

CREOS

Crouch End Open Space

(Crouch End Playing Fields Protection Society)
(Reg. Charity No. 298650)

**PO Box 2945
LONDON N8 8SB**

13th June 2012

Ms C Whelehan
Team Leader Planning Policy
LDF Team
LB of Haringey

Dear Ms Whelehan,

RE: Consultation on National Planning Policy Framework

INTRODUCTION AND OVERVIEW

CREOS (Crouch End Open Space) is a well-supported voluntary group founded in 1984 to protect and improve the open space bounded by Wood Vale, Cranley Gardens, Park Road and Shepherds Hill. The area includes cricket and tennis clubs, woodland, meadow areas, allotments and Shepherds Hill Gardens.

The open space is designated as 'Metropolitan Open Land' (MOL) and the bulk of it also carries 'Borough Grade I Site of Importance for Nature Conservation' designation.

Our submissions on this consultation are based on our experiences in attempting to ensure that the much loved green and open space in the heart of Crouch End is not eroded by unsuitable development. A particularly bitter recent experience has been the pressure from the private owners and developers operating the Pavilion Sports Club off Park Road to exploit the MOL protection for private profit. The club and grounds were bought relatively cheaply because of the MOL status but immediate and unapproved works and changes of use followed their acquisition and these were

followed by further unsuitable development proposals. These were not the first threats to the site - various housing, school expansion and club developments have arisen from time to time and there have been important changes too in buildings and sites on surrounding land (e.g. the new Park Road Hospital and the redeveloped flats on the site of the former nursing home).

Our concern is that unsuitable piecemeal changes can, over time, be as disastrous for the character, use and appearance of open space as major building projects. Haringey's own Conservation Officers past and present have expressed similar concerns. In our last newsletter Ian Holt, the current Conservation officer, highlighted the major importance of open space such as that found in the CREOS area and warned that MOL and SINC designations '*are perhaps more important now than ever before*'.

The pressure on urban open space is immense and we have good reason to fear that any relaxation of MOL controls will give developers the 'wriggle room' to justify projects which will reduce the quality and character of the area to the detriment of Haringey residents and the wider Metropolitan population. It is for this reason we seek assurances that any modifications to the current MOL policies will strengthen rather than weaken MOL protection and that no ambiguities are inadvertently admitted which can be exploited by those with less concern for the ecological and social benefits of the area.

(NB A full copy of the article written by Ian Holt for our last newsletter is attached and forms part of this Introduction and our Submissions which follow below).

DETAILED SUBMISSIONS

1. It is CREOS's submission that:-
 - 1.1 What is stated in Section 8 of Haringey's Unitary Development Plan (*Adopted July 2006 [HUDP2006]- in whatever form or titles they now apply- and whether they are now defined as Core Policies or Strategic Policies and the strategy / commentary relating to policies*), should not be weakened in any

way by the Council's Strategic Policies as now proposed (Draft: April 2012) or by the commentary on these proposed policies.

- 1.2 In particular, Policy OS2, re Metropolitan Open Land ('MOL') must be maintained unchanged.
- 1.3 Paragraphs 8.1 – 8.10 inclusive should continue to apply, particularly so far as they relate to MOL.
- 1.4 CREOS's particular interest is in the MOL known as Crouch End Playing Fields, N6 (which are also partly in N8 and N10). This area, together with Highgate Wood, Queens Wood and Shepherds Hill Allotments, comprise item 5 in the 9th Schedule to HUDP2006 and is shown edged green, bearing map ref. E10, on the Proposals Map to HUDP2006. It includes all of the Pavilion Sports Club grounds referred to in our Introduction.
- 1.5 Bearing in mind that there is a deficiency of open space in Haringey and London generally, there should be no weakening of Policy OS2 or of policies OS5 and OS6. See paragraphs 6.3.19 to 6.3.22 (inclusive) of Draft: April 2012 Strategic Policies and the commentary on them.
2. Crouch End Playing Fields also include 'Playing Fields' and sports grounds, as identified in Policy OS13 of HUDP2006. Their overriding designation is, however, MOL.
3. In light of the foregoing, we propose the following amendments to Draft: April 2012 Strategic Policies and commentary on them:-
 - (i) In the commentary on Policy SP13 (Open Space and Biodiversity).
 - (ii) In paragraph 6.3.3, delete from the 3rd sentence the words 'designated open spaces or....'.

(iii) In paragraph 6.3.11, delete from the penultimate sentence the words 'or remove' and 'or from'.

(vi) In paragraph 6.3.24, in the first sentence, add the word 'very' before 'exceptional circumstances....'

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Mel Cairns
(Chairman)

Enc. APPENDIX

APPENDIX

Not just a Cricket Pitch – The Importance of our Open Spaces in a Wider Environment.

Our open spaces come in a variety of forms from ancient woodlands and formal parks to playing fields and reservoirs. They can be public or privately owned, provide access to all or just a select few. In Haringey they range in size from pocket parks to large expanses of marshland. This vast diversity in open space is reflected in the multitude of its uses and functions much of which go unnoticed or are undervalued.

It is relatively easy to see the benefit that playing fields can bring in terms of physical health and it takes little thought to expand this to the social benefits of organised sports clubs, the sense of belonging and pride this can install in a community, the opportunities to volunteer and socialise, etc. Less obvious to see is the ability of a football or cricket pitch to retain large volumes of rainwater and prevent flooding, or its ability to reduce extreme temperatures in hot summers through the evaporation of water from the surface of leaves. Woodlands too provide these benefits of water retention and temperature control (even more so) and the trees also help to reduce air pollution as well. Woodland such as that found in CREOS is also used for informal recreation and provides opportunities for education and understanding of our natural environment, being home to numerous species of plant and animal each with its own intrinsic worth. Studies have shown that green spaces also have a positive effect on mental health and well-being, and they can increase the value of surrounding property.

Many of these hidden benefits such as flood control are now being referred to as ecosystem services and globally efforts are being made to put a monetary value on them. What is less easy to quantify is the wildlife value of a site and its impact beyond its own footprint in terms of sustaining biodiversity.

Taken in isolation CREOS for example has been designated as a Borough Grade I Site of Importance for Nature Conservation largely for the habitat and species that can be found there but its role in the wider environment is much greater. Sites such as CREOS offer connectivity to other habitats either directly (e.g. with Queen's Wood) or as a stepping stone allowing species to travel through the landscape. The loss or reduction in size of sites due to development or mismanagement can fragment this network and threaten its viability. With the uncertainty of climate change this has become increasingly important as sites of importance may become unsuitable for species as temperature and rainfall patterns alter beyond that in which they can survive. If the site is isolated and the population is unable to migrate it may result in extinctions.

This was highlighted in a recent report 'Making Space for Nature' on the state of England's ecological network where in order to secure its future effectiveness it stated that we need to;

- (i) Improve the quality of current sites by better habitat management.
- (ii) Increase the size of current wildlife sites.
- (iii) Enhance connections between, or join up, sites, either through physical corridors, or through 'stepping stones'.
- (iv) Create new sites.
- (v) Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites.

So what does this mean for CREOS? It means that as well as having a value of its own to the local residents and wildlife, it is also part of an essential wider network or green infrastructure. It means its protection as a Site of Importance for Nature Conservation and as Metropolitan Open Land under planning designation is perhaps more important now than ever before. That its own value is dependent on the protection of other open spaces and that active management to maintain and enhance its value is necessary in a changing environment.

In general we all need to make sure that we look beyond land as having a singular purpose and look to see how our management choices affect our wider environment.

Ian Holt May 2012