



**The Office of Louie French,**  
Member of Parliament for Old Bexley and Sidcup,  
House of Commons,  
London,  
SW1A 0AA

Jonny Hill,  
Senior Planning Manager  
Firstway Energy,  
Foresters Hall,  
25-27 Westow Street,  
London,  
SE193RY

Thursday 20th February 2025

Dear Mr Hill,

I am responding to the public consultation on the two energy storage facilities proposed in Bexley Village and North Cray on behalf of residents.

I am disappointed by how little detail there is as part of this public consultation. However, from what is available, I am deeply concerned that these proposals are unsafe, inappropriate and environmentally damaging.

### **The proposed locations are inappropriate**

The two proposed energy storage facilities near Dartford Road and North Cray Road would be on protected green belt land. This designation reflects the importance of these sites in preserving the setting and special character of Bexley, Coldblow, and North Cray villages and protecting the borough's remaining countryside. According to national planning rules, these proposals amount to inappropriate development on the green belt.

The Dartford Road site provides an important public amenity with two footpaths. The first, south of the proposed site, provides a crucial pedestrian connection from Wansunt Road, Hill Crescent, and Dukes Orchard to Bexley Village. The second, running vertically along the proposed site, is a popular footpath around the green spaces surrounding Coldblow. These footpaths would bring many local residents close to the site on a daily basis. They want clarity on how these plans would preserve and secure these popular and necessary footpaths.

The North Cray Road site is high-quality agricultural land. It is inappropriate to develop energy storage facilities on farming land, especially when the classification of agricultural land is best and most versatile, as I understand it to be on this site. This land should be reserved for food production - not hosting a poorly located energy storage facility.

### **The proposals do not meet fire safety guidance**

Energy storage facilities can be a fire risk, so fire safety is the top concern in residents' minds regarding these two proposals. The Dartford Road site is near residential properties on Wansunt Road, with ancient woodland immediately adjacent to the facility behind the houses. The North Cray Road site is also near residential properties on North Cray Road, Cornell Close and Honeyden Road. There is also ancient woodland nearby in Chalk Wood and Joyden Wood. We saw wildfires in Bexley and nearby in Dartford in recent summers, so ensuring that any fires at the facilities do not spread is critical to residents' safety.

While we await the revised guidance from the National Fire Chiefs Council (NFCC), the 2023 guidance for battery energy storage systems remains in force. This guidance requires sites to have "at least two separate access points to the site to account for opposite wind conditions/direction". Neither proposal meets this requirement. The Dartford Road plans include two access points from Manor Way and Dartford Road. However, while these are separate, they connect on-site, south of the facility, providing only one approach and failing to follow the guidance. The North Cray Road plans only show one access point from the north,

also failing to follow the guidance. This could pose significant challenges to the London Fire Brigade in controlling any fire on these sites, leaving residents feeling unsafe.

### **The proposals are environmentally damaging**

Each proposal claims to provide a biodiversity net gain of 10 per cent, with little information or independent evaluation to support these claims. However, given the fire safety requirements the site must meet, I am particularly doubtful of your biodiversity claim. Guidance from NFCC states that units are separated by 6 metres to allow firefighters unimpeded access and to prevent fire from spreading between units. It also requires that “areas within 10 metres should be cleared of combustible vegetation and any other vegetation on site should be kept in a condition such that they do not increase the risk of fire on-site”. The guidance also says, “areas with wildfire risk or vegetation that would result in significant size fires should be factored into this assessment and additional cleared distances maintained as required”. The facility would be unsafe if your proposals do not meet these requirements.

However, meeting these requirements would make your biodiversity requirements impossible. The Dartford Road location is a Site of Importance to Nature Conservation with nature-rich meadows, scrub and ancient woodland. This vegetation provides a nature-rich habitat for small mammals, but the clearance necessary to ensure the London Fire Brigade (LFB) had access would irrecoverably wreck this nature conservation site. Your proposed facility would also sit directly on a strategic green wildlife corridor throughout the borough. There also appears to be no evaluation from an independent group like the London Wildlife Trust to ensure any mitigations - if you can mitigate such damage - would provide no biodiversity loss and a net gain.

As part of Bexley’s remaining countryside, the North Cray Road site also hosts the same nature-supporting landscape. However, there is still no detail on this location or independent evaluation showing how a biodiversity net gain of 10 per cent is achievable alongside the clearance needed to prevent fires from spreading and allow the LFB access to the site.

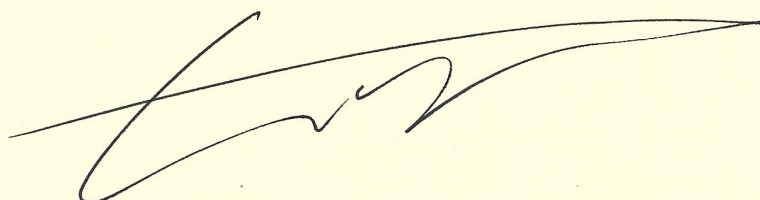
### **Conclusion**

While I appreciate the opportunity to comment on your proposals, I share the same frustration as many nearby residents regarding the lack of details during this public consultation. I firmly believe that you have chosen the wrong locations to build energy storage facilities for the reasons outlined.

I strongly encourage you to consider other sites instead of proposing inappropriate development on the green belt. If you decide to proceed with your proposals and submit formal planning applications, I urge you to follow NFCC guidance, address access point issues, engage with the London Wildlife Trust concerning biodiversity mitigations, and reassure residents on footpaths.

If you proceed, I will review your planning applications in full and may choose to make further representations to Bexley Council’s Planning Committee.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Louie French', written in a cursive style.

**Louie French,  
Member of Parliament for Old Bexley, Sidcup and Welling.**