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**Bexley Natural Environment Forum submission reference 17/02745/FULM.
Former Council offices site, Bexleyheath.**

General

BNEF welcomes the fact that a number of environmental considerations will be acted upon within this development, in particular the promise of 'living roofs'. We are disappointed by the extent of car parking provision, failure to get to zero carbon, the amount of hard surfacing, number of trees to be removed and the rather strange and limited planting palette around which a rather dubious claim of biodiversity benefit is being made.

Energy

When will Bexley make a shift to zero carbon buildings? It promised to identify a site for such developments in the Core strategy process way back in 2011. As far as we are aware no such site has been identified and there is not one such building in the Borough. Paying for an 'offset' simply passes the buck somewhere else at a time when we still need big net cuts in emissions. Non zero-carbon developments will continue to provide an anchor drag into the future on our ability to get emissions down.

We are interested to see what mechanisms are used and what projects are going to be implemented by Bexley to ensure that the £675K promised is spent on serious energy-saving measures elsewhere. We suggest that this sum of money could be used to build a couple of zero-carbon/Passivhaus 'demonstrator' units within the Borough.

We support the provision of solar PV on block roofs, but wonder how much space will be left for living roof-scapes for wildlife once these and the proposed decking have been installed.

Lighting

We welcome the commitment to efficient and well-directed lighting. Avoiding undue light pollution needs to factor in light spillage from within the buildings and any usage of the roofs after dark.

Transport

By the applicant's own admission, the site is very well connected by public transport. The attitude to car use has not got beyond the schizophrenic stage, however, with warm words about sustainable transport being contradicted by the following:

<http://www.bellway.co.uk/new-homes/thames-gateway/eastside-quarter>

'Commuters travelling into central London will find Eastside Quarter ideally situated for accessing major roads and public transport routes into the capital. The nearest railway stations are Bexleyheath and Barnehurst, both less than 10 minutes away by car, with regular services calling at Blackheath, Lewisham, London Cannon Street and London Victoria.

The A2 lies within a few minutes' drive of the development, and the A205 South Circular Road and the M25 are both around 10 minutes' drive away, opening up further local, regional and national connections.'

AND

'For even greater choice, Bluewater at Greenhithe with its 300 shops, a 13-screen cinema, and numerous bars and restaurants can be reached in less than 15 minutes by car,'

The 'direction of travel' set out in the 'growth strategy' recognises the negative land-use consequences of current levels of car ownership and use. Even where car parking is buried under buildings, parking space will still be required at multiple destinations. Barnehurst station, for example, is already in a CPZ, so encouraging more parking around there is unhelpful. The developer should promote cycling to Barnehurst or Bexleyheath stations, or even Bexley station, for journeys further afield, rather than driving. With sites like this, Bexley Council should be pushing for car-free or very limited parking provision.

The likely carbon emissions from cars using the site should be factored into the calculation of how far this scheme is from being zero carbon/neutral, and the payment to the Council adjusted accordingly.

Water

We are pleased to see that the target usage pushes marginally below the building regs figures, but given London was due to go into water deficit from 2016 (according to the GLA – a date which seems to have been revised slightly) – the toughest possible level needs to be applied from hereon in.

Run-off and grey water for any irrigation of the plantings.

Other resources

We welcome the attention given to sourcing of construction materials. However, the question should be asked as to whether more retail takes us towards, or further away, from the UK's Aichi commitment to reduce its resource consumption to sustainable levels by 2020, or further way from that. We suggest the latter.

Trees (existing)

When the Tesco scheme died, Council officers assured us in writing that they would seek to protect the London Plane trees on the northern border of the site against any future planning application. Five of seven are now to be given the chop. We accept they are not of the greatest wildlife value, but never-the-less they are identified in the tree report as having long term potential, even if some thinning would be advisable in the future, and we believe there should be more large, old trees in the built-up area, a status these would achieve sooner than any newer plantings. The Sycamore group helps hide the ugliness of the multi-storey car park and is a species that provides a good yield of aphids for insect-feeders.

Biodiversity

- i) **Living roofs.** We hope that more than a token amount of space will be left for wildlife on these (see above) and would prefer them to be left to colonise naturally, rather than taking a probably more water-hungry 'gardened' approach.

- Any 'interventionist' watering should use solar-pumped stored run-off or grey water.
- ii) **Planting approach.** We believe the claim ('Planning statement' 3.42) that the planting will increase the amount of biodiversity to be over-blown and false. We would expect the existing 'brownfield' to be more valuable. The ecology survey report (p5) recommends using native species of local provenance. What we are offered here is instead a preponderance of non-natives set in far too much sterile hard surfacing. The 'ecology survey' was too much of a standard box-ticking exercise. The prospects of finding any reptiles were miniscule. It would have been far more sensible and illuminating to have identified the invertebrate fauna utilising the site, which exercise could have then informed the living roof planning.
 - iii) **Trees.** None of the species listed for use are native. More attention should be given to provision of pollen, fruits and types whose leaves are eaten by locally-occurring birds and invertebrates.
 - iv) **Ground flora.** We cannot understand how only 4 of 9 proposed species (and none of the trees) being native equates to the 'predominantly indigenous' planting claimed. We find the species mix rather bizarre— a few native ancient woodland ground flora plants (with no statement as to sourcing), plus a handful of sun-loving exotics, not one of which will deliver much biodiversity. If you are going to use the gardening approach you may as well use a better selection which, we suggest, could include Hawthorn as hedging/defensive planting, Pyracantha, native Privet, Lavender, Asters (other than novi-belgii), hardy Geraniums, Lavender and Marjoram.
 - v) **Bird boxes.** We recommend built-in Swift nest boxes so they don't get removed. Swifts are known to have nested in man-made boxes in nearby Chieveley Rd., and there are a number of nests in houses on Northall Road, Barnehurst Av. and others leading off of these. It should be borne in mind that a clear drop of 5m and probably the playing of tape lures will be needed to have a chance of success. The failure to do either in regard to the Swift nestboxes installed on the new Council offices no doubt accounts for the lack of use there. Please take advice from <http://www.swift-conservation.org/>
 - vi) **Catering for other important local wildlife.** It must be noted that there is a (fairly) long-term House Sparrow roost in the hedge next to the west entrance ground-level entrance to the Albion Rd multi-storey carpark. Disturbance should be minimised whenever construction is underway, not just during the breeding season. Some bright spark sanctioned the hacking down of the other roost 'hedge' behind the Family Court. This is a species that has declined seriously both nationally and in London and Bexley Council should be trying to boost and not reduce numbers. To that end we come back to the planting plan, which should include habitat such as Hawthorn hedging and rough and ready areas to provide weed seed and insect food for Sparrows. Wild Roses, for example, would provide a valuable aphid food supply.

ENDS

Chris Rose. Vice-chair, BNEF.