

LDF Team,  
London Borough of Haringey,  
River Park House (6<sup>th</sup> Floor),  
Wood Green,  
N22 8HQ.

28<sup>th</sup> October 2011

Dear Sir/Madam,

I write in relation to the Council's consultation on the fundamental changes to the Core Strategy and the associated Sustainability Appraisal.

I am particularly concerned by Policy SP8 – Employment. This policy designates the former Friern Barnet sewerage works as a Locally Significant Industrial Site. However, in the Council's adopted UDP (2006), as shown on the Proposal's Map, the site is identified for '**employment uses subject to no adverse impact on the nature conservation value of the site**'.

I consider that, given the nature conservation value of the site and the site's position adjacent to a ecological corridor, the site could be appropriately re-designated as a Local Nature Reserve.

Therefore, while the Sustainability Appraisal states the following:

**"safeguarding this locally significant industrial site will contribute to the London wide framework of sites for industry,, business and warehousing and will also help address the imbalance of industrial sites available in the west of the borough compared to the east",**

given the biodiversity value of the site I would argue that this is not the most appropriate site to address the imbalance of general employment, as allowed for under the UDP, as opposed to industrial sites. In addition, the Sustainability Appraisal appears to have pre-empted a change in designation of the site to a locally significant industrial site, whereas the emphasis on biodiversity and ecology on the site would suggest that the site should be preserved for nature conservation.

At the very least, I consider that the UDP's caveat for the site, i.e. '**employment uses subject to no adverse impact on the nature conservation value of the site**' [my underlining], should remain in policy for this site. The omission of this in the Council's proposed Core Strategy policy for the site could have serious implications in terms of the nature conservation value of the site which is acknowledged in the Sustainability Appraisal:

**"The Friern Barnet site is a brownfield site, which is also a Site of Importance for Nature Conservation, with some known biodiversity value. Any development in the site therefore has potential to have biodiversity impacts"**

The Sustainability Appraisal also sets out that:

**"the site [...] adjoins an Ecological Corridor and redevelopment of the site would have an indirect adverse effect in wildlife [sic]"**

The removal of the caveat "subject to no adverse impact on the nature conservation value of the site" appears contradictory to the Council's own Sustainability Appraisal of the site and it is imperative that this caveat remains in place for the site, regardless of its land use designation.

I have a second concern regarding the change in allocation from general employment to industrial. This is that there does not seem to be a robust justification for the amendment of the use designation of the site from employment to industrial. Table 1 of the Fundamental Changes document states the following reasons for the change in designation of the land:

**“A change in designation will ensure this DEA is targeted towards more traditional industrial uses.**

**Complies with pre-application discussions which have already taken place to use part of site for recycling centre and other part as waste station”.**

This reason is inadequate as it suggests that the formulation of local planning policy is being driven by a potential planning application. However, PPS 1 sets out that a plan-led system:

**“is central to planning and plays the key role in integrating sustainable development objectives. Where the development plan contains relevant policies, applications for planning permission should be determined in line with the plan, unless material considerations indicate otherwise”** (paragraph 8)

This principle is carried forward in emerging policy through the Government’s draft National Planning Policy Framework, which states that **“planning should be genuinely plan-led”** (paragraph 19). To amend the designation of this site due to a potential planning application for which there have been pre-application discussion directly contradicts both adopted and emerging Government policy.

Furthermore, the Fundamental Changes to the Core Strategy document sets out that the Friern Barnet site was identified as a Defined Employment Area in both the 1998 and 2006 UDPs but has not come forward for this use. It then states that the whole site remains suitable entirely for B class employment uses. However as the site has remained vacant for many years, during which time I expect the nature conservation value of the site has increased, it is not clear how the site can now be considered suitable for designation as a Locally Significant Industrial Site.

Overall, the Council appears to be attempting to create a positive framework for a future planning application for which there have been pre-application discussions and does not provide enough robust evidence to support the proposed designation of the site, the change of designation for the site from general employment to industrial, or the removal of the caveat relating to impacts on the nature conservation value of the site. I attach representations that I made to the North London Waste Authority regarding the potential waste plant on this site.

I therefore object to Policy SP8 and request that the former Friern Barnet sewerage works site is either designated as a Local Nature Reserve, or at the very least remains designated as set out in the UDP, for ‘employment uses subject to no adverse impact on the nature conservation value of the site’.

I trust that the Council will take the above comments into account.

Yours Faithfully,

Mark Nevitt