

LADDER COMMUNITY SAFETY PARTNERSHIP

Lcsp@blueyonder.co.uk

Roland Sheldon
Planning, Regeneration and Economy
Haringey Council
River Park House
225 High Road
Wood Green
London N22 8HQ

1 October 2018

Dear Mr Sheldon,

HGY/2018/2740: 51 Grand Parade London N4 1AG
Change of use from retail A1 to provide additional seating for
existing restaurant at 52-53 Grand Parade

The Ladder Community Safety Partnership (LCSP) is an umbrella organisation, representing numerous Residents' Associations and Neighbourhood Watches and aims to represent the views and concerns of local residents in the Ladder and Green Lanes area of Haringey, as expressed in our regular monthly meetings and updates. We have hundreds of members across the local area of Harringay Ward, and have worked in partnership with key organisations such as LBH and the Metropolitan Police for nearly twenty years.

Numerous residents have asked the LCSP to write to you regarding this application because of the very important issue of change of use to A3 in Green Lanes, with consequent loss of retail outlets - an issue which has been discussed at many of our monthly meetings.

The LCSP and other key stakeholders, such as the Gardens Residents' Association (GRA) and the Traders' Association, have been working together for many years to improve and regenerate Green Lanes. A principal component in our programme has been the enforcement of planning and licensing policy for all the premises in the area. This has led to a big improvement in the vitality and vibrancy of Green Lanes, but this can only be maintained by both respecting and adhering to the Council's clearly stated planning policies in respect of town centre development.

In this context, the LCSP has always taken the same line as the Council's own planning Policies, as currently stated in the Development Management DPD and the Local Plan Strategic policies, 2013-2026.

The most relevant policy statements are

SP10 Town Centres (esp. 5.3.17 and 5.3.18)

DM42 Primary and Secondary Shopping Frontages (esp. 6.34 and 6.35)

All of these policies clearly state the conditions which must be met before change of use from A1 to A3 is allowed within the primary frontage of town centres, as in the current application. Key points include:

- *'the Council will seek to retain all A1 use within the primary frontage.... Within the primary frontages, A1 retail is the principal and dominant land use...'* (SP10, 5.3.17)
- *'To preserve the viability and vitality of the primary and secondary frontages, no more than two adjoining frontages should be in non-A1 use...'* (SP10, 5.3.18)
- *'It is imperative that non-retail uses do not diminish the attractiveness of Haringey's Town Centres or weaken the effect of the retail functions, character and appearance of the primary shopping frontage. The council will therefore resist proposals that would adversely impact on the continuity of the frontage by seeking to ensure, as a guideline, no more than two adjoining units are in non-retail use...'* (DM42, 6.35)
- *'This policy applies a threshold approach to both monitor and maintain a healthy balance of uses. The council considers that 35% [non A1] is a reasonable indicator of the point at which the high proportion of retail uses appropriate to primary shopping frontage may be threatened...'* (DM42, 6.34)

It is therefore necessary to examine the current application in the light of these standard policies which have only recently been approved, and therefore must represent current policy aims (though they are also in line with those in past documents).

It is obvious that the application falls at the first hurdle because it would lead to more than 2 adjoining frontages in non-A1 use. The configuration of the block is shown in the Appendix below. It would also mean that the block would contain 8 out of 10 non-A1 uses, ie a massive 80%, and a density of only 20% in A1 use, as opposed to the recommended threshold of 65%.

The same argument applies for the Green Lanes Town Centre as a whole. A survey commissioned by the Council in 2013 revealed that the number of A1 units had already fallen significantly below the 65% threshold specified in the policies noted above. It is worth noting that the figure has further deteriorated below this threshold because the recent Town & Country Planning Order allows smaller sized A1 shops to change to A3 use (for a limited time period) as permitted development. The current proposal would therefore further reduce the proportion of A1 uses in Green Lanes to the detriment of the viability and vitality of the area as a district centre.

Finally, leaving specific policies aside, the fundamental question is what sort of High Street we want to see in Green Lanes. We have already reached a situation in which A3 restaurant/cafe use is so overwhelming that A1 retail units are fast disappearing and, therefore, finding it more difficult to survive if they remain. The recent Town and Country Planning Order 2015 (noted above) has, for example, led to the (temporary?) loss of several shops on Grand Parade. This means that it is even more important for the council to protect all of the remaining A1 outlets whenever it is possible to do so.

We do not want to see a single-use future for Green Lanes and believe that we should pause for thought and realize what we are doing if we allow another triple sized A3 restaurant/cafe to open. Indeed, the planning policies of Haringey Council noted above encourage just this careful approach, in order to secure an appropriate balance of outlets in the borough town centres.

If granted, there will obviously be scope and encouragement for many other similar cases, until A1 retail shops vanish almost completely from Green Lanes. We would therefore ask the Council to be aware of the bigger picture as well as the claims of the individual applicant.

For all these reasons, and particularly in the light of Policies SP10 and DM42, we are of the view that this application should be refused planning permission.

Yours sincerely

Ian Sygrave

Chair, on behalf of the LCSP

APPENDIX

Premises on Grand Parade between Roseberry and Rutland Gardens

No.	Name	Use Class
44-47	Antepliler	A3 x4 (café, restaurant, café/patisserie)
48	Golden Shots AGC	Sui Generis
49	Choppy Cuts Boutique	A1
50	Paprika Grocer	A1
51	Proposed Diyabakir	A3 (currently A1, Poziomka Grocer)
52-53	Diyabakir	A3 x2

If permitted, this would lead to a massive 8 out of 10 (80%) non-A1 use in the block.