



Ecology Comments (Came through Friday)

Reviewed documents:

- Preliminary Ecological Assessment (PEA)
- Outline Construction and Management Plan (CMP)
- Proposed Drawings
- Landscape Design Statement

After reviewing the above documents, I have the following comments:

1. The PEA complies with requirements of best practice and the Lewisham Biodiversity Planning Guidance.
2. Due to the current limited biodiversity value of the site there is potential to improve the site and deliver net gain for biodiversity.
3. Bats and breeding birds are legally protected (e.g. Wildlife and Countryside Act 1981, Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) and it is an offence to deliberately kill, injure, disturb or capture them. Demolition could affect a bat roost (or nesting birds) in a building and two buildings were identified to have low potential for supporting bat roosts. Further surveys were recommended by the PEA. These surveys have not yet been conducted or provided with the application, therefore we cannot *“fully assess the potential effects of the proposals on protected species”*. Relevant quote from the ecology report: *“Further ecological survey work will need to be undertaken prior to the determination of any planning application in order to allow the Local Planning Authority to fully assess the potential effects of the proposals on protected species. At this stage, it is therefore not possible to confirm that the proposals for the site meet the requirements of NPPF and London Borough of Lewisham (refer to Section 2.0). The full detail of mitigation measures cannot be established without the results of more detailed survey work. The more detailed survey work recommended for the site are bat emergence/re-entry surveys (Paragraph 5.5.2)”*
4. Sydenham is one of the hotspots for bats in Lewisham ([see appendix 3 of BAP](#)) so bats in this area need to be properly considered.
5. CMP: The outline CMP does not even mention biodiversity or any provisions on how to avoid impact on wildlife during construction.
6. In general, the proposed plans do not seem to maximise opportunities to improve the site by soft landscaping at ground level as the majority of the site is proposed to be built on or covered with hardstanding (e.g. parking spaces). There is also a discrepancy between the proposed drawings and landscape design drawings at ground level. The former proposes 5 parking spaces and 5 new trees, while the latter (3.1.1) only 2 parking places and 6 trees.
7. Living roofs, wildlife friendly planting and podium level landscaping are welcomed in principle. However none of these will be publicly accessible. GR2, point I of the emerging local plan (Reg 19 version) requires that *“Development proposals, should maximise opportunities to introduce new publicly accessible open space, giving priority to green space, as well as improve connections to existing or planned new open spaces, particularly in areas of open space deficiency. Major developments must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions may be required.”* The site is located in an area of deficiency to open space (>2 and >20 ha) and it is a major development therefore publicly accessible open space must be incorporated in the development.
8. The UGF mentions living roofs but there are no further details provided. It is unclear if the UGF calculation considered a biosolar system or the size of the proposed living roof will be reduced due to PV panel installation on the roof in which case the UGF needs to be recalculated.

Relevant policies:

Wildlife and Countryside Act 1981 (as amended)

Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

Protected species standing advice

[Lewisham Biodiversity Planning Guidance](#)

[Lewisham Biodiversity Action Plan](#)

NPPF 2021

London Plan 2021

Environment Act 2021

Regulation 19 version of Lewisham Local Plan

Recommendation:

objection

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