

Freehold Community Association

Submission to the NPPF consultation - 13th June 2012

Introduction

At a meeting held at our Community Centre in December 2009 with the North London Waste Plan a number of our members and residents raised their serious and legitimate concerns that the then proposed commercial transaction between the London Borough of Barnet and The North London Waste Authority was influencing the outcome of where the requirement for additional waste treatment site (s) where likely to be located rather than the required evidence and waste policy. And that, despite the protection that our community and a site with the sustainability credentials of Pinkham Way should be afforded by the planning process, the deal would be of far more importance. This attitude was, understandably, reinforced when in February 2011 the NLWA showed extraordinary confidence in their proposals by paying Barnet £12 million of public money for approximately 3/4 of the 6.6ha Pinkham Way site, prior to achieving any form of planning permission and also knowing that their proposals would be subject to 2 independent public enquiries.

Whilst our members perception of the NLWA proposal was understandable it was clearly very subjective and may have been a very unfair conclusion to draw. The reasonable alternative was, of course, that the NLWA proposal had such high sustainability credentials that they would pass Haringey's sustainability tests, that it may be measured against. We considered therefore, that it was fair and important for us to assess the sustainability credentials of the NLWA proposal based on the actual evidence we had available.

We were fortunate, in February 2011, when the NLWA held a staffed exhibition in our community of their detailed proposals, that would be submitted to Haringey. These details where presented by way of 11 exhibition boards and a very detailed scale model of the proposed building. For ease of reference we have reproduced the panels as part of this submission.

We considered this evidence to be sufficient for us to prepare our own Freehold Sustainability Assessment of the Barnet and NLWA proposals for the Pinkham Way site. The purpose of this assessment would hopefully have two outcomes.

Firstly, it would provide an objective evidence based test of the sustainability credentials of the proposal particularly in relation to Haringey and their compliance with the National Planning Policy Framework.

Secondly, as we have not been consulted by Haringey in general nor in relation to the Pinkham Way site, we have used the assessment to present evidence, based on our significant local knowledge, of the site and it's importance to our community.

Method of Assessment

Sustainability.

Various groups and people place different interpretations on this. However, in terms of planning for development Sections 6 to 10 of the National Planning Policy Framework give a very clear definition of planning sustainability with paragraphs 18 to 219 giving the Governments view of what sustainable development is and the active role Planning Authorities have to play in guiding development to sustainable solutions.

Waste planning, in terms of achieving the goal of enhancing our social, economic and environmental futures, faces a significant challenge. The waste process, collection and treatment, is vital to our well being but it has significant negative impacts on our current position. It is therefore vital that a sound plan actively eliminates the negative impacts and maximises the sustainability gains.

For example, if the NLWA were to spend £12 million purchasing a 6ha impermeable industrial site. Build an MBT plant on 2.8ha of it and create a 3.2ha site of importance for nature conservation with full public amenity access then their development would clearly maximise the sustainability gains and meet the required sound sustainable standards of the local planning framework. However, if it were to spend £12 million purchasing a 6ha site of importance to nature conservation with a long history of public amenity access. Build a 3.0ha MBT plant and a 1.2ha vehicle lorry park leaving 1.8ha of green space which, because of the processes being carried out on the site, the public would be excluded from. Then clearly this would be maximising the negative impacts of the development and would not meet the required sound LDF sustainable development required under the NPPF.

Freehold Community Association

Presentation and assessment

In common with the various assessments contained in the NLWP we decided to present our assessment in tabular form referencing the various NLWA development details highlighted on the exhibition panels.

We have scored the various details as follows: -

Sustainability loss or negative impact = -1

No impact or irrelevant = 0

Sustainability gain or positive impact = +1

We considered this to be a fair way of assessing the sustainability impact of the numerous details of the proposal to the overall sustainable impact of the final development. We have also used the table to highlight compliance or otherwise with the National Planning Policy Framework.

PPS 10 - Planning for Sustainable Waste Management states at paragraph 2 -

- 2. Positive planning has an important role in delivering sustainable waste management:**
- through the development of appropriate strategies for growth, regeneration and the prudent use of resources; and,**
 - by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time.**

Our concern is, of course, the sustainability of the waste management facilities being in the right place.

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FREEHOLD SUSTAINABILITY ASSESSMENT

NLWA EVIDENCE	FCA OPINION / COMMENT	NATIONAL POLICY	LPA STRATEGIC/SPECIFIC ENVIRONMENTAL IMPACT REQUIRED	COMMENTS OTHERS	SUSTAINABILITY SCORE
<p>Panel 2 - Point 1 "Why do we need more facilities"</p>	<p>Why do we need an extra treatment plant If the amount of waste requiring treatment is to be reduced and the recovery of recyclables is to be increased. Significant risk of the MBT Plant becoming redundant by 2040.</p>				<p>-1</p>
<p>Panel 3 - Point 2 "Where will new facilities be located"</p>	<p>Development of Pinkham Way will need to have less environmental impact than the other 3 undisclosed locations.</p>	<p>NPPF Section 218 footnote 41</p>	<p>PPS 10 Sequential Strategic Environmental impact assessment of site choices required.</p>		<p>-1</p>
<p>Panel 3 - Point 3 "What type of waste facilities are likely to be proposed"</p>	<p>Uncertainty over volumes of waste arisings requires flexibility to decrease as well as increase waste treatment. How flexible is the MBT treatment process? Will it need to import non -waste green products to maintain plant efficiency by 2040?</p>				<p>0</p>

FREEHOLD SUSTAINABILITY ASSESSMENT

NLWA EVIDENCE	FCA OPINION / COMMENT	NATIONAL POLICY	LPA STRATEGIC/SPECIFIC ENVIRONMENTAL IMPACT REQUIRED	COMMENTS OTHERS	SUSTAINABILITY SCORE
Panel 4 - Point 4 "Why Pinkham Way"					-1
"centrally located within the NLWA area"	Irrelevant. Environmental impact of significant traffic generation. Taxi cab geometry assessment required to establish centre of waste routes for NLWA area	NPPF Section 32	Transport assessment required to establish sequential transport impact of alternative sites		-1
"it has excellent road access from the strategic road network (A406)"	The site has no direct access to or from the strategic road network. Significant impact on local road network. Routes to the A406 only via small traffic light controlled elevated giratory system of Colney Hatch Lane and Pegasus Way. Significant Increase in existing congestion.	NPPF Section 34	Traffic Impact assessment required to establish impact on local road network compared to alternative sites.		-1
"it has a long history of waste use"	Untrue. Sewage treatment and solid waste treatment are completely different processes. Environmental impact of lorry movements required by solid waste treatment not required by sewage treatment. From 1891 to 2012 (121 years) only 17 years of unlawfull landfill. From 1963 to 2010 (47 years) local amenity use "as of right".				0
"There is no housing immediately adjacent to the site"	There is significant housing, a public park and community centre located within 10m of the site.				0

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NLWA EVIDENCE	FCA OPINION / COMMENT	NATIONAL POLICY	LPA STRATEGIC/SPECIFIC ENVIRONMENTAL IMPACT REQUIRED	COMMENTS OTHERS	SUSTAINABILITY SCORE
Panel 4 - Point 4 continued "Why Pinkham Way"					
"it is a sufficient size (6.6ha)"	Size required for 300,000 tonne MBT Plant is 2.8ha. Unnescessary and excessive land take.		Sequential environmental tests requires comparison of sites of similar size.		-1
"it is designated as an employment site" and locally significant industrial site	It is designated as a Site of importance for nature conservation. Any development will be required to maintain or enhance nature conservation. Predicting outcome of independent public enquiry.	NPPF Section 22	Sequential environmetal impact assessments required to establish less impact in comparison to other sites suitable for industrial development		0
"It's impact on ecological designation (SINC Borough Grade 1) can be mitigated"	The development will destroy 64% of the existing 6.6ha Grade 1 SINC. Cannot be mitigated.Gone forever.	Section 9	Sequential environmental impact assessment required to establish other SINC's where less impact possible	See pages 18	-1
It is a brownfield site" "beneficial use" "job creation" (Previously Developed)	It is not a brownfield site. It has had 47 years of significant local community amenity use as well as a significant change in it's character.	NPPF Section 111	Site specific impact assessment required		0
"clean up a contaminated site"	Significant and concentrated site use by diesel lorries plus the outputs from the MBT process will create another contaminated site.	Sections 22	Se investigation required		-1

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<p>Panel 4 - Point 5 Relationship to the NLWP "consultee"</p>	<p>Partners in Joint Waste Strategy along with the 7 Boroughs, Partners in North London Waste Limited along with the 7 Boroughs, NLWA is governed by the 7 Boroughs, Partners with LB Barnet, one of the 7 Boroughs, in development of Pinkham Way. Planning application to LB Haringey another one of the 7 Boroughs. Slightly more than a consultee to the 7 Boroughs of the North London Plan.</p>				<p>0</p>
<p>Panel 5 - Point 6 "Areas of open space to provide ecology areas and landscape screening"</p>	<p>Due to the site processes the site will not be open and available for public access. Full public access to the existing 6.6ha ecology site has been available "as of right" since 1963. The landscaping will destroy more of the existing mature flora.</p>	<p>NPPF Section 74</p>		<p>Validated Town Green Application</p>	<p>-1</p>

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<p>Panel 5 - Point 7 "Why is a depot for Barnet Council included in the scheme"</p>	<p>THIS IS A VERY GOOD QUESTION. The Barnet depot has no relevance to the North London Waste Plan process and should not be accommodated. The inclusion of this 144 lorry park has caused a significant increase in the environmental impact of the proposal. It has increased the land take required without justification and has clearly skewed the selection of appropriate sites. However if it included then alternative sites in the North London area should be assessed but we assume Barnet would not accept a site in Edmonton as suitable for their lorry park. A Barnet problem should be solved in Barnet.</p>		<p>Sequential test required to identify sites suitable for MBT Plant and 144 Lorry Park throughout the NLW area.</p>		<p>-1</p>

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<p>Panel 5 - Point 8 "Employment"</p>	<p>The NLWA claim this to be a "key benefit of the scheme" It is a claim they can't deliver as they will not be the final employer. The best they can do is try to influence the final waste developer via the procurement process but this will not be a contract breaking situation. Any employment that may be created will be subject to the legal duties of the Directors of the waste developer to trade solvently and cannot be dictated by the NLWA or anyone else. However, as North London Waste Ltd they are the employer and have the ability to fully support the regeneration of the Lee Valley</p>	<p>NPPF Section 22</p>			<p>-1</p>

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Panel 5 - Point 8 "Employment"	<p>The NLWA claim this to be a "key benefit of the scheme" It is a claim they can't deliver as they will not be the final employer. The best they can do is try to influence the final waste developer via the procurement process but this will not be a contract breaking situation. Any employment that may be created will be subject to the legal duties of the Directors of the waste developer to trade solvently and cannot be dictated by the NLWA or anyone else. However, as North London Waste Ltd they are the employer and have the ability to fully support the regeneration of the Lee Valley</p>	NPPF Section 22			-1
Panel 5 - Point 9 Area required for 300,000 tonne MBT Plant 2.8ha	Site of 6.6ha not required. How many 2.8ha sites, already designated as industrial, are there in the North London Waste Plan Area?		Sequential tests must compare sites of similar capacities.		-1
Panel 5 - Point 10 Green Roof	A green roof 23m above ground is not conducive with dog walking.	NPPF Sections 73 - 78		Site identified as Local Green Space Validated Town Green Application	-1

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Panel 6 - Point 11 Traffic and Access "excellent to A406"	Not as good as the Edmonton Eco Park to the A406	NPPF Section 32	Site specific traffic impact study required.		-1
Panel 6 - Point 12 & 12a Traffic	<p>Declaring the number and type of vehicles that would use the site does not disclose the significant impact that their trips would generate. With some pushing the NLWA finally admitted 1150 trips a day every day 365 days a year. The impact on the local road network will be significant. Diesel particulates, air quality, noise, vibration, congestion, increased damage to local road infrastructure, increased Borough road maintenance costs, Increased consumption of fossil fuels, Stop start through light controlled giratory, Significant reduction in stacking lane capacities,</p>	NPPF Sections 109 - 110	Environmental Impact to select sites with direct access to strategic road network over local road network		-1
Panel 7 - Point 13 Visual Impact and landscape	345,000 cubic meter building 23 meters (75ft) high. See pages XX and XX	NPPF Sections 59, 99 and 109		See pages 99	-1

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Panel 8 - Point 14 Ecology					
Retention of existing mature trees on two boundaries	Giving us back what we already have is not enhancement. Destroying 2.4 ha of the rest of the existing woodland is a definite and significant loss.				-1
Largest green roof in London reflecting the brownfield nature of the site	This is complete gibberish. A green roof can only reflect the greenfield nature of the site and greenfield sites are of significant environmental importance	See NPPF derivation of Brownfield to Previously Developed Land. Glossary of terms, Annex 2 pg 55			-1
Green Walls	Irrelevant. NLWA admit they fail. Especially when they are 23m high.				0
Retention and enhancement of planting. Southern and Western boundaries.	Giving us back what we already have is not enhancement.	NPPF Section 109			-1
Creation of new habitats for bats	Having destroyed 80% of the existing sustainable habitat for bats. They will create a sustainable habitat with bat boxes and a bat cave. This will hardly enhance the sustainable future of a protected species.	NPPF Section 109	Impact from noise, light pollution, air pollution, human and vehicle activity on a protected species required compared to sites with no sustainable bat habitat.	Bat Conservation Trust See page 2	-1
No development of Western boundary	Giving us back what we already have is not enhancement.	NPPF Section 109			-1

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NLWA EVIDENCE	FCA OPINION / COMMENT	NATIONAL POLICY	LPA STRATEGIC/SPECIFIC ENVIRONMENTAL IMPACT REQUIRED	COMMENTS OTHERS	SUSTAINABILITY SCORE
Panel 8 - Point 14 Continued Ecology					
Creating invertebrate habitat	Giving invertebrates back less than they have at present is not enhancement	NPPF Section 109	Impact on sustainable habitat for protected and other invertebrate species required	Natural England - Optimal habitats pg 2	-1
Bird, Bat and invertebrate boxes across the site to attract a range of species.	As opposed to the existing natural Tree, shrub and grass habitats already occupied by a massive range of species. No enhancement over the natural attraction of the existing or future habitat offered by the site. Once the species have been driven out by the development work will they return to a 300,000 tonne MBT plant with a 144 lorry park.	NPPF Section 109	Impact on biodiversity	Defra - Biodiversity 2020 - Not included in this document	-1
Creation of wetland, pond reed bed and swale	This is a real diamond amongst a load of paste. And it would be a significant habitat enhancement. Especially as the site did have numerous ponds but these were filled in by Barnets landfill. Unfortunately, because of the proposed intense development on the site it is hard to see where these features could be located. Also they would soon become contaminated by the site processes. Particularly from the diesel particulates and the dust.				0

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Panel 8 - Point 14 Continued Ecology					
New areas of copse planting. Enhancing biodiversity.	Giving back less than the site currently offers biodiversity is not enhancement	NPPF Section 109	Impact on sustainable biodiversity required	Defra - Biodiversity 2020 - Not included in this document	-1
Improved site management	From 1963 to date nature has managed the site and apart from the unwanted interference by Barnet it has done an excellent job and will continue to do so. Of course this management has been completely free and that is a significant sustainable economic gain.				0
Panel 6 - Point 15 Surveys to establish existing ecological value of the site.	Sustainability is not about what is there now. It is about what will be there in the future. So it's not about the ecological value now it's about it's ecological value once most of it has been destroyed by the development of a 300,000 tonne MBT Plant with a 144 lorry park. This proposal cannot, by any definition, improve the ecological value of the site over its value now or in the future.	NPPF Section 109	Impact on sustainable biodiversity required	Defra - Biodiversity 2020 - Not included in this document	-1

FREEHOLD SUSTAINABILITY ASSESSMENT

NLWA EVIDENCE	FCA OPINION / COMMENT	NATIONAL POLICY	LPA STRATEGIC/SPECIFIC ENVIRONMENTAL IMPACT REQUIRED	COMMENTS OTHERS	SUSTAINABILITY SCORE
<p>Panel 8 - Point 16 "ecological measures" "a significant investment in the site to off set the impact of development"</p>	<p>The proposed ecological measures do not enhance the ecological value of the existing site. If the NLWA does not invest in ecological measures on the site by not building a 300,000 MBT Plat and 144 lorry park would there be a loss to it's sustainable ecological value or a significant gain. If the NLWA wish to invest in ecological measures are there other sites that would actually benefit from this investment.</p>	<p>NPPF Section 109</p>	<p>Ecological investment impact off alternative sites required</p>		<p>-1</p>
<p>Panel 8 - Point 17 Education and visitors centre</p>	<p>Up to the erection of a fence (without planning permission and therefore unlawful) around the site by Barnet in July 2010 our children, visitors and anyone else has had access to study, observe, interact and just enjoy 6.6ha of natural habitat and environment. Teachers from our local school have used the site as a hands on teaching aid for seeing and studying first hand the sites established flora and fauna. The irony is not lost on us that having destroyed most of it's environmental educational value the NLWA and Barnet are going to educate us in what a great environmental job they are doing. We believe that most people would prefer to visit a site of importance for nature conservation to learn about nature rather than a 300,000 tonne MBT plant.</p>	<p>NPPF Sections 73 to 75</p>		<p>Validated Town Green Application - Supporting evidence of uses over 20+ years</p> <p>See pages 2 and 9</p>	<p>-1</p>

FREEHOLD SUSTAINABILITY ASSESSMENT

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<p>Panel 9 - Point 18 "ground conditions are not considered to be a risk to health"</p>	<p>At least not until they start excavating for foundations and clearing the site. Good news for the Town Green</p>		<p>Health impact required of construction disturbance of contaminated land</p>		<p>-1</p>
<p>Panel 9 - Point 19 Drainage and Flood risk</p>	<p>See our drainage impact to surrounding areas including the Zone 3 flood plain of Bounds Green Brook.</p>	<p>NPPF Sections 101 to 103</p>	<p>Sites over 1ha Site specific drainage impact assessment required</p>	<p>EA FRA Guidance - Not included in this document</p>	<p>-1</p>
<p>Panel 10 - Point 20 Safeguarding Amenity "mitigate the visual impact of the development"</p>	<p>Imposing a 345,000 cubic meter building into the existing natural landscape. See pages XX and XX</p>	<p>NPPF Sections 53, 81, 91, 109, 103, 117 and 156</p>		<p>See pages 9 and 10</p>	<p>-1</p>

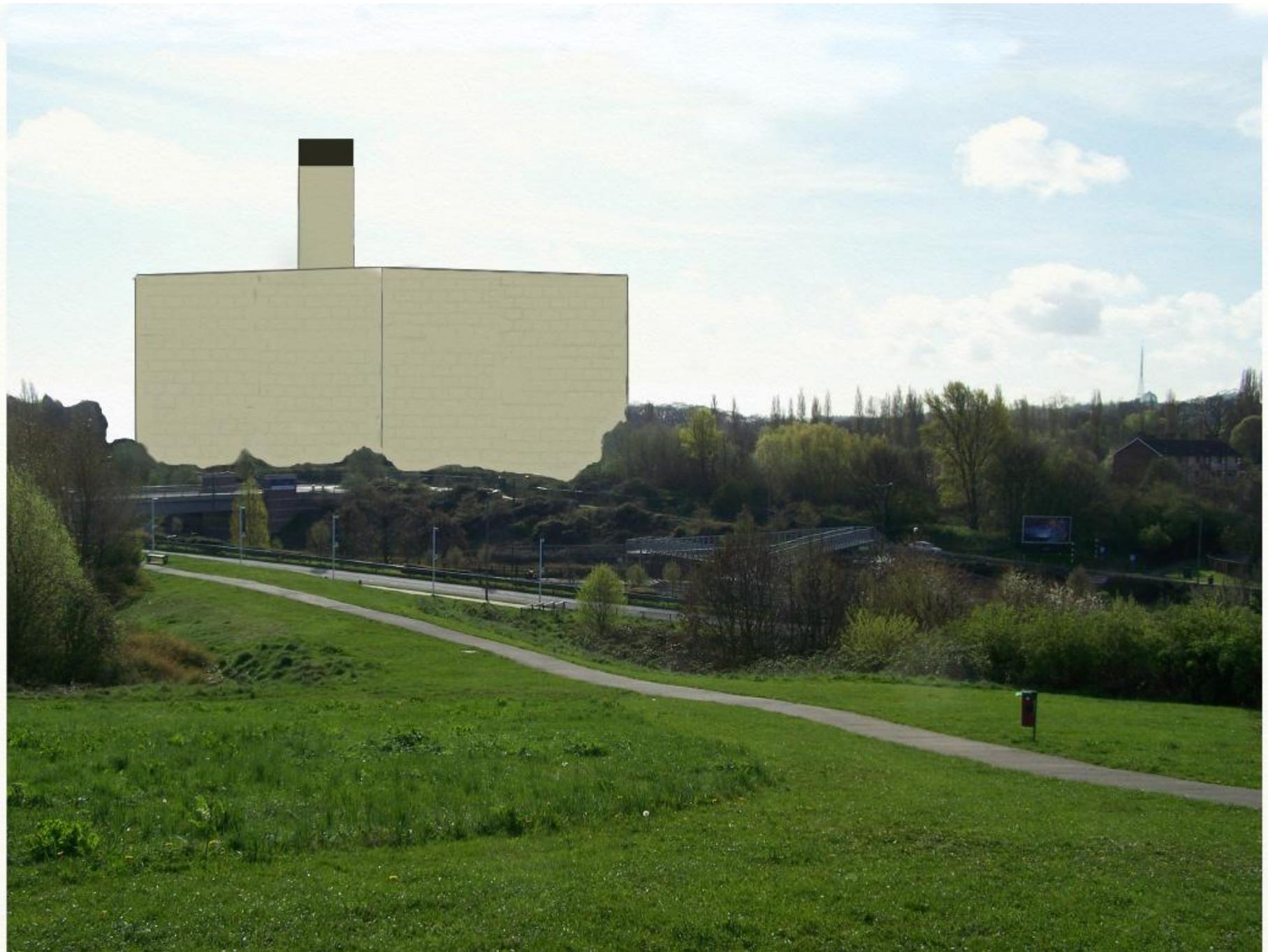
FREEHOLD SUSTAINABLE ASSESSMENT

NLWA EVIDENCE	FCA OPINION / COMMENT	NATIONAL POLICY	LPA STRATEGIC/SPECIFIC ENVIRONMENTAL IMPACT REQUIRED	COMMENTS OTHERS	SUSTAINABILITY SCORE
<p>Panel 11 - Point 21 Next steps "outline planning application for submission to London Borough Haringey"</p>	<p>An outline planning application cannot be made or validated or accepted by an LPA that involves a change of use.</p>				<p>0</p>
				<p>TOTAL SUSTAINABILITY SCORE</p>	<p>- 31</p>









Bat Conservation Trust

Trees, woods and hedgerows

Woodlands are an important habitat for bats.

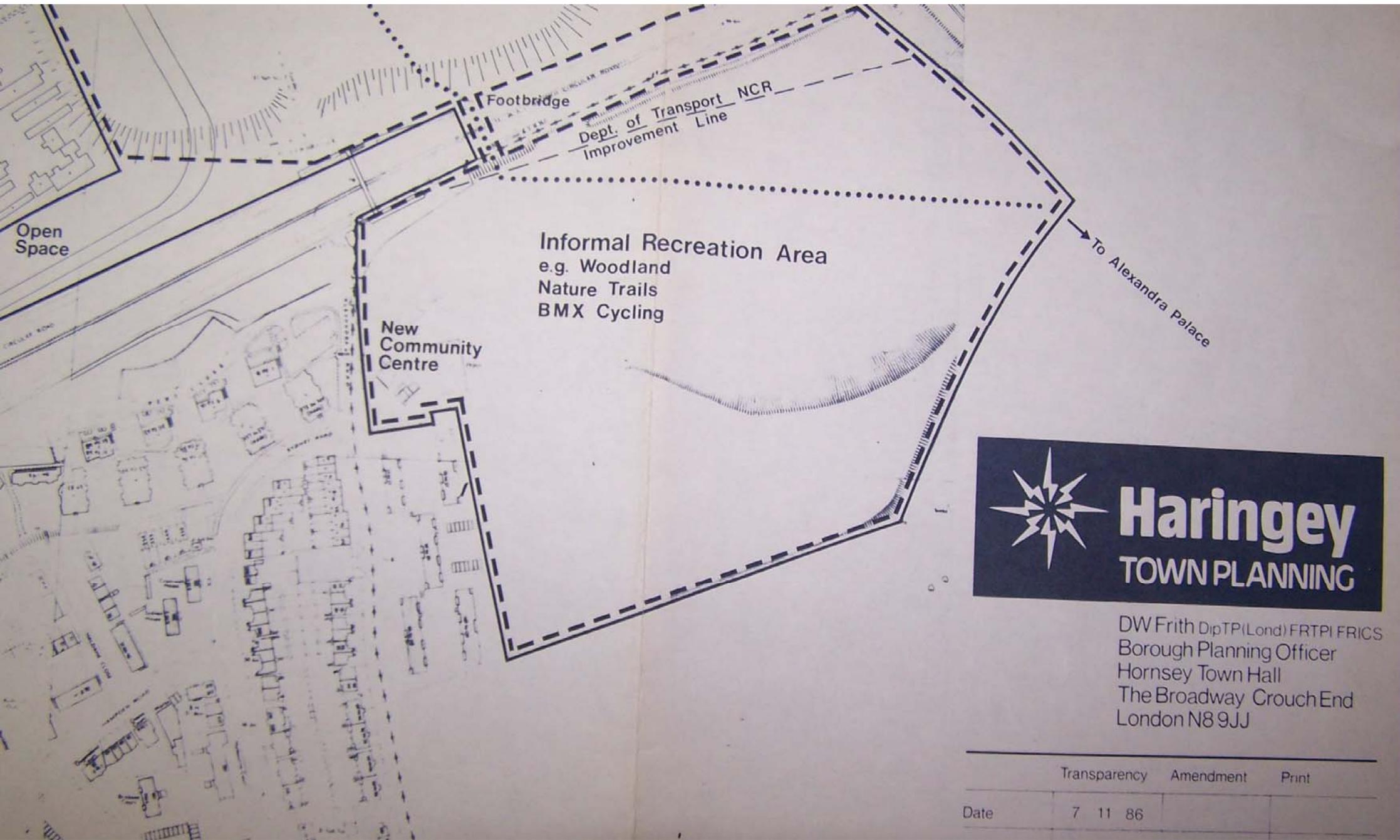
Tree habitats are an important type of natural habitat which support nearly all species of bat and play a fundamental role in their life cycle. They use trees for roosting sites where they can give birth to their young in a protected and sheltered environment and in winter they can safely hibernate in deep crevices. Tree habitats with their associated shrubbery attract a wide variety of insects which bats prey on and they also utilise trees and hedgerows as navigational landmarks for their nocturnal flight path. The edges of woodland and hedgerows are linear features which create a corridor for bats to commute from one area of countryside to another such as from their roost site to new foraging grounds.

Natural England

Standing Advice Species Sheet: Reptiles

1. Typical Habitat/Features Used

Typical reptile habitats include brownfield sites, allotments, compost heaps, railway/road embankments, south facing banks, chalk grassland, rough grassland and areas where there is a diverse structure such as grassland with scrub edges. Grass snakes will often favour habitats near wetland areas and ponds. Sand lizards and smooth snakes are more often associated with dry heathland. Woodland sites can often be important hibernation areas for reptiles.



Commons Act 2006
Application to Register Land as a Village Green Under Section 15(1)

"The Dump"

Land bounded by Alexandra Road London N10, Pinkham Way (A406) London N10,
The Great North Railway and Muswell Hill Golf Course London N10

EXHIBIT C

LIST OF SOME OF THE ACTIVITIES CARRIED OUT AS OF RIGHT

- 1) Dog Walking
- 2) Walking
- 3) Jogging
- 4) Bike Riding
- 5) BMX Trials/Dirty Biking
- 6) Motorbike Riding/Teaching
- 7) Motorbike Scrambling
- 8) Nature Watching/Study ie Birds,Bats,Butterflies,Grass Snakes,Newts
- 9) Bird Spotting
- 10) Train Spotting
- 11) Camping/Camp Building
- 12) Cooking/Camp fires/BBQ's
- 13) Childrens games ie Run outs, block he, IT
- 14) Meeting friends/Hanging out
- 15) Victorian and Edwardian bottle collecting
- 16) Golf Ball recovery
- 17) Nature study for educational projects
- 18) Bonfire night celebrations
- 19) Astronomy/Star watching
- 20) Fruit picking
- 21) Picnics
- 22) Photography
- 23) Football
- 22) Frisbee
- 23) Skating (In line skates)
- 24) Teaching woodcraft and outdoor activities
- 25) Tree climbing
- 26) Treasure Hunts

FREEHOLD DRAINAGE IMPACT ASSESSMENT

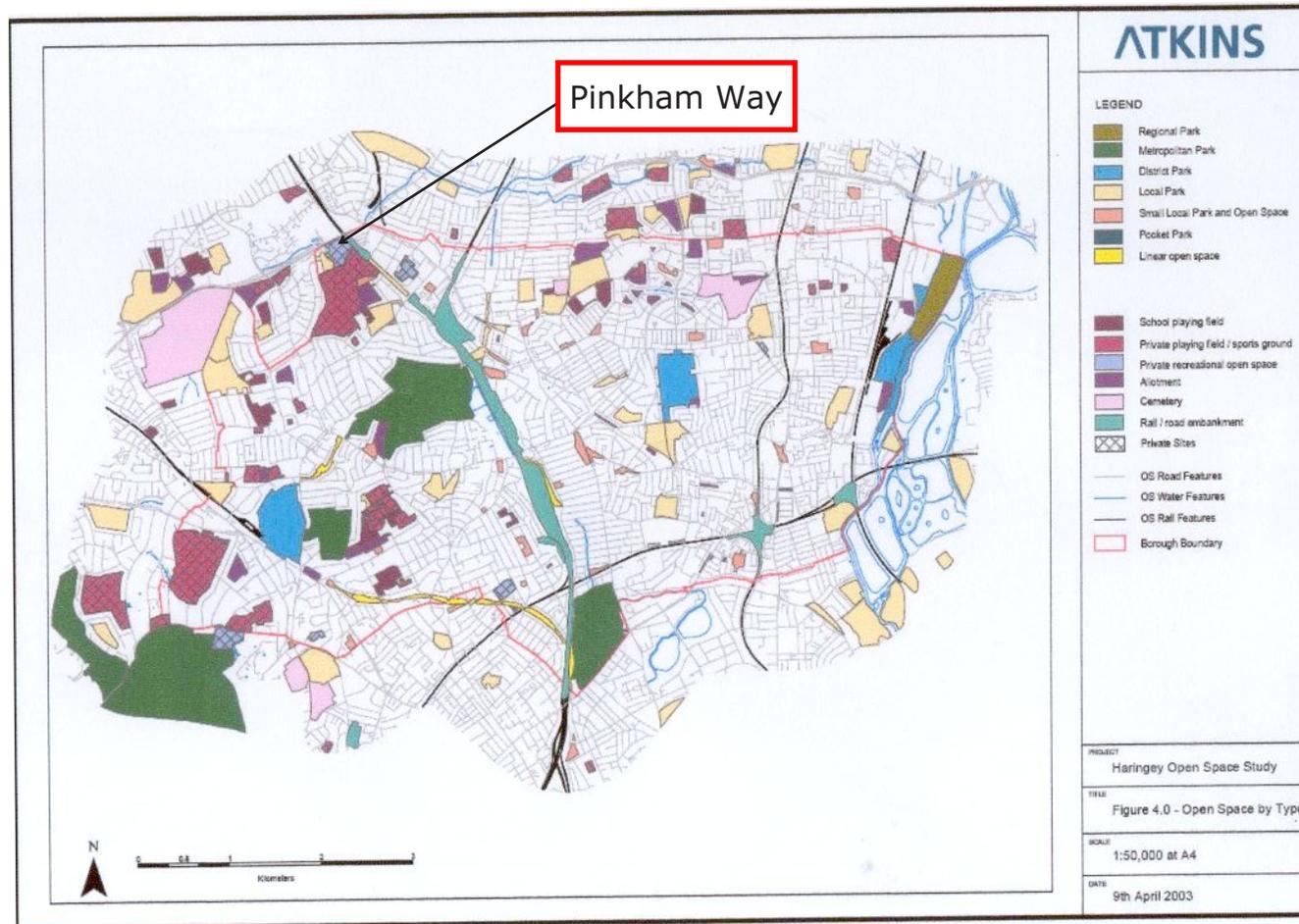
ASSESSMENT CRITERIA	PRE-DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040	POST DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040
<p>NPPF Section 100 to 103, Technical Guidance to the NPPF, Environment Agency FRA Guidance Note 3 - ALL SITES OVER 1ha REQUIRE A SITE SPECIFIC FLOOD RISK ASSESSMENT</p>	<p>PERMEABLE SITE AREA = 6.6ha</p>		<p>IMPERMEABLE SITE AREA = 5.3ha inc. significant 23m high walls to building</p>	
<p>Average annual rainfall for London - 630mm</p>	<p>6.6ha greenfield area. Fully permeable Volumetric run off from site = 0 cum/year</p>	<p>Total Volumetric run off = 0 cum</p>	<p>Impermeable area inc. 23m high walls of building. Volumetric run off from site = 33,390 cum/year</p>	<p>Total Volumetric run off = 934,920 cum</p>
<p>Required Climate change allowance - 30% = 819mm AAR</p>	<p>Total average annual run off = 0</p>	<p>Total Volumetric run off = 0 cum</p>	<p>Total average annual run off = 43,407cum</p>	<p>Total Volumetric run off = 1,215,396 cum</p>
<p>Sites over 1ha requires site specific assessment including impact to surrounding areas</p>				

ASSESSMENT CRITERIA	PRE-DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040	POST DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040
National design standards for sustainable urban drainage systems.				
Highest sustainable system - Permeable Suds. - no connection to any water course or sewer. All rainfall is retained on site and returned to suitable underlying strata.	Pinkham Way fully meets the highest standard of sustainable urban drainage systems. The substantial tree, shrub and grass cover provides significant disposal of rainwater through transpiration. NO VOLUMETRIC RUN OFF FROM SITE	Greenfield sites are vital in the challenge presented by climate change	Permeable SuDS not possible due to underlying strata and contamination. Less sustainable urban drainage system required.	Adds to our risks from climate change
Medium sustainable system - Attenuated SuDS - Discharge to watercourse. Requires reduction in run off rate from site with volumetric storage on site. DOES NOT REDUCE VOLUMETRIC RUN OFF FROM SITE	NOT REQUIRED	NONE	If using connection to existing culvert under site and discharging to Bounds Green Brook :- Attenuation SuDS required. NO REDUCTION IN VOLUMETRIC RUN OFF	Total Volumetric run off = 1,215,396 cum
Lowest sustainable system - Attenuated SuDS - Discharge to Sewer. Requires reduction in run off rate from site with volumetric storage on site. DOES NOT REDUCE VOLUMETRIC RUN OFF FROM SITE	NOT REQUIRED		Connection to sewer unlikely.	

ASSESSMENT CRITERIA	PRE-DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040	POST DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040
National design standards for sustainable urban drainage systems.				
Attenuated SuDS to Bounds Green Brook	Not connected	None	Greenfield equivalent run off rate @ 2 l/s/ha = 10.60 l/s = 38.16 cum/hr	Risk to Bounds Green Brook Zone 3 Functional Flood Plane approx. 300m downstream of the culvert connection.
Impact of 1 in 30 year storm from Flood Study Report. Note: FSR under-estimates volumes compared to Flood Estimation Handbook	NONE	NONE	Volume of on site storage required under FSR 6hr storm = 2,564 cum. Total volumetric runoff under FSR storm = 2,792 cum. At allowed discharge rate the on site system will impact on the flood plane for just under 3 days. Increased risk of flooding due to sequential storms hitting the site and the flood plane.	Significant impact and risk to Zone 3 Functional Flood Plane downstream of the site connection. High risk to strategic road network A406 from flooding

ASSESSMENT CRITERIA	PRE-DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040	POST DEVELOPMENT DRAINAGE IMPACT OF SITE	IMPACT BY 2040
National design standards for sustainable urban drainage systems.				
Attenuated SuDS to Bounds Green Brook	Not connected	None	Greenfield equivalent run off rate @ 2 l/s/ha = 10.60 l/s = 38.16 cum/hr	Risk to Bounds Green Brook Zone 3 Functional Flood Plane approx. 300m downstream of the culvert connection.
Impact of 1 in 100 year return storm + 30% climate change from Flood Study Report. Note: FSR under-estimates volumes compared to Flood Estimation Handbook	NONE	NONE	Volume of on site storage required under FSR 6hr storm = 4,480 cum. Total volumetric runoff under FSR storm = 4,709 cum. At allowed discharge rate the on site system will impact on the flood plane for 5 days. Significantly Increased risk of flooding due to sequential storms hitting the site and the flood plane.	VERY Significant impact and risk to Zone 3 Functional Flood Plane downstream of the site connection. High risk to strategic road network A406 from flooding

Figure 3.2 - Open Space by Type



Source: Open Space and Sports Assessment – Volume 1, Atkins, 2003

Freehold Community Association

Submission to the Sustainability Assessment consultation - 24th May 2012

Conclusions

The significant negative impact score of our sustainability assessment of the NLWA proposals should be of serious concern to both the NLWP and LB Haringey. It certainly is to our community.

The local traffic and environmental impact of the development does not meet the NPPF sustainable development policies and sites should be allocated as defined in PPS 10 - Sustainable Waste

the planned provision of new capacity and its spatial distribution should be based on clear policy objectives, robust analysis of available data and information, and an appraisal of options. Policy objectives should be in line with the planning policies set out in this PPS and be linked to measurable indicators of change;

PPS 10 further provides the following:-

Identifying suitable sites and areas

20. In searching for sites and areas suitable for new or enhanced waste management facilities, waste planning authorities should consider:

- opportunities for on-site management of waste where it arises; - Pinkham Way will not provide this

- a broad range of locations including industrial sites, looking for opportunities to collocate facilities together and with complementary activities. - Pinkham Way does not provide this

21. In deciding which sites and areas to identify for waste management facilities, waste planning authorities should:

(i) assess their suitability for development against each of the following criteria:

- the extent to which they support the policies in this PPS; - Pinkham Way does not support the PPS policies

- the physical and environmental constraints on development, including existing and proposed neighbouring land uses (see Annex E); - Pinkham Way, as well as being a SINCE is bounded by two significant recreational areas, Hollickwood Park and Muswell Hill Golf Course. It has an important physical constraint as it has no direct access to the strategic road network.

- the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential;

- the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport. - Pinkham Way offers no opportunity to develop non road transport use and will be reliant throughout it's life on lorry transport for both import and export of waste and its products. - The capacity of the Colney Hatch Lane flyover and the Pegasus Way bridge is not capable of providing the sustainable transport of waste.

(ii) give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages. Under the NPPF Pinkham Way is excluded from consideration as previously developed land as all evidence of previous use is now gone and it's character has undergone a significant change to Greenfield and woodland. It has also developed significant amenity use.

Pinkham Way does not support the PPS Sustainable waste policies and therefore must be a fatal flaw to the Sustainability Appraisal document and ultimately to the soundness of the North London Waste Plan.

Chris Faulkner

Chairman - Freehold Community Association - 24/05/12

Pinkham Way EcoPark – pre-application exhibition

Welcome

Welcome to this exhibition about the North London Waste Authority (NLWA) and London Borough of Barnet's proposals to develop a waste treatment facility and vehicle depot to be known as the EcoPark at Pinkham Way.

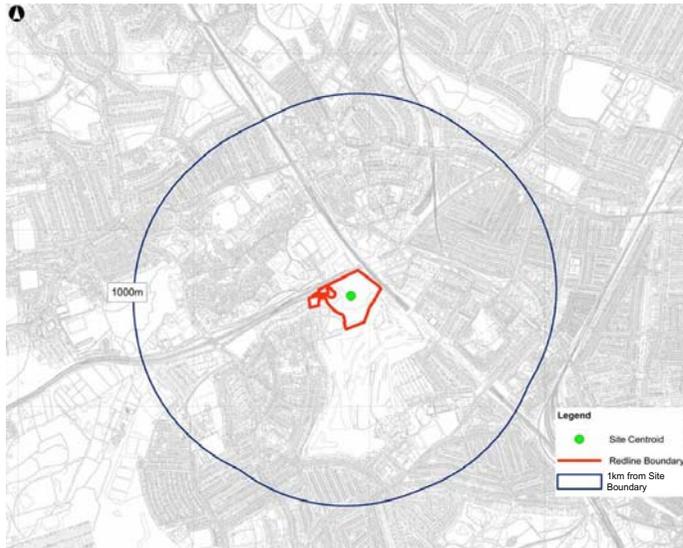
We are holding this exhibition to let you know about our plans for the site and to show how the proposed facility will turn rubbish into a valuable resource. It also shows how this facility fits in with wider waste plans in the north London area and how it will help ensure that of the 900,000 tonnes of waste we produce in north London each year, more will be recycled and less will have to be sent to landfill.

To inform the finalisation of the scheme we would welcome any comments that you have on the proposals that we have set out in this exhibition. Copies of feedback forms are available for you to complete. We will review your comments to inform the outline scheme that is submitted for planning we will also report what you said and how this has influenced the proposals in the planning application.

Please take your time to look at the panels; there are also staff available if you have any questions. We value your comments and feedback so we can build this into our future plans.

Who we have invited

We have sent a leaflet to all households within one kilometre of the site. We have also written to local residents associations, ward councillors, your MP and site neighbours. Additionally we have advertised the exhibition in local newspapers and on our websites



Pinkham Way EcoPark – pre-application exhibition

Context

What is the NLWA?

The NLWA is one of the UK's largest waste disposal authorities, serving an area with a population of 1.7 million. The NLWA was established in 1986, as the statutory waste disposal authority for Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.



The boroughs each collect your waste and the NLWA manages its recycling and disposal. Approximately 900,000 tonnes of municipal waste is recycled and disposed of each year in the NLWA area. This is made up of a mix of domestic waste from 750,000 households, occasional bulky waste, fly tipped waste, litter and some waste from local businesses.

What you can do

We are all responsible for minimising the waste we generate and re-using and recycling wherever possible to reduce the volumes of waste that must be managed. Some information about waste minimisation is available at the end of the exhibition.

Why do we need new facilities?

A combination of environmental and regulatory factors means that it is necessary to provide new facilities to manage the disposal of your waste, including:

Recycling Rates

The NLWA and the seven constituent boroughs have set a target of recycling or composting 50% of waste by 2020, in line with national and London-wide targets. We currently recycle approximately 30%. To achieve these changes we all need to work together to reduce waste, manage rubbish better and to recycle more. New facilities will help ensure that more of your waste can be recycled.

How do we dispose of your waste?

Currently approximately 30% of north London's waste is recycled. The rest is sent either the energy from waste incinerator at Edmonton, run by a company called LondonWaste Ltd, or landfill sites in the home counties. The diagram below shows how we currently dispose of your waste and what is proposed in the future.

Waste collected



Current Household Waste Management



Future Household Waste Management



Landfill Directive

The EU Landfill Directive requires us to reduce the amount of waste that we will send to landfill each year. If we do not reduce the amount of waste going to landfill then we would be fined and the cost would need to be met from Council Tax bills.

We could be fined up to £30 million per year. Furthermore landfill is an extremely expensive way of disposing of waste. By 2014/15 each tonne of waste sent to landfill is expected to cost £120 per tonne. Our aim is to cut the proportion of waste sent to landfill from 36% to less than 15%.

European Procurement Rules

The existing disposal contract with LondonWaste Ltd (who dispose of north London's waste), will come to an end in 2014. Under European regulations the NLWA is required to competitively procure a new operator to provide waste disposal services.

It is expected that existing waste management sites will be retained (or re-provided nearby), but it is also necessary to provide new facilities that will ensure recycling and landfill targets are met.

Pinkham Way EcoPark – pre-application exhibition

Delivering new facilities

The procurement process

The NLWA has invited bidders, through a competitive procurement process, to outline plans for waste disposal in north London over the next 25-35 years. We expect the successful contractor to be known in late 2012.

This will not change the way that your waste is collected, but will ensure that we can meet Government targets in respect of diverting waste from landfill, increasing recycling rates and reducing long-term costs.

These plans will indicate the type of facilities needed across north London to manage waste. These facilities will have to be state of the art in terms of delivering high quality environmental solutions and value for money. The fundamental objectives of the procurement are to manage the disposal of waste:

- in a safe, efficient and effective manner;
- to maximise recycling, composting and reuse;
- minimise untreated waste sent to landfill;
- maximise energy production from waste that cannot be recycled; and
- minimise the impact our waste has on climate change

Waste which cannot be recycled or composted can be made into Solid Recovered Fuel (SRF) a dry, stable fuel. SRF can be used to generate heat and electrical energy, in place of fossil fuels such as oil, coal and gas. This diverts waste from landfill and maximises the use of waste produced. An example of SRF is in the jar.

SRF will not be burnt to convert the fuel to heat or electricity at this site. Instead the fuel would be transported to a location where it will be used to generate heat and/or power. The NLWA is running a separate procurement process for a fuel use contract, which will identify a fuel user. At this stage we do not know who will be selected through the competitive procurement process.

Where will new facilities be located?

The NLWA has identified four potential sites where new waste facilities might be located, including the site at Pinkham Way. These sites are in addition to the household waste recycling centre network (civic amenity recycling centre, such as Summers Lane).



What types of waste facilities are likely to be proposed?

The NLWA expects that Mechanical Biological Treatment (MBT) or similar will be proposed at the Pinkham Way site. MBT technologies are used to sort and treat residual waste and include mechanical systems followed by a biological treatment facility. Systems can vary in terms of the degree of mechanical sorting and the type of biological process applied.

The materials sorted from the waste and the end products of the process can vary depending on the separation process employed.

MBT is predominantly a sorting, drying and volume-reducing process but can also help in the recovery of any remaining recyclable materials that were not separated before the waste was collected.

3

In



Residual waste

Mechanical Biological Treatment



Mechanical separation



Biological treatment: anaerobic or aerobic

Out



Recyclates



Solid Recovered Fuel

2

Pinkham Way EcoPark – pre-application exhibition

Why Pinkham Way?

The site is considered to be suitable for development for a number of reasons:

- it is centrally located within the NLWA area;
- it has excellent road access from the strategic road network (A406);
- it has a long history of waste use (former sewage treatment works and landfill site);
- it is bordered by the A406, East Coast rail line, a golf course and a park (with housing beyond). There is no housing immediately adjacent to the site;
- it is a sufficient size (6.6 hectares/ 16.3 acres) to accommodate facilities required;
- it is designated as an employment site in the Unitary Development Plan and a Locally Significant Industrial Site in the emerging Core Strategy;
- its impact on its ecological designation (SINC Borough Grade 1) can be mitigated through well designed and managed development;
- it is a brownfield site and our proposals could put it to beneficial use including job creation;
- development will provide the opportunity to clean up a contaminated site;

Relationship to the North London Waste Plan (NLWP)

The NLWP Preferred Options, published in October 2009, identifies the Pinkham Way site as a potential waste management site. This Plan has been produced for the north London boroughs and will form part of each Borough's Local Development Framework. (the documents that set out policy for the local area)

It should be noted that the NLWA does not produce the NLWP. The NLWA is consulted and asked to comment, along with bodies such as the Greater London Authority (GLA) and Environment Agency.

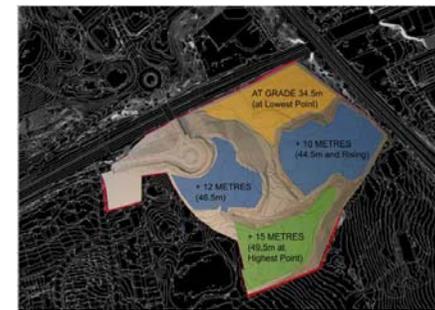
4



Site area – 6.6 hectares

Road access

5



Historic Site Uses

Topography

Existing sources of noise



Nationally Designated Ecology Sites

Ecological designations

Flood risk

Pinkham Way EcoPark – pre-application exhibition

So, what is proposed at the Pinkham Way site?

The NLWA and London Borough of Barnet propose the redevelopment of the Pinkham Way site to create an eco-park that will contribute to sustainable waste management in North London comprising:

- A waste management facility building of approximately 15,000 sq.m (excluding associated plant and vessels) with the capacity to accept up to 300,000 tonnes of waste per annum for processing and management including extracting dry materials for recycling, composting/biological treatment and creating solid recovered fuel;
- A visitors / education centre;
- A refuse and recycling collection vehicle and passenger transport vehicle depot;
- Areas of open space to provide ecology areas and landscape screening;
- Associated access, infrastructure, plant, vessels, welfare facilities and site offices.

When would new facilities be operational?

Subject to appointing a new waste management contractor, securing all of the required planning permissions and environmental permits the operational start date for the depot is expected to be summer 2015 and the new waste facilities is expected to be spring 2016.

Why is a depot for Barnet Council included in the scheme?

London Borough of Barnet provides a range of services to its residents, including waste and recycling collection, street cleaning and passenger transport (minibuses). **These services are not a part of the NLWA procurement** and will continue to be provided by London Borough of Barnet. Currently the base for these facilities is a depot in Mill Hill.

The Mayor of London has identified Mill Hill East as an Intensification Area where housing and employment uses should be prioritised. Subsequently planning

permission has been granted for redevelopment of a site including the current depot. This requires the depot to be relocated to allow 2,500 new homes and 500 new jobs to be created.

The Council's fleet of vehicles and associated administration staff are proposed as a part of the Pinkham Way site, but not all existing depot uses would be relocated here. The vehicle maintenance workshop, salt barn and winter gritting fleet would be relocated at other sites.

Part of the Pinkham Way site is already owned by the Council. Using this site will deliver best value and avoid Council Tax payers paying a premium for another site to be bought. The Council believes there are synergies between the depot and waste facilities, with the potential to reduce road journeys and carbon emissions.

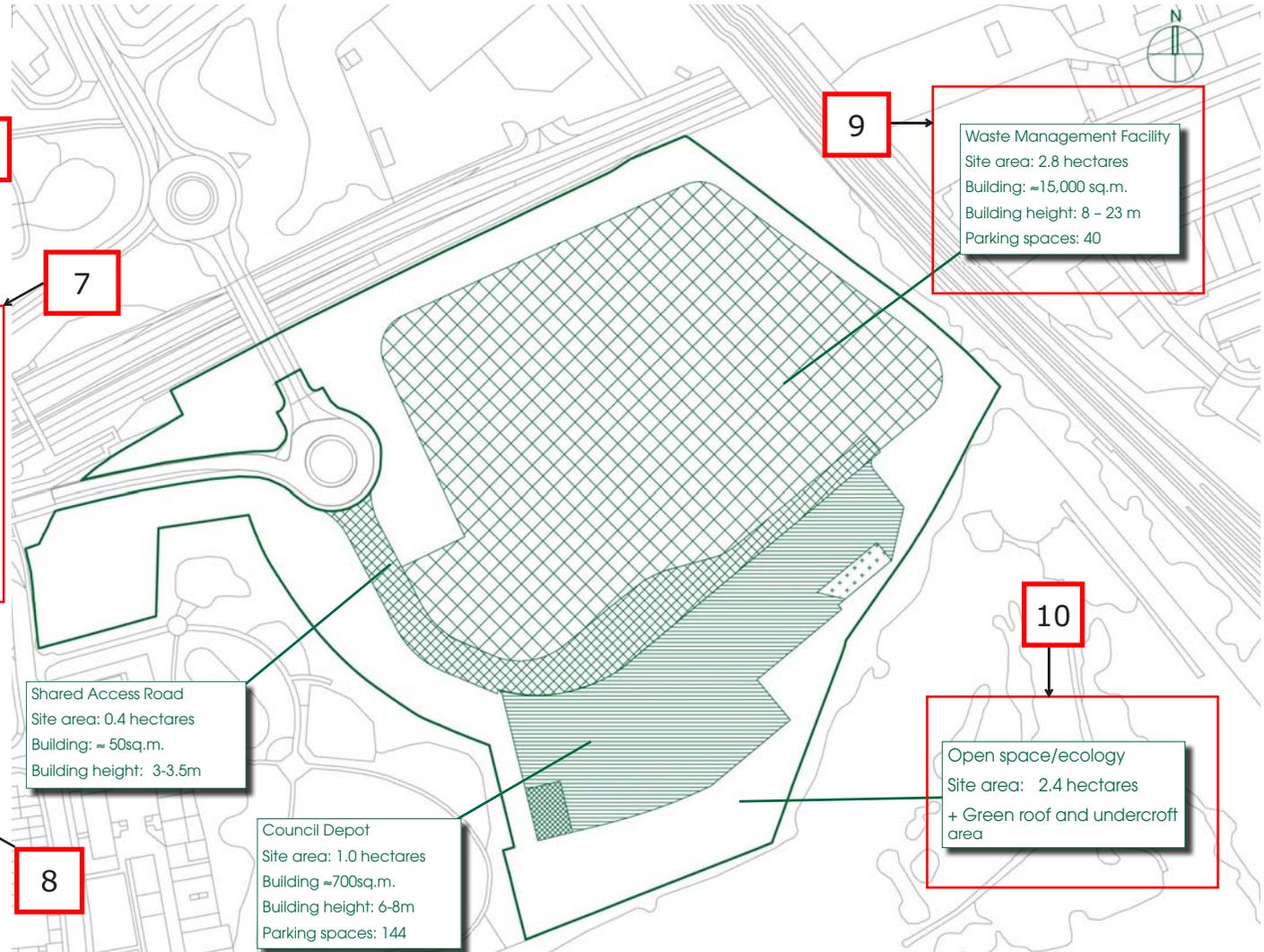
Employment

The site is designated for employment use in the UDP and emerging Core Strategy. Employment designations are used to safeguard land from other development (e.g. housing) so that the Council has an adequate bank of land where jobs can be created.

It has been estimated that more than 200 full time jobs will be created by the development when it is operational, with a mix of managerial, skilled and semi-skilled operative and administrative opportunities. The waste facility alone is expected to generate around 60 full time posts.

There is the potential to create several hundred opportunities during construction.

The opportunity to create new jobs is considered to be a key benefit of the scheme, not least because there is the opportunity for skills development in a sector that continues to grow.



Pinkham Way EcoPark – pre-application exhibition

Traffic and Access

Getting to the site

The site is centrally located in the North London area, next to the A406 between the junctions with the B550 (Colney Hatch Lane) and A109 (Station Road/ Bounds Green Road). Access to the site will be via the roundabout at the junction of Pegasus Way with Orion Road, off the A406 which provides excellent access to the strategic road network.

We considered a number of options for ways in which the site could be accessed. This included access direct from the A406; however the site's proximity to the railway bridge and the difference in ground levels between the A406 and the roundabout mean this option is not possible. The proposed access is considered to be the most viable solution with the least impact on the highway network.

The site will not be accessed by local residential roads such as Sydney Road.

Within the site the proposed access road has been aligned to:

- Provide sufficient on-site queuing (should this be required);
- A bypass lane within the site to prevent congestion;
- Reduce the height of the road relative to Hollickwood Park so that the impact of the access road is reduced as much as possible.

11



Getting to the site

Traffic

A full transport assessment will be prepared as a part of the planning application for the site. This document will assess the impact of the proposed development on the road network and identify any improvements required to ensure the development does not result in congestion.

At this stage it is estimated that around 560 vehicles will enter and leave the site each working day. The trips will be made up by a combination of refuse and recycling collection vehicles as well as lorries picking up recycled, Solid Recovered Fuel (SRF) and other materials, staff and visitors vehicles.

Expected shift patterns associated with operation of the site mean that many staff will arrive between 0600 and 0700, with a smaller number of office staff arriving for 9am or afternoon shifts (around 2-3pm). Early shifts are necessary to ensure that collection vehicles avoid rush hour.

Trips associated with the depot part of the scheme will generally be condensed in distinct morning and afternoon periods as staff arrive and leave. There will be some overnight operations (street cleaning) with vehicles leaving in the early evening and returning in the early morning.

Trips associated with the waste facility part of the scheme will be spread through the day.

A number of the vehicles will be replacing trips that already run on the A406 when delivering waste and recyclates to the existing operations at Hendon and Edmonton. The new site at Pinkham Way has the potential to reduce some congestion on the A406 by shortening those trips.

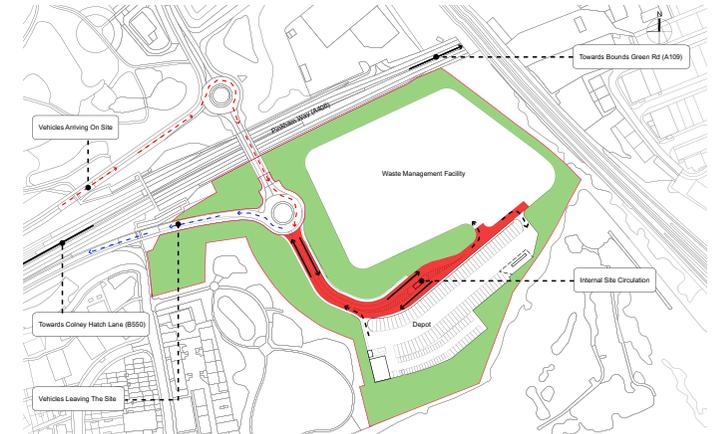
Parking

Staff and visitor car and cycle parking will be provided on site, ensuring that there is no impact on local on-street parking. Site management during construction and operation will ensure that on-street parking is not permitted.

The scheme will also consider what green travel measures can be incorporated to encourage staff and visitors to walk, cycle or use public transport to get to the site.

Cycle parking will also be provided at the site so that secure facilities are available for staff and visitors.

12



Circulation plan



Typical site vehicles

12a



Cleaning vehicles

Pinkham Way EcoPark – pre-application exhibition

Visual Impact and Landscape

13

The site has an existing topography that generally slopes down from the south west to the north. Existing levels vary across the site from the lowest level adjacent to the A406 (approx. 34.5m AOD) to the highest levels in the south west corner (approx. 49.5m AOD).

To accommodate the proposed development a generally flat site is required. The proposals will utilise the existing topography to minimise the visual impact of the development, whilst reusing existing on-site materials to minimise the quantity of material (and the associated vehicle movements) to be taken off site.

As shown on the site model the development will cut into the existing site levels in the west and south west parts of the site, this includes the site access road which will slope down into the site. At the northern and eastern parts of the site the development will be higher than the existing levels. This level will be similar to the Friern Barnet Retail Park and the industrial estate across the railway to the east.

The zone of visual influence has been generated to identify the locations from which the development is likely to be seen. The illustrations below indicate what you might be able to see based on the outline proposals. Existing mature vegetation and existing development will screen some views. The proposed building to the east (on Bounds Green Industrial Estate) will also screen some views.

Landscaping of the site is central to the proposals. All landscaping should contribute to enhancing the ecological value of the site as well as screening the proposed development. The following landscaping principles are proposed for the site.

- Utilisation of native species only;
- Landscape strategy to enhance the ecological value of the site;
- Functional low maintenance planting in and around operational areas;
- Retention and enhancement of existing planting where possible;
- Informal planting at site edges to minimise views into the site.

Options that are being considered for site landscaping are set out on the landscape masterplan drawing:

Landscaping options

Options that are being considered for site landscaping include:

Enhancing the **western edge** of the site with Hollickwood Park, options that are being considered include:

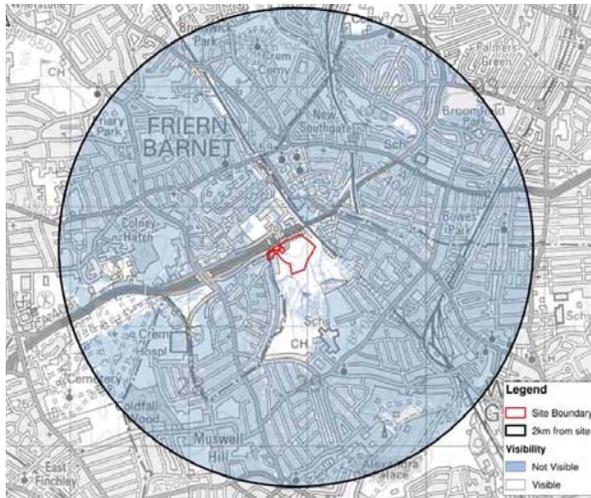
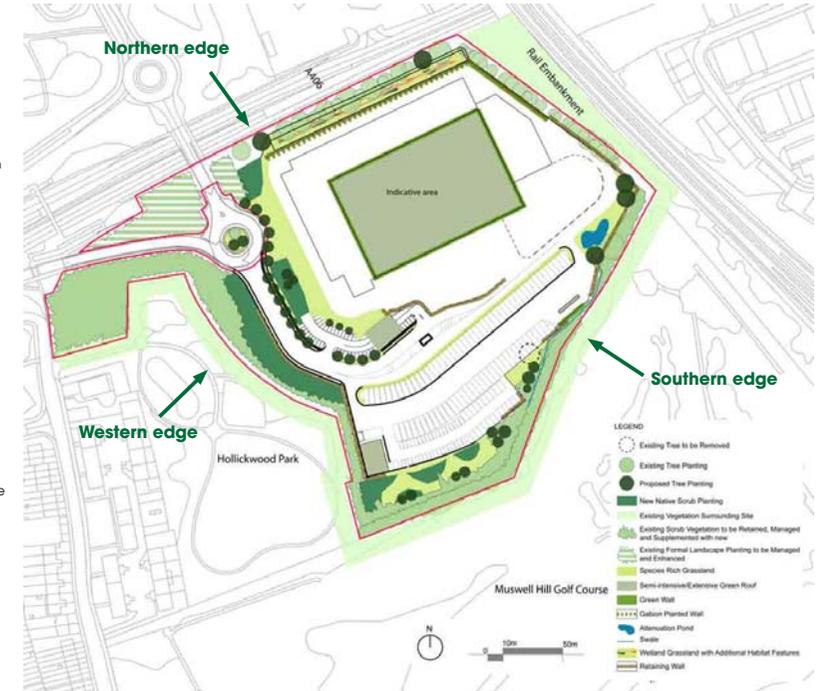
- strengthening existing planting within the site to increase the level of planting between the development and the park;
- introducing a new earth embankment that can be landscaped / planted, which may require removal of some existing planting;
- additional planting within Hollickwood Park at its boundary with the site.

Enhancing the **southern edge** of the site next to golf course, options that are being considered include:

- strengthening existing planting at key points to minimise views of the proposed development;
- incorporating a green wall alongside the vehicle refuelling points to minimise views of this activity;
- opening up some areas of the southern embankment to create areas of new habitat for invertebrates.

Enhancing the **northern edge** of the site alongside the A406; in addition to retention of the existing trees options that are being considered include:

- planting of additional trees at A406 level to fill any gaps;
- inclusion of a green wall along the northern boundary at site development level.



Pinkham Way EcoPark – pre-application exhibition

Ecology

The site is within a Site of Importance for Nature Conservation (SINC) of Borough Grade 1 importance. The site is designated for its botanical diversity and uncommon plants – Bee Orchid and Golden Dock. Adjacent to the site is the Bluebell Woods and Muswell Hill Golf Club SINC (Borough Grade 1 importance), Hollickwood Park SINC (Borough Grade 2 importance) and a green corridor follows the rail line.



A series of ecological surveys have been completed to establish the existing ecological value of the site; no Bee Orchids and limited evidence of Golden Dock has been recorded. Further surveys will be completed to monitor ecology on the site. Enhancing the ecological value of the site is an important aspect of the overall re-development.



We are looking at the potential (at ground, below ground and roof levels) to include the following in the development:

1. Retention of existing mature trees along the northern and eastern boundaries.
2. Green roofs – designed to reflect the brownfield character of the site; possibly to include areas of Bee Orchid, enabling its re-introduction to Pinkham Way. It has the potential to be one of the largest green roofs in London.
3. Green walls – using trailing and climbing plants. Planted walls are not as sustainable (as they require significant irrigation and have been seen to fail in a number of other examples).
4. Retention and enhancement of existing planting on western and southern boundaries where possible.
5. Creation of new areas of habitat for bats including a planted undercroft area at the northern edge of the site and a provision of bat hibernaculum – a bespoke built structure similar in scale to a pill-box to create a home for bats on the southern boundary.
6. No built development in the western most part of the site.
7. Habitat creation for invertebrates along the southern boundary – such as log and rubble pile basking and hibernacula.
8. Bird, bat and invertebrate boxes across the site to attract a range of species.
9. Creation of new wetland areas such as a pond, reed bed and swale.
10. New areas of copse planting, standard tree and scrub planting utilising native species to enhance the biodiversity on the site.
11. Improved site management.

14



15

The options for ecological measures to be included in the site are being discussed with the local planning authority and will represent a significant investment in the site to offset the impact of development. As a part of the planning application the ecological effects of the development will be assessed in the Environmental Statement and prior to development it will be necessary to agree an ecological management plan with the local planning authority. Additionally an ecology landscape plan will be prepared that sets out how different areas of the site will be landscaped to provide ecological benefits alongside screening of the development.

16

Education / visitors centre

In addition to the physical measures above, the proposals will include the provision of a visitors/ education centre on the site. The centre could provide

an education resource for those interested in finding out about sustainable waste management and also environmental education associated with brownfield site regeneration. To support the provision of a visitors/ education centre the following measures are also being considered:

- Monitoring of site regeneration by a local ecology group or university; including provision of on-site accommodation for storage of site records and to act as a base for data collection.
- Accompanied access to areas of new habitat. Due to the proposed use of the site, unrestricted access is not feasible.
- Provision of environmental interpretive material for education centre.
- Webcams to monitor activity on the green roof and in the bat hibernacula.

17

The NLWA and London Borough of Barnet believe that these measures will contribute to offsetting any impacts of development of the site.

Pinkham Way EcoPark – pre-application exhibition

Ground Contamination

Historically the site was used as a sewage treatment works and for landfill. The remnants of the sewage treatment plant are visible at the northern end of the site. There is also evidence of uncontrolled fly tipping following closure of the sewage treatment works. This includes abandoned cars, empty oil drums, tyres and electrical appliances.



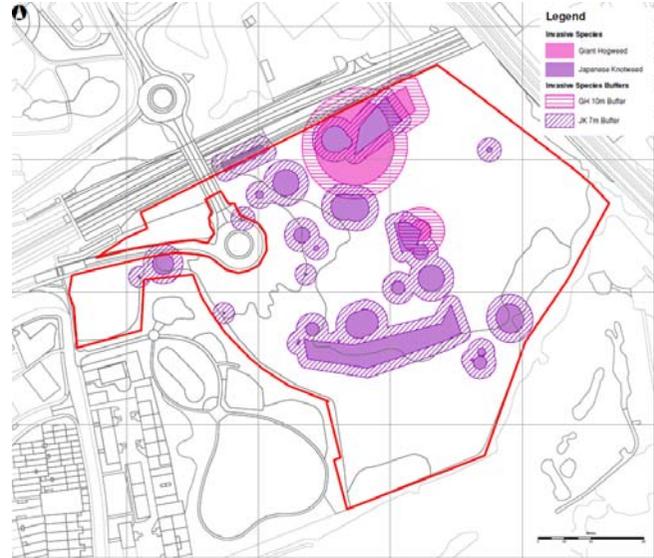
Historic Site Use – Sewage Treatment Works

Non-native invasive plant species (Japanese Knotweed and Giant Hogweed) are present on the site, and have been accurately mapped to prevent them spreading and to eliminate them for the future. A programme of works to eradicate the Giant Hogweed has already started.

Two phases of ground investigation have been undertaken under the supervision of Jacobs in 2008 and Arup in 2010. The investigations were undertaken to establish the underlying geology and to gain information on the contamination status of the site (soils, controlled waters and ground gases).

The site investigations have identified that most of the results were below national soil criteria and are regarded as uncontaminated for the end use and current environmental setting. Some areas of contamination that are consistent with the former use of the site were however identified. These include very low levels of asbestos and hydrocarbons (similar to compounds found in coal and tar) in localised areas. Some low levels of contaminants were also found in the perched groundwater, which is discontinuous and sporadic across the site. The existing ground conditions are not considered to be a risk to health.

18



Location of Invasive Species

Development will be undertaken under controlled conditions that will minimise any risk of harm to health and the environment when the ground is disturbed during construction. These measures are defined in the Environmental Statement (agreed with the local authority) and in the remediation strategy completed in accordance with Environment Agency guidelines. The Contractor undertaking the construction is required to monitor the works, dealing with any unexpected conditions, and checking the quality of soil as the work progresses. They are required to submit a report confirming the activities were undertaken in accordance with the recommendations.

As a part of the planning application, a remediation strategy will be submitted setting out the proposed approach to improving the site and making it suitable for development. Haringey Council, the local planning authority, and the Environment Agency will agree the proposed remediation approach.

The following remediation principles are proposed for the site:

- Re-use as much material on site as possible to minimise the impacts of off-site disposal to landfill. Disposal of surplus soils in accordance with current waste management regulations;
- Recommendations for eradication of non-native invasive plant species;
- Removal, treatment and disposal of contaminated perched water;
- Placement of 0.75m of verified suitable soils in landscaped areas; and
- Retain top soils for re-use on site if suitable.

Drainage and Flood Risk

The majority of the site is in Flood Zone 1 – an area of low flood risk. The northern part of the site, adjacent to the A406 and at the lowest level is in Flood Zone 2 and 3a, where there is a higher risk of flood. Policy states that waste development can be established in Flood Zones 1 and 2, and development will be directed to these areas. Development in Flood zone 3a requires further assessment to be completed.

On-site flood storage will be provided to ensure that development of the site will not have a negative impact on the wider area. The approach to flood storage is being discussed with the Environment Agency and includes detailed hydraulic modelling to establish the volume of on-site flood storage that is required. A flood risk assessment will be submitted as a part of the planning application

A culvert runs under the site. A survey has identified that the culvert is in very poor condition and needs to be replaced. The drainage strategy for the site will identify the route for the replaced culvert to ensure that it can be properly maintained in the future.

19



Existing Site

Existing Site



Japanese Knotweed

Giant Hogweed

Pinkham Way EcoPark – pre-application exhibition

Safeguarding Amenity

0

The Environment Agency will regulate operation of the site to ensure that it complies with all relevant regulations, including those in respect of air quality, odour and noise. Prior to operation of the site a site management plan will have to be agreed with the Environment Agency and the operator will be required to comply with that plan.

At this stage details of proposed buildings will not be included in the planning application. Instead these measures will be 'reserved' for consideration by the local planning authority at a later stage. This approach has been adopted as the contractor selected to operate new waste disposal services will be responsible for detailed site design. However, the following principles will be incorporated into the design of buildings to ensure that local amenity is maintained:

The waste management facility will enclose waste management activities within buildings. This approach has been proposed to ensure the following:

- **Noise** associated with operation of site plant is minimised. Where necessary acoustic mitigation will be provided to insulate the buildings.
- **Odour** associated with the operation of the site is enclosed and treated by odour control measures. Any emissions will be tightly controlled and monitored by the Environment Agency. Local air quality should not be reduced. Dependent upon the type of odour control technology there may be a requirement for a stack.
- **Any dust** associated with the operation of the site is managed through dust suppression measures and

The building proposed within the depot facility will primarily provide office, storage and staff welfare facilities (showers and lockers).

Site wide measures will include:

- Efficient and effective site management will be adopted to ensure that the site is well maintained and operated. There will be core operating hours when the site will be in use and there will not be collections or deliveries outside of those hours, although it should be noted that the proposed resource management facility plant will operate 24/7. A site management plan will be agreed with the Environment Agency and will ensure that any local issues are addressed quickly and effectively.
- A comprehensive landscaping plan will be provided to mitigate the visual impact of the development. Landscaping proposals for the site will further contribute to reducing amenity impacts arising from the development, e.g. noise. The images below provide an indication of what you might see once the development is in place (based on a worst case scenario).
- Design to create development areas that re-use existing materials on site, so reducing the need for traffic associated with its disposal off-site.
- Where possible the site would be cut into the existing landform, or new earth bunds created so that a physical barrier which can be landscaped is created, for example, between the site and Hollickwood Park.

The planning application will include an Environmental Statement that will include chapters on noise and air quality.



Viewpoint 3 with redline indicating maximum height of Development Area A



Viewpoint 5 with redline indicating maximum height of Development Area A

Pinkham Way EcoPark – pre-application exhibition

Your feedback

To inform the finalisation of the scheme we would welcome any comments that you have on the proposals that we have set out in this exhibition. Copies of feedback forms are available for you to complete. We will review your comments and report what you said and how this has influenced the proposals in the planning application.

Copies of the exhibition panels together with a list of frequently asked questions and answers will be available on the NLWA and London Borough of Barnet's websites. If you require any further information please send an email to: pinkhamway@nlwa.gov.uk or write to us at NLWA, Unit 360 Lee Valley Technopark, Ashley Road, Tottenham, London, N17 9LN.

Next Steps

The NLWA and London Borough of Barnet will prepare an outline planning application for submission to London Borough of Haringey in spring 2011. The planning application will be supported by a number of technical documents including

- Environmental Statement
- Transport Assessment
- Flood Risk Assessment
- Design & Access Statement
- Sustainability & Energy Assessment
- Health Impact Assessment

Once the planning application is submitted Haringey Council will write to neighbours to provide the opportunity to comment on the application. A copy of the planning application will be made available on the NLWA and London Borough of Barnet's websites.

If planning permission is granted construction would be likely to start in spring/summer 2014, with a view to the site being operational in summer 2015 for the depot part and spring 2016 for the waste facility.

If you have any other questions please speak to one of our team who will try to assist.

2

