

**Haringey Council Core Strategy Examination  
Hearing Session 8, 22<sup>nd</sup> February 2012**

**2b Employment Land**

**i What is the rationale for the proposed changes? What evidence justifies the approach of SP8?**

- a. Following the proposed submission Core Strategy consultation in May/June 2010, the Council considered it was important to provide further clarification on its employment designations to provide a positive strategic policy for safeguarding employment land, in order to meet our future requirements and to provide locally based employment across the borough up to 2026.
- b. Therefore, an initial review was carried out which assessed all of the borough's defined employment areas and identified some DEAs that would benefit from having their designations changed to adapt to the changing environment around them, as well as to acknowledge the uses already there. The review also identified sites that require stronger protection to ensure there are sufficient sites to accommodate B uses. These proposed changes were consulted upon in November/December 2010, alongside the changes to SP2 Housing.
- c. Haringey's Employment Study (2008) provides the evidence base in support of SP8 Employment. The Study recommends that the DEAs designated in the 2006 UDP are strongly protected to provide choice and flexibility in employment land. Whilst there is a relatively small quantitative shortfall in supply relative to projected demand, the Study considers it isn't necessary to allocate additional employment sites. However, in order to meet the projected demand, it will be essential for the Council to adopt policies which strongly encourage the intensification and improvement of existing employment areas, particularly DEAs.
- d. Given the limited amount of readily available supply relative to future demand, justification remains for pursuing a strong approach to safeguarding existing employment clusters for business and industrial use. Although the Employment Study doesn't specifically identify DEAs that could have their designations changed, it does recommend that the DEAs are strongly protected to provide choice and flexibility in employment land.
- e. This approach reflects the future employment needs of the borough, with the preferred scenario representing an increase of around 15% in the stock of B use class in the borough during the period 2006 – 2026. I refer the Inspector to section 8.4, page 79 of Haringey's Employment Study (LBH – 14).

- f. In line with PPS4, LDF policies should promote a proactive and positive approach to planning for economic development and it is therefore important for flexibility to be built into policies. The evidence base and subsequent content of SP8 complies with the advice of PPS4 *Planning for Sustainable Economic Growth*.
- g. Please see paragraphs 3.1-3.6 of Matter 5 for the Council's response on how it considers SP8 to be justified by evidence.

- ii **Is there evidence to indicate that the approach of the CS is not in general conformity with the London Plan?**
  - a. There is no evidence to indicate that the approach of the Core Strategy is not in general conformity with the London Plan.
  - b. The Mayor reviewed Haringey's Core Strategy against the London Plan (2008) at every stage of the consultation process, and, since it was published in October 2009, the Mayor's consideration has also included assessment against emerging policy within the draft replacement London Plan. The Mayor's opinion on general conformity, based on an assessment against both the London Plan (2008) and the draft replacement London Plan (2009), is set out in his revised statement of general conformity, dated 20<sup>th</sup> April 2011.
  - c. Furthermore, it is also the Mayor's view that the publication of the London Plan (2011) does not raise any implications for Haringey's Core Strategy which has already been considered by the Mayor through previous assessment of the document against emerging policy within the former draft replacement London Plan (2009). This is set out in the Mayor's letter of 8<sup>th</sup> September 2011.

- iii **Is the 2009 ‘Employment Study’ sufficiently robust? What evidence supports the need for more traditional uses in designated areas?**
- a. Yes, Haringey’s Employment Study (2004) and Update (2008) provides the main evidence guiding the Council’s decisions regarding the provision of and demand for employment land and premises in the borough for the period up to 2026, and is sufficiently robust. The Study indicates that whilst there will be a decline in traditional manufacturing (B2) there will be a demand for modern B8 (including logistics, waste, recycling and transport) and B1 offices. The proposed increase in floorspace of 137,000m<sup>2</sup> over the plan period is predicted to come from redevelopment and reconfiguration of the borough’s current designated employment sites, no new allocated sites have been proposed. The approach is likely to be one of intensification and upgrading of sites to make them fit for modern practices.
- b. Demand for new employment uses at the borough’s DEAs is evidenced by new planning applications and development activity which has taken over the last three years despite the economy being in deep recession. For example:
- DEA 2 (Bounds Green Industrial Estate) – gained over 3,000 sqm of B1, B2 and B8 floorspace
  - DEA 17 (White Hart Lane, N17) - gained around 1,000 sqm B1 floorspace and recently received consent for significant development of B1, B2 and B8 uses
  - DEA 3 (Brantwood Road, N17) – Intensification of use from B8 to a mix of B1, B2 and B8 uses
  - DEA 5 (Cranford Way, N8) – Restructuring from B2 to B8
  - DEA 15 (Tottenham Hale, N17) – Gain of 3,400 sqm of B1 floorspace.
- c. It is also important to highlight that Haringey is faced with some challenging socio-economic conditions including higher than average unemployment. Consequently, the supply of a reasonable choice of viable, good quality employment land will be essential to facilitating employment growth and economic diversification in Haringey. The Council’s proposed change in designations for some employment sites in the borough reflects the need to provide the market with more certainty regarding the types of employment generating uses that will be acceptable on specific sites.
- d. It should be noted that use of the term ‘traditional (industrial) uses’ in the Core Strategy may be open to a degree of misinterpretation. The intention of this reference is to focus on the provision of land and premises for a range of core modern industrial, office and warehousing activities.

- iv **What criteria inform LSIS designation? What evidence demonstrates their applicability to the identified sites?**
- a. In line with the Mayor’s Supplementary Planning Guidance (SPG) on Industrial Capacity (RSG-15), boroughs may designate as Locally Significant those industrial sites which lie outside the Strategic Industrial Location (SIL) framework but which robust demand assessments and criteria show to warrant protection because of their particular importance for local industrial type functions.
- b. Boroughs are encouraged to designate Locally Significant Industrial Sites (LSIS) for enhancement and protection, subject to robust strategic and local evidence of demand and taking into account the criteria set out in paragraphs 4.11 – 4.13 of the Mayor’s SPG:

*Economic criteria;*  
*Land use criteria;*  
*Demand based criteria.*

The criteria are based on general economic and land use factors and indicators of industrial demand.

- c. Sites designated as LSIS in the Core Strategy have had regard to the SPG criteria referred to above. In order to ensure the Council’s evidence base is as up to date as possible, and to inform future LDF documents, the Council has commissioned an update of Haringey’s Employment Study. The emerging findings indicate that, despite the challenging global and national economic circumstances, Haringey will experience a notable increase in the demand for employment in the period up to 2026. This increase in employment will generate requirements for additional B1 and B8 floorspace provision in the borough alongside more intensive and efficient use of existing employment sites. Having regard to the Mayor’s SPG criteria, the study includes a review of all sites where re-designation proposals have been made.

- v **Is there evidence relevant to the consideration of alternative approaches?**
- a. Yes, there is evidence relevant to the consideration of alternative approaches. Haringey's Employment Study (2008) recommends that the DEAs designated in the 2006 UDP are strongly protected to provide choice and flexibility in employment land. Taking this into account the Sustainability Appraisal (SA) considered alternative approaches for SP8 Employment (SA Preferred Options Report, May 2009, and section 4, CSSD 05).
- b. The Sustainability Appraisal (SA) has followed the guidance and regulations with regard to the consideration of alternative approaches. The alternative approaches considered are set out in the Council's response to Matter 5, paragraphs 2.5 – 2.8 (ref MI-C5). One alternative policy option was to *promote greater flexibility of land uses within employment areas including Strategic Industrial Locations*. This option was rejected as it did not support local employment and assumed a London wide scenario whereby growth will occur in business and financial sectors. This option had an overall adverse effect on *SA Objective 7 (sustainable economic growth)*.
- c. The preferred policy option focuses on facilitating the restructuring of the borough's employment land portfolio to allow and increase in B1 floorspace, whilst enabling the modernisation of old stock and managed transfer of obsolete industrial sites to alternative uses. The preferred policy performed well against *SA Objective 7 (sustainable economic growth)* and indirectly *SA Objective 8 (skills and training)* and *SA Objective 9 (economic inclusion)* and was considered the most appropriate for the borough over a 15 year period.

- vi **Is the approach of the CS sufficiently flexible to ensure effectiveness? Should other land uses be permitted, e.g. residential?**
- a. Yes, the Council considers the approach of the Core Strategy is sufficiently flexible to ensure effectiveness. The approach to employment is considered to be effective for meeting the current employment needs of the borough and flexible enough to respond to changing economic circumstances. This also reflects the advice of paragraph 4.46 of PPS12 *Local Spatial Planning*.
- b. The rationale behind the proposed changes to SP8 is to ensure flexibility so that the policies are able to respond to a change in economic circumstances over the life of the plan, up to 2026. The Council considers that the employment hierarchy set out in SP8 allows for sufficient flexibility to ensure the objectives of the Core Strategy are delivered and are effective.
- c. The Local Employment Areas, as identified in SP8, will be treated more flexibly and, in principle, mixed use development including residential may be appropriate. This approach reflects the findings of the Employment Study 2008, setting out a more proactive and positive approach to planning for economic development. This is also in accordance with PPS4, policy EC2: *Planning for Sustainable Economic Growth*.
- d. The Regeneration Area designation is the most flexible of the employment categories as it can include uses appropriate in a mixed use development including residential. The Council considers that SP8 Employment does offer enough flexibility to the type of land uses allowed on some of the designations, and will be able to respond to change over the life of the Core Strategy.

vii **Should DEA9/17 be ‘regeneration areas’?**

- a. The Council is of the view that SP8, as set out in CSSD-03, is the appropriate policy approach for DEA 9(High Road West) and DEA 17 (White Hart Lane), and is in general conformity with the London Plan (2011).
- b. DEA 9 continues to experience vacant land and buildings in its northern part (Cannon) and low employment levels and poor quality access and buildings in its southern part (Peacock). Peacock estate is nevertheless occupied and all land is being used (not as efficiently as it could be). DEA 9 is also adjacent to site SSP19 designated for mixed use development. DEA 9 is very close to White Hart Lane Station and Tottenham Hotspur FC club – and the THFC proposed redevelopment.
- c. DEA 17 is a large designated local employment area on its own and is going through restructuring. There have been recent planning permissions for B1-B8 and these are now on site. 25% of the LEA is uncertain and vacant and this is of concern. It has reasonably good access to the arterial road network via the Great Cambridge Road.
- d. Supporting regeneration in Tottenham is a major Council priority, exacerbated by the impact of the riots last August, the flat housing property market, recent increases in unemployment, the agreement to invest £41m in Tottenham, the establishment of a Local/Strategic Task Force to push delivery, and the start of public consultation on both an area wide Tottenham Improvement Plan in Nov 2011 and on land west of THFC, including DEA9, in February 2012.
- d. Furthermore, DEA 9 along with all of the Tottenham Area has also been identified in the Mayor’s Draft Opportunity Area Planning Framework (OAPF) for the Upper Lee Valley. The draft is currently out for consultation (close in Feb 2012).
- e. The Council’s Core Strategy will play a key part in this regeneration, and it is therefore necessary that the plan is flexible enough to accommodate such change in this part of the borough. The Council considers that the employment hierarchy set out in SP8 allows for sufficient flexibility to ensure the wider objectives of the Core Strategy are delivered and are effective, in particular the wider regeneration of Tottenham and Northumberland Park.
- f. Both the UDP and emerging Core Strategy establish the regeneration priorities for Northumberland Park and Tottenham and set a clear policy approach for balancing employment protection and the delivery of regeneration priorities for Northumberland Park and Tottenham. UDP policy EMP4 *Non-Employment Generating Uses* remains extant and will support the implementation of SP8 Employment.



- g. Paragraph 5.1.4 of the Core Strategy (CSSD-03) explains the approach to considering retention and release of designated employment sites, stating that the Council will have regard to the criteria set out in paragraphs 4.11 – 4.13 of the Mayor’s SPG on Industrial Capacity.
  
- h. To conclude, the Council considers that SP8 Employment offers enough flexibility over the life of the Core Strategy to deliver the balance between employment growth and area regeneration. The UDP would remain extant in the interim, particularly policy *EMP4 Non Employment Generating Uses*, and the Mayor’s criteria to manage the release of surplus employment land will provide enough flexibility for DEA9 and a mechanism to consider the limited vacant and uncertain parts of DEA17.