



The Planning Inspectorate
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Your ref:

Date: 27th July 2011

Our ref:

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Dear Miss Ingham,

Re: Haringey Core Strategy Examination

Thank you for your letter dated 21st July 2011 regarding the above. Please see the Council's response to each of your points below:

1. **Consultation upon the Core Strategy Fundamental Changes (Core Document Ref CSSD-03)**
 - 1.1 In response to the issue of the reasons why the Council carried out the above consultation for a period of four weeks, and aimed at a target consultee group, I refer the Inspector to section 3 of the Council's letter to Mr Brice dated 28/06/2011. The Council maintains its approach to the manner in which it carried out consultation on the Core Strategy Fundamental Changes.
 - 1.2 However, to ensure soundness of the document, and in the interests of fairness and natural justice, the Council considers it appropriate to carry out a revised borough-wide consultation on the Fundamental Changes (Core Document Ref CSSD-03) for six weeks (approximate end date of consultation mid October).
 - 1.3 This revised consultation will be borough wide with all consultees on the Council's database and will fully accord with the Regulations and the Council's Statement of Community Involvement. Following the closure of the revised consultation and consideration of any responses received the Council will submit its analysis and recommendations to the Inspector. In this event, the Council would consider the representations received and our response and make appropriate representations to the Inspector as to whether it is possible for these

matters to be dealt with by written representations but recognises that further hearing sessions may be required.

2. LSIS and LEA designation

- 2.1 In line with the London Plan and PPS4, the Council has established an employment land hierarchy where certain types of employment uses should be concentrated. These employment areas vary in age, quality and size of buildings, access and the nature of businesses within them.
- 2.2 An Employment Land Study undertaken in 2004 led to the identification of Defined Employment Areas in Haringey's Unitary Development Plan (2006). The UDP set out a hierarchy of Defined Employment Areas which included the following:
- **Strategic Employment Locations:** London Plan designations;
 - **Industrial Locations:** well established industrial areas and the aim is to retain these areas solely for uses that fall within the B1 (b) or (c), B2 or B8 use classes;
 - **Employment Locations:** a more flexible approach will be taken in these areas and may allow employment generating uses wider than the B use class. Friern Barnet falls under this category;
 - **Regeneration Areas:** in principle mixed use including residential, employment and community facilities are appropriate within these areas.
- 2.3 An update of the Employment Study 2004 was undertaken in 2008 (finalised 2009) to support the Council's Core Strategy. The Study recommended that Haringey retain all of its designated Defined Employment Areas and continue to protect employment land and buildings, therefore increasing local job opportunities and reducing commuting and travel to services outside of the borough.
- 2.4 Core Strategy SP8 has taken forward this recommendation. However, the DEAs have been re-named to reflect changes to the London Plan and the Mayor's SPG on Industrial Capacity. The hierarchy consists of:
- **Strategic Industrial Land:** London Plan designations;
 - **Locally Significant Industrial Sites:** in line with the Mayor's Industrial Capacity SPG, the Council has developed local policy to manage Locally Significant and other smaller industrial sites (the same designation and principles as the UDP designation "Industrial Locations");

- **Local Employment Areas: Employment Land:** the same designation and principles as the UDP designation “Employment Locations”
- **Local Employment Areas: Regeneration Areas:** the same designation and principles as the UDP designation “Regeneration Areas”.

2.5 The Council considers the employment land designations in the Core Strategy of the Friern Barnet and Bound Green Sites are justified by evidence base and are in line with the London Plan and carry through the recommendations as set out in the Employment Land Study.

3. Change in designation of Friern Barnet to LSIS

3.1 In conjunction with the Core Strategy’s objectives to protect employment land, provide more jobs and training opportunities and securing land and premises for the borough’s businesses, the review of some of the employment land in the borough aims to ensure there is adequate land for employment uses up to 2026.

3.2 The proposed changes in designation to some of the 22 UDP defined employment areas reflects the alteration of the uses to those areas over the years and attempts to reconcile the existing use of those areas to their possible transformation in the future. The review of the designations identified the sites that require stronger protection to ensure there are sufficient sites to accommodate ‘B’ class uses. As well as ensuring there is sufficient land for ‘B’ class uses, the Council is charged with providing land for other uses which help to create a sustainable community, including leisure, education and social infrastructure. Changes to more flexible designations would release land for some of these uses.

3.3 As part of this review, the Council considered that the Friern Barnet and Bounds Green sites needed stronger employment land (and were inappropriate for strictly non-B type employment uses). They were designated as Locally Significant Industrial Site (LSIS). This approach also accords well with the concept of sustainable communities. Both of these sites are in the west of the borough where there is comparatively less industrial land availability.

3.4 The Council when reviewing the designation for Friern Barnet site also took account of the North London Waste Plan preferred options. The designations in the Core Strategy need to provide a planning framework for the next 15 years and should not remove flexibility for other emerging plans or major infrastructure needs.

4. Nature conservation of Friern Barnet

- 4.1 The Council can clarify that the Friern Barnet site is a Grade 1 Site of Borough Importance for Nature Conservation as identified in the UDP 2006; the GLA's document entitled Sites of Importance for Nature Conservation in Haringey 2003 and Table 36 of the Haringey Biodiversity Action Plan. This designation will be maintained in the Core Strategy.
- 4.2 In line with the Town and Country Planning (Local Development) (England) Regulations 2004, Haringey submitted for examination along with the Core Strategy, proposed changes to the proposals map (document reference **CSSD-04**). The series of map extractions and the corresponding table show up to date changes to the current UDP Proposals Map, and acts as a link between the current UDP Proposals Map and the envisaged Proposals Map which will accompany the Core Strategy. As no change to the nature conservation designation of Friern Barnet site has been proposed, there is no such change included on these amended maps.
- 4.3 The Council recognises the error in Figure 6.2 page 152 of the submitted Core Strategy (chapter 6.3 on Open Space and Biodiversity). This map is intended to be illustrative only and does not show all of the borough's open space and biodiversity designations. This error highlighted during the Core Strategy hearing process and with the Inspector's agreement the Council will revise this map to show the correct information, to be included in the adopted Core Strategy.
- 4.4 To summarise, the Council are not proposing to remove the nature conservation designation at Friern Barnet, and Figure 6.2 of the submitted Core Strategy will be corrected to include all of the borough's open spaces and areas of biodiversity.

5. Dual designation of the Friern Barnet site

- 5.1 The dual designation of Friern Barnet site has always existed. As already mentioned, Friern Barnet is designated an Employment Location and a site of importance for nature conservation in the UDP. UDP Policy **OS6 *Ecologically Valuable Sites and their Corridors*** and emerging Core Strategy **SP13 *Open Space and Biodiversity*** state that development should have no adverse effect on the nature conservation value of a site. SP13 goes onto state that where a site has more than one designation, appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided. Each case will be looked at on its merits having regard to all material considerations.

- 5.2 The Sustainability Appraisal (SA) submitted alongside the Core Strategy, to the Inspector in March 2011 sets out its appraisal methodology and outputs of the SA Framework, which consists of the SEA and the SA Report. The methodology used is in line with the requirements of the Planning and Compulsory Act 2004, SEA Regulations and ODPM guidance.
- 5.3 The baseline information used in appraising the policies at each stage is in line with SEA Directives. The baseline data indicators, key trends and targets used are set out in Appendix B of the SA (Core Document CSSD-06). The baseline data is based on social, economic and environmental information, including all designations. This means that as the Friern Barnet site has a SINC designation, this was taken into account from the outset in the appraisal process, along with the change in employment land designation. The outcomes from the assessment supports the Council's approach which requires proposed developments on ecological valuable sites and their corridors, to demonstrate that there will be no adverse effect on the nature conservation of the site. The agreed appraisal methodology is set out in Section 2.4 of the SA (Core Document (CSSD-03). Accordingly the Council does not consider that there is an insuperable incompatibility between the two designations for this site.

I trust the above answers your queries.

Yours sincerely,

Haringey LDF Team