

Our ref: J035759/001

Development Management  
London Borough of Haringey  
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London  
N22 8HQ

31 March 2017

Dear Sirs

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**  
**THE MALL, 159 HIGH ROAD, WOOD GREEN, N22 6HE**  
**APPLICATION FOR FULL PLANNING PERMISSION**  
**PLANNING PORTAL REF: PP-05609210**

On behalf of our client, The Mall Limited Partnership, we hereby submit a planning application for development and change of use of former petrol filling station site at junction of Mayes Road and Caxton Road to create a new temporary car park for a period of 10 years to serve existing shopping centre to include closure of existing access points on Mayes Road and Caxton Road and creation of a new single access point from Caxton Road, together with new landscaping provision; and refurbishment and enhancement of existing facades and creation of new escape stair all in association with the reconfiguration of existing retail space within the shopping centre to create a new food store. The application comprises the following:

- Application form;
- Site location plan ref: 050\_001 Rev C;
- Block/site plan ref: 050\_012 Rev G;
- Existing photos sheet ref: 050\_002;
- Existing ground floor plan ref: 050\_003 Rev A;
- Existing first floor plan ref: 050\_004 Rev C;
- Existing SW Elevation ref: 051\_001 Rev A;
- Existing NW Elevation ref: 051\_002 Rev A;
- Existing Sections ref: 052\_001 Rev A;
- Proposed ground floor plan ref: 050\_005 Rev L;
- Proposed first floor plan ref: 050\_006 Rev G;
- Proposed SW Elevation ref: 051\_003 Rev F;
- Proposed NW Elevation ref: 051\_004 Rev D;
- Areas ground floor ref: 050\_010 Rev D;
- Proposed Visual ref: 050\_007 Rev A; (for illustrative purposes);
- Proposed sections ref: 052\_002 Rev A;
- Highway works ref: 050\_013 Rev A;
- Proposed Drainage Arrangement Car Park ref: 100 P2;
- Soft landscape strategy ref: L-001
- Planning statement - incorporated into this cover letter;
- Design and access statement;
- Preliminary geoenvironmental risk assessment;

- Drainage strategy report (to follow);
- Transport statement, including swept path analysis;
- Air quality assessment;
- Tree report; and
- CIL Information form.

We confirm that a cheque for the requisite planning application fee of £385 will be submitted by post under separate cover. We confirm that our client has signed a Planning Performance Agreement, which has been completed and submitted to the Council under separate cover today.

The only elements requiring planning permission relate to the laying out of the new car park and provision of amended access onto Caxton Road, provision of new escape stair and changes to the elevations of this part of the shopping centre. The remainder of the works are internal and relate to the reconfiguration of existing retail floor space and do not involve change of use or the creation of additional floor area. However, as agreed with officers we have included existing and proposed floor plans and sections in this area and have also included the area of the new store within the application site to provide context for the proposals.

The application follows a series of pre application discussions under Council Pre App Ref: PRE/2015/0314. An initial meeting was held on 13 November 2015, following which a summary pre application advice note was received. A follow up meeting was then held on 21 January 2016 to present adjusted proposals in response to officer comments and a note of the meeting was circulated. Since that time our client has held a number of meetings/discussions with officers regarding the Council's longer term aspirations for the town centre and how this proposal can fit with the Council's plans in this regard.

Our client is conscious of the Council's emerging policy objectives to redevelop the town centre as set out in its Preferred Option draft Area Action Plan and also its aspirations to improve east west pedestrian links between the High Street and Haringey Heartlands. The application proposals provide for an enhanced pedestrian route with resurfaced footpath and landscape provision along the Caxton Road and Mayes Road boundaries to the site, together with resurfaced cycle way along Caxton Road, to accord with the Council's objectives in this regard. It is also intended that the use of the car park will be for a temporary period of 10 years so as not to fetter the longer term development potential of the site should the Council wish to bring forward wider proposals for the redevelopment of the town centre.

We set out below our planning statement in support of the application under the heads of background to proposal, Market Hall refurbishment, background to ALDI, planning policy context and planning merits.

### **Background to Proposal**

As part of an ongoing programme of investment, our client has agreed terms with ALDI Stores Limited to occupy part of the existing Market Hall on the ground floor of the shopping centre as a food store in reconfigured space to comprise 1,581 sqm gross internal floor area at ground floor to comprise retail, storage and welfare space.

The adjacent vacant former petrol filling site on the corner of Caxton Road and Mayes Road will be laid out for a shared shopper car park serving the new store and wider centre, which will comprise 70 car parking spaces, including 5 disabled spaces positioned close to the entrance to the new store. The former access to the petrol filling station site from Mayes Road will be closed off with the access onto Caxton Road re-positioned.

The proposals will include the refurbishment and enhancement of the South West and North West facades to the shopping centre fronting Mayes Road and what will be the new car park to identify the new store and improve the overall appearance of the shopping centre. Detail on the design approach is included within the accompanying Design and Access Statement. The proposed new facade treatment and refurbishment will open up the frontage in this location and improve the visual amenity of the streetscape making it more inviting to pedestrians and shoppers alike. The proposed car park will provide a shared facility for both visitors to the food store and other visitors to the centre including the reconfigured Market Hall.

Whilst 70 surface level car spaces are to be created to serve the new food store, this should be considered in the context of the loss of car parking spaces within The Mall shopping centre car park as a result of planning permission granted to The Mall on 8 July 2016 under planning permission ref: HGY/2015/3255 for change of use of Alexandra House from Class B1 office to Class C1 Hotel for Travel Lodge. This scheme, which is nearing completion, includes external works involving an extension into the existing second floor car park resulting in the loss of 3 existing car parking spaces and a new build element encompassing the existing fifth floor plant room and fifth floor car park resulting in the loss of 50 existing car parking spaces.

### **Approach to Market Hall**

The existing Market Hall on the ground floor of the centre in this general location has been a part of the shopping centre since opening. The Market Hall currently operates in a dated environment having been last refurbished in 2002 following our client's purchase of the centre. Whilst not forming part of the application proposals due to comprising internal works, our client proposes to invest in its reconfiguration and refurbishment to position it going forward as part of the overall proposals. The investment proposals provide an opportunity to improve the environment of the market for customers albeit within a smaller facility. It is also expected that the new ALDI store will act as an additional 'anchor' attracting customers to this part of the shopping centre, thereby increasing footfall and adding to the vitality of this part of the shopping centre.

### **Background to ALDI**

ALDI, an abbreviation of Albrecht Discount, is one of the world's leading grocery retailers. ALDI is present in Europe, the USA and Australia, and has around 4,700 stores world-wide. The Company first entered the UK market in 1990 and currently has 600 trading stores nationwide and around 100 in the Republic of Ireland. The Company's philosophy is to provide high quality products at discounted prices within a pleasant shopping environment. ALDI does not necessarily sell goods at the lowest possible prices, but rather retails the highest quality goods at the lowest possible prices. Discounted prices are generally achieved through bulk buying and economies of scale, specialisation in the number of lines offered and maximising efficiency within the operation of the stores.

ALDI stores are modest in scale and sell only a limited range of branded goods, which are only sold when, in ALDI's opinion, the product cannot be 'bettered'. Local and regional sourcing of products, particularly for fresh produce and bakery goods, is an important element within the range. ALDI does not sell cigarettes or lottery tickets and stocks only a small range of branded wines and spirits. There is a limited range of breadlines and a small number of boxed cakes. The ALDI format does not include specialist 'concession' counters such as a butcher, fishmonger, or chemist counter, which are commonplace in larger supermarket formats.

This is an important distinction with ALDI. Unlike the larger formats, the reality is ALDI is not a 'one-stop-shop', meaning customers have to visit other shops and services to complete their shopping trip, for example when purchasing a particular branded product or should they wish to visit a specialist service, such as a butcher. This is particularly important given the adjacency of what will be the newly refurbished Market Hall, and as such, ALDI complements, rather than competes with, existing traders and generates considerable propensity for linked trips and associated spin-off trade.

ALDI regularly receives widespread recognition of the quality of its brand. In 2016, ALDI won Gold in the prestigious The Grocer awards for both the Grocer of the Year and Own Label Range of the Year ALDI categories.

### **Planning Policy Context**

We set out relevant the national and development plan policy context for consideration of the proposal below.

#### National Planning Policy

National planning policy is contained in the National Planning Policy Framework (NPPF) which was published in March 2012. It sets the Government's overarching policies for the planning system with the aim of ensuring it helps to achieve sustainable development.

Paragraph 7 indicates that there are three dimensions to sustainable development, namely economic, social and environmental. This gives rise to the need for the planning system to perform a role under each of these headings. It is noted that the economic role should be one of contributing to building a strong, responsive and competitive economy by ensuring inter alia that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.

Paragraph 9 indicates that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life including making it easier for jobs to be created in cities, towns and villages; and improving the conditions in which people live, work, travel and take leisure.

Paragraph 14 confirms that a presumption in favour of sustainable development is at the heart of the NPPF and should be seen as a golden thread running through both plan-making and decision-taking. It is noted that for decision-taking this means approving development proposals that accord with the development plan without delay.

Paragraphs 18 to 22 refer to building a strong, competitive economy. Paragraph 18 notes that the Government is committed to securing economic growth in order to create jobs and prosperity. Paragraph 19 indicates that the planning system should do everything it can to support sustainable economic growth and should operate to encourage and not act as an impediment to sustainable growth. Paragraph 20 describes how local planning authorities should plan proactively to meet the needs of business and support the development needs of business and support an economy fit for the 21 Century.

Under the main heading delivering sustainable development, paragraphs 23 to 27 refer to ensuring the vitality of town centres. Paragraph 23 describes how planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of town centres over the plan period. It is noted that in drawing up Local Plans, local planning authorities should inter alia promote competitive town centres that provide customer choice and a diverse retail offer.

Paragraph 23 of the NPPF indicates that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In particular, it is noted that local planning authorities in drawing up plans should pursue policies to support the viability and vitality of town centres; promote competitive town centres that provide customer choice and diverse retail offer; retain and enhance markets ensuring that markets remain attractive and competitive; and allocate a range of sites to meet the scale and type of retail and other uses needed in town centres. Paragraph 24 indicates that local authorities should apply the sequential test to planning applications for main town centres uses requiring such uses to be located in town centres, then edge of centre sites and only if suitable sites are not available should out of centre sites be considered.

#### Development Plan Policy

The statutory development plan for the site comprises the London Plan (March 2016), the Haringey Local Plan: Strategic Policies Development Plan Document (DPD) (2013) and the saved policies of the Haringey Unitary Development Plan (UDP) (2006).

Haringey Council is also in the process of preparing alterations to the Strategic Policies DPD and preparing Development Management Policies and Site Allocations DPDs. These documents were submitted to the Secretary of State in draft on 24 May 2016 and were the subject of an Examination in Public over the summer last year. Following the Examination, a list of proposed modifications was published for public consultation between 18 November 2016 and 13 January 2017 and the representations submitted and Council's responses have been forwarded to the Examination Inspector. The Inspector's report is currently awaited by the Council.

The Council is also in the early stages of preparing an Area Action Plan for Wood Green, which in due course will form part of the development plan. The Council published its Preferred Option draft Area Action Plan for public consultation which has run from 14 February to 31 March. We understand that it is proposed

to carry our formal consultation on the submission draft document in the summer of this year with a view to submission to the Secretary of State in the autumn.

We note that within the draft Area Action Plan, The Mall shopping centre to the west of High Road, including nearby residential properties in Caxton Road and Mayes Road, forms proposed site allocation WG SA 9: Wood Green Town Centre West. The proposed allocation is for redevelopment of existing shopping city and surrounding residential properties to create a refreshed town centre around a new Town Square, with new mixed use development. The Council has consulted with our client on the options for the regeneration of Wood Green as part of the preparation of the Area Action Plan and discussions are ongoing.

We describe the relevant adopted development plan policies below.

### The London Plan

Wood Green is identified as one of 13 Metropolitan Centres across London whilst the Haringey Heartland/Wood Green area is also designated as an Area of Intensification. Policy 4.7 refers to retail and town centre development and states that the Mayor supports a strong partnership approach to assessing need and supporting capacity for retail in town centres. In taking planning decisions, the scale of retail development should be related to the size, role and function of the town centre; and retail development should be focused on sites within town centres in the first instance having regard to the sequential approach.

Policy 4.8 of the London Plan refers to supporting a successful and diverse retail sector and related facilities and services. At the strategic level, the policy indicates that the Mayor will, and boroughs and other stakeholders should, support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services Londoners need. The policy notes that a proactive approach should be taken to planning for retailing including bringing forward capacity for additional comparison goods retailing; supporting convenience retail to secure a sustainable pattern of provision; and supporting the range of London's markets to improve their management, enhance their offer and contribute to the viability of town centres. Paragraph 4.48 notes that larger centres are appropriate locations for accommodating comparison goods expenditure. It is noted that provision to meet need for convenience goods can be made in larger centres, although smaller centres especially district neighbourhood and move local centres are particularly suitable for accommodating growth in this regard, providing new shops are of an appropriate scale.

The London Plan parking standards are set out in detail in the accompanying Transport Statement. Maximum car parking standards are set out for development including retail development plus requirements related to the provision of dedicated blue badge parking bays, electric vehicle charging points and minimum standards for cycle parking provision.

### Haringey Planning Policy

The saved policies of the UDP confirm that the key objectives for the Borough's town centres are to ensure that they are easily accessible and meet the needs and requirements of its people; and to ensure that people have access to the full range and quality of goods and services. The saved policies include criteria for the assessment of out of centre development (Policy TCR2), protection of shops in the town centres (TCR3) and criteria for the assessment of restaurants, drinking establishments and hot food takeaways (TCR5).

Policy SP10 of the Local Plan: Strategic Policies refers to town centres. It notes that the Council will promote the distribution of retail growth to meet the required additional gross comparison (13,800 sqm) and net convenience (10,194 sqm) goods floor space by 2016. The majority of this additional retail growth will be met in Wood Green and the five District Town Centres. The policy describes how the Council will promote and encourage development of retail and other town centre uses according to the borough's town centre hierarchy and how Wood Green will be the principal focus of growth accommodating an extensive range of types of development, which should help shape Wood Green into a thriving and vibrant centre for North London.

Paragraph 5.3.2 of the supporting text to the policy indicates that one of the strategic priorities for north London is to enhance the attractiveness of town centres to consumers. It is noted that Wood Green is one of

eleven Metropolitan Town Centres in London. Paragraph 5.3.3 confirms that the Council's objective is to strengthen the role of Wood Green and the borough's district centres, including as accessible locations for retail and other town centre uses, and to enhance the environmental quality and attractiveness of the borough's town centres.

Supporting paragraphs 5.3.20 to 5.3.22 refer to improving town centres. It is noted that investment into the public realm and historic environment will support the economic competitiveness of town centres

### **Planning Merits**

Our client's proposals will regenerate this part of The Mall shopping centre to the wider benefit of the town centre. They will benefit the internal Mall environment and external environment to Mayes Road and Caxton Road. This is recognised in the Council's pre application response which confirms that the principle of the proposal is broadly in line with the aspirations set out in the Council's published and emerging planning policy documents and the regeneration of the area is welcomed.

Reconfiguration of the existing space for a national food retailer will provide an additional 'anchor' store for the centre, thereby increasing footfall and attracting shoppers to this part of the town centre. As noted above, the new ALDI store will generate considerable propensity for linked trips and spin off trade, which will help underpin the future success of the reconfigured Market Hall.

The proposals will utilise a vacant unsightly former petrol filling station site for car parking convenient to serve the new food store and this part of the shopping centre generally, whilst opening up and greatly improving the visual amenity of the area. Access to sufficient grade parking is essential to ensure the new store trades well (and thus attracts trade to the centre) and can compete with less restrained out of centre stores. It is proposed that the new car park will be a shared shopper facility for both ALDI and other shoppers to the centre. As noted above, whilst 70 spaces are to be provided, the majority of this provision is off set by the loss of 53 spaces within the centre car park itself as part of the current development to construct a Travel Lodge hotel at Alexander House. As noted above, the car park will be for a temporary period of 10 years so as to not fetter the potential longer term aims of the Council to bring forward wider development proposals for the town centre

The proposals accord with national and development plan policy related to promoting competitive town centre environments and supporting a successful and diverse retail sector, whilst also enhancing the overall vitality and viability of the town centre. The proposal will also assist with the development plan objectives of supporting the range of London's markets to enhance their offer and contribute to the vitality of town centres. Whilst not forming part of the application, our client's overall proposals include investment in reconfiguring and refurbishing the Market Hall to improve its environment for customers. Meanwhile, the proposed refurbishment and enhancement of the shopping centre facade to Mayes Road will greatly improve the environment and visual amenity of this part of the town centre to accord with the Council's objectives of improving the overall environment of town centres.

Our client has responded to officer comments at the pre application stage regarding the provision of a welcoming east west route along the site to improve the linkage between the town centre and the Haringey Heartlands. The application proposals will provide public realm improvements with provision for an enhanced pedestrian footpath and resurfaced cycle way along Caxton Road with new paving along both Caxton Road and Mayes Road, together with associated landscape improvements along the boundary of the site. The principles of the proposals are set out within the application and accompanying Design and Access Statement and it is envisaged that the detail of the improvements and associated landscaping will be agreed with the Council as a condition of the application.

As advised by the Council through the pre application process, blue badge parking, cycle parking and vehicle charging points will be provided to London Plan standards and the details are set out in the accompanying Transport Statement.

To accord with the Council's pre application advice, the application is accompanied by a Design and Access Statement, Transport Statement (including swept path analysis), Drainage Strategy, Geoenvironmental Risk Assessment and Air Quality report. We have also included a tree report in respect of the existing tree on the corner of Mayes Road and Caxton Road to demonstrate that the tree can be retained as part of the new

paving works. The submitted reports demonstrate that the proposed development is acceptable having regard to these technical aspects.

We trust that the Council will be supportive of the proposals and look forward to receiving an acknowledgment of receipt of the application. If you have any queries or wish to discuss any aspect of the application, please do not hesitate to contact either Paul Woods or Jamie Bryant of this office.

Yours faithfully

*Paul Woods*

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**Planning Director**  
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