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Planning Policy Team
Haringey Borough Council

Our Ref: PINS/Y5420/429/4
Date: 24th August 2012

Dear Ms Whelehan,

Haringey Local Plan: Strategic Policies

With regard to the ongoing examination into the submitted Local Plan and my letter of 22nd August, I thought it may be helpful and informative for the intended public consultation to summarise the reasoning for Modification 28.

Local Plan Policy SP8 refers specifically to employment matters and establishes a hierarchy of employment land within Haringey in a manner that accords with the London Plan. The submitted approach is justified by, amongst other sources, the Council's Employment Study of 2004 which was updated in 2008 and latterly in 2012.

In relation to the employment land hierarchy, the submitted Local Plan identifies its Strategic Industrial Locations which are in line with the London Plan. This principle is warranted and sound.

The Council's publication Local Plan (May 2010), informed by the Employment Study, carried forward the Defined Employment Areas (DEAs) of the Unitary Development Plan. This appears both logical and justified. Subsequently however, the Council chose to alter some of the specific designations of its DEAs, including Locally Significant Industrial Sites, through the publication of its Schedule of Focussed Changes prior to submitting the Local Plan for examination. During the course of the Examination, the analytical basis for these changes has been less than clear.

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



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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.

With due regard to the evidence and the justification provided in relation to employment land, I therefore recommend the necessary main modification to discount the Schedule of Focussed Changes as they relate to alterations of the Borough's DEAs at the level of Locally Significant Industrial Sites and below in the employment hierarchy (MM28).

I trust that this is of assistance and could be included within the consultation papers to help a broader understanding of the issue.

Yours sincerely

Andrew Seaman

Senior Housing and Planning Inspector