

From: Chloe Campbell

Sent: 03 November 2011 10:49

To: LDF

Subject: London Borough of Haringey Local Development Framework - Core Strategy

Attachments: Consultation Repsonse.docx

To LDF Team, Borough of Haringey,

It seems extraordinary that it is only at this late stage in the process that the local community has been consulted on the Core Strategy. While, of course, as a local resident I am relieved to have now had the opportunity for re-consultation, the failure of the Borough to properly consult and listen to its residents seems to show a worrying lack of commitment to the principle of democratic representation.

I have now reviewed the consultation document sent to me and would like to make a number of comments. First, I set out below some of the questions that the team leader for planning asked us to consider with respect to the consultation document. I have only listed those that I feel qualified or competent to comment on, and assume that others will comment on other areas that are of a more technical or bureaucratic nature. I should add that in my view a thorough consultation should ensure that all areas of the consultation get a wide review by competent commentators as well as the local community, and do hope that this has been achieved. A number of us did raise concerns that this consultation document was not sent to a very wide audience and the way in which local people were invited to consult was rather haphazard and unsystematic.

I should note that my primary interest as a local resident concerns the re-designation of the former Friern Barnet Sewage Treatment site from Employment Use to Locally Significant Industrial Site. I will only focus my comments on points pertaining to this.

The team leader for planning asked us to consider several questions including:

1. Has it been subject to a Sustainability Appraisal to examine the social, economic and environmental impacts of the policies?

In this case an appraisal has been submitted. However, I was quite concerned by the limited scope of this appraisal. It certainly cannot be deemed to be an endorsement of the sustainability dimensions of the proposed strategy, as little to no consideration was given to the vast majority of Sustainability Appraisal Objectives. Each section that referred to a particular site was extremely brief and it was unclear how the scope of the appraisal in each case was arrived at (it appeared highly selective) or indeed what evidence the comments were based upon. In the case of the Friern Barnet site the focus of the recommendations was exclusively on biodiversity issues. This is clearly an important aspect of the impact of this development, but just as significant is the impact of noise pollution and emissions due to industrial activity and related transport, the impact of increased road congestion on health, quality of life and transport infrastructure efficiency, and any direct impacts on local businesses. There may also be impacts on house prices and related demographic impacts that should be considered when examining the sustainability of the core strategy. All of this was absent from the consultation document.

2. Is the document justified?

I must say I struggled to understand precisely what this question referred to. I assume it pertained to the logical justification for the changes being proposed. I would see this as being a question of balance between the extent to which the proposals are based on sound evidence and the extent to which there is local support. On both these counts the document appeared quite problematic.

3. Is it based on robust and credible evidence?

I was most surprised to discover when reading the consultation document that essentially no evidence was presented to support any of the proposals being made. I accept of course that this is not a planning application itself, but it would be disingenuous of the planning group to imply that there are therefore no issues arising that require thorough evaluation based upon solid evidence. In the example of the Friern Barnet site, the former proposals foundered partly because of a lack of public consultation but also because the evidence supporting the case was weak, selective and in some cases transparently biased or erroneous. The current consultation, which bears directly on the plans presented previously for the site, does not provide any credible new evidence at all.

4. Is it the most appropriate strategy when considered against the alternatives?

Given that this question was asked, I was also surprised to find no evidence that the planning group had considered any alternative uses of the Friern Barnet site.

5. Is it consistent with national policy?

There are several areas in which the consultation document does not seem consistent with national policy. Areas that may come into particular conflict with national policy concern biodiversity (Planning Policy Statement 9, 2005) and air quality (see for example the update to the EAC inquiry of 2009/2010). In the latter case, there is agreement both at a national level and within Haringey Council's own air quality strategy that targets for air quality improvement have not been met for particulates and NO₂, both of which are fundamentally related to traffic levels and congestion, which the change of site would directly impact upon.

Overall, the consultation document did not to my mind represent a thorough and appropriately wide-ranging proposal that properly considered all of the relevant issues in favour and against. I found little solid discussion, backed up by evidence, that would allow me to take a proper view on whether or not the proposal would meet local and national needs effectively. Given local opposition – based on rather stronger evidence – a change of use for the Friern Barnet site seems unjustifiable.

Yours sincerely,

Dr Chloe Campbell