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1st November 2011
(sent by email and post)

**RE:LONDON BOROUGH OF HARINGEY LOCAL DEVELOPMENT FRAMEWORK
CORE STRATEGY**

**November 2010 (consolidated with further evidence to support changes to the
Employment Land Designations ,September 2011-11-02)**

Response to Consultation 22 September - 3November 2011

Summary of my response.

With regards to Haringey's recent consultation on Proposed Fundamental Changes to Employment Land Designations. I have found no credible or robust evidence for the change in designation of the **Former Friern Barnet Sewerage treatment site** from Employment use to Locally Significant Industrial Use.

I object to the designation of the Former Friern Barnet sewage treatment site, as a Locally Significant Industrial Use .The loss of the protection that exists for this site would have a serious environmental impact to the conservation value of the site and surrounding area.

As one of only nine sites in Haringey considered as being of Grade 1 borough importance for nature conservation the loss of the caveat to protect the nature conservation would drastically alter the natural landscape in this area.

It is not based on robust credible evidence page 28 of the consultation document identifies that the change in designation "complies with pre application discussions that have already taken place "to use part of the site for a recycling centre and another part as a waste station. This makes the document appear as if this has been proposed as a reasonable and acceptable use, this as Haringey have informed us relates to a 300,000 tonne per annum MBT plant and associated refuse depot. We are aware of the current outline proposals for this development and the proposed massive environmental impacts associated with it. Haringey have noted in the consultation document page 30 DEA 2 Bounds Green Industrial Estate the document states "The proposed site (LISIS) will help protect the site from over expansion of retail uses and other non B uses –a problem that is particularly pertinent, given the sites easy access via Pinkham Way and Bounds Green Road". This very statement makes reference to or at least suggests the already congested traffic along these routes would benefit from a LISIS use. This would contradict the LISIS use that is being proposed for the Former Friern Barnet Sewage works a site that is beside Bounds Green industrial estate and shares traffic connections with Pinkham Way. No sound evidence is produced on this matter to suggest that it would be an improvement to have the site designated as LISIS especially knowing that it is proposed to be a waste plant.

In order to assist with the approval of a planning application that has been submitted by Barnet Council and NLWA, Haringey are seeking to re-designate the land use and are aware that it will have a substantial impact on the conservation value of the site. This is a major change from previous Haringey planning policy that sought to protect the nature and conservation value of the site when in 1998 they refused an application because of the associated impacts that development on the site would have. No explanation or evidence is

produced to explain why the sites conservation value has changed? The site if anything has become more valuable in the 13 years since the last application. Therefore it appears that the pre application discussions with NLWA and Barnet Council have been allowed to influence the redesignation of the site, this gives continued grounds for concluding that the consultation would appear to be prejudicial to the interests of fairness and natural justice.

No credible evidence was produced at the Examination in Public and the re-consultation document CSSD-3 has no new evidence. The updated Sustainability Appraisal which has been produced by Hyder Consulting UK in support of this re-designation which in fact points out the threat to the bio diversity of the site.

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 councils own evidence points out, in relation to the Friern Barnet site in particular, that any development on the site has the potential to have bio diversity impacts, because it is a Site of Importance for Nature Conservation. An LSIS designated site proposed next to a public open green space open would render the open space itself un-useable.

Haringey have not considered if alternative designations would be appropriate for example open metropolitan land, local green space, or significantly given the sites strategic position Green Grid cross boundary green space, connecting the three boroughs of Haringey, Enfield and Barnet.

National policy has recognised that networks of natural habitats provide a valuable resource and this should be reflected in the core strategy, and specifically in the designation of the site.

For all of the above reasons the redesignation of the site is not soundly based.

Yours Sincerely

Alan Peacock