

30 November 2010

**Core Strategy Development Plan Document, Additional Regulation 27
consultation on Affordable Housing and Employment Land**

(Haringey Council Local Development Framework)

Consultation on Pre-Submission Document

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Planning and Compulsory Purchase Act 2004 (as amended); Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

Strategic issues

- Strategic Industrial Location not appropriately reflected through policy designation.
- Regeneration Area policy designation may allow for significant retail development outside of town centres.

Recommendation

That the Mayor agrees to submit the comments set out in this report and in the attached appendix to Haringey Council as the formal response to the Additional Regulation 27 consultation on affordable housing and employment land designations, and that Haringey Council be advised that the proposed Submission Document is **not in general conformity** with the London Plan in relation to the above strategic issues.

Context

1. On 4 November 2010 Haringey Council issued an additional Regulation 27 consultation to the Mayor of London on the above Development Plan Document. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period ends on 2 December 2010.
2. The Planning and Compulsory Purchase Act 2004 ("the Act") introduced a new system of preparing development plans. This requires boroughs to progressively replace existing unitary development plans with a portfolio of local development documents that will collectively form the local development framework for each of the boroughs. The local development framework together with the London Plan provides the essential framework for planning at the borough level. The "development plan" in London for the purposes of section 38(6) of the Act is:
 - The London Plan (consolidated with alterations since 2004), and
 - Development plan documents produced by the borough councils (and saved unitary development plan policies in transitional period).
3. There are three types of local development documents: development plan documents (DPDs); supplementary planning documents (SPDs); and statements of community involvement.

The document now being consulted on is a DPD with development plan status, which will be subject to an examination to test the 'soundness' of the plan.

4. Planning Policy Statement 12 (*'Creating strong, safe and prosperous communities through Local Spatial Planning'*) sets out that to be 'sound' a core strategy should be justified, effective and consistent with national policy. Paragraph 4.50 of PPS 12 sets out that an Inspector is charged with checking that the plan has complied with legislation, which will include checking that the plan conforms generally to the London Plan.

5. The Haringey Local Development Framework will replace the adopted 2006 Haringey Unitary Development Plan. It will set the Council's approach to the planning of the borough up to 2026 and will consist of the Core Strategy, Proposals Map, Development Control Policies and Site Specific Allocations Documents, and a number of supplementary planning documents.

The Mayor's role

6. All development plan documents must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the Act. It is also a statutory requirement for local planning authorities to request the Mayor's opinion on general conformity at the same time as it publishes the document prior to submitting it to the Secretary of State. Regulation 27 requires consultation at the pre-submission stage. The Mayor issues this opinion on DPD general conformity in accordance with Section 24(5) of the Act.

7. Mayor of London's comments will be made available on the GLA website www.london.gov.uk.

Update following previous representations

8. The Deputy Mayor and Chief of Staff, acting under delegated authority, made representations at the Pre-Submission consultation stage of the plan preparation process on 16 June 2010, (planning report PDU/LDF14/LDD08/01). The representations raised three non general conformity concerns in relation to waste and play space, and made various other comments. The concerns of non general conformity are detailed below for reference.

- The Core Strategy makes no reference to the commitment to increase recycling of municipal, commercial and industrial waste. This is inconsistent with London Plan policy 4A.21.
- Core Strategy policy SP6 only makes reference to the collective apportionment of waste across the London boroughs participating in the joint North London Waste Plan. The Council should clearly state its own waste apportionment and recycling targets, and include a commitment to facilitate the maximum use of waste sites in line with London Plan policy 4A.24.
- Core Strategy policy SP13 should make explicit reference within the policy box to the requirement for provision of play and informal recreation space for children and young people in line with London Plan policy 3D.13.

9. Since these representations were made the Council have continued to engage in full and constructive discussions with the GLA in order to address the outstanding concerns. As a result of these discussions the GLA is satisfied that the issues of non general conformity occurred as a result of some clerical omissions and missing signposting.

10. On 28 September 2010 the Council informally consulted the GLA on a proposed schedule of changes to the Core Strategy, intended to address the concerns of non general conformity, as well as

the various other representations made at the Pre-Submission consultation stage. The changes proposed to address the above mentioned non conformity issues are detailed below.

Waste

11. The Council proposes a clarification of Core Strategy policy SP6 to amend the third bullet point of SP6 to include "...the commitment to increase recycling of municipal, commercial and industrial waste...". This amendment would clearly reference the commitment to increase recycling rates of municipal, commercial and industrial waste and is supported in line with London Plan policy 4A.21.

12. The Council also intends to make further amendments to Core Strategy policy SP6 in order to address the second non conformity concern relating to the identification of Haringey's waste apportionment target, and commitment to facilitate the maximum use of waste sites within the Borough.

13. The Council proposes a clarification of Core Strategy policy SP6 to give stronger reference to the North London Joint Waste Plan, and to include Haringey's waste apportionment and recycling targets, along with the commitment to facilitate the maximum use of waste sites. This amendment would be supported in line with London Plan policy 4A.24.

Play space

14. The Council proposes to amend paragraph 6.3.33 to include a stronger reference to London Plan policy 3D.13. The Council also intends to further strengthen the policy by inserting text stating the requirement to provide children's informal or formal play space to meet a minimum of 3 sq.m. per child, as set out in the Council's Open Space Standards SPD, and an aspirational target of 10 sq.m. per child, as set out in the Mayor's SPG *Providing for Children and Young People's Play and Informal Recreation*.

15. Given the comparatively low minimum play space requirements of the Council's Open Space Standards SPD, the explicit reference to the target within Mayor's SPG is welcomed, and the proposed amendments to this policy would be supported by London Plan policy 3D.13.

16. The GLA is broadly satisfied that the proposed amendments to the above policies would adequately address the concerns of non general conformity raised at the Pre-Submission consultation stage. The Council have indicated their intention to present this schedule of proposed changes to the Inspector at the examination, and the GLA would support this.

Proposed representations on additional Regulation 27 consultation

17. The most significant strategic issues are outlined in this report. Further detailed comments are provided in Appendix 1 and must also be considered as part of these representations.

Employment

18. Since the Pre-Submission consultation stage the Council has made fundamental changes to various employment land designations associated with proposed Core Strategy Policy SP8. These are intended to better respond to changing future requirements, as well as identifying sites that require stronger protection.

19. The GLA broadly supports the Council in their aspiration to identify areas of employment land for managed release and redevelopment, as well as the desire to consolidate and redefine strategic industrial locations (SIL) in order to maintain a functional reservoir of high quality industrial land.

20. However, having reviewed the detail of the proposed designation changes, the GLA feels that further refinement is required to provide an optimal response to these issues, and to ensure general conformity with the London Plan. A number of the key issues are identified below, and further detail is provided in Appendix 1.

Millmead and Ashley Road

21. The GLA notes that the Millmead industrial estate has been re-designated as a Locally Significant Industrial Site (LSIS). While the GLA is prepared to see a reconfiguration of the wider SIL designation at Tottenham Hale, the Council are advised that the Millmead industrial area is to retain its SIL designation. The proposed re-designation of this industrial area as a LSIS is contrary to the principles of Policy 2A.10, and therefore, not in general conformity with the London Plan.

22. To address this issue the Council must reflect the SIL designation at Millmead through proposed Core Strategy policy SP8, and the associated Defined Employment Areas map, to ensure general conformity with the London Plan.

23. With regard to the adjacent Ashley Road industrial area, the Council is asked to have regard to the emerging Upper Lee Valley Opportunity Area Planning Framework (OAPF) when forming the boundary for the SIL designation in this area. Steering group discussions for the OAPF, involving both the Council and the GLA, have identified a portion of this SIL for managed release. The principle for this approach has been based on employment studies by both the GLA and the Council, and represents a coordinated approach to delivering local and strategic objectives for the Upper Lee Valley.

24. For clarity, the draft Upper Lee Valley OAPF identifies a 10 ha portion of SIL, including the Ashley Road industrial area, as suitable for managed release. GLA officers would welcome the opportunity to assist the Council in defining the revised SIL boundary as required.

Tottenham Hale

25. In view of the emerging Upper Lee Valley OAPF, the GLA accepts the principle of designating this area of SIL as a Local Employment Area suitable for regeneration. This will facilitate regeneration and mixed use redevelopment to support an integrated town centre at Tottenham Hale, and is welcomed. The Council are advised to adopt the same approach at Ashley Road, in view of the comments above.

Local employment areas

26. It appears that the Council is introducing a new "Regeneration Area" designation within the Local Employment Area policy context. It is understood this designation is intended to introduce a flexible approach, and could allow for mixed use development on local employment land.

27. The GLA notes that the policy approaches within Regeneration Area designations differ significantly from those of the existing Local Employment Areas. However, proposed Core

Strategy policy SP8 has not been revised to fully define the policy differences between these designations.

28. The Council is therefore advised to define this new designation within the SP8 policy box to ensure this policy retains its internal continuity.

Regeneration Areas

29. While the principle of a mixed use regeneration of certain areas of local employment land would be supported in principle, the GLA has concerns with regard to a number of the sites that have been given this designation. Primarily, this is due to the fact that the policy associated with the Regeneration Area designation does not seem to have been designed in a way which would be able to resist large scale retail development in out of town locations.

30. The following Regeneration Areas are in out of centre locations, and represent concern: Willoughby Lane, Hale Wharf and South Tottenham. Although it is recognised that this was not the Council's intention, the GLA is concerned that the Regeneration Area designation could allow significant retail development to occur in these locations. This would be inappropriate, and is not in general conformity with London Plan policy 2A.8.

31. To address this issue the Council is advised to refine the Regeneration Area policy to take account of the issues raised above, and/or to re-designate the above mentioned industrial locations. This will help to ensure general conformity with London Plan policy 2A.8.

32. The Council also is asked to consider whether the Willoughby Lane industrial area might be more appropriately designated as a Local Employment Area (Employment Location), rather than a Regeneration Area.

33. In summary, while the GLA supports Haringey's intention of managing and consolidating employment sites for regeneration and protection, further work and refinement is required to ensure general conformity of policy SP8 with the London Plan. GLA officers would welcome further discussion on the matters raised, and are keen to assist the Council in defining the Borough's SIL boundaries as required.

Housing

34. Following comments made at the previous consultation stage, the GLA welcomes the inclusion of further detail in the supporting text to policy SP2 in response to revised housing targets emerging in the draft replacement London Plan. However, the Council are also advised to reflect this consideration within the SP2 Housing policy box.

35. The Council are reminded that this policy will need to demonstrate at least a 10 year housing target, with a roll forward of a further 5 years to cover the 15 year plan period from the date of adoption. A number of possible revisions are proposed in Appendix 1 which the Council is advised to consider.

Affordable housing

36. Since the Pre-Submission consultation stage the Council has made a fundamental amendment to affordable housing policy within proposed core strategy policy SP2.

37. At the previous consultation stage Policy SP2 stated that schemes of five or more units should provide 50% affordable housing on site. However, the Council's Affordable Housing Viability Study (issued after the Pre-Submission consultation stage) recommends that the policy threshold is revised to ten units.

38. This revised threshold accords with London Plan policy 3A.11, and based on the findings of Haringey's Affordable Housing Viability Study, the GLA is satisfied that the revised unit threshold is appropriate and justified.

Legal considerations

24. All local development documents must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public and must include an opinion regarding general conformity with the London Plan. The test of general conformity is set out in Circular 1/2008 and states that LDDs should not be adopted unless they properly reflect the policies in the Spatial Development Strategy. The Circular states: *"The test is of general conformity and not conformity. In practice, this means that it is only where an inconsistency or omission in a development plan document would cause significant harm to the implementation of the spatial development strategy, that it should be considered to not be in general conformity."*

25. The Mayor's General Conformity Guidance Note (July 2006) confirms that the principle of general conformity applies to all policy areas of the London Plan and can apply to a single policy issue. The Guidance Note also confirms that the Mayor will make other comments on development plan documents to clarify and enhance policy implementation.

26. The fact that a development plan document is inconsistent with one or more policies in the spatial development strategy, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the spatial development strategy.

27. Any expression of opinion from the Mayor that the development plan document is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion *"will be given considerable weight"*¹ and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence.

28. GOL Circular 1/2008 (Strategic Planning in London) confirms that the Mayor's opinion on general conformity will be the starting point for consideration of a DPD by an Inspector to ensure the Mayor's policies are fully considered when draft DPDs are examined. Paragraph 4.5 states that *"The Inspector will be expected to recommend changes to the DPD in accordance with the Mayor's opinion unless there are sound planning reasons for not doing so."*

29. Under the new development plan system the Inspector's recommendations are binding on the local planning authority, and there is no subsequent modifications stage. Accordingly, the Mayor should set out which policies are not in general conformity with the spatial development strategy.

30. The Mayor must also state why the policy is not in general conformity and his reasoning behind that opinion. The Inspector will determine whether he or she supports the opinion and

¹ Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents (The Planning Inspectorate, 2005), paragraph 1.2.6

recommend accordingly. The Mayor should provide the Inspector conducting the examination with any necessary additional information as appropriate, either through a representative or in writing according to the requirements of the Inspector. The examination in the present case is due to be held in May 2011.

Conclusion

31. While proposed Core Strategy policy SP2 is broadly consistent with the London Plan, Core Strategy policy SP8 raises general conformity issues in relation to: the identification of Strategic Industrial Locations, and the potential for significant retail development outside of town centres. The DPD is, therefore, not in general conformity with the London Plan for the reasons highlighted in the Employment section of this report. These issues should be addressed, along with the other comments in this report and the associated appendix, prior to submission of the Core Strategy.

For further information, contact the Planning Decisions Unit

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London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation) Appendix One

Representations from the Mayor of London		Consultation period: 4 November – 2 December 2010
GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.
		Representations

Core Strategy (additional Regulation 27 consultation on affordable housing and employment land designations) SP 2 Housing		
1.	SP 2 Housing Policy box, para 1	<p style="margin: 0;">3A.2 DR London Plan 3.3</p> <p style="margin: 0;">Following comments made at the previous consultation stage, the GLA welcomes the inclusion of further detail in paragraph 3.2.4 in relation to revised housing targets emerging in the draft replacement London Plan. However, the Council are also advised to reflect this consideration in the first paragraph of the SP 2 Housing policy box.</p> <p style="margin: 0;">The Council are reminded that the policy will need to demonstrate at least a 10 year housing target, with a roll forward of a further 5 years to cover the 15 year plan period from the date of adoption. A number of possible changes to paragraph 1 of the SP 2 Housing policy box are proposed below for the Council to consider. Examples 3 or 4 are recommended, as these solutions offer the greatest flexibility and longevity in response to revised future targets.</p> <p style="margin: 0;">Nb. Proposed changes to existing text are <u>underlined</u>, the Council may also need to account for these changes in the policy's supporting text.</p> <p style="margin: 0;">Example 1</p> <p style="margin: 0;">The Council will aim to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet <u>and</u> exceed the target of 10,200 homes from 2011/12-2025/26 (680 units per annum).</p> <p style="margin: 0;">Example 2</p> <p style="margin: 0;">The Council will aim to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet <u>and</u> exceed the target of 6,800 homes from 2011/12-2020-21 (680 units per annum) <u>and</u> an additional indicative target of 3,400 from 2020/21-2025/26.</p>

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation)

Appendix One

Representations from the Mayor of London

Consultation period: 4 November – 2 December 2010

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
			<p>Example 3</p> <p>The Council will aim to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the target of 10,200 homes from 2011/12-2025/26 (680 units per annum) until a new housing target is adopted by the Mayor in his replacement London Plan which the Council will meet and exceed thereafter.</p> <p>Example 4</p> <p>The Council will aim to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the target of 6,800 homes from 2011/12-2020-21 (680 units per annum) and an additional indicative target of 3,400 from 2020/21-2025/26, until a new housing target is adopted by the Mayor in his replacement London Plan which the Council will meet and exceed thereafter.</p>
2.	SP 2 Housing Policy box, point 5	3A.11 DR London Plan 3.14	<p>In view of the findings of the Haringey's Affordable Housing Viability Study the Council has revised the unit threshold for the 50% affordable housing provision target, from 5 units to 10. This threshold level accords with London Plan policy 3A.11, and based on the findings of the above study the GLA is satisfied that the revised unit threshold is justified.</p> <p>The inclusion of additional text within the policy box detailing that housing schemes below the 10 unit threshold will be required to provide a 20% provision, or provide financial contributions towards affordable housing provision, is welcomed.</p>

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation) Appendix One

Representations from the Mayor of London Consultation period: 4 November – 2 December 2010

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
SP 8 Employment			
3. SP 8 Employment, Policy box	2A.10, 3B.4 DR London Plan 2.17		<p>The GLA notes that the Council has revised the list of Strategic Industrial Locations (SILs) within the SP 8 policy box to introduce further detail. The principle of identifying the specific industrial estates by name to provide greater clarity is welcomed, however, the GLA notes there are inconsistencies with the locations identified here, and those designated as SILs in the London Plan. These are set out below under the relevant headings.</p> <p><u>Tottenham Hale</u></p> <p>The London Plan does not identify the industrial location at Lindens / Rosebery Works as SIL. However, if the Council wish to incorporate these industrial locations as part of the wider Millmead SIL the GLA would support that, and would welcome further discussion on the matter.</p> <p>Given that the Council intends to introduce greater detail, it should ensure that the industrial location at the Millmead Industrial Estate is recognised as SIL, as part of the wider Tottenham Hale designation. The Council is, however, asked to have consideration to the comments detailed under item 15 of this appendix, when defining the SIL boundary in this location.</p> <p><u>Part of Central Leaside</u></p> <p>The London Plan does not identify the industrial location at Marsh Lane as SIL. However, if the Council wish to incorporate this industrial location as part of the wider Central Leaside SIL the GLA would support that, and would welcome further discussion on the matter.</p>

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation)

Appendix One

Representations from the Mayor of London

Consultation period: 4 November – 2 December 2010

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
4.	SP 8 Employment, Policy box	2A.10, 3B.4 DR London Plan 2.17	<p>General conformity issue</p> <p>The GLA notes that the Council has revised the list of Locally Significant Industrial Sites (LSIS) to include the Millmead/Ashley Road Extension industrial area.</p> <p>The Council are advised that the Millmead industrial area forms part of the wider Tottenham Hale Strategic Industrial Location (please refer to the indicative map in North London Sub-Regional Development Framework for reference). While the GLA would potentially accept a change in the status of the Ashley Road industrial area (refer to comments under items 15 and 16 of this appendix), the SIL designation for Millmead must be reflected by policy SP 8 in order for it to be in general conformity with the London Plan.</p> <p>The Council are therefore advised to remove the Millmead industrial area from the list of LSISs. With regard to the list of LSISs within policy SP 8, the Council should remove the reference to Lindens/Roseberry Road if it intends for these areas to be designated as SIL. (Refer to comments under item 3 of this appendix).</p> <p>On reading the supporting text appended to policy SP 8, it appears the Council is introducing a new 'Regeneration Area (RA)' designation within the existing Local Employment Areas policy.</p> <p>Having had regard to page 22 of the consultation material it would appear that the policy approaches within RA designations differ significantly from those of the existing Local Employment Areas. However, when cross referencing with policy SP 8 the GLA notes that the policy does not define the differences between these designations.</p> <p>To ensure this policy retains its internal continuity in light of the new RA designation, the Council must define the RA policy approach within the SP 8 policy box.</p>
5.	SP 8 Employment, Policy box	2A.10, 3B.4 DR London Plan 2.17	
6.	SP 8 Employment, Policy box	2A.10, 3B.4 DR London Plan 2.17	

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation) Appendix One

Representations from the Mayor of London		Consultation period: 4 November – 2 December 2010	
GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
7.	SP 8 Employment, para 5.1.4 SP 8 Employment, para 5.1.10	3B.4 DR London Plan 2.17 3B.4 DR London Plan 2.17	Further to the proposed amendment it is recommended that clarification is given on the criteria that will be used to determine whether a site is no longer suitable for industrial or other employment generating use, and how release of industrial land will be managed. The list of uses should match those identified in the policy, that is B1(b), (c), B2 and B8. Suggest insert 'B1(b), (c)' in second line of para 5.1.10.
9.	Indicators to monitor the delivery of Policy SP8	3B.4 DR London Plan 2.17	Given that Policy SP8 covers all B uses, the first indicator ought not be restricted to just B1. Suggest that net and gross changes in B1a, b, c, B2 and B8 floorspace are monitored to reflect new business space and improvements to existing business space, including industrial and warehousing.
10.	Review of Haringey's Employment Land Designations, page 22	2A.8, 2A.10, 3B.4 DR London Plan 2.17, 4.17	Page 22 of the consultation material describes Local Employment Areas (EL) as suitable for a wider range of employment uses including a "small element of retail and food and creche/nursery". This is supported as a general principle, however, it is recommended this is re-worded as: "small scale 'walk-to' retail, cafes and crèche/nursery". This is to ensure that the retail element is genuinely small in scale, accessible on foot, and does not compromise London Plan policy to encourage retail development within, or at the edge of town centres, and discourage it outside of town centres.
11.	Review of Haringey's Employment Land Designations, page 23	2A.8, 2A.10, 3B.4 DR London Plan 2.17, 4.17	General conformity Issue Page 23 of the consultation material identifies a new "Regeneration Area (RA)" designation within the Local Employment Area policy context. It is understood this designation is intended to introduce a flexible approach, and could include mixed use development, including retail. While the principle of mixed use regeneration of certain areas of local employment land would be supported in principle, the GLA has concerns with how this designation has been defined (refer to comment 6 of this appendix), and with regard to a number of the areas identified on the Core Strategy Defined Employment Areas map. The following RA locations are in out of centre locations: Willoughby Lane, Hale Wharf and

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation)

Appendix One

Representations from the Mayor of London

Consultation period: 4 November – 2 December 2010

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
			<p>South Tottenham. As such, significant retail development in these locations would not be appropriate. This approach, therefore, needs further refinement to ensure general conformity with London Plan policy 2A.8.</p> <p>The GLA seeks further discussions with the Council to determine how the sites identified can help to secure an integrated town centre at Tottenham Hale, in accordance with London Plan policy 2A.8 and 3D1.3, and emerging policy in the Draft replacement London Plan.</p> <p>It is noted that page 22 of the consultation material uses the term “Local Strategic Industrial Locations” to describe local industrial sites of significant importance. The GLA considers that this phrase is likely to cause confusion. The Council is, therefore, recommended to reflect the terminology of Core Strategy Policy SP 8, which uses the phrase “Locally Significant Industrial Sites”.</p>
12.	Review of Haringey’s Employment Land Designations, page 22	2A.10, 3B.4 DR London Plan 2.17	
13.	Designated Employment Areas Schedule, pages 24-28	2A.10, 3B.4	<p>Ref 1. Crusader – should be designated as LSIS not SIL. Ref 10. Lindens/Roseberry Road - on its own is not of strategically significant scale, but may merit SIL designation in conjunction with Millmead. Ref 11. Millmead/Ashley Road Extension. Millmead is part of the existing SIL (please refer to existing indicative map in North London SRDF) and is strategically significant in scale. It should be incorporated in the SIL designation. Ashley Road extension may not merit SIL designation if the regeneration proposals for Tottenham Hale incorporate this site as part of a mixed use development – further discussions with GLA are welcomed on this matter. Ref 19: Wood Green (northern area). GLA support LEA-EL designation. Note that this is currently designated as SIL in LP2008, but is proposed for de-designation in the draft replacement London Plan (no objections were raised in relation to this at the DRLP EIP).</p>

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation) Appendix One

Representations from the Mayor of London

Consultation period: 4 November – 2 December 2010

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
14.	Core Strategy Defined Employment Areas map, page 30	2A.10, 3B.4 DR London Plan 2.17	<p>Location 11: Millmead/Ashley Road Extension, N17</p> <p>The GLA welcomes the fact that the Millmead employment site has been identified for protection. However, this area should reflect the London Plan designation as a Strategic Industrial Location (SIL), rather than the Local Strategic Industrial Land (LSIL) designation indicated. With reference to the Ashley Road industrial location the Council are also asked to give consideration to the comments detailed under item 15 of this appendix.</p>
15.	Core Strategy Defined Employment Areas map, page 30	2A.5, 2A.10, 3B.4 DR London Plan 2.13, 2.17	<p>Location 11: Millmead/Ashley Road Extension, N17</p> <p>The Council is asked to have regard to the emerging Upper Lee Valley Opportunity Area Planning Framework (OAPF) when forming the boundary for the SIL designation in this area. Steering group discussions for the OAPF, involving both the Council and the GLA, have identified a portion of this SIL for managed release. The principle for this approach has been based on employment studies by both the GLA and the Council, and represents a coordinated approach to delivering local and strategic objectives for the Upper Lee Valley. The Council is, therefore, asked to reflect this approach as part of this designation.</p>
16.	Core Strategy Defined Employment Areas map, page 30	2A.5, 2A.10, 3B.4 DR London Plan 2.13, 2.17	<p>For clarity, the draft Upper Lee Valley OAPF identifies a 10 ha portion of SIL, including the Ashley Road industrial area, as suitable for managed release. GLA officers would welcome the opportunity to assist the Council in defining the revised SIL boundary as required.</p> <p>Location 15: Tottenham Hale</p> <p>In view of the emerging Upper Lee Valley OAPF, the GLA accepts the principle of designating this area of SIL as a Regeneration Area (RA) in order to facilitate regeneration and mixed use redevelopment to support an integrated town centre at Tottenham Hale.</p> <p>The Council is advised to adopt the same approach for the area of SIL at Ashley Road, in accordance with the aspirations of the emerging Upper Lee Valley OAPF.</p>

London Borough of Haringey – Core Strategy (Additional Regulation 27 consultation)

Appendix One Representations from the Mayor of London Consultation period: 4 November – 2 December 2010

GLA Ref. No.	Issue/ Option para/page	London Plan Policy cross ref.	Representations
17.	Core Strategy Defined Employment Areas map, page 30	2A.10, 3B.4 DR London Plan 2.17	The use of the term “Local Strategic Industrial Land” on the legend for the defined employment areas map is likely to cause confusion. It is recommended that the key is revised to reflect the terminology of Core Strategy Policy SP 8, which uses the phrase “Locally Significant Industrial Sites”.