

From: KK |

Sent: 26 October 2011 13:27

To: LDF

Subject: Re-designation of the Former Friern Barnet Sewage treatment site (Pinkham Wood)
Dear Sir/Madam

Haringey Council are re-consulting about its proposal to re-designate the Former Friern Barnet Sewage treatment site (Pinkham Wood)

from *EL - Employment Use* (subject to
"no adverse impact" on the nature conservation value of the site)

to *LSIS - Locally
Significant Industrial
Use* (with no linked protection for the nature conservation value of the site).

The implications of these changes are:

- The loss of the caveat to protect the 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.
- It will 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 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:

- **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.

In the Core Strategy pre-submission draft the site was designated Employment Land with supporting evidence for this designation. Why did the Council change the designation following consultation? What evidence emerged to persuade them the designation should be changed to LSIS?

By their own admission 'pre-application discussions' have influenced this re-designation. These discussions relate to the proposal by North London Waste Authority and Barnet Council to construct a massive MBT waste processing plant (to deal with up to 300,000 tonnes of waste per year) and Barnet Council's proposal to relocate its refuse vehicle depot (for vehicles it uses for waste collection and passenger transport and for parking space for Barnet Council's fleet of refuse/ recycling and staff vehicles, plus a small office/storage building and a refuelling station).

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

Yours faithfully

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