

From: <mailto:>

Sent: Wednesday, April 22, 2015 6:03 PM

To:

Subject: [FoHPForum] Parks Service responses to Council's planning sites proposals

Forwarded for your information [see below]

These were prepared by Ian Holt last October.

I happy to share these with the forum as the position of the parks service.

Kind regards

Simon

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Haringey's Site Allocations DPD Reg 18 Consultation Document Nature Conservation Officer Comments – Oct 2014

Infrastructure p9

The delivery plan should look to establish a coherent ecological network resilient to current and future change as identified in NPPF.

Introduction to Green Grid p 14

What is a Green Grid? – The text following this heading does not explain what a Green Grid is.

Why a Green Grid is Important – No mention of flood risk, climate change, ecology, etc, etc?

What are the benefits of a Green Grid? – Again no mention of flood risk reduction, adaptation to climate change, Government targets on biodiversity, etc, etc.

How will the Green Grid be improved? – Refers to a map showing the Green Grid proposed in Haringey but I am unaware of any consultation regarding ecology, climate change, etc, which are key functions of any Green Grid as highlighted in the All London Green Grid SPG.

The Green Grid section focuses on a very limited set of Green Grid functions and as such fails to deliver on many of the other necessary components.

SA 3 – Clarendon Square

Future Planning Requirements should take into account the blue ribbon network which crosses the site and the need to deculvert and restore the River Moselle where possible. The site is also adjacent to an ecological corridor which should be enhanced to form part of a coherent ecological network.

SA 4 – St Ann’s Hospital

St Ann’s is adjacent to 2 SINC’s and an ecological corridor. The site also includes a SINC. Any development should look to protect and enhance biodiversity on site and increase connectivity.

SA 5 – St. Luke’s Hospital

Adjacent to a SINC and close to 2 SMI’s and an LNR. Future development plans should look to enhance connectivity and prevent any negative impact upon the SINC’s.

Wood Green, Turnpike Lane, & Haringey Heartlands p 30

There is a need to recognise the Blue Ribbon Network within any proposals. SuDS should be incorporated to reduce pollution to the River Moselle. Green Roofs should be incorporated in new developments.

SA 14: Wood Green Library

Good to see the possibility of deculverting the Moselle. If not deculverted here it should be deculverted elsewhere as a condition.

SA 15: The Mall, see SA 14 above.

SA 20: North of Hornsey Rail Depot

Proposals fail to recognise the site as part of an ecological corridor directly adjacent to a Site of Metropolitan Importance for Nature Conservation. No development should take place without determining the ecological impact which should be to enhance the ecological connectivity and biodiversity value. Tall buildings and increased human activity within close proximity to the river are likely to cause disturbance which could adversely affect European Protected Species and other wildlife.

This proposal should be replaced with a more generic statement on potential development subject to agreed enhancement to ecological connectivity and biodiversity value.

Haringey Heartlands

SA 24: Clarendon Square Gateway

Support proposals to deculvert the Moselle. If not possible the route should be left open for future opportunity and recognised on the ground through habitat creation and public access.

SA 25: Clarendon Road South

This site is adjacent to ecological corridor which should be enhanced as part of any proposals. Ideally it should be widened and managed as part of landscape proposals. The tallest buildings should be furthest from the corridor in order to minimise disturbance.

SA 26: NW of Clarendon Square

Tall buildings close to ecological corridor could cause disturbance and should ideally be reduced in height, especially if they will over look the reservoir SINC.

SA 27: L/a Coronation Sidings

A tall building in this area would seem particularly insensitive to both the ecological corridor upon which it would stand and the New River SMI, Wood Green Reservoirs SINC, and Alexandra Park SINC and statutory LNR. The proposals make assumptions as to the possibility of improving the function of the ecological corridor whilst imposing a 12 storey building upon it. There is no evidence that this will be possible. As an ecological corridor the emphasis should be on how to enhance its ecological connectivity and function as stated in NPPF and then see what size building if any could be suitable not the other way around.

Sites in the South of the Borough

SA 28: Wightman Rd

The report states:

“While accepting that the quantum of the ecological corridor in this area will be reduced, the function of the corridor should be enhanced through the development.”

This makes assumptions which cannot be guaranteed. The size of an ecological corridor is an important factor in what species will or will not use it, as is a lack of disturbance and the level of light pollution. In order to deliver a coherent ecological network as required by the NPPF we should be looking to increase the quantum of the ecological corridor not reduce it.

SA 29: Arena Retail Park

Support the guideline on a positive contribution to the ecological corridor. Note that the railway line is also a SINC. There should be a buffer zone here and an extension in the width of the corridor. This is of particular importance due to the loss of habitat forthcoming with

new electrification project.

Harringay Warehouse District

SA 31 – 37

All site proposals should look to enhance the adjacent SINCs and ecological corridors in the area. Ideally this would include new links south to the New River SMI. Incorporation of green roofs and SUDs.

SA 38: Finsbury Park Bowling Alley

This site includes a Site of Metropolitan Importance for Nature Conservation and is directly adjacent to a Borough Grade SINC and ecological corridor. European Protected Species could also be adversely affected. The park is currently a largely dark site in a well lit area and the proposal of new high rise buildings overlooking it are likely to effect the SINCs and their ecology. Taller buildings should be located on the road not the SINC boundary.

Any development here needs to enhance the ecology in line with NPPF.

SA 39: 18 – 20 Stroud Green Rd

Directly adjacent to an ecological corridor. Tallest storeys should not be adjacent to the ecological corridor and any development upon this site should enhance the ecological corridor. Green roofs may go some way to achieving this but landscaping close beside the corridor should also be considered.

Highgate Neighbourhood Area

SA 40: 460 – 470 Archway Rd

Opening up of the tunnels to link with the Parkland Walk should not be considered. These tunnels are important in a regional context as no other large hibernation site is known within a 20km radius. It also has the largest number of hibernating Natterer's and Daubenton's bats recorded in Greater London.

SA 41: Former Highgate Rail Station & Gonnerman Antiques Site

This site is a not only an ecological corridor but also a Site of Metropolitan Importance for Nature Conservation and Metropolitan Open Land. As such and given its high importance for European Protected Species the proposed development is inappropriate.

The LDF states that the Council will not permit development unless there are exceptional circumstances & where the importance of the development outweighs the nature conservation value of the site. This cannot be demonstrated for this proposal.

Opening up of the tunnels to link with the Parkland Walk should not be considered. These

tunnels are important in a regional context as no other large hibernation site is known within a 20km radius. It also has the largest number of hibernating Natterer's and Daubenton's bats recorded in Greater London. It should also be noted that alternative routes exist for both pedestrians and cyclists.

SA 42: Highgate School

Although not designated as SINC the school grounds have been identified as being of ecological value. Biodiversity enhancement and ecological linkage should be included within the guidelines.

SA 44: Summersby Road

Site Requirements & Development Guidelines - "The impact of the development on the Queen's Wood should be minimised."

There should be no impact upon Queen's Wood LNR unless it is ecological enhancement.

Higher buildings should be in the centre of the site furthest from the SMI, LNR. It is important that there is no additional light spill onto the site which is habitat for European Protected Species of bat.

SA 45: Hillcrest

Site Requirements – "A new exit from the site onto Southwood Lane should be created." Further information is needed on whether this is pedestrian or vehicular and what impact this would have upon the SINC. I suggest that 'should' should be replaced with 'could' given further exploration of its ecological impact.

Development Guidelines – It is likely that the proposals could have an adverse impact upon the SINC therefore mitigation/compensation will be necessary to improve the overall biodiversity value of the estate.

Sites in the West of the Borough

SA 46: Hornsey Water Treatment Works

This site is located close to a LNR, Borough and Metropolitan SINC's, an ecological corridor, and the Blue Ribbon Network. As such this is a sensitive area and a high standard of biodiversity enhancement should be incorporated into any designs e.g. green roofs and open water SuD's schemes.

SA 47: Pinkham Way

Site Requirements

Proposed Site Allocation/Site Requirements

There should be no residential development upon this site. It has not previously been identified as a site for residential development and no outstanding or exceptional circumstances exist for housing to be built on a SINC of this importance. If employment uses are not economical for this site then it should remain undeveloped for its ecological importance and the employment designation removed.

No mention is made of the sites MOL status or the culverted stream.

Mitigation & or compensation for any loss of habitat should be agreed and ideally be in place prior to any development. If adequate mitigation/compensation cannot be agreed then the development should not take place.

Development Guidelines

The golf course to the south of the site and Hollickwood Park are both SINC's and the ecology of these sites should not be adversely affected.

Any development needs to protect and enhance the sites biodiversity value through mitigation and/or compensation.

Deculverting of the stream should be a condition of development.

"There may be potential to relocate some businesses from Regeneration Areas in other parts of the borough to improved premises at this location." This is not acceptable as if existing or alternative sites exist for development then a SINC should not be developed.

SA 48: Cranwood & St. James' School

Any development should also take into account the MOL, SMI, SINC & LNR status of adjacent and nearby land. As such any new development should look to enhance biodiversity and incorporate features such as green roofs into their design as highlighted in the LDF.

SA 49: Park Grove & Durnsford Rd

The ecological corridor should be extended through the site to Springfield Community Park.

SA 49 (?): Tunnel Gardens

Close proximity to Scout Park the only Great Crested Newt (GCN) site identified within the borough. Adjacent to Tunnel Gardens SINC and close to 4 other SINC's.

Development here should include the creation of a GCN pond and habitat to help maintain and protect the species in line with the Council's Biodiversity Duty.

SA 50: Alexandra Palace

SINC & LNR status should be noted. Biodiversity value of the park should be retained and enhanced where possible.

SA 51: Barber Wilson

Support deculverting of Moselle.

SA 52: Broad Water Farm

The proposals would seem to include the development of part of Lordship Rec which has recently been the recipient of a multi-million pound regeneration project. It is likely that any proposals to develop this land will result in a claim for the return of external funding for the project and face high levels of organised local opposition.

The site is a district park designated as MOL. It has also been identified as a future borough SINC capable of removing an area of deficiency in access to natural green space.

Any development of the estate should include further deculverting of the River Moselle include green roofs and open water SuDS schemes.

SA 54: Leabank

Any development should be set back from the SMI & SINC increasing the buffer zone and enhancing biodiversity. Lighting will be a key issue as will the close proximity to RAMSAR/SPA. Possibility of the development helping to deliver improved green infrastructure including the proposed bridge linking Markfield Park to Walthamstow Reservoirs.