
Examination in Public LB Haringey Development Management DPD Issues for Specific Policies

Prepared by Barton Willmore LLP on behalf of Workspace

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CONTENTS

1.0 OVERVIEW1

2.0 ISSUES FOR SPECIFIC POLICIES2

1.0 OVERVIEW

1.1 This Written Statement has been prepared on behalf of Workspace (Representor Reference 17) in respect of the Issues for Specific Policies identified in the Inspector's Draft Matters and Issues for Examination of the London Borough of Haringey's Development Management DPD.

1.2 This Statement has been prepared with due regard to the tests of 'soundness', as set out in Paragraph 182 of the National Planning Policy Framework ('NPPF'), namely:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

1.3 In accordance with the Inspector's Guidance Notes, this Statement responds only to the matters raised by the Inspector in the Draft Matters and Issues for Examination. This Statement respects the 3,000 word limit, and limits repetition from previous representations to points salient to responding to/ providing context for the matters raised.

2.0 ISSUES FOR SPECIFIC POLICIES

2.1 With respect to the specific policies, we seek to respond to the following:

- DM6 – Building Heights (Parts B and C);
- DM11 – Housing Mix (Part C);
- DM22 – Decentralised Energy (Part C);
- DM38 – Employment-Led Regeneration.

4. **DM6 – Part B. The term 'community benefit' is not clear, nor is it explained in the text. What is it? Does the Council intend that for every 'taller' building, a 'community benefit' (whatever that may be) is derived, if so, where is the justification for this?**

2.2 We do not consider that there is justification to require a community benefit to be demonstrated for taller buildings. As drafted, policy DM6 B. assumes that every taller building is, by definition, harmful and must demonstrate community benefit to be considered acceptable. If a taller building is acceptable in urban design terms then no further benefit should be required. The Council has not published evidence to support the case as to why taller buildings are considered harmful and why community benefits would therefore be required. This element of the policy is not justified or reasonable and should be omitted.

6. **DM11 – Is Part C necessary? What is this based upon? What is meant by overconcentration – how would this be determined? Would part A.a. be sufficient to cover this point in any event?**

2.3 We do not consider that Part C is necessary. It is accepted that developments should provide an appropriate mix of dwellings sizes. However, the test should be as set out at Part A.a. and relate to, inter alia, site circumstances, location and the character of the area. Not all sites and not all locations will be suitable or desirable for family units. Specifically, sites such as the Chocolate Factory which are identified in the Site Allocations DPD as a site for employment-led redevelopment (SA19), may not be suitable for family units given the level of employment that will remain on site and the general market conditions in the area. This element of the policy is not sufficiently flexible to account for all sites and all locations and would not allow development proposals sufficient flexibility to respond to market demand. We consider that Part C should be omitted from the policy.

15. DM22 – Part C. The policy is too prescriptive and onerous. Is this always the best option for major development to meet the aims of the policy? What about viability and feasibility? Is criterion d supposed to deal with this point? If so, it would need rewording to make it clear that b and c are subject to viability and feasibility. Part E, this should be moved to the supporting text as it is not a planning policy.

2.4 As drafted, this policy is not reasonable or justified. It is accepted that connection to an existing decentralised energy network should be explored as an option. However, this may not always be the best option and the policy should make clear that alternatives will also be considered. To require connection to a planned network (C.c.) could unacceptably impact on the delivery of development if a scheme is designed to connect and there are delays to the delivery of the network. This would be outside of the developer's control and could result in significant cost implications to revert to an alternative energy supply. This policy is overly prescriptive and should be amended to allow the consideration of alternatives, with a more realistic approach to connection to planned networks.

17. DM38. Is the policy too prescriptive and not flexible enough to take into account all site circumstances? Would the requirements prevent suitable development from coming forward? What is the justification for criterion d? How would this relate to other National and Strategic Policies relating to gypsy and traveller accommodation, including the need for land? Would criterion e. be covered by other parts of the Plan?

2.5 This policy seeks increases in employment floorspace as well as employment density (i.e. jobs) and the quality of the space provided. This is onerous and requiring increases/ improvements in all areas places a significant financial burden on development proposals. It would be more appropriate and reasonable for the Council to aspire to an increase in employment floorspace or jobs alongside qualitative improvements. The measure of employment increase should be consistently presented in the Development Management DPD and Site Allocations DPD as it is currently unclear as to the required measure and requiring both would be overly onerous.

- 2.6 The requirement for 'affordable workspace' is not expanded upon in the supporting text to the policy. It is therefore unclear as to what the policy requires and the mechanics of how this would be applied. For example, what is the planning justification for requiring 'affordable workspace'? What proportion would be sought and how would this be determined? How would the level of rent be determined and who would determine this? If the affordable workspace becomes unviable, what provisions would be included to remedy this (i.e. a time limit on how long the space must be provided as affordable)? If a requirement for affordable workspace can be justified on the basis of the economic and social impact on the local area, how would the policy operate to ensure that only those businesses essential to the local area would benefit?
- 2.7 The Council's evidence base document: Workspace Viability Assessment (2014) identifies significant issues in LB Haringey with employment and residential values. If no increase in values is seen in Cluster 2 (within which Workspace's land holdings are located), the Assessment advises that significant amounts of residential floorspace would be required to cross subsidise the provision of employment floorspace (see Table 15; page 76). The provision of employment floorspace at open market values is therefore already a cost to the scheme. Furthermore, it is a depreciating asset requiring on-going maintenance and investment to maintain rental levels. This is particularly key for sites, such as the Chocolate Factory, where older buildings are sought for retention through the site allocation (SA19) and which will require notable maintenance. The provision of 'an element' of affordable workspace would place further financial burden on redevelopment proposals which would need to be considered in the context of development viability so as not to impact on delivery. It would also need to be balanced against other viability considerations such as affordable housing.