

Lincia Daniel

Thursday 3rd November 2011

Haringey Council
LDF Team, London Borough of Haringey,
River Park House (6th Floor),
Wood Green, N22 8HQ.

Dear Sir/Madam

I'm writing to oppose Haringey Council's proposed changes to the Employment Land Designations.

I believe there is no evidence based argument for the change in designation of the Former Friern Barnet Sewerage Treatment site from Employment Use to Locally Significant Industrial Use. There is a caveat that stresses that the site's use should not be subject to **an adverse effect on the nature conservation value of the site**. I believe this caveat should remain in force and I am totally opposed to it's removal.

Haringey's Biodiversity Action Plan of October 2009 evidences the under-provision of of both woodland and local nature reserves within the Borough. Given National Planning policy objectives, in particular the key objectives and policies set out in the PPS 1 Supplement on Planning and Climate Change and PPS 9 on Biodiversity; the former Friern Barnet Sewerage Treatment Works site should be removed from the proposed list of Locally Significant Industrial Sites and awarded the alternative designation of Metropolitan Open Land. This would far better reflect policy and is clearly a more appropriate and fitting designation. Also the site is part of a key key green corridor within the Borough, and should be protected from development, to prevent further fragmentation of the important matrix of green spaces. Haringey should also seek to have the site designated as a Local Nature Reserve.

Given it's obligations to improve air quality and the environment, Haringey should consider using this site to create pedestrian or cycle routes from Tunnel Gardens along the side of Muswell Hill golf course across the North Circular to the Retail Park. This would help tackle obesity, help address the serious air quality issues on key roads in the Borough, improve health, and reduce carbon emissions. In addition, it would create a green chain that could form part of a North London greenway. It would also provide an education resource for local schools.

In particular, I strongly object to this re-designation on the following grounds:

- **The plan is not based on robust or credible evidence**
No credible evidence was produced at the first Examination in Public, and the re-consultation document (CSSD-3) has no new evidence. The updated Sustainability Appraisal which has been produced by Hyder Consulting UK Limited to provide further evidence in support of this re-consultation does not contain any new evidence to support this re-designation; on the contrary, it points out its threat to the biodiversity of the site – see below.
- **There is no evidence that Haringey considered whether this was the most appropriate strategy against alternatives** such as Metropolitan Open Land designation, alternative Local Green Space designation (or local SLOL designation?) or Green Grid cross boundary green space connecting Barnet, Haringey and Enfield.
- **It is not consistent with national policy:** [PPS 9](#) is the overarching framework in which policies should be developed - particularly para 9, which states that networks of natural habitats provide a valuable resource.
- **It does not accord with Regional Policy:** See The London Plan in particular [Policy 7 \(7.14 and 7.18-7.21\)](#).
- **It is not deliverable:** The LSIS designation is only deliverable if the Grade 1 Borough Importance for Nature designation is removed or substantially compromised. The Council's own additional evidence points out in relation to the Friern Barnet site in particular that any development on the site has potential to have biodiversity impacts because it is a Site of Importance for Nature Conservation (p6 of [Hyder Addendum SA](#)). The bigger the development the bigger the impact.

Thank you for taking the time to consider this objection. It is much appreciated.

Yours sincerely,

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