

Dear Sir or Madam,

**Haringey Local Development Framework (LDF) Public Consultation
Town and Country Planning (Local Development) (England) (Amendment) 2008
Publication of a Development Plan Document (Regulation 27) Haringey's Core Strategy
Revised additional Regulation 27 on Fundamental Changes to Employment Land Designations and
Affordable Housing**

With reference to the above revised consultation upon Core Document CSSD-03 and the Sustainability Appraisal, as a local resident I should like to express my strong opposition to the change in Employment Land Designation of the site in Friern Barnet, N10 (the Pinkham Way site). This change would alter the site from designation EL – employment use, to LSIS – locally significant industrial use.

The site is described in the Sustainability Appraisal addendum document (henceforth referred to as the SA Addendum) as a brownfield site. However, its last industrial use was around fifty years ago, when it was the site of a sewage treatment plant. Since the closure and clearance of this plant, the site has returned to nature; to quote the SA Addendum, “ecology has taken over the site, creating a green area” (page 19). The site is described in that document as having “high botanical diversity”, with “(s)everal uncommon plants and nationally scarce plants” (page 6). The site also has some ancient trees, which were probably originally part of the same woodland as Bluebell Woods, south of Muswell Hill golf course. In addition to a rich diversity of plants, the site is home to bats and a very wide range of birds and invertebrates (SA Addendum page 18), some of them uncommon. The importance of the ecology of the site has been recognized by Haringey Council, which has designated the area a “Site of Importance for Nature Conservation” (SINC).

Given this SINC designation, and the additional concerns expressed in the SA Addendum about the potential impact of any development on landscape, biodiversity and water resources (pages 6 and 19) and the fact that “redevelopment of the site would have an indirect adverse effect in (sic) wildlife” (page 6), it is perplexing as to why the decision has been made to change the status of this site from EL to LSIS and to remove any reference to the need to preserve the nature conservation value of the site.

Moreover, in paragraph 5.1.10 of the document “Revised consultation on core strategy CSSD-03 document Sept 2011” (henceforth referred to as CSSD-03), it is stated that Locally Significant Industrial Sites (LSIS) are “well-established industrial areas”. This is simply not the case with the Friern Barnet, N10 site: this site has been vacant and allowed to revert to nature for around 50 years so cannot sensibly be described as a “well-established industrial area”. Therefore, the designation of LSIS is not appropriate; hence, **the document is not sound**.

No robust or credible evidence is provided in either the SA Addendum or the CSSD-03 documents justifying the change of status from EL to LSIS. The only attempted explanation of the change that I can find is on page 34 of CSSD-03, where the claim seems to be that the change to LSIS status will prevent this site being used for large retail uses more suitable for town centre locations. This seems an extremely weak justification for reclassifying a SINC site as ‘industrial’; surely, there is a better way for planners to avoid large retail developments in locations deemed undesirable for such developments

than designating any available land as for industrial use only! In any case, this goal of avoiding retail development is not 'evidence'; it is merely an aim. Thus, not only is **the change in designation not justified by any evidence** at all, let alone robust or credible evidence, but alternative means of preventing a large retail development on the site have been ignored.

Indeed, given the comments in the SA Addendum about the impact of development on the ecology of the Friern Barnet site, there would seem more justification in changing its status to that of Metropolitan Open Land or Significant Local Open Land, or to acknowledge its connection with green spaces to the south and to the north west ("the site is adjacent to Metropolitan Open Land and adjoins an Ecological Corridor": page 6 of SA Addendum) by giving the site a designation of Green Grid cross-boundary green space. **These alternatives do not seem to have been considered** but they would clearly achieve the stated aim of preventing a large scale retail development at the site.

The discussion in paragraphs 5.1.23 and 5.1.24 about the opportunities available in the Upper Lea Valley suggests that there are many alternative locations that could provide increased employment opportunities in the area; again, **these alternatives do not seem to have been taken into consideration** when considering the proposed re-designation of the Friern Barnet N10 site. Thus, **the document fails to have ensured that it proposes the most appropriate strategy when considered against the alternatives.**

The re-designation of a SINC site as LSIS is inconsistent with national policy on biodiversity as set out in the government's Planning Policy Statement 9 on biodiversity and geological conservation, published in 2005. This states that the Government's objectives for planning are:

- to conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support.
- to contribute to rural renewal and urban renaissance by:
 - enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being; and
 - ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment.

Industrial use of the Friern Barnet site would do the opposite of "sustaining and (.....) improving the quality and extent of natural habitat"; it would damage and may even extinguish, locally, populations of naturally occurring species. In addition, it would mean the area could no longer offer the quality of life benefits discussed in the second bullet point and it would have a negative effect on biodiversity, as acknowledged on page 6 and in the final conclusion of the SA Addendum, page 21. Thus, **the relevant section of the document is not in keeping with national policy.**

The options for mitigating damage to the nature conservation value of the site suggested in SA Amendment page 18 are unrealistic. For example, developing the site for industry but avoiding sensitive areas is unrealistic because most industrial uses and in particular, the proposed waste treatment plant and vehicle depot, would occupy a large proportion of the site and 'sensitive areas' in ecological systems cannot survive as small, isolated 'islands' of wildlife in the middle of an industrial site. Translocation of some species or creating a new habitat elsewhere are also unrealistic because what the SINC designates is this particular site; it cannot simply be reproduced elsewhere. The nature of ecology is that the

habitat system as a whole is very finely balanced, interconnected and sensitive to manifold influences. Moreover, conditions (soil, wind, rainfall, air quality, temperature, the presence or absence of other species) differ significantly, even within quite small distances, and minor differences in such conditions can make a huge difference to the system as a whole (the butterfly effect). Thus, it is almost impossible in ecology simply to create an identical eco-system somewhere else. Even the removal and planting elsewhere of one or two species is unlikely to work – again, their ecological niche is the entire Pinkham Woods habitat and the fact that they are rare means they are unlikely to thrive elsewhere. Since these mitigation strategies are unrealistic and therefore **not effective**, the relevant section of **the document is not deliverable**.

The redesignation of the site and the ensuing loss of biodiversity and green space, as the site is developed for industrial use, **contradicts** several parts of the **London Plan**, including Policies 7.18 and 7.19.

The change in status also fails to comply with Haringey's Sustainable Communities Strategy which states that, "We will protect biodiversity and enhance our landscapes with more trees" (page 10). It also fails to comply with several of the sustainability objectives used in the Sustainability Appraisal (and presumably representing outcomes of importance to the Borough). The objectives on which the change in status of the site will most obviously have a negative impact include: providing a network of quality, accessible open spaces, improving access to cultural and leisure facilities, linking and enhancing habitats and wildlife corridors, and improving the amenity and connectivity of walking and cycling routes. Thus, the relevant section of the document **is not in line with the objectives set out in Haringey's Sustainable Community Strategy** and seems to contradict the SINC designation and other explicit objectives of the Council, as inferred from the Sustainability Appraisal.

In summary, the proposed change in Employment Land Designation of the Friern Barnet site from EL to LSIS is **unsound** because it is not an established industrial site. Moreover, the proposed change is **not based on robust or credible evidence**, the **alternatives have not been considered** and **it does not appear to be the most appropriate strategy** when the alternatives are given consideration; the proposed change is **not in keeping with national policy**, with the **London Plan**, with **Haringey's Sustainable Communities Strategy** nor with other aspects of Haringey's policy; and the proposed mitigation strategies are **not effective** and mean that **the document is**, in fact, **not deliverable**.

I hope that the above objections are clear and that the proposed change of status of the Friern Barnet site will be withdrawn.

Yours faithfully,



Carolyn Whitehead