

By email to: ldf@haringey.gov.uk

Haringey Planning Policy
River Park House
225 High Road
N22 8HQ

**North London
Waste Authority**

Unit 1B
Berol House
25 Ashley Road
Tottenham Hale
London N17 9LJ

T 020 8489 5730

E post@nlwa.gov.uk

W nlwa.gov.uk

wiseuptowaste.org.uk

Original 27 March 2015 with correction dated 7 April 2015

Dear Planning Policy Team,

RE: North London Waste Authority (NLWA) response to the Preferred Option Draft of the Sites Allocation Development Plan Document, February 2015

1. Thank you for providing North London Waste Authority (NLWA) with an opportunity to comment upon the above document which we welcome; please see NLWA's comments below.
2. NLWA is a statutory waste disposal authority that is responsible for managing the local authority collected waste from seven north London Boroughs including Haringey. Although we also make a short comment at the end of this response about the Crossrail 2 proposals referenced throughout the consultation document, the majority of our comments are focussed upon the draft allocation for site SA 52: Pinkham Way; NLWA owns part of the site which is to the north of the borough, on the borders of Barnet and Enfield. The remaining part of the site is owned by London Borough of Barnet. This response is from NLWA, but you may also receive separate comments from London Borough of Barnet.
3. NLWA originally bought part of the Pinkham Way site with the intention that it would be used for waste facilities as part of its long term procurement plans for managing north London's waste, but the NLWA's long term procurement process ceased in September 2013. However, it is expected that the amount of waste that is generated in north London will grow in forthcoming years. From NLWA's modelling, the projections of increased waste are based upon growth in disposable household income (GDHI) and recovery in household spending, together with a 'time variable' to account for what it is speculated would be the cumulative effect of waste prevention and minimisation measures (e.g. product light-weighting). However, it is also anticipated that there will be a growing population and increasing numbers of households in the area. Haringey's Local Plan, Alterations to

Strategic Policies 2011-2026, February 2015 notes that the Draft Further Alterations to the London Plan significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum – an 83% increase, which will increase overall waste arisings. Accordingly NLWA anticipates that there will be increasing pressure to find suitable land for new waste management facilities and to retain the land that is suitable. The Pinkham Way site remains an asset for NLWA due to its strategic location and planning designation as an employment site. The following comments refer to the various sections of the site description in the proposed sites allocation document.

4. Ownership

NLWA suggests that the wording here is amended to say 'Two' public freeholds, rather than 'Multiple' public freeholds as this more accurately reflects the ownership position at the current time.

5. Proposed Site Allocation

Given the Borough's stated comment under 'Site Requirements' that 'employment is the preferred use on this site' NLWA recommends that the proposed site allocation text is altered from 'The site is borough Grade 1 SINC, and for employment uses' to 'The site's preferred use is for employment, but it is also designated as a Borough Grade 1 SINC'. NLWA considers this change would more accurately reflect the balance of interests presented in the draft DPD.

6. Site Requirements

6.1 NLWA notes before any development is granted planning permission, that a Biodiversity Study will be carried out to identify how the designated SINC can be enhanced by the development, in line with policy SP13: Open Space and Biodiversity and any future DMD PD (Development Management Development Planning Document¹) policy relating to this issue. NLWA has no comments upon this statement.

¹ Corrected from 'Development Management Document Planning Development' in the original sent.

6.2 NLWA supports the statement that 'employment is the preferred use on this site' which is detailed in bullet point two and acknowledges bullet point three which states that in line with policy 7.19 of the London Plan that, 'if appropriate development may be required to improve access to the SINC'. However, London Borough of Haringey's Open Space and Biodiversity Study Final Report, October 2014 states that 'relative to many London Boroughs, Haringey is well endowed with open space, which makes up more than 25% of its total area' and given that the site has dual designation for both employment use and as a Borough Grade 1 SINC, NLWA considers it would be helpful to caveat bullet point three of the Site Requirements section. It would be preferable in our view to recognise the preference for employment use as the first choice for the site and then the points about ensuring achievement of biodiversity action plan (BAP) targets through improving access to the SINC should be secondary. NLWA additionally recommends that a note is added which confirms that the site has no public access at present and is adjacent to Hollickwood Park - a Borough Grade 2 SINC which is accessible.

6.3 The Pinkham Way site has some extreme changes in height, has stands of invasive, including poisonous, plants and additionally has areas of contamination. In our view it is not suitable for public access. NLWA considers that the best prospects would be for parts of the site to be developed for employment (in our view in particular for wastes management purposes) whilst preserving other parts (particularly the perimeter trees) in as undisturbed a way as possible, but still without public access for both ecological and health and safety reasons.

6.4 Finally to emphasise the site's suitability for employment use, it is close to the A406 north circular road, protected from housing by Muswell Hill golf course to the south, the railway line to the east, the A406 to the north and Hollickwood Park to the west. This separation makes the site particularly well suited for development into employment use.

7. Development Guidelines

7.1 NLWA recommends that LB Haringey clarifies bullet point four which states that the area in the vicinity of the north eastern corner of the site (along the rail line) is an ecological corridor, so as to confirm that it is just the National Rail land, i.e. the railway embankment (which is outside of NLWA's ownership), that is a designated ecological corridor.

7.2 The proposal that pedestrian and cycling connectivity through the site should be optimised as part of the design of any new development is opposed by NLWA as such access would severely compromise the development of the site for employment use. If the site was used for waste management purposes for example, then health and safety constraints would be most likely to prevent pedestrian and cycling access. Any such route through the site would in any case have to be so fenced in (for health and safety reasons) as to be at best an unwelcoming route, and at worst an unsafe route from a crime perspective.

7.3 Secondly the existing public access along the footpath adjacent to the public highway which runs from the north of Alexandra Road then eastwards to the Pinkham Way roundabout seems to be of a similar distance between Alexandra Road and the Pinkham Way roundabout to the proposed route through the Pinkham Way site which is shown on the site diagram. The proposed route also crosses Hollickwood Park which has gates which are locked at night and therefore the benefits to pedestrians and cyclists would be minimal relative to simply walking / cycling around the site on existing public highway.

7.4 NLWA recommends that the yellow lines on the diagram of the site are removed where they show access through the site as these lines imply that access via these routes has been agreed with the site owners and it has not. Figure 2.4 of London Borough of Haringey's Open Space and Biodiversity Study Final Report 2014 shows an advisory route near to the Pinkham Way site, but it is only shown running from the north side of the A406 north circular road to the roundabout by Pinkham Way, not crossing the site. The site is not accessible at present to members of the public, (it is securely fenced off), so any suggestion of such accessibility, e.g. by the inclusion of lines showing public access routes through the site, should be removed.

7.5 Bullet point eight notes that 'mitigation of and improvement to local air quality and noise pollution should be made on this site'. NLWA considers that it is difficult to see how local air quality and noise pollution could be improved if development of any kind is to be allowed on the site, given that it is currently an undeveloped parcel of land. NLWA suggests that this comment is inconsistent with the borough's statement that 'employment is the preferred use on this site'. In addition, Pinkham Way is adjacent to the A406 north circular road, so it is difficult to reconcile a requirement on a site owner or developer of the site to make improvements to the existing position when the majority of current air pollution and noise is coming from the adjacent road, rather than the site. NLWA recommends that the phrase about mitigation of and improvement to local air quality and noise pollution should be removed.

8. Other parts of the DPD

8.1 As noted in paragraph 2, NLWA would like to make a brief comment about the Crossrail 2 proposals which are referenced in the consultation draft DPD. NLWA has a Re-use and Recycling Centre (RRC) at Western Road in Wood Green. The RRC is almost completely within the 400-800m radius from the proposed Alexandra Park Crossrail station (a very small part of the RRC appears to be within the 400m radius), and as such the draft DPD states that such sites will be scrutinised for how they can complement the introduction of Crossrail 2 in relation to design issues such as the provision of routes to and from the station. On the assumption that this scrutiny is only at the time of redevelopment NLWA recommends that LB Haringey should continue to take care that the redevelopment of the former Haringey Heartlands area including Clarendon Square should be conducive to the Western Road RRC being able to continue to serve local residents as it now does. NLWA would be pleased to be involved in any scrutiny for how the site may be able to complement the introduction of Crossrail 2 in relation to design issues such as the provision of routes to and from the station so that all health and safety and operational considerations can be fully taken into account.

8.2 NLWA has not been able to review all other parts of the DPD for potential cross-references, but requests that LB Haringey ensures all other such parts are made consistent with the above comments and requested changes.

8.3 For example, the introductory text on waste facilities (p.11) could refer to the fact that the Pinkham Way site was a significant part of the former submission draft NLWP's achievement of the London Plan's self-sufficiency for waste apportionment targets/obligations.

I trust that NLWA's comments are clear, relevant and helpful, but if you have any questions please do not hesitate to contact me.

Yours sincerely,



Andrew Lappage
Head of Operations

