Former Holloway Prison
Main Town Centre Uses
Impact Assessment

Peabody

PEABODY CONSTRUCTION LIMITED

REDEVELOPMENT OF THE FORMER HOLLOWAY PRISON, ISLINGTON

Main Town Centre Uses Impact Assessment

OCTOBER 2021

PUBLIC

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1 INTRODUCTION

1.1.1. This Main Town Centre Uses Impact Assessment has been prepared by WSP on behalf of Peabody Construction Limited (hereafter Peabody) and accompanies the application for the comprehensive redevelopment of the former Holloway Prison site in Islington. The redevelopment of the former Holloway Prison site is a valuable opportunity to re-use a large, accessible and currently under-utilised site in London. It is proposed to deliver residential-led mixed use development of the site, including 985 residential units, Women's Building, and Class E floorspace together with high quality landscaping and green space.

1.1.2. The Class E floorspace has been designed as an integral part of the overall redevelopment, not only to cater to the essential shopping and service needs of its new population, but also to provide active and vibrant uses at street level which will enable this site, with a long history of being alienated from its community, to once again facilitate community connection and interaction.

1.1.3. This Main Town Centre Uses Impact Assessment assesses the proposed Class E floorspace against the relevant NPPF tests, including the sequential and impact tests. It is structured as follows:

- Section 2 provides identifies the site and outlines the proposed Class E floorspace;
- Section 3 outlines relevant national and local policies applying to Class E floorspace;
- Section 4 sets out the retail context;
- Section 5 addresses the sequential test;
- Section 6 provides the main town centre uses impact assessment; and
- Section 7 provides our conclusions.

1.1.4. This Main Town Centre Uses Impact Assessment should be read in conjunction with the other supporting planning application material to provide a comprehensive picture of the scale, importance and acceptability of the proposals. The scope of this report was agreed with officers from the London Borough of Islington in August 2021.

2 BACKGROUND TO THE PROPOSALS

2.1 THE SITE

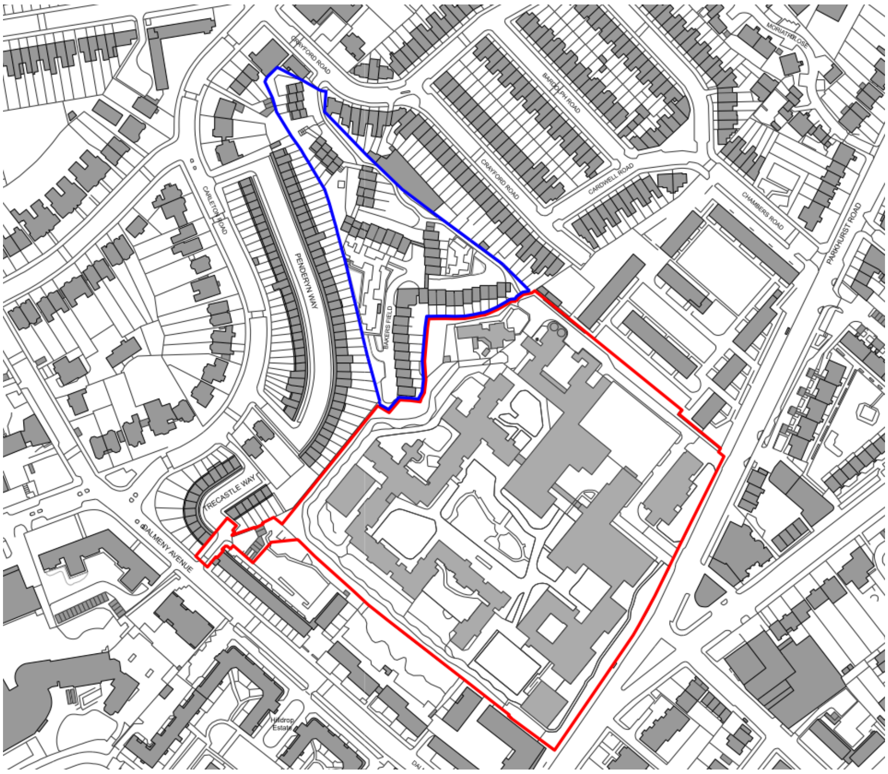
2.1.1. The application site comprises the former Holloway Prison site on Parkhurst Road in Holloway. It comprises a significant portion of the land between Dalmeny Avenue and Parkhurst Road, with frontage to Camden Road. The site has a long history as a prison, with the original mixed prison opening in 1852, subsequently operating as a women-only prison from 1903. The prison was closed in 2016 and the site has since remained unoccupied.

2.1.2. This site is surrounded by primarily residential uses to the north, east, west and beyond Camden Road, to the south. A small number of retail uses are located to the south-east of the site on Hillmarton Road, comprising Hillmarton Road Local Shopping Area. There are also a number of employment uses located around the Camden Road/Hillmarton Road junction. The Cat and Mouse Library is located immediately to the south of the site, on the ground floor of a multi-level residential building. Otherwise, the surrounding context can be described as having a dense residential character.

2.1.3. The site lies approximately 550m south-west of Nags Head town centre, along Camden Road and is separated by intensive residential development. Nag's Head Town Centre functions as a major town centre within Islington's retail hierarchy. Camden Road (A503) is a busy connector road between Holloway and Camden (and beyond) and is well served by London buses.

2.1.4. The location of the site is identified in red in Figure 2-1 below.

Figure 2-1 - Site Location



2.2 THE PROPOSED CLASS E FLOORSPACE

2.2.1. The proposed mixed-use redevelopment of the former Holloway Prison includes an element of Class E floorspace, intended to cater to the everyday shopping and service needs of its new residential population and those attending the Women's Building. The floorspace is provided along the Camden Road frontage of the site to contribute to an active streetscape and to facilitate community interaction between the site and the wider community.

2.2.2. The plans accompanying the application identify up to 1,822sqm (gross) commercial floorspace will be accommodated across five commercial units, with the potential for subdivision. This measurement includes floorspace to be used by the commercial units for storage, waste disposal and circulation. The floorspace to be occupied by the commercial units, excluding the back-of-house space, is 1,294sqm.

2.2.3. Four of the proposed units are located along the Camden Road frontage of Plot B, with four units located at lower ground floor level, a further unit located at upper ground floor level. The fifth unit is located on the north-eastern corner of Plot C adjacent to the Women's Building. All units will be visible from Camden Road and provide an active frontage for the development to the community beyond.

2.2.4. The units will range in size from 97sqm to 700sqm.

2.2.5. Flexibility is sought for all of the floorspace across Class E uses. It is anticipated that it will accommodate convenience uses such as a 'local' format convenience store to meet essential and everyday grocery needs, a butcher, bakery and/or grocer, small scale non-food retailing, retail services and leisure uses such as hairdressers, pharmacy or gym/yoga studio and food and beverage uses such as a café and restaurant.

2.2.6. As noted, it is intended to primarily cater to its new resident population but as it is located at the frontage to the site, and is designed to assist in the integration of the site into the community once more, it is likely also to draw some trade from visitors to the site, pedestrian traffic past the site and nearby residents.

3 PLANNING POLICY CONTEXT

3.1.1. This Section reviews the planning policy context relevant to the provision of main town centre uses at the site. A comprehensive review of planning policy considerations in respect of the wider redevelopment of the site is provided in other supporting planning application material.

3.2 NATIONAL PLANNING POLICY

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

3.2.1. National planning policy is set out within the NPPF and supplemented by the Planning Practice Guidance (PPG). At the heart of the NPPF is a presumption in favour of sustainable development. For decision taking this means approving development proposals that accord with an up-to-date development plan without delay (paragraph 11).

3.2.2. Section 7 sets out the national approach to retail and main town centre uses development and, in particular, the application of the two retail tests.

3.2.3. Paragraph 87 requires a sequential test is carried out for main town centre uses which are not located within a town centre. Paragraph 88 provides further advice on how the sequential test should be carried out and requires applicants and local authorities to demonstrate flexibility on issues such as format and scale.

3.2.4. Paragraph 90 requires all retail, leisure and office development outside of town centres to be subject to a retail impact assessment if over a proportionate, locally set threshold. Where no local threshold exists the default is 2,500sqm (gross). Impact assessments should include assessment of:

- Impact of the proposal on existing and committed and planned public and private investment in a centre or centres; and
- Impact on town centre vitality and viability, including local consumer choice and trade in the town centres and wider area.

3.2.5. Where an application fails the sequential test or is likely to have a significant adverse impact, it should be refused in accordance with paragraph 91.

3.2.6. Paragraph 104 requires developments to be located within areas that are sustainable and can offer a genuine choice of transport modes.

PLANNING PRACTICE GUIDANCE (PPG)

3.2.7. The PPG includes guidance relating to ensuring the vitality and viability of town centres. The PPG underlines the Government’s expectations that local authorities adopt a positive approach to planning for new development, and plan to meet the need for main town centres uses in full.

3.3 THE DEVELOPMENT PLAN

3.3.1. The Statutory Development Plan includes the London Plan (2021); and the adopted and emerging documents comprising the London Borough of Islington Local Plan.

3.3.2. The London Borough of Islington's adopted Local Plan is made up of several documents, including its Core Strategy (2011) and Development Management Policies and Site Allocations documents. It is, however, well advanced in its review of the Local Plan, which was submitted to the Secretary of State in February 2020. Given the advanced stage of the Local Plan review, we outline the relevant planning policy context for the site in respect of the proposed main town centre uses from both the adopted and emerging policy documents. A full review of relevant planning policy is provided in supporting application material.

3.3.3. There are also a number of Supplementary Planning Documents (SPD) including the Holloway Prison SPD (2018).

THE LONDON PLAN

3.3.4. Policy SD6 places emphasis on the importance of town centres and high streets, noting that the vitality and viability of centres should be promoted and enhanced by encouraging a diverse range of uses, strengthening the role of town centres as a main focus for Londoner's sense of place and local identity and ensuring town centres are the primary locations for commercial activity and important contributors to the local and London wide economy.

3.3.5. Policy SD7 relates to how boroughs should take a town centre first approach and discourage out-of-centre development by applying the sequential test to applications for main town centre uses. Also required are impact assessments for proposals for new, or extensions to existing, edge or out of centre development for retail, leisure and office uses that are not in accordance with the Development Plan.

3.3.6. Policy E9 is clear that development proposals should support convenience retail in all town centres but also identify areas under served in local convenience shopping and related services and support additional facilities that serve existing or new residential communities in line with the town centre policies described above.

ADOPTED LOCAL PLAN

3.3.7. Relevant adopted policy for this retail statement includes:

- Core Strategy Policy CS14; and
- Development Management Policy DM4.

3.3.8. Core Strategy Policy CS14 confirms that any major new retail development should be located within its defined network of town centres in accordance with the sequential assessment set out in PPS4.

3.3.9. Development Management Policy DM4.4 confirms that the Council will seek to maintain and enhance the retail and service function of Islington's town centres. It confirms that applications for more than 80sqm of main town centre uses should be located within identified centres. Where suitable locations within centres are not available, Local Shopping Areas or edge of centre sites should be chosen. Where this is not possible, out of centre sites may be acceptable where it is confirmed that sequentially preferable sites have been thoroughly investigated; where the development would not individually or cumulatively have a detrimental impact on the vitality and viability of designated centres or prejudice the prospect of future development; and where the development would be accessible by a sustainable choice of means of transport.

3.3.10. Development Management Policy DM4.4 also confirms that an impact assessment is required for applications for main town centre uses exceeding 80sqm.

EMERGING LOCAL PLAN

Strategic and Development Management Policies 2019

3.3.11. The emerging Strategic and Development Management Policies document (2019) discusses the Nag's Head and Holloway Spatial Area at Policy SP5.

3.3.12. Of relevance, Policy SP5 identifies the former Holloway Prison site as a key local housing site which will help to meet identified housing needs in the borough. It confirms that the site will provide, **inter alia**, high levels of genuinely affordable housing, community uses including a women's building and publicly accessible green open space.

3.3.13. Supporting text to SP5 confirms the importance of the former Holloway Prison site as the largest development site in the borough. Further details are provided in Site Allocation NH7 and the Hollowing Prison Site SPD. These are discussed further below.

3.3.14. Policy R1 discusses the policy context for new retail, leisure and services and culture and visitor accommodation. In respect of new retail uses, Policy R1 states that small shops contribute to the unique character of Islington and support local businesses. It confirms that the Council will protect existing small shops and promote new small shop provision as part of new developments.

3.3.15. Supporting text to Policy R1 goes on to state:

> *LSAs and dispersed retail and leisure uses are an important part of Islington's retail offer. They complement the more significant retail offer in designated Town Centres and play an important role in serving the needs of residents across the borough. They provide a convenient, valuable service to their surrounding communities by meeting the day-to-day shopping needs of residents, workers and visitors as well as providing other services including some leisure uses. LSAs also play an important social role for the surrounding community, providing a commercial focal point and meeting point where people can interact and socialise. These areas contribute to the character and identity of an area.*

3.3.16. Policy R6 relates to maintaining and enhancing Islington's unique retail character. It confirms that the Council views the retention of small shops as a baseline and places great weight on the need to retain any shops which currently or potentially could be utilised by small retailers. In order to encourage new provision of small shop units, it states that the Council will seek to secure small shop units (generally considered to be units of around 80sqm GIA or less) suitable for occupation by small retailers by:

> *(iii) requiring proposals for major housing developments to incorporate small retail units where there is no accessible provision of essential daily goods available within a short walking distance (within 300m).*

Site Allocations 2019

3.3.17. The former Holloway Prison site is identified as Site Allocation NH7 and allocated for residential-led development with community uses (including a Women's Building), open space and an energy centre. It refers to the Holloway Prison Site SPD for detailed guidance on the development considerations and confirms that the SPD will be given 'very significant weight' in terms of any future determination on the site.

Holloway Prison SPD 2018

3.3.18. The Holloway Prison SPD provides comprehensive guidelines on the future redevelopment of this important site. It is specifically intended to accommodate significant new housing, including genuinely affordable housing options, community uses to include a dedicated Women's Building (reflecting its history as a women's prison) and open space and green space opportunities.

3.3.19. The SPD confirms that other uses will be considered at the site, including retail uses. Paragraph 4.28 states the following in this regard:

> *A small amount of retail may be acceptable to serve the local population (existing and new). However, the site is considered to be well served by local shops with the Nag's Head Town Centre in close proximity and two local shopping areas nearby. Café/restaurant use may be desirable and assist with serving the local community and bringing activity to the street in the right locations (e.g. near open space and along Parkhurst Road). However the provision of A1/A3 uses will be subject to an assessment of the impacts on nearby retail locations and consideration of amenity impacts*.

3.3.20. The SPD confirms that an active frontage is required along its Camden Road frontage. Paragraph 5.12 states:

> *On Camden Road and Parkhurst Road the development should establish a strong street frontage with wide footways and ample space to retain existing trees and tree cover along the road. Active ground floor frontages (for examples, retail, commercial and appropriate community uses) should be provided on this part of the site*.

3.4 SUMMARY OF PLANNING POLICY CONTEXT

3.4.1. The proposed Class E floorspace is an integrated and well-designed part of the comprehensive redevelopment of the strategic former Holloway Prison site, which is intended for residential-led mixed use development. It is clear that this is an important redevelopment site within the Borough, with valuable opportunities to ensure it once again becomes a connected and inclusive site which contributes to the community, rather than remain excluded from it as it has been for many years. Policies for its future use, design and composition are focused on delivering a well-designed, connected and inclusive development.

3.4.2. In the context of relevant main town centre uses policy, the site is located outside of any designated centre, although lies opposite the Hillmarton Road Local Shopping Area (LSA) and could be regarded to be 'edge of centre' with respect to the LSA. While the policy context identifies that main town centre uses, such as retail uses, may be acceptable on the site, any proposals for main town centre uses will, therefore, be subject to sequential and impact tests and these are addressed in the following sections.

3.4.3. Importantly, however, it is noted that the emerging Islington Local Plan recognises and values small scale shopping and service opportunities throughout the Borough as providing for essential and every-day needs within reasonable walking distances. It further encourages the co-location of small-scale retail uses alongside major new housing development.

4 RETAIL CONTEXT

4.1.1. In order to provide context to the subsequent sequential and impact assessments that follow, this Section summarises the current health, vitality and viability of the centres within the catchment area of the proposed floorspace.

4.1.2. Nag's Head Town Centre is the only town centre within a 10-minute walking catchment of the site. As previously noted, there are a number of Local Shopping Areas (LSAs) which we have reviewed in detail. The Council have, however, also requested that we consider potential impact on Kentish Town Town Centre which is approximately 17-minutes' walk from the site. Health checks for both town centres have been undertaken and the results are provided in detail in Appendix B and a detailed review of each of the LSAs is provided in this Section.

4.1.3. We summarise our findings below.

4.2 NAG'S HEAD TOWN CENTRE

4.2.1. Our town centre health check confirms that Nag's Head Town Centre has a diverse and strongly performing comparison and convenience offer. It is also well represented in terms of its retail service and food and beverage uses, with a number of new restaurant and café uses re-occupying vacancies identified within the February 2021 Goad data. It is a highly accessible centre and was noted to be very busy at the time of the health check. Our observations confirm that the centre recovering well following the COVID-19 pandemic.

4.2.2. Our findings with respect to the turnover performance of this centre, detailed in Section 6, further confirm its health, vitality and viability.

4.2.3. We are aware that there remains a key town centre site which is identified as part of the wider strategy for restructuring and reinvigoration of the Town Centre. This site is addressed as part of the sequential assessment (Section 5) and in respect of impact on investment (Section 6). Our findings indicate that the proposals will not delay or in any way impact on the delivery of this scheme as it simply does not compare. The proposed floorspace has a different scale, role and function and its future operators are not likely to be the same as those required to underpin the town centre redevelopment.

4.3 KENTISH TOWN TOWN CENTRE

4.3.1. Our town centre health check identified that Kentish Town Town Centre has a good convenience food offer, and it is considered that the presence of a national retailer superstore (the Co-Operative) and a discount food store (Iceland), amongst smaller independent stores, enables the centre to meet the convenience retail needs of the surrounding area.

4.3.2. However, it is anticipated that residents will need to go elsewhere to meet all of their comparison retail needs, specifically in terms of clothing. There is a limited clothing and fashion offer with the majority of the clothing stores being charity shops.

4.3.3. Estate agents comprised the majority of the financial and business services and there were many restaurants and pubs present offering a good evening economy.

4.3.4. Our health check also confirmed a reduction in vacant units since the centre was surveyed by Experian Goad in March 2021. Our visit confirmed that there were only 17 vacancies within the town centre, a reduction from the 21 vacancies recorded in March. The vacancies were evenly distributed throughout the centre, with no significant clusters.

4.3.5. Overall, the town centre is accessible, has a diverse offer and appears popular. There is no evidence of significant weakness in the town centre. Given the considerable distance between the application site and Kentish Town Town Centre, we do not expect the proposed floorspace to have any material impacts on Kentish Town Town Centre.

4.4 LOCAL SHOPPING AREAS

4.4.1. There are four Local Shopping Areas (LSA) within a 10-minute walking distance of the site. These include Hilmarton Road LSA, Cardwell Terrace LSA and Brecknock Road LSA.

4.4.2. Local Shopping Areas are too small to be surveyed by Goad. However, our observations suggest that the existing LSAs are performing within their intended role and function as meeting small scale shopping and service needs. None appear to be unduly unhealthy or lacking vitality and the larger centres, such as Brecknock Road and Caledonian Road LSAs, appear particularly healthy and popular. There is no evidence of significant weaknesses.

4.4.3. We undertake a detailed review of each of the relevant LSAs below.

HILLMARTON ROAD LSA

4.4.4. Hillmarton Road LSA is located immediately across from the site of the proposed development, at the junction of Camden Road and Hillmarton Road. It comprises four shop units, all currently occupied. Current tenants include an off licence, a nail bar, an Indian takeaway and a small convenience store specialising in Polish and Columbian grocery goods.

4.4.5. This is a small collection of shops and services meeting very local and specialised needs. While there may be some overlap in the range of goods sold at Hillmarton Road LSA and the tenants who ultimately occupy the floorspace at the proposed development, we consider that it is unlikely that the proposed floorspace will significantly impact on the Hillmarton Road LSA for a number of reasons.

4.4.6. Firstly, the range of goods sold in the convenience store is specialised and unlikely to be duplicated in the proposal. Therefore, those people who are shopping at the convenience store are unlikely to be diverted in significant numbers to a non-specialist convenience store.

4.4.7. Secondly, the proposed development will considerably increase the immediately local population. As Hillmarton Road LSA is located along the most direct walking route to access Caledonian Road underground station, which is the nearest underground station to the site, we expect that, rather than significantly impacted, Hillmarton Road LSA will benefit from the increased expenditure in the local area and the increased pedestrian traffic past the LSA.

4.4.8. Although Camden Road separates the proposed floorspace and Hillmarton Road LSA, we expect that, once trading is established, the two could function as a larger LSA and be mutually supportive.

CARDWELL TERRACE LSA

4.4.9. Cardwell Terrace LSA is approximately 5 minutes' walk from the site, accessed off Camden Road, via Chambers Road. It is currently comprised of a newsagent, a laundrette, three office units and one vacancy.

4.4.10. Given the relatively limited retail offer of the LSA at present, we do not expect that there will be significant impact on this LSA. If surrounding residents are currently using the newsagent for very local and specific needs, it is highly unlikely that they will walk further to facilities at the application site simply for a newspaper, lottery or very basic convenience needs. The existing newsagent meets basic local needs for its immediately surrounding residents and that will not change with the proposed floorspace. It has a dense surrounding residential population and does not significantly rely on pass-by trade that is likely to be diverted to the proposed floorspace.

4.4.11. Similarly, residents using the laundrette would not walk to an alternative unless it was significantly closer for them. The proposed floorspace may not include a laundrette in any case.

4.4.12. For this reason, we do not expect that the proposed floorspace will compete with Cardwell Road LSA to any significant extent.

BRECKNOCK ROAD LSA

4.4.13. Brecknock Road is the largest LSA within the 10-minute catchment, located approximately 7 minutes' walk from the site, south-west along Camden Road. Brecknock Road is the boundary between London Boroughs of Islington and Camden and therefore, the units on the northern side of Brecknock Road and York Way are located within Islington and those on the southern site are located in Camden (and designated as a neighbourhood centre). This administrative division does not impact its wider function.

4.4.14. For its role and function, Brecknock Road comprises a good range of convenience, comparison and retail service uses as well as a number of cafes and takeaway restaurants. Specifically, we noted uses including a number of convenience stores, butchers, bakeries, a pharmacy, newsagents, tobacconist, together with estate agents, nail salons, tattoo artist, a post office, a makeup school, a variety store as well as a range of takeaways, restaurants and cafés. There were only 3 vacant units evenly distributed throughout the centre.

4.4.15. Our observations were that, collectively, Brecknock Road LSA/Neighbourhood Centre operates as a large and vibrant local shopping hub.

4.4.16. Importantly, Brecknock Road LSA/Neighbourhood Centre represents a considerably larger retail hub than that proposed at the application site, having a wider and stronger draw due to its goods, range of uses and facilities. We consider that the residents of the proposed housing are likely to use Brecknock Road LSA, but that the proposed floorspace will have very limited draw away from Brecknock Road unless the proposed floorspace is significantly more convenient for shoppers (ie: close to home/en-route to work etc). We have accounted for a limited convenience and comparison draw in our impact assessment (Section 5) from LSA facilities which we expect will largely fall on Brecknock Road LSA as there are units within this centre which are most comparable to those likely to be accommodated at the proposed development.

CALEDONIAN ROAD LSA

4.4.17. Caledonian Road LSA is a linear LSA located along Caledonian Road between Market Road and North Road. Caledonian Road underground station is located at its northern end.

4.4.18. The centre comprises three convenience stores including a Sainsbury's Local, Nisa Local and Tesco Express. Each are located at ground floor level of multi-level residential buildings and provide good examples of the successful delivery of mixed-use redevelopment, with ground floor active uses and the viable operation of multiple nearby convenience stores.

4.4.19. Other uses within the centre include cafes, a car rental office, yoga studio, takeaway and natural foods store. The centre also includes the London School of Massage and UCL building.

4.4.20. The proposed floorspace may compete with the convenience stores within Caledonian Rod LSA to a limited extent, given that this is the closest underground station to the former Holloway Prison site, but overall we expect negligible impact as the stores are also likely to benefit from increased pedestrian traffic through the underground station.

4.5 SUMMARY

4.5.1. This Section has summarised our assessment of the health, vitality and viability of centres within the catchment area. It confirms that each of the centres appears to be healthy, vital and viable, with no evidence of weakness or vulnerability. This provides relevant context to the subsequent sequential and impact assessments.

5 SEQUENTIAL ASSESSMENT

5.1 POLICY CONTEXT

5.1.1. Paragraphs 87-88 of the NPPF require the sequential approach to site selection to be applied to all development proposals for main town centre uses that are not in an identified centre and not in accordance with an up to date Development Plan. The NPPF states that applications for main town centre uses should be in town centres, then edge of centre locations, and only if suitable sites are not available within a reasonable period, should out-of-centre sites be considered. It also requires applicants and local planning authorities to demonstrate flexibility on issues like format and scale.

5.1.2. Paragraph 91 states that where an application fails to satisfy the sequential test it should be refused. However, that paragraph does not create a presumption against granting planning permission. Conflict with NPPF paragraphs 87 and 91 can be outweighed by other factors, such as the environmental, economic and social benefits of the development.

5.1.3. In addition, the PPG on 'Town Centres and Retail' provides guidance on the application and interpretation of the sequential test. The PPG states that it is for the applicant to demonstrate compliance with the sequential test (Paragraph: 011 Reference ID: 2b-011-20190722).

5.1.4. The PPG further identifies those considerations (ref: 011 ID 2b-011-20190722) that should be taken into account when determining whether a proposal complies with the sequential test, based on the following:

- Has the suitability of more central sites to accommodate the proposals been considered, having regard to flexibility;
- Is there scope for flexibility in the format and/or scale of the proposal; and
- If there are no suitable sequentially preferable locations, the sequential test is passed.

5.2 SEQUENTIAL TEST METHOD

5.2.1. The application site is in an out of centre location in terms of retail policy. As such, the following section considers the proposal against the sequential test outlined in the NPPF and associated PPG. The methodology for the sequential assessment is based on the advice provided in the PPG and the checklist provided at Paragraph: 010 Reference ID: 2b-011-20190722.

5.2.2. The proposed retail floorspace relates to 1,822sqm (gross) intended to be provided across 5 units ranging in size from 97sqm to 700sqm.

5.2.3. In accordance with established case law, sequentially preferable sites must be capable of accommodating the proposal as a whole, applying a degree of flexibility. It is not necessary to demonstrate sequential compliance in the context of disaggregating elements of the proposal.

5.2.4. The established case law includes the Supreme Court Judgement Tesco Stores Ltd v. Dundee City Council (dated 21st March 2012), which has been regularly and comprehensively cited in terms of its clarity on the application of the sequential approach. The Judgement concluded that in order for a site to be considered 'suitable', conclusions should be based on a 'real' world assessment, and whether an alternative site is suitable for the development proposed, not whether the proposed development can be altered or reduced to fit alternative sites, making allowance for a reasonable degree of flexibility in terms of the format and scale of the proposed development.

5.2.5. This position is highlighted in the Rushden Lakes appeal decision (ref: APP/G2815/V/12/2190175) relating to a new retail park, which provides clarity on the issue of disaggregation in terms of national policy requirements. At paragraph 8.47 of the Inspectors' decision, it states:

> *''The last sentence of NPPF [24] states that: "Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale." This contrasts strikingly with what was said previously in PPS4 in policy EC15.1 at (d) (iv) and 15.2 which contained an explicit requirement for disaggregation. There is no longer any such requirement stated in the NPPF. It is no answer to this to refer to the words "such as" in the last sentence of NPPF [24]. These words cannot be read so as to imply that a major, and extremely controversial, part of previously stated national policy lives on by implication in the NPPF. Had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF. If it had been intended to carry on with the requirement then all that would have been required is the addition of the word "disaggregation" at the end of NPPF [24]'' (our emphasis).*

5.2.6. The Secretary of State agreed with the Inspector's view that there is not any requirement to consider if proposals can be disaggregated.

5.2.7. Similarly, in the Scotch Corner decision from December 2016 (Ref. APP/V2723/V/15/3132873 and APP/V2723/V/16/3143678), the Inspector found that the sequential test does not require the applicant to disaggregate schemes and stated at paragraph 11.7 of the decision that the "sequential test seeks to see if the application, i.e. what is proposed, can be accommodated on a town site." The Secretary of State agreed with the Inspector's conclusions.

5.2.8. The Secretary of State's decision in October 2018 in relation to The Mall at Cribbs Causeway (Ref: APP/P0119/V/17/310627) again confirms that disaggregation is not required.

5.2.9. In a more recent appeal for an Aldi foodstore in Gillingham, Dorset in January 2019, (Ref. APP/N1215/W/18/3195092), the Inspector was clear that in applying the sequential approach at paragraph 29 that:

> "*The question is whether any suggested alternative site is suitable and available for the broad type of development currently proposed in terms of size, type and range of goods, incorporating the requirement for flexibility."*

5.2.10. In summary, whilst national policy requires a degree of flexibility in relation to format and/or scale in the sequential test, it is clear from the above decisions and case law that disaggregation is not a requirement of the sequential test. This has been agreed during early engagement with officers in respect of the proposals.

5.2.11. Nevertheless, we understand that we must demonstrate flexibility and realism and therefore we propose to assess sites which could accommodate 20% less floorspace than proposed. This means that we will consider if 1,458 sqm (rather than 1,822 sqm) can be accommodated in any of the centres. Again, this approach has been agreed with officers through early engagement.

5.2.12. The catchment area (and therefore the search area adopted) of the proposed floorspace is determined by its relatively local role and function, catering principally to the needs of the accompanying housing and immediately surrounding residents. Furthermore, the tenants accommodated will include those which cater to limited, local and everyday needs. Therefore, it is unlikely to attract people from much further than a 10-minute walking catchment around the site. This is shown in Appendix A.

5.2.13. As agreed with the Council, sequential sites and units have been sought within or on the edge of:

- Nags Head town centre;
- Hillmarton Road LSA;
- Cardwell Terrace LSA;
- Brecknock Road LSA;
- Caledonian Road LSA; and
- Kentish Town Town Centre (LB Camden).

5.3 THE CASE FOR THE PROPOSED LOCATION

5.3.1. The centres identified above are assessed for their opportunities to accommodate the proposed floorspace further below. However, at the outset, we provide the case for the proposed location of the Class E floorspace as this is material to its consideration against the sequential test.

5.3.2. As previously explained, the proposed floorspace is intended to primarily cater to the needs of the residents of the housing also proposed as part of this application. As estimated in our impact assessment in the next Section, the proposed housing is estimated to accommodate in excess of 2,206 people. Clearly, this is a very significant addition to the local resident population and aside from the very small-scale facilities that are located at Hillmarton Road LSA, the 2,200+ new residents would have to walk 550m to Nags Head town centre, 650m to Brecknock Road LSA or 700m to Caledonian Road LSA to access a suitable range of local, everyday shopping and service needs. This is well beyond what is ordinarily considered to be a suitable or acceptable walking distance (around 300m) when taking into account any mobility/disability issues; the fact that people may be carrying multiple shopping bags; or walking these routes at night/in the winter dark.

5.3.3. As is also demonstrated in our impact assessment further below, the proposed resident population will generate enough expenditure to largely support the proposed facilities which indicates that they are of an appropriate size and scale for their intended purpose. This is particularly relevant when considered in terms of their proposed location; ie: the floorspace is clearly intended to serve the needs of the new residents and as such, are best and most conveniently located on site.

5.3.4. Furthermore, and as the Council would be well aware, the inclusion of retail floorspace in a significant new housing development is often important to securing the viability of the redevelopment of the wider site. As the sequential test itself recognises, ensuring the viability of a proposal, or as Lord Hope describes it within the well-cited Dundee decision, operating within a ‘real word’ in which developers wish to operate, is a fundamental consideration. The proposed retail floorspace has an important part in securing the overall viability of the wider redevelopment which brings significant benefits for the site and the community; including the regeneration benefits of the re-use of a large, prominent and under-used site; significant local employment opportunities firstly, in its construction and subsequently, in the delivery of a Women’s Building, concierge floorspace, and retail floorspace; and important social benefits from the delivery of affordable housing, a Women’s Building, and the public garden (public park).

5.3.5. In summary, the proposed retail floorspace is fundamentally inter-linked with the wider redevelopment of the site and it is most appropriately located on site and as a well-designed component of the wider scheme; rather than as ad-hoc provision elsewhere which achieves none of the potential benefits described above.

5.3.6. We turn to the assessment of alternative sites below.

5.4 ASSESSMENT OF ALTERNATIVE SITES

5.4.1. The search for sequentially preferable sites was undertaken using the following sources:

- Sites identified in pre-application feedback;
- Existing allocations; and
- Vacant units within and on the edge of existing centres.

NAGS HEAD TOWN CENTRE

Vacancies

5.4.2. The latest Goad Centre Report for Nags Head Town Centre (known as 'Holloway' for the purposes of the Goad Report) (dated 15/02/21) identifies 38 vacant properties, occupying some 50,000sqft (circa 4,600sqm). The vacancies are widely dispersed throughout the town centre, with no clusters of vacancies that are large enough to accommodate the proposed floorspace even allowing for flexibility.

5.4.3. There are a number of units located at the ground floor of the Odeon Cinema building which are currently under alteration. In 2018, planning permission was granted for the change of use of these units from Class A1 retail to Class A3 restaurant uses and it was proposed to convert the multiple retail units to a single restaurant unit (refs: 2018/1888/LBC and 2018/1889/FUL and 2019/2501 /S19). Approval of details (AOD) applications have been processed in relation to this permission as recently as April 2021, indicating that plans to deliver new uses at this location remain in place.

5.4.4. WSP undertook a health check of Nag's Head Town Centre in September 2021 to confirm that no further sites have become available since it was surveyed by Experian Goad. Our observations have confirmed that there are now only 12 vacant properties, individually ranging in size from 415sqft - 1,848sqft (38sqm – 172sqm). This is a very significant reduction in vacancies and is a positive reflection of the performance of the centre, since Covid restrictions were eased earlier in the year. Again, there are no large clusters of vacant units that could accommodate the proposals.

Site Allocations

5.4.5. Within Nags Head town centre, the area comprising the Nags Head Shopping centre (including Morrisons and adjacent car park),10 Hertslet Road, 8 to 32 Seven Sisters Road (including the Nags Head Market) is identified as site allocation NH1.

5.4.6. The emerging Site Allocations document (2019) identifies that site NH1, which is in mixed private ownership with multiple leaseholders including Morrisons on a long leasehold, is approximately 16,015sqm in size and has the potential for retail-led mixed use development which should maximise the retail offer of Nag's Head Town Centre. It further identifies potential for significant new office uses, together with an element of residential accommodation, and an improved market facility.

5.4.7. The proposals are clearly unsuitable for site NH1 for a number of reasons:

- The proposals do not involve significant office uses, nor do they accommodate an improve market facility;

- There are significant land assembly issues that are associated with this site, which would not only delay delivery, but also create significant viability issues for the delivery for the relatively small-scale floorspace proposed; and
- At circa 1,800sqm, the floorspace does not represent an intensification or appropriate redevelopment of this key site and the opportunity to use this site as a catalyst for regeneration of the town centre would be lost.

5.4.8. For these reasons, site allocation NH1 is dismissed as a sequential site.

5.4.9. Site Allocation NH3 relates to 443-453 Holloway Road which is a warehousing site on the outskirts of Nag's Head Town Centre. It is considered suitable for the intensification of business uses (including office and warehouse use) and commercial uses along Holloway Road.

5.4.10. At 5,386sqm, the site is too large for the proposed floorspace and the proposals also do not represent the nature and scale of mixed-use development envisaged for this site. In any case, we note that this site remains occupied by Safestore and the Green Room Café. The adjoining Billiard Factory comprises refurbished warehouse space for rent but this is not of an appropriate format to accommodate the proposed retail uses.

5.4.11. In summary, this site is neither available nor suitable for the proposed floorspace.

5.4.12. Site Allocation NH4 relates to the former Territorial Army Centre on Parkhurst Road. It is an edge of centre site. The site is envisaged for residential use with possible ongoing use by the Ministry of Defence on part of the site. In 2020, planning permission was granted for the redevelopment of the site to provide 118 residential units on site together with car and cycle parking and associated landscaping works (ref: 2020/0648/FUL). Associated Approval of Details (AOD) applications have been submitted and site works have commenced. This site is therefore unavailable for the proposed floorspace, but notably, is only 350m from the application site and represents a further increase in the local population available to support existing retail facilities and those proposed as part of this application.

5.4.13. Finally, Site Allocation NH5 is located opposite the application site at 392A and 394 Camden Road, with frontage also on Hillmarton Road. The site is 1,722sqm in size and is intended for redevelopment for residential and business use. It falls within an employment growth area allocation which confirms it is allocated for new business uses. The proposed floorspace is not suitable to fulfil the objectives of this allocation and as it is equal distance from existing centres, it is not sequentially preferable in terms of its location. It is again, relevant to note that the redevelopment of this site for residential and/or business uses represents a further intensification of uses that will again generate demand for new retail floorspace and the proposed floorspace will be well located to cater to such needs. This site is dismissed on the basis that it is not suitable.

5.4.14. Nags Head town centre is approximately 7-minute walk (or 550m) from the site. There is a clear separation between the site and the town centre with high density residential uses. While the town centre will continue to perform a strong and important role as a retail and leisure hub for residents of Holloway and surrounding suburbs, the proposed floorspace will cater to a very different function, catering largely to the everyday, last minute and essential convenience and comparison needs of its immediately surrounding residential population. The large majority of this will come from the residents of the proposed housing that accompanies the floorspace as part of the redevelopment of the former Holloway Prison site. Therefore, the proposed floorspace is most appropriately located on site.

5.4.15. We conclude that there are no suitable or available sequential sites within or on the edge of Nags Head town centre, or any site allocations, that can accommodate the proposed floorspace.

HILLMARTON ROAD LSA

5.4.16. There are no vacant units within Hillmarton LSA at this time.

CARDWELL TERRACE LSA

5.4.17. There is one, small vacant unit within Cardwell Terrace LSA. This is insufficient to accommodate the proposed floorspace even when applying a degree of flexibility.

BRECKNOCK ROAD LSA/NEIGHBOURHOOD CENTRE

5.4.18. Brecknock Road LSA lies on the Islington/Camden boundary, with the eastern side of Brecknock Road/York Way located within London Borough of Islington and the western side located within London Borough of Camden. Clearly, the administrative division makes no difference to the function of this centre, and it is not treated any differently in the application of the sequential test.

5.4.19. Recent inspection of the centre confirmed that there are only three single unit vacancies within the centre. The existing vacancies cannot accommodate the proposed floorspace in the form proposed, even when applying a degree of flexibility.

5.4.20. It is concluded that there are no sites within Brecknock Road LSA/Neighbourhood Centre which can accommodate the proposed floorspace.

CALEDONIAN ROAD LSA

5.4.21. Caledonian Road LSA is a long, linear LSA located along Caledonian Road, with the Caledonian Road underground station centrally located. We identified one small, run-down vacant unit within the LSA which is far too small to accommodate the proposed floorspace.

5.4.22. However, we also noted several successful examples of similar mixed-use redevelopments within the LSA, which include intensive housing provision above ground floor Class E uses. In particular, there are three convenience stores – Sainsbury's Local, Nisa and Tesco Express – who have occupied units at ground floor below significant housing developments within the Caledonian Road LSA. Notably, each are operating viably despite their proximity to one another.

5.4.23. There are no sites within Caledonian Road LSA that are suitable or available to accommodate the proposed floorspace.

KENTISH TOWN TOWN CENTRE

5.4.24. Kentish Town Town Centre is located within the London Borough of Camden and is approximately 17min walk from the site of the proposed floorspace. The Camden Retail and Town Centres Study 2013, now somewhat dated, identifies that Kentish Town was performing reasonably well in terms of its convenience and service provision, but that it had a lower than average comparison provision. Vacancy rates were lower than average. Improvements to its environmental quality has enhanced the overall shopping experience within Kentish Town Town Centre and although it has some weaknesses, the centre was considered to be functioning well.

5.4.25. The latest Goad Centre Report (dated 8 March 2021) identifies that vacancies remain lower than the national average at 12.6%; and also that comparison provision is below average. Convenience and service provision remain strong. Our recent health check confirms that there are 17 vacancies distributed throughout the centre, none of which are large enough to accommodate the proposed floorspace. This is a reduction in the number of vacancies identified in March 2021.

5.4.26. Given its distance from the site and the opportunity to access the same needs at closer centres, it is highly unlikely that residents of the proposed housing at the former Holloway Prison site would regularly use Kentish Town Town Centre for essential convenience and comparison goods. It is simply too far away to reasonably cater to the essential shopping and service needs of the new resident population of the former Holloway Prison site and its immediate catchment.

5.4.27. In summary, we are not aware of any site allocations in and on the edge of Kentish Town Town Centre that could accommodate the proposals and it is too far away to reasonably cater to the essential needs of the new resident population and its immediate catchment.

5.5 SUMMARY OF SEQUENTIAL ASSESSMENT

5.5.1. The proposed floorspace is subject to the sequential test in accordance with NPPF requirements.

5.5.2. We have liaised with Council officers to agree that it is not necessary to disaggregate the proposals and to confirm the centres which require assessment in the context of sequentially preferable sites.

5.5.3. Our assessment of sites has considered sites within and on the edge of Nags Head Town Centre and Kentish Town Town Centre; and a number of local shopping areas including Hillmarton Road LSA, Cardwell Terrace LSA, Caledonian Road LSA and Brecknock Road LSA. We have not identified any sequential sites that are suitable, available or viable to accommodate the proposed floorspace.

5.5.4. Importantly, there is a clear case for providing the proposed floorspace in the proposed location; that is, as part of an integrated and well-designed component of the wider redevelopment of the former Holloway Prison site. The proposed floorspace is primarily intended to meet the essential convenience and comparison needs of the new population generated by the proposed housing at the site; and it is appropriately designed in terms of its size and scale to meet these needs. We also note, that through Site Allocations, there will be further intensification of residential and employment activity in the vicinity of the site which the proposed floorspace will be well-located to cater for.

5.5.5. The proposed floorspace will provide local, small scale Class E uses to an increased residential population within a reasonable walking distance. There are no other sites within the catchment which can suitably or appropriately accommodate the proposed floorspace and meet the same needs.

6 IMPACT ASSESSMENT

6.1 POLICY CONTEXT

6.1.1. As noted in Section 3, the NPPF requires the impact test to be applied for retail proposals that are not in accordance with an up-to-date Local Plan, if the proposed development is over 2,500sqm or a proportionate, locally set threshold. Specifically, the NPPF expects that retail developments outside town centres include an assessment of:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability including local consumer choice and trade in the town centre and wider retail catchment (as applicable to the scale and nature of the scheme).

6.1.2. London Borough of Islington Adopted Development Management Policy DM4.4 confirms that applications for new main town centre uses exceeding 80sqm located outside of designated town centres must demonstrate that the development would not, individually or cumulatively, have a detrimental impact on the vitality and viability of town centre and local shopping areas within Islington or adjacent boroughs.

6.1.3. The proposals relate to more than 1,800sqm gross retail floorspace and as such, this section assesses the impact considerations set out in paragraph 91 of the NPPF and the methodology set out within the Planning Practice Guidance.

6.1.4. The wording within the NPPF and the Practice Guidance is concerned with 'significant adverse impact'. The policy and guidance have been purposefully drafted in these terms because it is accepted that most new developments will have some impact. The pertinent question, therefore, is not whether there will be an impact, but whether the impact is 'significant' and 'adverse'.

6.1.5. This impact assessment assesses impact on centres within the catchment area. It assesses impact on centres as a whole (including both convenience and comparison turnover) and identifies any potential impact on existing or planned public or private investment plans. Firstly, the impact assessment considers the potential impact on vitality and viability of the designated centres, including local consumer choice in the centre and wider retail catchment area.

6.2 IMPACT ON VITALITY AND VIABILITY

6.2.1. Section 4 and the detailed health checks provided within Appendix B provide our assessment of the current health, vitality and viability of the centres within the catchment area of the proposal, plus an additional centre, Kentish Town Town Centre, which we have assessed at the request of the Council.

6.2.2. Our findings confirmed that there is no evidence of weakness or vulnerability within any of the centres assessed, and indeed, that Nag's Head Town Centre, which is likely to experience the bulk of the impact, is performing very strongly.

6.2.3. Taking account of the findings in respect of quantitative impact outlined further below, we conclude that the proposed floorspace is unlikely to result in significant adverse impact on the vitality and viability of Nag's Head Town Centre, which shows no evidence of weaknesses or decline.

6.3 IMPACT ON COMMITTED AND PLANNED INVESTMENT IN THE CATCHMENT AREA

6.3.1. Site Allocation NH1 relates to the redevelopment of a significant part of Nag's Head Town Centre, including the existing Morrisons supermarket and car park, the Nag's Head market and a number of surrounding uses. In total, the site is estimated to extend to 16,015sqm and is within mixed multiple private ownership. It has been a site allocation in the adopted Site Allocations 2013 document and remains a site allocation in the emerging Site Allocations 2019 document.

6.3.2. The emerging NH1 allocation identifies that:

- The site has potential for a significant retail-led mixed-use development, with provision of improved retail provision (in terms of quantum and quality) as well as a significant amount of new office floorspace; residential accommodation may be acceptable on the upper floors, subject to amenity issues being addressed. Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and enhancement of the covered market will be supported.

6.3.3. Our impact assessment confirms that Nag's Head Town Centre is a popular and strongly performing centre. This is an important and significant redevelopment site, and the intention is to maximise its redevelopment potential so that it continues to underpin the role and function, health and vitality of Nag's Head Town Centre. The proposals do not in any way represent a comparable development scheme to that intended for NH1 and will not impact on its delivery.

6.3.4. As discussed in Section 4, when addressing the sequential test, the proposals are for small-scale convenience and other main town centre uses intended to activate ground floor floorspace and meet essential and every-day needs of the new residential population on the former Holloway Prison site (also a site allocation). On the other hand, Site Allocation NH1 involves a significant and strongly performing foodstore, key town centre parking and the Nag's Head market which contributes to the identity of the centre. The site allocation envisages the same or more retail floorspace to be re-provided, together with 'significant' office uses and possible residential uses. The proposed floorspace at the former Holloway Prison could not reasonably be regarded to be likely to divert potential tenants, operators or even investors in the NH1 site, or duplicate uses/create a competing destination. The schemes are entirely different, and the redevelopment of the former Holloway Prison site will instead support the local community rather than significant impact on it.

6.3.5. We are not aware of any other committed or planned investment in the catchment area.

6.3.6. For these reasons, we do not expect significant adverse impact on any committed or planned investment in the catchment area.

6.3.7. We turn to the quantitative assessment of impacts below.

6.4 QUANTIATIVE ASSESSMENT OF IMPACT

CATCHMENT AREA

6.4.1. The size and nature of the proposed floorspace has been formulated on the basis that it will largely serve the local and everyday needs of the residents of the housing component of the application. However, as it provides an active frontage at ground floor level along Camden Road, the proposals are also likely to draw an element of walk-in trade from surrounding residents, employees and passing pedestrians. As such, we have defined a 10-minute walking catchment as the most appropriate catchment for the proposed retail floorspace.

6.4.2. As we are using the Council's Retail Study to underpin this impact assessment, we have also had regard to our catchment with respect to the zones defined within the London Borough of Islington Retail and Leisure Study (LBIRLS 2017). The site is situated in the southern part of Zone 5 (Archway), on its boundary with Zone 7 (Barnsbury). A 10 min walking catchment would also stretch marginally into Zone 3 (Holloway). Our impact assessment, therefore, considers shopping patterns in Zones 3, 5 and 7.

6.4.3. In line with PPG guidance, we have assessed impact on the turnover of the centres as a whole.

SCALE, FORM AND CHARACTERISTICS OF THE PROPOSED FLOORSPACE

6.4.4. The proposed Use Class E floorspace provision at the site is for 1,294sqm NIA to be provided across five units ranging in size from 97sqm - 700sqm. Flexibility is sought for all of the units within Class E uses, but it is anticipated that, given the intended function of the floorspace to act as a hub for the new residents, that it is most likely to accommodate small scale convenience, retail service and leisure uses, together with a café.

6.4.5. Given that flexibility is required within Class E, and that specific uses cannot be assigned to specific units at this stage, we have undertaken a broad assessment of impact of up to 1,300sqm (NIA) split into a likely overall composition based on Class E uses. The extra margin enables us to robustly assess impact while allowing for the fact that flexibility is sought for the use of the floorspace.

6.4.6. We have tested the floorspace on the following basis:

	Convenience floorspace	Comparison Goods	Retail Service / Leisure	Food and Beverage	Total
Net Internal (sqm)	700	150	225	225	1,300
Net Sales (sqm)	525	105	158	158	945

*Figures are rounded.

6.4.7. As set out above, we consider it is most likely that a small format convenience store could come forward to occupy the proposed convenience floorspace which will comprise approximately half of the proposed floorspace, comprising of 700sqm (NIA). A net:gross of 75% is assumed for the convenience floorspace.

6.4.8. We have assumed a very small comparison goods floorspace provision, allowing for the fact that the proposals may include uses such as a small pharmacy or mobile phone shop. Retail service and leisure uses, such as hairdressers/beauty salon or a gym/yoga studio, are expected to occupy up to 225sqm, while food and beverage uses such as a café and/or restaurant are similarly assumed to occupy up to 225sqm. A net:gross ratio of 70% is applied to these uses.

METHODOLOGY AND TIME FRAME FOR ASSESSING IMPACT

6.4.9. It has been agreed that the LBIRLS 2017 is an appropriate and up-to-date evidence base document to be relied upon for this impact assessment.

6.4.10. We consider that an appropriate design year for the proposed retail floorspace is 2026, based on the guidance provided by PPG. This assumes the planning application will be determined in early 2022 and that the retail floorspace will be opened in 2024. On this basis, 2026 represents the second full year of trading, which is a robust design year. It was agreed with the Council we tested the impact of the proposal at 2026. This is also a convenient year because it ties in with the LBIRLS 2017. However, in reality the retail floorspace will not be completed until 2027 and so the design year could be as late as 2029. As such our assessment provides a conservative assessment and worst-case scenario because the impact will fall over time as a result of population and expenditure growth.

6.4.11. Estimates of current store turnovers are based on market shares. Estimates of the turnover of the proposed floorspace are based on company averages, derived from the sales densities advised by Global Data (2020), and where necessary, industry accepted averages.

6.4.12. The impact assessment adopts a 2015 price base to accord with the LBIRLS 2017.

6.4.13. The Tables provided at Appendix C provide our quantitative assessment of the impact of the proposed development.

6.5 IMPACT ASSESSMENT

POTENTIAL TURNOVER OF THE PROPOSED FLOORSPACE

6.5.1. Table 1, Appendix C estimates the likely turnover of the proposals based on the floorspace assumptions outlined above.

6.5.2. The turnover of the convenience floorspace element of the proposals is based on a sales density which is an average of Sainsburys, Tesco and Co-op sales densities from Global Data (2020), rebased to 2015 prices, with an allowance for increases in floorspace efficiencies to 2026.

6.5.3. The comparison sales density is taken from the assumptions used in the LBIRLS 2017 for comparison goods floorspace at 2026. The food and beverage sales density is a WSP estimate based on industry averages.

6.5.4. Table 1 identifies that the turnover of the convenience element of the floorspace is estimated to be £6.39m at 2026.

6.5.5. The turnover of the comparison goods element is estimated to be £0.77m.

6.5.6. The turnover of the food and beverage element is estimated to be £1.01m.

6.5.7. The total turnover of the proposed floorspace is estimated to be £8.18m at 2026.

POPULATION AND EXPENDITURE POTENTIAL OF THE NEW POPULATION

6.5.8. Table 2, Appendix C estimates the likely population and expenditure of the residential population likely to be generated by the proposed housing.

6.5.9. Table 2A uses a an ONS census derived persons per household assumption of 2.4 to estimate the likely population of the proposed development to be 2,206 persons at 2026.

6.5.10. Using expenditure per capita estimates derived from the LBIRLS 2017 for Zone 5 (the 'home' zone) for convenience, comparison and food and beverage spending, Table 2B estimates a total available convenience expenditure of £5.13m; a total available comparison expenditure of £8.01m; and a food and beverage spend of £4.55m. This gives a total available expenditure of £17.69m at 2026.

6.5.11. Notably, the total available convenience expenditure (£5.13m) exceeds the estimated convenience turnover of the proposed convenience floorspace (£6.39m). Therefore, the new resident population will generate more than sufficient convenience expenditure required to support the turnover of the proposed convenience floorspace. Similarly, the comparison and food and beverage expenditure potential of the new residents significantly exceeds that required to support the proposed floorspace.

6.5.12. In total, the proposed housing is expected to generate some £17.69m in new retail expenditure, which is almost three times more than the expenditure required to support the proposed floorspace (£8.18m). This indicates that the retail floorspace is of an appropriate size and scale for the development proposed and that it will largely support the proposed floorspace without impacting nearby centres to a significant extent. Indeed, it is expected that other surrounding retailers and businesses will benefit from the increased residential population in this location.

FINDINGS BASED ON THE LBIRLS 2017

6.5.13. As the LBIRLS 2017 provides the latest available market shares and shopping patterns evidence for this catchment, our impact assessment must be underpinned by its data.

6.5.14. As previously noted, the site lies at the southern end of Zone 5, and a 10-minute walking catchment would also extent into parts of Zones 3 and Zone 7.

6.5.15. Table 3, 4 and 5 examine the population and expenditure potential of the relevant zones of the LBIRLS 2017.

6.5.16. Table 3 estimates a population of 134,908 within the three zones at 2026. Using the same per capita expenditure figures as adopted by the LBIRLS 2017 (Table 4), it is estimated that there will be a total available convenience expenditure of £285m in 2026, an increase of £13.7m from 2021. The total convenience turnover of the proposal, £4.53m, represents around one-third (33%) of this growth but in any case, will generate a significant amount of additional convenience expenditure through its co-located housing. It is, therefore, unlikely to draw significantly on this expenditure growth to support the new facilities.

6.5.17. Similarly, with respect of comparison expenditure, Table 5 further estimated that there will be some £439m of comparison expenditure by 2026, a growth of £77.1m from 2021. Even without the new housing, the proposed floorspace would require less than 1% of that expenditure to support it.

6.5.18. The estimates based on the LBIRLS 2017 figures do not include the expenditure generated by the proposed housing development, or indeed of the approved and potential housing that could be accommodated on nearby site allocations discussed in the previous Section. It is particularly relevant that the proposed floorspace is of an appropriate scale for its housing context and that it can be supported by the expenditure generated by the proposed housing and the growth in expenditure anticipated within the local area. This confirms the proposed floorspace is of a size and scale that is consistent with the local and everyday needs of the nearby catchment and the proposed resident population and that it is unlikely to have a significant impact on existing facilities and centres.

CONVENIENCE TURNOVER OF EXISTING STORES/CENTRES

6.5.19. Table 7 outlines the turnover of existing stores at 2026 based on the market shares derived from the LBIRLS 2017 (Table 6).

6.5.20. Table 7 reveals three particularly dominant foodstores within this catchment. The Sainsbury's store on Liverpool Road in Angel/Upper Street town centre (£83.8m), and the Morrisons (£75.1m) and Waitrose (£84.6m) stores in Nags Head town centre have 2026 turnovers which far exceed any other store within the catchment.

6.5.21. Of note, the Sainsbury's store is attracting about 20% from Zones 3, 5 and 7; while the Morrisons and Waitrose store, located in the proximate Nags Head town centre, attract higher proportions of around 36% and 50% respectively. This reflects the typically widespread distribution of expenditure within London.

6.5.22. Overtrading is not taken into account in the LBIRLS 2017, rather it only identifies capacity based on expenditure growth. We consider that it is appropriate to take into account significant over or under-trading in the assessment of capacity and impact. In this instance, the trading figures of the abovementioned stores appear extraordinarily high and as such, we have estimated their likely trading performance at Table 8, Appendix C.

6.5.23. Our estimates indicate that the three stores are each substantially overtrading; collectively in the order of £120m. The two stores within Nags Head town centre, Morrisons and Waitrose, are overtrading by circa £33m and £51m respectively. This very substantial over-trading provides a clear indication of a demand for more convenience floorspace within the local catchment.

6.5.24. The results of Table 7 indicate that Nags Head town centre will have a convenience turnover of £210.1m in 2026. As shown in our impact tables below, we do not estimate material levels of diversion from any other centre identified by the LBIRLS 2017.

COMPARISON TURNOVER AND TOTAL TURNOVER OF EXISTING STORES/CENTRES

6.5.25. The comparison turnovers of the centres within Islington are shown in Table 9. These turnovers are taken directly from Appendix 7 of the LBIRLS 2017.

6.5.26. The comparison turnover of Nag's Head Town Centre is estimated to be £181m at 2026.

6.5.27. Using floorspace data taken from the latest Goad Centre report, there is some 19,130sqm (gross) comparison goods floorspace within Nag's Head[1] town centre. Allowing for a robust net:gross ratio of 70% and applying the 2026 comparison floorspace sales density assumed by the LBIRLS 2017 (£7,356/sqm), this suggests that the benchmark turnover for comparison goods floorspace in Nag's Head Town Centre would be £98.5m in 2026.

6.5.28. Our figures indicate that the survey derived turnover will be £181.0m, indicating a substantial overtrading of some £82.5m. Again, this level of overtrading is material to the consideration of capacity for, and impact of, new floorspace. It clearly points to a demand for additional floorspace.

6.5.29. Table 10 combines convenience and comparison turnovers to estimate total turnovers at 2026. Of relevance, the total turnover of Nag's Head Town Centre at 2026 is estimated to be £391.1m.

CONVENIENCE AND COMPARISON IMPACT

6.5.30. Table 11 assesses the convenience and comparison impact of the proposals.

6.5.31. We have assessed two scenarios. Table 11A takes account of the fact that up to 50% of the turnover of the floorspace could be new expenditure generated by the proposed housing on the former Holloway Prison Site. Therefore, the impact assessment assesses the impact of the diversion of the remaining 50% of the estimated turnover. We consider that this is a robust assessment, as the proposed housing will in fact generate more than sufficient expenditure to support 100% of the proposed floorspace.

6.5.32. Table 11B assesses a worst-case scenario impact, whereby 100% of the estimated turnover is diverted from surrounding centres.

6.5.33. Table 11A shows that, given the nature and scale of the proposed floorspace, and the proximity of Nag's Head Town Centre, the convenience and comparison impact will predominantly fall on Nag's Head Town Centre. Our assessment expects up to 70% of the convenience and comparison diversion impacts will fall on Nag's Head Town Centre. Only minor diversion is anticipated from other centres, and we have assessed the impact on the basis that 7% of the convenience turnover of the proposed floorspace is diverted from Archway, 5% from Angel/Upper Street and 3% from Kentish Town. Our assessment further anticipates 8% of convenience turnover is diverted from centres elsewhere (such as centres dispersed through Central London and other Boroughs) and up to 7% is diverted from nearby local shopping areas.

6.5.34. Comparison diversion estimates also anticipate that the majority of the impact will fall on Nag's Head Town Centre, with minor diversions from 'Elsewhere' (including Central London) and, at worst case, up to 10% from the Local Shopping Areas.

6.5.35. The total impact of the proposed diversion on Nag's Head Town Centre is estimated at 0.6%. This is an insignificant level of impact for this strongly performing centre.

6.5.36. The minor diversions from each of Archway, Angel/Upper Street and Kentish Town will similarly result in an impact of less than 1% on each. Again, this level of impact will be negligible, and indeed is likely to be imperceptible.

[1] Nag's Head town centre is covered by the Holloway Goad Plan/Centre Report. Latest survey date 15.02.21.

6.5.37. The impacts on centres 'elsewhere' such as those throughout Central London is difficult to quantify as it is highly likely that this will be widely dispersed depending where residents work or study or otherwise tend to pick up their convenience needs. In any case, a total combined diversion of £0.33m will not cause significant adverse impact when distributed widely.

6.5.38. Similarly, the turnovers of the LSA's are not readily estimated due to limited information on their size and turnover potential. They are also not reliably recorded by household survey results. We have estimated that there will be a diversion of £0.30m in total from LSAs. In our view, this impact is most likely to fall on the larger LSAs including Brecknock Road and Caledonian Road, where comparable facilities are already located. Notably, both centres include multiple convenience stores and Brecknock Road provides a wide range of specialist convenience retailers such as butchers, bakers and grocers. The impact is unlikely to fall disproportionately on one retailer or one store and as such, the minor diversion is unlikely to result in significant adverse impact. Indeed, it is more likely that the increase in the local population as a result of the proposed housing will benefit nearby retailers. The impact on LSAs is considered in more detail below.

6.5.39. Table 11B makes the same assessment, using 100% of the estimated turnover. Table 11B shows that even allowing for 100% of the turnover of the proposed floorspace to be diverted from surrounding centres, the impact will still be very small. Impacts will remain low at circa 1% with the highest impact on Archway to be 1.7%, These are insignificant impacts which will not harm the established centres. This is a worst-case scenario assessment which, in our view, is neither realistic nor appropriate, as it, does not take any account of the new expenditure generated by the proposed housing as stated at paragraph 6.5.12.

IMPACT OF RETAIL SERVICE, LEISURE AND FOOD AND BEVERAGE USES

6.5.40. As previously noted, the new residential population is expected to generate around £4.55m in new food and beverage expenditure, which is four times the expenditure required to support the turnover of the food and beverage floorspace. Given the relatively small-scale nature of the proposed uses, and its role in catering to the needs of on-site residents and those visiting the Women's Building, it is improbable to suggest that this floorspace could result in a significant adverse impact on any other nearby centre.

6.5.41. Quantifying the impact of retail service uses is not typically undertaken for a number of reasons, but particularly because the widely varying range of uses that are included do not fall within an easily quantified 'average' sales density; and they are also more often independently operated, which means that they have varying thresholds that determine their viability. The provision of a hairdresser or beauty salon in this location is highly unlikely to unduly impact on any particular comparable service elsewhere given the extensive network of similar facilities across this part of London. Further, retail service and leisure uses (such as gyms or yoga studios) are regularly found in duplicates across other shopping areas and town centres which confirms their ability to attract their own custom despite the presence of similar operators nearby.

6.5.42. For these reasons, we have not quantified the likely impacts of the proposed retail service and leisure floorspace, but we are confident that the small scale of floorspace proposed will not result in significant adverse impact on any existing centre. Rather, it will support the needs of its new resident population and that of its visitors and immediately surrounding community.

6.6 SUMMARY OF IMPACT ASSESSMENT

6.6.1. This Section has considered the likely impact of the proposed Class E floorspace within the former Holloway Prison site redevelopment on nearby centres of Nag's Head and Kentish Town, and the nearby Local Shopping Areas. In accordance with the NPPF, it has considered potential impact on committed and planned investment in the catchment area; and potential impact on vitality and viability, including likely quantitative impact.

6.6.2. The results of the assessment confirm that the proposals are highly unlikely to result in significant adverse impact on any of the established centres within the catchment.

6.6.3. The quantitative impact on Nag's Head Town Centre is assessed to be 0.6%, and 0.8% or less for surrounding centres including Archway, Angel/Upper Street and Kentish Town Town Centre. These are very low levels of impact and are likely to be imperceptible. It will not result in significant adverse impact.

6.6.4. Our assessment identifies some diversion from other centres 'elsewhere' which recognises that Londoners have access to a very extensive network of stores and centres and are likely to divert trips from a very dispersed area, depending on where they work, study or visit regularly. The minor diversion estimated will not unduly impact any particular stores. Similarly, there is minor diversion anticipated from the nearby LSAs which is again difficult to quantify due to limited data and the fact that they are not reliably recorded within the household survey. The minor diversion is expected to come from a range of established facilities within the larger of the LSAs, where the most comparable facilities are located. The LSAs were found to be vital and viable, and the minor diversion is unlikely to result in significant adverse impact.

6.6.5. Finally, there is no evidence that the proposals will result in significant adverse impact on any committed or planned investment in the catchment area.

6.6.6. Therefore, it is concluded that the proposals will not result in significant adverse impact on the vitality and viability of any established centre, nor will it impact on planned or commitment investment.

7 CONCLUSIONS

7.1.1. This Main Town Centre Uses Impact Assessment has been prepared to support the planning application for the proposed redevelopment of the former Holloway Prison site in Islington. The proposals include the provision of up to 1,822sqm gross Class E floorspace to be provided across five units on the Camden Road frontage of the development; to meet the everyday and essential shopping and service needs of the new resident population; and to activate the street frontage and facilitate the integration of this previously fortified site with the community once more.

7.1.2. This Main Town Centre Uses Impact Assessment has demonstrated the suitability of the site for the proposed Class E floorspace, and that the proposal complies with local planning policy set out in the well-advanced emerging Islington Local Plan and the NPPF.

7.1.3. In particular, it has been demonstrated that there are no sequentially preferable sites which can appropriately accommodate the proposed floorspace and meet the same needs as the proposals. It has been further demonstrated that the proposals will not result in significant adverse impact on any existing centres within the catchment; on any committed or planned investment; and it will not result in significant adverse impact on vitality and viability.

7.1.4. Indeed, the proposed floorspace will be largely supported by its new resident population and it is an integral part of a well-designed redevelopment which offers significant benefits for the local community including the regeneration benefits of the re-use of a large, prominent and under-used site; significant local employment opportunities firstly, in its construction and subsequently, in the delivery of community and retail floorspace; and important social benefits from the delivery of affordable housing, a Women's Building, and the public garden (public park).

7.1.5. The NPPF highlights a presumption in favour of sustainable development. It has been demonstrated that the proposed Class E floorspace complies with local and national planning policy and will support the delivery of this important redevelopment site. This should be taken into account when all material considerations are weighed in the planning balance.

Appendix A

10 MINUTE WALKING CATCHMENT AREA

Holloway Prison Walking

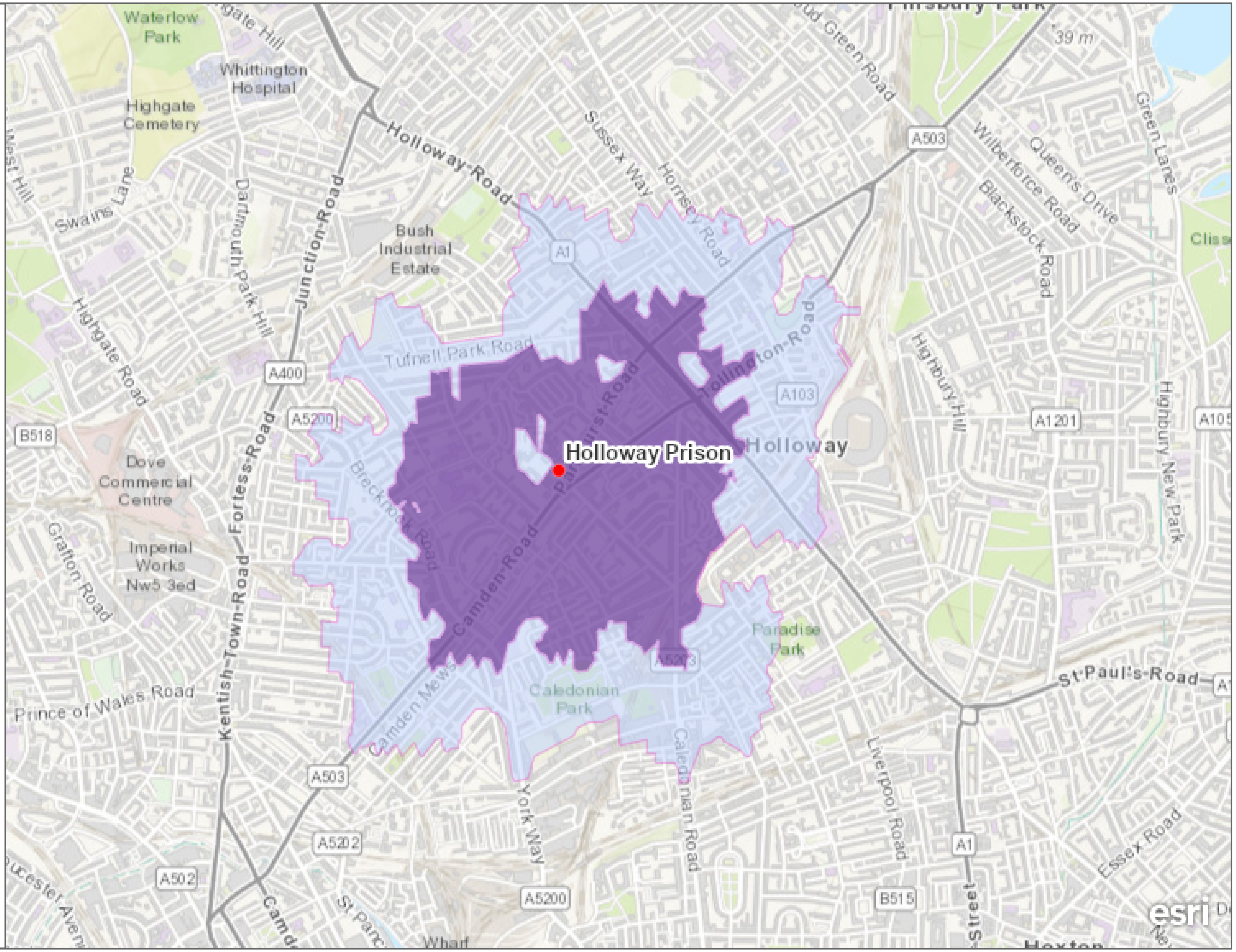
Holloway Prison

Travel from Holloway Prison (10 Minutes) - Walking

10.0 Minutes

Travel from Holloway Prison (15 Minutes) - Walking

15.0 Minutes



0.6km

Esri UK, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA

Appendix B

TOWN CENTRE HEALTH CHECK

Public

Town Centre and Local Shopping Area Health Checks

1.1 In order to gauge the impact of the proposed development, a detailed health check of the Nags Head Town Centre, Kentish Town Centre and Brecknock Road Local Shopping Area has been undertaken.

2.1 The health checks utilise the latest information from the Nag's Head Town Centre Strategy (2007) and the Camden Town Centre and Retail SPD. In addition to being supplemented by our own observations of the centres identified during site visits in September 2021.

3.1 Additionally, the health checks also utilise the latest data obtained from Experian Goad in relation to the composition of the centres.

4.1 We have assessed the health of the town centres against the health check indicators provided in the National Planning Practice Guidance, which provide a framework against which the vitality and viability of the town centre can be measured.

Nags Head Town Centre

5.1 Nag's Head is one of the largest retail destinations in the London Borough of Islington and in terms of retail hierarchy it is defined as a "Major Town Centre" in Islington's Development Plan. Islington's spatial strategy sets out that the council will:

> *"Continue to focus and promote a mix of retail along the main 'high streets' of Holloway Road and Seven Sisters Road to provide a better range of shops. The permanent and event-focused markets in the town centre will continue to play an important part in the retail offer."*

6.1 The Primary Shopping Area is focussed along Holloway Road and Seven Sisters. In addition, this centre includes the Nag's Head Shopping Centre, a relatively small indoor shopping mall which comprises national retail stores including Morrisons and a Selby's Department store. The shopping centre also includes smaller departments stores comprising a jewellers, a hairdressers and also a household goods store. The wider Town Centre comprises a variety of both independent and national retailers. National retailers include but not limited to; Superdrug, Poundland, Peacocks, Clarkes Shoes and B&Q.

7.1 Using the centre boundary as identified by Experian Goad, identified a total of 270 units. This figure has since changed, as identified in Table 1 below.

Table 1 – Nag's Head Town Centre

Number of Units	
February 2021 (Experian Goad data)	**September 2021 (Visit to centre)**
270	264

8.1 The table above identifies an increase in the number of occupied units in the city centre. As recorded on site, new business including restaurants, betting shops, cafes and furniture stores occupied vacant units identified within the Goad data.

<u>Overall Composition</u>

9.1 Table 2 outlines the composition of the centre, comparing GOAD data from February 2021 and data obtained during our site visit in September 2021.

Table 2 - Composition of Nag's Head Town Centre

Goad Category	Units (No. February 2021)	Units (%) (February 2021)	Units (No.) (September 2021)	Units (%) (February 2021)	2021 UK Average (%)
Convenience	33	12.2%	35	13.25%	9.1%
Comparison	46	17.04%	50	18.9%	27.4%
Retail Services	15	5.56%	15	5.68%	15.6%
Leisure Services	126	46.67%	132	50%	24.5%
Financial & Business Services	20	7.4%	20	7.57%	9.2%
Vacant	30	11.1%	12	4.5%	13.9%
Total	**270**	**100%**	**264**	**100%**	**100%**

Leisure services make up the majority of the commercial offer in Nag's Head. The centre offers a diverse range of cafes, restaurants, fast-food takeaways, beauty salons and barbers and comprises predominantly national operators, but also a number of independent stores and services.

<u>Convenience</u>

10.1 The convenience retail offer is identified to have increased from 12.2% in February 2021 to 13.25 % in September 2021. It stands above the national average of 9.1%

11.1 Convenience provision includes supermarkets, convenience stores and newsagents, tobacconists, confectioners, bakers, grocers and health food stores. National retailers include Iceland, Tesco (Express), Morrison's, Waitrose and Sainsbury's Local. Additionally, Nag's Head Shopping Centre located on the lower mall, comprises a range of convenience goods operators.

<u>Comparison</u>

12.1 As identified in February 2021, the comparison goods offer accounts for 17.04% of the centre's commercial offer. This is just well under the UK average of 27.4% and represents a decrease in comparison units from September 2021.

13.1 The centre comprises a number of discount / lower-end retailers and higher-end national retailers in addition to a mix of national and independent retailers and thereby has a diverse comparison goods offer.

14.1 Major national retailers include but are not limited to Selby's department store, B&Q, Poundland Discount Store, Peacock's clothing. Other national retailers present include but are not limited to, Clarks Shoes and Vodafone.

15.1 Independent comparison units include, but are not limited to, florists, hardware stores, charity shops and various units within the market on the lower mall level of the Nag's Head Shopping Centre.

<u>Services</u>

16.1 Service units (retail, leisure and financial and business) comprise 63.25% of the total retail provision in Nag's Head Town Centre.

Retail services

17.1 There are 15 retail service units in Nag's Head (5.68%). This is below the national average of 15.6%. The provision comprises a high number of hair and beauty salons which indicates a lack of diversity within this sector but is not of concern. Other uses include opticians, phone repair shops, a post office and more.

Leisure services

18.1 Nag's Head has a leisure services offer which accounts for 50% of the centre (132 units), which is significantly above UK average of 24.5%. The centre has a diverse range of bars, pubs, restaurants, cafes and takeaways and is considered to be provide a reasonable representation of evening economy uses.

19.1 Overall, the leisure facilities available provide a strong evening economy offer, including bars, restaurants and a cinema. These add to the night-time offer and activity within the centre.

Financial and business services

20.1 The financial and business services offer makes up 7.57% of the centre (20 units). This falls below the UK averages of 9.2% and suggests a slight under-representation in the provision of services within the Town Centre.

<u>Vacancies</u>

21.1 Nag's Head Town centre comprises 12 vacant units. This represents 4.5% of the centre which is below the national average of 13.9%. The number of vacant units is lower than those identified in the GOAD data from February 2021.

22.1 The centre had relatively high vacancy rates during the pandemic as identified in the Goad data. However, the reduction in vacant units as identified during the site visit suggests that the centre is starting to recover. It is positive that new retailers are occupying units within Town centre.

<u>Non-Retail Uses</u>

23.1 The centre comprises a number of important, non-retail uses which add to the diversity, scope and attraction of the Town Centre as a destination. These uses include various offices, Youth Arts centre, and places of worship. These uses attract a wider range of users and visitors to the Town Centre which has beneficial flow-on effects for retailers and tenants of the commercial aspects of the Town Centre.

<u>Pedestrian Flows</u>

24.1 There were moderately high levels of pedestrian activity throughout key areas of the centre during the time of our visit (12:00pm to 15:30pm). The centre was busiest around the Nag's Head Shopping Centre and around Seven Sisters in particular. These areas likely draw the highest levels of footfall as they comprise the greatest concentration of services and facilities as well as restaurants. Furthermore, the time of visit was around lunch time and therefore many people congregated in this area to eat.

25.1 Some areas of the centre were notably quieter (ie Tufnell Park, Parkhurst Road, as well as the end of the Holloway Road closest to Manor Gardens). It is likely that these areas were quieter as they comprise less retail service uses or comprise uses which cater for the evening economy which were not open at the time of the visit.

Accessibility

26.1 Nag's Head Town Centre is easily accessible by both public and private modes of transport and the whole centre has a PTAL rating of 6a which is very good. There are a number of bus stations located along Holloway Road, including Tollington Road (Stop S), Seven Sisters Road (Stop G) as well as Tufnell Park Road (Stop E). Holloway Road is easily accessible by foot from the main retail areas. There are a number of Tube Stations located within the site's immediate vicinity, providing direct access to central London as well as to outer London areas

27.1 Kentish Town Station is located approximately 2km, or 25 min walk or short bus trip, to the central park of the centre. It is a Northern Line service providing access to north and south parts of London. Tufnell Park is located approximately 1.5km from the centre and also a Northern Line service. Furthermore, Caledonian Road is located 1.7km from the centre and is a Piccadilly Line service and also has an over ground station.

28.1 The centre is also easily accessible via private vehicle. Holloway Road joins onto A1, which provides access to the A406 and the M1.

29.1 Based on the above, Nag's Head is easily accessible by both public and private transport modes.

Perception of Safety

30.1 The perception of safety throughout the centre, at the time of the visit, was varied. Throughout the key shopping areas there was a strong sense of safety, largely due to the regular footfall in these areas and active frontages, both providing natural surveillance and the sense of security. However, there were a number of streets where pedestrian flows were low, and natural surveillance was very limited. This was largely due to a concentration of uses which are open in the evening only. In these areas, the perception of safety decreased.

Environmental Quality

31.1 The Town Centre's environmental quality was average. The centre lacked well-maintained areas of public realm and there were limited seating options available. Furthermore, there were areas that were not clean and it was evident that refuse had over spilled bins and collated on the pavement.

32.1 The centre comprises historic buildings and a mix of other styles. Facias and shopfronts were reasonably well maintained in the busier shopping areas, however, there were areas of the centre in which included units that were run down and were in poor condition.

Conclusion

33.1 In conclusion, Nag's Head Town Centre has a good and popular comparison and convenience offer. In particular, Nag's Head Town Centre has strong retail service units and new occupiers such as restaurant and café uses have located within a number of vacant units identified within the February 2021 Goad data. This shows that the centre is starting to recover following the COVID-19 pandemic.

Kentish Town Town centre

34.1 Kentish Town Town Centre is located to the north of Camden Town, within the borough of Camden and is the borough's third smallest centre. The Camden Town Centres and Retail SPD sets out that Kentish Town Town Centre:

> *"has a good convenience offer with four foodstores which are performing strongly. The centre is accessible and functioning reasonably well but could be improved in some key areas. The comparison retail offer in Kentish Town is more limited and could be improved. Some of the retail units are in need of improvement."*

35.1 The centre has a heritage interest borne from a number of historic buildings present and the centre comprises a mix of national and independent retailers, which are predominantly spread across the entire Town Centre.

36.1 Using the centre boundary as identified by Experian Goad, a total of 182 units were identified in March 2021. Table 3 below demonstrates that there has been no change in the number units identified in the town centre.

37.1

Table 3 - Units within Kentish Town Town centre

Number of units	
March 2021 (Experian Goad data)	**September 2021 (Visit to centre)**
182	182

Overall Composition

38.1 Table 4 outlines the composition of Kentish Town Centre, comparing GOAD data from March 2021 and data obtained during our site visit in September 2021.

Table 4 - Composition of Kentish Town Town Centre

Goad Category	**Units (No.)(Mar 2021)**	**Units (%) (Mar 2021)**	**Units (No.) (September 2021)**	**Units (%) (September 2021)**	**2021 UK Average (%)**
Convenience	25	13.7	25	13.7	9.1%
Comparison	31	17.0	32	17.6	27.4%
Retail Services	13	7.1	13	7.1	15.6%
Leisure Services	73	40.1	76	41.8	24.5%
Financial & Business Services	19	10.4	19	10.4	9.2%
Vacant	21	11.5	17	9.3	13.9%
Total	**182**	**100%**	**182**	**100%**	**100%**

Comparison

39.1 The 32 comparison units in Kentish Town Town Centre account for 17.8% of the town centre. This falls below the national average of 27.4% but is an increase from the number comparison units identified in March 2021 (17.2%).

40.1 National comparison operators include Poundland, Superdrug, Boots, Jewsons Building Merchant. Independent comparison retailers make up the majority of the comparison offer in the centre and include, but are not limited to, hardware retailers, charity shops, card shops and more.

41.1 The small number of comparison operators within the centre is reasonably diverse, but due to the small number of comparison units it is considered that overall, the offer is limited, and residents of the surrounding area would need to go elsewhere to fulfil all comparison shopping needs.

<u>Convenience</u>

42.1 Convenience retail accounts for 13.7% of the town centre (25 units). National convenience operators present are Iceland and the Co-Operative. Other convenience operators include a butcher, a bakery, and small convenience stores.

43.1 The provision of both a standard national supermarket (Co-Operative) and a discount supermarket (Iceland), in addition to smaller independent units indicated that the convenience needs of the surrounding population can be met within the centre.

<u>Services</u>

44.1 There is a reasonable service offer provided within the centre.

Retail services

45.1 The retail service offer comprises 13 units which account for 7.1% of the centre. This falls below the national average of 15.6%. Again, this is likely due to the number of vacant units in the centre. However, this offer is the same as in March 2021.

46.1 Services include opticians, dentists, hairdressers and beauty salons, bike repair services and more. The provision identified is relatively limited.

Leisure services

47.1 76 leisure service units were identified which account for 41.8% of the centre's provision. Leisure services include, pubs and takeaways, cafes, restaurants, betting offices, a casino and a bar. The leisure offer identified is relatively local and small-scale, however it does provide an evening economy in the centre.

Financial and business services

48.1 There are 19 financial and business services which represent 10.4% of the overall composition of the Kentish Town Town centre. This is above the national average of 9.23%. The offer predominately comprises estate agents but also includes a Lloyds Bank amongst others. However, there was a sign on the Lloyds Bank unit suggesting that the facility was closing down.

<u>Vacancies</u>

49.1 At the time of the visit in September 2021, 17 vacancies were identified in Kentish Town Town centre, representing 9.3% of the units within the town centre. Positively, this is lower than the national average of 13.9% and lower than the March 2021 Experian data.

50.1 The relatively low provision levels of vacant premises can indicate that the town centre is starting to recover following the COVID-19 pandemic. New retailers identified on the visit in September 2021 include, but not limited to, a bakery as well as beauty salons and hairdressers.

Non-Retail Uses

51.1 Non-retail uses include a library, places of worship, an advice centre as well as an emergency services depot.

Pedestrian Flows

52.1 Pedestrian flows were relatively busy throughout the town centre at the time of our visit but not overwhelming. This may be due to many people being in work at the time (9:30am – 11:30am), or many people may have remained out of the centre on the unusually hot day that we visited.

53.1 Pedestrian flows were highest near to Kentish Town Station and it appeared that many pedestrians were travelling to and from Iceland, the Co-Operative and other shops within this area of the centre. In particular, many people were also utilising the cafés closest to Kentish Town station as well as McDonald’s.

Accessibility

54.1 The centre is very accessible by both public and private transport modes and the entire centre has a PTAL rating of 6a. Kentish Town Road provides direct access into central London as well as to north London and the M1. There are several bus stops along Kentish Town Road which include Fortess Raod (Stop KJ), Kentish Town (Stop KB) and the Prince of Wales Road) Stop KM). All of which are located within a 15 minute walk of the centre.

55.1 Furthermore, Kentish Town station is located within the centre and is a Northern Line service providing easy access into the central London area.

56.1 Based on the above, Kentish Town Town Centre is highly accessible by both public and private transport modes.

Perception of Safety

57.1 The perception of safety at the time of the visit was good. Streets where pedestrian flows were highest appeared safe and provided substantial natural surveillance, also achieved through the active frontage provided by the centre’s commercial and retail units. Some streets to the edge of the centre to less frequented by pedestrians but nonetheless the town centre appeared safe.

58.1 It is anticipated that the perception of safety would decrease throughout a reasonable proportion of the centre in the evening, due to the lack of evening economy uses.

59.1 Furthermore, the perception of safety was further increased by the strong police presence within the centre as well as the emergency services depot located at the north end of the centre.

Environmental Quality

60.1 The environmental quality of the area was very good. Commercial and retail units were well maintained and offered an attractive retail frontage. The streets were very clean and street cleaners were present at the time of the visit and working. Overall, the environmental quality of the area was positive, attractive and the retail units were well-kept in the centre.

Conclusion

61.1 Kentish Town Town centre has a good convenience food offer, and it is considered that the presence of a national retailer store (the Co-Operative) and a discount food store (Iceland), amongst smaller independent stores, enables the centre to meet the convenience retail needs of the surrounding area.

62.1 However, it is anticipated that residents will need to go elsewhere to meet all of their comparison retail needs, specifically in terms of clothing. There is a limited clothing and fashion offer with the majority of the clothing stores being charity shops.

63.1 Estate agents comprised the majority of the financial and business services and although there was a Lloyds Bank present, it was noted that a sign on the unit was suggesting that the facility was closing down.

64.1 There were many restaurants and pubs present offering a good evening economy, however gaps in the provision include bars as well as bowling facilities or a cinema.

65.1 Nevertheless, it is considered that overall, Kentish Town Town Centre provides for the general needs of its nearby residents, and the reduction in the number of vacant units identified in September 2021 compared to March 2021 is positive and suggests that the centre is starting to recover from the COVID-19 pandemic.

Brecknock Road Local Shopping Area

66.1 Brecknock Road is a Local Shopping Area (LSA) within the London Borough of Islington. The area is located approximately 1.8km to the south west of the Nag's Head Town Centre and is defined within the Islington Development Management Policies (2013) document. It is, however, a relatively small area with commercial activity focussed predominantly around one street; Brecknock Road.

67.1 This centre is a local shopping centre and not a town centre and therefore, Goad data is not available. A visit to the LSA was undertaken in September 2021 and this data is compared to data obtained from Google Street View dated May 2021.

68.1 The centre, comprising 56 units, is predominantly comprised of independent retailers, but the number of units has remained the same since May 2021.

Table 5 - Units within Brecknock Road Local Shopping Area

Number of Units	
May 2021 (Google Street View)	**September 2021 (Visit to centre)**
56	56

Overall Composition

69.1 Table 6 overleaf outlines the composition of the centre, comparing data obtained during our site visit in September 2021 and Google Street View dated May 2021.

Table 6 - Composition of Brecknock Road Local Shopping Area

Goad Category	Units (No.)(May 2021)	Units (%) (May 2021)	Units (No.) (September 2021)	Units (%) (September 2021)	2021 UK Average (%)
Convenience	6	10.7	6	10.7	9.1%
Comparison	8	14.2	8	14.2	27.4%
Retail Services	4	7.14	4	7.14	15.6%
Leisure Services	29	51.8	29	51.8	24.5%
Financial & Business Services	1	1.8	1	1.8	9.2%
Vacant	3	5.3	3	5.3	13.9%
Total	**56**	**100%**	**56**	**100%**	**100%**

Convenience

70.1 The convenience offer in Brecknock road is appropriate for its size but is somewhat limited to only Londis convenience stores, but the centre also included an independent butcher. These six units account for 10.7% of the centre's total offer. This is marginally more than the national average of 9.1% and reflects the role of the centre. These units provide 'top-up' shopping in proximity to local residents.

Comparison

71.1 The comparison offer in the centre is also limited and comprises eight units, which equates to 14.2% of the centre, which is well below the national average, but again is reflective of its local role and function. The comparison offer extends to an office furniture store, a pharmacy, a picture shop, household DIY store and more.

Services

Retail services

72.1 There are four retail service operators in the centre. This is a relatively high representation of 7.14%, which is not unusual in smaller centres which have a localised role and function. The offer includes a dry cleaners, a post office, hairdressers and shoe repair shops.

Leisure services

73.1 There are 29 leisure service operators in the centre forming the largest proportion of the retail offer. These predominately consist of fast food takeaways as well as pubs, cafes, takeaways, and a gym.

74.1 The majority of the leisure services in the centre are only open in the evening. Therefore, the centre offers a good evening economy

Financial and business services

75.1 There is one financial service within the centre which is an estate agent.

Vacancies

76.1 Three vacant units account for 5.3% of the total number of units within the centre. This is lower than the national average of 13.9%.

Non-Retail Units

77.1 The centre does not comprise any non-retail units.

Pedestrian Flows

78.1 Pedestrian flows were relatively busy at the time of the visit, most likely due to the time of the visit coinciding with school closing times (15:00-16:00). Flows were strongest on the junction between Camden Road and Brecknock Road. Customers appeared to be primarily parking outside shops or very nearby, accessing the stores then leaving. There was a concentration of people outside the front of cafés due to seating arrangements being on the pavements.

Accessibility

79.1 The centre is accessible by both public and private transport modes and half of the centre has a PTAL rating of 3 and the half of the centre has a PTAL rating of 4.

80.1 The centre benefits from a number of bus stops located on Brecknock Road and these include Brecknock Road (Stop G). Catalonian Road station is located approxiamtley 1.4km and Kentish Town Station is located approxiamtley 0.6km from the centre.

81.1 The centre is also located within walking distance of a large residential population, and a pedestrian crossing is available across Camden Road, however the busy highway does not create a barrier to pedestrians through its dissection of the centre.

Perception of Safety

82.1 At the time of the visit, the centre had a relatively strong perception of safety, largely due to its small nature, wide streets and natural surveillance from people seating on the pavements outside cafés.

Environmental Quality

83.1 Brecknock Road’s environmental quality is relatively good. The areas benefit from wide set streets featuring attractive residential buildings.

84.1 However, some of the vacant units located at the far end to the west of the centre have run down shopfronts. These units have a negative impact on the aesthetic of the centre.

Conclusion

85.1 In conclusion, the centre has a small-scale retail offer that is commensurate with the role and function of a local centre. It provides a useful local top-up convenience shopping role as well as providing some local services and a small number of cafes and takeaways that are regularly found in centres of this size. It is accessible, and an attractive centre, though the vacant units provide a somewhat negative aesthetic.

Appendix C

RETAIL IMPACT TABLES

Table 1: Turnover of the Proposals 2026

	Floorspace sqm gross	Floorspace sqm net	Sales Density £/sqm	Turnover £m
Convenience	700	525	12,173	6.39
Comparison	150	105	7,356	0.77
F&B	225	158	4,500	1.01
Retail Service Uses	225	158		
Total	**1,300**	**945**		**8.18**

Notes

1. Convenience store sales density is based on an average of Sainsbury's, Tesco and Co-op sales densities from Global Data 2020, rebased to 2015 prices and grown to 2026 using floorspace efficiencies taken from RPBN18.
2. 2026 Comparison sales density taken from the LBIRLS 2017.
3. Food and beverage sales density is WSP estimate s.
4. A net:gross ratio of 75% is used for the convenience floorspace. A net:gross ratio of 70% is used for all other uses.

Table 2: Population and Expenditure Potential of New Development

2A: Population	2026
Dwellings	985
Persons per household	2.4
Population	**2,364**

2B: Expenditure Potential 2026	Per capita Expenditure £	Total Available Expenditure £m
Convenience	2,170	5.13
Comparison	3,390	8.01
F&B	1,923	4.55
Total		**17.69**

Notes:

1.Persons per household is based on ONS data

2.Convenience and comparison per capita expenditure figures are LBIRLS 2017 Zones 5 per capita expenditure estimates in 2026

3. Food and beverage per capita expenditure is based on the Zone 5 figure taken from Table 11.1 LBIRLS 2017

Table 3: LBIRLS 2017 Population Figures

	2021	2026
Zone 3 Holloway	29,384	31,009
Zone 5 Archway	47,179	49,199
Zone 7 Barnsbury	51,693	54,700
Total	128,256	134,908

Table 4: LBIRLS 2017 Per Capita Expenditure

Per Capita Convenience Expenditure

	2021	2026
Zone 3 Holloway	£1,975	£1,972
Zone 5 Archway	£2,173	£2,170
Zone 7 Barnsbury	£2,143	£2,141

Per Capita Comparison Expenditure

	2021	2026
Zone 3 Holloway	£2,623	£3,025
Zone 5 Archway	£2,939	£3,390
Zone 7 Barnsbury	£2,831	£3,265

Table 5: LBIRLS 2017 Total Available Expenditure

Total Available Convenience Expenditure (£m)

	2021	2026	Growth
Zone 3 Holloway	58.0	61.1	3.1
Zone 5 Archway	102.5	106.8	4.2
Zone 7 Barnsbury	110.8	117.1	6.3
Total	**271.3**	**285.0**	**13.7**

Total Available Comparison Expenditure (£m)

	2021	2026	Growth
Zone 3 Holloway	77.1	93.8	16.7
Zone 5 Archway	138.7	166.8	28.1
Zone 7 Barnsbury	146.3	178.6	32.3
Total	**362.1**	**439.2**	**77.1**

Notes:

1. Population and per capita expenditure Figures taken from Appendix 2, LBIRLS 2017

Table 6: LBIRLS 2017 Convenience Market Shares

	Main Food %			Other Main Food %			Top Up %			Other Top Up %			Total Food %		
	Zone 3	Zone 5	Zone 7	Zone 3	Zone 5	Zone 7	Zone 3	Zone 5	Zone 7	Zone 3	Zone 5	Zone 7	Zone 3	Zone 5	Zone 7
Angel/Upper Street															
M&S Foodhall, Liverpool Road	0.0%	0.0%	6.3%	0.0%	0.0%	4.3%	0.0%	0.0%	2.1%	0.0%	0.0%	0.0%	0.0%	0.0%	4.6%
Sainsbury's Superstore, Liverpool Road	0.0%	0.5%	14.9%	0.0%	5.2%	14.5%	0.0%	0.5%	3.0%	0.0%	0.0%	9.1%	0.0%	0.9%	11.9%
Tesco Metro, Islington Green	4.9%	0.0%	2.9%	0.0%	0.0%	3.8%	0.0%	0.0%	3.6%	0.0%	0.0%	0.0%	3.0%	0.0%	2.8%
Waitrose, Liverpool Road	0.0%	0.0%	6.7%	0.0%	0.0%	4.0%	0.0%	0.0%	2.5%	0.0%	0.0%	8.2%	0.0%	0.0%	5.8%
Other	0.0%	2.6%	2.1%	0.0%	0.0%	0.8%	7.4%	1.8%	8.0%	0.0%	0.0%	5.1%	1.5%	1.9%	3.4%
Nag's Head Town Centre															
Morrisons, Hertslet Road	40.4%	9.0%	23.5%	4.8%	16.4%	2.0%	9.1%	3.8%	15.1%	4.6%	1.2%	0.0%	27.0%	7.9%	17.3%
Waitrose, Holloway Road	23.3%	27.7%	7.3%	42.6%	2.7%	13.4%	9.7%	2.2%	5.6%	1.3%	2.7%	11.4%	20.3%	17.6%	7.8%
Other	4.3%	6.3%	8.1%	23.2%	4.0%	10.2%	28.7%	18.6%	15.2%	51.8%	33.3%	9.1%	15.8%	11.3%	9.9%
Finsbury Park															
Lidl, Seven Sisters Road	0.0%	0.5%	0.0%	10.2%	0.6%	0.0%	0.0%	0.5%	0.0%	20.2%	0.0%	1.0%	3.0%	0.4%	0.1%
Tesco Metro, Stroud Green Road	1.5%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%
Other	3.1%	0.3%	0.0%	0.0%	0.0%	0.0%	3.3%	0.5%	0.0%	0.0%	0.0%	0.0%	2.5%	0.4%	0.0%
Archway															
Co-op, Junction Road	0.3%	6.6%	0.0%	0.6%	1.6%	0.0%	0.0%	11.1%	3.6%	0.0%	4.4%	0.0%	0.3%	6.8%	0.7%
Iceland, Junction Road	0.0%	3.4%	0.0%	0.0%	2.7%	0.0%	0.0%	2.0%	0.0%	0.0%	4.7%	0.0%	0.0%	3.2%	0.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	2.0%	0.0%	0.0%	1.2%	0.0%	0.1%	0.5%	0.0%
All Other	2.3%	0.3%	13.3%	1.3%	1.8%	17.1%	37.0%	15.7%	39.3%	10.2%	13.6%	37.1%	9.9%	4.9%	21.3%
Internet	10.2%	8.7%	4.9%	0.0%	2.1%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.1%	5.4%	3.6%
Inside Borough	**90.3%**	**65.9%**	**90.0%**	**83.6%**	**37.1%**	**77.2%**	**95.6%**	**58.7%**	**98.0%**	**88.1%**	**61.1%**	**81.0%**	**90.5%**	**61.2%**	**89.2%**
Outside Borough	9.7%	34.1%	10.0%	16.4%	62.9%	22.8%	4.4%	41.3%	2.0%	11.9%	38.9%	19.0%	9.5%	38.8%	10.8%

Notes:

1. Convenience market shares taken from Appendix 4, LBIRLS 2017.

Table 7: LBIRLS 2017 Convenience Turnovers

	2021 Zone 3	2021 Zone 5	2021 Zone 7	2021 Other LBIRLS Study Area	2021 Total	2026 Zone 3	2026 Zone 5	2026 Zone 7	2026 Other LBIRLS Study Area	2026 Total
Angel/Upper Street										
M&S Foodhall, Liverpool Road	0.0	0.0	5.3	11.0	16.3	0.0	0.0	5.6	11.5	17.1
Sainsbury's Superstore, Liverpool Road	0.0	1.0	13.7	65.2	79.9	0.0	1.0	14.4	68.4	83.8
Tesco Metro, Islington Green	1.8	0.0	3.3	22.8	27.9	1.9	0.0	3.5	23.9	29.3
Waitrose, Liverpool Road	0.0	0.0	6.6	17.4	24.0	0.0	0.0	7.0	18.2	25.2
Other	0.9	2.1	3.9	24.2	31.1	1.0	2.2	4.2	25.2	32.6
Sub-total					*179.2*					*188.0*
Nag's Head Town Centre										
Morrisons, Hertslet Road	16.7	8.6	19.9	26.3	71.5	17.6	9.0	21.0	27.5	75.1
Waitrose, Holloway Road	12.6	19.1	8.9	40.2	80.8	13.2	19.8	9.4	42.2	84.6
Other	9.8	12.2	11.3	14.7	48.0	10.3	12.7	12.0	15.4	50.4
Sub-total					*200.3*					*210.1*
Finsbury Park										
Lidl, Seven Sisters Road	1.9	0.5	0.1	4.9	7.4	2.0	0.5	0.1	5.1	7.7
Tesco Metro, Stoud Green Road	0.6	0.0	0.0	19.8	20.4	0.7	0.0	0.0	20.7	21.4
Other	1.6	0.4	0.0	10.5	12.5	1.6	0.4	0	11.1	13.1
Sub-total					*40.3*					*42.2*
Archway										
Co-op, Junction Road	0.2	7.3	0.8	1.5	9.8	0.2	7.6	0.9	1.5	10.2
Iceland, Junction Road	0.0	3.5	0.0	2.3	5.8	0.0	3.6	0.0	2.4	6.0
Other	0.1	0.6	0.0	3.6	4.3	0.1	0.6	0.0	3.7	4.4
Sub-total					*19.9*					*20.6*
All Other	6.1	5.3	24.5		157.8	6.5	5.5	25.9		165.5
Total Islington Borough	**52.3**	**60.6**	**98.3**		**597.5**	**55.1**	**62.9**	**104.0**		**626.4**
Elsewhere	5.8	42.0	12.4		335.0	6.1	43.8	13.1		351.1
Total	**58.1**	**102.6**	**110.7**		**932.5**	**61.2**	**106.7**	**117.1**		**977.5**
Expenditure retained inside Borough	*90.0%*	*59.1%*	*88.8%*		*64.1%*	*90.0%*	*59.0%*	*88.8%*		*64.1%*
Expenditure leaking from Borough	*10.0%*	*40.9%*	*11.2%*		*35.9%*	*10.0%*	*41.0%*	*11.2%*		*35.9%*

Notes:

1. Convenience turnovers taken from Appendix 6, LBIRLS 2017

Table 8: Trading Performance of Key Stores

	Floorspace Net sales (sqm)	Sales Density £/sqm	Benchmark Turnover (£m)	Turnover 2026 £m	Over-trading £m
Sainsbury's Superstore, Liverpool Road	3,916	12,297	48.54	83.80	35.26
Morrisons, Hertslet Road	3,147	13,074	41.48	75.10	33.62
Waitrose, Holloway Road	2,359	13,782	32.77	84.60	51.83
Total					**120.71**

Notes:

1. Convenience floorspace estimated by WSP.
2. Sales densities taken from Global Data 2020, allowing for floorspace efficiencies to 2026.

Table 9: LBIRLS 2017 Comparison Turnovers

	2021					2026				
	Zone 3	Zone 5	Zone 7	Other LBIRLS Study Area	Total	Zone 3	Zone 5	Zone 7	Other LBIRLS Study Area	Total
Angel/Upper Street	1.7	7.2	28.0	143.3	180.2	2.1	8.6	34.1	173.5	218.3
Nag's Head Town Centre	35.9	24.7	33.5	55.2	149.3	43.8	29.7	40.8	66.7	181.0
Finsbury Park	0.4	0.6	0.2	9.4	10.6	0.5	0.8	0.2	11.4	12.9
Archway	0.5	2.9	0.0	1.4	4.8	0.6	3.5	0	1.7	5.8
All Other	0.1	0.0	4.2	16.7	21.0	0.1	0.0	5.1	20.2	25.4
Total Islington Borough	**38.7**	**35.5**	**65.8**		**365.9**	**47.1**	**42.7**	**80.3**		**443.4**
Elsewhere	38.4	103.2	80.6		872.1	46.7	124.1	98.3		1055.5
Total	**77.1**	**138.7**	**146.4**		**1238.0**	**93.8**	**166.8**	**178.6**		**1498.9**
Expenditure retained inside Borough	*50.2%*	*25.6%*	*44.9%*		*29.6%*	*50.2%*	*25.6%*	*45.0%*		*29.6%*
Expenditure leaking from Borough	*49.8%*	*74.4%*	*55.1%*		*70.4%*	*49.8%*	*74.4%*	*55.0%*		*70.4%*

Notes:

1. Comparison turnovers taken from Appendix 7, LBIRLS 2017.

Table 10: Total Turnover by Centre

	2021			2026		
	Convenience	Comparison	Total	Convenience	Comparison	Total
Angel/Upper Street	179.2	180.2	359.4	188.0	218.3	406.3
Nag's Head Town Centre	200.3	149.3	349.6	210.1	181.0	391.1
Finsbury Park	40.3	10.6	50.9	42.2	12.9	55.1
Archway	19.9	4.8	24.7	20.6	5.8	26.4
Kentish Town	33.1	25.5	58.6	35.1	29.6	64.7

Notes:

1. Table 7 and Table 8.

2. Turnovers for Kentish Town have been taken from LB of Camden Retail and Leisure Study 2013, Appendices 2 and 3, with turnovers grown for 2021 and 2026 and rebased to 2015 prices.

Table 11: Trade Diversion and Impact of Retail Floorspace at 2026

Table 11A	2026 Turnover	Convenience Diversion		Comparison Diversion		Impact
	£m	%	£m	%	£m	%
Angel/Upper Street	406.3	5.0%	0.16			0.04%
Nag's Head Town Centre	391.1	70.0%	2.24	70.0%	0.27	0.6%
Archway	26.4	7.0%	0.22			0.8%
Elsewhere (incl Central London)		8.0%	0.26	20.0%	0.08	
Local Shopping Areas		7.0%	0.22	10.0%	0.08	
Kentish Town	64.7	3.0%	0.10			0.1%
Total		**100.0%**	**3.20**	**100.0%**	**0.39**	

Notes:

1. Assesses impact on the basis of 50% turnover of the proposed floorspace. It is assumed that the other 50% will be new expenditure generated by the proposed housing.

Table 11B	2026 Turnover	Convenience Diversion		Comparison Diversion		Impact
	£m	%	£m	%	£m	%
Angel/Upper Street	406.3	5.0%	0.32			0.08%
Nag's Head Town Centre	391.1	70.0%	4.47	70.0%	0.54	1.3%
Archway	26.4	7.0%	0.45			1.7%
Elsewhere (incl Central London)		8.0%	0.51	20.0%	0.15	
Local Shopping Areas		7.0%	0.45	10.0%	0.04	
Kentish Town	64.7	3.0%	0.19			0.3%
Total		**100.0%**	**6.39**	**100.0%**	**0.77**	

Notes:

1. Hypothetical assessment which considers if 100% of turnover was drawn from surrounding centres.

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