

Public Examination into the Haringey Core Strategy June 2011

Indicative Matters and Issues for Examination

Hearing 5

Matter 8

Is the approach of the CS in general conformity with the London Plan and evidenced adequately with due regard to PPS9 and PPG17? Will the approach be effective, particularly with regard to flexibility?

- i. The Core Strategy approach to open space is based on the principles of sustainable development as set out in Planning Policy Statement 1 Delivering Sustainable Development (PPS1) and local spatial planning as set out in Planning Policy Statement 12 Local Spatial Planning (PPS12). The approach to open space is to set local open space and recreational standards as well as a defined map of open space deficiency across the borough.
- ii. The approach is consistent with the provisions of Planning Policy Guidance 17 Planning for Open Space, Sport and Recreation (PPS17) which encourages all Local Authorities to undertake local assessments of need and audits of open space, sport and recreation provision. The main purpose of carrying out these local assessments is to ensure that there is adequate provision of accessible, high quality greenspaces and sport and recreation facilities to meet the needs of local communities and visitors. By carrying out these assessments, Local Authorities can set locally specific standards of provision.
- iii. Haringey's Open Space Assessment as carried out by Atkins Consultants informed the subsequent Open Space SPD which sets local standards for the borough based on a sound evidence base.
- iv. The Core Strategy acknowledges that all new development should protect and improve Haringey's parks and open spaces and provide additional space in accordance with the Open Space SPD.
- v. The Core Strategy also acknowledges the importance of protecting and improving sites of biodiversity and nature conservation across the borough.
- vi. The approach to open space is considered effective for meeting the currently identified needs of the borough and its growing population in terms of improving access to and quality of the existing open

space and ensuring that new development provides additional open space to meet future needs.

1. Issue 8.1

Is the CS in conformity with the LP and its draft replacement?

- 1.1 Yes, the CS is in general conformity with the London Plan and its draft replacement. In some instances where the draft replacement supersedes any of the policies or where changes are required, this has been covered by individual Factual Statements.

Issue 8.2

2. Is the evidence base in support of SP13 compliant with the advice of PPG17 et al – audit and needs assessment? What is the intended relationship to extant or intended SPD?

- 2.1 The Atkins assessment carried out an audit and needs assessment of the open space and recreation provision in the borough in line with the provisions of PPG17. This was used as an evidence base to inform the existing Haringey SPD - Open Space and Recreational Standards. The evidence base in support of SP13 is therefore compliant with PPG17. A response to this is set out in more detail in the Factual Statement on open space that has been submitted to the Inspector.

Issue 8.3

3. What is the CS definition of local open space (para 6.3.4)?

- 3.1 The reference to “local open space” was a term used in the Atkins Assessment. It was derived from the (then) GLA’s Hierarchy of Open Space and Atkins then classified the number and varieties of different spaces in the borough according to this hierarchy. This included “local parks” and “small local parks and open spaces”. The CS takes the Atkins definition and further defines it at para 6.3.4 – “Local open spaces form part of the wider network of open spaces which are integral and vital to the spatial character of the borough and to residents’ quality of life (further details in SP11 Design). Open spaces of local importance in the borough can include parks, allotments, woodlands, sports facilities, children’s play areas (both formal and informal), back and front gardens, amenity spaces and squares”.

Issue 8.4

- 4. Is para 6.3.21 likely to be deliverable i.e. increased access to Alexandra Palace? Is there undue reliance upon Alexandra Palace to meet the open space needs arising from new development in areas such as Haringey Heartlands? Will such an approach be effective?**
- 4.1 There are current ongoing discussions regarding a s106 Agreement relating to both Clarendon Square and Coronation Sidings (parts of Heartlands) and these discussions will include the requirement to open up the development to existing open space at Alexandra Park. Access to the Park could be opened up by extending the existing Penstock footpath into Alexandra Park. Details of the amount or type of s106 are currently evolving and the EiP will be updated on any progress. The Council considered that the improved access to Alexandra Park is deliverable and will provide an improved access to Alexandra Park from the surround areas, including development at Heartlands. In part, therefore, the improved access to local open space will serve the residents of Heartlands.
- 4.2 The improved links to Alexandra Park will, in line with the provisions of the Open Space SPD, form an important part of the requirement to secure additional public open space/recreation facilities as a result of residential development at Clarendon Square.

Issue 8.5

- 5. How many SINCS existing within the borough? Is the CS approach to SINCS supported by a robust and consistent evidence base?**
- 5.1 There are 59 SINCS (sites of importance for nature conservation) across the borough in total. They are detailed in the GLA's document entitled Sites of Importance for Nature Conservation in Haringey 2003. They are also set out in Table 36 of the Haringey Biodiversity Action Plan. The evaluation of the SINCS carried out for these documents were used to inform the UDP in 2006. The Biodiversity Action Plan (BAP) recognises that there are still some areas of the borough where there is insufficient access to natural green spaces and includes an action to 1) Increase the SINC designation of Lordship Recreation Ground to borough importance by 2014. This is to be achieved through major works such as deculverting the River Moselle, creating large areas of meadow grassland and reed beds, etc. The location of the park will help to reduce a major area of deficiency. 2) Explore the possibility of creating public access to Stroud Green Railway Embankment SINC with Network Rail and Homes for Haringey. 3) Pursue planning gain from new developments for the creation of new

sites in areas of deficiency; particularly in areas where there is a deficiency.

- 5.2 The council recognises that they need to revisit various sites to review their SINC designation and make sure that the quality/quantity of nature present on the site has not diminished to the point where such a designation is no longer justified. The council are currently looking at how any review can take place against a backdrop of competing demands on limited funds.

Issue 8.6

6. Prescriptive figures for children's play space necessary? Too prescriptive? In accord with the LP and Mayor's SPG on Play?

- 6.1 Local play standards are set out in the Open Space and Recreational Standards SPD (Table 1.1). The Core Strategy explicitly says that the provision will be expected to be in accordance with the London Plan and with the Mayoral SPD. The Haringey SPD will also be a material consideration in determining the level of play space that should be provided locally. The setting out of standards for play space should more reasonably be expected to be found in documents that support the Core Strategy (DM DPD or an SPD) and not the Core Strategy itself.

Issue 8.7

7. To what extent is the content of PPS9, particularly paragraphs 3, 4 and 5 satisfied by the Core Strategy? Geodiversity – evidence?

- 7.1 PPS9 Biodiversity and Ecological Conservation sets out the Government's national policies on the protection of biodiversity and geological conservation. Paragraphs 3, 4 and 5 relate to regional spatial strategies and local development frameworks. Paragraph 3 sets out that regional spatial strategies need to incorporate biodiversity objectives, address regional and cross boundary issues in relation to habitats, include policies to conserve and enhance biodiversity, include targets for restoration and re-creation of priority habitats and identify suitable indicators for monitoring biodiversity. The London Plan (with consolidations) sets out a policy on Biodiversity and Nature Conservation at 3D.14. This policy seeks to ensure a proactive approach to the protection, promotion and management of biodiversity. This policy is supported by the Mayor's Biodiversity Strategy which seeks to establish a Londonwide framework for maintaining London's diversity of wildlife. Among other things, the Mayor's Strategy recommends identification of and protection of SINCs (sites of importance for nature conservation), resisting development which would have a significant adverse impact on the

population or conservation status of protected or priority species, and securing compensatory measures to mitigate any unavoidable effects.

- 7.2 In response to the London Plan policy and the provision of the Mayor's Biodiversity Strategy, the Council has identified 59 SINCS in the borough and recognition that the designation of some of these SINCS may need to be upgraded over time.
- 7.3 Policy SP13 of the Core Strategy deals with Open Space and Biodiversity. The policy seeks to ensure that development will "protect and improve sites of biodiversity and nature conservation". In support of this, one of the indicators in the Annual Monitoring Report 2009/10 is "no loss of areas of diversity or open space". Since 2004 when monitoring began, no areas of diversity in the borough have been lost.
- 7.4 The borough has no SSSI designations in the borough, and there are no local designations in relation to Geodiversity. As such, a hierarchy of sites for Geodiversity in the Plan is not relevant. The schedule of SINCS does provide a hierarchy of sites across the borough from those of metropolitan importance down to those that are designated for their local value.

Issue 8.8

8. **Are the CS and SP13 consistent with the London Biodiversity Action Plan?**
 - 8.1 It is my opinion that SP13 is consistent with the LBAP through the protection of sites across the borough for the purposes of nature conservation. These sites have been the subject of a GLA researched document that has designated sites based on their known nature conservation value. The GLA no longer carries out the role of reviewing SINCS and the council recognises that they need to revisit various sites to review their SINC designation and make sure that the quality/quantity of nature present on the site has not diminished to the point where such a designation is no longer justified. The council are currently looking at how any review can take place against a backdrop of competing demands on limited funds.

Issue 8.9

9. **Are green corridors referenced adequately?**
 - 9.1 The Green Corridors are referred to in the CS at 6.3.24 (which states that some of them are also ecological corridors) and they are mapped on Figure 6.2 Open Spaces. Ecological corridors are referred to in the Glossary to the CS where they are defined as "relative areas of green space running through built up areas that allow the movement of

plants and animals to other areas and habitats”. With the Inspector’s agreement the Council suggests a proposed further minor change at para 6.3.24 to differentiate between those sites that are Green Corridors and those sites that are both Green Corridors AND Ecological Corridors.

Issue 8.10

10. Habitat Regulations satisfied? Evidence base adequate? Assessment actioned?

- 10.1 The Habitat Regulations are satisfied by the Core Strategy, as set out in paragraph 1.1.20 of the Proposed Submission Core Strategy. A Sustainability Appraisal of the Core Strategy was carried out by consultants – HYDER. The Sustainability Appraisal Reports for the Core Strategy assesses all alternatives and policy options. An initial Habitats Regulations Screening (HRA) (June 2007) was undertaken during the SA Scoping. This assessed the overall effects of the Core Strategy on any Natura 2000 Sites. This report was submitted to Natural England, who approved the report. The screening assessment found that no significant effects were likely and therefore it was not necessary to carry out Task 2 (Appropriate Assessment) and Task 3 (Mitigation and Alternative Solutions) of the HRA process. The HRA Screening Report was submitted to the Planning Inspectorate along with the final SA.

Issue 8.11

11. Monitoring indicators? Allowance for increase in provision of open spaces, SINC’s etc?

- 11.1 The Annual Monitoring Report (AMR) sets out an indicator for any net loss of open space or biodiversity. The AMR, however, does **NOT** set out an indicator for any net gain of open space. The Council is mindful that there is no indicator to measure an increase in either open space or SINC’s and will correct this as part of the next AMR due in 2010/11 where an indicator will quantify any gain in either open space or SINC’s. A gain in either or these areas will be only likely to come through either negotiation as part of an application, or as a result of a s106 agreement. Once the Council has a Community Infrastructure Levy (CIL) in place, there will be automatic collection of money towards open space improvement/provision across a greater variety and spectrum of planning applications. The Atkins Assessment clearly sets out the areas of the borough where there is an open space deficiency and these areas of deficiency will be taken into account when a levy for any particular part of the borough is set.
- 11.2 Paragraph 11 Key Outcomes and Recommendations sets out, under Open Space, that “We expect that through developments in our

growth areas there will be a gain in open space as well as ensuring they address open space deficiencies”. An indicator to measure the increase as set out in the paragraph above will measure this gain.

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Appendix 1 – List of SINCS as detailed in the Haringey UDP

SCHEDULE 11: ECOLOGICALLY VALUABLE SITES (POLICY OS6)

SITE GRADING

The sites are graded into those of Metropolitan, Borough and Local Importance, definitions of which are given in chapter 4 of the GLC Ecology Handbook No.3 (pages 10-11). In summary:

SITES OF METROPOLITAN IMPORTANCE

These are identified largely on intrinsic nature conservation value from a London-wide perspective, although social value may also be taken into consideration. These sites are the highest priority for protection.

SITES OF BOROUGH IMPORTANCE

These are similarly identified, but taking a Borough-wide view, not that of the whole of London. This means that a Borough site in an ecologically-rich area like Haringey may be intrinsically better than one in a less rich area like Hammersmith & Fulham. Despite the potential variation in quality of Borough sites for different boroughs, those that are richly endowed with wildlife sites are likely to contain more Borough sites than ones which are relatively ecologically deficient. Borough sites are further divided into Borough Grade I and Borough Grade II categories; both types are of significant nature conservation value, but Borough I sites are of greater importance.

SITES OF LOCAL IMPORTANCE

Local sites are those which may be of a particular value to nearby residents or schools. In many cases these sites are already used by schools for nature study or are run by management committees mainly composed of local people. Local sites are particularly important in areas deficient in nearby wildlife sites. Areas of deficiency are here defined as those areas of built-up London which are more than a kilometre from an accessible wildlife site of at least Borough importance. If there are sites within such areas which offer at least limited interest for observing wildlife, or which have the potential to develop this interest, these will be chosen as local sites, as long as they have access or there is likelihood that this could be negotiated.

LOCAL NATURE RESERVES

Section 21 of the National Parks and Access to the Countryside Act, 1949, gave local authorities the power to acquire, declare and manage nature reserves. They are areas where the aim is to preserve manage and enhance the nature conservation interest of the selected site and provide the opportunity for study of flora and fauna of special interest.

SITES OF METROPOLITAN IMPORTANCE		
Number	Name	Map Ref
1.	The Lee Valley near Walthamstow. Part is included in the Proposed Lee Valley Special Protection Area as listed under the EC Directive on Wild Birds.	Cross Borough
2.	The New River.	Cross Borough
3.	Parkland Walk.	Cross Borough
4.	Highgate Wood. (includes Alexandra Palace track bed), N6	D10
5.	Queens Wood, N6	E10
SITES OF BOROUGH IMPORTANCE (GRADE I)		
6.	Coldfall Wood, N10	C7
7.	Railway Fields Nature Reserve, N4	L11
8.	Alexandra Park (inc. Nature Conservation Area), N22	G8
9.	Former Friern Barnet Sewage Works includes Alexandra Road Depot, N10	E4
10.	Bluebell Wood and Muswell Hill Golf Course, N10	F5
11.	Crouch End Playing Fields Complex, N8	F10
12.	Scout Park, N11	G5
13.	Wood Green Reservoirs, N22	H7
14.	Tottenham Marshes, N17	T5
SITES OF BOROUGH IMPORTANCE GRADE II		
15.	Fortis Green Covered Reservoir and playing field, N10	C9
16.	Tottenham Cemetery and Bruce Castle Park, N17	P5
17.	Former Railway Lands, Park Avenue, N22	J7
18.	Grove Lodge, Muswell Hill, N10	F9
19.	Tunnel Gardens, N22	G5
20.	Highgate Golf Course, N6	B11
21.	Finsbury Park (excluding New River and Parkland Walk), N4	L12

Number	Name	Map Ref
22.	Tottenham Railsides.	Cross Borough
23.	Markfield Recreation Ground, N15	R10
24.	Tottenham Hale to Northumberland Park Railsides.	Cross Borough
25.	Harringay Stadium Slopes, N4	M11
26.	Stroud Green Railway Bank, N4	K11
27.	Holickwood Park, N10	E4
SITES OF LOCAL IMPORTANCE		
28.	Rhodes Avenue Spinney and Albert Road Recreation Ground, N10	F6
29.	Lordship Lane Recreation Ground and allotment gardens, N17	N7
30.	Harrington Site, N6	E13
31.	Southwood Lane Wood, N6	D12
32.	St Anne's Hospital Grounds, N15	M10
33.	Downhills Park, N17	M8
34.	St Mary's Churchyard, Hornsey, N8	J9
35.	New River Sports Centre, White Hart Lane Recreation Woodside Park and allotment gardens, N17.	L5
36.	Nightingale Gardens and Avenue Gardens, N22	H6
37.	Priory Park, N8	H9
38.	Paignton Road Open Space, N15	P11
39.	Land adjacent to Fortismere School, Creighton Avenue, N10	C7
40.	Muswell Hill Playing Fields, N10	C6
41.	Down Lane Recreation Ground, N17	R8
42.	North Bank, Pages Lane, N10	D8
43.	Allotments, Middleton Road N22	J5
44.	Allotments, Devonshire Hill Lane, N17	N4
45.	Allotments, Rivulet Road, N17	M5

Number	Name	Map Ref
46.	Allotments, Stockton Road, N17	M5
47.	Allotments, Gospatrick Road, N17	M5
48.	Allotments, Courtman Road, N17	M5
49.	Allotments, Marsh Lane, N17	T6
50.	Allotments, Millmead Road, N17	S8
51.	Allotments, Coppetts Road, N10	D7
52.	Alexandra Palace Allotments, N22	F8
53.	Allotments, Yeatman Road, N6	C11
54.	Shepherd's Hill Allotments, N6	F11
55.	Tower Gardens, N17	N6
56.	Granville Park Wood, N4	J11
57.	Bruce Grove Wood, N17	Q7
58.	Rear of 3 Fairfield Road, N8	H10
59.	Chestnuts Recreation Ground, N15	M10
LOCAL NATURE RESERVES		
A.	Railway Fields, N4	L11
B.	Queens Wood, N6	E10
C.	Parkland Walk.	Cross Borough
GREEN CORRIDORS		
1.	New River, including Nightingale Gardens	Cross borough
2.	Parkland Walk (Section from Highgate Underground Station to Finsbury Park	F12
3.	Northern Line railsides, Alexandra Palace track bed and Highgate Station Cutting	D11
4.	Great Northern Line Railsides from Finsbury Park to Bowes Park station and Wood Green Tunnel Gardens.	Cross borough
5.	Stroud Green to Tottenham Railsides, including South Tottenham Triangle	Cross borough
6.	West Anglia Route Railsides	Cross borough

7.	River Lee and Tottenham Marshes	Cross borough
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