

OBJECTION

PREAMBLE

We do not object to the overall concept, but we do object to multiple aspects of the application as detailed below. We consider that it should be possible to address all of our points in a revised application.

The plans presented in the current application will not meet many of the declared objectives of the applicant, nor are 'route maps' for achieving the objectives described, with multiple objectives variously ignored altogether, skated over, or presented without any supporting methodology.

We note that we could find no reference to a proposal for a BMX track in the Highgate Neighbourhood Plan, although the applicant states that it is in the Plan. If the Plan is silent on the BMX track specifically on that site, then HNP, Haringey, GLA and NPPF policies apply as well as the Site Allocation.

On the consultation on the BMX track proposals that have actually been brought forward, we note that most of the comments on Haringey's planning website are negative.

COMMENTS

Our comments cover

- Ecology
- Trees
- ASB
- Toilet Facilities
- Safety and Landscaping
- Signage
- Maintenance
- Seating and Litter
- Character of Conservation Area

ECOLOGY

The application makes a number of similar general statements such as "preserving local wildlife" and "both ecologically and socially sustainable", but there are no details of what is to be preserved or how and how ecological sustainability will be achieved given what will inevitably be extensive work to install the BMX track and the greatly increased noise and disturbance in the area of the track.

As a general point, we note that there are few remaining areas of Highgate as with much of urban London which retain a more natural and relatively unmanaged biodiversity. This

increases the overall value of the BMX track location and of its adjacent area stretching down to Priory Gardens.

We also note that the Capital Ring runs down the path to Priory Gardens.

The Preliminary Ecological Assessment makes particular note of the potential of the site for bats, stag beetles, and for birds generally.

This document also makes a number of recommendations to preserve and enhance the ecology. However, not one of the recommendations is responded to with details in the application.

The Preliminary Ecological Assessment states: "Once detailed plans are known, we will produce an EcIA report for the proposed development to support the forthcoming planning application." This has not been done.

Additionally, the EcIA document: "will fully evaluate the nature conservation value of ecological features present at the application Site, assess the significance of the effects of the proposed development on these features, and set out confirmed mitigation and enhancement measures." This evaluation must be an absolute requirement of any approval of proposals in this location.

It is essential both that the EcIA report is prepared and submitted for public comment as part of a revised application, and that the revised application includes detailed methodology as indicated in the Preliminary Ecological Assessment. This information and commitments are crucial to the concept of developing the BMX track in an ecologically-valuable area, and cannot be left to conditions.

TREES

The trees on site are highly significant, not just for their contribution to character, and to greening of both the local area and of one of London's major traffic routes, but as the foundation for the ecology of this area of land. It is therefore a major omission that there is no method statement for how the movements of significant volumes and weights of earth and the construction materials described will be achieved while respecting the RPA of the trees on site.

This issue was also raised in the pre-app note, so the omission of detailed methodology is not acceptable.

ASB

The applicants state: "There is no change in use of the land and it is hoped that the formalisation of the space will result in reduced potential anti social behaviour." Experience from elsewhere suggests that there is highly likely to be ASB such as graffiti painting on adjacent walls such as the perimeter wall of the library, the bench, litter bins, and equally likely, the library building itself including hard to reach but visible areas higher on the building. At Alexandra Palace, a large graffiti wall has always been present alongside the skate facility to deter graffiti and tag spraying elsewhere.

We note that anti-graffiti treatments of brickwork are not recommended by heritage organisations, and that removing sprayed paint from tree bark by high pressure jets is more damaging to trees than simply leaving it.

The pre-app notes state: "Please outline levels of noise and type of noise expected as well and times of operation (as expected, given this will be a specie open to the public at all times)."

Have the local police been consulted? There have been numerous phone thefts from pedestrians and particularly from young people in streets near the tube for instance.

This issue needs to be discussed.

TOILET FACILITIES

A well-used BMX track will generate a need for toilet facilities. Arrangements should be explored with both the library and Jackson Lane Theatre. If either organisation requires additional financial support for the provision, then long-term funding needs to be built into the proposal. Signage giving details and opening times of nearby toilet facilities would be needed near the entrances to the track area. Without such provision, the areas of trees and vegetation adjacent to the BMX track are likely to become unpleasant due to use for this purpose. There is also the potential for this site for children to attract undesirable attention even notoriety for predatory behaviour.

This issue needs to be resolved with firm solutions.

SAFETY AND LANDSCAPING

The proposals describe the retention of perimeter vegetation, making the following statements (Heritage Statement Rev. F):

- "The site is surrounded by bushes, trees and greenery, which remain unchanged."
- "All retaining walls and existing greenery is being retained and protected. There is no tree removal and shrubs remain all around the boundary of the site."

The Site Plans titled Existing and Proposed Overview also show in detail that existing vegetation will be retained.

However, we note that several years ago, much of the perimeter vegetation was removed in order to improve views into the site for reasons of public safety. This pressure is likely to be all the greater where the site is a widely-recognised and well-used facility for children and young people.

Indeed, elsewhere, the applicants state: "Sight lines will be improved as less overgrowth will take place. Please refer to maintenance section." (Design and Access Statement, Rev. D). However, the maintenance section mentioned consists of just 3 sentences seemingly referring only to 6 monthly visits to check the track. There is no detail given of the maintenance of the vegetation and ecology other than saying that TCV will be involved. We note that the latter would require funding and a clear plan, the former not mentioned and presumably absent, and the latter absent.

We consider the bland statements made in the Heritage Statement may turn out to be at odds with the practicalities of operating an open access public facility for children and young people.

This issue needs detailed and convincing discussion.

SIGNAGE

We note that the pre-app document states: "Any signage associated with the development would require a separate application for advertisement consent."

Although standard council signage is proposed, we consider that the design and colours of signage should reflect the fact that the genesis and development of this proposal together with its funding came not from the council but from the Highgate Neighbourhood Forum, which is Haringey's first Neighbourhood Forum and the result of a long process of public engagement supported by funding from government agencies and local organisations.

MAINTENANCE

The application describes long-term investment. What does this mean, from what sources, when, and over what time-scale?

The pre-app notes state: "A maintenance pls for the site and the proposed facilities should be clearly set out in a statement."

The pre-app notes also draw attention to the need to consider possible impacts on the setting of the listed building - Jacksons Lane - and the Highgate Conservation Area. Although elevation drawings are provided, there is no discussion of any impacts. The main impact is likely to be poor maintenance, leading to poor appearance, the avoidance of which would rely on secured funding over, say, a 20 year period.

The application states: "The green spaces will be further cared for, there will be opportunities for enhanced knowledge about habitats and local species."

There is no further explanation of what is envisaged, and how this will be provided. Without those details, this sort of bland statement is no more than green window dressing and wishful thinking.

The application states: "The project will be both ecologically and socially sustainable. The project responds to the council policy of promoting healthy living, it promotes spending time in nature. The council's environmental officer has taken part in initial, conversations. The nature conservation officer will help manage the space; TCV – The Community Voluntary Charity will be involved providing regular workshops, such as for making bird box etc. Council policy of getting children more active and knowledgeable about nature has been a driver for this project as well as creating a multigenerational space also for older people."

What is meant by the last sentence, and what is proposed for older people?

Without firm, long-term commitments from the people and organisations mentioned, this is meaningless. This green space has been used informally by young people since 1985, while the extension of the wooded area down to the old station and Priory Gardens has been there for a century without management by the council's parks service or the Nature Conservation Officer. TCV require funding for all their work. What funding will support the changes in management suggested? Where is any suggestion of a management plan for the ecology?

CYCLE PARKING, SEATING AND LITTER

There is currently one bench located against the perimeter wall of the library. One or more additional seats with litter bins will almost certainly be needed.

The pre-app notes states that the location and details of visitor cycle parking facilities should be shown on the plan. This has not been done.

CHARACTER OF CONSERVATION AREA

The application states: "The proposal is in general accordance with ... CSV 5: Preserve or enhance the character of the Conservation Area", Heritage Statement Rev. F).

The policy basis that the above statement has to meet is the General Character of the Shepherd's Hill sub-area which is described in the Conservation Area Appraisal (8.2.1) in this way: "Shepherd's Hill has a cohesive character by virtue of the predominant 19th/early 20th Century 3-story detached houses, the station-side copse to the north, the allotments to the south, the leafy gardens, and the regularly spaced mature trees on both sides of the road.". In its summary the Appraisal asserts that: "Further loss of features and architectural details would detract from the overall character and appearance of the conservation area and should be resisted."

We believe the points we have raised above should be addressed in a revised, new application.

In summary, for all of the above reasons, Highgate CAAC believes the present application will harm the Highgate Conservation Area and must be refused.