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8 Spicer Street, St. ALBANS
Hertfordshire AL3 4PQ
t : 01727 838455
f : 01727 835047
e: michael.fearn@shire-uk.com

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Our Ref: P-07-289/Haringey

Planning Policy
Freepost LON11863
London Borough of Haringey
639 High Road
Tottenham
LONDON N17 8BD

10 37 + 39

Dear Sirs

**PLANNING & COMPULSORY PURCHASE ACT 2004
Local Development Framework for Haringey
Core Strategy Proposed Submission Consultation - May 2010.**

1. Introduction & Background

We act as planning consultants for Barclays Bank plc ("the Bank") in respect of the Local Development Framework (LDF) for Haringey and previously made representations on the Core Strategy Preferred Options in June 2009. As a long-established business, the Bank has made a substantial contribution to the vitality and viability of the District's centres over the years that it has traded and as a significant stakeholder within the Council's area it is therefore concerned that development plan policies should not fetter the important contribution that it makes to the vitality and viability of town centres. Through high attraction of footfall, financial services retailers generally, (and the Bank in particular) play a key role in promoting town centre health and as a result, the provision of financial services should be encouraged to improve and evolve alongside the improvements to shopping provision envisaged in the Council's strategy. It is likely that the Bank's representation within town centres will continue to evolve over the life of the LDF and such investment should be welcomed and facilitated by planning policy. On behalf of the Bank we have examined the Haringey Proposed Submission document together with other background documents and set out our representations below.

2. Points Arising from the Consultation Document

The Core Strategy Objectives include strengthening the role of Wood Green Metropolitan Town Centre and "responding to changing economic and retail demands". The strategy also seeks support for the promotion of Haringey's centres as successful and vibrant town centres "that will attract new businesses, jobs and homes during the life of the Core Strategy". Policy SP10 sets this out in a Core Policy, stating in particular that Wood Green Metropolitan Town Centre "will be the principal focus of growth accommodating an extensive range of the types of development" with the intention that Wood Green will become "a thriving and vibrant centre for north London". Paragraph 5.3.11 states "Shops and service uses (A1 and A2) are considered suitable for all town centres" and paragraph 5.3.15 refers to strategic policy in the London Plan intended to enhance the attractiveness of town centres.



We have previously pointed out that, unsupported by any evidence, saved UDP Policy TCR3 set arbitrary thresholds for the levels of non-A1 uses in designated frontages and that the policy did not differentiate between types of non-A1 use. In Paragraph 5.3.17 of the Core Strategy the Council states its intention to encourage proposals that add to the vibrancy of town centres yet the same paragraph intends that the primary and secondary frontages "will be retained and protected". No evidence is provided to indicate why the continuation of the outmoded UDP approach is considered necessary. Paragraph 5.3.18 makes reference to "blank facades" and paragraph 5.3.19 seeks to arbitrarily restrict non-A1 uses in designated frontages but, as the Bank's representations show, this approach is based upon an out-of-date misunderstanding of how modern financial services retailers such as the Bank operate. Banks are important contributors to town centres and significant attractors of visitation in their own right so their important role in underpinning town centres and assisting in regeneration should be acknowledged in all planning policies on the matter of promoting town centre vitality and viability.

If the Council intends to continue to make use of detailed development control policies such as defined frontages, the matter should be expressly addressed in the Core Strategy and in the evidence base in order to provide the policy direction for subsequent DPDs, however the Core Strategy simply continues the outdated UDP approach on this matter by confirming in Appendix 1 that saved UDP Policy TCR3 will be replaced by Policy DM17 in the Development Management DPD. The Core Strategy does not properly address the matter of the out-of-date frontage policy being carried forward from the UDP and whether there is any evidence to support the retention of such a policy. Development plans that are not "based upon a robust, credible evidence base" will be unsound (PPS12). The provision of evidence from an up-to-date retail assessment is vital but the 'Retail and Town Centres Study 2008' does not provide any evidence that would support a continuation of restrictive frontage policies. A review of any evidence about the effectiveness of such policies is fundamental to whether the Council's approach is sound but the Bank does not accept that continuing with an approach which seeks to severely restrict non-A1 uses will deliver the investment, vitality and viability that the Council states it is anxious to secure.

The production of the LDF provides an opportunity to examine and revise out-of-date planning policy. Indicators such as rents, yields and pedestrian flows change over time as new floorspace is added to town centres so if the Council intends to continue to make use of detailed development control policies such as defined frontages, the matter must be expressly addressed in the evidence base and set out in the policy direction of the Core Strategy in order to give a steer to subsequent DPDs.

The 2008 Retail Study did not consider the detail of designated shopping frontages and the policies that apply to them yet the Core Strategy is now setting the direction for retail policy without any review of that important element of the evidence. In our previous representations we expressed concern about this matter but it appears from the Submission version of the Core Strategy that those concerns have not been acknowledged or acted upon. That is now compounded by policies in the Development Management DPD (Consultation May 2010) to which we have made separate but similar representations.

- On the matter of policy formulation PPS12 (June 2008) is clear that all DPDs must be:
- "founded on a robust and credible evidence base; and
 - the most appropriate strategy when considered against the reasonable alternatives"; and must be
 - "consistent with National Policy"

The Council's intention to seek to attract private sector investment in town centres does not sit well with any continuation in LDF documents of previous policies seeking to limit certain



Part A uses in primary shopping frontages. The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as A2 detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are "shopping area uses" and are acceptable without any need for restriction or qualification. This is particularly the case for the financial services sector. ODPM Circular 03/2005 "Changes of Use of Buildings And Land" which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses "serving the public, from other office uses not directly serving the public" - paragraph 32), that the Class is also "designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying". The uses within Class A2 are noted as being those "which the public now expects to find in shopping areas" (paragraph 38). The wider role played by town centres than a pure shopping function is recognised throughout Government policy on town centres.

Government Policy in PPS6 has been replaced by the publication of PPS4 "Planning for Sustainable Economic Growth", although this continues the thrust of policy in PPG6 relating to town centres. Policy EC3.1c states that Planning Authorities should: "at the local level, define the extent of the centre and the primary shopping area in their Adopted Proposals Map", following consideration of whether there is evidence of a need to designate "realistically defined primary and secondary frontages in designated centres" [our underlining]. A strong emphasis upon the promotion of town centre vitality and viability remains in the new PPS and the Government is clear that there should be a positive attitude towards all development which generates wealth and creates employment. The "over-arching objective is sustainable economic growth" (paragraph 9). The Government wants town centres to offer "a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities". There should be "enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" (paragraph 10). Policy EC10.1 states that: "Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably". It is therefore important that local policies should facilitate this.

The Bank objects to the continuation of policies that restrict A2 uses as this is likely to work against the objectives of the Government and the Council to promote vitality and viability in town centres. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. The Bank therefore objects to the omission of any intention to review such policies, particularly as the Council has provided no evidence to justify their position and has not given consideration to reasonable alternative strategies.

Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. The Bank has undertaken a number of comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. These surveys have been key in helping to change the attitudes towards Class A2 and even planning authorities that once strongly resisted Class A2 uses in their primary areas have granted permission for Barclays 'flagship' outlets in the last 12 months. Examples of authorities which have recognised the wider benefits of the 'flagship' design (following receipt of applications which have been supported by evidence of high footfall), include Leicester, Manchester, Plymouth, Reading, Sheffield, Southampton, Kensington & Chelsea and Cambridge.

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Banks also have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly retail in its presentation and has recently introduced an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms as "a retail focused experience". The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and operation to retail shops. These are the "changing demands" to which the Core Strategy must respond, in accordance with its objectives.

Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that over 70% of the internal space at ground floor is accessible to customers. The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. It is therefore important that the Council recognises the benefit of A2 uses in fostering footfall and pedestrian activity and that planning policies should encourage flexibility to allow changes of use between the A1 and A2 use classes.

3. Closing Comments

The Council recognises the need for significant private sector investment in the town centre. The opportunity provided by the preparation of the main elements of the LDF should be used to reappraise out of date policies and give greater encouragement to 'appropriate' Part A uses to invest and to improve the quality of their representation. The Bank believes that there is no good planning reason to restrict the presence of Class A2 uses at ground floor level in any shopping frontages. Indeed there would be considerable benefit to shopping centres in seeking to attract A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages and who also foster very significant footfall and pedestrian activity. This can only assist in providing the confidence and commercial viability necessary for any programme of regeneration and investment.

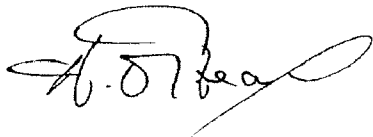
The Council should recognise the important contribution of financial service retailers such as banks in both bringing investment and acting as attractors for investment by others, in the wording and application of policies in all the relevant LDF documents. This will help to achieve the Core Strategy's strategic objectives of regeneration, physical change and increased economic activity. Planning policies should therefore encourage flexibility to allow appropriate changes of use between the A1 and A2 use classes. Pursuing restrictive policies to keep significant generators of footfall out of central shopping areas will actively work against the achievement of the Core Strategy's strategic objectives and is inconsistent with national policy. In fact there is nothing in Government policy that recommends or supports imposing an embargo upon acceptable town centre uses at all. The continuation of historic primary frontage policy is unjustified by any robust and credible evidence and the Council has provided no explanation for the decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives.

The Council's documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have even been considered at all. At present the Core Strategy approach to A2 retail uses is neither Justified nor Consistent with National Policy so the Bank therefore objects to the omission from the Core Strategy of any review of Policies that seek to restrict A2 uses.



In view of the requirement for improved provision of banking services in Haringey, the Bank would like to confirm its continued interest in the LDF process and in that regard we shall be grateful if the Council will continue to notify us of the progress of the submitted document as well as details of any other emerging LDDs.

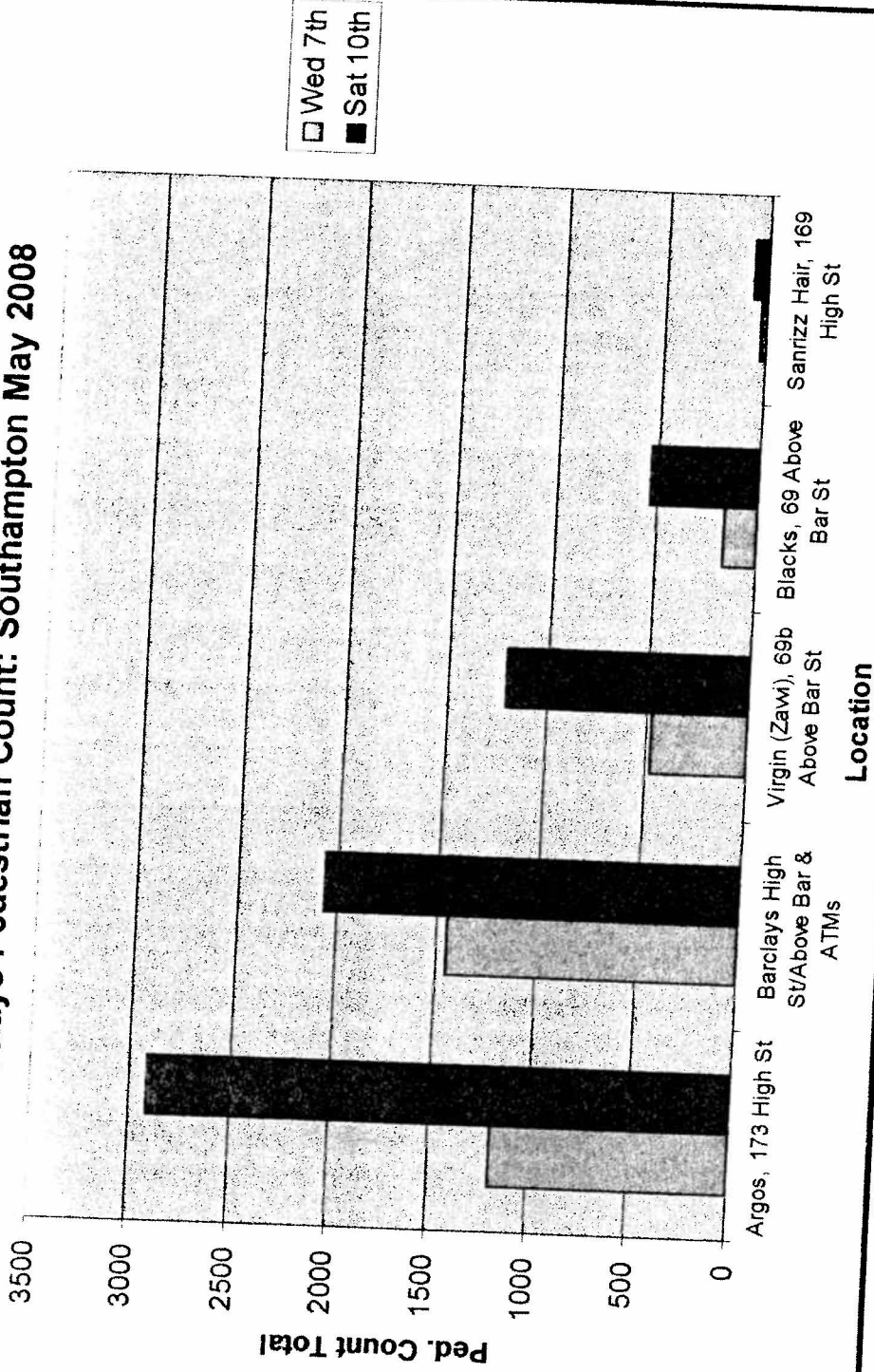
Yours faithfully



Michael Fearn of Shireconsulting
On behalf of BARCLAYS BANK PLC

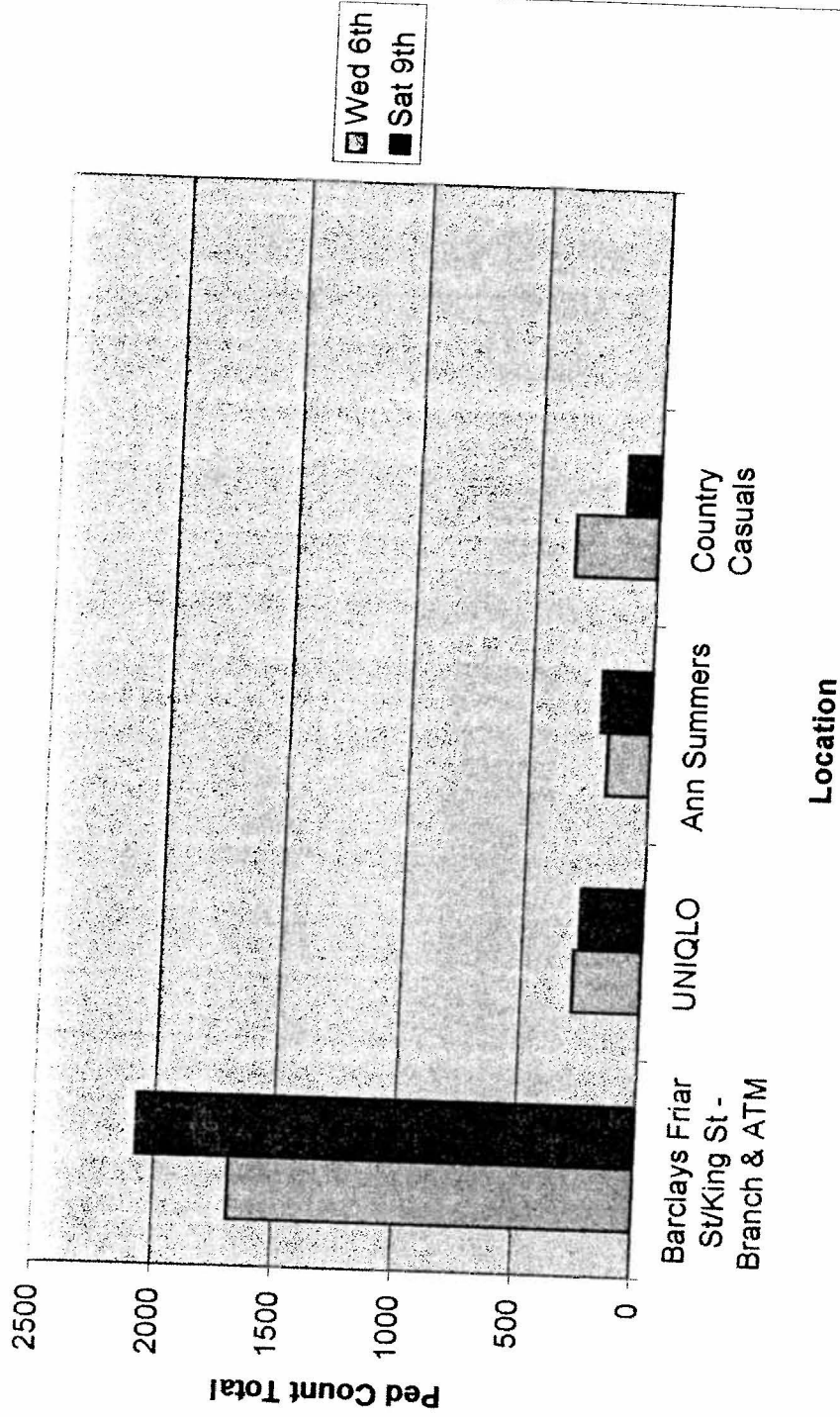


Barclays Pedestrian Count: Southampton May 2008



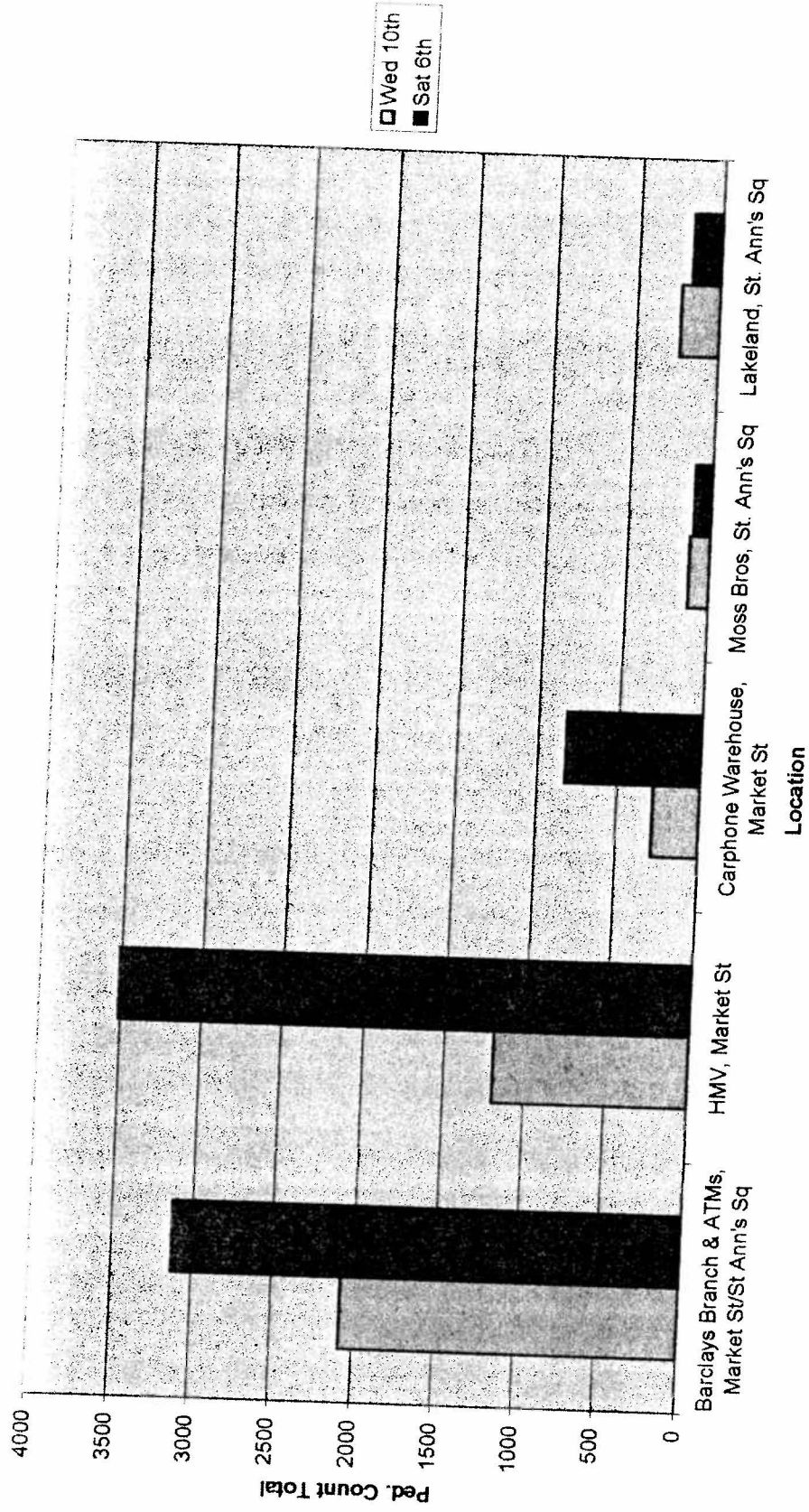


Barclays Pedestrian Counts: Reading, August 2008



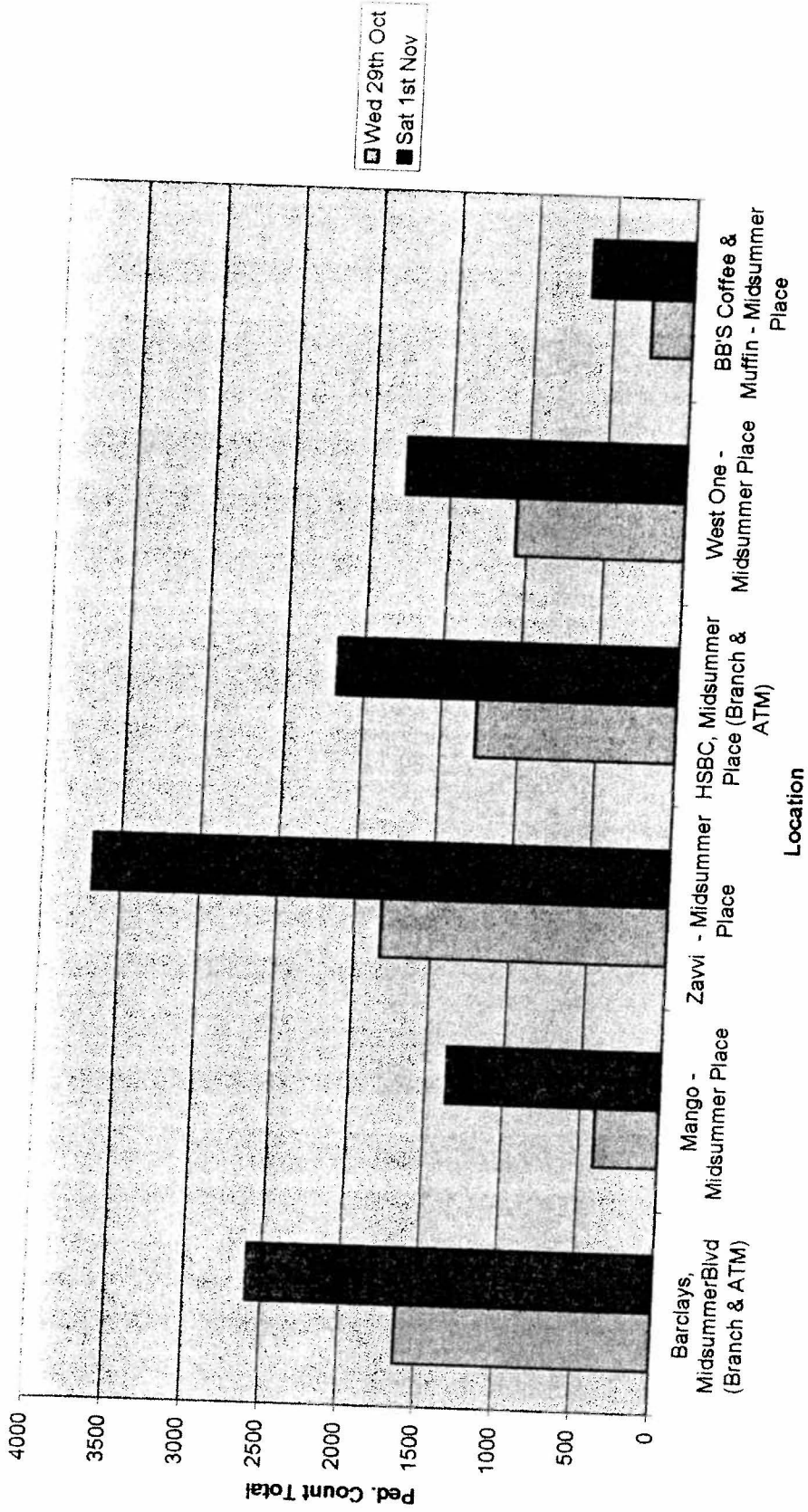


**Barclays Pedestrian Counts
Manchester (Sept 08)**



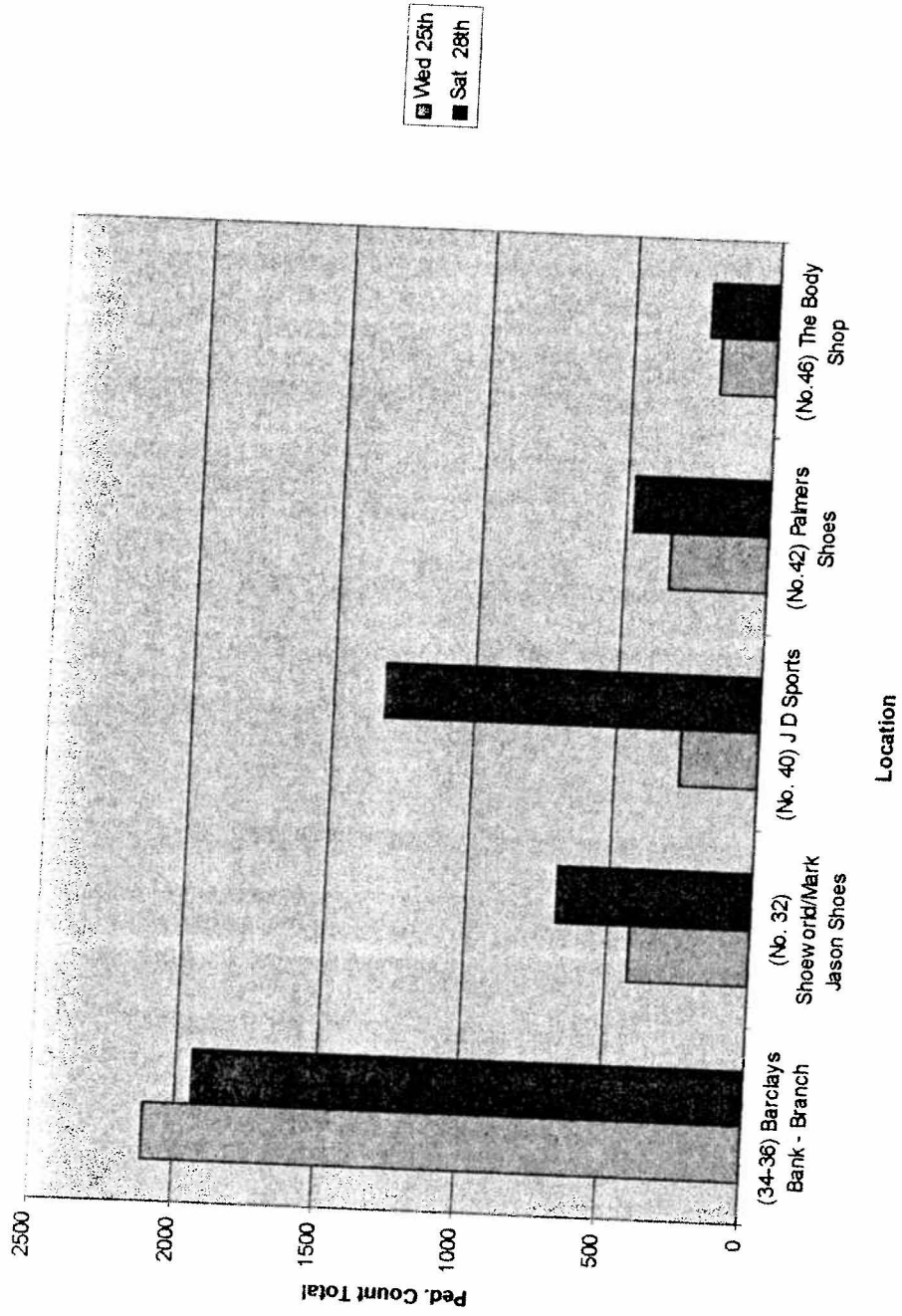


**Barclays Pedestrian Counts
Market Street, Milton Keynes (Oct 08)**





Barclays Pedestrian Counts: Romford, March 2009





Barclays Pedestrian Counts: Southend - April 2009

