



29 July 2016

Jackie Lawrence  
Programme Officer  
Haringey Council  
Level 6, River Park House  
225 High Road  
Wood Green  
N22 8HQ

**BY EMAIL**

Dear Jackie,

**MATTERS AND ISSUES FOR THE DEVELOPMENT MANAGEMENT DPD  
ON BEHALF OF DIAMOND BUILD PLC  
REPRESENTOR REFERENCE ID: RTAAP162**

On behalf of our client, Diamond Build Plc, we write with regards to the Haringey Local Plan – Inspector’s Draft Matters & Issues for Examination issued on the 19<sup>th</sup> July 2016. This letter should be read as formal comments in relation to Questions 16 and 17, posed by the Inspector in relation to Chapter 6 ‘Employment and Town Centres’ of the Development Management DPD, as set out below:

*16. DM38. This policy appears to be more onerous than strategic policy SP8? SP8 says mixed use is acceptable, but policy DM38 says only if it is necessary. Why is there a different conclusion reached for these policies? Where is the evidence following on from the SP that a more onerous approach needs to be taken? What are the implications for LEA –RA in site allocations or AAPs identified for mixed use?*

*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?*

Our client wishes to highlight there is a clear need to ensure that there is continuity between policies contained within each Haringey Local Plan document in order to ensure that the strategic vision, as set out in the Alternations to the Strategic Policies DPD, is met. Policy SP8 encourages

a flexible approach to uses within Local Employment Areas. Whilst the justification text that accompanies Policy DM38 seeks to support mixed-use development within a defined “Local Employment Area – Regeneration Areas”. The policy wording identifies additional policy requirements that a scheme must include in order to be considered acceptable. As the evidence base to reinforce the need to take this approach has not been provided it is considered that this approach is not justified and the policy wording should be amended to reflect a more flexible approach.

In particular, it is not considered that Part D, which requires the need to investigate the site’s potential to meeting the Boroughs identified gypsy and traveller accommodation needs, is justified. The main aim of this policy is to maximise the amount of employment accommodation deliverable on a site, through the introduction of a higher value uses such as market residential. The introduction of the need to investigate accommodating gypsy and traveller accommodation would have a similar, if not bigger, impact as having to include affordable housing into a mixed use scheme i.e. the level of deliverable employment floorspace would be significantly reduced.

In order for this approach to be considered effective, there is a need to define in the wording of the policy that the provision of affordable housing would not be required, as the introduction of residential units is only considered acceptable where it seeks to facilitate the maximum provision of employment floorspace including where possible capped rents. We propose the following amendment to Policy DM38(d):

~~d Investigate the site’s potential to contribute to meeting the Borough’s identified gypsy and traveller accommodation needs;~~ In order to maximise the amount of employment floorspace to be provided in the mixed use scheme, affordable housing provision will not be required;

I would be grateful if you could confirm receipt of this letter in the first instance and should you require any further information, please do not hesitate to contact me on the details provided in this letter.

Yours sincerely,



**Alison Mackay BA (Hons) MSc MRTPI  
SENIOR PLANNER**