

Inspector's Note 2: I would like more information from the Council on the link between the Alterations to Strategic Policies and the Development Management policies relating to employment (DM38, 39, 40). An employment position paper setting this out would be helpful.

London Plan policies 2.17 and 4.4 require Boroughs to set a framework to plan, monitor and manage their stock of industrial/employment land having regard to delivering the spatial strategy. **Policy SP8 gives effect to these policies by establishing Haringey's employment land hierarchy along with the principles for managing the use of land within it.** SP8 sets the basis for safeguarding and proactively managing **Haringey's employment land** (to facilitate intensification and diversification of uses on sites) in order to meet the future forecast demand for 23,000 sq m new employment floorspace over the plan period¹, as well as to assist in achievement of the strategic jobs target² and other plan objectives. This approach is considered to be in line with the London Plan, which provides that there is "limited" scope for the release of employment land to other uses in the Borough³.

SP8 is clear that at the higher end of the hierarchy Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) will be safeguarded for a range of industrial uses, and at the lower end, a more flexible approach will be applied in Local Employment Areas (LEAs), of which there are two types - Employment Land (EL) and Regeneration Areas (RAs). EL is suitable for employment generating uses that complement traditional industrial activities, whereas RAs offer the potential for a wider mix of uses, including residential.

DM38 gives effect to the land use principles for LEA-RAs set out in SP8 (as well as non-designated employment sites in highly accessible locations). **Haringey's Employment Land Study** recognises that opportunities to grow B1 floorspace are needed within the Borough, and that RAs offer the most suitable and deliverable opportunities for this through the re-use of surplus B1c/B2 and B8 land/floorspace. DM38 therefore sets a positive framework to facilitate appropriate mixed-use development on RAs, consistent with SP8, to support delivery of plan objectives as set out above. The policy is informed by local evidence⁴ indicating that fully employment led schemes will not be viable on the majority of sites, however with cross-subsidy from higher value uses (principally residential) employment floorspace can be delivered.

DM39 provides a policy framework for selected LEA-RAs in parts of Haringay and Tottenham Hale. In these areas informal development has created a warehouse living community of self-employed artists, makers, musicians and entrepreneurs giving rise to

¹ Employment floorspace requirement set out in Alterations to SP2, as informed by Haringey Employment Land Study (2015)

² The London Plan (2015) forecasts 12,000 additional jobs in the Borough over the period 2011-2016. Over the period 2011-2036 it forecasts an additional 22,000 jobs in Haringey – this represents a 29.5% increase, the highest projected employment growth rate of all London Boroughs.

³ London Plan policy 4.4 and corresponding Map 4.1 set out the Borough level groupings for the **transfer of industrial land to other uses. Haringey is in the 'limited transfer' group.**

⁴ Workspace Viability Study (2015)

flourishing cultural and creative industries. Many areas now benefit from lawful development certificates, legitimising the residential use, but enforcement action still remains in place as much of the living accommodation is unsatisfactory in respect of building code compliance. Both the Council and the existing community wish to see this alternative form of living and working retained and provided opportunity to grow and not be replaced by more conventional forms of mixed use development. The policy therefore seeks to regularise/legitimise this existing alternative use through the setting of Warehouse Living Districts (defined by DM39.A) for areas where the use is already well established. The Council recognises that attempts to retain **'authentic' warehouse living** elsewhere in London have not always been successful, due mainly to the introduction of a residential land value and significant pressure for conventional housing as land and house prices rise in surrounding areas. Through DM39 the Council is seeking to ensure that future changes to these areas build upon the amenity being created, and crucially, enable provision of new employment floorspace needed to support businesses, **including the area's emerging** creative and cultural industries. For these reasons, the Council considers it essential, from a land use perspective, to retain the employment land designation and the primacy of employment use of these sites. While not a conventional mixed-use employment led development typology, the **'warehouse living'** product is consistent with an LEA-RA designation, in accordance with SP8. For plan implementation, DM39 is to be read in conjunction with relevant site allocations.

Given the **forecast requirements for employment land and floorspace and Haringey's** challenging jobs target, the Alterations to SP8 reflect the need to protect and manage both designated and non-designated employment sites. **DM40** helps to ensure a rigorous approach to the safeguarding of non-designated employment land and floorspace. The policy includes criteria to ensure sites are not protected where it can be demonstrated there is no reasonable prospect of them coming forward for employment uses. This approach is considered to be consistent with NPPF paragraph 22.