

From: Nick

Sent: 24 October 2011 17:45

To: LDF

Cc: Allison.ingham@pins.gsi.gov.uk

Subject: Comments: Haringey Council re-consultation re: change of land designation for DEA6 from employment land to locally significant industrial site.' Pinkham Way

Attachments: Correspondence Ciara Whelehan.pdf

Comments regarding the re-consultation exercise regarding Haringey's Core Strategy ('employment land designations in SP8 Employment of the Core Strategy, change of land designation for DEA6 from employment land to locally significant industrial site.')

I wish to place on record my opposition to Haringey Council's decision to re-designate Pinkham Wood from EL - Employment Use to LSIS - Locally Significant Industrial Use.

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

The loss of the caveat with in the EL designation to protect the nature conservation is a major change to the protection this site currently receives. I believe that if the re-designation takes place there is a significant likelihood this ecologically rich and valuable site, one of only nine Haringey sites designated Grade 1 of Borough Importance for Nature Conservation, will be lost.

The re-designation would widen the range of uses on the site to include heavy industrial uses, with the associated noise, pollution and traffic congestion that this would bring.

Re-designation would also make the area vulnerable to [Policy 4.4 of the London Plan](#), meaning it would be considered suitable for waste management. If the site is not re-designated LSIS, it will not fall within this policy.

There is no robust or credible evidence to support re-designation. No credible evidence was produced at the first Examination in Public, and the re-consultation document (CSSD-3) contains no further new evidence. The updated Sustainability Appraisal (produced by Hyder Consulting UK Limited) to provide further evidence in support of this re-consultation contains no new evidence to support this re-designation; on the contrary, it points out its threat to the biodiversity of the site.

In the Core Strategy pre-submission draft the site was designated Employment Land with supporting evidence for this designation. Haringey Council changed the designation following that consultation but has not explained to residents why this change was made. They have failed to provide any evidence to support this important change of designation. However, 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 MTB 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).

Haringey Council have failed to indicate whether they considered this 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.

The re-designation is not consistent with the current national policy. [PPS 9](#) is the overarching framework in which policies should be developed - particularly paragraph 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 and there are proposals for this site which would have immense impact.

In terms of the way Haringey Council has carried out consultation and re-consultation I share the significant concerns of the Planning Inspectorate. As a resident and council taxpayer of Haringey I have had no uninitiated contact from the Council to advise me that they are attempting to re-designate this large piece of land near my home in such a manner that would leave it vulnerable to industrial use by a waste plant.

The initiated contact I did have was lacking in any form of guidance, merely an email with a link. Most unsatisfactory and strictly the bare minimum required by law.

I have written to Ciara Whelehan, Haringey's Planning Policy Team leader and asked why the Council has been so reticent in publicising both the consultation and the re-consultation. I received no reply to my first email and only on re-prompting was I given any acknowledgement of my concerns, with no promise to publicise the re-consultation wider as requested. The response was finally received well outside the Council's own stated response times and I can only assume that this delay was intended to reduce the amount of time available for me to comment on the core strategy – certainly no explanation was given why my initial email had clearly been received but the questions had not been responded to. I have attached a copy of the

emails in question.

I find the arguments as to why Haringey believes it has discharged its responsibility to encourage residents to engage more widely in the planning process to be both weak and unsatisfactory. Indeed it would appear that once again Haringey Council has tried as hard as it can to minimise the publicity given to both consultations.

Given that the Council previously leafleted local residents when it wished to implement small scale local traffic-flow changes and given that the Council has complete editorial control of the borough Magazine, delivered to all residents during the re-consultation period, in this instance it actively chose not to publicise the re-consultation using either method, despite criticism from the Planning Inspectorate about how the Council had provided minimal publicity regarding the original consultation. I find it impossible to accept that given its actions in relation to publicising this re-consultation the Council wished to embrace its 'commitment to ensure that consultation reaches more people' and its commitment to 'improving communication channels between the Council and the local community.' as detailed in its own 'Haringey Statement of Community Involvement (2011)'.

There seems to be no material difference in the steps the Council has taken to ensure local residents are aware of their opportunity to comment on both the Core Strategy and the re-designation of this site, than it took last time when its strategy was officially deemed unfit for purpose.

The re-designation should be rejected because it is not soundly based, it is not fit for purpose and due to the way the council has carried out both the consultation and re-consultation it has been done in a way that is prejudicial to the interests of fairness and natural justice.