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Dear Sir

**HARINGEY LOCAL PLAN EXAMINATION: POST HEARING MODIFICATIONS CONSULTATION
CRUSADER INDUSTRIAL ESTATE, HERMITAGE ROAD, LONDON**

Thank you for providing us with the opportunity to respond to the London Borough of Haringey's Local Plan Post Hearing Modifications Consultation.

We write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited, who have an interest in the site at Crusader Industrial Estate, and have been working to develop initial proposals for its potential redevelopment.

As part of the ongoing Examination of the Haringey Local Plan, we understand that the Council is seeking comments on the proposed Post Hearing Main Modifications to the four Development Plan Documents which comprise the Local Plan submission. In this letter, we provide representations to the proposed modifications to the Alterations to Strategic Policies DPD, Development Management Policies DPD and the Site Allocations DPD.

Site

The site measures approximately 1.6 ha in size and currently comprises a series of one storey industrial units (Class B1, B2, B8 and Sui Generis) which together comprise the Crusader Industrial Estate. Access to the site is provided from Hermitage Road, and the site is well located in terms of the strategic highway network, including accessible from Seven Sisters Road. The site is located approximately 600m west of Haringay Town Centre and associated community facilities.

The site has a PTAL of 0-2 but it is located approximately 800m east of both Haringay Green Lanes Station and Haringay Station. The site is not located within a Conservation Area and does not contain any statutory or locally listed buildings. With regards to the Environment Agency's Flood Mapping, the site is located within Flood Zone 1 (i.e. it has the lowest probability of river or sea flooding).

The site is bound by residential dwellings to the east and west, existing employment uses to the north and the former Omega Works site to the south. Planning permission for the redevelopment of the former Omega Works site to provide residential use was granted in December 2016. The land use surrounding the site is therefore considered to be predominantly residential.

Emerging Allocation

The site is currently allocated as a Locally Significant Industrial Site (LSIS) within the adopted Local Plan Strategic Policies DPD (2013), forming part of the wider Crusader Industrial Estate 'N15' allocation.

However, within the Pre-Submission Version of the Alterations to Strategic Policies DPD (January 2016) it was proposed that the site be removed from the list of Locally Significant Industrial Sites and re-designated as a Regeneration Area. Proposed Policy SP8 identifies that a Regeneration Area is the most flexible category as it can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses.

The Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) includes proposed development trajectories. The Crusader Industrial Estate is identified as Site SA31 and is cited as having capacity for 64 residential units as well as 2,218 sq m employment floorspace.

Comments on Proposed Alterations

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and that Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic.

Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area. Paragraph 173 requires careful consideration of viability and costs. Plans should be deliverable and the scale of development identified in the plan should not be subject to such obligations and policy burdens that their ability to be developed viably is threatened.

We support the re-designation of the site from a LSIS to a Regeneration Area, in order to allow a more flexible range of uses on the site as identified under Draft Policy SP8 of the Pre-Submission Version of the Alterations to Strategic Policies Local Plan DPD (January 2016).

This is a brownfield site within close proximity to Harringay Town Centre and Harringay Green Lanes Station, and best use should be made of it in line with key national policy directions. The site is bound by residential dwellings along both its eastern and western boundaries. We also note that prior approval for the change of use of the former Omega Works site, located to the south of Crusader Industrial Estate along Hermitage Road, from storage (Class B8) to residential (Class C3) was granted in December 2016 (Ref. HGY/2016/3604). This further changes the character of the surrounding area, comprising predominantly residential use.

Housing Delivery

With regards to the Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) we support the proposed housing trajectory tables set out in Appendix 2 which identifies the Crusader Industrial Estate site as a ‘deliverable housing site’, expected to come forward within the first five years of the Plan (2016/17 – 2020/21). We consider this timescale for delivery to be wholly realistic and in the spirit of being positively prepared, as sought by the NPPF. However, we consider the proposed capacity of the site for only 64 residential dwellings to comprise a missed opportunity to optimise its development potential and to “*boost significantly the supply of housing*” as sought by national planning policy.

The allocation of the site should promote flexibility and should seek to optimise its development potential. A design-led approach should be encouraged, which should then inform the overall density of housing schemes coming forward. Initial feasibility assessments indicate that up to 275 dwellings could be delivered at the site, and the proposed housing trajectory for the site should be amended to reflect this. The policy as drafted is therefore inconsistent with national policy and in order to be effective, should be amended to encourage a higher density of residential accommodation to come forward at the site.

The Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) sets out an annual target for 1,502 dwellings per annum from 2015-2026. Whilst this accords with the annual average housing supply monitoring target set out in Table 3.1 of the London Plan, we consider that an increased target is required in order to meet the needs of the borough and London as a whole.

There is a consensus that London's adopted housing target of 42,000 new homes a year is too low. The London SHMA, published in 2013, states that London needs between 49,000 and 62,000 new homes a year to address the backlog of housing shortfall over a period of 10 or 20 years. Other assessments estimate an even higher need: employment-driven forecasts made pre-referendum by Oxford Economics indicate an annual housing need of 64,000 a year over the next five years with no allowance for meeting the backlog; and to clear the backlog since 2011 in five years, the TCPA puts London's housing need at 87,000 a year. We therefore estimate that London should be delivering more than 60,000 new homes a year if we are to meet need and address imbalances in the housing market that have resulted from the ongoing undersupply of homes. We strongly feel that London Borough of Haringey has a responsibility to assist in overcoming the chronic housing shortage facing London as a whole.

It is therefore considered that there is significant scope for the annual target to be pushed in the spirit of significantly boosting housing supply and feel that more innovative solutions could be used to assist in meeting specific needs. The emerging policy documents acknowledge that the Crusader Industrial Estate site is appropriate for alternative uses (including residential) and could become available for redevelopment within the next five years. Both the Council's overall housing target and the Crusader Industrial Estate's capacity should therefore be corrected upwards in line with the above.

Employment Floorspace

The Schedule of Modifications to the Alterations to Strategic Policies DPD (November 2016) also includes employment trajectory tables. The Crusader Industrial Estate is identified as having an estimated capacity of 2,218 sq m, although the Schedule of Modifications includes wording to state these figures are indicative and are based on gross floorspace. The actual amount of employment floorspace to be delivered will depend on the floorspace to be retained and reconfigured, the achievement of the maximum employment floorspace on existing employment sites having regard to the proposed overall mix, site layout and constraints, and viability.

We note that modifications are also proposed to Draft Policy SP8, including the forecast demand for employment floorspace which is considered to be 23,800 sq m of Class B floorspace up to 2026. This forecast demand is to be met through:

- the reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes;
- the intensification of the use of existing employment sites (where possible);
- the provision of B1a/b floorspace as part of mixed-use development on suitable sites, including town centre sites; and
- the protection of existing viable B Class Uses on designated and non-designated sites.

Whilst it is appreciated that there is a requirement to explore the feasibility and viability of re-providing some employment generating uses as part of any redevelopment proposals for the site, the Mayor acknowledges in his draft 'A City for all Londoners' document that whilst there is a need to promote economic growth, the economy is changing and land must be used intelligently, particularly in the context of a housing crisis.

The Mayor advises that in some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land. The Crusader Industrial Estate should be acknowledged within emerging policy as having the potential to provide a range of other compatible uses alongside residential. Class A and Class D uses also have the potential to provide employment opportunities so should be encouraged where appropriate.

The Schedule of Modifications to the Development Management Policies DPD (November 2016) seeks to amend Part A of Draft Policy DM38 to state “The Council will support proposals for mixed-use, *employment-led* development within a Regeneration Area”. The proposed modifications also seeks to ensure applicants will be required to submit a viability assessment that clearly demonstrates that the proposed mixed-use scheme maximises the development of employment uses.

To ensure maximum flexibility for the development of this key site and in order to provide much-needed housing, we do not support the emphasis on employment-led redevelopment for the site. The amount of employment floorspace to be provided as part of redevelopment proposals will be different on each of the allocated sites and will be based on appropriate viability and marketing evidence. Allowance for this and greater flexibility in terms of a mix of uses should therefore be incorporated into the policy. This would not inhibit the ability of the site to re-provide employment generating uses where there is market demand, but would optimise its potential for being brought forward for housing, which is considered to be of key importance given the Council's considerable requirement for new housing.

The Schedule of Modifications to the Development Management Policies DPD (November 2016) also seeks to amend Paragraph 6.17 in relation to Local Employment Area – Regeneration Area in order to state that “where non-employment uses are introduced, it is imperative that the employment and business function of the Regeneration Area is retained”. This is considered detrimental to the future regeneration of the site and not compliant with Paragraph 22 of the NPPF which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose. The policy should include provision for the net loss of employment floorspace to be considered acceptable on sites also designated for housing.

Future Participation

We trust that the above is of assistance in the preparation of the Haringey Local Plan. We would like to be kept up to date with progress and look forward to further opportunities to engage and look forward to confirmation of receipt of these representations. Please feel free to contact me or my colleague, Lucy Aspden (0207 299 3094), of these offices if you have any queries or would like to discuss.

Yours sincerely

Diana Thomson
Associate Director

cc. Kathryn Ware, CBRE
Stephen Murden, L&G