

## Objection to the Framework Core Strategy – 22nd October 2011

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1. For the purposes of this objection statement, I am using the term Pinkham Wood as a substitute for the title Friern Barnet Sewage Works, N10 as used in the Framework Core Strategy. The use of the term “sewage works” is somewhat misleading since it is some 50 years since the site was a sewage works. The space is now a green space with no visible sign of the long gone sewage works.
2. It is my understanding that the point of the Core Strategy is to set out some key rules and principles by which future situations are considered and, accordingly, to facilitate decision making. The construction of the Core Strategy should be based on pure policymaking. It is clear however that Haringey Council has allowed the development of the Core Strategy to be compromised by the inclusion of specific elements and the desire to facilitate the building of a waste processing plant at Pinkham Wood. It should be noted that the particular requirement is clearly unacceptable to thousands of people in the locality.
3. Initially this was by extremely late amendments to the Core Strategy, amendments directly concerned with Pinkham Wood, with inadequate consultation. This was spotted by a diligent resident and representations (despite Council attempts to stop them) were made to the public examination of the Core Strategy. The Government Inspector subsequently declared that the Council was guilty of running a consultation that “could appear to be prejudicial to the interests of fairness and natural justice” and which does not meet the “necessary legal requirements”. We concur with his statement.

4. New Consultation

Haringey’s response to the criticism is no more acceptable than the previous effort. No attempt has been made to widen the constituency of the consultation and notification to interested parties has been very narrow. There is no explanation of the reasons for extra consultation in the covering letter sent out to registered consultees. The contentious policies relating to Pinkham Wood are buried in a 48 page consultation document. Notification of the consultation was not sent out until after the consultation has started (see date on Consultee’s Letter), effectively removing the best part of a week from the response period for those wishing to bring the matter to the attention of a wider audience. Many people, affected by this matter, will still be unaware of this consultation process.

5. Page 14 - Framework Core Strategy Consultation Document – September 2011

Haringey Council appears to want to designate Pinkham Wood as a Locally Significant Industrial Site (LSIS). In paragraph 5.1.10, it makes clear that LSIS “sites are well established industrial areas”. This is not the case at Pinkham Wood. The site was abandoned as a place of employment half a century ago. It has become a green space, a fact recognised by Haringey Council when it designated it as a site of Importance for Nature Conservation. The proposed new designation is wholly inappropriate and technically incorrect.

6. Page 22- Framework Core Strategy Consultation Document – September 2011

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The table on this page refers to Pinkham Wood (FBSW N10) UPD Number 6 (DEA6). The entry includes the cryptic comment – “Complies with pre-application”. The comment is wholly unexplained in the document but those aware of the furore regarding the NLWA’s plans will recognise this as a reference to an outline planning application from NLWA that was submitted but which has been subsequently withdrawn. The use of the term “complies” is inappropriate given its dictionary meaning “to act in accordance with another’s command request rule or wish”. Just because the site meets the needs of the NLWA does not mean that the site is actually suitable for the purpose being proposed, nor is this a justification in its own right for changing the land designation. The comment rather suggests that Haringey Council have prejudged the NLWA application and are making the change of land designation on the basis that ultimately it will be easier to agree to the NLWA application, notwithstanding the considerable local opposition to the NLWA plans. The NLWA pre-application appears to be the reason for changing the policy. The Council is, of course, a key member of the NLWA and therefore its independence is hugely questionable.

7. Page 34 - Framework Core Strategy Consultation Document – September 2011

The description of DEA 6 includes a reference to the North London Waste Plan. It does not make clear that considerable evidence has been offered to the impending Examination in Public in opposition to the choice of Pinkham Wood as a preferred location. Furthermore much of the evidence makes clear that the selection of Pinkham Wood as a preferred location is so inconsistent with the NLWP’s own published site selection criteria that it is unlikely that Pinkham Wood will be maintained as a preferred site following independent public scrutiny.

8. Page 34 - Framework Core Strategy Consultation Document – September 2011

In the consultation document, the expression of the “Change of Designation” is unclear and ambiguous. It is completely unclear from the consultation document whether the current designation of Pinkham Wood as a site of Importance for Nature Conservation will be maintained, indeed, the presentation of the change of designation for the site rather suggests that the designation of Pinkham Wood as a site of Importance for Nature Conservation is being removed.

9. I therefore object to inclusion of a change of land designation for DEA6 in the Core Strategy on the grounds that:

- (a) Once again, the consultation process is wholly inadequate
- (b) The proposed change of designation conflicts with the status and condition of the site
- (c) The description of the proposed change is hopelessly inadequate
- (d) The references to the North London Waste Plan are inadequate and potentially misleading
- (e) The proposed change of designation is unclear and ambiguous.

10. Given the circumstances, Haringey Council should be required to withdraw this change of land designation until such times that:

- (a) the public examination of Pinkham Wood has determined its proper status.
- (b) Haringey Council has properly and clearly consulted on the matter.

NOTE: The presentation of the Consultation is confusing in its own right. The Consultee's Letter offers some guidance for responding. The guidance itself is flawed. The guidance suggests that the Core Strategy must meet **2 key criteria** but does not offer any explanation of the nature of the 2 key criteria. The letter, however, offers **8 criteria** without any suggestion which of these criteria are key.

1. **Has the document met legal requirements?** Probably not given that the references to the change of designation for Pinkham Wood (DEA6) are misleading, unclear and ambiguous.
2. **Has it been prepared in accordance with the Local Development Scheme?** No observation.
3. **Is it in compliance with the Statement of Community Involvement?** In May 2007, Haringey Council, in partnership with 6 other boroughs published a Consultation Protocol for the North London Waste Plan. This consultation (which directly concerns Pinkham Wood) falls far below the principles set out in the North London Waste Plan publication.
4. **Has it been subject to a Sustainability Appraisal?** Difficult to see how the Core Strategy, insofar as it concerns Pinkham Wood, has been able to successfully negotiate a fair and reasonable examination of the social, economic and environmental impacts of the policy change to the land designation of DEA6.
5. **Does it have regard to National Policy?** No observation.
6. **Does it conform generally with regional policy?** The proposals at Pinkham Wood clearly do not conform with regional policy on air pollution.
7. **Is it in line with the objectives set out in Haringey's Sustainable Community Strategy.** Undoubtedly not. The change of land designation is concerned solely with employment. It makes no attempt to deal with the lives of local residents, nor their health or their welfare. For example, the change of land designation will bring pollution into (an already heavily polluted) area by the addition of over 1,000 daily traffic movements, many of which involves heavy lorries. In selecting Pinkham Wood as a preferred site, the North London Waste Plan dismissed any consideration of current air pollution or the impact of new pollution as a result of their determination. The Haringey Sustainable Community Strategy sets out to make **"healthier people with a better quality of life"** and put **"people at the heart of change"** just to pick out two of the Sustainable Community Strategy objectives – these objectives cannot be applied to the thousands of people living near Pinkham Wood if the DEA6 land designation change goes through.
8. **Is the document sound?**
  - a. **Justified?** – the Pinkham Wood change of designation is not the result of logical or sustainable discussion about policy, it is the result of a dishonest attempt to cheat people out of the quiet enjoyment of their homes and a clean environment
  - b. **Credible Evidence?** – undoubtedly not – see the objections to the North London Waste Plan, soon to be presented to the NLWP EiP
  - c. **Effective?** – the document is unclear, as explained above
  - d. **Flexible?** – clearly not, otherwise Haringey Council would have removed the offending material rather than go through another flawed consultation
  - e. **Monitorable?** – probably not, Haringey Council appears wedded to secrecy (on a personal level, FOI questions long overdue, remain unanswered – details on request)