

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation 8th January – 4th March 2016

The Council is consulting on four Development Plan Documents (DPDs).

These are the:

- Alterations to the Strategic Policies;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the Word compatible version of this form which is available for downloading from the Council's website www.haringey.gov.uk/localplan.

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they should only relate to the 'tests of soundness' and legal compliance (see guidance note at the back of this form, in the DPDs appendices and on our website for more information).

Complete the form overleaf and return to:

Local Plan team
Level 6, River Park
House,
Wood Green
London
N22 8HQ

Or by email to:

ldf@haringey.gov.uk

Or complete it online at:


www.haringey.gov.uk/localplan

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4th March 2016**.

Next Steps

In the summer of 2016 the Planning Inspector will hold an "Examination in Public" to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

For further information please visit www.haringey.gov.uk/localplan or email ldf@haringey.gov.uk

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

**The Site Allocations Development
Plan Document**

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	<input type="text" value="Mr"/>
First Name	<input type="text" value="Paul"/>
Last Name	<input type="text" value="Woods"/>
Job Title (where relevant)	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="GL Hearn Limited"/>
Address Line 1	<input type="text" value="75 Wells Street"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text" value="London"/>
Post Code	<input type="text" value="W1T 3QH"/>
Telephone Number	<input type="text" value="020 7580 5886"/>
Email address	<input type="text" value="Paul.Woods@glhearn.com"/>

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	SA11	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (tick):

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

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.

Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.

The proposals in respect of the Wood Green Library site location incorporate a significant area of land that is in the ownership of C&R. Our client is currently in discussions with the Council to bring forward development to facilitate provision of a national brand food retailer within the Mall to be served by a surface level car park making use of the former petrol filling station site on the corner of Mayes Road and Caxton Road. These proposals will provide for much improved public realm in this location with enhanced pedestrian route to the frontage of the site along Caxton Road and improvement and active frontage to the Mall along Mayes Road. The proposals have also been designed to allow for longer term residential development above what will the surface level car park to serve the new food store.

The Council's development aspirations for the site allocation are set within the policy including site requirements and development guidelines. Delivery of these aspirations would rely on the involvement of a number of landowners across a range of different land uses. Some sites are identified for substantial new development, whilst others would provide the public spaces, infrastructure and facilities that are necessary to facilitate it. There is no detail of how delivery of these aspirations would be coordinated or financed in a comprehensive and equitable way and we recommend that consideration needs to be given to these aspects.

Having regard to the different site ownerships and our client's current development proposals noted above, we consider that the potential for phasing of development to realise the Council's objectives should be recognised in the policy. Without such a reference, the policy is unlikely to be effective in delivering the site allocation and is unsound on this basis.

We also consider that the reference to restriction on height at bullet point two under Development Guidelines may serve to unnecessarily restrict the development potential of the site in this location. Height is a relative term and whilst development will need to respect the amenity of nearby residential properties, appropriate height and relationship to adjoining sites will be a matter for detailed design and testing. We therefore consider that the policy is not effective in this regard and unsound on this basis.

(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.

We would recommend that the second bullet point under Development Guidelines should be reworded as follows:

"Development on parts of the site directly opposite residential buildings on Caxton and Mayes Road should respect their residential amenity"

We would also recommend that a further bullet point is added under development guidelines as follows:

"Having regard to the different ownerships across the site, consideration will be given to phasing of development which contributes to the overall site allocation objectives as development site opportunities come forward".

(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

As owner of the Mall Shopping Centre in Wood Green, Capita and Regional is a major landowner in Wood Green and therefore a key stakeholder in plans to bring forward development. Our representations raise important policy issues which we would wish to discuss at the oral examination.

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

Paul Woods

Date:

04/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	SA12	Policies Map	<input type="text"/>
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11. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes No

Please tick as appropriate

12. 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.

Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development.

The draft allocation for the Mall notes that buildings will be retained for their current uses over the plan period but with opportunities to make the site less dominant by improving the public realm around the site. It is also noted that a new legible east-west link should be created to the north.

C&R is committed to continually improve the visitor experience of The Mall and this includes the public realm adjacent to the shopping areas. Such improvements are important in attracting high quality occupiers and help the centre compete against other retail destinations beyond Haringey. However, this also needs to be viewed in the context of the development opportunities identified in respect of SA11 and the potential for a comprehensive regeneration of the wider environment. The policy needs to recognise the changing context of town centres in the face of competition from online retailers and the increase in residential uses in town centre locations. There is a growing emphasis on leisure uses in town centres, which serve to complement and support the retail offer. The policy should reflect this and also provide for further complementary uses such as residential and hotel as part of the retail offer. In this regard, the Council will be aware that planning permission has recently been granted for

conversion of existing office space at Alexandra Court on High Road to hotel. Meanwhile, additional residential use in town centres increases vitality and viability making a town centre more vibrant and offers opportunities to combine leisure and retail and expand the evening and night time economy, to the overall benefit of the town centre's health.

This opportunity for complementary uses is recognised by the NPPF at paragraph 23 under the heading ensuring the vitality of town centres. Paragraph 23 notes that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In doing so, it is noted that local planning authorities should, inter alia, allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.

We therefore consider that the policy as currently drafted is unsound in that it is inconsistent with national policy guidance and is not flexible enough to allow for a suitable range of complementary town centre uses.

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

13. 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.

Having regard to this national policy context, we consider that the opportunity for other complementary uses at The Mall should be recognised. We would therefore recommend that paragraph 2.37 under site commentary is amended as follows:

“Opportunities to improve the public realm around this building will be supported. Additional retail and complementary town centre uses such as leisure and hotel use, as well as the potential for residential use, will be supported on the developable part of the site and where appropriate through limited infill developments and change of use that benefit the Metropolitan Centre overall.”

(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.

14. 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

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

As owner of the Mall Shopping Centre in Wood Green, Capita and Regional is a major

landowner in Wood Green and therefore a key stakeholder in plans to bring forward development. Our representations raise important policy issues which we would wish to discuss at the oral examination.

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.

16. Signature	<i>Paul Woods</i>	Date:	04/03/2016
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Making a Representation: Guidance Note Haringey's Local Plan Pre-Submission Consultation 8th January – 4th March 2016

The Local Plan documents have been through a number of stages of consultation. The outcomes of each stage of consultation have in turn informed the next stage of development of the documents. The current stage of consultation offers the final opportunity to comment on the draft documents before it is submitted to the Planning Inspector for Independent Examination.

The previous stages of consultation offered wide opportunity to contribute to the development of the policy documents. As the final drafts, any comments made on the documents at this stage may not result in a change but will be recorded and considered alongside the documents at Examination. This will mean that all comments and representations will be made public. This will be the last stage to comment on the Local Plan documents unless requested by the Inspector.

How to respond to Local Plan documents at this stage?

If you seek a change to any of the document your comments should state clearly what you want changed and why, and you should provide evidence to support these proposals. You should provide wording, where relevant, for the changes proposed.

The documents should be consistent with national and regional policy. If you think this is not the case you should state clearly the reasons why. If you feel that an additional policy should be included in the Local Plan documents, which go against national or regional policy, in order to meet a clearly identified and justified local need, you should state what the local circumstances are and provide supporting evidence.

If you think another policy should be included please ensure the issues are not already addressed in:

- national or regional policy; or
- in the other Local Plan documents.

If the issues are not addressed elsewhere, please state why your suggested policy should be included in the specified Local Plan document and what it should say.

The Local Plan documents must meet two key criteria before it can be submitted and adopted. During Examination the Planning Inspector will only consider comments which refer to these criteria. Therefore, when making representations please keep in mind the following:

Has the Local Plan documents met the following legal requirements?

Has it been prepared in accordance with the Local Development Scheme, which sets out the work programme for the Local Plan?

Is it in compliance with the Statement of Community Involvement, which sets out how the Council will involve the community in the preparation of planning documents and in considering planning applications?

Has it been subject to a Sustainability Appraisal to examine the social, economic and environmental impacts of the policies?

Does it have regard to national policy?

Are the Local Plan documents sound?

- Is the document justified?
 - Is it based on robust and credible evidence?
 - Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
 - Is it deliverable?
 - Is it flexible?
 - Will it be able to be monitored?
- Is it consistent with national policy?

Does it conform generally with regional policy as set out in the London Plan?

Is it in line with the objectives set out in Haringey's Sustainable Community Strategy?

Further detailed guidance on how to respond to the documents can be found in the appendices of each document.

Please note that all responses received will be made publically available.

All responses must be received by **5pm 4th March 2016**