Tottenham Retail Impact Assessment

Final Report | February 2016

on behalf of Haringey LONDON

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For and on behalf of GVA Grimley Ltd

1 INTRODUCTION

1.1 Bilfinger GVA has been instructed by the London Borough of Haringey (LB Haringey) to undertake a retail impact assessment of the development of a new district centre at Tottenham Hale. The impetus for the transformation of Tottenham Hale to a district centre is set out in the Council's emerging planning policy framework, and in particular the Council's review of its Local Plan Strategic Policies document, the most recent version of which was consulted on in February 2015. The Strategic Policies document confirms the Council's aspirations for considerable growth in the Tottenham Hale and North Tottenham areas, the latter including Northumberland Park, the redevelopment of Tottenham Hotspur Football Stadium, and a major proposed development at High Road West (HRW).

1.2 All of these areas are also covered by the emerging Tottenham Area Action Plan (TAAP), which also includes existing district centres at Bruce Grove / Tottenham High Road and West Green Road / Seven Sisters. The development of a new district centre at Tottenham Hale forms an important component of the Council's wider growth aspirations for the Tottenham area. In order to ensure that the aspirations of the Council can be fully supported in policy, it is necessary for the Council to have a robust evidence base which demonstrates the proposed district centre at Tottenham Hale can be supported without impacting on the vitality and viability of the surrounding network of centres.

The context of the study

1.3 The emerging TAAP sets out a vision that Tottenham will be 'the next great area of London', highlighting the opportunity to build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered, and the availability of large development sites. The emerging TAAP seeks to realise the significant potential for urban renewal and intensification within and surrounding the existing centres at Bruce Grove/Tottenham High Road and West Green Road/Seven Sisters, and makes it clear that the Tottenham Hale neighbourhood will be the focus of 'comprehensive regeneration'.

1.4 The combination of transformative actions and continuous incremental improvement will unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London's growth and its position in a world city. Tottenham's transformation is intended to benefit existing as well as future residents of Tottenham, building on the strength and resilience of the existing community to help deliver a positive future for Tottenham.

1.5 The TAAP area comprises of a number of 'growth areas' and 'areas of change'. Tottenham Hale and North Tottenham (which includes the HRW and Northumberland Park areas) are both identified as 'growth areas', whilst Bruce Grove, Tottenham Green and Seven Sisters are all identified as 'areas of change'. The key diagram (**Figure 1.1, page 4**) shows the overall boundaries of the TAAP area, the location of the growth areas (shown in light green) and areas of change (shown in light blue), and existing public transport and pedestrian connectivity.

1.6 The redevelopment proposals in the growth areas at Tottenham Hale and North Tottenham will result in a significant new residential community being developed in the Tottenham area. This has implications both for the role and performance of the existing network of centres in the TAAP area, but also need and demand for new retail and commercial leisure floorspace, both quantitatively (the new residents will generate expenditure which can support new retail floorspace) and qualitatively (it will need to be ensured that current and new facilities meet the requirements of existing and future populations, the latter of which may in part be of different socio-economic composition in comparison to the current population of the area). The characteristics and accessibility of the TAAP area could also be expected to change further if the proposals for Crossrail 2 (which would link Tottenham directly with central and south-west London via stops at Seven Sisters, Tottenham Hale and Northumberland Park) are brought forward.

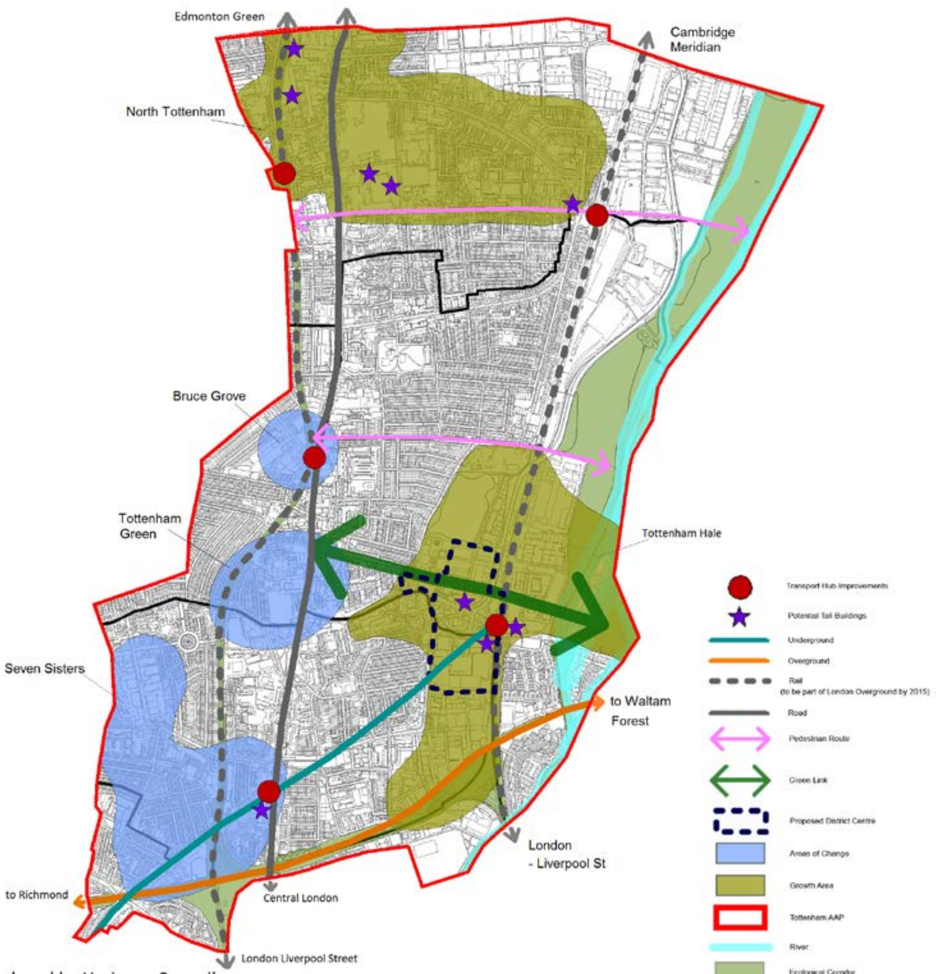
Tottenham Hale Growth Area

1.7 The aspiration for Tottenham Hale, established in both the emerging TAAP and Draft Local Plan, is for it to become a new District Centre by 2025, acting as a major transport hub and the focus for a substantial new residential community of 5,000 new homes (out of the total of 10,000 planned for the wider TAAP area). Tottenham Hale is also proposed to become an important employment hub, with the creation of around 4,000 new employment opportunities (out of the total of 5,000 planned for the wider TAAP area) through class B1 development around Tottenham Hale station, and an increase in creative industries and light industry.

1.8 As noted above, a key focus of regeneration of Tottenham Hale will be the enhancement of public transport linkages, including redeveloped bus and rail stations, enhanced train frequencies, and a stop on the proposed Crossrail 2 route to Wimbledon/Surrey via central London. A new road layout and significant public realm enhancements are also planned, creating a more traditional street network and enhancing pedestrian movement through the area, including improving accessibility between Tottenham Hale and Tottenham High Road / Tottenham Green, Down Lane Park and the Lee Valley.

1.9 The Council envisages that the new district centre at Tottenham Hale will be created through the redevelopment of the existing Tottenham Hale Retail Park (THRP) and Ashley Road area. The location of the District Centre within the wider growth area is shown by the dark blue-hashed line in Figure 1.1. It is expected that the district centre will provide a range of 'town centre' uses, such as retail, office, hotel, community, leisure and higher education facilities. There is a substantial existing quantum of comparison (non-food) retail floorspace at Tottenham Hale on account of the presence of the Retail Park; the expectation is this floorspace will be reduced to provide a more balanced mix of convenience (food) retail, comparison retail, and other 'town centre' uses as described above. We discuss this further in **Section 4.**

Figure 1.1: TAAP area boundary



Produced by Haringey Council

North Tottenham Growth Area

1.10 There is considerable development activity currently underway and planned within the North Tottenham Growth Area, which includes the HRW and Northumberland Park areas). At Northumberland Park, Tottenham Hotspur Football Club was granted planning permission by Haringey Council in 2011 for the redevelopment of the White Hart Lane Stadium and the surrounding land. This scheme was known as the Northumberland Park Development (NPD) scheme. Phase 1 of the NPD scheme has been completed and comprises a new 7,200 sq.m (net sales) Sainsbury's foodstore on Northumberland Park Avenue, and Lilywhite House which is home to Tottenham University Technical College as well as the Football Club's offices.

1.11 Tottenham Hotspur have submitted revised proposals for the remainder of the site. These changes comprise a larger stadium (61,000 seats rather than the 56,250) and more flats (579 rather than 285). Other features of the revised proposal are a new club store and museum described as 'The Tottenham Experience', an extreme sports centre, a 180 bed hotel, a community medical centre and new public square. The proposals also include works to the Grade II Listed Warmington House and the demolition of three locally-listed buildings.

1.12 The nature of the proposed development at Northumberland Park responds to the emerging TAAP's aspiration that the new stadium will provide a catalyst for the '*comprehensive regeneration of both High Road West and Northumberland Park*', with the priority being to '*ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road and wider urban realm improvements that will take place as part of this development'*. Accordingly, the emerging TAAP proposes '*new community facilities and leisure-orientated development to further cement the area's reputation as a premier leisure destination within north London*'.

1.13 As with Tottenham Hale, significant residential growth is planned for Northumberland Park, with 3,850 net additional dwellings proposed and a programme of estate renewal to be undertaken. It is also anticipated that proposed employment provision could create up to 2,000 additional jobs.

1.14 Major development is also proposed at High Road West (HRW). Following two years of consultation with residents, the regeneration proposals for HRW were approved by Haringey Council's Cabinet in December 2014; the HRW Masterplan sets out how 1,200 new high-quality homes, community and leisure facilities and space for new businesses will be delivered. These plans are, as we discuss in this report, also expected to include a moderate quantum of new comparison goods retail floorspace.

Bruce Grove (Area of Change)

1.15 The Bruce Grove area is Tottenham's 'historic high street' and the Council's aspirations for this area are to consolidate and strengthen its role as the 'retail heart of the High Road', one which is able to meet the day-to-day shopping needs of the community (contrasting with the larger-format retail floorspace which is expected to come forward at Tottenham Hale). The emerging TAAP expects the scale of change in the Bruce Grove area to be more moderate compared to other parts of the TAAP area, based on the enhancement of existing retail, heritage and residential assets. Diversification of the retail offer (outside key frontages on the High Road) will be encouraged to create a night-time economy, with restaurants, cafes, workspaces and local businesses being suggested. It is expected that place marketing and the introduction of pop-up shops/'meanwhile' uses will also form important components of the reimagining of the centre.

1.16 The emerging TAAP suggests that there may be scope to consolidate or reduce primary shopping frontages within the town centre boundary along Bruce Grove, in order to intensify commercial provision along the High Road, 'freeing up' Bruce Grove (i.e. the stretch of the district centre along the A10) to accommodate the other complementary town centre uses identified above.

Tottenham Green & Seven Sisters (Areas of Change)

1.17 The Council identifies Tottenham Green area as being the 'cultural heart' of Tottenham, on account of the presence of facilities such as Tottenham Town Hall, Tottenham Leisure Centre, Marcus Garvey Library and the College of Haringey, Enfield and North East London, all of which are located around Tottenham Green. The Council considers that the area is not fulfilling its potential as Tottenham's cultural and civic hub, with an aspiration to enhance activity in the area, at all times of the day and throughout the week. The strategy for the area is therefore one of cultivation and enhancement of these facilities, and introducing public realm improvements and physical enhancement of key street frontages, as well as complementary cafes and restaurants to support and enhance the existing cultural offer.

1.18 At Seven Sisters, West Green Road will be enhanced to further enhance and develop its role as a specialist retail destination. In the longer term, the completion of residential-led developments at Apex House and Wards Corner will result in the introduction of a new residential community to the area, and both developments will also include ground floor 'town centre' uses (such as retail, café or rest, amounting to approximately 3,500 sq.m across both sites (draft TAAP Policy SS5 and SS6). The area also contains two housing estates (Helston Court & Russell Road and Brunel Walk & Turner Avenue) which are earmarked for renewal. A programme of improvements to the streetscape and public realm across the area is also proposed.

Structure of remainder of report

1.19 Having introduced the context within which our study is being prepared, the remainder of our report is structured as follows:

- **Section 2** sets out the planning policy framework, reviewing relevant national policy and the local policy context which sets out the framework for the development of a new district centre at Tottenham Hale;
- **Section 3** sets out provides a high-level review of the existing network of centres within and surrounding the TAAP area, including analysis of their retail offer and mix and a review of their 'vitality and viability', based on existing local authority evidence base studies and our own assessment of the performance of the centres
- **Section 4** sets out our assessment of the impact of comparison goods floorspace at Tottenham Hale district centre on the surrounding network of centres, and the cumulative impacts which could potentially arise when also considering the proposed comparison goods floorspace at High Road West;
- **Section 5** sets out our assessment of the impact of the provision of additional convenience goods retail floorspace at Tottenham Hale district centre against the existing network of foodstores and local shopping facilities in Tottenham and the wider area impact; and
- **Section 6** sets out our conclusions.

2 PLANNING POLICY CONTEXT

2.1 In this section we summarise the key features of national and local planning policy guidance which provide the context and framework for the remainder of this study.

National Planning Policy Framework (NPPF)

2.2 The National Planning Policy Framework (NPPF), published on 27 March 2012, sets out the Government's planning policies for England and replaces the suite of national Planning Policy Statements, Planning Policy Guidance and Circulars with a single document.

2.3 The NPPF continues to recognise that the planning system is plan-led and therefore Local Plans, incorporating neighbourhood plans where relevant, are the starting point for the determination of any planning application. In line with the Government's aim to streamline the planning process, each Local Planning Authority (LPA) should produce a single Local Plan for its area with any additional documents to be used only where clearly justified.

2.4 The NPPF maintains the general thrust of previous policy set out in PPS4 – Planning for Sustainable Economic Growth (2009). It advocates a 'town centres first' approach, and requires planning policies to positively promote competitive town centre environments and manage the growth of centres over the plan period. In planning for town centres LPAs should:

- Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- Define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary shopping frontages in designated centres and set policies that make clear which uses will be permitted in such locations;
- Promote competitive town centres that provide customer choice and a diverse retail offer which reflect the individuality of town centres;
- Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
- Allocate a range of suitable sites to meet the scale and type of economic development needed in town centres. Where town centre sites are not available, LPAs should adopt a sequential approach to allocate appropriate edge of centre sites;
- Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- Recognise that residential development can play an important role in ensuring the vitality of centres; and
- Where town centres are in decline, plan positively for their future to encourage economic activity.

2.5 LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. These assessments should be integrated and take full account of relevant market and economic signals. LPAs should use the evidence base to assess, inter alia;

- The needs for land or floorspace for economic development, taking account of both quantitative and qualitative requirements for all foreseeable types of economic activity over the plan period, including retail and commercial leisure development;
- The existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs;
- The role and function of town centres and the relationship between them, including any trends in the performance of centres; and
- The capacity of existing centres to accommodate new town centre development.

2.6 Local Plans will be examined by an independent inspector whose role it is to assess whether the plan is sound. In order to be found sound the Plan should be:

- **Positively prepared** i.e. based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- **Justified** i.e. the most appropriate strategy, when considered against the alternatives;
- **Effective** i.e. deliverable over its plan period and based on effective joint working; and
- **Consistent** with national policy i.e. enable the delivery of sustainable development

2.7 The NPPF adopts a positive approach, with a presumption in favour of sustainable development and support for economic growth. In terms of decision-making, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.

London Plan

2.8 On 10th March 2015, the Mayor adopted the London Plan (consolidated with alterations since 2011). This consolidated plan is now operative as formal alterations to the London Plan and forms part of the development plan for Greater London. It is a strategic spatial planning document setting the London-wide context within which individual London Boroughs must set their local planning policies.

2.9 The plan identifies a network of town centres across five categories; International, Metropolitan, Major, District and Local and Neighbourhood. Within LB Haringey, Wood Green is defined as a

Metropolitan Centre. Bruce Grove/Tottenham High Road, Crouch End, Green Lanes, Muswell Hill and West Green Road/Seven Sisters are defined as District Centres. The definitions are set out in Annex 2 of the London Plan:

- **Metropolitan Centres –** serve wide catchments which can extend over several boroughs and into parts of the wider South East region. Typically they contain at least 100,000 sq m of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions.
- **District Centres –** distributed more widely than the Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000–50,000 sq.m of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.

2.10 Policy 2.15 seeks to co-ordinate development within the network of town centres to ensure that they provide the main foci for commercial development; the structure for sustaining and improving a competitive choice of goods and services which are conveniently accessible; and the main foci for Londoners' sense of place and local identity. The policy states that any identified deficiencies in the network of town centres can be addressed by promoting centres to function at a higher level in the hierarchy or by designating new centres where necessary, giving particular priority to areas with particular needs for regeneration and better access to services, facilities and employment.

Opportunity Area Planning Framework (2013)

2.11 The Upper Lee Valley is identified as one of twelve 'Opportunity Areas' in East London. These are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. Typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure. The Upper Lee provides a range of development opportunities, and is supportive of growth at Tottenham Hale.

2.12 The Upper Lee Valley Opportunity Area Planning Framework (ULV OAFP) was adopted by the Mayor in July 2013. The OAPF sets out an overarching framework for the regeneration of the area, which is supported where necessary by boroughs' own planning documents for specific areas. It is Supplementary Planning Guidance to the London Plan and is used as a material consideration in the determination of planning applications. It is focussed around eight key objectives, including:

- Growth at Tottenham Hale, Blackhorse Lane, Meridian Water (Central Leeside) and Ponders End;
- Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park;
- Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities, as well as over 20,100 new homes;
- Full integration between the existing communities and the new jobs, homes and services provided as part of the new developments;
- Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area; and
- A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park.

Haringey Local Plan: Strategic Policies (2013)

2.13 On 18 March 2013, Haringey's Local Plan: Strategic Policies was formally adopted by Full Council. The adopted Local Plan: Strategic Policies, alongside the saved UDP policies (Unitary Development Plan), sets out how the council will address local and strategic development needs including housing, employment, leisure, and retail provision.

2.14 The hierarchy of town centres within the borough are established in Policy SP10 as follows:

- **Major Centre**: Wood Green
- **District Centres**: Muswell Hill, Crouch End, Tottenham High Road/Bruce Grove, Green Lanes and Seven Sisters/West Green Road

2.15 In accordance with Policy SP10, the Council will promote the distribution of retail growth to meet the required additional 13,800 sq.m gross comparison goods floorspace and an additional 10,194 sq.m net convenience goods floorspace by 2026. The Council will promote and encourage development of retail, office, community, leisure, entertainment facilities, recreation uses, arts and cultural activities within its town centres according to the borough's town centre hierarchy. The majority of the additional growth will be met in the above centres.

2.16 The policy notes, however, that it is possible to identify potential future changes to the borough's town centres over the life of the Local Plan, including potential new centres. Given the existing scale, role and function and mixed use development which is currently taking place at Tottenham Hale, the Local Plan confirms that there may be potential to designate 'Tottenham Hale Urban Centre' as a new District Centre. This change in designation will be decided as part of the next London Plan review in 2020.

2.17 Tottenham Hale Retail Park (THRP) is located at the core of the regeneration strategy for Tottenham. As set out in the Tottenham Hale Urban Centre Masterplan SPD, the site offers an opportunity to expand the retail offer in the area, particularly comparison shopping, and improve the frontage onto Ferry Lane. All of these future changes present an opportunity to review shopping provision and encourage uses that provide cohesion and connectivity to the two district centres, namely Tottenham/Bruce Grove and Seven Sisters/West Green Road, which are in the same locality.

2.18 In order to fully exploit the potential created by these changes and development in Tottenham Hale, an Area Action Plan has been produced, which will encompass proposals in and around THRP, which we summarise below.

2.19 The Council consulted on the draft Proposed Alterations to Haringey's Adopted Strategic Policies during February and March 2015. The changes to the Council's Strategic Policies are largely factual and reflect how the population levels of Haringey have changed since its adoption two years ago. In the draft Proposed Alterations, Policy SP10 has been amended to include an increase in the amount of convenience goods floorspace which the Council should plan for across the entire Borough (11,133 sq.m net convenience goods floorspace by 2016).

Tottenham Hale District Centre Framework (2015)

2.20 The Tottenham Hale District Centre Framework (THDCF) provides guidance on development form, massing, routes and movement, uses and design principles, and will help shape a strategy for the proposed district centre. Parallel studies have been undertaken to complement the guidance contained in the THDCF, including strategies for public realm, green and open spaces and meanwhile uses.

2.21 The THDCF has been prepared specifically to provide clarity and guidance relating to relevant development guidance for the identified opportunity sites in the district centre. This work has been informed through engagement with the community, stakeholders and key landowners / developer in the Tottenham Hale area. The THDCF forms part of the evidence base to inform the TAAP, which will in turn facilitate the implementation of proposals for the Tottenham Hale District Centre.

2.22 The site references in the THDCF correspond with the emerging TAAP proposed site allocations. In accordance with Proposed Site Allocation TH5, Tottenham Hale Retail Park will be comprehensively transformed into the commercial heart of a new district centre.

Tottenham Area Action Plan (Pre-Submission Consultation, January 2016)

2.23 The emerging Tottenham Area Action Plan (TAAP) provides an overarching planning and development strategy for a number of key growth areas in the east of the Borough. These include Tottenham Hale together with Seven Sisters, Tottenham High Road and the Northumberland Park area. The TAAP will, upon adoption, part of the Local Plan, alongside the Local Plan Strategic Policies, which was adopted in February 2013 but for which the Council are now working on alterations, as discussed above.

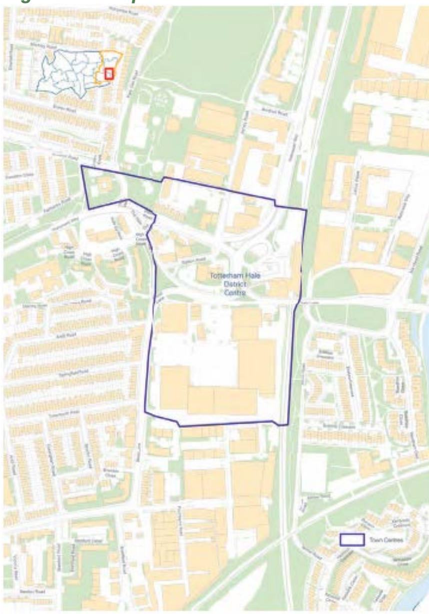
2.24 The TAAP forms a significant and important component of the regeneration strategy for Tottenham which establishes the local spatial planning framework for the area, giving detailed expression to the overall growth objectives for Tottenham as contained in the adopted Local Plan. It seeks to realise the significant potential for urban renewal and intensification, particularly within Seven Sisters, Tottenham Green, Tottenham Hale and Northumberland Park.

2.25 The TAAP remains an emerging policy document, with the council consulting on a pre-submission draft TAAP between January and March 2016. Specific proposals include:

- Establishing a new district centre in Tottenham Hale to take advantage of huge infrastructure improvements like Crossrail 2 and a new Tube, rail and bus station – with a range of new retail, leisure and business spaces;
- A comprehensive plan to bring long-term regeneration to Northumberland Park and High Road West, with options for thousands of new homes, better local businesses and shops, improved open space and transport links, and improved health and educational facilities;
- Bringing the historic character of Bruce Grove to life with better space for pedestrians, more open space and policies that encourage more cafes and restaurants on the high street;
- Improving Seven Sisters as the gateway to Tottenham, with support for small, independent traders and a local market while encouraging new retail, leisure and community facilities.

2.26 The emerging TAAP provides area-wide and site specific policies. These policies build on and supplement existing Local Plan policies and have been nuanced to reflect the regeneration vision for Tottenham. Although Tottenham Hale currently lacks a town centre designation, the AAP identifies THRP as acting as a major commercial focal point in the area. Policy AAP1 seeks to ensure all development proposals submitted to the Council 'proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved' and states that '*the Council will direct development to Growth Areas and Areas of Change, and will support planning applications which accord to the delivery of Neighbourhood Objectives and site requirements*'.

Figure 2.1: Proposed Site Allocation



Source: Tottenham Area Action Plan (Proposed Submission, January 2016, Figure 5.15)

2.27 Site Specific Allocation Policy TH1 (Tottenham Hale) allocates THRP as part of the new district centre along adjoining sites, with new road layout, creating town centre uses, with residential and commercial uses above. A number of other sites are also allocated as forming part of the new district centre, including 29-51 The Hale, Station Road (Area A) for the comprehensive redevelopment of the Southern end of Ashley Road; 1-21 Hale Road (Area B) for district centre uses including a hotel use with residential and enhanced public realm; and 1-25 Ashley Road (Area C) for comprehensive redevelopment creating new district centre uses with residential and enhanced public realm.

Summary

- **The National Planning Policy Framework (NPPF) was adopted in March 2012 and replaces the suite of national Planning Policy Statements, including PPS4. The NPPF maintains the general thrust of PPS4 and advocates a 'town centres first' approach. It requires planning policies to positively promote competitive town centre environments and manage the growth of centres over the plan period.**
- **The London Plan seeks to co-ordinate development within the network of town centres to ensure that they provide the main foci for commercial development, are conveniently accessible, and provide a sense of place and local identity. The Upper Lee Valley is identified as an Opportunity Area, and includes Tottenham Hale — a strategic growth area in Haringey.**
- **In accordance with Local Plan Policy SP10, the Council will promote and encourage development of retail, office, community, leisure, entertainment facilities, recreation uses, arts and cultural activities within its town centres according to the borough's town centre hierarchy. It is noted, however, that it is possible to identify potential future changes to the borough's town centres over the life of the Local Plan, including potential new centres. Given the existing scale, role and function and mixed use development which is currently taking place at Tottenham Hale, the Local Plan identifies the case for Tottenham Hale to be designated as a new District Centre.**
- **This Local Plan objective has been carried forward into the Council's suite of other planning policy documents, including the emerging Tottenham Area Action Plan (TAAP). In accordance with proposed Site Allocation Policy TH1 (Tottenham Hale), a new district centre will be created at Tottenham Hale, in place of the current Tottenham Hale Retail Park. The recent Tottenham Hale District Centre Framework (THDCF) provides further guidance on the type of redevelopment which is expected to come forward, and this has informed our assessment of impact which follows later in this report.**

3 STUDY AREA AND CONTEXT

3.1 In this section we first consider the role, function and current retail provision at Tottenham Hale Retail Park (THRP). We then proceed to review the offer of the surrounding district centres within the Tottenham Area Action Plan (TAAP) area, i.e. Bruce Grove / Tottenham High Road and West Green Road / Seven Sisters. Finally, we provide an overview of the main centres in the wider catchment area which have been found (based on the findings of the Council's most recent retail evidence base study, as summarised in the previous section) to exert the strongest influence on comparison goods shopping patterns of residents in the Tottenham area.

Tottenham Hale Retail Park

3.2 Tottenham Hale Retail Park (THRP) is a retail warehouse-led development of approximately 17,300 sq.m[1] of retail floorspace, on a 4.5ha site adjacent to Tottenham Hale rail and bus station. The site is bounded by Ferry Lane to the north, Broad Lane to the west, industrial uses to the south, and the London – Cambridge railway line to the east. As the previous section has set out, the retail park does not form part of the existing hierarchy of centres in the Borough and is therefore, at the current time, an 'out-of-centre' development in planning terms. The development offers 550 car parking spaces, with three hours free car parking for customers.

3.3 The retail park benefits from an unusually strong level of public transport accessibility (PTAL 6a) for developments of this nature — it is located adjacent to Tottenham Hale Underground / Rail station, which provides direct connections to central London, Finsbury Park and Walthamstow via the Victoria Line, and Liverpool Street, Stratford, Cheshunt and Stansted Airport, as well as local north London / Hertfordshire stations, via the national rail network. It is proposed that Crossrail 2 will, if developed, also stop at Tottenham Hale.

3.4 Tottenham Hale Bus Station is located immediately adjacent to the rail interchange and is served by a number of bus routes, including several routes which link the retail park to existing district centres in the TAAP area. Locations served by the local bus network include:

- **Route 41:** Archway via Seven Sisters, West Green Road, Turnpike Lane, Hornsey
- **Route 76:** central London via Seven Sisters, Stamford Hill, Stoke Newington
- **Route 123 (eastbound):** Redbridge via Blackhorse Road, Wood Street, South Woodford, Gants Hill
- **Route 123 (westbound):** Wood Green via Turnpike Lane, Tottenham High Road
- **Route 192:** Enfield via Northumberland Park, Edmonton Green, Bush Hill Park
- **Route 230 (eastbound):** Wood Street via Whipps Cross, Bakers Arms, Walthamstow, Blackhorse Road
- **Route 230 (westbound):** Wood Green via Turnpike Lane
- **Route W4:** Wood Green via Tottenham High Road, Turnpike Lane

3.5 It is this strong level of accessibility by public transport which is a key rationale behind the Council's aspirations to develop the proposed district centre. Despite the high level of public transport accessibility, it is apparent that the retail park also draws a large number of car-based trips; as noted above, the development has 550 car parking spaces and our visits to the retail park have identified these as being well used.

3.6 The Haringey Retail Study (HRTCS) estimates that THRP contains 17,316 sq.m of net sales floorspace; the majority of which is used for the sale of comparison (non-food) goods. We are not aware of any subsequent developments/extensions to existing floorspace at THRP subsequent to completion of the HRTCS which will have altered this figure. The HRTCS identifies the occupiers and floorspace of individual units at THRP, which we have reviewed and updated as set out in **Table 3.1.**

Table 3.1: Current Operator Mix and Floorspace, Tottenham Hale Retail Park

Operator (HRTCS)	Operator (2015)	Unit size (sq.m net)	Bulky goods (if comparison goods)	Non-bulky goods (if comparison goods)
Comparison goods				
Currys	Currys PC World	1,712	✓	
PC World	TK Maxx	1,403		
Carpetright	Carpetright	696	✓	
Argos	Argos	146	✓	
Asda Living	Asda Living	2,922	✓	
Poundworld	Poundworld	300		✓
Comet	Wilko	1,303		✓
Halfords	Halfords	1,122	✓	
B&Q	B&Q	3,828	✓	
Staples	Staples	1,113	✓	
JD	JD	474		✓
Boots	Boots	363		✓
Next	Next	1,119		✓
Carphone W'house	Carphone W'house	120		✓
Maplin	Maplin	480		✓
Orange	EE	114		✓
O2	O2	111		✓

[1] Source: Haringey Retail Study, 2013, Appendix 2

Operator (HRTCS)	Operator (2015)	Unit size (sq.m net)	Bulky goods (if comparison goods)	Non-bulky goods (if comparison goods)
Total:		17,316		
Convenience goods				
Lidl	Lidl	996	-	-
-	Greggs	n/a	-	-
Food & Beverage				
Burger King, Costa, KFC, Pizza Hut, Subway				

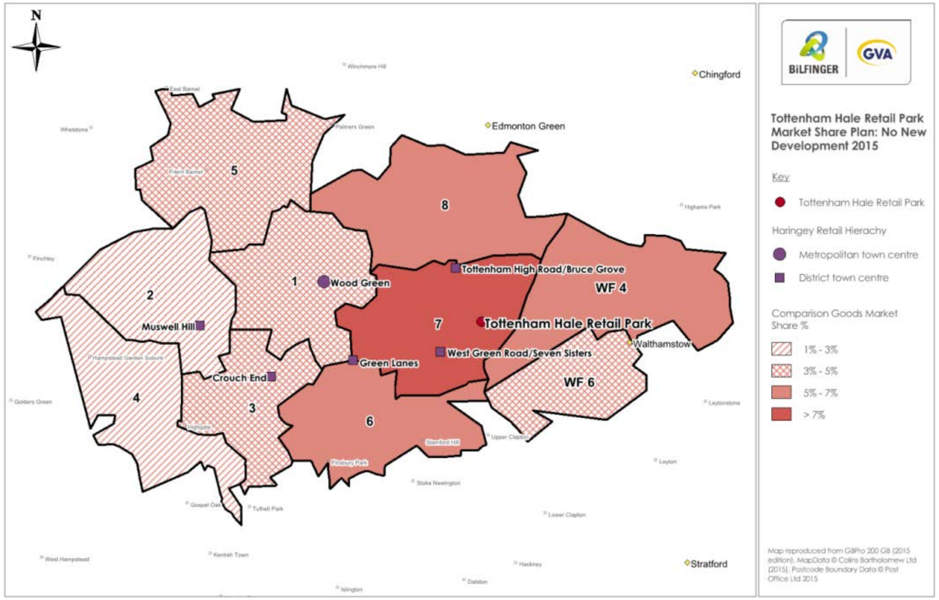
Source: Haringey Retail Study, 2013 (Appendix 2, Tables 1 and 2) / GVA research

3.7 Based on the above floorspace figures, the retail mix at THRP currently comprises:

- 12,942 sq.m of 'bulky goods' comparison goods floorspace;
- 4,374 sq.m of 'high street'/'non-bulky' comparison goods floorspace; and
- 996 sq.m of convenience goods supermarket floorspace

3.8 The findings of the household survey undertaken in support of the HRTCS confirm that THRP exerts a trade draw from across LB Haringey, as well as parts of London Borough of Waltham Forest. **Figure 3.1**[2] shows and **Table 3.2** show the current 'market shares' of THRP from each of the eight survey zones which comprise the HRTCS study area we have used for the basis of our assessment, as well as the market shares drawn from equivalent survey zones in LB Waltham Forest. It can be seen that THRP's principle catchment area is HRTCS zone 7 (Bruce Grove), from which a market share of 16% is drawn. A 7% market share is drawn from HRTCS zone 8, and a 6% market share from HRTCS zone 6. A market share of between 1% and 5% is drawn from each of the five remaining HRTCS survey zones, as well as two zones in Waltham Forest.

Figure 3.1: Current comparison goods market shares, Tottenham Hale Retail Park



Source: Table 4, Appendix VII (market shares derived from HRTCS household survey and LB Waltham Forest Retail & Town Centre Study household survey, GVA, 2016). See Appendix III for larger version.

Table 3.2: Current comparison goods market shares, Tottenham Hale Retail Park

LB Haringey			
Zone 1	Zone 2	Zone 3	Zone 4
3.1%	1.0%	4.1%	2.2%
Zone 5	Zone 6	Zone 7	Zone 8
3.2%	6.1%	16.2%	6.9%
LB Waltham Forest			
WF Zone 4		WF Zone 6	
5.2%		3.1%	

Source: Table 4, Appendix VII (market shares derived from HRTCS household survey) / LB Waltham Forest Retail & Town Centre Study (GVA, 2016)

[2] A larger version of Figure 2.1 is reproduced as Appendix III (see 'Plans & Appendices')

The Network of Centres

3.9 In this section we set out a summary of the wider catchment context, providing a high-level overview of the network of centres in Haringey and surrounding Boroughs, and an analysis of where residents of the Tottenham area are currently travelling to for comparison and convenience goods shopping. The principal centres which draw trade from Tottenham residents are Wood Green, Brent Cross, Enfield and Edmonton Green. Below we set out an evaluation of the role and function of the existing centres in the TAAP area, and these competing destinations, considering their diversity of uses, quality of retail offer, role and function and operator mix. In undertaking our analysis we draw on the findings of the HRTCS and equivalent retail evidence base studies for neighbouring authorities, published third party information (for example Experian Goad reports, which contain information on diversity of uses and floorspace, and IGD, which contains information on supermarket floorspace), as well as our own observations of the centres through site visits undertaken in September 2015.

3.10 **Appendix I** illustrates the hierarchy of centres in LB Haringey, as defined by the Council's adopted Local Plan (2013). The Council's hierarchy includes two centres which fall within the TAAP area – Bruce Grove/Tottenham High Road and West Green Road/Seven Sisters; both are classified as district centres in the Local Plan, and in the London Plan. Wood Green is the highest-order centre in LB Haringey, classified as a 'Metropolitan' centre, and other district centres in LB Haringey (outside the TAAP area) are located at Muswell Hill, Crouch End and Green Lanes. As set out above, THRP is not allocated in the Council's existing network of centres.

3.11 The HRTCS also identifies more moderate flows of comparison goods expenditure to a further range of centres, including Stratford, Lakeside, Walthamstow and Chingford. The levels of expenditure 'leakage' to these centres is relatively modest and therefore we do not consider it necessary to provide a detailed assessment of their role and function. In addition, there is significant expenditure leakage to Central London, which clearly has an exceptionally strong comparison goods retail shopping function, containing flagship outlets for many 'high street' retailers and providing a range and depth of comparison goods shopping which is on a different level to that of other competing centres. Central London is easily accessible for many residents in the Tottenham area on account of direct links on the Victoria Line from Tottenham Hale and Seven Sisters stations.

3.12 **Table 3.3** presents a summary of the role and function of the centres in the TAAP area and the key competing centres, showing their London Plan classification, the Venuescore retail ranking and 'market position' (which assesses the overall quality of the retail offer in a centre, and the amount of comparison goods retail floorspace within the centre.

Table 3.3: Network of competing centres within and surrounding Tottenham AAP area

	London Plan classification	Venuescore market position	Venuescore ranking (2014)	Amount of comparison goods retail floorspace (sq.m net)
Bruce Grove / Tottenham High Road	District	Lower	1,257	4,376
West Green Road / Seven Sisters	District	-	-	2,828
Central London / West End	International	Upscale	9[a]	-
Stratford	Metropolitan	Upper Middle	30[b]	115,634
Lakeside	n/a	Middle	52	38,889
Brent Cross	Regional	Upper Middle	102	53,141
Wood Green	Metropolitan	Middle	110	40,705
Enfield	Major	Middle	185	27,440
Walthamstow	Major	Lower Middle	220	76,400
Muswell Hill	District	Upper Middle	422	6,405
Edmonton Green	District	Lower	503[c]	22,260[e]
Chingford	District	Lower Middle	709[d]	21,600

Source: London Plan, LB Haringey Local Plan, Venuescore (2014), LB Haringey Retail Study, LB Waltham Forest Retail & Town Centre Study, Experian Goad. Notes: [a] Venuescore ranking for Oxford Street [b] Venuescore ranking for Westfield Stratford City [c] Venuescore ranking for Lower Edmonton [d] Venuescore ranking for South Chingford [e] Experian Goad figure for Edmonton Green also includes Angel Edmonton

Bruce Grove / Tottenham High Road (district centre)

3.13 Bruce Grove/Tottenham High Road is designated as a District Centre in both the London Plan and Haringey's adopted Local Plan. The emerging TAAP describes Bruce Grove as:

> *'a focal point for retail on the High Road, comprising a long linear retail pitch of mainly independent retailers trading from 'traditional' high street units, comprising small ground floor sales areas with residential or office uses on one or two floors above. These units provide predominantly service and convenience retail including: food takeaways, estate agents, bookmakers and banks, charity shops and small convenience/newsagents. In addition, a limited number of multiple operators such as Peacocks, Santander and McDonalds are located in this area.*
>
> *A different retail offer is provided along the eastern end of Bruce Grove. There are two set back retail areas in Bruce Grove - one in front of Bruce Grove station and the other a fruit, vegetable and fish market at Holcombe Road'*

3.14 In October 2011, Nathaniel Lichfield & Partners were appointed by LB Haringey to undertake a town centre health check of Bruce Grove/Tottenham High Road. The conclusions from this study found that the centre had a reasonable mix of uses when compared to the national average, but the centre had a proportion of comparison retail units which was substantially below the national average, whilst the proportion of convenience retailers were significantly above the national average. The proportion of A3/A5 units and A1 services in Bruce Grove/Tottenham High Road were also above the national averages.

3.15 The Experian Goad report for Bruce Grove/Tottenham High Road (January 2014) identifies a total of 24,400 sq.m of ground floor floorspace for retail and service units (retail, leisure, and financial and business services combined), comprising 105 units[3]. The convenience goods offer in Bruce Grove/Tottenham High Road is anchored by small Aldi, Iceland and Asda supermarkets. All three supermarkets offer a good range of convenience goods items as well as a small range of non-food goods. This main convenience offer is supplemented by a butcher, several grocers and delicatessens, a health foods store and multiple newsagents. Overall, the convenience goods provision in the district centre remains above the UK average (difference of +3.9% to the UK average).

3.16 There are relatively few national comparison retailers which are located within the district centre, with the vast majority of comparison units being occupied by smaller independent traders, particularly towards the Bruce Grove end of the centre. The Experian Goad report confirms that comparison goods representation remains below the UK average (difference of -16.1% to the UK average). This confirms that the comparison goods function of the district centre is relatively limited – however the presence of retailers such as Poundland, Superdrug, Peacocks and Shoe Zone does allow for some day to day comparison goods shopping needs to be met. Generally speaking, the quality of the retail offer is relatively downmarket, as reflected in Venuescore's classification of the market position of the centre as 'lower'.

3.17 The centre has a strong 'leisure services' offer, with total representation +8.8% above the UK average. However, this above-average representation is skewed by a particularly high proportion of fast food and take aways, which account for 10.5% of all units in the centre, almost double the UK average of 5.7%. The number of cafes is also slightly above the UK average (6.7% of all uses compared to a UK average of 4.3%), however there is under-representation in 'evening economy' uses such as restaurants and bars relative to their respective UK averages, and qualitatively there is clear scope for improvement of facilities of this nature in the centre. The high number of take-aways in the centre is likely to be, at least in part, a reflection of the presence of White Hart Lane football ground adjacent to the Bruce Grove end of the district centre, enabling these facilities to capture additional footfall and trade on match days. There is also a high provision of health and beauty retail services (this includes hairdressers, beauty salons and so on), a number of high street national banks including Lloyds TSB, Nationwide, HSBC and Halifax, and facilities such as doctors and dentist surgeries and laundrettes.

[3] There are differences in the policy boundary of Bruce Grove/Tottenham High Road as defined by LB Haringey, and that used by Experian Goad. The Experian Goad survey of the centre includes units between the junctions of the High Road with Pembury Road/Scotland Green (to the north) and Drapers Road to the south. It also excludes units on Bruce Grove west of the railway line.

3.18 The Experian Goad report for Bruce Grove/Tottenham High Road identifies a total of 13 vacant units, equating to a vacancy rate of 12.4%. This is slightly above the current national average of 11.3%. The Goad category report shows that 21.3% of the floorspace in Bruce Grove/Tottenham High Road is vacant compared to a national average of 9.2%, although this high level of vacant floorspace can partly be attributed to a number of units in the district centre undergoing redevelopment at the time of the Experian Goad survey. The majority of the vacant units are concentrated towards the peripheral edge of the centres.

3.19 Bruce Grove/Tottenham High Road therefore has an important role and function as a convenience goods and services centre, and whilst its comparison goods offer is less pronounced (which is reflective of its role and function as a district centre), on balance we consider that its retail and services mix is well suited to meeting local shopping needs, and the centre accordingly displays generally positive levels of vitality and viability.

West Green Road / Seven Sisters (district centre)

3.20 West Green Road / Seven Sisters is also defined as a District Centre in both the London Plan and Haringey's adopted Local Plan. It covers an extensive area stretching from Seven Sisters station to the south to Tottenham Green to the north, also including the bustling local independent hub of West Green Road. The emerging TAAP sets the context of the area as follows:

> *'Tottenham Green and Seven Sisters are at the southern end of the Tottenham High Road, and Seven Sisters is the sole London Underground station on the High Road. As such it acts as a gateway to Tottenham from many parts of London. Seven Sisters hosts a wide range of multicultural retail premises, including the Seven Sisters Market, which is the anchor development for the retail offer at Seven Sisters, with provision extending westwards down West Green Road. The market is predominantly South American in character with stalls selling goods from countries such as Colombia, Peru, and Brazil.*
>
> *West Green Road provides a thriving local parade of small high street units (with generally poorer quality residential accommodation located above) occupied almost entirely by local independent traders. The majority of the offer is targeted at the Caribbean community and based on convenience and service retail comprising barbers shops/hairdressing salons, small food stores/ newsagents, specialist butchers, greengrocers and money exchange/ travel agents.*
>
> *North of Seven Sisters tube station lies Tottenham Green which is a key focus for civic life in Tottenham. Assets in this area include the former Tottenham Town Hall, Bernie Grant Arts Centre, Marcus Garvey Library, and further north, Tottenham Police Station and Tottenham Chances.'*

3.21 The 2011 NLP Study found that the proportion of comparison retail units in the district centre was substantially below the national average, while the proportion of convenience retailers and A1 services were both significantly above the national average, suggesting that the centre performs a comparable role and function to Bruce Grove/Tottenham High Road. The proportion of A2 units was also above the national average, however there were a similar proportion of A3/A5 units to the national average. At the time of the NLP study, the proportion of vacant retail/service units was lower than the national average.

3.22 According to the most recent data, the Experian Goad category report for West Green Road/Seven Sisters (July 2014) identifies a total of 21,900 sq.m of ground floor floorspace for retail and service units, comprising 184 units. A Sainsbury's Local (West Green Road) and Tesco supermarket (Tottenham High Road) anchor the district centre. This convenience offer is supplemented by several bakers and confectioners, butchers, grocers and delicatessens, fishmongers, a health foods store, off licenses and newsagents. Overall, the convenience goods provision is significantly above the national average (difference of +13.8% to the UK average), suggesting that the convenience goods offer in West Green Road/Seven Sisters is a particularly important component to the overall role and function of the centre (although there are considerable variances in the quality of the convenience retail offer).

3.23 There are no national comparison retailers of note, with the vast majority of units being occupied by independent traders which offer a limited range and variety of comparison goods. The main retailer representation present in the district centre includes ladies wear and accessories, newsagents and stationers, carpets and flooring, as well as furniture. The comparison goods average for the centre is significantly below the national average (difference of -17.1% to the UK average). Whilst there is a limited range of comparison goods retailing which allows day-to-day shopping needs to be met, we would expect most residents to travel to other nearby centres to undertake their higher-order comparison goods shopping (e.g. clothing, electrical items and so on).

3.24 West Green Road/Seven Sisters has what could be considered a reasonable range of service uses, with particularly high retailer representation from health and beauty outlets (such as hairdressers and beauty salons) and fast food takeaways. There are lower proportions of cafés, restaurants and public houses than the national average. Overall, there is a variance of +4.1% relative to the UK average, which suggests that the service provision in the centre is adequate and able to meet the day to day needs of local residents.

3.25 The Experian Goad report for the centre identifies a total of 18 vacant units in the district centre, equating to a vacancy rate of 9.8%. This is below the current UK average of 11.3%. The Experian Goad report shows that 6.8% of the floorspace in the district centre is vacant compared to a national average of 9.2%. At the time of the site visit, there did not appear to be any significant concentrations of vacant units. Notwithstanding its more limited comparison goods function, the centre therefore appears to be performing well.

Brent Cross (regional centre)

3.26 Brent Cross is identified as a Regional Shopping Centre in the London Plan, but not a town centre. Brent Cross/Cricklewood is identified in the London Plan as an Opportunity Area, which is suitable for redevelopment as a town centre, The Experian Goad report for Brent Cross(June 2015) identifies a total of 60,300 sq.m floorspace for retail and service units, comprising 135 units.

3.27 Brent Cross shopping centre has an extensive selection of comparison goods shops, including particularly strong representation from fashion retailers, which is a key reason the centre draws trade from a wide area. There is a range of mostly multiple shops selling a variety of high and lower order comparison goods. Within Brent Cross shopping centre there are two department stores – Marks & Spencer and John Lewis, which anchor the centre. The average comparison goods provision is significantly higher than the national average (difference of +33.0% against the UK average) confirming the comparison goods function of the centre is strong. Other comparison goods retailers of note include All Saints, Banana Republic, Hugo Boss, Jigsaw, Miss Selfridge, Levi's, H&M, JD, Gap, Topman and Topshop. The quality of the comparison goods retail offer at Brent Cross is particularly strong, reflected in Venuescore's classification of the centre as having an 'upper middle' market position.

3.28 Waitrose anchors the convenience goods offer in the shopping centre; this convenience offer is supplemented by seven several bakers and confectioners. Overall, the convenience goods provision is slightly below the national average (difference of -1.1% compared to the UK average) which is to be expected given its role as a purpose built shopping centre.

3.29 The centre has a limited range of service uses, which is significantly below the national average (difference of -26.9% to UK average). There is particularly high retailer representation from cafés and restaurants, as is common in purpose-built centres of this nature as they assist in extending 'dwell time' and making the centre a 'destination'. The Experian Goad report for Brent Cross identifies a total of nine vacant units, equating to a vacancy rate of 6.7%, well below the current UK average of 11.4%. The Experian Goad report shows that 1.8% of the floorspace in Brent Cross is vacant, compared to a UK average of 9.2%. It is clear that Brent Cross shopping centre is performing well.

3.30 In December 2005 the Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework was adopted as Supplementary Planning Guidance. This Development Framework was produced in collaboration with the Mayor and the Greater London Authority, landowners and developers in order to guide and inform the design and delivery of the development with the aim of achieving high quality comprehensive redevelopment of the area around a new sustainable mixed use town centre spanning the North Circular Road.

3.31 In 2010, the Brent Cross Cricklewood Development Partners secured a planning permission for a £4bn masterplan to create a new town centre including 7,500 homes, 27,000 jobs, three re-built schools, new parks and community facilities, an additional train station on the Midland Mainline, and major road and public transport improvements. In October 2013 the Development Partners submitted a Section 73 application to make changes to conditions attached to the 2010 Permission. A new permission was granted in July 2014, and the Reserved Matters applications for detailed works of the first phase of the Brent Cross Cricklewood regeneration have now been approved.

3.32 Brent Cross Shopping Centre will be the focus of the new town centre. It will have a wider range of shops alongside a new evening entertainment offer to provide the area with a night time economy with a new cinema, dining options and a network of covered streets and spaces. Overall, the proposed development will deliver in the region of 55,000 sq.m net additional comparison goods floorspace.

Wood Green (metropolitan centre)

3.33 Wood Green is located centrally within LB Haringey and is defined as a Metropolitan Centre in both the London Plan and Haringey's adopted Local Plan. It is the highest order comparison shopping destination within the Borough and evidence from the 2011 NLP study confirms that it exerts a considerable influence on the shopping patterns from across the Borough, including the Tottenham AAP area. The centre is predominantly linear, stretching along the High Road from the junction with Turnpike Lane in the south to the junction with Bounds Green Road in the north. The centre includes The Mall Wood Green (formerly known as Wood Green Shopping City), a shopping centre which straddles the High Road and provides a focus for major multiple retailers located in the centre.

3.34 NLP identified that the proportion of comparison retail units was significantly higher than the national average and convenience retail was slightly above. The proportion of services were slightly below the national average, and positively the proportion of vacant units at the time of the study was significantly below the national average.

3.35 The Experian Goad report for Wood Green (July 2014) identifies a total of 110,900 sq.m of ground floor floorspace retail and service units, comprising 372 units, confirming that the centre is significantly larger than provision in the centres within the TAAP area. The centre is well served by food stores: a large Morrisons and Sainsbury's supermarket (on the High Road) anchor the convenience offer of the centre, along with a Tesco Express is located in the southern part of the centre near Turnpike Lane, an Iceland supermarket on Brook Road and a Lidl within The Mall. This convenience goods offer is supplemented by several grocers and delicatessens, bakers and confectioners, a butcher, health foods stores, and newsagents.

3.36 The comparison goods retail offer of the centre is relatively evenly split between independent and multiple retailers. The centre evidently has a strong comparison goods function, as evidenced by the fact that comparison goods provision remains significantly higher than the national average (difference of +12.3% to the UK average); its strong comparison goods offer is also reflected in its status as a Metropolitan centre. This comparison goods offer is anchored by BHS, Argos, Boots, TK Maxx, Wilkinson, Burton, Dorothy Perkins, H&M, Matalan, New Look Next, Primark, River Island and Topman – the offer is fairly solidly-mid market (as reflected in the Venuescore classification of the centre shown in Table 2.2), but the range of retailer representation in the centre is strong. A branch of Marks & Spencer in the town centre has recently ceased trading.

3.37 The centre also has a strong services offer, which appears to contribute to a significant extent to the wider vitality and viability of the centre. This includes a particularly high retailer representation from health and beauty outlets and fast food takeaways. Whilst there are a number of cafés, restaurants and public houses in the centre, representation is below the national average, and there is a notably poor range of family dining restaurants. The leisure offer of the centre is further enhanced by the provision of two cinemas, operated by Vue and Cineworld.

3.38 The Experian Goad report for Wood Green identifies a total of 20 vacant units, equating to a vacancy rate of 5.4%, well below the current national average of 11.3%. The Experian Goad report shows that 2.6% of the floorspace in Wood Green is vacant, compared to a national average of 9.2%.

Enfield (major centre)

3.39 Enfield town centre is the main shopping and commercial centre in LB Enfield and is designated as a major centre in both the London Plan and Enfield's adopted Local Plan. The Experian Goad report for Enfield (April 2014) identifies a total of 56,900 sq.m of ground floor floorspace for retail and service units, comprising 232 units. Waitrose and Tesco supermarkets anchor the convenience goods offer in town centre; this convenience offer is supplemented by several bakers and confectioners, grocers and delicatessens, a health foods store and newsagents. There is also a food hall located in the Marks and Spencer. Overall, the convenience goods provision is slightly below the national average (difference of -1.6% compared to the UK average).

3.40 Enfield town centre has a reasonable selection of comparison goods shops, with a good selection of multiples, located mainly within the Palace Gardens shopping centre, and two department stores – Marks & Spencer and Pearsons, an independent department store. Comparison goods provision is higher than the national average (difference of +8.2% against the UK average); other comparison goods retailers of note include Argos, Boots, TK Maxx, WH Smith, Burton, Dorothy Perkins, H&M, New Look, Next, River Island, Topman and Topshop; generally the range of key national multiple retailers in Enfield is similar to that of Wood Green, although in most cases the stores trade from smaller units.

3.41 The centre has a reasonable range of service uses, although this is below the national average (variance of -1.4% to UK average). There is particularly high retailer representation from cafés, property services (e.g. estate agents) and banks. The Experian Goad report for Enfield identifies a total of 15 vacant units, equating to a vacancy rate of 6.5%, well below the current UK average of 11.3%. The Experian Goad report shows that 3.7% of the floorspace in Enfield is vacant, compared to a UK average of 9.2%. It is clear that Enfield town centre is currently performing generally well and no major areas of concern in respect of its vitality and viability have been identified.

Edmonton Green (district centre)

3.42 Edmonton Green is designated as a District Centre in the London Plan and Enfield Local Plan, and therefore has a more limited offer than the other key competing centres outside LB Haringey discussed above. However its proximity to the northern part of the TAAP area means there is scope for the centre to influence local shopping patterns. The centre has a value/discount-orientated offer, and is anchored by a large Asda supermarket, alongside a small branch of Lidl. Key comparison goods retailers Argos, Superdrug, JD and Wilko, alongside a raft of discount retailers such as Poundland, Poundworld, Home Bargains and 99p Stores. A Tesco Metro store in the centre has recently ceased trading, although there is more than sufficient alternative choice for users of the centre in respect of convenience goods provision. The centre also includes a leisure centre, primary care centre, library and Travelodge hotel. The most recent Experian Goad report for the centre identifies a vacancy rate of 6.7%, although it should be noted that this figure also covers the nearby retail facilities at Angel Edmonton.

Summary of performance of network of centres

3.43 We have undertaken an assessment of the role and function of the network of centres within the TAAP area, as well as those centres which the HRTCS has identified as being the key competing destinations, particularly for comparison (non-food) goods shopping. Our assessment has demonstrated that:

- Tottenham Hale Retail Park benefits from strong levels of accessibility from a range of public transport modes, which ensure it is well positioned to be reconfigured as a district centre. The current retail mix at the Retail Park is split between 'mainstream' comparison goods retailers such as Next, Wilko, Boots and Poundworld and 'bulky goods' comparison goods retail operators such as Currys/PC World, Asda Living and B&Q. These are supported by a more limited convenience and retail services offer, which includes a Lidl foodstore. Evidence from the HRTCS shows that THRP draws trade from across LB Haringey, and its catchment also extends into parts of LB Waltham Forest.
- Bruce Grove / Tottenham High Road and West Green Road / Seven Sisters district centres are currently performing well as convenience goods and retail services-based locations, with an emphasis on meeting local residents' day to day shopping needs. Neither district centre has a particularly pronounced comparison goods shopping role, although there is some multiple retailer representation in Bruce Grove / Tottenham High Road in the vicinity of Bruce Grove station.
- Brent Cross is identified as a Regional Shopping Centre in the London Plan. This purpose built shopping centre has an extensive selection of comparison goods shops in particular. Within Brent Cross shopping centre, including two department stores – Marks & Spencer and John Lewis which anchor the centre. There are significant proposals for the redevelopment of Brent Cross and neighbouring Cricklewood to form a new town centre and it is expected that this will include an uplift of comparison goods floorspace in the region of 55,000 sq.m net.
- Wood Green is a higher-order Metropolitan centre which trades successfully as a mid-market comparison goods shopping destination and exerts significant influence over comparison goods shopping (as well as, to a lesser extent, convenience goods shopping) from across the Borough. Whilst the recent closure of the Marks & Spencer store is a short-term setback for the centre, it is clear that overall the centre benefits from strong levels of vitality and viability, and can be considered a well-performing centre.
- Enfield exerts less of an influence but nevertheless is a strongly performing town centre with a good range of key anchor stores, including two department stores, whilst Edmonton Green contains a more value-orientated retail offer but within this context appears to be performing well.

4 COMPARISON GOODS IMPACT ASSESSMENT

4.1 In this section we set out an assessment of the implications of the proposed comparison goods (non-food) floorspace at Tottenham Hale District Centre (THDC) on the existing network of centres within and surrounding the Tottenham Area Action Plan (TAAP) area. The impact assessment tests the scenario that the current retail offer at Tottenham Hale Retail Park will be refocused as part of its transformation to a district centre, in the following ways:

- A reprofiling of the offer away from 'bulky goods' comparison goods retail to 'high street' comparison goods retail;
- A rebalance of the mix of uses away from being comparison goods focussed to including a greater amount of convenience goods floorspace, commercial leisure and other 'town centre' uses; and
- As a consequence, the amount of comparison goods floorspace reducing in the district centre relative to the amount currently trading at THRP.

4.2 In this section we also consider the 'cumulative' impacts arising from this development alongside the proposals for new retail floorspace elsewhere within the TAAP area, most particularly the planned development at High Road West (HRW), details of which are set out in Section 1 of this report. Our assessment below should be read in conjunction with the comparison goods impact tabulations set out at Appendix VII. We have tested the impact of the potential floorspace at THDC and the other 'commitments' at 2020 and 2025, reflecting best practice methodology set out at paragraph 26 of the NPPF.

Methodology

4.3 In the absence of a new, bespoke household telephone survey, and in order to inform our understanding of current patterns of convenience (food) and comparison (non-food) shopping in the Tottenham AAP area and the likely trade draw implications of the new district centre development, we have drawn on the results of the Council's most recent Borough-wide survey of shopping patterns, which was carried out by NEMS Market Research ('NEMS') in September 2012 in support of the HRTCS. This survey represents the most up to date evidence on shopping patterns currently available which covers the TAAP area in its entirety.

4.4 We have used the raw survey data to establish the convenience and comparison goods market shares for existing centres and foodstores which currently draw trade generated within the survey area. It is important to note that some of the destinations listed are on the edge of, or outside of, the survey area boundary and therefore the survey has not captured the full extent of the likely turnover of these centres and stores. This is an important consideration in judging the extent to which the impact on these centres/foodstores can be considered 'significant' (paragraph 26 of the NPPF makes it clear that developments not within a centre which have a 'significant adverse' impact against trade/turnover in existing town centres should not be supported).

Population and expenditure

4.5 As noted above, we have adopted the same survey area as used by the HRTCS. This is a Borough-wide study area stretching from Wood Green / Green Lanes in the west to Tottenham in the east. The HRTCS sub-divided the survey area into eight zones in order for localised shopping patterns to be accurately captured, and for consistency we adopt the same zonal splits. Tottenham Hale falls within zone 7 of the HRTCS survey area, which also covers Seven Sisters and Bruce Grove. Northumberland Park and the northern end of Tottenham High Road falls within zone 8.

4.6 We have updated the population estimates for the survey area from those used in the HRTCS, as 2011 Census-based data is now available. The most recent data from Experian's Micromarketer shows the population in the survey area will increase from 483,192 in 2015 to 543,393 in 2025, an increase of 60,201 persons. These population forecasts inform our 'baseline' impact assessments.

4.7 Reflecting the significant housing growth which is expected to come forward, particularly in the Northumberland Park and Tottenham Hale areas, we also undertake a 'scenario test' which builds in a higher level of population growth than that forecast by Experian. For this scenario, we use annualised housing growth trajectory information provided by LB Haringey, and covert this to population growth using a ratio of 2.3 persons per household. This additional population growth will, in turn, will increase locally available expenditure, and therefore reduce impacts arising as a consequence of the new floorspace.

4.8 By applying the population growth forecasts to the most recent up-to-date per capita spend[4] available to residents in the survey area, it can be seen that, having made allowance for deductions to 'special forms of trading' such as online shopping (as set out in Experian Retail Planner 13 (October 2015)):

- total available comparison goods spending in the survey area increases by £615.9m between 2015 and 2025 under the Experian 'baseline' scenario;
- total available comparison goods spending in the survey area increases by £657.8m between 2015 and 2025 under the LB Haringey population growth scenario.

Floorspace estimates

4.9 We have derived floorspace figures from existing centres and stores from the HRTCS (Appendix 2). The floorspace proposed by committed/pipeline schemes has been either also derived from the HRTCS, or from planning application supporting documents. Where necessary, we have made professional judgements on the quantum of convenience or comparison goods floorspace which is likely to come forward within a committed/pipeline scheme.

[4] We assume that per capita spend on comparison and convenience goods will increase in line with expenditure growth forecasts set out at Figure 1a of Experian Retail Planner 13, October 2015

Tottenham Hale District Centre floorspace

4.10 The DCF identifies that 214,174 sq.ft / 19,897 sq.m of new retail floorspace could be accommodated as part of a redeveloped THDC. For the purposes of our impact assessment, and through discussions with the Council, we have adopted the following floorspace assumptions (**Table 4.1**):

Table 4.1: Tottenham Hale District Centre floorspace assumptions

	Proportion of total (%)	Gross area (sq.m)	Net sales area (sq.m)*
Comparison goods floorspace	60%	11,938	9,551
Convenience goods floorspace	20%	3,979	3,184
Retail services and commercial leisure	20%	3,979	3,184

Source: Table 8a, Appendix VII
*Gross: net ratio of 80% applied

4.11 It is important to note that the overall quantum of retail floorspace at THDC is expected to be reduced compared to the current provision at THRP. The HRTCS identifies that there is a total of 18,312 sq.m of retail floorspace at THRP, split between 17,615 sq.m comparison goods floorspace and 697 sq.m convenience goods floorspace. Based on the parameters tested above, there will therefore be:

- A net reduction in comparison goods floorspace of -8,064 sq.m; and
- A net increase in convenience goods floorspace of +2,487 sq.m.

4.12 Whilst there is expected to be a net reduction in the overall quantum of comparison goods floorspace, as we have set out previously there will be a shift in the type of floorspace from one currently orientated towards 'bulky goods' retailing to one with a greater emphasis on 'high street' retailing. This means that it is likely the development will achieve a greater sales density (turnover per square metre) than the 'bulky goods' retailers at THRP currently achieve; we discuss the implications of this below.

Approach to impact assessment

4.13 To meet the aspirations of the Local Plan to transform THRP into a district centre it will be necessary for a more diverse range of uses to be accommodated on the site. It will therefore need to move away from being an out-of-town, bulky goods-focused retail park, to one which offers a broader range of amenities to better meet the needs of new and existing communities. On this basis, it is appropriate to plan for a reduction in comparison goods floorspace, because the retail and services mix will also incorporate convenience goods, commercial leisure and other 'town centre' uses.

4.14 It is also likely that the role and function of the comparison goods floorspace will change as a consequence of the reconfiguration of the retail park to a district centre. We would expect that a district centre would draw a higher proportion of its trade from a more localised catchment. However, as we have identified previously, there are a number of 'high street' retailers already present at THRP, and therefore the current patterns of trade draw will not be completely altered. It is appropriate to assume that a number of the existing comparison goods retailers trading at THRP will seek to retain a trading presence in the area.

4.15 Based on a typical 'high street' comparison goods sales density (turnover per sq.m) and informed by our professional judgement as to how the proposed floorspace is likely to perform, we have assumed the proposed floorspace will achieve a sales density of £6,000 per sq.m (i.e. greater than a typical 'bulky goods' sales density, which would be in the region of £2,500-£3,00 per sq.m), generating a turnover of £61.7m in 2020, increasing to £66.5m in 2025. When assessed against the current trading performance of THRP, this represents a reduction in turnover of -£49.7m in 2020, and -£69.9m in 2025. Commercially, despite the loss of floorspace, the overall sales density will be higher, and will provide for more uses on the site that provide a stronger economic return.

Assessment of impact

4.16 Our comparison goods impact assessment is set out at Tables 1 to 14 of Appendix VII. Tables 1, 2 and 3 show the population and expenditure growth which is expected to come forward in the survey area, as discussed above.

4.17 Table 4 shows the existing 'market shares' attracted to centres and stores within and surrounding the survey area. The market shares shown are 'composite' figures, derived from the household survey data underpinning the HRTCS, and weighted based on current amounts of spending on different types of comparison goods by residents in the survey area. The list of centres and stores replicates that set out in equivalent tables in the HRTCS.

4.18 Tables 5, 6 and 7 convert the market shares in Table 4 to spending patterns at 2015 (the base year, shown in Table 5), 2020 (Table 6) and 2025 (Table 7). The turnover of the centres is calculated by applying the market shares in Table 4 to the total comparison goods spending available to the survey area for the corresponding year in Table 3.

- Table 5 shows that existing centres in the Tottenham AAP area achieve a combined comparison goods turnover of £99.5m, of which £24.2m is accounted for by Bruce Grove / Tottenham High Road; £7.5m is accounted for by West Green Road / Seven Sisters, and £67.9m is accounted for by THRP. Under a 'no development' scenario, the combined turnover of comparison goods retail facilities in the TAAP area will increase to £121.3m in 2020 (Table 6, Appendix VII) and £148.5m in 2025 (Table 7, Appendix VII).
- Table 5 also shows that Wood Green is the most popular comparison goods shopping destination for residents, drawing £235.3m of spending in 2015, including £92.2m of spending from the 'Tottenham zones' (zones 7 and 8). A further £196.2m is spent in central London, £132.5m is spent in Brent Cross, £65.5m is spent in Enfield, and £37.3m in Edmonton Green (all of which are outside the survey area). Other centres including Stratford, Walthamstow and Chingford attract lower levels of comparison goods shopping spend from residents in the survey area, and these destinations are also shown in Table 5.

4.19 Table 8a shows the floorspace assumptions for the proposed THDC we have used as the basis of our comparison goods impact assessment (as summarised at Table 4.1 above), and Table 8b shows how this floorspace will differ from the current composition of floorspace at THRP.

4.20 Table 9a then shows the turnover of existing floorspace at THRP under a 'no development' scenario, and Table 9b shows the turnover which the proposed THDC could be expected to achieve based on the floorspace split and turnover assumptions set out above, Table 9c shows the difference between the 'no development' turnover and the THDC turnover (as summarised at paragraph 4.14).

Patterns of trade diversion

4.21 Tables 10a and 10b show how much trade diversion is expected to be captured from each of the zones in the survey area at 2020 (Table 10a) and 2025 (Table 10b). Reflecting the fact that THDC is primarily intended to meet the needs of existing and new residential communities in the Tottenham area, we have assumed that 38% of the centre's turnover will be derived from residents in zone 7, and a further 18% from residents in zone 8 (therefore a total of 56% of the turnover of the new floorspace will be drawn from the 'Tottenham zones' in the HRTCS), as well as 8% from residents in zone 6 and 10% from residents in zone 3. The patterns of trade diversions have been derived using our professional judgment, informed by the intended role and function of the proposed new district centre, and the proximity of residents in each of the survey zones to other retail facilities.

4.22 In total, we assume that 74% of the turnover of THDC will be from the survey area; we assume the remaining 26% will be 'inflow' from beyond the survey area. This reflects the current distribution of spending to THRP: evidence from retail evidence base work which Bilfinger GVA have undertaken on behalf of London Borough of Waltham Forest has indicated that there are flows of expenditure to THRP from residents in the Walthamstow, Blackhorse Road and Higham Hill areas in LB Waltham Forest, and we have allowed for an element of this to continue in the event that a district centre comes forward at Tottenham Hale, given the expected continued representation of national multiple retailers in the centre.

4.23 Tables 11 and 12 show the turnover of the network of centres following trade diversion to THDC, at 2020 (Table 11) and 2025 (Table 12). Because we have modelled a reduction in turnover of the district centre relative to that currently achieved by THRP, the turnover of the existing network of centres will actually increase, as there will be less trade diversion in monetary terms than is currently taking place. A summary of the turnover of the centres pre-and post-Tottenham Hale redevelopment is shown in **Table 4.2.**

Table 4.2: Comparison goods turnover of LBH key centres at 2020 (no development and THDC scenarios)

	Comparison goods turnover (THRP scenario) 2020 (£m)	Comparison goods turnover (THDC scenario) 2020 (£m)
Tottenham AAP centres		
Bruce Grove / Tottenham High Road	26.5	28.1
West Green Road / Seven Sisters	8.2	8.4
Other centres		
Wood Green / Green Lanes	258.1	271.3
Muswell Hill / Crouch End	151.6	152.1

Source: Table 6/Table 11, Appendix VII

4.24 Our impact assessment model is based on a 'like for like' assumption, i.e. the district centre will compete for spending with other locations with a comparable retail offer, such as Wood Green, and to a lesser extent Enfield, central London and Edmonton Green – all of which the HRTCS survey data confirms are destinations to which residents in the TAAP area are currently undertaking their comparison goods shopping. However, it would not be expected that the development of 'high street'-format units at THDC would alter patterns of shopping to the extent that residents would no longer travel to these destinations (as it would be unrealistic to expect THDC to compete with higher order centres, e.g Wood Green is a Metropolitan centre on account of its extensive comparison goods offer).

4.25 The retail offer in Bruce Grove/Tottenham High Road and particularly West Green Road/Seven Sisters is different from that which is expected to come forward at the proposed district centre, as our health check assessments in Section 3 have identified. Whilst there are instances of retailers on Tottenham High Road which could potentially compete for expenditure (examples including Poundland, Superdrug etc) for the most part the comparison goods retail offer is orientated towards independent, specialist retailers who serve a largely localised catchment. Accordingly, the scope for these centres to be impacted by the proposals at THDC is expected to be limited.

Summary of impacts

4.26 Table 13a and 13b draw the findings of the previous tables together to show the impact in percentage terms on the comparison goods turnover of the existing network of centres within and surrounding the TAAP area at 2020 and 2025 respectively. The tables confirm that the impact on existing comparison goods floorspace will be positive, owing to the reduction in comparison goods floorspace and the resultant reduction in comparison goods turnover of THDC relative to that which is currently provided at THRP.

4.27 Table 13a shows that at 2020:

- a positive impact of +6.0% will arise on Bruce Grove / Tottenham High Road;
- a positive impact of +3.0% will arise on West Green Road / Seven Sisters; and
- a positive impact of +4.7% will arise on Wood Green.

4.28 These figures confirm that, if no other planning commitments come forward, a significant quantum of comparison goods floorspace could potentially be accommodated at THDC without a 'significant adverse' impact arising on the existing network of centres within or surrounding the TAAP area, and that the above-listed centres will see their turnover increase as a consequence of the retail floorspace at Tottenham Hale being reprofiled as a district centre.

4.29 Tables 13a and 13b also show the impact in percentage terms against the other centres to which the HRTCS identified that residents in the Tottenham area are currently undertaking their comparison goods shopping; however we have only modelled the turnover drawn to these centres from residents in the survey area – in reality the turnover of each of these centres will be significantly higher than identified in our impact assessment, once the comparison goods turnover of the remainder of each centre's respective catchment area is taken into account. Even taking this into account, the impacts against the surrounding network of centres and stores is shown to be positive against each centre, on account of the reduction in floorspace at Tottenham Hale.

Cumulative impacts with High Road West

4.30 At Table 14a and 14b of Appendix VII we factor in the potential development of comparison goods retail floorspace which is proposed as part of the High Road West (HRW) scheme (see paragraph 1.14), at 2020 and 2025 respectively. From reviewing the supporting material which has been submitted in support of the HRW planning application, which indicates that the comparison goods floorspace proposed at HRW will be split between 'specialist destination / sporting retailers' and 'typical high street retailers' (as part of a wider mixture of uses also including a small foodstore, cinema and/or bowling alley and restaurants/café space) we have assessed the likely patterns of trade diversion to the proposed floorspace and the extent to which it would compete with the existing network of centres in the TAAP area. Our assessment has been informed by the patterns of trade diversion used in the retail impact assessment submitted by GL Hearn in support of the HRW application, although direct interpolation of the GL Hearn data has not been possible due to differences in methodological approaches.

4.31 In their impact assessment, GL Hearn have assumed that the proposed comparison goods floorspace at HRW will draw trade from a wider catchment area than that which we have assumed for THDC. 62% of the turnover of the proposed comparison goods floorspace at HRW is forecast to originate from outside the survey area (which is the same survey area as used for this assessment and for the HRTCS), with 38% of the turnover coming from centres in LB Haringey. GL Hearn have assumed that the proposed comparison goods floorspace will draw just 1% of its turnover from each of Bruce Grove/Tottenham High Road and West Green Road/Seven Sisters. Whilst it is not within the remit of this study to draw comment on the robustness of the GL Hearn impact assessment, this clearly represents a low amount of trade diversion given the proximity of the HRW site to these centres, and if the Council was to approve the HRW planning application, it is recommended that appropriate conditions were put in place to ensure the nature and format of retail which comes forward is in line with what has been tested by GL Hearn.

4.32 Accordingly, the proposed comparison goods floorspace at HRW has, based on the assumptions maded by GL Hearn, relatively little impact on the existing network of centres in the AAP area. In our cumulative impact assessment set out at Tables 14 and 14b of Appendix VII, we have made some adjustments to the patterns of trade diversion which GL Hearn have assumed, as their impact assessment was based on Tottenham Hale remaining as a retail park rather than a district centre. For the purposes of our impact assessment we have assumed that the retail floorspace at HRW will draw 7% of its turnover from THDC, as we expect there to inevitably be a degree of overlap – albeit limited, if correctly controlled through planning conditions – between the two retail locations. We have also assumed that 25% of the turnover of the comparison goods floorspace at HRW will be diverted from Wood Green (which is comparable to the proportion of trade diversion modelled by GL Hearn). GL Hearn's impact assessment does not identify patterns of trade diversion to any centres outside of LB Haringey, and therefore for the purposes of our assessment we have assumed 25% of the comparison goods turnover at HRW will be diverted from Central London, with smaller levels of trade diversion from the other centres within and surrounding the TAAP area (e.g. Enfield and Edmonton Green).

4.33 Table 14a of Appendix VII shows that in the eventuality that the floorspace at HRW were to come forward as proposed, some centres will experience a negative comparison goods impact, and on other centres the impacts will remain positive. The highest impacts would fall on THDC (cumulative -7.1% impact at 2020), followed by West Green Road/Seven Sisters (cumulative -1.2% impact), and Muswell Hill / Crouch End (cumulative -1% impact). Based on the patterns of trade diversion tested by GL Hearn, the impact on Bruce Grove/Tottenham High Road will remain positive, but is reduced from +6.0% to +4.5% when considered cumulatively. The cumulative impacts against the existing network of centres are summarised in **Table 4.3.**

Table 4.3: Summary of cumulative comparison goods impact, THDC and High Road West

	Estimated comparison goods turnover pre-developments at THDC and HRW, 2020 (£m)	Estimated comparison goods turnover post-developments, 2020 (£m)	Cumulative trade diversion impact, 2020 (%)
Tottenham AAP centres			
Bruce Grove / Tottenham High Road	30.8	34.3	+4.5%
West Green Road / Seven Sisters	9.6	9.5	-1.2%
Tottenham Hale District Centre	61.7	57.3	-7.1%
Other centres (LB Haringey only)			
Wood Green / Green Lanes	358.7	359.8	+0.3%
Muswell Hill / Crouch End	177.4	175.7	-1.0%

Source: Table 14a, Appendix VIII

Scenario test with LB Haringey population forecasts

4.34 Tables B1 to B14 in Appendix VII re-run the comparison goods impact assessment (as described above) but adjust the levels of population growth in zones 7 and 8 of the survey account to take into account the planned housing growth expected to come forward in the TAAP area. Our population forecasts under this revised scenario (set out in Table B1) are derived from housing growth trajectories provided by the Council. The difference in population relative to the 'baseline' scenario described above is summarised in **Table 4.4**, which shows that applying the higher population growth rates generates additional population growth of 9,027 persons in the survey area at 2020, and 16,869 persons at 2025.

Table 4.4: Difference in population growth, Experian and LBH population forecasts

	Population of survey area, 2015	Population of survey area, 2020	Population of survey area, 2025
Baseline scenario	483,192	515,762	543,793
LB Haringey scenario	483,192	524,789	560,662
Difference to baseline scenario	-	+9,027	+16,869

Source: Table 1/Table B1, Appendix VII

4.35 The structure of the remainder of Tables B1 to B14 is unchanged from the approach set out above – the per capita spending on comparison goods, discounts for special forms of trading, patterns of trade diversion and other key inputs into the impact assessment are all unaltered. We draw attention to the following key findings:

- The comparison goods turnover of the existing network of centres will increase, on account of there being an increase in local population which will support these facilities. The comparison goods turnover of centres in the TAAP area will increase from £121.3m at 2020 under the Experian scenario to £125.2m under the LBH scenario, and as part of this the turnover of Bruce Grove / Tottenham High Road will increase from £29.5m at 2020 (Experian scenario) to £30.6m. In other words, if the levels of household / population growth forecast by LBH come forward as planned, there will be an additional £3.9m spent at comparison goods shopping facilities in the TAAP area, prior to any trade diversion to THRP / HRW.
- Tables 13a and 13b of Appendix VII identified, as discussed above, that positive impacts would arise on the existing network of centres on account of the reduction in floorspace and turnover of THDC relative to that which is currently provided at THRP. It therefore follows that the positive impacts will be further amplified by a larger population base. Accordingly, Table B13a shows that at 2020:
  - a positive impact of +6.2% will arise on Bruce Grove / Tottenham High Road;
  - a positive impact of +3.1% will arise on West Green Road / Seven Sisters; and
  - a positive impact of +4.9% will arise on Wood Green.
- These centres will therefore continue to see their turnover increase as a consequence of the retail floorspace at Tottenham Hale being reprofiled as a district centre.
- When considering the cumulative impacts alongside the proposed comparison goods floorspace at HRW, Table B14a shows that if the floorspace at HRW comes forward as proposed, the cumulative impact on THDC remains -7.1%, and West Green Road / Seven Sisters experience a cumulative negative impact of -1.0%, and Muswell Hill / Crouch End experience a cumulative negative impact of -1.0%. Other centres will continue to experience a positive cumulative experience, with Bruce Grove / Tottenham High Road experiencing a positive impact of +4.7%, and Wood Green a positive impact of +0.6%.

4.36 We would not consider these levels of impact to be 'significant' when assessed against paragraph 26 of the NPPF. However, the overlapping nature of the type of comparison goods floorspace which would be expected to come forward at both HRW and THDC might have a additional consequence of diluting operator demand, although this would be highly dependent on the size of units and type of retailers which ultimately come forward at both schemes.

Summary of potential comparison goods impact

- **In summary, based on the two population growth scenarios tested, we expect the following impacts to arise on existing comparison goods floorspace in the surrounding network of centres, when having regard to the proposals for THDC and HRW:**
  - **a positive impact of between +4.5% and +4.7% on Bruce Grove / Tottenham High Road;**
  - **a positive impact of between +0.3% and +0.6% on Wood Green / Green Lanes**
  - **a negative impact of between -1.0% and -1.2% on West Green Road / Seven Sisters;**
  - **a negative impact of -1.0% on Muswell Hill / Crouch End; and**
  - **a negative impact of -7.1% on the new district centre at Tottenham Hale (impact of HRW scheme only);**
  - **The impact on other centres in the surrounding area, such as Walthamstow, Stratford, Enfield and Chingford, would be expected to be negligible.**
- **At face value, we therefore would not consider the above cumulative comparison goods impacts to present significant cause for concern. However, the overlapping nature of the type of comparison goods floorspace which would be expected to come forward at both HRW and THDC might have a additional consequence of diluting operator demand, although this would be highly dependent on the size of units and type of retailers which ultimately come forward at both schemes.**

5 CONVENIENCE GOODS IMPACT ASSESSMENT

5.1 In this section we undertake an impact assessment of an increased quantum of convenience (food) goods floorspace at THDC. Currently, convenience goods floorspace at THRP is principally restricted to a small Lidl foodstore; in order to create a more balanced retail mix in the centre and meet the needs of existing and new residential communities, a greater variety of convenience goods floorspace will need to be developed. In common with the previous section, we assess impact based on Experian and LBH-derived population projections, and also a 'cumulative' impact assessment which assesses impact arising cumulatively alongside element of convenience goods provision at HRW, as well as other 'commitments' for new convenience goods floorspace in the TAAP which have been built out subsequent to completion of the HRTCS.

Approach to impact assessment

5.2 For the purposes of our convenience goods impact assessment, we have assumed that convenience goods provision at THDC will be uplifted relative to the current position, and we have allowed for 20% of the total proposed floorspace (3,979 sq.m gross / 3,184 sq.m net) at THDC to be used for the sale of convenience goods (see **Table 4.1**). Current provision at THRP is limited to a small-format Lidl store (net convenience sales 697 sq.m5), plus a Tesco Express store at nearby Hale Village. It is considered that this would be insufficient provision to cater for the needs of the new residential community at Tottenham Hale, and therefore we have tested the impacts of the development of a 'mainline' supermarket which would be operated by a non-discount retailer (e.g. Asda, Co-Operative, Morrisons, M&S Food, Sainsbury's, Tesco, or Waitrose). A summary of the convenience goods floorspace we have tested is shown at **Table 5.1**. For the purposes of our impact assessment we have assumed that the existing Lidl foodstore would also retain a trading presence as part of the new district centre.

Table 5.1: Summary of convenience goods floorspace, THDC

	Net sales area (sq.m)	Net convenience goods sales area (70% of total) (sq.m)	Sales per sq.m (£)	Turnover, 2020 (£m)
New foodstore	2,134	1,493	10,000	14.9

Source: Table 9b, Appendix VIII

5.3 Table 5.1 shows that the quantum of convenience goods floorspace we have tested will achieve (based on appropriate 'benchmark' sales densities), a turnover of £14.9m in 2020 (increasing to £15.2m in 2025).

[5] Source: HRTCS, Appendix 2

Assessment of impact

5.4 Our assessment of convenience goods impact is set out at Tables 1 to 13 of Appendix VIII. Reflecting the approach of the comparison goods impact assessment, Tables 1, 2 and 3 show the 'baseline' population and expenditure growth which is expected to come forward in the survey area, derived from Experian forecasts. Table 4 shows existing 'market shares' attracted to foodstores within and surrounding the survey area (the survey area is unchanged from the comparison goods impact assessment set out in the previous section); these market shares are 'composite' market shares, again derived from the household survey data underpinning the HRTCS. Market shares for 'main' food shopping are given a weighting of 70%, and market shares for 'top-up' shopping are given a weighting of 30%. Again, the list of centres and stores replicates that set out in the HRTCS.

5.5 Tables 5, 6 and 7 convert the convenience goods market shares in Table 4 to spending patterns at the 2015 base year, and the impact assessment years of 2020 and 2025. Table 5 shows that based on the results of the HRTCS household survey, the most popular convenience goods shopping locations in the TAAP area are:

- Sainsbury's, 867 High Road[6] (turnover from survey area at 2015 £22.7m);
- Sainsbury's Local, West Green Road (turnover £14.5m);
- Asda, High Road (turnover £11.4m);
- Tesco Express, High Road (turnover £10.9m);
- Tesco, High Road (turnover £10.2m);
- Iceland, High Road (turnover £9.7m); and
- Sainsbury's Local, High Road (turnover £8.3m)

5.6 It is possible that some respondents to the household survey have confused the stores they use most frequently for convenience goods shopping. For example, we consider it unlikely that the small Tesco Express store at 89 High Road would have a greater convenience goods turnover than the much larger nearby Tesco store at Seven Sisters, as suggested by the HRTCS household survey results. Our conclusions in respect of the potential impacts of the convenience goods floorspace at THDC should be considered with these potential anomalies in mind.

5.7 The Sainsbury's store at 867 High Road has, subsequent to the household survey, ceased trading and been replaced by a new, larger Sainsbury's store at Northumberland Park. For the purposes of our assessment, we have assumed that all of the turnover of the Sainsbury's High Road store has transferred to the new store at Northumberland Park, and we have also assessed the impact of the additional convenience goods floorspace in the new, larger store as part of a cumulative convenience goods impact assessment (discussed further below).

[6] Subsequent to completion of the HRTCS household survey, this store has ceased trading and been replaced by the new Sainsbury's store at Northumberland Park. The store now trades as B&M Bargains (a discount comparison goods retailer)

5.8 Tables 5, 6 and 7 of Appendix VIII also list the destinations outside the TAAP area which are used for convenience goods shopping. Reviewing the spending patterns in this table shows that some residents in the Tottenham area (zones 7 and 8 of the survey area) are travelling to foodstores further afield, including Tesco Extra in Upper Edmonton, Tesco Metro in Edmonton Green[7], Sainsbury's at Winchmore Hill, Tesco Extra at North Finchley, and Morrisons and Sainsbury's stores in Wood Green. Residents in zone 7 also visit branches of Morrisons, Sainsbury's and Asda in Stamford Hill, and Sainsbury's in Harringay. There is therefore a wide network of foodstores across the survey area, and further afield, to which residents in the Tottenham area are undertaking their convenience goods shopping, possibly suggesting a lack of large-format foodstores in the Tottenham area — although the subsequent opening of the Sainsbury's at Northumberland Park will have gone some way to addressing this.

5.9 Table 8a shows the floorspace assumptions for the proposed THDC we have used as the basis of our comparison goods impact assessment (as summarised at Table 5.1 above), and Table 8b shows how this floorspace will differ from the current composition of floorspace at THRP. Table 9a shows the turnover of existing convenience floorspace at THRP under a 'no development' scenario, and Table 9b shows the turnover of the convenience goods floorspace at THDC based on the parameters set out above, split between a replacement discount foodstore and the provision of a new 'mainline' supermarket.

Patterns of convenience goods trade diversion

5.10 Tables 10a and 10b of Appendix VIII show how much convenience goods trade diversion is expected to be captured from each of the zones in the survey area, at 2020 (Table 10a) and 2025 (Table 10b). Convenience goods shopping is generally considered a more localised shopping activity, and other parts of the survey area are well-provided for in terms of foodstores. In addition, the scale of convenience goods floorspace against which we have assessed impact is not considered to be of a scale that would draw trade from a wide catchment area. We have therefore assumed that 90% of the turnover of the convenience goods floorspace will be drawn from the HRTCS survey area, including 35% from zone 7 and 30% from zone 8. A further 15% is modelled to be drawn from zone 6, with incremental amounts of trade diversion from the remaining survey zones.

5.11 Tables 11a and 11b of Appendix VIII then show the patterns of trade diversion from the existing network of foodstores to the convenience goods floorspace at THDC in monetary terms, at 2020 and 2025 respectively. We have assumed that trade to the convenience goods floorspace will principally be diverted from the locations shown in **Table 5.2.**

[7] Subsequent to completion of the NLP household survey, this store has also ceased trading

Table 5.2: Estimated convenience goods trade diversion to THDC

	Trade diversion, 2020 (£m)
Sainsbury's, Northumberland Park	1.4
Sainsbury's, Harringay	1.4
Morrisons, Wood Green	1.1
Sainsbury's, Winchmore Hill	0.8
Morrisons, Stamford Hill	0.7
Tesco, Seven Sisters	0.6
Tesco Extra, North Finchley	0.7
Asda, Tottenham	0.5

Source: Table 9a/Table 9b, Appendix VI

5.12 As with the proposed comparison goods floorspace, we have assumed that much of the net additional convenience goods turnover at THDC will be 'clawback' from existing 'mainline' supermarkets beyond the TAAP area to which expenditure is currently being lost, including Sainsbury's stores in Harringay and Winchmore Hill, and Morrisons stores at Wood Green and Stamford Hill. We have also assumed that £1.4m will be diverted from the new Sainsbury's at Northumberland Park, with smaller amounts of trade diversion from Tesco at Seven Sisters and Asda at Tottenham, reflecting the fact these stores can be expected to serve more localised shopping catchments.

Summary of impacts

5.13 The trade impacts of the uplift in convenience goods floorspace at THDC are summarised in Tables 12a and 12b of Appendix VIII, for 2020 and 2025 respectively. The tables show that the solus impacts of an increased quantum of convenience goods floorspace are acceptable, and no individual store within or surrounding the TAAP area will experience an impact in excess of 5%. We would not expect these levels of impacts to threaten the trading viability of any of the existing network of foodstores.

5.14 It is important to note, however, that the network of foodstores listed in the impact assessment does not reflect the 'on the ground' position in terms of the current convenience goods retail provision in the TAAP area. The date of the HRTCS survey data means that it does not take into account two important convenience shopping developments which have taken place within the TAAP area subsequent to completion of the household survey, namely:

- The closure of the Sainsbury's store at High Road, Tottenham, and the opening of a larger, replacement Sainsbury's foodstore at Northumberland Park; and
- The re-opening of the Aldi store at High Road, Tottenham, which was closed at the time of the HRTCS household telephone survey on account of damage received during the London riots in August 2011. The store has subsequently been rebuilt and has recommenced trading.

5.15 In order to account for these developments we have treated them as 'commitments' for new retail floorspace and included them in a cumulative convenience goods impact assessment, which is shown at Table 13a (for 2020) and Table 13b (for 2025) of Appendix VII. The cumulative impact assessment also has regard to the fact that the proposals for new retail development at HRW also incorporate an element of convenience goods floorspace. The close proximity of each of these developments means that, invariably, each of the existing and proposed developments will draw trade from one another.

- For Sainsbury's at Northumberland Park, we have only tested the impact of the net additional floorspace over and above that which was previously operational at the company's former store on Tottenham High Road: as this store was still trading at the time of the household telephone survey, the turnover of existing retail floorspace is already accounted for. The new Sainsbury's store at Northumberland Park has a net convenience goods sales area of 3,600 sq.m; based on applying a sales density (turnover per sq.m) of £12,000 per sq.m, this store can be expected to achieve a turnover per annum of £43.2m. The company's former store achieved a convenience goods turnover of £24.7m; therefore the net additional convenience goods turnover we have modelled is £18.5m.
- The Aldi store at Tottenham High Road has a net convenience goods sales area of 594 sq.m. By applying a sales density of £8,000 per sq.m, this store can be expected to achieve a turnover of £4.8m per annum. No turnover is attributed to the Aldi store in the household survey results, therefore we test the impact of the total convenience goods turnover of the store.
- The proposed foodstore at HRW (we are not aware of an operator for this store) has a net convenience goods sales area of 442 sq.m and GL Hearn anticipate this store will achieve a turnover of £4.7m in 2020 and £4.9m in 2025.

5.16 We have modelled patterns of trade diversion to each of these 'commitments' based on our professional view on where these 'commitments' would be expected to draw their trade from. In the case of Sainsbury's at Northumberland Park, we have assumed that this store will compete with other large-format supermarkets to a greater extent than other supermarket facilities in the study area, for example Tesco Extra at Edmonton, Morrisons at Wood Green, and Sainsbury's at Harringay, reflecting the approach identified as best practice in the PPG. The existing Aldi and proposed HRW foodstores are smaller in scale, and therefore can be expected to compete with other local convenience shopping facilities to a greater extent, including existing and planned provision at THDC. In **Table 5.3** we summarise the impacts which we expect to arise as a result of the 'commitments' listed above, as well as allowance for additional convenience goods provision at THDC.

Table 5.3: Summary of cumulative convenience goods impact, THDC, High Road West & commitments

	Estimated turnover pre-development and commitments, 2020 (£m)	Estimated turnover post-development and commitments, 2020 (£m)	Trade diversion impact, 2020 (%)
Bruce Grove & Tottenham High Road			
Sainsbury's, Northumberland Park	43.2	36.7	-15%
Asda, High Road	12.6	10.7	-15%
Iceland, High Road	10.2	8.6	-16%
TFC, High Road	1.7	1.5	-12%
Sainsbury's Local, High Road	8.8	7.8	-11%
Aldi, High Road	4.8	2.7	-43%
Other/local stores	18.2	16.6	-9%
West Green Road & Seven Sisters			
Tesco, 230 High Road	11.9	10.1	-15%
Tesco Express, 89 High Road	11.5	11.1	-3%
Sainsbury's Local, West Green Road	15.3	14.9	-3%
Other stores, West Green Road & Seven Sisters	4.9	4.6	-8%
Tottenham Hale			
Lidl, Tottenham Hale Retail Park	4.1	2.3	-43%
Tesco Express, Hale Village	2.8	2.4	-16%

Source: Table 11a, Appendix VI

5.17 Table 5.3 shows that, when considered cumulatively, a number of substantial impacts arise (in percentage terms) against the existing network of foodstores. This is a consequence of the fact that, with the exception of the new Sainsbury's at Northumberland Park, the existing foodstores in the TAAP area are generally small and medium-format stores, and therefore derive lower turnovers from the survey area than larger stores. Consequently, any impacts against these stores are proportionately higher in percentage terms. The greatest impacts fall against the two discount foodstores – Aldi at Tottenham High Road and Lidl at Tottenham Hale (we have assumed the turnover of Lidl will be 'transferred' to a replacement store at THDC). Most of the other foodstores in the two district centres would experience impacts in the region of -10% to -16%, which could in some cases potentially compromise the long-term trading performance of the stores.

5.18 Whilst impact against individual stores is not directly a planning matter, it can become a concern where trade diversion from these stores could have a 'significant adverse' impact on the wider vitality and viability of the centre in question. Our health check assessments have confirmed that both Bruce Grove/Tottenham High Road and West Green Road/Seven Sisters have important convenience goods shopping functions, with representation of convenience goods retailers above UK average levels in both centres (and noticeably so in the case of West Green Road). However, much of this convenience goods retail offer is accounted for by small, independent specialist convenience retailers: our cumulative impact assessment has shown these will experience a combined impact of -9% in the case of Bruce Grove/Tottenham High Road and -8% in the case of West Green Road/Seven Sisters. Because these impacts will be distributed across a wide number of retailers, we consider these levels of impact are likely to be acceptable.

5.19 We have highlighted above that, in percentage terms, a number of high impacts arise against existing larger supermarkets. To better quantify the implications of the forecast levels of trade diversion, in **Table 5.4** we assess the turnover of these stores (before and after the cumulative trade diversion) against their 'benchmark' levels, i.e. the turnover they would be expected to achieve if trading at company average levels. Because they were not trading at the time of the household survey, it is not possible to undertake this exercise for the Sainsbury's store at Northumberland Park, or the Aldi store on Tottenham High Road.

Table 5.4: Existing and future trading performance of foodstores in TAAP area

	Estimated turnover pre-development and commitments, 2020 (£m)	Benchmark turnover, 2020 (£m)	Difference to benchmark, pre-development and commitments, 2020 (£m)	Estimated turnover post-development and commitments, 2020 (£m)	Different to benchmark, post-development and commitments, 2020 (£m)
Bruce Grove & Tottenham High Road					
Asda, High Road	12.6	6.6	+6.0	10.7	+4.1
Iceland, High Road	10.2	3.3	+7.0	8.6	+5.4
TFC, High Road	1.7	2.3	-0.6	1.5	-0.8
Sainsbury's Local, High Road	8.8	2.8	+6.0	7.8	+5.0
Other/local stores	18.2	10.5	+7.7	16.6	+6.1
Total	**51.5**	**25.5**	**+25.5**	**45.2**	**+19.7**
West Green Road & Seven Sisters					
Tesco, High Road	11.9	21.6	-9.6	10.1	-11.4
Tesco Express, High Road	11.5	3.0	+8.5	11.1	+8.1
Sainsbury's Local, West Green Road	15.3	3.1	+12.2	14.9	+11.8
Other/local stores	4.9	10.0	-5.0	4.6	-5.4
Total	**43.7**	**37.6**	**6.1**	**40.7**	**+3.1**

Source: Table 11a, Appendix VI

5.20 Table 5.4 shows that existing foodstores and local convenience retailers in Bruce Grove/Tottenham High Road district centre are trading well, and as an aggregate convenience stores in the district centre are trading at approximately +£25.5m above company average levels under a 'no development' scenario. Once allowance is made for the opening of the new Sainsbury's and Aldi stores, and the proposals for new convenience goods floorspace at THDC and HRW are included, we expect that the majority of stores in the district centre will continue to trade above company average levels, with an aggregate position of over-trading of approximately +£19.7m.

5.21 The trading performance of existing convenience goods retailers in West Green Road/Seven Sisters district centre is less clear cut. The results of the household survey show that the Tesco store at 230 High Road (which can be considered the 'anchor' store to the district centre) is underperforming, with a turnover approximately £10m below company average levels, which will increase to £11m below company average levels following trade diversion to the commitments and proposals. However, the household survey results also suggest that the nearby Tesco Express store at 89 High Road is performing well in excess of what we would expect a typical small-format convenience store to achieve – it is plausible therefore that respondents to the HRTCS household survey have confused the two stores, and each store will have a turnover which is closer to benchmark levels. The HRTCS household survey results do however also identify that local retailers in the centre are trading at below average levels. The impacts of new convenience goods floorspace at THDC, are, when considered along the proposals for HRW and existing commitments, therefore more marginal in terms of acceptability against this district centre.

Scenario test with LB Haringey population forecasts

5.22 Tables B1 to B14 in Appendix VIII re-run the above convenience goods impact assessment, but adjust the levels of population growth in zones 7 and 8 of the survey account to take into account the planned housing growth expected to come forward in the TAAP area, as summarised in the previous section. Table B14 shows that the implications of the additional housing growth on the trading performance of the existing network of foodstores is relatively limited: for example, when taken alongside the HRW commitment:

- the cumulative impact on the Sainsbury's store at Northumberland Park is unchanged at -15%;
- the cumulative impact on the Asda store on Tottenham High Road reduces from -15% to -14%;
- the cumulative impact on the Tesco store at Seven Sisters reduces from -15% to -14%;
- the cumulative impact on local shops in Bruce Grove/Tottenham High Rd reduces from -9% to -8%; and
- the cumulative impact on local shops in West Green Road / Seven Sisters reduces from -8% to -7%

5.23 On this basis, we consider that the conclusions set out above in respect of the cumulative impacts on the existing network of foodstores to remain applicable in the event that higher levels of population growth comes forward, i.e. so whilst the levels of impact arising solely from new convenience floorspace at THDC are acceptable, when considered cumulatively alongside new foodstore developments which have commenced trading subsequent to the HRTCS and proposed convenience goods floorspace at HRW, they present a greater cause for concern, particularly in respect of potential impacts against existing convenience goods floorspace in West Green Road / Seven Sisters district centre, which makes an important contribution to the wider vitality and viability of the district centre.

6 CONCLUSIONS & RECOMMENDATIONS

6.1 Bilfinger GVA have been instructed by the London Borough of Haringey to undertake a retail impact assessment of the development of a new district centre at Tottenham Hale. The impetus for the transformation of the existing Tottenham Hale Retail Park to a district centre is firmly established in the Council's adopted and emerging policy framework; however in order to ensure that the aspirations of the Council can be fully supported in policy, it is necessary for the Council to have a robust evidence base which demonstrates the aspirations can be supported without impacting on the vitality and viability of the existing network of centres in the nearby area (both within and surrounding LB Haringey).

6.2 This report responds to this need, by setting out the potential impacts which could arise on the Council's existing network of centres following the development of the proposed district centre at Tottenham Hale. We have also tested the cumulative impacts which we expect to arise as a consequence of the development of Tottenham Hale District Centre (THDC) alongside the emerging proposals for new retail floorspace at High Road West, Tottenham (HRW). Both THDC and HRW fall within the boundary of the Council's emerging Tottenham Area Action Plan (TAAP), as discussed in Section 2, along with existing district centres at Bruce Grove/Tottenham High Road and West Green Road/Seven Sisters.

6.3 Our assessment has been informed by the Council's existing retail evidence base, chiefly the Haringey Retail and Town Centres Study (HRTCS) 2013, prepared by Nathaniel Lichfield & Partners (NLP) on behalf of LB Haringey. In particular, we have adopted the same household survey data and floorspace assumptions (e.g. amount of floorspace in centres, size of foodstores, and so on) in order to be as consistent with the Council's existing evidence base as possible.

6.4 There is an existing network of centres which has potential to be impacted by the proposals. As well as the two district centres within the TAAP area mentioned above, there are surrounding centres including Wood Green, Enfield and Edmonton Green which the Council's evidence base has shown are all recipients of expenditure from residents in the Tottenham area, both for comparison (non-food) and convenience (food) goods. Other centres further afield attract comparison goods spend, in particular central London and Brent Cross. Foodstores in locations such as Harringay Green Lanes, Stamford Hill and Upper Edmonton also exert influence over the shopping patterns of residents.

6.5 We have undertaken updated health check assessments of the centres within the TAAP area which has confirmed that both Bruce Grove/Tottenham High Road and West Green Road/Seven Sisters have generally positive levels of vitality and viability. Both centres rely on the presence of medium-sized foodstores and a wide range of retail services to underpin their successful functioning, and both centres have a limited comparison goods offer. The opening of the new Sainsbury's at Northumberland Park represents a positive investment in the area (although the store is not within the defined centre), and further improvements are expected to come forward allied to the redevelopment of White Hart Lane. The centre is fully 'open for business' following damage in the London riots, and can overall be considered to be in a strong position moving forward. West Green Road/Seven Sisters also appears to be trading well, and its lack of comparison goods multiple retailer representation means that we consider it has limited scope to be substantially impacted by the proposals at Tottenham Hale and HRW.

6.6 The aspiration of the Council is for a new district centre at Tottenham Hale to include a more balanced mix of 'town centre' uses, refocusing the offer of the centre away from the 'bulky goods' comparison goods-led development which currently trades as Tottenham Hale Retail Park, The amount of comparison goods floorspace, and thus turnover, of the proposed district centre, will be lower than that which is currently achieved by Tottenham Hale Retail Park, and on this basis the comparison goods turnover of the existing network of district centres would, in fact, be expected to increase. In other words, we expect the comparison goods impact (in quantitative terms) on the existing network of centres within and surrounding the TAAP area to be positive.

6.7 Wood Green is the centre which many residents in Tottenham look towards for their comparison goods shopping and this centre is evidently performing solidly. The centre has an above-average number of comparison goods operators and scores highly in terms of representation from national multiple retailers, particularly in the lower-to-middle ranking operators. There is therefore more scope for Wood Green to be impacted that the centres in the Tottenham AAP area; however, reflecting the point above, the net impact against the turnover of the Wood Green will in fact be positive. The same approach can be applied to the other higher-order centres such as Brent Cross, Enfield and Edmonton Green to which residents in the TAAP area are currently travelling.

6.8 Our 'cumulative' comparison goods impact assessment has shown that the development of 'high street' format comparison goods floorspace at Tottenham Hale, is, when considered alongside the proposals for HRW, likely to be acceptable. However, this is based on the patterns of trade draw to HRW being as tested by the applicants for this scheme, which suggests HRW will be a retail 'destination' and therefore less likely to compete with the local network of centres to any significant extent. It is recommended that the quantum and type of comparison goods floorspace at HRW is controlled by appropriate planning conditions to ensure that the type of retail which comes forward does not compete with the existing (and proposed) network of district centres to a greater extent than has been tested by the applicants.

6.9 We have also tested the impact of additional convenience goods floorspace at THDC, in addition to proposals for comparison goods provision as part of the HRW scheme and factoring in developments which were not trading at the time of the HRTCS study household survey, most significantly the new Sainsbury's at Northumberland Park. There is no doubt that there is now a substantial number of foodstores in the Tottenham AAP area and many of these play important roles as 'anchor' stores to district centres. The impacts associated with the proposed convenience goods floorspace, are, on balance, considered to be more marginal, and some stores could experience levels of trade diversion which could potentially compromise their long-term trading performance.

6.10 Overall, convenience goods retailing in Bruce Grove/Tottenham High Road would continue to trade at above 'benchmark' levels following trade diversion to THDC and HRW and therefore the convenience goods impacts against this centre are likely to be acceptable. For West Green Road/Seven Sisters, this situation is less clear cut, and an uplift in the amount of convenience goods floorspace at THDC could potentially lead to high levels of impact. The impacts on existing foodstores would be marginally reduced if no foodstore provision was to come forward at HRW, although this would not result in our conclusions above altering.

6.11 The NPPF requires impact to be assessed against the vitality and viability of centres as a whole (rather than against specific functions), and on this basis we consider that, having regard to the findings of our updated 'health check' assessments, based on the parameters tested in our impact assessment (in terms of levels of population and expenditure growth, patterns of trade diversion, and HRW proposals coming forward as tested), we would not expect any existing centre within or surrounding the TAAP area to experience a 'significant adverse' impact were a district centre to come forward at Tottenham Hale. On this basis, we consider there to be a robust policy basis for the reconfiguring of Tottenham Hale Retail Park to form a new district centre.