Draft Sites and Policies Development Plan Document (DPD)

Name: Pamela Reid
Company: Goldcrest Land Plc
Phone Number: 0207 348 6674

DM R5: Food and drink / leisure and entertainment uses
Protection of Public Houses

Public Houses are linked with anti-social behaviour and detract from the ability to adopt healthy lifestyles. Therefore the use of public houses should not be protected.

Many also struggle with viability issues therefore if a public house is successful, it will be a viable business and will not face competing pressure for alternative uses hence no further protection is required.

DM H2 Housing Mix

The Housing mix suggested will not be suitable for all developments, especially sites with good access that can be more sustainable by accommodating a higher density of development and therefore more studio and 1 bedroom units will be required on such sites.

Provision should also be made for other specialist accommodation such as hostels, student residences and houses of multiple occupation.

DM C1 Community Facilities
Loss of Community Facilities

The requirement to undertake 30 months marketing for community uses will mean that premises for which there is no demand will remain vacant for 2 and a half years, providing no benefit to the community or the borough. In addition, if the property is proven not to have demand then it will take another 1-3 years for redevelopment meaning a valuable resource is not put to use for potentially 5 years.

DM E2 Offices in Town and Local Centres

The requiring a marketing time frame of 30 months for office units will leave vacant office space for a

The requirement to undertake 30 months marketing for office uses in town centres will mean that premises for which there is no demand will remain vacant for 2 and a half years, providing no benefit to the community or the borough. In addition, if the property is proven not to have demand then it will take another 1-3 years for redevelopment meaning a valuable resource is not put to use for potentially 5 years. Vacant office buildings will detract from the vitality of town and local centres in sustainable locations where alternative uses could be implemented. Imposing an unnecessary void period such as
this fails to address worklessness and regeneration in the borough and fails to take advantage of opportunities as they arise.

(Note: there is a spelling mistake on paragraph 4.26 ‘loosing’ is not a word, it should be spelt ‘losing’)

**DM E3 Protection of Scattered Employment Sites**

A marketing period of 30 months will leave units vacant for 2.5 years which will provide no benefit to the community or the borough. In addition, if the property is proven not to have demand then it will take another 1-3 years for redevelopment meaning a valuable resource is not put to use for potentially 5 years. Imposing an unnecessary void period such as this fails to address worklessness and regeneration in the borough and fails to take advantage of opportunities as they arise.

Particularly for scattered employment sites the council should take into account vacancy rates in the surrounding area in order to determine whether or not the ‘scattered’ employment site is in an appropriate location for its use.