

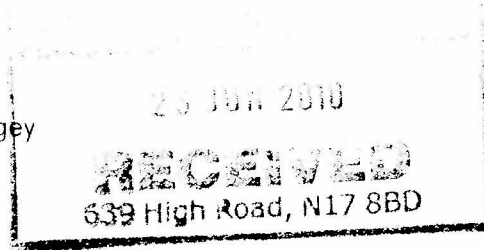


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21 June 2010

Dear Sir/Madam,

## HARINGEY CORE STRATEGY: PROPOSED SUBMISSION STATEMENT

### Introduction

CB Richard Ellis (CBRE) is instructed by Hermes Real Estate Investment Ltd (HREIM) acting as agent for the Trustees of the BT Pension Scheme (BTPS) to submit representations to the Core Strategy. BTPS have been involved in the consultation process for the current initiatives for the modified Tottenham Hale Gyratory and have also submitted representations to Haringey Council's Transforming Tottenham Hale Document and Transport for London's Improving Tottenham Hale document.

### Background

Our client is a key stakeholder in the area, owning the freeholds to Ferry Island (FIRP) and Tottenham Hale Retail Parks (THRP).

Tottenham Hale Retail Park is located on the corner of Ferry Lane and Broad Lane. The Park comprises approximately 20,000 sq m of retail floorspace. There is a strong line up of retail occupiers on site including B&Q, Asda Living, Lidl and Currys. All of the units are let with the exception of a c. 112 sq m unit which demonstrates the popularity and success of the Park even in these challenging times.

Ferry Island Retail Park occupies the island site to the north of The Hale and south of Station Road. The site comprises a retail unit (Maplin), restaurant (Pizza Hut), drive-thru (KFC) and associated parking.

The retail parks both benefit from open A1 Permissions.

The retail parks are a popular retail destination for tenants and customers and our client welcomes the Council's recognition of their importance (Paragraphs 5.3.53 and 5.3.54). BTPS also welcome the promotion of the local area for redevelopment and for there to be greater integration with the Tottenham Hale transport interchange.



This letter should be read in conjunction with our response to the Site Allocations Development Plan Document (a copy of which is attached) and previous representations (Haringey Council's Transforming Tottenham Hale Document and Transport for London's Improving Tottenham Hale document).

### Representations to the Haringey Core Strategy Proposed Submission document

We have not previously submitted representations to the Core Strategy document and therefore submit some general observations which are set out below.

However, given the advanced nature of the Proposed Submission document we also provide our commentary on the issues of soundness relating to Policy SP10.

### Chapter 3

Paragraph 3.1.10 portrays the Tottenham Hale area as an unwelcoming and traffic dominated environment characterised by underused and vacant sites. Whilst we agree with this assessment in general, it should be recognised that both FIRP and THRP have attracted considerable investment to the area and improved the level of footfall. The contribution of retail to the area should be recognised along with recognition that retail is an appropriate use for these locations which can stimulate growth and create activity.

We agree that the area does fail to capitalise on its many advantages and the existing gyratory creates a hazardous environment for pedestrians and cyclists which does not encourage the integration of the retail parks with the wider area.

The aspiration to return the gyratory to two-way traffic is also welcomed. Indeed, the TFL document (Improving Tottenham Hale: Consultation Response) encourages wider pedestrian and cycle crossings which we support. However, we remain concerned about the proposals to change the access and egress arrangements for FIRP and THRP. We hope that the proposals are carefully managed and bring significant improvement to vehicular flows and reduce traffic impact.

A new high quality station square and public transport interchange should be actively promoted by the Council but we also seek improved linkages between the station and the retail parks which would encourage more sustainable pedestrian movement.

Paragraph 3.1.14 refers to the facilitation of a significant residential-led development on the existing island site. We require clarification that this is the Ferry Island site which is partially occupied by FIRP. Whilst we agree that the wider island site is in need of redevelopment, the proposals would include the entirety of the FIRP which serves an important retail function and had undergone significant upgrade. We are therefore keen to understand the proposals in more detail and the ranges of uses proposed. The objective should be to bring forward a comprehensive planned initiative incorporating both FIRP and THRP.

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## Chapter 5

### Policy SP10

We note the identification of further convenience and comparison retail capacity in the borough. Whilst we support the distribution of retail growth to priority centres including Wood Green Metropolitan Centre and the five District Town Centres, this Policy should recognise the role of THRP and FIRP as retail destinations (with a mixed use element) which are complementary to the growth of the borough's existing centres.

The Council, through the Core Strategy, should promote the designation of Tottenham Hale Urban Centre as a future District Centre which incorporates both FIRP and THRP.

### Supporting text

Paragraph 5.3.6 establishes the retail hierarchy of town centres within the borough in more detail. Although the role of THRP is recognised later in the Chapter, neither the Tottenham Hale area nor THRP are considered within the hierarchy of centres. Given Tottenham Hale's excellent transport links and connectivity and substantial retail offering at THRP and FIRP, Policy SP10 should recognise the role and function of Tottenham Hale as an accessible, established and successful retail centre. We welcome the supporting text's (Paragraph 5.3.9) recognition of a potential new retail centre being proposed as part of the Tottenham Hale Urban Centre Masterplan SPD and support the promotion of Tottenham Hale as a retail site.

We welcome the opportunity THRP provides in terms of supporting the regeneration of the Tottenham Hale area. We also agree that the site offers an opportunity to expand the retail offer in the area (Paragraph 5.3.53).

Paragraph 5.3.53 refers to the 'impact' of THRP on shopping provision. We seek clarification as to what the meaning of 'impact' is in this context and whether it will be positive or negative. As an established retail location, development proposed for the site would have addressed planning policy guidance which sought to protect the borough's town centres (PPG6, PPS6). As such, the impact resulting from the existing Retail Parks would have been considered acceptable. Furthermore, THRP and FIRP both benefit from open A1 planning permissions which encourage a greater flexibility of retail offer.

We would argue that mixed use development including retail, office, community, leisure and entertainment uses would positively contribute to the economic regeneration of the wider area.

We seek clarification on the level of floorspace proposed and types of occupiers sought. We are concerned that, unless properly planned, the proposals will jeopardise the existing operations and be replaced by uses which are to the detriment of the vitality and viability of the existing retail function. Whilst we support increased retail floorspace and greater intensification through housing and office development this must not compromise the operations of FIRP and THRP.



## Issues of Soundness

### Justified

PPS12 provides that to be 'justified' a DPD needs to be:

*"Founded on a robust and credible evidence base involving:*

- *Evidence of participation of the local community and others having a stake in the area*
- *Research/fact finding – the choices made in the plan are backed up by facts*

*The most appropriate strategy when considered against reasonable alternatives. "*

### Evidence base

Policy SP10 states:

*"The Council will promote the distribution of retail growth to meet the required additional 13,800 sqm gross comparison goods floorspace and an additional 10,194 sqm net convenience goods floorspace by 2016"*

We understand the assumption on 'need' is based upon the conclusions of the borough's Retail Study 2008.

Since the retail study was undertaken, the economic climate has changed significantly and it may be appropriate to re-assess the capacity findings as the evidence base could be over 2 and a half years old by the time the Core Strategy is adopted.

Otherwise we do not question the soundness of the evidence base or evidence of participation with the local community.

### Appropriate strategy

Policy SP10 of the adopted Core Strategy states:

*"The majority of this additional retail growth will be met in Wood Green Metropolitan Centre and the five District Town Centres."*

We consider that the local planning authority should have regard to relevant policies in PPS4 when preparing the Core Strategy.

PPS4 requires Local Planning Authorities to identify an appropriate range of sites to accommodate the identified need. Policy EC5.5 states:

*"Having identified sites for development, local planning authorities should allocate sufficient sites in development plan documents to meet at least the first five years identified need. Where appropriate, local development frameworks should set out policies for the phasing and release of allocated sites to*

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ensure that those sites in preferred locations within centre are developed ahead of less centre locations."

In identifying sites to accommodate the identified need, Policy EC5 states Local Planning Authorities should:

- a. Base their approach on the identified need for development.
- b. Identify the appropriate scale of development, ensuring that the scale of the sites identified and the level of travel they generate, are in keeping with the role and function of the centre within the hierarchy of centres and the catchment served.
- c. Apply the sequential approach to site selection.
- d. Assess the impact of sites on existing centres.
- e. Consider the degree to which other considerations such as any physical regeneration benefits of development on previously-developed sites, employment opportunities, increased investment in an area or social inclusion, may be material to the choice of appropriate locations for development. "

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454

The Policy is not sound because it does not specify sufficient development sites to accommodate the identified need nor does it appear to identify the quantum of floorspace the existing centres could accommodate over the next 5 to 10 years.

Given the Tottenham Hale Masterplan area's (incorporating THRP and FIRP) excellent transport links, plans to improve the gyratory and existing comprehensive and varied retail provision, we consider that this area should be considered by Policy SP10 as an area which can accommodate the additional growth in retail floorspace up to 2016.

The inclusion of FIRP and THRP as suitable retail sites would make Policy SP10 both appropriate and effective. We therefore conclude the Core Strategy is not sound without due consideration of the Tottenham Hale Masterplan area.

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### Summary

BTPS are supportive of the Core Strategy's aims and its recognition of the need to redevelop the Tottenham Hale area, including improvement works to the transport interchange, revising the road layout and the intention to improve linkages between the interchange and THRP and FIRP.

458

We understand that THRP and FIRP will form part of the masterplan to provide residential led development. We are broadly supportive of the intensification of the sites particularly if it is well integrated. However, we are concerned that, as drafted, the Core Strategy does not provide sufficient assurance that the redevelopment of Tottenham Hale will not compromise or be to the detriment of existing established operations.

461  
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We note that the Core Strategy is silent on the status of Tottenham Hale within the retail hierarchy. Given its excellent transport links, accessibility and comprehensive retail provision, we consider the Policy and supporting text should be explicit in its support of the role of Tottenham Hale as a new District Centre which incorporates both THRP and FIRP. This area should be acknowledged by policy as a priority.

462  
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This area should be acknowledged by policy as a priority Whilst we have not focussed on the document's legal compliance, we have made general commentary on area of the document which could be improved and questioned the soundness of Policy SP10.

I look forward to receiving confirmation that the representations on Haringey Council's Core Strategy Proposed Submission document have been received and duly made. We would welcome feedback and discussion regarding our comments.

Yours faithfully



Will Avery  
PLANNER – PLANNING

cc: Paul Wray – Hermes Real Estate  
Sarah O'Brien – DTZ  
Nick Diment - CB Richard Ellis

