

Haringey LDF Core Strategy
Public Consultation Sept/Oct 2011

Dear Ciara Whelehan,

thank you for your invitation to contribute to the revised Haringey Local Development Framework Core Strategy Public Consultation.

My response is based on the decision to re-designate Pinkham Wood (which nearly 50 years ago was the Friern Barnet Sewage Treatment Plant) from EL - Employment Use (as long as there is no adverse impact on the site as a nature conservation area) to LSIS - Locally Significant Industrial Use (which does not protect the nature conservation value of the site).

I object, very strongly, to this re-designation as it would very likely mean that the area would lose a valuable natural resource, as any developer under LSIS would have no obligation to protect any of the existing flora and fauna. The site has Grade 1 of Borough Importance for Nature Conservation and as Haringey has only 9 such sites it would be a loss to the borough as a whole - not just the immediately surrounding environment.

The long abandoned sewage treatment plant has been reclaimed by nature and provides a habitat for some rare and protected plants and animals (e.g. bee orchids, golden dock, comma butterflies, long-horn beetles and bats) as well as mature trees and more common wildlife.

The danger to the bio-diversity of this Site of Importance for Nature Conservation was pointed out in Hyder Consulting UK Ltd's Sustainability Appraisal (08-22/09/2011) for Haringey Council:

"The site is described as a typically diverse wasteland site, with a high botanical diversity. Several uncommon plants and nationally scarce plants have been recorded here in the recent past. In addition, the site is adjacent to Metropolitan Open Land (MOL) and adjoins an Ecological Corridor and redevelopment of the site would have an indirect adverse effect in wildlife. There are also potential for impacts relating to landscape, biodiversity and water, which should be assessed as part of the redevelopment of this site."

The same appraisal did not present any new evidence to support the re-designation. Indeed no strong evidence for the re-designation has been presented, or evidence that Haringey has considered alternative designations, certainly not in public.

As Pinkham Wood is a site of some ecological and bio-diversity value, failing to protect it would be inconsistent with national policy on such issues:

"Regional and Local Sites

9. Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education. Criteria-based policies should be established in local development documents against which proposals for any development on, or affecting, such sites will be judged."

Office of the Deputy Prime Minister Planning Policy Statement, 9 August 2005

or The London Plan 2011:

Policy 7.18 Protecting local open space and addressing local deficiency

Planning decisions

B The loss of local protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate."

and:

"Policy 7.19 Biodiversity and access to nature

On Sites of Importance for Nature Conservation development proposals should:

... give sites of borough and local importance for nature conservation the level of protection commensurate with their importance."

If the site is of Grade 1 Importance for Nature and worth protecting according to national and local policy, it cannot also be suitable for industrial development which would adversely affect its plants and wildlife, the re-designation is therefore not deliverable.


In addition industrial use of this site would have the potential to greatly increase traffic congestion on one of the worst bottlenecks on the North Circular, and thus air and noise pollution, to the detriment of a densely populated neighbourhood of schools, homes and businesses.

It has been admitted that discussions relating to the proposed North London Waste Authority

and Barnet waste treatment plant and depot have influenced this re-designation. Therefore the suspicion must be that the damage to bio-diversity and natural resources, against national and local policy, not to mention the effect on the local community and environment, has been deliberately ignored in order to facilitate the NLWA and Barnet's proposal.

For all the above reasons, I believe that there is no proper basis for the re-designation and I strongly object to it. I ask that if Haringey Council decide to re-designate Pinkham Wood from EL - Employment Use at all, they will find a designation that protects the natural importance of the site.

Yours sincerely,

 David Parsons
