

Wilmer Place (2012/2228)

Consultation

- The current application comes after two brief consultation event with the general public and further meetings with special interest groups.
- Neither Sainsbury's nor the developer were willing to engage in direct contact with the local community in the form of a public meeting. They were not interested in discovering what the community wanted to happen on the site
- There is near-universal opposition amongst the local community.
- Sainsbury's and the developer didn't understand the local sensitivities of the site, either it's built context or it's commercial appeal.
- The supermarket's requirements have lead the development's design progression and the awkward compromise we have in this proposal is no doubt a result of that.
- The changes in the design made between the first and second consultations are largely viewed as improvements over the first design, the current application still has massive shortcomings.
- The revised proposals were the subject of a single seven-hour exhibition, on a weekday afternoon/evening that was poorly advertised and not at all visible from any of the public highways.
- The awareness of the second consultation exhibition was very low amongst residents of Stoke Newington
- Although the organizers did write to those who had registered comments at the consultation on the previous scheme, many engaged at that point did not leave names and addresses.
- The poor turnout at the second exhibition is, no doubt, a result of this and demonstrably does not reflect the strength of feeling and desire to be involved from the local community.
- The second consultation included no models, only a single elevation and no CGI views. This made assessment of the visual impact all but impossible.
- Regrettably, and no doubt as the sensitivities surrounding a large retail unit were poorly understood from the outset, the reactive consultation garnered almost entirely negative feedback locally.
- Stoke Newington has a highly creative and professional element amongst its population and it is clear from campaign meetings that an earlier, more proactive opportunity to express ideas on how the site might be developed would have been embraced. It may well have led to a viable, creative, and socially desirable development.
- In rejecting this application, we hope the reasons are complete and reflect the community view. The community might then re-engage with the developer with an open mind and arrive at a more acceptable application next time round.

Affordable Housing

- The proposed mix of the 68 residential units is outlined in the *Planning Statement* section 1.3.
- With a target (Core Strategy Policy 20) of 50% housing at below market rents (on major developments) the offering of 28% of units (18% units / 22% bedrooms affordable rent; 10% units / 11% bedrooms intermediate shared ownership) is *significantly* short of the target.
- It is widely recognised that definition of 'affordable' in the context of Hackney is already a long way out of the reach of many Hackney residents.
- As Robbie de Santos, a Lower Clapton resident and Housing Policy professional observes, "Stoke Newington is one of the most expensive areas within the borough for housing and so the need for affordable homes is greater here. Major developments elsewhere in the borough will be contributing to a much greater extent to the 50% target, so without stronger intervention, Stoke Newington could see even fewer affordable homes as a proportion of

those in the borough. The 7 shared ownership units would benefit middle income households, but do very little to improve access to housing for people on lower incomes.”

- There should be little room for manoeuvre below the 50% target. The *Financial Viability Statement* is not a public document and the specialist consultants retained to examine that statement will need to look for a strong justification for such a massive discrepancy. If it is to be significantly missed, the proposal should seek to exceed the target below-market-rent tenure split of 60% social rent to 40% shared ownership. 30% of TOTAL housing (i.e. 60% of 50%) should be seen as the absolute minimum for a social rent target.

Access

- It is significant that pedestrian access to both the residential units (with a nominal 144 residents) and the retail unit is via a short segment of Stoke Newington High St. Consultations on earlier schemes have identified considerable transport difficulties for this site, positioned, as it is, at the end of a one-way system that is unlikely to change in the short or medium term. Indeed the presence of this development and its particular access configuration may constrain any future attempt to remove the Stoke Newington Gyratory.
- The developers have conceded that the development is not suitable for any form of car parking (apart from disabled resident's bays) by virtue of its location on the gyratory and the current use of the narrow footpath on Stoke Newington High Street.
- The majority of the stretch of the footpath between the junction with Stoke Newington Church Street and the end of the one way system at Northwold Road is reserved for bus stops for nine busy day services (with 78 vehicles per hour according to table 3.3 of the *Transport Assessment*) and 4 night services serving Stoke Newington. It already suffers from pedestrian congestion around the bus stops. The increase in pedestrian flow around that area needs to be carefully studied for its impact on the bus stops and congestion on the footpath in general. Any 'thinning' of the two bus stops to accommodate the increased flow of pedestrians, would be to the detriment of passengers who may have to stand between several stops.
- Paradoxically, a car-free development will cause vehicles to stop in front of both the residential and retail development, in the bus stops and bus lane for pick-ups and drop-offs of both residents, visitors, and shoppers. Additionally delivery drivers unfamiliar with the residential development, or those unwilling to make another circuit of the slow gyratory, will be inclined to park up to drop off to make drop offs to the residential development entrance. No amount of signage and traffic orders deeming these movements as illegal will prevent infringements occurring and when they do they have potential to seriously reduce the flow of the many buses through these stop and bus lane.
- Although some way from detailed development, the impact on the proposed CS1 cycle superhighway should be considered in this context.
- Primary access by cyclists to both the retail and residential development is via Stoke Newington High Street. Against the backdrop of 78 bus movements per hour this is a clear safety concern.
- The Transport Assessment (4.21) suggests the 22 cycle spaces for the retail development be provided on the public highway along Stoke Newington High Street. There is no demonstration of how 11 Sheffield stands or similar might be provided on this already narrow stretch of footpath that wouldn't impede the flow of pedestrians along the footpath or indeed to new or relocated bus stops.
- There will additionally be some enticement for cyclists coming from the north to make dangerous movements across the A10 and bus lanes to avoid the gyratory and head straight for the development entrances on Stoke Newington High Street.

Scale and massing

- There is apparently no model for the development, which would make assessment of the scale and massing somewhat easier.
- The particular design, although clearly subjective, does articulate a structure that rises to six stories relatively well in isolation. But in the context of this ecological- and heritage-sensitive site, the overall scale and mass are alien. Constrained on all sides by long established building and trees, the envelope of the this pocket of land is well established, and even the relatively well-articulated mass rises well above the familiar natural and built features in the vicinity and with it's prominence, detracts significantly from the setting of the surroundings.

Principle of development - Suitability of the Site

- The proposal identifies the *Hackney Retail and Leisure Study* (Roger Tym & Partners, for LBH, May 2005) as a justification for provision of a new retail development. Importantly that study, whilst informing future policy has not been adopted, wholesale, as policy.
- Section 4.11 of the Executive Summary of that report merely identifies Wilmer Place as a "development opportunity" and "suitable for retail or leisure uses". The report does not particularly seek to assess need, desirability or suitability of a specific retail proposition, save for a single suggestion that in the District Town Centre as a whole, "some 12% of respondents suggested the provision of a cinema or leisure facility" (s3.24).
- Section 5.9 refers to [the adopted, July 1999] "development brief [for Wilmer Place] which seeks to encourage a wide range of town centre commercial and community uses" and reiterates that "both retail *and leisure* uses are suitable, though development would be assisted if various owners (including the Council) cooperate in preparing a comprehensively designed scheme."
- As section 3.6 of the Planning Statement refers, on a wider scale, the report identifies the lack of comparative goods retail in Stoke Newington District Town Centre without identifying a particular need. Indeed it goes on to confirm that nearby Dalston "attracts shoppers from ... Stoke Newington without losing significant trips to [it]".
- Furthermore this proposal's particular large-scale retail offering - a supermarket - far from filling a gap in provision, seeks to replicate the convenience retail which already exists in the Stoke Newington District Town Centre and adjacent Church Street Local Shopping Centre.
- There are many smaller scale independent grocers two "Metro/Express" chain supermarkets and the long established Morrison's site just 330m away to the north, with over three times the retail floor space of the proposal.
- Section 3.3 of the application Planning Statement evidences the 2005 Study for "intensification" of the site to "underpin the vitality and viability of the area". The principle is, broadly, one the community supports, but doesn't believe "an **additional** convenience offer" does that. Indeed a single chain offering on this scale does much to damage and destroy the vitality and viability (see the Response to the Retail Statement below).
- The principle of providing a mixed use development with housing is not contested, provided the employment opportunities on the site are retained and there is no collateral loss of employment in the immediate District Town Centre and Local Shopping Centre.
- The Planning Statement goes on to claim (section 3.8) "the proposal will strengthen the retail offer of [the] District Centre, enhancing consumer choice and providing a more competitive retail offer." In reality the supermarket offers nothing not already in abundance in the District Centre, and campaign group Stokey Local's studies of pricing within the District and Shopping Centres show Sainsbury's to consistently be more expensive than the independent retailers and Morrisons convenience retailers in every category.

- The false perception that this large retailer with its low margins and buying power offers better pricing is a powerful one that will unquestionably drive shoppers to it on that bogus premise; and away from the other retailers, compromising their viability.
- As observed more fully in the Heritage considerations, in 2006, the Planning Inspector, in rejecting an appeal for a large unit on Newington Green, asserted “it is legitimate for the local planning authority to seek to protect and strengthen established shopping centres. ... The addition of another shop... is bound to impact on the viability and vitality of the existing shops selling similar lines of goods”.
- It further claims the proposal “will have direct and indirect benefits for other town centre businesses through increased footfall and ‘linked trips’. This is highly unlikely. So called “linked-trip” theory is highly theoretical and assumes some general characteristics of an area that simply aren’t present in the unique grain of Stoke Newington.
- A car-free development with more expensive convenience offering, will not attract the large number of families north of Cazenove Road who currently use the much larger Morrisons near by, and similar sized Sainsbury’s at Stamford Hill Broadway. There may be a small number of pedestrian customers in the immediate vicinity of Morrison’s who may, through brand perception, prefer the Sainsbury’s offering, but in reality, with an Sainsbury’s already at Stamford Hill Broadway, this has tiny potential and it is beyond unlikely that any of those would venture far into the other High Street stores in the vicinity.
- The store is most likely to pick up trade from commuters arriving at Stoke Newington Rail Station in the evening, continuing south, on foot. Or commuters travelling in all directions who arrive at the bus stops on the High Street. These commuters will already be passing through the area that the proposal claims could benefit.
- Unfortunately the one way system divides the retail offering in the area. The type of retail offerings in the immediate vicinity of the site, on the High Street between the Cemetery and the junction with Church Street reflect this. There is near 100% occupation in these units and the businesses are generally viable and long-established; they change far less frequently than Church Street or in the south of the High Street. These retailers are unlikely to benefit from the diversion of trade the proposed supermarket offers.
- In fact there simply is no evidence to suggest there will be any increase in footfall that could meaningfully benefit extant or future traders on the High Street.
- Inexplicably, section 3.9 claims the proposal “will ensure that locally generated expenditure is retained in Stoke Newington”. Without an agreed housing partner it is hard to make or verify such a claim as far as operation of the residential element is concerned. But we can say with some certainty that Sainsbury’s will not be retaining any meaningful amount of the store’s turnover in the local economy. Indeed as public limited company it has a duty to return profits to shareholders. In surveys we established a particularly strong link between the business to business trade of the patchwork of small trades currently operating on site and other local trades, professionals and retailers.

Character of Stoke Newington District Town Centre and Local Shopping Centre

- The *Hackney Retail and Leisure Study* of 2005 recommends “that policies be introduced to protect and enhance Stoke Newington’s character and function as a district centre.”
- The Planning Statement claims (section 3.9): “the proposal will improve the overall quality and attractiveness of the [Stoke Newington District Town] centre”. There is little evidence for this. Indeed apart from reinstating some of the architectural features higher up at 193-201 Stoke Newington High St, the rest of the development is either neutral (being largely concealed) or arguably destructive (the combined frontage disrupting the small-scale pattern of shopfronts).
- Stoke Newington District Town Centre and the Church Street Local Shopping Centre together form a particularly atypical centre, especially by London standards. Stoke Newington is not a village in the countryside, but a “village” in an urban metropolis

comprised of centres, many of which share common characteristics that are absent in Stoke Newington.

- The retail character of the centres forms a significant part of the heritage character enshrined in the Conservation Area. The small units, occupied almost exclusively by an eclectic variety of independent retailers. Amongst the handful of conventional convenience retail is a wealth of more specialist comparative goods retailers and a relatively high proportion of restaurants and cafes, which are, but for one, local, independent businesses. For right or wrong, this fine grain independent retail is what Stoke Newington is known for. Its reputation is hard won and stands out in a London that is increasingly repetitive in urban structure. For right or wrong the reputation drives the residential market and its visitors who come largely for food and the open spaces. Visitors do not, and are unlikely to ever come for the convenience retail offering.
- Claims of revitalising the area, increased footfall and linked trips do not stack up. This is not a novelty offering. Indeed section 3.55 of the Planning Statement concedes “the foodstore... serve[s] the localised residential catchment rather than seeking to draw trade from neighbouring centres.” That localised catchment is already familiar with the retail offering on the High Street and presented with another choice that is not novel, is unlikely to veer far off its familiar routes to explore new retail offers.
- The store itself is most certain to draw trade. There is undoubted convenience, particularly for those south of Cazenove Road, of a large store where multiple items can be bought, loyalty card points earned, and spent, and the marketing machinery that convinces us it's a value proposition (despite local evidence to the contrary). This will, without question, have a long term detrimental impact on the character of the Conservation Area and its independent small scale shops. Both the perceived threat and the slow draw of trade away from the other, dispersed convenience stores, will draw footfall away from other shops and drive people directly home. Demonstrating that people will use the store is not a demonstration that it is *needed nor desirable*. It is a demonstration only that it is perceived as more convenient than, say the larger superstore 300m to the north. In practice, local residents will favour the convenience but have no complaints over the nature of the current smaller, disparate offerings.

Employment

- The potential employment opportunities are of course welcome. Many of the construction jobs will, of course, apply to any type of development on this site of a similar scale and are, in any case, transient.
- There are a number of established jobs on the site at present spread across a number of small businesses all of which will either cease trading, or relocate. Relocation will incur significant expense for the business owners and it is by no means a certainty that any of those currently employed on site would be available to work in any relocated site.
- Indirectly the small businesses on site at present use other local trades and businesses to supply goods and services. A significant proportion of this local trade would disappear as these businesses relocate or wind up.
- The 80 full-time equivalent jobs in the large new retail store will not materialize until the development is complete and the tenant starts trading. Once trading begins, many of the senior jobs will be filled by experienced staff already in the operators employment, from other sites. The remaining job opportunities could be subject to a local labour agreement but it is unclear how such an agreement could work in practice, how enforceable it might be and how long it might last. What starts off as a largely locally sourced workforce could, over a relatively short period become diluted as staff move on to other jobs and replacements are recruited from further afield.
- Job losses associated with the large scale retail operation are difficult to quantify, but will be significant. They will most likely take a period of time to materialise as existing retailers in

the vicinity scale down or cease trading because of both the perceived threat and actual pressure on sales brought to bear by the low-margin, low-cost operation of the major retailer. There is no opportunity for a 'transfer' of jobs in the area. By and large, current businesses will instead shed their staff or scale down hours some time after the new large-scale retailer has employed its workforce. Even if the net employment in the area is broadly positive (and this is by no means a given), the new job for the unemployed worker comes as no solace for the established employee of a local business that scales-down, who is latterly left out of work.

- Section 3.1 of the Planning Statement notes that various policy "resists the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose." This is evidently not a site where that can be demonstrated even in its current form. If the argument is that this supports the net gain of employment on site under the proposed scheme, it fails to take into consideration the nature of that employment and the collateral losses within the District Town Centre, Local Shopping Centre and further afield.

Ecology and Biodiversity

- Section 1.1 of the *Planning Statement* claims "notable enhancements to the ecology and biodiversity of the site". It should be noted this claim is restricted to the development site, not to its immediate neighbours, the significant and important ecology of which is noted elsewhere and is under threat from this development.
- We leave the bulk of the expert analysis on the effects of the development on the ecology, and biodiversity of the Abney Park Cemetery to the Abney Park Trust and Russell Miller Arboriculture whose comments we support. These are summarised as follows:
 - The proposed development should be rejected on the following grounds:-
 - Failure to conduct an Environmental Impact Assessment or any proper investigation into the consequences of the development for Abney Park Cemetery Nature Reserve;
 - Failure to conduct adequate bat surveys. Bats are known to exist at Abney and the developer's ecological surveys reveal they may be present on the site itself. Despite recommendations to do so by their own ecologists the developers have failed to conduct a full nocturnal bat survey across all appropriate seasons;
 - Failure to design in the retention of Abney's valuable veteran trees. The developer's tree survey fails to recognise the importance and value of Abney veteran black poplars. The developer originally sought to fell 12 trees inside Abney (including 8 old black poplars). Whilst the developer appears to no longer require the trees to be felled they nevertheless intend to build right up to them and thereby condemn them by default in breach of industry best practise guidelines.
- In section 3.33 of the Planning Statement the overshadowing (summarised from the more detailed report) does affect the "Cemetery to the west of the site in the morning and to the northern entrance area later in the afternoon." Given the fragility and rich ecology of the site, dismissing this overshadowing as "negligible" is unconvincing.

Design

- Although somewhat subjective, the overall design quality is evidently high. The accommodation in particular offers a particularly good integration of outdoor space, communal space, daylight and living space. The proposed materials are of a high quality and the overall appearance and shape are architecturally interesting.

- However, it is wholly inappropriate for the unique sensitivities of this pocket of land and property.
- The ‘improvements’ to the terraces properties on the High Street are limited to detail above the ground floor. Insertion of an alien shopfront across 5 units in the terrace of townscape merit is to the detriment of the conservation area and the well established small-scale grain of the shop fronts in both the High Street and Church Street.
- Section 3.37 of the Planning Statement claims the foodstore entrance design will “add vitality and visibility to the High Street” but even if true only does so to the small north west segment of the street, substantially separated as it is, from the shops on the lower High Street and Church Street by the one way system and the bus stops. As has been discussed elsewhere, it is arguable that this small parade is in particular need of increased vitality even if it could demonstrated this proposal would add that.

Heritage

- The Heritage Statement lays out the policy position and assets clearly. However it fails to make a case as to *how* this proposal will positively contribute to the built heritage.
- Abney Park Cemetery is clearly a sensitive ecological and heritage asset. This proposals threatens to damage the Cemetery in three key ways: ecologically, aesthetically, though overlooking and economically.
- The main ecological arguments, as mentioned elsewhere are best left to Abney Park Trust, Russell Miller Arboriculture and the Garden History Society whose submissions we have seen and support.
- Aesthetically, it seems easy to argue that the current bland, low quality construction on the site harms the setting of the Cemetery, in particular the critical views from Cazenove Road (incorporating the Northwold & Cazenove Conservation Area) and Stamford Hill. In reality the damage is mitigated by the low height of the construction, its colour scheme, the lack of detail to the gable that faces the gates, and crucially, the massing, hard by the High Street terrace. Unquestionable the insertion is insensitive and it’s removal couldn’t fail to improve the setting.
- The scale and massing of the proposed development is too large and dominates the Cemetery and the entrance in particular. Although ‘pulled back’ from the border of the Cemetery since the original proposal, this application is still considerably closer than the extant building. It rises much higher and the articulation, whilst being aesthetically interesting in another context, actually serves to reinforce the sense of overshadowing and way in which the building dominates the view. Additionally the V shaped ‘slot’ that is created by the articulation, between the backs of the High Street terrace and the vertical extremity of the proposed residential block, creates a visual interruption that further draws attention away from the Egyptian gates, and flora of the Cemetery, which should always be the dominant feature in those critical views from Cazenove Road and Stamford Hill, both of which rise away from the site.
- The extreme massing at the border of the Cemetery is totally alien to the fine urban grain of the entire Conservation Area and it’s surrounding. It also destroys the relative seclusion of parts of the Cemetery. Accessible, open green spaces are critical socially, particularly in dense urban environments such as Hackney. The sense of relative seclusion that these spaces offer is vital to preserve. It can only be destroyed once. Views over the Cemetery, indeed any green space, are of course, highly desirable but must be resisted. Allowing developments that overlook, effectively sells off the views to a handful of people who can afford the premiums such residences attract, and destroys the seclusion, privacy and ‘escape’ of a vast expanse of space that could otherwise be enjoyed by anyone. High rise over open spaces is not to be resisted per se, but where development is so close as to overlook the space that it permanently destroys privacy and seclusion, it must be prevented.

- From the High Street, the aesthetic effect of the new shop-front spanning five units will be significant and alien to the Conservation Area which is largely characterised by single and some double units. Larger units exist in isolation along Church Street but are sensitively designed and the independent styling reinforce the character of the Conservation Area. There are highly-branded chains of a larger scale further south on the High Street but they exist in a wholly different context, dense with shop-fronts on both sides. At this point, north of Church Street, the rhythm of shop fronts, and in particular their interruptions is well defined, and of a small, low-key scale. Apart from the inappropriate scale of a vast glass five-unit shopfront, the particular tenant - Sainsbury's - will most likely demand a style of branding and in-window dressing that, in common with the rest of its estate, employs large scale indoor vinyl advertising and branding that will be wholly inappropriate in a conservation context and would become permissible under the deemed consent of the Control of Advertisement Regulations (SI 2007/783).
- As has been explained elsewhere, the commercial viability of extant businesses in the Stoke Newington and Church Street Conservation Areas is under direct threat from the proposed superstore and loss of car parking. Even the *perception* of loss of trade has a pre-emptive and direct effect on viability when business owners seek to 'quit whilst ahead'. Occupancy rates within the two Conservation Areas is high but if these dwindle, there will be pressure to allow amalgamation of units, destroying the fine grain of the largely single-unit retail premises. The amalgamated units will tend to attract chain-store supermarkets and restaurants and as well as destroying the independent small-unit character of the conservation areas the associated demands on transport due to delivery patterns, and customer profiles will have a severe negative effect on the general amenity and accessibility of the area.
- Such theoretical observations on the effect of larger units within a conservation area, the nature of the businesses they attract and the demands on transport were considered by the Planning Inspector in 2006 when an appeal in the Newington Green Conservation Area was refused (combined judgements APP/V5570/A/05/1193422 & 1193806). In it the Inspectors observes that a "failure to observe the scale of shops... would create a discordant feature in the street scene... which would be harmful to the character of the CA, with its more intimate, even domestic scale of shops". Importantly the Inspector is marking out the scale of the retail outlets as a defining characteristic of the (Newington Green) CA.
- Furthermore, and significantly, when challenged on the involvement of the planning system in suppressing competition, he asserted "it is legitimate for the local planning authority to seek to protect and strengthen established shopping centres. ... The addition of another shop... is bound to impact on the viability and vitality of the existing shops selling similar lines of goods".

Response to the Retail Statement

Overview

- Stoke Newington is well known and well regarded for its vibrant local economy and enviable diversity of businesses providing local residents with groceries. The Stokey Local campaign conducted a survey of the local shops in 2011 and found that 24 sell fresh vegetables, 22 sell fresh fruit, 19 sell fresh meat, 9 sell fresh fish, 10 have deli counters, 27 sell dairy products, 29 sell bread, 19 sell frozen food, 30 sell things for the larder, 25 sell alcohol, 22 sell household cleaning products, 2 are pharmacies, 20 sell newspapers and 32 sell confectionery. A new supermarket on the Wilmer Place site would be in direct competition with these businesses.
- This range of shops represents a more traditional High Street which has all but disappeared in much of the rest of London (and indeed the rest of the country) as supermarkets have come to dominate the retail scene and these convenience shops are a key part of Stoke Newington's unique character and attraction. There are serious concerns that these

businesses would be adversely affected by a large new supermarket being built in the heart of Stoke Newington.

- As the developer's own Retail Statement makes clear (3.2: Changes in Retail Composition – Stoke Newington District Centre), this convenience provision is already under threat, with the proportion of stores in Stoke Newington dedicated to groceries reducing over the past few years, likely due to the challenging economic environment and increasing rents (up 43% between 2001 and 2008 according to the London Town Centre Health Check Analysis, December 2009). A new supermarket in the centre of Stoke Newington would reduce this diversity.
- The Retail Statement attempts to back up these arguments with what it calls 'empirical evidence', however as is shown below this evidence is weak and contradictory. The rest of the document consists of a series of unsupported assumptions and assertions which are not backed up with any evidence at all and which make it difficult to have faith in the arguments that it is putting forwards.

Evidence for Shopping Habits in Stoke Newington

- The Retail Statement refers to Stoke Newington being 'dominated' by the Morrison's store but in the same paragraph states that it is on the 'periphery' and 'does not function as part of the core retail offer of the district centre'. The fact that the Morrison's is not part of the 'core retail offer' means that it can coexist well alongside the diverse independents which are located in the centre of Stoke Newington. Local residents can easily access the Morrison's if they need to do a main shop at a large format store but it does not overwhelm the small independents. A large supermarket located in the centre of the Stoke Newington District Centre would have a far more deleterious effect on these shops which are highly vulnerable to small changes in footfall and revenue.
- The Retail Statement suggests that "the findings of the Hackney Retail and Leisure Survey (HRLS) provide useful empirical evidence in understanding shopping patterns and habits", however this statement is not supportable because the HRLS does not offer sufficient granularity. The zones supposedly reflecting the shopping habits of the residents of Stoke Newington also including residents living well away and closer to other shopping centres (and understandably making use of them).
- For example, HRLS Zone 8 is comprised of three wards (Brownswood, New River and Lordship). Of these, Brownswood and New River are substantially closer to the Harringay Green Lanes Sainsbury's than they are to Stoke Newington District Centre so it is unsurprising that residents are making use of this store. It is highly unlikely that they would suddenly switch to a smaller and more distant Sainsbury's which does not have on site parking. Residents of New River ward also already have better access to the Sainsbury's on Stamford Hill than to Stoke Newington.
- This is confirmed by Sainsbury's own Nectar card data given in the Retail Statement however the conclusions given in the text are not borne out by the evidence provided. The diagrams given in Appendix 8 clearly demonstrate that for the Harringay and Dalston stores, very little of the takings (in the order of a few percent) come from customers travelling from Stoke Newington. Unsurprisingly, the closely located Stamford Hill store derives a substantial proportion of its takings from residents of Stoke Newington.
- The household survey is also heavily biased towards supermarket shopping and the concept of the 'main shop' and does not give a sufficiently informative insight into the use of smaller shops by Hackney residents. As such, while the HRLS Home Survey provides a good picture of the state of supermarket shopping habits amongst the residents of the borough of Hackney in 2004, it does not provide a sufficiently adequate picture of the state of supermarket and independent shopping habits of Stoke Newington residents in 2012 to draw the conclusions being drawn by the developers in the Retail Statement.
- Inspecting the HRLS Visitor Survey paints a very different picture of the people using Stoke Newington's facilities to that selected by the developer in the Retail Statement. When asked for the main and secondary purpose of their visit (Q1 and Q1b), 27% of respondents were

making use of the District Centre for 'shopping for food and groceries at shops other than supermarkets' as their main or secondary purpose for being there, while only 13% were there for 'supermarket shopping'. When asked '*Do you have any suggestions for how this centre can be improved?*' only 24% selected '*provide a better range of shops*' suggesting that in 2004 three quarters of people using Stoke Newington District Centre felt that the range of shops met their needs.

- The HRLS surveys were conducted in 2004 (8 years ago) and since they were undertaken the convenience retail scene has changed substantially in Stoke Newington with a Tesco Express, Sainsbury's Local, an Iceland and a Whole Foods arriving in the District Centre. During this time the Stamford Hill Safeway has also changed to a Morrison's and the Netto on Stamford Hill is now another Sainsbury's.
- In addition to these multiples, we have a diverse array of high quality fruit and veg shops, butchers, bakers and other grocery supplies in both the High Street and Church Street. The supermarkets in and around the Stoke Newington District Centre complement the local independent's food provision but their scale and location mean that these two aspects of the Stoke Newington convenience retail scene can coexist well side by side. A large supermarket located directly in the centre of Stoke Newington will irrevocably change this for the worse.

Impacts on Local Economy and Evidence for 'Linked Trips'

- The Retail Statement refers frequently to 'locally generated retail expenditure', suggesting that it is better for expenditure to happen in a supermarket locally than in a supermarket far away, however this does little to improve the local economy as supermarkets are extractive, drawing money *out* of local economies.
- Money spent in local independent shops is far more likely to stay in the local economy because independents tend to make use of locally supplied services (legal, accountancy etc) and the profits tend to stay in the local community, while supermarkets use centralised, in-house services and channel profits to distant shareholders.
- The Retail Statement also suggests that people will come to Stoke Newington in order to undertake their weekly main shop and at the same time will also visit other businesses in the area. It is very difficult to have much faith in this claim as supermarket customers visiting Stoke Newington to undertake their main shop of the week would not be arriving in cars and would be laden down with a week's worth of shopping making visits to further businesses inconvenient.
- The Tesco-funded study undertaken by academics from Southampton University[4], cited in the Retail Statement, found that while there were examples of high rates of linked trips in market towns (and where the supermarket had parking), the rate of linked trips in district centres was much lower.
- The Southampton study attempts to assess whether there is an adverse effect on the retail composition of district centres and market towns but it only considers a 12 month window after the supermarket opens. This is clearly too short a time for the long term impacts of a large supermarket opening in an area dominated by local independents and as such does not support the claim that it provides 'little support for widely held views linking supermarket development to the decimation of existing centres and their retail diversity. This decimation has been seen up and down the country and District Centres with the vibrancy and diversity of Stoke Newington are rare nowadays.
- The Retail Statement's estimates of trade draw found in Appendix 11 of the Retail Statement are also incredible. Appendix 11 claims that a mere £40,000 or 0.25% of its revenue will be drawn from local independents in the Stoke Newington District Centre, £20,000 or 0.1% from the Church Street Local Centre and £10,000 or 0.05% from the Stoke Newington Road Local Centre. It is very hard to place any stock in this figure given the proposal's size and location in the heart of Stoke Newington and the Statement's promotion of the concept of 'linked trips' and calls into doubt the entire table and the wider Statement.