
Subject	NLWA's Comments on PWA Representations to Haringey Site Allocations DPD Consultation		
Date	5 June 2015	Job No/Ref	235271-05

1 Introduction

LB Haringey contacted the North London Waste Authority (NLWA) on 21 May 2015 and invited NLWA to comment on the Pinkham Way Alliance (PWA) submission to the Site Allocations DPD consultation. NLWA understands that this is reciprocal, and that PWA has been invited to comment on the NLWA's formal submission.

NLWA submitted their initial thoughts to LB Haringey on 28 May 2015. This document contains NLWA's further comments to assist LB Haringey.

The note responds to the points set out in the representations submitted by the PWA, comprising:

- PWA Representations on the Site Allocations DPD Consultation Document February 2015 (March 2015);
- Preliminary Ecological Appraisal Report (2013);
- Preliminary Invertebrate Survey 2014-2015 (2015);
- PWA Pinkham Way Strategic Risk Assessment (2015);
- Site Constraint Plans 1, 2 and 3 (2015);
- Haringey Green Corridor Aerial View (2015).

Where appropriate the LB Haringey Site Allocations DPD documents, including supporting evidence base, are referenced. These documents include:

- Site Allocations DPD Reg 18 Consultation Document (2015)
- Workspace Viability Assessment (December 2014)
- Site Allocation Viability Assessment (February 2015)
- Haringey Employment Land Study (2015)
- Local Plan: Strategic Policies 2013 – 2016 (2013)
- Unitary Development Plan - saved policies (2013)
- Haringey Biodiversity Action Plan (2009)
- Haringey Open Space and Biodiversity Study (2015)

1.1 Background

The NLWA and London Borough of Barnet own the site known as Pinkham Way. The NLWA owns the majority of the site. LB Haringey is familiar with the site's history and the NLWA's likely use of the site for waste management, and as such this is not repeated here.

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NLWA has submitted representations to the Site Allocations DPD, which support retention of the site allocation for employment and acknowledge that any development would need to mitigate any likely significant effects on the Borough Grade I SINC.

1.2 Overview

The note is broken down into three sections – employment and viability, site suitability, and biodiversity and ecological value – following a similar structure to the PWA Representations document. In relation to these themes, it is concluded:

- **Employment and Viability:** There is negligible evidence to suggest the removal of employment status of the site and it is recommended that the Pinkham Way site remains designated as a Local Employment Area. The development of the site for owner occupier use, as would be the case if developed by NLWA for waste management uses, presents a viability picture different to that which would be faced by a speculative developer.
- **Site Suitability:** The majority of the site constraints identified can be overcome with a suitable design response.
- **Ecology designation:** The ecological designation is not inconsistent with employment designation and there are a range of options to deliver development that maintains biodiversity value.

NLWA strongly recommend that the Pinkham Way site remains designated as a Local Employment Area to ensure that the Borough maintains a supply of employment land to meet the needs of different employment uses. This upholds the recommendation set out in the Atkins Employment Land Study that the existing employment designation of the site should remain. The Atkins study states that the continuation of this designation should be subject to the results of a detailed development viability assessment. The NLWA do not believe that viability is a factor which currently prevents the delivery of the site for employment development.

2 Employment and Viability

2.1 Employment Site Allocation

The Pinkham Way site is currently designated as a Local Employment Area (LEA) within the Local Plan: Strategic Policies 2013 – 2016 (adopted March 2013) and a Defined Employment Area (DEA) and Employment Location (EL) within the Unitary Development Plan's saved policies (March 2013).

The site is also designated as a Draft Site Allocation within the Site Allocations DPD Reg 18 Consultation Document (February 2015) where it is listed as a Local Employment Area (LEA).

2.2 PWA Submission

The PWA submission to the Site Allocations DPD consultation concludes that “*the Pinkham Way site is unsuitable for development, that the employment designation should be removed*” (Paragraph

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2.5 of the PWA Representations). The PWA representations are focused on its review of three documents prepared to support the DPD:

- Workspace Viability Assessment (GVA, December 2014);
- Site Allocation Viability Assessment (GVA, February 2015);
- Haringey Employment Land Study (Atkins, 2015).

2.3 Workspace Viability Assessment

Reference is made by the PWA to the Workspace Viability Assessment (GVA, December 2014).

Paragraph 1.2 of the Assessment states *“This study is not intended to replace the employment land review, rather it provides a more detailed assessment of the opportunity to deliver particular small business workspace types within a number of sites identified by LB Haringey officers. It seeks to establish, based on this sample, a broader set of principles to direct future workspace delivery within existing employment areas.”*

The study considers how the value of land across the borough affects potential workspace delivery and how employment can be intensified in a viable way (Paragraph 1.4). It sets a baseline understanding of the existing opportunities for small business workspaces on specific sites in Haringey along with setting a viability position of these sites. This is set within the context of the wider market for a range of workspaces in London, with a particular focus of multi-tenant spaces and those focused on new and emerging small businesses (Paragraph 1.7). Chapter 2 of the study provides a high level overview of the small workspace market context in London noting:

- Small business workspaces have their origins in creative industries and have now evolved into a range of types with more specialised spaces involving different industries, operators and sectors;
- There is a driving need for smaller workspaces in locations accessible to major corporate activity;
- An increase in creative, technology and design activity has resulted in a new wave of business and entrepreneurs that are seeking and favouring ‘non-traditional’ spaces; and
- Transport accessibility is a key factor that is likely to impact workspace growth in outer London - workspaces located here are usually located in area with the highest PTAL ratings.

Paragraph 3.10 of the Workspace Viability Assessment notes that the report does: *“not present an assessment of the general commercial space typologies of B1a office and B1c/B2 industrial premises, which are the dealt with within the Employment Land Review. The market for these types of space is well established with the core site drivers being linked to accessibility and the availability of good quality premises”*.

The PWA representations state that *“there was no mention of any work’s having been done on the Pinkham Way; indeed any mention of the site is omitted”* (Paragraph 3.2) and note *“PWA can only assume that the negative remarks in the Workspace Assessment mean either a) that the idea of assessing the site for mixed use was too impractical to be worth pursuing, or b) that an assessment was done but was too damning to be published”* (Paragraph 3.3).

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The Workspace Viability Assessment is clear that it is not reviewing all types of employment floorspace and that it is focussed on the 'workspace' rather than B1a office and B1c/B2 industrial premises. On this basis it is understood that the sites included in the report have been selected for assessment where they are considered (by the Council) to be appropriate for workspace. Furthermore, Paragraph 6.4 of the Workspace Viability Assessment notes that Pinkham Way has "*limited workspace drivers to support future workspace delivery*" setting out the site would not be suitable for successful delivery of workspace. However, the report does not state that the Pinkham Way site is not suitable for other employment uses.

2.4 Site Allocation Viability Assessment

Reference is made by the PWA (see paragraph 3.2) to the Site Allocation Viability Assessment (GVA, February 2015). The representation queries the sites that have been assessed and the lack of information on the Pinkham Way site.

The Site Allocation Viability Assessment sets out a high-level assessment of 12 residential led sites within LB Haringey, to provide guidance on whether the proposed quantum and mix of floor-space indicates a viable scheme based on the current understanding of development capacity and site constraints (Paragraph 1.5). It is important to note that only 12 of the 62 sites contained in the Site Allocations DPD Consultation Document (LB Haringey, February 2015) have been considered within the Assessment, all of which are residential led sites. The Pinkham Way site did not form one of the 12 assessed sites and has not been included in the document as it is not a residential led development.

2.5 Employment Land Study

Reference is made by the PWA to the Employment Land Study (Atkins, 2015) where it references the Pinkham Way site (paragraphs 5.40-5.43). The Atkins study updates key elements of the 2012 Haringey Employment Study. The update provides up to date analysis of the Borough's overall employment land supply as well as an assessment of the likely demand for employment land and premises up to 2031. It also sets out recent changes to the strategic policy context for economic development and their implications for the supply and demand for employment land in Haringey.

2.5.1 Development Viability

Paragraph 3.6 of the PWA representations make direct reference to the Employment Land Study which sets out that the Pinkham Way site has been "*vacant / derelict for many years reflecting the difficulties in bringing it forward for development*" (Paragraph 5.40). They also make reference to Paragraph 5.42 of the Study which "*recommends a study should be undertaken to determine the feasibility and viability of the site for redevelopment for employment use*" and as the site has not yet been developed, make reference to the "*possibility that some form of cross subsidy will be required in order to bring the land forward for development*" (Paragraph 3.9 of the PWA representations).

The PWA query the availability of cross subsidy and reference the lack of assessment in the viability studies. The representation states "*cross subsidy therefore should no longer be considered an option for the [Pinkham Way] site.*"

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The Atkins study simply states that cross subsidy may be required to make development for employment viable. However, the report does not state that cross subsidy is required and as such the point made in the representation is not relevant. Furthermore, no evidence has been provided by the PWA to illustrate why commercial employment development on the site would not be viable inclusive of site enabling costs. The development of the site for owner occupier use, as would be the case if developed by NLWA (with its statutory duties), presents a viability picture different to that which would be faced by a speculative developer. NLWA would not seek to develop the site through the form of a cross-subsidy, so although viability is always a consideration in the delivery of development proposals it is not felt that viability is an issue that prevents delivery of this site.

As part of its former procurement process to deliver new waste management facilities for north London, the NLWA explored proposals for waste use of the Pinkham Way site. The proposals were put on hold when the procurement process was abandoned (for reasons unrelated to the Pinkham Way site), but it is worth noting that the NLWA did not consider development of the site for waste management to be unviable.

2.5.2 Site Access

The Atkins Study notes:

“The site is located immediately adjacent to the North Circular Road (A406) and is accessed directly from this major arterial route via a junction with the B550 approximately 200 metres to the west (Paragraph 5.39)”.

The PWA disputes this description of access to the site noting *“there is no ‘direct access’ to the ‘major arterial road’*” (Paragraph 3.11 of the Representations).

The site’s proximity to the A406 which forms part of the strategic trunk road network has been a key factor for the NLWA in assessing the suitability of the site for waste use, and was also a criterion that was used by the NLWP in identifying and assessing potential new sites.

Vehicular access to the site exists via the existing roundabout at the junction of Pegasus Way / Orion Road, which is accessed from Atlas Road. These access roads to and from the site are non-residential slip-roads off a major dual carriageway to a site that is immediately adjacent to that dual carriageway.

The Atkins Study also notes:

“The site does not appear to be an attractive B1 location. It is not close to any London Underground stations and the nearest railway station (New Southgate) is approximately 15 minutes away on foot (Paragraph 5.41)”.

The site has not been promoted as suitable for Class B1 development. As outlined above it has a role to play in meeting the need for other employment uses.

The site is readily accessible by car, foot and bicycle, train, and bus:

- Vehicular access to and from the site is achieved from Pegasus Way and Orion Road.

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- Pedestrian routes are available on the surrounding street network and a footbridge, located approximately 150m to the west of the site, provides a pedestrian connection between Orion Road and Atlas Road across the A406.
- New Southgate railway station is approximately 15 minutes (and 0.5km) away on foot and Arnos Grove Underground Station and Bounds Green Underground Station are approximately 1km away on foot.
- The nearest bus service to the site operates along the A406 (route 232) with stops located immediately to the west of the Pegasus Way bridge. Additional bus services (routes 43, 134 and 234) operate on Colney Hatch Lane with stops some 900m west of the site, and on Station Road / Bounds Green Road (route 221) with stops some 950m east of the site. National Rail services are available at New Southgate station which is approximately 900m north of the site.

2.5.3 Preserving Land for Waste Uses

Paragraph 3.15 of the PWA representations note “*There is no such current evidence on which to base any such assumptions for the Pinkham Way site*” in relation to the suitability of the site for waste.

The need to accommodate waste use in particular is reinforced by Policy 5.17 F Waste Capacity of the London Plan 2015 which states: “*Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. Boroughs may wish to collaborate by pooling their apportionment requirements.*” The Policy also supports the improvement of “*London’s net self-sufficiency through reducing the proportion of waste exported from the capital over time*”.

This process is to take place in the form of the North London Waste Plan for which consultation on a draft plan is due in the Summer/Autumn of 2015. In the previous submission draft of the North London Waste Plan the site was allocated for waste use, and it would be premature to assume a different outcome at this stage.

What is relevant to acknowledge in response to the PWA representations is that municipal waste management in particular is an employment use that benefits from proximity to the areas served. Within North London there are limited site options available to offer proximity to the population served.

3 Suitability of the Site

The NLWA has reviewed Section 4 of the representations made by the PWA and the associated documents they make reference to (Risk Assessment, Site Constraints Plans 1, 2 and 3 and Haringey Green Corridor Aerial view). Set out below is a response to the key issues highlighted by the PWA. Firstly it is relevant to note that the PWA is quoting the NLWA’s own document prepared for the site, specifically a scoping report that was prepared to agree the scope of an environmental impact assessment for the site. Any application for development would be likely to require an environmental impact assessment and the findings of that process would inform design

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development and mitigation measures to address site constraints. The NLWA note that many of the site constraints identified can be overcome with a suitable design response.

Ground levels: The difference in ground levels on the site does not make the site unviable/unsuitable for development and can be overcome with a suitable design response. Mitigation could include the re-use of on-site materials to re-grade parts of the site would keep the import/export of soil to a minimum. For waste related uses, some variations in height can be helpful as bunkers would have to be provided for waste delivered to the site.

Land contamination: Historically the site was a sewage treatment works and subsequently it was used for landfill by the London Borough of Barnet. The remnants of the sewage treatment works which closed in the 1960s are visible at the northern end of the site. There is also evidence of uncontrolled fly tipping following closure of the sewage treatment works. This includes abandoned cars, empty oil drums, tyres and electrical appliances which are found across the site. The existing land contamination precludes the use of the site as a public amenity unless remediation works are undertaken. Ground remediation works would need to take place prior to any development on the site. Remediation is undertaken on many sites as part of development and there is a large body of evidence which sets out best practice. Any development proposals for the site would need to demonstrate how remediation would be achieved.

Existing culvert: A culvert has been identified as running across the site on an approximately south east to north west axis. The culvert is in very poor condition and shows evidence of blockages and collapse. The culvert is fully covered and designed to take runoff from an open culvert on Muswell Hill Golf Course down into Bounds Green Brook which runs along the north side of the A406. The existing culvert does not prevent or constrain development of the site and could be incorporated into scheme proposals.

Impact to Pinkham Way SINC: Refer to Section 4 for further detail on the perceived impact to the Pinkham Way SINC.

Impact on adjacent SINC and MOL: Refer to Section 4 for further detail on the perceived impact on the adjacent SINC and MOL.

Site Access (strategic road network and public transport): The site's proximity to the A406 which forms part of the strategic trunk road network has been a key factor for the NLWA in assessing the suitability of the site for waste use. Furthermore, the site is accessible by car, foot and bicycle, train, and bus. Refer to Section 2.3.3 for further detail on site access.

Employment Benefit: There are no current development proposals for the site so employment figures are not known. Employment land is required for a range of employment functions, such as for sites for industrial, warehousing and waste to ensure that there is opportunity for a range of employment uses. Any planning application for the site would consider likely employment generation by the proposed development.

Air Quality: Air quality would be assessed as part of an Environmental Impact Assessment submitted with a planning application.

Noise Pollution: The impact of noise can be mitigated through good design. Through development of proposals for the site it would be possible to locate the waste facility closest to existing noise

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sources and changes of levels and bunding within the site can assist in minimising any noise associated with operation of the site.

4 Biodiversity and Ecological Value

The NLWA has reviewed Section 5 of the representations made by the PWA and sets out below a response to each of the points.

4.1 Changing Emphasis to Policy

Paragraphs 5.1 to 5.2: NLWA's position upon purchasing the site does not have a bearing on the independent assessment of the ecological value of the site and its feasibility for development.

Paragraphs 5.3 to 5.17: Planning policy and biodiversity guidelines, including those described above, would inform the design of the future development of the site. It is recognised that some habitats would need to be cleared to facilitate a level of development, meaning that it would not be possible to retain all areas of the SINC. However, in order to gain planning permission, it would be necessary to provide an overall net gain in biodiversity value, where possible, in accordance with the National Planning Policy Framework¹ (NPPF), appropriately balanced against employment needs given the dual designation of the site. Any future proposals for the site would need to provide the relevant ecological baseline and assessment, following the principles of the mitigation hierarchy, in order to inform a planning decision.

While not questioning the existing ecological value of the site, a number of the habitat areas present are in sub-optimal condition that could be improved upon through active management. Therefore, the delivery of net gain, as part of a planning application, could be achieved through a combination of new habitat creation, plus enhancements to and management of retained habitat areas, together with the provision of off-site offsetting, if required to address additional residual impacts. As outlined in a Scoping Report submitted to LB Haringey in March 2011 for the site, "*consultation with Haringey Council is required in order to agree appropriate on-site or off-site mitigation options, to offset the loss of all or part of this non-statutory site.*" These combined measures would, in part, aim to support notable plant species for which the SINC is designated.

4.2 Haringey Open Space and Biodiversity Study (Land Use Consultants, 2015)

Paragraph 5.18: The Pinkham Way site is a SINC 1 Borough Importance.

Paragraphs 5.19 to 5.23: Ecological connectivity and fragmentation could be addressed by a planning application by maintaining and enhancing the ecological corridor along the northeast boundary. Any future proposals impacting upon connectivity and/or causing fragmentation would need to address this issue. The protection and enhancement of SINCs, as well as the connectivity between them, is not for the NLWA to comment upon.

¹ Department for Communities and Local Government, (2012); 'National Planning Policy Framework.

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No criteria for ecological value is provided in the methodology for the biodiversity assessment within the Haringey Open Space and Biodiversity Study, with this evaluation being the surveyor's opinion, with no means for comparison. The site visit was completed in two hours and comprised a walkover of the site. An assessment of ecological value, such that would be provided in an ecology chapter of an Environmental Statement to support a planning application, would be based on extensive survey work, including habitat and protected species surveys, and a detailed desk based review. While it is considered that the methodology for the biodiversity assessment is appropriate for the study in question, that is to audit multiple SINC's and identify any changes to their status, it is important that this statement is not taken out of context or given more weight than was intended.

SINC's are protected through planning policy, primarily the NPPF, London Plan² and Haringey's Local Plan. This policy framework requires adherence to planning policy as part of the planning process, such that appropriate measures would need to be implemented as part of a future development to ensure compliance with these policies. Haringey's Local Plan states:

- *“All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its:*
 - *Contribution to wildlife and ecological habitats and, where possible, include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities;*
 - *Protection, management and maintenance of existing trees and the planting of new trees where appropriate; and*
 - *Protection, enhancement and creation of Sites of Importance for Nature Conservation (SINC's)...”.*

Paragraph 5.24: It has not been made clear why the ongoing treatment of invasive species would be contentious. It is in the interests of all parties involved to treat invasive species, to ensure compliance with the Wildlife and Countryside Act 1981³ (as amended) concerning the spread of invasive species and avoid risks associated with contamination of the site post-development and damage to man-made structures. NLWA therefore continues to treat them.

Paragraphs 5.25 to 5.26: As indicated previously, planning policies require the protection of SINC's, which would need to be addressed within plans for the future development of the site. Detailed design review would need to identify opportunities to support notable species and habitats associated with the SINC as part of the development, with provision of offsite enhancements and/or habitat creation where applicable.

Paragraph 5.27: The commitment of residents to promote biodiversity has been recognised, but it is not currently feasible to undertake such work at the site. There are many local conservation initiatives that would welcome volunteers.

Paragraphs 5.28 to 5.33: As well as being wasteland priority habitat under the London BAP, the site falls under the criteria of Open Mosaic Habitats on Previously Developed Land under the

² Greater London Authority, (2015); 'The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations since 2011.'

³ Her Majesties Stationary Office (HMSO), (1981); 'Wildlife and Countryside Act 1981.'

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former UK Biodiversity Action Plan (BAP)⁴ and Section 41 list⁵. The UK BAP is relevant in the context of Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006⁶, meaning that Priority Species and Habitats are material considerations in planning. Species listed on the Section 41 list are of principal importance in conserving biodiversity in England, as required under Section 41 of the NERC Act 2006⁷. Section 41 requires the Secretary of State to further the conservation of the living organisms and types of habitat included in any list published under this section. Wastelands are recognised to be of conservation importance and are protected.

There are numerous case studies of developments that have recognised the value of brownfield land for a number of key species, including black redstart *Phoenicurus ochruros*, and have incorporated features such as green and brown roofs, including those at Deptford Creek. The framework of legislation does not prohibit development, but rather provides a mechanism for ensuring adequate mitigation and compensation is incorporated into developments. This is deemed appropriate, given the demands for land, for housing in particular, and the comparable value of greenfield sites, including for wildlife and biodiversity. The designation of the site as a SINC and presence of former UK BAP habitat does not necessarily mean that the site is wholly unsuitable for development. Survey work has identified important habitats at the site, but natural succession and the spread of invasive species means that much of the site is in sub-optimal condition. As a result of this succession, the wasteland habitat component of the site is now relatively restricted in extent, with much of the area dominated by grassland and secondary woodland growth. Therefore, the priority for development would be to protect, but also to restore and enhance important ecological features, to maximise their value and compensate for an overall reduction in habitat area.

4.3 The Preliminary Ecological Appraisal 2013

Paragraphs 5.34 to 5.41: It is recognised that these habitats and species have been recorded at the site; such findings are in line with previous surveys commissioned at the site. However, it is considered that a future development could mitigate for potential effects on these features as part of the landscape strategy and where appropriate potential off-site compensation. Further survey work would be needed to clarify precise ecological requirements. This work would be carried out in conjunction with detailed design, to determine evolving opportunities and constraints.

Development of the site would provide an opportunity to create suitable habitat for notable plant species for which the site is designated (bee orchid and golden dock). The same applies regarding the control of invasive species, tall ruderal vegetation and succession to woodland and scrub. Development would prioritise important habitats and those supporting notable and protected species. As previously stated, at least the majority of mature trees, some of which have TPOs, located around the periphery of the site would be retained and protected as part of a future development.

⁴ UK Biodiversity Partnership, (2011); 'UK Biodiversity Action Plan.' Available at: <http://jncc.defra.gov.uk/page-5705>.

⁵ Secretary of State, (2010); 'Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 - Habitats and Species of Principal Importance in England.'

⁶ HMSO, (2006); 'Natural Environment and Rural Communities Act.'

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It is recognised that there are other SINCS within 2km of the site and that the site promotes connectivity. Future development of the site would maintain and enhance the ecological corridor, as previously stated. The other designated sites would be considered as part of the review of baseline conditions, including an assessment of potential effects.

4.4 The Invertebrate Study February 2014-2015

Paragraphs 5.42 to 5.51: It is agreed that further invertebrate survey work should be carried out, considering all habitats within the site that have the potential to support notable invertebrate assemblages, as well as other species groups. Wasteland habitats typically support diverse invertebrate assemblages and completion of such work would inform the landscape strategy for the site. Such work would be reflected in any ecological assessment to support a planning application.

Consideration of lichens and mosses in the statement from the Open Mosaic Habitat Survey Handbook does not directly imply that the site is important for these groups, or that survey work should be carried out. However, the requirement for such work would be considered as part of a package of surveys to inform a future planning application.

4.5 Nature Conservation of the Site

Paragraphs 5.52 to 5.54: The need for open space is recognised. However, there are other competing needs for the borough, which have been considered and have informed designation of the site for employment use. There is reference to development in LB Enfield and in bringing forward those proposals the Council should have considered its open space requirements, and it should not be assumed that the Pinkham Way site is required. Any future development proposals for Crossrail and associated or related development would also have to set out how any open space requirements are to be met and would be objectively assessed as part of the process for securing consents for those developments.

Paragraphs 5.57 to 5.58: As highlighted previously, such endeavours would be welcomed by many conservation groups and such work could be focussed off-site, potentially as part of any additional provisions made by the future development of the site. However, the PWA is setting out proposals for land over which it has no control and which are tangential to the issue of the site's designation in the Plan.

Paragraph 5.59: As previously stated the PWA is setting out proposals for a site over which it has no control.

Paragraph 5.60: A Flood Risk Assessment would be carried out to inform a future planning application for the site, which would consider options for flood alleviation.

Paragraph 5.61: The option to de-culvert the watercourse would be considered as part of a future planning application in line with the Environment Agency's guidelines.