


Ref: (for official use only)	Local Plan Publication Stage Response Form	
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Name of the DPD to which this representation relates:

Site Allocations DPD

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

	1. Personal Details ¹	2. Agent's Details
Title	Mr	Ms
First Name	Ross	Paula
Last Name	Burns	Stratford
Job Title (where relevant)		
Organisation (where relevant)	LaSalle Investment Management	Montagu Evans
Address Line 1	c/o Agent	5 Bolton Street
Address Line 2		
Address Line 3		London
Post Code		W1J 8BA
Telephone Number		020 7866 8609
Email address		Paula.stratford@montagu-evans.co.uk

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="SA3"/>	Policies Map	<input type="text" value="Fig 1.9"/>
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4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes <input type="text"/>	No <input type="text" value="✓"/>
4.(2) Sound	Yes <input type="text"/>	No <input type="text" value="✓"/>
4.(3) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input type="text" value="✓"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Montagu Evans act on behalf of La Salle Investment Management, the fund managers for Coal Pensions Property Ltd, the freehold owners of the Arena Shopping Park. We consider that the draft Site Allocations Development Plan document is "unsound" on the basis that it proposes to exclude the Arena Shopping Park from the Green Lanes District Centre.

Site Description

Arena Shopping Park is located towards the southern end of Green Lanes district centre with a Sainsbury's supermarket and a McDonald's restaurant located adjacent to the shopping park with vehicular access from Williamson Road. Green Lanes District Centre is a long established shopping street, comprising a number of restaurants, cafes, takeaways and convenience shops reflecting the diverse community which reside in the area. The shopping park has good public transport accessibility with Green Lanes overground station located immediately to the north of the shopping park. Manor House underground station is located approximately 500 metres to the south of the shopping park and there are also substantial bus routes passing along Green Lanes and well situated bus stops located close to shopping park. The shopping park has a very good level of accessibility with a PTAL rating of 6, the highest ranking of public transport accessibility.

The shopping park provides an important contribution to the district centre with a diverse retail offer, including the recent opening of TK Maxx in the former Royal Mail unit. The majority of the shopping park benefits from unrestricted open A1 retail use together with complementary cafés and a health and fitness use on the first floor. It is considered that the nature and composition of the shopping park together with this prominent location in Green

Lanes provides a robust case for Arena Shopping Park to remain within the designated Green Lanes District Centre.

Policy Background

The boundary of Green Lanes District Centre was amended to include the Arena Shopping Park within the defined district centre in the Haringey Unitary Development Plan (UDP) which was adopted in July 2006. The UDP recognised that opportunities to accommodate additional retail provision in the district centre was limited to small in-fill, however the inclusion of Arena Shopping Park into the district centre offered an opportunity for greater diversity in terms of retail offer. Arena Shopping Park is also defined within Green Lanes district centre in the Haringey's Local Plan: Strategic Policies (formerly Core Strategy) 2012.

We note that Policy SP10: Town Centres seeks to promote and encourage the development of retail, office, community, leisure, entertainment and cultural uses in district centres the council continues to support the importance of having service centres to meet peoples day to day needs and that the council take a proactive approach to reinvigorating the town centres, widening their offer, developing their identities, improving the public realm and accessibility to the shopping park. In relation to retailing in Green Lanes District Centre Policy SP10 acknowledges that the centre includes the Arena Shopping Park, which is a more recent addition and that the centre provides for a diverse community, with the bulk of national multiple outlets located in the Arena Shopping Park.

The National Planning Policy Framework (NPPF) March 2012 provides guidance from central Government in respect of, inter alia, the preparation of local plans.

Paragraph 157 states that local plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework;
- be drawn up over an appropriate timescale, preferably a 15 year timeline, to take account of longer requirements, and be kept up to date.
- be based on cooperation of neighbouring authorities, public, voluntary and private sector organisations.
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale and quantum of development where appropriate.

With regard to business needs Paragraph 160 states that local planning authorities should have a clear understanding of business needs within the economic market operating within and across the area. To achieve this they should;

- prepare and maintain a robust case to understand both the existing business needs and likely changes to the market;
- work closely with business communities to understand the changing needs and identify and adjust barriers to investment, including lack of housing, infrastructure or viability.

Paragraph 161 states that local planning authorities should use an evidence base to assess, inter alia, the capacity of existing centres to accommodate new town centre development and the need for floorspace for economic development for all foreseeable types of economic activity over the plan period including full retail and leisure development.

Planning Case for Arena Shopping Park to remain within Green Lanes District Centre

We consider that the Arena Shopping Park provides a positive contribution to Green Lanes District Centre and to exclude it from the designated district centre boundary could restrict and stifle future development in terms of changing retailer representation which we consider would be contrary to the NPPF

We consider that this is of even greater significance given the size and importance of Arena Shopping Park in the context of Green Lanes District Centre. Potentially stifling sustainable economic development from such a large part of the district centre could in turn have a detrimental effect on sustainable economic development across the whole of the district centre. Moreover we note that the Council has long term aspirations for comprehensive redevelopment of the site and wider area to deliver additional housing in the Borough and consider that removing Arena Shopping Centre from the district centre designation will reduce the ability to attract retail to this area and consequently hinder the ability to develop future redevelopment options for the site, (including high density residential use) which is likely to be supported by retail development.

We note that it is the Council's intention to extend the length of Green Lanes District Centre further to the south to provide scope for a more linear frontage and to develop more high street shops. However, we do not consider retaining Arena Shopping Park within the district centre boundary will prevent retail development of the high street further south in a linear form.

It is considered that the proposed removal of the shopping park from the designated district centre could have detrimental long-term impacts on the ability to continue to diversify the retail offer which may change over time subject to tenant demand and change in retailer representation.

On the basis of the above we do not consider that there are any sound planning reasons given the highly sustainable location, unrestricted A1 retail use of the park and potential for future redevelopment opportunities that the shopping park should be excluded from the defined Green Lanes District Centre.

In light of the above evidence we are of the view that the boundary of Green Lanes District Centre is amended to include Arena Shopping Park as identified on the attached plan.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Retention of Arena Shopping Park within Green Lanes District Centre as identified on the attached plan.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Due to the large scale and importance of Arena Shopping Park within Green Lanes District Centre and the contribution that the shopping park makes towards the vitality and viability of the district centre.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature

Date:

2/3/2016