

London Borough of Hackney

Ref: ID 49

Representations Reference: ID RDM157

Policy Document: **HARINGEY DEVELOPMENT MANAGEMENT DPD**

Relevant Policy

**DM39 – CHAPTER 6 EMPLOYMENT AND TOWN CENTRES**

1. This statement sets out Hackney Council's concerns regarding the appropriateness of policy DM39 – Warehouse Living.
2. Haringey has made provision for proposals for warehouse living within the Haringey Warehouse District as defined in the Site Allocations Local Plan with DM39 of the DM DPD setting out policy criteria for which schemes in these areas will be assessed against.
3. The policy seems to promote the flexible live/ work arrangements. This type of arrangement is not currently supported under Hackney's existing Development Plan due the historical loss of employment floorspace in the borough through residential conversions. Whilst DM39 considers controls on management of warehouse living space, given there is no requirements for a separation of use (B and C3 use class). This could result in a loss of B use floorspace to residential over time. The introduction of this policy could also potentially create a number of land use and enforcement problems over time if not monitored rigorously.
4. As currently drafted it is not clear if DM39 is seeking to ensure that overall amount of existing employment floorspace within these defined Site Allocations is re-provided within any new development (i.e. no net loss). Hackney is concerned that policy DM39 is not supported by evidence (please refer to the Council's submission to the Alterations to the Strategic Policies ID24, RSP63 appended to this statement).
5. A masterplan is necessary for each site allocation to avoid piecemeal and disjointed applications emerging across the site. As set out in our response ref ID 229 to the Site Allocations DPD, the Council wishes to work with Haringey on the masterplanning for these key sites which adjoin the borough boundary and have the potential to contribute to meeting local needs.

## Appendix 1 Alterations to the Strategic Policies ID24, RSP63

London Borough of Hackney

Ref: ID 24

Representations Reference: RSP63

Policy Document: HARINGEY ALTERATIONS TO STRATEGIC POLICIES

Relevant Policy

Matter 3 – CHAPTER 6 EMPLOYMENT AND TOWN CENTRES

Inspector Question 18

1. Hackney Council is committed to working with Haringey on strategic issues and as such an officer meeting was held on 6 April 2016. This statement sets out details of the outstanding concerns regarding employment policies.

2. Haringey's Employment Land Study February 2015 Final Report (Submission #61), by Atkins, indicates that to 2031 there is a need for between 48,800 – 102,600 sqm B1a/b space, and that Haringey should plan for a minimum of 8 Hectares of B1a/b land to meet this need. It also however cautions that these would be challenging to provide in light of the "council's housing and regeneration priorities", and so recommends that that Haringey re-uses surplus industrial sites, intensifies existing employment sites, promotes mixed use developments and safeguards good quality employment sites.

3. The Employment Study (Submission #61) has a specific section reviewing the role of live/work uses, which contains the following conclusion:

"[8.27] Based on the above [evidence from studies conducted in other boroughs] it is considered unlikely that live/work units can play a major role in Haringey in terms of promoting regeneration and housing growth while also providing employment floorspace."

4. The ELS (Submission #61) also indicates a decline in, but continued need for B2 and B8 uses in the borough so support businesses and it states that developments involving losses of employment land should look to relocate remaining businesses to suitable premises to that viable industrial and warehouse businesses are not affected.

5. Hackney is concerned that the approach to warehouse living detailed in policy DM39 (Submission #4) is not supported by evidence and will not deliver the employment growth set out in the London Plan and detailed in paragraph 5.1.18 of the alterations document (Submission #4). There is emerging evidence to suggest that businesses relocate from Hackney to larger/move on premises in the Upper Lea Valley and adjoining boroughs. It is therefore important for the wider economy to ensure that sufficient land and premises are available.