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Dear Mr Kelly

Planning consultation: Alterations to the Strategic Policies (DPD) (adopted 2013)

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 document submitted to us and have the following comments to make:

Estate renewal within Haringey

We note at page 26 that Haringey Council is considering the replacement, renewal or improvement of estates within Haringey and we would emphasise the importance of securing green infrastructure (GI) improvements during such plans.

The National Planning Policy Framework (NPPF) states at para 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 para 117 that local authorities should:

“ ... 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)”.

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. We strongly encourage you to maximise opportunities to incorporate GI during the re-development of estates.

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

Green roofs

One way of providing enhanced green infrastructure and biodiversity in such an environment can be through the provision of green roofs.

Natural England is supportive of the inclusion of green roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding, reducing the requirement for heating and air-conditioning and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions and <http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf> (London GLA 2008) regarding the fit with the London Plan policy.

Growth Areas and Areas of Change

We note at page 35 that the Tottenham Hale Growth Area and the Northumberland Park and Tottenham High Road Corridor Areas of Change are located close to the Sites of Special Scientific Interest (SSSI) at Walthamstow Reservoirs and Marshes and the Lea Valley and 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.”

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

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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