

Freehold Community Association

Submission to Haringey's consultation on the Site Allocations Preferred Options DPD 2015 - Site SA52 Pinkham Way

Site Requirements

.... Before any development is granted planning permission, 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 DMDPD policy relating to this issue.

Para 114 NPPF : Local planning authorities should:

set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and

The Pinkham Way site forms an essential and integrated part of a green network running along the Bounds Green Brook valley (see attached). To the north of the brook the network encompasses the Glebe Lands open space, into the Coppets Wood nature reserve, along the open section of the brook and ends at Friern Bridge Park directly opposite Pinkham Way. To the south of the valley the network runs from the Coldfall Woods nature reserve, into the Islington Cemetery, onto the Coppets Road allotments, along the MOL land bounding the A406 taking in the Cromwell Road playing fields, onto Hollickwood Park and ultimately the Pinkham Way site. This network is then connected by the Pinkham Way site into the green network running south alongside the railway land and on to Alexandra Palace.

Much of the land in these networks is located within the London Borough of Barnet and yet there is no evidence that Haringey has acted with a strategic approach in assessing the wider impacts any development of Pinkham Way would have on these networks and biodiversity. They have therefore failed to comply with their duty under Section 40 of the Natural Environment and Rural Communities Act 2006.

.... Employment is the preferred use on this site, preliminary viability evidence suggests that a higher value use may be required in order to subsidise the delivery of employment and enhancement of the SINC.

Para 158 NPPF :

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

There is no evidence that Pinkham Way provides an achievable opportunity for employment. The existing Bounds Green Industrial Estate, located on the east side of the railway line from Pinkham Way, has a significant number of long term empty units and Enfield, as part of their regeneration of the New Southgate Area, have demolished industrial units to be replaced with housing. The obvious evidence required to maintain "Employment" use for Pinkham Way (first designated in 1998) is to robustly assess the environmental importance of the site in mitigating the effects of climate change, air pollution and flood risk against it's viability of ever

being suitable for any form of development that might provide limited employment opportunities. Evidence indicates that regeneration of the Bounds Green Industrial Estate would provide a far more viable planning objective for a deliverable employment opportunity than the destruction of a SINC.

.... Pursuant to policy 7.19 of the London Plan, if appropriate development may be required to improve access to the SINC.

Para 75 NPPF : "Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails."

The rights of way issue onto and across the Pinkham Way site was first raised with Haringey 1998 and again in 2012. Haringey's failure to act on the rights of way, established over 50 years use by the local community, undermines there compliance with Para 75 and if properly assessed would have a significant effect on any possible development.

Development Guidelines

.... Due to the nature of the site, it is not straightforward to nominate height guidelines. In view of the PTAL rating, heights are not expected to be more than 3-5 storey development (or equivalent), taking into account the topography of the site.

Para 170 NPPF : Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.

Current users of the Friern Bridge Park enjoy an uninterrupted view across the Pinkham Way site and up the railway green network to Alexandra Palace (see attached). This view is an important factor to the enjoyment and general environment of the park. Any development should be limited in height to maintain this view and the site levels reduced to ensure this. It was appropriate for Haringey to have carried out a landscape character assessment of the impact any development of Pinkham Way would have on the existing landscape but there is no evidence that this has been carried out. The height of a building is crucial in a decision as to possible employment units and uses and, based on evidence from an assessment, a definitive height limit should be set. This guideline is not robust.

.... There is residual 1 in 100 year + Climate change flood risk from Bounds Green Brook to the north of the site. Although the brook is to the north of the site, flood risk is present on the site. More vulnerable uses should therefore be kept from this part of the site in line with sequential test requirements.

Information from the Environment Agency clearly shows the presence of a defended area of fluvial flooding on the site from a 20 year (5%) storm event (see attached).

Haringey's site specific flood risk assessment fails to identify this flood area and therefore does not assess the predictable increase in the area by including other sources of flooding i.e. rainfall and ground water. This area of the site, including the required uplift for climate change, clearly identifies it as only being suitable for water compatible uses.

Haringey have failed to assess the strategic flood risk impacts development of Pinkham Way would have downstream of the site. In particular the increased risk of flooding to Barnet residents and Enfields proposals in their A406 Area Action Plan.

The sequential test is a precautionary test to ensure that land at the lowest risk of flooding or causing flooding elsewhere is bought forward for development before land at risk of flooding. The ranking of Pinkham Way in the required sequential test is vital evidence for potential developers and should be fully disclosed and referenced to the required site specific Sustainability Appraisal.

... The culverted stream should be examined for structural condition and blockages prior to any development.

The London Rivers Action Plan (see attached) has identified that development of Pinkham Way should secure the opening up of the culverted tributary, which bisects the site, to improve biodiversity, and public access.

The northern boundary of the site overlays an aquifer protection zone which will have significance to possible construction activity and development.

.... The area in the vicinity of the north eastern corner of the site (along the rail line) is an ecological corridor, and any development should serve to enhance this function.

As stated previously Pinkham Way is integral in joining the rail line corridor with the Bounds Green Brook ecological corridor.

.... Pedestrian and cycling connectivity through the site, including the existing estate on Alexandra Rd, to New Southgate station, which Crossrail 2 is proposed to be connected to, should be optimised as part of the design of any new development.

See comment on rights of way above

.... There may be potential to relocate some businesses from Regeneration Areas in other parts of the borough to improved premises at this location.

See comments on Bounds Green Industrial Estate above. This proposal would show no net gain to employment numbers.

.... This site has been nominated by the North London Waste Authority as a potential future waste site in the preparation of the North London Waste Plan.

The North London Waste Plan must comply with, and be in accordance with, the Plans and Policies of the individual LPA's. Waste development would only be suitable for sites designated by Haringey for Industrial development classes above those identified for Pinkham Way.

.... Studies should be undertaken to understand any contamination prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.

Between 1963 and 1980 Pinkham Way was used as an untreated waste landfill site finally being capped in 1980 with parks and highway waste. There is approximately 10m depth of contaminated debris located below the site and remediation will be extremely difficult and expensive. Any remediation work will require to reduce the risks to health and the environment particularly risks to the surrounding residential areas and water courses.

The independent monitoring of the air quality of the A406 alongside Pinkham Way has produced results of pollution levels double the national standards for air borne pollutants.

.... Proposed development must also take into account any land stability issues if relevant.

The site suffers from significant land stability issues due to the depth and nature of the contamination. Any building foundations will require extensive and expensive engineering works as well as ensuring protection of the aquifer zone and effective flood plain.

Commentary

To maintain the dual designation for Pinkham Way as a SINC and Employment site requires a far greater assessment and evidence base than that presented by Haringey. The Employment designation has been in place for nearly 30 years and in that time only one (withdrawn) planning application has been received and this would have required a redesignation of the site to Waste class Industrial use.

A significant amount of independent evidence has shown that Pinkham Way has a vital role to play in mitigating climate change, preventing flood risk and improving biodiversity, not only for Haringey but also the communities of Barnet and Enfield. It's cross boundary location makes it strategic for all three Boroughs and yet there is no evidence of cooperative working in assessing the strategic impacts any development of Pinkham Way would have. The site, as it exists today, provides a genuine opportunity, if properly assessed, to be used as a valuable flood prevention site, alleviating the predicted flood risk to the A406 and Bounds Green area from the Bounds Green and Pymmes Brooks and yet no such assessment has been made. Such a use would be fully compatible with it's SINC status and secure the future of the site as a green open space with no loss to it's biodiversity value.

Whilst there is evidence of Haringey, as a Lead Local flood risk authority, being part of a strategic flood risk group there is no evidence of strategic flood risk Planning cooperation between Haringey, Barnet and Enfield and evidence of this working must be shown in their annual Monitoring Report. No such evidence has been published.

The continuing lack of assessment evidence in relation to the designation of Pinkham as viable for Employment use is unsound and this designation should be removed.

Simon MacMull - Chairman
Freehold Community Association
27-03-15



Bounds Green Brook Green network

Landscape and view from Friern Bridge



Freehold Community Association - River Lee and Tribs Modelling Study 2014



Legend

- rivers_main_010k
- 1 in 2 (50%) Defended
- 1 in 5 (20%) Defended
- 1 in 10 (10%) Defended
- 1 in 20 (5%) Defended
- 1 in 50 (2%) Defended
- 1 in 100+20% (*CC) Defended

0 20 40 80 Meters

London Rivers Action Plan

Project name

Friern Barnet Former Sewage Works

Status

Concept Only

Catchment

Lee

Tributary

Bound Green Brook

OS grid reference

TQ2900291486 to TQ2892391798

Length (m) of enhancement(s)

300m

Type of enhancement(s)

Deculverting and naturalisation of ordinary water course and control of non native species

Reasons for enhancement(s)

Site is planned to be developed, mitigation for this development with nature conservation improvements as well as potentially providing amenity and recreational land for local population and education opportunities.

Key themes of enhancement(s)

Indicate by ticking one or more that apply.

- | | |
|--|---|
| <input checked="" type="checkbox"/> Sustainable urban regeneration/development | <input checked="" type="checkbox"/> Biodiversity/conservation |
| <input type="checkbox"/> Fisheries | <input checked="" type="checkbox"/> Education |
| <input checked="" type="checkbox"/> Recreational amenity (access to nature) | <input checked="" type="checkbox"/> Climate change |
| <input type="checkbox"/> Sustainable flood risk management | <input type="checkbox"/> Other (please state) |
-

Possible constraints

Contaminated land, location of the water course, invasive spp

Potential partnerships

Developers, London Borough of Haringey, EA

Approximate cost

Unknown

Possible funding

Development of land

Next steps

Planning permission negotiations, design objectives

Contact details

Primary contact: Ian Holt - London Borough of Haringey

Other
