionally significant waste management infrastructure. Development should ensure that waste is managed in a manner which protects human health and the environment and in accordance with the principles of the waste hierarchy.

### Bexley UDP (2004) Saved Policies (2012)

A.3.58. The Bexley UDP was adopted in 2004. Since 2004, many alterations to the document have occurred. In 2007, several UDP policies had expired and by 2012, some of the remaining policies were superseded by the adoption of the Bexley Core Strategy in 2012. The saved policies will continue to form part of Bexley’s Development Plan Framework until they are replaced by policies in the new Bexley Local Plan. **Table A3.5** sets out the saved policies that are relevant.

Table A3.5 relevant Bexley Saved UDP policies

Theme	Policy
General strategy	Policy G1 States that the Council will “ <i>seek to protect, maintain and improve the quality of the built and natural environment for the economic and social wellbeing of the borough whilst making efficient and effective use of the borough's land resources. In particular, proposals for development which would detract from the overall environmental quality of an area will not be acceptable</i> ”.
	Policy G4 States that the Council will “ <i>within available resources, seek to provide adequate means and opportunities for all sections of the borough's population to have access to housing, jobs, leisure, social and community facilities</i> ”.
Sustainability and the Environment	ENV15 - Metropolitan Open Land There will be a presumption against permitting the construction of new buildings, or the change of use of land or buildings on Metropolitan Open Land for purposes other than:

Theme	Policy
	<ul style="list-style-type: none"> <li>– agriculture and forestry;</li> <li>– predominantly open air recreation;</li> <li>– nature conservation;</li> <li>– educational and institutional uses in extensive grounds;</li> <li>– cemeteries; or</li> <li>– other uses which would maintain the open character or visual amenities of Metropolitan Open Land.</li> </ul> <p>ENV28 Local Nature Reserves</p> <p>The Council will declare and manage sites in which it has a legal interest and that are of special importance to the local community for wildlife and nature conservation as Local Nature Reserves (LNRs). Development will be resisted in these areas that would endanger the preservation of those special characteristics that lead to designation.</p> <p>ENV32 – Sites of Special Scientific Interest (SSSI)</p> <p>Development will not be permitted within SSSIs as indicated on the proposals map, unless it can be shown that there would be no damage to scientific or nature conservation interests.</p> <p>ENV33 – Development of land adjoining Sites of Special Scientific Interest</p> <p>Development will be resisted unless it can be shown that there would be no damage to scientific or nature conservation interests.</p> <p>ENV39 – Built Environment</p> <p>In order to protect and enhance the quality of the built environment, the Council will seek to ensure that all new developments, are satisfactorily located and of a high standard of design and layout. The Council will consider the extent to which the proposal:</p> <ul style="list-style-type: none"> <li>– is compatible with the character of the surrounding area, would not prejudice the environment of the occupiers of adjacent property, or adversely affect the street scene by reason of its (a) scale, (b) massing, (c) height, (d) layout, (e) elevational treatment, (f) materials and/or (g) intensity of development;</li> </ul>

Theme	Policy
	<ul style="list-style-type: none"> <li>– is appropriately landscaped, including the retention of appropriate trees and shrubs and the incorporation of public art where relevant;</li> <li>– has any unreasonable effect on the surrounding area by reason of noise and any emissions to land, air, or water, and is not, by reason of its location, itself adversely affected by such conditions as may already be in existence within the neighbourhood;</li> <li>– makes adequate provision for vehicle parking in accordance with the Council's vehicle parking standards;</li> <li>– takes due account of the need to deter crime, both against individuals and against public or private property whilst maintaining an attractive environment; and</li> <li>– takes into consideration important local and strategic views, particularly where the proposed development is one which significantly exceeds the height of its surroundings or is located on a prominent skyline ridge.</li> </ul>
	<p>ENV40 - Contamination and remedial treatment of land</p> <p>Sites that are known or suspected of being contaminated must undertake surveys to determine the source of any pollutants and any remedial measures necessary to prevent these causing hazards. The Council may require applicants to enter into a legal agreement to ensure that the necessary remedial measures are made.</p>
	<p>ENV41 - Air Quality Strategies</p> <p>The Council will require an applicant to prepare an Air Quality Assessment where proposals:</p> <ul style="list-style-type: none"> <li>– <i>“include industrial activities with potentially significant air borne emissions;</i></li> <li>– <i>have the potential to increase significantly the volume of traffic flows or the ratio of heavy goods vehicles, or the level of congestion so as to place air quality objectives at risk;</i></li> <li>– <i>have the potential to increase the personal exposure of individuals at non-occupational locations to levels of air pollution which are likely to exceed objectives set in either national or local Air Quality Strategies; and/or</i></li> <li>– <i>are located in (or are likely to effect) an Air Quality Management Area, which would significantly change</i></li> </ul>

Theme	Policy
	<p><i>the pattern of traffic flows or could lead to emissions of one or more of the pollutants specified in the national Air Quality Strategy.”</i></p> <p>The policy also states the “<i>The Council may resist or impose conditions on applications where an air quality assessment shows that the proposed development will have an adverse effect on the achievement of national or local air quality objectives</i>”.</p>
Economy	<p>E1 – Criteria for proposed industrial and commercial development</p> <p>Proposals for industrial uses will be resisted unless the following conditions are met:</p> <ul style="list-style-type: none"> <li>– there should be no material adverse effects on the health, safety or amenities of the occupants of residential areas or neighbouring properties;</li> <li>– the development is satisfactory in terms of design, scale and layout;</li> <li>– the development satisfies the requirements in Policy T6 with regards to effects on the local highway network and the availability of public transport, and adequate site access can be provided;</li> <li>– adequate provision is made for vehicle parking in accordance with the Council's current standards and turning space.</li> </ul> <p>In addition, the Council will take account of the following when considering proposals for industrial and commercial development:</p> <ul style="list-style-type: none"> <li>– provision of appropriate landscaping, including the retention of suitable trees and shrubs and nature conservation features; and</li> <li>– the need for safeguards against discharges from the development that could lead to the build-up of high levels of pollution or find their way into water courses.</li> </ul> <p>E3 - Primary Employment Areas</p> <p>The Council encourage industrial uses to locate in the Primary Employment Areas. Land within the Primary Employment Area will be safeguarded for industrial and commercial use only.</p>

Theme	Policy
	<p>E4 - Secondary Employment Areas</p> <p>The Council will support the development of secondary employment areas. Industrial and commercial uses are first preference in terms of use.</p>
Transport	<p>T6 – Optimising use of the existing transport network</p> <p>The Council will not support any development that would either cause local traffic flows to rise above the design flow for a road or would generate additional traffic on a road on which flows are already exceeded design flow.</p> <p>Development will only be supported if the affected road is included in an improvement programme that would increase capacity and the development is able to undertake un-programmed road improvements, and/or there are no environmental, or other planning or road traffic objections to such highway improvements taking place.</p>
	<p>Policy T17 - Off-street parking spaces</p> <p>Off-street parking spaces should be provided in new developments and located to discourage on-street parking and respect the amenity of nearby residents.</p>
Thames-side	<p>TS6 - Belvedere Industrial Area</p> <p>The Council will only permit the following uses within the Belvedere Industrial Area: business; storage and distribution; general industry; road haulage and supporting services; and hiring of plant and equipment except for in the Special Industrial Zones.</p> <p>The REP Site was previously designated as a Special Industrial Zone under now extant UDP Policy E13.</p>
	<p>TS13 – Thames Policy Area Character</p> <p>The Council will protect and enhance the Thames Policy Area, giving attention to achieving good quality design, and protection of views and the skyline. Providing an attractive and safe Riverside Walk along the Thames is also supported.</p>
	<p>TS14 – Developments on the Thames-side</p> <p>The Council requires all developments on the waterside of the River Thames to provide improved access to the</p>

Theme	Policy
	<p>waterside, and where appropriate, an extension of the publicly accessible river walk.</p> <hr/> <p>TS15 – Protection of wildlife on the Thames-side                      The Council will promote the protection of wildlife and the improvement for wildlife of the river and of habitats on Thames-side.                      Development that diminishes these habitats will be resisted.</p>
<p>Minerals and Waste</p>	<p>WAS2 - Waste processing                      Planning applications for the transfer, disposal and processing of waste must:</p> <ul style="list-style-type: none"> <li>– demonstrate no significant adverse amenity impacts on residential or commercial areas;</li> <li>– demonstrate no significant adverse environmental impacts (pollution, noise, smells, and traffic generation);</li> <li>– have good connections to primary and secondary roads;</li> <li>– use rail and river transport for the transport of waste wherever possible;</li> <li>– accord with the Waste Recycling Plan;</li> <li>– not conflict with Policy E13 and policies contained in Chapter 5; and</li> <li>– development for waste processing facilities, including energy from waste should be of an appropriate scale to ensure that waste is processed close to the point at which it is generated, in accordance with the proximity principle.</li> </ul>

**Bexley Energy Masterplan (2015)**

- A.3.59. The Bexley Energy Masterplan was published in 2015 and produced by consultants Ramboll. The Energy Masterplan sets out a framework for future energy supply options to support the Core Strategy sustainability targets. The study is centred on the Riverside Resource Recovery Facility (RRRF).
- A.3.60. Chapter 4 ‘Energy Supply Appraisal’ identifies RRRF as the primary heat source, the facility processes 670,000 tonnes of London’s waste per annum and generates a gross power output of over 60 MWe which supplies electricity around 100,000 homes. The Energy Masterplan recognises that the facility has

the necessary infrastructure for heat off-take to be provided without substantial alteration and estimates that around 28.6 MTh of heat is available for export to a heat network.

A.3.61. Chapter 6 'Heat Network Infrastructure Proposals' models the three-potential heat network route scenarios:

- Scenario 1: District Heat (DH) pipeline route extends along Yarnton Way and would require installation of pipes across the busy junction between the A2016;
- Scenario 2: DH pipeline route extends along the A2041 requires the crossing of the Eastern Way dual carriageway possibly along the footbridge that currently crosses Eastern Way; and
- Scenario 3: extending the DH pipeline route south east from the RRRF requires a long stretch of pipe along the Bronze Age Way (A2016) and three road crossings.

A.3.62. Chapter 7 present a techno-economic analysis of the three DH scenarios and the key findings are summarised below:

- Scenarios 1 and 2 present a good opportunity for utilising heat from the RRRF to serve the Peabody Thamesmead housing and nearby developments since both scenarios are found to generate IRRs that would be attractive to private sector Energy Service Companies (ESCOs);
- Scenario 3a DH network route into Erith presents a good opportunity for utilising heat from the RRRF, although at a lower heat sale price, it is at the borderline of being attractive to a private sector ESCo; and
- Scenario 3b does not present high enough Internal Rate of Return (IRR) to attract private investment from an ESCo. However, the IRRs reach 7% at the mid-range heat and electricity sale prices so there may be opportunity for a network with a larger proportion of public sector funding and involvement.

A.3.63. The study identifies an opportunity for the RRRF to supply heat to the Peabody Thamesmead housing estate, Belvedere Growth Area and Yarnton Way employment land developments as part of a new district heat network. The study recommends that Bexley pursue scenarios 1 and 2 and identifies potential for a connection across the Thames upon construction of a new crossing.

### **Bexley Growth Strategy (2017)**

A.3.64. The Bexley Growth Strategy was adopted in 2017, it details the Council's proposals to manage housing and economic growth, and associated supporting infrastructure. The strategy is not a planning policy document; however, the document is intended to inform future planning policy, including the emerging draft new Bexley Local Plan.



A.3.65. The document highlights the ambitions for economic development in Bexley:

- Economic Ambition 1 – Use growth to secure economic development;
- Economic Ambition 2 – Create a broader, more resilient and higher quality economic base;
- Economic Ambition 3 - Make Bexley a thriving and ambitious place of opportunity through education and employment; and
- Economic ambition 4 - Enhance Bexley’s image.

A.3.66. The Growth Strategy sets out a number of key economic objectives and those of relevance include:

- *“Economic objective 1: use growth to secure economic development;*
- *Economic objective 2: create a broader, more resilient and higher quality economic base; and*
- *Economic objective 3: make Bexley a thriving and ambitious place of opportunity through education and employment.”*

A.3.67. The vision for the growth area of Belvedere includes the provision of 8,000 new homes and 3,500 new jobs, made possible by changes in connectivity and infrastructure provision.

A.3.68. The document recognises that the delivery of growth is dependent on the close coordination of highway and utility planning. The Council will therefore seek to facilitate the coordinated delivery of utilities services under the highway.

A.3.69. The document highlights the protection and enhancement of biodiversity and strategic green corridors including the network of SINC’s.

A.3.70. The document also states that the Council will seek to use modern technology to identify cost effective utility solutions such as utilising existing heat sources (including the RRRF) to supply market competitive, low carbon energy to new developments and existing properties.

### **Thamesmead and Abbey Wood Supplementary Planning Document (SPD) (2009)**

A.3.71. The Thamesmead and Abbey Wood SPD was adopted by LBB and RBG in 2009, it identifies projects and guidance to guide the future development of the Thamesmead and Abbey Wood area. Section 3.3 (Key principles) supports the potential use of district heat networks and low carbon energy technologies to help meet current and future demand for energy.

### Dartford Local Plan Designations

- A.3.72. The Dartford Policies Map, adopted in 2017, identifies several designations on or around the Application Site. The Application Site is within a ‘Biodiversity Opportunity Area’ (Policy CS14/Policy DP26) ‘Borough Open Space’ (Policy CS14/Policy DP24), and an ‘Air Quality Management Zone’ (Policy DP5).
- A.3.73. The following designations also border the Application Boundary: ‘Employment Area’ (Policy CS7/Policy DP20), ‘Local Wildlife Site’ (Policy CS14/Policy DP25) and ‘Nature Improvement Area’ (Policy CS14/Policy DP25). The relevant Dartford Core Strategy policies are summarised in **Table A3.6** and **Table A3.7** provides summary of the relevant Dartford Development Policies Plan policies.

### Dartford Core Strategy (2011)

- A.3.74. The Dartford Core Strategy was adopted in 2011. The document sets out the Borough’s future needs in terms of housing, transport, growth, and the environment. The core principles drive the decision making within the borough. **Table A3.6** lists the policies that are relevant.

Table A3.6 Dartford Core Strategy relevant policies

Theme	Policy
Managing Development	<p>Policy CS8 - Economic Change</p> <p>The Council will seek a transformation of the economy by focusing on key growth sectors, including environmental technologies and construction.</p>
	<p>Policy CS9 - Skills and Training</p> <p>Seeks to ensure the provision of a locally skilled workforce to support the economic transformation of the borough, by requiring developments to contribute to the delivery of skills training and education commensurate with their size.</p>
Transport	<p>CS16 – Transport Investment</p> <p>The Council will seek an appropriate level of contributions from development, either financially or in kind, to fund the infrastructure required. Off-site transport improvements relating directly to an individual development, including site access and local junction and road improvements will be required through S106 and S278 agreements in addition to any pooled payments towards the Strategic Transport Infrastructure programme.</p>
Sustainability and the Environment	<p>CS14 – Green Space</p> <p>Aims to create approximately 300 ha of new or improved green spaces by 2026 and requires developments to</p>

Theme	Policy
	<p>contribute to the green grid network. New development should contribute to the green grid network as follows:</p> <ul style="list-style-type: none"> <li>– Sites of 20 ha and over: at least 30% of the site area as green space;</li> <li>– Sites of between 20ha and 2ha: at least 20% of the site area as green space; and</li> <li>– Sites of less than 2ha will be considered on a site by site basis.</li> </ul> <p>Where on-site open space is not appropriate or feasible, contributions may be sought for off-site improvements towards open space provision for community use, biodiversity enhancements and flood risk mitigation.</p> <p>The Council will protect and enhance existing open spaces, including locally important sites, areas of nature conservation, SSSIs, and local wildlife sites.</p>
	<p><b>CS23 – Minimising Carbon Emissions</b></p> <p>To minimise carbon emissions through energy efficiency and the use of renewable energy, the Council will:</p> <ul style="list-style-type: none"> <li>– Require all new developments to demonstrate that reductions in energy use through design and layout has been explored and applied.</li> <li>– New non-residential development over 1,000 sqm must meet BREEAM ‘excellent’.</li> <li>– Work in partnership to establish an enabling body to facilitate a local network generating and distributing decentralised energy, to maximise the opportunities for low/zero carbon generation.</li> </ul>
	<p><b>CS24 – Flood Risk</b></p> <p>To manage and mitigate flood risk, the Council will:</p> <ul style="list-style-type: none"> <li>– Ensure that sites in Flood Zone 2 and 3a, shown to be acceptable for development following application of the Sequential Test and that the Exception Test can be passed, and that residual risk is managed through a Flood Risk Assessment (FRA) and an appropriate Flood Plan;</li> <li>– Require the SuDS ‘management train’ to be applied, as appropriate, in all new development; and</li> <li>– Identify and implement a green infrastructure network through the safeguarding of existing areas of open space</li> </ul>

Theme	Policy
	and a requirement for generous provision of green space and water bodies in new development.
	<p>CS25 – Water Management</p> <p>The Council will manage the supply and quality of water and waste water treatment by:</p> <ul style="list-style-type: none"> <li>– Monitoring development to ensure that the pace of development does not outstrip the supply of water and waste water treatment capacity; and</li> <li>– Requiring all non-residential developments of 1,000sqm and above to meet the BREEAM ‘excellent’ standards of water efficiency.</li> </ul>

### Dartford Development Policies Plan (2017)

A.3.75. The Dartford Development Policies Plan was adopted in 2017 and forms the second part of the Dartford Local Plan. The plan sets out the main planning policies that will be used to assess planning applications. **Table A3.7** lists the policies that are relevant to the REP DCO application.

Table A3.7 Dartford Development Policies Plan relevant policies

Theme	Policy
Sustainable Development	<p>DP1 - Dartford’s Presumption in Favour of Sustainable Development</p> <p>The policy makes clear that DBC will work with applicants to “<i>enable appropriately located development that improves the economic, social and environmental conditions in the Borough</i>”.</p>
Design	<p>DP2 - Good Design in Dartford</p> <p>Requires the provision of good high quality design, including “<i>early consideration should be given to the achievement of on-site flood alleviation</i>”.</p>
Transport	<p>DP3 – Transport impacts of development</p> <p>Development will only be permitted where it is appropriately located and makes suitable provision to minimise and manage the arising transport impacts.</p>

Theme	Policy
	<p>Development will not be permitted where the localised residual impacts result in severe impacts on one or more of the following:</p> <ul style="list-style-type: none"> <li>– Road traffic congestion and air quality;</li> <li>– Safety of pedestrians, cyclists and other road-users; and</li> <li>– Excessive pressure for on-street parking.</li> </ul>
Sustainability and the Environment	<p><b>DP5 – Environmental and Amenity Protection</b></p> <p>Development will only be permitted where it does not result in unacceptable material impacts, individually or cumulatively, on neighbouring uses, the boroughs environment or public health. This includes noise disturbance or vibration; odour; light pollution; ground contamination; air and water quality; and intensity of use.</p> <p>Developments should not materially impede the continuation of existing use. Planning applications on or in the immediate vicinity of landfill sites must be accompanied by a full technical analysis of the site and its surroundings. Analysis must show that landfill gas will not be a hazard and that development will not cause adverse impacts on groundwater.</p>
	<p><b>DP11 – Sustainable technology and construction</b></p> <p>Development should be well located, innovatively and sensitively designed and constructed to tackle climate change, minimise flood risk and natural resource use and must aim to increase water efficiency.</p> <p>In determining applications for small and large-scale low/zero carbon technology and installations, the economic and environmental benefits of the proposal will be weighed against the individual and cumulative impact of the development.</p>
	<p>Development will only be permitted in line with national policy and where the following factors have been satisfactorily taken into consideration:</p> <ul style="list-style-type: none"> <li>– Character, and visual and residential amenity;</li> <li>– Landscape, topography, and heritage;</li> <li>– Shadow flicker and glare (if relevant);</li> <li>– Electronic and telecommunication interference/ navigation and aviation issues (if relevant);</li> </ul>

Theme	Policy
	<ul style="list-style-type: none"> <li>– Quality of agricultural land taken (where applicable);</li> <li>– Ensuring installations are removed when no longer in use and land is then restored;</li> <li>– Potential effects on Policies Map designations/ protected sites or areas in the Borough including Green Belt, heritage assets, and SSSIs/ areas of high biodiversity value; and</li> </ul> <p>Potentially significant water supply, flooding or wastewater implications.</p>
	<p>DP24 – Open space</p> <p>Development on playing fields, sports pitches, and land shown on the policies map will not be permitted unless it is demonstrated that one of the following criteria is satisfied:</p> <ul style="list-style-type: none"> <li>– Where the sports/open/green space will be retained in its current quality, with development limited to a small proportion;</li> <li>– Where development will result in a significant loss in the quantity of open space or loss of sports pitches, replacement provision will be delivered within accessible walking distance of the site; and</li> <li>– Development of non-designated space will only be permitted where a convincing case is made in justification.</li> </ul>
	<p>DP25 – Nature conservation and enhancement</p> <p>Development on the hierarchy of designated sites, featuring nationally recognised and locally protected sites, shown on the Policies Map will not be permitted. Development located within close proximity to designated sites, or with likely effects on them, should demonstrate that the proposal will not adversely impact on the features of the site that define its value or ecological pathways to the site.</p> <p>Furthermore, proposals should seek to avoid any significant adverse impact on existing biodiversity features. Any potential loss or adverse impact must be mitigated.</p> <p>Developments will be expected to preserve and, wherever possible, enhance existing habitats and ecological quality, including those of water bodies, particularly where located in Biodiversity Opportunity Areas.</p> <p>In all development proposals, existing trees should be retained wherever possible. If retention is demonstrated not to be feasible, replacement provision should be of an</p>

Theme	Policy
	<p>appropriate tree species and maturity and/ or canopy cover considering the tree that is being replaced and the location.</p>
Economy	<p>DP20 – Identified employment areas</p> <p>Development for B-class and industrial sui generis uses will be permitted at these locations where industrial development provides for the compatible operation of different activities within the employment area. Redevelopment will be permitted only where it is clearly shown that significant overriding local economic and job benefits will be achieved.</p> <p>Proposals must be acceptable regarding hours of operation, traffic, noise, fumes, smell, dust, paint or other chemical over-spray, vibration, glare or light spill, electronic interference, or other harmful or nuisance creating material impacts on neighbours or environmental assets.</p>
Heritage	<p>DP12 – Historic Environment Strategy</p> <p>Development should contribute to the conservation and enjoyment of the borough’s historic environment. Where heritage is at risk, landowners will be expected to work proactively to preserve or enhance these assets. Development proposals which may also affect the significance of heritage assets or their setting should demonstrate how these assets will be protected, conserved or enhanced.</p> <p>The policy notes that a heritage assessment should accompany all planning applications affecting heritage assets.</p> <hr/> <p>DP13 – Designated Heritage assets</p> <p>A heritage statement should establish the significance of the heritage asset to enable the assessment the impact of a development proposal. Any harm or loss will require clear and convincing justification.</p> <p>In determining planning applications, the LPA will pay close regard to:</p> <ul style="list-style-type: none"> <li>– The significance of the heritage asset;</li> <li>– The desirability of maintaining and, where possible, enhancing significance; and</li> <li>– The desirability of ensuring viable uses are found for heritage assets, consistent with their conservation.</li> </ul> <p>Where a proposal will lead to substantial harm or total loss of significance, permission will be refused unless it can be</p>

Theme	Policy
	<p>clearly demonstrated that the development is necessary for substantial public benefits to be achieved that will outweigh the harm or loss.</p> <p>Where a proposal will lead to less than substantial harm, this will be weighed against the public benefits of the proposal.</p>

### **Kent Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031**

A.3.76. The Kent Local Transport Plan 4: Delivering Growth with Gridlock was adopted in 2016, and sets out the strategy for transport priorities across Kent, and details of the transport investment required to support the growth.

A.3.77. The Kent Local Transport Plan (LTP) sets out the strategic transport priorities across the county. The relevant priorities are as follows:

- New Lower Thames Crossing – a new lower Thames crossing located to the east of Dartford and Gravesend is required to alleviate pressure on the Dartford Crossing and unlock opportunities for development. Capacity on the Dartford Crossing is overloaded for large periods of the day and it is extremely vulnerable to incidents.

A.3.78. The LTP proposes the following transport improvement measures within the vicinity of the Application Site:

- Improvements/new bridge at A282 Junction 1a;
- Pedestrian/cycle bridge over River Darent at the Northern Gateway Strategic site; and
- Measures to address the impacts of Dartford Crossing traffic on the local road network - the A282 (Dartford Crossing) suffers from congestion at peak times and during traffic incidents.

### **Kent Minerals and Waste Local Plan 2013-30 (2016)**

A.3.79. The Kent Minerals and Waste Local Plan was adopted in 2016. The plan sets out the strategic objectives for the County of Kent’s minerals and waste, and development management policies that the County Council will consider when assessing the planning applications for the period from 2013-2030.

A.3.80. The relevant strategic objectives of the plan for waste include the following:

- *“Promote the management of waste close to the source of production in a sustainable manner”;*
- *“Enable minerals and waste developments to contribute to the social and economic fabric of their communities through employment opportunities”;*



- *“Use waste as a resource to provide opportunities for the generation of renewable energy for use within Kent through energy from waste and technologies such as gasification and aerobic/anaerobic digestion.”*

A.3.81. **Table A3.8** sets out the policies that are relevant:

Table A3.8 Kent Minerals and Waste Local Plan relevant policies

Theme	Policy
Development Management Policies	<p>CSW1 – Sustainable development</p> <p>The Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF, NPPW and the Waste Management Plan for England.</p> <p>Waste development that accords with the development plan should be approved without delay, unless material considerations indicate otherwise.</p>
	<p>Policy CSW 6 (Location of Built Waste Management Facilities)</p> <p>Requires that new waste management facilities avoid Groundwater Source Protection Zone 1 and Flood Zone 3b.</p>
	<p>DM1 – Sustainable Design</p> <p>Proposals for minerals and waste development will be required to demonstrate that they have been designed to:</p> <ul style="list-style-type: none"> <li>– Minimise greenhouse gas emissions and other emissions;</li> <li>– Minimise energy and water consumption and incorporate measures for water recycling and renewable energy technology and design in new facilities where possible;</li> <li>– Maximise the re-use or recycling of materials;</li> <li>– Utilise sustainable drainage systems wherever practicable;</li> <li>– Protect and enhance the character and quality of the site's setting and its biodiversity interests or mitigate and if necessary compensating for any predicted loss; and</li> <li>– Minimise the loss of Best and Most Versatile Agricultural Land.</li> </ul>
	<p>DM2 – Environmental and landscape sites of international, national and local importance</p> <p>Proposals for minerals and/or waste development will be required to ensure that there is no unacceptable adverse impact on the integrity, character, appearance and function,</p>

Theme	Policy
	<p>biodiversity interests, or geological interests of sites of international, national and local importance. This includes local sites (local nature reserves), national sites (Area of Outstanding Natural Beauty (AONB) and international sites (Special Areas of Conservation and Special Protection Areas).</p>
	<p><b>DM5 – Heritage Assets</b></p> <p>Proposals for minerals and waste developments will be required to ensure that Kent's heritage assets and their settings, including locally listed heritage assets, registered historic parks and gardens, Listed Buildings, conservation areas, World Heritage Sites, Scheduled Ancient Monuments, archaeological sites and features and defined heritage coastline are conserved in a manner appropriate to their significance.</p> <p>Proposals should result in no significant adverse impact on Kent's historic environment and, wherever possible, opportunities must be sought to maintain or enhance historic assets.</p>
	<p><b>DM6 – Historic Environment Assessment</b></p> <p>Proposals that are likely to affect important heritage assets will only be granted following: a preliminary historic environment assessment; appropriate provision for preservation in situ; and agreement of mitigation of the impacts on the significance of the heritage assets.</p>
	<p><b>DM7 – Safeguarding mineral resources</b></p> <p>Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding, where it can be demonstrated that either:</p> <ul style="list-style-type: none"> <li>– The mineral is not of economic value or does not exist; or</li> <li>– that extraction of the mineral would not be viable or practicable; or</li> <li>– The mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or</li> <li>– The incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or</li> </ul>

Theme	Policy
	<ul style="list-style-type: none"> <li>– Material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or</li> <li>– It constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions; or</li> <li>– It constitutes development on a site allocated in the adopted development plan.</li> </ul> <p>DM8 – Safeguarding minerals management, transportation production and waste management facilities</p> <p>Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:</p> <ul style="list-style-type: none"> <li>– It constitutes development of the following nature: advertisement applications; reserved matters applications; Minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or</li> <li>– It constitutes development on the site that has been allocated in the adopted development plan; or</li> <li>– Replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or</li> <li>– It is for a temporary period and will not compromise its potential in the future for minerals transportation; or</li> <li>– The facility is not viable or capable of being made viable; or</li> <li>– Material considerations indicate that the need for development overrides the presumption for safeguarding; or</li> <li>– It has been demonstrated that the capacity of the facility to be lost is not required.</li> </ul>

Theme	Policy
	<p>DM9 – Prior extraction of minerals in advance of surface development</p> <p>Planning permission for, or incorporating, mineral extraction in advance of development will be granted where the resources would otherwise be permanently sterilised provided that:</p> <ul style="list-style-type: none"> <li>– The mineral extraction operations are only for a temporary period; and</li> <li>– The proposal will not cause unacceptable adverse impacts to the environment or communities.</li> </ul> <hr/> <p>DM20 – Ancillary Development</p> <p>Proposals for ancillary development within or in close proximity to mineral and waste development will be granted providing:</p> <ul style="list-style-type: none"> <li>– The proposal is necessary to enable the main development to proceed; and,</li> <li>– It has been demonstrated that there are environmental benefits in providing a close link with the existing site that outweigh the environmental impacts.</li> </ul> <hr/> <p>DM21 – Incidental mineral extraction</p> <p>Planning permission for mineral extraction that forms a subordinate and ancillary element of other development will be granted provided that operations are only for a temporary period.</p>
<p>Delivery Strategy for Minerals</p>	<p>CSW3 – Waste reduction</p> <p>All new development should minimise the production of construction, demolition and excavation waste and manage any waste.</p>

### Other relevant local planning policies

A.3.82. **Table A3.9** sets out relevant policies from neighbouring boroughs development plan documents.

Table A3.9 Other relevant local planning policies

Document	Policy
<p>London Borough of Havering (LBH) Core Strategy and Development Control Policies Development Plan Document (2008)</p>	<p>Policy DC52 - Air Quality</p> <p>Describes the measures developments must adopt during construction and occupation in order to achieve higher environmental standards. It states that:</p> <p><i>“Planning permission will only be granted where new development, both singularly or cumulatively, does not cause significant harm to air quality, and does not cause a breach of the targets set in Havering’s Air Quality Management Area Action Plan”.</i></p> <p>The policy requires a formal assessment where development is likely to cause a breach of emission levels for prescribed pollutants and where the assessment confirms a breach, planning permission will only be granted if suitable mitigation measures are put in place through conditions or legal agreement.</p>
	<p>Policy CP18 – Heritage</p> <p><i>“Development affecting sites, buildings, townscapes and landscapes of special architectural, historical or archaeological importance must preserve or enhance their character or appearance. Contributions may be sought towards the preservation or enhancement of historic assets where appropriate.”</i></p>
	<p>DC67 – Buildings of Heritage Interest</p> <p>Development affecting Listed buildings or their setting will only be allowed where it does not involve the demolition of a Listed Building and it does not adversely affect a Listed Building or its setting.</p>
<p>London Borough of Barking and Dagenham (LBBD) Core Strategy (2010)</p>	<p>Policy CR1 - Climate Change and Environmental management</p> <p>Seeks to protect water and air quality from the impacts of development.</p>
	<p>Policy CP2 - Protecting and Promoting our Historic Environment</p>

Document	Policy
	Requires development proposals to respects and historic assets, reinforce local distinctiveness and promote respect for the local historic context.
LBBD Borough Wide Planning Policies Development Plan Document (2011)	<p>Policy BR14 - Air Quality</p> <p>Describes the measures that development must adopt during construction and occupation to achieve higher air quality standards. It states that:</p> <p><i>“Where development is likely to have a significant negative impact on air quality, the Council will request the submission of an air quality impact assessment. The Council will have regard to national air quality strategy objectives and consider whether the development is expected to:</i></p> <ul style="list-style-type: none"> <li><i>– Lead to a breach or worsening of a breach of an EU Limit Value (this can include introduction of new exposure to cause a breach).</i></li> <li><i>– Lead to a breach or worsening of a breach of an Air Quality Objective, or cause a new Air Quality Management Area to be declared.</i></li> <li><i>– Interfere with or prevent the implementation of actions within an Air Quality action plan.</i></li> <li><i>– Interferes with the implementation of a local Air Quality Strategy.</i></li> <li><i>– Leads to an increase in emissions, degradation in air quality or increase in exposure below the level of a breach of an Air Quality Objective.”</i></li> </ul> <p>Policy BP2: Conservation Areas and Listed Buildings</p> <p><i>“Development proposals which affect a listed building or its setting will be expected to demonstrate that any social and economic benefits of the scheme are balanced to ensure the development is in keeping with its significance including its special architectural and historic interest.”</i></p>
Royal Borough of Greenwich (RBG) Local	<p>Policy E(a) – Pollution</p> <p><i>“Planning permission will not normally be granted where a proposed development or change of use</i></p>

Document	Policy
<p>Plan: Core Strategy with Detailed Policies (2014)</p>	<p><i>would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit.</i></p> <p><i>Housing or other sensitive uses will not normally be permitted on sites adjacent to existing problem uses, unless ameliorating measures can reasonably be taken and which can be sought through the imposition of conditions...</i></p> <p>Policy E(c) - Air Pollution states:</p> <p><i>“Development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included. Such planning applications should be accompanied by an assessment of the likely impact of the development on air quality.</i></p> <p><i>All new developments with a floor space greater than 500sqm or residential developments of 10 or more units are required to reduce carbon dioxide (CO2), particulate matter (PM10) and nitrogen dioxide (NO2) emissions from transport through the use of measures such as those set out in DEFRA guidance 'Low Emissions Strategies: using the planning system to reduce transport emissions Good Practice Guidance-January 2010'.</i></p>

**A.3.5. Emerging Local Planning Policy Context**

**Draft Bexley New Local Plan**

A.3.83. The LBB is preparing a new Local Plan which will set out the policies to guide development across the borough up till 2040. LBB is expected to undertake a consultation on the preferred approach to Local Plan policies in January 2019 (the ‘Regulation 18 consultation’). The published draft timetable indicates that the new Local Plan will be adopted by summer 2020.

### **Draft Dartford New Local Plan**

- A.3.84. DBC is in the process of preparing a new local plan. DBC consulted on the 'Dartford New Local Plan Strategic Issues' document between June and July 2018 (the 'Regulation 18 consultation'). The document provides information about the strategic development issues which the new Local Plan will address including housing, economic development, transport, community infrastructure and environmental matters however the document does not set out policies.
- A.3.85. DBC is expected to undertake a consultation on the preferred and alternative options for the development strategy including draft policies in 2019 (the 'Regulation 19 consultation'). The published draft timetable indicates that the new Local Plan will be adopted from late 2020 at the earliest.