

From: Kimberley Pyper

Sent: 31 October 2011 12:53

To: LDF

Cc: Cllr Kober Claire (Leader of the Council)

Subject: Re-designate the Former Friern Barnet Sewage treatment site

Good Afternoon,

I feel very strongly regarding Haringey Council proposal to re-designate the Former Friern Barnet Sewage treatment site (Pinkham Wood) from EL - Employment to LSIS - Locally Significant Industrial Use

I strongly object to this re-designation.

The implications of these changes are:

- **Health issue especially for the young and old.** For many years myself and my children have played in the park next to the site, although close to the A406 the woods provide a buffer to the noise and the pollution, widen the range of uses on the site to include heavy industrial uses, with all their potential for noise, pollution and traffic congestion. Re-designation could cause a loss of the woods and the protection it brings to the neighbouring area thus increasing health issue especially for the young and old.
- **Loss of important for Nature Conservation.** Also until recently we were able to walk in the woods allowing the child to observe nature at first hand, bats have been seen flying at dusk, the loss of the protect nature conservation is a major change to the protection this site would receive and, consequently, there is a likelihood of losing this ecologically rich and valuable site, which is one of only nine Haringey sites designated Grade 1 of Borough Importance for Nature Conservation.
 - **Re-designation will mean the site will become vulnerable** 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.

I strongly object to this re-designation for the following reasons:

- **In terms of being a “well used industrial area”** which is apparently one of the criteria for LSIS designation, an area which has been wild backland for fifty years does not seem to us to qualify for this description. Until a security fence was put up round the site, relatively recently, the area was used for walking, playing, observing wildlife etc
- **The justifications for the designation should be prior to not after pre-applications.**

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 is not a justification for a change in designation. The justifications for the designation should be prior to, and independent of, any actual or intended applications. All this says is "somebody wants to develop here – let's fix the LDF so that it can carry on". This very approach should in itself render the document unsound as it suggests an order that is contrary to that suggested in PPS 12. (mostly Section 4.2 ff.)

- **It is not based on robust or credible evidence.** No credible evidence was produced at the first 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 Limited to provide further evidence in support of this re-consultation does not contain any new evidence to support this re-designation; on the contrary, it points out its threat to the biodiversity of the site – see below.
- **There is no evidence that Haringey considered whether this was the most appropriate strategy against alternatives** such as Metropolitan Open Land designation, alternative Local Green Space designation (or local SLOL designation?) or Green Grid cross boundary green space connecting Barnet, Haringey and Enfield.
- **It is not consistent with national policy:** [PPS 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.
- **It does not accord with Regional Policy:** See The London Plan in particular [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

Regards
Kimberley Pyper

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