

Damage to Nature and Effect on Local Ecology of Proposed Tooting Triangle Development.

COM/3263104

Statement of Case: Leonie Noble Objection

1.Introduction

Tooting Bec Common is a site of Importance for Nature Conservation (SINC)

This Northern part of the common is unmanicured grassland partly wooded, with a wild feel to it. There are no ornamental features, flower beds or cafes and the only buildings on this site are the unobtrusive Boxing Club and former children's nursery which are screened by trees and bushes on the North and East sides. Adjacent to these is the children's playground, also surrounded by shrubbery and some hedge. The whole area can become waterlogged and floods once or twice a year, a situation that has become worse due to heavier and more concentrated rainfall in spring and winter.

It is quiet and open and prized by local users for its tranquil atmosphere as a place to exercise and connect with nature.

2. Biodiversity Net Gain -broad points

An impact assessment on BNG and local Nature Recovery Strategies was published in late 2019 and enacted in the Environment Act in November 2021. Natural England's Planning Advisory Service to London Boroughs states:

[“Net gain is an approach to development and or land management, that aims to leave the natural environment in a measurably better state than it was beforehand”](#)

The Town and Country Planning Act will be amended to incorporate this law in 2023. However, this concept is already familiar to councils due to the existing requirement in the National Planning Policy Framework. These provisions warrant consideration ahead of time-even while the Act is not in force, local planning authorities and examining authorities are likely to consider the position on biodiversity net gain.

3.Trees and vegetation

Trees on the North side

Here four trees and a “group” (amounting to seven trees in total) are to be felled on the North side of the Boxing club to allow for two small extensions to the building. They are are classed as fair condition, semi mature and ivy covered and comprise a mix of hawthorn, birch and sycamore. These established trees and thick ivy covering are supporting a diverse mixture of bird and insect life and provide shade, nesting areas and leaf canopy. Birdsong is always noticeable at the entrance to the pathway here.The Arboricultural Report drawings and notes seem to omit a sizeable tree next

to the gate onto the path to the Boxing Club -unless it is lumped in with Group 2 This tree contains a large nest (seen in 2021) although the applicant says

“None of the trees is of adequate shape or growth habit to support nesting birds nor do they contribute to the biodiversity of the wider Common in any significant way.”

The trees marked for removal are heavily ivy clad. Ivy is a rich food source for birds, including moths, all kinds of pollinator insects and a popular location for nests which are hard to see in the thick foliage.

The photograph below shows the group of trees due to be removed



Their replacement will be a 45 metre long hedge controlled in shape, the entire strip of land having first been treated with herbicide. Earlier this month Network Rail completely denuded the whole length of the railway embankment wall opposite the site of all the vegetation growing there, cut down young trees at the top and poisoned the stumps.(A maintenance procedure) With this devastation due to occur every ten years or so it is doubly important to preserve all the established tree and shrub growth on the opposite side of the North pathway for its value in maintaining the existing forage areas and habitat for wild life.

See also photo on page 5.

Trees by the pitch:

Four well shaped, semi mature oak trees and two aspens on the East perimeter of the old pitch will have their branches lopped off to a height of 5.0 metres above ground level and be pruned to accommodate the new fencing and light posts. A further four trees on the North side are to have the lower branches amputated to 3.5 metres above ground level and be pruned.

The result: - seven active trees gone, ten well grown trees severely reduced by pruning. Foliage lost, roots affected and weakened.

Proposed mitigation: a five foot high hedge and eight oak saplings planted to the East and South East of the pitch. Saplings planted on the common have a high rate of dying due to droughts and an inability by Enable's contractors to water them adequately. In 2019/2020 up to eleven saplings died in this vicinity. (On Woodfield and the stretch of Common next to Emmanuel Road) Additionally, saplings take many years to mature and replace the benefits of grown trees in terms of carbon sequestration, shade and cooling and providing species habitat.

A hedge provides no shade or canopy.



The group of oaks that will have branches cut off to a height of 5.0 m (16 ft) This is a popular picnicking spot in the summer while people play around on all sides of the trees.

4.Light Pollution

The eight existing floodlights around the pitch are switched on very infrequently, probably no more than once a week September to March, amounting to something in the region of 42 hours a year. The proposed nine new LED lights will be off from mid May to mid September, leaving eight months of the year when they will be switched on for five hours, seven evenings a week. This represents a **huge increase** in light emissions during the hours of darkness at this site.

The effects of the lit up refurbished sports building with its two sets of large glass doors is not included anywhere in the planning application reports but will nevertheless alter the current state of the area with yet more light spillage during the dark evenings. The pitch lights are specified as LED 4000 Kelvin.

5 LED lights ,insect decline and moths:

Researchers in a UK study (August 2021) found evidence to show that artificial street lights were found to disrupt the behaviour of nocturnal moths, reducing caterpillar numbers by half and that LED streetlights appeared to have the biggest impact. Separate research cites that streetlighting and outdoor retrofit lighting using 4000 Kelvin white LED lamps could result in a factor of 2.5 increase in light pollution.

These insects are food for bats, and as already been said this place is part of their foraging route and is likely to be adversely affected rather than improved in any way.

5.Bats & Birds

The Bat Report in the planning application was carried out in March 2019 with a recommendation that the area be checked again in following July. There is no evidence that this was done and the report was only valid for one year, so that it is effectively two years out of date. The original survey was carried out in March, a sub-optimal survey time according to Elite Ecology Bat Surveys.

The former One O' Clock club building has been deserted since the start of 2020 and the building is in poor repair with holes in the eaves boards potentially giving access to a roof space place for a roost. This should be checked before any work is begun. The Bat Report demonstrates that the bat foraging corridor extends well into this area, indicating that there are insects and moths here to be fed on -further reason not to reduce or harm any of the tree and vegetation growth.

Loss of trees and foliage and a huge increase in artificial light at dusk cannot fail to have a detrimental effect on the bats foraging activities here.

The Bat Report in the planning documents also refers in paras 3.5 and 4.3 that birds are foraging in "the beautiful garden" (of the former One O' Clock Club) and the margins of the pitch. Item 4.3 recommends protection of the latter, but both these areas will be utterly disrupted by a) the project building works and b) the use of the development by hundreds more people than before, every day, in a relatively concentrated space.

6.Plastic Grass and soil pollution

A 3g pitch surface is proposed for the development. Plastic grass is a deeply unsustainable product both in the way it is manufactured from petroleum derivatives and the problems it poses in being non recyclable. The existing pitch surface is crushed stone ,a natural material with no harmful effects on the surrounding grassland. Plastic grass degrades under the continuous pounding of boots and fragments of the plastic, carried onto the surrounding open grassland where the rain washes it into the soil, will pollute it for centuries. **It is not a sustainable material to introduce onto a hitherto unpolluted grass area.**

7. In Conclusion

The development of the pitch will enclose an open space that has been enjoyed freely by the community and natural life for over 40 years. It will have a serious impact on the existing ecology in terms of the disruption by building works, increased lighting, increased **noisy** human activity, damage to trees and vegetation. **None of these will enhance the existing habitat and wild life and the entire scheme shows negligible biodiversity “gain” over what is already thriving in place.**



Birch tree to be felled North side of Boxing Club

Leonie Noble April 2022

SW12 9QE

