Public Examination into the Haringey Core Strategy June 2011

Indicative Matters and Issues for Examination

Hearing 3

Matter 6

Does the CS provide the most appropriate and sufficiently comprehensive strategy towards town centres and retail provision in the context of the Borough and with due regard to cross border issues? Is the approach in general conformity with the London Plan and evidenced adequately with due regard to PPS4? Will the approach be effective, particularly with regard to flexibility?

i The Core Strategy approach towards town centres and retail provision is based on the principles of sustainable development as set out in PPS4 and local spatial planning set out in PPS12.

ii SP10 Retail and Town Centres is in general conformity with the London Plan. The policy seeks to support and promote the borough's hierarchy of town centres as existing successful and vibrant town centres and places that will attract new businesses, jobs and homes during the life of the Core Strategy.

iii In line with PPS4, the approach to retail is considered to be flexible in responding to changing economic circumstances.

1 Issue 6.1

To what extent is the Core Strategy and SP10 in general conformity with the London Plan, its draft replacement and PPS4? Do areas of discord remain?

1.1 The Core Strategy and SP10 is in general conformity with the London Plan and its draft replacement for reasons set out below.

The London Plan, Consolidated with Alterations (2008)

1.2 Policy 2A.8 **Town Centres** sets out an over-arching approach to support and regenerate town centres. The policy advises boroughs to use the network of town centres shown on Map 3D.1 in the London Plan as the basis for policy development and delivery within them. This is reflected in SP10 Town Centres of the Core Strategy. The policy establishes the hierarchy of town centres within the borough. The spatial arrangements of the retail centres provides a basis for

shaping Haringey, for locating community infrastructure and building attractive and distinctive focal points for neighbourhoods for sustainable growth and regeneration of the borough.

1.3 London has a complex network of town centres and five broad types have been identified; international, metropolitan, major, district and local and neighbourhood.

- **International Centres** – London has two such centres, Knightsbridge and the West End. These centres are defined as major concentrations of globally attractive, specialist or comparison shopping.
- **Metropolitan Centres** – London has 11 such centres, and one is located in Haringey – Wood Green. Metropolitan Centres are mainly in the suburbs and serve wide catchment areas covering several boroughs and offer a high level and range of comparison shopping.
- **Major Centres** – the London Plan identifies 35 major centres. Not one of these centres are located in Haringey. They are characteristically important shopping and service centres with a borough-wide catchment.
- **District Centres** – London has 146 district centres, five of which are in Haringey; Tottenham, West Green Road, Green Lanes, Crouch End and Muswell Hill. District Centres have traditionally provided convenience goods and services for more local communities to meet their day-to-day needs. Developing the capacity of district centres for convenience shopping is critical to ensure access to goods and service at the local level, particularly for people without access to cars.
- **Neighbourhood and more local centres** – typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may contain a small supermarket (less than 2,000 sqm), sub-post office, pharmacy, launderette and other local services. The London Plan identifies over 1,200 neighbourhood and local centres which provide services for local communities. Haringey has 38 Local Shopping Centres.
- **Central Activities Zone (CAZ)** – a supplementary classification that refers to mixed use areas in the CAZ usually with a predominant retail function.

1.4 Policy 3D.1 **Supporting Town Centres** states that boroughs should enhance access to goods and services and strengthen the wider role of town centres.

1.5 Policy 3D.2 **Town Centre Development** states that DPD policies should assess the need and capacity for additional retail, leisure, commercial and other town centre development and reconcile these

by making appropriate provision following the sequential approach in identifying suitable sites.

1.6 Policy 3D.3 **Maintaining and improving retail facilities** recommends that boroughs should work with retailers and others to prevent the loss of retail facilities, including street and farmer's markets that provide essential convenience and specialist shopping.

The Draft Replacement London Plan, (2009)

1.7 The DRLP sets out planning policies for London from 2011 – 2031.

1.8 Policy 2.15 **Town Centre** states that boroughs should coordinate the development of London's network of town centres in the context of Map 2.6 and Annex 2. It is considered that SP10 reflects this approach. It is important to note that all Haringey's town centre designations have remained , through the review of the London Plan, however, Wood Green Metropolitan Town Centre has been identified as a 'medium growth' centre which means there is moderate levels of demand for retail, leisure or office floorspace and with physical and public transport capacity to accommodate it. The centre is also in need of regeneration. This policy also highlights the potential future changes to the town centre network over the London Plan period. This potential is reflected in the policy text of SP10 and paragraph 5.3.54.

1.8 Policy 4.7 **Retail and town centre development** states that LDFs should identify future levels of retail and other commercial floorspace need in light of strategic and local assessments, carry out town centre health checks, take a proactive approach to identify capacity and bring forward development on the edge of town centres, firmly resist inappropriate out of centre development and manage existing out of centre retail and leisure development in line with the sequential approach.

1.9 Core Strategy SP10 is also in general conformity with Policy 4.8 **Supporting a successful and diverse retail sector.** This policy states that boroughs should bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major centres, as well as supporting convenience retail in District, Neighbourhood and more local centres to secure a sustainable pattern of provision and strong 'lifetime neighbourhoods'. It is considered that SP10 is in general conformity with this replacement London plan policy. However, it is important to mention that issues like street and farmers markets will be set out in more detail in the Council's Development Management DPD. These markets can make valuable and distinctive contributions to extending competitive choice and access to a range of goods, as well as contributing to the vitality and wider off of town centres.

2. Issue 6.2

Is the evidence base to SP 10 robust and credible? With regard to PPS4 (eg Policy EC1), is the evidence base robust and sufficiently up to date (eg Retail Study 2008)? Is the hierarchical approach and the hierarchy identified justified by the evidence base?

2.1 Although the Retail Study was produced before PPS4 was published the Council believes that the evidence base meets the requirements of PPS4. The Retail Study (2008) does recommend that the findings should be updated in 4 – 5 years and floorspace projections rolled forward. An update would provide revised capacity projections. As the study provides a broad overview of the potential need for further retail and leisure development up to 2016, with longer term forecast up to 2021, the Council considers the evidence underpinning SP10 is credible.

2.2 The town centre hierarchy is justified by the evidence base, Haringey's Retail Study, 2008. The main findings suggested that the borough should continue to protect all its town centres – one Metropolitan Centre, five District Centres and 38 Local Shopping Centres. This also reflects Policy EC3.1b of PPS4 and the London Plan and its draft replacement.

2.2 The Retail Study assessed the quantitative and qualitative scope for new retail floorspace in Haringey up to 2021. The Study suggests that Wood Green Metropolitan Town Centre is the main centre in terms of comparison shopping offer, followed by Green Lanes, Crouch End and Muswell Hill District Centres. Tottenham Hale Retail Park is also a main destination in terms of comparison shopping offer.

2.3 These centres provide a good range of comparison shopping destinations across the centre and south of the borough, however, there is limited comparison provision in the north of the borough. Nevertheless, residents in the north of the borough have good access to comparison shopping facilities in neighbouring boroughs, i.e. Enfield and Barnet. The household survey indicates that households in the northern part of the borough mainly undertake their non-food shopping outside the borough in Enfield.

2.4 as stated above, the Retail Study provides a broad overview of the potential need for further retail and leisure development up to 2016, with longer term forecast up to 2021. However, projections are subject to uncertainty and forecasts may need to be amended to reflect emerging changes as and when new information becomes available. In light of this, the Council will monitor and update the town centre health checks to assess changes in the vitality and viability of the centres. In particular changes in the land use and vacancy rates will be monitored.

3. Issue 6.3

Are there any town centre health checks available?

3.1 Yes. Town Centre health checks were carried out in 2009 and assessed the borough's Metropolitan Town Centre and five District Centres. They showed that the vacancy rate was well below the Council target of 10% and below London and national vacancy rates at 11% and 14% respectively. This reflects a lower vacancy rate compared to the previous years, e.g. 2007/08, which was between 4.7% and 8.8%. This is positive despite the economic downturn. The Council will continue to carry out health checks in order to monitor the impact of the downturn in particular and review policy accordingly through the AMR process.

3.2 To ensure there is as up to date information in the Core Strategy as possible the Inspector is asked to consider the following further minor change, to be inserted at the end of paragraph 5.3.22:

"Results from the 2009 Town Centre Health Check showed that vacancy rates in Haringey's Metropolitan and District Town Centres were well below the Council target of 10% and below London and national vacancy rates of 11% and 14% respectively. The Council will continue to carry out health checks of its town centres and monitor any impact through the Annual Monitoring Report".

4. Issue 6.4

Where is the evidence that existing centres have the capacity to accommodate new development? (PPS4). Where is evidence that growth of retail floorspace can be accommodated as proposed – quantum and locations (PPS4)? Particularly in Wood Green?

4.1 The evidence that existing centres have the capacity to accommodate new development is set out in Haringey's Retail Study 2008. This study identifies that Haringey will require an additional 13,800 m2 of gross comparison goods floorspace and an additional 10,194 m2 net convenience goods floorspace by 2016. This is on average an annual target of 2,999 m2 of additional retail floorspace.

4.2 In terms of accommodating future growth, the sequential approach suggests that town and district centres should be the first choice for retail development, supported by PPS4 and London Plan policies. In Haringey the preferred location for retail development needs to be carefully considered, particularly for major development which may have an extensive catchment area. Major development should be

located within the Metropolitan and District Town Centres, as suggested in the London Plan.

4.3 The retail capacity analysis in Haringey's Retail Study assumes that existing retail floorspace can, on average, increase its turnover to sales floorspace densities. The floorspace projections reflect these assumptions. In addition, to the growth in sales densities, vacant shops could help to accommodate future growth.

4.4 Vacant shop premises within the main and local centres could make a contribution towards meeting this floorspace projection (about 3,500 sqm gross), in particular small shop units within district and local centres.

4.5 Paragraph 5.3.24 of the Core Strategy states that Wood Green needs between 7,000sqm – 11,000sqm additional comparison floorspace by 2016. The Wood Green Town Centre SPD sets out a clear and detailed vision for the town centre, together with a strategy for its future regeneration and development. The SPD identified a number of opportunity zones to guide further retail intensification in order to enhance its role and status as a Metropolitan Town Centre for further intensification of retail uses.

5. Issue 6.5

Does the evidence base take due account of the provision of services and facilities within deprived areas? Does the CS plan adequately for and/or prioritise such areas?

5.1 The Retail and Town Centre Study recognised that shopping needs may vary considerably across the borough, often related to socio-economic characteristics. For example, residents without access to a car within areas poorly served by public transport or those on low incomes will have different needs to those who are mobile by car or who enjoy higher incomes. Lower income groups without access to a car may be less able to travel to shopping facilities and may also be socially excluded from higher priced shops. Therefore, the availability of local shopping facilities near to residential areas or within a short journey by public transport, or discount/value retail facilities may be important for these groups. In recognition of this need, the consultants were asked to assess our designated local shopping centres.

5.2 The Study recommended that all local shopping centres be maintained, to ensure that residents have access to local shops and services, ensuring the provision of services and facilities within deprived areas. This is reflected in the borough's town centre hierarchy, as set out in SP10. It is important to note that these local shopping centres will be further protected in the emerging Development Management policies.

6. Issue 6.6

How does the CS meet the aims of Policy EC4 of the PPS4?

6.1 Please see Factual Statement 3 which sets out how the Core Strategy meets the aim of Policy EC4 of PPS4.

7. Issue 6.7

Is there an intention to designate Tottenham Hale as a District Town Centre – is this reflected adequately in the CS?

7.1 Yes, there is an intention to designate Tottenham Hale as a District Town Centre over the life of the Core Strategy. Policy EC3bi of PPS4 indicates that a local authority can designate new centres where necessary giving priority to deprived areas with significant levels of multiple deprivation, where there is a need for better access to services, facilities and employment.

7.2 As set out in the Tottenham Hale Urban Centre SPD, the existing retail park will become a higher quality location, with a more diverse range of goods, including convenience shopping. The Retail Centre will provide a wider, more varied, offer of goods for the existing and new communities than currently exists at Tottenham Hale. The longer term vision for the retail centre envisages a significant redevelopment of the retail park with provision for higher quality retailing units on the northern edge, and ground floor retail units on the south, east and west faces of the Hale peninsular site. There is a significant opportunity at Tottenham Hale to accommodate the retail growth set out in SP10; additional 13,800 sqm gross comparison goods floorspace and an additional 10,194 sqm net convenience goods floorspace.

7.3 There is currently significant change taking place in Tottenham Hale as part of the regeneration programme. Since 2009, a total of 3,000 sqm additional retail floorspace has been completed in the borough.

7.4 The potential for future changes to the classification of town centres in the network, including potential new centres, taking into account growth prospects and development in the planning pipeline is also highlighted in the GLA Town Centre Health Check (2009). Twelve centres, including Tottenham Hale, have been identified across London for possible re-classification.

7.5 Whilst the intention to designate Tottenham Hale as a District Centre is referenced in the last paragraph of SP10 and paragraphs 5.3.53 & 5.3.54, it is suggested, with the Inspector's agreement that a

Proposed Further Minor Change, after paragraph 5.3.54, is included to read the following:

"In line with PPS4 and the London Plan, it is the Council's intention to designate Tottenham Hale as a District Centre over the life of the Core Strategy. Further detail regarding this designation will be set out in an Area Action Plan for Tottenham Hale".

7.6 This will ensure that the intention to designate Tottenham Hale as a District Centre is adequately reflected in the Core Strategy.

8. Issue 6.8

Should the CS address matters of retail frontage uses?

8.1 In line with Policy EC3.1(c) of PPS4, primary and secondary frontages are shown on the proposals map, taken from the UDP. The Council doesn't believe the Core Strategy should address in detail the exact uses of retail frontages. However, the Council does agree that a more detailed approach to retail frontages is required and this will be included in the Development Management DPD.

9. Issue 6.9

Does the CS address adequately the small scale local provision of shops and services outside of town centres?

9.1 The overall approach to SP10 is to protect and promote the borough's town centre hierarchy in line with PPS4 and the London Plan. Paragraph 5.3.6 of the Core Strategy does set out the borough's town centre hierarchy and the importance and provision of small scale local shops is recognised here.

9.2 The Study showed that the existing provision of local centres centre within the borough offers a reasonably balanced distribution of local facilities serving local communities. These facilities complement the six main centres and have an important role in serving the day to day needs in their local areas. There are small areas of residential development which may be deficient in local shopping centre provision throughout the borough but some of these may be catered for by facilities outside the borough. Taking this forward, the Core Strategy SP10 protects the network of local centres to ensure that residents have easy access to local shops and services.

9.3 There are numerous parades and individual shops around the borough that have not been identified in the Core Strategy. These too can provide a valuable service to the community, meeting the day-to-day needs for shopping, services and facilities. Through the Development

Management policies, the Council will therefore seek to retain these units unless it can be demonstrated that they no longer serve a function to the local community. Where this is the case the preferred non retail uses are A2, A3, A4, or A5 uses or other uses of an appropriate size and scale for commercial and community purposes, including health and police facilities, or uses that meet an identified local need, as identified in the Council's Community Infrastructure Plan.