

To: **Planning Policy, London Borough of Haringey**
 From: **Iceni Projects Ltd on behalf of Berkeley Homes (North East) London**
 Date: **27 March 2015**
 Title: **Written Representations to the London Borough of Haringey’s Local Plan – February to March 2015**

These written representations respond to:

- the Alterations to Strategic Policies 2011-2026 (formerly Core Strategy) Feb 2015; and
- Preferred Option Development Management Policies (Feb 2015).

As outlined in detail below.

a. Alterations to Strategic Policies 2011-2026 (formerly Core Strategy) Feb 2015

Ref	Relevant text from documents	Comments – support/suggest/object
Para 1.3.11	<p>The London Plan identifies Tottenham Hale as an Area of Opportunity Area within the London Plan, and proposed to be designated a Housing Zone with the potential to provide more than 2,500 5,000 new homes and a substantial number of jobs, as well as a mix of commercial, retail and leisure uses.</p>	<p>Support/Suggest</p> <p>Strongly support the inclusion of Tottenham Hale as a Housing Zone and its inclusion as a Strategic Policy.</p> <p>Suggest that projected jobs figures are included.</p>

<p>Policy SP1: Managing Growth</p>	<p>The Council will focus Haringey's growth in the most sustainable locations, and manage it to make sure that the Council delivers the opportunities and benefits and achieve strong, healthy and sustainable communities for the whole of the borough. The Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802 homes over the plan period 8,200 homes from 2011-2021 2026 (820 per annum). The Council will promote development in the following Growth Areas:</p> <ul style="list-style-type: none"> • Haringey Heartlands; and • Wood Green Metropolitan Town Centre; • Tottenham Hale.; and • North Tottenham (which includes Northumberland Park, the redevelopment of Tottenham Hotspur Football Stadium, and High Road West). <p>The Council will expect development in the Growth Areas to:</p> <ul style="list-style-type: none"> • Provide approximately 13,000 5,000 new homes and the majority of new business floorspace up to 2026; • Maximise site opportunities; • Provide appropriate links to, and benefits for, surrounding areas and communities; • Provide the necessary infrastructure; and • Be in accordance with the full planning policies and objectives. <p>The Council will promote development in the following Areas of Change:</p> <ul style="list-style-type: none"> • Wood Green Metropolitan Town Centre; • Northumberland Park (which includes the redevelopment of Tottenham Hotspur Football Stadium); • Tottenham High Road Corridor; and • Seven Sisters Corridor. <p>Parts of the borough outside of the Growth Areas and Areas of Change will experience some development and change. The</p>	<p>Support</p> <p>Support the Council's aim to maximise and exceed its strategic housing target.</p> <p>Support the promotion of development in Growth Areas and Areas of Change, and the Council's recognition that development may come forward outside these identified areas. Berkeley Homes would support the promotion/maximisation/optimisation of delivery, to deliver the housing required.</p>
--	---	---

	Council will ensure that development in these Areas of Limited Change will respect the character of its surroundings and provide environmental improvements and services.	
Para 3.1.23	The town centre boundary has been was tightly drawn as defined by in the UDP (2006). However, in planning for the future intensification of the town centre, opportunity sites will be considered that lie beyond the UDP town centre boundary.	Support Support the Council's recognition that sustainable development opportunity sites for development may lie outside designated town centres.
Policy SP2: Housing	The Council will aim to promote homes to meet Haringey's housing need and to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the target of 8,200 homes from 2011-21 (820 units per annum) 19,802 homes from 2011-2026 (820 units from 2011-2014 and 1,502 units from 2015-2026) .	Support Support the Council's aim to maximise and exceed its strategic housing target.
Policy SP2: Housing	Complies with the housing design standards and space standards set out in the Council's Housing SPD 2009 and adopts the GLA housing space and child play space standards 2009 as Haringey's own standards. SPG (2012) and the London Plan and the play space Recreation SPG 2012;	Suggest/Object Suggest that the London Plan and accompanying SPG provide guidance. The provision of such spaces needs to be taken into consideration having regard to the particular site and its own constraints. The provision of on-site amenity and child playspace, should be applied flexibly to relate to the individual circumstances of the site and proposed development.
Policy SP2: Housing and para 3.2.23	Subject to viability, sites capable of delivering 10 units of more will be required to meet a borough wide affordable housing target of 50 40 %, based on habitable rooms;	Support Support the reduction in affordable housing target, in line with the outcome of the Council's up to date evidence base document.
Policy SP2: Housing and para	Delivering an affordable housing tenure split of 70% 60% affordable rent (including social rent) and 30% 40% intermediate	Support Support the Council's decision to bring the tenure split in line with

3.2.19	<p>housing;</p> <p>The preferred affordable housing mix, in terms of unit size and type of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing needs, as set out in the Haringey Housing Strategy SPD.</p>	<p>London Plan requirements and scheme viability.</p> <p>Support the proposal to determine mix on a site by site basis.</p>
Para 3.2.6	<p>In addition, it is expected that over the plan period there will be sites that come forward for housing other than those already identified. These sites are known as ‘windfall sites’ and will contribute towards meeting housing need in Haringey. Such sites will be assessed to ensure that they meet the needs of the community and do not harm the surrounding environment.</p>	<p><u>Support</u></p> <p>Strongly support the Council’s recognition that windfall sites will contribute to meeting and exceeding the housing need in Haringey and London.</p>
Policy SP2 and Para 3.2.7	<p>The Council will expect all new development to be built to the highest quality standards in line with the London Housing Design Guide the London Plan and Mayor’s Housing SPG. and will assess housing densities in planning applications in line with those set out in the London Plan Density Matrix while taking account of Haringey’s urban, suburban and central density settings as shown in Haringey’s Urban Characteristic Study 2014.</p>	<p><u>Suggest/Object</u></p> <p>This policy unsound, as it is not consistent with national policy.</p> <p>Development proposals should be design-led. The key consideration for any development should not be density, which is simply a calculation of the number of homes against the size of unit, but of the quality of the proposed development and the place it will create, in its context.</p> <p>An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space. Policy SP2 should be amended to reflect this.</p> <p>It should be noted that the Housing SPG is merely guidance and therefore any application will not need to be fully in line with this document.</p>

<p>Policy SP8: Employment</p>	<p>The Council will secure a strong economy in Haringey and protect the borough’s hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites, and Local Employment Areas and other non-designated employment sites.</p> <p>To ensure the policy addresses the full complement of employment land in the borough.</p>	<p>Object</p> <p>This policy is unsound – it is not justified and is not consistent with national policy.</p> <p>The policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites.</p> <p>Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with <u>emphasis added</u>) “Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest <u>further decline in industrial and warehousing employment which is expected to result in some surplus employment land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to contribute to Haringey’s housing and regeneration objectives.</u> At the same time, it will be important that <u>fit-for-purpose, well occupied B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities.</u>”</p> <p>“The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community. At the same time, <u>there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough’s housing and regeneration pressures.</u>”</p> <p>The release of an employment site for an alternative use can lead</p>
-----------------------------------	--	--

		to the regeneration of an area through the introduction of new investment. The potential for a sites release from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.
--	--	--

b. Preferred Option Development Management Policies (Feb 2015)

Ref	Relevant text from documents	Comments – support/suggest/object
Policy DM3: Privacy and protection from overlooking	All dwellings should provide a reasonable amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development, including a distance of no less than 20m between facing 1st floor habitable room windows of neighbouring homes	<p><u>Object</u></p> <p>Policy DM3 is unsound as it is not justified or consistent with national policy.</p> <p>While it is agreed that dwellings should provide a reasonable amount of privacy to the residents and neighbouring properties, this needs to be considered in context and on a site by site basis</p> <p>Haringey is a London borough which has developed organically overtime. This has created a rich fabric of urban grain, plot widths and development pattern, where distance between facing habitable rooms can be a lot less than 20m. For example the width of a typical Victorian street (with front bedrooms facing each other) is typically 13m.</p> <p>An arbitrary rule of 20m is ineffective and is not justified by the evidence base. It does not take account of site characteristics, such as topography, orientation of buildings and design features, and would lead developers to building taller, where this might not</p>

		<p>be the most appropriate design-led solution for the site.</p> <p>Furthermore, the borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying rigid policies such as this, will inevitably hinder the Council's delivery of housing including affordable housing</p> <p>A proper application of Policy DM1 and DM2 would make this policy redundant. It should be deleted.</p>
<p>Policy DM5: Siting and design of tall buildings</p>	<p>A. Tall buildings will only be acceptable in areas identified on Map 2.2 as being suitable for tall buildings.</p> <p>B. Where tall buildings are acceptable in principle, having regard to A above, proposals must be informed by a masterplanning exercise in consultation with the Council, which must demonstrate how the proposal:</p> <ul style="list-style-type: none"> a. Relates to the adjacent and surrounding buildings in terms of bulk and massing and the space surrounding them; b. Responds to the local and historic environment; c. Is of the highest quality d. Might provide a landmark buildings which by its distinctiveness can act as a wayfinder or marker; and e. Considers the impact on ecology and microclimate 	<p>Object</p> <p>The Policy is unsound as it is not consistent with national or regional policy</p> <p>This Policy should not put a ceiling on the appropriate height of buildings in the borough nor should it be setting out a 'blanket approach' towards heights. The Council's evidence base is noted and is a helpful baseline consideration for understanding the nature of building heights across the borough. However, proposals for tall buildings should be considered on their individual merits and emerging context and the Council should not rely on an arbitrary figure.</p> <p>The policy should be amended so that building heights are not applied rigidly to each site within each area.</p> <p>Again, the borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying onerous policies such as this, will inevitably hinder the Council's delivery of housing.</p>
<p>Policy DM14: Façade Retention</p>	<p>A. Proposals for substantial demolition behind the existing facade and its reconstruction would not normally be acceptable because of the need to retain the architectural integrity and</p>	<p>Object</p> <p>This policy is unsound as it is not justified and is not consistent with</p>

	<p>cellular plan form of the traditional buildings. Considerations would also be given to issues of structural stability and economic feasibility of rebuilding the original building.</p> <p>B. Where the existing interior is undistinguished or has been subject to extreme alterations, or where the removal of the building would have an adverse impact on the wider townscape of the area, the retention of at least</p> <p>front and side facades may be acceptable. These facades, however, should be innovatively and carefully integrated with the new build in terms of floor to ceiling heights, window position, roof details and thermal behaviour.</p>	<p>national policy.</p> <p>This policy appears to relate to all buildings, regardless of whether they are heritage assets (and designated or non-designated). It is surprising that this is the Council's intention, it is assumed that this policy was meant to be applied to listed buildings, locally listed buildings and buildings of merit in a conservation area.</p> <p>A balanced judgement on façade retention of a heritage asset should be based on an understanding of the asset's significance. The policy does not convey this.</p> <p>This being the case, the judgement to whether the façade or side facades of a building can be adequately taken in accordance with either Paragraph 133-135 of the NPPF. Draft Policy DM14 should be deleted.</p>
<p>Policy DM16: Housing Supply</p>	<p>D. Windfall development will be considered acceptable where this complies with all relevant policies of this Plan.</p>	<p><u>Support/Suggest</u></p> <p>Support the Council's recognition that windfall sites will play a role in exceeding housing delivery targets. Windfall fall sites should be seen as a positive opportunity.</p> <p>Berkeley Homes would support a revision to the policy to that the Council will look upon windfall opportunities positively, wherever possible.</p>
<p>Policy DM17: Housing Mix</p>	<p>B. The Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach (see</p> <p>Policies DM1-3) having regard also to the findings of the Haringey Urban Characterisation Study (2014).</p>	<p><u>Object</u></p> <p>As outlined for Policy SP2, this approach to density is unsound, as it is not consistent with national policy.</p> <p>Although it is agreed that development proposals should be design-led, the key consideration for any development should not be density, which is simply a calculation of the number of homes</p>

		<p>against the size of unit, but of the residential quality of the proposed development and the place it will create, in its context. The proposed policy notes that density will be applied in line with the London Plan Policies; however, Mayoral guidance (Mayor's Housing SPG) clearly states that the density policy and matrix set out in the London Plan should not be utilised in a prescriptive manner and that where appropriate, higher densities should be achieved.</p> <p>The Haringey Urban Characterisation Study 2014 is helpful but should only be used in practice as an indicative baseline guide to development and the policy should be updated to reflect this.</p> <p>An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space.</p> <p>Para 3.9 of the supporting text suggests an approach such as this but the wording of the Policy itself should be relaxed, to allow easy application.</p>
<p>Policy DM19: Affordable Housing</p>	<p>Policy DM19 Affordable Housing</p> <p>A. The Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate 10 or more dwellings, having regard to:</p> <p>a. Policy SP2 and the achievement of the borough-wide target of 40% affordable housing provision;</p> <p>b. the need for 60% provision to be social/affordable rent and 40% intermediate housing;</p>	<p>Support/Suggest/Object</p> <p>Strongly support the Council's approach to seeking the maximum reasonable amount of affordable housing on a site by site basis and support the reduction in affordable housing to 40%.</p> <p>Suggest it is important that there is flexibility on affordable housing requirements to ensure new housing can be delivered, and be of a tenure which will really encourage long term change.</p> <p>Object with DM19d). The Policy is unsound and is not consistent with national policy.</p> <p>Viability and deliverability are key to securing national policy's</p>

<p>c. the preferred affordable housing size mix Housing Strategy;</p> <p>d. the individual circumstances of the site;</p> <p>e. the availability of public subsidy;</p> <p>f. development viability; and</p> <p>g. other planning benefits that may be achieved.</p> <p>B. To ensure the above Policy is applied fairly and consistently, the affordable housing requirement will apply to:</p> <p>a. sites that are artificially sub-divided or developed in phases;</p> <p>b. additional residential units that are created through amended planning applications;</p> <p>c. additional residential units proposed above that granted by permitted development;</p> <p>d. unsecured student accommodation (see Policy DM19D(e));</p> <p>e. all forms of Use Class C3 housing, and</p> <p>f. the total (gross) residential units to be delivered on the site.</p> <p>C. The Council may seek to alter the tenure and/or mix of affordable provision to be secured on a case-by-case basis to avoid affordable housing of a certain tenure or size being over or under represented in an area, or to assist in improving development viability (e.g. through provision of a greater ratio of intermediate housing.</p> <p>D. in negotiating the level of affordable housing provision viability assessments must be based on a standard residual valuation</p>	<p>aspiration of sustainable development, as outlined in Paragraph 173 of the National Planning Policy Framework (NPPF).</p> <p>Land or site value is central to the consideration of viability and the most appropriate way to assess this value can vary. The National Planning Policy Framework is clear that in all cases estimated land or site value should:</p> <ul style="list-style-type: none"> • <i>reflect emerging policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;</i> • <i>provide a competitive return to willing developers and land owners; and</i> • <i>be informed by comparable, market-based evidence wherever possible.</i> <p>The CLG guidance on section 106 and affordable housing requirement states: <i>'Any purchase price used should be benchmarked against both <u>market values</u> and sales prices of comparable sites in the locality' (Annex A page 7). (Our emphasis)</i></p> <p>The RICS guidance is clear that in a planning context, the EUV approach is unsuitable for financial viability assessments. The guidance explains that the method is: <i>'an accounting definition of value for business use and, as such, hypothetical in a market context. Property does not transact on an EUV basis'.</i></p> <p>The draft Policy should be revised to allow for other methods of accounting for land value, such as the market value approach.</p>
--	---

	<p>approach with the benchmark land value taken as the existing/ alternative use value.</p> <p>E. To maximise affordable housing output on schemes with a long build out period and/or at times of economic uncertainty, the Council may require the London Plan.</p> <p>F. On-site provision of affordable housing will be required. Only in following exceptional circumstances may an off-site provision be acceptable:</p> <ul style="list-style-type: none"> a. Secure a higher level of affordable housing on an alternative site b. Secure a more balanced community c. better addresses priority housing needs <p>G. Cash in-lieu contributions are only acceptable as a last resort and are also subject to the exceptional circumstances listed above.</p>	
<p>Policy DM30: Decentralised Energy</p>	<p>Policy DM30 Decentralised Energy</p> <p>A. Development proposals that contribute to the provision and use of Decentralised Energy (DE) network infrastructure will be supported in principle, subject to other policy requirements being met.</p> <p>B. Communal energy systems</p> <ul style="list-style-type: none"> a. All major development should, where financially viable, incorporate site-wide communal energy systems which serve all energy demands within the development from a common system, irrespective of whether it is connected to a DE network. 	<p>Object</p> <p>This draft policy is unsound as it is not fully consistent with national policy, in particular Paragraph 96, which requires planning application to <i>'comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it is can demonstrated by the applicant, having regard to the type of development involved its design, that it is not feasible or viable'</i>.</p> <p>References are made at points through the policy to viability and feasibility, which is supported; however this is not applied consistently and the draft policy should be updated to reflect this.</p>

	<p>b. All development which incorporates site-wide communal energy systems should optimise opportunities for extending such systems beyond the site boundary, to supply energy to neighbouring existing and planned future developments.</p> <p>C. Existing and planned future DE networks</p> <p>a. All development proposals should prioritise connection to existing or planned future DE networks.</p> <p>b. All major development located within 500 metres of an existing DE network, and minor new-build development located within 25 metres, will be required to secure connection to that network.</p> <p>c. All major development located within 500 metres of a planned future DE network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to secure connection to that network.</p> <p>d. Where connection to an existing or planned future DE network is required, applicants must submit a feasibility assessment so the Council can determine whether a connection is technically feasible and financially viable.</p> <p>D.</p> <p>a. All major development located within 500 metres of a DE network 'connection zone' will be required to be designed for connection to a DE network.</p> <p>b. All minor new-build development located within 25 metres of a DE network 'connection zone' will be required to be designed for connection to a DE network, where reasonably practical.</p>	
--	--	--

	<p>E. Customer charters</p> <p>a. Where site-wide communal and district heating systems are operational, the Council will strongly encourage heat and energy service providers to enter into Customer Charters with domestic and micro-business customers.</p>	
Policy DM43: Parking and para 4.152	For larger developments the parking requirement will be assessed on an individual basis as part of the Transport Assessment or Statement.	<p>Support</p> <p>Support the assessment of parking for larger developments on a case-by-case basis. Research undertaken by WSP on behalf of Berkeley Group demonstrates that the provision of car parking does not necessarily lead to a proportionate increase in car ownership and trips.</p>
Policy DM48: Safeguarding Employment Land and Sites and para 5.8	<p>A. The Council will safeguard for employment use land within its designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas, in accordance with Local Plan Policy SP8.</p> <p>B. Outside of these areas, the Council will seek to retain in employment use any non-designated employment floorspace and sites.</p> <p>5.8 In addition, throughout the borough there are a number of individual non-designated employment sites which provide local jobs. The Council recognises the important contribution these sites collectively make to the local economy, especially when their cumulative economic impact is considered. Unless these sites are given protection, there is a risk they will be lost to other types of development, such as residential uses, which are generally higher value land uses offering greater return for investors.</p>	<p>Object</p> <p>This policy is unsound – it is not justified and is not consistent with national policy.</p> <p>The policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites.</p> <p>Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with <u>emphasis added</u>) “<i>Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest <u>further decline in industrial and warehousing employment which is expected to result in some surplus employment land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to contribute to Haringey’s housing and</u></i></p>

		<p><i>regeneration objectives. At the same time, it will be important that fit-for-purpose, well occupied B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities.”</i></p> <p><i>“The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community. At the same time, <u>there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough’s housing and regeneration pressures.</u>”</i></p> <p>The release of an employment site for an alternative use can lead to the regeneration of an area through the introduction of new investment. The potential for a sites release from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.</p>
<p>Policy DM50: Facilitating Site Regeneration and Renewal</p>	<p>A. The Council will support proposals for mixed-use redevelopment on sites where this is necessary to facilitate renewal and regeneration (including intensification) of existing employment land and floorspace. Such mixed use proposals will only be acceptable where the meet all of the following criteria:</p> <p>a. They are located within designated Local Employment Area: Regeneration Areas or non-allocated employment sites with high levels of public transport accessibility;</p> <p>b. It can be suitably demonstrated that, for reasons of viability, a mixed use scheme is necessary to facilitate delivery of employment floorspace;</p> <p>c. The maximum amount of employment floorspace is re-</p>	<p>Object</p> <p>This draft Policy is unsound as it is not justified and does not appear to be in line with the recommendations of the Atkins Employment Land Review 2015.</p> <p>It is not reasonable, and it is restrictive, to expect development sites to re-provide existing employment floorspace with no net loss. This doesn’t take account of the existing and proposed employment density and job creation of the site, or market signals and local circumstances. It also does not consider the changing nature of the workplace, homeworking and secondary employment locations and the role of town centres.</p>

	<p>provided within the mixed use scheme, with no net loss of existing employment floorspace;</p> <p>d. A proportion of the employment floorspace is provided as affordable workspace; and</p> <p>e. The proposed new use will not conflict with or inhibit the continued business function and viability of the site.</p>	<p>The draft Policy should be amended in this regard.</p>
<p>Policy DM52: Loss of employment land and floorspace</p>	<p>A. Subject to other policy requirements, the loss of employment floorspace to non-employment uses will only be permitted where it can be suitably demonstrated that:</p> <p>a. The site is no longer suitable or viable for its existing or an alternative business or industrial use; and</p> <p>b. An open and recent marketing campaign, covering of a minimum continuous period of 3 years, has been undertaken without success;</p> <p>or</p> <p>c. A change of use is required to enable site redevelopment as part of a strategically coordinated regeneration scheme or programme, with demonstrable wider community benefits that outweigh those of retaining the land exclusively for industrial and business use.</p> <p>d. Where the Council is satisfied that the loss of industrial or business floorspace is acceptable, it will require that new development proposals:</p> <p>e. Fully investigate the potential for incorporating strategic community infrastructure and other community facilities within the scheme, where appropriate; and</p>	<p>Object</p> <p>Object to two elements of this draft policy B and C. The draft Policy is unsound, as it is unjustified and is not consistent with national policy.</p> <p>Draft Policy DM52b) – there is no evidence to suggest why a three year marketing campaign is required. It is typical in other London boroughs to exercise periods of 12months. Paragraph 22 resists the long term protection of sites, where there is no reasonable prospect of the site being used for that purpose, having consideration to market signals and relative need for different land uses.</p> <p>Draft Policy DM52c) should remove reference to ‘as part of a strategically coordinated regeneration scheme or programme’. This infers that the site should be allocated to even be considered for loss of employment. This should not be the case. As emphasised in the housing policies above, windfall sites will help to the borough to meet and exceed its challenging housing delivery targets. An onerous policy requirement such as this would predicate any redundant employment windfall site being brought forward for housing.</p>

	<p>f. Make a financial contribution towards employment regeneration projects, training schemes, job brokerage services or business support initiatives, in line with Local Plan Policy SP9.</p>	
<p>Para 5.3 and Policy DM53: Development within town centres</p>	<p>The aim of this policy is to focus town centre uses within recognised town centres.</p> <p>This will enable a mix of commercial and other uses and provide vitality and vibrancy to the centres. The health of town centres depends upon the convenience of a range of shops and other uses being co-located. Town centre uses outside these locations could adversely impact the growth of existing centres and these impacts should be thoroughly assessed before planning permission is considered. In smaller parades, the aim is to retain shops (A1 Use Class) in order to protect the existing local shopping and ensure the on-going provision of an adequate range of shops that meet the daily needs of the local community.</p>	<p>Suggest</p> <p>Suggest that the policy aim is tweaked to consider the important supporting role housing can play in sustaining vibrant and vital town centres, in light of changing shopping habits, references Outer London Commission third report and Experian consumer expenditure report.</p>