

Subject: Antrim Grove Allotments Planning Application

Reference: 2021/4075/P.

Dear Planning Officers,

I would like to make some Comments on the above application. Please forward to the relevant officers.
I am sorry that they are too long for me to add easily under the Comments section of the website.

Community issues:

Playground closure:

In neither the notice on the lamp post outside the site, nor in the planning application, does it make any clear reference to the closure of the childrens' playground in such a way as local people will understand that the playground will be closed for several months. Only in the "Design and Access Statement" is there any indication at all that the footpath will be closed and that there will be a contractor's compound on the site. Most people will not read this nor perhaps, understand the implications. I regard this as a deliberate deception.

Lack of traffic management plan:

I cannot find any traffic management plans or notes anywhere in the application, although the volume of trucks and transport are likely to be very considerable. The soil needed to cover the site and the gabions will entail many truckloads and need a rather more finely-detailed organisation than the the newly-placed parking reservation suggests. A reservation of 3 places does not indicate the considerable nuisance that will ensue in such a narrow street where trucks will cause havoc. Both Antrim Grove and Antrim Road are narrow and used by locally-living motorists and the footpaths by pedestrians. There are no places for cars to pass.

Many of these pedestrians often have prams and children in tow. Glossing over these points reflects badly on the project management and shows a lack of both commonsense and common courtesy to the community. To my knowledge no attempt has been made by the project management to engage with local residents over this.

The project management are quite aware of the traffic disruption because their Application makes a point that there will be no soil *removal* as a positive virtue in the applicants favour.

As a plot holder who has followed this closely, my impression is that many truck loads of soil will be dumped on to the playground - clearly at the lower end - and then transported on to the site.

None of this is clearly covered, nor in any detail, in the "Design & Access Statement" of the application

Sustainability:

The project is unsustainable. The site is to be covered by 500mm of imported earth and surrounded by a "capping barrier" of gabions to contain that earth. There are, I note, no indications of the volume of the soil required - it will be a considerable amount requiring many trucks (see above).

The project was never adequately discussed with allotment tenants, but we know that there might have been other options.

One was for the plots to be done as a series of "raised beds". This is only indirectly referred to in the Application, which occasionally and confusingly actually represents the project thus at times.

The "raised beds" option would have entailed less than half the imported soil now envisaged. It would NOT have required gabions nor the dismantling and raising of the shed (presumably to be put on more concrete). It would also have allowed much of the grass sward to be retained and perhaps some fringe and incidental plants around the outside. In short it would not have created so much environmental damage nor to such a complete degree.

There are no indications in the Application for the sources for both the soil and the rock gabions. These are likely to need transporting from some distance outside London. We believe the gabions will consist of limestone rock and these in particular, will have been sourced from an area some distance away. Because of the amount there will be many trucks required for just the gabions alone.

Environmental impact:

The "Preliminary Ecological Appraisal" [PEA] is totally inadequate. It fails to recognise the important nature of the site in a local environmental and wildlife context. It is not objective and the author concentrates too much on bats and the lack of rare species, which is not the main importance of the site. The site is particularly important because of the relationship between insect pollinators and native and cultivated flowers and the ecological relationship between the site and the surrounding gardens, creating an expanded area that forms an important "green lung". All of this will be damaged with immediate effect by the project. Much of the environmental damage could be permanent and where some recovery might be made, this is likely to be slow even with the co-operation of the gardening tenants.

The report is very much a "desk study". I believe the author made one visit to the site in the middle of the day. He was clearly unfamiliar with the area, not to mention the site. As a result the report is full of caveats, confusions and assumptions. He seems to have failed to spot the site's main pond which is clearly visible. He dismisses another small pond as having no importance, although frogs spawned there this year and in previous years. Removal of these small ponds will have a detrimental affect in future years.

He failed to find evidence of foxes, although there is rumoured to be a den nearby and we know that foxes use the site at night. Similarly he failed to see evidence of amphibians (frogs), although they are common in hidden places on many plots. He only noted 3 common birds because of the time of day he was there. The site is used by up to at least 10 birds regularly - blackbirds, robins, wrens, several species of tits etc. These birds use the site on a daily basis but tend to arrive more often in the early morning and late afternoon than in the middle of the day. Other animals, including foxes, also have their own routines of appearance on the site.

The report noted 62 vascular plants and admitted this was "a fairly high number". There is a close and important relationship on the allotment between the plants and the insects. The report did not elaborate on this. To give one example, the native Coltsfoot plant which is common on the allotment is host to the Gypsy Moth caterpillar. This relationship is not replicated in domestic gardens where Coltsfoot would be pulled up as a weed..

The report dismisses the common pollinating insects (Invertebrates 6.4.24) in the sentence: '*However, the proposals will result in the loss of pollinating opportunities for other more common invertebrates*'. Once again, this suggests that to the author, there is nothing special about common species such as a variety of bees, bumblebees, wasps, hoverflies and dragonflies etc. On the contrary, the loss will be devastating. These insects will not just fly off to another garden and return. Some may be dormant and have that destroyed, others will be existing as larvae or as eggs in plants waiting to emerge in the spring. Once again any recolonisation will take a great deal of time.

The potential importance of the site for invertebrates and insects was also evident several years ago when a group of scientists visited as part of a plan to plot "bee paths" in to London.

Finally, I also question whether the ecologist was instructed correctly as his report fails to mention the gabions and the inhibiting effect they will have on small wildlife, such as frogs, returning to or recolonising the site.

Local planning policies:

The Local Planning Policy talks about protecting and enhancing sites of nature conservation and biodiversity. It mentions the protection of gardens, improvements to green corridors, the need for vehicles to avoid the disturbance of habitats and species and ensuring that nature conservation objectives are met. Yet the Application appears to fail on many of these measures ?

Could the Planning Dept. please acknowledge receipt of these comments ?

Please post them on the appropriate website if necessary.

Regards,

Phil Wilson

