

From: Liz Partridge [mailto:[lpartridge@haringey.gov.uk](mailto:lpartridge@haringey.gov.uk)]  
Sent: 02 November 2011 22:53  
To: LDF

Subject: objections to change in designation of use

Dear Sirs,

I am writing to object to the change of use being proposed for the Pinkham Way site from EL to LSIS.

The implications of this change include the caveat to protect the nature conservation would be lost. This is a major change to the protection this site would have and consequently there is a likelihood of losing it altogether. This is one of only 9 sites designated Grade 1 of Borough Importance for Nature Conservation in Haringey.

It will widen the range of uses on the site to include heavy industrial type uses with all their potential noise, pollution and traffic congestion.

\* With this new designation, the site would become vulnerable to Policy 4.4 of the London Plan

<<http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%204.pdf>>Policy 4.4 of the London Plan which directs local authorities in London to identify Locally Significant Industrial Sites which might be suitable for eg waste management. If the site was not re-designated LSIS it would not fall within this policy.

I object to this re-designation because:

\* It is not based on robust or credible evidence. No credible evidence was produced by Haringey Council at the Examination in Public earlier this year to support this re-designation, on the contrary, their own evidence strongly recommended protection of all Employment Land.

The re-consultation document CSSD-3, contains no new evidence. Hyder Consulting UK Ltd have produced an updated Sustainability Appraisal report but it does not contain any new evidence to support it. On the contrary, it points out the threat to the biodiversity of the site, see page 6.

<[http://www.haringey.gov.uk/sustainability\\_appraisal\\_core\\_strategy\\_addendum\\_report\\_-\\_final.pdf](http://www.haringey.gov.uk/sustainability_appraisal_core_strategy_addendum_report_-_final.pdf)>Hyder

Addendum SA). The reasons Haringey gave for re-designation were (a) that the change will ensure it is targeted towards more traditional industrial uses (no evidence there is such a

need) and (b) that it complies with pre-application discussions which have already taken place to use part of the site for recycling centre and other part as waste station. Planning applications should not drive local plan strategies, the planning system is plan led.

\* There is no evidence Haringey considered whether this was the most appropriate strategy against alternatives such as Metropolitan Open Space designation – alternative Local green Space designation or Green grid cross boundary green space connecting Barnet, Haringey and Enfield.

\* It is not consistent with national policy: PPS 9  
<<http://www.communities.gov.uk/documents/planningandbuilding/pdf/147408.pdf>>P  
PS

9 is the overarching framework in which policies should be developed - particularly para 9 which states that networks of natural habitats provide a valuable resource. Pinkham Way is a natural habitat and designated as Grade I of Borough Importance.

It does not accord with Regional Policy: See The London Plan Policies 7.14; 7.18; 7.19; and 7.21  
<<http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%207.pdf>>  
Policy 7 (7.14 and 7.18-7.21)

\* 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 (p6 of Hyder Addendum SA). The bigger the development the bigger the impact.

Yours sincerely,

Liz Partridge

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