

Dear Mrs Clark,

Reference 15/02926/OUTM Land Park of Borax Works Norman Road, Belvedere.

Having consulted with the Friends of Crossness Nature Reserve, I am writing to object to some issues with the latest ecology report submitted by Riverside Resource Recovery Limited (Cory Environmental).

Once again, the ecologists have failed to carry out breeding bird surveys at the correct time. This time their visits took place in March and April, with the last visit being on 18th April: before the breeding season was fully underway. As a result of this, they failed to confirm ACTUAL breeding bird activity and were only able to provide details of PROBABLE breeding, thereby completely missing the breeding Ringed Plover that was nesting on the north Borax Field from at least 24th April (see photo below) and never actually witnessing the Skylark and other species that have bred there. It all seems a little convenient.

The report states (in section 3.5) that other suitable foraging habitat exists nearby, as though this makes loss on the Borax fields acceptable, but the point is this is not foraging habitat, but **breeding** habitat. There is NOT suitable breeding habitat for certain species nearby. The only other suitable breeding habitat was the location of the old electric substation on Norman Road, and Bexley Council have deemed it acceptable to build all over that too.

The main concern that the Friends group has, is the implication that because only a small number of breeding birds are supported by the Borax Fields, that the impacts are not significant, and are therefore prime for building on. We, however, would argue the opposite: Skylark breed on only 3 sites within the London Borough of Bexley, one of which is Crossness (on the Borax Fields only) and another is Crayford Marsh, where this is a larger population, but this too is under threat from a separate planning application. So while the population may be small at Crossness, the borough wide impact is enormous. By allowing this development to go ahead, you are in effect leading to the extinction of Skylark and Ringed Plover as breeding species within Bexley. Surely this goes against the Council's own biodiversity policy and biodiversity action plan?

Another concern that the group has is the presence of Nationally Scarce invertebrates. While it has been suggested that the proposed green wall will mitigate the impacts to terrestrial invertebrates, it has suggested that the 44 aquatic invertebrates will not be affected because the ditches will not be directly impacted by the development. However, Dr Peter Kirby, the specialist entomological consultant who carried out the surveys, states that all but one of the 7 Nationally Scarce aquatic species are restricted to water bodies with some degree of salinity. Indeed, on page 32 of Appendix 2, he states that 'The recorded invertebrates...[have] a need for a very particular salinity range.' We would argue that the development, with all of its hardstanding and hard structures, will create a lot of run-off which will be directed into those same ditches, thereby reducing salinity and creating more of a freshwater habitat, which is unsuitable for said scarce brackish invertebrates.

In light of the many comments and objections received concerning biodiversity impacts linked to this development, we are somewhat dismayed that there is still no promise of a green roof to mitigate the impacts. Their statement in Section 3.13 that 'an exploration at the detailed design stage of the selective incorporation of green roofs as a further means of biodiversity enhancement' is just not good enough. Why will the applicant not commit to a green roof at this stage? Why will Bexley Council not insist upon one? You will have to excuse our scepticism and belief that this is merely a throwaway comment with which to achieve outline planning consent, and then there will later be some reason found – probably an economic one – as to why they couldn't incorporate said mitigation after all.

For LB Bexley to fulfil its NERC Act duties, we believe that you must insist on a green roof suitable for breeding Skylark at outline application stage. We also think that Bexley Council should request a brown roof be incorporated into the second building in an attempt to offset Ringed and Little Ringed Plover losses. We would argue that the provision of green and brown roofs would not only offset some of the breeding bird impacts, but it would also go some way to controlling the run-off that will reduce the salinity of the adjacent ditches.

We would go further and insist Bexley Council demand that 'compensatory' habitat be found elsewhere in the Borough on the grounds the applicant won't at this stage commit to adequate "on-site mitigation" in terms of any/enough green/brown roofs. They say themselves, the "undeveloped perimeter left will be suitable for certain flora/aquatic invertebrates/birds (they don't specify any) but at no stage do they ever attempt to make any claim that the three species of greatest concern will be mitigated for. Any such compensatory land must obviously be of extremely low existing wildlife value so as to deliver no net loss of local biodiversity.

The developer is trying to emphasise the line between the LNR and the Borax fields and even suggesting that there is confusion about the ecological status of the fields in question. There is no confusion amongst us. We are fully aware the site in question is not part of the Crossness LNR but, as you would expect, being located immediately next to a much-loved nature reserve, the Friends group is particularly concerned with the ecological impacts of this proposal. What we are saying is that nature/wildlife doesn't recognise their "line" and that Erith Marshes are not just the MSINC. Whilst some specific species (e.g. skylark, ringed and little ringed plover) favour specific habitats the overall impact on the LNR will be detrimentally affected if these and other species are lost from Erith Marshes altogether as a result of the application. The status of the Crossness LNR as one of London and the South East's premier wildlife sites on a scientific level (LNR designation by Bexley Council) will be eroded and of course, the birds are visible from the LNR so their loss would also be a very tangible loss of amenity to those in the community who like to see and hear them.

Finally, the fact remains that the height of these proposed buildings is completely inappropriate for the location. It is completely inappropriate to have such large, dominating buildings at such a location. Marshes should be flat, low-lying, with long views and big skies, and have a sense of remoteness and wilderness. The proposed development would further erode the landscape character of what remains of the Erith Marshes and so size and materials must be taken into consideration.

We trust that you will take these comments into consideration when considering this planning application further.

Kind regards

Ralph Todd
On behalf of the Friends of Crossness Nature Reserve



Ringed Plover on nest, Cory Field North, 24th April 2016 (J. Tolliday)



Ringed Plover on nest, Cory Field North, 26th April 2016 (D. Zimmer)



Ringed Plover on nest, Cory Field North, 26th April 2016 (D. Zimmer)