

TO DARE IS TO DO

Stephen Kelly
Assistant Director for Planning
Haringey Council
River Park House
225 High Road
London N22 8HQ

26th February 2016



By email

Dear Stephen

44 White Hart Lane and Waste Site Protection Status

As agreed at our meeting on 8th February 2016, I am writing to set out the position in respect of the former waste operator of this site and the associated waste licences and on the basis of that information, to seek an officer level view on the application of relevant planning policy.

The information in this letter has been compiled with the kind assistance of Ross Bigley who is Environment Officer for the Waste East Team, Hertfordshire & North London at the Environment Agency (copied).

Planning Policy Context

The site (also known as the Goods Yard Site) extends to 1.02ha and lies within the proposed 11.8ha High Road West (ST5) allocation within the emerging Tottenham Area Action Plan (AAP). The proposed allocation seeks:

“Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential-led mixed-use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.”

One of the ‘Development Guidelines for the proposed allocation notes (presumably in relation to 44 White Hart Lane), notes that:

“Part of the site has a licensed waste capacity, and this will need to be re-provided before development of this section of the site can commence in line with Policy SA4.”

Policy SA4 (Safeguarded Waste Sites) resides in the emerging Site Allocations DPD and states:

“The waste sites identified in the schedule below, will be safeguarded for waste until alternative provision has been made.”

The corresponding Table 2 identifies 44 White Hart Lane as a 1.1ha site and its current use as being “A19: Metal Recycling Site (Vehicle Dismantler)” with a licensed waste capacity of 74,999 tonnes per annum.

Policy 5.17 (Waste Capacity) of the London Plan (March 2015) sets out that the Mayor supports the need to increase waste processing capacity in London. Part H of the policy states:

“If, for any reason, an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.”

On 12th February 2016 Haringey Council granted a three year planning permission for the “Erection for a temporary period of, together with use as, a construction compound.” (LPA Ref: HGY/2016/3002). The application was referred to the Mayor of London as a PSI, but the Mayor did not require the application to be referred back to him following the resolution of Planning Sub Committee.

Operation and Waste Licences

The site was until recently occupied and operated by Redcorn Limited, which is an ‘end of life’ nuisance vehicle contractor and breaker. The company holds contracts with 26 local authorities in the London area and now processes up to 50,000 vehicles per annum.

In August 2015 Redcorn surrendered its lease of the 44 White Hart Lane site and transferred its entire Tottenham operation to a site at Brantwood Road, which is also within the Council’s administrative boundary. Inevitably, such operations cannot relocate overnight and Redcorn had been in the process of transferring its operation to the Brantwood Road Site over a number of years before the formal surrender of its lease at 44 White Hart Lane.

Redcorn had operated from the 44 White Hart Lane site pursuant to the following licences:

Licence Type	Licence Date	Licence Number	Licensed Capacity	Commentary
Waste Disposal Licence	22/05/1996	T/NE/0462982	100 tonnes per week	Became WML80343.
Waste Management Licence	10/01/2005	WML80607	2,400 vehicles per year	Discrepancy between 1.2.2 (2,400 vehicles per year and Table 1.2 (24,000 vehicles per year, which is incorrect).
Waste Management Licence (Mod)	07/11/2008	WML80607	2,400 vehicles per year	No change in type of throughput of waste.
Waste Management Licence	22/05/1996	WML80343	100 tonnes per week	Formerly WDL T/NE/0462982.
Waste Management Licence (Mod)	07/11/2008	WML80343	100 tonnes per week	No change in type of throughput of waste.

Since the Environmental Permitting Regulations (England & Wales) 2010 came into force all licences, permits and the like have been known as Environmental Permits.

On 21st January 2016, Redcorn submitted applications to surrender Waste Management Licences WML80607 and WML80343. Those applications are currently being processed by the Environment Agency who have already undertaken one site visit and expect to issue their decision within the statutory 13 week time limit, i.e. by early April 2016.

The permitted capacity for 44 White Hart Lane from May 1996 (when the use commenced) was 100 tonnes per week (or 5,200 tonnes per annum). From January 2005, the capacity was increased to 74,999 tonnes per annum, which is the figure referred to in the emerging North London Waste Plan and correspondingly in the emerging Site Allocations DPD and Policy SA4 (Table 2). It is worth noting, however, that the 74,999 tonnes per annum capacity is also subject to a limit of 2,400 vehicles per annum, which in effect reduces the permitted capacity. These capacities broadly correlate with the quarterly return records held by the Environment Agency and (with the exception of 2007 and 2008 where the annual throughputs were misstated because of a decimal place error), also correlate with the figures stated in the North London Waste Plan evidence base.¹

The Brantwood Road site that Redcorn has relocated to forms part of a wider waste site known as Brantwood Willoughby Lane. A Waste Management Licence for the combined Brantwood Willoughby Lane Site was issued on 20th December 2006 (MWL80749). This licence imposed a maximum cap of 40,000 vehicles per annum across the entirety of that site.

On 20th January 2012 Redcorn were granted a Standard Rules Permit (EPR/EB3333AD) and Waste Management Licence (WML103763) for a maximum permitted capacity of 75,000 tonnes per annum.

The quarterly throughput returns submitted to the Environment Agency during 2015 reflect the gradual transfer of Redcorn's operation from 44 White Hart Lane to Brantwood Road and increasing waste throughputs:

Q1 2015	850 tonnes
Q2 2015	6,847 tonnes
Q3 2015	7,441 tonnes
Q4 2015	8,641 tonnes
Total	23,779 tonnes

Therefore in summary:

- All Redcorn's waste operations on 44 White Hart Lane have ceased and been transferred to their site at Brantwood Road.
- The permitted capacity of 44 White Hart Lane (75,000 tonnes per annum) has effectively transferred to Brantwood Road with the grant in 2012 of new 75,000 tonnes per annum Standard Rules Permit and Waste Management Licence.
- The permitted capacity of 44 White Hart Lane in terms of vehicles (2,400 per annum) has been replaced with a permitted capacity of 40,000 vehicles per annum at Brantwood Road.

¹ North London Waste Plan – Data Study (Existing Waste Facilities)(July 2014)

- The actual throughput has increased from 6,763 tonnes per annum at White Hart Lane in 2011 to 23,779 tonnes per annum in 2015 at Brantwood Road.

By any measure of throughput or permitted capacity, it is evident that the loss of waste capacity at 44 White Hart Lane has been more than compensated for by the relocation of Redcorn to their new Brantwood Road site.

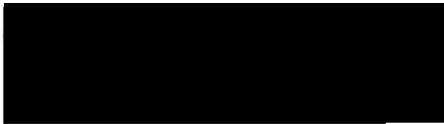
In respect of emerging Policy SA4 (and indeed Policy 5.17 of the London Plan), there appears to be no longer a requirement to safeguard 44 White Hart Lane and the Brantwood Road site should be safeguarded instead.

I should be grateful for your confirmation that (notwithstanding any other land use or development management considerations) that test set out in Policy SA4 would be met and that it would not be an impediment to the redevelopment of the site in accordance with the provisions of allocation ST5 of the emerging Tottenham AAP.

As discussed, it would be helpful to complete any exchange of correspondence on this matter in advance of the 4th March deadline for comments on the various Regulation 19 documents.

I trust this is self-explanatory, however please do not hesitate to contact me if you need any further information or clarification.

Yours sincerely



Richard Serra
Head of Planning
Tottenham Hotspur Football & Athletic Co Ltd

cc Ross Bigley – Environment Agency
Justin Carr – GLA
Lyn Garner – Haringey Council
Sarah Lovell – Haringey Council