London Borough of Haringey

Haringey Local Development Framework

Core Strategy

Publication of a Development Plan Document (Regulation 27) – additional Regulation 27 on Affordable Housing & Employment Land Designations

November 2010
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1. Introduction

1.1 The London Borough of Haringey published the Local Development Framework Core Strategy Proposed Submission document in May 2010 to seek formal representations on the legal requirements and soundness of the document prior to submission to the Secretary of State for an Examination in Public by an Independent Planning Inspector.

1.2 Our analysis of the formal representations received between May and June 2010 shows that the responses fall into two broad categories:

- **Fundamental points** that seek a change in policy. These points will need to be considered in detail as part of the Examination in Public and will be considered alongside any other issues the Planning Inspector identifies as requiring detailed consideration;
- **Minor points** which simply clarify our policy intent, a correction or improved referencing. We have addressed as many representations as possible through amendments to the Core Strategy so long as they simply clarify our policy intent, correct errors, improve referencing or update supporting evidence. None of these amendments significantly affect the policy direction or soundness of the Core Strategy. These minor changes will be submitted alongside the Core Strategy for the Examination in Public.

1.3 We have made fundamental changes to the affordable housing element of SP2 Housing and some employment land designations associated with SP8 Employment. This paper sets out these changes.

**Affordable Housing**

1.4 The Core Strategy has been drafted to provide robust, locally distinctive policies for Haringey that do not repeat regional or national guidance. The affordable housing policy within the Proposed Submission Core Strategy stated that schemes of **five** or more units should provide 50% affordable housing on site. However, the Council’s Affordable Housing Viability Study (which was issued after the consultation) recommends that the policy threshold is maintained at **ten** units.

1.5 It is necessary to have an affordable housing policy in the Council’s emerging Core Strategy that is viable and achievable. Revising the housing policy to reflect the Council’s Affordable Housing Viability Study is essential so that the Core Strategy can be submitted to the Secretary of State for examination and found sound.

**Employment Land**
1.6 A number of representations were received during consultation seeking clarification on some of the employment land designations. It is important that we consider the 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. The review is set out in the table below and identifies sites that could have their current designations adjusted to adapt to the changing environment around them as well as to acknowledge the uses already there. The process will also identify the sites that require stronger protection to ensure there are sufficient sites to accommodate ‘B’ class uses.

1.7 The fundamental changes to the Core Strategy have been subject to a Sustainability Appraisal using existing baseline data and the new evidence available since May 2010.

2. Guidance on Pre-Examination Changes

2.1 In developing these fundamental changes we have followed the relevant guidance set out in PPS12 and considered:

- How the changes relate to the Core Strategy as a whole and the Sustainable Community Strategy;
- Whether general conformity with the Regional Spatial Strategy and consistency with national planning policy is maintained;
- Whether consistency with other existing development plan documents is maintained;
- Whether consistency is maintained with other relevant plans and strategies which affect the delivery of the policies in the plan;
- Whether there are any further environmental, economic or social implications that have not already been covered in the sustainability appraisal; and
- The level of further consultation about the change that is required.

3. Commenting on Pre-Examination Changes

3.1 The Council is seeking final comments on the fundamental changes to the affordable housing element of SP2 Housing and the employment land designations, associated with SP8 Employment. The changes are set out below. This additional Regulation 27 consultation is necessary so that we can try to resolve as many issues as possible before the Examination in Public. As with all representations made in May-June 2010, it will be a matter for the Inspector conducting the Examination in Public to consider our proposed changes or any further comments about them.
3.2 To make this document as accessible as possible new or amended text is shown in bold, deletions are shown as strikethrough, and un-amended text is shown as plain text.

3.3 The documents are available to view at the following locations:

- Planning Offices, 639 High Road, Tottenham, N17 8BD;
- The Civic Centre, High Road, Wood Green, N22 8LE;
- The following libraries:
  - Wood Green Central Library, N22
  - Alexandra Park Library, N22
  - Coombes Croft Library, N17
  - Highgate Library, N6
  - Hornsey Library, N8
  - Marcus Garvey Library, N10
  - Muswell Hill Library, N10
  - St. Ann's Library, N15 and
  - Stroud Green Library, N4.
- Online: [www.haringey.gov.uk/local_development_framework/coresтратегy](http://www.haringey.gov.uk/local_development_framework/coresтратегy)

3.4 Responses should be made in writing, referencing your comments to the relevant paragraph, by email to ldf@haringey.gov.uk or FREEPOST LON 11863, London Borough of Haringey, 639 High Road, Tottenham, N17 8BD.

3.5 If you have any questions on the documents, need copies of the documents or would like some assistance in making representations please call the Planning Policy team on 020 8489 1479, email ldf@haringey.gov.uk or visit our website at [www.haringey.gov.uk](http://www.haringey.gov.uk).

Please submit any comments by **5pm on Thursday 2nd December 2010**.
3.2 SP2 Housing

3.2.1 High quality housing, which is decent and affordable, is one of the key priorities of Haringey's Sustainable Community Strategy. In managing growth, new housing investment will be targeted at fostering the development of balanced neighbourhoods where people choose to live, which meet the housing aspirations of Haringey's residents and offer quality and affordability, and are sustainable for current and future generations. This section of the Core Strategy looks at:

- The overall numbers of additional homes to be built in the borough;
- The proportion of affordable housing that the Council will seek;
- The mix of sizes and types of homes that are needed for particular groups of people;
- The design of high quality homes; and
- Gypsies and Travellers.

3.2.2 The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford in a community where they want to live. The Council will therefore seek to establish a plentiful supply and a broad range of homes to meet the needs of particular groups of people over the life of the Core Strategy. As the objective in Section 1 sets out, the Council wishes to provide homes to meet Haringey's housing needs and to deliver the housing target of 680 units per annum, in terms of affordability, quality and diversity and to help create mixed communities. This policy also performs well against the housing sustainability appraisal objectives.

This policy contributes to the spatial aspects of the following priorities in Haringey's Sustainable Community Strategy:

**SCS Priorities**

- Meet housing demand;
- Meet population growth and change;
- Create more decent and energy efficient homes, focusing on the most vulnerable.

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**SP2 - Housing**

The Council will aim to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet or exceed the target of 6,800 homes from 2007 - 2017 (680 units per annum).

**Density and design standards to deliver quality homes**

Excellence in design quality and sustainability will be required for all new homes. High quality new residential development in Haringey will be provided by ensuring that new development:
1. Meets the density levels set out in the London Plan (Table 3A.2 Density Matrix);
2. Complies with the housing standards and range of unit sizes set out in the Council's Housing Supplementary Planning Document (SPD) 2008 and adopt the GLA Housing Space and Child Play Space Standards 2009 as Haringey's own standards;
3. Aims to maximise housing for people whose circumstances makes them vulnerable and/or people with specific needs
4. Is built to 100% Lifetime Homes Standards with at least 10% wheelchair accessible housing or easily adaptable for wheelchair users with an aspiration for 20%. Units should range in size to allow families to stay together, and to accommodate live-in carers.

**Secure high quality affordable housing**

Affordable housing shall be achieved by:

5. Requiring sites capable of delivering 5 ten or more units to meet a borough wide affordable housing target of 50%, based on habitable rooms; Affordable Housing on site; (the results from the Strategic Housing Market Assessment will confirm the threshold)
6. Delivering an affordable housing tenure split of 70% Social Rented Housing and 30% Intermediate Housing;
7. Ensuring no net loss of existing affordable housing floorspace in development; and
8. Ensuring affordable housing units are designed to a high quality and are fully integrated within schemes.

*Schemes below the ten unit threshold will be required to provide 20% affordable housing on site, based on habitable rooms, or provide financial contributions towards affordable housing provision.*

*The preferred affordable housing mix, in terms of unit size and type of dwellings, on individual schemes will be determined through negotiation, scheme viability assessments and driven by up to date assessments of local housing need, as set out in the Housing SPD.*

**Maximising Housing Supply in Haringey**


3.2.4 In accordance with advice from the Government Office for London, the Council has contributed to the GLA's Strategic Housing Land Availability Assessment (SHLAA) (2009) to identify the future capacity of the borough to accommodate new housing, rather than undertaking a separate borough-wide study. The London Plan shows a housing capacity of the borough of a minimum of 6,800 from 2007/8 2006/07 - 2016/17 based on evidence from the London Housing Capacity Study.
undertaken in 2004. Indicative capacity from the SHLAA (2009) suggests that the borough has the capacity for 8,200 new units over the period 2011–2021, capable of being met mainly through the use of brownfield land. The draft Replacement London Plan (October 2009) is proposing a new housing target for Haringey of 820 units per annum. This is based on the results of the pan London SHLAA. If this new target is agreed, Haringey's housing target will increase by 140 units per annum (680 units per annum to 820 units per annum) post 2011/12.

3.2.5 The Government Office for London and the GLA produced a guidance statement in March 2008 which proposes that boroughs should roll forward the housing target for 2007-2017 _2006/07 – 2016/17_ as an indicative figure prior to the completion of the SHLAA. The SHLAA was published in October 2009 as part of the London Plan Review. However, until the new targets have been agreed Haringey will continue to use 680 additional homes per year.

3.2.6 The Council's housing target is provided through:

- Development and redevelopment, conversions from residential and non-residential properties (known as conventional supply) - **595** conventional units.
- Non self contained homes. These are homes that share common facilities or services, such as hostels, residential care homes and student accommodation - **9 units**; and
- Vacant properties brought back into use - **77 units**. These are homes that have been unused for at least 6 months or more.

3.2.7 Haringey produces a housing trajectory as part of its Annual Monitoring Report (AMR) and in line with PPS3 Housing. The housing trajectory shows which sites are expected to come forward over the next 15 years and measures Haringey's performance in meeting its strategic housing target. For the period 2011/12 - 2026, the housing trajectory shows that the supply of additional homes is expected to total **11,195**. The borough’s housing trajectory also demonstrates that the Council is likely to exceed the 680 annual target (see Appendix 2) over the plan period. Over the plan period there will be sites that come forward for housing other than those already identified. These sites are known as "windfall sites" and will contribute towards meeting the housing need in Haringey. Such sites will be assessed to ensure that they meet the needs of the community and do not harm the environment.

(Figure 3.7 Haringey’s 15 Year Housing Land Supply)

**High quality homes**

3.2.8 The Council will expect all new developments to be built to the highest quality standards.
The Council will assess housing densities in planning applications in line with those set out in the London Plan Density Matrix (Table 3A.2). Further detail on area specific density characterisation will be included in the emerging Area Action Plans.

3.2.9 In 2007 the government set a target that by 2010 all Social Housing stock will have reached Decent Home Standards. A survey of the Council’s stock concluded that at March 2008, 42% of Council stock did not meet these standards. An investment programme is underway to address this, with similar improvements being carried out by other social landlords in the borough. At March 2010, 27.5% of Council stock did not meet the Decent Homes Standards. Some areas in the borough have wider environmental issues, for example, poor design of estates, where the Council is looking beyond the upgrading of individual homes and focusing on wider estate renewal and reduction of CO2 emissions. As domestic properties contribute 50% of all CO2 emissions in Haringey, improvements to the thermal efficiency of homes in the borough will be key to reducing fuel poverty and will contribute to the Mayor’s target of 60% reduction in carbon emissions in London by 2025.

3.2.10 Haringey contains both areas of relative affluence and concentrations of deprivation. The borough has high levels of housing need, and many homes do not meet the required standards of decency or are situated in run-down areas. At the same time the borough contains highly successful neighbourhoods. As such the Council’s Housing Strategy (2009) seeks to address these issues by narrowing the gap and encouraging a greater housing mix across the borough. The Council will work with its partners to find innovative ways of making home ownership more affordable for those on low and medium income.

3.2.11 Haringey is committed to putting the welfare of children and young people first. There is evidence that inadequate space standards can lead to pressures on families and particularly children (GLA 2006). Good quality housing design can improve social wellbeing and quality of life by reducing crime, improving public health, easing transport problems and increasing property values. Building for Life promotes design excellence and celebrates best practice in the house building industry. Haringey will ensure that CABE’s Building for Life criteria are used to evaluate the quality of new housing developments across the borough and that all new affordable housing funded through the National Affordable Housing Programme meets or exceeds the minimum standard required by the HCA.

3.2.12 The Council’s policy goals are set out in the Haringey’s Housing Strategy 2009–2019:

- Improving housing services to residents across all tenures;
- Maximising the supply of affordable homes;
- In regenerating our neighbourhoods, we will achieving decent homes for all and contribute to improving the environment.
The Council’s Housing Strategy 2009 – 2019 sets out the vision to create:

Neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations.

In order to achieve this our five aims are:

1. to meet housing need through mixed communities which provide opportunities for our residents;
2. to ensure housing in the borough is well managed, of high quality and sustainable;
3. to provide people with the support and advice they need;
4. to make all homes in the borough a part of neighbourhoods of choice; and
5. to contribute to creating the Greenest Borough.

3.2.13 There are areas in the borough where over the years many properties have been converted from single dwellings into a large number of flats. Where many conversions happen in one area it can result in problems such as a significant increase in on street parking, a loss of family housing and a deterioration in the residential environment. The Council will resist conversions if they are of poor quality design, result in an increase in on street parking and are of poor environmental conditions. Further detail will be set out in the Council’s emerging Development Management DPD.

Lifetime homes and wheelchair accessible housing for people with specific needs

3.2.14 In recognition of the need for disabled people to have the same options as other people the Council will require a proportion of all new residential development to be 10% fully wheelchair accessible. However, a more aspirational target of 20%, after 2016, may be applied to future developments recognising that Haringey has an ageing population.

3.2.15 The Council also recognises the importance of the transforming social care and personalisation agenda and the aim of putting people with specific needs and disabilities in control of the resources they need to help them live in the way they want. Increasing and diversifying the range of housing options, including the development of innovative supported housing that enables people with specific needs to become full and active members of their communities will be critical in helping the Council achieve this aim.
Family Housing

3.2.16 The Council is mindful that particular communities have special housing requirements and will take these into account. Housing need particularly affects BME households, with 40% of Black African and Asian households living in unsuitable accommodation. Responding to this shortfall is a priority for the Council.

Affordable housing

3.2.17 Given the level of housing need in the borough, the Council wishes to deliver as many affordable homes as possible. Haringey’s most recent Housing Needs Assessment (2007) identified a shortfall of 4,865 affordable dwellings a year for the next five years. This has led to overcrowding and a proliferation of Houses in Multiple Occupation (HMOs). This is compared with the London average of 21% and is three times above the national average at 9%. Housing demands identify acute need for family homes (3+ bedrooms) and housing for larger families who have specific cultural and social requirements. This represents challenges for the borough in that many of those in priority need and in temporary accommodation require larger units. Such units are not widely available in the existing housing stock.

3.2.18 26% of residents consider affordable decent homes to be the most important thing in making somewhere a good place to live, and 17% think that it is the thing that most needs improving in the local area. Housing need is reflected in high demand for social housing.

3.2.19 In 2009/2010, 1,488–2,511 households joined the Housing Register, while only 710–868 households secured a permanent social rented home. In November 2008–October 2010, about 4,800–3,321 households in Haringey were living in temporary accommodation. The borough faces a huge challenge in meeting government targets to reduce these numbers. The findings of the Housing Needs Assessment (2007) justify the Council requiring 50% affordable housing in sites of 5 or more units.

3.2.20 In light of local circumstances, the Council will apply the 50% strategic London target for new affordable housing and the 5 ten dwelling threshold. Within that the Council will apply the London wide objective that 70% of affordable provision should be social housing and 30% intermediate housing. The current London Mayor intends to remove the 50% London-wide target and proposes to adjust the split between social and intermediate housing from 70/30 to 60/40. Haringey’s Affordable Housing Viability Study (currently in progress) will demonstrate that such a target is achievable if applied sensitively. Parallel to this, the Council has commissioned a joint Sub-Region Strategic Housing Market Assessment (SHMA) with the other north London Boroughs. The findings of this assessment will inform the housing mix, household size, the need for, and level of, specialist
housing to be provided to meet housing needs in the borough. *(the SHMA will provide the evidence base for the affordable housing policy).* The Council commissioned a Strategic Housing Market Assessment (SHMA) jointly with seven neighbouring boroughs in 2009; however the results have not yet been published in their final form. It is clear from the preliminary results of the SHMA that there is a very high level of housing need in the borough and that most of this consists of a requirement for social rented housing. This is consistent with previous assessments of housing need in Haringey – in particular the Housing Needs Survey of 2007. It is clear from this work that housing needs level in the borough can justify a target of at least 50% affordable housing on all new residential developments of ten or more units. The SHMA will provide further evidence to support policy development in relation to tenure split.

Additionally, Haringey has undertaken its own Affordable Housing Viability Study (October 2010) which demonstrates that such a target is achievable and viable, if applied sensitively. In terms of viability, the Study also concludes that schemes below the ten unit threshold can provide 20% affordable housing on site, based on habitable rooms, or provide a financial contribution towards affordable housing provision. During the downturn in the housing market each scheme will be examined carefully in order not to restrain residential development. Further detail on negotiating affordable housing can be found in the emerging Development Management DPD.

3.2.21 The Council will seek to achieve the maximum reasonable proportion of affordable housing through negotiating section 106 agreements on all suitable development sites. Affordable housing should be provided on site so that it contributes to achieving the objective of creating more mixed communities and avoids creating concentrations of deprivation.

3.2.22 There may be physical or other circumstances where an off-site provision would be preferable or cases where the off site provision would be of superior quality than which could be provided on site. Off-site provision misses the opportunity for creating mixed and balanced communities and will only be acceptable where the Council is satisfied that the preferred unit mix and tenure of affordable housing could not be provided on site.

3.2.23 Where it is considered appropriate to provide the affordable housing off site a higher proportion of affordable housing will be sought in order to reflect the fact that the development achieved 100% private market housing on the initial site. The two sites should be considered together for the purpose of calculating the affordable housing to be provided to ensure that the percentage of affordable housing delivered is 50% of the total number of habitable rooms developed across both sites. The ratio of affordable housing to private market housing when provided on site would be 1:1. Therefore 100% of the habitable rooms provided on an alternative site should be affordable.
3.2.24 To achieve inclusive and mixed communities the Council will give priority to the provision of affordable housing and homes for older and vulnerable people. The Council will seek to enhance the support available for people to remain in their homes or to live as independently as possible. The Council recognises the need to change the character of housing provision for older members of the community. New provision will seek to combine independent living and care on the same sites where possible.

3.2.25 According to CABE's Building for Life successful development fully integrates the tenure mix avoiding differentiation between individual dwellings and parts of the scheme based on their area. Therefore, the Council will seek to avoid large single tenure developments or the predominance of a single tenure type in any one area.

3.2.26 The Council’s first Draft Borough Investment Plan (BIP), September 2010, highlights the diverse needs of Haringey’s communities focusing on Haringey as a place with planned regeneration, housing and associated infrastructure projects fitting together as part of Local Area Plans. This represents a shift away from the reactive programme based approach towards the place shaping approach to meet local community needs.

3.2.27 A significant proportion of the new homes delivered over the next ten years will be supplied at Tottenham Hale and Haringey Heartlands which are designated as an Area of Opportunity and Area for Intensification respectively. The BIP details these and other significant regeneration opportunities in Haringey, particularly the wider Tottenham area including the Seven Sisters Corridor linking through from the major regeneration of Woodberry Down in Hackney to Tottenham Hale (including Lawrence Road) and extending to the Spurs Stadium development and other strategic projects such as Hornsey Town Hall and Hornsey Depot sites. These projects will produce housing supply in a range of tenures and sizes recognising supported housing requirements for vulnerable persons with training and employment opportunities to create mixed and sustainable communities.

**Indicators to monitor the delivery of SP2**

- Annual average housing provision over the plan period in accordance with the London Plan targets up to 2016;
- 50% affordable housing provision on sites;
- Levels of densities for residential development in line with PPS3 and the Density Matrix of the London Plan;
- All new housing built to Lifetime Homes Standards and 10% wheelchair accessible housing; and
- All new housing built to high quality design and meet CABE Building for Life criteria.
For further details on national, core and local indicators please see Haringey's Monitoring Framework supporting document.

**Key evidence and references (please remove spaces between bullet points)**

- Haringey's Housing Needs Assessment, Fordhams 2007
- Haringey's Affordable Housing Viability Assessment, Tribal Consulting 2010
- Design and Quality Standards, Homes and Communities Agency 2007
- North London Sub-regional Strategic Housing Market Assessment, ORS 2010
- The London Plan (consolidated with Alterations since 2004), Mayor of London 2008
- Planning Policy Statement 3: Housing, Department of Communities and Local Government 2006.
5.1 SP8 Employment

5.1.1 A key priority of Haringey's Sustainable Community Strategy is to ensure economic vitality and prosperity is shared by all. This will be achieved by promoting a vibrant economy, meeting business needs, increasing skills, raising employment and reducing worklessness so that all residents can contribute to and benefit from a prosperous economy.

5.1.2 As the objectives in Section 1 set out, the Council wishes to strengthen Haringey’s economy by reducing worklessness by increasing skills, raising educational attainment, and improving childcare and nursery provision. The Council would also like to meet the needs of different sectors of the economy, including SMEs and those organisations within the voluntary sector through the provision and range of premises of different types, sizes and costs.

5.1.3 Strategic policies 8 and 9 are important in achieving the vision and objectives of the Sustainable Community Strategy, the Regeneration Strategy and this Core Strategy by protecting employment land, providing more jobs and training opportunities needed to support Haringey's growing population and by securing land and premises for the borough's businesses.

This chapter contributes to the spatial aspects of the following outcomes in Haringey's Sustainable Community Strategy.

SCS Priorities

- Reduce worklessness;
- Increase skills and educational achievement;
- Increase sustainable economic activity;
- Maximise income; and
- Address child poverty.

SP8 - Employment

The Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Area.

The Council will:

- Protect B uses including light industry, logistics, warehousing and storage facilities to meet the forecast demand of 137,000m² up to 2026;
- Support local employment and regeneration aims;
- Support environmental policies to minimise travel to work;
- Support small and medium sized businesses that need employment land and space; and
- Contribute to the need for a diverse north London and London
economy including the need to promote industry in general in the Upper Lea Valley and in particular promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.

**Strategic Industrial Locations**
The Council will safeguard the following sites as Strategic Industrial Locations (SIL) as identified in the London Plan:

- Tottenham Hale *(Lindens/Rosebery Works, N17)* and;
- Part of Central Leeside *(Brantwood Road, N17, Marsh Lane, N17 and north east Tottenham, N17).*

**Locally Significant Industrial Sites**
The Council will safeguard the following sites as Locally Significant Industrial Sites (LSIS) for a range of industrial uses (B1 (b), (c), B2 and B8) where they continue to meet demand and the needs of modern industry and business:

- Crusader Industrial Estate, N15;
- **Bounds Green Industrial Estate**;
- Cranford Way, N8;
- **Friern Barnet Sewage Works, N10**;
- High Road West, N17;
- Lindens/Rosebery Works, N17;
- **Millmead/Ashley Road Extension, N17**;
- Queen Street, N17;
- South Tottenham, N17;
- Vale Road/Tewkesbury Road, N15;
- White Hart Lane, N17.

**Local Employment Areas**
The Council has identified other employment generating sites in the borough which would benefit from a concentration of employment generating uses or mixed use including residential, employment and community facilities. The redevelopment of these areas will ensure that there is no overall loss of employment generating floorspace.

5.1.4 Taking a more flexible approach, where local employment areas are no longer suitable for industrial or other employment generating uses a progressive release of land will be carried out, in order to facilitate urban regeneration. This released land will be allocated on a sequential needs basis. Each case will be looked at on merit, having regard to all material considerations.

5.1.5 The Council has identified a hierarchy of employment land, where certain types of employment uses should be concentrated. These employment areas vary in age, quality and size of buildings, access and the nature of the businesses within them.
Strategic Industrial Land (SIL)

5.1.6 In terms of Strategic Industrial Locations (SILs), north London contains 20% of London’s industrial land with seven SILs, two of which are located in Haringey (part of Central Leeside and Tottenham Hale). These sites form a London wide framework of sites for industry, business and warehousing. The London Plan states that in managing the stock of industrial land, account should be taken of the need to make provision for transport land and land for waste management facilities in line with the self-sufficiency requirements of the London Plan and taking into account some of the Central Activity Zone’s needs.

5.1.7 The London Plan identifies two broad categories of SIL, Preferred Industrial Locations (PILs) and Industrial Business Parks (IBPs). Within Haringey, Central Leeside (which includes Brantwood Road, North East Tottenham, Willoughby and Marsh Lane) and Tottenham Hale are classed as SIL - the latter is an IBP which accommodates businesses requiring a higher quality environment.

5.1.8 The SILs within the Central Leeside boundary will be protected against redevelopment and retained in employment. This is particularly important, given the proposal for around 5000 new homes in Enfield, on the border of these employment sites. These employment areas could provide jobs and training for some of these residents and contribute towards creating a mixed and sustainable community. It is for this reason that changes of use outside the 'B' use class, that are not consistent with or complimentary to traditional B uses, will not be allowed.

5.1.9 The Mayor's Industrial Capacity SPG expands on Policies 2A.7 and 3B.5 of the London Plan to manage, promote and, where appropriate, protect Strategic Industrial Locations, London’s strategic reservoir of industrial development capacity. The SPG identifies the 'plan, monitor and manage' approach to surplus industrial land, with the aim of reconciling the relationship between supply and demand during 2006-2026. Furthermore, when the net reduction in industrial land demand, and management of vacancy rates are considered, there is scope for the release of around 814 hectares of industrial land in the north sub-region (48ha per annum over the period 2006-16 and 33ha per annum for 2016-26). Haringey is classified as a "limited transfer" of industrial sites, which means safeguarding the best quality sites and managing the rest to reduce vacancy rates where possible. This means that in developing policies for the retention and release of land, Haringey should take account of this classification.

Locally Significant Industrial Sites (LSIS)

5.1.10 These are well established industrial areas and the aim is to retain them solely for uses that fall within B1, B2, B8 uses or uses that share
strong similarities to this use class. Retail development does not fall within the scope of this policy. In line with the 2008 Employment Study, the Council will protect these areas to provide choice and flexibility in employment land. The Council will look at opportunities to improve and enhance the general environment of these areas and buildings but will not permit any change of use from those listed above.

Local Employment Areas

5.1.11 These areas will be treated more flexibly and uses that generate employment other than the B use class will be considered. Some of these activities fall outside the confines of the B class uses that are characteristic of those in the Industrial Locations but nevertheless provide a source of employment and contribute to the local economy.

5.1.12 In principle, mixed use development including residential, employment and community facilities may be appropriate in some Local Employment Areas. These areas provide the opportunity to provide essential community infrastructure for the local community at large. In accordance with the findings of the Haringey Employment Study 2008, a more proactive and positive approach to planning for economic development is required. It will be important for Local Employment Areas to take a flexible approach to economic development by not placing significant restrictions on the type of employment use that is permitted on allocated sites.


Protection & Enhancement of Existing Employment Sites

5.1.14 In 2006 approximately 61,000 jobs existed in Haringey (excluding self-employment). This represents an increase of 3.5% since 1998. In March 2010 (for the period April 2009 – March 2010) the employment rate in Haringey was 59%, lower than that of London (68%) and England (70%), and down approximately 4.8% over the previous 2 years. This is comparable to overall growth in the UK, but slightly lower than the overall growth rate for London. Haringey's economy is dominated by employment in three broad sectors which together account for over 80% of employment, namely:

- Education
- The public sector 24% (including education and health);
- Retail 13% and
- Wholesale and manufacturing
- Service sector 18% (ranging from cafes, pubs, banks and estate agents).

5.1.15 Haringey's relatively strong representation in the manufacturing sector compared to other areas reflects the presence of significant strategic
and local industrial areas in the borough. However, over the life of the LDF the Council should consider means of balancing the needs of competitive industrial and manufacturing activities with service and warehousing sectors with significant growth potential.

5.1.16 The London Plan 2008 provides employment growth projections for the north London sub-region of 300,000 additional jobs over the period 2006 – 2026 (14,300 per annum). Haringey has a key role in contributing to this target.

5.1.17 The Upper Lee Valley area is predominantly a small firms economy and public sector employment represents the largest single sector for jobs in the north London region. Economic performance has declined over the years and large tracts of land previously in employment use are obsolete.

5.1.18 A review of the borough’s existing employment land and buildings was undertaken in 2008. The Employment Study 2008 provided an assessment of the employment land and demand in the borough. The study recommended that all existing employment sites (designated or otherwise) be retained. Therefore, in the first instance, support will be given for the other designated sites and the smaller sites to remain in employment use. However, flexibility will be shown for alternative uses that complement the employment uses, contribute to social infrastructure or provide training.

5.1.19 Manufacturing employment in Haringey continues to decline. Indeed, this decline is more pronounced in Haringey than in London or Great Britain. Haringey’s Employment Land Study 2009 reflects this change in employment base by predicting a need for total floorspace requirement of approximately 137,000m2 for the period 2006 - 2026. This includes a net reduction in demand for industrial floorspace as well as a modest net increase in logistics, warehousing and storage facilities. The majority of demand is predicted to be for B1 floorspace including light industrial. Much of this could be provided in Wood Green Metropolitan Town Centre and the District Town Centres. This is supported in a working paper (39) produced by GLA which states that employment in all sectors is either flat or has shown moderate growth.

5.1.20 The Mayor's Industrial Capacity SPG urges boroughs to make employment land available for transport functions, such as rail freight facilities, bus garages and waste management facilities. The identification of sites for future waste management facilities will be addressed by an emerging North London Waste Plan. The identification of rail freight sites in London is part of ongoing work by Transport for London on a Rail Freight Strategy.

5.1.21 The need for an increase in the provision of good quality, flexible office space, particularly for small businesses is supported by the views of commercial property agents active in Haringey- as identified in a
survey carried out as part of the Employment Land Study 2008. SMEs are also an important part of Haringey’s economy, and the London Plan highlights the need for local authorities to ensure adequate provision is made for SMEs, given the anticipated role of these businesses in accommodating future growth of employment outside central London. Where appropriate and viable, the Council will encourage the provision of such office accommodation for SMEs. In addition, environmental enhancement and high quality design are an important element in the enhancement of existing employment sites. Please see SP11 for the Council’s approach to design.

5.1.22 The North London Employment Land Study (2006) indicated that Haringey has the oldest industrial/warehousing stock in the sub-region. There is little opportunity for speculative construction due to few opportunities for redevelopment on reasonably sized plots. The market was described as being restricted due to the lack of single large occupiers and the highly fragmented ownership of many sites. In the study, most of the borough’s stock was identified as either good or reasonable with a smaller proportion of buildings identified as poor or very poor compared to North London as a whole. Haringey’s net employment land demand was forecast to be reduced over the period to 2016. Haringey was not perceived to be a key office location mainly due to its proximity to the centre of London, with most demand originating from companies historically located in the area. These findings were supported by the London Office Policy review in 2007.

5.1.23 In June 2009, the North London Strategic Alliance commissioned a report, which looked at the economic position of the Upper Lee Valley and how it could contribute to opportunities to Provide more workspace and leisure as well as improving its existing business base. Its proximity to the major road network gives it a strong position from which to entice businesses and other appropriate uses as well as exploit opportunities to create and improve recreation and leisure pursuits. The report has four themes which will be used as a basis for implementing the strategies:

- Green/sustainable industries and resource management;
- Employment and skills - apprenticeships;
- Developing the further and higher education offer; and
- 2012 and the visitor economy.

5.1.24 The Outer London Commission has recently carried out an economic profile. The Commission's interim findings concluded, among other things, that growth should focus on successful areas and not start from scratch; that there is a need to release land for development, that outer London needs to improve skills through higher or further education to reinforce its offer; and that there is a need to re-invent, re-brand and actively market parts of outer London and its distinct offers.
Higher Density Uses on Existing Sites

5.1.25 The policy focuses on facilitating the restructuring of the borough’s employment land portfolio to allow an increase in B1 floorspace whilst enabling the modernisation of old stock and managed transfer of obsolete industrial sites to alternative uses. Balanced restructuring and diversification is more likely to assist in stimulating sustainable economic growth compared to an approach which focused on a significant net increase or decrease in the total supply of employment land in the borough.

Green Industries

5.1.26 The Council is committed to reducing and mitigating the negative effects of climate change. In order to help achieve this and in conjunction with policies in the London Plan (chapter 4A), the Council will support and promote the development of green industries and green practices. For example, the Council will expect new large developments to incorporate CHP and other renewable fuels, wherever possible. Industries that manage recycling and reuse of waste within the borough will be encouraged, as will industries that reduce their carbon footprint in their day-to-day activities. This is also in line with SP4 Working Towards a Low Carbon Haringey.

Small and Medium Enterprises

5.1.27 The London Plan describes the North London sub-region as stretching from the Central Activities Zone (CAZ) to the northern fringe of London with an exceptionally varied set of strongly defined communities. Economic performance is described as being varied with some strong employment growth in the CAZ and its fringe, but with other areas continuing to experience deprivation and slow growth/declining employment, including parts of the Upper Lee Valley and industrial areas around the North Circular Road. The release of surplus industrial land to other uses will need to be rigorously managed, particularly in areas that can accommodate this release. This includes Opportunity Areas to the east (including Tottenham Hale) and to the west (Haringey Heartlands, including Wood Green Metropolitan Town Centre). Small and medium sized enterprises (SMEs) are important elements in the sub-regional economy and they need to be fully supported.

Indicators to monitor the delivery of policy SP8

- Increase in B1 floorspace;
- % of development contributions secured for training purposes and to support initiatives to reduce worklessness;
- Number of new jobs created;
- Number of new businesses registered in Haringey; and
- The determination and monitoring of planning applications and appeals.
For further details on national, core and local indicators please see Haringey’s Monitoring Framework supporting document.

Key evidence and references

- Haringey Employment Land Study, London Borough of Haringey 2004
- Haringey Employment Land Study, London Borough of Haringey 2009
- Haringey’s Well being Strategic Framework, Haringey Strategic Partnership 2007
- The London Plan (consolidated with Alterations since 2004), Mayor of London 2008
- Economic Profile of Key Locations in Outer London, Outer London Commission 2009
- An Economic Vision for the Upper Lee Valley, North London Strategic Alliance 2009
**Review of Haringey’s Employment Land Designations**

In conjunction with the Core Strategy’s objectives to protect employment land, provide more jobs and training opportunities and securing land and premises for the borough’s businesses, the review of defined employment land in the borough aims to ensure there is adequate land for employment uses up to 2026.

The proposed changes in designation to some of the 22 designated areas reflects the alteration of the uses to those areas over the years and attempts to reconcile the existing use of those areas to their possible transformation in the future. The table below sets out which employment areas are to be re-designated and the maps show the current and proposed type of employment land.

**Employment Land Hierarchy**

**Strategic Industrial Locations (SILs)** have the strongest protection against change of use from traditional ‘B’ class uses. These sites have been identified through the Sub-Regional Development Framework (SRDF) for the London Plan for North London. They play a vital role in the availability of industrial land within London and so changes of use outside of traditional ‘B’ class uses are strongly resisted. The sites included in this category include:

- Brantwood Road, N17
- Lindens/Rosebery Works, N17
- North East Tottenham, N17
- Marsh Lane, N17

**Local Strategic Industrial Locations (LSILs)** are the next tier of employment land. These sites are defined at local authority level but still carry the same level of protection as those identified above for the same reason. The sites in this category include:

- Crusader Industrial Estate, N15
- Bounds Green Industrial Estate, N11
- Cranford Way, N8
- Friern Barmet Sewage Works, N10
- Millmead/Ashley Road Extension, N17
- Vale Road/Tewkesbury Road, N15

**Local Employment Areas (LEAs)** are employment sites that offer a more flexible approach to the uses on them. This category has been divided into two further categories. **Employment Land (EL)** is land that is deemed acceptable to use for other employment generating uses that complement the traditional ‘B’ class uses, such as a small element of retail and food,
crèche/nursery. A **Regeneration Area (RA)** is the most flexible of the categories as it can include uses appropriate in a mixed use development, such as retail, community and residential uses.

The sites in the Employment Land category include:

- Campsbournne, N8
- High Road West, N17
- Queen Street, N17
- White Hart Lane, N17
- Wood Green (northern area), N22
- N17 Studios, 784-788 High Road, N17
- High Road East, N17
- Rangemoor Road/Herbert Road, N15

The sites in the Regeneration Area category include:

- Hale Wharf, N17
- Tottenham Hale, N17
- South Tottenham, N17
- Willoughby Lane, N17

This employment land review forms part of the evidence base for the emerging Core Strategy in order to meet our future requirements and to provide locally based employment across the borough up to 2026. The review identifies the sites that require stronger protection to ensure there are sufficient sites to accommodate ‘B’ class uses. As well as ensuring there is sufficient land for ‘B’ class uses, the Council is charged with providing land for other uses which help to create a sustainable community, including leisure, education and social infrastructure. Changes to more flexible designations would release land for some of these uses.
<table>
<thead>
<tr>
<th>UPD NUMBER</th>
<th>NAME</th>
<th>EXISTING TYPE OF DEA</th>
<th>PROPOSED TYPE OF DEA</th>
<th>AREA (Hectares)</th>
<th>REASON FOR CHANGE</th>
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<tbody>
<tr>
<td>1</td>
<td>Crusader Industrial Estate, N15</td>
<td>IL</td>
<td>SIL</td>
<td>1.57</td>
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<td>2</td>
<td>Bounds Green Industrial Estate, N11</td>
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<td>5.52</td>
<td>A change in designation will ensure this DEA is targeted towards more traditional industrial uses.</td>
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<td>3</td>
<td>Brantwood Road, N17</td>
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<td>SIL</td>
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<td>4</td>
<td>Campsbourne, N8</td>
<td>RA</td>
<td>LEA - EL</td>
<td>0.55</td>
<td>A change in designation will ensure this DEA is targeted towards traditional industrial uses and uses that complement traditional industrial uses.</td>
</tr>
<tr>
<td>5</td>
<td>Cranford Way, N8</td>
<td>IL</td>
<td>LSIL</td>
<td>7.87</td>
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<td>6</td>
<td>Friern Barnet Sewage Works, N10</td>
<td>EL</td>
<td>LSIL</td>
<td>6.2</td>
<td>A change in designation will ensure this DEA is targeted towards more traditional industrial uses. Complies with pre-application</td>
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<td>PROPOSED TYPE OF DEA</td>
<td>AREA (Hectares)</td>
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<td>7</td>
<td>Hale Wharf, N17</td>
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<td>LEA -RA</td>
<td>1.72</td>
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<td>8</td>
<td>N17 Studios 784-788 High Road, N17</td>
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<td>LEA -EL</td>
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<td>LEA -EL</td>
<td>2.58</td>
<td>A change in designation will relax the current restrictions, allowing complementary uses to traditional industrial uses.</td>
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<td>10</td>
<td>Lindens/Rosebery Works, N17</td>
<td>SEL IL</td>
<td>SIL</td>
<td>1.32</td>
<td>No change.</td>
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<td>11</td>
<td>Millmead/Ashley Road Extension, N17</td>
<td>SEL RA</td>
<td>SLIL</td>
<td>11.47</td>
<td>A change in designation will ensure this DEA is targeted towards more traditional industrial uses.</td>
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<tr>
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<td>PROPOSED TYPE OF DEA</td>
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<td>12</td>
<td>North East Tottenham, N17</td>
<td>SEL IL</td>
<td>SIL</td>
<td>15.5</td>
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<td>13</td>
<td>Queen Street, N17</td>
<td>IL</td>
<td>LEA -EL</td>
<td>1.6</td>
<td>A change in designation will relax the current restrictions, allowing complementary uses to traditional industrial uses.</td>
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<td>14</td>
<td>South Tottenham, N17</td>
<td>SEL IL</td>
<td>LEA -RA/EL</td>
<td>9.12</td>
<td>A change in designation will relax the current restrictions from solely traditional industrial uses. If the designation changes to 'EL', this would allow complementary uses to traditional industrial uses. If the designation changes to 'RA', this would allow a wide range of uses including residential and community uses.</td>
</tr>
<tr>
<td>15</td>
<td>Tottenham Hale</td>
<td>SEL RA</td>
<td>LEA -RA</td>
<td>13.22</td>
<td>No change.</td>
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<td>UPD NUMBER</td>
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<td>16</td>
<td>Vale Road/Tewkesbury Road, N15</td>
<td>IL</td>
<td>LSIL</td>
<td>6.73</td>
<td>No change.</td>
</tr>
<tr>
<td>17</td>
<td>White Hart Lane, N17</td>
<td>IL</td>
<td>LEA -EL</td>
<td>8.05</td>
<td>A change in designation will relax the current restrictions, allowing complementary uses to traditional industrial uses.</td>
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<tr>
<td>18</td>
<td>Willoughby Lane, N17</td>
<td>IL</td>
<td>LEA - RA</td>
<td>1.1</td>
<td>A change in designation would allow a wide range of uses including residential and community uses.</td>
</tr>
<tr>
<td>19</td>
<td>Wood Green (northern area) SEL RA</td>
<td>SEL</td>
<td>LEA -EL</td>
<td>6.45</td>
<td>A change in designation will relax the current restrictions, allowing complementary uses to traditional industrial uses.</td>
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<tr>
<td>20</td>
<td>High Road East, N17</td>
<td>EL</td>
<td>LEA -EL</td>
<td>1.03</td>
<td>No change.</td>
</tr>
<tr>
<td>21</td>
<td>Marsh Lane, N17</td>
<td>SEL</td>
<td>SIL</td>
<td>2.1</td>
<td>No change. Part of Central Leeside.</td>
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<td>NAME</td>
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<td>PROPOSED TYPE OF DEA</td>
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<td>22</td>
<td>Rangemoor Road/Herbert Road, N15</td>
<td>SEL RA</td>
<td>LEA -EL</td>
<td>3.03</td>
<td>A change in designation will relax the current restrictions, allowing complementary uses to traditional industrial uses.</td>
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