

Panning Policy Team
Level 6, River Park House
225 High Road
London, N22 8HQ

Sent Via email to: ldf@haringey.gov.uk

07 March 2016

Dear Sir/Madam,

Re: Consultation on Haringey Local Plan

CPRE London is a membership based campaigning charity, a Branch of the national charity Campaign to Protect Rural England, concerned with protecting and enhancing London's Green Belt, Metropolitan Open Land, parks, green spaces and green infrastructure, and achieving compact, green urban communities to help prevent sprawl into the countryside.

Thank you for the opportunity to respond to this important consultation.

CPRE London has found much to support in the documents presented, and has highlighted a number of these below. However, we do also have specific concerns as detailed.

1. Alterations to strategic Policies 2011-2026

- Alteration 6, in Table 1, appears to remove "continued support for the protection of the green belt, metropolitan open and other green and open spaces". This still remains a key commitment of the Mayor's London Plan and should therefore be retained.

2. Development Management DPD

- Policy DM20, Point A, should reiterate those policies laid out in Policy SP13, in particular in relation to Green belt and Metropolitan Open Land (MOL). Additionally, the text in Point A, relating to granting permission that result in the loss of open space where the open space has been assessed as being surplus to requirements, does not hold for these two designations which receive the strongest protection in the London Plan and National Policy: Green Belt and MOL is protected from inappropriate development, unless exceptional circumstances can be proven. **The text of this section should be amended to reflect the strongest protection afforded to Green Belt and MOL.**
- Under Point B of Policy DM20, an additional criterion should be added on the basis of significant community consultation and recognition of their support.

3. Site Allocations DPD

- 2.1.3: We support the proposed green chain linking Wood Green Common to the old rail line between Cumberland/Wolseley and Bradley/Barrett roads and Trinity Gardens as an important part of the Green infrastructure network
- 2.16: We support the statement on bringing back underused brownfield land; this must be the first priority for providing new homes in the Borough. **An additional line should be added to reflect a Brownfield first policy.**
- We support a number of proposals, including SA25, SA27, SA28 and SA31 where by a commitment is made in the plan to protect and enhance adjacent green spaces, including designated Green Chain and SINCs. **This commitment, to enhance the adjacent green spaces, should be extended to SA23, SA30, SA40 and SA54 to ensure consistency within the local plan.**
- SA39: We are concerned about the inclusion of the wooded area and would support the inclusion of a support for proposals that preserve and enhance the trees at this site in line with policy.
- SA41: **We are concerned about the potential loss of Metropolitan Open Land at High Gate School. The Site Allocation should include a provision for the future SPD that ensures that the Metropolitan Open Land is protected and enhanced through any proposals for school expansion.**
- SA60: We are concerned that the comments do not go far enough to ensure that future proposals protect the MOL: additional criteria to the justification of impact and mitigation allowances should include **reference to a need to illustrate very special circumstances.**
- We have received a number of comments from local residents in relation to SA62, Broadwater Farm. Whilst we are pleased that original plans that included parts of Lordship Recreation Ground have been removed, estate regeneration must take into account the needs of local residents.
- We support the inclusion of Table 10 in Schedule 6. This provides an important resource to measure any loss or gain of Green Belt and Metropolitan Open Land in the future. We similarly support the inclusion of Table 11 on Significant Local Open Land and 12 on Ecologically Valuable Sites. We would urge the Council to ensure such data is shared with the Greater London Authority and Greenspace Information for Greater London (GiGL).

We look forward to responding to future stages of the Local Plan review.

Yours Faithfully

Rebecca Pullinger

Green Belt Campaigner
CPRE London

