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3rd November 2011

Dear Madam / Sir,

The former Friern Barnet Sewage Works (Pinkham Way site)

I object to the change of designation of the above from "employment" to "industrial" use.

1. The change of designation
The unexpected and surprising change of designation from an "employment" site to an "Industrial" one was announced so quietly by Haringey Council as to be unnoticed. The obvious reason was that Haringey could benefit financially – but only through the destruction of one of the most biologically diverse sites for wildlife in the borough.

Personal experience
For over a quarter of a century I have known a number of local residents who visit the site and enjoy the fresh air and splendid views across the valley to the north. When on the heights you really do experience an unusual panorama as you cannot see any roads at all (not even the A406 North Circular Road). You see what appears to be unbroken countryside undulating to the horizon and confers a great peace of mind in a busy life. Our summer visits gave us and others in the district the quiet enjoyment of experiencing the abundance of wildflowers and bird life. I knew that this was and still is, an important site in Haringey – for its unusual and rare wildlife. And so it came as a shock and disbelief to be told that its official designation became an "industrial" site. Were any of us consulted? Definitely not.

2. General value of the site for wildlife
The site is a valuable link to other local wildlife areas. Indeed some of these other sites may depend on the integrity of this site as a stepping stone for migratory wildlife – butterflies and birds. We do know that migratory birds such as Whitethroats stop here on their journey from Africa to feed (see bird survey). They also fly the extra half mile to the Glebelands and Coppetts Wood LNR for feeding and breeding too.

Perhaps butterflies and bats also commute between this and the nature reserve sites to the north.

3. History
The site had been part of the large Tottenham Ancient Woodland – of which a tiny fragment remains along the northern boundary in the form of ancient Oak trees. These have been dated by ring-counting – back to about 1795.
There is likely to be an ancient lineage of invertebrates associated with this fragment of relic Ancient Woodland.

In the 1840s, the railway line was constructed and trees would have been felled. Later – in the 1880s - the site was purchased by the Parish or Local Board of Friern Barnet for the construction of a sewage works. The Sewage works expanded and then finally closed in the early 1960s, whereupon it was used by Barnet Council as a landfill site that includes large number of concrete columns – street lamp-posts, It was also used as a site by thieves as a dumping ground for stolen cars and motorbikes.
The site was then abandoned.

3. The Diversity of Habitats makes this site almost unique in Haringey
By the 1990s, it was apparent that wildlife from the undisturbed edges had re-colonised the entire site.

At that time, the Conservation officer for LB Haringey and I had the good fortune to explore and discover the wonderful wildlife diversity on this site. The richness was sufficient for the Conservation Officer to recommend it as a Site of Importance for Nature Conservation (SINC). This designation was conferred and still remains.

4. Upon what was this biodiversity based?
The unusually high biodiversity of this site is based upon the diversity of differing habitats created as a result of its history:
by deposits of sewage (nutrient-rich),
by the low-lying sewage containers (wetland),
by concrete lamp posts and concrete rubble (alkaline substrate),
by rusty metal of abandoned vehicles, (elevated mineral levels)
by piles of road asphalt (low moisture levels, high in hydrocarbon)
by sand and rubble – brickbats (low-nutrient and free-draining)

5. How do diverse habitats create a diverse biology ?
The wide variety of the above substrates encouraged the growth of a wide variety of different plant species.

Some plants grow in nutrient-rich sewage (eg lupins),
some grow in nutrient-deficient rubble (Bee Orchids),
some grow in low-lying water-retaining sewage containers (the rare Golden Dock),
some grow in mounds of asphalt (Honesty),

The complexities of moisture levels, of light and shade have created an enormous web of living things, each playing an important part in ensuring the viability of other species in the web of life on this site.

All these different habitats create a mosaic – ie many different micro-environments. Each encourages different species of plants. Each different plant species has different species of invertebrates as well as different fungi associated with it.
Each different tree species has different species of insects and therefore different attractions for bats and birds that forage for these different insects at different times of the year.
The myriad different ground substrates present on this site, encourage a higher biodiversity of plants, insects and fungi than occur in any natural ground found in rural Surrey or Sussex.

6. The Pyramid of life on this site
Here we see the top predators: Sparrow-hawks, Owls, foxes – all dependent on a large number of smaller animals that themselves feed on a large number of smaller creatures and plants. A vast pyramid of living things with **a large area and therefore high biomass of plants are at the base of the of food energy pyramid on this site.**

7. What will be the effects on wildlife of a reduction in area ?
If the site is reduced in area by the imposition of large industrial buildings and internal roads, then the vegetation base of the pyramid will decerease.

The food chain will shrink. The top predators will diminish. But there is sufficient food in the chain for only one pair of Owls and one of Sparrowhawks. Only one of each have been sighted. If the area shrinks, then these top predators will disappear.

If the top predators go – then there will be little to control the population of rats or other vermin. Then we'll experience the resultant ecological imbalance occurring elsewhere, when the Council removed owl-breeding habitats – the rats flourished.

Certainly the loss of trees and vegetation will reduce the number of bats, known to feed and possibly roost on this site.
Each tiny Pipistrelle bat can consume 3,000 midges in one night of feeding.

Removal of bat-breeding habitats can only encourage the spread of midges and gnats.

8. Are any protected species present?
Bats have been seen and detected on this site (see bat survey details)
Bats are European protected Species. They may roost on this site. They certainly commute and forage on this site.

The potential resting places for bats (in holes and crevices on trees on this site) have been described in the Bat Survey commissioned by the London Borough of Barnet in 2010
These resting places may also be used as breeding sites and even hibernating sites for bats.
All these are also protected under UK law
The Wildlife and countryside Act (as amended) 1981,
The Conservation of Habitats and Species Regulations 2010.

Under this legislation, it becomes an offence
(1) to deliberately injure or kill bats,
(2) to disturb them when in their resting places,
(3) to disturb them so as to reduce their ability
    (a) to reproduce,
    (b) to feed,
    (c) to nurture their young or
    (d) to hibernate.

9. Conclusion

The former Friern Barnet Sewage Works site has retained a remarkable high level of biodiversity, of plants and of birds. The presence of bats feeding and commuting and possibly roosting does confer legal protection on their habitats – trees, other vegetation, their commuting routes.

Consequently surveys must **by law** be conducted to ensure there is no negative impact upon bats – ie no negative change of FCS (Favoured Conservation Status) as a result of any proposed plans to change the vegetation upon which the bats depend.

The imposition of large industrial building will reduce the efficacy of this site as a stepping stone to important wildlife sites to the north.

A reduction in the wildlife area of this site could reduce the population of top predators to a level where they might be unable to find sufficient food (eg rats) to continue successful breeding. This may encourage the local rat population to expand uncontrollably.

Dr S. O. Natelson
3rd November 2011