



RSPB



Green Woodpecker
breeding on Pinkham Way



Song Thrush
breeding on Pinkham Way



RSPB



Bullfinch
Identified on Pinkham Way

PINKHAM WAY ALLIANCE

**Representations on
London Borough of Haringey
Main Modifications to:**

**Alterations to the Strategic Policies;
Development Management DPD;
Site Allocations DPD**

13 January 2017



**No of Cinnabar
Moths have fallen
by 83% in the last
35 years**

<https://www.norfolkwildlifetrust.org.uk/wildlife-in-norfolk/species-explorer/terrestrial-invertebrates/cinnabar-moth>

**Cinnabar moths on Pinkham Way
classified as a Priority Species in the UK BAP**



**Slow worms
on Pinkham
Way**

classified as a Priority Species in the UK BAP
Protected in the UK under the Wildlife and Countryside Act,
1981

The Pinkham Way Alliance (PWA) is an alliance of residents' associations, businesses, schools, community groups and individuals which has been engaged with the Council and others since early 2011.

At that time a small number of people living in the vicinity of the Pinkham Way site became concerned about plans by the North London Waste Authority (NLWA) and Barnet Council to develop the site for a large scale MBT waste facility and Waste Transport Depot.

The PWA has more than 3000 supporters. The membership is drawn largely from the residential areas that would be most directly affected by the loss of this important site of importance for nature conservation and by any major development on the site.

Stephen Brice
Chairman
January 2017



Pinkham Way site – woodland path

Contents	page
1 Introduction and context	4
2 Summary of Representations	5
3 Schedule of Modifications to the Development Management DPD: November 2016 - DM Mod 48 Paragraph 4.15	7
4 Schedule of Modifications to the Site Allocations DPD: November 2016 SAMod 99 – SA52	8
5 Schedule of Modifications to the Alterations to the Strategic Policies: November 2016 Alts Mod 19; Alts Mod 21; Alts Mod 22 and Alts Mod 23	16
6 North London Waste Plan – current position	19
7 Crossrail/TfL update	20
8 North London Waste Authority	21
9 Summary	22

Appendices (attached - pages 23,24 and 25 below)

- 1 Email LBH to E Ryan, May 26th 2015
- 2 LUC, LBH Open space and Biodiversity Study 2014, Initial SINC assessments
- 3 Haringey Nature Conservation Officer Comments on Reg 18 SADPD October 2014 (refers to site SA47, now retitled SA52)

1. Introduction and context

- 1.1 These representations are submitted on behalf of the Pinkham Way Alliance in response to the public consultation on the proposed modifications to the Alterations to the Strategic Policies, the modifications to the Site Allocations Development Plan Document and to the Development Management Development Plan Document.
- 1.2 The context in which they are prepared is the public examination hearing into the Site Allocations DPD on 31 August, and, the comments made by the Inspector during that hearing following Haringey Council's agreement to remove the Pinkham Way site (SA52) from the Site Allocations DPD.
- 1.3 The Inspector explained that although the Pinkham Way site had been removed from the Site Allocations DPD, the employment designation on the site would not automatically be removed. After further discussion, the Inspector advised that she would deal with employment designation issues on this site under Strategic Policy.
- 1.4 Whilst these representations deal with alterations to the three policy documents, they focus mainly on the proposed alterations to Strategic Policy SP8 and in particular on how they affect the Pinkham Way site.

2 **Summary of representations**

- 2.1 PWA considers there is no justification for retaining the Employment Land designation on the Pinkham Way site and urges the Council to remove it and to delete all reference to the site from Policy SP8 and from the proposed modifications to that policy.
- 2.2 During the recent Examination in Public of the Site Allocations Development Plan Document (which gives effect to Haringey's Local Plan strategic policies and which is "based on sound objective evidence"), the Council agreed to remove the site from the Plan Document because it was unable to justify its inclusion.
- 2.3 Its removal, together with the Council's statement that it is not required for housing either demonstrates that the site is not required to contribute to delivery of the Council's strategic policies on housing or employment over the life of the plan.
- 2.4 The site is unsuitable as an employment development site and in particular does not meet the criteria set out in Alts Mod 19 for land identified as suitable to meet the forecast demand for additional B Class floor space.
- 2.5 Retention of the Employment Designation on Pinkham Way is contrary to national and regional policies and is not supported by the Council's own strategic policies, and proposed alterations to those policies. Nor is it compatible with its nature conservation designation and environmental value which has recently be confirmed by studies undertaken on behalf of the Council and Pinkham Way Alliance.
- 2.6 Material changes have taken place since Inspector Seaman completed the EiP on the Council's Strategic Plan in 2012 in relation to the North London Waste Plan, the Waste Authority's procurement, the emergence of Crossrail etc. In addition, Atkins have substantially changed their position on the suitability of the site for employment designation and the Council has had the benefit of having a site specific viability assessment carried out on Pinkham Way.
- 2.7 The value of the site as a SINC of borough wide importance and its uniqueness in the borough have now been confirmed following a review of the site in 2013¹. The Inspector had to rely on a Review done in 2003.

¹ LUC, LBH open space and biodiversity study 2014 – initial SINC assessments – Appendix 2

- 2.8 It is now evident that no part of the Pinkham Way site is required or has been safeguarded for Crossrail2. In any event, Crossrail 2 proposals make it clear that housing is the number one priority for delivery in London as part of the Crossrail 2 development, not employment. The Infrastructure Commission has recommended that the New Southgate extension of Crossrail 2 should be postponed in order to save around £4 billion costs and to allow time for an alternative extension in East London to be considered.
- 2.9 The aspirations of the owners of the Pinkham Way site are not relevant considerations when preparing the borough's strategic plan and any modifications or alterations to it.
- 2.10 The draft North London Waste Plan is currently in the early stages of preparation and consultation and although the Pinkham Way site is identified in that draft plan as a potential area where waste facilities might be located, the evidence to date indicates its inclusion is not justified.

3 DM Mod 48 paragraph 4.15 – extract below

Amend paragraph 4.15 as follows:

The population in Haringey is projected to increase by approximately 75,000 people between 2015-2035. The additional population will be accommodated through the promotion of more compact urban development on existing brownfield land. This, however, should not lead to a reduction in amenity and places greater priority on the need to protect and maintain a well-distributed, well-connected and accessible supply of open space. will place pressure on local services, including open spaces. In this context, it is important that the Council prioritises the protection and enhancement of the Borough's open spaces, as well as improving public access to them. For this reason, open space does not fall within the NPPE definition of 'brownfield / previously-developed sites', although brownfield sites that exhibit open space characteristics offer the potential to secure further provision upon redevelopment.

3.1 The modification as currently worded is incorrect and confusing. There is no definition of brownfield sites in the NPPF. That defines PDL only. Brownfield land is defined only in the London Plan, which also defines PDL.

3.2 We suggest the following wording is substituted

“ Brownfield sites or previously developed sites that exhibit open space characteristics are excluded from the definition of Brownfield land in the London Plan 2015 and from the definition of Previously Developed Land in the NPPF 2012. Such sites offer the potential to secure further provision of open space upon redevelopment.”

4.1 SA Mod 99-SA52 – extract below

<i>Remove Policy SA 52 from the document</i>	Due to having no identified development over the plan period/ designation as employment land in Strategic Policies. Modification arising from <u>Examination in Public hearings.</u>
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- 4.2 PWA welcomes this modification. However, the description of the proposed change is inaccurate. We believe the reference to “Policy SA52” is incorrect and should read “remove Site SA52 from the SADPD”
- 4.3 The reason given for the modification is irrational. It states “Due to having no identified development over the plan period/designation as employment land in Strategic Policies. Modification arising from Examination in Public Hearings”
- 4.4 If there is no identified development for the site then there is no justification for its inclusion and the reason for removal should be “no justification for inclusion in the document”. PWA would like to see this reason substituted for the existing wording.
- 4.5 The introduction to the Site Allocations DPD sets out the process through which the sites for inclusion have been identified and states at 1.16 that the inclusion of a site is based on supported evidence. It further states at 1.17 that the decision to include sites is supported by a Sustainability Appraisal which tests policies and proposals to assess the impacts that might arise from including a site in the SADPD.
- 4.6 Because SA52 was not only a designated employment site but also a valuable ecological site designated SINC of Borough wide Importance that required protection, particular attention should have been paid to ensuring that there was full justification for its inclusion in the SADPD. The fact that the council was unable to explain at the EiP hearing why it had been included and immediately agreed to remove it reflects the attitude the council has consistently adopted when dealing with this site over many years.
- 4.7 The same careless approach was witnessed earlier last year when the site was included in a schedule of sites proposed to be covered by an Article 4 Direction. In that instance, the council was trying to control the recent relaxation on changes of use from employment to residential. However, the requirements for inclusion in the Article 4 Direction were that a site must be in

employment use at the time the Direction was made. PWA challenged the inclusion of Pinkham Way site in that Direction as the site was not in any use, it had no buildings etc. Again, as soon as they were challenged, the council immediately removed the site from the draft Article 4 Direction.

4.8 We have also dealt with this site under Section 5 below.

5 Alts Mod 23: Alt 110 – Policy SP8 Proposed alterations – extract below

Amend Policy SP8 as follows:

- ~~Friern Barnet Sewage Works~~ Pinkham Way
- Tottenham Hale (Part ~~SIL~~/RA), N17

- 5.1 The alteration proposed simply amends the title of the site listed as “Friern Barnet Sewage Works” to “Pinkham Way”. The site therefore continues to be listed in the Strategic Policy SP8 as a Local Employment Area – Employment Land. Given that the council has agreed to remove it from the SADPD on the grounds that there is no identifiable development over the plan period, this is irrational and contrary to NPPF para 22.
- 5.2 Flagging the Pinkham Way SINC up in Policy SP8 of the Local Plan as one of two sites suitable for employment use, the other one, a well-established industrial estate, is sending out the wrong message to potential developers and is exposing this SINC to risk rather than protecting it.



Pinkham Way SINC



Bounds Green industrial estate

- 5.3 PWA considers that such an unprecedented approach to the protection of a SINC of this significance should require a clear and special justification. No such justification has ever been made out by the Council nor has it ever been argued by the Council that the nature conservation value of the site is materially less

than that of the other Grade 1 SINC in Haringey. All the current evidence demonstrates that this site is unsuitable for an employment designation.

- 5.4 For the reasons set out below, PWA would urge the Inspector to find that the retention of the employment designation LEA-EL on the Pinkham Way site would render SP8 unsound and to recommend its removal.
- 5.5 **MATERIAL CHANGES SINCE THE SITE WAS LAST REVIEWED IN 2012 WHICH ARE RELEVANT TO THE RETENTION OF EMPLOYMENT LAND DESIGNATION ON PINKHAM WAY**
- 5.6 A number of material changes that impact on any decision to retain the employment designation on Pinkham Way have occurred since the last time this site's employment designation was considered at the 2012 Examination in Public into the Haringey Local Plan.
- 5.7 At that time, the Council had proposed that the site be redesignated "Locally Significant Industrial Site". The Inspector (Andrew Seaman) asked how it considered the new designation to be consistent with its nature conservation designation.² The Council never answered the question satisfactorily.³
- 5.8 Following the EiP the Inspector wrote to the Council and commented that there was no sound analytical basis for creating new Locally Significant Industrial Sites at that time."⁴
- 5.9 Later, in his report, the Inspector recommended that the Council use the approaching SADPD to review the Pinkham Way site's status, and that it should, '*In the interim*' retain its LEA designation.⁵
- 5.10 As suggested by the Inspector, the council did review the status of Pinkham Way. During the course of preparing for the Reg 18 public consultation, they sought advice from the Council's Nature Conservation officer, Ian Holt.
- 5.11 In October 2014, Mr Holt advised⁶ that there should be no residential development on the site; that there were no outstanding or exceptional

² Letter from Inspector to LBH, 21.07.11 - http://www.haringey.gov.uk/sites/haringeygovuk/files/letter_from_inspector_21_july_2011__3_.pd

³ Response from LBH to Inspector, 28.07.11- http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_response_to_inspectors_letter.pdf

⁴ Letter from Inspector to LBH, 24.08.12- http://www.haringey.gov.uk/sites/haringeygovuk/files/letter_re_main_mods_3_24_8_12_final.pdf

⁵ Inspector's report, Section 61, p 14 - http://www.haringey.gov.uk/sites/haringeygovuk/files/local_plan_inspector_s_report_dec_2012-2.pdf

⁶

circumstances for housing to be built on a SINC of this importance He also mentioned that the golf course to the south of the site and Hollickwood Park are both SINCs and the ecology of these sites should not be adversely affected. De-culverting of the stream should be a condition of development. He was particularly insistent in his advice that relocation of businesses from Regeneration Areas in other parts of the borough to Pinkham Way would not be acceptable on the grounds that, if existing or alternative sites existed, then a SINC should not be developed.

- 5.12 Mr Holt was clear that if employment uses were not economical for this site then it should remain undeveloped for its ecological importance and the employment designation should be removed. The full content of Mr Holt's advice can be seen at Appendix 3.
- 5.13 This is a long way from the advice the Council claimed to have received from the Nature Conservation Officer at the EiP hearing in August 2016. Commenting on the Inspector's question about whether the site could be developed without harm to biodiversity and nature conservation objectives, the Council responded that it had an email from the Nature Conservation Officer to the effect that it could. No email was produced and no mention was made of the earlier substantial advice to the contrary received in October 2014.

2012 – 2015: SIGNIFICANT FALL IN FORECAST DEMAND FOR FLOORSPACE

- 5.14 In 2012 Atkins forecast that for 125,000 m2 net additional employment floorspace would be needed by 2026. This is 500% greater than the current projections of 23,800 m2 shown in the Schedule of Modifications at AltsMod19 SP8. Any need for this site to contribute to the strategic employment needs of the borough in 2012 had disappeared by 2015.

SUITABILITY FOR EMPLOYMENT USE NOW QUESTIONED BY ATKINS

- 5.15 In 2012, Atkins had said: 'The strategic location of the site, its scale and proximity to other well established industrial sites reflects its potential to become a successful, modern employment site. It offers a unique opportunity for the borough ... Firstly, it gives the market more certainty regarding the types of employment generating uses that will be acceptable at the site. Secondly, the site represents a key component of future supply required to meet long term, strategic employment demand in the borough'.

5.15a Inspector Seaman reflected this position in his report, stating "... the site appears to have the potential to provide some employment opportunities in the west of the Borough".⁷

5.16 By February 2015, Atkins' opinion about the site had radically changed. "... the site does not appear to be an attractive B1 location. It is not close to any London Underground stations and the nearest railway station (New Southgate) is approximately 15 minutes away on foot. Taking the above into account along with the site's land contamination issues and its long history being vacant / derelict it does not appear to be likely to be developed for employment use in the near future as there are various factors affecting the site's prospects of being developed (such as the site's contamination and the corresponding land remediation costs)".⁸

PINKHAM WAY NO LONGER CONSIDERED PART OF VACANT LAND STOCK BY ATKINS

5.17 In the 2012 report Atkins had stated that the site formed some 60% of Haringey's stock of vacant land. However during the EiP hearing they advised the Inspector that removing the site from the vacant land stock would not render the plan unsound.

No doubt in light of that exchange with the Inspector in 2012, Atkins position has now substantially changed and they have left Pinkham Way out of the council's vacant land stock altogether.⁹

ATKINS CONCERNS ABOUT VIABILITY OF THE SITE AS EMPLOYMENT LAND

5.18 In 2015, Atkins considered viability a key issue in the delivery of new industrial premises¹⁰ and against the recommendation for "No Change" to the employment designation on Pinkham Way, added a footnote '*Subject to the results of a detailed development viability assessment*'.¹¹

⁷ Inspector's report, Section 61, p 14 - http://www.haringey.gov.uk/sites/haringeygovuk/files/local_plan_inspector_s_report_dec_2012-2.pdf

⁸ Atkins, Haringey Employment Land Study Feb 2015, Sections 5.40-41, p 25

⁹ Haringey Employment Land Study Final Report February 2015 – Section 5.146, 3rd bullet point, p 39.

¹⁰ Haringey Employment Land Study Final Report February 2015 - Section 4.15 page 19

¹¹ Haringey Employment Land Study Final Report February 2015 - Table 5-9, "Total Occupied B-Class Floorspace in existing employment areas" p38

- 5.19 It is now evident that when Atkins prepared their report they were unaware that a site-specific viability assessment had already been carried out on the Pinkham Way site some months previously by GVA¹².

**100% EMPLOYMENT DEVELOPMENT ON PINKHAM WAY NOT VIABLE
ACCORDING TO HARINGEY COUNCIL**

- 5.20 The council stated that in the GVA Viability Assessment of Pinkham Way, “There was no analysis of a 100% commercial scheme as this returned a negative residual value under any scenario” and explained that the GVA study had analysed a number of scenarios involving residential cross subsidy and that “All of these indicate that an element of a high value use (such as residential) would be required in order to bring forward a viable scheme containing employment As set out in the allocation, further, more detailed analysis will still be required on both the ecological significance of the site and development viability as part of any future development proposal for the site.¹³
- 5.21 Despite the viability evidence in their possession, the Council proposes to retain an employment designation that they know is not viable on the flimsy basis that the owners have said the site can be developed by them as owner occupiers because different development costs apply. The owners have produced no evidence whatsoever of how they might achieve this. The owners’ aspirations are not relevant considerations when developing the Council’s strategic plan.
- 5.22 The site has been in designated employment since the early 1990s and all that time has been in the ownership of Barnet Council who as owner occupiers made various attempts to develop it for housing land and later a waste vehicle depot, both failed. The North London Waste Authority who are now owner occupiers of the majority of the site have already made an attempt to develop the site for waste facilities, but that also failed.

¹² GVA Grimley, Viability Assessment – Pinkham Way, London Borough of Haringey, 31 October 2014

¹³ Email – LBH to E Ryan, 26th May 2015 Appendix 1

- 5.23 There is no evidence that this site can be delivered for employment use. The designation has been carried forward through each Development Plan review for over 25 years without any employment proposal remotely approaching implementation.
- 5.24 The consistency of failure to develop this site, irrespective of ownership, is in itself evidence of its undeliverability.

JULY 2015 COUNCIL STATES PINKHAM WAY SITE NOT REQUIRED FOR HOUSING

- 5.25 The Council stated in July 2015 that “the site is not required to contribute towards meeting Haringey’s revised housing target.”¹⁴ This statement rendered Atkins’ condition for retention of the Employment Designation redundant.

AUGUST 2016 COUNCIL CONFIRMED SITE NOT REQUIRED FOR STRATEGIC EMPLOYMENT OR HOUSING NEEDS OF THE BOROUGH

- 5.26 On 31 August 2016 during the hearing into the Site Allocations Development Plan Document, the Inspector asked the Council to justify the inclusion of the Pinkham Way site in the document. The Council conceded there was no justification for its inclusion and agreed that it should be removed. The removal of the site from that document and the Council’s own statement that the site is not required for housing¹⁵, demonstrate that it is not required to contribute to either the strategic housing or employment needs of the borough over the plan period.

¹⁴ LBH letter to PWA 2015 July 06, page 2, para 4, lines 6-11

¹⁵ LBH letter to PWA 2015 July 06, page 2, para 4, lines 6-11

5.26 (a) AltsMod 19 Alt71 – Policy SP8 – extract below

Amend the beginning of Policy SP8 to read:

The Council will secure a strong economy in Haringey and protect the Borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites, ~~and~~ Local Employment Areas and other non-designated employment sites.

The forecast demand is for an additional 23,800 m2 of B Class floorspace up to 2026,

This forecast demand is to be met through:

- The reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes;
- The intensification of the use of existing employment sites (where possible);
- The provision of B1a/b floorspace as part of mixed-use development on suitable sites, including town centre sites; and
- The protection of existing viable B Class Uses on designated and non-designated sites.

~~The~~ In addition the Council will also:

- ~~Protect B uses (under the Use Classes Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand for an additional of 137,000m2 32,000 m2 of employment floorspace up to~~

5.27 This alteration lists how the forecast demand for 23,800m2 of B-class floor space is to be met.

5.28 The Pinkham way site does not meet the criteria for any of the four categories listed and therefore its inclusion in SP8 as an employment site cannot be justified.

Reconfiguration and re-use of surplus land in B uses.

5.29 There is no existing employment use to be reconfigured or re-used on Pinkham Way, as the site has been vacant since the early 1960s.

Intensification of the use of existing employment sites

5.30 Pinkham Way is vacant land, not an existing employment site.

Provision of floorspace as part of a mixed use development on suitable sites including town centre sites

5.31 There is no floor space on Pinkham Way – the site is vacant. Atkins has advised that Pinkham Way is not a suitable location for B1¹⁶

The protection of existing viable B Class uses on designated and non-designated sites

5.32 There are no existing uses for any type of employment on Pinkham Way

¹⁶Atkins Haringey Employment Land Final Study Feb 2015, para 5.41, page 25

5.32 (a) AltsMod 22 Paragraph 5.1.21 – extract below

Amend the paragraph to read as follows:

Manufacturing employment in Haringey continues to decline. Indeed, this decline is more pronounced in Haringey than in London or Great Britain. Haringey's Employment Land Study ~~2009~~ 2014 reflects this change in employment base by predicting a need for a total floorspace requirement of approximately ~~137,000~~ 23,800m² for the period 2006 – 2026. This includes a net reduction in demand for industrial and warehouse floorspace ~~as well as a modest net increase in logistics, warehousing and storage facilities~~. The majority of demand is predicted to be for B1 floorspace including light industrial. Much of this demand is to be met through the reconfiguration of redundant existing industrial and warehouse floorspace and through mixed-use development within LEA – Regeneration Areas and town centre sites, particularly ~~could be provided~~ in Wood Green Metropolitan Town Centre and the District Town Centres. The trajectory identifying the locations and phasing to deliver the additional employment floorspace needed is set out at Appendix 2b, and will assist in monitoring delivery over the plan period. Given the uncertainty around the long-term demand for employment floorspace, the Council undertakes to update the Employment Land Review every five years or within a shorter period should monitoring indicate a review is necessary. ~~This is supported in a working paper (39) produced by the GLA, which states that employment in all sectors is~~

- 5.33 We note that this modification clarifies further that B1 will form 'the majority of demand'
- 5.34 B1 floorspace is the category for which Atkins describes Pinkham Way as 'not an attractive location'
- 5.35 The Atkins Study concludes that B2 demand falls away under any scenario. For B8, they conclude that the North East of the Borough 'provides a good strategic location for accommodating new development ...'. Pinkham Way, in the extreme West of the borough, cannot provide any contribution to the North East.
- 5.36 In the response to SADPD Matters and Issues Matter 3 – Site Specific Issues – SA52, the Council stated that 'The Employment Land Review identifies that there is significant unmet need for employment land in the borough, and as such preserving this opportunity [retaining the employment designation] is considered appropriate. The site is proximate to the A406, and therefore a suitable location for new employment floorspace.'

- 5.37 Given the above, it is impossible to see the source of demand for any 'new employment floorspace' on Pinkham Way.
- 5.38 When considered with the very significant fall in forecast demand and in the light of our analysis above, the previous Inspector's assessment of the site 'as offering employment opportunities in the west of the borough' has now been superseded.
- 5.39 In any event, the Council's SA52 response above contradicts its own statement in response to LBH/Matter Inspector's Note 1: Location and Scale of growth. The Council's Employment/Retail Position Paper submitted to the hearings stated:

' As shown above, there is a healthy surplus of potential employment floor space that could be delivered in the borough, above and beyond what would be required to meet forecast need.....'

6 Emerging North London Waste Plan

- 6.1 The NLWP is in the early stages of development. It completed the Reg 18 consultations in September 2015.
- 6.2 NPPF PARA 216 requires decision makers to consider not only the stage of preparation an emerging plan has reached but also the weight of objections and the extent to which there are unresolved objections.
- 6.3 PWA, along with many others, has made representations objecting to many aspects of the emerging plan, not least that there is no up to date Waste Strategy in place in North London.
- 6.4 The Sustainability Appraisal for the NLWP produced by Urban Vision advised that the Pinkham Way site was unlikely to be considered PDL; that its development was likely to result in the loss of greenfield land and a potential part of the green infrastructure network; that covering the site or part of it in impermeable surfaces was likely to increase surface water run-off; and that, as

the site had a substantial number of trees, its development could have an impact on the local landscape and habitat.¹⁷

- 6.5 Natural England's response to the NLWP drew attention to the rare species noted in the PWA surveys and concluded:

"Although the site itself is not an International, European or Nationally designated site, it does provide a very good example of a brownfield site which over decades of being left to be reclaimed by nature has formed a rich biodiverse mix of habitats, which would be a loss to Haringey as well as more widely to London itself if developed".¹⁸

- 6.6 In light of the above, PWA would urge the Inspector to give little if any weight to the fact that the Pinkham Way site is included in the emerging draft NLWP.

7 Crossrail/TfL

- 7.1 The proposed Crossrail extension to New Southgate has recently been called into question by the Infrastructure Commission Report published in March 2016 which stated at **Recommendation 4:**

..... ". The most promising option identified to enhance affordability would be to delay the construction of the north western branch to New Southgate. This could reduce the costs of the initial scheme in the 2020s by around £4 billion. More work should also be done on the costs and benefits of individual central London stations. If construction of the north-western branch is delayed, this would also provide the opportunity to consider the case for an eastern branch from Hackney as an alternative"

- 7.2 The latest timescale for the completion of the Crossrail 2 New Southgate extension is early 2030s (after the plan period).
- 7.3 In the event that Crossrail 2 goes ahead with the New Southgate extension (including related TfL proposals), the planning designation on any site within a related masterplan for the area would be reviewed in the light of those

¹⁷ http://nlwp.net/downloads/consultation2015/17_Draft_Plan_Sustainability_Appraisal_Report.pdf, pp-209-212, Sections 2,5,6,7,8,10,12

¹⁸ http://nlwp.net/downloads/2016/Interim_Report_on_Draft_Plan_Consultation_Jan16_App_A-B.pdf p 183

strategic proposals. Crossrail is therefore not relevant to the decision about whether the employment designation on Pinkham Way is retained or removed.

8 **NLWA**

- 8.1 In its statement at the SADPD hearing, the NLWA stated that it had a statutory duty to manage the waste on behalf of seven North London boroughs. These boroughs have a statutory duty to provide their residual waste to NLWA. However, a number of North London boroughs have the power to manage their own non-residual waste and choose to do so.
- 8.2 Although the majority at present continue to rely on NLWA for recycling, Enfield have saved some £3m pa for some years by making their own recycling arrangements, and Camden have recently re-let their waste contract (starting April 2017 for 8 years with option to renew for further 8) and estimate that their new arrangements will save some £5m pa.
- 8.3 When PWA spoke to a senior Barnet councillor, he expressed a preference for Barnet to make its own arrangements but that for the moment it was locked into its present NLWA contract.
- 8.4 Although the NLWA have expressed their desire for the site to retain its employment designation, they came to the hearing without a shred of evidence to show that the site had reasonable prospects of development.
- 8.5 There was no comment from them about how the harm likely to occur from waste development on this important ecological site would be mitigated, and no information about how as site owner/occupiers they would achieve a viable development.
- 8.6 All they managed to produce was a statement to the effect that at some time in the future they were sure they would need the site for a waste facility of some type.

9 Summary

- 9.1 In accordance with the spatial strategy established in the Local Plan there is no sound basis for the retention of the designation of the Pinkham Way SINC for any form of employment use. It is not a priority within the Muswell Hill Area Neighbourhood.
- 9.2 The site does not meet the essential criteria for designation for Local Employment use and there are no evident reasonable prospects for its future development. Its retention therefore would be contrary to the provisions of the NPPF paragraph 22 and to the policies in the London Plan protecting biodiversity etc and contrary to the Council's own policies including SP7, SP8 and SP13.
- 9.3 The site is unsuitable for any form of major built development by virtue of its location, its poor accessibility by public transport, its lack of a direct access to the North Circular Road, its proximity to residential areas, and the significant constraints imposed by means of its value for open space, nature conservation and as part of an important green chain within this part of north London
- 9.4 In accordance with the Local Plan spatial strategy it is appropriate for the Council to give greater priority to those Local Plan policies which are concerned with the natural environment, and, in particular, with nature conservation and bio-diversity, open space protection and enhancement, and protecting and increasing the extent of trees and woodland within the Borough, and with its Air Quality Action Plan.
- 9.5 Dual designation of a SINC for employment or other development is unwarranted and is an anomaly in the Council's local plan. It inevitably provides for a lower level of protection for this SINC compared to all other SINC's within the borough, and there is no justification for such differential treatment of the Pinkham Way SINC.
- 9.6 In 2014 PWA submitted a five year site management plan to the council prepared by Denis Vickers (MCIEEM), previously Habitat Wildlife Manager for the London Wildlife Trust. The plan sets out a long-term scheme of positive management for the site, and some 130 local residents signed up to commit practical help in its implementation. Mr Vickers agreed that he would be willing to oversee the management plan. This demonstrates the concern and commitment of the local community about the future of the site and its protection.

From: Ball Gavin [mailto:Gavin.Ball@haringey.gov.uk]
Sent: 26 May 2015 11:00
To: eiblin1@btinternet.com
Cc: Goldberg Neil
Subject: FW: Local Plan evidence

Evelyn

There was no analysis of a 100% commercial scheme as this returned a negative residual value under any scenario.

All of these indicate that an element of a high value use (such as residential) would be required in order to bring forward a viable scheme containing employment, and safeguarding of land for a SINC. As set out in the allocation, further, more detailed analysis will still be required on both the ecological significance of the site and development viability as part of any future development proposal for the site.

Regards

Gavin

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LUC - LBH Open space and Biodiversity Study 2014, Initial SINC assessments (Pinkham Way site is shown as site No 87, first line)

"Large brownfield site with no public access. This site is unique in the borough due to its size and the habitat mosaic it supports."

A	B	C	D	E	F
Site Name	Site Number	Owner or Manager	Current designation	Current Status	Comments
Former friern Barnet Sewage Works	B7	North London Waste Authority & LB Barnet	Borough Grade II	No Change	Large brownfield site with no public access. This site is unique in the borough due to its size and the habitat mosaic it supports.
Lee Valley	B1	LB Haringey	Metropolitan	No Change	Small part of the Wider Lea Valley SINC.
Parkland Walk LNR	B15	TFL	Metropolitan	No Change	No change although the boundary issue does pose a threat.
Highgate Wood	B15		Metropolitan	No Change	Very high quality woodland
Queen's Wood LNR	B15		Metropolitan	No Change	Very high quality woodland
					This site has undergone dramatic enhancements in recent years.
Lordship Lane Rec & Allotment Gardens	B5	LB Haringey	Local	Potential Upgrade	The habitat mosaic it now supports is certainly worthy of Borough Grade 1 listing. Boundary of the SI should be expanded to include entire park.
St Ann's Hospital Grounds	B3	NHS	Local	No Change	Small area of woodland
Land adjacent to Fortismere School	B6	Eden Primary	Local	At Risk	Significant proportion of this site has been redeveloped to accommodate Eden Primary School.
					Limited public access to some and mostly no public access. The area with no public access has experienced a high level of disturbance in the recent past in is now dominated by relatively young scrub and woodland.
Bruce Grove Wood	B14	LB Haringey	Local	At Risk	Site could be significantly enhanced
Rear of 3 Fairfield Rd	B16	?	Local	At Risk	Not obvious why this site is designated. Essentially it is a large private garden.
Tunnel Gardens	B12	LB Haringey	Borough Grade II	No Change	Linear strip of scrub and woodland
Highgate Golf Course	B8		Borough Grade II	Potential Upgrade	Large open space with significant number of large, mature trees, small areas of woodland and rough grassland. The age of the trees is sufficient that this site could be a borough grade 1 site.
Tottenham Railsides	B9	Network Rail	Borough Grade II	No Change	No access, no obvious change
Markfield Recreation Ground	B10	LB Haringey	Borough Grade II	No Change	Small areas of woodland, scrub and rough grassland.
Shepherds Hill Gardens	B13	LB Haringey	Local	No Change	Small area of woodland
Golf Course Allotment	B18	LB Haringey	None	Potential Upgrade	Large open green space, potentially a Local grade SINC
Tottenham Hale to Northumberland Park Railside	B11	Network Rail	Borough Grade II	No Change	No access, no obvious change
Southwood Lane Wood	B7	LB Haringey	Local	No Change	Very small linear area of woodland. Not obviously of SINC value

Comments of Haringey Council's Nature Conservation Officer

See Sites in the West of the Borough section below

From: <mailto:FoHPForum@yahoogroups.com>

Sent: Wednesday, April 22, 2015 6:03 PM

To: fohpforum@yahoogroups.com

Subject: [FoHPForum] Parks Service responses to Council's planning sites proposals

Forwarded for your information [see below]

These were prepared by Ian Holt last October.

I happy to share these with the forum as the position of the parks service.

Kind regards

Simon

Simon Farrow

Parks & Leisure Services Manager

Haringey Council

Haringey's Site Allocations DPD Reg 18 Consultation Document Nature Conservation Officer Comments – Oct 2014

Infrastructure p9

The delivery plan should look to establish a coherent ecological network resilient to current and future change as identified in NPPF.

Introduction to Green Grid p 14

What is a Green Grid? – The text following this heading does not explain what a Green Grid is.

Why a Green Grid is Important – No mention of flood risk, climate change, ecology, etc, etc?

What are the benefits of a Green Grid? – Again no mention of flood risk reduction, adaptation to climate change, Government targets on biodiversity, etc, etc.

How will the Green Grid be improved? – Refers to a map showing the Green Grid proposed in Haringey but I am unaware of any consultation regarding ecology, climate change, etc, which are key functions of any Green Grid as highlighted in the All London Green Grid SPG.

The Green Grid section focuses on a very limited set of Green Grid functions and as such fails to deliver on many of the other necessary components.

SA 3 – Clarendon Square

Future Planning Requirements should take into account the blue ribbon network which crosses the site and the need to deculvert and restore the River Moselle where possible. The site is also adjacent to an ecological

corridor which should be enhanced to form part of a coherent ecological network.

SA 4 – St Ann’s Hospital

St Ann’s is adjacent to 2 SINC’s and an ecological corridor. The site also includes a SINC. Any development should look to protect and enhance biodiversity on site and increase connectivity.

SA 5 – St. Luke’s Hospital

Adjacent to a SINC and close to 2 SMI’s and an LNR. Future development plans should look to enhance connectivity and prevent any negative impact upon the SINC’s.

Wood Green, Turnpike Lane, & Haringey Heartlands p 30

There is a need to recognise the Blue Ribbon Network within any proposals. SuDS should be incorporated to reduce pollution to the River Moselle. Green Roofs should be incorporated in new developments.

SA 14: Wood Green Library

Good to see the possibility of deculverting the Moselle. If not deculverted here it should be deculverted elsewhere as a condition.

SA 20: North of Hornsey Rail Depot

Proposals fail to recognise the site as part of an ecological corridor directly adjacent to a Site of Metropolitan Importance for Nature Conservation. No development should take place without determining the ecological impact which should be to enhance the ecological connectivity and biodiversity value. Tall buildings and increased human activity within close proximity to the river are likely to cause disturbance which could adversely affect European Protected Species and other wildlife.

This proposal should be replaced with a more generic statement on potential development subject to agreed enhancement to ecological connectivity and biodiversity value.

Haringey Heartlands

SA 24: Clarendon Square Gateway

Support proposals to deculvert the Moselle. If not possible the route should be left open for future opportunity and recognised on the ground through habitat creation and public access.

SA 25: Clarendon Road South

This site is adjacent to ecological corridor which should be enhanced as part of any proposals. Ideally it should be widened and managed as part of landscape proposals. The tallest buildings should be furthest from the corridor in order to minimise disturbance.

SA 26: NW of Clarendon Square

Tall buildings close to ecological corridor could cause disturbance and should ideally be reduced in height, especially if they will over look the reservoir SINC.

SA 27: L/a Coronation Sidings

A tall building in this area would seem particularly insensitive to both the ecological corridor upon which it would stand and the New River SMI, Wood Green Reservoirs SINC, and Alexandra Park SINC and statutory LNR. The proposals make assumptions as to the possibility of improving the function of the ecological

corridor whilst imposing a 12 storey building upon it. There is no evidence that this will be possible. As an ecological corridor the emphasis should be on how to enhance its ecological connectivity and function as stated in NPPF and then see what size building if any could be suitable not the other way around.

Sites in the South of the Borough

SA 28: Wightman Rd

The report states: "While accepting that the quantum of the ecological corridor in this area will be reduced, the function of the corridor should be enhanced through the development."

This makes assumptions which cannot be guaranteed. The size of an ecological corridor is an important factor in what species will or will not use it, as is a lack of disturbance and the level of light pollution. In order to deliver a coherent ecological network as required by the NPPF we should be looking to increase the quantum of the ecological corridor not reduce it.

SA 29: Arena Retail Park

Support the guideline on a positive contribution to the ecological corridor. Note that the railway line is also a SINC. There should be a buffer zone here and an extension in the width of the corridor. This is of particular importance due to the loss of habitat forthcoming with new electrification project.

Harringay Warehouse District - SA 31 – 37

All site proposals should look to enhance the adjacent SINC and ecological corridors in the area. Ideally this would include new links south to the New River SMI. Incorporation of green roofs and SUDs.

SA 38: Finsbury Park Bowling Alley

This site includes a Site of Metropolitan Importance for Nature Conservation and is directly adjacent to a Borough Grade SINC and ecological corridor. European Protected Species could also be adversely affected. The park is currently a largely dark site in a well lit area and the proposal of new high rise buildings overlooking it are likely to effect the SINC and their ecology. Taller buildings should be located on the road not the SINC boundary.

Any development here needs to enhance the ecology in line with NPPF.

SA 39: 18 – 20 Stroud Green Rd

Directly adjacent to an ecological corridor. Tallest storeys should not be adjacent to the ecological corridor and any development upon this site should enhance the ecological corridor. Green roofs may go some way to achieving this but landscaping close beside the corridor should also be considered.

Highgate Neighbourhood Area

SA 40: 460 – 470 Archway Rd

Opening up of the tunnels to link with the Parkland Walk should not be considered. These tunnels are important in a regional context as no other large hibernation site is known within a 20km radius. It also has the largest number of hibernating Natterer's and Daubenton's bats recorded in Greater London.

SA 41: Former Highgate Rail Station & Gonnerman Antiques Site

This site is not only an ecological corridor but also a Site of Metropolitan Importance for Nature

Conservation and Metropolitan Open Land. As such and given its high importance for European Protected Species the proposed development is inappropriate.

The LDF states that the Council will not permit development unless there are exceptional circumstances & where the importance of the development outweighs the nature conservation value of the site. This cannot be demonstrated for this proposal.

Opening up of the tunnels to link with the Parkland Walk should not be considered. These tunnels are important in a regional context as no other large hibernation site is known within a 20km radius. It also has the largest number of hibernating Natterer's and Daubenton's bats recorded in Greater London. It should also be noted that alternative routes exist for both pedestrians and cyclists.

SA 42: Highgate School

Although not designated as SINC the school grounds have been identified as being of ecological value. Biodiversity enhancement and ecological linkage should be included within the guidelines.

SA 44: Summersby Road

Site Requirements & Development Guidelines - "The impact of the development on the Queen's Wood should be minimised."

There should be no impact upon Queen's Wood LNR unless it is ecological enhancement.

Higher buildings should be in the centre of the site furthest from the SMI, LNR. It is important that there is no additional light spill onto the site which is habitat for European Protected Species of bat.

SA 45: Hillcrest

Site Requirements – "A new exit from the site onto Southwood Lane should be created." Further information is needed on whether this is pedestrian or vehicular and what impact this would have upon the SINC. I suggest that 'should' should be replaced with 'could' given further exploration of its ecological impact.

Development Guidelines – It is likely that the proposals could have an adverse impact upon the SINC therefore mitigation/compensation will be necessary to improve the overall biodiversity value of the estate.

Sites in the West of the Borough

SA 46: Hornsey Water Treatment Works

This site is located close to a LNR, Borough and Metropolitan SINC's, an ecological corridor, and the Blue Ribbon Network. As such this is a sensitive area and a high standard of biodiversity enhancement should be incorporated into any designs e.g. green roofs and open water SuD's schemes.

SA 47: Pinkham Way - Site Requirements

Proposed Site Allocation/Site Requirements

There should be no residential development upon this site. It has not previously been identified as a site for residential development and no outstanding or exceptional circumstances exist for housing to be built on a SINC of this importance. If employment uses are not economical for this site then it should remain undeveloped for its ecological importance and the employment designation removed.

No mention is made of the sites MOL status or the culverted stream.

Mitigation & or compensation for any loss of habitat should be agreed and ideally be in place prior to any development. If adequate mitigation/compensation cannot be agreed then the development should not take place.

Development Guidelines

The golf course to the south of the site and Hollickwood Park are both SINC's and the ecology of these sites should not be adversely affected.

Any development needs to protect and enhance the sites biodiversity value through mitigation and/or compensation.

Deculverting of the stream should be a condition of development.

"There may be potential to relocate some businesses from Regeneration Areas in other parts of the borough to improved premises at this location." This is not acceptable as if existing or alternative sites exist for development then a SINC should not be developed.

SA 48: Cranwood & St. James' School

Any development should also take into account the MOL, SMI, SINC & LNR status of adjacent and nearby land. As such any new development should look to enhance biodiversity and incorporate features such as green roofs into their design as highlighted in the LDF.

SA 49: Park Grove & Durnsford Rd

The ecological corridor should be extended through the site to Springfield Community Park.

SA 49 (?): Tunnel Gardens

Close proximity to Scout Park the only Great Crested Newt (GCN) site identified within the borough. Adjacent to Tunnel Gardens SINC and close to 4 other SINC's.

Development here should include the creation of a GCN pond and habitat to help maintain and protect the species in line with the Council's Biodiversity Duty.

SA 50: Alexandra Palace

SINC & LNR status should be noted. Biodiversity value of the park should be retained and enhanced where possible.

SA 51: Barber Wilson

Support deculverting of Moselle.

SA 52: Broad Water Farm

The proposals would seem to include the development of part of Lordship Rec which has recently been the recipient of a multi-million pound regeneration project. It is likely that any proposals to develop this land will result in a claim for the return of external funding for the project and face high levels of organised local

opposition.

The site is a district park designated as MOL. It has also been identified as a future borough SINC capable of removing an area of deficiency in access to natural green space.

Any development of the estate should include further deculverting of the River Moselle include green roofs and open water SuDS schemes.

SA 54: Leabank

Any development should be set back from the SMI & SINC increasing the buffer zone and enhancing biodiversity. Lighting will be a key issue as will the close proximity to RAMSAR/SPA. Possibility of the development helping to deliver improved green infrastructure including the proposed bridge linking Markfield Park to Walthamstow Reservoirs.