

13 January 2017

By email to: localplan@haringey.gov.uk

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Dear Local Plan team

**Ref: North London Waste Authority response to the LB Haringey Local Plan
Consultation on Main Modifications to the Site Allocations DPD**

Thank you for providing the North London Waste Authority (NLWA) with the opportunity to comment upon the Main Modifications to the Site Allocations DPD. The Authority has the following comments:

SA52 Pinkham Way

North London Waste Authority (the Authority) previously, at the Pre-Submission stage of consultation, supported the proposed planning designation for this site, for both employment use and nature conservation as a Grade 1 borough level SINC albeit with some concerns about Haringey's detailed proposals.

The most recent Main Modifications consultation proposes that the Pinkham Way site be removed from the Site Allocations DPD due to having no identified development over the plan period/designation as employment land in Strategic Policies. The document also notes that the proposed Modification arises from the Examination in Public hearings, at which the Authority was represented and gave evidence. The Authority representative said that the Authority could not determine its specific development needs for Pinkham Way whilst it was still actively applying for a Development Consent Order for major residual waste treatment capacity elsewhere in its area and did not know what the outcome of its application would be.

With the removal of the Pinkham Way site from the Site Allocations DPD, it appears that this site may still be in some way designated or protected for employment use under Haringey's Strategic Policies, principally SP8 as below, but this is not clear.

The Authority notes that a Main Modification to the LB Haringey Strategic Policies document, Policy SP8 will be made as follows:

"The Council will secure a strong economy in Haringey and protect the Borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites, and Local Employment Areas **and other non-designated employment sites.**

The forecast demand is for an additional 23,800 m2 of B Class floorspace up to 2026.

This forecast demand is to be met through:

- The reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes;
- The intensification of the use of existing employment sites (where possible);
- The provision of B1a/b floorspace as part of mixed-use development on suitable sites, including town centre sites; and
- The protection of existing viable B Class Uses on designated and non-designated sites.

The In addition the Council will also:

- ~~Protect B uses (under the Use Classes Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand for an additional of 137,000m2 32,000 m2 of employment floorspace up to 2026 2031;~~

The Authority understands the rationale for removing Pinkham Way from the list of strategic sites required for meeting the identified development needs within the borough, given the lack of a specific identified development proposal for the site during the plan period. However, we note that all other employment sites and areas appear in the Site Allocations DPD, with the exception of SIL that is covered by policy in the London Plan.

We therefore request that you provide written assurance that the existing planning designation of the site is retained for the reasons set out in the Authority's responses to previous versions of the Site Allocations DPD, or that the above SP8 amendment is further amended as follows:

- The protection of existing viable B Class Uses on designated and non-designated sites such as the Pinkham Way site (as per the attached plan).

This is because it is imperative to the Authority that the Pinkham Way site remains designated in an adopted planning policy document in such a way that employment use applications will be favourably received (subject to the dual SINC designation and other relevant prevailing policies). The Authority should not be hindered from developing the site in pursuit of its statutory duties because it was not able to put forward a specific development proposal at the time of Haringey's review of its Sites Allocation DPD.

If you have any questions, please do not hesitate to contact me.

Yours sincerely


Andrew Lappage
Head of Operations