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LDF Representation

Former Cannon Rubber Factory, 881 High Road,
Tottenham

Prepared for:

Newlon Housing Trust

(5)

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1. Introduction

- 1.1 On behalf of our client, Newlon Housing Trust (NHT), we have set out below representations to the Inspector's table of Main Modifications (ref number PE-28) that was sent to the London Borough of Haringey (LBH) on 22nd August 2012 in respect of the Haringey Local Plan: Strategic Policies. The representation considers the letter (ref number PE-29) to the LBH from the Inspector on 24th August 2012 (this letter summarises the reasoning for Modification 28 which relates to Policy SP8 (Employment)), and also the associated amendment which affects Designated Employment Area (DEA) 9 (High Road West). Our clients' interest relates to the former Cannon Rubber Factory site which is identified on the site plan at **Appendix 1**. DEA9 actually comprises two separate sites (a north and south site) (**Appendix 2**). The sites are separated by a supermarket, which is not designated. The two sites can therefore reasonably be considered as separate elements and do not need to be considered as one entity. The Cannon Rubber Factory site (hereafter referred to as 'the site') comprises the northern part of DEA9 and this representation focuses on this part of the designation only.
- 1.2 If Modification 28 is accepted, the site will be retained within a 'Locally Significant Industrial Site' (LSIS), where *"The Council will safeguard the...[site]...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."* This would be contrary to the Mayor of London's proposal to remove this designation as identified within the draft Upper Lea Valley Opportunity Area Planning Framework (November 2011), which is scheduled for adoption later this month/next month.
- 1.3 The Inspectors reasoning for the Modification is provided in his letter dated 24th August 2012 which states:

"I have been mindful of the Mayor of London's Industrial Land Capacity SPG and the Council's Document Ref CSSD-03a which refers to the post consultation changes of some of the 22 DEA sites within the employment land hierarchy. I have also noted, amongst other matters, the Council's Cabinet Report which indicates that the changes to DEAs arose from the responses to the Local Plan consultation exercise undertaken in May and June 2010. In summary however, there is no robust or consistent analysis of each DEA, for example in relation to their context, content or function, nor a clear assessment as to why individual designations should be altered. There is no sound analytical basis for creating new Locally Significant Industrial Sites at this time. If necessary, the Council's intended Sites Allocation DPD would provide a suitable opportunity to robustly assess the DEAs of the Borough and to alter their specific

designation if warranted to ensure the aims of Policy SP8 are secured. This would accord with the thrust of the NPPF to secure regular reviews of site allocations.

Document ref CSSd-03a and the Employment Land Study (2012 update) provides further descriptions of the various Local Employment Areas of the borough and would seem to provide an assessment of each area and its context. However, the basis for each description is unclear, for example whether any recent land use survey has been undertaken and if so the detailed results, which may include uses and vacancy rates. In the interests of consistency, the available evidence does not support adequately the proposed changes to these DEAs in this regard."

- 1.4 It is noted that the Inspector refers to the Mayor of London's old Supplementary Planning Guidance (SPG) which was replaced in September 2012 following the publication of the Land for Industry and Transport SPG.
- 1.5 The representation objects to the retention of the site as a LSIS and requests that the site is re-designated as a Local Employment Area (LEA) as proposed by the Council, for the reasons we set out in this representation. This would be consistent with the Mayor of London's proposals to remove the LSIS designation from the site, as outlined within the draft Upper Lea Valley Opportunity Area Planning Framework (OAPF) (November 2011) which is scheduled for adoption in October/November 2012 (**Appendix 3**).
- 1.6 We provide some background on the site in Section 2, before providing our representations in Section 3. In Section 4, we provide a summary of the emerging proposals for the site which have been developed following extensive pre-application discussions with the Council, GLA and key stakeholders; and our summary and conclusions are provided in Section 5.

2. The Site

- 2.1 The site is located on the western side of the High Road in the London Borough of Haringey, close to the northern boundary with the London Borough of Enfield. The site falls just outside of the North Tottenham Conservation Area, which is located along the High Road to the east. The site is bounded by Langhedge Lane Industrial Estate to the north, Langhedge Lane to the northeast, a bus stand and High Road (A1010) to the east, Sainsbury's Supermarket to the south, and a National Rail railway line to the west. The total site area is 1.04 hectares.
- 2.2 The site is vacant. There were 4 large rectangular industrial buildings on the site; all of which were brick built and had ridged roof formations. Two of the buildings on the site were demolished earlier this year by the previous owners, and the remaining buildings are in the process of being demolished as they are not fit for purpose. The buildings were dated and not suited to modern industrial occupiers or modern industrial working practices.
- 2.3 Formerly located on the site was the Cannon Automotive Ltd company who acquired the site in 1995, under their former company name, 'The Cannon Rubber Manufacturers Ltd'. The company was originally a general rubber goods company, producing products as diverse as rubber hot water bottles, rubber shoe soles and natural rubber baby bottle teats. In the late 1950s they began to produce car mats for leading car manufacturers. Over the last few years the company wound down their manufacturing operations and moved these to China with the majority of staff transferred off site. When the site was purchased by our client in 2012, only 5 members of office staff remained. All manufacturing operations had ceased.
- 2.4 The surrounding area is predominantly residential. There is a small industrial estate to the north but beyond this the area is predominantly residential with a mixture of 4 and 5 storey flatted blocks and 2 and 3 storey terraces. A 9 storey residential block sits on the junction of the High Road with Fore Street adjacent to the site to the north. Across the High Road to the east is another predominantly residential area containing a 19 storey residential tower block known as Stellar House and a number of surrounding 3 storey terraces.
- 2.5 The site has a good Public Transport Accessibility Level (PTAL) rating of 4. The site is located within approximately 500 m walk from White Hart Lane station which provides services to Liverpool Street, Enfield Town and Cheshunt stations. There are a number of buses which also operate along the High Road.

3. Representations

Tests of Soundness

3.1 The National Planning Policy Framework (NPPF) (March 2012) requires that for a local plan to be found sound it should be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

3.2 We consider the Inspectors Modification against these tests below. It should also be noted, that in addition to the plan making requirements, the NPPF sets out the Government's overarching planning policies. Particularly relevant to this representation is Paragraph 22 which states:

"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

3.3 For the reasons explained below, it is considered that the site has no reasonable prospect of being used for industrial purposes or for a wholly employment use. In order for the plan to be sound, the policies within the Local Plan must be consistent within the NPPF; therefore, the site should no longer be protected for industrial or wholly employment uses.

Representations

3.4 The LBH published the Affordable Housing & Employment Land Designations (September 2011) which explained that *"The northern section of this DEA is located on Tottenham High Road (A1010) within a predominantly residential area. It is served well by rail (National Express East Anglia lines from White Hart Lane or Northumberland Park station) and is in close proximity to North Circular Road (A406). There are four main units in this section, three of which are vacant. The single occupied unit falls within the B8 use class, but is soon to become vacant."* The document also states that in the northern part of the DEA, *"...B use industries have been significantly less successful..."* The LBH Employment Land Update (February 2012) also acknowledged that this part of the DEA consists of *"average quality buildings"* in a *"low intensity storage use"* (section 7.5).

3.5 Given the decline in industry in this location and also the wider aspirations to regeneration the area within which the site sits, the draft Mayor of London OAPF also considers and supports the release of the site from the LSIS designation. The following extracts are taken from the draft OAPF:

- *"The opportunity area contains a significant amount of industrial land and is an important component of the London-Stansted-Cambridge-Peterborough growth corridor. However, the recent decline in some manufacturing sectors has resulted in an oversupply of industrial units which are no longer suitable for contemporary industrial users. The retention and renewal of the protected industrial land is therefore an important element to the success of the Upper Lee Valley."* (Executive Summary, page vi)
- *"The Mayor's Industrial Capacity supplementary planning guidance (2008) commits the Mayor to work with boroughs and other partners to plan, monitor and manage the release of surplus industrial land so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal."*

Enfield, Haringey and Waltham Forest Councils have published detailed employment land studies that have informed and fed into their emerging local development framework documents. Using this analysis and overlaying this on the context of the Upper Lee Valley area, the Greater London Authority working with the boroughs have assessed the need for employment land release in the Upper Lee Valley. This work built a clear picture as to where strategic industrial land should be released or more intensively/effectively used through a consolidation process.

As a result some of the strategic industrial locations and local industrial locations in the opportunity area have been identified for mixed-use intensification given their good public transport accessibility and the opportunities they provide to improve links to the Lee Valley Regional Park. These are identified as the growth areas of Tottenham Hale and Blackhorse Lane, Central Leaside and Ponders End.

In addition some existing locally significant sites such as Marsh Lane and Lindens/Roseberry Works have been designated as strategic industrial locations, moving them up the policy hierarchy in terms of protection for industrial use. This results in an overall net gain of strategic industrial locations in the opportunity area of 14.2 hectares which is within the parameters identified in the Mayors industrial land SPG.

With the exception of the loss of the locally significant industrial land around Northumberland Park and the Tottenham Hotspur Stadium, these changes are already reflected in boroughs local development frameworks and will enable the boroughs' growth and regeneration agendas to be met whilst ensuring that sufficient strategic industrial capacity is maintained in order to support London's economy.

The strategic industrial location designations are shown in fig. 2.12. In accordance with London Plan policy 4.4 which affirms a rigorous approach to industrial land management these locations will be safeguarded and retained. The introduction of non-industrial uses would compromise the function of strategic industrial land. As such the redevelopment of these industrial locations for non-compliant uses will be strongly resisted by both the Greater London Authority and the boroughs." (Page 22)

- *"...The area contains some important strategic industrial land in the east. To the west along the High Road some areas are underused or dilapidated offering the opportunity for rationalisation..." (Page 152)*

3.6 In December 2011, the GLA also published further evidence to support the release of industrial land in London in general. The 'Industrial Land Demand and Release Benchmarks in London' concludes that there will be a reduced demand for industrial land in London over the period 2011-31, and this would enable the release of 470 ha of land (paragraph 12.19). When taking account of supply and demand figures, the authors of the study estimate that over the period 2011-31 London can release a 733 ha of industrial land (paragraph 12.24).

3.7 Taking account of the above evidence, the release of a limited amount of industrial land is considered to be acceptable and for this site, it is supported by the Mayor of London in the draft OAPF. It is understood from recent correspondence from the GLA that the OAPF is due to be adopted later this month/early next month, and that the proposed release of the site from the

LSIS designation remains part of the Mayors policy position. The retention of the LSIS designation on this site is therefore not justified, would not be effective and would be contrary to paragraph 22 of the NPPF. The policy would therefore not be sound.

3.8 It is noted that since the Councils evidence base was produced, the site has become fully vacant. The former company wound down their manufacturing operations and moved off site. They also transferred the majority of their staff. When the site was purchased by our client in 2012, only 5 members of office staff remained. The dated buildings did not meet the needs of modern industry and business. They have been partly demolished, with the remainder in the process of being demolished.

3.9 As noted above, as a result of the decline in industry in this location generally and also on the site, both the Mayor (through the Upper Lea Valley Opportunity Area Planning Framework) and the local authority (through the Local Plan) are looking to remove and amend the employment designations that currently exist on the site. The UDP allocates the site within 'Defined Employment Area 9', a defined 'Industrial Location'; however, the emerging policies sought to loosen the protection on the site and designated the site as a 'Local Employment Area – Employment Land'. The Inspectors Modification would result in the site being retained as a LSIS; however, the site is no longer considered to be suitable for a industrial use, and in the interest of sustainable development in accordance with the NPPF, the Council's proposed approach to re-designate the site would allow flexibility to take account of market signals and viability. This would be consistent with national policy, and would allow for a more effective plan that can help to deliver the regeneration of the Northumberland Park area.

3.10 This site is of strategic importance in unlocking the regeneration of the wider area, as it is highlighted as the first site for redevelopment in the recently published 'Plan for Tottenham' (included at **Appendix 4**). During pre-application discussions with the GLA about the redevelopment of this site, the GLA have welcomed the regeneration of the site, and confirmed this within their pre-application advice note (paragraph 13) dated 21st June 2012. This is consistent with their policy aspirations for the site.

3.11 Currently, UDP Policy EMP2 seeks to protect industrial uses in the Defined Employment Areas (DEAs); UDP Policy EMP4 relates to the change of use of land in employment generating use, and states that planning permission will be granted for the change of use to non-employment generating uses where:

- *"The land or building is no longer suitable for business or industry on environmental, amenity and transport grounds in the short, medium and long term; and*

- *There is well documented evidence of an unsuccessful marketing/advertisement campaign, including price sought over a period of normally 18 months in areas outside the DEAs, or 3 years within a DEA; or*
- *the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits."*

3.12 As noted, the existing industrial use on the site had been winding down for a number of years because the previous owners found the site to be unsuitable for continued use as an industrial site. There has been a general decline in industry in this location and given the wider regeneration aspirations for the Northumberland Park area (which are also outlined in policy documents), the designation of the site as an LEA will ensure that employment is retained on the site through the creation of new jobs associated with other types of employment use. This would comply with UDP Policy EMP4. The number of jobs on the site historically is unknown; however, in 2012 only 5 members of office staff remained on the site and there were no industrial activities being undertaken on the site. The retention of the site within a LSIS is not justified, and by allocating the site as an LEA, it will facilitate better quality employment uses that can contribute towards the regeneration of the area.

3.13 Paragraph 5.30 of the UDP states that *"Where redevelopment or re-use would not give rise to a material loss of employment due to increased density or labour intensive operations, non-employment generating uses may be appropriate"*, subject to compliance with other policies of the Plan. *"The contribution to wider regeneration objectives will be a factor in assessing the proposed redevelopment of the employment sites. Wider regeneration benefits and objectives are defined in paragraphs 4.13, 4.16, and 4.18 in Part 1 of the Plan"*. Paragraph 4.13 identifies the Northumberland Park area as a 'Priority Area', where the main objectives include an opportunity for large-scale redevelopment to address the area's deprivation; environmental management; creation of a high quality environment and sense of place; improved access to jobs and supporting a variety of regeneration initiatives; encouraging a greater choice of housing encouraging more trees and improved public spaces etc. The regeneration objectives for the area remain important to LBH and the Mayor of London, and the re-designation of the site would enable alternative uses which would contribute more effectively to these wider objectives by allowing for the delivery of viable uses such as residential, employment and community uses. Jobs would still be retained on the site in this way.

3.14 Following the riots of August 2011, the importance of regenerating and transforming Tottenham has come to the forefront of the LBH and Mayor's aspirations for the area. This is evidenced by the recent publication of the 'Plan for Tottenham' which has been prepared by LBH in partnership with the Tottenham Taskforce. The taskforce comprises: Councillors, Sir Stuart

Lipton (Mayor of London's Tottenham Champion); the MP for Tottenham; the Executive Director Development and Environment Greater London Authority; and other community leaders and business experts. The regeneration of the area is therefore a priority that the Plan seeks to deliver and in order to be effective, the site should be re-allocated as a LEA.

Criteria for the Release of Industrial Land

- 3.15 The Mayor's Land for Industry and Transport SPG (September 2012) encourages boroughs to designate Locally Significant Industrial Sites. These are sites which are outside Strategic Industrial Location (SILs), which should be reviewed regularly and justified. The site is not important for local industrial functions as it is vacant and the industrial operations on the site have been winding down for a number of years. Manufacturing operations were transferred to China and the site has been in the process of being wound down from an operational facility over the last few years. In 2012 only 5 office staff remained on the site and no manufacturing operations were being undertaken. The retention of the site within a LSIS is therefore not justified and the retention of the LSIS allocation would not be effective.
- 3.16 Paragraph 4.11 of the SPG provides three sets of criteria that can be used when considering site specific allocations for industrial land in DPD's. Each of the criteria is considered below and this exercise demonstrates that this specific site should be released from its LSIS designation. In accordance with paragraph 22 of the NPPF, the long term protection of the site for industrial use should be removed to allow flexibility so that market signals and the relative need for different land uses to support sustainable local communities can be taken into account.

<i>Economic criteria, including whether a site:</i>	meets demonstrable local short term demand for industrial development, and / or strategic long term demand	The industrial buildings on the site were dated and not fit for modern industry or business operations. The location of the site is not suited for industrial uses given the predominantly residential character of the area.
	offers potential for the in-situ expansion of existing industrial businesses	The existing business has vacated the site and has been winding down operations for a number of years. There is little scope for the expansion of the industrial uses on the site because of the relatively constrained size and location of the site.
	supports local or strategically important clusters of employment or industrial activity	As already noted the site is isolated and does not form part of a cluster of industrial uses. The other larger area designated to

		the south is separated from the site. There are small scale industrial uses to the north; however, the predominant character of the area is residential.
	is viable for industrial development having regard to other criteria in paragraphs 4.14 to 4.16 and the value of the land in its existing (industrial) use	The site is not viable for industrial development given its isolated location in a predominantly residential area.
	meets demand and addresses the particular needs of waste management, recycling, utilities (energy and water management) and land for transport	The site does not meet a specific demand and it does not and cannot address the need for a waste management, recycling, utilities or transport function given its isolated location within a predominantly residential area. The site is not suited for these types of uses.
	meets demand for new or emerging industries including green industries and those which support innovation and research	The site is vacant and does not meet a demand for green industries. It does not form part of a cluster and it would be unviable to redevelop the site.
	is well located to take advantage of existing or proposed infrastructure or economic development / regeneration funding	Although the site is located close to an A Road, it is in a residential area. It is not suited for industrial use and it does not benefit for funding for continued economic use.
	offers potential for the provision of industrial units for creative, knowledge-based, high technology and Small and Medium Sized Enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area	The site is vacant and it would be unviable to redevelop the site. The wider masterplan that the Council are developing is understood to be providing for employment uses in more appropriate locations i.e. adjacent to the railway line. The emerging proposal for the site does include B use class floorspace and this can provide accommodation for SMEs.
	is needed to accommodate provision for transport in terms of London Plan policy and Mayoral guidance on provision for transport and safeguarding river related uses, for example, bus garages, rail depots, interchanges and terminals, wharves, boat yards and inter-modal sites;	The site is not needed to accommodate provision for transport or river related uses. The site is not suited for these uses.
	provides lower cost industrial accommodation suitable for small, start-up, or lower-value industrial uses or other industrial related businesses important to	The site is vacant and the dated buildings have been demolished because they were no longer fit for purpose. It would be unviable to redevelop the site for industrial

	the local economy	use.
<i>Land use criteria, including whether a site:</i>	is well located in relation to the strategic highway network or local highway network, in particular causing minimal traffic impact in residential areas	The site is located in a predominantly residential area; therefore, an industrial use would have an unacceptable traffic impact.
	is well located in relation to the rail, river or canal network including inter-modal rail heads and safeguarded wharves, offering potential for transport of goods by rail and/or water transport	The site is not well located in terms of potential for the transport of goods by rail and/or water.
	is well located in relation to the Central Activities Zone, town centres and/or public transport facilities, recognising that many industrial activities have relatively low trip generation and that other land uses (such as offices, leisure and retail) may be more appropriate in locations with high public transport accessibility	The site is not located in the CAZ or in a town centre. The site has a PTAL of 4 and has good access to public transport links; therefore, the site is more suited to other land uses including residential, other employment and community uses.
	is part of a larger cluster of existing industrial activity, or area designated for industrial protection including SILs and LSIS, where re-designation of the industrial site would alter the industrial character of the area or inhibit the operations of nearby industrial uses	The site does not form part of a larger cluster of existing industrial activity, and the re-designation of the site would not alter the character of the area, because an industrial character does not prevail in the area.
	offers potential for 24-hour working, or provides facilities for 'bad neighbour uses' (by virtue of issues including, for example, noise, access, traffic generation, hours of operation, lighting and air quality) without detriment to residential amenity, being well screened from neighbouring uses, particularly residential areas	The site does not offer potential for 24 hour working given that there are residential uses in close proximity that would be impacted on by noise, traffic generation, lighting, air quality etc. The site is also not well screened from residential areas because it is in a prominent location along the High Road.
	offers potential for waste management or recycling uses	The site does not offer potential for waste management or recycling uses given the predominant residential character of the area.
	offers potential for space intensive activities which do not fall within the ambit of this SPG and would not, in this location, compromise wider planning objectives	The site is not suited for intensive industrial activities given the predominantly residential nature of the area.
	provides sufficient space for adequate operational parking and turning space for goods vehicles (see London Plan Policy	The site does provide space for parking and turning spaces; however, the impact of traffic associated with industrial uses

	6.13 and Part B of this SPG)	would have an unacceptable impact on the character of the residential area.
<i>Demand based criteria including whether site</i> a	has been adequately marketed through a commercial agent at a price that reflects market value for industrial use for a reasonable period (normally at least two years), with appropriate lease terms and offered with potential for redevelopment of derelict or obsolete industrial premises where this is required to meet the needs of modern industrial users; (For LSIS and other non-designated sites, boroughs may wish to adopt different marketing criteria according to local circumstances.)	The site has not been marketed for a commercial agent; however, as already explained it is considered that the site is no longer suitable for an industrial use; therefore, there is likely to be little demand for the continued use of the site for industrial uses. This would also conflict with the regeneration objectives for the Council explained in the UDP, emerging Local Plan and Plan for Tottenham.
	has been vacant for a considerable period (normally at least two years, and up to five years in areas of generally strong demand), without realistic prospect of industrial re-use	The site is vacant and the former business on the site had been winding down for a number of years. It is understood that the site has not been used for industrial operations for a number of years.

3.17 Taking account of the above the retention of the site within an LSIS is not justified; would not be effective; and would not be consistent with national planning policy. The policy would therefore not be sound. We therefore ask that the Inspector revokes this Modification and accepts that the site should be re-designated to provide flexibility in the release of the site to alternative sustainable uses that would better facilitate the regeneration of the area.

4. Site Specific Pre-Application Discussions

- 4.1 In line with the Council's vision and aspirations for the area, NHT are at an advanced stage of pre-application discussions with the Council and also the GLA about optimising the potential of the site. High quality regeneration proposals have been devised for the site following extensive discussions with both authorities and also key stakeholders. The development proposals comprise a predominantly residential scheme; however, B class employment and a new 2 form entry primary school are also proposed. The site will eventually form part of a wider masterplan area (Northumberland Park).
- 4.2 The emerging development proposals will seek to make efficient use of the vacant site providing for a high quality modern development including a tall building which will enable the regeneration of the wider Northumberland Park area, thereby delivering a sustainable development, in accordance with the NPPF, London Plan Policies, UDP Policies G1, G2, AC3, UD2 and emerging Local Plan Policies.
- 4.3 The former configuration of buildings on the site represented an inefficient use of land. This goes against the principles of sustainable development that are promoted by the NPPF, The London Plan and the LBH adopted and emerging policies. The Transport Assessment demonstrates that the site has an average PTAL rating of 4, which indicates good public transport accessibility links to and from the site. Furthermore, the existing buildings had fallen into disrepair and did not meet the requirements of modern industrial/commercial occupiers. For this reason, the redevelopment of the site is considered to be a sustainable solution, particularly taking account of the aspirations of the GLA and LBH to regenerate the area as outlined within the 'Plan for Tottenham' (August 2012). The regeneration of Northumberland Park is also supported by UDP Policy G12, which identifies the area as a 'Priority Area', and UDP Policy AC3 which promotes regeneration in the 'Tottenham High Road Regeneration Corridor', within which the site falls.
- 4.4 The emerging Local Plan recognises the deprivation prevailing in the neighbourhood in discussing the 'White Hart Lane and Northumberland Park Neighbourhood'. The Key Diagram of the emerging Local Plan also allocates the site within the wider 'Northumberland Park Area of Change', where the Council promote development in accordance with draft Policy SP1.

4.5 Following the riots of summer 2011 which had a significant impact on Tottenham, the Plan for Tottenham outlines that LBH are determined to work with partners, businesses and local residents to build a better Tottenham. The site, referred to as 'Brook House', is identified within the 'Northumberland Park Opportunity Area' as the first site to bring forward the development of new housing, a school and other community uses, prior to a comprehensive masterplanning exercise being undertaken on the wider Northumberland Park area. In the knowledge of this, our client and their design team have over several months been refining the proposals for Brook House to ensure that they sit within and complement the aspirations for the wider masterplan. The scheme has evolved, having been designed to respond to the comments raised by the LBH, the GLA and their masterplanning team.

4.6 The emerging Local Plan includes a policy that sets a 'Presumption in Favour of Sustainable Development' and this states:

"The Council will always work proactively with applicants to find solutions, which mean that proposals can be approved wherever possible and to secure development that improves the economic social and environmental conditions in Haringey. Planning applications that accord with the policies in Haringey's Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."

4.7 Our client has worked proactively with the LBH, and the GLA, to develop an appropriate design solution for the site to secure a development that will deliver significant economic, social and environmental benefits to the local area. The proposals will unlock the regeneration potential of the wider masterplan and will deliver significant planning benefits. The Council's re-designation of the site to LEA is justified in respect of this site; and it is effective because a mixed use redevelopment can viably be delivered on the site. The re-designation of the site would also be consistent with national planning policy. We therefore respectfully ask that the Modifications suggested by the Inspector in respect of the former Cannon Rubber Factory site, which forms the northern part of DEA9 should not be adopted.

5. Summary and Conclusions

- 5.1 On behalf of our client, Newlon Housing Trust, we have set out our representations to the Inspector's table of Main Modifications (ref number PE-28) that was sent to the London Borough of Haringey on 22nd August 2012 in respect of the Haringey Local Plan: Strategic Policies. The representation objects to Modification 28 which relates to Policy SP8 (Employment)), and also the associated amendment which affects Designated Employment Area (DEA) 9 (High Road West). Our clients' interest relates to the former Cannon Rubber Factory site, which comprises the northern part of DEA9. This representation focuses on this part of the designation only.
- 5.2 If Modification 28 is accepted, the site will be retained within a 'Locally Significant Industrial Site' (LSIS), where *"The Council will safeguard the... [site]...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."* This policy would be unsound because the designation would not be justified, would not be effective and would be inconsistent with national planning policy.
- 5.3 The site is vacant and the former industrial use on the site has been in decline, evidenced by the winding down of the company and relocation off-site. No manufacturing or industrial activities have been undertaken on the site for a number of years and in 2012 only 5 office staff remained on site. The buildings were dated and not fit for purpose; furthermore, the site is isolated and located in an area of predominantly residential character. When assessed against the criteria outlined within the Mayor of London Industry and Transport SPG, the site is clearly suitable for release. The retention of the site within a LSIS is therefore not justified and the retention of the LSIS allocation would not be effective. In accordance with paragraph 22 of the NPPF, the long term protection of the site for industrial use should be removed to allow flexibility so that market signals and the relative need for different land uses to support sustainable local communities can be taken into account.
- 5.4 The Modification would be contrary to the Mayor of London's proposal to remove the LSIS designation as identified within the draft Upper Lea Valley Opportunity Area Planning Framework, which is scheduled for adoption later this month/next month. It would also result in a Plan that is not effective because it would potentially constrain the regeneration of the Northumberland Park area as envisaged by the Mayor in the OAPF, and also the Council in the emerging Local Plan. It would also be contrary to the recently published 'Plan for Tottenham' which identifies this site as the first site to bring forward the development of new housing, a

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school and other community uses, prior to a comprehensive masterplanning exercise being undertaken on the wider Northumberland Park area. The redevelopment of the site will therefore unlock the potential of the wider regeneration.

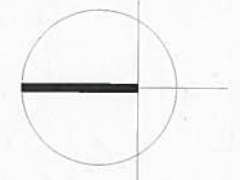
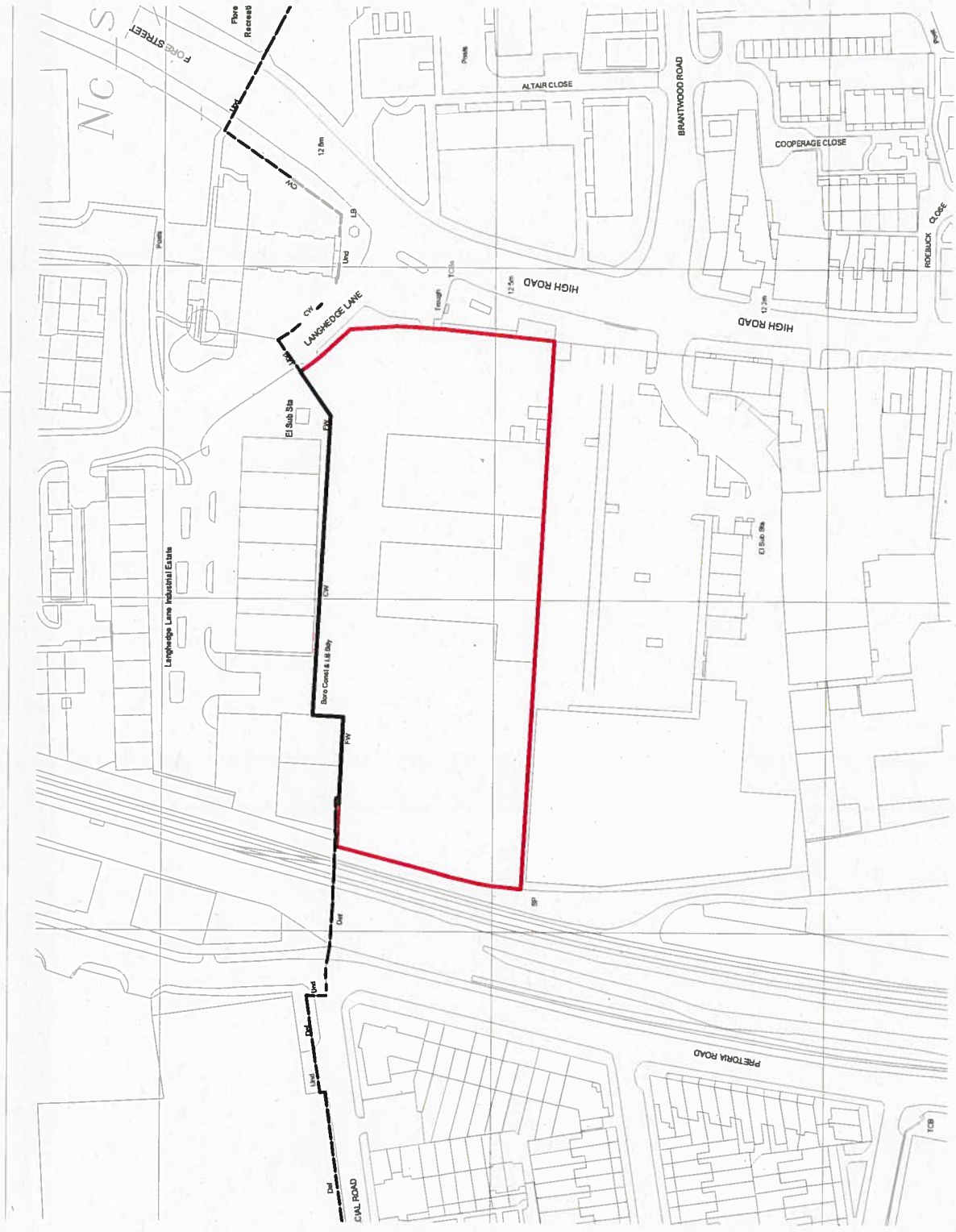
- 5.5 We therefore respectfully ask that the Inspector revokes this Modification and accepts that the site should be re-designated to provide flexibility in the release of the site to alternative sustainable uses that would better facilitate the regeneration of the area.

Appendix 1 – Site Plan

Appendix 2 – DEA9 Boundary

Appendix 3 – Extract from Draft Upper Lea Valley OAPF

Appendix 4 – A Plan for Tottenham



INFORMATION

File ref	11594-ARCH-MASTER
Drawn by	Date drawn
CC	10.08.12
Checked by	Date checked
DJB	29.08.12
Drawing number	Revision
003	-

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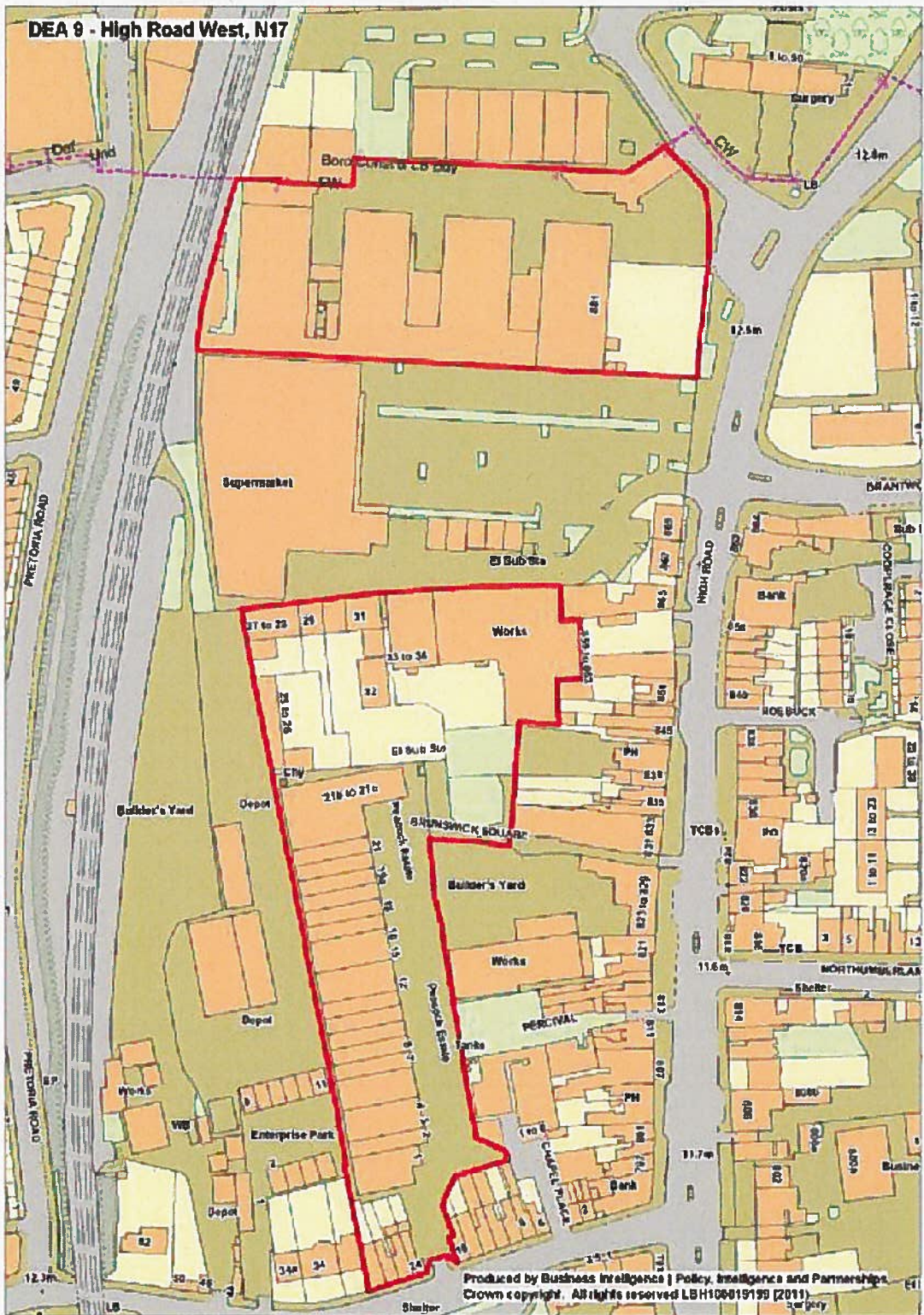
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Figured dimensions only are to be taken from this drawing. Do not scale the drawing. All dimensions are in millimeters unless otherwise stated. All dimensions shall be checked on site prior to works commencing. Any discrepancies shall be reported to KSS.

Revisions

Client	Newton Housing Trust
Project	Brook House
Drawing title	EXISTING SITE PLAN





UPPER LEE VALLEY

Opportunity Area Planning Framework

Consultation draft November 2011
GREATER LONDON AUTHORITY

MAYOR OF LONDON

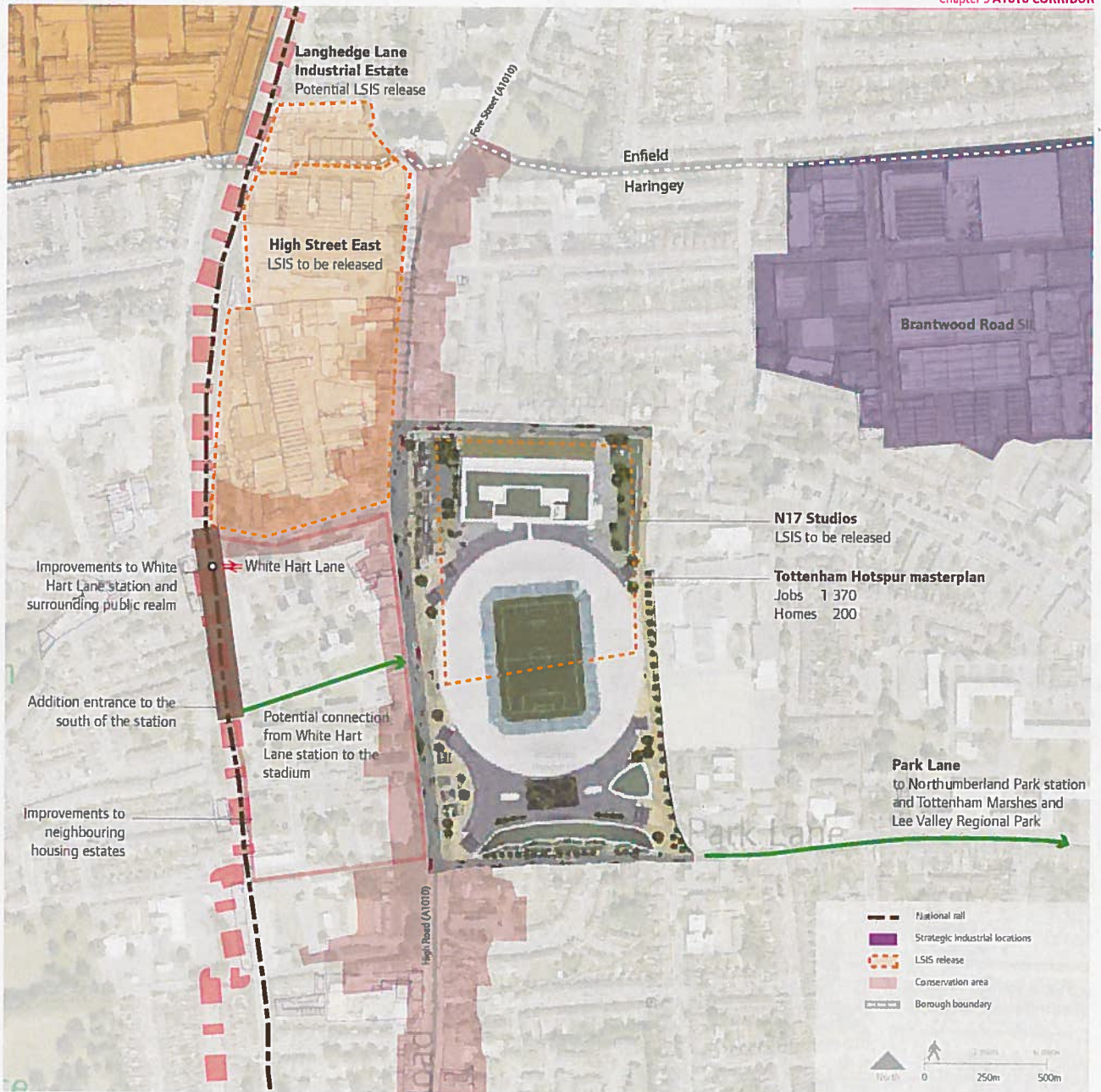


Fig. 9.5 Tottenham Hotspur masterplan

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