

**Haringey Council Core Strategy Examination
Hearing Session 8, 22nd February 2012**

2b Employment Land. DEA6 Pinkham Way. (viii –xxii).

viii. What is the current situation with regard to the site and the North London Waste Plan?

- a. The North London Waste Plan (NLWP) has not yet been submitted to the Secretary of State.
- b. Following the pre-submission consultation, the NLWP has undergone review in light of the consultation responses received. The submission draft has been agreed by the seven boroughs with some minor amendments – which simply clarify the Plans policy intent, correct typographical errors, improve referencing or update supporting evidence.
- c. The NLWP maintains its proposal for putting forward Pinkham Way (DEA6) as a potential waste management site.
- d. It is intended for the NLWP to be submitted on the 28th February 2012. If the plan assessment follows timescales suggested by PINS, with a pre-hearing meeting, the likely programme would then be:

2012

Submission target date	28 th February 2012
Pre-hearing meeting	May 2012
Examination in Public	June 2012
Report	October 2012
Adoption	January 2013

- ix. Is the proposed designation intended to facilitate the provision of a waste plant upon the site rather than as part of a general and evidenced strategy of land allocation?**
- a. The proposed change to DEA6 is not intended to facilitate the provision of a waste plant upon the site. The existing designation of DEA6 as an Employment Location being changed to LSIS has no material effect on an application for a waste management site as both designations include B1, B2 and B8 use classes.
 - b. The proposed designation has been considered as part of an evidenced strategy of land allocation. The continued protection of this site is supported by Haringey's Employment Study (2008). In order to plan for economic development over the life of the Core Strategy and to meet the increased floorspace of 13,700m², it is necessary that economic restructuring and reconfiguration of existing DEAs is carried out to make the sites fit for modern practice.
 - c. This approach reflects PPS4 and PPS12; the Council has undertaken a planned approach to land allocation.
 - d. The evidence to support the continued designation of the Former Friern Barnet Sewage Works Site is within the 2008 Employment Study. (LBH – 14). The findings of the Study clearly state that all designated defined employment areas should be protected and encourages the intensification and improvement of existing employment areas. (Haringey Employment Study - 2008 Update. 2009. Atkins. LBH – 14. Conclusions and Recommendations, pp77-81).
 - e. The change in designation is to safeguard the site's allocation for B1, B2 and B8 use. The reference to B class uses does no more than confirm the Council's view for the need to increase the protection to be afforded to this site, discourage town centre type uses that would be otherwise permitted under an Employment Location designation.

- x. **What is the rationale for the change? What practical effect does the reclassification have? What prompted the alteration following the pre-submission draft Core Strategy?**
- a. Following the proposed submission Core Strategy consultation in May/June 2010, the Council considered it was important to provide further clarification on its employment designations to provide a positive strategic policy for safeguarding employment land, in order to meet our future requirements and to provide locally based employment across the borough up to 2026.
- b. Therefore, an initial review was carried out which assessed all of the borough's defined employment areas and identified some DEAs that would benefit from having their designations changed to adapt to the changing environment around them, as well as to acknowledge the uses already there. The review also identified sites that require stronger protection to ensure there are sufficient sites to accommodate B uses. These proposed changes were consulted upon in November/December 2010, alongside the changes to SP2 Housing.
- c. The evidence to support the continued designation of the Former Friern Barnet Sewage Works Site is within the Employment Study Update (2008). The findings of the Study clearly state that all designated defined employment areas should be protected which strongly encourage the intensification and improvement of existing employment areas. Therefore, taking into account the exacerbated economic downturn, the Council will continue to protect Council employment land.
- d. The practical effect of the reclassification of DEA6 from an employment designation which includes A, B and D use classes to Locally Significant Industrial Sites, which identifies sites most appropriate for B use class, was specifically to promote land use other than retail, community, leisure and creative and cultural industries that would undermine the boroughs town centres within the borough.
- e. The reference to B class uses does no more than confirm the Council's views for the need to increase the protection to be afforded to this site, that will discourage town centre type of uses, and affording stronger protection to the site for use as B use classes.
- f. The Employment Study Update (2008) recommended that the Council considered the criteria guide by the Mayors Industrial Capacity SPG to identify Locally Significant Employment Locations. It stated that Haringey employment land available is fit for purpose and should be retained for employment use. This reflects the recommendation of the Employment Study Update (2008) for the identified need for more B1 and B8 floorspace.

- xi. If retail uses are to be mitigated, could alternative wording be employed? What level of risk is there in relation to an over expansion of retail uses?**
- a. In the past there has been some interest from retail companies in the site. The site is close to out of town centre retail uses on the other side of the North Circular in Enfield and Barnet. Enfield recently adopted a masterplan for New Southgate for mixed use development. As a result, the Council is of the view that a LSIS designation will provide stronger protection for the long term future of the site for employment use and having regard to the pressures identified above and previous interest in the site, will deter approaches for uses such as large retail use which is suitable for town centres.
 - b. When the site was marketed by the London Borough of Barnet in 2008, four offers were received that included retail use, despite the designation for B1, B2 and B8 uses. Such offers confirm the high level of interest in retail development in the area.
 - c. The reference to B class uses does no more than confirm the Council's views for the need to increase the protection to be afforded to this site, which will discourage town centre type of uses.

- xii. **Is the proposed change justified on the basis of LSIS criteria?**
- a. The Council considers that the proposed change to DEA6 is justified on the basis of LSIS criteria as set out in paragraphs 4.11 – 4.13 of the Mayor’s SPG on Industrial Capacity. The Council’s approach to designating all LSIS in the borough is to retain those sites in industrial use that are functionally the most important for industrial users. These generally include the better quality industrial sites, but also include poorer quality sites that provide scope for low cost industrial accommodation for which there is demand.
- b. DEA6 represents one of only a few good quality undeveloped employment sites in the borough. Safeguarding this land for core employment uses is essential in making a contribution to the future prosperity of Haringey.
- c. The SPG states that when boroughs designate LSIS they need to take into account the following: Economic, Land Use and Demand based criteria. The criteria are based on general economic and land use factors and indicators of industrial demand.
- d. Key LSIS criteria against which the site was assessed include:
- Economic criteria:
 - meets strategic, long term demand;
 - potentially meets demand for waste management, recycling, transport and utilities;
 - is well located to take advantage of existing infrastructure (including strategic road and public transport);
 - offers potential for the provision of small industrial units serving local residential areas;
 - potentially provides lower cost industrial accommodation.
 - Land Use criteria:
 - well located in relation to the strategic highway network;
 - reasonably well located in relation to the rail network;
 - is adjacent to an existing, protected and viable industrial and commercial area;
 - offers potential for waste management or recycling;
 - provides sufficient space for adequate operational parking and turning space for goods vehicles.
 - Demand criteria:
 - evidence of marketing is not clear. Re-designation as a LSIS intends not only to protect the site for core employment uses but to give the market greater certainty

regarding the most appropriate form of development on the site.

- e. Haringey is classed as a 'limited transfer' in terms of industrial land release. This means that taking account of local variations of demand Haringey is encouraged to manage and where possible, reconfigure its portfolio of industrial land, safeguarding the best quality sites and phasing release to reduce vacancy rates for land and premises towards the frictional rates of about 5% of the industrial land stock and 8% for floorspace. A vacancy rate of 8% is reported in Haringey's Employment Study (2008) which is a frictional rate of vacancy that reflects a reasonably healthy market where demand and supply are largely in balance.
- f. Therefore, the Council considers that based on the Mayor's LSIS criteria and the findings of the Employment Study 2008 there is support for the LSIS designation on DEA6.

- xiii What evidence informs the nature conservation value of the site?
Is this evidence adequate?**
- a. In 2003 the Greater London Authority's Biodiversity Strategy Team, working with Haringey Council officers, consulted on a draft document of sites to be protected as Sites of Importance for Nature Conservation in Haringey (SINCS). The list of sites was based on a survey commissioned by the Greater London Authority in 2002 and updated the list of sites identified in the former London Ecology Unit's report Sites of Importance for Nature Conservation in Haringey of 1990 and previously revised for the adopted Unitary Development Plan of 1998.
 - b. The Former Friern Barnet Sewage Works was first identified as a site for nature conservation in 1990, and the boundaries of the site were changed in November 2002, while the citations for the site were changed in 2003. The site is listed as of Grade 1 importance and the description is "typically diverse wasteland site, with a high botanical diversity. Several uncommon plants include bee orchid (*Ophrys apifera*). The nationally scarce golden dock (*Rumex maritimus*) has been recorded here in the recent past. There are also good lists of birds and invertebrates. The site is zoned for industrial development; redevelopment will take nature conservation into account. Some changes have been made to the site in the current UDP".
 - c. In 2008 a survey of the FBSW was carried out by Jacobs UK Ltd based upon the standard methodology developed by the Joint Nature Conservation Committee (JNCC1990) and involved searches for the signs of species of particular nature conservation importance (and a note of features present of potential value to those groups). Habitats were mapped and described according to vegetation community types and dominant plant species present.
 - d. In preparation for the Core Strategy the Council's list of Sites of Importance for Nature Conservation was not updated. As part of Matter 8 at the Core Strategy Hearing in June 2011, the Council acknowledged (Issue 8.5) that they would need to revisit sites already identified in the GLA's assessment dating from 2003 to assess whether the value of the sites had changed in any way. The GLA has produced a draft note on the process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London. This advice note states that relevant land should be surveyed every "5-10 years". The site is therefore coming towards the end of the period during which it should be surveyed again. At present the site is of Borough Grade I Importance.

xiv Is the site adequately assessed in terms of its open space value?

- a. In 2003 Atkins Consultants carried out a study of the open space in the borough. Friern Barnet Sewage Works (FBSW) is a brown field site that has a dual designation as a site of importance for nature conservation (SINC). Its brown field status is as a result of the site being used as a sewage works between (circa) 1891 and the 1960s. The site is located to the south of Pinkham Way, which forms part of the North Circular Road (A406). The East Coast Mainline railway line, which runs into and out of Kings Cross Station, forms the eastern boundary of the site. To the south of the site lies the Muswell Hill Golf Club and to the west of the site lies Hollickwood Park and beyond an area of residential development around Alexandra Road.
- b. At the time of the Open Space study there was no known or identified accessibility for the public onto Friern Barnet Sewage Works for recreational purposes. The site, while immediately abutting with Hollickwood Park, was and remains cordoned off to the public. Because the site was not publicly accessible, it was not counted when determining open space provision in the local area. Figure 4.4 of the Atkins Open Space Study 2003 shows those areas of the borough that are deficient in open space. The map does **not** show FBSW as an area of public open space. Further, the area around FBSW is **not** an area that is considered to be deficient in public open space.
- c. Its open space value in terms of its ecological value was acknowledged by the GLA's draft assessment of Sites of Importance for Nature Conservation produced in June 2003.
- d. On the basis of the private ownership of the site and its inaccessibility to members of the public to use for recreational purposes, as well as noting that the wider area is not deficient in public open space, then, yes, the site has been adequately assessed in terms of its open space value.

xv. Is the site part of a designated green corridor?

- a. A small portion of the north-east corner of the site forms part of a designated ecological corridor. This can clearly be seen on the UDP map dated 2006 in the middle of the eastern side of grid reference E4. the portion of the site that is a designated ecological corridor forms part of the embankment of a railway line. That part of the site that forms part of the ecological corridor comprises 2544 msq.

- xvi. **Does the change in designation reflect adequately national planning policy for example PPS1, 4, 9?**
- a. It is considered that the designation reflects adequately national planning policy as set out below:
- b. **PPS1: Delivering Sustainable Development, 2005.** PPS1 places Sustainable Development at the heart of planning. Sustainable development recognises the need to balance social, economic and environmental needs. Para 5 of PPS1 sets out clearly what this means for planning.
- c. SP8 achieves such a balance through the use of the dual designation by protecting the land for both economic and environmental purposes, which in turn should provide added social benefits through employment and an improved environment. In planning for sustainable development, para.19 goes on to say:
“Where adverse impacts are unavoidable, planning authorities and developers should consider possible mitigation measures. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.”
- d. The above approach has been followed both in the development of the policy and in carrying out the SA. Where likely adverse impacts have been found, suitable mitigation measures have been identified in accordance with the above guidance.
- e. Furthermore in para. 23, the guidance states the requirements for Sustainable Economic Development that planning authorities should follow. SP8 accords with this guidance by protecting employment land in order to enable economic growth, whilst recognising the importance of the nature conservation value of the site. The policy also provides for flexibility and reflects the need to provide a plan that can respond to a rapidly changing market.
- f. The approach to the dual designation is further supported by paras. 24, 27-29 regarding the preparation of development plans. Of particular relevance to SP8 is the need to:
- Bring forward sufficient land of a suitable quality in appropriate locations to meet expected needs
 - To actively seek to bring vacant and underused previously developed land back into beneficial use
 - To enhance as well as protect biodiversity, natural habitats and landscape character
 - To demonstrate how their plans integrate various elements of sustainable development, which enable social, environmental and economic objectives to be achieved together

- Adverse social, economic and environmental impacts should be avoided, mitigated or compensated for.

The approach taken in SP8 has fully incorporated the above requirements.

- g. PPS1 also offers guidance on spatial planning as set out in para. 30. In developing the policy, attention has been given to adjacent land functions and the need to create integrated policies.
- h. **PPS4: Planning for Sustainable Economic Growth, 2009.** PPS4 sets out the Government's comprehensive policy framework for planning for sustainable economic development in urban and rural areas. Economic development is defined as development within the B Use Classes, public and community uses and main town centre uses.
- i. The Government's overarching objective is sustainable economic growth, which is defined as:
'Growth that can be sustained and is within environmental limits, but also enhances environmental and social welfare and avoids greater extremes in future economic cycles.' (PPS4, page 3).
- j. PPS4 puts an emphasis on using evidence to plan positively, including being informed by regional assessments. Details of how the evidence base and the guidance in PPS4 informed the Core Strategy are set out in Factual Statement 3: PPS4 Compliance (FS-3).
- k. Section Policy EC2.1 of the guidance with reference to development plans, includes the following sections of particular relevance in relation to SP8.
d) seeks to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use and, subject to the specific policy requirements of this PPS for town centres, reflects the different location requirements of businesses, such as the size of site required, site quality, access and proximity to markets, as well as the locally available workforce.
- l. The above factors were all taken into consideration with regard to Friern Barnet (a suitable brownfield site of appropriate size, quality, access and proximity to markets) and were assessed in the Employment Land Study 2009, which recommended that all existing employment sites be retained. The review of the employment designations carried out in August 2011 added further support to the need to safeguard existing employment clusters for business and industrial use, given the limited amount of readily available supply to future demand. The study concluded that the designation would ensure a positive and proactive approach to economic development, providing choice and flexibility over the life of the Core strategy in line with policy.

- k. *h) at the local level, where necessary to safeguard land from other uses, identifies a range of sites, to facilitate a broad range of economic development, including mixed use. Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered.*
- l. The employment land studies have demonstrated the need to retain the site as an employment designation and to strengthen the allocation by classifying it as a Locally Significant Industrial Site, whilst limiting retail uses to more appropriate town centres and Local Employment Areas. In order to ensure the Council's evidence base is as up to date and to inform future LDF documents, the Council has commissioned a 2012 update of Haringey's Employment Study 2008.
- m. **PPS 9: Biodiversity and Geological Conservation, 2005.** PPS9 sets out the Government's national policies on the protection of biodiversity and geological conservation through the planning system. The Government's objectives for biodiversity include:
- *To promote sustainable development*
 - *To conserve, enhance and restore the diversity of England's wildlife and geology*
 - *To contribute to rural 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.*
- n. The dual designation reflects the need to encourage sustainable development, through the provision for employment land and protection of biodiversity afforded by the SINC. Policy SP8 is further supported by Policy SP13: Open Space and Biodiversity, which seeks to ensure that development 'will protect and improve sites of biodiversity and nature conservation.' At the last hearing of the EiP the following amendment was also agreed to policy SP13.

Amend 7th sentence (para. 6.3.23) to read as follows: "The Council will not permit development on SINC's and LNRs unless the importance of the development outweighs the nature conservation value of the site and appropriate mitigation measures are provided. *In these cases, and where a site has a*

dual designation, appropriate mitigation measures must be carried out."

- o. The above alteration reflects the guidance on mitigation measures set out in section 1(vi) of the guidance.
- p. PPS9 is also very clear on the use of previously developed land, as set out at para. 13:
'The re-use of previously developed land for new development makes a major contribution to sustainable development by reducing the amount of countryside and undeveloped land that needs to be used. However, where such sites have significant biodiversity or geological interest of recognised local importance, local planning authorities, together with developers, should aim to retain this interest or incorporate it into any development of the site.'
- q. The dual designation reflects the contribution that brownfield land can have towards the economic growth of the Borough, whilst offering the necessary protection to the biodiversity value of the site.

- xvii. **Should the CS include specific recognition of the site's nature conservation value, for example 'subject to no adverse effect on the nature conservation value of the site'? Is the designation consistent with the Council's Community Strategy and Biodiversity Action Plan?**
- a. At the last hearing of the EiP the following amendment was agreed to policy SP13 Open Space and Biodiversity. Amend 7th sentence (para.6.3.23) to read as follows:
"The Council will not permit development on SINC's and LNR's unless the importance of the development outweighs the nature conservation value of the site and appropriate mitigation measures are provided. *In these cases, and where a site has a dual designation, appropriate mitigation measures must be carried out.*"
- b. The policies within the Core Strategy are strategic in nature and do not deal with site specifics. Any site specific information should be addressed in the Site Allocations DPD or any planning applications. No further amendment is considered necessary.
- c. **Community Strategy.** The Core Strategy has been drawn up with full consideration of the Community strategy and its priorities:
- **People at the Heart of Change** by delivering new homes and new jobs, with supporting services and transport and utility infrastructure at the right place and the right time.
 - **An Environmentally Sustainable Future** by responding to climate change and managing our environmental resources more effectively to make Haringey one of London's greenest boroughs.
 - **Economic Vitality and Prosperity Shared by All** by meeting business needs and providing local employment opportunities and promoting a vibrant economy and independent living.
 - **Safer for All** by reducing both crime and fear of crime, through good design and improvements to the public realm and by creating safer, cleaner streets.
 - **Healthier People with a Better Quality of Life** by providing better housing, meeting health and community needs and encouraging lifetime well-being at home, work, play and learning.
 - **People and customer focused** by providing high quality, accessible services that give value for money, respond to people's need and meet their aspirations. Put greater emphasis on community engagement and tackle social exclusion.
- d. The dual designation reflects the priorities of the Community Strategy to create economic vitality whilst protecting the environmental resources of the area.

Biodiversity Action Plan, 2009. The designation also supports the Biodiversity Action Plan by continuing to offer protection to nature conservation through the Site of Importance for Nature Conservation status. Should development come forward in the future then suitable mitigation measures will need to ensure that an overall net balance of biodiversity for the borough is maintained. The dual designation may also assist in the promotion of active management for the SINC in the future as the site is currently un-managed and has been for several years.

xviii. Is the site allocation consistent with the London Plan; for example Section 7, Policies 4.4, 3D.14?

- a. The GLA has confirmed to the Council that the Core Strategy, including all site allocations, is in general conformity with the London Plan. Section 7 Policy 7.18 of the London Plan is concerned with Protecting Local Open Space and Addressing Local Deficiency. The policy sets out that the Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency. The Atkins Study did not conclude that the area around FBSW was an area that was deficient in open space. In coming to this conclusion the open space provided within FBSW was not included. The dual designation of the site (as an employment site and as a SINC) offers protection to the site and mitigation in any circumstances where the nature conservation value of the site is compromised.
- b. Policy 4.4 of the London Plan is concerned with Managing Industrial Land and Premises. FFBSW is designated as a Locally Significant Industrial Site (LSIS) in the Core Strategy. FFBSW is a brown field site and has had an employment designation dating back to at least 1891. The land was designated as Employment Land (DEA6) in the 2006 UDP. The aim is to retain the site for uses that fall within B1, B2 and B8 uses. In line with the Employment Study (2008) the Council will protect all LSIS to provide choice and flexibility in employment land.
- c. The retention of an employment designation on this brownfield site, previously used for industrial purposes, is compatible with Policy 4.4 of the London Plan which seeks to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses.
- d. Policy 3D.14 is not a policy in the 2011 London Plan. It was a policy in the former London Plan which has now been replaced by The London Plan 2011

xix. Is the site deliverable in light of its nature conservation value?

- a. The site is identified in the GLA study 'Sites of Importance for Nature Conservation, 2003' as a SINC of Grade 1 importance. The site is described as:

'A typically diverse wasteland site, with a high botanical diversity. Several uncommon plants include bee orchid (Ophrys apifera). The nationally scarce golden dock (Rumex maritimus) has been recorded here in the recent past. There are also good lists of birds and invertebrates. The site is zoned for industrial development; redevelopment will take nature conservation into account. Some changes have been made to the site in the current UDP.'

- b. The Council recognises that a review of the SINC's will be necessary in the next year or two to ensure the quality and quantity of nature on the sites has not changed. The site is also included in Table 36 of the Biodiversity Action Plan as a SINC.
- c. The Core Strategy proposes a dual designation for the site as a Locally Significant Industrial Site and a Site of Importance for Nature Conservation. Policy SP13 Open Space and Biodiversity states that 'where a dual designation exists appropriate mitigation must be carried out.'
- d. More recently further reports were commissioned by the London Borough of Barnet to assess the development constraints for the Friern Barnet Site at Pinkham Way. The assessments were prepared by consultancy Jacobs and included the following reports:
- Development Constraints Report, April 2008
 - Habitat Suitability Index, April 2009
 - Badger Survey Report, May 2009
 - Reptile Survey, June 2009
 - Great Crested Newt Surveys, June 2009
- e. As part of the assessment of development constraints a desk study and extended Phase 1 Habitat survey were carried out to identify ecological constraints affecting the site. As a result of the assessment further more detailed assessments were carried out to assess if there were badgers, reptiles or great crested newts present.
- f. The badger survey did not identify any badger activity during the survey, however, it is possible that they may use the site for occasional foraging or move on to the site at a later date. The report therefore recommended that the site be re-checked for badger activity if more than a year from the date of the survey.
- g. The results of the reptile survey indicate that reptiles are likely to be absent on the site and do not need to be considered until two years

has lapsed. The report recommended that the reptile survey would therefore need to be repeated.

- h. The great crested newt survey also did not observe any species during any of the site visits that were undertaken. The report therefore concludes that it is extremely unlikely that Great Crested Newts will be present. The survey should be repeated if two years has lapsed in accordance with good practice. The report recommended that the survey will therefore need to be repeated.
- i. The surveys have therefore shown that the nature conservation value of the site does not provide a constraint that would affect the deliverability of the site. The report recommended that further surveys would be required prior to any development to ensure that the situation had not changed. Policy SP13 Open Space and Biodiversity will ensure that mitigation measures must be carried out to ensure that there is no net loss of biodiversity within the Borough.
- j. The marketing of the site carried out by the London Borough of Barnet in July 2008 also shows that there was significant demand for the site, despite the context of the uncertain market conditions, with a total of ten bids received to purchase the land. The planning statement made available to prospective purchasers supported Employment use on the site (B1, B2 and B8 uses) subject to no adverse effect on the nature conservation of the site. Whilst other uses such as retail warehousing and mixed uses were also indicated as possible uses on the site subject to planning, the site still attracted interest from two purchasers interested in B1, B2 and B8 uses. Such interest in the site shows that prospective purchasers do not consider the nature conservation value as a potential constraint to deliverability.
- k. The GLA has also not raised any concerns with regard to the deliverability of the site in relation to its nature conservation value.

- xx. Does the SA support the principle of the allocation?**
- a. The overall effects of the SA for SP8 are positive particularly with regard to economic growth, employment and the use of brownfield land. A potential negative impact is recorded with regard to biodiversity and air quality but suitable mitigation measures are identified (CSSD 05a Section 4, 5 and Appraisal Matrix).
 - b. The designation provides protection to both employment use and nature conservation offering flexibility to the Core Strategy for any change in future circumstances in line with PPS4 and PPS12. Other policies within the CS also provide further support for protection of the nature conservation value e.g. SP13 Open Spaces and Biodiversity.
 - c. Some uncertainty is shown in the SA, which will be addressed in later stages of the planning process such as the Site Allocations DPD and planning application requirements.

- xxi. **Is reclassification suitable in lieu of the nature conservation value of the site, its location in relation to residential property and with regard to issues of air quality and traffic congestion?**
- a. The reclassification of DEA6 to LSIS is suitable in lieu of the nature conservation value of the site.
 - b. The Council has continued to protect this site as a Site of Importance for Nature Conservation (SINC). The SINC designation has not been removed. The dual designation of SINC and LSIS must be balanced and it is accepted that the site cannot be developed for employment use without any adverse effect on biodiversity.
 - c. Accordingly, in line with PPS1 (para 19, Page 8) the level of impact will be mitigated or compensated for as a requirement of any planning application submitted for development on the site.
 - d. Amendments to the Core Strategy, as proposed during the June 2011 EiP hearing, have resulted in the following amendment:

“The Council will not permit development on SINCS or LNRs unless there are exceptional circumstances and where the importance of any development coming forward outweighs the nature conservation value of the site. In such circumstances, or where a site has more than one designation, appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided. Each case will be looked at on its merits having regard to all material considerations” (Haringey Core Strategy, Section 6.3 Open Space and Biodiversity. Page 158, Para 6.3.23. Amendment to 7th sentence).
 - e. The reclassification of DEA6 to LSIS is suitable in lieu of its location in relation to residential property and with regard to issues of air quality and traffic congestion.
 - f. The saved Haringey Unitary Development Policies are still relevant and will deliver appropriate development in terms of impact upon residential properties, in terms of pollution and of traffic congestion. The strategic policies within the Core Strategy and saved UDP policies will be maintained as policies within the Development Management DPD.
 - g. In line with the London Plan, amelioration of development is required with regard to impact in terms of pollution and traffic congestion. Methods can include on-site measures such as design solutions and buffer zones.
 - h. Assessment of any proposed development on air quality, vehicle movement and congestion will be required. These assessments within

a planning application will have to give details of the scale and impact of the development upon the local area and would require mitigation where the impact is significant.

- i. Developers contributions and mitigation measures will be secured through planning conditions, Section 106 agreements or the Community Infrastructure Levy as appropriate.
- j. The standards of mitigation required for development of a LSIS allocation will be the same as for development under the previous employment designation. The reclassification will therefore have no material change in the requirements of impact mitigation on air quality and congestions. This approach is consistent with PPS 23, planning and pollution control.

- xxii. To what extent has the site been considered against alternatives? (other uses including Local Nature Reserve)**
- a. The SA process has followed the guidance and regulations with regard to the assessment of alternatives. The findings can be found in Preferred Options report and Submission SA (CSSD 05) The SA assessed both spatial options (5 options including business as usual) and policy options. Further alternatives for the site have not been assessed at this stage because they have not been considered to be 'reasonable alternatives'.
- b. With specific reference to the option of a Local Nature Reserve this has not been considered for the following reasons:
- Protection to nature conservation is already provided through the SINC designation
 - Evidence supports the need to protect employment use, particularly in the west of the borough (Atkins Employment Land Study, 2008 and draft update 2012)
 - Policy requires a flexible approach to plan making (PPS4/PPS12)
 - The site is not in the ownership of the Council
 - The site does not have public access
 - The site is contaminated
 - The site is not managed and has not been for many years. A management strategy would be needed
 - The designation does not rule out the possibility to consider an LNR in the future if circumstances permit.