

Response to the Haringey Local Development Framework Public Consultation on the Core strategy

Thank you for the opportunity to respond to the above consultation. My comments relate to the re-designation of the Pinkham Wood site from Employment Use (EL) to Local Significant Industrial Use (LSIS).

I have concerns over this re-designation for the following reasons:

1. **It is not based on robust or credible 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.
2. **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.
3. **It is not consistent with national policy:** PPS 9 is the overarching framework in which policies should be developed - particularly paragraph 9, which states that networks of natural habitats provide a valuable resource. This is especially important when read in conjunction with the analysis of the Friern Barnet site in the Hyder Consulting Addendum.

Additionally when considering national policy, reference must be made to the defra white paper on the Natural Environment: <http://www.defra.gov.uk/environment/natural/whitepaper/> . In particular, the proposals in section 4.23 for Green Area Designations giving local people the opportunity to protect green spaces that have significant importance for their local communities. This suggests that residents most local to Pinkham Wood should have a significant say in any future development.

Further, the re-designation does not appear to accord with the Planning and Development priorities set out in chapter 2 of the Government's Biodiversity Strategy document, Biodiversity 2020: <http://www.defra.gov.uk/publications/files/pb13583-biodiversity-strategy-2020-110817.pdf>

4. **It does not accord with Regional Policy:** The London Plan, in particular Policy 7 (7.14 and 7.18-7.21) covers the protection of such things as biodiversity, trees and woodland which appears at odds with the Pinkham Wood re-designation as it would render the site vulnerable to industrial development.
5. **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 (page 6 of the Hyder Addendum).

In conclusion I request that you give consideration to the above points and re-instate the Pinkham Wood site as Employment Use.

Regards

Nick Jenkins

2 November 2011