

Date: 2 November 2011
Our ref: 36313
Your ref:



Ms Ciara Whelehan
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Dear Ms Whelehan,

**Haringey Local Development Framework (LDF) Public Consultation
Town and Country Planning (Local Development) (England) (Amendment) (2008)
Publication of a Development Plan Document (Regulation 27) Haringey's Core Strategy
- Revised additional Regulation 27 on Fundamental Changes to Employment Land
Designations and Affordable Housing**

Thank you for your correspondence dated 22 September 2011, received in this office 20 October 2011, requesting Natural England's views and comments on the above planning application. Your letter has been passed to me as a member of the Land Use Services Team for response.

Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.

Under paragraph 3.2.7 Maximising Housing Supply in Haringey there is the sentence "Such sites will be assessed to ensure that they meet the needs of the community and do not harm the environment", this is a welcomed and supported statement by the Council, but it could and should be extended to other land uses including commercial, industrial and community, not just residential sites. This will link in to the Councils objectives relating to Biodiversity, Environment and Climate Change.

Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made explicit in the Core Strategy and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions. Development Plan Documents and Site allocations should also take this into account when identifying and assessing sites.

The Friern Barnet Sewage Works site is mentioned specifically in the document. Natural England has previously commented on the Scoping Opinion for this site, identifying the environmental and biodiversity elements of the site.

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The site in question is a Grade 1 Borough Site of Interest for Nature Conservation (SINC) and is surrounded by other SINC's. Concerns over loss of habitat and fragmentation of habitat have been expressed in our correspondence. Loss of habitat and biodiversity and the potential for fragmentation would appear to be at odds with the Council's Objectives relating to Ecology, Biodiversity, Climate Change and Accessible Open Spaces.

In general Natural England is not supportive of development on Sites of Interest for Nature Conservation. However, if a SINC is identified in a Site Allocations, or as mentioned in this Development Plan Document, as a potential area of development, the Council must ensure that the developer complies with London Plan Policy 3D.14 which states that "Where development is proposed which would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site, and if that is not possible, to minimise such impact and seek mitigation of any residual impacts. Where, exceptionally, development is to be permitted because the reasons for it are judged to outweigh significant harm to nature conservation, appropriate compensation should be sought".

The Council needs to consider impacts on the natural environment in respect of development proposals. The use of the existing natural signature of the borough can be used to help deliver objectives relating to biodiversity, ecology and climate change. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.

Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the Green Grid/Open Spaces section of the Core Strategy. The London Landscape Framework can be found at:

<http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx>

Local wildlife sites

If proposal sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.

Protected species

If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9¹ provide information on BAP and protected species and their consideration in the planning system.

We would draw the Council's attention to our protected species standing advice, which provides guidance on when protected species may be impacted by a proposal. The advice can be found at:

¹ Government Circular: Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system ODPM Circular 06/2005/Defra Circular 01/2005

<http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx>

Biodiversity enhancements

Applications for development provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The Council should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 14 of PPS9.

Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. Section 40(3) of the same Act also states that '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.

I hope that this makes Natural England's position clear but if you have any further questions about this letter or require further information please do not hesitate to contact me.

Yours Sincerely,

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