

Planning Policy Team
London Borough of Haringey
River Park House (6th Floor)
Wood Green
London
N22 8HQ

By post and email

2nd November 2011

Dear Planning Policy Team

**Representations by Newlon Housing Trust
London Borough of Haringey Local Development Framework
Core Strategy Additional Regulation 27 Consultation on
Affordable Housing and Employment Land Designations**

Newlon Housing Trust ("NHT") wishes to respond to the Council's additional Regulation 27 consultation on fundamental changes to employment land designations under Policy SP8; specifically to the proposed re-classification of a number of Defined Employment Areas (DEAs) contained within the consultation document.

NHT as an organisation has been involved in providing affordable housing across several key development sites in Greater London. NHT has been particularly active in Haringey, for example through the Tottenham Hale development, which is identified as one of the Borough's key regeneration sites. Furthermore, NHT has successfully completed the refurbishment of Tottenham Town Hall as a local business and community hub, and is now constructing new housing on the back land site. Finally, we have moved our new headquarters to Tottenham Hale.

As a significant land owner and investor to the area, NHT is acutely aware of the housing challenges that exist in the eastern part of the Borough and particularly within Northumberland Park ward. However, our experience at Tottenham Hale has demonstrated that successful, large-scale renewal in Haringey is achievable. NHT therefore welcomes the support presently afforded by the Core Strategy for Tottenham Hotspur's redevelopment proposals as a catalyst for the regeneration of the wider area. NHT wishes to ensure that the Council adopts a flexible and forward-looking policy basis that will enable the benefits of the redevelopment of White Hart Lane to be captured by associated development in the area.

To this end, NHT wishes to see more flexibility in several of the DEA designations so that the regeneration of neighbourhoods can be planned more comprehensively and where appropriate land uses rationalised in order to create more sustainable communities.

It is against this background that NHT wishes to comment on Policy SP8.

Policy SP8 – Comments

The changes to Policy SP8 mainly concern the change in classification of some of the DEAs contained within the Submission Draft of the Core Strategy. Within the document there are 3 broad categories outlined:

- **Industrial Land:** is land that will be safeguarded 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.

Winner of the Gold Award for Housing Excellence

Newlon Housing Trust is part of the Newlon Group and is a charitable housing association

Registered Office: Newlon House, 4 Daneland Walk, Hale Village, London N17 9FE

Residents' contact line: 020 7613 8080 - All other enquiries: 020 7613 8000 - www.newlon.org.uk

Group Chief Executive: Mike Hinch Chair: George Taylor

Registered with the Tenant Services Authority L0006 HM Revenue & Customs Charity No.X21906/1 Industrial and Provident Society 18449R



Awarded for excellence



INVESTORS IN PEOPLE

- **Employment Land:** is land that is deemed acceptable for other employment generating uses that complement the traditional 'B' use classes, such as a small scale 'walk-to' retail, cafes and crèche/nursery.
- **Regeneration Areas:** are the most flexible of the categories as they can include uses appropriate in a mixed use development, such as small scale 'walk-to' retail, community and residential uses.

Proposed DEA9 Designation (High Road West)

NHT notes that the site was designated as Industrial Land at submission stage, but is now proposed as Employment Land with the intention that complementary uses are allowed in addition to traditional uses.

The proximity of the DEA9 designation to White Hart Lane redevelopment proposals and its inclusion within the wider Area of Change identified by the Council suggest that the Council should be as flexible as possible in the land uses it will allow in order to harness the potential benefits of the Spurs redevelopment. It is particularly important that the Council makes more land available for housing, not only to meet existing housing needs, but to effect the structural rebalancing of housing tenures across Haringey, which will begin to address the longstanding deprivation. Subject clearly to the appropriate relocation of businesses, sites such as Canon Rubber and the Peacock Industrial Estate, which are presently covered by the DEA9 designation, could provide an ideal source of new housing. This approach would be consistent with the Government's current growth agenda as expressed firstly in the Written Ministerial Statement of 23 March *Planning for Growth* and the draft National Planning Policy Framework.

NHT therefore requests that the proposed Employment Land designation be amended to a **Regeneration Area** designation, the effect of which would be to provide crucial development plan support for the regeneration of the area ahead of the formulation of a more detailed Area Action Plan.

DEA17 (White Hart Lane)

The site was designated as Industrial Land but is now proposed as Employment Land with the intention that complementary uses are allowed in addition to traditional uses.

For the reasons stated in relation to DEA9 above, NHT does not believe that the proposed re-designation from Industrial Land to Employment Land of this site will provide the flexibility required to capture the potential benefits from the redevelopment of White Hart Lane and support the regeneration of area.

NHT requests that the proposed Employment Land designation for DEA17 be amended to a **Regeneration Area** designation, the effect of which would be to provide crucial development plan support for the regeneration area ahead of the formulation of a more detailed Area Action Plan.

Please do not hesitate to contact Mike Hinch or Sarah Timewell in this office if you require any further information or clarification.

Yours Sincerely



**Mike Hinch
Group Chief Executive
For Newlon Housing Trust**

Winner of the Gold Award for Housing Excellence

Newlon Housing Trust is part of the Newlon Group and is a charitable housing association

Registered Office: Newlon House, 4 Daneland Walk, Hale Village, London N17 9FE

Residents' contact line: 020 7613 8080 - All other enquiries: 020 7613 8000 - www.newlon.org.uk

Group Chief Executive: Mike Hinch Chair: George Taylor

Registered with the Tenant Services Authority L0006 HM Revenue & Customs Charity No.X21906/1 Industrial and Provident Society 18449R



Awarded for excellence



INVESTORS IN PEOPLE