

Local Plan Team  
London Borough of Haringey  
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225 High Road  
Wood Green  
London  
N22 8HQ

Ref: 261/MEN

Date: 13<sup>th</sup> January 2017

By email to: [localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)

Dear Sirs,

**Representation to Haringey Local Plan Main Modifications**  
**Tottenham Area Action Plan – Site Allocation BG2: Bruce Grove Stationcourt & Paragraph 5.74**

We write on behalf of our client, Mr A. Mentesh of MEMS DIY Ltd.

Detailed representations were made on 4<sup>th</sup> March 2016 to the Regulation 19 Local Plan consultation concerning the above listed Site Allocation and related text. The basis for the client's objection as made was that the Site allocation was not justified, not effective and not consistent with national planning policy. The council will recall that our client operates his business from 22-24 Moorefield Road, the land of which forms part of the wider BG2 Site Allocation.

We have reviewed the various consultation and background documents for Main Modifications consultation and it appears that no modifications to the Tottenham Area Action Plan are proposed to be made by the council, either to the policy allocation BG2 or the related text insofar as this affects 22-24 Moorefield Road.

Our client therefore maintains his objection to the Local Plan as per the original representations.

We note that prior to the Examination in Public last summer, the Independent Inspector set out matters which the council were required to address. In the 'Matter and Issues' document, at Matter 4 Question 16 the Inspector states:

*"16. TG2, BG2. How has the effect on the existing community or business use been taken into account? Can it be demonstrated that these sites are deliverable if there are existing, viable uses."*

The council subsequently issued a note entitled 'Matter 4 Response' which sets out its response to Question 16 as follows:

*"In the case of BG2, it is observed that there is currently a viable builder's merchant located next door to a London Zone 3 rail station. This is not the most suitable use for this high PTAL location. The Council will support the relocation of the builder's merchant to create an opportunity for new mixed use development on this site."*

In our view the council's response is inadequate. It does not fully or properly address the issues raised by the inspector particularly concerning impacts on the existing business or community. Neither does it address the key issue of deliverability, noting the client's lease arrangements. It is clear that the inspector had been concerned by the matters raised in our client's original representations. This lends further force to our client's belief that he should maintain his objection as before.

Our client has traded from Moorefield Road for over 30 years. The business provides the local community with a local and personal service that cannot be provided by the bigger stores. The business is positioned so that the elderly and infirm can still attend the premises. The company is a major part of the community providing the carnival with vehicles and providing maintenance services to the local schools as well as the old and disabled.

From conversations with planning officer, it appears there is an acknowledgement from the council that the full redevelopment of site BG2 could only happen if our client chooses to relocate or if there is a hostile compulsory purchase. Our client is not intending to relocate mainly because the business operation is established in this location and it operates on favourable lease terms. Even if there were any intention to relocate there is seemingly a lack of available and suitable sites. It is also doubtful whether lease terms of other sites could be as favourable as existing.

We trust these objections will be taken into account. Assuming the Inspector agrees with our position we would expect that modifications to the Local Plan concerning BG2 will be made accordingly.

Yours faithfully,



**Chris Loon** BSc (Hons), Dip TP, MRTPI  
Director