

Mallinson Sports Centre HGY/2023/0338

The supporting documents submitted for this application are inadequate and no decision should be made until a more thorough and clearer Biological Net Gain calculation has been submitted, supported by a thorough Ecological Survey and assessment of Bio-Diversity Net Gain. Preferably an independent consultant should be used, paid for by the applicant. The Council's Nature Conservation Officer should assess whether the proposals are acceptable.

Indeed the documents for Bio-Diversity, the environment and landscaping seemed very confused and it is difficult to distinguish between them. This makes it difficult to comment coherently.

The BNG report is difficult to follow and would have been made easier if a clearly marked map of the existing habitats were presented along, with a map of the proposed habitats.

One assessment has been made for an arbitrary square which, while it covers the whole of the Mallinson site, also includes part of the Richardson site, part of the Junior and Pre-Prep school site and the road between them. This totally skews any calculations or conclusions drawn from it.

The baseline assessment starts from the current time. The school has removed trees from the site, with more or less justification, within the last few years. It has also replaced grass with swathes of all weather surface. There is no mention of the small wild life area which was destroyed and built over, to build the recent Pre-Prep extension. The estate has not been managed prioritising habitat and ecology, and many areas have been maintained at a low level of bio-diversity or degraded, rather than improved and enhanced.

There has been no assessment of the drainage effects of the proposed project, neither on the existing trees, hedgerows, shrubs and open land, nor on the new planting for the planned landscaping

There is no mention of the existing hedgerows, not only the complete hedgerow leading to and merging with the copse, but also the hedgerow around the field with the rifle range.

There is no mention of the little streams and wetlands which are in and around the copse and there is no mention of the copse itself.

There is no detail on flora and fauna particularly bats, whose numbers in Highgate have decreased significantly over the years.

The two small 'habitat enhancement areas' marked on the Mallinson area of the map, already have relatively rich habitats and it is unclear how they are to be enhanced.

Some of the new 'species rich' hedgerows marked to be planted, already exist in degraded form.

There is no detail of the proposed planting species, or the width of the new hedgerows..

The assessment of Bio-Diversity is to be found in the Landscape Strategy Report part 3.

There is no assessment of whether the new planting is compatible with the changed hydrology and drainage of the area.

The GRO Code 14 green roofs lack ambition. 80 mms of soil will support sedums but for greater biodiversity 100mms, or better still 150mms soil depth is needed. This will also absorb more rainwater

It would seem that uplighting is to be installed under the trees. Under the guidance, this should be avoided. Also tree planting should give consideration to bat flight lines.

It is unclear why the wildlife pond has been placed where it has, when there is a part culverted channel running along the boundary of the copse.



Presumably it fed the pond which is marked on the 1869 Ordnance Survey 25 inch map, just to the north of the proposed pond. (top centre of the photograph) Why not reinstate the original pond.

The greatest effect of these proposals would be on the copse area. While the area proposed for felling is relatively poor quality, nevertheless there is an underlayer, of the type found at a woodland edge, which provides habitat for wildlife.



The whole area is waterlogged, once again providing habitat for both vascular and non-vascular plants.



It would be surprising if there were no frogs and toads and it is significant that greater crested newts have been seen in the garden of a neighbour house overlooking this area.

Permission has already been given this year to fell a diseased sycamore, a group of 'dying trees', unspecified and to monolith a group of 'dead and dying' yews. HGY/2025/3388. This is in addition to trees felled earlier last year. Replacement trees to mitigate those losses should be considered separately.

The fact is, that this landscape plan lacks ambition. The ecological assessment of the site, merely draws attention to a previous lack of interest in the ecology of the estate which is one of the largest areas of unbuilt land in Highgate. It is designated 'an established Open Space' in the Highgate Neighbourhood Plan and is part of the green network. We would like to see a great emphasis on contributing to the Ecological stepping stones and corridors in the area.

Weight should be given to:

NATIONAL PLANNING POLICY FRAMEWORK AND PRACTICE GUIDANCE

Chapter 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing existing sites of biodiversity value;
- minimising impacts on and providing net gains for biodiversity; and,
- establishing coherent ecological networks.

London Plan including the Mayors updates on urban greening.

- All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its:
- Contributions to wild life and ecological habitats and, where possible include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities

SPG 8d: Biodiversity, Landscaping and Trees

Highgate Neighbourhood Plan

Policy OS4: Biodiversity and Highgate's Green Grid

Development should support the ability of 'Highgate's Green Grid' (detailed in Appendix 3) to act as an element in the local ecological network

Louise Lewis

for Highgate Neighbourhood forum