

From: Cyril Meadows

The extracts from the planning application are in regular font, my comments are in italics

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HGY/2023/1208

Proposal

'The upgrading of a current make shift BMX trail into permanent trail for children of all ages.'

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Highgate Conservation Area

The idea of Conservation Areas is to conserve the architectural and natural heritage of the areas and ensure that all developments are carried out so as to fit in with the existing character of the areas. The present Highgate Neighbourhood Forum (NF) planning application is for a BMX track in the Highgate Conservation Area.

My objection to this application is based on the unsuitability of the Highgate Library copse for a BMX track for conservation reasons, for practical and technical reasons, and because there are more appropriate locations for a BMX track in Haringey and in Camden, including some outside the HNF boundaries. Obvious suitable locations for BMX facilities would be Highgate Wood, Priory Park, and the New River Sports Centre in Haringey; Waterlow Park and Parliament Hill Field in Camden.

Conservation and Social Considerations

- 1) The Highgate Library copse is a green open space of ecological and arboricultural importance which has been enjoyed as a community asset for over 100 years.*
- 2) The copse is designated as Metropolitan Open Land (MOL) and is part of the Capital Ring Walk established 20 years ago at the instigation of Nicky Gavron, former Haringey Councillor and Deputy Mayor of London. It is also a Site of Importance for Nature Conservation (SINC).*
- 3) The copse is an integral part of the setting of the 1902 Arts and Crafts Highgate Library which is a locally listed building contributing to the special character of the Conservation Area. The Library was refurbished by Haringey Council in 2024 at a cost of over half a million pounds.*
- 4) Before the degradation described below, the copse and the Library together offered the local community calm places for study, relaxation, open-air socialising, and visual delight which are important for people's well-being, especially for those who have no gardens and who work in noisy and polluted conditions. Therefore the copse should be restored to its former state.*

Technical/Practical Considerations

- 1) British Cycling, the official Sport England governing body for BMX, advises that the minimum space for a BMX track is 20 x 40 metres = 800 sq. metres. The scheme in this application does not meet this requirement.*

- 2) *British Cycling also recommends that BMX tracks be installed inside existing parks and sports facilities. The Highgate Library copse is neither an existing park nor a sports facility.*
- 3) *There is no information in the application on arrangements for lavatories or other facilities, hours of access, cycle or car parking, and security.*
- 4) *A BMX track in the Highgate Library copse could well become a 'destination' facility attracting parents who might bring children by car to a location with no parking facilities and thereby add to the already congested traffic situation at the junction of Archway Road and Shepherds Hill.*
- 5) *A BMX track at Highgate Library would require a high level of maintenance and monitoring. There is nothing in the application about how this would be organised and funded.*

Rationale for the scheme in this Planning Application

The rationale for this proposed project appears to be twofold: 1) that there aren't enough formal play areas for Highgate young people 2) the Highgate Library copse is under-used.

1) Play and Sports Facilities Available for Highgate Young People

*The young people of Highgate are well provided for in terms of play areas and sporting facilities easily accessible by a short walk, **bike** ride or bus ride e.g. in Haringey - children's playgrounds in Highgate Wood and Priory Park; tennis in Priory Park; swimming at Park Road pool; skateboarding and ice-skating at Alexandra Palace; athletics, gymnastics, open-air and indoor tennis at New River Sports Centre; in Camden and Islington - children's playgrounds and tennis in Waterlow Park; gymnastics and swimming at Archway Leisure Centre; athletics, cricket, football, tennis, rounders, swimming, cross-country running, and orienteering at Parliament Hill Field.*

But there is always room for improvement, and the provision of facilities for additional sports such as basketball, boxing, judo, hockey, or BMX in some of the locations listed above would enhance the recreational opportunities for Highgate young people. Given the widespread concern about the mental and physical health of young people today, the more opportunities the Council offers for sporting and open-air activities the better it will be for our young people.

Planning applications initiated by the Highgate Neighbourhood Forum are necessarily limited to sites within the Camden and Haringey Highgate Wards and therefore cannot take into account the wider context indicated above.

2) Vandalism and fly-tipping in Highgate Library copse

Although there are those who argue that the copse is currently used for BMX activities residents who pass by the copse regularly have noticed little or no such activity in recent times. The copse has been made unusable for other recreational purposes as a consequence of the vandalism that has destroyed trees and other vegetation, the fly-tipping, and the unauthorised building of dangerous earthworks. It has become a place to be avoided by the general public.

Detailed comments on:

- **Description**

This planning application is for the upgrading of a current make shift BMX trail into permanent trail for children of all ages.

COMMENT There is confusion about the target age-range for the BMX track. See Pre-Application Advice: It is understood that the proposed user group for the facility is 11-16 years.

This area of Highgate, Haringey, has a lack of formal play areas, but has large areas of open green space including ancient woodlands and disused railway track now used as a green route.'

COMMENT There is no lack of formal play areas in or near Highgate, all easily accessible by any young person who has a bike.

The site is located in the Highgate Conservation Area. It lies on a vacant piece of land which is currently used as an informal bike adventure park.

COMMENT The phrase 'an informal bike adventure park' suggests more than just BMX activities - compare the Description above: 'a current make shift BMX trail'.

The site is owned by TfL and leased to Haringey. The area has a well organised and active resident's forum, Highgate Neighbourhood Forum (HNF), that have identified areas that could be improved to include formalised play including a BMX track that has been created informally by local young people and families.

COMMENT The so-called 'BMX track' that has been 'created informally' was made by people acting unlawfully, causing damage to the trees and other vegetation, and carrying out earth-moving operations that have left the site unsafe and unpleasant for the general public to use.

It is not clear what is meant by 'to include formalised play including a BMX track'. Will there be some other form of play as well as BMX?

The project will be a long-term investment, transforming a currently neglected space into an attractive active pocket park. The aim is to enrich the public realm whilst preserving local wildlife. This will benefit the community whilst keeping the character of the conservation area.

COMMENT This site has been neglected for years by the Council who have taken no action on the fly-tipping, and it has become unattractive as the result of the earth-moving operations mentioned above.

Pocket parks are normally seen as calm, green open spaces, accessible to everybody in the community, and offering opportunities for people to relax and connect with nature; they are not generally viewed as venues for sports activities.

This project would deprive the community of a valued green space asset by covering a large part of it with a 100mm layer of limestone, granite and other materials to form a hard sealed surface for the purpose of change of use to a BMX track. This would have a seriously adverse impact on the character of the Conservation Area.

Site Area: 564 sq. m

Scheme Name: Highgate BMX Track

Projected cost of works: Up to £2m

COMMENT In December 2023 FORE (Friends of Reading and Education) were informed by the Council that the 2024-2025 library budget would have to be reduced by £700,000 and that similar savings would be required going forward into 2025-2026. Yet the Council is proposing to spend £2 million on concreting over 564 sq. metres of historic green space at a time of financial crisis when all nine Haringey libraries have had their opening hours severely reduced. This doesn't make any sense.

Existing Use

The site is located in the Highgate Conservation Area. It lies on a vacant piece of land, which is currently used as an informal bike adventure park, which started in the 1980's. The tracks have been made by members of the public and altered by biking enthusiasts. The site also has a footpath going through which the general public use to walk through on their daily commutes.

COMMENT The site doesn't look like 'a bike adventure park' to me, it looks more like a piece of derelict land with unsightly earthworks and a lot of rubbish.

This section appears to accept that making BMX tracks on a piece of green woodland without the Council's permission was a laudable action. Would it be OK for members of the public to start digging up green spaces across the Borough without planning permission?

The site is currently used informally as a BMX track and has a pedestrian path at the edge of the site.

COMMENT Residents living near the copse have seen little sign of the site being 'used informally as a BMX track' in recent years.

Existing and Proposed Uses

Vehicle Parking

Does the site have any existing vehicle/cycle parking spaces or will the proposed development add/remove any parking spaces?

Yes

No

COMMENT The lack of parking spaces could be problematical if the BMX track became a 'destination'.

Open and Protected Space

Please note: This question is specific to applications within Greater London.

The Mayor can request relevant information about spatial planning in Greater London under [Section 346 of the Greater London Authority Act 1999](#).

[View more information on the collection of this additional data and assistance with providing an accurate response.](#)

Open Space

Will the proposed development result in the loss, gain or change of use of any open space?

Yes

No

COMMENT This answer is not correct. Building a BMX track on the Highgate Library copse would be a change of use and would result in the loss of 564 sq. m. of public amenity land.

Pre-application Advice

Details of the pre-application advice received

The following points are made by Officers in response to the plans submitted and discussions at the pre-application meeting.

- Principle of development:

Planning permission is required for the proposed works in accordance with the Town & Country Planning Act 1990 section 55(1)(d) 'other operations'.

The principle of the development is considered acceptable generally, however, this would be subject to full consultation results during the course of the application.

It is understood that the proposed user group for the facility is 11-16 years. For any application, please confirm this and elaborate including consultation responses from any other age groups.

A maintenance plan for the site and the proposed facilities should be clearly set out in a statement.

COMMENT The proposed user group here is 11-16 years whereas the proposal at the top of the planning application form is 'for children of all ages'.

There doesn't appear to be any statement of a maintenance plan or the proposed facilities in the application documents.

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Tibbalds - Highgate BMX Track

Planning Application Assessment 2024.09.25

1 Introduction

1.1 This note has been produced by Tibbalds Planning and Urban Design on behalf of Haringey Council (in their role as landowner / applicant) to assist with the determination of a planning application (ref. HGY/2023/1208) for 'the upgrading of a current makeshift BMX trail into permanent trail for children of all ages'. The application proposes to formalise an area to the south of Highgate underground station that is currently used as a makeshift BMX track into a purpose-built BMX track.

COMMENT Is the project for a 'permanent trail for children of all ages' or for 11-16 year-olds as shown in the Pre-application Advice? Would a purpose-built BMX track be suitable for pre-school children? Or 5-10 year-olds?

2 Planning Policy Assessment

2.1 The application site is covered by several site-specific planning designations including:

- Highgate Conservation Area;
- Site of Importance for Nature Conservation (SINC) (Metropolitan Grade);
- Ecological corridor;
- Metropolitan Open Land (MOL);

- Highgate Station Cutting; and
- Existing Green Chain.

2.4 Local Plan Policy SA39 states:

- This site is considered to be an underutilised asset. The Council's open space network will be enhanced through the opening up of this site for a range of community uses and improving the connection from the Parkland Walk through to Highgate Wood.

COMMENT The site is currently unusable by the general public as a result of fly-tipping and the dangerous earthworks. This planning application is not for 'the opening up of this site for a range of community uses' but for the construction of a BMX track. The footpath down the side of the Library is a perfectly adequate link for the Parkland Walk through to Highgate Wood and would be unaffected by the BMX project, so it is difficult to understand what 'improving the connection' might mean.

4 Recommendations

4.1 For the application to progress, the applicant will need to submit the following additional information to address planning policy requirements:

- An Arboricultural Impact Assessment to establish the value of the existing trees and to confirm the impact of the proposed development on them.
- An Ecological Impact Assessment that includes the following:
 - There will be no adverse impact on the ecological constraints due to the mitigation measures implemented.
 - There will be no adverse impact on the ecological connectivity of the site.

COMMENT Arboricultural and Ecological Impact Assessments have now been submitted, but there is no information about how the required protection and mitigation measures will be implemented or how they will be funded in the long-term. The fact that such measures will be needed shows the inadvisability of launching a BMX project on a site of arboricultural and ecological value.

Arboricultural Impact Assessment

Proposed development

1.3 The proposed development at *Land next to 1 Shepherds Hill* ('the Site' - see *Figure 1*) is for the upgrading of a current makeshift BMX trail into permanent trail for children of all ages ('the Proposed Development'), within the area administrated by *The London Borough of Haringey* ('the LPA').

COMMENT Is the proposed BMX trail for children of all ages or for teenagers? See Pre-application Advice.

2 SITE INFORMATION

Current Site use

2.1 The Site is located at the western end of Shepherds Hill and comprises a publicly accessible woodland area that is currently used informally for recreational purposes - the southern area of the Site is currently used informally for BMX-related activities (see *Figure 2 & Figure 3*), which the Proposed Development intends to formalise.

COMMENT The site of the Proposed Development has in the past been used for 'BMX-related activities' following unlawful earthwork operations involving damage to trees and other vegetation,

so the Development in fact intends to legalise rather than formalise an unauthorised development. Local residents have noticed little sign of recent 'BMX-related activities'.

3 TECHNICAL ARBORICULTURAL DETAILS

Visibility

3.2 The surveyed trees form part of the public realm and are all visible from the surrounding areas - as are they all visible from within the Site itself. The trees along the southern flank of the Site are considered to be the most valuable given their setting adjacent to a busy area of the public realm (see *Figure 5*), though generally the woodland as a whole is of significant value in terms of its public visual amenity.

COMMENT The trees and an overview of the copse are also visible from the Library.

5 ARBORICULTURAL IMPACT ASSESSMENT

Tree works

5.2 However, the western portion of a small shrub group (G29) does need to be removed, in order to facilitate the installation of one of the proposed ramps. This is considered to be of no particular importance in arboricultural terms, as the character of the woodland will not be diminished through the partial loss of this group. By extension, the visual character of the Highgate CA will be maintained.

COMMENT The last sentence is merely an assertion. A BMX track would not be invisible, for example it would be clearly seen (and heard) from the Library.

Construction of the BMX trail

5.9 The proposed BMX trail is mostly located within the area of the Site that is already subject to a more informal version of recreation for the same purpose - the Proposed Development intends to formalise the BMX trail so it retains a bespoke purpose for the long-term. On this basis, the fundamental usage of the Site within its southern area will not change and the on-going impact following its installation is considered to be minor (i.e., the trees will be subject to a low impact).

COMMENT The language used here attempts to give the impression that the project would merely confirm - 'formalise' - an existing and legitimate use of the site, suggesting that the site was and is just made for the particular purpose of use as a BMX trail i.e. that it has a 'bespoke' purpose. This is historically incorrect: the copse has been a green open-space public amenity for more than 100 years and is in no way a 'bespoke' BMX trail. The so-called 'informal BMX trail' - a collection of dangerous earthworks surrounded by bare earth stripped of all vegetation - is the result of people acting unlawfully, without recourse to the Council, without planning permission, and without consent for change of use.

Planning policy considerations

National policies

5.13 With regard to the relevant planning policies at this spatial scale (as per paragraph 4.1), the Proposed Development is considered to respond to these policies in the following manners:

- **Paragraph 136** - The Proposed Development is considered to have the capacity to retain all of the existing trees, incorporating them into the proposed layout of the Site with no diminishment of the underlying character of the woodland within it is situated.
- **Paragraph 187** - The Proposed Development is considered to maintain the public visual amenity benefits that are provided by the woodland in its current condition (i.e., there is no diminishment of its amenity value).

COMMENT A piece of woodland which has had a BMX track incorporated within it would be viewed by most ordinary people as having had its character and its amenity value diminished. If parents had been accustomed to taking their toddlers for an afternoon relaxing and playing in the copse, with the children perhaps riding tricycles or learning to ride a bicycle, how would they not regard the conversion of the copse into a BMX track as a loss of amenity?

6 CONCLUSIONS

6.1 Proposed Development has been prepared with the principle of retaining all of the existing early-mature and mature trees within the Site. On this basis, subject to involvement by the arboriculturist throughout the technical design stage of work associated with the preparation of the BMX trail and thereafter the provision of an AMS in response to a planning condition, it should be the case that the retained trees can be appropriately protected during the implementation of the Proposed Development. Through the retention and protection of trees within the Site, the visual character of the Highgate CA will be maintained.

COMMENT This assessment does not address the issue of the trees that were felled as part of the process of degrading the copse - notably the important Field Maple trees planted in 2002 to mark the centenary of Highgate Library. New trees should be planted to replace those felled. Retaining all the early-mature and mature trees now in the copse is not enough, and would not in itself maintain the visual character of the Conservation Area.

The BMX track would visually degrade the copse. The whole setting of Highgate Library with its garden and the copse nearby is a key feature of the Conservation Area, and the BMX track would be clearly visible from the Library.

6.2 Furthermore, it is considered that the Proposed Development does not involve a significant change in the use of the Site - rather, it formalises the usage of the existing BMX trail that is already in place. Therefore, the retained trees will not be subject to any particularly different degree of pressure that does not already exist. In this context, the Proposed Development is considered to relate well to trees - on the basis that works to implement it are undertaken using bespoke methods (that will need to be prepared as part of an AMS once designs are further refined).

COMMENT See my comment under 5.9 above. The assertion that the Proposed Development does not involve significant change of use is untrue.

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Ecological Impact Assessment (Shepherds Hill, Parkland Walk)

1. EXECUTIVE SUMMARY

The proposed development is for the construction of a sealed surface BMX track in place of a bare ground BMX track that is already present at the Site.

A number of ecological features and habitat designations are present that require specific measures to be put in place during the construction phase of the development in order to ensure compliance with legislation and policy. These are regularly encountered ecological constraints with standardised mitigation measures. All appropriate mitigation measures should be detailed in full within a Construction Environmental Management Plan (CEMP). Features that require mitigation works are:

- **Designated sites:** A number of mitigation measures will be put in place during the construction phase of the development so as to ensure that the integrity of Parkland Walk, Queen's Wood, and Highgate Wood Site of Importance for Nature Conservation (SINC) is maintained.

Connectivity of the SINC is not expected to be affected by the development. **No residual effects.**

- **Habitats of Principle Importance (HPI's):** A number of mitigation measures will be put in place during the construction phase of the development so as to ensure that the integrity of the Woodland HPI is maintained. **No residual effects.**
- **Invasive non-native species:** Sensitive removal of all instances of invasive plant species will be undertaken, with arisings disposed of as controlled waste. **Long-term minor positive effect.**
- **Invertebrates:** Removal of deadwood features and areas of bare ground are expected from the development. Construction phase mitigation and deadwood features will be installed at the Site as compensation along with areas of bare ground for invertebrates. **Long-term minor positive effect.**
- **Reptiles:** Any potential habitat or hibernacula clearance required should be undertaken under a destructive search methodology. **Long-term minor positive effect.**
- **Breeding birds:** Ground and vegetation clearance works will avoid the breeding bird season (March to August inclusive) or be preceded by a nesting bird check conducted by an experienced ornithologist. Bird boxes will be installed on trees. **Long-term minor positive effect.**
- **Foraging and commuting bats:** No trees will be removed during the development and no lighting is proposed. Site connectivity will be maintained. **No residual effects.**
- **Roosting bats:** No trees will be removed during the development and no lighting is proposed. Bat boxes will be installed on retained trees. **Long-term minor positive effect.**
- **Badgers:** The development will follow mitigation measures during the construction phase to insure no harm to this species. **No residual effects.**

Following the issue of the National Planning Policy Framework (NPPF), all planning decisions should aim to maintain and enhance, restore or add to biodiversity and geological conservation interests. A number of ecological enhancements will be implemented including the installation of bird and bat boxes, the creation of invertebrate habitat, and the provision of deadwood features.

COMMENT The proposed development would cover the 'bare ground BMX track' created unlawfully with a sealed surface BMX track, thereby making the degradation of the copse permanent and depriving the general public of the opportunity to use the space to relax, play with their children, and enjoy being in a pleasant open-air space i.e. to connect with nature far away from the stress and pollution of urban life.

Has the Construction Environmental Management Plan (CEMP) been prepared? Does it include details of how the biodiversity and geological conservation interests will be maintained, enhanced restored or added to? Does it give details of all the mitigation measures required?

10. CONCLUSIONS

Shepherds Hill, Parkland Walk comprises an informal bare ground BMX track surrounded by broadleaved deciduous woodland. The Site is part of the Parkland Walk, Queen's Wood and Highgate Wood SINC, which provides important connectivity and breeding habitats to protected species across the borough.

The ecological value of Shepherds Hill, Parkland Walk lies in its SINC designation, protected habitats and its provision of resources for roosting, foraging and commuting bats, breeding birds, invertebrates, and reptiles. The planned development will retain these habitats, although some loss of low-quality habitats, such as ephemeral vegetation and bramble scrub, may occur. Small scale removal and repurposing of potential invertebrate features and reptile hibernacula is anticipated. This is not expected to impact the features for which the SINC has been designated due to the extent of the development footprint and its low baseline biodiversity value.

The design of the proposals will ensure that the value of the Site for roosting, foraging, and commuting bats, breeding birds, invertebrates and reptiles is maintained and enhanced. Suitable mitigation will be put in place during construction to ensure that these species are not harmed or disturbed. The condition of the SINC and the HPI will be improved through the removal of invasive non-native species. Specific details for each species group will be included within a CEMP. The CEMP will also detail methodology in order to protect the Parkland Walk, Queen's Wood and Highgate Wood SINC from impacts in the construction phase. The proposals do not result in a change of use at the Site and as such the recreational pressures on the SINC and HPI from the development are not expected to change. Additionally, the proposals are not expected to have an impact on the connectivity of the HPI and SINC,

provided all mitigation measures are followed and trees are retained.

Numerous biodiversity enhancements will be implemented, including provision of nesting and roosting boxes for birds and bats, and the creation of new features for reptiles, amphibians and invertebrates. With careful and appropriate mitigation measures, the development will have no significant impacts on the ecological value of the Site, and once new ecological features have been established it will result in a minor improvement to the value of the area for the species that have been identified.

COMMENT The site did not 'comprise a bare ground BMX track' before the creators of the so-called BMX track devastated the site by removing vegetation and building dangerous and unsightly earthworks.

Why would the CEMP for this site need to detail methodology in order to protect Queen's Wood and Highgate Wood which are a considerable distance away from Shepherds Hill? Further information on this requirement should be made available.

The statement that 'The proposals do not result in a change of use at the Site' is not correct. See my comments at 5.9 above.

In my view these conclusions take an over-optimistic view of the likely impact of a heavily-used BMX track on the ecology of the site ('the recreational pressures on the SINC and HPI'). Basically, a BMX track and a woodland copse which is a SINC are incompatible if the ecology and the arboriculture of the copse are to be fully protected over the long term.

The promise of mitigation measures, e.g. nesting and roosting boxes for birds and bats, new features for reptiles, amphibians and invertebrates, is telling. How careful and appropriate would the mitigation measures be and how effective? Birds, for example, are unlikely to stay around to nest and roost in an area heavily used by noisy people.

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CONCLUDING COMMENTS

It is clear that the present application is based on a misunderstanding of the historic role of the Highgate Library copse as a green open space enjoyed by people of all backgrounds and ages for well over a century. The degradation of the copse - by fly-tipping, vandalism, and the unauthorised digging of earthworks to create what is variously described in the application documents as 'an informal bike adventure park', 'a makeshift BMX trail', and 'an area for general recreation activities' - has been seen as an opportunity to 'clean up' the site by installing a permanent BMX track which would amount to a change of the historic use of the site and to retrospective legalisation of the unlawful actions of the creators of the unsightly earthworks. Giving retrospective approval for an unlawful development would set an unfortunate precedent for future unlawful developments.

The argument that there is a shortage of play areas for the young people of Highgate is without foundation as demonstrated above. There is confusion in the application documents as to the age-range of the target users of the BMX track. It seems unlikely that pre-school children or many other children under 10 would be able to use a BMX track designed for teenagers. It is clear that there are a number of locations in or near Highgate which would be more appropriate for a BMX track and where the installation could be achieved at lower cost and without needing the arboricultural and ecological protection and mitigation measures specified in the Arboricultural and Ecological Impact Assessments.

The concern that the site is under-utilised reflects the fact that it has become an unpleasant and unsafe place for members of the general public to use. Installing a BMX track there would ensure that the copse would never again be the pleasant public amenity it used to be.

The Highgate Library copse should be restored to its former state as a beautiful green open space and thereby regain its historic place in the setting of the Library which is a major feature of Highgate Conservation Area.

This application should be refused.

Cyril Meadows
09 May 2025
20 Glasslyn Road N8 8RH