



Planning Policy Team
Level 6
River Park House
225 High Road
Wood Green
London N22 8HQ

4 March 2016

By email only
ldf@haringey.gov.uk
let.004.ACC.PD.20870002

Dear Sir/Madam

**LB HARINGEY LOCAL PLAN – SITE ALLOCATIONS REGULATION 19
CONSULTATION**

We write on behalf of our client, Sainsbury's Supermarkets Ltd, in respect of the current Regulation 19 consultation stage of the Haringey Site Allocations DPD.

Sainsbury's currently has a number of stores in the Borough, both supermarkets and convenience stores, and is always looking at opportunities to improve and expand upon its existing offer. Given this, Sainsbury's has a keen interest in the Council's emerging policy and the implications for its existing estate and future aspirations.

Having reviewed the current draft document, we have significant concerns regarding the implications of the emerging policy with respect to Sainsbury's existing estate. In particular, these concerns relate to:

- Site Allocation SA 14, which incorporates Sainsbury's existing store at 54-58 High Road;
- Site Allocation SA29, which incorporates the Sainsbury's store on Williamson Road; and
- Related to the above, Policy SA3 which proposes alterations to the boundary of the Green Lanes District Centre.

We deal with each of these issues in turn below, but strategically, Sainsbury's is clear that it wishes to and will retain these important existing stores. Both of these stores serve as key facilities for the local community and, as such, Sainsbury's intends to continue to operate from them.

With this in mind, we are extremely concerned that the Council has not based these proposed allocations on appropriate co-operation with Sainsbury's in accordance with guidance contained within paragraph 157 of the National Planning Policy Framework (NPPF). In addition, the paragraph 160 of the NPPF clearly advises that:

Local Planning Authorities should have a clear understanding of business needs within the economic markets operating in and across their area.

To achieve this, LPA's should "work closely with the business community to understand their changing needs and identify and address any barriers to investment...".

Having considered the proposed policies, Sainsbury's does not consider that the Council has discharged its duty in respect of these elements and, therefore, these policies cannot be considered to be justified or consistent with national policy. As such, the aforementioned policies cannot be considered as sound.

We now address the specific policies.

Site Allocation SA 14: 16-54 Wood Green High Road

The preferred strategy for this site, which incorporates the existing Sainsbury's store, is to provide for the mixed-use redevelopment of the site to comprise town centre retail uses at ground and first floor level with residential uses above.

As currently drafted, we object to this proposed allocation. Whilst Sainsbury's would be happy to explore options to contribute to the redevelopment of this site, the current wording provides no security to Sainsbury's that any redevelopment would re-provide a foodstore on the site.

The Sainsbury's store at 54 Wood Green High Road is a key anchor store for the Wood Green Metropolitan Centre having opened in 2003. As such, any proposed policy must allow for the continued use of the site as a foodstore. Recognition of Sainsbury's occupation of the site, its important anchor role within the Metropolitan Centre, and the potential for this convenience retailing use to continue, is fundamental in the formation of a robust and ultimately sound policy.

As such, we consider that the use allocation for this site must be amended to state:

Comprehensive redevelopment of current High Road frontages for mixed use development consisting of town centre uses at ground and first floor level, including the suitable re-provision of the existing supermarket on-site, with residential above, and a potential new Crossrail 2 station entrance onto Wood Green High Road.

The above wording will incorporate sufficient flexibility into the allocation to ensure it is aspirational yet realistic in accordance with national guidance. Importantly, the amended allocation would specifically ensure that a supermarket use can continue during the lifetime of the DPD. However, the wording will also ensure that the sustainable redevelopment of the site can

come forward if viable.

Policy SA3: Changes to Town Centre Boundaries

Site Allocation SA29: Arena Retail Park

In respect of the Green Lanes District Centre, Policy SA3 proposes the reduction of the town centre boundary to reduce the envelope from that of the existing Retail Park to the Green Lanes frontage.

In addition, the preferred allocation (SA29) for the Arena Retail Park provides for the long-term potential for redevelopment of the existing retail park but does not specifically provide for the retention of the existing Sainsbury's store on the site.

We are surprised and concerned at the approach that the Council is taking to these two policies given the undoubted importance of the Sainsbury's store in serving the local community but also in helping the Green Lanes District Centre fulfil its retail function.

Town Centre Boundary

In short, we consider that there is no justification to support this proposed amendment to the town centre boundary as the Council's own evidence base does not support this approach.

The NLP Retail and Town Centres Study (2013) does not recommend this change. Indeed, paragraph 15.26 of the Study clearly identifies that (our emphasis):

*We consider the **town centre boundaries** and primary/secondary shopping frontages **to be appropriate** for Wood Green, Muswell Hill and **Green Lanes**, having regard to both the existing situation and the identified site allocations for potential development within them.*

To clarify, the Council's own up-to-date evidence base is recommending that the current policy position, with the Arena Retail Park and the Sainsbury's store included within the boundary of the Green Lanes District Centre, should be retained. Given this, the amendments proposed by policy SA3, in respect of Green Lanes, are entirely unsound. It is simply unjustified and inconsistent when viewed in the context of the Council's own evidence base and national planning policy.

Furthermore, Paragraph 15.17 of the NLP Study advises that district centres will usually comprise groups of shops often containing at least one supermarket or superstore while the London Plan suggests district centres traditionally provide convenience goods and services for more local communities and are accessible by public transport, walking and cycling.

The Sainsbury's store is the key supermarket within the District Centre. NLP clarify that the Iceland store is only 530 sqm (net sales), which is only slightly above the offer of a convenience store, with Tesco only operating an Express format store. At 4,341 sqm, the Sainsbury's store is by far the largest convenience store within the centre and, given the size of other units, is the only store which provides a true supermarket offer within the context of providing a main convenience goods shopping destination within Green Lanes.

Given this, and in accordance with the definition of a District Centre, the Sainsbury's store must remain within the town centre boundary. It is the only logical approach which will be found sound at Examination.

Site Allocation SA29

In addition to the above points which are again relevant here, the NLP Study highlights a number of other key points which lend further credibility to the argument that the Council should recognise the existing Sainsbury's store as a key anchor for the district centre. These include:

- The centre serves an important local function to shoppers from the borough and the Haringey locale (paragraph 9.1); and
- Paragraph 9.6 confirms that the district centre primarily serves a convenience shopping destination and only has a limited selection of comparison shops.

It is clear that the Green Lanes District Centres serves an important convenience shopping destination in the borough and, as a key anchor store, the Sainsbury's store will be critical in ensuring that the centre continues this role. As such, it seems remiss that specific provision is not made for the retention of the store as part of any potential redevelopment of the site.

It is important to emphasise that Sainsbury's is keen to explore options which could allow for the redevelopment of the Retail Park, if redevelopment is deemed appropriate and suitable. However, the current wording again provides no security that a foodstore would be part of the scheme. This does not seem an effective or justified approach.

Re-wording Required for Policy SA3 and Site Allocation SA29

In light of the above, the following amendments are required.

Policy SA3

In short, the current text regarding the boundary for the Green Lanes District Centre should be deleted. In accordance with the evidence base, the boundary for the District Centre should be retained as currently provided by Haringey policy ie the Arena Retail Park and the Sainsbury's store on Williamson Road should be included.

Policy SA29

The proposed Site Allocation for SA29: Arena Retail Park should be amended to state:

Long-term potential for redevelopment of the existing retail park to produce access improvements to Harringay Green Lanes station and Finsbury Park, reconfigured road layout, and new residential and commercial development, including the suitable re-provision of the existing supermarket on-site

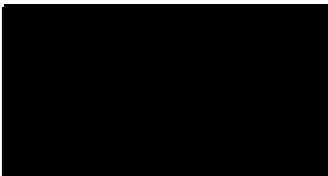
The above changes ensure that the Council can proceed on the basis of robust planning policies which accord with national planning policy and its own evidence base.

Conclusions

We trust that the above representations will be considered appropriately before the Site Allocations DPD is submitted to the Secretary of State for Examination. In the meantime, we would welcome the opportunity to meet with officers to discuss the implications of these representations and the proposed site allocations.

Finally, we would like to reserve our right to appear at the Examination hearings and we would be grateful if you keep us informed of the Council's preparation of the Local Plan document.

Yours sincerely



Andrew Pepler

cc: Mr A Cundale, Sainsbury's Supermarkets Ltd