



OUTER LONDON COMMISSION

THIRD REPORT

JULY 2014

LONDON PLAN 2011
IMPLEMENTATION FRAMEWORK

MAYOR OF LONDON

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The Commission would like to thank those who contributed to this document by attending the various meetings held in outer London as well as providing representations on the issues.

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FOREWORD

Dear Mayor

Third Report of the Outer London Commission

You asked the Outer London Commission to provide detailed advice on five key issues you felt were particularly pertinent to outer London.

These were:

- The challenges and opportunities town centres face in light of changing consumer expenditure, in particularly the impact of multi-channel shopping;
- The housing potential of town centres;
- Managing the night time economy in town centres;
- The development potential of large sites;
- Improving the offer of London's industrial estates.

As a result of a contraction in the projected growth in demand for comparison retail floor space combined with the other changes to retail activity, including the need for qualitative improvements to the stock, and consumer behaviour such as multi-channel retailing, town centres will become polarised. Major new growth in retailing provision will be attracted to the larger, stronger centres and whilst local parades will remain buoyant, the other centres are likely to experience a significant contraction in their retail floorspace. In response to this, the Commission firmly believes that many of the town centres in outer London will need to reinvent themselves by diversifying their offer to include a mix of uses which better reflect changing needs, including employment, leisure, social and community facilities as well as new retail formats and housing.

For many medium sized centres, the mechanism to achieve this and also address what is arguably London's most pressing challenge, its need for more housing, is planned, high density, housing led, mixed use redevelopment. This will provide an opportunity not just to make a significant contribution to meeting the needs of smaller households (who constitute a major element of household growth) but, where viable, also enable provision of modern ground floor units for a broader range of activities and scope to improve the street environment in response to the new range of town centre uses.

In terms of increasing the development potential of large sites, the Commission believes it is imperative that the public sector undertakes a more proactive enabling role in helping to bring forward these sites, particularly in relation to investment in infrastructure and difficult sites. A detailed understanding of viability issues and the development process is crucial.

London industrial estates are hugely important in outer London. The Commission has set out a number of key issues and recommendations to help improve their offer, including environmental quality, security and intensification.

The Commission's report is the culmination of an ongoing process of engagement and analysis over the past 12 months which informed the development of policy for the draft Further Alterations to the London Plan. In submitting the report, the Commission would like to thank the boroughs, businesses, voluntary groups, and individuals who have made representations to it. Their contributions have been immensely important to the work of the Commission.

Yours faithfully,

Will McKee CBE
Chair of the Mayor's Outer London Commission



CHAPTER 1

INTRODUCTION

Introduction

1.0.1 Following on from the Outer London Commission's first and second reports and the recommendations stemming from these, the Mayor asked the Commission to reconvene to address several key issues facing outer London. Recommendations based on the Commission's analysis of these issues have been used to inform preparation of Further Alterations to the London Plan and the finalisation of the Town Centres Supplementary Planning Guidance (SPG). These issues included:

- How the planning system should respond to the long term challenges and opportunities facing London's town centres, especially the likely significant reduction in the level of growth in demand for retail floorspace; the impact of internet and multi-channel shopping; substantial projected population growth, including its implications for housing; continued employment growth and the more general need to support recession recovery.
- Identification and development of mechanisms to increase the housing potential of outer London's town centres, complementing the Commission's previous advice on housing densities in more suburban areas, detailed guidance on housing quality and the general direction of travel for future growth outlined in the Mayor's 2020 Vision.

- Updating, and making more relevant to Outer London, guidance on improving and managing the night time economy as indicated in the draft Town Centres SPG
- Provide detailed guidance on how to more effectively bring forward for housing and other development the substantial stock of brownfield land in parts of outer London, drawing on independent research into the 'barriers to delivery of housing' and the Mayor's 2020 Vision, not least to meet what is likely to be a major increase in London's housing requirements.
- Realising the potential and improving the offer of outer London's trading estates and other areas of industrial land, taking into account the approach currently outlined in the 2011 London Plan and associated Land for Industry SPG, and the general direction for future economic growth outlined in the Mayor's 2020 Vision.

1.0.2 Between August and November 2013 the Outer London Commission met in public in each of the four outer London sub regions to seek the views of outer London boroughs, businesses and stakeholders on how best to address the Mayor's request. Drawing on the emerging themes arising from these meetings, the Commission's work fed directly into the draft Further Alterations to the London Plan published by the Mayor for public consultation in January 2014. This report sets out the Commission's recommendations to the above issues on the basis of written submissions and discussions in each of the sub regional meetings and subsequent research and analysis.



UXBRIDGE TOWN CENTRE

CHAPTER 2

TOWN CENTRES AND RESPONSE TO CHANGING LEVELS AND PATTERNS OF CONSUMER EXPENDITURE

2.1 ISSUES/CONTEXT

Consumer expenditure projections

2.1.1 Retailing has a crucial economic and social role, employing 7.5% of people in London¹. It is a key provider of flexible employment opportunities, particularly for working parents and has a good record of providing training. In 2011 UK retail sales were worth £300 billion accounting for around 20% of the UK's GDP².

However, nationally less than half of retail spending in the UK now takes place on high streets³. Out-of-town retail space has been growing, increasing nationally by 30% in the last decade, while in-town space has shrunk by 14%⁴. Moreover, a report 'Beyond Retail' by a taskforce including Association of Property Lenders, British Council of Shopping, British Property Federation and the Investment Property Forum suggests that non-store sales (predominantly online) as a proportion of all retail expenditure have grown from under 6% in 2006 to 12% in 2013. This has been in both convenience and comparison retailing and now accounts for approximately £34 billion per annum⁵. This proportion is expected to continue to grow well into the 2020s when it is expected that online sales will capture about 28% of non-food sales and 20% or more of all retail expenditure⁶.

2.1.2 Not only are more people spending online, the amount each internet shopper spends online has also risen. The Policy Exchange highlights this phenomenon, stating that in 2006, 44% of the population spent money online which represented around 3% of total retail spending; by 2012 66% of people spent money online, generating 11% of total spending. A roughly 50%

rise in the proportion of shoppers purchasing online resulted in a near 400% rise in the share of retail spending online.⁷ With such a high number of transactions carried out online, retailers with a strong web offering now need on average just 70 high street stores to create a national presence compared to 250 in the mid 2000's⁸. It is not just comparison goods that are purchased online, people buying food online is also increasing, although currently it is still only around 3%⁹. In fact some retailers are entirely bypassing bricks and mortar altogether. Between 2008 and 2010 the proportion of retailers operating with online stores alone rose from 3.4% to 5.8%¹⁰.

2.1.3 In many places vacancies are creating a downward spiral, as closures reduce footfall, further weakening the high street and leading to yet more closures¹¹. Nationally shop vacancy rates have grown nearly fourfold since the beginning of 2008 from around 4% to a peak of 14.6% in early/mid 2012¹². They have now stabilised at 14.1%, although most commentators agree that this masks huge variations with larger shopping centres doing well but elsewhere one in four shops are vacant. By comparison with the rest of the UK, London is faring better, with half the vacancy rate of the national average. However the health of many of London's high streets is still fragile. According to London Assembly research, there are around 3,400 empty shops across the city, with the effect being felt most strongly in outer London, which has an outlet vacancy rate of 7.7%¹³. Evidence from the 2013 London Town Centre Health Check¹⁴ indicates that there is 450,000 sq.m of vacant retail floorspace in outer London town

centres which corresponds to a floorspace vacancy rate of 10%, compared to 9% in Inner London and 5% in the Central Activities Zone. Much of the space is vacant because it is not the type of space retailers want and/or is in centres with limited retail growth potential.

2.1.4 Research by Experian, published in 2013, suggests that projected growth in demand for comparison goods retail floorspace has abated compared to previous estimates, despite a doubling in the projected levels of population growth. The report confirms that although the London economy benefits from a growing population and a stronger economic outlook than most of the UK, the likely long term impact of government's 'austerity' measures and move towards multi-channel retailing means that considerably less additional retail comparison goods floorspace will be needed than was envisaged in previous estimates. In fact some 'brick and mortar' retailers are saying that town centres can no longer offer them the conditions they need in terms of cost, space, parking, etc to compete with online retailers. The study's authors suggest that rather than accounting for 14% of future comparison goods expenditure as anticipated in the 2011 London Plan, 'Special Forms of Trading', (of which internet shopping is by far the most important part), it is likely to expand by more than 20%.

2.1.5 Long term comparison goods retail expenditure growth in London is now expected to be about a half of what was estimated in the previous report but it is still expected to grow at +3% per annum from £18.566 billion in 2011 to £39.202 billion in 2036. As a result,

net demand for new comparison goods retail floorspace has declined from an additional 0.9 - 2.2 million sq m needed by 2031 as estimated in Experian's 2009 study (and the 2011 London Plan) to an additional 0.4 - 1.6 million sq m needed by 2036 in the more recent 2013 Experian study. This still represents a substantial quantum of growth albeit lower than previous estimates. Whilst one outer London borough stressed that it is unclear whether the reduced rate of growth in consumer-spend in town centres is cyclical (due to inflation and lack of available credit) or structural (not offering what the consumer wants), or both, most professional opinions strongly point towards it being structural. Because significant amounts of demand come from tourism and commuters, which have a significantly higher capital spend than residents, the 2013 Experian Study estimates that the centre of London (particularly the Central Activities Zone) will have a stronger need for this additional retail space.

2.1.6 Alongside this quantitative need for comparison retail floorspace there is also a substantial qualitative need for the right type of retail space in the right locations (see trends in polarisation below). Much of the retail stock in outer London is old and unsuitable for modern retailer and customer needs, including the lack of easily accessible and affordable parking, and does not provide the modern quality shopping outer Londoners deserve to enjoy. The need for supportive car parking provision is considered key where outer London is not well served by the public transport network, especially the tube.

Growth in on-line/multi-channel retailing

2.1.7 Multi-channel retailing is a retail strategy that offers customers a choice of ways to buy products other than just the traditional in-store environment. Whilst currently there is a modal shift in the use of internet shopping, the use of other technology such as mobile phones apps, tablets, telephone sales, mail order, interactive television and comparison shopping sites to purchase and delivery goods and services is revolutionising the way retailers combine their physical store requirements with their other retail offers.

2.1.8 Multi-channel retailing is transforming the way retailers are able to do business. Across the UK fibre broadband is being rolled out. This digital connectivity can enable retailers to reach a much wider market than before. The CBI highlights that this investment will help position the UK as a global leader in terms of the availability of high speed services by 2016. Although they raise concerns that only half of business users feel they are able to make the best use of this as a resource.

2.1.9 A significant feature of modern retailing has been the use of internet websites to conduct research before purchases are made. In the UK, pre-purchase internet searches are thought to occur in almost 50% of purchase decisions¹⁵. Many shops already have free wi-fi for tailored marketing, which also allows shoppers to read detailed reviews and compare prices, something that 33% of smartphone users are already doing¹⁶. With faster speed and capacity on smartphones through the launch of 4G, retailers can provide

m-commerce services with more flexibility than traditional e-commerce.

2.1.10 Retailers are recognising the importance of their physical stores matching the image portrayed online. A survey of European retailers found that more than two-thirds expected to launch a new format alongside or instead of their existing formats; this was highest in the UK¹⁷. Just over a quarter expected that their stores would become more about using products than simply displaying them. In addition, nearly a fifth felt that by 2015 their stores might have available screens showing clothing or accessories being worn by the potential purchaser with the option to change the colour or fabric without having physically to try on different garments as well as having the possibility of downloading the results to a cameraphone so that the pictures could be sent to friends before buying, possibly through social media such as facebook¹⁸.

2.1.11 Many businesses are also equipping their staff with iPads or installing kiosks to allow for easy in-store customer ordering¹⁹. The functions of these screens, kiosks and tablets are to provide customers with information to enable them to order products, either for collection in-store or delivery via the internet. Different types of payment methods are already being used by more and more shops with contactless payment such as keyfobs and tags and phone-enabled contactless payment being popular in the UK²⁰, particularly with the advantage of 4G allowing mobile retail to grow further in the coming years. In the future, technology may also allow local stores to use face recognition for payment²¹.

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- 2.1.12 Retailers are also considering ways in which technology may be used to give customers promotional information to encourage them to use their physical stores such as the provision of convenient click and collect facilities. For example Amazon has an agreement with the Co-operative to locate self-service lockers' in local stores. Likewise, eBay has struck a deal with Argos to host collection points in 150 of their stores²². John Lewis has already launched a service that allows customers to collect their order from one of 1,500 local Collect+ shops, so customers start their shopping online and finish it in the town centre, which creates additional footfall. Other innovative ideas for the future include click and collect at transport hubs and one-drop shopping, where for example individuals browse a high street and note what they wanted in different shops, but order it and have it delivered at a later date in a one-off package²³. Consumers could physically see the goods but would not need to worry about transporting them home. This would then let retailers know if people were making decisions about what to buy using their physical stores, which might justify keeping particular stores open even if online shopping was growing.
- 2.1.13 Pick-up points or delivery to self-service collection points can also encourage people into town to bring back unwanted goods. Ensuring these tasks can be undertaken conveniently; with readily available low priced short-term parking helps integrate town centres into the online shopping process²⁴. Town centres therefore need to market themselves as convenient hubs for collecting products ordered online.
- 2.1.14 Commentators such as Beyond Retail and The Grimsey Review, among others, promote the idea of town centres hosting websites as promotional and information platforms for retailers, advocating that this will become fundamental to restoring footfall, loyalty and spend in town centres. These platforms could be integrated with the provision of mentoring and advice on marketing, the use of social media and websites maximisation for independent retailers and small businesses. Companies like HighStreet13.com and Social Retail.co.uk currently provide an online learning platform and support for independent retailers wishing to improve their online presence and digital skills²⁵. Myhigh.st, which is supported by the British Independent Retailers Association, and Target 200 is an innovative e-commerce network that gives independent shopkeepers the chance to join together to sell their products online. It also gives towns a platform to showcase what is happening in their high street²⁶. Twitter has also been shown to be a valuable tool in promoting independent shops, events and in driving new footfall, assisting independents and SMEs which might not have the resources or skills required to take advantage of advancing technological capabilities.²⁷
- 2.1.15 Other marketing techniques that multi channel retailing may facilitate in the future includes apps or scanable QR codes and barcodes to help stores target shoppers for special deals and extra branded content on their mobile devices as they browse the shop. QR codes on shop windows can divert custom to a website outside normal opening hours, which is particularly useful for smaller
-

shops²⁸. In the future, dashboards could also be used to receive real time information about deals in town centres with accounts managed by a high street marketing manager²⁹. Pricing and deals could work on how many people there were in a high street at any one time. If it was quiet, the customer could be offered a better deal, an approach similar to that currently offered by companies like Easy Jet. Similarly if it was late at night, last minute deals for the day could be marketed. Such technology can even direct people to other services offered by the town centre such as a free parking space, something that Westminster is already pioneering a new app for. Future technology may also be able to identify people from an on-street face recognition account that they can opt into, which will alert key shops and services to the fact that an individual is coming, allowing them to prepare a tailored offer in store for that individual³⁰.

Competition from outside London

2.1.16 Some outer London boroughs point their main competition coming not just from neighbouring town centres within London but also from districts and towns beyond London. On a number of occasions these boroughs have had to object to proposals for significant increases in retail floor space in various schemes outside London's borders.

2.1.17 Regional shopping centres outside London such as Lakeside and Bluewater have major extensions plans within the pipeline. If these developments go ahead, they will increase the amount of spend flowing from London out to these centres. The town centres within Bexley, Bromley

and Havering will be most affected³¹. Many of the outer London boroughs welcome the Mayor's concerns over further intensification of these regional developments. They highlight mechanisms such as the Duty to Co-operate, in particular, becoming more important in discussions with neighbouring authorities.

Polarisation

2.1.18 It is evident that retailers will have to make clear strategic responses to the changing patterns of consumers' behaviour, including deciding the number, type and location of stores; and how to fully integrate their physical stores, online sites, and other channels such as social media in a coherent way. The reduction in the recent level of growth of demand for comparison retail floor space, as suggested by the GLA Experian Study 2013, combined with these other changes to retail activity and consumer behaviour, may well pose challenges to town centres in their current form. Many commentators such as Beyond Retail, The Grimsey Review, The Policy Exchange et al agree that market polarisation will ultimately lead to 3 types of town centres;

- strong dominant centres offering the widest range of retail, food and leisure uses, providing a rich consumer experience;
- convenience food and service based centres with an enhanced evening economy; and
- local convenience centres providing top-up shopping, supported by aging population, and time poor people.

2.1.19 In particular, retailers recognise that greater efficiency can be achieved by having a strategic network of large stores offering a full range of their products, rather than a network of smaller format stores which are able only to offer a limited range of products. Retailers are therefore downsizing their store portfolios and focusing on developing fewer but larger stores in the biggest retail destinations, allowing them to serve a larger population catchment. Evidence from Cushman & Wakefield suggests that 22% of retailers account for 75% of high street sales. As larger units are sometimes more difficult and more costly to accommodate within existing high streets and town centres, the stronger more dominant, more accessible centres are benefiting from this portfolio rationalisation and are therefore getting stronger, being able to provide a complete retail and leisure experience. This retailer demand for qualitative improvements to their stores explains why demand for space at recent major shopping centre openings, for example Westfield Stratford City, Shepherd Bush and soon Croydon, has been high, whilst demand for premises in small and medium-sized town centre locations has been weaker³². In addition, this polarisation trend is also driven by customers, who have become more discerning and are increasingly prepared to travel further afield. Availability of adequate free car parking can therefore influence the decisions of retailers in where to locate and the decisions of consumers on which centres to go shopping.

2.1.20 Local and neighbourhood centres offer convenience/everyday retail needs and top up shopping as well as other essential

services to local catchment population. Many trade well, often anchored by a supermarket convenience store. It is the middle ranking town centres, some of the major and most of the district centres in London, that are experiencing the worse effects of this polarisation; often leaking trade to the more dominant centres, having lost a number of multiples and anchor units during the recession. Retailers are increasingly focused on the prime retail pitches, with the secondary and tertiary pitches deteriorating. Historically, these middle ranking town centres would have had a reasonably large comparison shopping function. Now, demand from multiples is declining as often the space offered within these centres is too costly in terms of rents (particularly in primary shopping areas) and business rates, of the wrong size and configuration, and in the wrong location to meet modern retailer requirements and lacks cheap accessible parking³³. In secondary and tertiary areas, rents are typically much lower providing viable opportunities for SMEs and independents. However a minority of the outer London boroughs note that their district centres are performing well, with some seeing a clustering of restaurants and specialist retail.

Demand scenarios for comparison retail floor space

2.1.21 The Experian Report³⁴ produced for the GLA set out a number of scenarios for the future pattern of growth for London's town centres. These scenarios are as follows:

- Baseline - showing comparison goods floor space need associated with the

- existing London town centres as they are at present i.e. no change;
- Pipeline - if all known developments were to be built out;
- 4 nodes – which takes into account the existing patterns of retail, the pipeline developments and adds 4 significant nodes of development in each of the following retail centres - Brent Cross; Westfield London; Westfield Stratford and Croydon;
- 8 Nodes – which takes into account the existing patterns of retail, adds the pipeline developments, adds the 4 significant nodes of development (as above) plus an extra 4 significant development nodes - Uxbridge, Kingston upon Thames, Bromley and Romford;
- Quality Adjustment' Scenario - which takes into account the existing

patterns of retail, adds the pipeline developments then adds to the attractiveness of the International, Metropolitan and Major centres. This simulates an extension of the change in the patterns of shopping behaviour where a higher proportion of spend is being made at fewer larger and more attractive shopping centres and the smaller centres suffer relative decline.

2.1.22 A summary of Experian’s projected gross comparison retail floorspace demand for the baseline, pipeline and quality adjustment scenarios is provided in Figure 1.1. In the baseline scenario, outer London is shown as having a gross requirement of 750,000 sqm or 35% of the London total. When schemes in the planning pipeline are factored in the gross requirement falls to 450,000 sqm or 28% of the London total. The consultant’s quality scenario generates a modest uplift in the gross requirement in outer London. These scenarios all point to substantial

Figure 1.1 Gross comparison goods retail floorspace need scenarios (2013-2036)

	BASELINE		PIPELINE		QUALITY	
	SQM	%	SQM	%	SQM	%
Outer London	748,715	35	447,563	28	485,904	29
Inner London	443,779	20	218,891	14	223,555	13
CAZ	974,898	45	929,585	58	994,972	58
London	2,167,392	100	1,596,039	100	1,704,430	100

Source: Experian Business Strategies

quantitative retail need in London overall (although less than projected in the previous research that informed the 2011 London Plan). Combined with qualitative need for the right type of space in the right locations this will need proactive planning to accommodate growth having regard to the impact of polarisation and restructuring faced by London's centres.

2.1.23 Responses from the outer London boroughs showed a variety of views with no clear preference in scenarios. Although many acknowledged the "quality" scenario as best reflecting the current polarisation effect on town centres, a number of boroughs cautioned against focusing growth in a few selected town centres and favoured the distribution of new floor space more evenly across London. Clearly those boroughs with one of the retail centres identified in the node scenarios in their areas favoured those scenarios. What did come out very strongly from the outer London boroughs was the importance of maintaining the network of town centres, and that high streets at every level of the hierarchy fulfil an essential function in the community, providing locally accessible hubs for other key services as well as shopping.

Diversification and Specialisation of Town Centres

2.1.24 The reduction in growth of demand for comparison retail floor space, as suggested by the GLA Experian Study 2013, combined with other changes to retail activity and consumer behaviour outlined above mean town centres need to re-invent and re-imagine themselves to ensure they are resilient to possible

negative effects of polarisation. Research by UCL³⁵ indicates that the adaptability of high streets is central to their success. Many outer London boroughs stress the importance of maintaining the town centre network, highlighting that town centres must remain viable by developing alternative functions and attractions and promoting a more diverse range of new services and facilities alongside their retail core. It is recognised that there may need to be a consolidation of the primary retail areas into more focused cores and a contraction of secondary retail frontages. Many of the outer London boroughs strongly stress that this contraction needs to be managed in a co-ordinated manner if the town centre as a whole is to benefit.

2.1.25 Where demand for retail space contracts, there will be an opportunities to accommodate other uses and strengthen the town centre's existing role or develop a new role for the future. Some outer London boroughs note the important complementary role secondary frontages play. While, in principle, they are amenable to encouraging a controlled level of diversification to other uses, they also point out that this should be subject to certain criteria such as maintaining an active frontage during the day, visual impact, effect on the character of the centre, impact on traffic and parking issues and protection of the amenity of adjoining occupiers. This can be achieved by the promotion of uses other than retail. The Grimsey Review, Beyond Retail, and others stress the importance of town centres encompassing a complete community hub solution, which includes education, health, housing, arts, culture, leisure and viable employment uses as part of the mix. It is particularly important

for public services to remain and return to the town centre. Libraries, educational facilities, post offices, GP surgeries, and other public and community services are all important anchors bringing people to the town centre. A diverse mix of uses can enhance a town centre's offer, enabling greater use of the town at different times of the day, encouraging a wider range of people to use that centre. The multiple use of different spaces, for a variety of activities for community and cultural events within a town centre can also enrich its offer. Issues around enhancing the night time economy are discussed in Chapter 4.

2.1.26 Managing the contraction in retail space and developing opportunities for diversification can go hand in hand with realising the potential of town centres to help increase housing supply. The outer London boroughs acknowledge the important role of housing within town centres both in terms of the opportunities it provides for supporting mixed use development and for increasing the residential population of town centres which can help support retail and other services and facilities, so contributing to the town centre's vitality.

2.1.27 Boroughs raise concerns that the government's policy to allow the conversion of smaller retail units to residential in an uncontrolled manner could result in 'pepper potted' dead frontages which not only undermines viability and vitality of town centres but also compromises their potential to yield the higher increment to housing provision which can come from planned redevelopment. Further details regarding opportunities for increasing the housing

potential of town centres are discussed in Chapter 3.

2.1.28 In terms of retail mix, some of the outer London boroughs stress that in order to support and retain the metropolitan centres there may be a need for district centres to evolve to provide more emphasis on local services, niche and independent retailers as well as cafes, bars and restaurants and an enhanced night-time economy. This may include the provision of specialist retailing such as antique shops, farmer markets, electrical goods, jewellery etc. Particularly for major and district centres, some outer London boroughs also believe it is important that the town centres contain an appropriate level of multiple retailers to ensure sufficient footfall is generated to support the more independent retailers. However, others believe that generally these multiples do not show loyalty to an area in the same way as independent stores do; therefore centres that place a particular reliance on a national retailer for an anchor store are particularly vulnerable.

2.1.29 Research from Centres for Cities particularly highlights the importance of employment in the mix of uses in town and city centres. They assert that sluggish retail is the symptom of an underperforming city centre, not the cause of it. Apart from at the weekend where leisure activities account for the majority of footfall, in the week, apart from high education and tourism, the largest footfall is workers. Evidence from Cushman & Wakefield suggests that footfall from workers varies substantially depending on the status of the centre, citing 35% for Marylebone High Street,

28% for St Giles and 10% at Westfield Stratford, compared to the average for UK high streets of around 15–20%. The worry for medium and small town centres is that the decentralisation of private sector jobs in their economies has both reduced the size of the market that their high street retailers can sell to, and at the same time has left their central economies more reliant on retail. Retailing accounts for 16% of central employment in small cities, compared to 9 % in large cities and 5 % in London. Centres for Cities claims that it is those places where ‘economic capital’ is strongest that retail performs the strongest. Thus, focusing on retail to regenerate a city or town centre is unlikely to be successful if other measures are not put in place to increase footfall.³⁶

Retention of local employment

2.1.30 The retention of local employment is another important factor in the vitality of town centres. Town centres are important locations for small and medium enterprises and start-up businesses. Low threshold enterprise space (LTES), in particular, provides important capacity for start ups and small businesses which is of low cost but often poor quality and size. There is no pre-existing definition of low threshold enterprise space but it relates to the type of space rather than the type of occupier, and includes B uses as well as A and D uses and Sui Generis occupiers. It performs an important function as it enables small and, especially, new firms to benefit from proximity to London markets at more affordable rates. Occupational flexibility, such as not being locked into long leases and the ability to cluster are also important considerations for these types of businesses. They are

considered valuable future contributors to local economies because of their potential future performance, including employment growth and innovation and through their multiple effects. Providing jobs for local residents, in turn generates incomes, creating secondary income impacts through local expenditure and supply chains. As LTES is the lower value, non-prime, secondary and tertiary non-residential space which is found in and around town centres, it is more vulnerable to conversion or re-development to higher value uses such as residential³⁷.

2.1.31 It is also important to recognise the important role of other types of provision which help to provide workspace and support small and medium size enterprises such as incubators, accelerators and co-working spaces (IACs). An incubator supports the development of a new start-up or a business in the early stages of development. Accelerators support the development of businesses with significant potential for growth in output/employment. Co-working spaces provide a combination of workplace and supporting facilities at affordable rates with easy contractual conditions. The provision of these types of spaces is relatively new and the sector is highly dynamic and likely to undergo further evolution before maturing. This type of space is currently providing accommodation for between 2,700 and 4,000 business across London. Presently, they are mainly concentrated within inner London with significantly fewer in outer London. The main clusters are in areas where technological type firms are based. Good public transport is an essential factor in attracting IAC providers. There are signs of these clusters spreading outwards, with peripheral

activity identified beyond the cores of these clusters. If the trend of growing demand for this type of space continues then it may spread to outer London boroughs³⁸. Town centre renewal or the diversification of uses needs to consider the importance of this type of space for the future.

2.1.32 As with the uncontrolled conversion of smaller retail units to residential, there is also concern among the outer London boroughs that uncontrolled permitted development (PD) from office to residential will undermine the viability and vitality of town centres as well as potentially affect the amenity of future residents. A survey undertaken by the GLA, Boroughs and the London Office Review Panel recorded 1285 'prior notifications' for such changes of use. 57% of these had been approved, 25% had been refused or withdrawn and the outcome for the remainder was unknown. Among the approved schemes 535 provided details of office floorspace potentially lost totalling 360,000 sq m and approximating to 1% of London's office stock. In outer London the monitoring data indicates that more than 265,000 sq m office floorspace is potentially being converted to residential, almost three-quarters of the London total and approximating to 5% of the outer London office stock (this excludes Enfield and Merton for which data on floorspace is not available). The survey found that of the 412 proposals providing relevant details, 40% of the offices were fully occupied and a further 21% were part occupied. This provides significant confirmation of reports to the Commission that many of the offices being converted to residential are not truly redundant

and underscores concerns that business occupiers are being refused lease renewals because their space is more profitable as housing than as offices. There were also concerns that once an office building is converted to residential, all the floorspace is likely to be lost to office use for the future rather than the ground or lower stories being retained in commercial use as might be required through the normal planning process.

2.1.33 The survey suggests that PD based changes of use have led to approved capacity for nearly 6,500 homes. This figure should be set in the context of the c3,000 pa which have actually been completed in recent years through planned release (usually redevelopment rather than conversion) of identified surplus office capacity (until recently the figure was closer to 4,000 per annum). These completions have been subject to other planning requirements eg for housing standards and affordable housing contributions. In recent years, for residential development as a whole, the number of completed dwellings has been around half the number approved.

Environment / Public Realm

2.1.34 A high quality public realm can fundamentally attract and entice people to visit a town centre (see Mayor's Character and Context Supplementary Planning Guidance). The combination of great public spaces and diverse social and economic activity will create places where people will want to come together to enjoy the activities and services the town centre has to offer. Conversely a low quality, badly designed public realm can have the opposite effect, deterring

people from visiting regardless of the range and type of uses the town centre has to offer; and can often attract criminal like behaviour.

2.1.35 Creating places for people to meet and congregate can particularly help to increase dwell time. These should not only be aesthetically pleasing but also be functional and flexible to allow for a range of activities and uses. Small scale spaces within town centres which allow for different activities and events such as cafes and seating areas, festivals, community events, etc will greatly enhance the offer of town centres drawing in a range of people at different times of the day. By designing town centres around focal points rather than in a linear fashion can help to provide opportunities for these types of spaces. Events such as fetes, concerts and parades etc are all important in creating a sense of place.

2.1.36 Heritage also plays an important role in the quality of the public realm of outer London's town centres. A number of outer London boroughs highlight the significance of their local policies in ensuring the conservation of important heritage features in town centres management such as Shop Front Design SPDs, Local Development Orders for pavement cafes in and Shop Front Improvement Schemes. TfL LIP budgets and the GLA's Outer London Fund also helps to provide sources of investment in the public realm and town centres.

Connectivity

2.1.37 Connectivity by public transport is particularly important; town centres

that are well connected can attract footfall, including the local community, commuters, and visitors from a much wider catchment. Increased footfall will help to support retail and other social and economic functions, thereby increasing the vitality of the town centre. Furthermore, most shoppers arrive on foot, cycle and on public transport³⁹, and evidence suggests that they visit a greater number of shops and spend more than those arriving by car⁴⁰.

2.1.38 The provision of accessible low cost parking can also play an important role in helping town centres draw people back to them. This applies primarily to outer London, where there is more reliance on the car. The Federation of Small Business 2008 Parking Manifesto argued "too many town centres across the country bear the scars of poorly thought out parking policy". In particular, it noted a study which showed that "quality of and access to parking provision within a five minute walk of main shopping streets has a significant impact on store performance"⁴¹. Low priced short-term parking can also help to integrate town centres into the online shopping process such as providing convenience access to click and collect points. Similarly it is a key requirement identified by retailers located in local parades, particularly the availability of close by short term spaces.

Management Tools

2.1.39 The health and vitality of town centres can vary significantly across individual boroughs. The impact of growth in one centre may have a significant effect on the vitality and viability health of a neighbouring one and this inter-

relationship is carefully monitored through the London Plan to assess whether such changes Londoners' access to a competitive range and choice of goods and services. Mary Portas, amongst others, highlights the importance of town centre strategies in town centre management. Town centre strategies should involve governance from local stakeholders, including key landlords, large and small shopkeepers, council representatives with specific knowledge of planning and development, the mayor or MP, other local businesses and service providers, and local residents. The strategies should be visionary and develop a sustainable and relevant offer for the future, including a strong operational management structure for town centres.

2.1.40 Some of the outer London boroughs highlight their own town centres strategies as good practice in town centre management. These strategies include underpinning the 'High Street first' approach in the development of regeneration initiatives, supporting retail start-ups through trading initiatives, skills and training, improving access to Wi-Fi and Broadband and addressing issues such as car parking, delivery arrangements, promotion of sustainable transport initiatives and public realm improvements. They also support a continued approach to joint working with the other partners such as Metropolitan Police and Community Safety services.

2.1.41 The Mary Portas Review, the Policy Exchange and others also advocate the greater use of BID's in town centres to manage planning for example in allowing changes of uses, setting a remit for permitted development rights, the control

of parking fees, limiting the clustering of certain activities as well as their current remits of managing facilities such as toilets, public realm, etc. Many of those who advocate BID's recognise that major changes would remain a matter for local boroughs such as large-scale demolition and the rebuilding of most of a high street would not be within a BID's remit but if councils propose major changes in the BID area, BID's would have to approve them. This would be similar to the neighbourhood planning approach but would give BID's greater control over planning matters. Some outer London boroughs also highlight the role BID's could play in facilitating the repositioning of the retail tenant mix in town centres to better suit the local demographics. Combining the role of the BID with a Neighbourhood Plan, may also provide opportunities to receive a proportion of the local Community Infrastructure Levy (CIL) receipts, which in turn can help fund the objectives of the BID.

Other Issues

2.1.42 There are other barriers which can negatively affect the vitality and viable of town centres. Some of the outer London boroughs raised concerns that the opening hours of many of the retailers in outer London town centres do not always meet the needs or expectations of their communities. This may in part be a 'chicken and egg' situation where retailers do not open due to lack of trade and potential customers do not visit these retail destinations as they know they may be closed at a time which is convenient for them to shop, for example after work, and instead visit the larger centres which further exacerbates the issue. Similarly

the closure of some units on a Sunday can also impact on the overall offer and attractiveness of a centre.

2.1.43 Many of the outer London boroughs also raised concerns over the saturation of uses with 'negative' impacts such as fast food outlets, betting shops, pay day loans etc on the character and appearance of town centres, consequently making them less attractive and inclusive places. In the daytime, a concentration of these type of uses can harm the attractiveness and vitality of the town centre by restricting the premises available for A1 retail which can harm the overall retail mix of the town centre. Many boroughs are seeking to bring forward criteria based planning policies to restrict these types of uses in sensitive areas such as close to schools. Consideration is also being given as to how they can manage to ensure the market is not saturated with them. Many of the boroughs felt that these use class issues are London wide issues which should be addressed strategically. The Department for Local Governance intends to require a planning application for new betting shops where there is a change of use and ensure betting shop operators set out how they plan to comply with social responsibility codes when applying for a gambling premises licence. DCLG will consult on the detail of proposals as part of a wider consultation on change of use in summer 2014.

2.2 OLC ANALYSIS AND RECOMMENDATIONS

2.2.1 The following section sets out the Commission's analysis of the issues discussed in the previous section on

town centres and changing levels and patterns of consumer expenditure. The abatement in the level of growth of comparison floor space demand combined with other changes to retail activity and consumer behaviour, pose challenges to town centres in their current form. London's unique population levels and densities, coupled with its relative wealth and dependence on public and 'sustainable modes' of transport are likely to ensure that a vital and viable town centre network will still be the main framework for planning for retailing in the foreseeable future. However, qualitative consideration must be given as to how the network might be reconfigured to meet customer expectations and modern retailing needs. Based on our analysis, we have therefore provided recommendations to the Mayor on matters the Commission feels he should address either through Alterations to the London Plan or through Supplementary Planning Guidance.

Recommendations for Alterations to the London Plan

Retail Capacity Studies

2.2.2 The Commission notes that the Experian scenarios all point to substantial quantitative retail need in London overall (although less than projected in the previous research that informed the 2011 London Plan). The Commission urges caution on the 'pipeline scenario' since it is inevitable that not all of the pipeline schemes will be built out and thus the need for additional comparison retail floorspace is likely to exceed that indicated under this scenario. For all scenarios the Commission considers that it is more appropriate in FALP paragraph

4.40 to express the numbers as 'gross' rather than 'net' need. This is because a large part of vacant retail space is either obsolete or not fit for modern retail purposes and therefore may not absorb the demand for new space (which is assumed in the 'net' scenarios'). Rather, it is considered more likely that the additional demand will come forward as new or redeveloped/ reconfigured floorspace to meet London's qualitative (as well as quantitative) need. This will need proactive planning to accommodate growth in town centres, and where appropriate new centres in Opportunity Areas, having regard to the impact of polarisation and restructuring of retailing in the capital.

2.2.3 Within this context, the Commission believes that local retail capacity models need to be adapted to take more account of the effects of multi-channel retailing. The premise is that while these studies typically take into account the growth in online shopping, they generally do not take into account the polarisation of the retail market. Many studies implicitly accept that existing shopping patterns will continue and so are likely to overestimate floor space requirements for many centres. As town centres polarise further, the Commission believes in the future it will be necessary to look at how shopping patterns will change over a wider area to understand whether expenditure growth in a borough will drive new floor space in that borough or in a dominant centre in another district.

- **FALP Policy 2.15 Da1 Town Centres:** ensuring retail capacity studies take account of impact of multi-channel retailing
- **FALP Policy 4.7 Retail and Town Centre Development** and paragraph 4.40

New defined roles for town centres

2.2.4 The Commission firmly believes that many of the town centres in outer London may need to reinvent and re-imagine themselves to ensure they are resilient to negative effects of polarisation brought about by a contraction in the projected demand for comparison retail floor space combined with the other changes to retail activity and consumer behaviour such as multi channel retailing. The aim is to improve the quality of the whole place. As is mentioned earlier, one of the keys to achieving a step up in the quality of the overall town centre offer is the provision of improved car parking as much of outer London is not well served by tube or bus services. As the commentary above highlights, polarisation could ultimately lead to 3 types of retail centres emerging:

- (i) strong dominant centres offering the widest range of retail, food and leisure uses providing a rich consumer experience;
- (ii) convenience food and service based centres with enhanced evening economies; and
- (iii) local convenience centres providing top-up shopping.

2.2.5 The strong dominant centres (including most Metropolitan centres and the more attractive Major centres) will attract most of the growth in comparison retail spending. These will require proactive planning to accommodate much of the demand for quantitative and qualitative comparison retail floorspace need to 2036. Selected other centres including those associated with Opportunity Areas will attract significant growth particularly in convenience retailing to meet demand from their expanded catchment populations. The smaller neighbourhood centres are less likely to be affected by the polarisation trends due to them servicing very local catchments. It will therefore be the medium town centres which will suffer the most and in particular the majority of the District centres and many Major centres. These centres will not only present the most challenges but also the greatest potential for 're-invention' opportunities. London Plan policy should urge the need for proactive planning to enable these centres to develop alternative functions and attractions which complement each other, where possible, within the policies delivered through the town centre network. It is also important that London Plan policies recognise the potential impacts of change on smaller local centres which provide a key facility in neighbourhoods within walking distance.

- **FALP Policy 2.15 Db Town Centres:** relationship of the role of town centres to the wider network
- **FALP Policy 2.15 Dc Town Centres:** proactively manage the changing roles of town centres

- **FALP Policy 2.15 Dc1 Town Centres:** realise the potential of larger more attractive town centres as competitive destinations
- **FALP Policy 2.15 Dc2 Town Centres:** consolidation and redevelopment of medium town centres
- **FALP Policy 2.15 Dc3 Town Centres:** ensure local and neighbourhood centres still provide access to local goods and services

Proactive management of surplus retail floorspace

2.2.6 The GLA Experian Report 2013 forecasts a contraction in the expected growth of comparison retail floor space in many town centres. Where this is apparent, this needs to be proactively managed so that these centres can still function in a coherent manner by having a more focused retail core. The Commission recognises that allowing a more flexible but planned approach for change from non A1 uses particularly in secondary and tertiary frontages will help to create shorter and more focused high streets. This will support the retail uses currently there but it is important that local authorities should be encouraged to manage the release of retail units by identifying appropriate areas of frontage for both release and protection.

- **FALP Policy 2.15 Dc Town Centres:** proactively manage surplus retail and office space

- **FALP Policy 2.15 Dc1 Town Centres:** realise potential of larger centres to provide higher density housing as part of mixed use schemes
- **FALP Policy 2.15 Dc2 Town Centres:** consolidation of medium centres to provide a range of non-retail functions and higher density housing
- **FALP Policy 4.7Ca Retail and Town Centre Development:** consolidation of surplus retail and commercial floorspace

Managing the risks associated with relaxation of permitted development rights

2.2.7 The Commission is concerned that the relaxation of permitted development rights from small retail units to residential could lead to pepper potting of new residential properties in ground floor town centre frontages which could undermine the vitality and viability of centres and constrain the potential for higher density mixed use housing redevelopment opportunities. In the FALP and the Town Centres SPG the Commission considers that it would be appropriate for the Mayor to provide guidance on the interpretation of 'key shopping areas' (the term used in the Statutory Instrument governing the relaxation) to help ensure London-wide consistency in the application of this term. Account should also be taken of flexibility in the criteria in the Statutory Instrument to ensure that the substantial potential uplift to housing potential in town centres is not compromised.

- **FALP Policy 2.15C Town Centres:** prior approvals
- **FALP Policy 4.7 Retail and Town Centre Development:** prior approvals

Diversify the offer of town centres

2.2.8 The Commission believes it is important that town centres diversify their offer by developing alternative functions and activities to draw people back and support their retail base. It is acknowledged that retail is just one part of a town centre economy. Concentrating economic activity in the centre will increase footfall which will then support activity on the high street. The Commission feels that town centres are influenced and shaped by a range of other factors such as infrastructure, connectivity, proximity, communities, vision, branding, public realm, public safety, hours of opening, culture, office, housing and parking. Encouraging a range of social, community and economic uses as well as developing the evening economy will help to drive footfall and encourage people to use town centres more giving them a USP (Unique Selling Point) which online shopping cannot deliver. The relocation of public services back into town centres is also important in helping to drive footfall and bring people back. In addition, town centres should also market themselves as convenient hubs for collecting products ordered online as modern retailing must be about improving, not replacing, consumer choice.

- **FALP Policy 2.15Dc Town Centres:** diversifying the offer of town centres, particularly high density, mixed use development

- **FALP Policy 2.15 Dc1 Town Centres:** diversifying the offer of the larger attractive town centres with higher density housing
- **FALP Policy 2.15 Dc2 Town Centres:** diversifying the offer of medium centres with a range of non-retail functions to address local needs
- **FALP Policy 2.15 Dc3 Town Centres:** diversifying offer of local and neighbourhood centres through the provision of housing

Support Digital Strategy

2.2.9 It is critical that town centres have world class digital infrastructure. While London's, and in particular central London's digital infrastructure is as good or better than that of many world cities, it does lag behind some others such as Hong Kong and Singapore. To enhance their competitiveness, town centres should therefore take advantage of technology, by developing integrated digital strategies, incorporating mobile, social media and websites. In many town centres, although independent retailers are sometimes filling spaces left by the multiples they do not have always have the knowledge or skills to harness the internet or market themselves in a way that multi channel retailing can offer. London Plan policies should encourage local authorities and/or BIDs to support these types of businesses where they can, for example through an 'Emporium' – a business incubator hub for retailers where they can jointly promote themselves and their products as a part of a town centre package.

- **FALP Policy 4.11Aa Encouraging a Connected Economy:** encourage the provision of wifi

Retention of local employment space

2.2.10 The Commission strongly believes that the liberalisation of permitted development rights to convert redundant offices into housing will need to be monitored very closely by the Mayor and boroughs to ensure town centres do not suffer by undermining their future ability to provide a range of office floor space, and also that the new residential conversions are not compromised by the ability to provide adequate servicing, deliveries and management arrangements of adjacent commercial uses. In light of the results of the GLA/borough/LORP survey of the impact of PD rights, and suggestions that, for the short/medium term at least, employment may be growing faster than is anticipated in the London Plan, there is concern that significant levels of unplanned office conversions could ultimately result in town centres being unable to offer sufficient suitable office accommodation uses in the future.

2.2.11 The Commission also believes it is important that London Plan policies should support the provision of workspace or premises for small and medium enterprises, particularly for start up companies or co-working spaces.

- **FALP Policy 4.10Ac New and Emerging Economic Sectors:** provision of workspace for small and medium enterprises

Flexibility

2.2.12 The Commission recognises each town centre is different with its own strengths, weaknesses, opportunities and challenges; and will often require bespoke solutions that revolve around a basket of solutions rather than one big fix. The future of town centres will rely on their individual character and sense of place and the range of services and activities they provide beyond the retail offer. Local knowledge and experience combined with a strategic outlook is essential to ensure outer London's town centres are resilient and are able to respond to future challenges. It is important that London Plan policies allow flexibility for local authorities to provide these bespoke solutions while maintaining the overall town centre hierarchy.

Supplementary Planning Guidance Recommendations

Provide guidance on latest consumer expenditure projections and floor space requirements

2.2.13 It is important that the latest consumer expenditure projections and floor space requirements are kept up to date, particularly in light of the recent contraction in the level of growth projected for comparison retail floor space and that recognition is made of the need to replace obsolete retail floor space. This will help to ensure boroughs can plan and respond accordingly to both the challenges as well as the potential opportunities these changes might reveal. The advice and guidance in the Town Centre SPG should therefore reflect the most recent understanding of projections and floor space requirements.

Recognise the growth in multi-channel retailing

2.2.14 As discussed above, it is important that the Town Centre SPG also recognises the significance in the growth of multi channel retailing and the potential opportunities it could provide for town centres that embrace it. Guidance in the SPG should look to promote issues around developing a digital strategy including the provision of wi fi, the marketing of town centres as convenient hubs for click and collections, developing town centres 'accounts' managed by a high street marketing manager to receive real time information about deals as well as providing support for small and independent business such as business incubator hubs to market themselves and their products. The SPG should also highlight the importance that local retail needs assessments take account of the growth in multi channel retailing, particularly in regards to the impact this may have on spending patterns and the catchments areas of certain retail destinations.

Draw on existing London Plan policy 2.15 to support evolution and diversification of town centres beyond retail for a mix of uses including housing

2.2.15 As highlighted in the Commission's recommendations for policies in the Further Alterations to the London Plan, the Town Centres SPG should provide guidance on the importance of town centres developing alternative functions and attractions through the promotion of a more diverse range of new services and facilities alongside their retail core. This is particularly important for middle

ranking town centres such as major and district centres which may suffer the most from the effects of polarisation. The SPG should promote a diverse mix of uses including housing, education, health, arts, leisure, employment, public services, etc. A diverse mix of uses can enhance a town centre's offer, enabling greater use of the town at different times of the day, encouraging a wider range of people to use that centre, helping to support the retail base and ensure it maintains, or where possible, enhance its role in the town centre hierarchy.

Draw on existing London Plan policy 2.15Cb to accommodate economic and housing growth through intensification

2.2.16 The Town Centre SPG should draw on existing London Plan policy 2.15Cb to promote the intensification of town centres, where appropriate, to accommodate economic and housing growth. The proactive management of a reduction in surplus comparison floor space can provide opportunities for this. Not only can higher density housing lever in resources for comprehensive town centre renewal as part of mixed use redevelopment and expansion but the increase in resident population can help to support retail as well as other services and facilities and ultimately ensure the town centre's vitality. The Town Centre SPG should provide guidance on the location, design and management of housing, especially in relation to night time activities, including out of hours servicing and deliveries, as well as issues around the conversion of retail and /or offices to residential and the potential impacts this may create.

Recognise the importance of car parking

2.2.17 The Commission believes that the provision of affordable and easily accessible car parking can be an important factor in encouraging retailers to locate in some town centres in outer London. It helps bricks and mortar retailers compete with online retailers in terms of providing click and collect facilities as well as making it easier for people to access town centres as opposed to out of centre locations. The Town Centre SPG should therefore recognise its importance for some outer London town centres.

Encourage the creation of flexible spaces in town centres

2.2.18 The Commission strongly believes that the creation of flexible spaces for different activities such as events, parades, cafes, festivals, etc not only helps create a sense of place and identity for town centres but also provides places for people to congregate, encouraging them to spend longer in the town centre. The creation of squares and pavement areas where activities can spill out of buildings into the public domain, complemented by outdoor screens for news or the showing of concerts can support town centres' vitality, for example at Woolwich. The Town Centre SPG should encourage this type of space / activities and emphasise the importance of redesigning and planning town centres around focal points rather than in a linear fashion.

Maintain a degree of flexibility in guiding development

2.2.19 The Town Centre SPG should recognise that each town centre is different and that whilst many share similar characteristics, which help to define their role in the town centre hierarchy, the opportunities for responding to the challenges they face may differ significantly. It is therefore important the SPG provides guidance and a range of solutions that will help boroughs respond flexibly based on local knowledge and experience.

Greater role for delivery mechanisms such as BIDS / Town Centre Strategies

2.2.20 The Town Centre SPG should recognise the importance of delivery mechanisms such as BIDS or town centre strategies in bringing together a range of stakeholders who can deliver real change for a town centre in a planned and co-ordinated manner which can balance the long terms goals and short term wins for the benefit of the whole town rather than a few vested interests. The Town Centre SPG should highlight case studies where these types of delivery mechanisms have inspired real change on the ground. It should also highlight the importance of these delivery mechanisms in being embedded into wider planning of the area, including neighbourhood planning and local plans to ensure the goals and aspirations for the area are complementary.

Other recommendations

Support for extending the Mayor's regeneration funds for outer London

2.2.21 The Commission gives full support to a further round of the successful Mayor's regeneration funding to support the vitality, viability and growth of town centres in outer London.

ENDNOTES

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- ³ BIS, Genecon and Partners, 2011
- ⁴ Ibid
- ⁵ Beyond Retail, Redefining the Shape and Purpose of Town Centres, November 2013
- ⁶ The Grimsey Review, September 2013
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- ⁸ Centre for Retail Research, Retail in 2018 - Shop Numbers, Online and the High Street.
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- ¹¹ Mary Portas Review, 2011, p9
- ¹² The Grimsey Review, September 2013
- ¹³ London Assembly, Open for Business: Empty Shops on London's High Streets, March 2013, p15
- ¹⁴ Mayor of London, 2013 London Town Centre Health Check, GLA 2014
- ¹⁵ Centre for Retail Research, Stores of the Future 2012 - 2015
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- ³⁵ UCL, The Bartlett School of Graduate Studies, The Past Present and Futures of the High Street, 2014
- ³⁶ Centres for Cities, Beyond the High Street, Why City Centres Really Matters, September 2013
- ³⁷ Maccreeanor Lavington, PBA, GHPA, Accommodating Growth in Town Centres, GLA 2014
- ³⁸ URS, Supporting Places of Work: Incubators, Accelerators and Co-working Spaces, GLA 2014
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- ⁴¹ Policy Exchange, 21st Century Retail, 2013



BARKING TOWN CENTRE

CHAPTER 3

REALISING THE HOUSING POTENTIAL OF TOWN CENTRES

3.1 ISSUES/CONTEXT

Challenge to manage London's growth

3.1.1 London's population has increased at a much higher rate over the past ten years than had previously been assumed. It was thought that London had been growing at around 46,000 people per year between 2001 and 2011, and that between 2011 and 2036 it would grow by around 51,000 per year. However, publication of the 2011 Census showed that the actual growth between 2001 and 2011 was an average of 87,000 per year, nearly double the rate of that which had been assumed previously. This equates to 8.2 million people in London in 2011 rather than 7.8 million that had been expected.

3.1.2 This increase has been driven by three main factors:

- A reduction in internal out-migration;
- An increase in domestic in-migration; and
- A significant increase in natural change.

3.1.3 Further analysis shows that much of this increase was in the second half of the decade, since 2007. It is unclear how much of this increase is likely to be 'structural', and will be sustained into the future, and how much of it may be 'cyclical', coinciding with the economic downturn and that there could be a return to pre-2008 levels. Both ONS and the Mayor have recognised this uncertainty. ONS projections go up to 2021 only and suggest London will grow by 117,000 per year to 9.37 million by 2021. The Mayor, on the other hand, has

produced 3 longer term scenarios which are based on projecting forward mortality, fertility and migration trends but differ in their domestic migration assumptions beyond 2017. These scenarios suggest that London could grow by 91,000 – 106,000 per year up to 2012 and by 64,000 – 88,000 per year over the longer term to 2036.¹

3.1.4 As well as the overall growth in population, the composition of the population is also expected to change. Of particular significance is the growth in older people. It is expected that the over 64s will grow by 64% reaching 1.49 million people by 2036, with the over 90s expected to grow to 89,000 by 2036.

3.1.5 There is also uncertainty as to the size and number of future households. Contrary to past estimates, the 2011 Census revealed that the average household size has risen from 2.37 persons/household in 2001 to 2.47 persons/household in 2011². As with population growth, it is uncertain whether this change is cyclical rather than structural. Notwithstanding, this could still mean an extra 1 million households in London by 2036.

3.1.6 Patterns of household formation have also changed significantly over the years. The main two trends which have influenced household formations patterns is falling representation among those aged 20 to 34, and increasing household representation among those aged 40 to 59. The key drivers behind the fall in household formation among the young are likely to have been increasing participation in higher education and increasing costs of housing. The future direction of household formation for this

age group will therefore depend on future trends in these factors, which, themselves, are difficult to predict. The rise in household formation among those aged 40 to 59 correlates with a decline in the proportion of Londoners of those ages married or cohabiting and this is likely to be the primary cause for the change. The proportion of people who are married has been falling for decades, but it is unclear at what rate this trend will continue, if at all. In addition, there is also likely to be an increase in one person households, particularly among older people and in lone parent and other multi-adult but non family based households.³

Housing need and supply

3.1.7 Based on the projected household growth described above and assuming the backlog of housing need is cleared over the term of the Plan (to 2036) or within ten years, the GLA's 2013 Strategic Housing Market Assessment suggests an annual requirement for 49,000 – 62,000 new homes per year. Given the importance of realism in addressing need (on average over 50,000 homes have been approved a year but only 25,000 pa have been completed), the Further Alterations use the 49,000 figure as a working target.

3.1.8 This projected annualised growth in households is mainly from smaller households – either couples or 'other' households which includes those without couples, lone parents or dependent children. Town centre housing could be particularly appropriate in addressing the needs of these smaller households including those which have distinct needs eg students and some older people.

The SHMA also indicates that there is a requirement for larger homes, which reflects demand for more space rather than simply need, as well as a particular requirement for intermediate housing. It is important to note that the SHMA looks only at housing requirements at the London level and does not provide any estimates of requirements at the local level.

3.1.9 On the supply side, the GLA's 2013 Strategic Housing Land Availability Assessment (SHLAA), which looks at the capacity of available and developable land in London for housing, shows London to have the capacity to deliver at least 42,000 homes per year. The SHLAA establishes housing capacity by identifying large (over 0.25 ha) sites allocated or approved for housing development; potential large housing sites currently in other uses to which it attaches probabilities of them coming forward for housing development; potential housing capacity from small sites (under 0.25ha); non-self-contained units; and vacant units returning to use.

3.1.10 To close the gap between housing need shown by the SHMA (49,000 pa) and identified supply shown by the SHLAA (42,000), the FALP proposes new policies to better realise the housing potential of what the National Planning Policy Framework calls 'broad locations' which, because of their size and/or character have scope for higher density development towards the top, or in justified exceptional circumstances above the density ranges set out in the London Plan. The Housing SPG provides guidance on these exceptional circumstances. FALP defines these 'broad locations' as

Opportunity Areas, surplus industrial land near transport nodes, other large sites (with capacity for over 500 dwellings) and, of particular relevance to the work of the OLC, town centres which have scope for renewal/redevelopment.

- 3.1.11 While there is a national mismatch between housing demand and supply, it is especially acute in London and has a particular impact on housing costs and affordability, especially for those on lower incomes and first time buyers. This has knock on effects for the London's labour market and economy when people cannot afford to live within a reasonable distance to work both in terms of time and cost. In September 2013 the average price of a house price was £434,000 in London compared to £255,000 in England as a whole. London's average prices have risen by 9.4% since September 2012, more than twice as fast as the 4.2% national increase⁴. Private renting is also significantly higher in London than elsewhere, costing £1,250 a month compared to £585 in England as a whole⁵. In terms of affordability, Londoners now need around nine times their salary to afford an average house compared to four times their salary in 1997⁶. These issues will continue to be exacerbated unless there is a step change in delivery which enables London to better address its housing needs.

Re-shaping of town centres

- 3.1.12 One of the main principles of the London Plan is that it seeks to accommodate growth in a sustainable way within its own boundaries, without encroaching on protected green spaces. Bearing in mind the current housing shortage, town centres

have real potential to help increase housing supply across London. As noted in the previous chapter, housing can play an integral part in a 'community hub' solution for diversifying the offer of town centres. Increasing the residential population can drive footfall, which will help to support retail as well as other services and facilities, and ultimately ensure the town centre's vitality. In addition, the value of residential development will help support the viability of mixed use development within town centres, allowing opportunities for a greater range of services and facilities to be provided. If this is not the case, not only will the units remain vacant but the opportunity missed to provide substantial new residential space which offers better design opportunities and density gains will be lost.

- 3.1.13 Increasing the density of development is one of the ways that London can increase capacity without losing green spaces or an even greater amount of industrial land than envisaged in the SHLAA. The London Plan Sustainable Residential Quality (SRQ) density matrix sets out a range of potential densities for different types of area (suburban, urban and central), based on public transport accessibility of those areas. Depending on their size and scale, town centres should generally fall between 'urban' and 'central' areas. The London Plan makes clear that the density ranges set out in the matrix should be used as a starting point and that other factors such as local context, design, open space, provision and capacity of social infrastructure, etc should be considered to refine an understanding of the capacity of sites to achieve the optimum density appropriate

for that site. Future proposals for development such as planned transport improvements or other approved schemes should be reflected in the consideration of appropriate densities. This means that the densities ranges are only a guide and should not be seen as either maximum or minimum, as it is the individual site's characteristics and context which will ultimately establish the density within the broad ranges set out in the matrix. Indeed, a study by Maccreeanor Lavington et al showcase a range of different situations within town centres where there are opportunities through mixed use development and careful innovative designs to deliver more housing⁷ towards the top or in exceptional, justified circumstances above the density range for a particular location. Guidance on such circumstances is already provided in the Housing SPG. The consultants show how higher densities can be achieved whilst ensuring quality and how different issues such as active frontages, main roads, integrating large scale retail, social infrastructure, open space, servicing, parking, etc may be managed to ensure a continued successful viable town centre. This is a point echoed by some outer London boroughs, in that higher densities should not necessarily mean tall buildings. Thoughtful, innovative high quality design should help to mitigate some of these concerns.

3.1.14 Vacant properties in town centres may also provide another important source of housing. The upper storeys of town centre retail and other buildings accommodate a variety of uses, including storage and offices as well as flats. Whilst many of these are economically viable, there are a significant number, especially those

associated with older buildings, which are under-occupied or vacant. This may be due to a variety of reasons including tenure, management, access or longer-term structural change in the retail market. Although different town centres in outer London will vary in the amount of vacant or under-occupied space available, the planned redevelopment of flats above shops, at higher densities, and the conversion of surplus commercial space to residential use is supported by many outer London boroughs. In areas of secondary or tertiary frontages, consideration therefore needs to be given as to whether the refurbishment of vacant upper floors above retail would be better than complete redevelopment of building. This requires an understanding of whether retail units in these secondary or tertiary frontages are viable and likely to be re-let.

3.1.15 Maccreeanor Lavington et al make clear that viability is a key consideration in housing led town centre renewal. Higher densities will usually be essential to support reinvigorated ground floor uses, an enhanced street environment and/or affordable provision. In marginal locations, hard choices may have to be made in trading off these 'desiderata' – the new housing may not have sufficient value to support all of them. For example, if local priorities are for affordable housing and an enhanced street environment it may not be possible to also 'subsidise' ground floor uses which are not in themselves viable. Bringing the residential down to the ground floor in such circumstances then poses a design challenge to ensure that it complements the overall offer of the centre. It may be more appropriate on the fringes of

centres where the old retail space is truly redundant and a residential frontage is acceptable in the overall street scene.

Housing Intensification

3.1.16 In the larger town centres where there is scope for large scale change, it is envisaged that development opportunities will take one of two paths. In some, where there is demand there will be residential led mixed use development with some retail, in others, there will be retail led mixed use development with some residential to support it. Both are considered viable in the larger centres as the polarisation of the retail market means that retailers are focusing development of their larger stores in the more successful town centres, while the strong housing market ensures high returns for residential uses. For the middle tier centres (some major centres and most district centres), it is likely that there will be more residential-led redevelopment with contraction in traditional comparison floorspace on the ground floor and a diversification to non-retail uses such as the provision of social infrastructure or leisure uses. Due to the potential consolidation of retail frontages in these centres, it is not considered likely that that the redevelopment will be retail led on viability grounds. For the neighbourhood and more local centres, redevelopment is likely to be residential only. It is important that any redevelopment or conversion to residential uses in these neighbourhood and local centres still provide access to convenience/everyday retail needs and top up shopping as well as other essential services to the local catchment population. Full consideration

should be given to using the air space above buildings including above existing town centre frontages. The Commission notes that many high street parades and frontages in outer London have only one or two storeys above ground floor shops compared to inner London centres which often have four to six. The potential of surface car parks for redevelopment should also be investigated.

Comprehensive Redevelopment

- 3.1.17 One of the key concerns for the outer London boroughs is the impact of piecemeal, incremental change through the conversion of retail/ offices to residential and how this could cut across a more comprehensive approach to redevelopment. Whilst many outer London boroughs believe that it is desirable to introduce housing into town centres, they emphasise that it should support retailing and not compete with it. Planned comprehensive redevelopment provides greatest scope to introduce both modern ground floor units and provide higher density housing on the upper stories. However, in some circumstances the edge of centres may be the most appropriate for residential development e.g. to maintain a focused town centre core or where heritage streetscape must be conserved. Careful consideration of good access to public transport is also needed.
- 3.1.18 As land is generally more profitable for housing than retailing, the introduction of Permitted Development Rights⁸ could compromise comprehensive redevelopment by 'pepper potting' a centre with higher value uses which would make such an approach unviable. This will

then constrain the potential of a centre in achieving a higher overall uplift in housing provision and scope to improve the ground floor units. Often cultural uses such as pubs and cafes as well as the independent retailers are the first to lose out to residential development. There is concern that the loss of such uses will undermine the well-being, cultural diversity and community resilience of some of outer London's town centres.

3.1.19 There is also concern that a piecemeal approach will potentially harm town centres' viability in terms of breaking up active frontages and damaging the vitality and viability of those retailers left by isolating them. It may also harm the amenity of the new residents by the residential units being in the wrong location, the encouragement of potentially poor standards of accommodation e.g. small unit sizes below space standards, potentially create conflict between uses in terms of noise, odour, servicing and deliveries as well as leading to a loss of financial contributions towards essential infrastructure as these changes will not be liable for CIL or S106 contributions – particularly education. Conversion to residential use through PD rights also reduces the provision of affordable housing, a particular issue in outer London considering the increasing differential between average income and average house prices.

3.1.20 It is important therefore that local authorities are able to work with partners to identify appropriate areas of frontage, or streets for release and protection. In addition, a more comprehensive approach to redevelopment should help to ensure issues such as those described above

are dealt with effectively. The potential opportunity to increase the density of housing in town centres also necessitates a more comprehensive approach to be taken to ensure that the capacity of sites is fully optimised and that the step change in delivery will provide high quality housing which is fully integrated with its surroundings and benefit the town centre as a whole.

Integration of transport and development

3.1.21 One key prerequisite of higher density housing is the public transport accessibility of town centres. The London Plan density matrix sets out public transport accessibility as a fundamental driver for establishing the appropriate density of a scheme. The higher the PTAL rating of a town centre, the greater the potential opportunities for achieving higher densities. Development at transport nodes is more sustainable and mitigates adverse impacts of population growth such as congestion on the roads. The London Assembly's report "The future of London's Town Centres" May 2013 recommends a Transit Oriented Design approach towards realising higher densities. This is based on an understanding of transport and land use, where transport schemes are specifically engineered to provide opportunities for development and regeneration⁹. Investment in outer London's transport infrastructure is therefore essential in order for outer London's town centres to realise their potential for achieving increased densities for housing and for their future viability. In particular, some outer London boroughs stress that a lack of public transport connectivity to the

tube network in the south of London is preventing many of their town centres from realising their full potential. Rail devolution, which gives greater control to the Mayor and TfL to increase capacity and change routes across London, as well as other enhanced public transport services, can also play a part in helping town centres remain or become attractive.

Intensification and Infrastructure

- 3.1.22 The intensification of town centre housing needs to go hand in hand with the provision of infrastructure to support this step change in delivery. In addition to transport and activity infrastructure, additional social and community infrastructure should be provided through mixed use schemes. As stated above, there is more scope for this in the middle tier centres where retail is less likely to be part of the mix due to a contraction in demand. Innovative designs can ensure that existing social infrastructure can be sensitively re-provided in redevelopments. Where space is at a premium, it is important that opportunities for the multi-use of some units to provide different social and community facilities are seized. Large-scale uses such as libraries can sometimes be perceived as barriers to town centre intensification, but can instead provide an opportunity, providing large single-ownership sites and ground floor non-residential uses.
- 3.1.23 As highlighted above some new high density housing in town centres may not lead to a commensurate increase in CIL receipts if a development is a result of PD which is not CIL liable. This exacerbates the issue of ensuring appropriate levels of infrastructure to meet the population's

requirement, particularly in relation to the current funding cuts and financial constraints many providers face. To provide certainty there should be early completion and approval of CIL schedules.

Amenity and Character of Town Centres

- 3.1.24 Intensification is a process of change that traditionally takes place over a period of time. Not surprisingly, the existing character and context of a town centre is highly significant in how any intensification is received. The character of an area includes not only the physical, social, cultural and economic characteristics of a place such as its built form, its activities and function, the different demographics of people who live and use it but also other characteristics such as how different people perceive and experience the place. The London Plan's approach to optimising housing delivery on individual sites means that development of these sites must have regard to the character and local context in which these developments are located. Where large scale comprehensive redevelopment is planned, these developments might have the potential to define a new character for the town centre, which should be seen as positive. The Maccreanor Lavington et al report shows with thoughtful and innovative design it is possible to achieve higher densities whilst respecting the character of a place or improving it for the better. In justified, exceptional circumstances (as set out in the Housing SPG) it is possible to exceed the relevant density matrix range and respect, complement and enhance the character of the centre and surrounding area.

3.1.25 In terms of amenity, some outer London boroughs are concerned that a step change in the number of new residents in town centres might create tensions with existing uses. The new residents might object to town centre's functioning and operational requirements, particularly noise from service vehicles at any time of day as well as night-time noise from patrons of clubs and pubs. Comprehensive managed redevelopment rather than a piecemeal approach of increasing housing supply in town centres will help to mitigate some of these potential issues and should be considered in the early preparation of town centre strategies and action plans. More details on conflicts between uses are discussed in Chapter 4 managing the night time economy of town centres.

Type of Housing

3.1.26 Town centre housing is generally more suitable for certain types of people, usually non-family households. It is usually focused on smaller households of one to two persons that can be accommodated in one or two bed properties as these are easier to accommodate in higher density schemes. This is a key group in terms of addressing housing need, accounting for two thirds of projected household growth. Demand for one to two bed homes is also likely to be higher in town centre locations than family style accommodation as the types of people; single, couples, students and older people for example, appreciate the benefit of town centre locations with good access to shops and leisure facilities outweighing the negatives. For older people, the proximity and access to a greater range of facilities and services can

help maintain a sense of independence for longer, helping to provide a better quality of life. Provision of good quality housing for older people in town centres locations can help to provide genuine options for people as they get older who are looking to downsize, which will free up the supply of these larger homes for families who need them.

3.1.27 Higher density housing in town centres can also meet specialist housing need such as that for students. Students bring vitality and activity to town centres providing footfall at non-peak times, which helps to activate the public realm. Students also help to support the night time economy.

3.1.28 Some outer London boroughs have stressed that whilst they recognise town centre housing is more suitable for certain types of people, the needs of family housing should also be addressed. However as the Maccreanor Lavington et al report highlights, there are a number of reasons why the demand for family housing may not be as strong in town centres as elsewhere. These include a relative lack of facilities for children, remoteness from schools, lack of private garden/ outdoor space, greater noise levels than suburban locations, and restricted access to private parking. The morphology of higher density buildings also make family living less appealing as the ability to see the children at play in a communal play area from an apartment is critical, and this ability is largely removed in higher buildings. It should also be noted that focusing new town centre provision on the needs of smaller households can free up larger homes elsewhere, whether these be shared

housing occupied by groups of younger people, or family homes occupied by older people.

Mechanisms for delivering and bringing forward housing

3.1.29 Around 25,000 homes have been delivered each year in London for the last 10 years. This is just over half of the 49,000 homes which are needed to be built each year to meet London's housing need. There has been speculation that a reluctance to give planning permissions is holding up the delivery of housing, but this is not supported by the facts. Of planning permissions over the last 16 years, around 56% have not been built, although this also includes those with recent planning permission which have not been implemented yet¹⁰. Non-implementation of planning permissions may be due to various reasons however it is apparent that without significant new entrants to the market, this undersupply of delivery will continue. This either means new private sector housing developers, although there are substantial barriers for entry due to scale required or, more realistically, it requires new models or mechanisms for housing delivery¹¹.

3.1.30 The Private Rental Sector model is particularly suited to town centre redevelopment. The private rented sector offers a flexible form of tenure, meeting a wide range of housing needs and is a growing part of London's housing market. The model allows developers to retain control of the residential elements of a mixed use scheme and operate the whole building as an investment. By letting units on assured shorthold tenancies also avoids many of the complications

around residential leaseholders' rights. This type of large-scale institutional investment in private rental housing could be particularly suited to enable high density residential development for smaller households. It could also provide a valuable source of new funding for the housing sector and there has been much effort put into developing practical business models for this emerging sector. However, there are also many barriers for the sector, these include occupier churn due to shorthold tenancies, rental enforcement and rights compared to commercial tenants, management costs, and most significantly viability compared to private sale¹².

3.1.31 Another model for housing delivery is Tax Increment Financing (TIF). This modal allows public sector money to be borrowed to fund development and infrastructure. Future income from business rates is used to subsidise current improvements, which create the conditions for future income. It is still yet to be properly tested in the UK as the Treasury is imposing strict limits on the type and scale of developments that TIF can be used to fund. There may be potential for TIFs to be used to help pay for large infrastructure such as transport alongside the comprehensive redevelopment of parts of a town centre.

3.1.32 Local Asset Backed Vehicles are another mechanism which could be used to help realise development and regeneration objectives. Through the creation of a corporate entity with a private sector partner, a public body transfers an asset, usually real estate, to this entity and the private sector partner matches the value of those assets with cash. Development

is then carried out by the private sector partner and any profits are shared between the public and private sector partners. This type of model allows risks to be shared; however an equal share is assumed on the basis that the future development is financially viable. In many cases this is not the situation and the public sector has to also inject development capital alongside the private investment. LABV's are also subject to the need for the private sector to gain a reasonable return from their investment. Potential conflict also exists in the aspirations of public and private partners with different agendas for social and economic benefits conflicting with motivation for maximizing commercial returns. Changes in the political and investment landscape can also lead to a partnership unravelling¹³.

3.1.33 Real Estate Investment Trusts (REITs) are property companies that allow investors to gain in the risks and rewards of property investment without the need to physically own or develop properties themselves. Individuals can invest in REITs either by purchasing their shares directly on an open exchange or by investing in a mutual fund that specializes in public real estate. An additional benefit to investing in REITs is the fact that many are accompanied by dividend reinvestment plans. REITs are exempt from Corporation Tax but investors are subject to the same regime as if they obtained rent directly from the property. As with PRS, REITs have similar barriers such as management, the relative performance of the sector compared to commercial assets, occupier churn, etc¹⁴.

3.1.34 Another potential model is direct funding for the public sector to build affordable housing, 'Council Housing' as they once did. Whilst there is still a backdrop of restricted local authority funding, restrictions are being slowly eased. As stated above, there is a question as to whether affordable housing, which is mainly aimed at families, is best suited in high density town centre locations. The need for some mixed use development to contain an element of retail would also complicate matters in terms of ownership and management. However, there may scope in the middle tier centres and neighbourhood and local centres for this type of model to work, particularly on the fringes of town centres.

3.1.35 The GLA is exploring the concept of a London Housing Bank focused on large-scale developments to generate additional supply. This could include purchasing market homes off-plan, or underwriting developments by offering guarantees through Build to Rent. Funding could come from a range of sources, including the public sector and institutional investors. The funding provided by the public sector would be repaid, potentially including a value uplift, and then reinvested in delivering more homes.

3.1.36 The concept of Housing Zones was flagged in the Mayor's draft Housing Strategy and has now been launched by the Chancellor and the Mayor. These zones include measures that focus on a range of targeted tax incentives, in a similar way to Enterprise Zones, lighter touch planning and effective land assembly to help bring forward housing development. Twenty such zones are

proposed for London and this type of model could be used in the future alongside other measures for helping to bring forward housing in town centres¹⁵.

3.1.37 The use of Town Centre Investment Management is another delivery tool that can be used to support town centres and enable the delivery of housing. One of the barriers to successful town centre management is fragmented ownership which means town centres are sometimes unable to adapt to change. TCIM is a process that enables the core of town centres to be brought under single control or ownership, to enable them to perform like their managed counterparts enabling the optimum retail mix, forging a clear branding, co-ordinating marketing and targeting physical change involve the town centre's wholesale redevelopment¹⁶.

3.1.38 Compulsory Purchase Orders powers are another mechanism which can be used to amalgamate sites and create clean titles for developments. More detail on the use of CPO to delivery housing is in Chapter 5.

3.2 OLC ANALYSIS AND RECOMMENDATIONS

3.2.1 The following section sets out the Commission's analysis of the issues discussed in the previous section on realising the housing potential of town centres. Based on our analysis, we have provided recommendations to the Mayor on matters the Commission feels he should address through either the Further Alterations to the London Plan or any Supplementary Planning Guidance that he will be producing in due course.

Recommendations for Alterations to the London Plan

Intensification

3.2.2 London's town centres have real potential for intensification through housing led, higher density mixed use renewal and development. Not only will this intensification help to provide a valuable source of new housing but will result in more people being in and around town centres, increasing footfall and supporting a greater range of activities which will ultimately strengthen the vitality and viability of that centre. However, the Commission would like to emphasise that additional housing should support rather than replace viable town centre uses – mixed use redevelopment provides an opportunity to provide modern, attractive ground floor units for a wide range of occupiers. To minimise fit out costs, potential occupants should be engaged in their design from the outset. It is also important to recognise the role of housing choice in the provision of higher density housing and how this new supply of housing should not hamper the development of mixed and balanced communities. Whilst it is acknowledged that higher density housing is more suitable for non-family style housing, there may be opportunities in the fringes of town centres for more family accommodation. Access to local facilities is also important.

3.2.3 The Commission would like to emphasise that there should not be a 'top-down' approach to setting density levels for town centre redevelopment. Town centres in outer London are varied in character and will need local solutions in order to ensure that density levels

fully reflect the local circumstances. In justified exceptional circumstances such as those set out in the Housing SPG there can be scope to exceed the top of relevant density range and make a positive contribution to local amenity and character.

- **FALP Policy 3.3 Da Increasing Housing Supply:** closing the gap between need and supply through intensification
- **FALP Policy 2.15 Dc Town Centres:** realise potential of planned redevelopment including higher density housing in a high quality environment

Planned Approach

3.2.4 The Commission strongly stresses that this step change in housing delivery should be managed as part of a planned approach rather than piecemeal. There is a real danger that a small-scale pepper-pot approach will not only compromise the continuity of the retail frontage, which will undermine the viability and vitality of that centre but also lead to potentially incompatible neighbouring uses, creating tensions over noise and retail operating requirements such as servicing, night-time deliveries, etc. London Plan policies should therefore stress the importance of a planned approach to help mitigate these issues. In the meantime however opportunities to intensify centres for housing and commercial development in line with London Plan policy 2.15Cb can still be taken through the development management process. In particular, where retail frontages contract and are unlikely

to return, the opportunity should be taken to redevelop for residential use.

- **FALP Policy 2.15 Town Centres:** managed approach to housing delivery in town centres

Delivery Mechanisms

3.2.5 There are a number of models which can assist in the delivery of increasing housing supply in town centres. The Private Rental Sector model is particularly suited to town centre redevelopment although providers face specific challenges when compared to private sale development. Other models include a range of finance packages such as TIFs, REITs, LABVs, etc. Many involve a partnership approach between the public and private sectors in order to share risks and rewards. TCIM is another delivery vehicle which has the potential to significantly help in the delivery of housing in town centres, particularly through a comprehensive approach to redevelopment. The Commission urges the Mayor to take the lead in helping to further refine these models in order to ensure there is a range of tools available to assist in the bringing forward of as much housing as possible to help to reduce the gap between the need identified in the GLA's SHMA and the current capacity identified in the GLA's SHLAA.

- **FALP Policy 3.8Ba1 Housing Choice:** promotion of other delivery mechanisms

Supplementary Planning Guidance Recommendations

Draw on existing London Plan policy 2.15 to support evolution and diversification of town centres beyond retail for a mix of uses including housing

- 3.2.6 The Town Centre SPG should make clear the importance of town centres diversifying their offer so that they contain a mix of uses, including housing. An increased resident population will help to drive footfall, which in turn will help to support a retail base as well as other services and facilities, and ultimately ensure the town centre's vitality. Housing will form a key part of a community hub solution with other essential services and facilities.

Draw on LP policy 2.15Cb to accommodate economic and housing growth through intensification

- 3.2.7 The Town Centre SPG should emphasise the potential for town centres to deliver housing and economic growth through diversification and intensification. Whilst it is important for local authorities to be able to set the appropriate densities for different town centres in their boroughs, the SPG should provide guidance on the opportunities available for increasing density within different situations. The Town Centre SPG should also provide guidance on the location, design and management of housing, including in relation to night time activities as well as issues around the conversion of retail and /or offices to residential and the potential impacts this may create.

Emphasise importance of quality and supporting infrastructure

- 3.2.8 The Town Centre SPG should emphasise the importance of providing quality and supporting infrastructure in order to support a step change in the delivery of housing in town centres. This includes transport, social and community infrastructure, digital connectivity etc. There may be opportunities for social and community infrastructure to be provided as part of a mixed use scheme. The SPG should highlight other opportunities provision such as the multi provision of infrastructure in the same buildings.

ENDNOTES

- ¹ GLA, 2013 round population and household projections
- ² GLA, Strategic Housing Market Assessment, 2013
- ³ Ibid
- ⁴ ONS, House Price Index, Data to September, 2013
- ⁵ ONS, 'Index of Private Housing Rental Prices, Historical Series', 2013
- ⁶ GLA, Strategic Housing Market Assessment, 2013
- ⁷ Maccreanor Lavington, PBA, GHPA, Accommodating Growth in Town Centres, 2014
- ⁸ The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012
- ⁹ London Assembly, The future of London's Town Centres May 2013
- ¹⁰ GLA, London Development Database Data, 2013
- ¹¹ Maccreanor Lavington, PBA, GHPA, Accommodating Growth in Town Centres, 2014
- ¹² Ibid
- ¹³ Ibid
- ¹⁴ Ibid
- ¹⁵ GLA Draft Housing Strategy, 2013
- ¹⁶ Peter Brett, Investing in the High Street, Town Centre Investment Management and its role in delivering change, 2013
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CROYDON TOWN CENTRE AT NIGHT © LONDON BOROUGH OF CROYDON

CHAPTER 4

MANAGING THE NIGHT TIME ECONOMY IN TOWN CENTRES

4.1 ISSUES / CONTEXT

Capturing economic and social benefits of night time economy

4.1.1 London is a great city for night time entertainment and socialising. It contains thousands of bars and pubs, restaurants, theatres, cinemas, comedy clubs, night clubs, late night galleries, exhibition centres, concert halls, museums and The O2. These form an important part of London's economy and its offer as a world city, as well as providing key services for many of London's residents, visitors and workers. The night time economy sector is a major employer, estimated to provide 11% of London's jobs¹, although many of these jobs are low pay, part time but flexible. Night time economy related jobs, includes jobs in the recreational and cultural services and the catering sector. The sector turns over £18bn per annum² and plays an important role in terms of boosting London's visitor economy and enhancing the offer of London's town centres, contributing to their vitality and viability. Londoners' have an average disposal income of £38,012 compared with the national average of £31,044 disposal income³. Londoners also spend an average of £66.10 per week on night time economy related goods and services compared with the national average of £52.20 per week.⁴

4.1.2 In addition to the economic 'contribution', the night time economy also forms an important part of the social and cultural life of Londoners, attracting visitors from neighbouring regions, the rest of the country and overseas. As well as the more obvious attractions in central London, night time activities in town

centres in outer London play an important role in local communities through pubs, restaurants, cinemas, clubs, bookshops, theatres, church halls, live music and other public venues providing access to grassroots cultural activity. People favour different entertainment and leisure activities depending on their age, family status, culture or other preferences; for example the young, families, older and retired people, Black, Asian and minority ethnic (BAME) groups etc. The night time economy also has particular significance to some of London's diverse communities. Some members of lesbian, gay, bisexual and transgender (LGBT) communities, in particular, use the leisure and night time economy as a visible element of their urban lives⁵.

Bridging gap between day and night uses

4.1.3 Town centres in outer London should provide a portfolio of functions. Lots of activities take place during the daytime, and especially at weekends, and it is important to link them up with night time activities. A more diverse night time economy will encourage a wider range of people to use that centre at night, including those who are not attracted to alcohol-driven entertainment activities. In particular, encouraging civic cultural activities into the evening can help to address the quieter period which can occur between the retail shops closing and restaurants/bars becoming busy later in the evening. Linking retail and other evening economy uses will help to increase dwell time and help to keep town centres alive with activity. Extended retail opening hours beyond 5pm, allied with appropriate entertainment and food

offers in cafes and restaurants can also extend dwell times for shoppers of all generations into the early evening. Some of the outer London boroughs highlight the trend towards the multiple use of some pubs and bars which take on a café aspect during the day. This not only helps to keep active frontages in the town centres during both the day and night but also helps to broaden the appeal of town centres through offering a wider range of uses throughout the day and night without requiring more premises.

- 4.1.4 Partnership working with town centre businesses should aim to bridge the gap between day and night activities. Potential issues related to the night time economy are not necessarily dealt with by stakeholders who deal with the day time economy, who generally have more influence on decision makers. In response to that, some outer London boroughs highlight local schemes, such as the 'Safe and Sound' initiative in Romford and Hornchurch which aims to join up the management of the day time and night time economy through a partnership approach with the local council, Metropolitan Police and local businesses to promote the town as a safe place to live, work and visit.

Conflict of uses

- 4.1.5 As discussed in the previous chapter, town centres have the potential to significantly increase the provision of housing. However, it is important to consider and address potential conflicts between encouraging a vibrant night time economy and the proposal to increase the amount of residential use within town centres, to ensure a balance is struck between

these town centre uses. One particular conflict that may arise relates to noise. Residents can be disturbed by late night entertainment-related noise in three main ways: transmission through the structure from attached premises; leakage of noise from premises; and noise of people in the street, queuing or especially when leaving premises. While good acoustic design can, with conscientious management and maintenance, control noise from pubs, clubs and other entertainment premises, other design features such as single aspects can help to manage noise issues. However this will need to be balanced with other objectives such as active frontages. It is harder to control noise generated by dispersing patrons on the street. The location of large alcohol-focused venues near to night transport nodes can help to manage the problems of crowd noise on the street.

- 4.1.6 One outer London borough has observed a rise in the demand for banqueting sites, which cater for over 600 people. The scale of these venues can lead to negative impacts on residents due to noise and disturbance, particularly late at night. Through its planning framework, the Council actively encourages the location of new banqueting suites in the upper floors of town centres, retail parks and other similar locations with good public transport and car parking facilities, where the impact on residential areas is minimised.
- 4.1.7 Not only may conflicts potentially arise between night time uses and residents but there may also be conflicts between different types of night time uses or indeed the same type. In particular, it may not be appropriate to locate large night

club venues or pubs in close proximity to each other as issues may arise when patrons are leaving the premises, such as fighting fuelled by excessive alcohol consumption or the quick build-up of a large number of people in an area.

- 4.1.8 Night-time servicing and deliveries also have the potential to create conflict with residential uses, however through careful planning, and technology and training to make these activities quieter, residential development should not necessitate restricting them.

Managing Issues

- 4.1.9 Noise and disturbance, littering, street fouling, vandalism, drug dealing, violence and anti-social behaviour are all negative impacts of the night time economy. Excessive alcohol consumption and associated anti-social behaviour can lead to extra costs for policing, cleansing, environmental services and ambulance services and Accident and Emergency Departments. In parts of town centres where these types of activities take place they can also cause problems and fear for local residents and visitors with some people feeling excluded from their neighbourhoods. Businesses may also be affected and feel the cost of such behaviour, particularly in relation to vandalism, street fouling etc.
- 4.1.10 Public perception and reputation is also a factor in either sustaining a positive image or a negative one and will often influence behaviour and attract different socio-economic groups into town centres. Management of these issues is therefore very important to ensure town centres can benefit from the positive aspects of

a vibrant night time economy without suffering the negative impacts. In order to provide this management, it is crucial for boroughs to have a good understanding of the nature and scale of local activity. Gathering local information on issues such as crime, health, pedestrian flows along with the mapping of other data such as noise complaints helps to build up a local picture of activity and whether any intervention may be needed to manage negative issues. Data relating to 'raves' promoted through Twitter and Facebook should also be monitored and reviewed with local police. The views of local residents, businesses and groups and users of the night time economy should therefore be sought and taken into account.

- 4.1.11 When analysing crime and disorder in the night time economy it is important to consider the relationship between types of incident and time of day. In local borough studies, data on drug related incidents showed that street drug dealing and other drug related offences peak during the late afternoon. So while street drug dealing may be an issue in a town centre it may not be particularly linked to night time activities. Similarly, unless significant numbers of shops are open in the evening it is sensible to exclude from any analysis shoplifting or related crime⁶. Comparing the number, geographical spread and time of day of crime and disorder incidents against the total number of people on-street in a town centre through the night provides a strong evidence base to show the changing impacts of activities throughout the night. The mapping of crime data also enables the targeting of appropriate actions to be taken by

a range of agencies. Comparing data through mapping can help to identify locations where certain types of incidents are occurring, for example mapping noise complaints against the licensing of premises which are open in the evening / night time. Health data in the Public Health Outcomes Framework can also be used to help to prioritise and target local areas of concern and encourage cooperative working and partnerships to reduce the harms associated with alcohol misuse.

4.1.12 Pedestrian flows can also help to identify where trouble spots may occur. This may require primary data collection as estimating numbers based on the capacity of premises can be misleading because not all parts of all premises will be in use or full on most nights. It also does not take into account the wider use of the town centre from people not going to licensed premises. An alternative approach to comprehensive pedestrian counts can be automated pedestrian counters (as used by TfL) to understand flows on key routes or through locations. Tube and bus passenger data is useful for understanding flows at specific sites, but doesn't have the ability to predict onward flows and routes used. New technology being trialled, such as mobile phone tracking, may offer new ways to assess pedestrian numbers and routes in the future.

4.1.13 An integrated approach to management will require the co-ordination and cooperation of partners within a local authority, including planning, licensing, trading standards, environmental services departments, and external partners such as town centre management partnerships

or agencies (including BIDs), the metropolitan police, ambulance services, A&E departments, crime reduction partnerships and transport providers, as well as residents, providers and users of the night time economy. It is important that these partnerships involve people who can make links with other relevant local initiatives on crime, drugs, anti-social behaviour, town centre marketing, tourism and the visitor economy, etc. The involvement of major commercial partners or operators from the licensed trade can also help to ensure any initiatives have their support as their decisions about programming and their management policies will have a significant impact on the local area and potential success of any proposals.

4.1.14 A joined-up approach to enforcement action has proved beneficial to managing the impacts of the night time economy in certain locations. Targeting premises with known problems can help them develop actions to trade more responsibly. The Metropolitan Police's Safer Neighbourhoods scheme has been developed across London as a way of tackling grassroots problems. The Purple Flag status for town centres is an accreditation process similar to Green Flag Award for parks and Blue Flag for beaches which can also help to provide standards of excellence in managing the evening and night-time economy through a comprehensive set of standards, management processes and good practice examples⁷.

4.1.15 Many of the outer London boroughs draw attention to the various strategies they have developed to help manage the night time economy. For example, The

Royal Borough of Kingston has developed 'The After Dark Strategy 2007' which aspires to make Kingston a destination of first choice for evening entertainment for all age groups by encouraging shoppers to stay into the evening. It aims to make Kingston town centre more hospitable and welcoming, safe and secure, easily accessible with good, affordable transport links home late at night, with a wider variety and choice of venues and activities on offer. The Kingston strategy also seeks to promote and expand the provision of non-alcohol based entertainment. Cinemas, theatres, churches, etc. are all important providers on non-alcohol based activities.

4.1.16 Other initiatives highlighted by the outer London boroughs include 'banned from one banned from all' which is operated by the London Borough of Havering, which ensures trouble makers once banned from one establishment are banned from all of them. Anyone who is arrested in the town centre is given a preliminary ban. The Safe and Sound group then meet to discuss and decide how long the ban should be for. Bans have lasted for anything from two months to two years. Currently 124 people have been banned from the day time economy in Romford Town Centre and a further 453 people banned from the night time economy for a variety of crimes from drugs misuse, sexual assault and being drunk and disorderly. 'Deeper Lounge' another initiative by the London Borough of Havering which operates on Friday nights between 10pm and 3am, provides hot drinks and food as well as a safe haven for people to sober up. In addition there are also Street Pastors, who are church volunteers who work alongside the Deeper Lounge initiative

helping people to recover from the effects of excessive drinking and drugs. They currently operate on a Friday night and every other Saturday. Street Triage centres are mobile centres which are run by St John's ambulances alongside the Deeper Lounge on a Friday and Saturday night 10pm to 4 am. The team deal with some of the drink related injuries in the town centre and make a decision as to whether the person needs to be taken to hospital. Havering emphasises that it helps reduce hospital admissions and the unnecessary attendance of ambulances in the town centre dealing with 'non emergencies'. The Council also uses Door Supervisor Briefing Sessions, which are weekly briefing sessions to help encourage two way information sharing, allowing the police to inform the door supervisor teams on any intelligence they have received during the week. 'Drug itemisers' is a further initiative which helps establishments managed potential drug issues. Premises across the borough are regularly swabbed for the presence of drugs. Results are fed back to the licensees letting them know their results and where perhaps more work is needed.

4.1.17 In the Royal Borough of Kingston, in recent years perceptions about crime and anti-social behaviour have prompted initiatives to try to overcome this fear and have included the provision of uniformed and trained community rangers, who coordinate with CCTV, police and community support officers. The installation of help points and upgrading street lighting in areas of need helps to manage the perception or fear of crime.

4.1.18 Night time cleansing is an important aspect of managing the night time

economy and has been successful in improving local environmental quality in many areas. Police believe that a lack of toilet provision makes it harder for them to tackle street urination as offenders often argue there were no alternatives. Ensuring there are suitable facilities for those people out at night will not only help to keep the town centre clean and maintain the quality of the public realm but also reduces the costs to businesses and potential conflict between day and night time uses.

Safety

4.1.19 Some people feel excluded from London's town centres at night, particularly at the weekend. Concerns around safety affect a range of people, including women, older people, children, disabled people, gay men, lesbians, bisexual and trans people. Cultural factors may constrain participation among some BAME communities. Safety issues can include discrimination, violence fuelled by alcohol, personal safety when moving around the town centre and using transport, etc. In order for all Londoners to be able to use and enjoy the night time economy in town centres safely and without fear, it is essential that policies and practices take account of the particular vulnerabilities and risks of victimisation that some sections of the community may face.

4.1.20 Ensuring that people can get home safely and conveniently from a night out makes a significant contribution to reducing problems associated with the night time economy. Disputes over taxis or in queues for buses can lead to disorder. Addressing the issues around

public transport at night can reduce the number of people waiting on the street and provide opportunities for people to get home quickly and safely. Key agencies with transport responsibilities are Transport for London and London boroughs. A number of outer London boroughs have highlighted initiatives which assist in helping to manage these issues such as the Taxi Marshall Scheme in the London Borough of Havering that operates on a Friday and Sat night. It provides a safe waiting area until a taxi arrives and safe transport home for people late at night. The scheme reduces the risk of disorder arising from those using the selected taxi points, minimises the opportunity for illegally 'plying for hire', enhances security for the drivers of hackney carriage and private hire vehicles, and promotes pro-active partnership working between those with a role to play in the evening economy.

4.1.21 Night buses are also an important way for many Londoners to get home from a night out. London benefits from one of the largest networks of buses anywhere in the world with a number of routes running for 24 hours. TfL has invested in bus stops across London to provide a safer and more secure waiting environment for passengers, including improved lighting. CCTV has also been installed on buses to help protect both the drivers as well as passengers. Even with these measures however, many 'vulnerable' people are still wary to use them for personal safety reasons.

4.1.22 The Underground also provides a valuable mode of transport for those trying to get home safely. As a result of experience during the 2012 Olympics,

there are proposals to provide a 24 hour service on parts of the tube on a Friday and Saturday nights. This is expected to be introduced in phases, starting in autumn 2015 with the Northern, Piccadilly, Victoria, Central and Jubilee lines.

4.1.23 Cheap, safe car parking facilities are also important for people getting home easily and safety in outer London, particularly where there is a lack of public transport options. However it should be noted that this type of provision should only be encouraged for people using non-alcohol based activities.

4.1.24 Lighting is particularly important in ensuring people feel safe when using the town centre at night. This can be achieved through high quality design and maintenance of the public realm ensuring secure by design principles are built into high streets to reduce areas which are completely dark or have concealed points. Ensuring there are clearly defined egress routes for people to following when moving around the town centre will help in this.

Clusters of activities with negative impacts

4.1.25 As discussed in Chapter 2, there is real concern among outer London boroughs about the cumulative effects of clusters of activities with negative impacts. In terms of the night time economy, their concerns mainly relate to fast food takeaways and night clubs. Whilst a small number of these types of establishments provide a service which is an integral part of the night time economy, when an area becomes saturated with them,

issues around litter, congregations of people standing outside these premises creating higher levels of noise, etc. all become more intense. Some outer London boroughs stated that they are looking at introducing policies to manage 'negative' uses, which would operate in tandem with measures such as the introduction of alcohol control zones to address and manage street drinking issues. As emphasised in Chapter 2, what strongly came out of the outer London borough responses was the fact that this is considered a London wide issue which needs strategic guidance.

Students

4.1.26 Many outer London boroughs and others believe students provide a valuable contribution to the night time economy, helping to promote town centres as places to do business. This is further supported by evidence presented to the Mayor's Academic Forum which underscores the important contribution students make to local economies. One outer London borough however, reports perceptions about crime and anti-social behaviour linked to students and the night time economy are not only dissuading business investors from locating in some town centres in outer London but also resulting in increased levels of concern regarding student accommodation proposals as well as support for the provision of further night time venues in some town centre locations. However this is not the view held by most and in fact the Mayor's Academic Forum was told that perceptions associating students with anti-social behaviour may stem from earlier times – modern students generally do not have resources to indulge in such

behaviour, and as many are from overseas, they do not come from cultures where it is 'normal'.

4.2 OLC ANALYSIS AND RECOMMENDATIONS

4.2.1 The following section sets out the Commission's analysis of the issues discussed in the previous section on managing the night time economy in town centres. Based on our analysis, we have provided recommendations to the Mayor on matters the Commission feels he should address through any Supplementary Planning Guidance that he will be producing in due course.

Supplementary Planning Guidance Recommendations

Provide case studies of a range of interventions to support a vibrant evening economy

4.2.2 It is clear that a vibrant night time economy is hugely valuable to the vitality and viable of town centres in outer London for both the economic but also the social benefits it brings. Ensuring that the town centre offers a diverse range of uses and activities can help to encourage a wider range of people to use the town centre. Linking up day and evening activities can assist in this. It is also important to ensure that all Londoners and, specifically, 'vulnerable' people feel safe using the town centre, particularly at night. There also needs to be recognition that there may be conflicts between different types of uses, particularly in relation to noise producing activities and an increase in the amount of residents in town centres, which will

need to be managed so that there is an appropriate balance between these types of activities. The Commission therefore feels that the Town Centre SPG could usefully provide case studies of where a range of interventions have successfully supported a vibrant evening economy in outer London and other suburban town centres. Examples of how services are co-ordinated across agencies in the provision of public transport, licensing and policing would be particularly helpful.

Draw together guidance and best practice on how the management of clusters of activities with negative uses

4.2.3 Concern over the saturation of uses with negative impacts in town centres came through strongly in the outer London boroughs' responses. The Commission therefore believes that the Town Centre SPG should provide clear strategic guidance on how to manage the clustering of activities with negative impacts such as fast food takeaways, recognising that there may be different difficulties between day and night time issues. Inclusion of case studies where these types of activities have been successfully managed would be particularly helpful.

Flexibility

4.2.4 The Commission firmly believes boroughs are best placed to manage the night time economies of their town centres, with support from other agencies such as Transport for London, Metropolitan police, town centre managers etc. The Town Centres SPG should provide strategic guidance but acknowledge that local solutions based on local experience and expertise will be the most effective.

ENDNOTES

¹ ONS Annual Population Survey (APS), October 2012-September 2013

² The Mayor of London, Draft Cultural Strategy: 2012 and beyond, June 2010

³ ONS Family Spending, 2012

⁴ Ibid

⁵ Mayor of London, Best Practice Guidance – Managing the Night Time Economy, March 2007

⁶ Ibid

⁷ www.atcm.org/programme/purple_flag/WelcometoPurpleFlag



GallifordTry

CONSTRUCTION SITE

CHAPTER 5

HOW CAN THE DEVELOPMENT POTENTIAL OF LARGE SITES BE REALISED

5.1 ISSUES / CONTEXT

5.1.1 As discussed in chapter 3, London is experiencing a serious housing shortage. Not only is London growing at a much faster rate than had previously been assumed but the continued undersupply of housing over the past few decades means that this situation is getting worse and worse each year. This is further compounded by the gap between the need for housing which equates to around 49,000 homes per year and the supply of housing, where the GLA's 2013 Strategic Housing Land Availability Assessment (SHLAA) estimates there is capacity for 42,000 homes per year. This report however has indicated that there may be further growth potential in areas such as town centres and opportunity areas. It is therefore imperative that the potential of large sites are realised wherever possible to help increase housing supply and other development objectives across London.

Availability of brownfield land

5.1.2 Brownfield land provides a significant source of land in London which has the potential for development or redevelopment; however there is sometimes a misunderstanding or misconception over the definition of brownfield land. Some outer London boroughs have disputed whether or not there is indeed a substantial stock of 'brownfield' land readily available in outer London for housing or other development; and in their response to the Commission have pointed out that there are only a couple of large 'brownfield' sites which may have development potential in their boroughs. In London, brownfield land is considered anything

which has been previously developed, so can include derelict sites as well as those with existing uses such as retail, housing, offices, etc; it is anything which is not considered 'greenfield'. In terms of large sites, the GLA's SHLAA identified 293ha of land in outer London which could be developed for housing. It considers large sites as those over 0.25ha which are approved/allocated for housing or may have some probability of development; the vast majority of these are on previously development land - 'Brownfield'.

5.1.3 London has 38 Opportunity Areas (OAs) and 7 Areas for Intensification (AIs), with the capacity to delivery 310,000 new homes and 576,000 new jobs¹. The 16 Opportunity Areas and 4 Areas for Intensification in outer London have combined capacity for 126,000 homes and 116,000 jobs. Generally, each of the Opportunity Areas can deliver 5,000 jobs and/or 2,500 homes along with supporting facilities and infrastructure. Intensification Areas are typically built up areas with good existing or potential public transport capacity which can support redevelopment at higher densities. Some of the Opportunity Areas and Areas for Intensifications require significant investment from both the public and private sector, whereas in others the level of public sector investment needed is more limited. They are a significant source of land for meeting housing and other development needs.

Certainty

5.1.4 Realising the potential of large sites can give rise to complex issues. Clear planning

requirements that are available at the earliest stage of development are more likely to result in sites developed in a way that meets the wider objectives of the area as well as address any internal issues, as an understanding of priorities can be factored into costs and planned at the design stage where there is more scope for discussion. Development Briefs, Area Action Plans, masterplans or site specific policies can all help to provide a clearer understanding of what the priorities are for the site and how it fits within the wider planning for the area.

5.1.5 For the larger sites, Opportunity Area Planning Frameworks (OAPFs) can help to set the context and provide a detailed understanding of the role of the OA. Placemaking will be an essential component of these frameworks, including provision of complementary retail, leisure and social infrastructure uses as well as the potential for tall buildings. As large, usually cleared, brownfield areas, OAs have particular scope to determine their own character and accommodate densities towards the top, or in justified exceptional circumstance as set out in the Housing SPG, above the relevant density range. Equally, large sites tend to require longer timescales to secure development during which time planning requirements can change as can market conditions and development viability. Flexibility, giving the ability to respond to these changes, is therefore important also. In particular, rigid site specific allocations of larger sites can give rise to implementation problems over time. Thorough consultation will also help to build community buy in. The most successful developments will have commitment across the board, from the banks that fund the development, the

developer and contractors, residents and interest groups to the Council senior officers and Members.

Joint Working

5.1.6 Many outer London boroughs have highlighted the importance of joint working between the public and private sectors in bringing forward large sites. It is important the strategies, objectives and aspirations of both sectors are clear so that shared interests can be established which will help to provide more certainty in the realisation of the development of sites. Joint working will also help to focus resources more effectively by using the skills and capacity of each sector and also allow expectations to be managed more successfully.

5.1.7 It is also important that there is an effective mechanism, usually the local planning authority, to mediate between the various development interests, particularly if there is disagreement between the aspirations for the site. This often involves emphasis on the pre-application stage of scheme design. Developers should be encouraged to discuss design proposals with community groups and others as part of the pre applications to resolve concerns where possible.

Speed and consistency of public sector

5.1.8 Many developers are frustrated at the slow speed of the planning system both in terms of pre-application and application stage. Whilst they acknowledge that applications need to be duly considered, they feel there is limited recognition

from local authorities that time is money and that delays in decisions, even in pre-application discussions, can have severe consequences for the viability of schemes². The larger schemes can take years to secure planning permission, during which time market conditions may have changed. Clarity of objectives from politicians and officers at the early stage of development, with early member engagement is seen as critical. Developers also highlight that dealing with other public sector bodies other than local authorities can also delay development. It is recognised that these inputs are important, however many developers feel that this input should be managed better with discussion of any potential issues brought up early in the design and pre application process in order to avoid delays and potential derailing a scheme.

- 5.1.9 Another impediment to the time it takes to bring forward large sites is changes to policies and requirements. The addition of development requirements as a result of policy changes, which may not have been factored into the costs when the land was bought, can affect the viability of schemes. A pragmatic approach to understanding the potential of a site and its viability can help to bring forward development which otherwise would not happen. The speed at which the local plan is produced and adopted can also inhibit the development of sites; particularly if the time between draft plans and adopted plans is lengthy as it can create tensions over the validity of controversial policies.
- 5.1.10 A big concern of developers is the skills and capacity of local authority staff to manage large scale schemes, particularly in light of budget cuts local authorities

are facing. The changeable nature of public sector in terms of staff turnover can also have a significant impact³. For larger sites, which can typically take up to 18 months or longer to go through the planning system, a change of officer can significantly delay or even prohibit an application as either their interpretation of policies is different than the previous officer or they simply don't agree with decisions made earlier on in the process. Senior staff input is therefore very important to ensure consistency in decision making. Issues around staff turnover may have eased in recent years, due to the recession and more people staying put, however the industry is now picking up and this may become a more pressing concern again.

Private Sector Capacity in House Building

- 5.1.11 A report commissioned by the GLA on the Barriers to Housing Delivery found that there is currently considerable construction activity in house building in the private sector, almost back to peak 2007 levels. The strength in the market is in part due to a high level of pre-sales with 48% of homes currently under construction being pre-sold⁴. Nevertheless, housing delivery over the last decade has averaged only 25,000 homes per year, and is well below the levels needed to meet London's current and future housing need (49,000 pa). The Barriers to Housing Delivery Report states that nearly half of the planning permissions for house building in the planning pipeline is controlled by companies who, for a range of reasons, are unlikely to actually build. This is further backed by evidence from the

GLA's London Development Database data. As referenced to earlier in chapter 3, 56% of planning permissions over the last 16 years have not been built out. These 'non-builders' include private owner occupiers, investment funds, historic land owners, government and 'developers' who do not build⁵. As only 55% of the pipeline is in hands of 'builders', the full potential of the housing pipeline is therefore unlikely to be realised.

5.1.12 Of the firms that are willing to build houses, many say that they do not have any issues with their current sites; their sites are viable and funding is in place for construction. With a few exceptions, these firms also say they are operating at capacity. They have already expanded following cutbacks in 2008 and would be cautious about expanding further. One of the main barriers is the number of firms operating in the market. In the twelve months to June 2012, 70% of private sale housing starts were carried out by just 23 firms. Only one of those firms, Tesco, can be considered as a genuine new entry in the market place. Without significant new entrants to the market, this undersupply of housing delivery will continue. There are also challenges in the capacity of local markets to absorb new provision - the consultants of the Barriers to Delivery Report thought that on average, across typical large sites, only 250 dwellings could be absorbed every three years.

Viability

5.1.13 Not only are residential values not uniform and vary significantly across London, the viability of different types of properties is also very variable in different parts of London. For example the

development of family homes for sale in some part of outer London is more viable than the development of flats. This is due to land values, build costs and the returns received for the sale of the units. This was borne out in the GLA SHLAA Viability Assessment April 2014 report, which stated that, the viability of schemes in some boroughs in low value areas is finely balanced and in many cases may need public sector subsidy to bring forward key sites.

5.1.14 In terms of increasing density to achieve more development on the same site, there is a limit at which the scheme becomes unviable. This is based on a balance between the build costs compared with the ultimate return for selling the units. Whilst increasing the density of a scheme will increase the developer's returns, there will be a tipping point where further increasing the density will push build costs (for example the need to provide lifts, fire escapes, greater space requirements for waste disposal, etc) above the returns gained from selling the units. This tipping point varies across outer London. In general, in lower value areas, lower density schemes are more viable as build costs are proportionally higher than in the higher value areas⁶.

5.1.15 The regeneration and revitalisation of many of London's town centres, particularly the large middle group falling between the economically strong metropolitan centres and local parades providing 'day to day' goods and services, will require a more informed understanding of the issues which impact on scheme viability and therefore the willingness or otherwise of developers to commit investment to them. Also, there

will need to be a greater appreciation of the levers which London boroughs can pull to facilitate these schemes and a willingness to operate them to assist developers. This is because the bulk of the investment likely to be available for new retail and housing schemes will need to come from the private sector. Most of the investment available for large retail and mixed retail/leisure and housing schemes will go to schemes located in the major centres. Outside these limited locations, local authorities will need to make the terms of development as attractive as possible to developers if they are to secure a share of the limited funds likely to be available.

5.1.16 Private sector investment, however, is footloose and will only go to those locations where developers judge the risk/reward ratio is acceptable and where the local authority culture at Member and at senior officer level supports positive engagement to make the development process smooth and certain. This means understanding key issues including: the level of return required if the scheme is to proceed; development appraisal methods; the importance of getting the timing right within economic and property cycles; the influence of funders and financiers and the importance of cash flow through the development timetable.

5.1.17 This problem is often compounded in brownfield sites which typically have a level of abnormal development costs stemming from the need to deal with issues such as contamination, poor ground conditions (e.g. drainage), lack of access and the need for reinforced utilities especially power and water. These costs have to be met in addition to

section 106 demands, CIL contributions and affordable housing quotas. In the extreme, some brownfield land is too costly to develop without significant public subsidy in even the most buoyant property market where sales values are high.

Finance

5.1.18 The availability of finance since the recession has had a significant impact on building rates across London. Particularly for the larger sites, there are often huge upfront costs for developers in the earlier stages of the development process, sometimes years before the development starts to generate sales income. For the more difficult sites, where there may be multiple ownerships, land contamination, access constraints, existing infrastructure constraints, etc, these upfront costs can make schemes more risky. The riskier the site, the more difficult it is for builders/developers to access finance as the lending criteria for borrowing are much stricter than has previously been the case.

5.1.19 Clarity and certainty on public funding is therefore important, including extra public funding on difficult sites and investment in accompanying social and transport infrastructure. This is particularly important given that in the weaker economic locations, lower sales values alongside relatively market norm costs make it more difficult for developers to fund section 106 demands, CIL contributions and affordable housing quotas.

5.1.20 London boroughs should also explore other funding opportunities, for example through BIDS, business rates,

CIL contributions, grants and planning obligations. In these instances, it would be important for boroughs to have a clear strategy for prioritising projects and be clear who is responsible for delivery, particularly where there are public private partnership arrangements in place. Some outer London boroughs have suggested that housing development could be boosted by the form of a government-backed lending stream that could operate on a London-wide level to support developers who cannot borrow the necessary funds to help them develop. The funding stream could be made viable so that it becomes a self-sustaining entity. They stress that with a ring-fenced housing fund in place, it could enable faster build rates across London.

- 5.1.21 In relation to the development potential of large sites for the development of commercial properties, some of the outer London boroughs also suggested a sliding scale or Government relief from business rates could act as a stimulus for business development in the form of Business Development Targeted Enterprise Zones.

Contaminated Land

- 5.1.22 Some of London's larger brownfield sites may be contaminated by past land use practices. Contamination may pose a risk of pollution to people and the environment, however not all land that is contaminated presents an environmental or human health risk. The real or perceived costs of remedial treatment of land can act as a significant barrier to successful regeneration, particularly if contamination issues and their solutions are not identified early and integrated into the redevelopment of

a site. Risks and uncertainty regarding land contamination may inhibit the redevelopment of brownfield land and in some cases this may contribute to long term dereliction. In addition, the costs for remediation can reduce the contribution available for social infrastructure and other obligations such as affordable housing or even require a public subsidy before development can be contemplated. An assessment of the risks associated with developing contaminated or potentially contaminated land is therefore essential to inform decisions about the appropriate level of treatment, clean up or remediation that may be required.

- 5.1.23 One outer London borough has suggested that where brownfield sites are being brought back into use for solely residential purposes, those sites should enjoy a measure of public investment, facilitated by the Mayor. For example, in the case of the remediation of sites particularly if it is a result of the location of utilities, a ring-fenced fund, managed by the Mayor, could be made available to relevant developers as a type of 'Housing Performance Agreement' to deliver housing on brownfield sites.

Provision of Infrastructure

- 5.1.24 The majority of outer London boroughs have stressed the importance of the provision of infrastructure to support the development of large sites and to unlock the growth potential of certain areas. Certain pieces of infrastructure are needed at key stages of development, usually the transport and utilities infrastructure at the earlier stages with the social infrastructure being delivered later. Public utilities such as energy and

water in particular can add substantial upfront costs to the development.

- 5.1.25 Realistically, the private sector cannot be expected to foot the full infrastructure bill. Particularly for more complex sites, where there are significant remediation costs, the added cost of delivering the required infrastructure can sometimes make sites unviable. The public sector therefore needs to take a more proactive enabling role to unlock and bring forward these larger sites. Promoting cooperation between developers and the ring fenced funding described above could also be used to bring forward the necessary social and physical infrastructure to be built alongside new housing.

Compulsory Purchase Orders

- 5.1.26 Compulsory Purchase Order (CPO) powers are a powerful tool in the regeneration of town centres and other large sites. They provide the power for local authorities to acquire rights over land or to buy the land outright, without the current owner's consent in return for compensation. One of the main benefits of them is to bring together land under a single ownership with a clean title. Fragmentation of ownership is often a major barrier in the successful regeneration of sites. The acquisition of land under compulsory purchase also means that any covenant on the land is extinguished and therefore provides a clean slate for development, subject to planning requirements.
- 5.1.27 Regardless of these benefits, there is often a general reluctance by many local authorities to use CPO powers due to a number of perceived difficulties in

implementing them. The complex nature of some sites and the difficulties in land assembly in combination with a political resistance to what some see as forcing people out of their homes and premises in the case of businesses can be a significant disincentive. One issue that complicates the process is concerns around compensation rights. The compensation codes used by surveyors still do not provide sufficient incentives to secure early agreement to acquisition by treaty. This can cause significant delays to the process through protracted negotiations which could be avoidable.

- 5.1.28 The length of time between the making of the order and a subsequent planning inquiry is also considered too long by some local authorities and can sometimes put the redevelopment of schemes at risk. Lack of funding or cash flow can also make it difficult for local authorities to use these powers, as statutory time limits give authorities a limited time to secure procurement and funding arrangements. Good practice would also suggest that local authorities should have a private sector partner agreement in place so that as soon as the land is acquired, it is bought by the private sector partner and development can proceed as quickly as possible. Also, it is essential for local authorities to put a planning permission in place early in the process either with a developer partner or on their own behalf, as without an extant planning permission that establishes a clear intention to proceed to development, a CPO is very unlikely to be confirmed.
- 5.1.29 The skills and capacity of the local authority also adds to this general reluctance in using CPO powers. This is

particularly pertinent in the constrained finance climate many authorities are facing. Some outer London boroughs have emphasised that there needs to be more training for planners and surveyors. This could be included in professional courses or as part of CPD. A number of boroughs have suggested that the Mayor could facilitate such training for London's public sector.

Simpler Procurement Process

5.1.30 A simpler procurement process can help in the delivery of large sites. One of the main concerns of developers is the costs involved in procurement, the time it takes and the propensity for challenge. The availability of construction partners can also affect the procurement process and ability of developers to bring forward some of the larger sites. There has been a significant reduction in many small and medium size firms as a result of the economic downturn⁷.

5.1.31 The London Development Panel has been successful in accelerating the delivery of housing in London. However many London based medium sized developers are excluded from the framework agreement. Some of the outer London Boroughs have suggested that a mechanism is needed for bringing medium sized developers forward, perhaps as a separate list.

Other Barriers

5.1.32 There are a number of other barriers which can inhibit the development of large sites. Help with land assembly is vital; especially the amalgamation of typically difficult small and awkwardly

shaped town centre sites with poor access into larger slices of land that are worth developers investing in. Fragmented ownerships can also inhibit land assembly particularly if the land has different covenant agreements. An important way in which London boroughs can assist is by being willing to exercise their compulsory purchase powers to deliver key sites with clean title and a clear timescale for assembly. In cases, where compulsory purchase powers are not being implemented, there may be delays by protracted negotiations regarding the sale of land as developers use ransom strips to push up the cost of their land.

5.1.33 The overpayment for land prior to the economic downturn is a significant barrier to redevelopment of some large sites. Some developers may have paid a high price on the assumption that values would continue to rise. The build costs in combination with planning requirements and obligations may mean that some sites are just not viable. A pragmatic approach is therefore needed to help bring these sites forward, meeting as many planning objectives as possible whilst allowing the developer to make a 'reasonable' profit to develop. In cases where the private sector is unable to bring forward important sites, it may be appropriate for local authorities to consider using CPO powers to facilitate the development of these important sites.

5.1.34 The length of time and amount of work involved in the appeals process is another barrier to delivery which can add significant costs to a scheme. The limited number of inspectors available exacerbates the issue of delays for schemes. Several outer London boroughs have raised this as a concern and would

like the Mayor to lobby the Planning Inspectorate to provide more inspectors to help speed up the process.

5.2 OLC ANALYSIS AND RECOMMENDATIONS

5.2.1 The following section sets out the Commission's analysis of the issues discussed in the previous section on the development potential of large sites through planning and non-planning means. Based on our analysis, we have provided recommendations to the Mayor on matters the Commission feels he should address through the Further Alterations to the London Plan.

Recommendations for Alterations to the London Plan

Development potential of large sites

5.2.2 The Commission recognises the important role of Opportunity Areas and town centres in providing a valuable source of large sites for housing and other types of development. Private sector investment will only go to locations where developers feel the risks and rewards are acceptable and where the local authority culture will help to make the development process smooth and certain. Enabling development of more difficult sites will require meaningful public sector investment, particularly for brownfield sites with abnormal development costs related to contamination, access, lack of infrastructure etc. This is particularly important in the lower sales value areas. These costs can not only make a scheme unviable but can significantly affect its ability to contribute to other planning

obligations such as affordable housing, CIL etc. In addition to the provision of public subsidy to enable these sites to come forward, it is important for local authorities to use other mechanisms such as compulsory purchase powers to help to deliver key sites with development potential. Effective engagement and buy-in from local authority Members as well as senior officer staff is essential.

- **FALP Policy 2.13 Opportunity Areas and Intensification**

Areas: Emphasise importance of partnership working in delivering the development capacity for large sites, including scope for the larger areas to define their own character and support densities towards the top, or in justified exceptional circumstances, above the relevant density range.

- **FALP Policy 2.17 Strategic Industrial Locations:** release of surplus land focused around public transport nodes to enable higher density development towards the top or in justified exceptional circumstances above the relevant density range.

- **FALP Policy 4.4 Managing Industrial Land and Premises:** release of surplus land focused around public transport nodes to enable higher density development while ensuring that, where necessary, land is safeguarded for transport.

Other Recommendations

Support for Medium size developers

- 5.2.3 The Commission strongly supports the need for a mechanism to help bring forward medium sized developers. This could potentially be done through the London Development Panel.

Lobby for more Planning Inspectors

- 5.2.4 The Commission believes the Mayor should lobby the PINS to provide more inspectors to help speed up the planning process.

ENDNOTES

¹ Based on draft Further Alterations to the London Plan

² GLA Barriers to Housing Delivery, 2012

³ Ibid

⁴ Ibid

⁵ Ibid

⁶ GLA SHLAA Viability Assessment April 2014

⁷ GLA Barriers to Housing Delivery, 2012



INDUSTRIAL WAREHOUSE

CHAPTER 6

IMPROVING THE OFFER OF OUTER LONDON INDUSTRIAL ESTATES

6.1 ISSUES / CONTEXT

6.1.1 London's industrial estates provide a valuable source of land for a wide range of different employment sectors and it is estimated that they accommodate over 550,000 jobs or approximately 11 % of London's total employment¹. Structural change in the London economy over recent decades has led to a shift in employment away from traditional manufacturing industries into the service sector. This shift reflects innovation, changing techniques and specialisation as industries move towards the production of higher value goods or become more closely associated with 'services for the service sector' such as those with an emphasis on research, catering or the leisure market. In addition, there is also growing demand for this type of land to accommodate other uses such as logistics, transport infrastructure, utilities and waste to meet London's growing population needs. Industrial areas also accommodate 'non-industrial' uses such as out-of-centre leisure and retail. It is hard to predict the trend in employment in industrial areas as this will be influenced by release of industrial land, efficiencies in the use of sites and future demand for land.

6.1.2 In 2010 there was an estimated 7,433 hectares of industrial land, including 4,900 hectares of 'core uses' such as industry and warehousing, and 2,500 hectares in wider industrial related uses such as waste, utilities, land for transport and wholesale markets². The majority of industrial land (75%) and floorspace (69%) is found in outer London.³

6.1.3 The average vacancy rate within industrial estates is around 10%, which

is a reduction from 12% in 2006 and 14% in 2001. The highest vacancy rates are found in east and north London at 15% and 11% respectively. The average vacancy rate in outer London boroughs (9%) is lower than that for inner London (13%). A study by Roger Tymms & Partners and King Sturge projects that there will be an overall net reduction in demand for industrial land of 470 hectares between 2011 and 2031⁴. This takes into account a decline in demand for general industrial uses but an increase in demand for logistics, warehousing and waste management. It does not however include the demand for utilities, wholesale markets and land for transport as the data for them was unavailable. This obviously complicates the picture in terms of overall demand for industrial land and the study recommends that boroughs undertake their own local assessments to get a clearer picture of demand.

6.1.4 Due to constraints in the quality, availability and nature of the current supply of industrial land, there are local shortfalls in quality modern floorspace and readily available development land, particularly in parts of north, west, south and central London. However, the amount being released across London is significantly higher than is currently being planned for. In 2011/12, 48.83ha of industrial land was released in outer London compared to the 18.6ha annualised benchmark set out in the GLA's Land for Industry and Transport SPG. In 2012/13, this dropped slightly to 41.8ha, however it is still over twice what should be being released. This release, over that which has been planned for, may be due to a number of factors, including the pressure for redevelopment to higher value uses in combination with

the poor quality of some of London's industrial sites and premises. Taking into account the approach of managing the release of surplus industrial land where this has been identified, in order to improve the offer of those less attractive sites there are a range of measures which can be applied to ensure they are more fit for purpose.

Lack of identity

6.1.5 Many industrial estates suffer from a lack of identity. This may be due to a variety of factors including a churn of occupiers over time making their own mark or a lack of accountability in the appearance and upkeep of the area. A wide variety of different types of uses on the same site with different operational requirements may also contribute to a lack of identity, confusing potential future occupiers as to whether particular industrial estates are suitable for their businesses. The branding and marketing of sites may encourage similar uses to co-locate as well as encourage greater custom.

Design

6.1.6 The overall design of industrial estates can fundamentally affect the general functioning and ability of different occupiers to use a site effectively. Some parts of industrial estates or indeed a whole site may need to be reconfigured to ensure the layout of the estate and footprint of units meet the requirement of their users, including ensuring the space within units is flexible for modern industrial purposes. Typical constraints in older stock include insufficiently clear internal ceiling heights (typically 6 metres plus for modern units), poor loading facilities such as lack of on-site loading

and/or dock loading, and inadequate yard space and parking. The orientation and layout of buildings can have significant bearing on climate change adaptation, mitigation and flood risk management. Each unit should maximise the area used for workspace in order to achieve appropriate densities with individual buildings creating an attractive urban edge. By defining a clear and consistent spatial relationship with the street and the public realm, this can help integrate them into the overall structure of the estate in a coherent way.

6.1.7 The layout of industrial estates can also restrict the type of occupiers that may wish to locate there. It is important that the widths of the roads are large enough to accommodate large vehicles, lorries and HGVs. This is particularly important for logistics, distribution and warehouse units. There should also be appropriately designed turning areas for these types of vehicles as well as flexibility in the curtilage of the units. The road network should also enable people to clearly navigate their way around the estates. Safe road crossings are also important, particularly with the movement of large vehicles.

6.1.8 Parking is a major issue for many industrial estates, as many do not have good public transport accessibility, particularly in outer London, and therefore reliance on the car is much more pronounced. Parking areas in industrial estates should be located close to the site entrance from the main road. They should be clearly separated from service yards and be positioned in proximity to building entrances. Where possible, adjacent business units should share parking areas. Operational parking requirements should also be taken into

consideration, including the provision for 'over-night'/'parked up' trucks/statutory rest periods and work force parking.

Environmental quality

- 6.1.9 Many industrial estates suffer from a poor environmental quality. Ambiguous and undefined areas of off-site landscaping can become prone to misuse and antisocial behaviour, i.e. fly tipping and vandalism. Modest investment in hard and soft landscaping, wayfinding and boundary treatments can provide benefits for enhanced security, the environment, biodiversity and the visual appearance of the place including buildings and structures, which sometimes let down the area and can quite often be improved visually without huge costs to make a better contribution. Landscaping and public realm works can also help to reduce the visual and noise impact of parking, service areas and open storage. In particular it can help to break up hard standing surfaces, helping to keep these areas cooler in the summer months through reduced heat absorption as well as creating a more pleasant working environment for people and provide a more professional feel to the place. Sustainable Urban Drainage systems combined with green or brown roofs can also contribute towards flood resilient design and more energy efficient solutions.
- 6.1.10 Appropriate clear signage can also help to improve the environmental quality of industrial estates. Area wide signage should be clearly visible and legible, particularly from distributor roads and the public realm. This is particularly important for larger estates to ensure they are easy to navigate, particularly with larger

vehicles moving around them. Individual company signage should also be carefully considered. This should include reviews of buildings and structures that these are often sited on. There are often industrial landmark structures that can be used to symbolise the strong heritage of areas and can be improved for example by engaging the artistic community as for example in Hackney Wick. Signage should emphasise the scale of buildings and form an integral part of the building's design. Small signboards attached to large façades sometimes makes them difficult to differentiate. Logos and lettering painted directly onto cladding are considered preferable to boards fixed to the façade. The lighting of signage, industrial structures and buildings is also very important as they can create striking features. Many businesses on industrial estates operate 24 hours a day, therefore there may be deliveries or other people try to find premises when it is dark.

- 6.1.11 A number of the outer London boroughs have emphasised their appreciation of the Mayor's support for environmental improvements to strategic industrial locations and have highlighted that they would welcome further such support from the Mayor in helping to fund improvements to London's Strategic Industrial Locations. Blackhorse Lane industrial area improvements including the Blackhorse Workshop funded through the Mayor's Outer London Fund are a good example of the range of high quality interventions involving artists and creative professionals that could be supported in the future by further rounds of Regeneration Funding. There are already a number of business support initiatives like Superconnected Cities and Apprenticeships that benefit SME's across

sectors and localities and the Mayor could combine these with a range of physical interventions under a new Places of Work programme including for example support for affordable follow-on space creation.

Security

6.1.12 A key concern of many occupiers of industrial estates is security. The design and layout of estates should minimise the potential for crime and criminal behaviour. Whilst the security of individual buildings is down to individual occupiers, an area approach to security can benefit all occupiers. Appropriate lighting of individual building as well as the general public realm should make clear which areas are public and private. Access routes, including parking areas, should be clearly defined and well lit. Managed industrial estates can provide additional security measures such as 24-hour on-site security, CCTV and gatehouse, for example SEGROs Premier Park in Park Royal and Greenford Park, Ealing, and secure yard space, for example at Origin Business Park, Park Royal.

Provision of infrastructure

6.1.13 Quality infrastructure is vital to the success of industrial estates and many would benefit from improved provision. Industrial estates should be located close to good quality transport networks and should maximise the use of sustainable transport modes for the distribution of goods including by rail and water. Access to the strategic road network and ultimately the M25 and wider motorway network is vital. Local transport improvements are also essential to improving the offer of industrial estates. Specifically, investment in the

Upper Lea Valley connection to the M25, A23 corridor in south London, A13 corridor in east London and the A2016 in Thamesmead could significantly improve the offer of many industrial estates in outer London. Road accessibility should be assessed locally as well as sub regionally and where improvements are planned, land should be retained for this use.

6.1.14 Good connectivity to public transport routes is also essential. Bus routes in particular can specifically enhance connectivity of estates for workers to nearby residential areas. Bus routes should be routed through the whole site, where possible, this is particularly important for larger estates. Internally, new sites should be designed to be as permeable as possible to enhance access by public transport, cycling and walking for staff and visitors. Qualitative improvements to the permeability of existing industrial areas should also be considered where possible.

6.1.15 The provision of ICT infrastructure to enable industrial estates to meet modern business requirements is essential. Connectivity through high speed broadband networks can help to support a range of businesses including new and emerging sectors.

6.1.16 The provision of on-site facilities such as a cafe or small scale retail providing lunch facilities or top up shopping can also help to attract a wider range of people thereby improving the offer on industrial estates.

Intensification of industrial estates

6.1.17 Qualitative improvements to industrial locations can come about through the

intensification of industrial uses and, where appropriate, through mixed-use redevelopment of surplus industrial land. Innovative solutions to operations and storage, or through greater use of hot-desking and homeworking, particularly in hybrid industrial/office space can help to make more efficient use of land. There are examples across London, and indeed abroad, of the intensification in warehousing. For example a two-storey warehouse by Brixton Estates at Hatton Cross provides full HGV access to the upper floors. In the logistics sector, intensification can also be achieved through high eaves heights and the incorporation of mezzanines. Intensification of industrial uses may also provide scope to deliver other industrial related uses such as waste management and recycling without further land take⁵.

Housing

6.1.18 Previous chapters have set out concerns in regards to the introduction of extending Permitted Development Rights for the conversion of B1 office to residential in relation to town centres. However whilst these concerns are also true for industrial estates, the impacts on businesses and potential residents are much more pronounced. The success of many of these locations, particularly the larger sites with strategic infrastructure relies on the physical separation of uses and it may not always be appropriate for mixed use development. Inappropriate redevelopment of even parts of industrial sites can compromise the offer of the wider areas as competitive locations for industry, logistics, transport, utilities or waste management. Many outer London boroughs have raised concerns over the operational requirements of some

estates, particularly in relation to the 24 hours nature of some estates, whilst at the same time introducing residents into an isolated area lacking in good public transport accessibility, essential community facilities and with a poor quality environment. Early indications are that prior approval applications are being received for buildings currently in active office use rather than for vacant buildings as were intended. This is partly due to higher residential values and means viable business occupiers are potentially being forced out. The impact of losing important employment land is of significant concern for outer London and could potentially influence outer London's ability to provide an appropriate balance between jobs and homes.

6.1.19 Where the redevelopment to other uses such as housing is part of a planned release of industrial land, it is important that the remaining industrial uses are integrated with but physically separate from these sensitive non-industrial uses. It is also critical that access arrangements and materials are carefully designed to ensure that the mix of uses is able to co-exist without bad neighbour issues or conditions on hours of operation being imposed on users.

Concern over range of industrial uses on industrial land

6.1.20 The mix of different types of uses on industrial estates can impact on the ability of different occupiers to function properly. There is concern by some outer London boroughs that some uses are being 'crowded out' by the introduction of quasi-retail uses. Whilst some retail is acceptable and forms an important service to industrial estates such as small

cafes serving the local workforce, more quasi retail units such as warehouse clubs damage the offer of industrial estates by creating large amounts of traffic and congestion as consumers buy products onsite as well as divert expenditure from the town centres.

6.1.21 The change of use to community uses can also have a significant effect on the operational and functioning requirements of industrial estates. In particular the use of buildings for worship can bring considerably large numbers of people into industrial estates, many of which arrive by car. The amount of traffic accessing the estates at once can cause significant delays for deliveries and those trying to access business premises on the estate. Parking on access roads, in particular, can also severely restrict access and circulation of larger HGV vehicles and lorries trying to reach units within the industrial sites, which potentially will be operating throughout the weekend. Parking at these locations is often unregulated and can create dangerous road conditions.

Business Improvement Districts

6.1.22 Business Improvement Districts offer an important mechanism to secure investment in industrial estates to improve their offer. They bring together a range of businesses and levy a tax on businesses in the area to bring about improvements to that area. Investment could be focused on a range of issues, including environmental improvements, anti-social behaviour, adopting roads, etc. There are currently six BIDs in industrial areas in London, of which five are in outer London.

- London Riverside (Havering)

- Hainault Business Park (Redbridge)
- Kimpton Industrial Estate (Sutton)
- Willow Lane (Sutton)
- Garratt Business Park (Wandsworth)
- Argall (Waltham Forest)

6.1.23 There is a lot of support for BIDS in outer London boroughs. Some boroughs have indicated there could be much greater scope for BID involvement in issues such as training and skills given their understanding of what is required locally. Many also believe that additional funding for BIDs would be hugely beneficial.

Assistance for relocations to other business estates

6.1.24 In some industrial estates, a number of businesses may face operational difficulties due to a variety of reasons, including lack of space due to expansion of the business over time, evolution of business practices, current mix of tenants, influx of residential units etc. Scope for businesses to potentially be assisted with relocation where they would be better suited to alternative business estates could greatly improve the overall offer of estates as a whole as this will enable businesses to respond to changing business requirements more effectively. This may include locating businesses nearer to their customer base, their suppliers, or away from estates where their use may be restricted due to residential area proximity, or incompatibility with neighbours. Estates where this has happened successfully

include relocation of businesses in the Lower Lea Valley to Beckton Riverside as part of the Olympics. In the future, there is potential for this as part of the redevelopment of Old Oak Common to the Park Royal Opportunity Area.

6.2 OLC ANALYSIS AND RECOMMENDATIONS:

6.2.1 The following section sets out the Commission's analysis of the issues discussed in the previous section on improving the offer of London's Industrial Estates. Based on our analysis, the Commission has provided recommendations to the Mayor on matters we feel he should address through the Further Alterations to the London Plan.

Recommendations for Alterations to the London Plan

Locational Specific Policy

6.2.2 The GLA's Land for Industry and Transport SPG clearly shows that while outer London as a whole is losing more industrial land than it should, there is an oversupply of industrial land in some parts and more demand than supply in others. It is important that outer London is able to improve the stock of its industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups, businesses requiring more affordable workspace and potential future improvements to transport.

6.2.3 Parts of outer London have provision for economic functions in logistics, waste management, environmental industries, transport functions, utilities, wholesale

markets and some creative industries that are of greater than sub-regional importance. Whilst it is important to safeguard and improve the offer of these sites, it is recognised that there is potential for release of sites in other parts of outer London such as Barking / Havering Riverside, Meridan Water, North Bexley/ Thamesmead/ Upper lea Valley, Southall and Chessington. The Commission recommends that the Mayor has a more locationally specific policy to help manage the release of industrial land in areas of surplus. In particular, the Commission strongly recommends that these releases should be prioritised around public transport nodes and town centres, as these are likely to be the most suitable for dense new housing and supporting social and community infrastructure.

- **FALP Policy 2.7 Outer London: Economy:** provision of flexible premises for SMEs
- **FALP 4.4 Managing Industrial Land and Premises:** managed release of surplus industrial land around public transport nodes to allow higher density development
- **FALP Annex 1: Opportunity and Intensification Areas**

Modern flexible workspace

6.2.4 The Commission believes that the provision of modern flexible workspaces can significantly improve the offer of industrial estates. Ensuring buildings are designed to be flexible to meet modern requirements, including the provision of ICT infrastructure, will help these estates become competitive locations

for a range of business types including developing sectors such as the knowledge based industries as well as for logistics, warehousing, utilities and waste. London Plan policies should be explicit in their support for the provision of flexible buildings in order to meet modern business requirements, ensuring London's industrial estates are fit for purpose.

- **FALP Policy 2.7 Outer London: Economy:** provision of flexible premises for SMEs

Permitted Development Rights

6.2.5 The Government's liberalisation of permitted development rights for conversion of B1 to residential is of major concern to the outer London boroughs. The Mayor has a key role to play in monitoring the impact of such changes including the loss of business space and employment across the capital to inform the Government's consideration of the future of this change to the permitted development regime.

- **FALP Policy 4.2 Offices:** monitor impact of permitted development rights

Other Recommendations

Promotion of more BIDS

6.2.6 The Commission strongly believes in the importance of BIDs in helping to secure investment London's industrial estates. The Mayor should promote the establishment of more BIDs for Outer London industrial estates.

Support environmental improvements in Strategic Industrial Locations.

6.2.7 Through the Outer London Fund, the Mayor could provide further support for environment improvements in industrial locations.

Use it or Lose It

6.2.8 The Mayor should introduce a 'Use It or Lose It' process to force those with planning permission to collaborate with developers, consortium of local builders or the Mayoral Development Corporation to implement schemes or lose their planning permission.

Greater borrowing powers for Councils

6.2.9 The Commission strongly recommends that both the Mayor and boroughs should have greater borrowing powers, including being able to retain stamp duty and other taxes, to encourage them to develop land they own for delivery of low cost housing.

ENDNOTES

¹ URS/DTZ London's Industrial Land Baseline, GLA/LDA, 2010

² Ibid

³ URS/DTZ London's Industrial Land Baseline, GLA/LDA, 2010 and National Statistics: Commercial and Industrial Floorspace and Rateable Value Statistics, 2012.

⁴ Roger Tym & Partners, King Sturge, Industrial Land Demand and Release Benchmarks in London, GLA, 2011.

⁵ GLA, Land for Industry and Transport SPG, 2012



CRICKLEWOOD

**Annex 1 Outer London Commission
members – third session (2013-14)**



Will McKee, CBE, Chair of Outer London
Commission

Alistair Parker, Cushman and Wakefield

Corrine Swain, Arup

Jonathan Joseph, Joseph Partners

Ian Gordon, London School of Economics

Jonathan de Mello, CBRE

Peter Eversden, London Forum of Amenity &
Civic Societies

Chris Goddard, DP9 (ex officio)

Tony Pidgley, The Berkeley Group Holdings
plc

Peter Hendy, Transport for London

Michelle Dix, Transport for London

Alex Williams, Transport for London

Sir Terry Farrell, Farrells

Colin Stanbridge, London Chamber of
Commerce & Industry

Nigel Minto, London Councils

Teresa O'Neill, Mayoral Adviser on Outer
London and Leader LB Bexley

Stephen Alambritis, Leader London Borough of
Merton

Ray Puddifoot, Leader London Borough of
Hillingdon

Chris Robbins, Leader London Borough of
Waltham Forest

Sue Wilcox, Quod

Annex 2: Terms of Reference

The Outer London Commission was established by the Mayor to bring together representatives of:

- Outer London boroughs¹
- Other public sector agencies with an interest in the development and regeneration of outer London
- Sub-regional and similar partnerships (such as business improvement districts)
- Developers and landowners
- Experts in the fields of planning, economic development and development finance
- The GLA Group (including Transport for London)

to develop policy recommendations to help enable outer London to realise its economic, social and environmental potential and play a full part in London's continued success.

The Commission's originating terms of reference are to:

- i Identify the extent to which outer London has unrealised potential to contribute to London's economic success, the factors that are impeding it from doing so and the economic, social and environmental benefits that could be achieved.
- ii Recommend policies and proposals for the future development of Outer London to the Mayor for inclusion

in the London Plan, its associated supplementary guidance and other GLA Group strategies and guidance. These should include:

- Ways of encouraging employment growth in outer London
- Ways of identifying, and supporting the development of major and secondary economic growth hubs in outer London. The Commission may want to suggest particular appropriate locations or establish criteria to designate such locations.
- The role of town centres and town centre-based initiatives such as business improvement districts, town centre partnerships etc.
- The part that heritage and urban design issues (eg appropriate locations for tall buildings) might play
- Clarify the links between housing, retail, office-based and other types of employment and development in outer London
- Links and tensions between economic success and improving quality of life in outer London, and ways of managing these effectively
- Infrastructure and other investment required to support economic growth in outer London. This may include a preliminary estimate of the order of investment likely to be required, relative priorities and the timescales and innovative approaches to transport and parking.

- Means of funding such infrastructure and investment
 - Any issues that are presented by the relationship between outer, inner and central London
 - Any issues that are presented by the relationship between outer London and neighbouring areas outside London in the East and South-East of England.
 - Any other issue identified by the Commission as meriting consideration.
- iii Make general and place-specific recommendations about implementing the policies and initiatives, including:
- improving the current arrangements for sub-regional working
 - encouraging more effective joint action by boroughs, the GLA Group, other public sector agencies and the private and not-for-profit sectors.
 - ways to make public, private and third sector partnerships to secure investment and development in outer London more effective.
 - establishing more effective dialogue with neighbouring regions to secure co-ordinated economic development of outer London and neighbouring parts of the wider metropolitan area.
- iv The Commission will work with other outer London stakeholders in the private, public and voluntary sectors to ensure the widest possible support for the Commission's recommendations and proposals.
- v The Commission's reports should be evidence-based, drawing on the information about economic, demographic, social, environmental and other data held by the GLA Group and other organisations.
- vi The Commission's secretariat will be provided by the Greater London Authority, with input from other parts of the GLA Group as may be required.
- Occasional advice**
- vii In line with its original terms of reference retained above, the Commission has submitted two reports providing recommendations on the replacement of the 2008 London Plan, subsequent Alterations to it and associated Supplementary Planning Guidance. In light of this advice and in particular the Commission's recommendation that the Mayor reconvene it on an occasional basis to address issues on which he requires further, specific guidance, the Mayor now asks for such advice on the following issues to inform finalisation of the Town Centres SPG and preparation of a further Alteration to the London Plan:
- In light of its earlier retail recommendations and those of Mary Portas; substantial projected population growth, continued employment growth and the more general need to enable sustainable economic growth to support recession recovery; and the Mayor's wider objectives for London as a whole, the Commission is asked
-

to explore whether Londoners will be better served by substantially increasing (and/or qualitatively improving) the retail offers of key town centres in outer London.

As an initial basis for this investigation, it was initially suggested that the Commission might investigate if and how these objectives could be addressed by:

- significantly expanding the capacity of Hammersmith/White City, Brent Cross, Stratford and Croydon;
- significantly expanding the capacity of four other big centres with potential for growth in ways which will address the Mayor's wider objectives eg Uxbridge, Romford, Kingston, Bromley; OR
- improving the quality/increasing productivity of the current configuration of Metropolitan and Major centres, perhaps in association with a 'trend based' increase in development capacity.

The GLA has now commissioned independent borough based consumer expenditure (and, for comparison goods, floorspace) projections to inform this process in the context of a more general assessment of retail need. These show an abatement in the level of growth anticipated by the 2011 Plan and raise particular issues associated with the growth of multi-channel/internet shopping which could have implications for the future configuration of the town centre network. The Commission's work should also be informed by the more general agenda for London's future growth outlined in the Mayor's 2020 Vision.

- Updating, and making more relevant to Outer London, guidance on improving and managing the night time economy as indicated in the draft Town Centres SPG
- Realising the potential and improving the offer of outer London's trading estates and other areas of industrial land, taking into account the approach currently outlined in the London Plan and associated Land for Industry SPG, and the general direction for future economic growth outlined in the Mayor's 2020 Vision.
- Provide detailed guidance on how to more effectively bring forward for housing and other development the substantial stock of brownfield land in parts of outer London. This could usefully draw on independent research into the 'barriers to delivery of housing' and the Mayor's 2020 Vision, not least to meet what is likely to be a major increase in London's housing requirements.
- Identify and develop mechanisms to realise the housing potential of outer London's town centres, complementing the Commission's recent advice on housing densities in more suburban areas, detailed guidance on housing quality and the general direction of travel for future growth outlined in the 2020 Vision. The latter underscores the importance of higher density, town centre based provision in meeting a major increase in London's housing requirements.

Working arrangements

- viii A major part of the Commission's work will be in testing guidance in the draft Town Centres SPG as part of the consultation process, as well as providing a more strategic steer on accommodating the implications of substantial projected population growth. It is anticipated that the latter may be flagged in a forthcoming Alteration to the 2011 London Plan.
- ix To facilitate the Commission's work and enable partners to take account of the new retail expenditure projections, consultation on the Town Centres SPG has been extended to early summer 2013. Other proposed working arrangements for the 2013 session of the Commission's work will be agreed at its first meeting.

ENDNOTES

¹ For this purpose, "Outer London" is taken to mean the area recommended by the Commission and set out in the draft replacement London Plan covering Bexley, Bromley, Croydon, Merton, Sutton, Kingston, Richmond, Hounslow, Ealing, Hillingdon, Brent, Harrow, Barnet, Haringey, Enfield, Waltham Forest, Redbridge, Barking & Dagenham and Havering.

Annex 3 Meetings Dates and Responses

5th August 2013 City Hall, Greater London Authority

12th September 2013, Enfield Council Chamber

10th October 2013, Croydon Council Chamber

23rd October 2013, Havering Council Chamber

30th October 2013, Queens Hall, Ealing Town Hall

7th November 2013, City Hall, Greater London Authority

Following on from the meetings held in each of the sub regions, the Commission was very grateful to receive representations from the following organisations:

- London Borough of Bexley
 - London Borough of Brent
 - London Borough of Croydon
 - London Borough of Enfield
 - London Borough of Haringey
 - London Borough of Harrow
 - London Borough of Havering
 - London Borough of Hounslow
 - London Borough of Kingston
 - London Borough of Lambeth
 - South London Partnership
 - London Borough of Sutton
-

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Chinese

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Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਖਤਾ ਕਰੋ:

Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

MAYOR OF LONDON