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Sent: 03 November 2011 15:01

To: LDF

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Subject: Response (LDF) Public Consultation

November 3. 2011

To:

Haringey Local Development Framework (LDF) Public Consultation
Town and Country Planning (Local Development) (England) (Amendment) (2008)
Publication of a Development Plan Document (Regulation 27) Haringey's Core Strategy
—
Revised additional Regulation 27 on Fundamental Changes to Employment Land
Designations and Affordable Housing

This letter is from and on behalf of the members of Muswell Hill Sustainability Group.

In our opinion the document is unsound regarding re-designation of the Pinkham Way site from Employment Land (EL) to Locally Significant Industrial Sites (LSIS)

We respond to two of the key questions asked of consultees with the following;

1. Is the document justified?

Table 1: Designated Employment Areas (Dea) In the London Borough of Haringey Local Development Framework – Core Strategy

Friern Barnet
Sewage Works,
N10

EL LSIS 6.2 A change in designation will ensure this DEA is targeted towards more

traditional industrial uses. Is usually applied to heavy industry
mining employment for lots of people
Complies with pre-application

a. The re-designation of the Pinkham Way site from Employment Land to Locally Significant Industrial Site was inserted without consultation into the new Local Development Framework and clearly helps to facilitate the NLWA's plan for the site. It is unclear what the phrase complies with pre-application means. We can find no other reference to it. This leads us to believe that criteria favouring the North London Waste Authority caused Haringey Council to change the designation of Employment Land because it posed an obstacle to the plans for the Pinkham Way waste processing plant and the Barnet Council lorry depot. We are prompted to believe that in its role of contributing member to the North London Waste Authority, Haringey Council might have made the alteration to smooth the way for the Pinkham Way waste processing plant. The act of re-designating the site to open up the possibility for specific as yet unapproved plan is improper.

NLWA plans for the future of the site were already well underway when the re-designation took place. The re-designation can be taken to mean that the NLWA either put undue pressure to have the designation altered or that the business of the NLWA and Haringey Council have become so blurred as to have blinded the planning authorities to the proper procedures that they should be following.

b. In paragraph 1.6 of the LDF regarding Employment Land, it is stated that; 'It is important that we consider the designations to provide a positive strategic policy for safeguarding employment land,' The designation of Employment Land of the Pinkham Way site was totally lacking any safeguard when quietly it was changed last year.

c. Our committee was unaware of the re-designation until this summer and we are assured that our membership and local residents knew little or nothing of this significant re-designation. Bearing in mind the acknowledged potential for the huge waste processing plant created by the re-designation of the Pinkham Way site and the effect(s) this can and might have on local residents, a very public and widely advertised consultation should have been called prior to re-designation.

2. Is it the most appropriate strategy when considered against the alternatives?

a. Given that there were no plans for the Pinkham Way site under its Employment Land designation there are no alternatives to consider. The Locally Significant Industrial Sites (LSIS) designation targeting traditional industry, or rather, with the clear intention of the NLWP's waste processing plant, is not compatible with its shared designation as a Site of Importance for Nature Conservation. Haringey Council has a duty to the protection of SINCs and should have put forward other options for the site under the Employment Land designation before proposing re-designation.

b. Large scale traditional industrial use of the Pinkham Way site will be required to adhere to staged significant carbon reduction targets. Complying with these targets will effectively rule out the Pinkham Way site for traditional industrial usage because of inadequate access by road, rail or canal and difficulties in using secondary or waste heat.

c. Proximity to housing and schools poses an obstacle to obtaining the necessary planning permission for any project under the designation of Locally Significant Industrial Sites industry that can potentially threaten air quality and substantially increase traffic. Smaller scale solutions under the Employment Land designation are more likely to satisfy local concerns and address local needs and to protect Haringey Council's statutory obligations to the natural environment.

Conclusion

In our view proposals for development under the previous designation of the Pinkham Way site as Employment Land can be more easily made compatible with its shared designation as a Site of Importance for Nature Conservation.

Haringey Council should bear in mind that it has the obligation to maintain the important role of the site in London's biodiversity and of its part in a green corridor. We feel that

Haringey Council will be remiss in its duty to protect the site if the re-designation to LSIS stands and we insist that the designation should revert to Employment Land.

Alternative plans for the Pinkham Way site have not been explored. We feel that under the Employment Land designation that there are creative possibilities for the site that could provide wildlife refuge and corridor, pedestrian and bicycle access to the retail park and employment. Proposals for the site under the Employment Land designation should be invited in order for alternative strategies to consider.

On behalf of Muswell Hill Sustainability Group
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