



Graham Loveland  
Head of Planning  
Hackney Planning Service  
2 Hillman Street  
London E8 1FB

6 September 2012

Dear Graham Loveland,

### **Wilmer Place**

I am writing to oppose the proposed development at Wilmer Place. This will have a deleterious impact on Abney Park, which is one of the most important sites for bio-diversity and landscape history in London. I am writing in my capacity as a local resident, a member of Hackney Biodiversity Partnership, and also an academic specializing in urban environmental issues.

I want to raise five points in particular:

1. A unique site

At its completion in 1840 Abney Park combined a garden-cemetery with an elaborate arboretum and rosarium, that were unique in Europe at the time, and featured some 2,500 species of trees and shrubs from around the world. The design drew on prominent European cemeteries such as Père-Lachaise in Paris as well as the natural woodland setting of Mount Auburn Cemetery near Boston. The proposed development does not acknowledge the national and international significance of Abney Park in cultural, historical and bio-diversity terms.

2. Landscape history

The park provides a direct continuity with the rural landscapes that were fast disappearing at the edge of nineteenth-century London since the site incorporated an area once called “the Wilderness” along with seventeenth-century landscaped grounds.<sup>1</sup> These features of Abney Park form part of what the urban ecologist Ingo Kowarik terms “old urban nature” comprising

elements of the original landscape which have never been built on, and which have subsequently become a pivotal aspect to the ecological significance of the site.<sup>2</sup>

### 3. Hackney's first nature reserve

In the early 1990s the ecological significance of Abney Park was officially acknowledged for the first time and the site was designated as the first statutory Local Nature Reserve in the London Borough of Hackney, and it has subsequently been recognized as one of the most important sites for biodiversity in London. It is now recognized as a Site of Metropolitan Importance for Nature Conservation (SINC) with over 170 species of trees and shrubs, including some rare trees dating from the original Loddiges planting scheme of 1840. The reserve is nationally important for fungi (over 300 species have been recorded), rare beetles thrive on rotting wood (including nationally scarce species), and a remnant fauna of moths and butterflies persists (over a third of the UK butterfly species have been recorded along with over 200 species of moths).<sup>3</sup> The proposed development will present a threat to Abney Park from damage to tree roots, noise and persistent light pollution (which adversely affects bats, birds and night-flying insects).<sup>4</sup>

### 4. Environmental Impact Assessment

No Environmental Impact Assessment has been carried out as required under EIA Regulations (SI 293 1999). An adequate bio-diversity impact survey would take one year to complete since many key species are only observable at certain points over a twelve-month period. In order to assess the invertebrate fauna it would be necessary to employ a team of professional scientists to carry out the work and provide a full report. Additionally, a professional bay survey would take several months to complete, and would have to take into account the full range of habitats around the site.

### 5. Hackney's Biodiversity Action Plan

The proposed development would contradict Hackney's own Biodiversity Action Plan (BAP), published this year, which took over a year to complete, and involved a wide range of stakeholders across the borough. The Hackney BAP, written by the Hackney Biodiversity Partnership in collaboration with Hackney's outstanding Biodiversity Officer, Kate Mitchell, is an example of best practice for London Boroughs. It would be a shame if Hackney's public commitment towards bio-diversity and environmental education were to be irrevocably damaged by the proposed development.

If you require any further information please do not hesitate to get in touch.

Best wishes

Professor Matthew Gandy  
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- 1 See E. Walford, *Old and new London: a narrative of its history, its people, and its places* (Cassell, Petter and Galpin, London, Paris and New York, 1877).
- 2 I. Kowarik and S. Körner (eds.) *Wild urban woodlands: new perspectives on urban forestry* (Springer, New York, 2005).
- 3 Critical species of Lepidoptera recorded on the site include *Acasis viretata*, *Combibaena bajaeria*, *Lobophora halterata* and many others. Further information can be obtained from Greenspace Information for Greater London (GIGL) and from Hackney Biodiversity Partnership.
- 4 On the effects of light pollution see T. Longcore and C. Rich, "Ecological light pollution" *Frontiers in Ecology and the Environment* **2**(4) (2004) pp. 191–198.