

Statement of Case

Planning Appeal on Behalf of Aldi Stores Ltd

Refurbishment, Extension and External Alterations to Existing Non-Food Retail Unit to Enable it to Trade as Part Foodstore and Part Non-Food Retail Unit, Alongside Modifications to Existing External Garden Centre, Car Parking Layout, Landscaping, and Other Associated Site Works

Homebase, Sturlas Way, Waltham Cross, EN8 7BF

January 2022

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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Statement of Case ('SoC') has been prepared and submitted by Avison Young ('AY') on behalf of Aldi Stores Limited ('Aldi') in support of an appeal against the refusal of planning application reference. 07/21/0519/F by Broxbourne Borough Council ('Broxbourne BC') at Homebase, Sturlas Way, Waltham Cross, EN8 7BF. The description of development of the detailed planning application is as follows:

"Refurbishment, extension and external alterations to existing non-food retail unit to enable it to trade as part foodstore and part non-food retail unit, alongside modifications to existing external garden centre, car parking layout, landscaping and other associated site works".

1.2 The planning application to which this appeal relates was submitted to Broxbourne BC on 27th April 2021. It was validated on the same day and was given a target determination date of 27th July 2021. On Thursday 15th July 2021 the applicant's agent received correspondence from Broxbourne BC stating that the planning application was to be determined at the Council's Planning and Regulatory Committee meeting of 28th July 2021. The officer recommendation (as set out in the Committee Report) was one of refusal and members of the Planning and Regulatory Committee followed this officer recommendation at the meeting of 28th July 2021. The Decision Notice was issued by Broxbourne BC on 9th August 2021. A copy of the Decision Notice is attached at **Appendix I** for reference, whilst the Committee Report forms **Appendix II**.

1.3 This document constitutes the Appellants' Statement of Case. It outlines the case that will be advanced by the Appellants for consideration as part of the appeal. Following on from this introductory section, the Statement is structured as follows:

- Section 2 describes the appeal site and its surroundings;
- Section 3 summarises the planning application proposals;
- Section 4 outlines the appellant's request for an Inquiry procedure;
- Section 5 sets out the planning policy context;
- Section 6 provides the reasons for refusal;
- Section 7 outlines the case for the appellants;
- Section 8 makes a request for the Proposed Site Plan to be substituted as part of the appeal; and,
- Section 9 provides overall conclusions.

2. Site Description

- 2.1 This section describes the site's location, its surroundings, planning history, and the specific characteristics of the site itself.

Site Location

- 2.2 The planning application site takes the form of a freestanding retail unit (Homebase) and its associated external sales area, storage areas, car parking, vehicular access/egress and landscaping. It is located west of Sturlas Way, Waltham Cross (EN8 7BF), immediately south-west of its junction with Winston Churchill Way (A121).
- 2.3 The planning application site is wholly within the northern boundary of 'Waltham Cross town centre' (as defined by the policies map which supports the Borough of Broxbourne Local Plan, June 2020). It is therefore classified as an 'in-centre' location in town centre policy terms and this is reflected in the Council's Planning Committee Report (see Paragraph 8.2). Accordingly, the site is in close proximity to a wide range of existing retail, leisure and commercial uses, as well as public car parking facilities and public transport modes (including bus and rail) – reflecting its town centre location.

Site Description and Features

- 2.4 The application site is broadly rectangular in shape and extends to approximately 1.2ha in size. Vehicular access / egress is currently taken from the south-eastern boundary of the site from a junction with Sturlas Way. Sturlas Way links directly to the A121 (Winston Churchill Way / Monarchs Way) immediately north of the site and also to Park Lane to the south of the site. Both Monarchs Way and Park Lane provide pedestrian linkages to the other shops and services of Waltham Cross town centre.
- 2.5 The site as existing contains a square shaped, large-format non-food retail unit which is occupied by Homebase – a national-multiple home improvement retailer. This building occupies a central position within the site and backs onto the southern boundary, facing east. Car parking wraps around the building to the north and east (providing some 192 spaces in total), whilst to the west is an enclosed, part covered / part open-air 'garden centre' – for plants and outdoor goods sales. Also on the western boundary (south-western corner of the site) is the retail unit's servicing area, which is accessed via a servicing road immediately south of the building and adjacent to the southern boundary.
- 2.6 The building itself, which is two storeys in height, extends to 3,435 sq. m Gross Internal Area ('GIA') at ground floor level, with a mezzanine floor of 884 sq. m (i.e. 4,319 sq. m total). It is understood that the net sales area of the building is 2,565 sq. m at ground floor level and 739 sq. m at mezzanine level (i.e. 3,304 sq. m total). The unit's associated, open, outdoor garden centre sales area extends to approximately 1,398 sq. m. Finally, the retail unit currently has a projecting single-storey lobby on its eastern elevation which extends to 73 sq. m GIA.
- 2.7 The building is of steel frame construction with a mixture of external finishes, including brick and high level profiled cladding. On the eastern and northern elevation of the building, the high level cladding is cloaked with a net banner.
- 2.8 In relation to boundary treatments and landscaping, there is a landscaping strip along the site's eastern boundary with Sturlas Way. This includes a number of small trees and one larger one at the

north-eastern corner of the site. A line of well-established coniferous trees is positioned along the site's southern boundary.

Site Surroundings

- 2.9 In terms of the site's surroundings, to the north is the A121 dual-carriageway (Winston Churchill Way), beyond which is a public house (The Vine) and an established residential area. To the west of the site is another densely populated residential area comprising terraced and semi-detached two-storey dwellings, this includes Leven Drive and Leven Close. Immediately south of the site is Ruthven Avenue, a residential street the gardens of which back onto the application site.
- 2.10 To the east and south-east of the site, on the opposite side of Sturlas Way, is the wider town centre of Waltham Cross. Immediately east is a three-storey apartment building with office uses at ground floor level. South of this use (south-east of the site) is a Wickes home improvement store and its associated car parking. Further south again (less than 100m from the site) commences Waltham Cross' high-street, a pedestrianised street which extends some 500m south and is flanked on both sides by retail, leisure and service uses.
- 2.11 The town centre contains over 150 unit shops and some 39,000 sq. m of floorspace. This includes a number of national multiple retailers including Argos, Boots, W H Smith, New Look, Superdrug and Vodafone, amongst others. Many of these retailers are housed within the centre's covered shopping mall – The Pavilions Centre. The town centre also benefits from two existing foodstores in the form of Lidl at the very southern end of the centre and a Sainsbury's supermarket contained within the Pavilions Centre.

Accessibility

- 2.12 Direct vehicular access to the site is provided by Sturlas Way on the eastern boundary, with this road linking to the A121 immediately north of the site. The A121 (Winston Churchill Way) is an arterial vehicular route into Waltham Cross from the east / west and a road which ultimately connects the settlement to the M25 to the south. The site clearly has a prominent location in relation to the local road network from which it is readily accessible.
- 2.13 The site is accessible to pedestrians, cyclists and users of public transport by existing infrastructure. The nearest bus stops are 120m to the north of the site on High Street and provide services to Hertford and Cheshunt in the north, Waltham Abbey in the East, Waltham Cross further south and Potters Bar to the east. The site is located 350m south of Theobalds Grove Train Station, which provides a direct regular service to Cheshunt and central London. It is also 700m north-west of Waltham Cross train station, which provides a services to central London, Hertford, Bishops Stortford and Stratford.
- 2.14 The application site is accessible to pedestrians by existing footpaths and the wider town centre (which is largely pedestrianised) is located immediately south-east of the site. In light of the local pedestrian facilities present, the site is evidently well connected to the local pedestrian network with opportunities for customers to make trips by foot. There are also opportunities for future staff members to walk to work via the closely connected residential areas.
- 2.15 It should be noted that the application site is also accessible by bicycle. Given that the roads local to the site are urban in character, cycling provides the opportunity to access the site by a sustainable

mode of transport. Cycle parking for both staff and customers are already present at the Homebase unit and are proposed in accordance with the prevailing guidance as part of the foodstore development.

- 2.16 In summary, the application site is readily accessible by private car and other motorised vehicles (such as heavy goods vehicles). It is also easily accessible by public transport, bicycle and on foot from the surrounding residential areas, given its town centre location.

Other Site Constraints

- 2.17 The Site is free of physical or environmental constraints. The site's building is not listed and nor is it located within, or in close proximity to, a Conservation Area. The Environment Agency Flood Risk Mapping shows the site to fall within Flood Zone 1 ('low probability').

Planning History

- 2.18 A desktop planning history search of the application site has been undertaken which revealed the following relevant planning permissions associated with the site:
- [07/14/0265/AC](#) sought permission for the re-branding of the store with internally illuminated fascia signs, non-illuminated pole signs, totem sign and window vinyl signs. Planning permission was granted in May 2014.
 - [07/09/0669/E](#) sought permission for the continued use of land within the site as a hand car wash without compliance with Condition 1 of planning permission [7/1017/07/F/WX](#) dated 28.12.07 (Condition 1 sought the discontinuation of the use by 21st December 2009). Planning permission was granted in November 2009.
 - [7/1017/07/F/WX](#) sought permission for a hand car wash and valeting services in the car park of the site. Planning permission was granted in December 2007.
 - [7/0757/05/F/WX](#) applied to vary Condition 18 of planning permission (Ref. 7/0383-84) to allow the sale of all non-food items from the existing retail unit. Planning permission was granted in October 2005.
 - [7/0717/02/F/WX](#) sought permission for a rear conservatory and replacement side canopy. Planning permission was granted in September 2002.
 - [7/411/2001](#) sought permission for a side extension to the garden centre with additional doors. Planning permission was granted in September 2001.
 - [7/148/1995](#) sought permission for the demolition of the garden centre wall and construction of new wall and resurfacing of car park. Planning permission was granted in April 1995.
 - [7/383-84](#) sought permission for the erection of a single storey retail store with open air garden centre and ancillary car parking. Permission was granted in May 1984. This is the original planning permission at the site.

- 7/632/1982 Sought the replacement of existing buildings by erection of 5,639.4 sq. m (60,701 sq. ft) buildings for Class A1 retail use - excluding sale of food / car parking and temporary garden centre. Permission was granted in February 1984.
- 2.19 From the above planning history search, the two decisions which are of greatest relevance to this planning appeal are 7/383-84 (May 1984) and 7/0757/05/F/WX (October 2005). Application ref. 7/383-84 was implemented and therefore represents the planning permission that is pursuant to the scheme which stands on the appeal site today.
- 2.20 This planning permission, which forms **Appendix III** to this Statement of Case, was subject to 23 planning conditions. It is noted that none of these conditions prevent the sub-division of the unit. Of particular relevance to this planning appeal is Condition 18. This states that the premises:
- "Shall be used for the storage, wholesale and retail of articles for home decoration, maintenance and improvement, garden goods and equipment, self-assembly furniture and for no other purpose including any other purpose in Class I of the schedule to the Town & Country Planning (Use Classes) Order 1972."*
- 2.21 Planning permission reference 7/383-84 was also subject to a Section 52 Agreement (Ref. SA049) dated 31st January 1984 which was made between the Council of the Borough of Broxbourne and Investors in Industry Developments Limited (formerly I.C.F.C. Developments Limited). This legal agreement prevented the Estate being used for *"the purposes of a retail or wholesale food shop or store"*.
- 2.22 On 28th October 2005 planning permission was granted for the variation of Condition 18 of original planning permission reference 7/0383-84. This allowed for the sale of all non-food items from the premises, rather than these being limited solely to home improvement products. This planning permission (Ref. 7/0757/05/F/WX) forms **Appendix IV** to this Statement of Case. It is noted that none of the other conditions imposed on original planning permission ref. 7/0383-84 were replicated on 7/0757/05/F/WX.
- 2.23 The current position in relation to the trading restrictions in place on the retail unit at the appeal site are that it is permitted to stock any non-food items. However, it is not permitted to stock food items. This is enforced by a planning condition and a Section 52 legal agreement (Ref. SA049), which remains in place on the estate. It is noted that none of the other conditions imposed on original planning permission ref. 7/0383-84 were replicated on more recent variation 7/0757/05/F/WX.

Land Ownership and Tenancy

- 2.24 The appeal site is in the sole ownership of Rookman Properties Ltd, who are fully supportive of the planning application proposals. Indeed, a representative of the landowner expressed this view to members of Broxbourne BC's Planning and Regulatory Committee in a letter dated 28th July 2021. Paragraph three of this letter, which forms **Appendix V** to this Statement of Case, states that:
- "We feel this proposal will be a major benefit to Waltham Cross town centre; it brings regeneration to an otherwise tired looking site, it enhances the retail offer, it brings new investment, improves the vitality and will create 50 new jobs in addition to the existing 30 at Homebase"*.
- 2.25 The existing tenancy of the retail unit is also of relevance to this planning appeal. Homebase have occupied the building for well over a decade and have worked jointly with the applicants on plans to resize their floorspace within the building in order that it will better meet their future requirements

and introduce a complimentary retailer which will aid in the site's attraction. They have undertaken this exercise successfully on a number of other sites nationally with Aldi. Homebase are therefore fully supportive of the planning application proposals and expressed this view to members of Broxbourne BC's Planning and Regulatory Committee in a letter dated 28th July 2021. This letter also forms **Appendix V** of this Statement of Case.

2.26 Of particular note to the appeal proceedings is paragraph four of this letter, which explains that:

"Homebase is firmly committed to retaining this store and to serving successfully, as it has done for a number of years, the home improvement and gardening needs of the residents of Waltham Cross. If planning permission was refused, the site would continue to trade as a Homebase. Our store benefits, by law, from a protected tenancy and rights to renew our lease. Homebase will, in the event of a refusal, simply renew and extend the current lease, over the whole site, for a further period of fifteen years. Even though, therefore, the Committee report refers to potential redevelopment options, these protected rights mean that the site is not available for redevelopment".

3. The Proposed Development

Overview and Context of the Proposals

- 3.1 The planning application seeks 'full' permission for the refurbishment, extension and external alterations to an existing 'Use Class E' non-food retail unit currently occupied by Homebase, to enable it to trade as part foodstore (Aldi) and part non-food retail unit (Homebase). Alongside works to the building itself, the scheme involves modifications to an existing external 'garden centre' (outdoor sales area), the current car parking layout, and other associated site works.
- 3.2 The scheme will enable Aldi to make a positive investment within Waltham Cross town centre – a centre in which they have been seeking representation for many years – whilst retaining the home improvement retail offer of Homebase and the existing benefits this brings to the area. The reduced size of Homebase's unit will be more commensurate with their future business requirements and will safeguard the long-term viability of their operation, with the retailer having been through a process of 'right-sizing' its portfolio over the past two years.

Specifics of the Development Proposals

- 3.3 The precise nature of the development proposals is set out below. The planning application seeks 'detailed' planning permission for the following:
- Demolition of the existing projecting customer entrance lobby on the eastern side of the building (73 sq. m of floorspace), alongside demolition of part of the enclosed 'garden centre' which currently projects north from the building;
 - External alterations to the elevations of the existing non-food retail unit (including the creation of two shop fronts on the northern elevation) in order to form two adjoining retail units;
 - The use of part of the existing floorspace (eastern half of the building) as a foodstore to be occupied by Aldi stores Ltd. This unit will have a total Gross Internal Area ('GIA') of 1,756 sq. m, of which 1,262 sq. m will be used as its net sales area. The 'back of house' area will occupy the remaining 494 sq. m of the building;
 - Aldi's introduction will involve the construction of a new loading dock extension (a dock-levelling system) to the building's eastern elevation, extending to 90 sq. m (this will form part of the back-of-house area);
 - The use of part of the remaining floorspace (western half of the building) as a non-food retail unit to be occupied by Homebase. This unit will have a total Gross Internal Area ('GIA') of 2,371 sq. m, of which 1,735 sq. m will be at ground floor level and the remaining 636 sq. m will be at mezzanine level. This non-food unit's net sales area will total 1,514 sq. m (over both the ground and mezzanine floors). Accordingly, there will be a reduction in the Homebase unit's net sales area of over 50% as part of the proposed scheme;
 - The Homebase unit will continue to be served by an enclosed open-air 'garden centre' (outdoor sales area). However, this will be reduced in size compared to the garden centre currently present on site;

- Provision of 157 shared car parking spaces between the two units, including 8 accessible spaces, 8 parent and child spaces, and 4 click and collect spaces;
- Provision of 5 motorcycle parking spaces;
- Of the 157 proposed parking spaces, 4 will also be equipped with Electric Vehicle Charging Points ('EVCP') and below ground infrastructure will be put in place to add up to a further 16 EVCPs in the future;
- 18 short-stay bicycle parking spaces (9 Sheffield cycle hoops) for customers, and long-stay bicycle parking spaces (located within the store's warehouse) for staff; and,
- Soft and hard landscaping works across the site, including new landscaping to improve the aesthetic appearance of the site along its eastern and western boundaries.

Layout, Design, Access Arrangements, Parking and Landscaping

- 3.4 The proposed development is described in detail as part of Section 3 of the Appellant's Supporting Planning Statement (Avison Young, March 2021) which should be read in conjunction with this Statement of Case and alongside the submitted architectural drawing pack. See specifically Paragraphs 3.13 to 3.36.

Business Model of Aldi and Homebase, Servicing and Operational Hours

- 3.5 An overview of the broad business model of Aldi and Homebase is also provided at Section 3 of the Appellant's Supporting Planning Statement (Avison Young, March 2021). The proposed operational hours and servicing arrangements for the scheme are also set out within the same section of the Planning Statement.

4. Request for Inquiry Appeal Procedure

- 4.1 The appeal proposal constitutes 'major development' in accordance with the provisions of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The appeal is for the refurbishment, extension and external alterations to an existing Homebase unit of 4,319 sq. m GIA (including mezzanines) to provide a downsized Homebase store and a new 'Use Class E' foodstore that will be occupied by discount foodstore retailer Aldi Stores Ltd. If allowed, the appeal scheme will retain 30 jobs within the existing Homebase store and provide an additional 40 - 50 jobs at the proposed Aldi foodstore, primarily aimed at local residents.
- 4.2 Given the scale and nature of the proposed development, which has generated local interest and has appeared in the press, along with the disputed nature of the reasons for refusal, particularly with respect to Local Plan Policy WC2: Waltham Cross Northern High Street, it is considered appropriate for the appeal to be progressed under an Inquiry procedure.
- 4.3 The reasons for refusal of the application are complex and technical in nature and have necessitated detailed legal advice following the planning application's determination. As such, formal examination of these matters and the application / interpretation of Local Plan Policy WC2 is required to ensure that a fully informed decision on the appeal can be forthcoming. Furthermore, the applicant strongly disputes the other objections made by the Council in relation to: layout, design, site connectivity, pedestrian and cycle accessibility, parking provision, and noise impact.
- 4.4 All of these matters are complex and inter related and will need to be dealt with through detailed examination of evidence adduced by both parties. As such, it is the view of the Appellant that these matters will require cross examination for each party and the Inspector to fully understand the basis of the Council's objections and how respective witnesses have reached different conclusions.
- 4.5 It is the view of the applicants that Broxbourne Borough Council's evidence should be tested through formal questioning by an advocate. This accords with the approach set out in the Procedural Guide for planning appeals in England (November 2020) at Appendix K, which identifies that common sense judgement should be applied in deciding upon the most appropriate procedure.
- 4.6 Finally, it is considered that having regard to the above, to address all matters six sitting days will be required. This exceeds the time normally set aside for a hearing, reinforcing why a public inquiry would be the most appropriate procedure for determination of the appeal.

5. Planning Policy Context

5.1 This section provides a review of relevant planning policy and guidance at the national and local level in so far as it is material in assessing the merits of the site for the proposed development.

Introduction

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this planning application comprise;

- Broxbourne Local Plan 2018 – 2033, adopted 23rd June 2020

5.3 Accordingly, the *'starting point'* in the determination of planning applications within the Broxbourne area is the Local Plan. Alongside the Local Plan (the development plan), there are other local and national planning policy documents that represent material considerations in the determination of this planning application and these are also summarised (where relevant) in this section. These policy documents include:

- National Planning Policy Framework (July 2021);
- National Planning Practice Guidance;
- Broxbourne Retail & Leisure Study (July 2015) and accompanying Addendum (June 2016); and,
- Waltham Cross Town Centre Strategy (March 2015).

5.4 It is envisaged that both the Local Plan and all policy documents referred to as material planning considerations will form Core Documents to the appeal and are not therefore appended separately to this SoC. A list of the planning policies relevant to the appeal proposal is enclosed in the submitted Statement of Common Ground for agreement with the Council.

Development Plan

Broxbourne Local Plan 2018-2033 (June 2020)

5.5 The policies of relevance to the appeal which are contained within the Broxbourne Local Plan (2018 – 2033) are summarised as follows:

Strategic Policies

5.6 **Policy DS1 (The Development Strategy)** explains that provision will be made for between 5,000 and 6,000 net additional jobs focusing on Brookfield, Park Plaza, Cheshunt Lakeside and the town centres (such as Waltham Cross) as well as provision being made for approximately 24,000 square metres of new retail development. Policy DS1 states that strategic development sites will include *"Waltham Cross High Street North"*.

Place Making

5.7 **Policy PM1 (Sustainable Place Making)** states that new developments proposed within the Borough are required to complement existing town and villages and the countryside around them. Major

developments must also establish their own identities through the implementation of sustainable place making principles.

Waltham Cross Policies

- 5.8 **Policy WC1 (Waltham Cross Town Centre)** states that the Council will support proposals which accord with the following town centre priorities:
- *A vibrant town centre throughout the daytime and the evening;*
 - *Redevelopment of the northern High Street (see below);*
 - *Public realm improvements throughout the High Street and beyond;*
 - *Additional homes in and around the town centre; and*
 - *Conserving and where possible enhancing the historic environment.*
- 5.9 The introductory text to **Policy WC2 (Waltham Cross Northern High Street)** explains (Paragraph 11.4) that the northern end of the High Street presently sees relatively low levels of footfall and has a level of vacancy higher than the southern end. It states that the Town Centre Strategy therefore now promotes the site for a mixed-use, high density development of apartments, shops and community uses.
- 5.10 Paragraph 11.5 states that the estimated capacity of the eastern part of the site is for 150 new homes and that this would entail the relocation of Wickes. The western part of the allocation (the application site) comprises the Homebase store and the paragraph explains that:
- “Negotiations will take place with both the landowner and Homebase to establish the most sustainable future for this site. That may result in the status quo, a redevelopment incorporating a re-modelled Homebase store or the closure of the Homebase store and its potential relocation”.*
- 5.11 Accordingly, Policy WC2 proposes a mixed-use quarter at ‘Waltham Cross Northern High Street’ comprising the following:
- a) *On the land east of Sturlas Way, approximately 150 homes;*
 - b) *On the land west of Sturlas Way, the potential for significant housing development, possibly as part of a mixed use development incorporating the existing store;*
 - c) *40% affordable housing;*
 - d) *Shops/commercial/community ground floor uses.*
- 5.12 The policy also states that:
- The site is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted;
 - Masterplanning is to consider reasonable options for the relocation of the Wickes and Homebase stores;
 - A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan; and,
 - If necessary, compulsory purchase will be pursued by the Council.

Retail

- 5.13 **Policy RTC1 (Retail Hierarchy)** is clear that the Local Planning Authority will permit town centre use development (such as food retail) within the defined centres identified on the proposals map, providing that this is compatible with their function and position within the retail hierarchy. Waltham Cross is classed as being a 'town centre' and heads the local retail hierarchy alongside Hoddesdon Town Centre.
- 5.14 **Policy RTC2** concerns "**Development within Town, District and Local Centres, Neighbourhood Centres and Shopping Parades**". It states that the following criteria will be used to consider the acceptability of new development proposals, including extensions, alterations and changes of use within the Borough's town, district, and local centres:
- a) *whether the development enhances the historic character of the centre (where relevant) and the public realm;*
 - b) *the role of the centre and services it provides;*
 - c) *the vitality and viability of the centre;*
 - d) *the provision of safe access, full and complete servicing arrangements, and parking;*
 - e) *any adverse impacts upon the centre or residents in terms of noise, fumes, smells, litter and general disturbance.*
- 5.15 The policy continues that planning applications for new development, including changes of use, within the above centres should have regard to the relevant Council strategy, including the town centre strategies for Hoddesdon or Waltham Cross.

Design

- 5.16 **Policy DSC1 (General Design Principles)** states that the Council expects a high standard of design for all development and wherever possible, development proposals must, amongst other things: *'enhance local character and distinctiveness, taking into account: existing patterns of development; significant views; urban form; building typology and details; height; roof form; fenestration detail; materials; building lines and other setbacks'*
- 5.17 **Policy DSC2 (Extensions and Alterations to Existing Development)** relates to proposals of this nature and states that extensions and alterations to existing buildings will be required to respect the character and design of the original building.
- 5.18 **Policy DSC3 (Design affecting the Public Realm)** states that development proposals which create, or have a significant impact on, the public realm should, amongst other things, maximise legibility and permeability of the public realm through the layout of buildings, landmarks and landscaping. They should also seek to maintain flexibility of use, uncluttered spaces and easy movement through the space through the use of public art, street furniture and infrastructure including signposting/way finding.
- 5.19 **Policy DSC7 (Comprehensive Urban Regeneration)** states that the Council will pursue the comprehensive development of the strategic development allocations within the Plan and will resist piecemeal development of those areas that do not accord with agreed masterplan. In addition, the policy states that the Council will promote comprehensive regeneration elsewhere where it is

appropriate to do so and will oppose developments that would compromise such regeneration or the implementation of the wider development of an area.

- 5.20 **Policy DSC8 (Shopfronts and Fascias)** requires that new and altered shopfronts must respect the scale, proportion, character and materials of the building and adjoining buildings in the street scene. It continues that shop fronts should also sit within the framework of the existing building structure and façade style.

Transport and Access

- 5.21 **Policy TM1 (Sustainable Transport)** states that the Council will expect all major development proposals to show how ways to reduce car use and promote alternative ways to travel have been considered and incorporated into the development. With regards to pedestrian movement, the policy states: *"Development must not detrimentally impact upon existing footpaths and public rights of way and proposals should, wherever possible, extend, enhance or provide for new pathways, rights of ways and equestrian routes"*.
- 5.22 The policy also requires development proposals to provide for cycle facilities through the use of accessible and safe routes to and around the site, as well as the provision of cycle storage and cycle parking areas. Finally, policy TM1 states that all major developments should contribute to improved public transport, including infrastructure and revenue contributions for enhanced services, and should ensure that internal layouts do not impede the passage of buses.
- 5.23 **Policy TM2 (Transport and New Developments)** states that development will not be permitted where there would be a severe impact on the transport network. Development proposals must ensure that the safety of all movement corridor users is not compromised.
- 5.24 **Policy TM3 (Access and Servicing)** states that new development proposals must provide for adequate, safe and convenient servicing arrangements, access points and drop off areas.
- 5.25 **Policy TM5 (Parking Guidelines)** refers to Broxbourne's car parking guidelines. It states that the Council will seek a sensible balance of car and cycle parking spaces based on the nature of the proposal, site context and wider surrounding area, and accessibility of shops, services and sustainable transport infrastructure, with the overall aim of reducing private car use.

Residential Amenity

- 5.26 **Policy EQ1 (Residential and Environmental Quality)** states that all proposals for development within the urban area must avoid detrimental impacts on the amenities enjoyed by the occupiers of neighbouring properties in terms of daylight, sunlight, outlook and overlooking. It also states that proposals which generate dust, noise and odour must not result in a material harm to the amenity levels currently enjoyed in an area.
- 5.27 **Policy EQ4 (Noise)** states that new development, and extensions or alteration to existing developments, emitting noise levels noticeably above background levels on a consistent or consistently periodic basis, should be sited away from noise sensitive land uses including residential accommodation, schools and health facilities. If this is unavoidable, the Council will consider a range of factors, including the acceptability of measures incorporated into development proposals to mitigate the impact of noise on noise sensitive land uses.

Material Considerations (National)

National Planning Policy Framework (July 2021)

- 5.28 Planning policy at the national level is provided by the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and describes how these are expected to be applied.
- 5.29 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking this means:
- Approving development proposals that accord with an up-to-date development plan without delay, or
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - The application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 5.30 Section 4 of the NPPF (Decision-making) confirms that local planning authorities should approach decisions on proposed development in a positive and creative way by working proactively with applicants to secure developments that will improve the economic conditions of the area.
- 5.31 Section 6 of the NPPF (Building a strong, competitive economy) states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 5.32 Section 7 of the NPPF (Ensuring the vitality of Town Centres) highlights the importance of promoting the vitality and viability of town centres and sets the requirements for the sequential test and retail impact test for planning applications for 'main town centre' uses that occupy edge-of-centre or out-of-centre locations. Section 7 is clear that these policy tests do not apply to 'in-centre' schemes.
- 5.33 Section 8 of the NPPF (Promoting healthy and safe community) reaffirms the importance of creating safe, healthy and inclusive places by ensuring that development encourages walking and cycling as well as active street frontages.
- 5.34 Section 9 of the NPPF (Promoting sustainable transport) states that transport issues should be considered from the earliest stages of the planning process to ensure that potential impacts can be addressed, and so that opportunities for avoiding and mitigating any adverse effects can be included.
- 5.35 Section 11 of the NPPF (Making effective use of land) supports as far as is possible the re-use of previously developed land and vacant buildings for development, such as retail.
- 5.36 Section 12 of the NPPF (Achieving well-designed places) confirms that good design is a key aspect of sustainable development and creates better places in which to live and work.

National Planning Practice Guidance (March 2014)

- 5.37 National Planning Practice Guidance (PPG), which was published in March 2014, supplements the policies set out in the NPPF. The Guidance does not change national planning policy but offers practical guidance as to how such policies should be applied.

Material Considerations (Local)

Waltham Cross Town Centre Strategy (March 2015)

- 5.38 A Town Centre Strategy was prepared for Waltham Cross in 2015 to guide the development and regeneration of the town centre over the medium to long term. The strategy does not form part of the development plan but represents a material consideration in the determination of planning applications. A copy of the Town Centre Strategy is provided at **Appendix VI** of this Statement of Case.
- 5.39 Some of the key objectives outlined for Waltham Cross on Page 12 of the document include:
- Hosting a wide range of shops, supermarkets, entertainment, services, and places to eat and drink, supported by a lively street market and diverse community events;
 - Be the first choice for residents of Waltham Cross and southern Cheshunt;
 - Be a well-regarded retail and leisure destination for residents of south Hertfordshire; and,
 - Remain active and busy throughout the evening as well as the daytime.
- 5.40 Of particular relevance to the planning application site is the Waltham Cross '*Northern High Street Opportunity Zone*' – which is outlined on Page 24 of the report. This comprises the town centre's Homebase and Wickes stores and their associated car parks, as well as adjacent small-scale retail units – all of which are located at the northern end of the defined centre.
- 5.41 The strategy (Page 24) states that the '*exposure of this area could be improved*' by revising existing highway access arrangements to improve the public realm. The Council further considers that doing this could unlock the opportunity for a mixed-use redevelopment of the area north of Park Lane to provide a mix of uses that '*complement and connect more strongly with the town centre*'. It continues that the Council will seek to work with landowners and tenants of the Wickes site, as well as the adjacent Homebase site to its west, to investigate their potential for redevelopment.
- 5.42 Of note is the fact that the diagram of the '*Opportunity Zone Northern High Street*' shown on Page 24 of the Strategy highlights the Homebase store to be a 'potential inclusion' rather than the 'main opportunity site' of the Northern High Street area – which is the Wickes retail unit and the terraced shop units to its south.
- 5.43 Furthermore, Page 30 of the Strategy states that:
- "the Council will engage with Wickes to investigate the potential for a reformatting or redevelopment of the site within this broad opportunity zone and for the creation of new retail frontage to deliver continuity to the town centre. In addition to this site, the Homebase site to the north-west of the core town centre may offer further potential for a broader range of town centre uses through a mixed-use development and stronger linkages to the town centre core" (our emphasis).*

5.44 Our observation on the above quote is that, again, the Homebase site is regarded as a secondary opportunity, with the Wickes site the first priority for redevelopment in order to deliver the *'Northern High Street Opportunity Zone'*.

Broxbourne Retail & Leisure Study (July 2015) and accompanying Addendum (June 2016)

5.45 WYG prepared the Broxbourne Retail & Leisure Study ('BRLS') in July 2015 and a subsequent addendum in 2016. The purpose of the Study is to provide an assessment of retail and leisure needs and capacity in the period to 2030, and to review the current performance of Waltham Cross and Hoddesdon Town Centres, Cheshunt District Centre, and various neighbourhood centres and local centres within the borough. The Study acted as the evidence base to inform the Broxbourne Local Plan (2018 to 2033), as well as providing baseline information to assist in the determination of planning applications for retail and leisure development.

5.46 The Retail Study Addendum of June 2016 provides the latest convenience goods expenditure capacity projects for the authority area, and also identifies the trading performance of all key foodstores. In particular the 2016 addendum finds that:

- By 2025, even allowing for committed development, there is surplus convenience goods expenditure capacity of £70.3m, which is sufficient to accommodate 5,700 sq. m to 7,200 sq. m (net sales) of new convenience goods floorspace;
- Council authored Brookfield Retail & Leisure Impact Study (February 2017) only identifies that broadly half (or 3,000 sq. m) of the borough's convenience goods retail floorspace requirement will be met through this scheme – leaving a residual requirement of at least 2,700 sq. m net over the plan period.

5.47 Finally, Table 5 of Appendix I (Statistical Tables) of the Retail Study Addendum presents the *"survey-derived performance of stores compared to expected benchmark performance"* it shows that:

- Lidl, High Street, Waltham Cross is overtrading by +£8.6m; and,
- Sainsbury's, The Pavilion High Street, Waltham Cross is overtrading by +£4.5m.

5.48 Whilst the Iceland store in Waltham Cross town centre is found to be trading slightly below benchmark levels, the 2016 Retail Study addendum suggests that the centre's food retail offer as a whole is performing at +£10.6m above benchmark levels. This expenditure surplus is broadly sufficient to accommodate the turnover of a new discount foodstore.

5.49 The relevant extract from the Broxbourne Retail & Leisure Study Addendum (June 2016) forms **Appendix VII** of this SoC.

6. Reasons for Refusal

6.1 The Decision Notice, which forms **Appendix I** of this SoC, lists the following reasons for refusal:

- The proposed development would undermine the Council's ability to pursue a comprehensive mixed use development at the allocated site contrary to policies WC2, DS1, PM1, RTC2 and DSC7 of the Broxbourne Local Plan 2018 - 2033 and the Waltham Cross Town Centre Strategy (2015).
- The proposal presents a layout that is not considered to integrate with the town centre and fails to enhance the character and appearance of the wider area. The proposal would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre. The proposal is considered contrary to policies WC2, PM1, DSC1, DSC3, DSC7 and DSC8 of the Broxbourne Local Plan 2018 - 2033 and the Waltham Cross Town Centre Strategy (2015).
- The proposed development would not provide sufficient connectivity improvements for cyclists and pedestrians and improvements to promote the use of public transport. The proposal is therefore contrary to policies TM1, TM2 and TM3 of the Broxbourne Local Plan 2018 - 2033 and the NPPF.
- The proposal does not adequately address the shortfall in car parking spaces at the site and is therefore contrary to policy TM5 of the Broxbourne Local Plan 2018 - 2033.
- Insufficient information has been submitted for the proposed roof plant equipment. Therefore, the noise impact upon the amenity of neighbouring occupants is not fully addressed contrary to policies EQ1 and EQ4 of the Broxbourne Local Plan 2018 - 2033.

6.2 The Appellants consider that the stated reasons for refusal are not justified and that planning permission should be granted. This is discussed in the following section.

7. The Case for the Appellants

- 7.1 The Appellants' case will demonstrate that the stated reasons for refusal are not justified and that planning permission for the proposed development should be granted.

Reason for Refusal 1

- 7.2 The Council's first reason for refusal claims that the proposed development would undermine their ability to pursue a comprehensive mixed-use development at the allocated site. Evidence will be presented to demonstrate that this is not the case, based on the following broad areas.

Scale and Nature of the Works Proposed

- 7.3 Whilst the application proposals would be of significant social and economic benefit to Waltham Cross town centre, the proposed physical changes required to the building would evidently not be so substantial that the proposed development would pre-determine long-term decisions about the delivery and development of the 'Waltham Cross Northern High Street'. This is particularly in view of the fact that the current planning permission governing the building (see **Appendices III and IV**) allows it to stock non-food goods and does not preclude internal sub-division. Accordingly, non-food retail tenants (as an alternative to a discount foodstore) could be introduced solely through internal building works which do not require planning permission. This represents a realistic 'fall-back' position with a more than theoretical prospect of realisation.
- 7.4 Our evidence will also reflect the fact that there have been two planning appeals elsewhere in the Waltham Cross Northern High Street policy allocation area since 2019 for the change of use / conversion of a building where the Council have refused permission based on a perceived impact on the delivery of Waltham Cross Northern High Street. Whilst both appeals were ultimately dismissed on site-specific amenity / design grounds, neither Inspector accepted the Planning Authority's arguments that a change-of-use and minor works would represent 'piecemeal development' that might prejudice future regeneration objectives. These appeal decisions¹ are contained at **Appendix VIII** of this SoC.

Interpretation of Local Plan Policy WC2 in Relation to the Application Site

- 7.5 Detailed evidence will be submitted that neither Policy WC2 of the Local Plan nor the Waltham Cross Town Centre Strategy necessitate the application site's mixed-use redevelopment in order to achieve the overall policy objectives of the Waltham Cross Northern High Street policy allocation:
- Policy WC2 is clear that the site has "potential" for significant housing development, "possibly" as part of a mixed use development incorporating the existing store. Furthermore, supporting policy justification Paragraph 11.5 of the Local Plan is clear that "*negotiations will take place with both the landowner and Homebase to establish the most sustainable future for this site. That may result in the status quo, a redevelopment incorporating a re-modelled Homebase store or the closure of the Homebase store and its potential relocation existing store*" (our emphasis).
 - The 'Opportunity Zone' plan identified at Page 24 of the Council's Town Centre Strategy (2015) identifies the Homebase site for 'potential inclusion', rather than forming part of the 'main

¹ Appeal Ref. PP/W1905/W/18/3213919 (May 2019) and Appeal Ref. APP/W1905/W/19/3243274 (October 2020)

opportunity site' for the Northern High Street further south-east. Page 30 of the document explains that the Homebase site "may offer further potential for a broader range of town centre uses through a mixed-use development" (our emphasis). The Town Centre Strategy forms **Appendix VI** to this SoC.

- 7.6 In exploring this matter further, our evidence will examine why the wording of Policy WC2 and its supporting justification relating to the planning application site was amended as a 'main modification' during the Local Plan hearing process to make it less prescriptive. We provide at **Appendix IX** representations made on behalf of Homebase to the Local Plan process dated 1st October 2018 and the '*Council Responses to Actions Required following Hearing Sessions for Matter 6 (Week Three)*'.
- 7.7 Finally, in view of the fact that Policy WC2 is clear that future development options for the application site will be informed by negotiations with both the landowner and Homebase, our evidence will set out the formal position of these parties for the Inspector. Whilst we consider this to have been made clear in the separate letters of support for the application which were presented to Broxbourne BC's Planning and Regulatory Committee on 28th July 2021 (see **Appendix V**), the Appellant reserves the right to supplement this evidence with the up-to-date position of both parties to aid the Inspector prior to an Inquiry taking place.

Waltham Cross Northern High Street Masterplan and Timescales for Delivery

- 7.8 The first reason for refusal states that the proposed development would undermine the Council's ability to pursue a comprehensive mixed-use development at the allocated site. Whilst the Appellant acknowledges that Policy WC2 refers to the need for the site is to be developed in accordance with a 'comprehensive masterplan', evidence will be submitted that it was not justified for the Council to refuse a deliverable scheme which can be realised over a short timescale on the basis of perceived conflict with a masterplan which did not exist at the time that a decision was taken.
- 7.9 Without a masterplan there is no detail as to what type of comprehensive mixed-use development will be developed and when. This lack of clarity is reflected in the Committee Report which between Paragraphs 8.4 to 8.5 provides no detail nor timescale for progressing the Council's supposed regeneration aspirations for the Site. Whilst a high-level 'Masterplan Option' plan is presented on Page 68 of the Committee Report, there is no context provided to this image in terms of its origin or supporting background evidence.
- 7.10 Notwithstanding the lack of any masterplan for the site, evidence will also be submitted that even if such a plan were to be produced in the coming months, its timescales for delivery would be far longer term than the application proposals. This is emphasised by the Council's own Strategic Housing Land Availability Assessment ('SHLAA') which was published in June 2017, and forms part of the evidence base for the recently adopted Local Plan. The planning application site forms part of SLAA site reference number WX-U-13 and whilst it is identified as an 'achievable' location for future residential development, this is over a period of 11-15 years. Furthermore, the site pro-forma references the fact that this is likely to be a development opportunity that will come forward at the end of the Plan period – which runs to 2033. An extract from the Council's SHLAA forms **Appendix X** of this SoC.
- 7.11 Finally, evidence will be submitted that there is not currently the market demand in Waltham Cross for the type of high-density residential development that the Council has aspirations of delivering on the planning application site. This will further reinforce the case that delivery of the Waltham Cross Northern High Street masterplan is at best long term strategy and there is no justification to resist

development that would result in more immediate positive impacts for the vitality and viability of Waltham Cross town centre.

Economic and Social Benefits of a Discount Foodstore Occupying the Application Site

- 7.12 In reaching their decision the Council has given significant weight to the scheme's perceived conflict with Policy WC2 on the basis of a very rigid residential focussed vision for the future of the application site, despite this not being supported by an adopted masterplan at the time of the application's determination. In our view the Committee Report fails to have appropriate regard to the social and economic benefits that would be associated with the introduction of a discount foodstore on a prime 'in-centre' site within Waltham Cross town centre.
- 7.13 Evidence will therefore be presented which explains how of a discount foodstore of the scale and form proposed on the planning application will result in the enhancement of the '*vitality and viability*' and role and function of Waltham Cross town centre – which is the overarching objective of both the Waltham Cross Town Centre Strategy and the town centre policies of the Local Plan. This evidence will make reference to Broxbourne's retail evidence base and in particular the Retail & Leisure Study (July 2015) and accompanying Addendum (June 2016).
- 7.14 The addendum in particular (extracts from which form **Appendix VII** of this SoC) finds that the two largest existing foodstores in the town centre (Sainsbury's and Lidl) are 'overtrading' considerably when compared to company average levels. This is a strong indicator that there would be substantial quantitative and qualitative benefits in improving the food retail offer in Waltham Cross town centre. It will be proven that the planning application site is the only 'in-centre' site which is capable of accommodating such a foodstore.
- 7.15 It will therefore be demonstrated that the perceived conflict between the appeal proposal and Policy WC2 should be afforded limited weight and, in the overall planning balance, the weight to be afforded to the benefits of delivering a foodstore in one of the Council's preferred locations for retail development (i.e. in one of only two existing defined town centres in the borough), outweighs the perceived conflict with this policy.

Reason for Refusal 2

- 7.16 The second reason for refusal explains that the proposal presents a layout that is not considered to integrate with the town centre and fails to enhance the character and appearance of the wider area. It continues that the proposal would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre.
- 7.17 In response, evidence will be presented to demonstrate that the proposal constitutes a high quality design whilst also making an appropriately efficient use of an existing retail building. The works proposed to modernise and refresh the primary public facing elevations of the building will offer a far more contemporary feel than at present, to the overall benefit of the character and appearance of this part of the town centre. Indeed, Paragraph 8.14 of the Council's committee report acknowledges that the design modifications proposed represent an improvement, albeit they are not consistent with their high-density mixed-use aspirations for the site.
- 7.18 In terms of wider integration with the town centre, it will be demonstrated that by its very nature a foodstore use of this scale within the defined boundary of the town centre (as in this case) supported by a free-of-charge car park and in easy walking distance of other uses, has the potential to foster

linked shopping trips with the wider centre. In forming their reason for refusal the Council have overlooked this beneficial impact that the proposed development would have on the town centre.

- 7.19 Notwithstanding this, the Appellant intends to engage with both the local planning authority and highways authority in advance of the Inquiry in order to explore the precise nature of their concerns insofar as they relate to pedestrian connectivity, whether the submission of any additional studies would assist in the Council's reconsideration of this matter, and how these concerns might be overcome by a scheme of off-site pedestrian enhancements, or a financial contribution towards a future initiative. If an acceptable resolution can be found then it is anticipated that the second part of this reason for refusal can be resolved prior to the Inquiry. Failing this, it will contextualise the concerns so that the magnitude of any residual issues can be assessed.

Reason for Refusal 3

- 7.20 The third reason for refusal states that the proposed development would not provide sufficient connectivity improvements for cyclists and pedestrians and improvements to promote the use of public transport.
- 7.21 In response, it will be demonstrated through evidence that the proposal will result in a well-designed and appropriate retail scheme in a town centre location which, by virtue of its design and features, encourages sustainable travel modes and promotes linkages to other shops and services elsewhere in the town centre and the surrounding residential areas of Waltham Cross.
- 7.22 Notwithstanding this, the Appellant intends to engage with both the local planning authority and highways authority in advance of the Inquiry in order to explore the precise nature of their concerns, whether the submission of any additional studies would assist in the council's reconsideration of this matter, and how these concerns might be overcome by a scheme of off-site mitigation measures relating to cyclist, pedestrians and public transport connectivity, or a financial contribution towards a future initiative. If an acceptable resolution can be found then it is anticipated that this reason for refusal can be resolved prior to the Inquiry. Failing this, it will contextualise the concerns so that the magnitude of any residual issues can be assessed.

Reason for Refusal 4

- 7.23 The fourth reason for refusal states that the proposed development does not adequately address the shortfall in car parking spaces at the application site. In response, the appellant will be preparing evidence to demonstrate that the development will not result in any unacceptable highway impacts by virtue of the modest shortfall in car parking spaces when compared to the Local Plan's parking guidelines. This is in particular given the planning application site's sustainable town centre location and the availability of alternative parking, if required.

Reason for Refusal 5

- 7.24 The fifth reason for refusal states that insufficient information was submitted for the proposed roof plant equipment as part of the application and therefore the noise impact of the scheme upon the amenity of neighbouring occupants was not able to be fully assessed during the planning application.
- 7.25 As noted in the Planning Committee Report, the Environmental Health Officer's response to the planning application on 26th May 2021 states that their request for additional information in connection with the mechanical plant and its impact could be dealt with as part of a planning

condition requiring a further Noise Impact Assessment to be prepared prior to the installation of any externally mounted mechanical plant on the retail unit.

- 7.26 The evidence presented in relation to this reason for refusal will include a revised Noise Impact Assessment which includes the additional details requested of the Appellant at application stage. This will demonstrate that the proposal meets the requirements of the Local Plan in relation to impact on residential amenity by virtue of noise. It is hoped that if the contents of the revised Noise Impact Assessment are acceptable to the Local Planning Authority then this reason for refusal could be resolved prior to the Inquiry. An appropriately worded planning condition could then be used to ensure that any externally mounted mechanical plant is consistent with type and location of that tested within the revised Noise Impact Assessment.

8. Request to Substitute Proposed Site Plan

- 8.1 The appellant would like to request that Proposed Site Plan Ref: 2924-COR-111F (which is shown at **Appendix XI** and submitted separately as part of the appeal documentation) replaces Proposed Site Plan Ref: 2924-COR-111D as part of the determination of this appeal. The substitute plan makes a number of minor on-site enhancements which seek to help overcome concerns raised by the Council in relation to pedestrian and cyclist accessibility / connectivity (see reasons for refusal 2 and 3).
- 8.2 It can be confirmed that all works are minor in nature, would be within the same application red line, and are proposed on land which is within the ownership of the site's freehold owner (Rookman Properties Limited). Notice has already been served on this party (the freehold owner) as part of both the submission of the planning application and this appeal. Given the minor nature of the works it is not anticipated that wider public consultation would be necessary.
- 8.3 For clarity, the minor differences between the revised Proposed Site Plan (Ref. 2924-COR-111F) and that which was refused (drawing ref: 2924-COR-111D) can be summarised as follows:
- Widening of the existing public footpath in the northeast corner of the site to provide 3m wide footpath / cycle route (note: all works would be within the application red line and on land which is within the freehold site owner's ownership).
 - Splaying of corner boundary (north-eastern corner of site) to widened public footpath in order to assist cycle users.
 - Removal of 3 parking spaces to allow the re-orientation of the pedestrian route across the car park to improve pedestrian safety.
 - Provision of additional white lining to demark pedestrian crossing points to improve pedestrian safety.
 - Existing pedestrian access from Sturlas Way to be closed off to encourage pedestrians to use the new widened pedestrian access point which offers a safer route across the retail unit's car park.
 - Addition of covered and secure staff cycle spaces to promote cycle use.
 - Confirmation of the provision of staff shower and locker facilities within the building to encourage the use of bicycles.

9. Conclusion

9.1 This Statement of Case has been prepared and submitted by Avison Young on behalf of Aldi Stores Limited in support of an appeal against the refusal of planning application reference. 07/21/0519/F by Broxbourne Borough Council ("Broxbourne BC") at Homebase, Sturlas Way, Waltham Cross, EN8 7BF. The description of development of the detailed planning application is as follows:

"Refurbishment, extension and external alterations to existing non-food retail unit to enable it to trade as part foodstore and part non-food retail unit, alongside modifications to existing external garden centre, car parking layout, landscaping and other associated site works".

9.2 The planning application to which this appeal relates was submitted to Broxbourne BC on 27th April 2021. It was validated on the same day and was given a target determination date of 27th July 2021. On Thursday 15th July 2021 the applicant's agent received correspondence from Broxbourne BC stating that the planning application was to be determined at the Council's Planning and Regulatory Committee meeting of 28th July 2021. The officer recommendation (as set out in the Committee Report) was one of refusal and members of the Planning and Regulatory Committee followed this officer recommendation at the meeting of 28th July 2021. The Decision Notice was issued by Broxbourne BC on 9th August 2021.

9.3 It is considered that Broxbourne BC's decision to refuse the application was not justified and that the appeal should be allowed for the following reasons:

- The proposed development would not undermine the Council's ability to pursue a comprehensive mixed-use development in line with the Waltham Cross Northern High Street policy allocation and, in any case, would deliver a discount foodstore which will be of equal if not greater value to the overall 'vitality and viability' of Waltham Cross town centre;
- The proposal constitutes a high quality design whilst also making an appropriately efficient use of an existing retail building. It also has the potential to support the Council's aim of improving the connectivity of the northern High Street area via off-site pedestrian enhancements, or a financial contribution towards a future initiative;
- The proposal will result in a well-designed and appropriate retail scheme in a town centre location which, by virtue of its design and features, encourages sustainable travel modes and promotes linkages to other shops and services elsewhere in the town centre. Notwithstanding this, the Appellant will engage with both the local planning authority and highways authority to explore whether their concerns can be overcome by a scheme of off-site mitigation measures relating to cyclist, pedestrians and public transport connectivity;
- The development will not result in any unacceptable highway impacts by virtue of the modest shortfall in car parking spaces when compared to the Local Plan's parking guidelines. This is in particular given the planning application site's sustainable town centre location and the availability of alternative parking, if required.
- It will be demonstrated that the noise impact of proposed roof-top mechanical plant on surrounding residential occupiers will be acceptable in planning terms.

9.4 Therefore, due to the contents of this Appeal Statement and the points detailed above, the appeal should be allowed, and permission granted for the above described development.

Appendix I

Planning Application Decision Notice (Ref.
07/21/0519/F)

TOWN AND COUNTRY PLANNING ACT, 1990

Reference No:07/21/0519/F

C/O Avison Young
Norfolk House
7 Norfolk Street
Manchester
M2 1DW

Description of Development: Refurbishment, extension and external alterations to existing non-food retail unit to enable it to trade as part foodstore and part non-food retail unit, alongside modifications to existing external garden centre, car parking layout, landscaping and other associated site works.

Location of Development: Homebase Ltd Sturlas Way Waltham Cross Hertfordshire EN8 7BF

In pursuance of its powers under the above-mentioned Acts and the Orders and Regulations for the time being in force thereunder, the Council **HEREBY REFUSES** the development shown on drawing numbers proposed by you in your application dated 27/04/2021 and received with sufficient particulars on 27/04/2021.

The Council's resolution to come to this decision was based on an assessment of compliance with relevant policies in the development plan, taking into account all material considerations, The reasons for the Council's decision to **REFUSE** permission for the development are:-

1 The proposed development would undermine the Council's ability to pursue a comprehensive mixed use development at the allocated site contrary to policies WC2, DS1, PM1, RTC2 and DSC7 of the Broxbourne Local Plan 2018 - 2033 and the Waltham Cross Town Centre Strategy (2015).

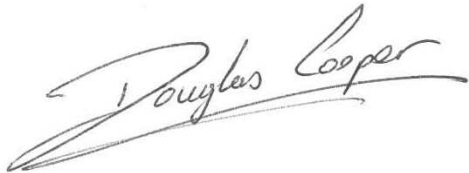
2 The proposal presents a layout that is not considered to integrate with the town centre and fails to enhance the character and appearance of the wider area. The proposal would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre. The proposal is considered contrary to policies WC2, PM1, DSC1, DSC3, DSC7 and DSC8 of the Broxbourne Local Plan 2018 - 2033 and the Waltham Cross Town Centre Strategy (2015).

3 The proposed development would not provide sufficient connectivity improvements for cyclists and pedestrians and improvements to promote the use of public transport. The proposal is therefore contrary to policies TM1, TM2 and TM3 of the Broxbourne Local Plan 2018 - 2033 and the NPPF.

4 The proposal does not adequately address the shortfall in car parking spaces at the site and is therefore contrary to policy TM5 of the Broxbourne Local Plan 2018 - 2033.

5 Insufficient information has been submitted for the proposed roof plant equipment. Therefore, the noise impact upon the amenity of neighbouring occupants is not fully addressed contrary to policies EQ1 and EQ4 of the Broxbourne Local Plan 2018 - 2033.

The Local Planning Authority has been positive and proactive in considering this planning application. Whilst the applicant and the Local Planning Authority engaged in pre-application discussions, the proposed development fails to comply with the requirements of the Development Plan and does not maintain/improve the economic, social and environmental conditions of the Borough.



Signed:.....

Dated: 09/08/21

Head of Planning and Development
DC1001MW

TOWN AND COUNTRY PLANNING ACT 1990

Appeals to the Secretary of State

- If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under Section 78 of the Town and Country Act 1990.
- If you want to appeal against your local planning authority's decision then you must do so within six months of the date of this notice for a full permission or 12 weeks for a householder.
- Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>.
If you are unable to access the online appeal form, please contact the Planning Inspectorate to obtain a paper copy of the appeal form on tel: 0303 444 5000.
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions it imposed, having regard to the statutory requirements, to the provisions of the development order and to any directions given under the order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based its decision on a direction given by him.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

Purchase Notices

- If either the Local Planning Authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor can he render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council of the District or London Borough in which the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Act 1990.

Compensation

- In certain circumstances compensation may be claimed from the Local Planning Authority if permission is refused or granted subject to conditions by the Secretary of State on appeal or on reference of the application to him.
- These circumstances are set out in Sections 114 and related provisions of the Town and Country Act 1990.

Appendix II

Planning Committee Report (Application Ref.
07/21/0519/F)

Item 3: 07/21/0519/F

Location: Homebase Ltd, Sturlas Way, Waltham Cross

Description: Refurbishment, extension and external alterations to existing non-food retail unit to enable it to trade as part foodstore and part non-food retail unit, alongside modifications to existing external garden centre, car parking layout, landscaping and other associated site works.

Applicant: C/O Avison Young

Agent: Avison Young

Date Received: 27.04.2021 **Date of Committee:** 28.07.2021

Officer Contact: Marie Laidler **Expiry Date:** 27.07.2021

Ward Councillors: Cllr Bowman, Cllr Waters and Cllr Norgrove

RECOMMENDED that planning permission be refused for the reasons set out at the end of this report
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1.0 CONSULTATIONS

- 1.1 County Highway Authority
- Objection for the following reasons:
1) The scheme doesn't provide sufficient pedestrian and cycling connectivity;
2) Impact on traffic in the area;
3) The submitted Travel Plan has failed on several items
4) Insufficient information submitted – no walking/cycling survey; no profile of servicing and delivery trips; no road safety audit; access amendment details are missing; footway visibility splays are missing; no accident analysis; no traffic modelling surveys; insufficient electric vehicle charging points; insufficient cycle parking; substandard vehicle tracking; and substandard pedestrian routing across the site.
- 1.2 County Lead Local Flood Authority
- Objection – there are no details of the existing drainage on-site and clarification of the car park proposal required. There is no justification for the selected SuDS.
- 1.3 BoB Environmental Health
Commented that without the make, model and location of the chosen externally mounted mechanical plant it is not possible to assess the impact of the development upon noise sensitive receptors (i.e. residential properties nearby).

2.0 PUBLICITY

2.1 The application was advertised by means of a site notice displayed on 14 May 2021 and 107 individual neighbouring letters were sent to nearby properties on:

- Leven Drive
- Leven Close
- High Street
- Cedar Avenue
- Ruthven Avenue
- Sawyers Court, Sturlas Way

3.0 REPRESENTATIONS

3.1 One letter of support was received and two objections from neighbouring residents were received, with the following concerns:

- Disruption due to construction noise and traffic;
- Additional traffic in the area;
- Additional traffic bringing further air pollution to the area;
- Overspill car parking issues in neighbouring streets that are already heavily parked up;
- Increased risk of vermin due to the food store proposed;
- Increase in criminal activity;
- Security concerns regarding boundary fence with the site at 15 – 37 Ruthven Avenue;
- Another food store is not required in the area.

4.0 RELEVANT LOCAL PLAN POLICIES

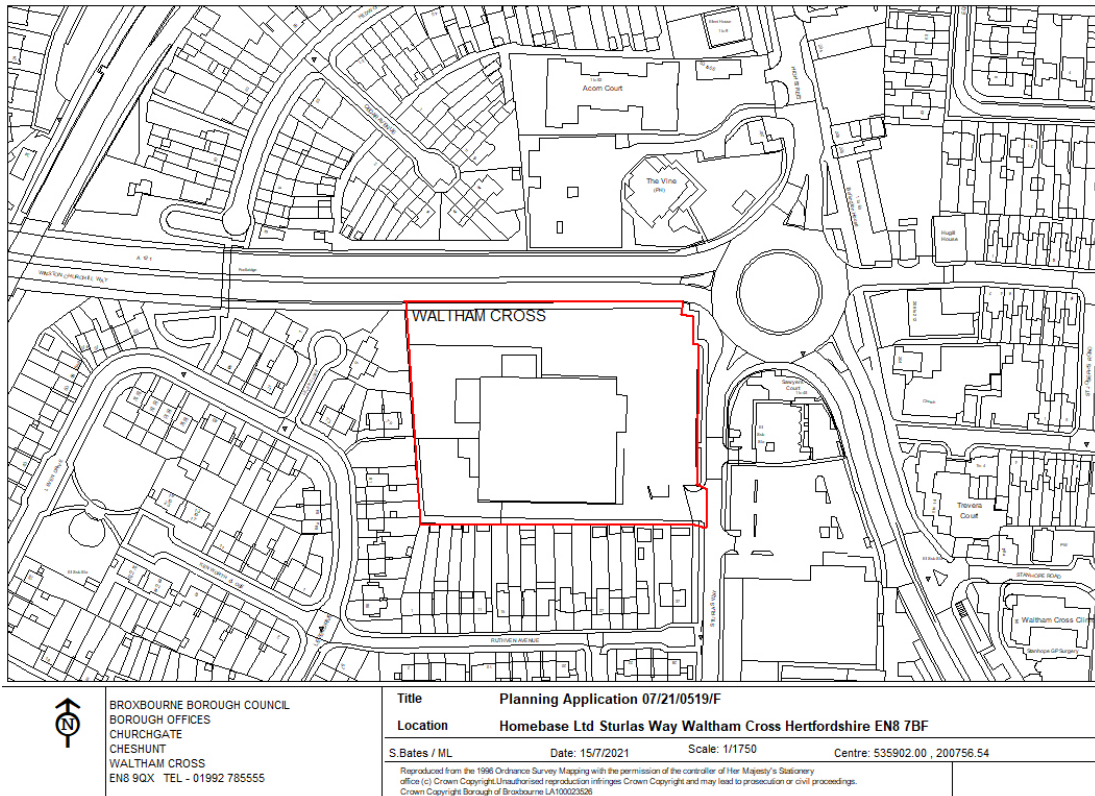
4.1	DS1	The Development Strategy
	PM1	Sustainable Place Making
	WC1	Waltham Cross Town Centre
	WC2	Waltham Cross Northern High Street
	DSC1	General Design Principles
	DSC2	Extensions and Alterations to existing developments
	DSC3	Design Affecting the public realm
	DSC4	Management and Maintenance
	DSC7	Comprehensive Urban Regeneration
	DSC8	Shop Fronts and Fascias
	RTC1	Retail Hierarchy
	RTC2	Development within town, district and local centres and neighbourhood centres and shopping parades
	EQ1	Residential and Environmental Quality
	EQ2	Air Quality
	EQ4	Noise
	EQ5	Contaminated Land
	NEB1	General Strategy for Biodiversity
	NEB3	Green Infrastructure

NEB4	Landscaping and Biodiversity in New Developments
W4	SuDS
W5	Flood Risk
TM1	Sustainable Transport
TM2	Transport and New Development
TM3	Access and Servicing
TM4	Electric Vehicle Charging Points
TM5	Parking Guidelines

- 4.2 The Borough-Wide Supplementary Planning Guidance (SPG) (August 2004) (updated in 2013) is relevant in this case as it provides design guidance for all forms of development.
- 4.3 The Waltham Cross Town Centre Strategy (March 2015) was produced to help guide the development and regeneration of the town centre over a period of five to ten years. It is therefore directly relevant to this application.
- 4.4 The National Planning Policy Framework (NPPF) 2019 also needs to be considered as it sets out the Government's planning policies for England and how these are expected to be applied. The local planning policies listed above are generally considered to accord with the policies and principles of the NPPF. The National Planning Policy Guidance is also relevant.

5.0 LOCATION AND DESCRIPTION OF SITE

- 5.1 The application site is located at the northern limit of the Waltham Cross Town Centre designation area on the western side of Sturlas Way. The site is immediately west of and adjacent to the large busy roundabout at the junction of the High Street and Winston Churchill, Sturlas and Monarchs Ways. It is bounded by Winston Churchill Way to the north and set at a lower ground level. To the east exists Sawyers Court on Sturlas Way which is a three storey residential apartment block containing office uses at ground floor level. The 'Wickes' DIY store is located further to the south east beyond which commences the High Street with its pedestrianised area. To the south and west are terraced and semi-detached houses on Ruthven Avenue, Leven Drive and Leven Close with gardens backing onto the site boundaries that contain mature trees (largely conifer trees) and hedging. A strip of soft landscaping exists along the eastern boundary adjacent to Sturlas Way footpath.



- 5.2 The application site covers approximately 1.23 hectares in area measuring 130m in width and 98m in depth occupying the north western corner of the town centre. It comprises of a large format, established, non-food retail premise, part of the national chain of Homebase DIY/ Garden Supply outlets. Car parking spaces wrap around the eastern and northern areas of the site and servicing is located along the southern boundary. The site is accessed via a crossover onto Sturlas Way approximately 75m south of the roundabout.
- 5.3 The building is single storey with a partial mezzanine level within. The Gross Internal Area covers 4,319sqm, including the mezzanine. The building is of a steel frame construction with a mixture of external finishes, including brown/red brick and high level profiled cladding. A glazed entrance area exists to the eastern elevation. A glazed roof structure also exists to the northern and western garden display areas of the store that are partially open air.
- 5.4 The site is located within Flood Zone 1 with a low probability of flooding.



North east corner of existing Homebase store



North elevation (Garden centre structures proposed to be demolished)



North west corner of the site and northern boundary wall



Entrance, east elevation and southern service area



Conifer trees to the southern boundary



Sawyers Court, existing car park and Alder tree (proposed to be removed)



Eastern boundary treatment



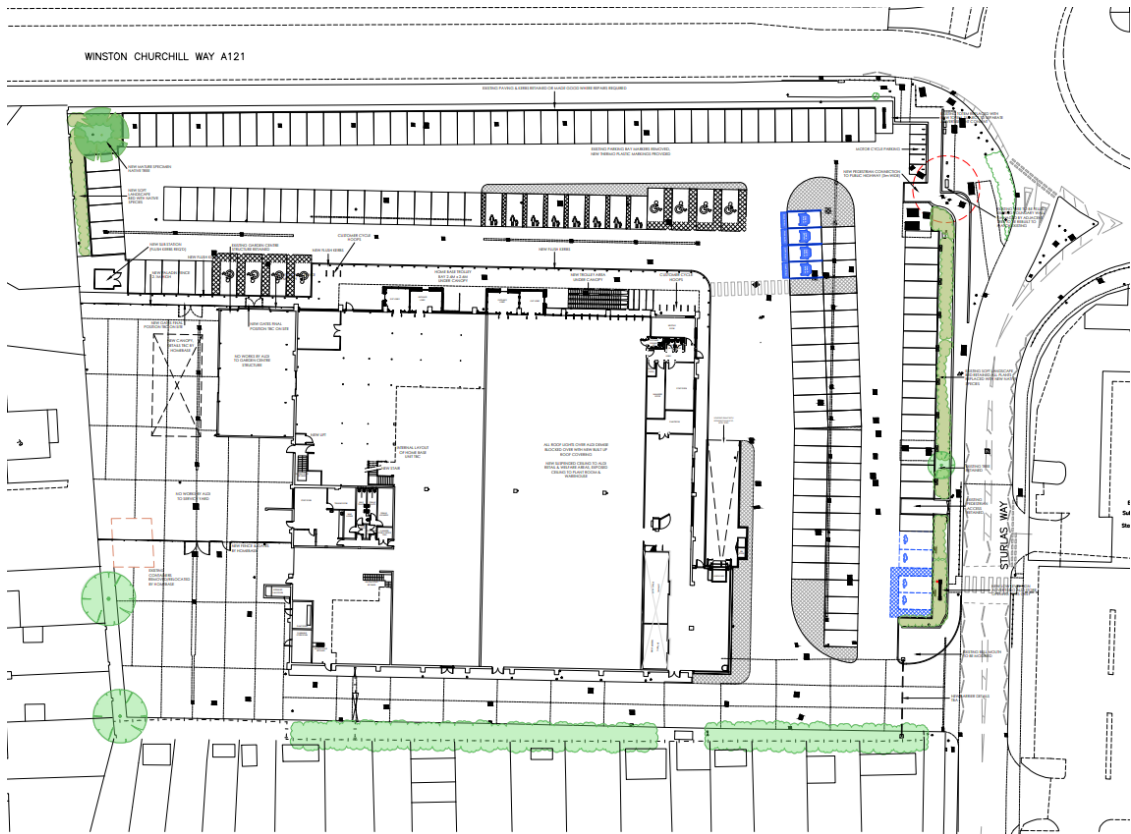
Northern boundary wall and Winston Churchill Way



View towards the site from Winston Churchill Way/High Street/Monarch's Way/Sturlas Way roundabout

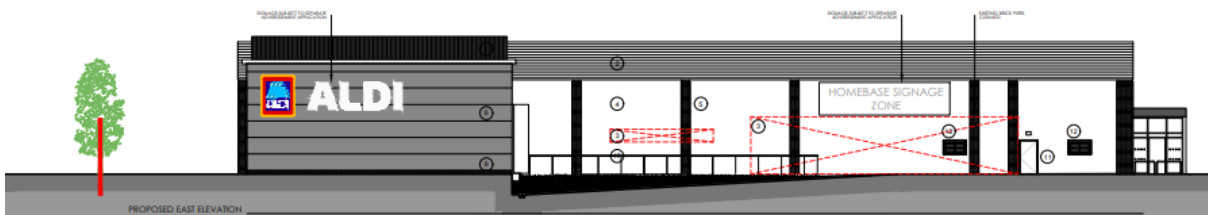
6.0 PROPOSAL

- 6.1 The application proposes the refurbishment and extension of the existing non-food retail unit, Homebase Store, and its sub-division to incorporate an Aldi foodstore. The split would maintain 2,371sqm (currently 4,319sqm) of Gross Internal Area (GIA) for Homebase and 1,756sqm of GIA for Aldi, these include trade areas, staff welfare areas, lobbies and warehouse space. A mezzanine floor would remain within the Homebase store. Homebase would occupy the western side of the store with a trade area of 1,514sqm over the two floors and Aldi would be to the east with a trade area of 1,262sqm.



Proposed site plan

6.2 The alterations to the building would involve the demolition of the northern garden centre enclosure that is a lower height than the main building and contains a partial glazed roof. The remainder of the enclosed outdoor sales area to the west of the building would be retained. Also to be removed is the existing glazed entrance lobby to the east elevation. The entrance to the building would be re-orientated to the north elevation and would incorporate separate entrances and shop fronts for each store. The eastern elevation would be revised with the construction of a ramped service access to the Aldi store with associated loading bay area.



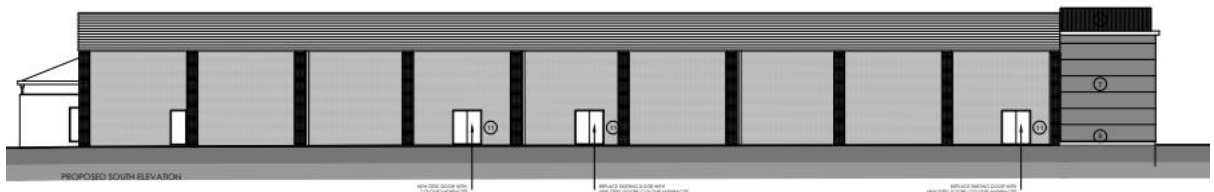
Proposed east elevation



Proposed north elevation



Proposed west elevation



Proposed south elevation

- 6.3 The car park layout is proposed to be amended. The parking spaces along the eastern elevation would be removed to enable the new ramp. The area where the existing garden centre structure is located to the north would be replaced with the lobby areas, trolley parking, cycle parking and some car parking spaces repositioned. A total of 157 car parking spaces would be shared between the two stores, the spaces would be revised and have some allocated bays for disabled parking, parent and child, click and collect and bays with active or passive electric vehicle charging points. Five motor cycle parking spaces would also be provided.
- 6.4 A small area of soft landscaping would be provided within the north west corner of the site. New landscaping would also be provided along the eastern boundary.
- 6.5 The proposal would involve amendments to the façade of the building to modernise its appearance.
- 6.6 The application is supported by a Design and Access Statement; Planning Statement; Phase 1 Land Contamination Report; Ecological Assessment; Flood Risk Assessment; Noise Impact Assessment; Arboricultural Impact Assessment; Transport Assessment and Travel Plan.

7.0 RELEVANT PLANNING HISTORY

- 7.1 7/0757/05/F/WX - Variation of condition 18 of planning permission (ref. 7/0383/1984) to allow the sale of all non-food items (A1). Approved October 2005. Condition 18 restricted use of the premise to only storage, wholesale and retail of articles for home decoration, maintenance and improvement, garden goods and equipment, and self-assembly furniture.
- 7.2 7/0717/02/F/WX - Rear conservatory and replacement side canopy. Approved September 2002.

- 7.3 7/411/2001 - Side extension to garden centre with additional doors. Approved September 2001.
- 7.4 7/464/1997 - External storage in service yard in contravention of condition 11 of planning permission 7/383-84 as shown on drawing number TPC1. Approved September 1997.
- 7.5 7/148/1995 - Demolition of garden centre wall construction of new wall and resurfacing of car park (Post Facto). Approved April 1995.
- 7.6 7/383/1984 - Retail Store, Garden Centre & Car Parking. Approved May 1984. The permission was also subject to a Section 52 Agreement (dated 31 January 1984) preventing the site from being used for the '*purpose of a retail or wholesale food shop or store*'.
- 7.7 7/632/1982 - Replacement of Existing Buildings by Erection of 5,639.4 sqm (60,701sq ft) buildings for class 1 retail use - excluding sale of food/car parking & temporary garden centre. Approved February 1984.

8.0 APPRAISAL

8.1 The main issues for consideration in this case are as follows:

- Principle of development;
- Design, layout and appearance;
- Highways/Car Parking;
- Impact upon residential amenity;
- Surface Water Drainage;
- Trees and Landscaping;
- Biodiversity and Ecology

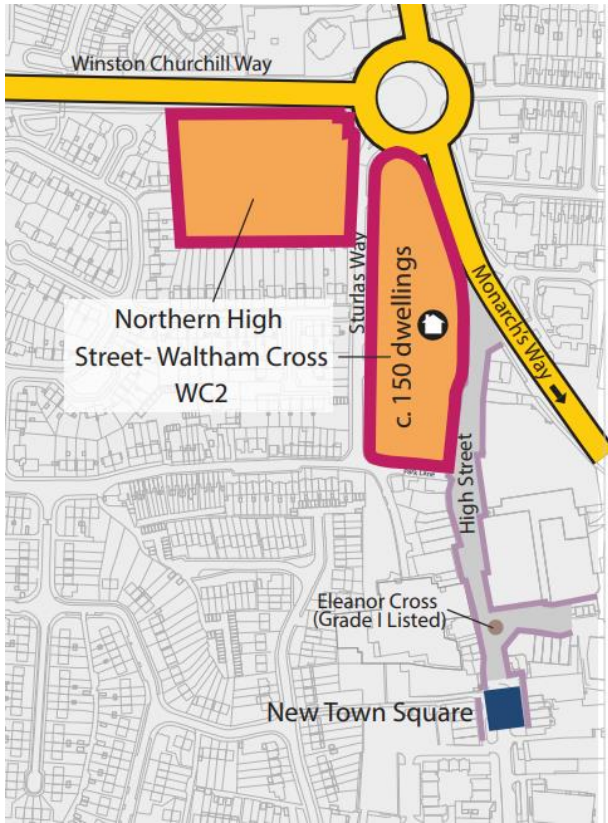
These matters will be appraised in turn, below.

Principle of Development

- 8.2 The application site lies wholly within Waltham Cross town centre. The proposal to subdivide the existing store in order to retain a smaller Homebase store and provide a new food retail store (Aldi) in this location accords with the NPPF as being a suitable use that does not require application of the sequential test (paragraph 86 of the NPPF). It also falls within the retail hierarchy of a town centre use as set out in Policy RTC1.
- 8.3 The submission provides commentary on the Aldi retail offer explaining that Aldi product lines are deliberately restricted to 2,000 rather than around 20,000 lines

that would be found in larger superstores. The products replicate the most regularly purchased items within a weekly shop, the majority of stock is Aldi branded and through economies of scale are heavily discounted. The store does not contain certain ancillary lines (such as tobacco) and there are no staffed butchery, deli's, fishmongers. The stores do not contain restaurants or in-store franchises, such as a Post Office, pharmacy, opticians etc. The proposal indicates that the Aldi store will drive footfall, promote linked shopping trips, stimulate spin-off trade for existing businesses and enable competition within the retail offer in the area, thereby enhancing the centres overall 'vitality and viability'. It concludes that these are factors that ensure that there is far less potential for cross-over with independent high-street retailers than for 'mainstream' food retailers that stock a far wider spectrum of goods. However, that justification is not sufficient in considering the Council's vision for this site with regards to the regeneration of the town centre.

- 8.4 The NPPF sets out in Section 7 (Ensuring the Vitality of Town Centres) that decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation. It recognises that residential development often plays an important role in ensuring the vitality of centres and that residential use should be encouraged. Local Plan Policy WC2 has been formulated following the Waltham Cross Town Centre Strategy in 2015 and sets out the future aspirations for the application site as being part of the Northern High Street redevelopment opportunity. That opportunity would promote a mixed use, high density development of apartments, shops and community uses that would complement and connect more strongly to the town centre. The northern end of the High Street includes both the existing Wickes and Homebase sites either side of Sturlas Way and the current mixed use site at Sawyers Court. The eastern side of the allocation would accommodate approximately 150 dwellings, whilst to the west within the application site, the potential for significant housing and mixed use development is envisaged.
- 8.5 The northern end of the High Street currently sees low levels of footfall. Whilst the two existing home improvement stores at Wickes and Homebase provide an alternative retail range and complement the retail offer within the town centre, the sites 'turn their back' on this end of the High Street to the effect that they close off the pedestrianised core and limit the footfall and viability of the retail units. A proposal such as that being considered here would not improve these wider issues within this sector of the town centre that is required to form part of a more comprehensive master plan to improve the vitality of this area of the town, improve the public realm and help to create a balanced town centre from the northern to southern gateways. The plan below gives an indication of how this sector of the town centre could be developed.



Waltham Cross Northern High Street Indicative Concept Plan



Homebase site
131 homes

Northern High Street Masterplan Option

- 8.6 As will be considered further within the following section of this report, the revised layout to the store, with entrances to the north of the building, is not considered to fit the aspirations sought within policy WC2 as the buildings main façade would continue to face away from the public realm of the town centre. Furthermore, the proposal would not improve pedestrian connectivity and the opportunity for making more efficient use of this extensive piece of land within the town centre would be impeded. Whilst the applicant indicates the benefits of introducing an Aldi store to the area, as set out in paragraph 8.3 of this report, these are short term measures of potential improvements. The Council's vision for a mixed-use development within the site provides significant opportunity to improve this corner of the town centre as a gateway development. Officers have been provided with proposals for this site within a pre-application meeting in 2019 which presented a scheme that would align more closely with policy. That scheme provided a multi-storey mixed-use development of residential use along with two commercial units fronting Sturlas Way. The proposal also contained improvements to the Winston Churchill Way frontage and more substantial soft landscape enhancements throughout the site. The scheme had potential for being brought forward sooner as a positive scheme benefitting the appearance of the northern gateway to the High Street and integrating it effectively with the wider town centre. The proposal being considered here would have a short term role without any of the benefits sought within policy WC2.
- 8.7 The submission indicates that the subdivision of the existing Homebase store reducing its size would be more commensurate with that company's future business requirements and safeguard the viability of its operation. Introducing Aldi within the site would ensure that there would be no risk of a vacant site in the near future. It also sets out that this scheme could be brought forward far sooner than the comprehensive plans set out in Policy WC2, stating that the town centre residential-led redevelopment is intrinsically linked to Crossrail 2 and that the realisation of this would not now be within the plan period as a consequence of the coronavirus pandemic and that Transport for London have put the project on hold. The Council acknowledges that the wide scale redevelopment would be more medium term, however the link to Crossrail 2 is primarily connected with the regeneration of the eastern end of Waltham Cross and lands within the vicinity of the railway station that do not have land allocations for redevelopment. The area is to be pursued through an Area Action Plan (Policy WC4 – Waltham Cross Renaissance Area Action Plan). Whilst the application site is within the Area Action Plan it does have its own Local Plan land allocation for redevelopment. As policy WC2 states '*Incremental development of the area will be resisted*' to ensure that such schemes do not form a barrier to the future aspirations within this current Local Plan.
- 8.8 The submission sets out that the proposal would provide further job opportunities along with the retention of the existing workforce at Homebase. This matter is not sufficient to outweigh the above concerns where there are greater benefits from a mixed use redevelopment of the site.

- 8.9 **The principle of the development within the site is considered contrary to Local Plan Policies WC2, DS1, PM1, RTC2 and DSC7 and the Waltham Cross Town Centre Strategy (2015) which seek a comprehensive development approach to this allocated site.**

Design, Layout and Appearance

- 8.10 The proposal would result in a reduction in the Homebase unit's sales area of over 50%. The scheme sets out that this will allow Homebase to utilise their floorspace more efficiently, better addressing the changing retail needs of customers within the Waltham Cross area. The store will still continue to sell a range of home improvement and garden products but at a reduced scale. The Aldi store, that would accommodate a trade area of 1,262sqm, is set out to be consistent with trading floorspace of every Aldi store (Around 1,200sqm to 1,400sqm). This enables the limited range of identical products sold in each Aldi store to be arranged and displayed with a consistent specification. The scale of the units would therefore meet the needs of each store and is considered an efficient use of the site in that regard.
- 8.11 In terms of the layout, the building would remain in its current position within the site. The existing customer entrance is located to the eastern elevation. The proposal would remove that arrangement so that two entrances for the stores would be located to the north elevation with glazed extensions projecting 3m to the north with a width of 8.6m and height of 4m. A new extension would be located to the east elevation measuring approximately 16m in length, 6.1m in width and a height of 7m with an acoustic barrier extending a further 1.4m in height. A ramp measuring 19m in length with a width of 5m would be excavated sloping down towards the extension that would provide the service area and loading bay requirements for the Aldi store. The supporting text to Local Plan Policy WC2 sets out that this northern end of the High Street 'turns it back' on the street and creates closure to the pedestrian core, consequently limiting footfall. This proposal is not considered to improve that issue, quite the contrary. It would rather create further isolation from the active site frontage, given that the entrances would face away from the pedestrian route to the site from Sturlas Way.
- 8.12 Being presented with the service area of the store to the east with its associated ramp and loading bay exposed to the wider area is also considered to be an inappropriate arrangement as it would not be an attractive public fronted elevation. The submission states that the service area for Aldi is located to the south east of the store to '*ensure it does not detract from any key views from Winston Churchill Way*' and the customer service entrances would '*provide a strong presence and frontage to Winston Churchill Way*'. The submission continues by stating that the arrangement is particularly important given the site's gateway location into the town centre from the north taking note of the sites active frontage. However, Winston Churchill Way is screened by a high boundary wall, as seen in the report photos, therefore the north elevation is not directly visible on approach to the town centre. The sites main elevation that has a more pronounced public view and active frontage is the north eastern corner and the east elevation from Sturlas Way. This elevation is given little

recognition other than to improve the landscaping along Sturlas Way. The proposal would therefore be detrimental to the character and appearance of the wider area and would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre.

- 8.13 Furthermore, the application site is entered from the south east corner via the only vehicular access, a customer entering the site would not directly view the main entrance to the building and therefore maximising the legibility of the building has not been achieved. The proposed entrances would face Winston Churchill Way. With the ground level changes to the north presented on site, the entrances would not be obvious to customers and therefore do not provide a coherent and logical layout. This matter has the potential to affect the footfall recognised within the Local Plan as a major issue of this town centre location. As a result, there would be greater reliance on travelling to the site by car.
- 8.14 The proposal would provide façade alterations to the building to integrate the extension to the east elevation and infill the façade where the section of the building to the north would be demolished. The overall height of the building would remain as existing. The alterations would include repainting of the existing high level cladding in anthracite grey, provision of acoustic screening on the roof, new and existing infill blockwork to be finished in white render, the eastern extension to be finished in flat composite cladding panels finished in metallic silver, anthracite grey cladding and black lower level brickwork, existing brick piers would be retained and cleaned, new glazed shopfronts, windows entrance doors, fascias and rainwater goods would be finished in anthracite grey powder coated aluminium. These façade amendments are considered appropriate improvements that would modernise the appearance of the existing building. However, these are not as beneficial as a high density, mixed use redevelopment sought within the local plan policy allocation that would enhance this gateway site and promote the town centre.
- 8.15 The layout of the car parking has been amended. The vehicular access remains in its current position to the south west corner of the site and car parking occupies the northern and eastern parts of the site as existing. There would be a reduction in the car parking capacity due to the position of the proposed new extension for the Aldi service area to the east and rearrangement to the north where part of the garden sales area is to be removed and replaced with new entrances, trolley and cycle spaces. The matter of parking is considered in the following section. The vehicular routing around the site appears logical and there is sufficient space to manoeuvre in and out of the car parking spaces. However, the position of the proposed new service area would present some conflict between delivery lorries and customer vehicles entering and leaving the site. Whilst this would depend on the delivery times and whether these coincide with store opening times, this matter adds to the concerns raised above with regards to the location of this service area in a prominent position and directly adjacent to customer activity rather than in a more inconspicuous location as existing to the rear of the building.
- 8.16 Overall, the proposal does not seek to achieve the objectives set out within the Local Plan, in particular the implementation of sustainable place making

principles (Policy PM1) whereby new developments are required to complement existing towns, implement their own identities through design benefits, allow interconnection with land uses and interaction between communities.

- 8.17 **The proposal presents a layout that is not considered to integrate with the town centre and fails to enhance the character and appearance of the wider area and would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre. The proposal is considered contrary to Local Plan Policies WC2, PM1, DSC1, DSC3, DSC7 and DSC8 and the Waltham Cross Town Centre Strategy (2015).**

Highways and Car Parking

- 8.18 The application proposes to use the existing access in the south east corner of the site. The existing access has an excessive bell mouth arrangement and lack of tactile paving to each side. The Highway Authority state that the access would no longer be supported by the NPPF and the County Local Transport Plan as it would not promote pedestrian access over that by a private motor vehicle. The access would therefore need to be upgraded to modern highway standards and designed with pedestrian priority in mind. The access road and access junction would therefore need to be narrowed (the exact width tested by tracking of the largest vehicle likely to enter the site) and the access raised to aid pedestrian crossing. The submission indicates that the access would be reduced in width, however no further details are provided and no indication that the access would be raised or provided with tactile paving. The submitted tracking diagrams do not correspond with the reduction in width of the access. The required vehicle visibility splays are demonstrated to be met, however the pedestrian visibility splays of 2m x 2m are missing.
- 8.19 In terms of the assessment of traffic that would be generated by this proposal, the Highway Authority has commented that the proposal is not supported by a robust methodology. The TRICS data (an industry standard collection of traffic surveys) is not supported by real traffic surveys or counts. Furthermore, the selected peak times are not reflective of the local highway network through collection of data from the County. The proposal therefore does not present an adequate assessment of the traffic generation at the site.
- 8.20 The County Highway Authority has rejected the submitted Travel Plan due to a number of missing requirements. However, it is considered that in the event of approval these could be sought through an appropriate planning condition.
- 8.21 The submission indicates that there would be a pedestrian link from the store entrances across the car park to Sturlas Way which then has its own links to the town centre. However, this is not reflected in the plans. A pedestrian link only partially crosses the site and it is not clearly marked out. The Highway Authority also state that a walking and cycling survey should have been provided that would set out recommendations to improve the safety of pedestrians and cyclists between the site and the town centre and Winston

Churchill Way roundabout. The current crossing facilities for pedestrians on Sturlas Way do not contain tactiles and upgrading of the pedestrian access to Sturlas Way is required. Improvements would also be required to nearby bus stops. The NPPF (paragraph 110) requires new developments to be designed so that they are safe for pedestrians and not favour motor traffic, it also seeks to minimise the scope for conflicts between pedestrians, cyclists and vehicles. The proposed location of the Aldi service area at the eastern elevation is not shown to have safe routes around it for pedestrians which should be provided for each direction customers will walk to the site.

- 8.22 As indicated in the previous section of this report, the new service area would in addition present potential obstruction with customers travelling to the site by car at the point of manoeuvring in and out of the nearest car parking spaces to the loading bay. The proposal sets out that on average four HGV deliveries would take place per day and required every day to provide fresh produce. The proposed delivery times overlap with the store opening times and could cause congestion within the site. The Homebase store will continue its use of the service area to the south and south west of the store. Its service frequency and duration will continue as existing.
- 8.23 The proposal would provide 157 car parking spaces in total for both uses (including 8x disabled customer spaces, 8x parent and child spaces, 4x click and collect spaces and 4x spaces with EV charging points (with below ground infrastructure for a further 16 spaces). The number of spaces are indicated to be adequate for the commercial operation requirements for Homebase and Aldi based on their store portfolios. The existing store currently has 192 spaces; under the Council's current parking guidelines this is an excessive amount for the existing arrangement. However, the guidelines indicate that a foodstore would have a higher parking requirement than the existing non-foodstore with garden centre. The Aldi food store would therefore require 98 car parking spaces and Homebase would require 95 spaces as per the Parking Guidelines (a total requirement of 193). A shortfall of 36 spaces is presented. The site is located in an accessible location within the town centre and cycle parking is provided (as set out below). However, whilst the number of car parking spaces is suggested within the submission to suit both stores, the issue of insufficient pedestrian accessibility improvements to and within the site places significant doubt over the acceptability of this shortfall. Without the pedestrian links there is potential for increased vehicular travel to the site resulting in greater demand for parking. Therefore, the shortfall in car parking spaces is not sufficiently justified.
- 8.24 A time limit of 90 minutes is proposed to be placed upon customers using the car park to enable linked trips with the town centre to take place whilst preventing any longer term parking exploitation.
- 8.25 Policy TM4 requires that at least 20% of all new parking spaces for new retail and commercial development must be fitted with active electric vehicle charging points, with passive provision for all the remaining spaces. The proposal sets out that there would be 4 active charging points provided and a further 16 car parking spaces would be provided with below ground infrastructure for passive

charging points. Taking into account that there would be a reduction in parking spaces rather than new parking spaces, the amount of charging points proposed is justified.

- 8.26 The Transport Assessment indicates that the cycle parking would incorporate 12 short term spaces for Aldi and 11 short term spaces for Homebase. A total of 19 spaces are required as set out in the Council's Parking Guidelines. However, the submitted plans indicate 18 short stay cycle spaces (9 Sheffield cycle hoops) to the north elevation. An underachievement of just 1 space is not sufficient reason for refusal. Although not indicated in the plans, long stay cycle spaces would be provided within the warehouses of both stores for staff usage.
- 8.27 **The proposal does not present sufficient connectivity improvements for cyclists and pedestrians and improvements to promote the use of public transport. This results in reliance on car travel to the site which would not justify the shortfall in car parking. The proposal is therefore contrary to Local Plan Policies TM1, TM2, TM3 and TM5 and the NPPF.**

Impact Upon Residential Amenity

- 8.28 The main alterations to the existing store from the perspective of neighbouring properties is the extension to the east elevation which is well within the site. The nearest dwellings at Sawyers Court are at a distance of over 49m and as the extension would not project above existing, it is not considered that there would be any loss of light, outlook or overlooking concerns experienced at the neighbouring properties.
- 8.29 The new Aldi service yard, as indicated within the submission, is justified in its location as being distant from residents along Ruthven Avenue. Rather, it would be closer to the residents at Sawyers Court opposite the application site on Sturlas Way at approximately 49m. However, this is an active frontage and not considered an unreasonable location in that regard. Furthermore, the proposal sets out that the service area would incorporate a sheltered canopy and dock leveller system from the ramp meaning that products can be unloaded without any external activity such as forklift trucks, scissor lifts or cages. Therefore, servicing activity, other than the arrival and departure of delivery lorries, would be largely internal.
- 8.30 The application sets out that deliveries are proposed to be between 6:30am – 11:30pm Monday to Saturday and 8am to 5pm Sunday and Bank holidays. The existing Homebase and Wickes stores have a restriction on deliveries and refuse collections of just 7:30am to 6:30pm Monday to Saturday under their original permissions. The nature of the food store requires fresh produce deliveries and to protect the amenities of existing residents in the area the Environmental Health department has recommended a condition restricting deliveries to the food store to the hours of 7am to 11pm Monday to Saturday and 9am to 9pm on Sundays only which are considered reasonable in the event of an approval.

- 8.31 The application is supported by a 'Plant and Delivery Noise Impact Assessment' to assess the impact of noise from the proposed externally mounted mechanical plant upon neighbouring residents. The location indicated for measuring the background sound levels was from a single point on Sturlas Way on approach to the Monarch's Way/Winston Churchill Way roundabout, which has a louder noise climate due to traffic noise. However, the plant would also be close to residents on Ruthven Avenue that are further away from the louder noise climate on Sturlas Way and therefore not a suitable representation of the noise impact. The assessment has not provided the exact location of the plant, presumably this is above the proposed loading bay extension behind the proposed acoustic screening. There are no details provided for the make/model of the equipment and therefore the Council's Environmental Health team are unable to assess the impact of the development upon noise sensitive receptors, being the dwellings at Sawyers Court, Ruthven Avenue, Leven Drive and Leven Close. Whilst Environmental Health has suggested conditions requiring this information, it is considered that it should form part of the application determination. Therefore, the disturbance to neighbours resulting from potential noise is not adequately addressed in this application.
- 8.32 **The proposal does not adequately address the matter of noise impact upon sensitive receptors due to the associated new plant equipment at the site. The proposal is considered contrary to Local Plan Policies EQ1 and EQ4.**

Surface Water Drainage

- 8.33 The application site is located within Flood Zone 1. A Flood Risk Assessment has been submitted which indicates that it is proposed to drain the new extension and loading ramp via a channel drain and petrol interceptor to the existing surface water system draining the car park. However, the assessment does not set out what the existing drainage method is on site other than '*it is believed to be freely discharging*'. The County Flood Authority has objected to the scheme due to insufficient information on this basis and concern over the use of petrol interceptors as opposed to above-ground SuDS, such as permeable paving or filter drains. A technical justification for the SuDS selection has not been provided.
- 8.34 The site is largely impermeable and the submission states that rainwater currently drains away from the existing building and carpark via a combination of rainwater downpipes and gullies. The extension would cover an area of approximately 100sqm and a loading ramp is to be excavated. However, the main building and hardsurfaced area is to remain as existing and there would be no additional hardsurfacing at the site. In the event of an approval it would be considered appropriate to require further details of the existing drainage system through condition.
- 8.35 **The proposal is not considered to increase the risk of flooding outside the site and would satisfy Local Plan Policies W4 and W5 and the NPPF.**

Trees and Landscaping

- 8.36 The site currently benefits from a landscape strip along Sturlas Way to the east. This contains a mix of small trees and shrubs. One large Alder tree exists in the north eastern corner of the site, this is noticeably leaning to one side and its roots have caused damage to the pedestrian footpath boundary wall given its close proximity to it. The submitted Arboricultural Impact Assessment sets out that this tree merits removal as it is unsafe and has a reduced future contribution to the area. This is considered acceptable given the close proximity of this tree to the footpath and busy roundabout, however, the tree is not within the application site and is within the County adopted verge therefore agreement with the County Highway Authority would be required for the tree to be removed.
- 8.37 The existing soft boundary treatment along Sturlas Way is proposed to be replaced and enhanced with mixed species native hedging which is considered acceptable to improve the appearance of this active site frontage.



Footpath boundary wall damage

- 8.38 The proposal sets out that a new area of soft landscaping would be provided within the north western corner of the site. Whilst not having a widely public view, the location has a backdrop of boundary planting within the neighbouring garden. The new area of soft landscaping would complement the backdrop within the currently hard surfaced corner of the site. Native shrub planting and a silver birch tree are proposed in this location. There is limited opportunity for further landscape enhancements within the site.

- 8.39 The existing tall conifer trees along the southern boundary are proposed to be retained as these provide natural screening of the site for the existing residents to the south on Ruthven Avenue.
- 8.40 **The proposal demonstrates an acceptable landscaping scheme in accordance with Local Plan Policy NEB4.**

Biodiversity and Ecology

- 8.41 The application is accompanied by an Ecological Assessment. The majority of the site comprises the building and hardstanding which offer no value in terms of biodiversity as set out in the report. Dense scrub lines the eastern and western boundary, the latter is outside the application site but partially overhangs. The section that lines the eastern boundary contains ornamental non-native species and as it provides some resources for biodiversity it is considered of local ecological importance and is proposed to be retained and enhanced with native species. The conifer trees along the southern boundary are proposed to be retained and are likely to provide commuting features for bats, a habitat for nesting birds and a source of insect forage. Lighting of the site at night would be unlikely to support notable levels of bat activity. Overall, the site was not found to support significant biodiversity and ecology opportunities. The proposal would incorporate a small area of additional planting that would provide some biodiversity gains.
- 8.42 Mitigation measures are set out in the assessment in terms of ensuring development is carried out at appropriate times to avoid disturbance to nesting birds, tree protection measures, provision of bat and bird boxes, deadwood habitat piles and native species or known wildlife beneficial planting. In the event of an approval these measures would be secured through condition.
- 8.43 **The proposal is considered to accord with Local Plan Policies NEB1, NEB3 and NEB4. The existing landscape features to be retained are of some biodiversity value as they assist in the green infrastructure of the urban site. The site would be enhanced further with new area of soft landscaping.**

Other Matters

- 8.44 *Land Contamination* – A Phase I land contamination report has been submitted with this application which recommends further investigation with regards to risks from several contaminants (localised hydrocarbons, metals, inorganic chemicals, ground gases and asbestos). In the event of an approval a condition should be imposed for the phase II site investigation and risk assessment, remediation strategy and verification report to be submitted for approval. A further condition would be required for an asbestos survey to be conducted.
- 8.45 *Section 52 Agreement* - The unit is subject to a historic Section 52 Agreement (dated 31st January 1984) under planning approval 7/838/1984. The agreement prevents the estate (site) being used for “*the purposes of a retail or wholesale food shop or store*”. Accordingly, if the application were to be

approved for the part-use of the building as an Aldi foodstore, it will be necessary to discharge the Section 52 agreement.

9.0 CONCLUSION

- 9.1 The proposal to sub-divide the existing building to provide an Aldi foodstore alongside the Homebase store is not considered acceptable in principle. The scheme is considered contrary to the aims and objectives of this allocated site whereby a comprehensive high density mixed-use development is sought to make efficient use of the town centre location and to enhance the vitality of Waltham Cross town centre..
- 9.2 The layout of the proposal is not considered to integrate with the town centre through its inappropriate orientation and lack of connectivity.
- 9.3 The proposal fails to promote travel to the site via cycling, walking or use of public transport. There is insufficient connectivity improvements for cyclists, pedestrians and improvements to the nearest bus stops.
- 9.4 Given the lack of improvements to encourage alternative modes of transport the car parking spaces within the site are considered insufficient to justify the shortfall in spaces.
- 9.5 The assessment of noise impact to neighbouring residents is judged to be inadequate.
- 9.6 The matters of surface water drainage, trees, landscaping, biodiversity and ecology and land contamination are considered to be acceptable.

10. RECOMMENDED that planning permission be refused for the following reasons:

- (a) the proposed development would undermine the Council's ability to pursue a comprehensive mixed use development at the allocated site contrary to policies WC2, DS1, PM1, RTC2 and DSC7 of the Broxbourne Local Plan 2018 – 2033 and the Waltham Cross Town Centre Strategy (2015);**
- (b) the proposal presents a layout that is not considered to integrate with the town centre and fails to enhance the character and appearance of the wider area. The proposal would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre. The proposal is considered contrary to policies WC2, PM1, DSC1, DSC3, DSC7 and DSC8 of the Broxbourne Local Plan 2018 – 2033 and the Waltham Cross Town Centre Strategy (2015);**
- (c) the proposed development would not provide sufficient connectivity improvements for cyclists and pedestrians and improvements to promote the use of public transport. The proposal is therefore**

contrary to policies TM1, TM2 and TM3 of the Broxbourne Local Plan 2018 – 2033 and the NPPF;

(d) the proposal does not adequately address the shortfall in car parking spaces at the site and is therefore contrary to policy TM5 of the Broxbourne Local Plan 2018 – 2033; and

(e) insufficient information has been submitted for the proposed roof plant equipment. Therefore, the noise impact upon the amenity of neighbouring occupants is not fully addressed contrary to policies EQ1 and EQ4 of the Broxbourne Local Plan 2018 – 2033.

Appendix III

Planning Permission Ref. 7.383.1984 (22.05.84)

Town Planning 7/383-84
Ref. No.

Other
Ref. No.

TOWN & COUNTRY PLANNING ACTS, 1971 and 1972

THE DISTRICT COUNCIL OF BROXBOURNE
IN THE COUNTY OF HERTFORD

To
Homebase Limited,
Stamford House,
Stamford Street,
London, S.E.1.

.....Erection of a single storey retail store, with
open air garden centre and ancillary car
parking:
at Acorn Works, Sturlas Way, Waltham Cross.

Brief
description
and location
of proposed
development.

In pursuance of their powers under the above-mentioned Acts and the Orders and Regulations for the time being in force thereunder, the Council hereby permit the development proposed by you in your application dated12th April 1984.....
and received with sufficient particulars on.....13th April 1984.....
and shown on the plan(s) accompanying such application, subject to the following conditions:-

- (1) The development to which this permission relates shall be begun within a period of5. years commencing on the date of this notice.

See attached schedule

The reasons for the Council's decision to grant permission for the development subject to the above conditions are:—

- (1) To comply with the requirements of Section 41 of the Town & Country Planning Act, 1971.

See attached schedule

Dated.....22nd.....day of.....May.....1984.....

Signed.....

Designation Director of Technical
services

NOTE

(1) If the applicant wishes to have an explanation of the reasons for this decision it will be given on request and a meeting arranged if necessary.

(2) If the applicant is aggrieved by the decision of the local planning authority to refuse permission or approval for the proposed development, or to grant permission or approval subject to conditions, he may appeal to the Secretary of State for the Environment, in accordance with section 36 of the Town and Country Planning Act 1971, within six months of receipt of this notice. Appeals must be made on a form which is obtainable from the Secretary of State for the Environment, Marsham Street, London, S.W.1.) The Secretary of State has power to allow a longer period for the giving of a notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Secretary of State is not required to entertain an appeal if it appears to him that permission for the proposed development could not have been granted by the local planning authority, or could not have been so granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements, to the provisions of the development order, and to any directions given under the order.

(3) If permission to develop land is refused, or granted subject to conditions, whether by the local planning authority or by the Secretary of State and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the Common Council, or on the Council of the county borough, London borough or county district in which the land is situated, as the case may be, a purchase notice requiring that council to purchase his interest in the land in accordance with the provisions of Part IX of the Town and Country Planning Act 1971.

(4) In certain circumstances, a claim may be made against the local planning authority for compensation, where permission is refused or granted subject to conditions by the Secretary of State on appeal or on a reference of the application to him. The circumstances in which such compensation is payable are set out in section 169 of the Town and Country Planning Act 1971.

7/383-84

2. Notwithstanding the provisions of the Town and Country Planning (Control of Advertisement) Regulations 1969 no advertisements or signs shall be displayed on the site without the prior consent of the Local Planning Authority.

Reason - (a) In the interest of the appearance and character of the area.
(b) In the interest of highway safety.

3. A turning area shall be provided for service vehicles within the site and made available for that purpose at all times.

Reason - So that service vehicles may enter and leave the site in forward gear.

4. Details of the pedestrian accesses to and exits from the site shall be submitted to and approved by the Local Planning Authority and completed to their satisfaction before any part of the development hereby approved is first brought into use.

Reason - To ensure a satisfactory pedestrian access to the site.

5. The proposed development shall be carried out and completed in accordance with the proposals set out in the application and any plan or drawing submitted therewith before the building is occupied, unless the Local Planning Authority otherwise agrees in writing.

Reason - To ensure the proposed development will be carried out as approved, and to avoid any detriment to amenity by reason of works remaining uncompleted.

6. That samples/details of all external facing and roofing materials shall be submitted to and approved by the Local Planning Authority before any part of the development commences.

Reason - To enable the Local Planning Authority to consider the details of the materials to be used for the development.

7. That details/samples of all surfacing materials to be used shall be submitted to and approved by the Local Planning Authority before development commences.

Reason - To secure a satisfactory appearance.

8. That details of all screen and boundary walls, fences and any other means of enclosure shall be submitted to and approved by the Local Planning Authority before any part of the development hereby approved is commenced; such approved means of enclosure to be erected to the satisfaction of the Local Planning Authority before any of the building hereby approved is occupied, unless the Local Planning Authority otherwise agrees in writing.

Reason - To ensure that the proposed development does not adversely affect the privacy and visual amenities at present enjoyed by the occupiers of the adjoining and nearby properties.

9. That plans of the site showing the existing and proposed ground levels and levels of thresholds of all proposed buildings shall be submitted to and approved by the Local Planning Authority before any part of the development hereby approved is commenced.

Reason - To ensure that the work is carried out at suitable levels in relation to adjoining properties and highways, having regard to amenity, access, highway and drainage requirements.

Cont.

10. The land indicated on the drawings for the parking and turning of vehicles shall not be used for any other purpose, and shall be kept available for these purposes to the satisfaction of the Local Planning Authority unless the Local Planning Authority otherwise agrees in writing.

Reason - To ensure adequate provision of off-street parking and turning space, in the interests of road safety and the appearance and character of the area.

11. No raw materials, finished or unfinished products, parts, crates, packing materials or waste shall be kept in the open on the site other than in the area defined as garden centre on drawing no. 1453/18C unless the Local Planning Authority otherwise agrees in writing.

Reason - To ensure satisfactory planning of the site.

12. No tank rooms, plant or other structures shall be erected above the main roof of the building unless the Local Planning Authority otherwise agrees in writing.

Reason - To ensure that the appearance of the premises is satisfactory and to safeguard the character of the immediate area.

13. A landscaping scheme shall be submitted to and approved by the Local Planning Authority before any work on the development commences, such approved scheme to be carried out and completed within 1 year of the commencement of the development or such longer period as may be agreed in writing by the Local Planning Authority.

Reason - To enhance the general appearance of the development.

14. The landscaping scheme submitted in compliance with the requirements of Condition 13 above shall comprise a contoured plan to a minimum scale of 1:500 showing the existing features to be retained, new features proposed and the treatment thereof. The features to be shown shall include:-

- (i) All trees, shrubs, hedges or other planting, including grassed areas.
- (ii) In relation to all trees, the position of trunks or stems, and the spread is to be shown to scale and the species indicated.
- (iii) The measures to be taken to protect existing trees, shrubs and hedges on the site.
- (iv) Public footways, steps, slopes and any paved areas.
- (v) Any earthworks, embankments and walls.

Reason - To enhance the general appearance of the development.

15. In the event of the death or destruction of any tree shrub or hedge to which Condition 13 above relates, within 5 years of occupation, due to felling, cutting down, uprooting or in any other manner then unless the Local Planning Authority have dispensed in writing with this requirement there shall be replanted in its place, within such period and of such size and species as shall have been approved by the Local Planning Authority, another tree, shrub or hedge.

Reason - To enhance the general appearance of the development.

16. No tree, shrub or hedge on the site shall be lopped, topped, felled or otherwise interfered with without the agreement in writing of the Local Planning Authority.

Reason - To assimilate the development into the landscape and to safeguard the appearance and character of the area.

7/383-84

17. The land outlined in blue shown on drawing 1453/18G shall only be used for ancillary parking for a limited period expiring on or before 1st June 1989, when the use hereby permitted shall be discontinued and any buildings or works carried out under this permission (within the area edged blue) shall be removed and the land reinstated, unless in the meantime a further application has been submitted to and approved by the Local Planning Authority.

Reason - To safeguard the land required for the Cheshunt Link Road.

18. The premises shall be used for the storage, wholesale and retail, of articles for home decoration, maintenance and improvement, garden goods and equipment, and self-assembly furniture and for no other purpose including any other purpose in Class I of the Schedule to the Town & Country Planning (Use Classes) Order 1972.

Reason - To enable the Local Planning Authority to retain control over the use of the site.

19. Deliveries to and refuse collection from the premises shall be limited to the hours of 7.30 a.m. to 6.30 p.m., Mondays to Saturdays, and there shall be no deliveries or refuse collection at any time on Sundays and Bank or Statutory Holidays.

Reason - In the interest of the amenities of adjoining residents.

20. Details of all lighting and floodlighting of the site including the car parking areas shall be submitted to and approved by the Local Planning Authority, before they are installed.

Reason - To safeguard the amenities of adjoining residential properties.

21. Details of the sprinkler storage tank shall be submitted to and approved by the Local Planning Authority before the tank is installed.

Reason - To safeguard the overall planning of the site.

22. The height of storage within the open garden centre as shown on drawing 1453/18G shall not exceed 3 metres in height.

Reason - To safeguard the amenities of adjoining residential properties.

23. The surface water discharge from this site shall not be prejudicial to the existing sewerage system. Details of outlet points, off-site works and discharge flows shall be submitted to and approved by the drainage authority prior to the development commencing.

Reason - In order to enable the site to be drained in a satisfactory manner.

Appendix IV

Planning Permission Ref. 7.0757.05.F.WX (28.10.05)

TOWN AND COUNTRY PLANNING ACT, 1990

Reference No: 7/0757/05/F/WX

London & Cambridge Properties
LCP Management Ltd
20th Floor
Milbank Tower
Milbank
London
SW1P 4QP

Description of Development: Variation of condition 18 of planning permission (ref. 7/0383-84) to allow the sale of all non-food items (A1)

Location of Development: Homebase Ltd Sturlas Way Waltham Cross Hertfordshire EN8 7BF

In pursuance of their powers under the above-mentioned Acts and the Orders and Regulations for the time being in force thereunder, the Council **HEREBY PERMIT** the development proposed by you in your application dated 23rd August 2005 and received with sufficient particulars on 5th September 2005

The council resolution to come to this decision was based on an assessment of compliance with relevant policies in the development plan, taking into account all material considerations, and shown on the plan(s) accompanying such application.

Dated: 28th October 2005

Signed:.....
Director of Environmental Services

Dc1001mw

TOWN AND COUNTRY PLANNING ACT 1990

Appeals to the Deputy Prime Minister

- If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Deputy Prime Minister via the Planning Inspectorate under Section 78 of the Town and Country Planning Act 1990.
- If you want to appeal, then you must do so within six months of the date of this notice, using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN.
- The Deputy Prime Minister can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Deputy Prime Minister need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the proposed development or could not have granted it without the conditions it imposed, having regard to the statutory requirements, to the provisions of the development order and to any directions given under the order.
- In practice, the Deputy Prime Minister does not refuse to consider appeals solely because the Local Planning Authority based its decision on a direction given by him.

Purchase Notices

- If either the Local Planning Authority or the Deputy Prime Minister refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor can he render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council of the District or London Borough in which the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Compensation

- In certain circumstances compensation may be claimed from the Local Planning Authority if permission is refused or granted subject to conditions by the Deputy Prime Minister on appeal or on reference of the application to him.
- These circumstances are set out in Sections 114 and related provisions of the Town and Country Planning Act 1990.

Appendix V

Letters of Support to Application Ref. 07/21/0519/F
from LCP Ltd (on behalf of Rookman Properties Ltd)
and Homebase Ltd

To Members of the Planning Committee

Dear Sirs,

Refurbishment of the Existing Homebase Retail Store, Waltham Cross – Application 07/21/0519/F

I am writing to you on behalf of Homebase Ltd in relation to the above application, which is being considered by Committee on 28 July 2021 (Agenda Item 6c). Whilst Homebase note that the application is recommended for refusal, we would urge you to defer the application to enable further discussions to take place over the technical and policy issues that have been raised by Officers.

As you may be aware, Homebase, under the ownership of HHGL Ltd, has recently emerged successfully from a difficult trading position in 2018. The business has seen a significant turnaround under new management that has resulted in all its stores trading profitably and placed the business in a strong position to grow and to contribute to the UK's economic recovery post Covid 19. The Waltham Cross Homebase is very successful and profitable, and forms an integral and important part of our national portfolio. Homebase is firmly committed to ongoing future investment in all of its existing stores, as well as investing in its staff's qualifications, knowledge and expertise.

Homebase has recently engaged successfully with Aldi on a number of similar sites nationally, where existing stores have been too large for our current requirements and there is an opportunity to bring forward a complimentary retailer to utilise surplus space. That is precisely what is proposed at our Waltham Cross site. The added benefits are that the Aldi investment will enable the store building and site to be significantly upgraded and improved, enhancing the contribution it makes to the local townscape and driving increased footfall throughout this part of the town centre. The 50 local jobs created by Aldi would support the 30 jobs currently provided within our store, at a time when these jobs are much needed.

Homebase is firmly committed to retaining this store and to serving successfully, as it has done for a number of years, the home improvement and gardening needs of the residents of Waltham Cross. If planning permission was refused, the site would continue to trade as a Homebase. Our store benefits, by law, from a protected tenancy and rights to renew our lease. Homebase will, in the event of a refusal, simply renew and extend the current lease, over the whole site, for a further period of fifteen years. Even though, therefore, the Committee report refers to potential redevelopment options, these protected rights mean that the site is not available for redevelopment.

Whilst we also note references in the Committee report to Policy WC2 and its supporting text of the Broxbourne Local Plan, Members should be reminded that the objective of this allocation is to secure the most sustainable future for this site. Central to that is the future of the Homebase, which the policy/text confirms may result in the "*status quo*" or a mixed-use redevelopment incorporating the Homebase or its closure and relocation elsewhere. The wording of the policy/text was amended in response to our appearance at the Local Plan Hearings and was agreed with Officers to reflect the Local Plan Inspectors recommendation, in response to our objections, that the policy/text should provide a more flexible approach that recognised the options for retaining Homebase on site and the leasehold constraints imposed on the availability of the site for redevelopment.

I hope this clarifies Homebase's position and look forward to receiving your support for a deferral.

Yours faithfully,

Neil Robinson MRICS
Estates Manager – Homebase Property

Correspondence Addresses:

HHGL Limited t/a Homebase, Witan Gate House, 500-600 Witan Gate, Milton Keynes, MK9 1BA
Homebase Rooms Limited, Witan Gate House, 500-600 Witan Gate, Milton Keynes, MK9 1BA
Hampten Group t/a Homebase, 21 Arthur Street, Belfast, BT1 4GA
HHGL (ROI) Limited t/a Homebase, Riverside One, Sir John Rogerson's Quay, Dublin 2, D02X576

Registered in England and Wales No. 00533033
Registered in England and Wales No. 12095209
Registered in Northern Ireland No. NI011639
Registered in Ireland No. 127841



L.C.P. Management Ltd
20th Floor
Millbank Tower
Millbank
London
SW1P 4QP

DX149244
VICTORIA 13

To Members of the Planning Committee

T 020 7233 5255
F 020 7233 5266

28 July 2021

Dear Sirs

RE: Homebase store, Sturlas Way, Waltham Cross - 07/21/0519/F

I write on behalf of Rookman Properties Ltd, the freehold owner of the above site, in relation to the above application, which is being considered by Committee on 28 July 2021 (Agenda Item 6c). Whilst we note that the application is recommended for refusal, we would urge you to defer the application to enable further discussions to take place over the technical and policy issues that have been raised by Officers.

The site has been occupied as a DIY warehouse (c.34,000 sq ft) for the past 25yrs. This is one of Homebase's most successful and profitable store's. In late 2019, having engaged with Homebase, we were approached by ALDI supermarket as they were looking to invest in opening a new c.18,500 sq ft store in Waltham Cross. The idea being to retain the existing store footprint for the use by both retailers, bringing significant investment to the site by way of refurbishment and modernisation with only minor alterations and a small extension sought. This would mean the retention of a long standing town centre retail occupier (at a time when retailers are downsizing, making redundancies and town centre sites becoming derelict) as well as the inward investment of one of the Country's fastest growing supermarket retailers.

We feel this proposal will be a major benefit to Waltham Cross town centre; it brings regeneration to an otherwise tired looking site, it enhances the retail offer, it brings new investment, improves the vitality and will create 50 new jobs in addition to the existing 30 at Homebase.

Please understand, if the application is refused the Landlord doesn't automatically obtain possession, as the Tenant has a protected tenancy with legal rights to renew their lease for a further period of up to fifteen years. Even though the Committee report refers to potential redevelopment options, these protected rights mean that the site is not available for redevelopment. The only way the site could be obtained for redevelopment would be by the Council using compulsory purchase powers, at great expense and tax-payers money.

We don't believe this to be a controversial application. It's not a new development. The physical changes are minor and the proposed widening of the use to include a foodstore falls within the new Class E use under the TCP Use Classes Amendment Regulations 2020.

In summary, the applicant would like the opportunity to resolve any concerns raised in the officer's report and is thus seeking an extension of time for the application to be deferred until the September 21 planning committee meeting.



I hope this clarifies the owner's position and would welcome your consideration to granting an extension of time to this application rather than a refusal.

Yours sincerely

A handwritten signature in black ink that reads 'Julian Diamond'.

Julian Diamond
Director

Appendix VI

Waltham Cross Town Centre Strategy (2015)

Please See Separately Submitted Document

Appendix VII

Extract from Broxbourne Retail & Leisure Study
Addendum (June 2016)

BOROUGH OF BROXBOURNE COUNCIL

Broxbourne Retail & Leisure Study

Retail Addendum

June 2016



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Appendices

Appendix 1: Retail Capacity Statistical Tables

1.0 Introduction

- 1.1.1 This addendum note has been prepared by WYG on behalf of the Borough of Broxbourne Council. It represents an addendum to the July 2015 Borough of Broxbourne Retail & Leisure Study.
- 1.1.2 Since the publication of the Study retail data provider, Experian, has published a new retail expenditure briefing note (Retail Planner Briefing Note 13 (RPBN 13) – October 2015). In addition, grocery sales density data provider, Verdict, has also published new updated convenience goods sales density figures (August 2015).
- 1.1.3 The RPBN 13 contains new up to date forecasts of expenditure per head, special forms of trading forecasts as well as sales density changes, all of which form an important input into the Retail Capacity Assessment contained within the Retail & Leisure Study.
- 1.1.4 Accordingly, revised retail capacity/quantitative need figures have been prepared taking into account of the latest expenditure projections and sales density data. For the avoidance of doubt, all other elements of the Retail Study methodology and assumptions remain.
- 1.1.5 Updated quantitative retail capacity statistical tables are contained at Appendix 1 of this addendum note.

2.0 The Updated Retail Capacity Results

2.1 Convenience Goods Capacity

2.1.1 Figure 2.1 below shows that the overall convenience goods minimum floorspace capacity requirements in 2030 have reduced by 3,400sq m net with the maximum floorspace requirements reducing by 5,600sq m net.

Figure 2.1: Summary of Convenience Goods Floorspace Need in Borough of Broxbourne, 2030 (sq m net)

July 2015 Retail Study		June 2016 Update		Difference	
Min	Max	Min	Max	Min	Max
9,400	13,200	6,000	7,600	-3,400	-5,600

Source: Updated Table 6c of Appendix A
Table 6c of Appendix F, July 2015 Retail Study
2012 Prices

2.1.2 The reduction in convenience goods floorspace requirements is partly attributable to the reduced forecasts of growth in convenience goods expenditure per head; the higher convenience goods sales density growth and the reduced level of overtrading of convenience goods facilities (as a result of changes to grocers benchmark/average sales densities).

2.1.3 Figure 2.2 summarises the headline updated quantitative and floorspace convenience goods capacity figures at 5 year intervals after relevant retail commitments.

Figure 2.2: Quantitative Need for Convenience Goods Floorspace in Borough of Broxbourne

Year	Convenience Goods				
	£m			Floorspace Requirement (sq m net)	
	Surplus (£m)	Commitments (£m)	Residual (£m)	Min ^{1*}	Max ^{2*}
2015	71.8	10.7	61.1	4,900	6,200
2020	77.2	10.6	66.6	5,400	6,800
2025	80.9	10.6	70.3	5,700	7,200
2030	84.8	10.6	74.2	6,000	7,600

Source: Updated Table 6c of Appendix 1

¹ Average sales density assumed to be £12,458per sq m at 2015 (based on the average sales density of the leading four supermarket operators as identified by Verdict 2015)

² 50% of residual expenditure assumed to be consumed by leading four supermarkets (£12,458/sq m) and 50% assumed to be consumed by discount operators (£7,339 per sq m). This equates to £9,899/sq m.
2012 Prices

2.1.4 The residual capacity spend to support additional convenience goods floorspace in the Borough is calculated to be £66.6m by 2020, increasing to £70.3m by 2025, and to £74.2m by 2030. Converting these figures through average sale densities a potential convenience goods floorspace capacity in the Borough of between 6,000sqm and 7,600sq m net is identified by 2030.

2.2 Comparison Goods Capacity

2.2.1 Figure 2.3 sets out the overall comparison goods floorspace capacity requirements in 2030. It shows that:

- 1) under the constant market share scenario minimum floorspace requirements have reduced by 1,400sq m net with the maximum floorspace requirements reducing by 2,500sq m net.
- 2) Under the market share uplift scenario minimum floorspace requirements have decreased by 1,800sq m net whilst maximum floorspace requirements have decreased by 3,300sq m net.

Figure 2.3: Summary of Comparison Goods Floorspace Need in Borough of Broxbourne, 2030 (sq m net)

	July 2015 Retail Study		June 2016 Update		Difference	
	Min	Max	Min	Max	Min	Max
Constant Market Share	13,300	23,900	11,900	21,400	-1,400	-2,500
Market Share 'Uplift' Scenario	25,000	45,000	23,200	41,700	-1,800	-3,300

Source:
Updated Tables 26c and 27c of Appendix 1
Tables 26c and 27c of Appendix F, July 2015 Retail Study
2012 Prices

2.2.2 Figure 2.4 provides a summary of the updated quantitative and floorspace comparison goods capacity figures after taking into account comparison goods retail commitments.

Figure 2.4: Quantitative Need for Comparison Goods Floorspace in Borough of Broxbourne – Market Share 'Uplift' Scenario

Year	Comparison Goods				
	£m			Floorspace Requirement (sq m net)	
	Surplus (£m)	Commitments (£m)	Residual (£m)	Min ^{1*}	Max ^{2*}
Constant Market Share					
2020	9.7	13.6	-3.9	-	-
2025	44.5	15.0	29.5	5,300	9,600
2030	89.0	16.5	72.4	11,900	21,400
Market Share 'Uplift' Scenario					
2020	25.5	13.6	11.9	2,400	4,300
2025	82.6	15.0	67.6	12,200	22,000
2030	157.9	16.5	141.4	23,200	41,700

Source:
Updated Tables 26c and 27c of Appendix 1
2012 Prices

-
- 2.2.3 After taking account of commitments, under the constant market share scenario, a residual spend of £29.5m is identified at 2025, increasing to £72.4m by 2030. Converting this expenditure capacity to potential floorspace capacity by adopting suitable average sales densities, it is assessed that there is potential capacity for new comparison goods floorspace in the Borough of between 11,900sq m and 21,400sq m net is identified by 2030.
- 2.2.4 Under the market share 'uplift' scenario, the residual spend is calculated at £11.9m by 2020, increasing to £67.6m by 2025, and to £141.4m by 2030. As illustrated in Figure 2.4, converting these figures through average sales densities identifies a potential comparison goods floorspace capacity in the Borough of between 23,200sq m net and 41,700sq m net by 2030 under the market share 'uplift' scenario.

3.0 Conclusions

- 3.1.1 This addendum note has been prepared by WYG on behalf of the Borough of Broxbourne Council. It represents an addendum to the July 2015 Borough of Broxbourne Retail & Leisure Study.
- 3.1.2 The addendum note sets out revised retail capacity/quantitative retail need figures taking into account new up to date forecasts of expenditure per head, special forms of trading forecasts, and sales density changes.
- 3.1.3 The updated retail capacity/quantitative retail need assessment identifies the following revised turnover/floorspace capacity requirements for the Borough by 2030:

	2030		
	Turnover Capacity	Floorspace Requirement (sq m net)	
	(£m)	Min	Max
Convenience Goods	74.2	6,000	7,600
Comparison Goods (Constant Market Share)	72.4	11,900	21,400
Comparison Goods (Market Share 'Uplift')	141.4	23,200	41,700

APPENDICES

Appendix 1

Statistical Retail Capacity Tables

WYG Planning

Broxbourne Retail Capacity Study Update - May 2016

Updated Table 1: Population and Convenience Goods expenditure per capita

Zone	Population				Per capita expenditure Convenience (£)					
	2015	2020	2025	2030	2012 <i>inc SFT</i>	2012	2015	2020	2025	2030
1	22,519	23,208	23,894	24,544	2,019	1,983	1,890	1,858	1,824	1,801
2	18,131	18,681	19,173	19,698	2,062	2,025	1,931	1,897	1,863	1,840
3	20,108	20,785	21,499	22,150	2,177	2,138	2,038	2,003	1,966	1,942
4	35,606	36,695	37,803	38,725	1,901	1,866	1,780	1,749	1,717	1,696
Sub Total	96,364	99,369	102,369	105,117						
5	13,460	13,835	14,208	14,525	2,180	2,141	2,041	2,006	1,969	1,945
6	33,855	34,477	35,247	36,157	2,027	1,990	1,898	1,865	1,831	1,808
7	54,916	57,846	60,457	62,904	1,637	1,607	1,533	1,506	1,479	1,461
8	67,694	69,237	70,924	72,319	1,908	1,874	1,787	1,756	1,724	1,703
9	17,188	17,580	18,044	18,422	2,245	2,205	2,103	2,066	2,028	2,003
10	11,562	12,092	12,582	12,971	2,197	2,158	2,057	2,022	1,985	1,960
11	35,647	36,984	38,219	39,251	2,113	2,075	1,979	1,944	1,909	1,885
12	23,003	24,193	25,349	26,275	2,014	1,978	1,886	1,853	1,819	1,797
13	58,427	60,067	61,670	63,245	1,880	1,846	1,761	1,730	1,699	1,678
Total	412,116	425,680	439,069	451,186						

Notes:

a. Zones based on the following post code sectors

- 1 - EN11 0, EN11 8, EN11 9
- 2 - EN10 6, EN10 7
- 3 - EN7 5, EN7 6
- 4 - EN8 0, EN8 9, EN8 8, EN8 7
- 5 - EN9 2, CM19 5
- 6 - EN9 1, EN9 3, IG10 4, E4 7
- 7 - EN3 4, EN3 5, EN3 6, EN3 7
- 8 - EN1 1, EN1 3, EN1 4, EN2 0, EN2 6, EN2 7, EN2 8, EN2 9
- 9 - EN6 1, EN6 4, EN6 5
- 10 - AL9 6, SG13 8, SG14 1
- 11 - SG12 0, SG12 7, SG14 2, SG14 3
- 12 - SG12 8, SG12 9, SG13 7
- 13 - CM18 6, CM18 7, CM19 4, CM20 1, CM20 2, CM20 3

b. Per capita expenditure derived from Experian MMG3 data (2014 report)

c. Population derived from Experian MMG3 data (2014 report)

d. Per capita expenditure projected forward using forecast growth rates taken from Table 1a of Experian Retail Planner Briefing Note 13

e. Expenditure excludes Special Forms of Trading in line with 'adjusted' allowance derived from Annex 3 of Experian Retail Planner Briefing Note 13

2012 Prices

WYG Planning

Broxbourne Retail Capacity Study Update - May 2016

Updated Table 2A: Total convenience goods expenditure

Zone	Expenditure (£m)				Growth (£m)		
	Convenience				Convenience		
	2015	2020	2025	2030	2015-20	2015-25	2015-30
1	42.6	43.1	43.6	44.2	0.5	1.0	1.6
2	35.0	35.4	35.7	36.2	0.4	0.7	1.2
3	41.0	41.6	42.3	43.0	0.6	1.3	2.0
4	63.4	64.2	64.9	65.7	0.8	1.5	2.3
Sub Total	181.9	184.4	186.5	189.1	2.4	4.5	7.2
5	27.5	27.8	28.0	28.3	0.3	0.5	0.8
6	64.2	64.3	64.5	65.4	0.0	0.3	1.1
7	84.2	87.1	89.4	91.9	3.0	5.2	7.7
8	121.0	121.6	122.3	123.1	0.6	1.3	2.2
9	36.1	36.3	36.6	36.9	0.2	0.5	0.8
10	23.8	24.4	25.0	25.4	0.7	1.2	1.6
11	70.5	71.9	73.0	74.0	1.4	2.4	3.5
12	43.4	44.8	46.1	47.2	1.5	2.7	3.8
13	102.9	103.9	104.8	106.1	1.1	1.9	3.2
Total	755.5	766.6	776.0	787.4	11.1	20.5	31.9

Updated Table 2B: Convenience goods expenditure split between main food shopping and top-up food shopping spend

Zone	Expenditure (£m)		
	Convenience - 2015		
	Main	Top-up	Total
1	34.68	7.89	42.57
2	27.81	7.19	35.00
3	33.78	7.20	40.99
4	53.05	10.32	63.37
Sub Total	149.33	32.61	181.93
5	20.20	7.28	27.48
6	49.31	14.94	64.25
7	68.80	15.38	84.18
8	88.32	32.63	120.95
9	30.51	5.63	36.14
10	19.44	4.34	23.79
11	56.44	14.09	70.53
12	35.71	7.67	43.38
13	83.11	19.76	102.87
Total	601.2	154.3	755.5

Notes:

a. Zones based on the following post code sectors

- 1 - EN11 0, EN11 8, EN11 9
- 2 - EN10 6, EN10 7
- 3 - EN7 5, EN7 6
- 4 - EN8 0, EN8 9, EN8 8, EN8 7
- 5 - EN9 2, CM19 5
- 6 - EN9 1, EN9 3, IG10 4, E4 7
- 7 - EN3 4, EN3 5, EN3 6, EN3 7
- 8 - EN1 1, EN1 3, EN1 4, EN2 0, EN2 6, EN2 7, EN2 8, EN2 9
- 9 - EN6 1, EN6 4, EN6 5
- 10 - AL9 6, SG13 8, SG14 1
- 11 - SG12 0, SG12 7, SG14 2, SG14 3
- 12 - SG12 8, SG12 9, SG13 7
- 13 - CM18 6, CM18 7, CM19 4, CM20 1, CM20 2, CM20 3

b. Per capita expenditure derived from Experian MMG3 data (2014 report)

c. Population derived from Experian MMG3 data (2014 report)

d. Per capita expenditure projected forward using forecast growth rates taken from Table 1a of Experian Retail Planner Briefing Note 13

e. Expenditure excludes Special Forms of Trading in line with 'adjusted' allowance derived from Annex 3 of Experian Retail Planner Briefing Note 13

f. Figures derived from multiplying per capita expenditure with population within each zone using data provided at Updated Table 1

2012 Prices

Updated Table 3: Convenience goods shopping patterns

Destination	Total		Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6		Zone 7		Zone 8		Zone 9		Zone 10		Zone 11		Zone 12		Zone 13		
	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	
Study Area																													
Zone 1																													
Aldi, Taverners Way, Hoddesdon	3.4	1.6	19.3	13.8	9.0	9.0	0.8	2.7	4.7	3.5	9.6	2.5	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.0	1.2	0.0	10.5	0.0	4.0	2.6	0.0	0.0	
Asda, High Street, Conduit Lane, Hoddesdon	1.0	1.0	4.4	11.5	7.7	3.3	0.0	1.4	0.8	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	6.9	1.8	0.0	0.0	
Co-op, Stanstead Road, Hoddesdon	0.0	0.4	0.0	4.5	0.0	0.0	0.0	0.0	0.0	1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Iceland, Brocket Road, Hoddesdon	0.0	0.2	0.5	1.7	0.0	3.9	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Morrisons, Amwell Street, Hoddesdon	4.2	0.9	15.7	10.0	8.8	3.3	1.0	2.9	2.5	0.0	2.5	3.6	0.0	0.0	12.9	0.0	0.0	0.0	0.0	0.0	0.7	0.8	5.9	0.0	3.1	0.0	0.0	0.0	
Sainsbury's, Brewery Road, Hoddesdon	4.7	2.6	35.1	17.8	24.9	8.5	2.6	2.0	3.2	0.9	8.6	4.6	1.7	0.0	0.0	0.0	0.0	0.0	2.7	0.0	8.7	9.8	2.3	0.0	11.5	18.8	0.0	0.0	
Tesco Express, Burford Street, Hoddesdon	0.1	0.9	0.0	14.2	0.0	2.6	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Express, High Street, Hoddesdon	0.0	0.1	0.0	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Hoddesdon	0.0	1.0	0.0	16.2	0.0	1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Zone 1)	13.4	8.7	75.0	91.9	50.4	32.1	4.4	9.9	12.1	5.9	20.7	10.7	1.7	0.0	13.7	0.0	0.0	0.0	3.9	0.0	10.6	10.6	18.7	1.2	25.5	23.2	0.0	0.0	
Zone 2																													
Local shops, Broxbourne	0.0	0.2	0.0	0.0	0.4	10.5	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Wormley	0.0	0.1	0.0	0.0	0.0	5.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Zone 2)	0.0	0.3	0.0	0.0	0.4	15.9	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Zone 3																													
Co-op, Goff's Lane, Goff's Oak	0.0	1.0	0.0	0.0	0.0	0.0	0.5	19.3	0.0	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Express, Hammond Court, Waltham Cross	0.1	1.9	0.0	0.0	0.0	0.0	0.9	13.5	0.0	0.0	0.0	0.0	0.0	2.4	0.0	0.0	0.0	0.0	0.0	24.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Zone 3)	0.1	2.9	0.0	0.0	0.0	0.0	1.4	32.8	0.0	1.3	0.0	0.0	0.0	2.4	0.0	0.0	0.0	0.0	0.0	24.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Zone 4																													
Co-op, Church Lane, Cheshunt	0.1	1.3	0.0	0.0	0.0	1.6	0.5	3.4	1.3	12.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	0.0	0.0	0.0	0.0	0.0	0.0	
Iceland, High Street, Waltham Cross	0.1	0.5	0.0	0.0	0.0	1.1	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Lidl, High Street, Waltham Cross	1.4	2.9	0.0	0.0	0.0	0.0	7.4	1.8	5.1	5.6	0.0	0.0	2.0	0.0	1.2	3.9	0.0	2.5	0.0	0.0	0.0	0.9	13.3	0.9	0.0	0.0	0.0	0.0	
Marks and Spencer, Brookfield Centre, Cheshunt	0.8	0.9	0.0	0.7	1.4	9.8	6.2	0.9	1.9	4.3	0.7	4.0	0.0	0.0	0.8	0.0	0.0	0.0	1.2	1.6	0.0	2.1	0.0	0.0	0.0	0.0	0.0	0.0	
Sainsbury's, The Pavilion High Street, Waltham Cross	3.2	1.6	0.0	0.0	0.0	0.0	0.5	1.8	7.2	13.7	0.0	0.0	3.1	2.7	14.8	1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Express, High Street, Waltham Cross	0.1	0.2	0.0	0.0	0.0	0.0	0.5	0.0	1.0	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Extra, Brookfield Centre, Cheshunt	14.7	3.1	15.9	0.0	43.4	18.3	58.8	20.5	52.2	17.2	2.2	0.0	2.3	0.0	4.8	0.0	1.7	0.0	31.2	0.0	5.8	0.0	15.2	1.7	0.0	0.0	2.5	0.9	
Tesco Metro, Turners Hill, Cheshunt	1.8	1.8	1.2	0.7	1.9	10.8	9.1	8.7	11.2	13.8	0.0	0.0	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Cheshunt	0.1	0.6	0.0	0.0	0.0	0.0	0.0	3.6	0.9	4.3	0.0	1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Waltham Cross	0.1	0.8	0.0	0.0	0.0	0.0	0.0	4.7	0.0	3.0	0.0	0.0	0.0	1.6	0.0	0.0	0.0	0.0	0.0	0.0	2.7	0.9	0.0	0.0	4.1	0.0	0.0	0.0	
Sub Total (Zone 4)	22.4	13.7	17.1	1.4	46.7	41.6	83.9	45.4	80.8	76.8	2.9	5.5	8.5	4.3	21.6	5.4	1.7	4.7	32.4	1.6	5.8	7.5	17.0	15.0	0.9	4.1	2.5	0.9	
Sub Total Borough of Broxbourne (Zones 1, 2, 3 and 4)	35.9	25.6	92.1	93.3	97.5	89.6	89.7	88.1	92.9	84.0	24.3	16.2	10.2	6.7	35.3	5.4	1.7	4.7	36.3	26.3	16.4	18.1	35.7	16.2	26.4	27.3	2.5	0.9	

Updated Table 3: Convenience goods shopping patterns cont...

Destination	Total		Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6		Zone 7		Zone 8		Zone 9		Zone 10		Zone 11		Zone 12		Zone 13	
	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)
Zone 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sub Total (Zone 5)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 6																												
Co-op, Sun Street, Waltham Abbey	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Co-op, Upshire Road, Waltham Abbey	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Lidl, Cartersfield Road, Waltham Abbey	0.9	1.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	15.2	24.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco, Sewardstone Road, Waltham Abbey	2.7	1.5	0.0	0.0	0.0	0.0	0.0	0.0	2.9	5.0	0.0	5.0	39.2	14.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sainsbury's, Old Station Road, Loughton	0.4	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.2	7.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 6)	4.0	4.6	0.0	0.0	0.0	0.0	0.0	0.0	2.9	5.0	0.0	5.0	60.6	60.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 7																												
Asda, High Street, Ponders End	0.1	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	6.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco Extra, High Street, Ponders End	5.7	4.2	0.5	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	25.7	31.6	10.2	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 7)	5.8	5.0	0.5	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	26.5	38.5	10.2	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 8																												
Co-op, Lancaster Road, Enfield	0.0	1.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	8.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Lidl, Cecil Road, Enfield	0.7	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	4.0	2.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Marks and Spencer, Enfield Retail Park, Enfield	2.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	9.4	0.0	5.9	2.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Marks and Spencer, Palace Gardens Shopping Centre, Enfield	1.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.6	2.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Morrisons, Colman Parade, Enfield	1.8	0.3	0.0	0.0	0.0	0.0	0.5	0.0	0.9	0.0	0.0	0.0	0.0	0.0	5.0	2.3	5.1	0.0	2.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Morrisons, Southbury Road, Enfield	1.5	1.2	0.0	0.0	0.0	0.7	0.5	0.0	0.5	0.0	0.0	0.0	0.0	0.0	1.2	1.5	6.8	5.0	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sainsbury's, Crown Road, Enfield	5.9	2.1	0.0	0.0	0.0	0.0	3.9	1.8	0.8	0.0	2.2	2.0	0.0	18.1	9.2	15.2	3.6	1.2	4.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco, Savoy Parade, Southbury Road, Enfield	2.9	2.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.0	0.0	0.0	2.2	1.5	14.6	11.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Waitrose, Palace Gardens Shopping Centre, Enfield	1.9	2.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0	10.4	11.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Waitrose, Windmill Hill, Enfield	0.1	1.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.0	0.0	1.1	1.6	0.0	0.0	7.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Local shops, Enfield	2.8	10.8	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	1.4	38.7	14.8	30.6	0.0	1.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 8)	21.1	24.6	0.0	0.0	0.0	0.7	4.9	2.7	2.2	2.6	0.7	2.2	3.1	1.6	38.1	55.9	82.4	86.1	5.9	5.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 9																												
Co-op, Station Road, Cuffley	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sainsbury's, Darkes Lane, Potters Bar	0.3	0.2	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.3	4.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco Express, Station Road, Cuffley	0.0	1.5	0.0	0.0	0.0	0.0	0.0	3.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.9	0.0	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Local shops, Potters Bar	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	0.0	0.0	0.0	0.0	1.2	6.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 9)	0.3	2.7	0.0	0.0	0.0	0.0	0.0	5.1	0.0	0.0	0.0	0.0	0.0	2.7	0.0	0.0	0.0	10.5	46.4	0.0	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 10																												
Marks and Spencer, Fore Street, Hertford	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0	1.7	0.6	2.0	0.0	0.0	0.0
Sainsbury's, Hartham Lane, Hertford	2.9	2.1	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	23.0	12.5	23.2	14.9	3.9	1.8	0.0	0.0	0.0
Tesco, Ware Road, Hertford	4.5	2.3	1.6	0.0	0.0	1.1	0.8	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	37.7	27.4	11.0	0.0	43.0	32.1	0.0	0.0	0.0
Waitrose, Bircherley Green Shopping Centre, Hertford	1.0	1.5	0.7	0.0	1.4	0.0	0.5	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.5	21.1	5.3	2.0	3.3	15.0	0.0	0.0	0.0	0.0
Local shops, Hertford	0.0	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.6	0.0	9.2	0.0	5.3	0.0	0.0	0.0
Sub Total (Zone 10)	8.4	7.4	2.3	0.7	1.4	1.1	1.3	1.4	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	67.2	63.4	39.5	27.8	50.8	56.2	0.0	0.0	0.0
Zone 11																												
Co-op, Bengoe Street, Hertford	0.1	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	6.4	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 11)	0.1	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	6.4	0.0	0.0	0.0	0.0	0.0
Zone 12																												
Co-op, High Street, Stanstead Abbots	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.0	0.0	4.7	0.0	0.0	0.0
Tesco, West Street, Ware	2.6	4.0	1.2	2.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.1	33.2	15.8	10.0	0.0	0.0	0.0
Local shops, Ware	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.5	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 12)	2.6	5.6	1.2	2.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.1	46.7	15.8	14.7	0.0	0.0	0.0
Zone 13																												
Aldi, First Avenue, Harlow	0.6	1.0																										

Updated Table 3: Convenience goods shopping patterns cont...

Destination	Total		Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6		Zone 7		Zone 8		Zone 9		Zone 10		Zone 11		Zone 12		Zone 13			
	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)	Main food (%)	Top-up (%)		
Outside Study Area																														
Outside Study Area, Bishops Stortford																														
Local shops, Bishops Stortford	0.6	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.1	0.0	3.5	2.2
Sub Total (Bishops Stortford)	0.6	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.1	0.0	3.5	2.2
Outside Study Area, Edmonton Green																														
Asda, West Mall, Edmonton Green	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.8	0.0
Sub Total (Edmonton Green)	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.8	0.0
Outside Study Area, Epping																														
Tesco, High Street, Epping	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Epping)	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, Harlow																														
Co-op, High Street, Old Harlow	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9
Tesco, Church Langley Way, Harlow	4.6	3.3	0.9	0.0	0.6	0.0	0.0	0.0	0.0	0.0	8.1	5.0	0.0	0.0	0.0	0.0	0.0	0.0	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	30.9	19.8	
Sub Total (Harlow)	4.6	3.5	0.9	0.0	0.6	0.0	0.0	0.0	0.0	0.0	8.1	5.0	0.0	0.0	0.0	0.0	0.0	0.0	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	30.9	20.7	
Outside Study Area, Hatfield																														
Aldi, Parkhouse Court, Hatfield	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Asda, Town Centre, Hatfield	0.1	0.2	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	2.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Extra, Mount Pleasant, Oldings Corner, Hatfield	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.9	0.0	2.8	1.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Hatfield)	0.3	0.3	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	4.6	1.6	4.0	4.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Outside Study Area, London																														
Local shops, London	0.1	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.0	0.0	2.0	7.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (London)	0.1	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.0	0.0	2.0	7.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, London Colney																														
Local shops, London Colney	0.1	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (London Colney)	0.1	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Outside Study Area, Potters Bar																														
Tesco, Mutton Lane, Potters Bar	1.4	0.6	0.0	0.0	0.0	0.0	0.5	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	35.6	10.8	2.5	1.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Potters Bar)	1.4	0.6	0.0	0.0	0.0	0.0	0.5	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	35.6	10.8	2.5	1.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Outside Study Area, St Albans																														
Local shops, St Albans	0.0	0.1	0.0	0.0	0.0	2.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (St Albans)	0.0	0.1	0.0	0.0	0.0	2.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Outside Study Area, Southgate																														
Asda, Southgate Circus, Chase Side, Southgate	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Southgate)	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Outside Study Area, Stevenage																														
Local shops, Stevenage	0.2	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	1.7	1.8	0.0	0.0	0.0	0.0		
Sub Total (Stevenage)	0.2	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	1.7	1.8	0.0	0.0	0.0	0.0		
Outside Study Area, Welwyn Garden City																														
Marks and Spencer, The Howard Centre, Welwyn Garden City	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Waitrose, Bridge Road, Welwyn Garden City	0.3	0.1	0.0	0.0	0.0	0.0	1.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.2	0.0	1.7	2.1	0.9	0.0	0.0	0.0	0.0	0.0	0.0		
Local shops, Welwyn Garden City	0.0	0.0	0.0	0.0	0.4	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
Sub Total (Welwyn Garden City)	0.3	0.1	0.0	0.0	0.4	0.7	1.9	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	2.2	0.0	2.4	2.1	0.9	0.0	0.0	0.0	0.0	0.0	0.0		
Outside Study Area, Other																														
Other	1.6	3.7	0.0	1.7	0.0	3.7	0.5	1.8	0.0	7.3	0.0	5.4	20.8	20.0	0.0	0.0	0.0	4.3	0.0	9.2	7.7	1.4	0.0	0.0	0.9	1.8	0.0	0.0		
Sub Total (Other)	1.6	3.7	0.0	1.7	0.0	3.7	0.5	1.8	0.0	7.3	0.0	5.4	20.8	20.0	0.0	0.0	0.0	4.3	0.0	9.2	7.7	1.4	0.0	0.0	0.9	1.8	0.0	0.0		
Sub Total Outside of Study Area	11.0	9.3	1.5	1.7	1.0	7.0	4.2	2.7	1.7	8.6	10.6	12.6	23.9	27.0	0.0	0.0	4.8	4.3	47.1	21.6	16.6	9.5	5.7	1.7	4.8	1.8	40.2	22.9		
Total (rounded)	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	

Notes:

- a. Zones based on post code sectors
- b. Market shares for 'main' and 'top-up' shopping derived directly from NEMS Household Survey
- c. Excludes 'don't know/varies', markets and internet sales

Town Centre	
District Centre	
Neighbourhood Centre	
Local Centre	

Updated Table 4: Convenience goods expenditure

Destination	Total		Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6		Zone 7		Zone 8		Zone 9		Zone 10		Zone 11		Zone 12		Zone 13		
	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	
Study Area																													
Zone 1																													
Aldi, Taverners Way, Hoddesdon	21.9	2.7	6.7	1.1	2.5	0.6	0.3	0.2	2.5	0.4	1.9	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.2	0.0	5.9	0.0	1.4	0.2	0.0	0.0	
Asda, High Street, Conduit Lane, Hoddesdon	7.1	1.6	1.5	0.9	2.1	0.2	0.0	0.1	0.4	0.0	0.0	0.0	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	2.5	0.1	0.0	0.0	
Co-op, Stanstead Road, Hoddesdon	0.0	0.5	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Iceland, Brocket Road, Hoddesdon	0.2	0.5	0.2	0.1	0.0	0.3	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Morrisons, Amwell Street, Hoddesdon	23.5	1.5	5.4	0.8	2.4	0.2	0.3	0.2	1.3	0.0	0.5	0.3	0.0	0.0	8.9	0.0	0.0	0.0	0.0	0.0	0.1	0.0	3.3	0.0	1.1	0.0	0.0	0.0	
Sainsbury's, Brewery Road, Hoddesdon	32.2	4.5	12.2	1.4	6.9	0.6	0.9	0.1	1.7	0.1	1.7	0.3	0.8	0.0	0.0	0.0	0.0	0.0	0.8	0.0	1.7	0.4	1.3	0.0	4.1	1.4	0.0	0.0	
Tesco Express, Burford Street, Hoddesdon	0.5	1.3	0.0	1.1	0.0	0.2	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Express, High Street, Hoddesdon	0.0	0.2	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Hoddesdon	0.0	1.4	0.0	1.3	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Zone 1)	85.3	14.1	26.0	7.3	14.0	2.3	1.5	0.7	6.4	0.6	4.2	0.8	0.8	0.0	9.4	0.0	0.0	0.0	1.2	0.0	2.1	0.5	10.6	0.2	9.1	1.8	0.0	0.0	
Zone 2																													
Local shops, Broxbourne	0.3	0.8	0.0	0.0	0.1	0.8	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Wormley	0.0	0.4	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Zone 2)	0.3	1.1	0.0	0.0	0.1	1.1	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Zone 3																													
Co-op, Goff's Lane, Goff's Oak	0.2	1.5	0.0	0.0	0.0	0.0	0.2	1.4	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Express, Hammond Court, Waltham Cross	0.3	2.7	0.0	0.0	0.0	0.0	0.3	1.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Zone 3)	0.5	4.2	0.0	0.0	0.0	0.0	0.5	2.4	0.0	0.1	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Zone 4																													
Co-op, Church Lane, Cheshunt	0.9	1.8	0.0	0.0	0.0	0.1	0.2	0.2	0.7	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Iceland, High Street, Waltham Cross	0.3	0.8	0.0	0.0	0.0	0.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Lidl, High Street, Waltham Cross	7.8	4.0	0.0	0.0	0.0	0.0	2.5	0.1	2.7	0.6	0.0	0.0	1.0	0.0	0.8	0.6	0.0	0.8	0.0	0.0	0.0	0.5	1.9	0.3	0.0	0.0	0.0	0.0	
Marks and Spencer, Brookfield Centre, Cheshunt	4.5	1.7	0.0	0.1	0.4	0.7	2.1	0.1	1.0	0.4	0.1	0.3	0.0	0.0	0.6	0.0	0.0	0.0	0.4	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	
Sainsbury's, The Pavilion High Street, Waltham Cross	15.7	2.2	0.0	0.0	0.0	0.0	0.2	0.1	3.8	1.4	0.0	0.0	1.5	0.4	10.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Express, High Street, Waltham Cross	0.7	0.2	0.0	0.0	0.0	0.0	0.2	0.0	0.5	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Tesco Extra, Brookfield Centre, Cheshunt	92.8	5.0	5.5	0.0	12.1	1.3	19.9	1.5	27.7	1.8	0.4	0.0	1.1	0.0	3.3	0.0	1.5	0.0	9.5	0.0	1.1	0.0	8.6	0.2	0.0	0.0	2.1	0.2	
Tesco Metro, Turners Hill, Cheshunt	10.5	2.9	0.4	0.1	0.5	0.8	3.1	0.6	5.9	1.4	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Cheshunt	0.5	0.8	0.0	0.0	0.0	0.0	0.0	0.3	0.5	0.4	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Waltham Cross	0.5	1.3	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.3	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.5	0.0	0.0	0.3	0.0	0.0	0.0	
Sub Total (Zone 4)	134.3	20.7	5.9	0.1	13.0	3.0	28.3	3.3	42.9	7.9	0.6	0.4	4.2	0.6	14.9	0.8	1.5	1.5	9.9	0.1	1.1	0.3	9.6	2.1	0.3	0.3	2.1	0.2	
Sub Total Borough of Broxbourne (Zones 1, 2, 3 and 4)	220.3	40.2	31.9	7.4	27.1	6.4	30.3	6.3	49.3	8.7	4.9	1.2	5.0	1.0	24.3	0.8	1.5	1.5	11.1	1.5	3.2	0.8	20.1	2.3	9.4	2.1	2.1	0.2	

Updated Table 4: Convenience goods expenditure cont...

Destination	Total		Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6		Zone 7		Zone 8		Zone 9		Zone 10		Zone 11		Zone 12		Zone 13	
	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)
Zone 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sub Total (Zone 5)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 6																												
Co-op, Sun Street, Waltham Abbey	0.0	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Co-op, Upshire Road, Waltham Abbey	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Lidl, Cartersfield Road, Waltham Abbey	7.5	3.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.5	3.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco, Sewardstone Road, Waltham Abbey	20.9	3.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	0.5	0.0	0.4	19.3	2.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sainsbury's, Old Station Road, Loughton	3.1	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.1	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 6)	31.4	9.9	0.0	0.0	0.0	0.0	0.0	0.0	1.5	0.5	0.0	0.4	29.9	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 7																												
Asda, High Street, Ponders End	0.6	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco Extra, High Street, Ponders End	26.9	5.6	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	17.7	4.9	9.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 7)	27.4	6.7	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	18.2	5.9	9.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 8																												
Co-op, Lancaster Road, Enfield	0.0	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Lidl, Cecil Road, Enfield	3.5	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	3.5	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Marks and Spencer, Enfield Retail Park, Enfield	11.8	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	6.5	0.0	5.2	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Marks and Spencer, Palace Gardens Shopping Centre, Enfield	4.9	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.9	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Morrisons, Colman Parade, Enfield	9.4	0.4	0.0	0.0	0.0	0.0	0.2	0.0	0.5	0.0	0.0	0.0	0.0	0.0	3.4	0.4	4.5	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Morrisons, Southbury Road, Enfield	7.9	1.9	0.0	0.0	0.0	0.1	0.2	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.8	0.2	6.0	1.6	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sainsbury's, Crown Road, Enfield	29.0	3.1	0.0	0.0	0.0	0.0	1.3	0.1	0.4	0.0	0.0	0.2	1.0	0.0	12.5	1.4	13.4	1.2	0.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco, Savoy Parade, Southbury Road, Enfield	14.4	4.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	1.5	0.2	12.9	3.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Waitrose, Palace Gardens Shopping Centre, Enfield	9.7	3.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	9.2	3.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Waitrose, Windmill Hill, Enfield	0.5	2.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.5	0.2	0.0	0.0	0.0	2.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Local shops, Enfield	14.0	16.1	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	1.0	6.0	13.1	10.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 8)	105.3	37.9	0.0	0.0	0.0	0.1	1.7	0.2	1.2	0.3	0.1	0.2	1.5	0.2	26.2	8.6	72.8	28.1	1.8	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 9																												
Co-op, Station Road, Cuffley	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sainsbury's, Darkes Lane, Potters Bar	2.8	0.3	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.8	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco Express, Station Road, Cuffley	0.0	2.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Local shops, Potters Bar	0.4	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.4	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 9)	3.2	3.8	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	3.2	2.6	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 10																												
Marks and Spencer, Fore Street, Hertford	0.2	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.2	0.2	0.0	0.0	0.0
Sainsbury's, Hartham Lane, Hertford	19.0	2.8	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.5	0.5	13.1	2.1	1.4	0.1	0.0	0.0
Tesco, Ware Road, Hertford	29.7	3.8	0.6	0.0	0.0	0.1	0.3	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	7.3	1.2	6.2	0.0	15.4	2.5	0.0	0.0
Waitrose, Bircherley Green Shopping Centre, Hertford	6.5	2.3	0.2	0.0	0.4	0.0	0.2	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.9	3.0	0.3	1.2	1.2	0.0	0.0
Local shops, Hertford	0.0	1.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	1.3	0.0	0.4	0.0	0.0	0.0
Sub Total (Zone 10)	55.4	11.2	0.8	0.1	0.4	0.1	0.4	0.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	13.1	2.8	22.3	3.9	18.1	4.3	0.0	0.0	
Zone 11																												
Co-op, Bengoe Street, Hertford	0.5	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.9	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 11)	0.5	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Zone 12																												
Co-op, High Street, Stanstead Abbots	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	0.4	0.0	0.0	0.0
Tesco, West Street, Ware	16.3	5.7	0.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.2	4.7	5.6	0.8	0.0	0.0	0.0
Local shops, Ware	0.0	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.0	0.0	0.0	0.0	0.0
Sub Total (Zone 12)	16.3	7.9	0.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.2	6.6	5.6	1.1	0.0	0.0	
Zone 13																												
Aldi, First Avenue, Harlow	3.7	1.4	0.0	0.0																								

Updated Table 4: Convenience goods expenditure cont..

Destination	Total		Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6		Zone 7		Zone 8		Zone 9		Zone 10		Zone 11		Zone 12		Zone 13		
	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	Main food (£m)	Top-up (£m)	
Outside Study Area																													
Outside Study Area, Bishops Stortford																													
Local shops, Bishops Stortford	3.9	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	2.9	0.4
Sub Total (Bishops Stortford)	3.9	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	2.9	0.4
Outside Study Area, Edmonton Green																													
Asda, West Mall, Edmonton Green	5.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	0.0
Sub Total (Edmonton Green)	5.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	0.0
Outside Study Area, Epping																													
Tesco, High Street, Epping	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Epping)	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, Harlow																													
Co-op, High Street, Old Harlow	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2
Tesco, Church Langley Way, Harlow	28.5	4.3	0.3	0.0	0.2	0.0	0.0	0.0	0.0	0.0	1.6	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	25.7	3.9	
Sub Total (Harlow)	28.5	4.5	0.3	0.0	0.2	0.0	0.0	0.0	0.0	0.0	1.6	0.4	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	25.7	4.1	
Outside Study Area, Hatfield																													
Aldi, Parkhouse Court, Hatfield	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Asda, Town Centre, Hatfield	1.5	0.2	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tesco Extra, Mount Pleasant, Oldings Corner, Hatfield	2.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Hatfield)	2.5	0.3	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.1	0.8	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, London																													
Local shops, London	1.0	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (London)	1.0	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, London Colney																													
Local shops, London Colney	1.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (London Colney)	1.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, Potters Bar																													
Tesco, Mutton Lane, Potters Bar	11.5	0.7	0.0	0.0	0.0	0.0	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.9	0.6	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Potters Bar)	11.5	0.7	0.0	0.0	0.0	0.0	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.9	0.6	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, St Albans																													
Local shops, St Albans	0.0	0.2	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (St Albans)	0.0	0.2	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, Southgate																													
Asda, Southgate Circus, Chase Side, Southgate	4.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub Total (Southgate)	4.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Outside Study Area, Stevenage																													
Local shops, Stevenage	3.6	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	0.2	0.6	0.0	0.0	0.0	0.0	
Sub Total (Stevenage)	3.6	0.2	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.7	0.2	0.6	0.0	0.0	0.0	0.0	
Outside Study Area, Welwyn Garden City																													
Marks and Spence, The Howard Centre, Welwyn Garden City	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Waitrose, Bridge Road, Welwyn Garden City	2.2	0.1	0.0	0.0	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.3	0.1	0.5	0.0	0.0	0.0	0.0	0.0	0.0	
Local shops, Welwyn Garden City	0.2	0.1	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Sub Total (Welwyn Garden City)	2.5	0.1	0.0	0.0	0.1	0.1	0.6	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.0	0.5	0.1	0.5	0.0	0.0	0.0	0.0	0.0	0.0	
Outside Study Area, Other																													
Other	12.2	6.8	0.0	0.1	0.0	0.3	0.2	0.1	0.0	0.8	0.0	0.4	10.3	3.0	0.0	0.0	0.0	1.4	0.0	0.5	1.5	0.1	0.0	0.0	0.3	0.1	0.0	0.0	
Sub Total (Other)	12.2	6.8	0.0	0.1	0.0	0.3	0.2	0.1	0.0	0.8	0.0	0.4	10.3	3.0	0.0	0.0	0.0	1.4	0.0	0.5	1.5	0.1	0.0	0.0	0.3	0.1	0.0	0.0	
Sub Total Outside of Study Area	77.2	14.6	0.5	0.1	0.3	0.5	1.4	0.2	0.9	0.9	2.1	0.9	11.8	4.0	0.0	0.0	4.2	1.4	14.4	1.2	3.2	0.4	3.2	0.2	1.7	0.1	33.4	4.5	
Total	601.1	153.9	34.6	7.9	27.8	7.2	33.8	7.2	53.2	10.3	20.2	7.3	49.3																

Updated Table 5: Survey-derived performance of stores compared to expected benchmark performance at 2014

Destination	Gross Floorspace (sq m)	Net Sales (sq m)	Net Convenience Sales Area (sq m) (A)	Sales Density (£ per sq m) (B)	Benchmark Turnover (£m) (AxB)	Survey Turnover (£m)	Inflow Allowance (%)	Estimated Survey T/O with Inflow (£m)	Overtrading (£m)
Zone 1									
Aldi, Taverners Way, Hoddesdon	1,678	1,165	1,049	11,292	11.8	24.5	0.0	24.5	12.7
Asda, High Street, Conduit Lane, Hoddesdon		858	575	13,350	7.7	8.7	0.0	8.7	1.0
Co-op, Stanstead Road, Hoddesdon		154	134	8,127	1.1	0.5	0.0	0.5	-0.6
Iceland, Brocket Road, Hoddesdon		435	422	6,779	2.9	0.7	0.0	0.7	-2.2
Morrisons, Amwell Street, Hoddesdon	5,410	2,657	2,126	11,546	24.5	25.0	0.0	25.0	0.5
Sainsbury's, Brewery Road, Hoddesdon		4,398	2,639	12,099	31.9	36.6	0.0	36.6	4.7
Tesco Express, Burford Street, Hoddesdon					1.8	1.8	0.0	1.8	0.0
Tesco Express, High Street, Hoddesdon	360	231	219	12,837	2.8	0.2	0.0	0.2	-2.6
Local shops, Hoddesdon					1.4	1.4	0.0	1.4	0.0
Sub Total (Zone 1)					85.9	99.4		99.4	13.4
Zone 2									
Local shops, Broxbourne					1.0	1.0	0.0	1.0	0.0
Local shops, Wormley					0.4	0.4	0.0	0.4	0.0
Sub Total (Zone 2)					1.4	1.4		1.4	0.0
Zone 3									
Co-op, Goff's Lane, Goff's Oak		156	136	8,127	1.1	1.7	0.0	1.7	0.6
Tesco Express, Hammond Court, Waltham Cross	341	218	207	12,837	2.7	3.0	0.0	3.0	0.4
Sub Total (Zone 3)					3.8	4.7		4.7	1.0
Zone 4									
Co-op, Church Lane, Cheshunt		183	159	8,127	1.3	2.6	0.0	2.6	1.4
Iceland, High Street, Waltham Cross		553	537	6,779	3.6	1.1	0.0	1.1	-2.5
Lidl, High Street, Waltham Cross	1,547	1,063	957	3,385	3.2	11.8	0.0	11.8	8.6
Marks and Spencer, Brookfield Centre, Cheshunt	8,770	1,189	1,134	10,694	12.1	6.3	3.0	6.5	-5.7
Sainsbury's, The Pavilion High Street, Waltham Cross	3,143	1,532	1,106	12,099	13.4	17.9	0.0	17.9	4.5
Tesco Express, High Street, Waltham Cross		134	127	12,837	1.6	0.9	0.0	0.9	-0.7
Tesco Extra, Brookfield Centre, Cheshunt	11,722	6,416	3,849	12,837	49.4	97.8	3.0	100.7	51.3
Tesco Metro, Turners Hill, Cheshunt	2,991	1,323	1,002	12,837	12.9	13.4	0.0	13.4	0.5
Local shops, Cheshunt					1.3	1.3	0.0	1.3	0.0
Local shops, Waltham Cross					1.8	1.8	0.0	1.8	0.0
Sub Total (Zone 4)					100.7	155.0		158.1	57.4
Total in Borough of Broxbourne					191.8	260.5		263.6	71.8

Notes:

- Gross floorspace derived from Council database, IGD Database or WYG Assessment
- Net floorspace derived from IGD data where available or based on WYG professional judgement (generally assumed to be 70% of gross floorspace for smaller stores where not specifically known)
- Proportion of net floorspace derived from typical company split between convenience and comparison floorspace as identified by Verdict UK Food & Grocery Retailers 2014 with the exception of large food superstores (i.e. over 4,000 sq.m net sales area) which are assumed to have approximately 60:40 split in favour of convenience goods and local foodstore which are assumed to have 95% of net sales dedicated to convenience.
- Aldi and Lidl are assumed to have 90% of net sales dedicated to convenience goods, which correlates with our experience elsewhere
- Sales densities relate to the monetary turnover of each square metre of net sales area and are derived for all retailers except Lidl and Aldi from Verdict UK Food & Grocery Retailers 2015, and for Lidl and Aldi from information published for these retailers by Verdict and Mintel.
- It has been assumed that all unnamed convenience stores within a centre are 'trading at equilibrium' (i.e. their 'benchmark' turnover equates to that identified by the survey)
- Survey derived performance of stores calculated by adding together 'main' and 'top up' turnover as set out in Updated Table 4

Town Centre
District Centre
Neighbourhood Centre
Local Centre

2012 Prices

Updated Table 6: Estimated (baseline) capacity for new convenience goods provision within study area

Updated Table 6a: Estimated 'capacity' for convenience goods facilities in Borough of Broxbourne

Year	Total Turnover - £m ¹	Borough of Broxbourne Turnover - £m ²	Borough of Broxbourne Inflow - £m	Surplus Expenditure - £m
2015	191.8	260.5	3.1	71.8
2020	190.3	264.3	3.2	77.2
2025	189.9	267.6	3.2	80.9
2030	189.9	271.5	3.3	84.8
Study Area Market Share (%)		34.5		

1. Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 13 (Oct 2015)
2. Assumes constant market share claimed by Borough of Broxbourne facilities at 34.5% from Study Area (allows for no inflow)

2012 prices

Updated Table 6b: Gross quantitative capacity for additional convenience goods floorspace in Borough of Broxbourne

Year	Convenience Goods		
	£m	Floorspace Requirement (sq m net)	
		Min ¹	Max ²
2015	71.8	5,800	7,300
2020	77.2	6,200	7,900
2025	80.9	6,600	8,300
2030	84.8	6,900	8,700

1. Average sales density assumed to be £12,458 per sq.m (rounded) based on the average sales density of the leading four supermarkets as identified by Verdict 2015
2. 50% of residual expenditure assumed to be consumed by leading four supermarkets (£12,458/sq m) and 50% assumed to be consumed by discount operators (£7,339 per sq.m) . This equates to £9,899/sq m
3. Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 13 (Oct 2015)

2012 prices

Updated Table 6c: Net quantitative capacity for additional convenience goods floorspace in Borough of Broxbourne

Year	Convenience Goods				
	Surplus £m	Commitments £m	Residual £m	Floorspace Requirement	
				Min ¹	Max ²
2015	71.8	10.7	61.1	4,900	6,200
2020	77.2	10.6	66.6	5,400	6,800
2025	80.9	10.6	70.3	5,700	7,200
2030	84.8	10.6	74.2	6,000	7,600

1. Average sales density assumed to be £12,458 per sq.m (rounded) based on the average sales density of the leading four supermarkets as identified by Verdict 2015
2. 50% of residual expenditure assumed to be consumed by leading four supermarkets (£12,458/sq m) and 50% assumed to be consumed by discount operators (£7,339 per sq.m) . This equates to £9,899/sq m
3. Residual calculated by subtracting turnover of commitments (sourced from UpdatedTable 6d) from surplus expenditure (sourced from UpdatedTable 6a)
4. Allows for increased turnover efficiency as set out in Table 4a Experian Retail Planner 13 (Oct 2015)

2012 prices

Updated Table 6d: Extant convenience goods commitments in Borough of Broxbourne

Destination	Reference	Proposal	Net Convenience Floorspace (sq.m)	Estimated Sales Density (£/sq.m)	Estimated Convenience Turnover (£m)	Status
Zone 1						
Vacant Snooker Club, Conduit Lane, Hoddesdon, EN11 8EP	07/11/0129/F	1 no 3 storey block comprising, 2 no retail units (A1), 1 no (A1,A2 or A3) unit on ground floor, 14 no 2 bed flats and offices above, with associated basement parking (Renewal of planning permission 7/05/10/05/F/HOD)	505	5,000	2.53	Extant permission
Units A, B, D, E, F & K, Fawkon Walk, Hoddesdon, EN11 8TJ	07/12/0218/F	Change of use from Class A1 to Classes A1, A2, A3 and D1 and new shop fronts.	127	5,000	0.64	Extant permission
Woodside Units, Brewery Road, Hoddesdon, EN11 8HF	07/13/0874/F	Demolition of existing commercial units and construction of new building consisting of 2 no. ground floor commercial units for Class A1, A2 or A3 use and 14 no. two bedroom flats above with undercroft parking and roof terraces	167	5,000	0.84	Extant permission
110-114 High Street, Hoddesdon, EN11 8HD	07/12/0153/F	Redevelopment to provide A1 use on ground floor, a two storey entrance and first floor A3 use. Residential redevelopment providing 4 no. one bed and 9 no. two bed flats with parking and amenity area (Refer conservation area consent 07/12/0882/CA)	140	5,000	0.70	Extant permission
Aldi Foodstore Ltd, Taverners Way, Hoddesdon. EN11 8TJ	07/13/0858/F	Side extension with associated car parking space alteration, landscaping & external alterations	303	6,616	2.00	Extant permission
Social Club, 76 High Street, Hoddesdon, EN11 8ET	07/12/0805/F	Restoration, alteration and conversion of existing social club building to form a bar and restaurant building (A3/A4) with 2x1 bed units, erection of a new social club building including ancillary offices and erection of a 3/4 storey building containing 22 one bed and 18 two bed units with associated parking and amenity works (Renewal of planning permission 7/0910/08/LB/HOD, refer listed buildings application 07/12/0806/LB))	131	5,000	0.65	Extant permission

Updated Table 6d: Extant convenience goods commitments in Borough of Broxbourne cont...

Destination	Reference	Proposal	Net Convenience Floorspace (sq.m)	Estimated Sales Density (£/sq.m)	Estimated Convenience Turnover (£m)	Status
Zone 2						0.00
Ground floor, Bridge House, 55 - 59 High Road, Broxbourne, EN10 7HX	07/13/0902/F	Redevelopment to provide A1 use on ground floor, a two storey entrance and first floor A3 use. Residential redevelopment providing 4 no. one bed and 9 no. two bed flats with parking and amenity area (Refer conservation area consent 07/12/0882/CA)	143	5,000	0.72	Extant permission
Zone 4						0.00
Land adjacent to Unit 6, Brookfield Retail Park, Halfhide Lane, Cheshunt, EN8 0QE	07/14/0007/F	Side extension to existing unit 6 to create two new retail units for flexible Use Class A1, A2 and A3 use, external seating area, works to reconfigure car park and other associated works (Re-submission 07/12/0778/F)	103	5,000	0.52	Extant permission
88-90 Turners Hill, Cheshunt, EN8 8LQ	07/11/0970/F	The alteration and extension of ground floor retail space to form seven retail units and the conversion of first floor office space and construction of first and second floor extensions in roof space and to the rear to create 12 residential units (Renewal of planning permission 7/0423/08/F/WOL)	155	5,000	0.78	Extant permission
Cheshunt and Waltham Cross Conservative Club, Eleanor Cross Road, Waltham Cross, EN8 7LF	07/11/0258/F	Demolition of existing building and construction of a new eight storey building, comprising retail unit (A1) on ground and part first floor, car parking on ground floor, Conservative Club on first floor and 60 no residential units above on six floors (Renewal of planning permission 7/0233/08/F/WX)	268	5,000	1.34	Extant permission
TOTAL			2,043		10.7	

1. Sales density assumed to be £5,000 based on WYG judgement where the occupier has not been referenced within the application.

2. Convenience floorspace is assumed to be 1/3 net sales area based on WYG judgement where the occupier has not been referenced within the application.

2012 prices

Appendix VIII

Planning Appeal Decisions at High Street, Waltham Cross Town Centre (April 2019 and October 2020)

- Appeal Ref. PP/W1905/W/18/3213919 (May 2019)
- Appeal Ref. APP/W1905/W/19/3243274 (October 2020)



Appeal Decision

Site visit made on 1 April 2019

by **H Miles BA(hons), MA, MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 7 May 2019

Appeal Ref: APP/W1905/W/18/3213919

143-145 High Street, Waltham Cross EN8 7AP

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Kirkland on behalf of Portland Place Ltd against the decision of Broxbourne Borough Council.
 - The application Ref 07/18/0010/F, dated 17 November 2017, was refused by notice dated 1 June 2018.
 - The development proposed is change of use of part ground and first floor from A3 use to 9no flats, 2no ground floor A1 retail units and alterations to add windows/door.
-

Decision

1. The appeal is dismissed.

Procedural Matters

2. The examination into the Draft Broxbourne Local Plan 2018-2033 is ongoing, and I understand that the Inspectors report has not been published. As such I am not certain that these policies will be adopted in the form that they are put to me, and therefore I do not afford full weight to these policies.
3. Following the submission of the application that led to this appeal, a new version of the National Planning Policy Framework (the 2018 Framework) has been published. The main parties had the opportunity to make comments on the bearing of this on the appeal. Whilst there have been further revisions to the Framework contained in the new version published in February 2019 (the revised Framework), no changes have been made to the content directly relevant to the main issues of this appeal. Consequently, I consider that no prejudice would occur to any parties as a result of me taking the revised Framework into account in my assessment.
4. I have sought clarification in relation to the name of the appellant. It has been confirmed that Mr Hayward (the applicant) and Mr Kirkland are both employed by Portland Place Ltd and Mr Hayward gives permission for Mr Kirkland to be the appellant.

Main Issues

5. The main issues are the quality of the living conditions for future occupiers in terms of outlook and provision of outside space, and the effect of the proposed development on the development of Waltham Cross Northern High Street.

Reasons

Living Conditions

6. Policy H8 of the Local Plan¹ seeks to ensure a good quality of residential development. The SPG² provides further detail to this policy including, in part, that there should be a reasonable outlook from the main windows of a habitable room. In relation to outside space, amongst other things, the SPG states that *'new residential development is [required to be] provided with suitable outside amenity space'*.
7. There is no outlook from one of the bedrooms in both flat 1 and flat 6, with the only external opening being a rooflight. This would effectively no outlook within these rooms and consequently an unacceptable sense of enclosure. This would result in inadequate living conditions for future occupiers. Policy H8 states that consideration may be given to relaxation of the SPG standards for development within the defined town centres. However, given these rooms have such poor outlook, it would not be appropriate to relax the standards to this extent in these particular circumstances.
8. The development does not propose any communal garden areas or shared landscaped areas and six of the flats would not have access to any private outside amenity space. However, a separate area for bins and cycles is proposed and, given their surroundings and as the units without outside space are on the upper floor, amenity space is not required to provide privacy. Therefore based on the evidence before me I am not persuaded that the lack of private outside space would result in unacceptably harmful living conditions for future occupiers in this case.
9. From the evidence presented I understand that the proposed development meets all national and Council internal space standards for amenity, including those set out in the nationally described space standard³. Although the flats would be suitably sized for single person accommodation only, I am not persuaded that this in itself would result in poor quality living conditions.
10. Whilst I do not find harm in relation to the provision of outside space, this does not outweigh the harm identified above in relation to inadequate outlook. Consequently, for the reasons above, the proposed development would provide unacceptable living conditions for future occupiers. Therefore, in these respects, the proposed development would be contrary to the policy most relevant to this main issue: H8 of the Local Plan, and to the advice in the SPG.
11. The Council refers to Policy HD16 of the Local Plan in its reason for refusal. However, in the main this policy refers to design and amenities of existing residents, rather than living conditions of future occupiers. Also, for the reasons set out above, I do not find that the proposed development is contrary to the nationally described space standard. Therefore I find the policy set out above more relevant to this main issue.

¹ Local Plan Second Review 2001-2011 Written Statement December 2005 (the Local Plan)

² Borough Wide Supplementary Planning Guidance To be read in conjunction with the Borough of Broxbourne Local Plan Second Review Second Deposit 2001-2011 Adopted August 2004 (updated 2013) (the SPG)

³ Department for Communities and Local Government Technical housing standards – nationally described space standard March 2015 (the nationally described space standard)

Waltham Cross Northern High Street

12. In summary, Policies WC1 and WC2 of the Draft Local Plan⁴ allocate an area including the appeal site for mixed use development as part of the Waltham Cross Town Centre Strategy. However, these policies are in draft form and, based on the evidence before me now, and for the reasons set out in the Procedural Matters section I afford these policies limited weight.
13. I note the aspirations for this area in the advice in the town centre strategy⁵ which envisages public realm improvements including reopening the road to traffic, and mixed use development at this end of the High Street. I also understand discussions are ongoing between the Council and landowners in relation to this site. However, I have not been presented with any site specific proposals. As such, based on the submitted evidence, I am not persuaded that the proposed development would compromise the wider aims relative to this site. Nor that the proposed changes to the existing building would be so substantial that the proposed development would predetermine decision about the scale, location or phasing of the development of Waltham Cross Northern High Street. As such its stated prematurity would not justify a refusal of planning permission.
14. Consequently, in this respect, the proposed development would not be contrary to the adopted Development Plan and I am not persuaded that permission should be otherwise refused in relation to this issue.

Other Matters

15. I recognise the economic, social and environmental benefits of the proposed development including that it would make use of an under utilised building and would provide nine housing units. However these benefits are modest in their scale given the size of the development proposed and generally are not unique to this particular development.
16. It has been suggested that the Council cannot demonstrate a 5 year housing land supply. The harm in relation to the inadequate living conditions of future occupiers would significantly and demonstrably outweigh the benefits of the proposed development as discussed above. Consequently, the appeal scheme is not sustainable development in the terms of the revised Framework for which there is a presumption in favour of.
17. I note that the principal of the proposed uses is not in dispute between the main parties, however, the lack of harm in this regard is a neutral factor which does not weigh strongly in favour of the development.

⁴ Broxbourne Local Plan: A Framework for the Future Development of the Borough Pre-submission Consultation November-December 2017 (Regulation 19 Draft Local Plan Consultation Document) and the Local Plan Examination in Public Draft Schedule of Main Modifications as at 23 November 2018 (the Draft Local Plan)

⁵ Waltham Cross Town Centre Strategy Adopted March 2015 (the Town Centre Strategy)

Conclusion

18. Whilst I do not find harm in relation to the development of Waltham Cross Northern High Street or any other matters, this does not outweigh my finding in respect of the unacceptability of the living conditions for future occupiers.
19. For the reasons above, this appeal is dismissed.

H Miles

INSPECTOR



Appeal Decision

Site visit made on 12 October 2020

by M Chalk BSc (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 27 October 2020

Appeal Ref: APP/W1905/W/19/3243274
133 High Street, Waltham Cross EN8 7AP

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Gokmen Kerey of GIB Property Invested Limited against the decision of Broxbourne Borough Council.
 - The application Ref 07/19/0675/F, dated 2 August 2019, was refused by notice dated 23 September 2019.
 - The development proposed is described as "conversion of A1 storage to C3, in order to create 1no. one bedroom flat and 1no. studio flat".
-

Decision

1. The appeal is dismissed.

Procedural Matter

2. Both parties have commented on the Council's emerging Local Plan. The emerging Plan is at a relatively advanced stage with the hearings having been completed. Accordingly, the policies in the emerging Plan attract significant weight.

Main Issues

3. The main issues are:
 - Whether the development proposed would provide acceptable living conditions for future occupiers,
 - Whether it would be piecemeal development; and,
 - Whether it would make adequate provision for the storage of refuse, including the effect on the character and appearance of the area.

Reasons

Living conditions

4. Internal illumination of the proposed studio flat would be provided by two windows in the north elevation of the building. Due to their orientation these windows would provide limited natural light to the occupiers, and the kitchen area would be dependent on borrowed light. This would result in the interior of the studio flat being underlit and gloomy, dependent on artificial illumination and offering a poor standard of accommodation to future occupiers.

5. For both flats the sole or principal outlook would be across the yard to the rear of the terrace and the neighbouring car park. In an urban area this is a not uncommon outlook, particularly for accommodation above commercial properties. While not an attractive outlook, these would be lengthy and largely unobstructed views that would include trees in the distance. Given these considerations, the standard of outlook from the flats would be acceptable.
6. The development proposed would therefore not provide acceptable living conditions for future occupiers due to the lack of natural light to the studio flat. It would conflict with policies H8 and HD16 of the Broxbourne Local Plan 2005 (the LP). These policies seek, amongst other things, to ensure good quality of residential development.

Whether piecemeal development

7. The appeal site falls within an area of Waltham Cross identified in the emerging Local Plan (the ELP) for future mixed-use development to promote the vitality of the northern High Street. Policies WC1 and WC2 of the ELP set out the intentions for the area, and ELP Policy DSC7 states that the Council will resist piecemeal development that does not accord with agreed master plans.
8. The National Planning Policy Framework advises that refusal of a planning permission in such circumstances is unlikely to be justified unless the development proposed is so substantial that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan.
9. The appeal site is an existing mixed-use property comprising retail on the ground floor and two approved flats in the front half of the first floor. The development proposed would relate only to this single property, and no substantial building works are proposed to the building to deliver the appeal proposal. No evidence has been submitted to show that there is an agreed master plan for the area. The appeal development would not therefore be piecemeal development nor so substantial that to grant permission would undermine the plan-making process.

Storage of refuse

10. Both parties consider that details of an acceptable size and siting for the refuse bin store could be secured by an appropriately worded condition, if permission were to be granted. The appellant owns the yard to the rear of Nos 133-137, and there is no reason to think that an appropriate location could not be found within the yard to accommodate the store if I were minded to allow this appeal.

Other Matters

11. Outdoor amenity space would be provided at the rear of the building. This would be sited beyond the parking area and next to the car park on the neighbouring site. As shown on the submitted plans there would be no screening for users of the green space. Because of the lack of privacy and proximity to moving vehicles this space would offer little amenity value to occupiers of the flats.
12. The development would provide two new units of market housing and deliver short-term economic benefits from their construction and ongoing economic

and social benefits from their occupation. The appeal site is in a built-up area with access to services and facilities as well as public transport. These benefits are acknowledged, but they do not outweigh the harm that would result from the creation of accommodation of poor quality.

Conclusion

13. For the reasons set out above, the appeal fails.

M Chalk

INSPECTOR

Appendix IX

Main Modifications to Policy WC2 and Homebase Ltd
Representations (Broxbourne Local Plan Examination)

Date: 1st October 2018

Update of Representations by HHGL Ltd to Broxbourne Pre-Submission Local Plan

Our original representations were submitted on behalf of HHGL Ltd, which at the time was the trading name of Bunnings Warehouse (Bunnings) in the UK & Ireland. These representations were set out on the Council's Comment Form and dated the 19th December 2017.

The following has occurred since then:

- Bunnings sold the business to Hilco Capital Ltd in May 2018 after their (Bunnings) unsuccessful attempts to rebrand Homebase as Bunnings Warehouse in the UK & Ireland
- Hilco Capital acquired the business with the specific aim of reinvigorating the Homebase brand through a return to its traditional retail roots
- HHGL Ltd is now the trading name of Homebase within the UK & Ireland
- A Company Voluntary Agreement (CVA) was approved by creditors on the 31st August 2018 that will see the closure of 42 existing Homebase stores and the restructuring of other Leases

Within the CVA, the Waltham Cross Homebase store is categorised as a store that the business wishes to retain, as it is a profitable.

In relation to Policies WC1 & WC2 and paragraph 11.4 of the Pre-Submission Plan, Bunnings position in December 2017 was that it was actively seeking a new store on the Park Plaza North site and was in discussion with the owners of that site to provide a modern Bunnings Warehouse of 4,645 square metres (50,000 square feet) (main building – store), which would release the existing store on Sturlas Way, Waltham Cross, for redevelopment.

That position has now changed in that:

- Homebase wish to retain their representation (store) on the Sturlas Way site and will be seeking to renew their Lease
- Homebase are not in discussions with the owners of Park Plaza North or the owners of any other alternative site and will not be seeking a new replacement store
- Homebase's strategy moving forward is to reinvigorate and successfully relaunch the business by returning all its stores to profitability
- Homebase's strategy will concentrate on the stores it retains following the CVA and it will not be seeking to acquire new stores or replacement stores
- Hilco Capital will be looking to invest £125.0Million as part of this relaunch
- Homebase no longer supports the principle of Policy WC2 insofar as this relates to its Sturlas Way store

**Council Responses to Actions Required following Hearing Sessions for
Matter 6 (Week Three)**

Issues 6.13: Waltham Cross and Hoddesdon

AP30. Council to propose a main modification to policy WC2, paragraph 11.4 and Figure 13 to ensure that the Plan provides an effective and justified approach to the redevelopment of Waltham Cross northern High Street and the relocation of any existing uses that may be required.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
11.4	<p>The northern end of High Street the High Street presently sees relatively low levels of footfall and has a level of vacancy significantly higher than the southern end. Whilst the ‘big box’ Wickes (<u>east of Sturlas Way</u>) and Homebase DIY stores (<u>west of Sturlas Way</u>) at this end of the High Street play a recognised role in the broad retail offer of the town, they turn their back on this end of the street and create closure to the pedestrianised core, consequently limiting footfall and the viability of the retail units. Previous endeavours to redevelop the northern end of the High Street for a retail led development have not attracted investors. The Town Centre Strategy therefore now promotes this site for a mixed use, high density development of apartments, shops and community uses. The estimated capacity for the site is for 300 new homes. This would entail the relocation of Wickes, and Homebase to Park Plaza and negotiations are on-going with both companies towards this end.</p>	
New paragraph 11.5	<p>The estimated capacity of the eastern part of the site is for 150 new homes. This would entail the relocation of Wickes, potentially to Park Plaza North (see Policy PP2). The western part of the allocation comprises the Homebase store and negotiations will take place with both the landowner and Homebase to establish the most sustainable future for this site. That may result in the status quo, a redevelopment incorporating a re-modelled Homebase store or the closure of the Homebase store and its potential relocation.</p>	
Policy WC2: Waltham Cross Northern High Street	<p>Policy WC2: Waltham Cross Northern High Street Waltham Cross Northern High Street will be developed as a mixed use quarter as follows <u>comprising the following:</u></p> <ul style="list-style-type: none"> 1. c. 300+ new homes; 2. 40% affordable housing; 3. Shops/commercial/community ground floor uses. <p style="margin-left: 40px;">a) <u>On the land east of Sturlas Way, approximately 150 homes;</u></p>	

Council Responses to Actions Required following Hearing Sessions for Matter 6 (Week Three)

	<p>b) <u>On the land west of Sturlas Way, the potential for significant housing development, possibly as part of a mixed use development incorporating the existing store;</u></p> <p>c) <u>40% affordable housing;</u></p> <p>d) <u>Shops/commercial/community ground floor uses.</u></p> <p>The site is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted.</p> <p><u>Masterplanning is to consider reasonable options for the relocation of the Wickes and Homebase stores.</u></p> <p>A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan.</p> <p>If necessary, compulsory purchase will be pursued by the Council.</p>	
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Representations from the agents for the freeholders of the Homebase site are attached as an appendix. These state that *"They [LCP Investments Ltd] remain unconvinced that Homebase represents a viable option on this site. They support in principle the proposal in the Local Plan to redevelop the site and would work with the Council to consider a mixed use redevelopment of the site."* The Council considers that it is appropriate to retain the Homebase site within the site allocation, but reduce the number of dwellings proposed to 150 to reflect development of the land east of Sturlas Way only, in order to provide flexibility around the future of the Homebase site.

In relation to Figure 13, this means that the only modification required is to delete the reference to 'c. 300 dwellings' and instead label "c.150 dwellings" on the eastern part of the site only. No modifications to the Policies Map are required.



Broxbourne Adults Strategic Supported Accommodation Board
Tuesday 2 October 2018 at 10.00 am
Committee Room

<p><u>Broxbourne Borough Council:</u></p> <p>Stephen Tingley – Head of Housing Douglas Cooper – Head of Planning</p> <p><u>B3 Living:</u></p> <p>Deborah Fenton – Head of Housing</p>	<p><u>Hertfordshire County Council:</u></p> <p>Chris Badger – Deputy Director, Adult Care Services Kristian Tizzard</p>
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1. MINUTES OF PREVIOUS MEETING HELD ON 4 JULY 2018

Agreed

2. UPDATE INCLUDING WORMLEY SCHEME

HCC to resolve care provider contract prior to construction - pre market engagement to this end is now completed.

Full tender out by Christmas and the aim is synchronize this process with the development process to afford the contractor the opportunity to influence the design process. Aim to be on site from 4/19

30 year contract with break clause is envisaged.

CB suggested engagement with local Broxbourne members including Paul Seeby as portfolio holder.

It was asked whether the New Grange Care Home likely to be rebuilt following the fire DC has subsequently confirmed that the care home is being re-provided in its current location

DF indicated that Kingfisher would cease to be providing the care contract at Emmanuel Lodge in Cheshunt.

There may be an opportunity to remodel the facility although there may be a covenant mandating care/health provision at the site which could limit options?

ST noted that if the covenant was in favour of the Council that there might be a case to waive it if this was legally possible and use in line with the wishes and agreement of the Board could be brought forward.

3. EASTERN PLAYING FIELDS UPDATE

Action

ST to advise

ACS still looking to promote the site as affordable supported accommodation scheme for the elderly using a model to be determined – subject to the business case and they hope to present this within the next month or so.

HCC property team indicated that they wanted to retain the option of a mainstream market housing scheme to generate a capital receipt as an alternative option.

DC indicated that the Local Plan was at examination, with all of the work that that entailed. As part of that process this site had been designated for care usage. The Council would robustly oppose any proposal for alternative usage in planning terms.

ST also expressed the view that this approach was not entirely helpful in fostering the partnership approach this Board was seeking to engender.

SBC are developing an OAP housing strategy with HCC and the NHS.

4. DELIVERY PROGRAMME

KT seeking to develop a shared vision for supported housing between HCC and the district Council's with the frame of reference at District Council level not countywide

Early discussions would be critical to the success of the approach.

KT and ST to meet and initially to scope a possible future programme.

5. DATE OF NEXT MEETING: Monday 14th January 2019 at 2:00 pm

Representations by LCP Investments Limited
in respect of
The Broxbourne Pre Submission Local Plan

1. D2 Planning Limited have been instructed by LCP Investments Limited (LCP) who are the freehold owners of the Homebase store at Sturlas Way, Waltham Cross. Initial representations were submitted in respect of the Pre Submission Broxbourne District Local Plan. We are aware of the recent representations submitted on behalf of HHGL Limited.
2. Since the original representations were submitted, the position surrounding Bunnings who owned Homebase has been well documented.
3. LCP want to make it clear to the Inspector that they do not accept the statement submitted by HHGL Limited on 1st October 2018. They remain unconvinced that Homebase represents a viable option on this site. They support in principle the proposal in the Local Plan to redevelop the site and would work with the Council to consider a mixed use redevelopment of the site.
4. We trust that these comments will be considered by the Inspector.

Appendix X

Strategic Housing Land Availability Assessment (2017) -
Site Specific Appraisal (Ref. WX-U-13)

Waltham Cross

Urban Sites



Site Information		Site Location Map			
Site Reference Number	WX-U-13				
Site Name	Land off Sturlas Way				
Site Area	2.94 hectares				
Site Status	<input checked="" type="checkbox"/> Urban <input type="checkbox"/> Green Belt <input type="checkbox"/> Mixed				
Source of Site	<input type="checkbox"/> Call for Sites <input type="checkbox"/> Planning Application <input checked="" type="checkbox"/> Desktop Study				
Site Visit Carried Out	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Site Ownership	There are various landowners for this site.				
Surrounding Uses	N	Winston Churchill Way			
	E	Monarchs Way, Residential			
	S	Waltham Cross Town Centre, Residential			
	W	Residential			
Site Description					
The site is irregular in shape and relatively flat. It consists of a number of buildings, of varying heights, and areas of hardstanding. The two largest structures (Homebase and Wickes) are located in the north eastern region and the centrally in the eastern region.					
Planning History					
There have been various planning applications for this site. These planning applications range from alterations to existing buildings, advertisement consent and the use of car park as open air market.					
Development Proposal					
Residential	<input checked="" type="checkbox"/>	Commercial	<input checked="" type="checkbox"/>	Other	<input type="checkbox"/>
Local Plan 2005 (Policy H11)					
Submitted Proposal	300				
Site Designations					
	Contains	Adjoins		Contains	Adjoins
Green Belt	<input type="checkbox"/>	<input type="checkbox"/>	Site of Scientific Interest (SSSI)	<input type="checkbox"/>	<input type="checkbox"/>
Archaeological Interest	<input type="checkbox"/>	<input type="checkbox"/>	Ancient Monument	<input type="checkbox"/>	<input type="checkbox"/>
Local Wildlife Site	<input type="checkbox"/>	<input type="checkbox"/>	Community Open Space	<input type="checkbox"/>	<input type="checkbox"/>
Lee Valley Regional Park	<input type="checkbox"/>	<input type="checkbox"/>	Cheshunt Common	<input type="checkbox"/>	<input type="checkbox"/>
Listed Building	<input type="checkbox"/>	<input type="checkbox"/>	Locally Listed Building	<input type="checkbox"/>	<input type="checkbox"/>
TPO Trees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Conservation Area	<input type="checkbox"/>	<input type="checkbox"/>
Air Quality Management Area	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Protected Species	<input type="checkbox"/>	<input type="checkbox"/>
Draft Local Plan Designation (Regulation 18)					
The site was proposed to be allocated for mixed use development as part of Policy WC2. Emerging Policy WC2 identified that the site could to accommodate 300 new homes, with shops/commercial/community ground floor uses.					

Accessibility – distance as the crow flies		
120m-Primary School (Four Swannes)	1.14km - Secondary School (St Mary's)	470m–Employment Area (News International)
220 - Green Space (Kings Road/Cornwall Close)	80m-Healthcare Centre (Stanhope)	12.27km- Hospital (with A&E) (Princess Alexandra)
0m- Town/District Centre (Waltham Cross)	110m - Local Centre (228-256 High Street)	1.31km -Leisure Centre (Laura Trott)
580m- A10 Junction (Lieutenant Ellis Way)	310m - Railway Station (Theobalds Grove)	200m- Bus Service (Waltham Cross Bus Station)
Flood Risk		
Does the site	Contains	Adjoins
Zone 2 (Medium Risk)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Zone 3a (High Risk)	<input type="checkbox"/>	<input type="checkbox"/>
Zone 3b (Active Flood Plain)	<input type="checkbox"/>	<input type="checkbox"/>
Additional Flood Risk Comments		
Part of the eastern region of the site lies within Flood Zone 2. A flood risk assessment will need to accompany any planning application for this site and appropriate mitigation schemes implemented.		
Access and Transport Comments		
The majority of the site can be accessed from Sturlas Way. Due to the amount of development this site can accommodate, a transport assessment will be required. Consideration will need to be given to part of the sites location within an Air Quality Management Area. There are footpaths on both sides of Sturlas Way. Connections to these footpaths will be required. Increasing the sites accessibility to the shops within the other area of the town centre is desirable. Cycle access to the site will need to be provided.		
Utility Provision		
Electricity	Connections available in the urban area.	
Gas	Part of the site is connected to a low pressure gas main. A low pressure gas main is located along Sturlas Way, but stops at the entrance to Ruthven Avenue.	
Water	A water main is located along Park Lane and High Street. Part of the northern region of the site contains a water main. There are water hydrants located in close proximity to the site northern and eastern boundaries.	
Sewerage	A pressure main is located within the northern region of the site. Just to the south of this pressure main (by 25m) is a surface sewer. A foul sewer is located along High Street and Park Lane.	
Sewerage Treatment	<input type="checkbox"/> Rye Meads	<input checked="" type="checkbox"/> Deephams
		<input type="checkbox"/> Other
Additional Developer Comments submitted during Call for Sites 2016		
None submitted.		
Suitability Comments		
<p>The site is considered to be suitable for development due to the following reasons:</p> <ul style="list-style-type: none"> The site is previously developed land, located within an existing settlement boundary. The re-use of previously developed land is one of the 12 core land-use planning principles that underpin plan-making and decision-making. 		

	<ul style="list-style-type: none"> • The site is considered to be in a sustainable location for development – it is close to local facilities, modes of sustainable transport. It is also within the sustainable distance recommended by Barton et al (2010) for a leisure centre, local park/green space and a doctor’s surgery. • As identified in the Waltham Cross Town Centre Strategy, the northern end of the High Street presently sees low levels of footfall and has a level of vacancy significantly higher than the southern end. The retail units within this area turn are seen as ‘turning their back’ on this end of the street and creating closure to the pedestrianized core, consequently limiting footfall and the viability of the retail units. The redevelopment of this area for mixed use of high density development of apartments, shops and community uses, would help to create a lively and more balanced town centre, make the units viable and improve the centres public realm. • The NPPF (Paragraph 23) states that “<i>residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites</i>”.
Is this site considered to be suitable for development?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Availability Comments	The Council is working with Homebase and Wickes on their relocation. The Council has indicated in their emerging Policy that if necessary, compulsory purchase will be pursued to deliver this scheme. However, as a result of this, it is considered that the site will not come forward until the end of the Plan period.
Is the site considered to be available for development	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Achievability Comments	The site is considered to be achievable. There are no planning constraints that would prevent this site from coming forward for development. The amount of development this site could accommodate will support the works required to make this development achievable and economically viable.
Is the site considered to be achievable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Delivery Period	11-15 years

Appendix XI

Proposed Site Layout Plan 2924-COR-111F

WINSTON CHURCHILL WAY A121



SUBJECT TO SITE SURVEY, CONFIRMATION OF LEGAL BOUNDARIES, SITE CONSTRAINTS & HIGHWAYS

THE HARRIS GROUP LTD DOES NOT ACCEPT LIABILITY FOR ANY DEVIATION FROM OUR DRAWINGS OR SPECIFICATION

EXTERNALS:
SITE AREA (RED LINE) 12,159 SQ.M; 3.005 ACRES; 1.217 HECTARES

155 SHARED CUSTOMER SPACES INC 8 DDA, 8 PC & 4 C+C; 4 ACTIVE EVCP & 16 PASSIVE EVCP; 5 MOTOR CYCLE SPACES; 18 CUSTOMER CYCLE SPACES; 10 STAFF CYCLE SPACES

EXISTING PROPOSED PARKING BAYS 3,520 SQ.M (GEA) 3,596 SQ.M (GEA)
PARKING AISLES 2.5M X 5.0M VARIES MIN 6M

ALDI FOOD STORE:
PROPOSED RETAIL AREA 1,756 SQ.M (GIA)
WAREHOUSE 1,262 SQ.M (GIA)
WELFARE 337 SQ.M (GIA)
EXTERNAL LOBBY 120 SQ.M (GIA)
INTERNAL WALLS 29 SQ.M (GIA)
RETAIL AREA 8 SQ.M (GIA)
WAREHOUSE 23.9M X 52.7M 7M

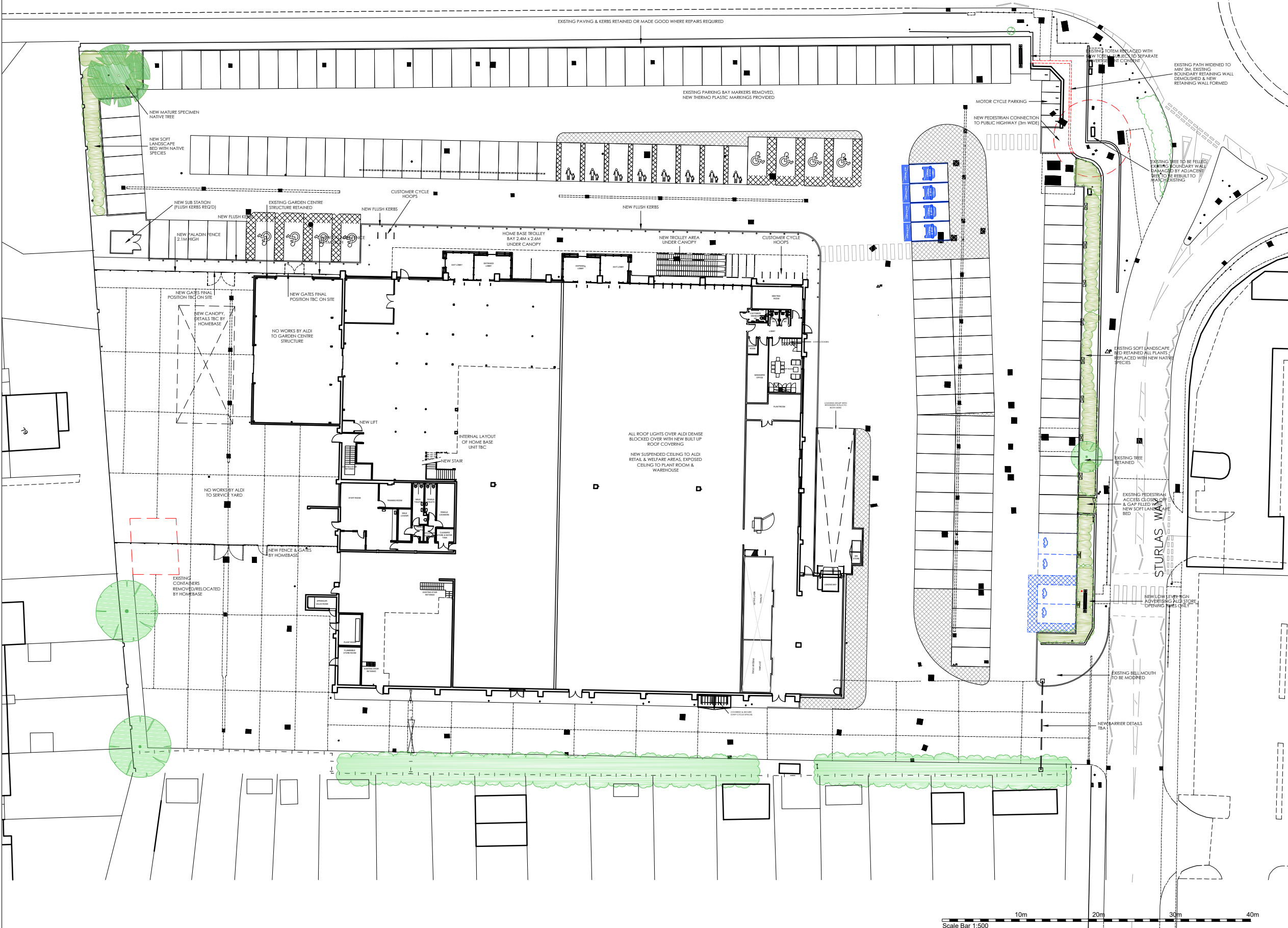
HOME BASE:
PROPOSED GROUND INC GARDEN CENTRE STRUCTURE 2,371 SQ.M (GIA)
EXTERNAL LOBBY MEZZ 1,706 SQ.M (GIA)
29 SQ.M (GIA)
436 SQ.M (GIA)

Rev	Date	Description	Rev By	Chk'd By
F	12.01.22	ALIGNMENT OF BOUNDARY WALL IN NORTH EAST CORNER SPLAYED	JPG	---
E	30.09.21	PEDESTRIAN ROUTES INTO THE SITE. REV'D, ANNOTATION ADDED RE STAFF SHOWERS, LOCKERS, STAFF CYCLE SPACES ADDED	JPG	---
D	15.04.21	NUMBER OF CYCLES SPACES INCREASED	JPG	---
C	01.04.21	EMPLOYEE SHOWER RMS ADDED	JPG	---
B	19.03.21	EXTENDED TOPG ADDED	JPG	---
A	26.02.21	LAYOUT UPDATED TO AFL DRAWINGS & TO INCLUDE MEASURES IN RESPONSE TO HIGHWAY AUTHORITY COMMENTS	JPG	---



Project Title	PROPOSED ALDI FOOD STORE AND HOMEBASE UNIT EXISTING HOME BASE UNIT STURLAS WAY WATHAM CROSS EN8 7BF		
Client	ALDI STORES LIMITED - CORPORATE		
Status	PLANNING		
Scale	1:500	Drawing Size	A3
Date	14.09.20	Drawn By	JPG
		Checked	---
Drawing Title	PROPOSED SITE PLAN		
Job-Dwg No	2924-COR-111	Rev	F

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- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555
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