



Haringey Council

Haringey Site Allocations Development Plan Document (DPD)

Haringey Strategic Housing Land Availability Assessment

Call for Sites Form

The Council is seeking sites for inclusion within its Site Allocations DPD, and Strategic Housing Land Availability Assessment (SHLAA). Sites allocated in the Sites Allocation DPD will be incorporated into the development plan for the borough, and will help to shape the future of the borough.

At this time, the Council is seeking sites in excess of 0.25 hectares (0.62 acres) and for a range of uses, including (but not limited to):

- Sites able to make a contribution to the boroughs housing stock;
- Sites able to accommodate jobs and benefit Haringey's local economy;
- Sites needed to provide the infrastructure required to accommodate growth in the borough;
- Sites with the potential to enhance the shopping, recreation, leisure and amenity of the borough and its local areas.

The sites submitted during this consultation will be assessed by the Council, and a first draft consultation document will be released later in 2013.

If you need any further guidance with completing this form, please contact the Planning Policy Team. Please return your completed form, as well as a map with the site outline clearly identified on an Ordinance Survey base map, by 5pm on Friday 10th May 2013.

Please return your completed form by email to:

ldf@haringey.gov.uk

Or post to:

Call for Sites
Planning Policy Team
Planning Regeneration and Economy
London Borough of Haringey
Wood Green
London
N22 8HQ



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PART ONE

1. YOUR DETAILS

Name:	Tim Judson
Company/Organisation: (if applicable)	North London Waste Authority (hereafter "The Authority")
Address: (incl. postcode)	
Telephone:	
Email:	

2. DETAILS OF SITE OR BUILDING

Address: (incl. postcode)	Land at former Friern Barnet Sewage Treatment Works ("The Pinkham Way site") Pinkham Way London N11 3PW
Grid reference: (if known)	528913 191664
Site Area: (in hectares)	6.6ha
Current use(s):	Vacant land
Relevant planning history: (include application reference number if known)	Policy Context The site and surrounding areas carry a number of designations in the adopted (saved) UDP. An extract of the Haringey proposals map is shown in Figure 1 below.



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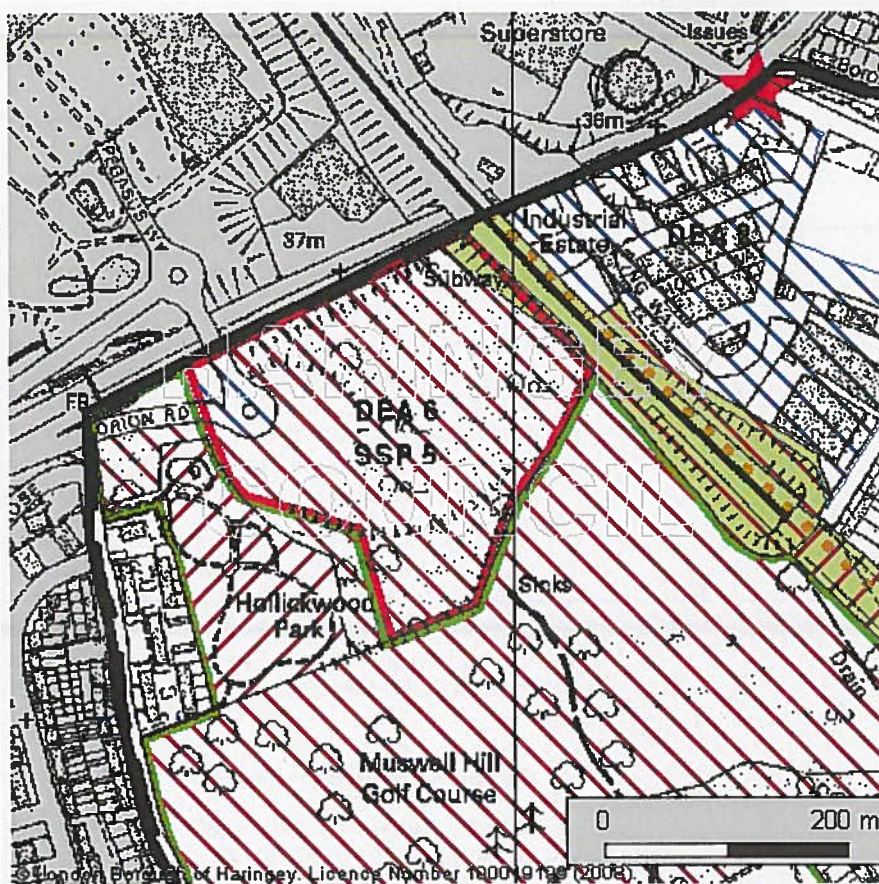


Figure 1. Extract of the Haringey proposals map, showing the Pinkham Way site

The site is a Designated Employment Area (DEA6) and an Ecologically Valuable Site (EVS9), borough Grade 1. The reference on the plan to "SSP5" is the site specific proposal for the site to have a so-called dual designation for the employment and ecological site designations mentioned above. The proposal is for "Employment generating uses subject to no adverse effect on the nature conservation value of the site."

The adjacent railway line and cutting to the east of the site forms a designated Ecological Corridor. Beyond the railway line is the Bounds Green Industrial Estate, another designated employment area (DEA2).

The areas to the west and south of the site form a large area of Metropolitan Open Land (MOL). 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. The variance at a number of points is small and the Authority believes this is largely a matter of inconsistencies between mapped and actual site boundaries. The Authority proposes that the boundaries be redrawn to remove such anomalies, which will provide a more appropriate and defensible boundary between the land to be protected and the land suitable for development. A plan showing the MOL and property boundary overlaps is included as supplementary information to this form (Pinkham Way Site Ownership MOL Plan).



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Historic and Current Uses

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. 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 which are found across the site.

At present the site is not in active use and there is no access to the public. The site is managed on behalf of the two owners, with an ongoing programme to reduce and over time to eradicate the extensive areas of the invasive plant species Japanese knotweed and Giant hogweed. Arboricultural management is also ongoing in the interests of health and safety (e.g. felling and lopping of branches and trees at risk of falling) and to maintain the health of significant trees along the outer edges of the site.

Although there has been extensive growth and colonisation by flora and fauna on the site, it is a brownfield site, i.e a previously developed site, which retains a legacy of previous uses including buried structures and foundations, landfill, flytipping and areas of invasive species. Additional commentary on the brownfield status of the site is provided s supplementary material to this form (NLWP MM4 Supplementary Note SEA Review Brownfield 2012-06-11)

Planning application history

An application for outline planning permission was lodged in May 2011. This application was made jointly by the NLWA and LB Barnet for a waste facility and waste vehicle depot. The application was never validated and has now been withdrawn.

A review of the London Borough of Haringey (LBH) online planning application register for the 'Former Friern Barnet Sewage Works' identified a total of 11 records dating between 1987 to 2000. Although no development has actually taken place since the decommissioning of the sewage treatment works, this history demonstrates that the site has long been recognised as suitable for development, with the more recent focus being on employment development.

The most recent validated application, submitted in 2000 (HGY/2000/0959) by Costco Wholesale Limited sought outline planning permission for the 'erection of a warehouse club building for the sale of goods (including use within A3) together with fitting bay, erection of industrial buildings, new access, car parking and landscaping...new access is to the North Circular from the existing roundabout'. This application was withdrawn by the applicant.

In 1998 (HGY/1998/0026) an outline planning application was submitted by London Borough of Barnet for the redevelopment of the site for residential development, to include the creation of a new access onto Alexandra Road. This application was refused by LBH.

In addition to the above records, the remaining notable planning application registered to the site address includes an outline planning application for the construction of a new road bridge over the North Circular, together with



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	<p>associated carriageway works (OLD/9999/4562). This application was granted planning permission and the works have been completed.</p> <p>Other records from 1987 to 2000 include the submission of reserved matters, conditions and requests for extensions to the time limits for planning permissions.</p> <p>Further detail on the planning history of the site is provided in the London Borough of Haringey's evidence presented at a recent Town Village Green hearing for the site:</p> <p>http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/strategicphysicalregeneration/pinkhamway/villagegreen/planning-tvg001_representations.htm</p>
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3. PROPOSED FUTURE USES

PROPOSED USE	FURTHER INFORMATION/SPECIFICATION
	Please note that the Authority's response is written on the basis of existing policy framework in place at the time of writing
Residential (C1, 2 & 3)	
Office, Research & Development, Light Industrial (B1)	<p>The site is suitable for all uses within this use class and consistent with the existing designation as a designated employment area (DEA).</p> <p>However, the Authority proposes that the characteristics of the site are such as to make a designation as a Locally Significant Industrial Site designation more appropriate.</p> <p>This issue was considered at the Examination in Public for the Haringey Local Plan: Strategic Policies (formerly the Core Strategy) in February 2012. (http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/corestrategy/core_strategy_examination.htm) The site had been put forward by LB Haringey as a Locally Significant Industrial Site (LSIS) but was not adopted by the Inspector on the basis that the evidence base was not sufficient at that time to support such a decision. The LSIS proposal was therefore not rejected based on all relevant evidence, but was instead postponed until the necessary evidence was available to support a sound allocation decision.</p> <p>The Authority considers that it is necessary and appropriate for the Council to undertake a formal review of the Pinkham Way site and any other sites put forward previously but not adopted for the LSIS designation. The evidence which was identified by the Inspector as necessary to make a sound decision should be collected as part of this Site Allocations DPD process. This should specifically include a selective update of the Employment Land Review which was carried out in 2011.</p> <p>The Authority has provided in this response substantial supporting evidence but will be happy to participate in any additional evidence gathering exercise led by the Council, including the provision of any other relevant information the Authority holds.</p> <p>The Authority considers that the site offers considerable locational advantages which make it suitable for a wide range of employment uses, including industrial land. These advantages include:</p>



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	<ul style="list-style-type: none"> • a large contiguous site with the potential for significant employment-generating uses. Such large sites without fragmented ownership or significant development constraints are very rare in the borough; • direct access onto the Transport for London Road Network (TLRN) with no risk of large vehicles using residential streets or passing sensitive uses such as schools and hospitals en route to the TLRN. • a site which is located well away from residential or other sensitive uses. The adjacent open and developed sites provide a significant buffer to ensure that the risk of nuisance impacts (e.g. noise, odour, light spill) from a well-managed and fully regulated site would be very low. <p>From an employment land perspective the Authority would also argue that the Pinkham Way site is of such strategic importance, accounting for nearly 60% of the total vacant land supply in Haringey's stock of DEAs (London Borough of Haringey, Haringey Employment Land Update February 2012), that the site should be afforded greater strategic protection and accompanying designation from an employment perspective.</p> <p>It would seem a potential missed opportunity in an employment context, particularly when we are trying to rebalance our economy towards greater production, for the borough not to further protect the potential economic benefits that a site such as Pinkham Way site can provide to the area by enhancing its existing employment designation. The Authority would also argue that it is better to use a site such as Pinkham Way for activities which need traffic access than to push such activities into sites with limited or no access to the Transport for London Road Network (TLRN). The Pinkham Way site is located adjacent to and with access onto the Transport for London Road Network (TLRN) going east-west. The majority of other DEAs in the borough do not have such access.</p>
General Industrial (B2)	Suitable for all uses within this use class. See comments above.
Warehousing (B8)	Suitable for all uses within this use class. See comments above.
Retail (A1, 2, 3, 4 & 5) Please specify	
Community Facilities (D1 & 2) Please specify	
Gypsy/Travellers Site	
Waste Facilities	<p>Suitable for this use. See comments above.</p> <p>The Authority also confirms that it intends that its parcel will be developed for waste handling and treatment facilities in accordance with the objectives of the North London Joint Waste Strategy which was adopted by the Authority and the seven constituent north London Boroughs in February 2009 and in accordance with London Plan objectives to reduce and ultimately stop the landfilling of our waste in other parts of the country and to achieve net self-sufficiency of waste treatment capacity in London by 2031.</p> <p>Waste use for the site is additionally consistent with the proposed submission version of</p>



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	<p>the North London Waste Plan (NLWP) approved by LB Haringey Cabinet on 8 February 2011; albeit that this document has not been adopted and a new NLWP is now commencing preparation following an independent planning inspector's conclusions which resulted in the cessation of the plan examination process on a legal matter.</p> <p>The Authority proposes that only its ownership parcel be designated as a waste site. The respective land ownership parcels of the Authority and the London Borough of Barnet (see below) are shown on the attached plan (Pinkham Way Site Ownership MOL Plan).</p> <p>Additional supplementary evidence on the need and suitability of the site for waste is provided in documents attached to this form.</p>
Other – please specify	<p>The Authority understands that the London Borough of Barnet intends that its parcel will be developed as an operational vehicle depot for Council waste collection vehicles, street cleansing and ancillary operations. The Authority considers that the site is suitable for this use for the reasons given above. The Authority also recognises the obvious complementarities between a municipal waste handling facility and a waste vehicle depot. Their adjacency would help to reduce overall trips for the waste collection fleet, since the "return to depot" after the final collection round would not involve a return to the public highway.</p>

4. SITE OWNERSHIP DETAILS

Are you the freehold owner of the site/building?	YES/NO
If yes, do you own the whole site?	YES/NO
Are you a leaseholder of site/building?	YES/NO
If yes, do you lease the whole site?	YES/NO
If the answer is no: Do you know who owns the site (whole or part)?	YES/NO
If yes, is the owner aware of your proposals?	YES/NO

5. MARKET INTEREST

Comments

Site is owned by a developer	
Site is under option to a developer	
Site is being marketed	
Enquiries have been received	
None of the above	<p>Part of the site is owned by Authority, which we wish to be able to use for wastes management. The other part of the site is owned by the LB Barnet and as stated above, we</p>



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	understand is intended for future development as a Council waste vehicle depot. Land ownership boundaries are shown on the site plan titled "Pinkham Way Site Ownership MOL Plan" attached with this form.		
Not Known			
6. UTILITIES	Yes	No	Unsure
Mains Water Supply			X
Mains Sewerage			X
Electrical Supply			X
Gas Supply			X
Access to Public Highway	X		
Landline telephone/Broadband			X
Public rights of way		X	
Other	X		
If other, please specify:	<p>A surface water drainage culvert runs south to north across the site. There may be other utilities dating back to the former sewage treatment works, but it is expected these will need to be renewed as part of any new development.</p> <p>The site is accessed from Orion Way, which forms a dumbbell junction over the North Circular Road. The access is currently blocked off to prevent unauthorised access. A new access would be formed off the Orion Way roundabout into the site.</p>		

7. AVAILABILITY ISSUES/ SITE CONSTRAINTS	Yes	No	Unsure
Land is in other ownership and must be acquired to develop the site		X	
Restrictive covenants exist		X	
Current use needs to be relocated		X	
Public rights of way cross or adjoin the site	X (see comment)		



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Contamination	X		
Access constraints		X	
Trees and/or mature hedges on site or on the boundary	X (see comment)		
Tree Protection Orders on site	X (see comment)		
Environmental/wildlife designations on the site E.g. Nature conservation sites, specific habitats etc	X (see comment)		
Flood risk	X (see comment)		
Pylons or overhead cables on the site		X	
Designated as Open Space		X	
Other	X		

If other, please specify:

As described above, the site overlaps at a few points with the adjacent Metropolitan Open Land (MOL). The overlap is small and the Authority believes this is largely a matter of inconsistencies between mapped and actual site boundaries. The Authority proposes that the boundaries be redrawn to remove such anomalies, which will provide a more appropriate and defensible boundary between the land to be protected and the land suitable for development. A plan showing the MOL and property boundary overlaps is included as supplementary information to this form (Pinkham Way Site Ownership MOL Plan).

Additional comments:

Public rights of way: No public rights of way are within or cross the site, but Hollickwood Park to the west is a public open space.

Trees / Tree Preservation Orders (TPOs): The site contains a number of mature trees, some of which are protected by TPOs. An arboricultural survey was carried out in 2012. A copy of the report is included as part of the supplementary information provided with this form.

Environmental/wildlife site: As described above the site is a designated Ecologically Valuable Site and carries a site specific proposal (SSP5) for "Employment generating uses subject to no adverse effect on the nature conservation value of the site." The Authority commissioned ecological surveys on the site in 2011. A summary note of the results of the study is included as part of the supplementary information provided with this form. The Authority has commissioned an additional round of ecology surveys, which are being carried out this spring and summer. The Authority will be happy to share the survey report with the Council to help inform the borough-wide Open Space survey which the Authority understands will be undertaken in 2013.

Flood risk: A small area to the north east corner of the site is in Flood Zone 2, with the rest of the site in Zone 1. In accordance with national planning guidance employment uses have a flood vulnerability



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classification of 'less vulnerable' and therefore would be appropriate in Flood Risk Zone 2 and Zone 1.

8. TIMESCALE FOR AVAILABILITY

0 – 12 Months	The site is currently available for development. However, no planning application is currently in preparation. As explained by the Authority on 25 April 2013 (see: http://www.nlwa.gov.uk/news/newsdetail/2013/04/25/nlwa-withdraws-planning-application-for-pinkham-way-site) whilst new mechanical and biological waste treatment (MBT) facilities at both the Authority's Pinkham Way and Edmonton sites had originally been proposed, it now seems likely that plans for MBT facilities will be taken forward at only one site. Subject to a successful planning application for new facilities at Edmonton, it is likely that plans for MBT facilities at Pinkham Way will not need to be taken forward, but this will become clearer in due course.
1 – 5 Years	
5 – 10 Years	
10 – 15 Years	
Beyond 15 Years	

If the site is **NOT** available in the next 12 months, please tell us why:

5. OTHER RELEVANT INFORMATION



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Please use this space for additional information or further explanation on any of the topics covered in this form.

The Authority owns part of the site referred to as the 'former Friern Barnet Sewage Works' at Pinkham Way, on which it plans to build additional waste facilities to serve the north London area, thereby assisting in meeting London Plan targets which aim to manage 100% of London's waste within the capital by 2031 and supporting the delivery of the North London Joint Waste Strategy target of 50% recycling and composting by 2020. The site is centrally located within the north of the Authority's area with direct access onto the Transport for London Road Network (TLRN). The central location of the site within the NLWA seven-borough area also means that it provides potential benefits to reduce the cost and environmental impact of road transport by reducing the need for collection vehicles to travel to more distant sites. This site is therefore of strategic importance to both the Authority and the London Borough of Haringey in that the Authority would like to use this site for managing a proportion of north London's waste, including material from Haringey. The Authority's plans for the site would accordingly assist in meeting both NLWA and London Borough of Haringey ambitions in respect of wastes management.

The NLWA acquired its parcel within the site in 2009 from the London Borough of Barnet. Since that time no development activities have occurred but extensive site surveys have been undertaken, and the site has been managed to ensure public safety (e.g. by felling/lopping dangerous trees and maintaining a secure boundary fence which is to additionally prevent the continuation of fly-tipping evident at the site) and to eradicate over time the widespread extent of the invasive species Japanese Knotweed and Giant Hogweed.

The following text summarises key points in addition to that provided above:

Ecologically Valuable Site (EVS) Designation

The Authority recognises that the site has some nature conservation value as a legacy of the years of inactivity on the site. Nevertheless, the Authority believes that the evidence for the current EVS designation is out-of-date and that an updated assessment should be carried out to determine the present nature conservation value of the site. The Haringey Local Plan Strategic Policies Inspector's Report to the Council which is available at http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/corestrategy/core_strategy_examination/cs-document-library/post_examination_documents.htm#letter-tab-mods-insp-to-lbh-220812

also supports this view: "The balance of the available evidence at this time, which includes the restricted public access, does not indicate that the site would warrant a sole designation as a Local Nature Reserve or as Metropolitan Open Land (MOL) over and above the UDP allocation as a LEA. Nonetheless, the Sites Allocation DPD would provide an opportunity to review its status."

For instance, several uncommon plants including bee orchid *Ophrys apifera* and the nationally-scarce golden dock *Rumex maritimus* have been recorded here in the past (this was recorded on London Wildweb and by the Greenspace Information for Greater London CIC). However, site surveys undertaken in May 2009 and June 2010, found no plants of either species.

In addition, the site has many stands of Japanese knotweed, *Fallopia japonica*. These vary greatly in size from 0.25m² to over 150m² with the larger stands concentrated in the central and northern areas of the site. Giant hogweed *Heracleum mantegazzianum* is also prevalent on the site.

Together these and other findings from the ecological surveys indicate that the value of the site should be re-evaluated to ensure the designation is appropriate and future planning decisions are based on sound evidence.

For further information on ecology matters, we enclose the "Technical Note NLWA Hearing Statement Main Matter 4 Appendix Environmental Baseline Information for Pinkham Way" which was provided for the North London Waste Plan examination in public hearing in June 2012 and which provides a recent baseline position of the environmental status of the site. We also attach an ecological summary prepared ARUP entitled 'Statement 4 Ecology Surveys' for information and Appendix 3 to the Authority's Hearing



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Statement entitled 'North London Waste Plan Examination, 13/14/19/20 June 2012, Main Matter 4: Sites, North London Waste Authority Hearing Statement' see page 20 paragraph 46.

Town / Village Green Application

The site is the subject of an application to register the site as a Town or Village Green. This application is currently being assessed by an independent assessor following a public hearing, and on receipt of the assessor's report the application will then be determined by the London Borough of Haringey as the Commons Registration Authority. As all the relevant information in this regard is already held by the London Borough of Haringey the Authority has not included any of the information provided jointly on that matter with the London Borough of Barnet, nor has the Authority repeated LB Haringey's own representations that it made.

Brownfield status

The Brownfield site status of the site has been challenged in previous planning fora, most recently in the material prepared for the North London Waste Plan examination in public (EIP). Although the EIP was closed without the majority of matters being considered, the hearing statements prepared by all parties raised issues which are highly relevant to the future consideration of the Pinkham Way site. The Authority is of the view that the Pinkham Way site should be considered as a brownfield site. The site was 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.

Although the Council does not retain a central list of sites in the borough with previous uses and planning history associated with each site, a search of the Environment Agency website's "What's in my backyard?" section for 'historic landfills' shows the site as 'historic landfill'.

The site is listed as 'Friern Barnet Sewage works' and as having first received waste on 31st December 1940 and having last received waste on 31st December 1980. The site is shown as having accepted 'Waste which remains largely unaltered once buried such as glass, concrete, bricks, tiles, soil and stones.'

In Haringey's Contaminated Land Strategy, 2004, Table 13, which lists land used for public utilities 1970, describes the site as 24 acres, north of Muswell Hill Golf Club 'partly landfilled with refuse'.

The Contaminated Land Strategy notes that 'A number of brownfield sites in the borough have been identified in the Unitary Development Plan (UDP) as opportunity development areas. Some are situated on land known to be contaminated; sites which are expected to be developed in the next three years are detailed below.' These are listed in table 2 and include the 'Former Friern Barnet Sewage Works, Pinkham Way'.

In preparation for the NLWP EIP the Authority also noted that the NLWP Technical Report specifically includes (see para 3.5) that the National Land Use Database of Previously Developed Land (2006) was one of the sources of information used to establish a long list of potential waste sites for the NLWP. Paragraph 3.6 of the report notes that:

"This database provides information of Previously Developed Land and Buildings in England that may be available for development, whether vacant, derelict or still in productive use. It provided the main source for preparation of the long list of sites in north London which was assessed during the Plan's production."

Further detail is included in the Preferred Options Technical Report paragraph 2.12; Appendix 2 of the same report contains the full list. The Pinkham Way site is included in the long list (site 121)



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We attach to these representations a supplementary note on the brownfield status of the Pinkham Way site prepared by ARUP which summarises how brownfield / previously developed land (PDL) was addressed in the North London Waste Plan (NLWP) Technical Report and Sustainability Appraisal (SA). It also collates the record in relation to the Pinkham Way site. See 'NLWP Main Matter 4 Supplementary Note SEA Review brownfield 12-06-11'

Potential Waste Use/Need for new sites for waste facilities

The Pinkham Way site was included in the North London Waste Plan (NLWP) Proposed Submission Version. This document has now been withdrawn and a new NLWP is now commencing preparation. The NLWA understands that the criteria for selection of sites and additionally the designation of the Pinkham Way site as a waste site is a matter for the NLWP, but where the evidence to support the case for the site being allocated as a waste site is relevant to the consideration of the site as a DEA or as preferred an LSIS, such evidence is made available to the London Borough of Haringey in attachments here.

Considerable evidence is available to demonstrate the need for additional land for waste facilities to provide capacity to meet Haringey's and indeed all seven north London boroughs' rising apportionment under the London Plan to support the Mayor's commitment to achieve net self-sufficiency in London by 2031. A number of the supporting documents attached confirm the need argument for new waste sites. The Authority still considers that the Pinkham Way site is suitable to be put forward for inclusion in the replacement NLWP. In preparation for the NLWP EIP the Authority submitted a Hearing Statement for Main Matter 2 'Need' which included Table 9 a 'Summary of MSW and C&I waste treatment need and capacity' (see NLWA Hearing Statement Matter 2/134 Table 9. Summary of MSW and C&I waste treatment need and capacity)

In table 9 the NLWA re-presented the balance of need with capacity for waste treatment sites in north London. The NLWA proposed that its version was more understandable because it did not present the delivery of 900,000 tonnes of capacity by the NLWA as external to the process of identifying sites.

Finally the Greater London Authority's representations to the North London Waste Plan Proposed Submission Version as recorded in the 'Schedule of the representations received on the Proposed Submission Version of the North London Waste Plan, 2012', available at http://www.nlwp.net/documents/2012_examination.html support the use of the Pinkham Way site for waste management "The principle of the use of this site for a waste use is accepte(d)" (see page 328, representer number 298 - Greater London Authority)

Supporting documents for the site's waste use:

NLWA Hearing Statement Main Matter 2 Need FINAL 2012-05-15 (Note that Table 9 of this statement is NLWA's assessment of capacity rather than part of a statement of common ground with the local councils).

Errata Issued 17-05-12)

NLWA Hearing Statement Main Matter 3 Spatial Strategy FINAL 2012-05-15

NLWA Hearing Statement Main Matter 4 Sites FINAL 2012-05-15

Industrial Use

In respect of the argument for a LSIS designation for the site, the Authority's response to the LB Haringey's consultation of Haringey's Local Plan: Strategic Policies (formerly Core Strategy), June 2012



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Authority officers commented that:

"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 very 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"

The GLA's support for the site's use for waste management purposes as referenced above is also relevant in this regard.

Additionally, the Authority notes that the site meets a number of the criteria included in the Mayor's Industrial Capacity SPG (2008) in paragraphs 4.11 – 4.13 which may justify the retention or release of a site in industrial use. The site at Pinkham Way scores well against the majority of these criteria, but in particular the Authority would consider that 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.

Further evidence in support of this designation includes Haringey's own 'Responses to Matters' raised at the Haringey Local Plan: Strategic Policies (formerly Core Strategy) hearing in February 2012 as attached.

The Authority recognises that the planning inspector who assessed the Local Plan: Strategic Policies (formerly Core Strategy) in public concluded that Haringey's approach to altering the status of some of its Designated Employment Areas (DEAs) to LSIS (Locally Significant Industrial Site) status was not appropriate for the Strategic Policies stage. It is, however, wholly appropriate for this Site Allocations stage. In order to ensure that the evidence base is robust, the Authority proposes that the Council to undertake a formal review of the Pinkham Way site and any others sites put forward previously but not adopted for the LSIS designation. The evidence which was identified by the Inspector as necessary to



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make a sound decision should be collected as part of this Site Allocations DPD process (see below). This should specifically include a selective update of the Employment Land Review which was carried out in 2011.

As all the relevant information in this regard is already held by the London Borough of Haringey the NLWA believes that it is not necessary to submit any information in relation to that application. However, the relevant text from the Inspector's report is reproduced below:

Report to Haringey Borough Council by Andrew Seam BA (Hons) MA MRTPI an Inspector appointed by the Secretary of State for Communities and Local Government, Planning and Compulsory Purchase Act 2004 (as amended Section 20) Report on the Examination into Haringey Local Plan: Strategic Policies Development Plan Document, Document submitted for examination on 28 March 2011 Examination hearings held between 28 June 2011 and 7 July 2011 additional hearing held 22 February 2012.

"56. The Employment Study update (2012) makes some further references to the Mayor's original SPG criteria but the extent to which the assessments of DEA sites contained in Section 7 have been undertaken with the key criteria in mind is unclear and neither methodical nor comprehensive, even with regard to the 'Raw Data – Survey Tables' information supplied by the Council. This does not represent a comprehensive or robust evidence base for the DEAs of the Borough as shown by the Schedule of Focussed Changes. This remains the case even when considered in association with some of the descriptors of DEA2 and 6 within Doc Ref CSSD-03a and a desire to protect against retail uses carries little weight in justifying LSIS designation given the extant policy position of the development plan. In the absence of any persuasive evidence that the criteria of the Mayor's SPG have been applied thoroughly and comprehensively to the DEAs of Haringey, there is no sound analytical basis for creating new LSIS at this time.

57. The evidence indicates that there is an adequate supply of employment land for the short term and there is no substantive evidence to indicate any DEA is under imminent threat from alternative non-B class or non-conforming uses. As necessary, the Council's intended Sites Allocation DPD would provide a suitable opportunity to robustly assess the DEAs of the Borough and to alter their specific designation if warranted to ensure the objectives behind SP8 are secured. This would accord with the thrust of the NPPF to secure regular reviews of site allocations.

58. With due regard to the evidence and the justification provided in relation to employment land, I therefore recommend the necessary main modification to discount the unjustified Schedule of Focussed Changes as they relate to alterations of the Borough's DEAs at the level of LSIS and below in the employment land hierarchy (MM28)."

Finally, we note that the Council's Development Management Policies Consultation Document (March 2013) states under its proposed policy DM1 Employment and Business Uses that the aim of the policy is to "protect the borough's employment land and to meet the employment land forecast of 137,000m² additional floorspace set out in the Local Plan." Meeting this target is an essential part of the Council's strategy to reduce unemployment in the borough and to improve the lives and livelihoods of communities across the borough.

Meeting this target relies upon the availability of suitable land. As set out in this statement, the Pinkham Way site is both available and highly suitable for industrial and other employment uses (including waste uses). As such, designation as a Locally Significant Industrial Site (LSIS) would ensure the site is appropriately protected from other uses which would result in a failure to meet the employment land target.

Other documents attached:

Haringey Council Core Strategy Examination, Hearing Session 8, 22nd February 2012, 2b Employment Land. DEA6 Pinkham Way. (viii –xxii)

Haringey Council Core Strategy Examination, Hearing Session 8, 22nd February 2012, 2b Employment



Haringey Council

Land

Please tick here if you wish to be kept informed of the progress of the Sites Allocation document and any other LDF documents.

☒ X

Signature

Date 10/05/2013



Haringey Council

Please return your completed form and map(s) by 10th May 2013 to:

Call for Sites
Planning Policy Team
Planning Regeneration and Economy
London Borough of Haringey
Wood Green
London
N22 8HQ

Email: ldf@haringey.gov.uk

