West Hendon Playing Fields - Master Plan 3 Consultation (July 2019)

1. NW LONDON RSPB GROUP: Members of the N W LONDON RSPB GROUP are disconcerted that the advice and recommendations made in our previous response to Master Plan 2 (November 2018) do not appear to be adequately reflected in the latest Master Plan 3 Consultation (July 2019).

2. Slight change: We note however the revised location of the Skate Park from Cool Oak Lane and the re-positioning of the Tennis Courts - now no longer sited within the Local Nature Reserve / SSSI.

3. Intensification: The proposed intensification and commercialisation of West Hendon Playing Fields will still have a detrimental effect on the area’s biodiversity by encroaching on the Local Nature Reserve (LNR) and especially the Site of Special Scientific Interest (SSSI) and decreasing the buffer zone separating intense human activity from the Nature Reserve’s varied habitats.

4. Detrimental Affect: Barnet Borough is seeking to maximise the use of West Hendon Playing Fields to the detriment of wildlife and ordinary informal recreational users of the public open space.

5. National Important Site: Barnet Council in commissioning this consultation seem to have overlooked the fact that the Brent Reservoir SSSI is of national importance and the Welsh Harp / Brent Reservoir Local Nature Reserve extends into and across the defined area under review. The Local Authority should be mindful of its duty to protect and enhance the SSSI including the SSSI buffer zone.

6. Design: The design seems to cram every kind of activity into the available space once the excessive number of football pitches has been catered for. In doing so an additional grass field is lost to informal recreation in favour of yet more football. The revised configuration reduces the physical buffer zones that protect the Nature Reserve from excessive human pressure and encroaches on the Nature Reserve encompassing 2 (two) existing mature trees!

7. Football Pitch Rubbish: Football pitch uses and supporters should be made responsible for their rubbish and clearing up should be a condition of hire.

8. Artificial Pitches: Including two all-weather pitches will decrease the area available for open foraging grassland species (Gulls, Corvides, Starlings, Thrushes, Wagtails, Chats, etc.) diminishing overall biodiversity.

9. Wildlife Corridor: The West Hendon playing fields are part of a wildlife corridor connecting other designated sites in the wider landscape such as Fryent Country Park.

10. Biodiversity: The plan seems to ignore the site's obvious nature conservation interest and indeed if implemented will have a negative impact on the Local Nature Reserve (LNR) and Site of Special Scientific Interest (SSSI). Planning law requires schemes to protect and enhance biodiversity and show an actual biodiversity gain.

11. Climate Change: Scientists are warning that we must reduce emissions and increase carbon capture. Introducing more man-made structures at the expense of natural habitats will only aggravate the situation and is contrary to the Mayor of London’s Environment Strategy.

12. Bird Hides: The plan includes two bird hides (exact position not yet established). These could be used for viewing new Kingfisher & Sand Martin Banks but the construction and siting of the banks and bird hides would need to be agreed with the local conservationists and Natural England. Careful consideration needs to be given to their construction, continued maintenance and access to avoid the observation hides becoming targets for unsocial behaviour.

13. Pond: Adjacent to Activity 5 (Mini Golf) on plan is a crescent shaped pond. This pond should be designed to be amphibian friendly (no fish or exotic species) with at least two thirds of the perimeter made inaccessible to casual human disturbance. The area currently designated for Activity 5 should be set aside for the terrestrial life cycle of native amphibians.  A wildlife refuge / breeding island should be incorporated into the pond.

14. Hedgerows: Many of the existing hedgerows (some classified as Ancient) have become less effective in providing wildlife with safe feeding, roosting, and breeding opportunities. Supplemental planting with native bio-secure trees and shrubs to close gaps would be beneficial. Additionally, new hedgerows should be established beside paths and field boundaries to provide a legacy for future generations.

15. Coach Drop off Point: Cool Oak Lane is very narrow with sharp Z bends, width and weight restrictions, making it unsuitable for large vehicles including coaches, creating a lay-by on the narrow Cool Oak Lane is therefore ill conceived and will encourage more fly tipping in an area already subject to excessive littering etc.

16. Litter: Despite the valiant efforts of the volunteer litter-pickers, the area is often strewn with thoughtlessly discarded bottles, beer cans and other rubbish. This is particularly so after weekend sports matches, when discarded plastic bottles and take-away food wrappers and containers can be found scattered over large areas. The few litter bins provided are not optimally positioned and are often overflowing well before the council gets around to emptying them. Stimulating greater leisure use of the site will exacerbate this litter problem unless strict enforcement measures are introduced. This applies equally to dog mess.

17. Pollution: Discarded rubbish naturally gravitates towards the open water and increases to the rubbish already deposited by the Silk Stream. This consultation exercise has failed to address this problem. The Environment Agency / Barnet Council should be ashamed of the condition of the water and be making strenuous efforts to clear the enormous amount of accumulated rubbish. Addressing this problem should be a priority.

18. High Ropes Area: The siting of a proposed High Ropes Area in a wooded area of the Nature Reserve is inappropriate and will destroy the habitat and the species that rely upon it. Although there are examples of such activity in large country parks (often to the detriment of wildlife), this specially planted woodland was intended to enhance the biodiversity of the Nature Reserve not to become a commercial playground.

19. Flood Lights: illuminating artificial pitches have potential to illuminate trees and hedgerows used by commuting bats and other nocturnal species negatively impact on European Protected Species (EPS) in close proximity to the LNR and SSSI.

20. Paths / Cycle Routes: Many new pedestrian routes and combined pedestrian/cycle routes go through the LNR and the SSSI some illuminated. This will result in significant loss of habitat and bring light and noise disturbance to sensitive areas. This is unacceptable. We would only recommend the retention and if necessary upgrading on the existing path along the northern reservoir

21. Cycle Routes: Our only reservation is that if the paths are upgraded it may encourage high speed cycling triggering conflict and even serious injury.

22. Skate Park: For the same reason, we have reservations concerning incorporating skating activity across pedestrian paths.

23. New Community Building: The new Community Hub is more than double the foot print of the existing building which is contrary to Barnet’s Policy, See 16.2.3 New and Replacement buildings should be to a high standard of sustainability and work with the proposed WSUDs (Water Sensitive Urban Design), For example, rainwater and grey water capture and reuse, bio solar roof, vegetated walls to insulate, provide additional wildlife habitat as well as better integrating the building into its surroundings than the building it will replace.

24. Commercialisation: Many of the activities will require maintenance, supervision and out of hours security to prevent damage and unsocial behaviour. Who will meet these costs without commercialisation of the facilities?

 25. National Planning Policy Framework: NPPF requires the Planning Authority to ensure that not only is the existing biodiversity interest secured (especially in view of the site’s SSSI designation) but that there should also be a biodiversity gain. This scheme fails to satisfy this requirement.

26. The foregoing comments have been produced in consultation with the Welsh Harp Conservation Group and London Wildlife Trust - Barnet Group. These organisations may raise additional points which should also heeded.

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NW LONDON RSPB GROUP

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