Date: 15 October 2015

Our ref: 166359

Your ref: HGY/2015/3000

FAO: Neil McClellan Planning and Building Control, 6th Floor, River Park House, 225 High Road, Wood Green, London, N22 8HQ



Customer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

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## BY EMAIL ONLY

Dear Mr McClellan,

**Planning consultation:** Proposed demolition and comprehensive phased redevelopment for stadium and other uses.

Location: White Hart Lane Stadium, Bill Nicholson Way, 748 High Road, Tottenham, N17 0AP.

Thank you for your consultation on the above dated 22 September 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Conservation of Habitats and Species Regulations 2010 (As amended) Wildlife And Countryside Act 1981 (As amended)

## White Hart Lane Redevelopment – No Objection

Due to the scale of development planned for this area there are many opportunities for improving the Green Infrastructure (GI) both locally and in the surrounds. Given the distance, being 1.2km to the north east of the Lee Valley Special Protection Area (SPA) and Ramsar and Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) there isn't any direct or indirect impact envisaged and as such no substantial comment beyond this response will be made.

As mentioned above with GI there is a big opportunity to prepare for climate change and the inevitable changes to weather patterns that will happen as a result. The inclusion of more porous surfaces, rain gardens, green and brown roofs and walls will help absorb more of the rain and hold it in situ rather than it going straight into the drains and contributing to flooding and sewer overflows into the Thames. The benefits to the general public in health terms are also not insignificant allied to the fact that creating green corridors can allow more effective movement of wildlife and an increase in biodiversity.

## **Birds**

Given the area in which this development is going on there could be some Black Redstart activity in the vicinity which would need to be taken into account when drawing up plans for the new stadium and its surrounds. As the nesting bird survey carried out last year identified nesting Starlings and a Kestrel nest both in active use the site has to ensure that suitable alternative habitat is included to allow these birds to continue to use the area.

Natural England is supportive of the inclusion of living roofs in all appropriate development.



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Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <a href="http://livingroofs.org">http://livingroofs.org</a> for a range of innovative solutions and <a href="http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf">http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf</a> (London GLA 2008) regarding the fit with the London Plan policy.

## **Protected species**

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter <u>only</u> please contact Piotr Behnke on 0300 060 1963. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Piotr Behnke Sustainable Development and Regulation Thames Valley Team

