

From: BEXLEY NATURAL ENVIRONMENT FORUM

To: Development Control, Bexley Council.

Comments regarding application 18/01129/FULM 27/6/18.

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- 1) BNEF continues to regard development here within the previously built upon footprint as acceptable, notes the moderate height of the proposed new structures, and welcomes the fact that they will be set further back from the edge of the river than in the previous application. As usual we support minimisation of the resource footprint and the application of the highest energy- and water saving conditions.
- 2) As with the previous application for this site, we again object to the loss of SINC land, and the biodiversity value of such land in the Borough as would result from the creation of the all-weather hockey pitch (no value) and cricket pitch (reduced and poor value). This has to be seen in the context of the approval of damaging developments to a number of other SINC's across the Bexley, and of high-value wildlife land next to them that has been proposed for inclusion within their boundaries, in recent years, including Erith Quarry, Crossness Nature Reserve, Crayford Rough and Crayford Agricultural and Landfill (albeit the latter currently subject to a public inquiry) and now the proposals in the Bexley 'Growth Strategy' to significantly damage two more SINC's in the Borough. To our mind there has not been adequate compensation for any of this, and any open land, particularly within a SMINC as here, ought to be a target for habitat improvements, not effective habitat size reduction.
- 3) We also note that the applicant intends to arrange fencing such that retained meadow outside of the sports pitch boundaries will be available for use by residents (and possibly dogs). This appears, from the document 'Site Location Zone 1' to take up much of this area, creating a degree of trampling and other disturbance impacts that in our view could easily undermine the otherwise positive and sensible habitat management proposals put forward by the applicant's ecological advisers.
- 4) The net result would be that very little meadow that was not open to disturbance, or not detrimentally modified, would remain here. It is not clear to us that the mitigation proposals, whilst welcome in their own right, would be sufficient to offset this and so the application is contrary to Core Strategy/LDF policy CS18 with regard to protection of SINC's and the protection and enhancement of biodiversity.
- 5) We have recorded, and are aware of Water Vole sightings on the Cray from Thames Road to at least as far upriver as the Seven Stars public house at Foots Cray. Our recorders have not had time to submit these, or thousands of other Bexley wildlife records to GiGL, not least because of the amount of time they have had to spend over the last 4 years trying to fight off a succession of hostile planning attacks on Bexley SINC's. It is our belief that even if there are no Water Vole burrows in the banks at the application site, that this stretch of the river is used by Water Voles as a transit route, and residents at the sheltered accommodation on the opposite bank have told us that they have seen Water Voles here.

- 6) We do not consider the wooded, shaded, river corridor upstream and downstream from the site to be at all ideal for reptile dispersal, so as to deliver real-world habitat connectivity except, perhaps, for Grass Snakes. Instead, habitat continuity needs to be maintained to the railway embankment, and around the north side of the fishing lake to Upper College Farm.
- 7) We support Ecological Appraisal 2018 document 3.8 in regard to lighting and Bats, but as we have repeatedly pointed out to Bexley Council in connection with other schemes and its own street lighting, lighting with Bat-friendly spectra should be used in conjunction with measures to minimise light spillage. We have yet to see any evidence that this has been acted upon anywhere.
- 8) We broadly support the recommendations in 3.9, noting that the 5m Water Vole buffer proposed conforms to the conditions set for other Bexley developments, and the willingness to install bird nest sites on the new buildings. Encouragement of House Martins is particularly important given that we believe there to be only 3 active nesting areas in the whole Borough, that this site is in theory suitable and that we are aware of two historic nesting sites in the vicinity (Hartford Road, North Glade). The reality, however, is that the 'sanitisation' of much of the meadow area through sports pitch construction would be likely to reduce the biomass of available insect prey in the immediate area.
- 9) We do not see the need for the planting of emergent vegetation here, as much of the nearby riverbank is well vegetated already, and natural colonisation is to be expected. If existing bricked up parts of the bank are to be restored to a natural condition, that would be a different matter, and the provision of willow spiling to trap silt and enable said colonisation might be the way forward. This would save resources and cut out the possibility of accidental introduction of non-native species, or use of natives from non-local seed sources.
- 10) We congratulate the applicant on its written promise not to carry out any reptile movement / translocations until after any consent is given and appropriate conditions are set. We contrast this with the situation at Erith Quarry and Crayford marshes, where the landowners arrogantly fenced out and removed animals even before the relevant planning meetings, reducing the ecological value of the land and prejudicing the outcome of any future applications on it were the initial one to fail. We would like to see Bexley Council actively persuading other developers to act in the same responsible and respectful fashion towards our wildlife.
- 11) We are disappointed to note that pressure has previously come from the Council (Supporting Statement Rev A, page 8 point xi)) for more parking space, apparently in relation to the sporting provision. According to the contents of the 'Growth Strategy', the Council has finally woken up to the land use implications of motor vehicles and their use, and appears to recognise the need to reduce traffic. Once again we have a location very close to a railway station and several key bus routes, but also in a congested area with traffic bottlenecks. The Council should be looking to encourage car-free developments / minimal car-dependency applications at such sites.
- 12) We are pleased to see that footpath and river bridge proposals that would have opened up a much wider area to human disturbance, and possibly littering and night-time anti-social behaviour, have not resurfaced in this application.

ENDS