

Hearing Statement – Site Allocations DPD

Representor: John Ferguson

Representor Reference: 16

In respect of:

Matter 2.4

Matter 2.6

Matter 2.8

Matter 3 – SA30

The evidence enclosed sets out that the plan is not sound as it is not consistent with National, Local and Regional Policy, is not justified, effective or positively prepared and is not clearly worded.

On behalf of

Provewell Estates

RPS CgMs Ref: 17700

29th July 2016

QUALITY MANAGEMENT

Representor Reference:	16
Representor:	John Ferguson
Date:	29th July 2016
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Hearing Statement –Site Allocations DPD

Introduction

This statement has been prepared on behalf of my client Provewell Estates in response to Inspector's Draft Matters and issues for Examination of the Site Allocations DPD for London Borough of Haringey.

This response reiterates and references the representations made in March 2016 in relation to the proposed alterations to Haringey's Site Allocations Development Plan Document, expanding on the issues and matters raised by the inspector.

Matter 2.4 - Is the amount of deliverable land allocated for housing sufficient to meet the needs of the borough over the 2016-2020 and the years 2021 – 2026? If not, how will the plan ensure that an appropriate housing land supply will be maintained?

Haringey's Strategic Policy SP1 (as revised) commits to deliver at least 19,802 net additional homes in the borough in the 15 year period between 2011/12 – 2025/26. Haringey's Annual Monitoring Report details 3,985 completions so far in the Plan period, thus reducing the housing target over the remaining 11 years. The Tottenham Area Action Plan sets out to deliver 10,624 new homes, and the SA estimates the delivery of 7,698 net residential units over the plan period. The allocated housing capacity therefore meets the needs of the borough up to 2026. This housing target equates to 1,438 units per annum, which is less than the target set out in table 3.1 of the London Plan (FALP), which sets a housing supply target of 15,019 between 2015-25 with an annual monitoring target of 1,502 units per annum.

Matter 2.6 – Taking into account the aims of the Strategic Policies, how does the potential for loss of employment land in some of the allocations, allow for the supply of employment land. Has sufficient land been identified to meet needs in the short term?

The re-designation of SA34 to LEA-RA would not result in the loss of employment land, the existing employment floorspace would be re-provided as part of the redevelopment of the site; and would meet the aims of the Strategic Policies in terms of meeting both employment and housing need.

Matter 2.8 – Are the locations identified the most appropriate when considered against all reasonable alternatives?

LB Haringey have designated the sites SA30 (Arena Design Centre) and SA34 (Eade and Overbury Roads) as Local Employment Area – Regeneration Areas, described in SP8 as the most flexible of the employment categories. This employment designation is supported for SA34, which flexibly reflects the Warehouse Living characteristics at the site and is the most appropriate location for such designation.

However, SA30 is not a suitable location for LEA-RA, as detailed under Matter 3 below.

Matter 3 – Haringey Warehouse District SA30

Unclear as to what this designation is seeking as set out in the description of the proposed site allocation?

Appendix D – Glossary of Terms of the SA DPD defines Warehouse Living as “purpose built and genuine integrated working and living accommodation specifically targeted at the creative industries sector”.

The Council have designated SA30 – Arena Design Centre as a Local Employment Area – Regeneration Area; the proposed site allocation description states “Potential development to increase accessibility providing increased employment floorspace and provide warehouse living accommodation”.

This description does not serve the overall purpose of the site designation, or indeed reflect the existing nature of the site which has 275 residents living in lawful residential units and only 5 people employed across two commercial units.

The omission of including that residential accommodation can be provided in the site designation description could lead to a misinterpretation of the site allocation, and prevent viable development opportunities coming forward. Redevelopment in accordance with this description would not be in compliance with London Plan Policy 3.14 ‘Existing Housing’, which states that “loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.”

What is the justification for it being a Designated Local Employment Area – Regeneration Area?

SA30 ‘Arena Design Centre’ is designated as a Local Employment Area – Regeneration Area, despite no previous employment allocations on the site and not justified by the evidence base. SP8 defines Local Employment Areas as “local employment generating sites in the borough that need protection.” This site however only employs 5 people across 2 units and therefore does not meet this description.

The Sustainability Appraisal used to inform the Site Allocations DPD concludes that Arena Design Centre as a site that is ‘potentially suitable for housing, and not suitable for employment’, yet was subsequently designated for employment.

The SA also states in paragraph 14.8.5 that PTAL is a key factor that has influenced the approach taken to particular sites. The paragraph sets out that an increase in jobs is only sought on accessible sites with a PTAL rating 3 or above; the SA then notes that the PTAL rating for Arena Design Centre is low. There is no justification as to why this site is allocated as a local employment area despite being inaccessible, according to the SA methodology.

Furthermore, Haringey’s Employment Land Study 2015 does not include an in-depth analysis for Arena Design Centre in relation to the site designation.

The designation of this site as LEA-RA is clearly not in compliance with paragraph 22 of the NPPF, which directs “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.”

Evidently, there is no sound justification for the designation of this site as a Local Employment Area – Regeneration Area. This site should therefore be removed from this unsuitable allocation and amended to a purely residential allocation.

Would residential use be acceptable here and, if so, why is this not included in the description?

In assessing suitable site uses, the Sustainability Appraisal for the Site Allocations DPD states in paragraph 10.2.5 that “a site is suitable for residential development unless it is a Designated Employment Area”. SA30 was not previously designated for employment and accordingly, would be suitable for residential development, in line with this assessment.

Only 10% of the site floorspace remains in employment use, whereas there are 275 residents across 81 lawful residential units; residential redevelopment would be wholly suitable in this established largely residential area. Indeed redevelopment that would result in the loss of existing housing would be contrary to local and national planning policy, as Policy DM10 states: “The Council will resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace.”

The description of this site allocation should therefore be amended to explicitly permit residential accommodation at the site.

Where is the assessment of whether there is a reasonable prospect of employment uses here, given the nature of the existing uses?

As established above, the character of the site is more akin to residential than commercial, and there is no justification for the employment land designation. This designation conflicts with the NPPF, which directs in paragraph 22 that “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.”

The designation of this site for employment purposes goes against London Plan policy 4.2(b) ‘offices’, which states that boroughs should focus “new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses”. This site has a PTAL rating 3 and according to the evidence base for this document, is therefore not suitable for employment purposes.

An assessment of lettability was conducted by Currell Commercial Surveyors in 2015 to assess the prospect of the site being used for employment purposes; this was appended to the Representations submitted to the Council in March 2016. The assessment concluded that the site would have limited appeal to modern day occupiers due to the poor access and the nature and type of the buildings. The letter also stated that occupiers would be deterred by the presence of the mainly residential/warehousing living use of the site.

The Council have failed to demonstrate any evidence to support that there is any reasonable likelihood that this site would successfully be used for employment uses. The rise in people living at the site over the recent years is in part due to the site being unsuitable for employment purposes and unattractive to traditional commercial businesses. The use of site has adapted organically to meet the needs of the area and in response to flexible working practices. The designation of this site as an employment area would undoubtedly prevent redevelopment coming forward on this site, particularly given the uncertain ‘BREXIT’ climate.

This allocation is unsupported by national or regional policy and is based on an unsound, unjustified evidence base that pays no respect to the existing characteristics of the site. SA30 should therefore be removed from the LEA – RA designation, and allocated for residential use.

