

COUNCIL STATEMENT

Chapter 06 – Employment and town centres

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?

Policy SP8 sets out the Borough's employment land hierarchy and the principles for managing land uses within it. SP8 is clear that at the higher end of the hierarchy, SIL and LSIS will be safeguarded for industrial uses, and at the lower end, a more flexible approach will be applied in LEAs, recognising their potential role in accommodating a wider range of employment generating uses, particularly to facilitate site renewal and regeneration. DM38 gives effect to SP8 and provides further details in respect of managing LEA-RA land. It sets a framework to facilitate appropriate mixed used development to deliver the spatial strategy, consistent with the strategic policies. SP8 and DM38 are therefore considered to be complementary policies and not at odds.

Haringey's Employment Land Study (2015) findings support applying a rigorous approach to managing LEA-RAs, to retain them for employment generating uses, however recognising the need for flexibility to ensure sites remain viable for development over the plan period. This is reflected in the policy requirements which are considered proportionate and not overly onerous. They take account of development viability and allow for a range of uses to be delivered, whilst supporting broader plan objectives for delivering jobs uplift and securing provision of employment floorspace. The Workspace Viability Study (2014) also lends support to the approach, noting that fully employment led schemes may not be viable in some circumstances, and cross subsidy from higher value uses may be needed to secure employment provision.

Where site allocations for mixed use development are proposed within LEA-RAs, the priority is for employment generating uses; proposals would need to demonstrate that the introduction of appropriate non-employment uses is necessary to deliver employment floorspace and make development viable, in line with Policy DM38.

As LEA-RA land provides for flexibility of uses and offers the potential for a significant uplift, it is considered that proposals should investigate opportunities for LEA-RA sites to meet identified need for gypsy and traveller accommodation, where appropriate. Policy SP3 sets criteria for considering relevant proposals.

Criterion 38.A(e) is included to ensure that proposals for mixed use development do not compromise the integrity of sites to function for employment use, and for the protection of amenity for all site uses and occupiers. Whilst recognising these matters may be covered by design policies in DM Chapter 2, particularly on amenity, it is considered appropriate for this section of the plan to reinforce these principles for employment-led mixed use development.

18. DM39. What is the aim of the policy in the overall context of the London Plan and the Strategic Policies employment strategy? I am not clear on its purpose. Does it seek to provide guidance for new warehouse living or does it relate to legitimising existing uses for specific site allocations (see para 6.20 of the plan). I am not clear on the required master plan approach, would this be part of a planning application for new warehouse living? With 15 criteria, is this too restrictive?

DM39 reflects that there are already established warehouse living communities within certain employment areas of the borough. The overall aim of the Policy is to legitimise this existing use, noting that many benefit from lawful development certificates but the accommodation provided is often unsuitable and not code compliant. However, while seeking to regularise/legitimise the existing use, the Council is conscious that it does not want to unnecessarily compromising the elements that make this alternative form of working and living attractive to the self-employed creative industries that have set up there. **The Council recognises that attempts to retain 'authentic' warehouse living elsewhere in London have not always been successful, and considers that this is in part to establishing a residential land value and to the application of a rigid policy framework. Haringey's approach is to retain the employment land designation applying to these sites and retain employment use, recognising that the provision of new employment floorspace is needed to support businesses, including the area's emerging creative and cultural industries.**

Given the complexity of issues this policy seeks to resolve, along with the bespoke nature of the warehouse living product and the diversity of the Warehouse Living Sites, the number of criteria in DM39 is considered necessary to ensure proposals deliver expected outcomes. Furthermore, as it is unlikely these outcomes can be realised through criteria based assessments alone, a masterplan is preferable as it will enable the wider consideration of the right mix and form of uses, engaging with, and having regard to, the unique needs of the existing warehouse living communities on these sites, including creative work spaces, communal living arrangements, and service needs. It will also provide more scope to ensure retention of the existing amenity that adds to the attractiveness of these sites, while ensuring the accommodation provided (either through alterations to existing buildings or new development) is fit for purpose. The masterplan will need to be submitted at the planning application stage, effectively fulfilling the role of the Planning Statement. The masterplan will help give assurance that proposals maintain the functional integrity of employment land and in doing so, adequately address the needs of the existing warehouse community and maximise the employment generating potential of sites.

In the context of London Plan and the Strategic Policies, Policy DM39 seeks to ensure a sufficient stock of land and premises to meet the needs of different types of businesses and employment uses, and to support new and emerging economic sectors through facilitating the diversification of the local economy. DM39 helps give effect to the Strategic Policies by

ensuring the functional integrity of designated employment land remains intact, ultimately, to support economic growth in line with plan objectives.

19. DM40. Is this policy too restrictive? Part A.b – where is the justification for 3 years marketing? Part B – where is the justification for the sequential approach? Is this supported by national policy or the strategic policies. Part C – see my comments about financial contributions.

The DM40.A(b) requirements have been set in line with the London Plan Land for Industry and Transport SPG which sets out criteria for employment land retention and release (advising a minimum of 2 years site marketing) and also taking into account local evidence, including the Employment Land Study (2015), which recommends the need to protect against the loss of employment land and floorspace in order to meet change economic needs and deliver the Borough's spatial strategy. DM paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure that sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use.

The NPPF is clear that local plans should take account of and plan positively for the infrastructure needed in their area. In line with national policy, Haringey's local plan includes policies to ensure provision of strategic and community infrastructure to support planned growth, including SP1 and SP16. The sequential approach proposed in DM40.B helps gives effect to these policies. It is set recognising the limited supply of land for strategic community infrastructure in an already dense built up urban setting, where there are competing pressures for other uses, along with the comparably lower land values of employment land. Where redundant employment sites are made available, such sites may be crucial to providing the strategic infrastructure needed to support existing and new growth and development, and which may not be practicable or viable to provide elsewhere. The policy therefore seeks to ensure that proposals fully explore such opportunities before defaulting surplus employment land to residential use – noting in particular, that the local plan allocates sufficient sites with sufficient capacity to meet and exceed the Borough's strategic housing requirement, without the need for these surplus employment sites.

20. DM42 – Part A. Why are the uses specified for primary frontages rather than 'appropriate town centre uses' as set out for the secondary frontages?

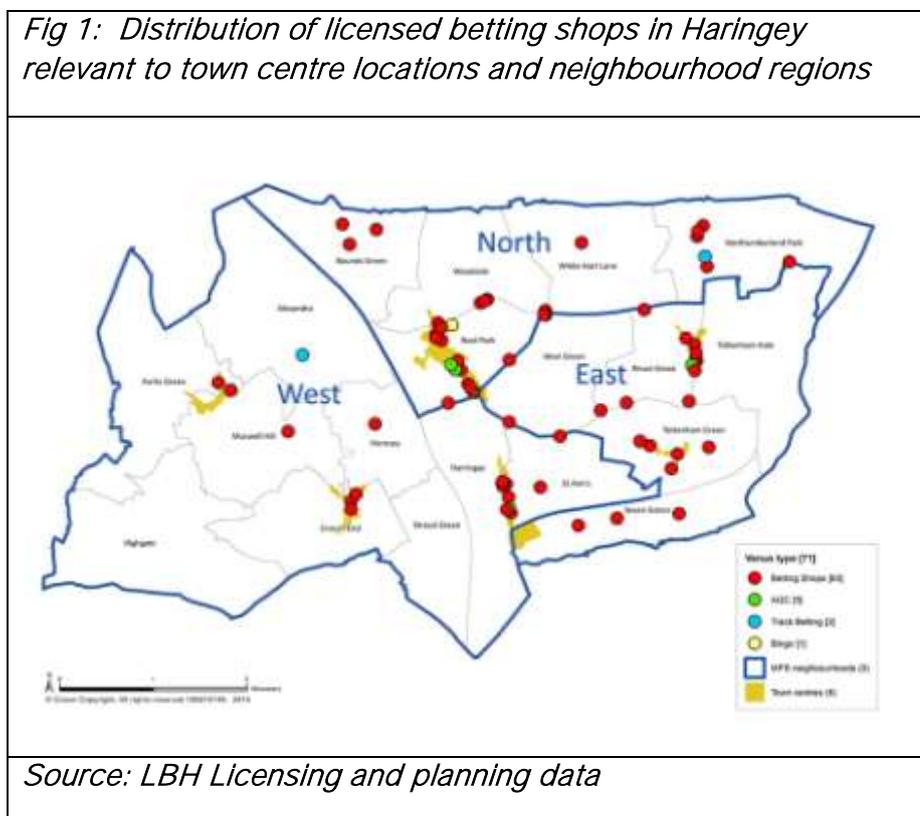
The uses listed in DM42.A are appropriate main town centre uses as defined by the NPPF. It is acknowledged that this list does not cover the full complement of uses set out in the definition, and that the policy wording could be amended to be more consistent with that of DM42.B on secondary frontages.

21. DM46. How is this policy consistent with national planning policy? Is this policy justified? Where is the evidence to show that 5% is a level of saturation/over-concentration for a town centre? How does this affect vitality and viability? Where is it demonstrated that there is a clear link between public health and more than 5% of units in a town centre in this use?

DM46 helps gives effect to London Plan policy 4.8 which provides scope for local plans to manage clusters of uses, including betting shops, as well as SP14 regarding health and

well-being. The policy is also set having regard to the NPPF which provides that one of the three dimensions of achieving sustainable development is for the planning system to perform a social role by supporting “*strong, vibrant and healthy communities*”.

Figure 1 below shows the type and distribution of licensed betting shops in Haringey. This demonstrates an overconcentration in town centres, particularly in Wood Green and Tottenham (almost one-quarter of the Boroughs betting shops are located in Wood Green town centre). Whilst the Council considers that town centres are appropriate locations for this use, it is also necessary to ensure provision for a wide range of uses in order to support town centre vitality and viability, consistent with higher level policies. Indeed, evidence from the London Assembly report “Open for Business: Empty shops on London’s high streets” (March 2013) provides that ‘low quality units’ such as betting shops, reduce the overall value of the high street. The study found strong evidence that reduced diversity impacts on the attractiveness of a centre and therefore footfall.



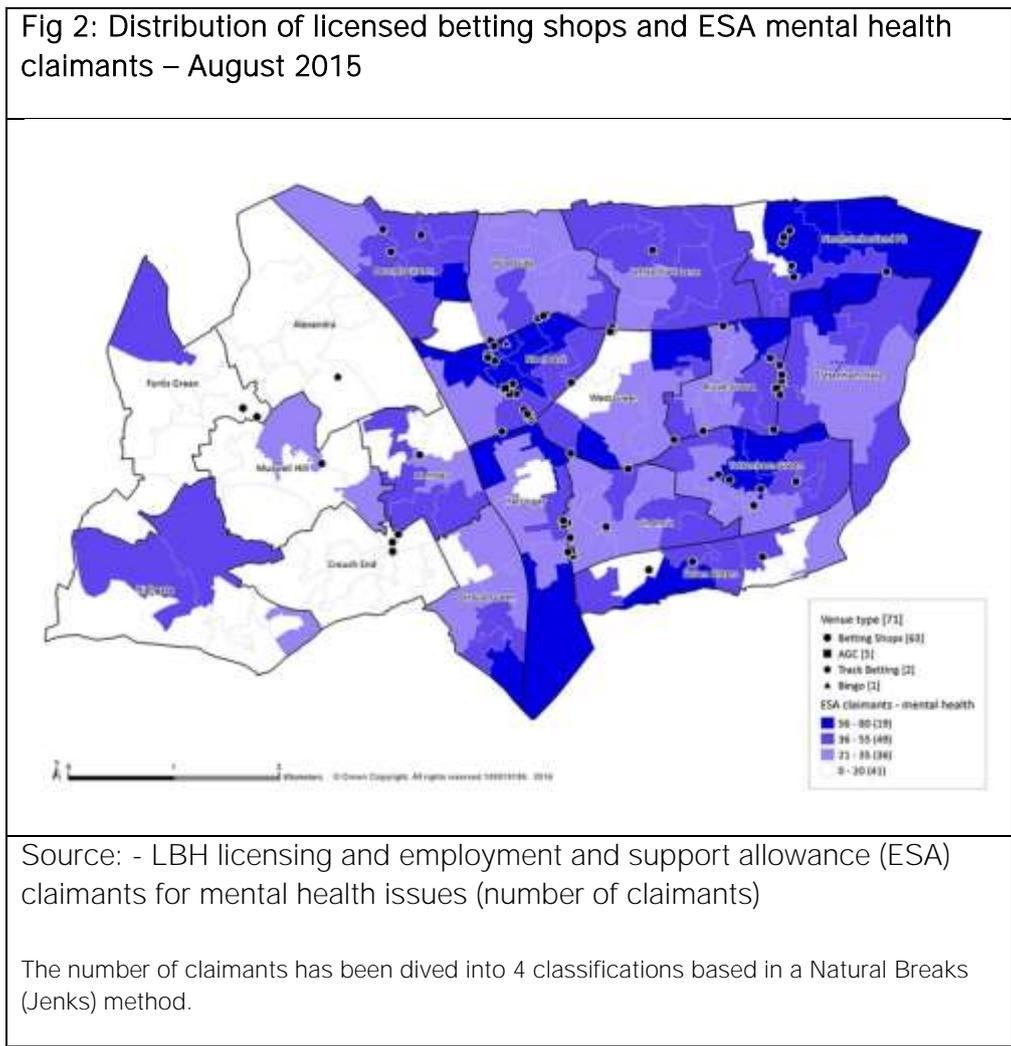
The threshold figure in DM46.B has been set having regard to extensive research and literature examining the links between gambling and health¹. This literature shows that

- Access to gambling venues increases gambling activity and problem gambling. Problem gambling is linked to poor health, low level and severe mental ill health and co-dependence on alcohol;
- Multiple forms of betting, particularly Fixed Odd Betting Terminals by younger adults, can be associated with significant harm to health and wellbeing; and

¹ Refer literature list in Appendix 1.

- Problem gamblers experience the worst health outcomes and tend to live in deprived communities.

Figure 2 shows the distribution of licensed betting shops overlaid by the number of employment and support analysis claimants for mental health in Haringey in August 2015. Some overlap is seen in areas with the highest count of claimants (56 or greater) and clustered locations of licensed betting shops, particularly pockets in Noel Park and Northumberland Park; almost one-quarter (24%) of licensed betting shops are found in these areas. Alternatively only 10 licensed betting shops (14%) are found in areas with the lowest number of claimants (20 or less) that make up 41 in number.



Given above evidence linking health outcomes to the spatial location and proliferation of betting shops, the policy is expected to positively impact on the plan's social objectives. This is supported by the Sustainability Appraisal which concludes that the approach is likely to have 'significant positive effects' in terms of health objectives.

22. DM47. Is this policy justified? Where is the evidence of the spatial link of 400 metres between all types of schools (i.e. primary and secondary), health and hot food

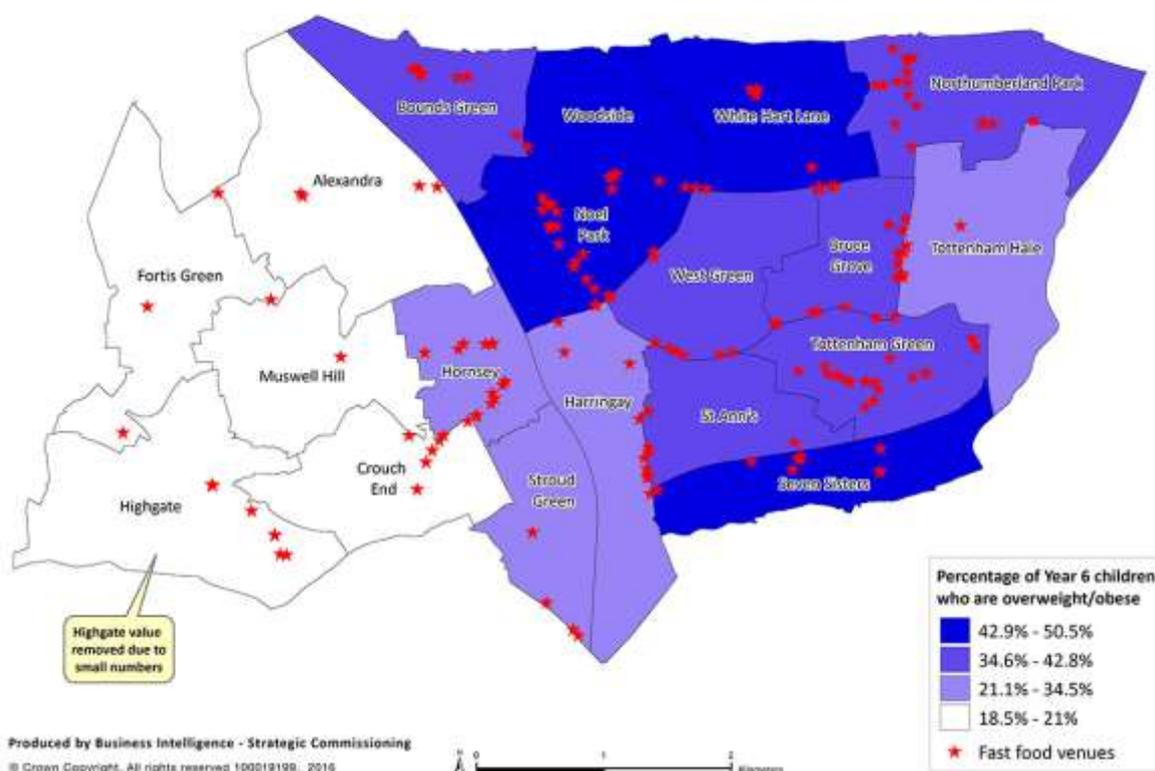
takeaways? Some takeaways provide health options and not all types of takeaways would be used by school children at lunchtime or on the way home? Would the policy reduce choice for all in throughout much of the Borough? There are already takeaways within 400 metres of schools, how will the policy make a difference?

DM47 helps gives effect to London Plan policy 4.8 which provides scope for local plans to manage clusters of uses, including hot food takeaway shops, as well as SP14 regarding health and well-being. DM47 is informed by technical evidence, including the Health Evidence Base (2012) and Hot Food Takeaway Shops: Evidence Base Study (2015), which highlights key issues and challenges in respect of poor health and obesity - in Haringey the top risk factor for early death and poor health is diet. The evidence calls attention to the high number of hot food takeaway outlets in the Borough and the high density of these near primary and secondary schools. Chapter 9 of the 2015 study signposts numerous research and studies exploring the spatial link between schools, hot food takeaways and health. This includes the report by City University London, **Children's Food Choices on the Streets Around Schools in Haringey (2014)**, which investigates factors influencing childhood obesity.

The policy does not set a blanket restriction on hot food takeaways across Haringey. Rather it provides a mechanism for the Council to resist proposals for additional shops where these would lead to a demonstrable overconcentration of takeaways in proximity to schools or within town centres, where there is also a need to ensure a sufficient mix of uses to support centre vitality. The policy provides sufficient flexibility to enable new such development to come forward, where appropriate, and would therefore not unduly restrict choice for residents and visitors across the Borough.

It is well documented that deprived communities, where prevalence of obesity is typically double that of non-deprived communities (which is the case in Haringey), have the highest concentration of takeaways in their areas of residence, making it harder for people to access healthy food. In Haringey there are approximately 170 hot food takeaways, many of which are located in the deprived east of the Borough and within close proximity of schools - 200-400m (illustrated by the boundaries in the figure below). The concentration of hot food takeaways per 100,000 head of the population in the Borough was judged by the **National Obesity Observatory as being in England's top quintile of local fast food outlet concentrations**. This policy therefore forms part of **the Council's approach to promote healthy eating**, particularly in the deprived east of the borough where year 6 children are 2.5 times more likely to be overweight or obese.

Whilst recognising the policy cannot control existing authorised uses, it will help to ensure that any future proposals for takeaways do not lead to an overconcentration of this use in proximity to schools, or further exacerbate the situation where clustering is already an issue. Given above evidence linking health outcomes to the spatial location and **proliferation of hot food takeaways, the policy is expected to positively impact on the plan's social objectives**. This is supported by the Sustainability Appraisal which concludes that the **approach is likely to have 'significant positive effects' in terms of health objectives**.



23. DM48 – please see Inspector’s Note 1 below on planning obligations. There is a relevant policy in the Alterations to Strategic Policies, therefore is DM48 necessary?

SP17 addresses the methods the Council will use to deliver and monitor the implementation of the Local Plan, as set out reference to the development of a s106 policy alongside a range of other implementation means. Further guidance on the use of planning obligations is provided in the supporting text but is not itself policy. The inclusion of DM48 is considered necessary to provide a basis for resisting proposals where these are not policy compliant and impacts cannot be satisfactorily mitigated.

Appendix 1 – Literature supporting DM46 (Issue 21)

- Marshall D. Gambling as a public health issue: the critical role of the local environment. *Journal of Gambling Issues* 2009;23:66-80. Available at <http://dx.doi.org/10.4309/jgi.2009.23.4>
- Hodgins DC, Stea JN, Grant JE. Gambling disorders. *The Lancet* 2011. Available at [http://dx.doi.org/0.1016/S0140-6736\(10\)62185-X](http://dx.doi.org/0.1016/S0140-6736(10)62185-X)
- Young M, Markham F, Doran B. Too close to home? The relationships between residential distance to venue and gambling outcomes. *International Gambling Studies* 2012;12(2):257-73.
- Griffiths M. Problem gambling. *The Psychologist* 2003;16(11):582-4. Available at <http://bit.ly/JBa1gz>
- Betting, borrowing and health. Health impacts of betting shops and payday loan shops in Southwark, Southwark Council, London V2. 7th March 2014. Ben Cave Associates Ltd