

2 November 2011

LDF Team
London Borough of Haringey
River Park House (6th floor)
Wood Green
London
N22 8HQ

Dear Sir/Madam

I am writing to set out my response to the consultation referenced below:

**London Borough of Haringey Local Development Framework – Core Strategy
Publication of a Development Plan Document (Regulation 27) – additional Regulation
27 on Affordable Housing & Employment Land Designations - November 2010
(consolidated with further evidence to support changes to the Employment Land
Designations, September 2011)**

Response to Consultation 22 September – 3 November 2011

Firstly,

I would like to point out that I have not been formally consulted by Haringey Council on either what has been referred to as the first round of Core Strategy Fundamental Changes or the so-called “Revised Consultation dated 22 September – 3 November 2011”. I have only been made aware of this process through my contact with other residents in the community.

You should also note that I have not been consulted in spite of assurances from Haringey Council that I would be consulted as I live very close to the site in question, Pinkham Way (or Pinkham Woods as I know it). I believe that “*in the interests of fairness and natural justice*” I should be consulted. Perhaps it is because I live on the Barnet perimeter of the site that you think my considerations are irrelevant and immaterial. If this is your view I certainly do not agree.

Furthermore, I have on record from the leader of Barnet Council (and Cabinet Chairman), Cllr Richard Cornelius, that residents living in Barnet who would be affected by this proposal would be consulted by Haringey Council. He has confirmed to me that Haringey Council have agreed that such a consultation would be carried out. In practice no such consultation has been made by Haringey which affects not only me but tens of thousands of people. I also understand that no such consultation has been made by Haringey with those living on the Enfield perimeter which would also minimise the number of comments, responses and objections that Haringey could receive from a similar number of residents from each of these Boroughs.

Community involvement and engagement by Haringey Council has been woefully lacking and practically non-existent. It appears to me that Haringey's "strategic approach" to the community has been to lock the community out of the process as much as it possibly can.

Please note that Freedom of Information requests which have been made to Haringey Council have either been ignored or are currently outstanding.

Additionally, I have seen no evidence that Haringey have undertaken timely, effective and conclusive discussions with relevant delivery agencies in relation to the requirements laid down in PPS12. Such agencies would be, The Environment Agency, English Heritage, Natural England; physical infrastructure delivery agencies such as the Highways Authority, Network Rail and Social infrastructure delivery agencies such as the education departments, social services, primary care trust, acute hospital trusts, strategic health authority, the Police, charities etc.

Altogether, this approach adopted by Haringey Council is in my opinion, unlawful.

Secondly,

I strongly object to the proposed change to the designation of the Pinkham Way site which Haringey want to become a Locally Significant Industrial Site. I ask that this proposed change is deleted.

The site is in fact presently designated by Haringey Council as "Grade 1 Borough Importance for Nature Conservation value". How suddenly, with no credible or robust supporting evidence, can the designation of this site be reversed by a whim or some political edict?

This also, in my opinion is unlawful.

For those who know the site (rather than someone who sees it only as a red line on an OS map), the land is a mature green space and natural habitat for protected species. Notwithstanding this fact it also acts as an oxygenating "lung" for the surrounding residents who live adjacent to one of the most polluted roads in London (the North Circular). It has multiple social, environmental (and therefore economic) benefits.

Haringey's proposals to reverse this designation (and use) would seriously and substantially compromise the networks of natural habitats that have evolved over the past 50 years or so since the site was vacated. It would also have a serious negative impact on the health and well-being of a large portion of the electorate.

For these reasons I strongly oppose one of the apparent intentions (or consequences) of the proposed change in designation to remove the caveat that the site's use should be '*subject to no adverse effect on the nature conservation value of the site*'. This existing caveat is not listed or mentioned anywhere in the consultation document, nor is it highlighted that the loss of the caveat is a major change to the protection this site would receive if a planning application were submitted. The consultation document also fails to mention anywhere that the site has the status of "Grade 1 Borough Importance for Nature Conservation value".

On this basis I ask that the site should be retained as open space - a use it has enjoyed for almost 50 years. I ask that it is designated as an extension to the existing Metropolitan Open Land and managed as a nature conservation and education resource for local people including schools.

Thirdly,

It is evident that Haringey Council wish to fundamentally change (and reverse) the designation of this site in order to pave the way for developing what will probably be the largest MBT (Mechanical and Biological Treatment Plant) in Europe which will process the waste from seven North London Boroughs. In fact Haringey Council have stated that they are currently in the process

of validating a Planning Application from the North London Waste Authority for this very purpose. I understand that this proposed industrial complex will also have a very large vehicle depot attached to it and both facilities are intended to operate 24/7.

Clearly, this wrongly and abusively inverts the plan-led system established in the Planning and Compulsory Purchase Act 2004 and PPS12. It is obvious that this has been led by the fact that a developer wishes to develop the site for recycling / waste facilities rather than considering whether (in accordance with the tests set out in PPS12) the site designation and allocation would be sound. There is no evidence base at all justifying the proposed designation and allocation of Pinkham Way for industrial use.

In fact, in a letter (dated 6 July 2011) from the GLA to the North London Waste Authority (which includes Haringey Council and is also the Applicant for the aforementioned Planning Application which Haringey are currently validating for Pinkham Way) the Mayor of London has highlighted a more appropriate and sustainable location elsewhere. This alternative location would also have a much greater potential to reduce transport emissions in North London because of its infrastructure links.

Lastly,

Should the "Authorities" determine to steam-roll through these proposed changes to the Core Strategy without heeding the civic voice and with a huge democratic deficit whilst in violation of National and Local Planning Policies, it will ultimately lead to the ghetto-isation (breakdown and fragmentation) of our neighbourhoods and communities (Haringey, Barnet and Enfield) and the erosion of our open spaces. This will be at some considerable long-term cost to the economy and apply additional strains on the public health system that should not be under-estimated.

It is my understanding that the Town and Country Planning system exists to regulate the development and use of land in the public interest. The public interest requires that all development (de facto, Land Use) is carried out in a way that would not cause demonstrable harm to interests of acknowledged importance.

I trust that in this case the principles upon which good, healthy and prosperous communities flourish, will prevail.

A copy of this letter has been sent to The Planning Inspectorate.

Yours faithfully,

Paul A. Scott *BSc Hons Dipl Arch Cert APDM RIBA*

cc: The Planning Inspectorate