

26 October 2011

LDF Team,  
London Borough of Haringey,  
River Park House (6<sup>th</sup> Floor),  
Wood Green,  
N22 8HQ

Dear Sir/Madam

I am writing to set out my response to the consultation referenced below:

**London Borough of Haringey Local Development Framework – Core Strategy  
Publication of a Development Plan Document (Regulation 27) – additional  
Regulation 27 on Affordable Housing & Employment Land Designations -  
November 2010 (consolidated with further evidence to support changes to the  
Employment Land Designations, September 2011)**

**Response to Consultation 22 September – 3 November 2011**

I would be grateful if you could ensure that my response is passed to the inspector carrying out the Examination in Public of the core strategy.

## **1 Summary of My Response**

Further to Haringey's recent consultation on Proposed Fundamental Changes to Employment Land Designations, I have found no evidenced based argument for the change in designation of the Former Friern Barnet Sewerage Treatment site from Employment Use to Locally Significant Industrial Use, or for removing the current caveat that the site's use be subject **to no adverse effect on the nature conservation value of the site**. I am utterly opposed to this change of designation and to the removal of the associated caveat, if that is the intention.

The former Friern Barnet Sewerage Treatment Works site should be removed from the proposed list of Locally Significant Industrial Sites and awarded the alternative designation of Metropolitan Open Land, which, from an evidenced based perspective, is a more appropriate designation for this site that would better reflect National Planning policy objectives, in particular the key objectives and policies set out in the PPS 1 Supplement on Planning and Climate Change and PPS 9 on Biodiversity. The site's location as part of a key green corridor within the Borough, its connection to neighbouring Green spaces, combined with the current under-provision of both woodland and local nature reserves within the Borough, as

evidenced in Haringey's Biodiversity Action Plan of October 2009, mean this site should be protected from development, to prevent further fragmentation of the important matrix of green spaces of which the Former Sewerage Treatment works site is a part. Haringey should also seek to have the site designated as a Local Nature Reserve.

Furthermore Haringey should consider using this site to create pedestrian or cycle routes from Tunnel Gardens along the side of Muswell Hill golf course across the North Circular to the Retail Park. This would help address the serious air quality issues on key roads in the Borough, improve health, help tackle obesity and reduce carbon emissions, and create a green chain that could form part of a North London greenway and simultaneously provide a key educational resource for the four schools that are in close proximity to this site.

Should Haringey choose not to bring forward this more appropriate designation, the evidence that Haringey has presented suggests that the next best option would be to retain its current designation for "employment **uses subject to no adverse impact on the Nature Conservation value of the site.** A further caveat should be added to this designation stating that any use should be "**subject to not restricting the ability to de-culvert the stream on the site.**" This would ensure that the designation is in keeping with Para 4 of PPS 9 and reflects agreed local biodiversity priorities, including de-culverting this stream.

The proposed change in designation of the Former Friern Barnet Sewerage Treatment works site is not an appropriate strategy when considered against alternatives, it is not based on a robust or credible evidence base and it is not consistent with national policy. The pre-application discussions for a waste processing plant that have driven this change in designation are also ultimately likely to be undeliverable. I explain why this is the case in the remainder of my submission.

I also believe this revised consultation is misleading and inadequate, and that the inspector should recommend that it is repeated again, in a more open and robust way, that is transparent to the real objectives behind the proposed change in designation. This would help to avoid future challenge of the Core Strategy. Consultees will mostly have been unaware that one of the apparent intentions (or consequences) of the proposed change in designation is to remove the caveat that the site's use should be 'subject to no adverse effect on the nature conservation value of the site'. This existing caveat is not listed or mentioned anywhere in the consultation document, nor is it highlighted that the loss of the caveat is a major change to the protection this site would receive if a planning application were submitted. The consultation document also fails to mention anywhere that the site is designated Grade 1 Borough Importance for Nature Conservation value.

To illustrate the importance of this point, the last planning application submitted by London Borough of Barnet for this site - in 1998 - was rightly turned down for reasons, including its impact on the nature conservation value of the site and the site's poor accessibility to public transport. By contrast the proposed change in designation appears to have been introduced solely to assist the approval of an application that Haringey are aware will have a substantial impact on nature conservation if approved. This is a substantial U-turn in planning policy for the site, which is not explained and for which no evidence is offered. This is against a backdrop of national planning policy which, since 1998, has sought ever stringent protection of our green spaces and, in particular, placed climate change adaptation as a key objective of planning policy.

I also believe that consultees will be further misled by the continued reference to the site as the Former Friern Barnet Sewerage Treatment Works site, when the reference fails to highlight that this use ceased half a century ago. Given the time that has elapsed since this site had an industrial use, can I suggest that a more appropriate reference is used in future planning documentation? I have in the remainder of my submission referred to the site as Pinkham Woods, a shorter title that better reflects the present true characteristics of the site.

Fundamentally, a greater concern, which in my view could lead to a successful challenge of the Core Strategy, is that an opportunistic planning application on the Former Friern Barnet Treatment Works site appears to have been allowed to drive the development of the North London Waste Plan, which in turn appears to be driving the Core Strategy. This is not robust plan-making, particularly as there is no robust evidence base to support this process. As many consultees have pointed out during the recent consultation process on the North London Waste Plan, the Pinkham Woods site was only included in this plan due to a flawed scoring system, NWLA's own selection criteria should have excluded the site under their show-stopping criteria, as it forms an intrinsic element of a designated green corridor.<sup>1</sup> This was only one of a number of errors made by NLWA's advisors, which will no doubt be examined by the inspector at the examination in public of the NLWP early next year. These are identified in submissions that have been made by the Pinkham Way Alliance and others in relation to the examination in public of the Core Strategy and which can be downloaded from Haringey's website.

Essentially, no evidence has been presented that would support the need for the Pinkham Woods site to be designated as industrial land, thus outweighing the need to protect this site for its nature conservation value, particularly as the evidence presented suggests a) that there is a declining demand for industrial space and b) that there are large tracts of obsolete employment and industrial land in the Upper Lea Valley that could provide this use. The Upper Lea Valley is also a focus for planned housing development which could make use of the waste heat from any industrial process, and is in an area where it is intended to focus green industries and resource management uses.

Haringey have ignored the strong evidence for further increasing the environmental protections awarded to the Pinkham Woods site.

I set out below a more detailed appraisal of the assessment that has led to my recommendations above and which aims to respond to a number of the key questions asked of consultees.

## **2 Is the change in designation based on robust or credible evidence base?**

### **2.1 The Evidence Presented**

The consultation document is selective in the evidence and policy it presents, but, putting that aside, the evidence that is presented can be briefly summarised as follows:

- The Mayor's Industrial Capacity SPG notes that there is a surplus of industrial land in the Northern Sub-region, with the scope to release 814 hectares of land. Haringey is a limited transfer region, which means safeguarding the best quality sites and

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<sup>1</sup> Table 2.2 North London Waste Plan. Preferred Options Technical Report. Mouchel. October 2009

managing the rest to avoid vacancy rates where possible. (Para 5.1.9) ***This does not imply a strong demand for industrial uses and also implies that sites in current industrial use would be those that would be protected.***

- In relation to the strategic industrial locations in Central Leaside and Tottenham Hale, the London Plan promotes that in managing its stock of industrial Land Haringey should make provision for land for waste management facilities. (Para 5.1.6)
- Para 5.1.17 notes there are large tracts of land previously in employment uses in the upper Lea Valley that are now obsolete. ***This implies considerable potential for locating waste facilities in this area.***
- Para 5.1.8 notes there are proposals for 5000 new homes in the Upper Lea Valley which provide a focus for employment generation potential in this area. ***These homes would also provide a potential use for the waste heat from any waste to energy facility.***
- Para 5.1.23 highlights that a published strategy to improve the economic position of the upper Lea Valley includes attracting green industries and resource management.
- Para 5.1.15 notes that the council should consider means to balance industrial and manufacturing activities with service and warehousing sectors with significant growth potential. ***This again implies there will be greater demand for retail and warehousing than other industrial uses.***
- In describing what Locally Significant Industrial Sites (LSIS) are the document notes these are well established industrial areas and the aim is to retain them for uses that fall within B1(b), (C), B2, B8 or similar uses. ***The Former Friern Barnet Sewerage Treatment site was last used for an industrial purpose half a century ago, it has long since been designated as scrub and woodland and is one of only nine sites in Haringey considered as being of Grade 1 Borough Importance for Nature Conservation***
- Para 5.1.26 notes the Council is committed to reducing and mitigating the negative effects of climate change, and will support and promote the development of green industries. The council will expect major developments to incorporate CHP. ***The pre-application discussions relating to the proposed waste facility at Pinkham Way have expressly stated that energy will not be generated from the waste on site, and the site has limited potential to do so compared with other sites such as Edmonton.***

Based on this summary, there is no apparent evidence presented in the consultation for why a decision should be taken to re-designate as a Locally Significant Industrial area a woodland a) that is designated as Grade 1 Borough Importance for Nature conservation and b) which has not been used for an industrial purpose for half a century, given a backdrop a) of declining demand for industrial uses, and b) an evidence base that suggests that the Upper Lea Valley would be a more appropriate place to locate such activities.

Locating a major waste facility in an area that cannot easily utilise waste heat for energy (the surrounding homes are relatively low density) does not present a low carbon solution to London's Waste issues. By the time the proposed plant reaches the end of its life we will need to have reduced per capita CO<sub>2</sub> emissions in London from around 10 tonnes CO<sub>2</sub> per person per annum to 2 tonnes per person. To achieve such targets we do not have the luxury of double handling waste by road. We also need to plan approaches that reduce road transport in general and promote walking and cycling as the primary modes of travel for

shorter journeys. I discuss this further under section 4 of my response in relation to alternative approaches.

## 2.2 Important Evidence Excluded from the Consultation

I have a key concern regarding the robustness of the consultation exercise and the proposed change in designation, in that, in both cases, the nature conservation value has not been adequately considered in relation to Local or National Policy. Key evidence that is missing from the consultation document includes:

- The Former Friern Barnet Sewerage Treatment Works site was closed in 1963 and since that time has been left empty to develop into a rich wildlife habitat. The GLA Site Assessment record from 2003 describes the site as *“a typically diverse wasteland site, with a high botanical diversity. Several uncommon plants include bee orchid (Ophrys apifera). The nationally scarce golden dock (Rumex maritimus) has been recorded here in the recent past.”* My own experience of visiting the site to photograph insects (my hobby) is that it is the richest site for wildlife that I have visited anywhere in London.
- Its current UDP designation as employment use is **“subject to no adverse effect on the nature conservation value of the site”** This part of the designation is conveniently not mentioned in the consultation..
- While the site is noted as being a site of Importance for Nature Conservation (SINC), the consultation fails to mention that it is one of only nine sites in the Borough that is designated as being of Grade 1 Borough Importance for Nature Conservation Value.
- Haringey’s Biodiversity Action Plan (BAP) of October 2009 identified an important opportunity to de-culvert the stream on this site as one of a limited number of opportunities to restore watercourses within the Borough.
- Haringey’s BAP highlights that Haringey currently has only 0.16 hectares of Local Nature Reserves per 1000 residents compared to Natural England’s recommended ratio of 1 hectare per 1000 population. The current ratio is predicted to fall to 0.14 hectares by 2016 due to population growth.
- The BAP has established a target to create an additional 0.5 Hectares of woodland within the Borough

Page 28 of the consultation document identifies that the change in designation *“Complies with pre-application discussions that have already taken place “to use part of the site for a recycling centre and other part as a waste station”*. To the casual observer this might reassure the reader that these plans are sensible, compliant with policy and reasonable, which is clearly not the case.

As Haringey will be aware, these pre-application discussions relate to the North London Waste Authority’s and London Borough of Barnet’s joint application to build a 300,000 tonne per annum mechanical biologic treatment (MBT) plant and associated vehicle depot on the site. NLWA have confirmed they are only aware of one plant in Europe that is substantially bigger than this plant, (there are a few that are 305,000 tonnes per annum but let’s not split hairs). I mention this statistic only to give a sense of the scale of this facility, and the inevitable and quite obvious impact it will have on the nature conservation value of the site. As set out later in this document the proposal is expected to remove 3.6 Hectares of

woodland from a site with a total area of somewhere between 6.3 and 6.8 Hectares depending on the documents referred to.

The recognition of the importance of this site for nature conservation is perhaps one of the reasons why it has never been developed to date.

A key question not raised or answered in the consultation document is whether the proposed re-designation as Locally Significant Industrial Land will include the same phrase “subject to no adverse effect on the nature conservation value of the site”

As this is not included in the policy wording set out in Haringey’s consultation document, my assumption is that Haringey is intending to drop this caveat. This would also need to be the case for the change in designation to be “compliant with pre-application discussions” concerning a 300,000 tonne waste facility and vehicle depot, as it cannot by any stretch of the imagination be possible to take what is, in effect, a highly bio-diverse site covered entirely by woodland and scrub, and build over the majority of it, without having an adverse effect on its nature conservation value. If Haringey were intending to maintain the current environment protection, the pre-application discussions referred to are undeliverable, as it would not be possible to approve an application of this scale with the caveat in place. It would thus have to be refused; hence the proposed policy is undeliverable.

Assuming the words “subject to no adverse effect on the nature conservation value of the site” are to be removed, a substantial shift in policy for the site is denoted that should have been highlighted in the consultation document. Failure to do so makes me question whether the consultation can be considered robust. If this issue had been highlighted, the response to the consultation would, I imagine, have been very different. Hence one can only assume this will be a concern to the inspector in regard to future legal challenge to the Core Strategy.

The Pinkham Way Site identified in the North London Waste Plan is identified in Haringey’s Biodiversity Action Plan of October 2009 as a Site of Importance for Nature Conservation. The 6 Hectare site consists of woodland and scrub that has matured over more than four decades and forms part of a wider ecological corridor. The Sustainability Appraisal of Haringey’s emerging core strategy recommended that their proposed Policy SP13 – Open Space and Biodiversity included reference to protecting wildlife corridors and green links. The same Sustainability Appraisal also highlighted that Haringey’s proposed Employment Policy SP8 had potential for negative impacts in particular relating to the environment.

### **3.0 Is it consistent with National Policy?**

In their recent white paper ‘The Natural Choice: Securing the Value of Nature’ (June 2011), the Government has highlighted that we are currently failing to manage a decline in the UK’s biodiversity, and that this is having detrimental impacts on people’s lives and ultimately the UK economy. The opening paragraph states that **“nature is sometimes taken for granted and undervalued. But people cannot flourish without the benefits and services our natural environment provides.”**

A theme that is highlighted throughout the White Paper is the impact of fragmentation; it states that “The fragmentation of natural environments is driving continuing threats to biodiversity.” It would seem therefore that the appropriate response from planners would be to do all in their power to avoid this further fragmentation.

The White Paper references the Making Space for Nature Review of terrestrial wildlife sites which argued that we must:

- Improve the quality of current wildlife sites by better habitat management
- Increase the size of existing wildlife sites
- Enhance connections between sites, either through physical corridors or through Stepping Stones
- Create New Sites
- Reduce the pressure on wildlife by improving the wider environment

These principles are not new and are already enshrined in National Policy that the Core Strategy should be reflecting. Paragraph 9 of Planning Policy Statement (PPS 9) on Biodiversity states that:

*“Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education. Criteria-based policies should be established in local development documents against which proposals for any development on, or affecting, such sites will be judged. These policies should be distinguished from those applied to nationally important sites.”*

While not yet a local Nature Reserve, Pinkham Woods is a local site and designated in the UDP as Grade 1 Borough Importance for Nature Conservation.

Paragraph 10 of PPS 9 states that:

*“Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as a SSSI). They should not grant planning permission for any development that would result in its loss or deterioration unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat. **Aged or ‘veteran’ trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided.** Planning authorities should encourage the conservation of such trees as part of development proposals”*

This paragraph is relevant, as there are veteran oaks on the perimeter of the Pinkham Wood site that most likely once formed part of Tottenham Wood, the same ancient woodland that contained the present Bluebell Wood to the south of Muswell Hill Golf Course, a short distance from Pinkham Woods.

It is however Paragraph 12 “Networks of Natural habitats” of PPS 9 which is most relevant to my response; this states that:

*“Networks of natural habitats provide a valuable resource. They can link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. **Local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development, and,***

*where possible, strengthened by or integrated within it. This may be done as part of a wider strategy for the protection and extension of open space and access routes such as canals and rivers, including those within urban areas”.*

In an e-mail to Sule Nisancioglu, Head of Planning Policy, Design and Conservation, dated 9th March 2011, Ian Holt, Haringey’s Nature Conservation officer, makes the following observations regarding the Pinkham Way site in relation to the pre-application discussions:

*“I have attached a letter from the Environment Agency which confirms that the watercourse running in a culvert beneath the site is highlighted in the London Rivers Action Plan for de-culverting. There are also habitat statements for both ‘Rivers and Streams’ and ‘Wasteland’ in Haringey’s Biodiversity Action Plan, the site is mentioned by name in the statement for Rivers. Both Rivers and Wasteland are London Biodiversity Partnership priority habitats.*

*I have some further information from the ARUP ecologist which I will forward shortly, this shows that 3.6ha of woodland will be destroyed as part of the development should it go ahead as currently proposed. Please note that we have a LB Haringey target to increase woodland in the borough by 0.5ha by 2015.*

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

This latter point is the one of greatest significance in terms of plan-making, as it rightfully acknowledges that the site is at the centre of a wider network of green spaces, connected by a designated green corridor to Alexandra Palace Park. Ian Holt only refers to those sites in Haringey; it also needs to be recognised that the green corridor extends northward into a patchwork of green spaces in the London Borough of Barnet, including a large area of parkland next to the Friern Barnet Retail Park and Coppetts Wood beyond.

The other points are, however, also relevant, as they demonstrate the proposed change in designation of the site. Any removal of the wording ‘subject to no adverse impact on the nature conservation value of the site’ goes against other national policy, in particular that local development documents should aim to reflect the priorities set out in Haringey’s Biodiversity Action Plan.

A more robust and evidenced based planning approach would be to protect this site fully from development and prevent the fragmentation of this key element of a wider matrix of green spaces. This could be achieved by designating the site as Metropolitan Open Land or as a Local Nature Reserve. If Haringey were applying National Policy this is the designation the site would be given.

In practice Haringey are seeking to ignore national policy totally and change the site’s designation (based on no credible evidence), to pave the way for a planning application that they are aware would have substantial impacts on the nature conservation value of the site and which will be to the further detriment of the wider green spaces to which it is linked.



Para 4 of PPS 9 on Biodiversity states:

*“Local authorities should take an integrated approach to planning for biodiversity and geodiversity when preparing local development documents. They should ensure that policies in local development documents reflect, and are consistent with, national, regional and local biodiversity priorities and objectives (including those agreed by local biodiversity partnerships).”*

This national guidance, in effect, requires Haringey to ensure that policies in its local development documents reflect, and are consistent with, the Borough's own Biodiversity Action Plan (BAP) of October 2009. Section 2 of the Biodiversity Action Plan states it was developed through internal and external consultation with a wide number of organisations and Council services. It notes *“the principal method for consultation is via the Project Working Group which is made up of representatives of several Council services but also both the Haringey and London Biodiversity Partnerships”*. It can therefore reasonably be assumed that the BAP is in effect a good record of local biodiversity priorities and objectives.

It is worth highlighting a number of the priorities set out in the BAP of October 2009.

The BAP begins by setting out why it is important to preserve biodiversity. I would like to remind Haringey of two of the many points noted:

*“Studies have shown that nature helps to enhance our physical and mental health, by encouraging outdoor recreation, exercise and relaxation. Biodiversity plays an important role in enhancing and encouraging outdoor recreation by increasing the variety, attractiveness and interest of the landscape. Biodiversity also plays an important role in educating us about the world around us.*

*It offers opportunities for community engagement and volunteering. Local biodiversity projects offer opportunities to engage local communities and promote social inclusion. Many people derive huge satisfaction as volunteers in conservation projects, giving them an opportunity to get involved in.”*

As someone who has a keen interest in nature, who regularly uses the limited natural spaces in Haringey and who, as a parent, is trying to interest my sons in nature (against a greater interest in Play Station) these are reasons for protecting biodiversity that I very much agree with. They are also particularly relevant to the site in question, given its location at the heart of a mainly residential area and in close proximity to four local schools: Alexandra Park School, Rhodes Avenue School, St Martin of Porres RC Primary School and Hollickwood School. It should be remembered that this local community has been using this site for at least four decades for activities including blackberry picking, apple picking, dog walking, the study of nature and BMX riding. These activities only ceased recently, when the NLWA/London Borough of Barnet erected a security fence around the site.

Haringey's BAP goes on to set out a number of objectives and Actions. Those listed under Recreation Services include:

***“Objective***

*To improve biodiversity value within Haringey and increase its accessibility to residents and visitors alike.*

***Actions***

To actively manage Council owned sites to achieve the aims and objectives identified in the Greenest Borough Strategy and Biodiversity Action Plan including:

- Produce and implement a Borough Tree Strategy
- Produce a Parks Climate Change Adaptation and Mitigation Action Plan
- Include adaptation and mitigation actions in site/park management plans
- Work with partners to improve biodiversity in open spaces and **protect and improve local sites of importance for nature conservation**
- **Reduce areas of deficiency in access to natural greenspace**
- Produce and deliver Habitat and Species Action Plan targets
- **Increase the number of Local Nature Reserves from 3 to 6**
- To provide support to individuals, schools, local organisations, other council services and the private sector in achieving the objectives identified within the Biodiversity Action Plan and Greenest Borough Strategy.”

The BAP notes the borough has a total of 59 areas designated as Sites of Importance for Nature Conservation (SINCs), of which 5 are of Metropolitan importance, 9 of Borough Grade I importance, 13 Borough Grade II and 32 of Local importance. Pinkham Woods (the Former Friern Barnet Sewerage Treatment works site) is 1 of the 9 given Grade 1 Borough Importance.

The BAP highlights that Natural England suggests a ratio of 1 hectare of LNR for every 1000 population. Haringey currently has 0.16 hectares per 1000 residents and it is predicted that this will fall to 0.14 hectares by 2016 due to population growth. While the BAP does identify four potential new areas for Nature Reserves, it does not indicate to what extent the apparent shortfall would be addressed by these new areas, but it does say that it is unlikely that the Natural England target for LNRs will ever be achieved in such a densely populated area as Haringey. To me, this seems a little defeatist, especially when there are sites of the calibre of Pinkham Woods.

It should be noted that the well used Local Nature Reserve Coppetts Wood in Barnet once contained a sewerage treatment works which was closed at the same time as the Friern Barnet Sewerage Treatment Works. Coppetts Wood was designated a Local Nature Reserve in 1998 and now hosts an annual Woodland Festival and has a strong body of volunteers who manage it for its nature conservation value.

In relation to waste land sites like Pinkham Woods, Section 9.3.1 of the BAP states:

*Due to the rapid rate of development many of Haringey’s best waste land sites have been lost however it is hoped that where they have been designated as Sites of Importance for Nature Conservation that they can be protected and managed in favour of wildlife.*

Failing to protect Pinkham Woods from development is not in keeping with this objective and therefore Para 4 of PPS 9.

Under the heading Rivers and Streams the BAP states:

*“Haringey’s watercourses have suffered as a result of urbanisation to the extent that now only a few sections of the Borough’s natural streams can be seen above ground. Always an extremely valuable habitat **the importance of rivers and streams for wildlife will only increase due to climate change putting increased pressure on natural resources.** Improving these habitats will be essential in mitigating any negative effects of climate change. There are limited opportunities to improve or increase this habitat due to the built up nature of the Borough but planning policy offers a degree of protection from further development along*

*watercourses and the Council seeks to promote river corridors as important areas of open land. This includes seeking to restore and enhance natural elements of the river environment through actions such as deculverting and/or naturalisation, and contributing towards the conservation and enhancement of the ecology of all rivers and the floodplain.*

*Recent works have seen improvements to the water quality of the Coldfall Stream in Coldfall Wood and future plans include the restoration of the River Moselle in Lordship Recreation Ground, Tottenham. Other opportunities to restore water courses exist on the former Friern Barnet Sewage Works site and in plans for the Haringey Heartlands development area. Haringey will work with numerous partners including landowners, the Environment Agency and Thames Water in achieving improvements to this habitat.”*

In a letter to London Borough of Haringey dated 29 September 2010 headed “Pre-Application Enquiry Regarding Proposed Development Of A Waste Management Facility Pinkham Way, Adjacent To The North Circular, Muswell Hill, Haringey” the Environment Agency note that:

*“The watercourse is highlighted in the London Rivers Action Plan as a watercourse to be deculverted. The development should look extensively at how this can be achieved. There are two main options:*

- 1. de-culvert on its current course*
- 2. de-culvert on a new course”*

By contrast the NLWA, whose proposed development these pre-application discussions relate to, wrote to the London Borough of Haringey on 21 June 2011 to comment on the Haringey Site Allocations DPD. In relation to the Former Friern Barnet Sewerage Treatment site they referenced the following description in the draft DPD:

**Friern Barnet former Sewage Works, Pinkham Way, N10** (page 53). The site is described as ‘*derelict, formerly used as a sewage treatment works*’, with ‘*employment generating uses and opportunity to de-culvert stream*’ proposed as options.

They then commented:

*“the Authority considers that it is inappropriate for the site description of Pinkham Way to refer to the ‘opportunity to de-culvert stream’. The Authority is unsure why this has been specifically included, particularly when the site is identified within the North London Waste Plan as a potential site for future waste facilities and as a Defined Employment Area. We request therefore that this reference is removed”.*

This letter implies that the proposed development, that Haringey’s pre-application discussion relates to, would prevent a key opportunity presented in the BAP and listed in the London Rivers Action Plan from being taken forward. This could be the only reason for NLWA wanting this reference to be removed. From a National Planning policy perspective it is essential that any designation attached to the site recognises this opportunity, and prevents any development that would prevent the opportunity from being realised.

Under the heading Woodland Habitat Action Plan the BAP sets the following targets:

- To conserve and enhance Haringey’s woodland for the benefit of biodiversity and for both the current and future generations of people.
- To increase the area of woodland in Haringey, particularly in areas where there is little accessible woodland.
- To increase the extent of woodland habitat in Haringey by 0.5 hectares by 2015

Information received through a Freedom of Information request identified that the pre-application discussions Haringey have been engaged in, and which the consultation document refers to, would have the following impacts on habitat on the Pinkham Woods site:

#### Tabulated Results:

Habitat Type	Area Before	Area After	Net Balance
Woodland	3.6ha	0ha	<b>-3.6ha</b>
Scrub	0.85ha	1.5ha	<b>+0.65ha</b>
Grassland	1.4ha	0.7ha	<b>-0.7ha</b>
Ruderal	0.1ha	0ha	-0.1ha
Formal Planting	0ha	0.2ha	+0.2ha
Short Ephemeral	0.85ha	1ha	+0.15ha

Source: Pinkham Way Ecological Assessment and Mitigation. Word Document provided by London Borough of Haringey in email 7 June 2011, in response to Freedom of Information Request.

The document notes the expected loss in habitat is a best case scenario, assuming that all of the applicant's landscape proposals are taken forward. Clearly, destroying 3.6 Hectares of woodland (the term used by Ian Holt in the email referenced earlier) from a Grade 1 site of Borough importance for Nature Conservation goes completely against many of the objectives set out in the BAP, including the plan to create additional woodland within the Borough. Changing the designation of the site, to enable the progress of a development in connection with which Haringey are having pre-application discussions, is clearly, given the expected consequences of this development, against National Policy.

There is a wider point, that the Core Strategy should at least take account of the responses received through consultation on the Core Strategy. While the detailed responses received to the Issues and Options paper appear to have been removed from Haringey's website, Haringey's Summary of Responses to the Core Strategy Issues and Options Paper<sup>2</sup> noted the following responses to their consultation in relation to Protecting, enhancing & improving access to public open spaces & nature:

*“Respondents strongly opposed development on green open spaces. The majority of respondents felt that the number and extent of green spaces should be increased and that developments should contribute to wildlife habitats.*

*Natural England are keen to see Haringey link with other boroughs to identify a network of existing and planned green spaces as mentioned in the East London Green Grid Framework and would like to see evidence of how the green space deficiencies in some areas will be addressed. Other respondents were keen to ensure that every opportunity is taken to increase green and open spaces and to maintain existing facilities and green spaces. Some concern regarding building in parks/open spaces as a driver towards increased use but some support for facilities such as cafes to ensure footfall. A number of respondents suggested the re-introduction of park keepers as a key improvement tool. GLA requested reference to the Lee Valley Ramsar Site, Policies 3D.8 and 3D.11 and London Plan guidance on DPD policies for biodiversity. Environment Agency advise that protection and enhancement can be achieved by naturalising river corridors and incorporating buffer zones into waterside development. Other respondents supported the integration of wildlife habitats into new development suggesting measures such as green walls and roofs, bird/bat nesting boxes and the inclusion of ‘wild spaces’ as part of development. “*

<sup>2</sup> [http://www.haringey.gov.uk/core\\_strategy\\_-\\_summary\\_of\\_issues\\_and\\_options\\_consultation\\_responses.pdf](http://www.haringey.gov.uk/core_strategy_-_summary_of_issues_and_options_consultation_responses.pdf)

I assume it can be concluded from this summary that no responses supported building over existing green spaces, especially those of Grade 1 Borough Importance.

PPS 9 is not the only National Planning policy that the proposed change in designation fails to take into account. A further key reference is the PPS 1 Supplement on Planning and Climate Change. This establishes the following key objectives for the planning system (I have emboldened those of particular relevance to this consultation):

“To deliver sustainable development, and in doing so a full and appropriate response on climate change, regional planning bodies and all planning authorities should prepare, and manage the delivery of, spatial strategies that:

- make a full contribution to delivering the Government’s Climate Change Programme and energy policies, and in doing so contribute to global sustainability;
- in providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live and work, **secure the highest viable resource and energy efficiency and reduction in emissions;**
- deliver patterns of urban growth and sustainable rural developments that help **secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and, which overall, reduce the need to travel, especially by car;**
- secure new development and shape places that minimise vulnerability, and provide resilience, to climate change; and in ways that are consistent with social cohesion and inclusion;
- **conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change;** reflect the development needs and interests of communities and enable them to contribute effectively to tackling climate change; and
- respond to the concerns of business and **encourage competitiveness and technological innovation in mitigating and adapting to climate change.”**

The PPS 1 Supplement is just one of a number of Government policies that aim to ensure the UK meets legally binding targets set out in the Climate Change Act to reduce UK CO<sub>2</sub> emissions by 80% by 2050, and to develop a national climate adaptation strategy. The PPS 1 supplement is particularly relevant given the intended use of the site. It reinforces the points made earlier about needing to adapt to climate change for example by protecting key green corridors but it also introduces the additional element of spatial planning helping to reduce CO<sub>2</sub> emissions for transport and energy use in buildings.

Given that the consultation presents no evidenced based argument for the need for additional industrial land, or for its location on a site that has not had an industrial use for half a century (and which is currently designated as Grade 1 Borough importance for Nature Conservation), I am in my response forced to address the real driver behind the change in designation, which is to facilitate the use of the site for a waste plant, a use which is proposed in the draft North London Waste Plan, which will undergo its examination in public early next year.

From all I have read regarding this proposal, the inclusion of the Pinkham Woods site in the draft North London Waste Plan as a site for new waste management facilities has not been driven by any evidenced based plan-making approach, but, instead, by financial drivers within the London Borough of Barnet. I have concluded, from what I have read and from attendance at public meetings at London Borough of Barnet, that the primary objective behind these plans is to enable the relocation of London Borough of Barnet’s vehicle depot from its current Mill Hill location, so that the Mill Hill site can be redeveloped and create a

source of revenue for LBB. London Borough of Barnet have, I understand, recently approved the planning application for this re-development. The additional driver has been that Barnet, who had previously had planning applications for the Pinkham Woods site refused, would be able to gain some revenue from a site which it had not been able to develop for the past 48 years, due to its poor public transport links and nature conservation value.

Barnet have, I understand, sold part of the site to the North London Waste Authority for a sum in excess of £12million, a sale which I understand was made unconditionally, ie the North London Waste Authority, in buying the land, will have risked losing £12million of what I assume is public money unless their planning application is approved.

While it is laudable for Barnet to seek creative ways of generating income to help address budgetary constraints resulting from the recession, it is not in keeping with national policy for these approaches to be at the expense of protecting our natural capital.

Clearly London Borough of Barnet would not have been able to obtain planning approval for a vehicle depot on the Pinkham Woods site, but, by linking the application to a waste facility, they aim to present an argument that the waste facility is essential infrastructure that overrides the site's importance for nature conservation. That is not a trade-off I agree with, or which is supported by the evidence presented in the consultation document, the NLWP or the Core Strategy.

It is worth exploring whether policies aimed at locating a waste plant on the Pinkham Way site, as opposed to other potential sites, are in keeping with National Planning Policy and, in particular, the PPS 1 Supplement, or indeed whether there is a need for the proposed volume of waste management in the first place.

### **Rational for locating a waste plant at Pinkham Woods**

#### **Does it represent the lowest CO<sub>2</sub> option for transporting and treating waste?**

The Former Friern Barnet Sewerage Treatment Works Site (Pinkham Woods) is located on one of the most significant bottlenecks on the North Circular road, as the traffic reduces from three lanes to two lanes as it passes under the mainline railway bridge at the junction with Bounds Green Road (see Figures 1 and 2 at the end of my submission). This congestion is a problem that will worsen as improvements to other sections of the North Circular, including the junction with the A1, increase the flow of traffic on the wider network.

The pre-application discussions referred to in the consultation document relate to the provision of a 300,000 tonne per annum Mechanical Biological Treatment (MBT) alongside a vehicle depot; these uses are expected to result in upwards of 1000 vehicle movements a day. The MBT plant will take domestic refuse, remove recyclates and convert the residual waste into solid refuse derived fuel (SRF). There is no scope for and no plans to utilise energy from the SRF on site, which from a CO<sub>2</sub> perspective means that, for the likely 30 to 40 year duration of the procurement contract, the waste will be driven from its point of generation to this site, and then from this site to where it could usefully be converted to energy. The NLWA have confirmed it would not be possible to utilise rail transport from this site, so the waste will in effect be double handled by road transport for the duration of the plant's life.

By contrast, the GLA, in their response to the North London Waste Plan<sup>3</sup> consultation, have highlighted that the Eco Park site in Edmonton (another potential location for this facility) can utilise the Lea Navigation Canal for Water Borne Transport of waste, and generate energy on the same site in a CHP plant, potentially supplying this energy via district heating networks to supply the 5000 new homes planned in the Upper Lea Valley which are referenced in Haringey's consultation document. Treating waste at Edmonton therefore has the potential to halve transport emissions for the 300,000 tonnes of waste, compared to a plant located at Pinkham Woods, as well as utilising waste heat from the electricity generation process.

Were the opportunity to connect the 5000 homes to a CHP facility at Edmonton not to come forward, the SRF could at least be transported by canal to its final use. The NLWA have recently announced that Covanta plan to transport SRF by barge from Edmonton to Silvertown where it will be used to fuel a CHP plant at Tate and Lyles' sugar processing plant<sup>4</sup>, confirming this as a deliverable opportunity. This would appear to me to be the low carbon sustainable outcome that the North London Waste Plan and Haringey's Core Strategy should be seeking to deliver, and which the Mayor's Draft Climate Mitigation and Waste Strategies would support.

The GLA's letter notes that *"Edmonton Eco Park is currently the main site for dealing with waste in North London. The site has space for further consolidation, and given its excellent road links, access to the Lea navigation and potential to provide heat and power to neighbouring development it should be developed as North London's primary waste site."*

While the same GLA letter accepts the principle of the use of the Pinkham Woods site as a waste site, it highlights the challenge presented by its dual designation as a SINC as well as the proposed designation for industrial land. I would question whether the GLA's acceptance of the Pinkham Woods site within the North London Waste Plan can be regarded as being in keeping with the National Planning policy position that I have highlighted above, again a point which can be debated at the examination in public of the North London Waste Plan early next year.

Access to the site is via two narrow slip roads off the North Circular, which pass close to housing at Pert Close and cross the pedestrian crossings that link the Friern Bridge retail park and associated green space to the residential communities on the opposite side of the North Circular. These slip roads are accessed via the often heavily congested junction with Colney Hatch Lane, which also serves as the primary access to the Tesco Store, the main food shopping destination for those living in the area. The slip roads do not appear ideally suited to heavy waste vehicles, although I assume this could be addressed by widening of these slip roads and introducing safety measures to avoid safety conflicts at the pedestrian crossing points. (See figure 3)

Tailbacks on the North Circular at Bounds Green junction (see figures 1 and 2) mean that local residents wanting to return from Tesco and other destinations to the Bounds Green area already opt to take the long route round Colney Hatch Lane and Alexandra Park Road. This, combined with traffic calming measures that have closed Grosvenor Road to through

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<sup>3</sup> Letter from Boris Johnson to Archie Onslow at NLWA 6 July 2011 in response to consultation on the North London Waste Plan.

<sup>4</sup> [http://www.nlwa.gov.uk/news/solutions\\_and\\_sites\\_proposed\\_for\\_use\\_of\\_north\\_london's\\_residual\\_waste](http://www.nlwa.gov.uk/news/solutions_and_sites_proposed_for_use_of_north_london's_residual_waste)

traffic and reduced the permeability of the secondary road network, means that the junction between Colney Hatch Lane and Alexandra Park Road has become heavily congested itself, and is a known hotspot for both NO<sub>x</sub> and particulate emissions. The North London Cluster Group Air Quality Modelling report highlights the junction of Colney Hatch Lane and Alexandra Park Road as a potential hot spot for elevated NO<sub>x</sub> emissions, with an expectation they would exceed 60 µgNO<sub>2</sub>/m<sup>3</sup>. The report recommends that further monitoring is carried out at this junction because of the likelihood of elevated emissions. The National objective is for NO<sub>x</sub> emissions to be 40 µgNO<sub>2</sub>/m<sup>3</sup>. London is already failing to meet EU objectives which establish a similar threshold. With 1000 additional vehicle movements through the Colney Hatch Lane North Circular junction each day and likely increased tailbacks on the North Circular, the air quality issues on Colney Hatch Lane and Alexandra Park Road junction are likely to be exacerbated. A particular concern given the sensitive receptors all round this junction.

Air Quality is another very important driver, which provides further support for the alternative approach to this site's designation that I have set out below, and which, from both evidenced based and national planning policy perspectives, would be a more appropriate objective for the long term use and designation of Pinkham Woods.

A more fundamental point is whether the North London Waste Plan actually demonstrates any need at all for the waste management capacity proposed at Pinkham Woods. Several declarations made in response to the examination in public of the Core Strategy have raised this concern. For the sake of brevity I do not intend to repeat the evidence they present here, but both Knights Solicitors letter of the 8th July 2011<sup>5</sup> and Evelyn Ryan's letter to PINS of the 3rd August, make this point quite clearly and set out the evidence for it.<sup>6</sup>

It is my understanding that North London Waste Authority(NLWA) has received 288 responses to their consultation on the North London Waste Plan, I suspect that many of these will have raised similar issues to the two responses highlighted above. It is regrettable, therefore, that NLWA have failed to make these available on their website despite the consultation closing on the 8th July, as these would have provided a useful context for those making responses to this consultation on the change in designation of the Pinkham Woods site.

#### **4.0 Is it the most appropriate strategy when considered against the alternatives?**

The proposed designation of Pinkam Woods as Local Industrial Land is not the most appropriate in relation to alternatives.

As set out above there are strong National Planning objectives to protect green spaces and their nature conservation value, to prevent their fragmentation and to make them more accessible to increase people's understanding of, and empathy with, nature. We at the same time have to deliver drastic reductions in carbon emissions, which will require

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<sup>5</sup> [http://www.haringey.gov.uk/110708\\_letter\\_knights\\_to\\_archie\\_onslow\\_-\\_nwlp\\_final.doc\\_\\_1\\_.pdf](http://www.haringey.gov.uk/110708_letter_knights_to_archie_onslow_-_nwlp_final.doc__1_.pdf)

<sup>6</sup> [http://www.haringey.gov.uk/er\\_objection\\_to\\_nlwp\\_8\\_july\\_2011.doc](http://www.haringey.gov.uk/er_objection_to_nlwp_8_july_2011.doc)



thoughtful spatial planning that creates attractive alternatives to the use of the car. Ultimately our ambition should be for all journeys of less than a few miles that don't require heavy load carrying to be conducted on foot or by bicycle. This in turn would help address a growing obesity epidemic, improve social interaction and give some chance of London meeting legally binding EU air quality directives.

In addition to these drivers there are some issues local to the Pinkham Woods site that require addressing. The Golf course and Pinkham Woods have created a substantial obstruction to pedestrian permeability in the North Part of the Borough; this is a particular issue given the limited public transport connections in Muswell Hill and trips generated by the four schools that surround the golf course and Pinkham Woods site.

The Friern Bridge Retail Park, despite being in very close proximity to a substantial housing catchment area, is considered by Haringey in their consultation as an out of town retail park. This is because it is currently generally accessed by car, because of the lack of pleasant pedestrian and cycling routes to reach it and the obstruction caused by the North Circular. It shows a considerable lack of imagination in policy terms not to try and improve access to this for pedestrians and cyclists. Equally many who live in Alexandra Road and around Hollickwood Park, and those living in the streets around the retail park could have much better access to public transport from Bounds Green and other stations if pedestrian and cycle permeability were enhanced. With the planned regeneration of New Southgate this will in turn create greater demand for trips to local centres such as Muswell Hill and to the four existing schools that surround the Pinkham Woods site.

Many of these issues could be resolved, and National Planning policy drivers better served, by the creation of a North London green chain, incorporating pedestrian and cycle routes that would run from the Friern Barnet Retail Park, across the bridge over the North Circular, through the Pinkham Wood site, along the edge of the Railway Line and Muswell Hill Golf course to the Tunnel Gardens Green Chain. This could be accessed from the Retail Park, Pinkham Way, Cline Road, Blake Road, Alexandra Road and Durnsford Road. By walking or cycling along Crescent Road from Durnsford Road pedestrians or cyclists could continue on to Alexandra Palace and link to the Parklands Walk, allowing a potentially improved cycle route into the centre of London and offering an extended North London green trail. The Green trail could be extended North through Barnet through to Coppetts Wood, although again a section would have to be by road along Ribblesdale Avenue.

Given the overwhelming policy driver to protect green spaces and address climate adaptation, the Pinkham Wood site should be designated as Metropolitan Open Land and then managed as a local nature reserve. This would address national planning priorities and shortfalls in Local Nature Reserves identified through Haringey's BAP.

Under the most likely high emissions scenario and assuming the 50% probability curve, the UK Climate Projections 2009 suggest that London could be 5 degrees warmer by 2080. London's Urban Heat Island will become an increasing problem, and we need to protect all the green spaces we have as part of a strategy of ensuring London's homes can remain comfortable into the future. Research by Manchester University has shown the contribution that Green spaces play in reducing temperatures in urban areas. The Mayor has set out a draft Climate Adaptation Strategy<sup>7</sup>, which has highlighted overheating in homes as one of

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<sup>7</sup> The draft climate change adaptation strategy for London - Public Consultation Draft – February 2010.

the highest risks from climate change in London. A key element of the proposed strategy for dealing with this is to manage rising temperatures in London by increasing the amount of green space and vegetation.

## **5 Conclusions**

In summary it is quite transparent to me that the proposed change in designation of the Former Friern Barnet Sewerage Treatment Works site has not been driven by any evidenced based approach to plan-making, following principles laid down in national and regional policy and taking account of strategic needs in Haringey, but has, instead, been introduced late in the day to enable a specific planning application to proceed on this site. This is fundamentally not sound plan-making and, from my perspective, could result in successful challenge of the Core Strategy, North London Waste Plan and any attempt to approve a planning application on this site in future.

Fundamentally, no evidence has been presented to demonstrate that the need to locate a waste plant on this site exceeds the need to protect its nature conservation value, and, having considered the wider policy perspective and evidence, it is quite clear to me that the opposite is true. We cannot allow our green spaces to be destroyed and eroded, a principle well established in National Planning policy and being given ever greater weight by the Government's recent white paper "The Natural choice: Securing the value of nature" and by the Mayor's Own Climate Adaptation strategy.

I would therefore urge London Borough of Haringey and the Inspector to consider a more evidence based designation for the Former Friern Barnet Sewerage Treatment works site, which would be to designate it as Metropolitan Open Land or a Local Nature Reserve.

I also urge the inspector to ensure that any designation of the site carries appropriate wording to protect its nature conservation value and the opportunity to naturalise the stream that runs through the site.

I am completely opposed to any proposals which threaten the nature conservation value of this site, and I am very concerned that an opportunistic planning application by London Borough of Barnet and the North London Waste Authority is being allowed to shape spatial planning in Haringey in a detrimental way, that is not in keeping with National Planning policy and local objectives.

Aside from the proposed change in designation failing to comply with National Policy I have a very personal objection to these proposals. I care about this site and the wildlife it contains. Until visiting this site I had never seen or photographed a long horn beetle or a crab spider, both of which my 9 year old son spotted, which I photographed and which we were able to look up on the internet when we got home - all valuable learning experiences. I suspect most of those making decisions about the future planning of this site have never set foot on it and have no real appreciation of its nature. I would urge them to do so in summer when it is covered in wild flowers and insects. I have attached some pictures to provide a flavour of what you might see; these were all taken at Pinkham Woods. There are many things I have not managed to photograph but which inhabit the site including common pipistrelle bats (we observed or recorded 8 in a short evening survey), tawny owls and a wide variety of other birds. I photographed 10 species of butterfly and at least 7 species of bee in one short visit.

If the planning process is abused and national planning policy ignored, allowing the unnecessary destruction of this site, most of what I have photographed will cease to exist. I and many other members of the community, who I have met in the nine months since the proposals were made known, find that a very depressing prospect.

It seems to me that in this case nature is indeed being taken for granted and undervalued. It is worrying to me that the current leaders of Haringey Council and the planning department lack the foresight to protect Haringey's green spaces for future generations and are apparently content to see them eroded against a national and regional policy background that for good reason is seeking the reverse.

Yours sincerely

Miles Attenborough



Figure 1: Tailback as Traffic Narrows from 3 to 2 Lanes on Approach to Bounds Green Junction. Note Pinkham Woods to Right of Picture



Figure 2 Traffic Tails Back all the Way to the Slip Road from Colney Hatch Junction. Also note the proximity of housing to main slip road from the Pinkham Woods site left of picture



Figure 3 Narrow Slip Road from Pinkham Woods site passes pedestrian crossing and houses on Pert Close, this will carry 1000 waste and other vehicles a day



Figure 4 Woodland Path Pinkham Woods



**Figure 5 Scrubland at Pinkham Woods**



**Figure 6 Woodland ride at Pinkham Woods**



Figure 7 View Towards Golf Course from Pinkham Woods



Figure 8 Comfrey at Pinkham Woods



**Figure 9 Teasels Pinkham Woods**



**Figure 10 Comma Butterfly Pinkham Woods**





Figure 11 Crab Spider Pinkham Woods



Figure 12 Long Horn Beetle and Field Grass Hopper Pinkham Woods

