Subject	Duty to Co-operate: Notes on evidence of regional co-operation through the London Plan process		
Date	11 June 2012	Job No/Ref	NLWP-MM4

This note summarises how brownfield / Previously developed land (PDL) was addressed in the NLWP Technical Report and Sustainability Appraisal (SA). It also collates the record in relation to the Pinkham Way site.

1 Conclusions

There is clear evidence of the Pinkham Way site having been previously developed, both as a landfill and as a sewage works. It has been recognised for some time as a brownfield site.

The NLWP **Technical Report** used NLUD to produce a longlist. After that, it addresses PDL in its scoring of sites only as a secondary criterion, and then as a negative factor within the Site Configuration criterion. The report indicates therefore that the question of the PDL status of the Pinkham Way site did not affect the scoring of the site.

No specific reference is made in the **Sustainability Appraisal** to the allocated sites, with the exception of references to Edmonton. This is because the SA looks at a strategic level at the plan as a whole, taking account of the policies and all waste sites.

The impact of the Previously Developed Land (PDL) status of waste sites on the scoring in the SA is limited to one or two objectives (8 and 26) and only as a partial indicator within those objectives.

Given the diluting effect of these layers of analysis, it appears highly unlikely that, if the Pinkham Way site were formally identified as not being PDL, the SA's overall conclusion on the options which include the new sites would change from beneficial to adverse.

2 Brownfield status of Pinkham Way site

LB Haringey does not retain a central list of sites in the borough with previous uses and planning history associated with each site. However a search of the EA website's "What's in my backyard?" section for 'historic landfills' shows the site as 'historic landfill'. See screenshot (Attachment 1)

2.1 Landfill

The site is listed as 'Friern Barnet Sewage works' and as having first received waste on 31st December 1940 and having last received waste on 31st December 1980. The site is shown as having accepted 'Waste which remains largely unaltered once buried such as glass, concrete, bricks, tiles, soil and stones.'

2.2 Contaminated land

In Haringey's Contaminated Land Strategy, 2004, Table 13, which lists land used for public utilities 1970, describes the site as 24 acres, north of Muswell Hill Golf Club 'partly landfilled with refuse'. It's status as a SINC of Grade 1 local importance is also noted.

The Contaminated Land Strategy notes that 'A number of brownfield sites in the borough have been identified in the Unitary Development Plan (UDP) as opportunity development areas. Some are situated on land known to be contaminated; sites which are expected to be developed in the next three years are detailed below.' These are listed in table 2 and include the 'Former Friern Barnet Sewage Works, Pinkham Way'.

3 Relevant extracts from the NLWP and Technical Report

3.1 NLWP Submission Version

This is the only reference to PDL:

2.21 Where previously developed land has been in industrial use there is a potential danger of contaminated land because of the types of industry that have historically operated in north London. Where this is an issue, it needs to be dealt with before an affected site can be re-used and will be considered as part of the planning process as individual sites come forward for development.

3.2 NLWP Technical Report

The Technical report notes that the longlist of sites was informed by NLUD, but sites selected from the longlist had to meet the range of site selection criteria.

Previously Developed Land is not an explicit criterion but it forms part of the secondary sift criterion "Site Configuration". In fact, PDL appears to be a negative indicator in this context, since it is a proxy for additional development difficulty:

> ***Site Configuration***
> *3.51 An assessment was made of the layout of the site with regard to suitability of the ground surface and whether the land had been previously developed.*

4 Relevant extracts from the NLWP SA

4.1 From the 2009 Preferred Options SA Report

7. As they were developed, the Plan Preferred Options were tested for compatibility with the Sustainability Appraisal objectives. Overall it was concluded that the majority of the Preferred Options performed positively towards social, environmental and economic sustainability objectives.

9. The Site Assessment Criteria were assessed using the Sustainability Appraisal objectives, and the results of the appraisal were incorporated into the Plan. The majority of the Sustainability Appraisal objectives are addressed by the site selection criteria. Where it was considered that the objectives were not being met, it was recommended that mitigation be implemented through Plan policy. Objectives that were not addressed by the Site Assessment Criteria included: health inequalities; waste related crime; waste education; climate change adaptation; and energy efficiency measures.

4.2 From the 2012 Submission Version SA Report

4.64 In undertaking the SEA and in considering the potential social, environmental and economic effects of the NLWP a number of assumptions have been made. The key assumptions are as follows…

- *Developments on brownfield sites will be more favoured than those proposed on greenfield sites;*
- *Open space will be protected…*

From Table 4-4 Indicators and Targets

	SA Objectives	Indicators	Targets	Sources of Information
8	To maximise opportunities of and benefits for development through waste management activities	Proportion of new waste development on previously developed, derelict or under-utilised land	To use previously developed land where practicable **% land remediated for the development of waste sites	Planning Applications, Environmental Impact Assessments
26	To ensure that North London uses natural resources more efficiently and sustainably, in particular land, mineral aggregates and water	Proportion (%) or number of new waste development on previously developed, derelict or under-utilised land	Percent or number of new waste facilities on previously developed, derelict of under-utilised land	National Land Use Database, London Development Agency, Planning Applications, EIAs

From Table 4-6 Questions Addressed During the SA

	SA Objectives	Questions addressed during the SA
8	To maximise opportunities of and benefits for development through waste management activities	Will the proposal maximise opportunities of and benefits for development through waste management activities Will the proposal increase the proportion of new waste development on previously developed, derelict or under-utilised land, including upon remediated land Will the proposal increase the number of Household Waste Recycling Centres Will the proposal result in an increase in the kerbside collection of waste and recyclables
26	To ensure that North London uses natural resources more efficiently and sustainably, in particular land, mineral aggregates and water	Will the proposal ensure that North London uses natural resources more efficiently and sustainably, in particular land, mineral aggregates and water Will the proposal reduce the ecological footprint per capita in North London (global hectares)

Under the heading of "Soil", the SA notes at several points that options which follow the PPS10 guidance to support the reuse of PDL are expected to have a slight beneficial impact on soils.

Stephen Cook / Barbara Herridge, 11 June 2012

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Attachment 1: Historic Landfills – screenshot from EA website

