

By email to: ldf@haringey.gov.uk

LDF Team
London Borough of Haringey
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Wood Green
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13th June 2012

Dear Local Development Framework Team,

Ref: Consultation on Haringey's Local Plan: Strategic Policies (formerly Core Strategy)

The North London Waste Authority (NLWA) understands that the LB Haringey is consulting on the former Core Strategy, now the Haringey Local Plan: Strategic Policies document in the light of the publication of the NPPF and the Planning Policy for Traveller Sites and provides an officer response below. Members will review the response at the next Authority meeting on 22nd June; any further changes to this response will be submitted thereafter.

As the proposed changes outlined in the consultation documents, including the Schedule of Modifications are principally factual changes to update the document in the light of the publication of national policy and framework publications, the Authority has no specific comments upon the changes proposed. Accordingly the Authority supports the changes that are outlined in the consultation documentation – these updates are necessary to bring Haringey's Local Plan: Strategic Policies in line with national guidance.

The NLWA submitted a representation on the Core Strategy Proposed Submission in June 2010 and further wrote in support of the document in November 2011. A NLWA officer additionally attended the EiP of the then Core Strategy in March 2012. We reiterate our previous comments below:

Specifically we support the designation of the Former Friern Barnet Sewage Works as a Locally Significant Industrial Site (LSIS). The NLWA is a part owner of this site, and has submitted a planning application for the site to be used for a waste facility and vehicle depot in partnership with LB Barnet, which is currently on hold, pending the outcome of the North London Waste Plan EiP.

The site is already designated in Haringey's UDP as a Defined Employment Area (Employment Location) and changing the classification to LSIS will provide the appropriate level of protection to the long term future of this site and facilitate bringing it back into beneficial use.

The site's use as an industrial area is well established, having been previously used as a sewage treatment works (STW) and landfill site. The remnants of the STW are still visible at the northern end of the site.

We consider that the site is suitable for designation as a LSIS use for the following reasons:

- it is a brownfield site;
- it has good access to the adjacent North Circular;
- the majority of the site is in Flood Zone 1;
- beyond immediate transport corridors it is already adjacent to the Bounds Green Industrial Estate and Friern Bridge Retail Park;
- It does not have any national or international environmental, archaeological or heritage designations;
- it is a suitable size for a LSIS; and
- it is separated from residential neighbours by the north circular road and the retail park to the north, by the railway and commercial area to the east, by the golf club to the south and by Hollickwood Park to the west

Following an extensive site selection and consultation process, the site has been identified as being suitable for waste use in the North London Waste Plan (NLWP) Submission Version. The characteristics of a waste management facility are considered to strongly reflect those of many industrial activities, and the compatible allocation in the NLWP therefore serves to reinforce that the site is correctly designation in the Core Strategy.

Finally, the designation of Pinkham Way as a LSIS is also consistent with the recently adopted London Plan. Policy 4.4 requires boroughs to work with the Mayor and other partners to *"a adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London"*.

The Mayor's Industrial Capacity SPG (2008) elaborates on this policy and lists a number of criteria in paragraphs 4.11 – 4.13 which may justify the retention or release of a site in industrial use. The criteria are based on general economic and land use factors and indicators of industrial demand. In developing criteria-based policies, boroughs should seek to retain those sites in industrial use that are functionally the most important for industrial users. Pinkham Way site scores well when considered against the majority of these criteria, but in particular its designation meets the following criteria:

- meets demonstrable local strategic long term demand for industrial development and/or long term strategic demand;
- meets demand and addresses the particular needs of waste management, recycling, energy, transport and utilities and enabling waste to be managed in one of the nearest appropriate installations;
- is well located in relation to the strategic highway network or local highway network, in particular causing minimal traffic impact in residential areas;
- offers potential for 24-hour working, or provides facilities for 'bad neighbour uses' without detriment to residential amenity, being well screened from neighbouring uses, particularly residential areas;
- provides sufficient space for adequate operational parking and turning space for goods vehicles; and
- has been vacant for a considerable period (normally at least two years, and up to five years in areas of generally strong demand), without realistic prospect of industrial re-use.

Please do not hesitate to contact me should you require any further information.

Yours sincerely



David Beadle

Managing Director

