Friends of Stave Hill and Friends of Russia Dock Woodlands

**OBJECTION TO PROPOSED DEVELOPMENT AT ROBERTS CLOSE (K1) APPLICATION - 18/AP/1604**

The Friends of Russia Dock Woodland (FoRDW) and Friends of Stave Hill Ecology Park (FoSH) are local supporters of Russia Dock Woodland and Stave Hill Ecology Park, a designated Local Nature Reserve. We strongly object to the above development proposal known as ‘K1 Roberts Close’. Our objections are as below, and we have included photographs to illustrate the points raised.

The proposed development is not in keeping with other developments on the woodland margins. The proposed design does not take into account the wildlife and habitat value of the woodland and ecology park, which has been designated as a Local Nature Reserve. There is no mitigation by design to counter the impact of the proposed development.

* The proposal does not encourage interaction with the wildlife habitats. The proposed design does not feed into the woodland and ecology park, therefore inhibiting active observation and promotion of interest. Reports from bodies such as the Institute for European Environmental Policy and The BioScience Journal clearly demonstrate that access to and involvement in green spaces leads to healthier communities and individuals.
* Recent developments located on the perimeter of Russia Dock Woodland e.g. Quebec Quarter, London Square, Redwood Park & Fisher Close have all paid environmental respect to the boundaries of this Local Nature Reserve by stepping down (see figure 10) towards & back from the woodlands perimeter. These substantial buffer zone strips (see figures 11 and 12) using their own land between the Woodland and the nearest building were negotiated between the developers and local stakeholders at pre-planning stage.

We feel very strongly that K1 at Roberts Close is a massive overdevelopment for a very small 0.6 Hectare / 1.3 Acre site.

The proposed development is double the suburban density and above urban density for dwellings. Both the ecology park and woodland are designated as suburban. We are concerned that a high-density block will have a negative effect on the adjacent Local Nature Reserve and is not in keeping with the immediate locality.

* A proposed 84 Units equating to 750 habitable rooms per hectare is above the maximum Urban Densities in an undeniably Suburban Area (see photographs of immediate surrounding area, figures 1 to 9).
* We are not opposed to development of the site, per se, but feel a development of below 50 units on such a small site would better give the opportunity for the development to be more appropriate in size and allow for a more architecturally interesting design for such a sensitive location, putting it in keeping with its immediate surroundings.
* Increased nocturnal light pollution from a densely populated development will have a negative effect on wildlife, particularly birds and bats.
* A high-density block will create an increased footfall. Whilst an increased footfall over time in the woodlands and ecology park is to be expected, this footfall will be concentrated in one section. There will be long term damage to the woodland habitat caused by the establishment of “off road” tracks. This will also have a long term and negative effect on established populations of flora and fauna.
* The TfL - Quietway 14 Pedestrian/Cycle Route is proposing to run directly along the development’s (K1) northern & eastern borders. We feel this will cause conflicting congestion in an otherwise safe, open, & airy approach to Russia Dock Woodland and Stave Hill Ecology Park. Both parents and children congregate outside St John’s, and Alfred Salter Primary Schools during the morning and afternoon school runs.

We are concerned about the lack of consultation with local community bodies and the lack of communication from the development agency. We are particularly concerned that community bodies directly affected by the proposed development have had so little information.

We have grave concerns regarding the general environmental impact of the proposed development. We feel the negative impact would affect the local communities use and enjoyment of the Local Nature Reserve and would have a detrimental effect on the flora and fauna.

* Shadowed areas and loss of sunlight will directly affect people accessing the park and woodland. People use and need well lit open spaces which provide access to nature, not shaded areas with minimal wildlife value. There are numerous studies that highlight the importance of access to nature by urban communities. Dark unwelcoming areas of woodland are less frequented by woodland users and encourage antisocial behaviour and misuse.
* The woodland and ecology park have, since their establishment, actively promoted and encouraged the concept of ‘free-range kids’. Exploration, den-building and camps are encouraged in most areas. Children, and their parents, will not be attracted to shaded areas, particularly if those areas have shade tolerant vegetation such as stinging nettle. A lack of vegetation caused by shade will also decrease a play site’s attractiveness. In consequence, we would expect over-use of other parts of the site, potentially in areas that are more sensitive.
* Shadowing of the Local Nature Reserve will directly affect plant, bird, invertebrates and amphibian population. Loss and reduction of sunlight will affect local ground temperatures and will reduce photosynthetic activity, plant growth, flowering and seed setting. This will result in the loss of flowering species to invasive shade loving species. This will have a detrimental effect on associated invertebrate, mammal, amphibian and bird species. Invertebrates do not function well at lower temperatures and require morning sunshine to become active. Their ability to feed, reproduce and evade unnatural levels of predation will be diminished. Birds, bats and amphibians will have available food sources of fruit, seeds and invertebrates will be directly affected.
* Excessive nocturnal light pollution will directly impact on the bird, bat and invertebrate populations, affecting nesting seasons in birds, flight paths in bats and seasonal predation of invertebrates and plants.
* Increased local noise pollution in the morning and evening from windows, courtyard and balconies will interfere with the communication, hunting, mating and choice of nesting/living sites of birds, insects and bats.
* The changes to habitat, as described above, will directly affect the local communities’ enjoyment of, and access to nature.

In addition to our concerns regarding general environmental impact, we believe that there will be a direct and specific impact on the ecology park’s flora and fauna. We believe that invertebrates including butterflies, moths and bees will be affected. In 1994, Stave Hill Ecology Park was designated Britain’s first Urban Butterfly Sanctuary. The southern end of the ecology park was landscaped to create specific butterfly and moth habitats. Shadowing of this area will directly affect both resident and visiting populations.

* Reproduction and larval forage will be reduced if the plants required for egg laying and forage are shaded out. Butterflies visit sunny enclosed spaces for forage and breeding.
* Overwintering adult butterflies, moths, and pupae will be directly affected by shading and lower ground temperatures. Shaded areas stay cooler for longer and will not be used as sites for pupation or overwintering. Emerging butterflies and moths require direct sunlight to increase metabolic activity, allowing them to be active in feeding, breeding and escaping predators.
* The butterfly and moth populations are dependent on an established community of flora, which will be affected by shading. Population size and species diversity will be diminished, as habitats become dominated by shade tolerant, invasive species.