

LDF Team,

London Borough of Haringey

To Whom It May Concern,

This is my response to the LBH consultation on fundamental changes to their Core Strategy (22 September – 3 November, 2011).

I would like to object to proposals to redesignate woodland at Pinkham Way as a Locally Significant Industrial Site, and proposals to strip the site of its current conservation status by removing the caveat ‘...subject to no adverse impact on the nature conservation value of the site’.<sup>1</sup>

A site of such longstanding and agreed (including by LBH themselves) ecological value, in such proximity to other woodland, Metropolitan Open Land and a borough-wide Green Corridor, is clearly a rare asset, and should continue to be treated as such. Particularly in a borough that is as short of green space as Haringey. There has been no change in evidence to suggest that this status is no longer relevant.

As to the employment status, it is surely telling that despite a recent 15 years or so of economic growth, no development has been forthcoming on the site. I believe that LBH have even used the conservation value of the site as part of their reasons for turning down planning applications on the site during this time! Why are they now trying to remove this water down this conservation value? There is no evidence to suggest that it has lost any of its biodiversity, or that rich green space of this sort is not needed in the borough. It would surely make more sense to remove the employment designation, and leave the site as what it is - a valuable woodland, in keeping with its immediate surroundings, and already used by local people as such for decades.

A new Core Strategy must be the ideal time to designate this site properly – as valued green space of some kind, either according to current designations, or, under the new planning regulations due to take hold in 2012. The space could be improved on, used by the many local schools, and formally integrated into the adjacent Green Corridor that it is obviously a valuable part of. It could also be used to increase pedestrian and cycle access to the Friern Barnet Retail Park from the north of Haringey; surely a good thing for residents, businesses, the area, and the environment.

The main reason that LBH have given for the redesignation is that it:

“Complies with pre-application discussions which have already taken place to use part of site for recycling centre and other part as waste station.”

It has become clear, after the initial, flawed consultation on these proposed changes (late 2010), that this relates to plans to build a huge MBT and composting facility and Barnet vehicle depot on the site. Surely, this is completely upside down. A specific application for a site should not be having this sort of influence on underlying planning strategy.

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<sup>1</sup> It is of note that what the Council’s actual intentions for the nature conservation of the site are has been extremely difficult to determine from the consultation documentation. The Council could even be leaving itself open to suggestions that it has tried to deliberately confuse consultees.

If there is no other compelling evidence for a change to industrial, it would be very difficult to escape the conclusion that the proposed designation change to LSIS is directly linked to these specific waste plans, and is being proposed in order to make them possible or easier to carry out. Indeed, LSIS is precisely the type of land that the Mayor recommends for waste usage in the latest version of his London Plan (July 2011).

I would like to object to the redesignation to LSIS for the following reasons:

-There is no credible evidence for the change This has already been pointed out by the inspector after the first Core Strategy EiP, and in the documentation for the second consultation (CSSD-3), there is no new evidence. Similarly, an updated Sustainability Appraisal for the second consultation does not contain any new evidence to support the designation change, and actually stresses the biodiversity on the site.

-There is no evidence that LBH considered alternatives in order to find this the best strategy There is a strong case for making the site Metropolitan Open Land, or other green space designation (such as Green Grid cross-boundary with Barnet and Enfield) , in keeping with its biodiversity, its proximity to other green spaces and to a Green Corridor.

-It is not consistent with national or regional planning policy See PPS9, and the London Plan 2011, particularly Policy 7 (7.14 and 7.18-7.21)

-It is not deliverable Unless the Grade 1 Borough Importance for Nature Designation is removed or ignored, it is not possible to develop this site for heavy industrial process. The Council's own evidence base ([http://www.haringey.gov.uk/sustainability\\_appraisal\\_core\\_strategy\\_addendum\\_report\\_-\\_final.pdf](http://www.haringey.gov.uk/sustainability_appraisal_core_strategy_addendum_report_-_final.pdf)) points out that any development on the site has potential to have biodiversity impacts. And the bigger the development, the bigger the impact will be. But there is no evidence to suggest that the nature designation should be removed.

Yours faithfully,

Guy Veale