

Date: 26 March 2015
Our ref: 144459



FAO Stephen Kelly
Assistant Director of Planning
Haringey Council
Strategic Planning
6th Floor
River Park House
Wood Green
N22 8HQ

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

SENT BY EMAIL ONLY TO Idf@haringey.gov.uk

Dear Mr Kelly

Planning consultation: Draft Tottenham Area Action Plan: 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 have the following comments to make:

Lee Valley Regional Park

We note that Haringey Council considers that access to the Lee Valley Regional Park is poor at present and that it is considering providing enhanced connections to the Park, including creating better pedestrian and cycle links into the Park and a new Green Link leading into the Park.

We would emphasise however 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 SSSIs - <http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm>.

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

Green spaces

We support Haringey Council's proposal to incorporate "village green" spaces into new



developments and to add new public spaces and improve existing spaces so that Tottenham has a quality network of green and accessible spaces (page 20).

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>.

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.

Sustainability Appraisal

We note that the Sustainability Appraisal refers to the protection and enhancement of biodiversity (at page 4), but we agree with the statement at page 15 that the “effects (of the plan) on biodiversity and open space (are) .. unclear”. We would recommend that more detailed project-level assessment is made of the impacts of proposed developments on biodiversity prior to submitting planning applications for proposed developments.

We note that several of the proposed developments are located close to the boundaries of the SSSIs in this area. 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

Gillian Fensome
Sustainable Development and Regulation
Thames Valley