

Strategic Planning and Design  
Enfield Council  
FREEPOST  
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13 September 2021

Dear Sir/Madam,

## **REPRESENTATIONS TO THE ENFIELD DRAFT LOCAL PLAN (REGULATION 18) CONSULTATION**

On behalf of our client, Sainsbury's Supermarkets Ltd (SSL), we make this submission in response to the current consultation in respect of the draft Local Plan (Regulation 18).

Sainsbury's occupy two large stores in Enfield: on Crown Road; and Green Lanes. Both of these have been allocated within the draft Local Plan for redevelopment (Site Allocations SA8 and SA32). Whilst we support the redevelopment aspirations to provide housing, both SA8 and SA32 lacks clarity as to whether the existing Sainsbury's stores will be re-provided.

The existing Sainsbury's stores are essential for the vitality and viability of Crown Road and Green Lanes. Sainsbury's Supermarkets Ltd are a major employer and the loss of the Sainsbury's stores would have a significant negative impact on Sainsbury's business, the colleagues currently employed on site and the local community who rely on Sainsbury's for their grocery shopping.

### **Emerging Policies and Allocations**

Emerging Policy E1 seeks to ensure the adequate provision of employment floorspace over the Plan period up to 2039.

Part 3 sets out the sites allocated for employment led development and included on this list is the Sainsbury's Baird Road (Crown Road) (SA8) which is earmarked for 20,865sqm of employment floorspace and Sainsbury's Green Lanes (SA32) which is earmarked for 13,325sqm of employment floorspace. Although these sites were promoted through the Call for Sites in 2019, any redevelopment of the sites should incorporate replacement retail for Sainsbury's.

Further detail on the site allocations are provided at Appendix C of the consultation document. Site Allocation SA8 is allocated for 1,041 homes and at least 20,685sqm industrial and logistic space. The site is also allocated for:

*"Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm and environmental improvements, including improved walking and cycling routes".*

Although there is a general statement that ‘compatible main town centre’ uses are also appropriate, no specific reference is made to re-providing the Sainsbury’s foodstore on site.

The allocation should be amended to include specific reference to the re-provision of a foodstore of equivalent size with an appropriate level of adjacent car parking on site.

Site Allocation SA32 is allocated for 299 homes and at least 13,325 sqm of non-residential floor space. Furthermore, this site is also allocated for:

*“Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm and environmental improvements, including improved walking and cycling routes.”*

Again, the allocation does not specifically refer to the re-provision of the Sainsbury’s foodstore and the allocation should be amended to include specific reference to the re-provision of a foodstore of equivalent size with an appropriate level of adjacent car parking on site.

The existing Sainsbury’s stores provide an essential grocery offer at Crown Road and Green Lanes and there is an opportunity for them to perform a crucial anchor role in the redevelopment of SA8 and SA32. Inclusion of a new foodstore will create activity and focus to the residential components of these sites. Sainsbury’s have a proven track record of delivering high-quality mixed-use redevelopment in London. For example, at their Hendon store where they have partnered with an experienced housebuilder to provide 1,300 new homes, a new Sainsbury’s store and other business floorspace as well as high quality public realm.

Whilst we support the redevelopment aspirations of draft allocations SA8 and SA32, it is not clear as to whether the existing Sainsbury’s stores will be re-provided as part of the vision for the area. However, it is clear that the impact of the potential loss of the Sainsbury’s stores has not been fully considered.

There is no doubt that the potential loss of these Sainsbury’s stores will have a significant adverse impact upon the vitality and viability of the local areas. Not only will the job losses impact on the local economy, but in the case of the proposed new Local Centre at Southbury (Policy PL2) the closure of the Sainsbury’s Crown Road store will reduce the number of visitors to the new local centre as many Sainsbury’s shoppers would link their trip with a visit to other facilities in the area.

## **Economic Recovery post Covid-19**

The draft Local Plan makes reference to the changing patterns in the way we work, shop and socialise and that COVID-19 has caused a rise in e-commerce. Whilst the pandemic has altered the way people shop and the demand for online retail is growing, the provision of foodstores in Southbury and Winchmore Hill are vitally important for the local community.

The pandemic has shown how important it is for the community to have access to affordable food and essential products, in close proximity to where they live. The role and function of the Sainsbury’s stores are, therefore, more important than ever as they provide meet the shoppers’ day to day needs at the heart of the community.

The importance of online shopping for food can sometimes be overstated. In the case of Sainsbury’s 85% of the company’s grocery trade still takes place through ‘traditional’ in store transactions.



The Sainsbury's stores at Crown Road and Green Lanes continue to trade very well, with many shoppers visiting the store either on foot, by bicycle or by car. Sainsbury's Crown Road has over 23,000 transactions (excluding online sales) in store every week and the Green Lanes store has more than 36,000 transactions. This is a high number of physical visits. Many of these shoppers link their trip with a visit to other nearby facilities in the area.

Crown Road also has a very busy groceries online (GOL) facility which meet many shopper's online needs. Online sales have more than doubled during lockdown and online operation will continue to be a vital part of the offer for this store. There is currently no GOL facility at Green Lanes.

If the redevelopment of allocations SA8 and SA32 go ahead without the re-provision of a Sainsbury's foodstore, there will be a serious reduction in the accessibility to essential grocery needs for the local community, a disastrous loss of jobs which will largely be felt by local residents, the growth of unsustainable shopping patterns, and potentially adverse highways impacts as demand and trips are diverted to more distant stores.

It will also force the loss of in store facilities at both stores and opportunities including the Argos, pharmacy, travel money, Specsavers, as well as a petrol station at the Crown Road store. Also affected will be local charitable benefits that are delivered through Sainsbury's commitment to supporting their local communities.

### **Car Parking and Servicing**

It is not clear that Site Allocation SA8 and SA32 will require the re-provision of existing car parking spaces. Reducing the amount of car parking as a result of the redevelopment of the site will further damage the attractiveness and accessibility of the local areas. Both existing Sainsbury's stores provide parking for customers and this is particularly beneficial to those with larger families, the less mobile and vulnerable people for whom public transport, cycling or walking is not an option.

Table 10.5 of the recently adopted London Plan (2021) sets out the parking ratios expected for outer London areas however part G of the policy states that amended standards may be considered. Therefore, any redevelopment envisaged by the emerging Local Plan should incorporate the re-provision of adequate car parking to support the viability of the re-provided store.

Any redevelopment also needs to include enough servicing and operational land to enable future businesses to operate efficiently and without impediment. If the servicing is inadequate, then this will damage the attractiveness of the sites to future occupiers and investors.

Finally, in order to safeguard jobs within the store and to ensure that the local community has ready access to groceries, the redevelopment of both sites should be phased to ensure that the Sainsbury's foodstores can have continuous trading.

### **Summary**

In summary, the redevelopment of the Sainsbury's Crown Road and Green Lanes stores as proposed in the emerging Local Plan will have significant implications for the health, vitality and viability of the local area which must be taken into consideration. The closure of Sainsbury's will also lead to very significant job losses which must also be addressed.

Site allocation SA8 and SA32 in the emerging Local Plan should refer specifically to Sainsbury's and either safeguard the existing Sainsbury's stores, with adequate car parking and servicing, or



make provision for a replacement store of an appropriate scale which can continue to act as an anchor for the wider vision of the site, taking into account the need for sufficient car parking and servicing.

We hope that these representations will be incorporated in the next iteration of the plan, and that the Council takes this opportunity to engage constructively with Sainsbury's as a major investor, employer and landowner.

We look forward to hearing from you.

Yours faithfully,