

I am writing in response to your consultation on the inspector's table of main modifications to the core strategy following the examination in public and submitted to the Council on 22 August 2012.

I support the modification to SP8 made by the Inspector. However, it would be helpful if your report reflected the evidence given at the hearing by the Council, that the Pinkham Way site is not an established industrial site. I believe a statement to this effect would remove ambiguity as to the status of this Employment Land site and any confusion introduced by Haringey's attempts to re-designate it to industrial land at the request of NLWA. As I have made clear in my earlier response to the re-consultation on the fundamental changes to the Core Strategy, the attempt to re-designate the site was very obviously driven by a desire to ease a forthcoming planning application for the site, rather than being based on sound evidence based plan making. I am pleased the inspector has also recognised this.

I would welcome a statement in your report that the site is open space and that it is not brownfield/previously developed land because it is excluded from this definition under the London Plan and the NPPF definitions of previously developed land. Evidence was produced to support that at the inquiry which was not disputed by the Council.

I consider that the protection of the SINC status of the Pinkham Way site has been weakened. In the UDP it stated that development would be allowed on the site **provided there was no impact on the nature conservation value of the site**. This direct proviso has been delinked in the new strategy and reworded. I provided in my earlier response to the consultation on the re-designation of the site a long list of examples of how national and regional planning policy has been strengthened rather than weakened regarding the protection of London's remaining green spaces and the increased recognition of the importance of green corridors and connected green spaces in helping adapt to climate change. This strengthening of policy since the existing Local Plan was adopted should imply a strengthening of the protection of this site, not a weakening of its protection that Haringey have managed to introduce if the plan remains with its current wording. It is again very clear that this change has been made not on the basis of evidence (I understand from the enquiry that Haringey have not carried out any recent assessment of the ecological value of the site), but again to ease a planning application which would certainly fail if this clause remained in place. Again this is not robust plan making and could be challenged at judicial review.

The protection of the nature conservation value of the site should also reflect Haringey's biodiversity action plan, which identifies the opportunity to de-culvert the stream that runs through the Pinkham way site identifying this as one of few opportunities within Haringey to restore Haringey's waterways. This opportunity should be protected in the site's designation and the designation should state no development of the site will be permitted that would compromise the ability to de-culvert the stream that runs through the Pinkham Way site. Previous consultation responses by the EA on the core strategy have highlighted the need to protect this opportunity and it appears that these responses have been ignored both by Haringey and the inspector. I note that in a previous letter from NLWA to Haringey of 21 June 2010 (see page 10 of the attached) , NLWA asked that reference to this opportunity to de-culvert the stream be removed from the site's allocation. I would have thought the EA response would carry greater weight in this instance than a letter from the applicants for a forthcoming planning application, particularly as the applicants comment from page 10 of their letter re the North London Waste Plan is irrelevant as presumably the site could be developed in a way that allows de-culverting of the stream, but also because the NLWP was recently deemed unsound.

I would like to see unambiguous protection of SINCS within the Biodiversity Policy (rather than in the narrative to this policy). For example, in the policy box, after the

statement "All development shall protect and improve sites of biodiversity and nature conservation etc, add a fourth bullet point to the effect:

- "The Council will not permit development on SINC's and LNR's unless there are exceptional circumstances and where the importance of any development coming forward outweighs the nature conservation value of the site."

The rest of the modification, ie "in such circumstances" etc to remain in 6.3.23 as narrative.

I would like to suggest one further minor amendment to paragraph 6.3.23 – that the last sentence reads "SINC's within the borough include Bluebell Wood, Muswell Hill Golf Course, Former Friern Barnet Sewage Works (Pinkham Way), Hollickwood Park, Tottenham Cemetery and Bruce Castle Park." I suggest this because these first four SINC's are directly geographically linked to each other and it would be appropriate to mention them together. Dropping any one of them seems inappropriate.

Proposal Maps 7, 16 and 24 need changing to reflect your decision not to permit the redesignation to LSIS.

I hope these suggested amendments would make the Core Strategy more robust by helping dispel any future argument that changes to the plan have been unduly influenced by the desire to enable a planning application to proceed, rather than being based on a robust evidenced based plan, which clearly would have sought to strengthen the ecological protection of this site given the weight of National, and Regional policy and Haringey's own bio-diversity action plan and if Haringey had made any attempt to develop a recent understanding of its ecological value and its importance for the local area.

Yours faithfully

Miles Attenborough