

# MH3 - Former Friern Barnet Sewage Works - Pinkham Way

## Freehold Community Association submission to the Site Allocations DPD

*Haringey Planning statements shown in blue. FCA comments shown in red.*

**“This document identifies 54 of the most strategic sites in the borough,.....”**

**As an identified “Strategic site” Pinkham Way requires significant Environmental Impact and Flood Risk Assessments along with evidence from a Local Economic Assessment to justify it’s inclusion in a list of “Strategic employment sites”. Haringey have failed to produce the required evidence led justification for inclusion of Pinkham Way in any development proposals.**

**“The site is currently vacant and access is not currently permitted. It has good vehicle access of a roundabout from a slip road on to the dual car-riageway A406 Pinkham Way, part of the North Circular.”**

**Vehicular access to the site is via a complicated giratory system traversing up to 5 sets of traffic lights. Stacking lengths for traffic are severely restricted by the use of two bridges across the A406. Any development of Pinkham Way will have a significant impact on the giratory with increased traffic queues. This will result in an increase in air pollution in an area already exceeding national air quality standards by nearly 100%. The site is poorly served by public transport and Haringey have failed to identify any plans to improve this as part of their proposals for Pinkham Way. Without an identified transport infrastructure improvement any employment will require higher car use.**

**“Historically the site was a sewage treatment works and subsequently it was used for landfill by the London Borough of Barnet. The remnants of the sewage treatment works which closed in the 1960s are visible at the northern end of the site.”**

**The site area is 62,000 sqm with approximately 10sqm of concrete walls 600mm high still visible. However, these walls are now covered in lichens and mosses providing important habitats and have blended into the landscape.**

**“At present the site is not in active use and there is no access to the public.”**

**Between 1963 and 2009 (46 years) the site was used by local residents as a significant public open space. This was recognised in 1986 by Haringey Planners and shown on a site allocations plan at that time. (Copy available). With the the full knowledge of Haringey Planners the land owners erected a fence around the site without planning permission and without the required consultation with local residents.**

**“It has been retained in employment land designa-tion. It currently has dual designation as a Local Employment Area and a Site of Important Nature Conservation (Borough Grade I).”**

**We have been unable to find any other example of a Planning Authority giving dual designations to a site that so obviously conflict with each other.**

**“This site was considered as a potential location for future waste manage-ment facilities through the recently withdrawn North London Waste Plan.”**

**The NLWP Inspector concluded that the North London Waste Plan was“not legally compliant”. There was no choice over withdrawal and a significant amount of public money was wasted.**

**“Representations to maintain the potential for this site to achieve a waste management function have been received as part of the Call for Sites. There is likely to be a new Waste Plan produced in 2016. “**

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The North London Waste Authority have wasted, by their own admission, £20 million on a failed procurement and planning process for Pinkham Way. Haringey, as partners in the Lea Opportunity Area, have identified the LOA as strategic for employment and as this area already provides a significant waste management infrastructure and opportunities for increased employment then many jobs could have been created with a sound waste plan and £20 million pounds of public money properly spent. Pinkham Way has NO strategic value to any future waste plan when properly assessed against the existing waste infrastructure in the Lea Valley. Using waste resources to regenerate an identified area of need, such as the LOA, appears a sustainable plan. Destroying a Grade 1 Sinc does not.

“There are local aspirations for this site to be used as a publically accessi-ble open space, or an eco-village. An application for the site to be consid-ered a Village Green was recently rejected.”

The erection of the fence around the site without planning permission and the required consultation, failed to consider the existence of public rights of way, established over 46 years, onto and across the site. The obstruction of a public right of way is a criminal offence.

“The site contains significant level changes, including a partially culverted water course and residual valley running across the site south-east to north-west. The adjacent railway line to the east of the site is several me-ters above on an embankment, which is a designated Ecological Corridor. Beyond the railway line is the Bounds Green Industrial Estate, another designated employment area (DEA2). “

The London Rivers Action Plan has designated the fully culveted water course to be deculveted and the site to be enhanced as follows:- Reasons for enhancement(s) Site is planned to be developed, mitigation for this development with nature conservation improvements as well as potentially providing amenity and recreational land for local population and education opportunities.

The Bounds Green Industrial Estate has a significant number of empty units. Therefore the building of further units is unsustainable.”

“The areas to the west and south of the site form a large area of Metropol-i-tan Open Land (MOL) and Site of Importance for Nature Conservation (SINC); including Hollickwood Park, a small local public park also desig-nated SINC Grade II, and Muswell Hill Golf Course, which like the site is SINC Grade I. The MOL and DEA boundaries are contiguous but are not consistent with the actual land ownership boundaries, particularly the boundary between the Pinkham Way site and Hollickwood Park.”

Pinkham Way is wooded with some 1500 trees and is a vital component in providing a natural buffer to pollution from the Railway and the A406 North Circular Rd. It also provides significant protection to flood risk from the Bounds Green Brook. The site, adjacent to the A406 is located within Zone 3b the Effective Flood Plain as identified by the Environment Agency. Haringey have failed to consult the Environment Agency with their employment designation for Pinkham Way and have failed to carry out the required Flood Risk Assessment and Sequential Test as required under the NPPF.

“To the west of the park is a residential area, some 100m from the nearest part of the site.”

Residential properties are located within 10m of the boundary of Pinkham Way.

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## Conclusions

With the huge amount of factual information that has been supplied to Haringey Planners over the past 3 years it is impossible not to view the totally inaccurate descriptions of Pinkham Way and the surrounding area as intending to deliberately mislead readers of their Call For Sites consultation. The only factual statement made is the sites integrity with the other important green spaces in the area.

Haringey's failure to carry out the many required assessments and sequential tests totally undermines any justification for continuing to designate Pinkham Way as "strategic" to Haringey's employment needs.

To continue with an employment designation for Pinkham Way we believe that Haringey must be able to answer these important questions :-

- 1) Is Pinkham Way critical to the delivery of the spatial strategy for Haringey?
- 2) What is the added value in defining Pinkham Way within the core strategy?
- 3) Would Haringey fail to meet their spatial vision if the site was not delivered in the plan period?
- 4) Which of the core strategy spatial objectives would the site help deliver?
- 5) Is Pinkham Way required to deliver national, sub regional or regional objectives?
- 6) Is Pinkham Way needed to deliver infrastructure which is central to the delivery of the plan and its objectives and can Haringey demonstrate stakeholder buy-in with sufficiently robust evidence (sources of funding, timescales for delivery, gaps in funding, contingency) to be reasonably certain that the specific infrastructure requirements of any strategic sites can be delivered?

Simon MacMull

Chairman - Freehold Community Association

24th February 2014

# MH3 - Former Friern Barnet Sewage Works - Pinkham Way

page 3 of 3