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Dear Mr Kelly

Planning consultation: Draft Site Allocations DPD: Preferred Option

Thank you for your consultation on the above dated 09 February 2015 which was received by Natural England on 09 February 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have considered the contents of the documents submitted to us and comment as follows:

Green Grid approach

We support the Green Grid approach to open space access outlined in this Draft DPD. However, as regards "the opening up of access to the Lee Valley Regional Park" (page 11), we would emphasise that parts of the Park are Special Protection Areas (SPAs) and as such are strictly protected sites under European legislation, classified for rare and vulnerable birds and for regularly occurring migratory species.

The following link on our website provides access to details of individual Sites of Special Scientific Interest (SSSIs) - <http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm>.

The impacts of such green connections and links on the protected areas of the Park should be taken into account when considering such proposals.

Green infrastructure

The National Planning Policy Framework (NPPF) states at paragraph 114 that:



“Local planning authorities should ... set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”.

The NPPF also states at paragraph 117 that local authorities should plan for green infrastructure and:

“ ... promote mixed use developments and encourage multiple benefits from the use of land in urban ... areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)”.

Haringey is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England would encourage the incorporation of GI into developments in this area.

GI can be designed to maximise the benefits needed for this area, for example it can be used to promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses. It can also be used to improve connectivity to other green spaces and to improve conservation and biodiversity.

The following link provides access to guidance for local planning authorities on Green Infrastructure: <http://www.publications.naturalengland.org.uk/publication/35033?category=49002>.

Sustainability Appraisal

In the case of proposed developments, which are located close to SSSIs, we would emphasise that it would be advisable if new housing in Haringey is located away from the boundaries of the SSSIs. We would recommend project-level assessments to determine whether significant harm is caused to the SSSI interest features and that applicants speak to Natural England prior to submitting planning applications for proposed development near to the SSSIs in order to assess possible impacts.

The National Planning Policy Framework (NPPF) outlines the importance of the protection of SSSIs and any proposed development not having adverse impacts on SSSIs at paragraph 118, as follows:

“...(any) proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.”

Natural England has published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs). This helpful GIS tool can be used by LPAs to help consider whether a proposed development is likely to affect a SSSI and determine whether they need to consult Natural England to seek advice on the nature of any potential SSSI impacts, their avoidance or mitigation. The dataset and user guidance can be accessed from the [gov.uk website](#).

For any queries relating to the specific advice in this letter only please contact Gillian Fensome on 07879 800855. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

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