

LDF Team  
London Borough of Haringey  
River Park House (6<sup>th</sup> Floor)  
225, High Road, Wood Green  
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And via e-mail

London, 26 October 2011

re: Revised Consultation on Core Strategy Fundamental Changes 22 September – 3  
November 2011

Dear Sirs

I'm referring to your letter of 22<sup>nd</sup> September 2011 in which you invite responses to the above mentioned Consultation.

Having taken notice of the content of the documents on Haringey's Core Strategy as published online at: [www.haringey.gov.uk/local\\_development\\_framework/core-strategy-examination](http://www.haringey.gov.uk/local_development_framework/core-strategy-examination), I wish to make the following comments:

Haringey Council are re-consulting about its proposal to re-designate the Former Friern Barnet Sewage treatment site (Pinkham Way) from *EL - Employment Use* (subject to 'no adverse impact' on the nature conservation value of the site) to *LSIS - Locally Significant Industrial Use* (with no linked protection for the nature conservation value of the site).

This change implicates that:

- ⤴ The loss of the obligation to protect its biodiversity will substantially increase the likelihood that the ecologically rich natural habitat of this site, which is one of the few sites in the Borough designated 'Grade 1 of Borough Importance for Nature Conservation', will be lost.
- ⤴ It will widen the range of uses on the site to include heavy industrial uses, with all their potential for noise, pollution and traffic congestion.
- ⤴ The site will be made subject to [Policy 4.4 of the London Plan](#), which directs local authorities in London to identify Locally Significant Industrial Sites that might be suitable for waste management. If the site is not re-designated LSIS, it will not fall within this policy.

My objections to this re-designation are:

- ⤴ **It is not based on robust or credible evidence.**

The re-consultation document (CSSD-3) has no new evidence to support this re-designation; in the Appendix only a *reason* for this change is given

The 'Addendum to the Sustainability Appraisal', produced by Hyder Consulting (UK)

Limited to support this re-consultation, does not contain any new evidence which supports this re-designation either.

- ⤴ **It is not consistent with national policy.**

Planning Policy Statement 9 ([PPS 9](#)) is the overarching framework within which policies should be developed. Paragraph 9 'Regional and Local Sites' stresses the importance of sites with local biodiversity. Moreover, as the Pinkham Way site adjoins Metropolitan Open Land and an ecological corridor, it can be considered as a Network of Natural Habitats.

Paragraph 12 of PPS 9 explicitly states that 'local authorities should aim to maintain such networks and protect from development'. Haringey's re-designation of the Pinkham Way site unmistakably contravenes these PPS 9 stipulations.

One can only speculate on the Council's motives behind the proposal to re-design the

Pinkham Way site. Has it been influenced by discussions with the North London Waste Authority about the allocation of a site for building a large Waste Processing Plant?

In any way, for the above mentioned reasons the Council's proposal for re-designation of the Pinkham Way Site is **unsound**.

G.J. Ormel