

Submission regarding planning application 17/00577/OUTM.

Old Farm Park East.

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ON BEHALF OF BEXLEY NATURAL ENVIRONMENT FORUM – the umbrella body for Friends of Parks and Open Spaces groups, local wildlife experts and conservationists and sustainability campaigners in the Borough. We work to protect, restore and enhance habitats and biodiversity across Bexley.

1) We re-iterate our objection to the selling off of public open space, Bexley Council's shameful rejection of the results of its own 'con'sultations on the same and its unacceptably high new housing targets which go way beyond what was agreed in the Core Strategy following an examination in public.

2) We note that London Wildlife Trust recommended that the Sidcup Rail Linesides SINC be extended into Old Farm Park to include the copses of trees only relatively recently planted by Bexley Council in conjunction with other groups and that four of these are now slated to be grubbed out. Bexley Council conducted a review of SINC's in 2013, only got round to formally adopting it in 2017 and has in the meantime proceeded on the basis that developers telling it that substantial parts of these sites are not really worth protecting after all are right and that LWT (which it hired to do the work) and local people (who footed the bill) are wrong.

Bexley Council – 'Listening to who?'

3) Planning statement

'Sustainability 7.40 The proposal will be built in accordance with building regulations standards for development in accordance with both the Local and London Plan policy.'

is woefully unambitious. Bexley Council wishes to ram thousands of extra dwellings into the Borough and laughably calls this 'Visionary', but it has clearly lost sight of the fact that even to maintain the Borough's ecological footprint at its current level will then necessarily require significant cuts elsewhere, and that's without the need for a two thirds reduction in UK resource use overall in order to achieve true sustainability. The Core Strategy committed Bexley to identifying sites for zero carbon 'development'. Where are they? We propose this should be one of them and that all dwellings should be built to Pasivhaus standards.

4) For a site close to a railway station and several main bus routes, the amount of car parking at 121 car spaces spaces is excessive. Rough and ready measurements from the sketch of the proposed housing scheme give approximately 2,533 square mm of parking on a site with a total sketch area of 15,848 sq mm. That is 16%, or close to one sixth of the total land area being dedicated to parking. Now put that into the context of Bexley's plans for 22,000 more homes in the Borough and wake up to the fact that cars are a serious land use issue.

5) 'Ecology Solutions' claims in its report at 2.9. That *'The lighting scheme associated with the development proposals will be designed sensitively such that the BxBII site will, as much as possible, remain unlit. Habitats within the BxBII site should not be subject to direct illumination or excessive light spillage and ambient light from the development footprint will*

not be at a (lux) level which is likely to give rise to any adverse effects on its value as a green corridor. Notwithstanding this, the lighting strategy will include measures such as hoods / cowls (wherever applicable) in order to direct lighting to where it is needed and below the horizontal plane. Further, the lowest possible lighting levels will be used, striking the balance between public safety and ecological sensitivity. 5.2.10. As discussed further below in relation to Bats, the lighting strategy will be designed with ecological sensitivities in mind to ensure that dark corridors are created, wherever possible, as part of the development proposals and the wider area.'

This needs to be the case. BNEF has previously pointed out to the Council, in connection with the night-lighting 'consultation' that spectrum (wavelength) is important and not just the total illuminance. Given that the Councillor responsible was incapable of answering the straightforward question as to whether biodiversity was being taken into account in regard to the night-lighting plans, or whether he was going to act on any of BNEF's proposals on this matter, we have serious concerns about the Council's ability to get this right.

6) There appears to be an important and worrying divergence between the 'landscaping' /planting that 'Ecology Solutions' says will be implemented, and the prettified offering from the 'landscape architects'. The former says:

Habitats 5.4.4. A number of habitats are present including grassland, trees and hedgerows. These features will be retained and enhanced where appropriate. Further new habitats are also proposed to be created. Grassland 5.4.5. This habitat will be enhanced through over-sowing and the implementation of sympathetic management regime. 5.4.6. The existing grassland habitats will be over-sown with a suitable meadow grassland seed mix (such as Emorsgate EM2) to increase the floristic diversity of the sward. 5.4.7. In order to balance the ecological enhancements with a requirement for recreational use part of the grassland will be managed as an amenity space, with the remainder managed as meadow grassland. 5.4.8. 40% of the grassland (to include the central area) will be mown on a regular basis, maintaining a relatively short sward height. 5.4.9. Other grassland, towards the boundary will be managed to promote species diversity and increase its value to faunal species (e.g. common reptiles). Management will be based around a single cut in late summer / early autumn.

which essentially augments existing 'natural' vegetation in a reasonable way with other native species, which BNEF can support, but this is seemingly contradicted by the 'alluring' imagery of the 'landscape architects'. It is not clear from the latter offering whether the non-native flowers are being planted all round the margin, or (as seems to be indicated by the axonometric view) as 'ladder rungs' between a natural 'buffer' round the outside of the site, or whether such planting is the same as the 'meadow planting' in their artwork, which also appears to be around the margin. In any case it seems to simplistically equate lots of bright flowers with biodiversity benefit. Whilst we are not intrinsically averse to some 'new wave' perennial planting of the Piet Oudolf school we think that this will require considerable ongoing management. Many of the suggested species and cultivars would not be suitable for planting into 'meadow' grassland. Moreover some of the plants proposed are poor for wildlife (e.g. *Liriope muscari*) and also, as in the case of species *pelargoniums*, downright bizarre choices, since although they may come through some modern ultra-mild winters in a very sheltered spot, they are not really hardy. Throw in the ignorant nonsense of the Harvest Mouse picture and you are left with the impression that this is a disconnected exercise designed to 'sell' a product and not to enhance wildlife, possibly spending unnecessary amounts of money largely in a bid to 'justify' flogging off the other half of the park.

In our view any such amenity planting should be limited to the 'ladder rungs' or concentrated up near the new housing, with margins of long grass round the rest of the park, perhaps with some additional natives planted within this.

Enhancing biodiversity is not just about flowers for pollinators, but biomass (food) and structure for grass-feeding butterfly and moth caterpillars, and grasshoppers (all needing native grasses to eat), nesting sites for pollinators, cover for Hedgehogs (recorded in the adjacent Old Farm allotment site) and other small mammals and so on. The native route will cost less and need less maintenance.

'Ecology Solutions' said 4.6.1. *The Site is adjacent to Sidcup Line Railsides which has been noted to support reptiles. However, the habitats present within the Site are considered to offer sub-optimal opportunities for reptile species, on account of regular management and the short sward throughout the vast majority of the grassland.* Slow Worms are known to occur on the adjoining allotment site. What is needed, therefore, is sympathetic management of native vegetation. The kind of planting implied by the landscape architect documents will not produce suitable habitat for our declining reptiles, which need to be catered for given the recent run of attacks by developers on key sites for them elsewhere in the Borough, and which have all been supported by this Council.

'Ecology Solutions' says 5.4.11. *'Scrub planting (native species) will be delivered at the boundaries in order to increase habitat diversity and provide increased (e.g foraging and shelter) opportunities for reptiles and birds. Keeping such planting to the boundaries will alleviate concerns regarding public safety in an area which is to be promoted for recreational use.'* Meanwhile the 'landscape architects' are at odds with this, indicating a lifting of crowns of trees at the site margins and cutting back 'overgrown shrubs' underneath to 'allow access' which again smacks of a fixation with interference, excessive 'management' and 'tidiness' and not a concern for existing wildlife habitat.

The words 'Ducks' and 'in a row' come to mind on all this.

7). We do welcome and strongly support the inclusion of a pond in the proposals, which will produce local biodiversity benefits, and agree that the western extremity is broadly the right place for it. However, the landscape architect diagrams show this overhung by a tree canopy. We advise that siting it in an open area for more sun and avoidance of too much leaf litter would be more sensible, but that corridors of uncut native vegetation reaching to the site margins will need to be retained or provided. The axonometric view suggests that it will be too cut off from surrounding cover by hard-surface pathways and heavily mown grass.

8) We support what appears to be the retention within the 'development' of the existing hedgerow by the gardens at the east end of the site.

9) If outline permission is given we would wish to see conditions that:

- require a zero carbon development
- significantly reduce the amount and proportion of land wasted on car parking
- apply stringent controls on exterior lighting that also take into account spectrum (wavelength) impacts on wildlife
- put the emphasis on uncut/sympathetically managed native vegetation in the west (remaining) part of the park instead of a predominance of the suggested exotics, some of which are of dubious wildlife value and others of which are not even hardy

ENDS