

**LONDON BOROUGH OF HARINGEY
CORE STRATEGY**

**CONSULTATION CONCERNING
NATIONAL PLANNING POLICY FRAMEWORK**

**SUBMISSION FROM THE
PINKHAM WAY ALLIANCE**

May 31st 2012

The Requirement to be ‘Genuinely Plan-Led’ - [Section 17](#)

PWA has contended, in all three submissions to the Core Strategy, that the attempt to redesignate the former Friern Barnet Sewage Works site – hereinafter called Pinkham Way – as a Locally Significant Industrial Site was driven, not by planning considerations, but wholly by the NLWA’s plan to build a waste treatment plant there, and the consequent need, in the NLWA’s eyes, to place the site’s designation squarely within the Mayor’s hierarchy of sites suitable for waste management. In other words, the attempt was simply not ‘plan-led’

PWA considers that the first bullet point of Section 17 could not underline the unsound basis of the Council’s proposal more clearly.

With regard to the second bullet point of the same section, PWA ventures to suggest that the only ‘creative exercise’ it has seen is the Council’s attempt to find a way to redesignate the site as LSIL.

Brownfield/Previously Developed Land

In its Feb 8th submission to the Haringey Core Strategy, PWA highlighted the exclusions in the definitions of brownfield/ previously developed land (pdl) in the Glossary of the London Plan 2011 (pp 297&306), and submitted that Pinkham Way fell squarely into both exclusions.

PWA notes that the exclusion for pdl has been carried over into the NPPF Glossary – [page 55](#). It also notes that the pdl exclusion is backed up by what might be seen as a hierarchy of

brownfield land, which first encourages the re-use of land of lesser environmental value – [Section 7](#) – while avoiding the use of brownfield land of high environmental value – [Section 8](#).

PWA considers that the exclusion and sections 7 and 8 reinforce its previous contention, and notes the comments made by Greg Clark, MP, Minister of State for Communities and Local Government, who has been responsible for the new framework, when speaking to the British Property Federation in September 2011:

“We want to capture a definition that makes sure we have an obligation on authorities to bring forward any sites of the lowest environmental values”.

PWA notes that the Minister did not say ‘lower environmental values’, but ‘lowest’.

Open Space

PWA underlined, in both its submissions for the CS hearing in February, the designation of the site as Open Space in the Atkins Open Space and Sports Assessment 2003. It also pointed out that Haringey as a borough was deficient in open space, and believes that the Pinkham Way site is a) definitely not surplus to requirements and b) that there would be no prospect of replacing it with ‘equivalent or better’ provision elsewhere in the borough - [Section 74](#)

PWA draws the Inspector’s further attention to the London Borough of Barnet Core Strategy maps (Green Spaces and Open Space Deficiency) - attached as Appendix 1 - which show the site as Open Space, indicating that Barnet Council too feels that the site fulfils a local need.

Muswell Hill golf course and the Pinkham Way site act as a significant barrier to pedestrian connectivity in the wider area. The present situation would seem to offer Haringey and Barnet an ideal opportunity for cross-borough co-operation in planning a through route from Durnsford Road through both sections of Tunnel Gardens - PWA is aware that there are some informal discussions about restoring Tunnel Gardens to its former openness - along the railway embankment, where there is ample space for a cycling/walking track along the border with the site, and subsequently across the A406 towards the land to the west of the Retail Park, and Coppetts Wood. This would increase access to green space and reduce car based trips, in particular to the retail park.

As well as involving the principle of co-operation, the Councils would have to plan jointly with a third party in Network Rail. In PWA’s view, the idea would be welcomed overwhelmingly by thousands of local residents, and would fulfil to the letter one of the Core Planning Principles in [Section 17](#), that planning should be ***“a creative exercise in finding ways to enhance and improve the places in which people live their lives”***, as envisaged in the second bullet point.

Environmental considerations and Biodiversity

PWA notes the emphasis in the NPPF on preserving and enhancing the environment, for example in [Section 114](#):

“LPAs should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”

and, in particular, the important acknowledgement, both in the above section and elsewhere, that sites of ecological value should be assessed, not only in their own right, but as part of a complex whose integrity and continuity would be disproportionately harmed by the loss of any one link. The Council has already acknowledged the site’s value; PWA brings the Inspector’s attention again to the e-mail from Ian Holt, Haringey’s Project Officer(Conservation) to Sule Nisancioglu of March 9th 2011, quoted in its submission of February 8th 2012 and elsewhere:

”In general the site is an important part of a larger ecological complex and corridor including other SINCs (Hollickwood Park, Muswell Hill Golf Course, Tunnel Gardens and Bluebell Wood, Albert Rd Rec and Rhodes Avenue Spinney”

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”Planning policies and decisions should be based on up-to date information about the natural environment..... Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks”

and b) in the light of Pinkham Way’s important position as a bridge into the adjoining Borough and a link in the chain up to Coppetts Wood, [Section 117](#):

“To minimise impacts on biodiversity and geodiversity, planning policies should..plan for biodiversity at a landscape-scale across local authority boundaries”

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This supine attitude diminishes Haringey's generally admirable environmental record. The NPPF has supplied the Council with numerous positive guidelines which would greatly strengthen the environmental protection for the Pinkham Way site. Yet the Council has actually chosen to weaken it, for no sound Borough reason, but instead, it appears, to facilitate development plans on the site by the NLWA. Ever since Haringey's 'compliance with pre-application discussions' the conflict between the Council's duties as a LPA and its interests as an NLWA member has been all too evident. PWA finds the Council's policy, in the face of so many recommendations within the NPPF to take the opposite course, wholly unsound. The Council should be ashamed.

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For the above reasons PWA contends that the Council's Core Strategy - insofar as it concerns Pinkham Way, its present designation as DEA and proposed redesignation as LSIL - is unsound and unjustified. PWA requests that both designations are removed from the site, as they are not compatible with the NPPF, nor are they compatible with the Grade 1 SINC designation. PWA respectfully make the further request that the Pinkham Way site is removed from SP8 of the Submitted Core Strategy.

May 31st 2012