



## **Hearing Statement - Tottenham Area Action Plan**

### **Introduction**

This statement has been prepared on behalf of my client Mr Green, in response to the Inspector's Draft Matters and Issues for Examination of the Tottenham Area Action Plan for London Borough of Haringey.

This response directly addresses the issues and matters raised by the inspector in point 22 under matter 4 of the Matters and Issues document.

### **Point 22 under Matter 4 – TH11 (Fountayne Road)**

*TH11. Whether the policy is too restrictive in only seeking 'warehouse living' rather than any other type of residential unit? Is this justified?*

Policy TH11, paragraph 5.173 states the allocation for this site should provide '*potential development to increase accessibility and provide increased employment floorspace and warehouse living accommodation.*' Whilst the principle of introducing the Warehouse Living policy is supported, the wording of the policy is too restrictive and should be reworded to allow for a more flexible approach to housing provision, supporting new residential accommodation on the site, in line with local strategic, regional and national policy. The individual circumstances of the site should be considered, and this policy as currently drafted will prevent future alternative and appropriate development opportunities from being realised. Further justification for this has been set out in the following paragraphs:

### **Inconsistent with national, regional and strategic policy**

The ninth core planning principle of the NPPF promotes mixed use developments. At para 157 the NPPF also requires Local Plans to allocate sites to promote development and flexible use of land. Section 6 of the NPPF supports the delivery of a wide choice of homes.

LB Haringey' Strategic Policy SP8 defines regeneration areas as the most flexible of categories as it can include uses appropriate in a mixed use development, such as small scale retail, community and residential uses. Emerging Development Management Policy DM11 requires mixed-use schemes comprising residential accommodation to provide a mix of housing.

Policies 2.6, 2.7, 3.3, 4.2 4.3 of The London Plan also strongly support mixed use development.

By only seeking 'warehouse living' rather than other types of residential units for this site allocation, the policy does not comply with Haringey's strategic policy, emerging development management policies, nor London Plan or NPPF and is therefore too restrictive.

We recommend the policy is amended to reflect addition of other forms of housing.

### **Viability of the Designation**

Guidance for new warehouse living; as the Glossary of Terms (DM DPD Appendix F) clarifies this type of accommodation to be: "Purpose built and genuine integrated working and living accommodation specifically targeted at the creative industries sector".

Given Warehouse Living is considered to be a concept whereby floorspace is integrated to provide a combination of both living and working, Paragraph 22 of the National Planning Policy Framework should be regarded, and it states '*Planning policies should 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. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the*

*allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'*

Therefore, the designation of the land at Fountayne Road for warehouse living is too restrictive and does not accord with paragraph 22 of the NPPF. A more flexible approach to land use on this site should be encouraged which will maximise the opportunity here and ensure that development is not prevented due to the restrictive wording of this policy.

Furthermore, traditionally warehouse living accommodation has been affordable and appealed to those seeking both affordable workspace and living space. Should the type of residential accommodation be restricted to warehouse living only, it is likely to not be viable for a developer to provide such affordable floorspace. This may restrict a scheme being brought forward as it would present an unviable development opportunity, therefore the allocation does not accord with para 173 of the NPPF.

#### **Inconsistent with the Re-provision of Employment Floorspace**

Point 6 under Matter 2 within the Matters and Issues report states '*are the policies which seek mixed use consistent and reasonable in their approach to re-provision of employment floor space? What is meant by cross subsidise, and why does it apply to some mixed use policies (SS4, TH6, TH12, TH13) and not others? Can it be demonstrated to be viable? Why do some mixed use policies (BG4, TH9) seek replacement employment and others do not?'*

Policy TH11 called for an increase in the employment floorspace on the site, however this contradicts the mixed use designation of the site and has the potential to negatively impact on the prospect of warehouse living / residential accommodation being brought forward.