

From: Owen Lowe
Sent: 01 November 2011 11:15
To: LDF
Subject: Pinkham Way PROPOSED incinerator

Importance: High

I am making the following points which you also may wish to adopt:

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1.

I object to a designation of the former Friern Barnet Sewage treatment site as a Locally Significant Industrial Use. The loss of any protection for the nature conservation value of the site would be detrimental to the natural and local environment.

2.

I formally request an assessment of the eco systems and natural habitats on the site to determine its nature conservation value. The Government have now provided the tools for conducting such an assessment which should form the basis of any proposed re-designation.

3.

It should be noted that the loss of the caveat to protect the nature conservation is a major change to the protection this site. A consequence would be the likely loss of this valuable nature conservation site, which is one of only nine sites designated Grade 1 of Borough Importance for Nature Conservation.

4.

It will widen the range of uses on the site to include heavy industrial type uses, with all the potential noise, pollution and traffic congestion impacting upon the local environment

5.

Inevitably re-designation would mean the site would become vulnerable to Policy 4.4 of the London Plan, which directs local authorities in London to identify Locally Significant Industrial Sites which might be suitable for waste management. The significant local opposition to such a use should be noted.

6.

It is not based on robust or credible evidence. No credible evidence was produced at the Examination in Public, and the re-consultation document CSSD-3 has no new 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 the threat to the biodiversity of the site.

7.

In the Core Strategy pre-submission draft, the site was designated Employment Land,

with supporting evidence for this designation. It would seem that pre-planning application discussions with North London Waste Authority and Barnet Council in relation to the development of a waste processing plant and Barnet Council's proposal to relocate its refuse vehicle depot have influenced the proposal to re-designate use. This gives continued grounds for again concluding that the consultation would "appear to be prejudicial to the interests of fairness and natural justice".

8.

There is no evidence that Haringey considered whether alternative designations would be appropriate - e.g. Metropolitan Open Land, Local Green Space designation or Green Grid cross-boundary green space, connecting Barnet, Haringey and Enfield

9.

National policy has recognised that networks of natural habitats provide a valuable resource and this should be reflected in the Core Strategy, and specifically in the designation of the site.

10.

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

11.

Finally, the Government has just concluded its consultation with regard to National Planning Policy Guidance (NPPG). It would be premature to re-designate in advance of consideration of the NPPG which should then lead to consultation on the Core Strategy.

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