

Haringey Council Planning Policy
Level 6
River Park House
Wood Green, N22 8HQ

13 January 2017

Our Ref: 16/2988

Dear Sir / Madam

**REPRESENTATION TO THE HARINGEY LOCAL PLAN MAIN MODIFICATIONS PUBLIC CONSULTATION –
DEVELOPMENT MANAGEMENT DPD DOCUMENT ON BEHALF OF POWER LEISURE BOOKMAKERS LTD**

Introduction

We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations to the Haringey Local Plan Main Modifications Public Consultation – Development Management DPD (hereafter referred to as the ‘Plan’). We welcome the modifications proposed by the inspector and comment individually on the modifications below.

Modification Reference: DM Mod93

This modification replaces the limited list of uses (A1-A4), identified as permissible within Primary Shopping Frontages of the Metropolitan and District Town Centres, with “appropriate town centres uses”. This modification is welcome and will ensure that town centre uses are not excluded from the borough’s Primary Shopping Frontages.

Modification Reference: DM Mod94-6

Modification DM Mod95 removes Part A (b) of Policy DM46 and therefore removes the 5% threshold policy that was proposed to limit the number of betting shops (including extant permissions). As discussed in our previous representations and Hearing Statement, this threshold figure was not justified by the council’s evidence base and therefore we welcome the more objective policy test included within Modification DM Mod96.

Modification Reference: DM Mod97

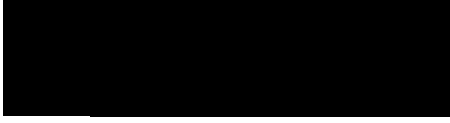
We welcome the proposed modification to the supporting text (Paragraph 6.55) which removes the statement that there is link between health outcomes and the proximity to betting shops. This was a statement that was contradicted by paragraph 6.2.54 of the council’s Health Evidence Base (2012) which made it clear that there has been very little empirical research into the apparent link.

We are pleased to see that our comments have been taken on board through the EiP Hearing process. The proposed modifications provide clarity that betting shops are considered appropriate within the Primary Shopping Frontages of the Metropolitan and District Town centres and allow an objective assessment of saturation levels where applications for betting shops are made. We therefore consider the document to be sound.

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Yours sincerely,



**NIALL HANRAHAN MRTPI
SENIOR PLANNER
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