

**Planning Policy
Freepost LON 11863
London Borough of Haringey
639 High Road
Tottenham
London
N17 8BD**

21st June 2010

Dear Sir/Madam,

The Haringey Local Development Framework:

- **Core Strategy, Proposed Submission, May 2010**
- **Development Management Policies, May 2010**
- **Site Allocations Development Plan Document, May 2010**

Background

The North London Waste Authority (the Authority) is the statutory waste disposal authority for the North London area, which includes the London Borough of Haringey. In that capacity, the Authority has a need to identify and procure sites for new waste facilities within the North London area. This need is driven by legislative requirements to cease disposing of so much waste to landfill (outside of London) and to adopt more sustainable solutions to the growing volumes of waste that are anticipated to arise in North London over the coming years. If the Authority does not meet these legislative targets there will be both financial penalties and increased costs as a result that would then be borne by our levy-paying constituent borough councils and therefore by local residents too. This provides the background for the Authority's standing to comment on the proposed submission stage for the Haringey Core Strategy and associated development plan documents.

The Authority's comments in particular address the development management policies regarding environmental protection and an environmentally sustainable future and three specific sites listed in the site allocations development plan document. The Authority additionally urges more reference to waste-fed boilers and combined heat and power systems within the Core Strategy

in addition to requesting that the role of waste services and facilities as essential community infrastructure is given more prominence across the suite of documents.

We trust the above comments are acceptable and will be taken into account by Haringey in the Submission draft of the Core Strategy. Should you have any queries, in respect to the above or require any clarification, please don't hesitate to contact me.

Please note, that the attached responses are initial 'officer' responses, subject to confirmation at the Authority's meeting on 30th June.

Yours faithfully,

Andrew Lappage
Head of Waste Strategy and Contracts
North London Waste Authority

Consultation Response to the Haringey Core Strategy, Proposed Submission, May 2010 From the North London Waste Authority

As a general comment the Authority recommends that the role of strategic waste management services and facilities should be regarded in the same way as other utilities within the Core Strategy and supporting documents. The emerging North London Waste Plan, which will provide the strategic framework for the allocation of sites suitable for waste management facilities across North London recognises that the seven North London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest have agreed to plan collectively for their 'apportionment' of waste as outlined within the London Plan. Accordingly the strategic importance of any sites for waste management facilities within Haringey must be seen within the North London context with a recognition that they may be handling waste generated across the borough boundaries. The following provides more detailed comment upon specific sections within the Strategy.

Chapter 1 – Introduction

Paragraph 1.3 – Making Haringey Distinctive

The overview of the Muswell Hill Area Assembly (page 38) describes the 'opportunities' in this area as:

'No major development proposed for the area however preservation and enhancement of conservation areas and green spaces are important issues'.

There is no cross reference made to the North London Waste Plan potential waste management site at Pinkham Way. We would suggest that this is included in this section.

Chapter 3 – People at the Heart of Change in Haringey

Paragraph 3.1.10 – Tottenham Hale

The overview of the Tottenham Hale area states that an aspiration for the area is:

"The creation of a new facility for Front Line Services including recycling at Marsh Lane which will promote green industries in the area".

It would be helpful if more information could be provided in the body text regarding the specific proposals for the site and additionally a cross reference made to the Site Allocations Development Plan Document (DPD) where the site is listed as a site 'To be assessed'. The Authority recommends that the site is moved into the 'Sites Suitable for Community/Commercial/Employment Development' list.

Chapter 4 – An Environmentally Sustainable Future

Paragraph 4.1.5 (page 92)

Consistent with the London Mayor's Climate Change Action Plan (2007) decentralised energy networks are proposed at Tottenham Hale and Haringey Heartlands to contribute towards a low carbon Haringey. Other areas might include St Ann's Hospital, Lawrence Road, Northumberland Park, Broadwater Farm and Crouch End. There is reference to making connections to such networks feasible in the future (paragraph. 4.1.5) which is welcomed by the Authority. However, there is no discussion or reference to the significant cost of the same and where this would fall. The Authority considers that there should be some recognition and statement about the often

prohibitive cost barriers of such networks within this section and possibly any assistance that Haringey might give.

Paragraph 4.1.15 (page 94) notes that:

'Decentralised energy means combined heat and power (CHP) used in combination with district heating systems where appropriate.'

and then states that

'CHP systems can be gas fired or waste fed and are a more efficient way of meeting local electricity and heating demands compared with the traditional approach of inputting electricity from centralised power stations and the use of local gas-fired boilers.'

The subsequent paragraph refers to replacing such systems with biomass, biogas or other low-zero-carbon energy sources. No mention is made of waste fed boilers/CHP systems in this paragraph. We would recommend that these are included in the list because this reinforces the potential of energy systems from waste to potentially contribute towards the carbon emissions reduction targets set for the borough as outlined in paragraph 1.4.25.

Paragraph 4.1.21 (page 96) outlines states that:

'The draft North London Waste Plan has considered the potential for linking heat from waste to new development and where opportunities arise, Haringey will support the use of community heating associated with waste management sites.'

However, despite these references to waste fuelled energy and heating systems it is noted that the evidence base document *'Energy Infrastructure Summary'* does not assess the opportunities for waste fed CHP decentralised energy systems.

The Authority recommends that waste fed CHP should be referenced more fully in this section (and the document overall) to reflect the procurement strategy that has been agreed by the North London Waste Authority and agreed by the constituent borough councils, including the London Borough of Haringey.

Paragraph 4.3.5 (page 103)

In relation to waste sites the supporting text at paragraph 4.3.5 states that wherever feasible, intensification and re-orientation of existing waste management sites is required before new waste sites are developed, with a sequential test to confirm this; and

'only high quality waste developments will be considered suitable – in terms of design, minimisation of nuisance, transport and other potentially negative aspects; decentralised energy options shall be fully considered'.

It would be helpful if a reference could be provided at this point to the Development Management Policies DPD, particularly Policy DPM13 Sustainable Design and Construction to provide some context and detail regarding the requirements.

Chapter 5 – Economic Vitality and Prosperity Shared by All

Figure 5.1 (page 116) confirms that the majority of the Pinkham Way site is a Local Employment Area (LEA), along with the Bounds Green Industrial Estate to the east. Paragraph 5.1.11 refers to employment uses other than the B Use Class being considered in LEAs, whilst paragraph

5.1.12 confirms LEAs provide the opportunity to provide essential community infrastructure for the local community at large. 'Waste' is regarded as community infrastructure within the Core Strategy as set out in Policy SP16.

The Authority suggests that reference to the role of waste as community infrastructure is explicitly included in this section, possibly as an example in paragraph 5.1.12 therefore confirming that waste facilities are suitable in LEAs to avoid any confusion about this issue.

Paragraph 5.1.20

The Core Strategy does not explicitly refer to the use of the Pinkham Way site as a waste management site; instead paragraph 5.1.20 refers to the Mayor's Industrial Capacity Study SPG urging boroughs to make employment land available for uses including waste management facilities and to the emerging North London Waste Plan as the document which will identify sites for future waste management facilities. Whilst the Authority anticipates that the protection for existing and future waste management sites as outlined in the London Plan will be referenced and included within the North London Waste Plan, it would be legitimate and helpful for all if the specific use and protection to be afforded to the site could be included here within the Core Strategy document.

Additionally, given the planning history of the Pinkham Way site as a sewage treatment works, that the North London Waste Authority has now exchanged contracts for the Pinkham Way site, that it is listed within the Authority's Outline Business Case for PFI credits and that the North London Waste Plan has set out proposals for potential waste management sites including Pinkham Way, the Authority considers that the site should be clearly listed as a waste site within the Core Strategy. Also, given the economies of scale that can be realised by developing waste facilities to serve more than one borough, the identification of Pinkham Way within the Authority's published plans, and the site's proximity to both Barnet and Enfield, the Authority considers that the site is of such a significant size and strategic importance to justify such inclusion.

Chapter 8 – Delivering and Monitoring the Core Strategy

Policy SP16 – Community Infrastructure

Waste is classified as community infrastructure, as set out in Policy SP16 which confirms that the Council will work with its partners to ensure that appropriate improvement and enhancement of community facilities and services are provided.

The Authority welcomes the recognition of the importance of waste within this context. Additionally the Authority is able to provide some factual updates to the Community Infrastructure Study which will be provided under separate cover.

Draft Consultation Response to the Haringey Development Management Policies DPD
From
the North London Waste Authority

Please find below comments from the North London Waste Authority on the Haringey Development Management Policies DPD:

Chapter 3. An Environmentally Sustainable Future

Policy DMP13 (page 44) sets out the requirements for sustainable development and design, including:

- Demonstration of how the development achieves the highest possible ratings relevant to the type of scheme (e.g. BREEAM) in line with the Core Strategy;
- Provision of a formal energy assessment in line with the London Plan and demonstrating how Core Strategy targets will be achieved;
- Where site restrictions, technical feasibility and/or economic viability mean energy standards cannot be met the scheme can compensate residual carbon emissions elsewhere in the Borough through improvements to existing homes or a one-off financial contribution to the Council;

The Authority believes that there are very specific requirements for designing, building and operating waste management facilities and whilst the development and operation of waste facilities can aspire to very high environmental standards, the Authority considers that it is inappropriate to capture the development of waste facilities within a policy framework more clearly developed for residential buildings. Waste facilities are regarded as community infrastructure and waste management can also be viewed as a fourth utility, creating both employment opportunities and a vital service for the area. The Authority therefore considers that it would be unwise to require such facilities to meet the same design criteria as some other types of residential building or to add unnecessary costs to the development of such an essential public service. The Authority therefore recommends that waste facilities should be exempt from any such policy requirement or at the most that the requirements for waste facilities are drafted such that they must 'have regard to' to these requirements or other appropriate environmental impact schemes.

As currently drafted the Authority therefore has concerns that any such requirements may not be feasible, appropriate or affordable for all types of development and additionally has concerns that the use of the word 'outstanding' standards is insufficiently clear and requires further clarification as it could make otherwise positive developments unaffordable if enforced literally.

Additionally, the Authority notes that paragraph 3.95 (page 47) of the consultation document states that where development is not able to reach the more stringent CO₂ emission target, then there will have to be a payment or investment in alternative allowable solutions which are relevant and acceptable to Haringey, and confirms that details of acceptable alternatives and how commuted payment will be calculated will be detailed within the Sustainable Design and Construction SPD.

Whilst in principle the Authority is supportive of this approach, the Core Strategy and/or the Sustainable Design and Construction SPD needs to recognise that there may in some instances

be difficult decisions to be made trading off CO₂ benefits against job creation/economic benefits of particular schemes. It is important that this point is recognised in the supporting text, as some local improvement may be better than none if the very high levels of CO₂ control and mitigation are unaffordable. It would be helpful if this point could be recognised in the supporting text.

The Authority also has concerns about the practical implementation of any such policy. If a developer puts forward a proposal but states that he/she cannot meet the CO₂ emissions targets required, the Authority is unclear how any further decisions about appropriate payments or investments in alternative allowable schemes would be made. The Authority would argue that any such alternative payment mechanism might also be more appropriately addressed by national government, rather than at a local level.

As an additional point the Mayor of London has included proposals for a Greenhouse Gas Emissions standard for municipal waste management activities to reduce their impact on climate change in his draft municipal waste management strategy. The Authority is unclear how compliance with the Mayoral London-wide system for waste facilities would be taken into account within the Haringey context; this should be clarified within the document. However, it is generally difficult for the Authority to comment in detail upon this policy further without the supporting calculation information available. The Authority would urge that this is provided as a matter of urgency and that an uncompromising approach now is avoided.

Chapter 4 – Environmental Protection

Policy DMP15 relates to environmental protection. Supporting text at paragraph 4.17 (page 54) refers to burning of biomass and associated higher levels of nitrogen oxides and particulates compared to conventional gas and states '*Given the existing poor air quality in Haringey, the use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy. We will expect developments to focus on energy efficiency and energy efficient supply*'.

The Authority is concerned that this policy as drafted, possibly inadvertently rules out the development of energy facilities powered by solid recovered fuel or SRF. SRF may qualify as 'biomass' and these 'biomass' facilities can make a positive contribution to the achievement of carbon reduction targets; the production of SRF is also in line with the procurement policy adopted by the Authority with the support of its constituent borough councils, including Haringey. The Authority therefore recommends that this text is reworded as follows:

*'Given the existing poor air quality in Haringey, the use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy, **except where emissions control equipment, equivalent to that used for waste powered energy facilities is fitted**. We will expect developments to focus on energy efficiency and energy efficient supply'*

Or alternatively the text could be reworded to say:

*'Given the existing poor air quality in Haringey, the use of biomass as a renewable energy source will be the Council's least preferred option for the provision of renewable energy, **except where emissions control equipment meeting WID (Waste Incineration Directive) standards is fitted**. We will expect developments to focus on energy efficiency and energy efficient supply'*

The Authority secondly comments that any policy on environmental protection needs to be future proof, enabling new technological developments to be put forward that meet the Council's objectives. It would be inappropriate for any policy to limit the potential introduction of viable green technologies in North London which assist in meeting the Council's environmental objectives, particularly as the Local Development Framework will be in force until 2026. The Authority therefore considers that the relegation of biomass as a renewable energy source to the Council's least preferred option, may need to be reconsidered over time as technological developments change and it may be helpful to include some additional text in the document to recognise this.

Part g of DMP15 refers to 'defined employment areas'. It is suggested that the policy should be updated to refer to 'local employment areas' in line with the changes proposed at Policy SP8 of the Core Strategy.

Chapter 6 – Well-Designed and Safer for All

In relation to open space and biodiversity, Policy DMP27 states '*Development close to the edge of ... any other valuable open land will only be permitted if it protects or enhances the value and visual character of the open land*'. The policy is somewhat ambiguous as to the definition of '*any other valuable open land*' and it is suggested that the policy or supporting text should be clarified in this regard. It may otherwise become difficult to develop some sites for example, those adjacent to the Lee Valley Regional Park.

The supporting text at paragraph 6.69 is of particular relevance to the Authority's proposals for the Pinkham Way site. This paragraph states '*When assessing development proposals on land adjacent to ... MOL..., the operational needs of utility companies should be taken into account. In particular cases, the essential need for new infrastructure may be found to override the need to protect the visual character of the land*'. The Authority believes that the text should be extended to refer to both '**utility companies and infrastructure providers**'. This revision is requested to ensure that the operational needs of waste management infrastructure providers is also taken into account when bringing forward proposals that will service not only the London Borough of Haringey, but also the wider North London area. Waste services are sometimes referred to as the fourth utility, an essential service required by all. It is therefore considered appropriate for any reference to the operational needs of utility companies to include waste services/infrastructure providers also.

Consultation Response to the Haringey Site Allocations

Development Plan Document

From the North London Waste Authority

Please find below comments from the North London Waste Authority on the Haringey Site Allocations DPD. Whilst the Authority does not have a direct and immediate interest in all the sites which are referred to below, the Authority is commenting upon these sites within the context that they provide essential parts of the municipal waste management infrastructure for the residents of Haringey and North London more generally and in particular will help the area to reach statutory targets in relation to diverting waste from landfill, increase recycling and meeting the self sufficiency targets contained within the London Plan:

From the Authority's perspective the most relevant site allocations are as follows and our comments are provided below:

Tottenham Hale – Ashley Road Depot and Technopark, N15 (page 22). This four hectare site is described as being in the ownership of *'LBH and private'*, with the current use described as *'warehouses'*. Options for redevelopment are *'mixed use including residential, employment, community and/or education'*.

The site includes Park View Road household waste recycling centre and the Ashley Road waste services depot as well as the Technopark offices where the Authority is located. The description of current use is inaccurate and does not reflect the fact that an existing waste site will be lost as a result of redevelopment and accordingly the description of the site needs to be updated.

Marsh Lane, N15 (page 59) is described as a vacant 1.54 hectare site that is suitable for *'facilities for front line Council services including recycling'*. No planning history is referenced although there is a current planning application for redevelopment of the site into a new depot and household waste recycling centre. Additionally there is no cross reference to the Ashley Road Depot (see above) which the Authority understands the new Marsh Lane site would replace. The Authority suggests that both references are included in the description of this site.

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. Other relevant information referred to includes the site's UDP designation as a Defined Employment Area, SINC, Ecologically valuable Site 9, its identification in the NLWP, and areas at risk of flooding and contaminated by Japanese Knotweed. The identified site area is 6.2 hectares, but excludes the westernmost part of the site.

It is noted that the comments submitted to the call for sites by NLWA have not been incorporated in the revised document. Elsewhere in the document where sites were proposed as a part of the Call for Sites, reference is made to the proposed uses not yet being assessed by officers; this does not appear to be the case for the Pinkham Way site and we request that it is.

In addition, 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.

The 'other relevant information' section notes that the site is 'identified in the North London Waste Plan for waste site' which suggests the future potential of the site for waste management although does not fully reflect the emerging proposals for the site. It may be helpful to add further context to provide readers with a better understanding of proposals for the site and the stage at which these are at i.e. identified within the NLWA's Outline Business Case for PFI credits. "The Authority has exchanged contracts to purchase the site from the London Borough of Barnet."