

KES/DP3670

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Dear Sir / Madam,

**HARINGEY LOCAL PLAN PRE-SUBMISSION CONSULTATION AND  
HARINGEY LOCAL PLAN, DEVELOPMENT MANAGEMENT POLICIES DPD**

**REPRESENTATIONS ON BEHALF OF KA INVESTMENTS AND DEVELOPMENTS  
LIMITED**

These representations are submitted to Haringey Council (the “Council”) on behalf of our client, KA Investments and Developments Company Limited (“KA Investments”) in response to the following documents that form part of the Haringey Local Plan:

- Alterations to Strategic Policies, January 2016; and
- Development Management Policies, January 2016.

KA Investments welcomes the opportunity to comment on emerging policies given its ongoing commitment to deliver a scheme at 109 Fortis Green and interest in continuing to work on further sites elsewhere within the borough.

Affordable Housing

KA Investments supports the increased targets for new homes in Haringey set out in amended Strategic Policy SP2. KA Investment’s notes that amended Policy SP2 seeks to reduce the level of affordable housing sought in schemes of 10 or more units, from 50% to 40% and alters the desired tenure split from 70% affordable rent / 30% intermediate rent to 60% affordable rent / 40% intermediate rent. KA Investments supports these proposed amendments as they reflect the tenure split advocated in the London Plan and further ensure that the delivery of affordable housing will not harm the overall delivery of housing.

Part B of draft Policy DM13 seeks to apply the affordable housing requirement to, amongst other things, additional residential units that are created through amended applications. The application of this policy is considered to be contrary to the policy purpose for small developers and instead should be applied on a site by site basis, with full consideration given to the sites characteristics and merits of the proposal.



## Employment Protection

Policy DM40 seeks to protect all non-designated employment land that does not fall within designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas, in accordance with Local Plan Policy SP8.

The current drafting of the policy, when taken as a whole, has the effect of affording the same degree of protection to non-designated employment floorspace and sites as designated employment floorspace and sites.

It is not reasonable to seek to provide a blanket protection on all non-designated employment land within the Borough, as this fails to take account of those sites where the loss of an employment use to a more sensitive use is desirable. Further the exception tests are excessively onerous with regard to the requirement for a marketing campaign covering a continuous period of three years in order to justify a change to a non-employment use. This approach is also contrary to the NPPF (paragraph 22), which requires policies to 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 policy needs to be redrafted to provide some exception tests where it would be acceptable to support the loss of non-designated employment land where three years marketing evidence is not possible. Saved UDP Policy EMP4 provides reasonable exception tests that could be added to draft Policy DM40 to this effect. Set out below is suggested wording for policy DM40:

*The Council will seek to retain in employment use any non-designated employment floorspace and sites and planning permission will only be granted to redevelop or change the use of non-designated employment land and floorspace provided:*

*a) the land or building is no longer suitable for business or industry use on environmental, amenity and transport grounds in the short, medium and long term; and*

*b) there is well documented evidence of an unsuccessful marketing/advertisement campaign, including price sought over a period of normally 18 months in areas outside the DEAs, or 3 years within a DEA; or*

*c) the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits.*

Part B of Policy DM40 states that where the Council is satisfied that the loss of non-designated employment land or floorspace is acceptable, it will require new development proposals to apply a sequential approach to delivering an alternative use, prioritising community infrastructure, followed by mixed use development that includes employment generating and/or community uses and lastly residential use. This again is overly onerous and is contrary to the policy aspirations of the NPPF (paragraph 22), as the wording fails to treat proposals for alternative uses on their merits, having no regard to market signals, nor the relative need for different land uses to support sustainable local communities. KA Investments is therefore of the view that this part of the policy is unsound and should be removed.



We trust that our representations will be fully considered and taken into account as the preparation of the various documents continues. If you require any clarification on any matters, or wish to discuss our representations further, please do not hesitate to contact Katie Smith at this office.

Yours faithfully,

DP9

**DP9 Ltd on behalf of KA Investments and Developments Limited**