Anna Lunn 30th July 2019

SLC

2nd Floor

3 Boltro Road

Haywards Heath

West Sussex, RH16 1BY

Dear Anna,

**WEST HENDON PLAYING FIELDS MASTERPLAN**

Thank you for giving London Wildlife Trust the opportunity to feed into and comment on the developing masterplan for the West Hendon Playing Fields.

I have already fed back verbally some of the Trust’s key concerns and comments to Toby Kingsbury of SLC earlier in the month. London Wildlife Trust supports the development of the masterplan and we welcome the ecological survey and analysis undertaken to date (Preliminary Ecological Appraisal, MKA Ecology, September 2018) and the discussions with Natural England in respect of the Welsh Harp Site of Special Scientific Interest (SSSI).

We acknowledge that there have been some further changes to the masterplan since the 2018 draft, which have addressed some of our previous comments. Nevertheless, there are still elements which are of concern I set these out in a little more detail on the following pages, and hopefully they can inform the further refinement of the design, especially to further minimise the adverse ecological impacts, and where possible secure gains for biodiversity. This is especially important in the context of the Welsh Harp SSSI, Local Nature Reserve, and Site of Metropolitan Importance for Nature Conservation designations that fall within the masterplan boundary.

Our comments complement those made by our local volunteers, some of whom have a detailed knowledge of the site.

Yours faithfully,



Mathew Frith

*Director of Conservation*

c.c. Matt Gunyon, Partnership and Development Manager, Greenspaces, LB Barnet

**WEDST HENDON PLAYING FIELDS DRAFT:**

**London Wildlife Trust comments*, July 2019***

**Site boundary**

There is some potential confusion as to the scope of the masterplan, given that the indicative map (*1089\_West Hendon Playing Fields*, Rev D, Southern Green) includes land associated with the Welsh Harp Reservoir, Woodland Park, Welsh Harp Open Space as well as land in neighbouring Brent. Whilst it is appropriate to embed the masterplan in the landscape environs of the area, the plan does not show where the scope of the Playing Fields is effectively confined to (in terms of a red line). There are likely to be elements of the proposals that may or may not form part of the eventual development, such as upgraded circulatory routes and lighting extending to the south of the Playing Fields. Some detail as to how these will be addressed will be useful.

**Nature conservation designations**

We feel that the Masterplan still does not give enough weight to the combination of nature conservation designations that cover part of the Playing Fields, and on the sites adjacent to them. Not only the Welsh Harp Site of Special Scientific Interest (SSSI), for which Natural England have provided a response (letter, 13th June 2019) and requiring some further surveys, but also the Welsh Harp Local Nature Reserve (LNR) and the Site of Metropolitan Importance for Nature Conservation (site M035 *Brent Reservoir*) both of which extend significantly into the Playing Fields.

Barnet Council, under s40 of the Natural Environment & Rural Communities Act 2006, has a duty “*in exercising its functions,* *have regard so far is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*.” The application of these designations – two statutory, the SSSI and LNR, the other, the SMINC, through the Council’s Local Plan – are significant means to address this within the Masterplan.

The current direction of national and regional planning policy is to better protect and where possible extend existing ecological sites, through ecological mapping and implementing the principles of ‘bigger, better, more of and more joined up’ (as set out in *Making Space for Nature* (aka The Lawton Review), 2010). Whilst there are elements of this approach in the draft masterplan, they appear more to serve the recreational aspirations of the Fields rather than make more resilient the existing ecological infrastructure given the pressures that are likely to be exerted upon it.

The impacts of proposals for recreation within the curtilage of these designated areas require addressing either by relocation, redesign and/or appropriate mitigation.

**Play pitches**

The area designated for play pitches does have an ecological value, although this mostly lies outside the designated sites. The fields provide roosting and foraging areas for gulls and corvids, as well as for winter migrants such as fieldfare and redwing. Trees and other vegetation also support foraging and shelter areas. Intensification of usage through the new pitches will have an adverse impact and we recommend that surveys (as recommended in the Preliminary Ecology Appraisal (MKA Ecology, September 2018)) are required to assess this in more detail so that impacts can be reduced or mitigated.

We are concerned at the proposed implementation of two full-size artificial astroturf pitches. We acknowledge that there is a demand for these across London, but we don’t believe sufficient consideration has been given to their accumulative environmental impacts, such as loss of open grassland (and effective capping of soils), accompanying lighting, as well as the use of plastics in their creation.

If the Council were minded to proceed with these, they should be placed as far away from the boundaries of the LNR/SMINC as possible, in the north-western corner. Nevertheless, there will be a net loss of grassland (albeit of relatively low ecological quality) which at present does not appear to be mitigated for.

The proposed location of one of the U13/14 pitches (east of the proposed avenue planting down the middle of the site) lies partly within the Local Nature Reserve, requiring the loss of scrub and two mature trees. These are of value to breeding birds, including whitethroat. It is not clear how this loss would be mitigated for if this proposal was to proceed. We recommend that this is relocated to the north (adjacent to the other two U13/14 pitches), which would then require a redesign of the central path.

Losses of grassland through new infrastructure and artificial pitches could potentially be mitigated by enhancements to parts of the LNR, for example the portion currently allocated for the U13/14 pitch.

**Sports hub, golf course, community garden and associated features**

We welcome the proposed relocation of the tennis courts outside of the LNR to the north of the site. We also generally welcome the clustering of features in this part of the site, as well as the community garden, orchard, play spaces, and other naturalistic features. We recommend that this should extend to living roofs on the sports hub building. We also welcome the inclusion of SuDS and other water management features that help to improve the surface water management of the site and reduce adverse flows and/or diffuse pollution into the Silk Stream and Brent Reservoir.

**High ropes course**

This is proposed within woodland within the LNR. The Trust has objected to similar proposals elsewhere in London, as we see little evidence of their impacts being benign. Such courses inevitably result in trampling and compaction of woodland soils, disturbance to woodland biodiversity (e.g. breeding birds) and damage to trees and flora. We object to its location within the LNR; it should be located elsewhere on the site outside the LNR and SMINC.

**Lighting**

We acknowledge that a well-used amenity area will require lighting to maximise its use throughout the year and ensure users’ security and safety. However, an increase in lighting, especially within and adjacent to the SSSI and LNR, is likely to have adverse impacts on biodiversity without an appropriate design strategy based on the principle of ‘less is best.’

We concur with Natural England’s comments that the SSSI features could be negatively impacted by light spill, particularly from the proposed lit path network running close to the reservoir’s edge. We suggest that this also applies to areas within the LNR and SMINC.

We recommend that a lighting strategy is developed as part of the proposals, with specific reference to reducing its impact on biodiversity (especially bats, birds, moths and amphibians). As a minimum we recommend that a lit circulatory path for safe and secure access is designed for the main part of the Playing Fields (with bespoke, unidirectional, movement sensitive lighting), but that some paths are deliberately unlit (for example, those near to the reservoir) to protect the site’s nocturnal biodiversity. The Trust would be keen to assist in this aspect of the masterplan going forward.

**Bird hides**

We note the proposed two hides, just south-east of the bowling green. Whilst this is probably an indicative location, we recommend that being in the wet woodland is neither feasible or desirable, and that further consideration is given as to where any hides could be installed (for example, on the eastern side of the reservoir), following further discussions linked to the SSSI mitigation strategy of the West HHhHGendon regeneration. The Trust is happy to contribute to this, in liaison with Natural England & Canal & River Trust.

**Paths**

We note the desire to improve the quality of the existing path network. We recommend that this should be undertaken sensitively to retain an informal feel of the site, and reduce non-porous hard-surfacing to the very minimum (and outside the LNR/SMINC). Some paths near to the reservoir require upgrading, but with a design and structure that is naturalistic, retains porosity, avoids sensitive areas of habitat, and that can be easily maintained (for example tamped hoggins).

As for the proposed cycle-paths, we do not support these being hard-surfaced within the SSSI/LNR/SMINC (as also suggested by Natural England). At a suggested 3m width these would result in the loss of existing vegetation for which would need to be mitigated for. In this respect a more detailed pedestrian access & cycling design strategy should be developed to set out how this can be implemented without adverse impacts on the site’s ecological sensitivities.

**Car-parking**

We welcome the use of permeable surfacing and planting to enhance the car-parks. Nevertheless, the creation of new car-parking areas will result in a net loss of grassland, which should be mitigated where possible.

**Biodiversity Net Gain**

The new features and facilities proposed for the Playing Fields represent a significant upgrade and intensification of development on the area. Whilst this is in keeping with the desire to improve the recreational offer for the borough - which in principle the Trust acknowledges - even with some further refinements to the design to minimise its ecological impacts at some key points, there is likely to be a net biodiversity impact. At present this is likely to be negative, although it may be reduced through some of the measures we have recommended.

The Preliminary Ecological Appraisal (MKA Ecology, September 2018) notes: “*The Site provides several exciting opportunities for biodiversity enhancement, including* *the retention of existing green infrastructure and the enhancement of habitat corridors to improve connectivity across the Site and the wider surrounding area*.” We also support all of the recommendations made in the Appraisal.

The proposals should not result in a net biodiversity loss to the site, let alone adverse impacts to the SSSI, LNR and/or the SMINC. The Trust recommends, given the scale and location of the proposals, that a specific commitment is made as part of the final plan to deliver a detailed **biodiversity net gain package**. This can be through a combination of measures to offset land take and adverse impacts on features, specific design features, and strategies on access, lighting and future operations that demonstrate an ecological sensitivity is effectively embedded, so that the Playing Fields can complement and add value to the ecological assets of the Welsh Harp SSSI, LNR and SMINC.

**Future site operations and management**

A key concern that the Trust has raised in respect of the Welsh Harp Reservoir environs is the lack of a coordinated and consistent management approach to the land. This is exacerbated by multiple landowners, sensitivities over the SSSI designation, and the split of a significant part of the wider site across the two local authorities. Whilst the Playing Fields fall entirely within LB Barnet, their future management should aim to be sensitive to the ecological designations that fall within the area, and ideally help to shape a longer-term management philosophy for the wider Welsh Harp environs.

We recognise that this will require alignment with the development of a clearer vision for the Welsh Harp (which includes the Playing Fields), which the Trust has been advocating with a number of local partners, including both local authorities. If we can secure an agreed vision for the Welsh Harp by the end of 2019, then this can inform the development of a management specification for the Playing Fields that can help to deliver environmental gains for the wider site. The Trust would be keen to assist in this aspect of the masterplan going forward.