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Sent: 27 October 2011 12:57

To: LDF

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Subject: Haringey Core Strategy Consultation - Objection to change of land designation at Pinkham Way, N11

Friern Village Residents' Association

To Haringey LDF team,

Our Association has very strong objections to the proposed change of land designation from "Employment Use" to "Local Significant Industrial Use" for the former Friern Barnet Sewage Works site at Pinkham Way, N11, in Haringey's latest Core Strategy.

Our reasons for objecting to this change are as follows:

1. This site has not been used on a continuous basis for 47 years, since 1963 when the former sewage works closed, apart from some dumping of concrete lampposts, at an unknown date. The land has reverted to nature and quite correctly is currently classed by Haringey as a Grade 1 SINC (Site of Important Nature Conservation). Bats are known to feed and occupy the site along with many other valuable flora and fauna.
2. Haringey have given no credible guarantees of protection for the valuable nature conservation of this site were it to become used for industrial purposes. We believe that to designate a Grade 1 SINC for industrial use is in direct contravention of National Planning PPS 9 "Biodiversity and Geological Conservation" <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147408.pdf> which in paragraph 9 states: *Regional and Local Sites - 9. Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education. Criteria-based policies should be established in local development documents against which proposals for any development on, or affecting, such sites will be judged. These policies should be distinguished from those applied to nationally important sites.*
3. Apart from the loss of much of this valuable natural habitat for nature a change of designation would pave the way for inappropriate industrial plant covering much, if not all of the site. This loss of open green space is absolutely in opposition to the London Plan particularly Policy 7.18 which provides strong support for a further creation of Local Open Spaces such as at Pinkham Way.

4. Pinkham Way is part of a green corridor for wildlife extending from Muswell Hill to the North Circular Road. What protection is given in the change of designation to this element? Haringey's own Sustainability Appraisal highlights the threat to the biodiversity of the site were it to become industrial land. If their own survey highlights this problem why attempt to persevere in the change of use?
5. The change of use is in direct opposition to The London Plan Policy 7.19 "Biodiversity & Access to Nature". Has Haringey consulted with London Wildlife Sites Board as directed in this policy?
6. Pinkham Way is next to the North Circular Road which because of intensive traffic usage and high levels of air pollution is an air quality management area. Green open spaces near to such areas are known to reduce the full impact of the air pollution both in the case of PM10's and NOx. It is therefore vital that Haringey continue to protect this "lung" of the borough and does not lessen its protection in any way, especially by classing it as industrial land which by its very nature is likely to worsen the air quality of the area. Air pollution is a known cause of premature deaths. Coppetts Ward in Barnet, which is next to Pinkham Way, already has the highest premature death rate in Barnet. Again to remove this green open space by designating it for industrial use is in contravention of the London Plan Policy 7.14 "Improving Air Quality".
7. No thought appears to have been given to the strategic importance of this green open space with regard to local amenities and quality of life. Haringey have stated that they wish to increase the amount of woodland in the borough yet a change of designation for Pinkham Way would reduce, not increase the total wooded area within the borough. They have not explained this contradiction in their own policies. Up until very recently local people regularly used the site for recreational purposes. It is only since the North London Waste Authority fenced the whole site off during the summer that locals have been deprived of access to this local unofficial "nature reserve".
8. It would appear that Haringey have only altered the designation in the latest version of the Core Strategy after discussions with the North London Waste Authority who recently acquired the site from Barnet Council. Up until these discussions with NLWA there was no indication that Haringey intended to change the designated use of Pinkham Way and certainly no discussions with local residents. It can only be assumed that the NLWA are dictating land use policy within Haringey and this is wholly inappropriate behaviour.

9. Once Haringey agreed to the change of use in the Core Strategy they failed to notify and fully consult with all affected residents and businesses around the area. Even this second consultation has only become widely know through the efforts of very concerned residents. Haringey has not given residents the full background reasons for the proposed change and therefore most people living in that area have not understood the implications of this change. We are certain that if Haringey were to be fully truthful with residents and explain that the change of use is only to allow the future building of a major waste treatment plant in their neighbourhood, far more residents would be appalled at the secretive way in which the council has behaved throughout this matter.

10. Pinkham Way may not all be an historical ancient woodland, although part of it are the remains of Tottenham Woods dating back centuries. It is however a very valued piece of local green open space in a highly congested and built-up part of our great capital. To lose such a valuable green open space to industrial use would be catastrophic and change the very nature of this part of London. If Haringey feels the need to increase its land designation for industrial use then surely far more appropriate brown field sites are available throughout the borough. Pinkham Way is no longer a brownfield site by any stretch of the imagination but a high valued green "lung" for our area. Why destroy something which all local and national policies value so highly?

Regards,
Peter Storey
Secretary, Friern Village Residents' Association

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