

Representations on behalf of London Borough of Barnet in respect of former Friern Barnet Sewage Works.

We are instructed by the London Borough of Barnet in respect of their land ownership at the former sewage works. The sewage works are partially owned by the Council and partially by the North London Waste Authority. The Council own broadly the south western half of the wider site with future potential access from the north.

Haringey Council has published the 'Haringey's Local Plan Preferred Option Site Allocations DPD Consultation Document' – February 2015. This follows consultation on the earlier document 'Reg 18 Consultation Document' in January 2014. This earlier document identified the subject site as site MH3 and the draft allocation states "Subject to the evidence provided in the Open Space and Biodiversity Review, Employment Land Review, and North London Waste Plan, the existing designations will be reviewed".

The supporting text states "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. At present the site is not in active use and there is no access to the public. It has been retained in employment land designation. It currently has dual designation as a Local Employment Area and a Site of Important Nature Conservation (Borough Grade I)".

In this respect the earlier document was dependent upon the results of other elements of Haringey's evidence base that at that stage had not been completed.

The current document now benefits from the completion of those documents with the Employment Land Study dated February 2015 and Open Space and Biodiversity Review.

The consultation document under draft Policy SA2 deals with Changes to Designated Employment Areas. The supporting text advises:

The hierarchy of Designated Employment Areas is set out in Local Plan policy SP 8. This document, informed by evidence in the Employment Land Review, and Viability Study, makes the following changes and/or clarifications to existing designations. In respect of the subject site it states:

"LEA 6 (Friern Barnet Sewage Works): Designated as Local Employment Area: Employment Land (see site SA 49)"

Accordingly under SA52 Pinkham Way now proposes the following designation:

“The site is Borough Grade 1 SINC, and for employment uses”.

It will be noted here that the reference to the site under draft Policy SA2 is incorrect in that it refers to site SA49 that is Cross Lane. It should read SA52 Pinkham Way.

This proposed designation is based upon the Councils Employment Land Study 2015 undertaken for the Council by Atkins. The site is referenced as Employment Land as DEA6 - Friern Barnet Sewage Works, N10. The assessment of the site is set out at paragraphs 5.38-5.43 of the report.

Under the heading of ‘Opportunities for change’ the text states:

5.40. The site has been vacant / derelict for many years reflecting the difficulties in bringing it forward for development. It appears unlikely that this is going to change in the short to medium term as there are various factors affecting the site’s prospects of being developed (such as the site’s contamination and the corresponding land remediation costs).

5.41. Given that both the Experian and trend-based employment projections indicate that future employment growth in Haringey will be primarily in office-based sectors, 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. Taking the above into account along with the site’s land contamination issues and its long history being vacant / derelict it does not appear to be likely to be developed for employment use in the near future.

5.42. A study should be undertaken to determine the feasibility and viability of the site for re-development for employment use. It is possible that employment-led development could be unfeasible because of land remediation costs. This raises the possibility that some form of cross subsidy will be required in order to bring the land forward for development.

5.43. Subject to the findings of a detailed feasibility assessment, it is recommended that the site should be retained as employment land, if it is assessed to be viable for employment development once nature conservation issues have been suitably mitigated. If unviable, cross subsidy for development could be considered to deliver employment functions.

Therefore whilst the proposal is to retain the employment designation this is not confirmed with certainty as the study recommended that a further site specific study be

undertaken. However it is also recognised that to deliver employment development on part of the site that this may require a 'cross subsidy' from other uses.

Under the heading 'Employment site designation amendments' Table 5-9 and the recommended designation column this suggests no change with a footnote that states "Subject to the results of a detailed development viability assessment".

The Council has also produced a 'Sustainability Appraisal of Site Allocations' document that was written by URS. Table 10.1 considers 'Potentially suitable uses at each of the preferred sites, established through application of a systematic methodology'. In respect of the subject site (SA52) the site was considered as having potential for employment, no potential for open space or town centre uses, but a question mark in the housing and community columns of the table. However the rest of the document doesn't discuss these two uses, although it states under flood risk "Flood risk is an issue at Pinkham Way (SA 52), where there is residual 1 in 100 year + Climate change flood risk from Bounds Green Brook to the north of the site. Policy is set to require that more vulnerable uses are kept from this part of the site in line with the sequential test".

The EA Flood Map only indicates that part of the wider site is part of Flood Zones 2 and 3 as shown on the extract below. This does not affect that part of the site owned by Barnet Council so this would not be an impediment to the development of all or part of their site for housing.

The Council has also produced an Open Space and Biodiversity Assessment undertaken by LUC and dated October 2014. Section 8 refers to the subject site as a 'Borough Grade II' site. SINC's are considered within the report if at risk, for upgrading or the designation of new SINC's. In respect of the remaining SINC's the text states "The remaining SINC's appeared to be correctly graded and although the site description of some sites differed from the descriptions provided the overall ecological resource was considered to be comparable.

Site Name	SINC Grade	Reason for designation	Discussion of current value	Recommendation
Former Friern Barnet Sewage Works	Borough	A typically diverse wasteland site, with a high botanical diversity. Several uncommon plants include bee orchid (<i>Ophrys apifera</i>). The nationally scarce golden dock (<i>Rumex maritimus</i>) has been recorded here in the recent past. There are also good lists of birds and invertebrates. The site is zoned for industrial development, redevelopment will take nature conservation into account. Some changes have been made to the site in the current LDP.	The woodland are dominated by sycamore with frequent ash and a variety of other species including willow, apple, crab apple and wild cherry. The scrub is formed mainly of hawthorn, blackthorn and bramble. There are large expanses of conifer which dominates the tall ruderal areas. The rough grassland and ephemeral areas are the most botanically diverse areas supporting a wide range of grasses and forbes.	No change in status

Appendix 7 provides a detailed assessment of the site.

The assessor's personal opinion is stated as:

Nature conservation value	
Nature conservation value (surveyor's personal opinion):	Mosaic of semi-natural woodland, scrub, tall ruderal vegetation, ephemeral habitats and rough grassland. This large unlit site has no public access and is therefore almost undisturbed. Making it a rare resource for Haringey. Of high ecological value

However in making this assessment it is not clear whether the assessors gained access to the site. It is noted at paragraph 8.11 of the study that "For certain sites (for example utility or rail land), even where direct access was not available, the site could be viewed through or over fencing, or from trains".

Barnet Council have commissioned Ecology Solutions to assess the site using a recent biodiversity survey undertaken by Capita.

The assessment, which is based on the findings of a suite of habitat and species surveys undertaken at the site, shows that whilst some areas within the site are of ecological value, not all of the site is of equal quality in terms of the biodiversity that it supports. As such in ecological terms, subject to the retention of the most biodiverse habitats and implementation of appropriate management to safeguard and enhance their value in the long term, it is considered that losses to areas of lower biodiversity may be fully offset, resulting in a net ecological benefit and enhancements over the existing situation.

On this basis therefore it is considered that the two policy considerations (for employment and for nature conservation) can be reconciled, and that an appropriately designed development may contribute towards both policy objectives.

Recommendation

Therefore whilst we support the employment designation of the site the designation should also reflect the potential for all or some of the site to be developed for housing.

CgMs Limited

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