

**From:** Frances Heigham

**Sent:** 27 October 2011 22:33

**To:** LDF

**Subject:** Haringey LDF Core Strategy proposed changes : Consultation 22 September to 3rd November 2011

Dear Sirs

I am writing in response to the revised consultation on Core Document CSSD-03 and in particular to the proposed change in designation of the former Friern Barnet Sewage Works at Pinkham Way London N10, ("the PW site") which would re-classify the site as a Locally Significant Industrial Site ("LSIL").

I do not consider the document comprising the proposed change in classification of the PW site as a LSIL to be sound for the following reasons:-

1. It is not justified (see below).
2. It is not based on robust and credible evidence - in fact no evidence in support of the proposed change is provided, and under the heading "reason for the change" there is only a reference to "discussions which have already taken place to use part of the site for recycling centre and other part as a waste station". That does not constitute robust and credible evidence, especially as no details are given in the document of the discussions referred to. It is understood that the discussions in question were with the North London Waste Authority and that the subject of the discussions would have been the desirability of changing the classification of the site to facilitate its subsequent planned use for a waste treatment plant. If that is correct then it appears to me that Haringey's main motive in attempting to reclassify the site as a LSIL, is to bring the site within that category of sites stated to be suitable for waste purposes, under the London Plan. That is not legal justification for the document.
3. Use for industry is not the most appropriate strategy for the PW site when considered against alternative possibilities, one of which would be as Metropolitan Open Land (in common with adjoining land already so designated) with public accessibility. Part of the site is already a Site of Importance for Nature Conservation (SINC) of Borough Importance in Haringey, which as a borough is notably lacking in such sites. Use of the PW site for any sort of industry would be likely to negate the present ecological value of the site, which has been left for over 50 years to become a natural wood with abundant flora and fauna (and thus, contrary to Haringey's claim for its LSILs in para 5.1.10 on page 16 of the document, is not at all a "well established industrial area"). In spite of the fact that the site has been classified as employment land (subject to the SINC designation) for over 20 years, no planning permission has been granted for a use which would provide employment on the site, so that the suitability of the site for employment purposes must be called into question.

Furthermore the document does not comply with the Haringey Statement of Community Involvement (SCI) in that the part of the community most likely to be affected by any development on the PW site has not been adequately involved in the preparation of the document, either in its original or its revised form.

Nor has the revised consultation been carried out in accordance with the SCI. Publication of the revised consultation has been inadequate, and in particular there has been no attempt by the London Borough of Haringey to include in the list of consultees, or even to notify by leaflet or advertisement, many residents in the areas close to the PW site who are most likely to be affected by the use of the site for industrial purposes. I live less than half a mile from the site and have only learned of the revised consultation from information supplied to me by the Pinkham Way Alliance, which is campaigning against the proposed NLWA waste treatment plant on the site, and my neighbours are in the same position. Even a local

group (Freehold Community Association) which made representations to the Examination in Public of the Core Strategy earlier this year, has not been informed of the revised consultation and invited to respond. This makes it look as if Haringey Council is aware that it lacks any valid ground for changing the designation, and is attempting to avoid the expression of valid responses by affected parties, by failing to provide them with an opportunity to put objections (or other comments) forward to be considered. This would appear to be prejudicial to interests of fairness and natural justice.

I would be grateful if you would ensure that my response is passed to the Inspector who is leading the examination in public of the Core Strategy.

Yours faithfully

Frances Heigham

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