

Pinkham Way Alliance

Ms C Thorby
Planning Inspectorate
Local Development Plans
Temple Quay House
Bristol
BS1 6PN

Dear Ms Thorby

13 January 2017

Re: Haringey Local Plan Examination In Public – Modifications to Haringey Council's policy documents consultation 18 November 2016 – 13 January 2017

You will recall that during the hearing on 31 August 2016 into Site SA52 (Pinkham Way), the Council quickly conceded that they had no justification for including Pinkham Way in the Site Allocations Development Plan Document.

Following the Council's agreement at the hearing to remove the site from the SADPD, you explained that removal from the SADPD did not automatically mean that the Employment Land designation element of the dual designation on the site would fall away and you kindly agreed to consider the soundness of the EL designation when you reviewed the Strategic Plan modifications in preparation for your report.

Strategic Policies modifications

The evidence for the Council's retention of this designation was not tested in the Strategic Policies modifications hearing. Instead it was questioned in the Site Allocations hearing where it was not possible to address all PWA's evidence as we were limited to dealing with the site allocations issues only.

In relation to the Strategic Policies modifications, we note that the sole modification to the Pinkham Way site is simply a change of name. The site continues to be identified as one of the two Local Employment Areas classified as Employment Land.

The anomaly of the site's dual planning status needs to be resolved. Inspector Seaman raised a number of issues about the contradictory nature of the dual designation which were never satisfactorily answered by the Council and he recommended in his Report on the Council Local Plan in 2012 that the site's designation should be reviewed and that the SADPD would provide a suitable opportunity to do so.

In our response to the Strategic Policies Modifications consultation we have provided evidence demonstrating the unsoundness of the Council's case for retaining the

Employment Land designation. Our evidence includes a number of material changes that have occurred during the consultation process but which have not been addressed during the recent EiP hearings and which are relevant to your decision on Pinkham Way.

Site Allocations - modifications

The Council's comments relating to SA52 (Pinkham Way) in the Schedule of Modifications to the Site Allocations DPD lack clarity, both in the Description of Change and Reason for Change and we have addressed this in our response to the Site Allocations DPD consultation.

The fact that the Council were unable to justify the site's inclusion in the SADPD and so quickly agreed to remove it at the hearing demonstrated that they had not properly or objectively considered all the evidence before including it.

We are sending our response directly to you because, regrettably, we do not believe that the Council has acted in good faith in dealing with our evidence throughout the consultation process over the past four years and we wish to make sure that you have all the relevant evidence we have submitted.

Residents have had a legitimate expectation that representations made on their behalf about the site's status would be taken fully into consideration by Haringey Council, and that decisions about whether its retention was justified/sound would be based on objectively assessed evidence. We do not believe this to have been the case.

We should therefore be grateful if you would kindly take this opportunity to give full and careful consideration to the Council's proposed retention of the Employment land designation of this site in the Strategic Policies, (which we believe is not justified), and to the evidence we have attached to assist you.

Proper consideration of all the evidence at this stage will avoid the community having to incur further unnecessary expense in its pursuit of a transparently fair and justified decision on the planning status of this site.

Stephen Brice
Chairman
Pinkham Way Alliance