

Factual Statement 3 – Planning Policy Statement (PPS) 4 compliance

How the evidence base and subsequent content of the Core Strategy complies with the advice of PPS4 (including job targets, floorspace targets, retail provision, town centre growth & spatial distribution)

1. Introduction

- 1.1 PPS4 *Planning for Sustainable Economic Growth* sets out the Government's comprehensive policy framework for planning for sustainable economic development in urban and rural areas. Economic development is defined as development within the B Use Classes, public and community uses and main town centre uses.
- 1.2 The purpose of this Statement is to present evidence that demonstrates that the Core Strategy policies relating to economic development are justified by a robust evidence base, in compliance with PPS4.
- 1.3 To inform the Council's Core Strategy, Haringey's Employment Study (2008) and Haringey's Retail and Town Centres Study (2008) assess the need for land and floorspace for economic development in the borough. Although the Employment Study and Retail and Town Centres studies were both produced before PPS4 was published, the Council can demonstrate that the evidence base underpinning the economic development policies of the Core Strategy are consistent with the advice of PPS4.

2. The Council's approach to employment and town centres

- 2.1 Chapter Five *Economic Vitality and Prosperity Shared by All* of the Core Strategy is the main chapter which deals with employment land, employment opportunities and town centre uses. The relevant policies in this chapter are SP8 *Employment*, SP9 *Improving skills and training to support access to jobs and community cohesion and inclusion* and SP10 *Town Centres*.
- 2.2 The overall approach towards employment in the Core Strategy is to protect employment land, provide more jobs and training opportunities needed to support Haringey's growing population and by securing land and premises for the borough's businesses.
- 2.3 The approach to town centres in the Core Strategy is to support and promote the borough's town centre hierarchy as existing successful and vibrant town centres and places that will attract new businesses, jobs and homes during the life of the plan. SP10 will also support,

promote and protect the borough's 38 local shopping centres as places that offer unique and often specialist goods and services to their immediate communities.

- 2.4 In addition, to be consistent with PPG13 Transport, planning policies should seek to promote the vitality and viability of existing town centres which should be the preferred locations for new retail and leisure developments. This is reflected in SP10.

Positive Planning

- 2.5 In accordance with Policy EC1: *Using evidence to plan positively*, of PPS4, Haringey's Employment Land Study (2008) and Haringey's Retail Study (2008) assess the need for land and floorspace for economic development in the borough.

Haringey Employment Study

- 2.6 In March 2008, Haringey appointed Atkins to update the 2004 Employment Study in order to provide a review of the provision of and demand for employment land and premises in the borough for the period up to 2026. The Study provided an update on the strategic policy position in relation to employment issues in Haringey and London and the national position (draft PPS4) and set out employment and employment floorspace projections for the borough to inform the borough's Core Strategy and any other associated Local Development Documents.
- 2.7 The Study estimated future employment floorspace need in Haringey amounts to around 137,000 sqm for the period 2006-26. This is consistent with policy EC1.3 (b) of PPS4.
- 2.8 The Study looked at three sets of forecasts to provide a range of potential employment growth paths for Haringey, based on three different scenarios which allowed for an exploration of different influencing factors.
- 2.9 The scenarios indicate that demand for industrial land in the borough is likely to continue declining which will facilitate the managed release of economically obsolete sites to alternative uses. However, at the same time, there is significant scope for economic diversification to take place in Haringey which is supported by a range of policy measures. This will require the upgrading and improvement of significant parcels of employment land in the borough to facilitate the provision of good quality premises which can accommodate business and related services as well as some light industrial activities. Therefore, this will require the provision of a range of good quality B1 premises suitable for a range of business sizes and types.

- 2.10 The Study recommended that the Core Strategy policy focuses on facilitating the restructuring of the borough's employment land portfolio to allow an increase in B1 floorspace whilst enabling the managed transfer of obsolete industrial sites to alternative uses. This approach is more likely to assist in stimulating sustainable economic growth compared to an approach which focused on a significant net increase or decrease in the total supply of employment land in the borough. This scenario is the most appropriate for Haringey, given measures being taken to diversify the local economy and to introduce more higher-value activities to the borough.
- 2.11 To accord with policy EC2.1 (g) of PPS4, employment growth projections for the north London sub-region are included in the Core Strategy. Haringey has a key role in contributing to this target. An ambitious but realistic jobs target could help to focus our policy and projects. However, setting a realistic and deliverable jobs target will be largely contingent on whether the Upper Lee Valley becomes a designated Enterprise Zone area; this will provide the necessary local levers to effect significant change in relation to jobs growth.
- 2.12 It is considered that, although the Employment Study was produced before the final PPS4 was published; the evidence is consistent with the government's objectives for economic development.

Retail and Town Centres Study

- 2.13 Nathaniel Lichfield & Partners was commissioned to prepare a Retail and Town Centres study, including an assessment of the Metropolitan and District Centres, in line with national guidance on town centres, PPS6. A key objective of the study was to provide robust evidence to support the Council in formulating policies on retail provision in the Core Strategy, and subsequent Development Management policies and Site Allocations DPDs.
- 2.14 The key objectives of the study were to assess the need for retail floorspace up to 2011, 2016 and 2021, reflecting social and demographic changes and provide a qualitative assessment of the range and distribution of shopping designations (the borough's one Metropolitan Town Centre, five District Centres and 38 Local Shopping Centres). This also meets the requirements set out in policy EC1.3 of PPS4.
- 2.15 The Retail Study concluded that, in order to meet projected growth in expenditure there is a need for additional shopping and service facilities. The floorspace projections between 2008 and 2016 are the priority with medium to longer term up to 2021. The projections should not be considered to be maximum or minimum limits or targets, as some schemes may come forward outside the specified time limits.

- 2.16 The existing stock of premises may have a role to play in accommodating projected growth. The evidence assumes that existing retail floorspace, can on average, increase its turnover to sales floorspace densities. The floorspace projections reflect these assumptions. In addition, vacant shops could help to accommodate future growth. Potential development sites will need to be identified through the Sites DPD process to accommodate longer term growth.
- 2.17 SP10 is consistent with the objectives of policy EC2 in PPS4 in focusing new development of main town centre uses (retail, leisure, arts, culture and entertainment) in its existing Metropolitan Town Centre and District Centres and protecting local shopping facilities with the aim of offering a wide range of services to local communities. This also reflects the findings of the Retail Study, that all development should be appropriate in terms of scale and nature to the centre in which it is located.
- 2.18 The Council is undertaking a Local Economic Assessment to understand local business needs and likely changes in the market. This is due to be completed by September 2011 and will further inform the delivery and implementation of the Core Strategy and other Local Development Documents.

Spatial distribution of economic growth

- 2.19 To accord with policy EC3.1bi, choices have been made in the Core Strategy about which town centres will accommodate the identified need for growth as identified in the Retail Study. This is shown in SP10. The Core Strategy therefore identifies the type and quantity of retail development achievable across the borough and protects and enhances the town centres and local shopping centres.
- 2.20 SP10 clearly defines the network and hierarchy of town centres in accordance with policy EC3.1b of PPS4. This consists of:
- Metropolitan Town Centre (1);
 - District Centres (5);
 - Local Shopping Centres (38);
 - Smaller shopping parades and individual shops.

In doing so and based on the recommendations from the Retail and Town Centres Study, the Core Strategy takes forward the borough's existing town centre hierarchy as shown in Haringey's Unitary Development Plan.

- 2.21 Haringey's Employment Study estimates a total floorspace requirement of approximately 137,000 sqm for the period 2006 – 2026. To meet this growth, the Study recommended that the Defined Employment Areas (DEAs) designated in the 2006 UDP are strongly

protected to provide choice and flexibility in employment land. SP8 has taken forward this recommendation. However, the DEAs have been re-named to reflect changes to the London Plan and the Mayor's SPG on Industrial Capacity. The hierarchy consists of:

- Strategic Industrial Land;
- Locally Significant Industrial Sites;
- Local Employment Areas (Employment Land and Regeneration Areas).

3. Clear economic vision and strategy

- 3.1 Haringey's Spatial Vision, strategic objectives and spatial strategy set out a clear economic vision and strategy for the borough in accordance with PPS4 Policy EC2: *Planning for Sustainable Economic Growth*. The Core Strategy positively and proactively encourages sustainable economic growth linking deprived areas with the employment benefits arising from the development of major sites and key locations in the borough.
- 3.2 There is a strong emphasis on employment and training. Strategic Policy 8 *Employment* and Strategic Policy 9 *Improving skills and training to support access to jobs and community cohesion and inclusion* address the requirement in Policy EC2 of PPS4 to support existing business sectors, new or emerging sectors such as green industries and small and medium sized enterprises.
- 3.3 The guidance in PPS4 contains an objective which highlights the importance of conserving and preserving the heritage of centres as a way to enhance a sense of place. It is not the role of the Core Strategy to duplicate/repeat national guidance, however for clarity and in response to the representations made by English Heritage, the Council has proposed to amend paragraph 5.3.22 to reflect that the conservation and enhancement of the historic, archaeological and architectural heritage of centres is an important element of town centre management strategies.
- 3.4 The Core Strategy sets out a strategy for the management and growth of town centres over the plan period in accordance with PPS4 Policy EC3: *Planning for Centres*. Strategic Policy 10 *Town Centres* defines a network and hierarchy of centres. The spatial arrangements of retail centres provides a basis for shaping Haringey, for locating community infrastructure and building attractive and distinctive focal points for neighbourhoods for sustainable growth and regeneration of the borough.
- 3.5 In line with PPS4 Policy EC3.1 bi: *Planning for Centres* there is an intention to designate Tottenham Hale as a District Centre over the life of the Core Strategy. The site offers an opportunity to expand the

retail offer in the area, particularly comparison shopping. This presents an opportunity to review shopping provision and encourage uses that provide cohesion and connectivity to the two District Centres; Tottenham High Road/Bruce Grove and Seven Sisters/West Green Road. This policy approach also reflects the draft Replacement London Plan and the GLA Town Centre Health Check (2009). The future re-classification of Tottenham Hale may be appropriate subject to capacity analysis, impact assessments, land use, transport accessibility, planning approvals and full implementation.

- 3.6 Strategic Policy 10 also seeks to promote new investment in the town centres to deliver good economic outcomes, consistent with the overall approach to growth as set out in Strategic Policy 1 *Managing Growth* and PPS4 Policy EC4: *Planning for Consumer Choice and promoting competitive town centres*. Bringing shop vacancies back into use will help achieve the anticipated required growth in comparison floorspace and this will promote greater diversity in the range of facilities being provided and act as a community hub.
- 3.7 In order to strengthen the role of Wood Green Metropolitan Centre, development proposals which foster a diverse evening and night time economy will be supported, as set out in PPS4 Policy EC4.2a *Planning for Consumer choice and promoting competitive town centres*.

4. Monitoring

- 4.1 In line with PPS4 Policy EC9: *Monitoring* indicators have been developed to monitor the delivery of SP8, 9 and 10. These indicators will be included in the Council's Annual Monitoring Reports (AMR). The AMRs will be used to keep the following matters under review in order to inform consideration of the impact of policies and planning applications:
- The network and hierarchy of centres (at both the regional and local levels)
 - The need for further development and
 - The vitality and viability of centres (at the local level).
- 4.2 Town centre locations will continue to be monitored closely through regular town centre health checks in line with PPS4 and the London Plan.
- 4.3 In addition, in line with the findings of the Retail Study, the Council will monitor and update the centre health checks on a regular basis, in order to assess changes in the vitality and viability of centres.

5. Conclusions

- 5.1 The local evidence base for the Core Strategy policies on economic development can be found in Haringey's Employment Study (2009) and the Retail and Town Centres Study (2008).
- 5.2 Although, both studies pre-date PPS4 Planning for Sustainable Development, the Council considers that the evidence base meets the requirements of PPS4 and that the policies for economic development within the Core Strategy set out a clear economic vision and strategy for Haringey which positively and proactively encourages sustainable economic growth.