

Dear Sule and Ian,

HARINGEY COUNCIL CALL FOR SITES – SUSTAINABLE PROPOSALS FOR THE PINKHAM WAY SITE AND THE COUNCIL’S SITE ASSESSMENT

I should be very grateful if you would be kind enough to accept this late submission in response to the Council’s recent Call for Sites consultation.

We would like you to consider whether these proposals are more appropriate uses for the Pinkham Way site than employment uses. We would also like you to take these comments into account when reviewing the Pinkham Way site designations.

I apologise for the delay, but it has taken a little longer to respond than we expected, as we needed to consult with the local community through their representatives before putting these proposals forward. They are being put forward in good faith and in the hope you will find them helpful.

We have prepared three alternative Options for potential use of the site which are attached. We believe these options would assist the Council to achieve some of its key targets for policies SP2, SP4, SP13 and SP16. For reasons identified below, we do not consider that Policy SP8 is deliverable on the Pinkham Way site.

The Pinkham Way site currently has a dual designation of SINC No 1 and Local Employment Area. We would propose that, when reviewing this site, the Council considers removing the LEA designation because of the unsuitability of the site for employment uses.

During the Examination in Public hearing into the Local Plan in 2012, the Inspector, Mr Andrew Seaman, found that there was no evidence that the site was a well established industrial area and subsequently refused to permit the re-designation of the site as LSIS. While he permitted the dual designation of LEA/SINC to remain, he qualified the permission very clearly, in his recommendation that the site’s designations be reviewed, by adding “In the interim, the continuation of the UDP LEA designation for the site, in conjunction with recognition of its nature conservation value, is warranted”.¹

There has not been employment use or any other use on this site for over 50 years, apart from some municipal dumping and sporadic landfill which finished in 1980, and informal recreation by local inhabitants which ended when the owners fenced the site. The site is currently an open green space with high nature conservation value. The value

¹ para 62 Planning Inspector’s Report on EiP into Haringey Local Plan: Strategic Policies (PINS/Y5420/429/4)

of its biodiversity has increased through the lack of use since the site was originally designated Employment Land.

The site should no longer be classified as PDL because it falls within the exception to this definition given in both the London Plan and the NPPF². We have attached an analysis of the definition and the exceptions to it to support this view. If you are not minded to agree with our conclusions, we would appreciate knowing the reasons why. We consider it important that the Council clarifies this point.

The site lies within the Alexandra Ward. Alexandra Ward is one of the wards within the Muswell Hill Area Neighbourhood³. The Council has identified the policies that take priority in this neighbourhood as, Design, Town Centres, Open Space and Biodiversity; Community Facilities and Housing⁴. We note that Employment is not identified as a priority policy in this location.

The Council acknowledges that unemployment in this area is well below the borough average⁵. Although part of the neighbourhood is reasonably well served by buses, this particular site is shown as being badly provided for by public transport making it difficult to access. It is scored as 'Poor', the lowest possible level of scoring.⁶

The nearest station is over 900m from the site boundary and only one bus route operates within 460m of the site. The Council has been advised that sustainable modes of transport should be a key consideration with any major regeneration of a DEA site.⁷ We believe this lack of public transport is a major obstacle to employment use of any significance on this site.

Working towards a low carbon borough is now a key challenge for the Council – indeed Haringey has taken the initiative in setting itself targets in this area with its own 40:20 Carbon commission Report - and policy SP4 requires the efficient use of land and buildings in order to reduce car dependency.⁸ Because of the deficiency in public transport, an employment use on this site is likely to encourage car use contrary to this policy.

The Council's overall strategy for managing future growth in Haringey is to steer new development with high transport demand to areas with significant redevelopment opportunities at, or near, transport hubs in order to support non-car use.

² Pages 297 and 306 of the London Plan (20 11) and Annex 2 of NPPF

³ Fig 1.10 page 27 Local Plan – Strategic Policies 2013

⁴ 1.3.64 p26 Local Plan – Strategic Policies 2013

⁵ 1.3.57 p26 Local Plan – Strategic Policies 2013

⁶ Fig 3 page 85 Local Plan – Strategic Policies 2013

⁷ p22 (Point No 11) of The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement

⁸ 4.1.6 p71 Local Plan – Strategic Policies 2013

The key growth areas identified in the Local Plan are Haringey Heartlands and Tottenham Hale. It is in these areas that the most significant amount of houses, jobs and infrastructure will be delivered during the life of the Plan.⁹

The Council states it will not permit development on SINC's unless there are exceptional circumstances and the importance of the development outweighs the nature conservation value of the site and in such circumstances appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided.¹⁰

It is difficult to see how any significant employment use on the site could be implemented without having a major adverse impact on the nature conservation value of the site itself and on the adjoining open spaces. The employment policy is seen as one of the policies in the plan "to have the most potential for negative impacts mainly related to environmental objectives"¹¹

Monitoring the Plan is intended to identify adverse effects of various policies so that remedial action can be taken, but logically, this will be only after the damage has been done. In the case of a valuable SINC that has developed its biodiversity value over 50 years, the likelihood is that the damage would be irreparable, through damage, for example, to mature or semi-mature woodland or destruction of rare species.

The site forms part of an ecological chain from Alexandra Palace through Rhodes Avenue Spinney, Albert Road recreation, Tunnel Gardens and thence to Coppetts Wood. Furthermore, there is an opportunity to deculvert the watercourse which runs beneath it.

This watercourse is highlighted in the London Rivers Action Plan as one to be deculverted.¹² The Council's policy SP5 requires all development to deculvert wherever feasible.¹³ The London Plan requires protection of London's network of green infrastructure.¹⁴

The site is bounded on two sides by adjacent open space, Hollickwood Park and Muswell Hill Golf Course, both recognized as important green spaces in their own right. Because of this particular juxtaposition, the sites gain additional value from each other. Atkins advised Haringey in December 2010 that "Strategic landscape and open space resources should be maintained enhanced and, where possible, linked."¹⁵ The Council has stated that development will not be permitted on designated and other open spaces and on

⁹ Paras 2.1.4 and 3.1.6 of The Local Plan – Strategic Policies 2013

¹⁰ 6.3.24 Local Plan – Strategic Policies 2013

¹¹ Page 25 The Strategic and Environmental Assessment and Sustainability Appraisal – Post Adoption Statement

¹² Appendix 3 Memo from Haringey Project Officer (Nature Conservation) 9 March 2011

¹³ SP5 page 77 Local Plan – Strategic Policies 2013

¹⁴ London Plan Policy 2.18 p70

¹⁵ Appendix 4 Extract p4 Haringey Atkins LIP Strategic Environmental Assessment 2010

suitable land with the potential to be used as open space unless it is for limited small scale development ancillary to an existing use on the land and for which there is demonstrable need.¹⁶

The Mayor recognizes the current and potential value of open space to London communities, and requires London boroughs to protect local open space and address local open space deficiencies.¹⁷ The first White Paper on the natural environment for over 20 years was published in April 2012. Introducing the White Paper, The Secretary of State said “by properly valuing nature today, we can safeguard the natural areas that we all cherish and from which we derive vital services this White Paper aims to strengthen connections between people and nature, to the benefit of both”¹⁸ There is clearly growing awareness of the importance of protecting our biodiversity and open spaces.

We believe Options 1 and 2 are in conformity with Policies SP13 Biodiversity and that they would assist in achieving the following targets in the Local Plan: ¹⁹

SP13 a; no loss of any areas of open space;
SP13 b; no loss of the 60 SINCS in the borough and
SP13 d; enhance areas of identified open space deficiency.

By creating a cycle path/walkway to the Pinkham Way site from the top of Cline Road, and/or Blake Road, along the railway land, access could be provided to the Pinkham Way site from the Bounds Green area shown as deficient in open space (280m).²⁰ The cycle path/walkway would also provide access through the Pinkham Way site and over the bridge giving access to the Retail Park on the other side of the NCR. This would also open access from the Bounds Green Industrial estate to the Retail Park and vice versa for residents and businesses on the retail park side of the NCR. There is sufficient land along the side of the railway to create a comfortable path and it is possible to access the railway land from Cline Road or from Blake Road via Tunnel Gardens.

Option 3 is in conformity with Policies SP2 Housing, SP4 Towards a low Carbon Haringey and partly conforms with SP13 Biodiversity. It would assist in achieving targets
SP2 a; meet the annual target of 820 housing units;
SP2 f; meet the percentage mix of dwelling units for private and affordable housing and
SP2 h; 10% of new residential development to be wheelchair accessible;
SP4 a; all new residential development to achieve a minimum 44% reduction in total (regulated) CO₂
SP13 d; enhance areas of identified open space deficiency

¹⁶ 6.3.3 page 199 Local Plan – Strategic Policies 2013

¹⁷ London Plan Policy 7.18 p233

¹⁸ The Natural Choice <http://www.defra.gov.uk/environment/natural/whitepaper/>

¹⁹ Appendix 3 page 171 Local Plan – Strategic Policies 2013

²⁰ Page 126 Fig 6.4 Local Plan – Strategic Policies 2013

We would like your reassurance that the Council will ensure that its instructions to the consultant/person appointed to carry out the Pinkham Way site review should emphasise the need to take into account the Inspector's comments in his Report, when he says that the considerations he expected to be taken into account were.... *considerations of its open space value, its biodiversity and its specific site features such as the culverted water course*"²¹. We would like further reassurance that both your instructions and the Consultant's report will be made available for public view.

We have recently commissioned an independent Ecological Report on the Pinkham Way site and so far there has been one visit to the site. A second visit is required (arranged for July 12th) before a final report can be produced, but we would like to advise you that the first visit resulted in the ecological consultant's finding over 100 species on the site. His view is that the site is a good Borough SINC No 1. We have agreed to let the Council have a copy of the final report which is expected later in the summer. The consultant has also advised PWA to arrange a bat survey, which we are in the process of commissioning. We will keep the Council advised on this.

We would raise one additional point about paragraph 5.1.22 of the Local Plan. This states that the Mayor's SPG for Industry and Transport urges boroughs to make employment land available for transport functions, such as rail freight facilities, bus garages and waste management facilities.

The London Plan does not identify employment land as suitable for waste use. There has been a policy shift between the 2008 and 2011 versions of the London Plan as to the category of land recommended for waste uses.

The London Plan 2011 has now been adopted and it differs in the category of site identified as suitable for waste use from the previous London Plan.

The London Plan (2008) policy 4A.27 stated that local DPDs should identify adequate provision for the scale of waste, and gave the following broad locations:

- Strategic Industrial Locations (Preferred Industrial Locations and Industrial Business Parks)
- Local Employment Areas, and
- Existing Waste Management Sites.

This list has been changed in the adopted London Plan 2011; it no longer cites Local Employment Areas and has dropped the category. Instead, Policy 5.17G of the London Plan directs Boroughs to bring forward land for waste management as follows:

²¹ para 62 Planning Inspector's Report on EIP into Haringey Local Plan: Strategic Policies (PINS/Y5420/429/4)

5.17 G Land to manage borough waste apportionments should be brought forward through:

- a protecting and facilitating the maximum use of existing waste sites, particularly waste transfer facilities and landfill sites
- b identifying sites in strategic industrial locations (see Policy 2.17)
- c identifying sites in locally significant employment areas (see Policy 4.4)
- d safeguarding wharves (in accordance with policy 7.26) with an existing or future potential for waste management.

Policy 2.17 of the London Plan refers only to Strategic Industrial Locations (SILs). Policy 4.4 refers to Strategic Industrial Locations, Locally Significant Industrial Sites (LSIS) and other industrial land. The context of Policy 4.4 is that of managing industrial land for various uses. It is clear from reading the policy on waste that the Mayor considers SILs as preferable for waste use, with LSISs as a backstop.

The SPG reference to Policy 5.17 G - see below - is inaccurate, when it states

“Policy 5.17G of the London Plan identifies broad locations suitable for recycling and waste treatment facilities including SILs (both Preferred Industrial Locations and Industrial Business Parks), ***local employment areas*** (including Locally Significant Industrial Sites), existing waste management sites and safeguarded wharves with an existing or future potential for waste management.”²² (our emphasis)

It is noted that there is no mention at all in the London Plan or in the SPG about SINCS being suitable locations for waste or other industrial uses.

Yours sincerely,

Stephen Brice
Chair – Pinkham Way Alliance.

June 17th 2013

²² Page 60 para 6.4 SPG Land for Industry and Transport September 2012