

## **Policy DM58: Managing the Provision of Community Infrastructure**

### **Response to Haringey's Local Plan Preferred Options: Development Management Policies**

#### **Policy DM58**

#### **1. Introduction**

- 1.1 This response relates to Policy DM58: Managing the provision of Community Infrastructure
- 1.2 We have considered the policy with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework. Policy DM58 is not sound.
- 1.3 The proposed policy protects community facilities for unjustified reasons therefore contradicting the Frameworks aims of promoting sustainable development. This is therefore contributing to negative planning. The Framework provides no justification for protection of unviable community facilities.

#### **2. The policy is not positively prepared, justified, effective or consistent with the Framework.**

- 2.1 The policy will restrict growth. The Framework “foreword” confirms that sustainable development is about positive growth, making economic, environmental and social progress for this and future generations.
- 2.2 Public houses should be removed from the definition of community facilities. The Framework does not include public houses as a community facility.
- 2.3 The proposed policy is overly protective and not justified or positive in its approach. This is contrary to para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.
- 2.4 Thus the policy is inconsistent with para 19 and 21 of the Framework. Para 19 states:

*Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*

Para 21 states:

*Investment in business should not be over-burdened by the combined requirements of planning policy expectations.*

- 2.5 Furthermore the policy requires evidence to be produced which shows the facility is no longer required in its current use, the loss would not result in a shortfall in provision of that use and there is no demand for any other suitable community use on that site. This is substantially more prescriptive than the test in para 21 “*Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstance*”.
- 2.6 No consideration is given to the achievement of sustainable development as required throughout the Framework.
- 2.7 No consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability.

- 2.8 It is considered that 12 months is highly restrictive in the current economic climate. It is unfeasible and unreasonable to expect a developer to wait for a year for the chance to develop. This is contained within the policy to stop developers even trying to develop. As a result, the inclusion of this hurdle will in fact reduce the viability for the developer and thus contradict the NPPF, which seeks to promote sustainable development. Further to this, the inclusion of this line could prevent a deteriorating unviable facility to be developed to the benefit of the local community.
- 2.9 No consideration is given to the viability of the community facility. The policy outlines that consideration will be made if the facility is “*no longer required*”. This is considered vague and does not effectively outline parameters of exception. It is considered that Policy DM58 would support the retention of an unviable community facility.
- 2.10 We have demonstrated above that the policy is not consistent with national planning policy.
- 2.11 The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. The policy potentially stifles economic development and is not consistent with the policy framework.

### **3. Soundness – summary**

- 3.1 The proposed policy is considered unsound and fails to meet the four tests of the Framework. It is not positively prepared; justified; effective; or consistent with national planning policy. The policy should therefore be deleted.
- 3.2 We reserve the right to expand on, and provide evidence to support the points raised above at any examination in public.