

Mrs Claire Brew
London Borough of Bromley
Bromley Civic Centre Stockwell Close
Bromley
Kent
BR1 3UH

Our ref: SL/2019/119762/03-L01
Your ref: 19/04644/FULL1
Date: 10 March 2020

Dear Mrs Claire Brew

Erection of a covered full-size football pitch, creation of an artificial full-size pitch with floodlighting, and regrading of the site to create a full-size show pitch with spectator seating & six training pitches (two full-size, two 3/4 size & two half-size). External alterations and lobby & link extensions to the existing buildings. Installation of maintenance/store sheds, water tanks and under-pitch infrastructure. Associated highway and landscaping works.

**National Westminster Bank Sports Ground Copers Cope Road
Beckenham BR3 1NZ**

Environment Agency position

We thank the applicant for the additional information that support a net biodiversity gain for the site. We acknowledge the proposed planting of non-native as well as native trees to help our ecosystem adapt with climate change (As supported by the forestry commission). We do however **maintain our objection** for reasons described below:

Proposed location of tree planting

It would seem from the submitted proposals that it is proposed to plant more trees within existing woodland identified as *Biodiversity enhancement area 1* within Arboricultural Statement dated 3rd March 2020.

In the first instance we would request clarification as to the location of the proposed 48 trees to be planted in this area. We would strongly urge the applicant to address other areas within the curtilage of the proposed scheme to add greater connectivity, such as the northern corner. We would like to make the applicant aware that planting by a watercourse should be balanced in order to achieve areas of shade and light whilst still ensuring habitat connectivity. Therefore it has not been demonstrated if the proposed planting will have a potential detrimental impact upon the river environment.

In addition, we request confirmation of the proposed tree planting given that *Biodiversity enhancement area 1* partly falls within the designated area for flood compensatory storage and thus may conflict with the proposed function of the area which is to be design to be at a certain ground level and free from any structures including vegetation.

Assessment of the impact of the proposal on the River Pool

With reference to the submitted Arboricultural Statement, it has not addressed how parts of the Pool River could be enhanced to achieve biodiversity net gain and more importantly the current and proposed baseline value of the river at this location. Overall net gain should, where applicable, include enhancements to the aquatic ecology as well as to the terrestrial ecology.

Furthermore, there is potential for the proposed development to have a detrimental impact on the aquatic ecology at this location. As described above from the proposed planting of trees within close proximity to the river but also possibility of increased eutrophication from managing the training pitches with surface water run-off flowing directly into the river. The submitted Preliminary Ecological Appraisal (PEA) page 27 refers to the potential impact on the river:

'There are five non-statutory designated sites within 1 km of the site boundary, all of which are sites important for nature conservation (SINCs). The nearest is the river Pool, which is on the eastern boundary of the site. The development may impact this with the potential to change the nature of the river on site, by removal of trees and scrub, the possibility of increased eutrophication due to management practices, as there are additional sports pitches proposed, or by allowing light spill onto the river corridor.'

Given the presence of the 'River Pool at New Beckenham', a Site of Importance for Nature Conservation, we would request that the appropriate level of protection provided from this designated site and that is adequately assessed. Please note for example London Plan policy '**Policy 7.19 Biodiversity and access to nature**' refers to the protection of SINC's which goes on to state '*The indirect impacts of development (eg noise, shading, lighting etc) need to be considered alongside direct impacts (eg habitat loss). New development should improve existing or create new habitats or use design (green roofs, living walls) to enhance biodiversity and provide for its on-going management.*

Any potential loss of biodiversity from the propose development should consider not only the terrestrial but the aquatic environment. As mentioned above the recent submitted information does not provide any commentary on the current and potential biodiversity value of the river consider the proposed development may potentially impact on this environment as described in the submitted PEA by RSK. For example, within the summary of calculations, habitat group 'Rivers and lakes' has a zero existing baseline value, which especially given its designated site status would seem to be incorrect. Enhancements to include naturalisation of the bank where the bank has been engineered deflectors, introduction of gravels, creation of low flow channel.

Overcoming our objection

We first request confirmation of the location of the proposed 48 trees that are to be planted in 'Biodiversity enhancement area 1'. We would strongly urge to seek other areas within the curtilage of the proposed scheme to add greater connectivity, such as

the northern corner but also avoid a potential increase in shading by additional trees adjacent to the river in an already wooded area.

Secondly, depending on the findings of the appropriate assessment of the current and potential impact of the proposed on the river and aquatic ecology we would expect appropriate mitigation to follow that specifically address the specific loss of biodiversity/habitat of the river. As within previous response we have made some recommendations as to what can be achieved. Specifically, enhancements to include naturalisation of the bank where the bank has been engineered, deflectors, introduction of gravels, creation of low flow channel etc should be explored.

We would accept some of these measures and their design, if proposed, to be agreed through condition, such as any in-channel enhancements. However, we would request that at this stage the impact of the proposed development must be identified in the first instance, especially given the presence of the non-statutory designated site and the level of protection it requires as outlined within planning policy.

Yours sincerely,

Mr Ajit Gill
Planning Specialist

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