

Steve Fraser-Lim
Planning Officer
London Borough of Hackney

by email

Friday 14 September 2012

Dear Steve

Objection by the Stokey Local campaign to applications 2012/2228–9

Re: 2012/2228 Land at Wilmer Place 193-201 Stoke Newington High Street N16 0LH
2012/2229 related Conservation Area consent

I write on behalf of Stokey Local, an informal, independent campaign group formed in 2011 in response to Newmark Properties first publicly mooted plans for a Sainsbury's supermarket and housing development on the land at Wilmer Place.

Stokey Local has no specifically defined membership or affiliations but instead exists through regular open meetings and online discussion forums to gather and focus information on the development of Wilmer Place, the opinions of the local residents, business community and amenity groups on the use of the space and to present a response which has the broad support of that community. Over 5000 residents, business owners and visitors to a wide range of local shops on the High Street and Church Street have signed up to support our effort, many of them providing direct input and ideas.

We have regularly re-evaluated the community's opinion in the light of modifications to the proposal and new information. However there remains a large consensus view that is opposed to the application in its current form, and the response below is our formal submission on the matter. In addition we have encouraged individuals and groups to make their own individual submissions to you with their own personal emphasis and arguments.



Nick Perry
on behalf of Stokey Local

Consultation

The current application comes after two brief consultation event with the general public and further meetings with special interest groups. Although organized by the retail tenant's (Sainsbury's) retained PR consultants, Sainsbury's has not fully engaged directly with the local community. The developers and Sainsbury's have not held a public meeting to discover how the community wanted the site to develop. This no doubt explains why the proposals and final application have near-universal opposition amongst the local community.

Sainsbury's and the developer do not 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, and whilst phrases such as 'strongly welcomed' are used by the applicants in relation to these improvements, these relate to the first proposal and the current application still has massive shortcomings.

The revised proposals that form the basis of this application 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. Awareness of this second exhibition was very low amongst local residents and businesses. 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* S1.3.

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, on all technical evidence, 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 Gyrotory.

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 gyrotory 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 gyrotory, 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.

The limited vehicular access presents potential difficulties for emergency site access, in particular from fire appliances. The only viable route into the main body of the site for large vehicles is through Wilmer Place, this narrow route becomes highly vulnerable to being temporarily blocked by loading and other vehicle movements that will continue to take place. There will be limited access to the main mass of the building from the High Street and nothing viable from the two sides bound by Abney Park Cemetery. This should be subject to a detailed professional fire officer's opinion on suitable density of permanent and transient population on the site given the development's access constraints.

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.

s4.11 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).

s5.9 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 S3.6 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 this proposal.

S3.3 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. We express this more fully elsewhere. 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 (s3.8) “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 Town Centre, and *Stokey Local’s* own 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. The unique characteristics of Stoke Newington and the threat this proposal presents are explored elsewhere.

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 nearby, 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 types 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, s3.9 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 as 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 (S3.9): "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 (teh combine 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. This fine grain independent retail is what Stoke Newington is known for. It's 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 it's 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 S3.55 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, in 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 neither 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 are 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 with 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 source 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.

S3.1 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

S1.1 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 the adjacent Abney Park Cemetery, the significant and important ecology of which is under threat from this development.

In s3.33 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.

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 local professional expert Russell Miller Arboriculture whose original and supplementary submissions we support and summarise as an objection on the following grounds:

Failure to conduct 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.

The proposed development pays no regard to the valuable ecology of the site, specifically the woodland edge to the Abney Park Nature Reserve/Site of Metropolitan Importance for Nature Conservation. If permitted the development will completely destroy this woodland edge and its associated flora and fauna. This includes protected species.

The development breaches LDF Core Strategy planning policy, the Hackney and London Biodiversity Action Plans and Hackney's statutory duty to protect biodiversity.

We also support the objection made on 20 August 2012 by Chris Sumner, jointly on behalf of the London Parks & Gardens Trust and Garden History Society.

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.

S3.37 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 proposal threatens to damage the Cemetery in three key ways: ecologically, aesthetically, through overlooking and economically.

The main ecological arguments, as mentioned elsewhere are left to 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 its removal couldn't fail to improve the setting.

However 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 its surrounding. It also destroys the seclusion, the peace and amenity of privacy that neighbouring parts of the Cemetery offer visitors. 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 stylings 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. The S8 of the 2004 *Stoke Newington Conservation Area Appraisal* the threats to the CA include the decay of local buildings due to low profitability of the small independent shops. Any threat to that profitability will pose a real threat to the CA which would rapidly lead to urban blight.

Even the *perception* of loss of trade has a pre-emptive and direct effect on viability when business owners seek to 'quit whilst ahead'. The occupancy rate 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".

Further detailed arguments on heritage have been made by the Stoke Newington Conservation Areas Advisory Committee (SN CAAC) who have had direct contact with the developers and their agents and consultants at two separate meetings during this proposal's gestation. We have seen their draft report and support their detailed observations and objection, which in summary are:

A detrimental effect on the character and environment of Abney Park Cemetery. The visual impact, light pollution and shadow cast by the development are all substantially detrimental to the seclusion and 'rural quality' [2004 CAA].

Over-development, mass and height. The view from High Street of the Cemetery gates and the Victorian terrace will be dominated by a 7 story building, unsympathetic in style and of inappropriate mass and height.

Shadow most likely in excess of that outlined in the application report.

Radical departure from the historical development of the site. The loss of historical open space in the North Western corner which has existed for a very substantial period and contributes to the open feel of the Cemetery.

The proposed amalgamation of the five units on the High Street is inappropriate in the context of the existing terrace.

Detrimental effect of a single large scale retailer on the Conservation Area which was established in 1983 in part to preserve the a High Street characterised by local independent shops and cafes. The consequential danger of urban blight.

In its draft objection SN CAAC rightly observes: “A Conservation Area is also, if it is to work, an expression of a local community. The very strong opposition to the proposed supermarket is therefore worrying.”

Retail

Stoke Newington is well known and well regarded for its vibrant local economy and enviable diversity of businesses providing local residents with groceries. *Stokey Local* conducted its own detailed survey of the local convenience 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 dry goods, 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 convenience businesses.

This range of shops represents a more traditional High Street which has all but disappeared elsewhere in London (and indeed the rest of the UK) as supermarkets have come to dominate the retail sector. These small convenience shops are a defining part of Stoke Newington’s unique character and attraction. These established businesses would be adversely affected by a competing, large supermarket in the heart of Stoke Newington District Town Centre.

As the developer’s own *Retail Statement* makes clear (S3.2: Changes in Retail Composition – Stoke Newington District Centre), this diverse 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 will reduce this diversity.

The *Retail Statement* cites ‘empirical evidence’ that is weak and contradictory and asserts a series of totally unsupported assumptions, which, without evidence, are difficult to have any faith in.

Evidence for shopping habits in Stoke Newington

The *Retail Statement* claims Stoke Newington is ‘dominated’ by the Morrison’s store but in the same paragraph asserts that it is on the ‘periphery’ and ‘does not function as part of the core retail offer of the district centre’. Indeed as Morrison’s is not part of the ‘core retail offer’, it coexists well alongside the diverse independent convenience stores located in the centre

of Stoke Newington. This large format Morrison's is easily accessible for a 'main shop' and yet does not overwhelm the small independents. A further large supermarket located more centrally in the Stoke Newington District Town Centre would have a far more deleterious effect on these shops which are highly vulnerable to small reductions 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 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 comprises three wards. Two of those, Brownswood and New River, are substantially closer to the large Sainsbury's at Harringay Green Lanes than to Stoke Newington District Town Centre so it is unsurprising that residents are making use of this store. It is highly unlikely that they would switch to a smaller and more distant Sainsbury's which does not offer on-site parking. Similarly, residents of New River have better access to Sainsbury's at Stamford Hill Broadway with its underground car park, than to Wilmer Place..

This is confirmed by Sainsbury's own Nectar card data cited in the *Retail Statement*. Yet the conclusions then drawn are not borne out by that evidence. The diagrams given in Appendix 8 clearly demonstrate that for the Harringay and Dalston stores, very little of the takings (of the order of a few percent) come from customers travelling from Stoke Newington. Unsurprisingly, the more convenient 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'. It 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 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 support the conclusions of the *Retail Statement*.

In fact, the HRLS Visitor Survey paints a very different picture of the people using Stoke Newington's facilities to that painted 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 Town 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'. In other words, in 2004 three quarters of people using Stoke Newington District Town Centre felt that the range of shops met their needs.

The HRLS surveys were conducted in 2004 and in the eight years since, the convenience retail scene has changed substantially in Stoke Newington with Tesco Express, Sainsbury's Local, Iceland and Whole Foods stores arriving in the District Town Centre. Also during this time the three large Stamford Hill Safeway, Somerfield and Netto supermarkets have all

been substantially refurbished and rebranded as Morrisons, Sainsburys and ASDA respectively. All three retain car parks.

In addition to these multiples, we have a diverse array of high quality greengrocers, butchers, bakers and other grocery supplies on both the High Street and Church Street. The supermarkets in and around the Stoke Newington District Town 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 happily coexist 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* repeatedly refers to 'locally generated retail expenditure', suggesting it is better for cash to be spent in a local supermarket than in one far away. But in fact this does little to improve the local economy as national chain supermarkets, regardless of how local they might be 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 centralized, in-house services and channel profits to distant shareholders.

The *Retail Statement* also suggests visitors who come to Stoke Newington for a weekly 'main shop' will use the opportunity to 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' would mostly be arriving on foot and be burdened with the proceeds of a weekly shop making visits to further retailer inconvenient and unlikely..

The Tesco-funded study undertaken by academics from Southampton University, 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 car 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 only considers a 12 month period after a supermarket opens. The long term impact of a large supermarket opening in an area dominated by local independents is not considered. The implication that the study dismisses the 'widely held views linking supermarket development to the decimation [sic] of existing centres and their retail diversity' is erroneous. This destruction can be seen across the country. District centres with the vibrancy and diversity of Stoke Newington are now a rarity.

The estimates of trade draw found in Appendix 11 of the *Retail Statement* are not credible. It claims that a mere £40,000 or 0.25% of its revenue will be drawn from local independents in the Stoke Newington District Town Centre, £20,000 or 0.1% from the Church Street Local Shopping Centre and £10,000 or 0.05% from the Stoke Newington Road Local Shopping 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 unproven concept of 'linked trips' and calls into doubt the entire table and the wider Statement.

END