

Mr Marc Dorfman
Manager
London Borough of Haringey
Urban Environment
Planning Policy & Development
Planning, Regeneration and Economic Planning
639 High Road, 1st floor
London N17

27th May 2009

Dear Mr Dorfman,

Former Friern Barnet Sewage Works, Pinkham Way, London N10

I am writing to seek the Council's advice as the Planning Authority on the potential use of the above site for development of a new residual waste management/treatment facility. The North London Authority (the 'Authority') has identified the Former Friern Barnet Sewage Works site (the 'Pinkham Way Site') as complementary site to the land the authority has identified for waste use at Hendon.

The Pinkham Way site is the only suitable site towards the western side of the NLWA area, and is in public ownership of London Borough of Barnet, one of the constituent boroughs of the NLWA. This gives the Authority the potential to acquire it without the need for compulsory purchase. The Authority is in discussions with London Borough of Barnet and is awaiting formal agreement to acquire an element of the site.

The overall site is approximately 16.82 acres (6.81ha) in size. Barnet wish to retain approximately 4 acres (1.62 ha) of the site for a depot. The Authority is seeking to acquire approximately 10 acres (4 ha). The Authority and Barnet have also agreed in principle to jointly develop a master plan for the site to underpin future planning applications that will be made by both parties separately should the site be acquired for waste purposes.

The Authority has undertaken detailed space planning for the site and it can accommodate a range of facilities should it be required although for the purposes of the Authority's reference project only a 70,000 tonnes per annum (tpa) Materials Recycling Facility (MRF) that is allocated to the site.

In addition to the space planning exercise undertaken for the site, the Authority has undertaken a planning appraisal exercise, the results of which has been made available to you back in January 2009. The planning appraisal for the site identifies the key aspects of the site which would affect the design and operation of the facility, reviews the main planning policies applicable to such a development on the site and concludes with a set of factors which would need to be addressed in any scheme for the site.

The key planning and environmental issues for the site and the Authority's proposed approach for addressing these issues should the site be acquired for waste facilities are set out below:

Compatibility with the adopted and emerging planning framework

The site is not specifically allocated for waste use in the adopted development plan, but it is within a designated employment area, which is compatible with the overall locational criteria for new waste developments set out in the adopted London Plan. The site is subject to little policy change in the emerging LDF. Its status as a designated employment area and a designated site of nature conservation interest will remain. We understand the Council has put the site forward for inclusion as a possible waste site in the emerging North London Waste Plan. The Authority proposed to take the following actions to support a waste use on the site:

- submit representations to Haringey and participate in the Examination in Public for the Core Strategy (currently under consultation) to seek for the waste policy elements to be strengthened and for references to be included in the Muswell Hill Area Assembly to provide for suitable waste treatment facilities.
- submit representations to the North London Waste Plan to promote the inclusion of the Pinkham Way site in the allocations for waste use.
- liaise with the GLA to confirm its support for the "locational criteria approach" to selecting sites for waste development, and also to ensure the GLA highlights to the local planning authority the need to ensure a sufficient supply of sites to meet the Mayor's Waste Strategy and London Plan commitments and targets applicable to north London.

Site Capacity, Ecology and Contamination

The detailed space planning exercise undertaken illustrates that the site can accommodate a range of facilities. However, the designation of the site as a Site of Borough Ecological Value will require the Authority to undertake a full ecological study. The Authority recognises that the need to identify areas which will enable the nature conservation value to be retained or enhanced will constrain the usable land available for waste development. The Authority also recognises that the design of the site and the assumptions for throughput will need to be set at a ceiling which will not create unacceptable impacts on the surrounding area and which will satisfy the relevant planning requirements for the site. The Authority also recognised the need to assess the issue of contamination as a result of its previous use.

LB Barnet has confirmed to the Authority that it has commissioned consultants to undertake contamination and ecological studies for the entire site and has agreed to share the full reports with the Authority in due course. The Authority will seek to ensure that any EIA proposed for the site identifies sufficient mitigation measures to deal with the ecology and contamination issues of the site.

Access and Traffic

Traffic capacity and access to Pinkham is very good, with direct access onto and off of the A406 North Circular. There is, however, no scope for other modes of transport to and from the site. The Authority proposed to mitigate this issue through two interrelated routes:

- demonstrate that the other potential sites in the area (notably the Hendon site) which do have sustainable transport mode potential are not available for development; and
- demonstrate that the Hendon rail-based WTS will provide a nearby rail-based transport option for disposal and/or distribution of the recyclate and other material streams produced at Pinkham Way.

In addition, the Authority proposes to address traffic issues through the following key actions:

- assessing traffic impacts at key junctions in the area and where necessary identifying infrastructure improvements and active traffic management measures to increase capacity at bottlenecks and reduce the risk of clumping of HGV traffic.
- agreeing the scope of the traffic assessment with the local authority, with particular reference to the junctions and highways to be assessed and the additional developments assumed to be completed by the assessment year (i.e. the year when the waste facility would be brought into use).

LB Barnet has advised that they are considering providing a slip road into the site. The Authority proposes to explore the benefits of this option further with Barnet as part of the proposed joint master plan for the site to underpin future planning applications.

Flood Risk

The site contains a small amount of land within Flood Zone 2, which indicates that drainage and flood mitigation will be relevant (to a limited extent) to the design and determination of the application. However, the proposed use is identified in guidance (PPS25) as appropriate for such a location. The proposed mitigation measures to be undertaken by the Authority would include:

- carrying out a flood risk assessment as part of the planning application preparation, which is able to demonstrate that the development of the site will not adversely affect (or will materially reduce) flood risk on other sites in the vicinity.
- provision of flood storage measures within the scheme, ideally as part of an ecologically valuable integrated site landscaping scheme.

The Authority will also seek to keep the Bonds Green Brook open in consultation with the Environment Agency, who seeks to restrict the culverting of watercourses.

Energy and Sustainable Design

Given growing importance of climate change and resource reduction in the regulation of the built environment, low-carbon energy and sustainable design are becoming key drivers for the planning system. The waste facility will make a significant contribution to reduction of the carbon impact of north London's waste, compared with the current practice of low recycling rates and a significant amount of disposal by landfill.

The Authority proposes to enhance this overall "good news" story in terms of the local design issues through a range of mitigation and enhancement measures for the Pinkham Way development:

- incorporation of a combined heat and power facility within the site, with the potential to export heat not required to assist the waste treatment processes.
- advanced methods and technologies for water conservation, including sustainable urban drainage systems (SUDS), rainwater harvesting and the development of green roofs.
- use of local materials and low carbon materials in the design of the facility.
- incorporation of landscaping and ecologically valuable areas, particularly along the boundaries with Hollickwood Park and the golf course. The use of tree planting and permeable paving within the lesser used paved areas could also be considered (e.g. in staff and visitor car park areas and along walkways).
- Aim to attain a very good or excellent BREEAM Industrial rating.

Visual Impact and Design Quality

The Authority recognises that the design of a visually pleasing development will greatly assist the case for a planning application on the site. A high quality architectural design can engage decision-makers in a positive way and acts, for those decision-makers, as a strong indicator that care has been taken over all aspects of the development. The Authority proposes the following actions to develop a visually pleasing development:

- a clear architectural concept which is visually pleasing and fits well with the surrounding area in terms of layout, height, massing, form, colour, texture and materials.
- sensitive treatment of boundary relationships, in particular with the park and golf course environment.
- The boundary with the North Circular creates an opportunity for a strong building line with a dramatic architectural treatment.

Community Benefits

New development and the investment it brings can make a positive contribution to the local community. This is more than compensating for impacts; instead, the waste development can make a contribution in several areas:

- Job creation for both construction and operation: The scheme should incorporate measures to ensure local people and firms have access to jobs and contract opportunities.
- Education and visitors centre: a new waste facility can be an important beacon of a sustainable community. The scheme could include a visitor centre accompanied by an education and outreach programme for the local community. The education and visitor centre could also promote the ecological value of the site, providing an opportunity for the local community to learn about some of the rare species on the site.
- Enhancement of Hollickwood Park: There may be scope to provide enhancements to Hollickwood Park as part of a package of benefits and mitigation provided with the new development.

Mitigation of Local Impacts

While much attention will be focused on the enhancements which the development could offer, The Authority recognise that a robust noise, air quality and odour control measures will be a foundational element of any scheme on the site.

The benefits of providing new waste facilities at Pinkham Way

In summary, the benefits of the development of waste management facilities include:

- Contributing towards London managing the 14mtpa of municipal and commercial/industrial waste to be produced in London over the period 2005/06-2019/20;
- Contributing towards London moving towards much greater regional self-sufficiency in waste management capacity;
- Meeting national, regional and local policy requirements for new waste management sites;
- Contributing towards the sub-regional plans for North London in terms of wastes management;
- Resulting in the reuse of previously developed sites in accordance with the London Plan policies;
- Contributing towards meeting the Borough's and the North London sub-region employment targets;
- Encouraging a range of employment opportunities for local people;
- Waste management facilities are recognised as having a lower sensitivity to flooding than residential developments;
- Bringing the site into use;
- Meeting sustainable development objectives;

- No significant development is currently located on the site, allowing for a new layout that would maximise the use of space to accommodate waste facilities;
- The waste facilities will not be in close proximity to sensitive existing uses such as residential areas and schools; and
- The chance to provide forward-looking reprocessing facilities which could also offer educational opportunities for local residents and young people.

We look forward to receiving a formal response from you on the potential use of the Pinkham Way site for development of a new residual waste treatment facility. In the meantime, should you have any queries, in respect to the above or require any clarification, please contact me directly.

Yours sincerely,



Tim Judson
Procurement Director