

Town Centres SPG - Summary of Consultation responses

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
General	General	Various	Overall very supportive of Mayor's continued focus on town centre regeneration in London. Broad support for the SPG and the Mayor's associated regeneration programmes. Concerns about extensive nature of the document in providing strategic guidance for London and several respondents sought a more concise and focussed document. Other respondents sought more guidance on town centre implementation matters and more extensive examples of best practice. A number of respondents felt that key principles would benefit from being highlighted.	Welcome comments. Issues relating to length and strategic focus to be addressed in final SPG.	Final SPG edited, with greater strategic focus including a summary and clearer implementation guidance points. Overall length of document reduced.
General	General	London Assembly	Best practice toolkit and case studies. These can provide policy makers with universal principles and choice of options to consider so that they can implement those that are most suitable for the character and circumstances of their local town centres. SPG should include a detailed section providing such a toolkit. SPG should also integrate a greater range of best practice examples and case studies to help showcase that positive changes can be delivered.	Noted, however SPG not intended to be a detailed best practice guide or case study reference document. In view of comments to make the document shorter and more strategic the number of case studies will need to be restricted. Links to case study material will be supplied.	See selected case studies in document and links to other case study material in Appendix G
1	1.1.3	LB Brent	Definition of town centres in NPPF excludes small parades of purely neighbourhood significance. Guidance in SPG in many cases is equally applicable to neighbourhood centres as town centres. Would be beneficial if introduction of SPG states to what extent the guidance is applicable to neighbourhood centres	Support. SPG to indicate that definition of town centres includes neighbourhood and local centres	See paragraph 0.9
1	1.2.1	English Heritage	The intrinsic heritage value of London's historic town centres should be recognised in this paragraph	Heritage addressed in several sections of the SPG	See paras 1.2.4, 1.2.7, 2.2.3, 5.1.7 and 5.4.4.
1	1.2.1	CPRE London	Section needs to include a reference to promoting liveability and green spaces in town centres - providing a central hub that supports community wellbeing and prosperity	Support	Reference to liveability in SPG summary and section 1.4. References to green space in 3.1.3 and to community hubs in Summary and in summary and para 3.2.1
1	1.2.2	South London Partnership	SPG tends to contradict sentiment regarding future mixed use development in town centres by reaffirming role of retail. Guidance should focus on creating a mixed and sustainable vision for town centres. Centres should be charged with responsibility to create a vision based upon collective capacity of the network to create a series of centres that balance needs of the local with wider long term viability of the region.	SPG promotes diversification with retail as part of a wider mix of sustainable uses.	See section 1.1 - 1.5
1	1.2.2	LB Hackney	Supports advice that retail should remain core function whilst supporting broader functional base	SPG promotes diversification with retail as part of a wider mix of sustainable uses.	See section 1.1 - 1.5
1	1.2.2	LB Richmond upon Thames	Recognition that London is different from the rest of the country is welcomed as is recognition that retail development should remain the focus of town centres, and that policies should prevent loss of essential convenience shopping.	Noted	No change
1	1.3.2	English Heritage	The unique concentration of London's heritage assets should be recognised, including its four world heritage sites, its internationally recognised landmarks and its culturally rich and attractive centres	Strategically significant clusters of heritage noted in para 1.2.4	See para 1.2.4
1	1.3.3	English Heritage	The challenge of accommodating London's growth within London's historic centres through constructive conservation, and maintaining attractive historic townscapes views, landmarks. Opportunity to secure investment and meet conservation objectives through growth	Heritage addressed in several sections of the SPG	See paras 1.2.4, 1.2.7, 2.2.3, 5.1.7 and 5.4.4.
1	1.4.1	Inclusion London	The principles of inclusive design and Lifetime Neighbourhoods are absolutely core to ensure town centres are accessible to all. Therefore attention should be drawn to these policies under the National Policy Context section. Inclusion London suggests that some of the key points regarding inclusive design, which are well made under the section on Access and Inclusion, are included in the National Policy Context	In light of consultation responses, the National Policy Context will be edited down in the final SPG to avoid repetition of national policy. Key points on inclusive design will be made in Access and inclusion section.	See sections 3.2 and 3.3
1	Figure 1	LB Waltham Forest	Highams Park should be promoted to District centre on completion of 5,100sqm Tesco.	Figure 1 is based upon the adopted 2011 London Plan. This is a matter for Further Alterations to the London Plan.	No change
1	Figure 1.2	Arup	Suggest delete Figure 1.2 and retain Figure 8.1 map of the SOLDCs	Support	SOLDC map Figure 8.1 retained (renumbered 7.1). Figure 1.2 removed to avoid duplication
2	2.0.1	LB Enfield	Agree with guidance requiring a structured analysis of the range of activities, uses and facilities in town centres.	Noted	No change
2	2.0.1	London Assembly	Town centres must serve new functions if they are to continue to be successful and relevant. Different functions provided by town centres should include: public and community services; third-place working; leisure and entertainment; and housing. SPG should highlight in greater detail the need to improve and diversify land uses in town centres.	Support. SPG provides comprehensive section on the range of town centre land uses. Final SPG to emphasise more strongly the importance of diversification.	See summary and section 1
2	2.0.1	Environment Agency	suggest that reference is made in this section, to the role of parks, open spaces and urban greening in town centres, and where relevant, to the 'blue ribbon' network of rivers. These uses and spaces improve the attractiveness of town centres, promote investment and the green economy, support sustainable access, and help deal with health issues which may concentrate in town centres such as poor air quality, ambient noise, urban diffuse pollution, and land contamination	Noted – this section cuts across Section on Quality and on balance considered more appropriate to deal with open space and public realm under Quality.	See section 3.1
2	2.1.1	CRPE London	This section should refer also to planning for green infrastructure and urban greening (London Plan policies 2.17, 2.18, 5.10 & 5.11)	These matters are considered in the quality section 4.	No change
2	2.1.1	LB Tower Hamlets	Support approach to ensure retailing remains core function of town centres although could be undermined by Govt changes to pd rights.	Noted. Include commentary on Govt proposals for permitted development rights retail to residential.	See revised section 1.1
2	2.1.1	LB Wandsworth	Support importance of retail as a core function of town centres along with critical mass of retail - reflects NPPF requirement for primary and secondary frontages.	Noted	See revised section 1.1

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2	2.1.1	LB Wandsworth	For balance retailing section would benefit from overview of retail development trends/retailer preferences - ie move away from smaller comparison goods stores on high street towards larger floorplates, especially within malls.	Noted	See revised section 1.1
2	2.1.10	LB Southwark	SPG should provide greater steer to guide local authorities in addressing the projected change in retail climate.	Noted	See revised section 1.1
2	2.1.12	LB Hackney	Council would emphasise that given resourcing constraints it may not be possible for the authority to resource research studies/estimates of need. Joint working is welcomed.	Noted	See revised section 1.1
2	2.1.12	Royal Borough of Kensington & Chelsea	Welcome nature of strategic retail needs assessment currently being completed by GLA.	Noted	No change
2	2.1.12	LB Wandsworth	Text should acknowledge that different methodologies can be acceptable and borough level RNAs which include householder survey information would provide more robust evidence base than the broader London-wide RNA. Map on page 33 should be deleted.	Noted	See revised section 1.1
2	2.1.16	LB Redbridge	Helpful guidance regarding land use and hierarchy of centres, particularly in relation for priority to retail as core function.	Noted	See revised section 1.1
2	2.1.2	LB Enfield	Remodelling would be required to take account of more recent trends	Noted	See revised section 1.1
2	2.1.2	Transport for London	Note recent report by Centre for Retail Research (CRR) forecasting share of on-line sales will rise from 12.7% to 21.5% by 2018.	Noted. SPG to include references to other sources on projected internet spending growth	See paragraph 1.1.3
2	2.1.2	Key Property Investments	There is an increasingly polarised retail market. In many instances there is a need to reduce the amount of retailing space and find alternative uses. There are other locations where customer footfall and retailer demand is strong and therefore significant growth can be anticipated. Complexity of delivery and challenges of creating viable schemes should be acknowledged and make clear that a flexible approach to development management policies is encouraged.	Noted - references added to increasingly polarised market	See summary and revised section 1.1
2	2.1.2	South London Partnership	Request clarity on relationship between the new study and the SPG, the way it will bear on identifying capacity for new floorspace and the type of centre where it should be located.	SPG updated with evidence from Experian study and other research.	See revised section 1.1
2	2.1.2	London Forum of Civic and Amenity Societies	Section and maps will need revision in light of revised retail floorspace need assessment.	Noted	SPG section 1.1 updated to reflect latest Experian research
2	2.1.2	LB Croydon	Welcome the review of the forecasts and publication of borough level data	Noted	SPG section 1.1 updated to reflect latest Experian research
2	2.1.2	LB Hammersmith and Fulham	Update to reflect latest GLA retail demand projections	Noted	SPG section 1.1 updated to reflect latest Experian research
2	2.1.21	LB Hackney	Advice about the continuing presence of independents alongside multiples is welcomed.	Noted	No change
2	2.1.21	LB Hammersmith and Fulham	Paints a very one-sided view in favour of small-format supermarkets - consider impacts such as diversion of trade from local independent shops.	Noted - text to be amended to reflect balance	See paragraph 1.1.14
2	2.1.21	LB Islington	Paragraph is weighed too heavily in favour of supermarkets and fails to consider the benefits of independent retailers.	Noted - text to be amended to reflect balance	See paragraph 1.1.14
2	2.1.22	LB Islington	SPG should provide a general presumption against the amalgamation of smaller units.	No one size fits all approach - depends on local circumstances and supply/demand for units of different sizes and need for better configured space.	See paragraph 1.1.14
2	2.1.24	English Heritage	EH has also published guidance to assist in planning for retail development in historic areas, available at: www.english-heritage.org.uk	Noted	See paras 1.2.4, 1.2.7, 2.2.3, 5.1.7 and 5.4.4.
2	2.1.24	LB Southwark	Historic big box retail developments often created negative adjacency effects through servicing and access needs, blind facades, badly configured refuse arrangements and car parking. New supermarket developments often combine retail with high density housing and because of the scale of these developments, access and servicing arrangements can be addressed holistically, providing an improved urban design and housing environment. SPG could acknowledge that viable solutions sometimes require larger scale perspective beyond individual site ownerships to achieve comprehensive regeneration - to deal with transport, parking and provide additional public realm benefits.	Agree - text to be amended to reflect these considerations	See new section 2
2	2.1.27	LB Southwark	Guidance could be broadened in relation to findings of Experian assessment of retail need and lower growth of retail spend	Noted	SPG section 1.1 updated to reflect latest Experian research
2	2.1.28	English Heritage	When considering changes of use, local authorities should have regard to impacts on historic significance, for example, where a building has been designed specifically for a particular use. As required by NPPF paragraph 126, Local Authorities should "take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation"	Noted. Covered in NPPF.	See paras 1.2.4, 1.2.7, 2.2.3, 5.1.7 and 5.4.4.
2	2.1.28	LB Hammersmith and Fulham	5th bullet should refer to new temporary permitted development rights.	Noted	See para 1.1.15
2	2.2.10	LB Hammersmith and Fulham	Support Mayor's position on betting offices. Council would welcome more control over the location and prevalence of such uses.	Noted and guidance strengthened	see section 1.2
2	2.2.10	NHS London Healthy Urban Development Unit	Support need to control betting shops. Para 2.2.10 could refer to potential use of Article 4 directions to remove permitted changes of use to betting shops.	Noted and guidance strengthened	see section 1.2
2	2.2.11	Just Space	Guidance should include positive support for healthy food shops	Access to healthy food is covered in the SPG	see sections 1.2 and 3.2
2	2.2.11	LB Brent	SPG emphasises positive aspects of takeaways but does not make reference to the 'case for action' included in the toolkit which provides a useful overview of the research and evidence on the public health impacts.	Noted - add ref to health impacts	see para 1.2.33-34

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2	2.2.11	LB Bromley	The Council welcomes any additional Planning Guidance which can be used alongside existing planning policies to ensure retail frontages are not overwhelmed by A5 uses.	Noted and guidance strengthened	see section 1.2
2	2.2.11	LB Hackney	Welcome Mayor's recognition of concern about clustering of hot food takeaway outlets.	Noted and guidance strengthened	see section 1.2
2	2.2.11	LB Newham	Council is pleased to see hot food takeaways issue raised. Main issues are the number and concentration, the impact and loss of more appropriate town centre uses, and issues associated with noise, odour, litter, anti-social behaviour, breaches of immigration and minimum wage legislation and substandard residential accommodation. The effect on public health is well documented. Council takes issue that SPG over emphasises positive benefits of takeaways relative to disadvantages. Support a more restrictive approach and acknowledgment that some boroughs are disproportionately affected.	Noted and guidance strengthened	see section 1.2
2	2.2.11	LB Redbridge	Guidance on takeaways is welcomed	Noted and guidance strengthened	see section 1.2
2	2.2.11	LB Southwark	Support inclusion of section on hot food takeaways. SPG could also mention associated problems of litter and noise and costs to local authority in terms of cleaning and enforcement.	Noted and guidance strengthened	see section 1.2
2	2.2.11	LB Tower Hamlets	While hot food takeaway toolkit is being developed, there is no specific support for regulatory or planning measures to control the proliferation of hot food takeaways.	Noted and guidance strengthened	see section 1.2
2	2.2.11	NHS London Healthy Urban Development Unit	Support need to control clustering of hot food takeaways due to adverse impact on diet, eating behaviour and obesity. Should be part of a co-ordinated approach to tackle unhealthy diets and obesity working with local takeaway businesses and food industry.	Noted and guidance strengthened	see section 1.2
2	2.2.12	LB Hammersmith and Fulham	Support Mayor's approach to hot food takeaways and publication of the toolkit.	Noted and guidance strengthened	see section 1.2
2	2.2.13	Arup	Useful signposts to other documents indicating the scope for action e.g. Camden's revised SPG on managing the night-time economy (page 43), use of the takeaway toolkit (para 2.2.13).	Noted	see section 1.2
2	2.2.14	London Forum of Civic and Amenity Societies	Mention ATCM Purple Flag Award Scheme	Noted - add reference to ATCM scheme	see paragraph 1.2.15k
2	2.2.14	LB Enfield	Guidance on NTE considered to be helpful to enhance nightlife in town centres. However, increased levels of policing is an important factor in encouraging investment and adding to feeling of public safety in town centres.	Noted - covered in SPG guidance on NTE and associated appendix	see para 1.2.15 and Appendix A
2	2.2.14	LB Redbridge	Welcome Ilford's status as NTE venue. Note that Gant's Hill was recently recognised through Purple Flag award.	Noted. Gants Gill matter being considered in FALP	No change
2	2.2.14	LB Richmond upon Thames	Resource implications for LPAs and research programmes of data collection, for example on the NTE.	Noted	No change
2	2.2.14	LB Waltham Forest	Walthamstow town centre AAP encouraging development of cultural quarter and elevation of NTE status of Walthamstow Town Centre should be considered.	For consideration in future alterations/reviews of London Plan	No change
2	2.2.14	London Assembly	Mayor's Questions commitment to support pubs being identified as community assets	SPG contains new sub-section on public houses	See paras 1.2.19 - 1.2.21 and SPG implementation 2.2
2	2.2.16	Arup	Useful guidance on managing the night-time economy , including use of licensing controls with planning (para 2.2.16) – further clues may be available from the recently published West End Commission report	Noted - licensing issue picked up in 1.2.15 and Appendix A	see para 1.2.15 and Appendix A
2	2.2.16	City Corporation of London	Considering the need to protecting residential amenity within the City's residential areas, the City Corporation is concerned by the suggestion that "night time quarters" (p.44) may be designated. The City Corporation considers that the need for such designation should be a matter for local determination through the Local Plan.	Definition of quarters is a matter for local plan determination. This is recognized in SPG para 1.2.15g	see para 1.2.15g
2	2.2.16	London Forum of Civic and Amenity Societies	Is viability and role of pubs expanded? More should be made of pubs being the hub of a local community - see NPPF paras 69/70	SPG contains new sub-section on public houses	See paras 1.2.19 - 1.2.21 and SPG implementation 2.2
2	2.2.16	LB Islington	Would like to see more protection offered to pubs. SPG could detail what evidence could be expected to justify loss having regard to NPPF para 70 eg marketing, vacancy evidence, and evidence that historic features of pub buildings are retained and protected.	SPG contains new sub-section on public houses	See paras 1.2.19 - 1.2.21 and SPG implementation 2.2
2	2.2.16	LB Richmond upon Thames	Would be useful to say more on assessing viability of pubs, perhaps referring to the use of the CAMRA guidance	SPG contains new sub-section on public houses	See paras 1.2.19 - 1.2.21 and SPG implementation 2.2
2	2.2.17	LB Southwark	Strongly support section on inclusive leisure.	Noted	No change
2	2.2.24 and 2.2.38	Arup	Welcome encouraging tourism and creative industries as part of the town centre mix in Outer London	Noted	No change
2	2.2.26	Paddington BID	Support need for provision of accessible hotel provision and would welcome great emphasis on this aspect in the guidance.	Noted	No change
2	2.2.30	English Heritage	We welcome the recognition given the historic environment as a key component of London's cultural offer. There may be synergies between historic buildings in need of reuse and the needs of creative industries and events for small, adaptable spaces. This should be recognised in paragraphs 2.2.30, 2.2.35 and 2.2.38	Addressed under cultural quarters	See para 1.2.7
2	2.2.31	English Heritage	It should be recognised that the cultural venues established in King's Cross have been sensitively accommodated in historic buildings following extensive collaboration between the developer, LB Camden and English Heritage.	Noted	See paras 1.2.4, 1.2.7, 2.2.3, 5.1.7 and 5.4.4.
2	2.2.32 and Figure 2.5	Arup	useful maps that inform practical action such as inferring local areas of deficiency in cultural facilities (Figure 2.5) and access to food shopping (Figures 4.1&2)	Noted	No change
2	2.2.37	LB Southwark	Re: creative industries - the Centre for Cities report 'Size Matters' seeks to understand the role of small businesses in driving economic growth in London. It would add value to para 2.3.37 to cite a case study of where incubators or flexible workspace are in demand or have been particularly well managed and a success.	Cross-references to be added GLA work on incubators and accelerators and flexible workspace.	See para 1.3.16

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2	2.2.38	English Heritage	This paragraph should recognise the value of historic spaces to creative industries which often draw on historic character as a means of communicating their ethos and brand as part of delivering commercial success	Addressed under cultural quarters	See para 1.2.7
2	2.2.39	LB Waltham Forest	Development of cultural quarters is supported - being encouraged through the emerging Walthamstow Town Centre AAP.	Noted.	No change
2	2.2.42	English Heritage	We suggest that this paragraph should give greater emphasis to the role that historic and attractive townscapes play in underpinning cultural activity. It is crucial to ensure that new development does not erode historic character which should be treated as an economic resource.	Para 1.2.7 notes that sustained renewal and enhancement of heritage or otherwise distinct townscape can contribute to developing the brand of cultural quarters.	See refs to heritage in paras 1.2.4 and 1.2.7
2	2.2.5	Barclays Bank	Management of uses especially betting shops and hot food takeaways can already be controlled by means outside the Planning System and require no further controls.	Mayor's approach to these uses is set out in the SPG and is considered appropriate given concerns raised by boroughs and other stakeholders	see section 1.2
2	2.2.5	London Forum of Civic and Amenity Societies	Make clear that it is talking about Article 4 Directions (also para 2.2.12)	Text amended	See para 1.2.31
2	2.2.5	LB Brent	This section should also acknowledge the detrimental impact of shisha bars, adult gaming centres and pawnbrokers are having on well-being and the vitality of town centres.	The SPG provides guidance on managing clusters of uses and boroughs are encouraged to determine and manage these in light of local circumstances.	No change
2	2.2.5	LB Enfield	Payday loan and pawn shops should receive specific attention in the SPG	Paragrph on pay day loan outlets has been added. The SPG provides guidance on managing these and clusters of other uses and boroughs are encouraged to determine and manage these in light of local circumstances.	See para 1.2.37
2	2.2.6	Association of British Bookmakers	Welcome that guidance encourages local authorities to work with stakeholders to assess whether certain uses will have a beneficial or detrimental impact. Businesses should be mentioned specifically in para 2.2.6	Noted	Para 1.2.28 amended to refer to 'local stakeholders' (which includes landowners, businesses, communities...)
2	2.2.7	Paddington BID	Support power to limit saturation of a use class within a specific area.	Noted	see section 1.2
2	2.2.8	Just Space	Guidance should provide a definition of what amounts to a 'saturation' of betting shops	This will depend on local circumstances and for boroughs to determine in light of local evidence	see section 1.2
2	2.2.8	LB Tower Hamlets	Suggested that further planning guidance is provided on the issue of betting shops to deal more effectively with their clustering in specific locations.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Brent	Would be beneficial for the SPG to express support for LPAs wishing to take forward Article 4 Directions to prevent an over concentration of betting shops.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Bromley	The Council would welcome any additional Planning Guidance which could ensure there isn't an over concentration of betting shops in high streets.neighbourhood or local parades	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Enfield	Ask that the Mayor be clear that he will continue to press for a change in the Use Classes Order to place betting shops into a separate use class and support boroughs that propose Article 4 directions withdrawing permitted development rights to change to betting shops.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Hackney	Welcome Mayor's recognition of the problems faced by boroughs in controlling the growth in numbers of betting shops in town centres.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Islington	Support stance taken regarding betting shops. There are measures which can be used to help limit and control such uses (text supplied). Measure can also be used to restrict payday loan use as advocated in report by the London Assembly.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Newham	Council is pleased to see betting shops issue raised. Main issues are the number and concentration, the impact and loss of more appropriate town centre uses, and anti-social behaviour.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Redbridge	Guidance on betting shops is welcomed (as far as it is possible to go)	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Southwark	Support appraoach to betting shops. Suggest section is broadened to make reference to pay day loan shops and pawn brokers. SPG could refer to London Assembly Report Open for Business.	Noted and guidance strengthened	see section 1.2
2	2.2.8	LB Waltham Forest	Welcome guidance on clustering of uses such as betting shops and hot food takeaways.	Noted and guidance strengthened	see section 1.2
2	2.2.8-2.2.10	Association of British Bookmakers	Disappointed that betting shops are cited as a leisure use which may have issues related to clustering. Pleased by acknowledgement that leisure uses can promote regeneration, and boost economic growth and employment. Betting shops make a significant contribution to local communities and economies in which they operate (£627m to the regional economy and more than 11,500 jobs in London). Wealth of evidence that betting shops drive footfall in high streets. Bookmakers willing to engage and work pro-actively to tackle any issues in communities.	Para 1.2.25 amended to refer to 'local stakeholders' (which includes landowners, businesses, communities...)	see section 1.2
2	2.3.1	London Assembly	In light of government proposals on permitted development rights to allow change of use from office to residential the Mayor should monitor their impact and consider revising the SPG ni the future to take account of any such impats if necessary.	SPG updated to take into account the Govt flexibilities in change of use and the GLA will monitor the impact of the permitted development rights changes in collaboration with London boroughs.	see paras 1.3.5, 1.3.9, 1.3.11 and SPG implementation 1.3d and e
2	2.3.1	Arup	Perhaps there's a bit too much context in section 2 where it is duplicated in subsequent sections, e.g. on offices (section 2.3 and 3.3.5-8)	Noted	Section 1.3 edited down and duplication removed.
2	2.3.1	Inclusion London	Inclusion London welcomes the emphasis on access for disabled people in the sections on Leisure and Tourism; however, there is little mention of inclusive design/access for all in some other sections. For instance, under Office Development there is no mention of the importance of inclusive design for the employment of disabled people, which needs to be highlighted	Noted. Inclusive access to employment uses is covered in section 3.3 and it is proposed not to duplicate in section 1.3.	See para 3.3.4
2	2.3.1	London Forum of Civic and Amenity Societies	How will this section be affected by Govt office to housing experiment. Strong support for a proactive strategy for retaining the best located, most competitive office floorspace in town centres to provide context for resisting loss of this space through London Borough Local Plans.	SPG updated to take into account the Govt flexibilities in change of use and the GLA will monitor the impact of the permitted development rights changes in collaboration with London boroughs.	see paras 1.3.5, 1.3.9, 1.3.11 and SPG implementation 1.3d and e

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2	2.3.1	LB Enfield	Would be appropriate for the Mayor to set out position for managing potential negative effects of govt pd relaxations which should include use of Article 4 Directions.	SPG to recognise that a number of boroughs have brought forward Article 4 Directions for selected locations to remove the permitted development rights. The impact of the liberalisation of permitted development rights on town centres beyond the exempted areas is being monitored by the GLA in collaboration with the boroughs including impact on occupied as well as vacant office space.	see para 1.3.9
2	2.3.1	LB Islington	SPG could provide support for local authorities who may want to implement Article 4 Directions to remove permitted development rights - this could be criteria base linked to LP policy 4.2.	See above	See above
2	2.3.1	LB Redbridge	Borough believes that it can counter the current status of its office market and replace its old stock to promote contemporary space in locations such as Crossrail corridor and South Woodford.	Noted	No change
2	2.3.11	Just Space	Welcome initiatives to retain existing occupiers of commercial space as well as to attract others.	Noted	No change
2	2.3.13	LB Croydon	A figure of £27 per sqft seems about right for Outer London generally. Analysis in March 2012 by Croydon found £23 per sqft typical rent required to make office development viable.	Noted	No change
2	2.3.2	LB Tower Hamlets	Lack of specific protection for office uses in town centres is of concern in that it has potential to undermine the provision of employment space.	SPG provides proactive support for local policies to address structural change in their office stock in light of strategic and local assessments whilst managing conversion of surplus provision	see para 1.3.5
2	2.3.20	Just Space	Concern conversion of offices will lead to significant decline in employment in town centres	SPG provides guidance on managing surplus offices to other uses. Following Govt liberalisation of pd office to residential conversion the GLA will monitor the impact of this in collaboration with boroughs	see paras 1.3.5, 1.3.9, 1.3.11 and SPG implementation 1.3d and e
2	2.3.20	Key Property Investments	Loss of outdated / surplus offices to provide new residential use is supported. It is important that affordable housing policy is applied flexibly in certain instances particularly as part of complex mixed use development projects where viability is often marginal.	See London Plan housing policies and Housing SPG	No change
2	2.3.21	Arup	Request for more clarity between swaps and credits	Paragraph edited and definitions in Glossary	see para 1.3.12 and Appendix F
2	2.3.21	Just Space	Concerned at leeway given to developers by use of land use swaps and credits - risks undermining LP policies on mixed communities and lifetime neighbourhoods.	Clarity on operation of swaps and credits in para 1.3.12 and definitions in Appendix F	see para 1.3.12 and Appendix F
2	2.3.23	Just Space	Concerned at suggestion that higher value housing serves as justification for conversion of office to housing as a driver of change.	Management of conversion of surplus offices to residential is covered in section 1.3	see paras 1.3.10 - 1.3.11
2	2.3.25	LB Hammersmith and Fulham	Repetition of para 2.3.8	Noted	Paragraph deleted
2	2.3.29	Berkeley Group	Any requirement for the re-provision of commercial space in new developments should only be required where there is demonstrable demand to do so.	Addressed in section 1.3	see section 1.3
2	2.3.29	Just Space	No evidence cited for mixed use principles failing in the past.	Mayor of London. Accommodating Growth in Town Centres. GLA, 2014	noted in para 1.3.18
2	2.3.35	Just Space	We are wary of suggestion that there may be surplus industrial land in and on the edges of town centres.	There is evidence that there is potential surplus industrial land in or on edges of town centres. This should be prioritised for transfer to other uses.	No change
2	2.3.36	LB Wandsworth	Idea that town centres should seek to accommodate new sectors and forms of workspace is supported.	Noted	No change
2	2.3.38	Arup	Welcome encouraging ICT hubs as part of the town centre mix in Outer London	Noted	No change
2	2.3.38	LB Southwark	Support expansion of ICT infrastructure. SPG could also include emphasis on extent to which local people can gain access to this infrastructure in order to reduce digital exclusion.	Noted	No change
2	2.3.7	South London Partnership	SLP notes reference to findings of LOPR12 re: Bromley and Kingston. Potential of Croydon for larger scale office development should be given more emphasis, relating to its very high accessibility and development synergy. Expect SPG to reflect outcome of Govt UCO change to permitted development rights. Remains important that good viable stock is safeguarded for SME growth.	Final SPG to include reference to Govt offices to housing pd which the GLA will continue to monitor in collaboration with boroughs.	see paras 1.3.5, 1.3.9, 1.3.11 and SPG implementation 1.3d and e
2	2.3.7	LB Bromley	It is important that Bromley is considered an important office location in the London Plan given the highlighted need and supporting framework. Any down-grading of Bromley's office offer could potentially affect confidence levels for investment and subsequently undermine the ambitions of the strategic framework.	This will be a matter for consideration in Further Alterations to the London Plan.	Paragraph deleted
2	2.3.7	Just Space	Concern about speculative office development	Speculative office development, where supported by demand, can help provide modern fit for purpose business space. Only a few town centres are identified as having potential for such development.	No change
2	2.4.1	LB Wandsworth	Does text on mixed use development replace that in Housing SPG on the same subject? Housing SPG refers to importance of evidence base, and identifies potential problems of mixed use development.	Text does not replace Housing SPG. Matters concerning mixed use development covered in 1.3.18, 1.4 and section 2.	noted in para 1.3.18
2	2.4.1	Berkeley Group	Support Mayor's objective to revitalise town centres and increase housing delivery as part of this.	Noted	No change
2	2.4.1	CPRE London	welcome the references to including affordable, well-designed (diverse and adaptable forms) and high density housing in town centres and where appropriate conversion of spaces to provide new residential spaces. CPRE London recommends that the SPG calls for good practice in housing design and development through promoting community engagement and green infrastructure, planning and management.	Noted, however it is considered that these matters are best dealt with through wider discussions on housing design guidance	No change
2	2.4.1	London Forum of Civic and Amenity Societies	UCO/GPDO temporary uses and shops to housing consultation - need to be factored in	Final SPG to include reference to Govt offices to housing pd which the GLA will continue to monitor in collaboration with boroughs.	see paras 1.3.5, 1.3.9, 1.3.11 and SPG implementation 1.3d and e
2	2.4.13	Berkeley Group	Welcome encouragement for intermediate homes	Noted	No change

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
2	2.4.15	Liam Hennessy Architects	If there was a general presumption that properties, at least along the major routes, could be increased in height to say eight or ten stories, that could encourage property owners to add significant amounts of residential accommodation above commercial or other existing premises. Unless the existing properties are considered to have special architectural merit, there should be an assumption that Planning Permission for demolition and rebuilding at significantly increased height would be granted.	Noted. Sections 1 and 2 of the SPG to cover the need for a co-ordinated approach to redevelopment to accommodate economic and housing growth through intensification (policy 2.15Cb). Strategies for town centres should be proactive and investigate the scope for intensification at higher densities including for residential development.	See section 1.4, section 2 and section 4.1
2	2.4.15	Berkeley Group	Agree that higher density housing is appropriate in town centres. It is likely that there will be little family housing in centres. Do not agree that there is a reduced need for parking in town centres. Parking provision is important to residents in all locations.	Para 1.4.6 recognises that town centres may accommodate a lower proportion of family homes. Parking addressed in section 4.3 drawing on the flexibilities in London Plan policy 6.13.	See para 1.4.6 and section 4.3
2	2.4.19	London Forum of Civic and Amenity Societies	All references to a 'radius' of 800m should be removed	Support	References to 'radius' removed - see section 1.4
2	2.4.2	South London Partnership	SLP asks that further attention be paid to role of housing development at accessible District and Major town centres identified for regeneration to bring more local footfall to support facilities.	Support	See updated summary, section 1.4 and section 2
2	2.4.2-2.4.3	Berkeley Group	Welcome reference to potential for active elderly accommodation in town centres. These initiatives are important to release under-occupied homes for re-allocation to families. Residents benefit from secure, well-managed town centre development close to shops, amenities and transport.	Noted	No change
2	2.4.3	LB Islington	Emphasis on lifetime neighbourhoods is welcome however there seems to be an acceptance that residential in town centres will only ever be suitable for the fit, young and affluent and/or active, elderly people.	SPG emphasises role of town centres in supporting lifetime neighbourhoods and importance of access and inclusion.	See para 2.2.3, section 3.2 and 3.3
2	2.4.3	LB Tower Hamlets	Recognise that housing in town centres may be more suited to young/single people especially as it is difficult to provide appropriate level of amenity needed by families on constrained sites.	Noted	No change
2	2.4.4	Arup	Welcome reference to residential in the town centre mix	Noted	See section 1.4 and 2
2	2.4.6	NHS London Healthy Urban Development Unit	SPG should give greater emphasis to need to provide new or improved social infrastructure to support housing growth in town centres. Provision of healthcare in town centres could help deliver NHS aims to improve access to primary healthcare and recognise that partnership working is required to deliver.	Cross-reference to be added to social infrastructure section	Cross-reference added to social infrastructure in para 1.4.3
2	2.4.6	Inclusive London	Under the housing section we would recommend that the importance of Lifetime housing and inclusive design is highlighted. Also, while Inclusion London welcomes the commitment mentioned in the SPG to increase affordable housing in town centres, we would like to see an equally firm commitment to building more social housing in town centres within London. Disabled people and others that depend on social housing should not be pushed to the outer edges of London or beyond the M25	Inclusive design and affordable housing addressed comprehensively in London plan Policy. See also Housing SPG.	No change
2	2.4.6	LB Bromley	Welcomes acknowledgement of residential issues but also consider that development should respect amenity of the future occupants	Noted.	see para 1.4.3 and section 2.2
2	2.4.7	LB Hammersmith and Fulham	Update to reflect changes to pd offices to residential	Text updated to reflect changes to pd offices to residential	see para 1.4.11-1.4.13
2	2.4.8	LB Bromley	Council considers that surplus office space would be suitable for some affordable purposes - even if restrictions are placed on family homes.	Affordable housing addressed comprehensively in London plan Policy. See also Housing SPG.	No change
2	2.4.9	Berkeley Group	Redevelopment can also deliver a higher standard of new accommodation, improved residential amenity and design quality.	Noted. Reference to quality added to para 1.4.12	See para 1.4.12
2	2.5.10	Helen Hamlyn Centre for Design	Pleased by how much the Draft Town Centres SPG mentions toilets and encourages boroughs to have a strategy etc. The Mayor's scheme is actually called 'Open London' (however, Open Toilets is a better name). There's a British Standard for public toilets to consider - BS6465. The issue of gender inequality is still overlooked in planning, in my opinion. In places where equal numbers of men and women visit, Female provision should be double male provision, as it takes women twice as long on average to use the facilities. Family toilets could also be considered, making it easier for people with young children.	Noted. Reference to be amended to read 'Open London' toilet scheme. Good point on ratios f to m - should be considered generally not just specific to town centres	Reference amended to read 'Open London' toilet scheme in 1.5.2f
2	2.5.10	LB Islington	Welcome mention of Changing Places WC but should clarify these are for assisted use.	Noted	Clarification 'for assisted use' in footnote to para 1.5.2f
2	2.5.11	London Assembly	Evidence suggests that partnerships between the community, businesses, property owners and service providers – especially Transport for London (TfL) and public services like the NHS – could be a crucial way to plan and implement a combination of structural changes and environmental improvements	Noted - references added to para 1.5.2 and in section 6.1 under collaborative working	See para 1.5.2 and section 6.1
2	2.5.12	MOPAC/MPC	Suggested that typical unit size is not provided as such units may also need to incorporate safer neighbourhood team bases at ground or first floor level and require a larger unit	Para 1.5.2 amended to read envisage a number of these in each borough. The floorspace requirements will vary and be considered on a case-by-case basis to reflect operational policing requirements and the Local Policing Model for the Borough.	See para 1.5.2g
2	2.5.12	LB Richmond upon Thames	It is beyond the remit of this guidance to suggest local authorities should facilitate these within key retail frontages or community buildings.	see above	see above
2	2.5.14	London Assembly	Libraries an example of flexible 'third space' working	Support	Reference added to 'third space' working in para 1.3.16
2	2.5.2	London Forum of Civic and Amenity Societies	Need to focus any reconfiguration of the supply of social infrastructure to town centres as an accessible location.	Support	See para 1.5.1
2	2.5.2	London Fire and Emergency Planning Authority	We fully support inclusion of fire stations within the definition of social infrastructure facilities as we consider fire stations and ancillary premises to be community safety facilities which are included in the wider definition of infrastructure in the Planning Act 2008.	Included in community safety facilities	No change
2	2.5.7	LB Tower Hamlets	Strong support of multi-use facilities to act as focus for town centre regeneration	Noted	No change

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
2	2.5.7	MOPAC/MPC	Paragraph would be more effective where there is requirement to demonstrate alternative social infrastructure provision is 'realistic and viable'. The test should only be applied where no alternative facilities have been provided.	See amendments made to para 1.5.2	See para 1.5.2g
2	2.5.7	NHS London Healthy Urban Development Unit	Support multiple use of premises and co-location of services in town centres.	Noted	No change
2	2.5.9	NHS London Healthy Urban Development Unit	Suggest adding primary and community healthcare facilities to list of social infrastructure types.	Support	See para 1.5.2
2	Figure 2.1	LB Bexley	Figure 2.1 allocates between 40,001 and 60,000 sqm net sqm comparison goods retail 2011-2031. Bexley's own capacity study identifies 29,279 sqm. Figure to be revised in a forthcoming Bexley Retail Capacity Study.	Noted	Map removed from final SPG.
2	Figure 2.3	LB Bexley	Figure 2.3 allocates 30,000 sqm net pipeline at Crittalls Corner. Confirm amount is 15,007 sqm.	Noted	Map removed from final SPG.
2	Figure 2.4	City Corporation of London	Figure 2.4 includes the City within a Strategic Cluster of Night-Time Economy of International Importance, seemingly giving the City the same status as the West End. Whilst we are encouraging a more diverse economy in the City, we are trying to manage the night-time economy, particularly to prevent disturbance to residents within our residential areas. We believe that any designation of the City in Fig 2.4 should be limited to the Strategic Cultural Centre of the Barbican, which itself should be identified as an area of more than local importance. Other parts of the City should then be identified as having a night time economy of local importance.	Figure 2.4 is based upon Annex 2 of the London Plan. No centres in the City are designated as being of International significance in the London Plan – it is accepted that the map is potentially misleading in this respect. Propose to remove map and refer to Annex 2 of the London Plan.	Figure 2.4 removed and reference to London Plan Annex 2 inserted
2	Figure 2.7	LB Croydon	Question why Croydon not identified in category A	Figure 2.7 is based on Annex 2 of the London Plan. LOPR12 suggests LP categorisation for Croydon remains robust.	Map removed from final SPG.
3	3.1.1	Royal Borough of Kensington & Chelsea	Welcome continued support of town centres first approach	Noted	No change
3	3.1.14	LB Redbridge	Welcomes guidance on managing capacity and growth and concurs with inclusion of Ilford as a town with capacity for growth.	Noted	see section 6
3	3.1.5	LB Enfield	Impacts would need to be capable of finer grained management particularly for local and neighbourhood centres. <u>Allowing boroughs to adopt lower threshold for impacts on smaller centres would be beneficial</u>	Noted	see para 6.3.4
3	3.1.8	LB Islington	First two bullets of 3.1.8 could be combined and refer to sustainable transport modes and the preferred modes of transport.	Reference to sustainable transport modes added	see para 6.3.5
3	3.1-3.4	CPRE London	CPRE London welcomes the 'town centre first' approach to growth as well as revitalising vacant /under-used sites, as well as the resistance for out of centre development and appropriate scale. Recommend previously developed land priority, green infrastructure assessment, planning and management and community engagement.	Note comments. PDL priority is addressed in London Plan. Green infrastructure planning and management in All London Green Grid SPG and cross-referenced from this SPG and community engagement covered in section 6.1	No further changes
3	3.2.10	LB Waltham Forest	Support initiatives to encourage temporary uses of vacant premises such as pop-up shops.	Noted	No change
3	3.2.10	LB Hammersmith and Fulham	Update to reflect recent changes for temporary pd rights.	Noted	See para 5.2.3 and para 1.1.15
3	3.2.11	London Assembly	Add reference to London Assembly Report 'Open for Business'	Reference to be added to Brent case study example, drawn from London Assembly Report 'Open for Business'	See section 5.2
3	3.2.12	Just Space	Boroughs' role should be to support small business to thrive as a component part of town centres	Text in section 1.3 updated to reflect importance of small business space	See section 1.3
3	3.2.12-15	Arup	Useful practical guidance on current challenges e.g. on meanwhile tenancies (paras 3.2.12-15) and brief good practice case studies e.g. on pop-up shops (page 83)	Noted	see section 5.2
3	3.2.16	LB Tower Hamlets	Strong support for references to sensitive application of change of uses to ensure vitality and viability of the town centre and ensure critical mass of retail.	Noted	Text edited - see section 6
3	3.2.16	Berkeley Group	Support encouragement for changes from retail to other uses in areas with significant vacancies or difficult to let units. Vitality of many centres is undermined by them being too large. Smaller better defined centres are better commercially and for customers.	Noted	No change
3	3.2.16	Barclays Bank	It would be a sensible precautionary measure to encourage diversity throughout the entirety of all centres before vacancy and decline has set in, ie not just in "areas with a high level or proportion of vacant or difficult to let units"	Diversity emphasised in section 1	see section 1
3	3.2.16	LB Southwark	Should also include implications of changes to GPDO.	Noted	See para 5.2.3 and para 1.1.15
3	3.2.18	LB Tower Hamlets	Given that neighbourhoods plans need to accord with Local Plan, suggest add 'in accordance with existing strategic policies'.	Noted	Text edited - see section 6
3	3.2.2	Environment Agency	Section could also address under-used and brownfield land.	Noted	See para 5.2.1
3	3.2.2	London Forum of Civic and Amenity Societies	Vacant upper floors of high streets are best used as small offices	Noted	see para 5.2.3
3	3.2.8	London Forum of Civic and Amenity Societies	Upper floors above shops in town centres are often better used as small offices rather than flats.	Noted	see para 5.2.3
3	3.2.8	LB Hammersmith and Fulham	Support Mayor's approach in promoting the use of upper floors above shops for realising housing capacity.	Noted	see para 5.2.3

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
3	3.4.1	English Heritage	We agree that it is important to respect character in determining the scale and format of development, including the location of tall buildings. This should including identifying and protecting townscape views, and the settings of heritage assets, and understanding the contribution made to character by existing historic landmarks. This paragraph should encourage masterplanning to deliver plan-led growth and enhancement through careful consideration of significance. This section should remind Local Authorities to ensure that evidence is available for well-informed planning and decision-making, that site allocations and other local plan documents are informed by an understanding of historic significance.	Noted - these matters are addressed in London Plan policies 7.4-7.12	See section 2.2.6
3	3.4.3	LB Hammersmith and Fulham	Section would benefit from reference to NPPF para 24 flexibility in format and scale of out of centre retail developments.	Support	See para 2.2.7
3	3.4.5	London Forum of Civic and Amenity Societies	Most town centres do not lend themselves to tall buildings as not appropriate in that context. Ensure that assessment of density of development do not add residential density of such a site on top of non-residential uses which results in building of height unsuitable for context.	See amendments to para 3.1.4	See section 2.2.6
4	4.1.1	LB Redbridge	Welcomes concept of under-served areas and support for exploring these issues eg TfL models of ATOS and CAPITAL to supplement PTAL models.	Noted	see section 4.2
4	4.1.1	LB Southwark	Helpful section around under-served markets which could have beneficial impact on reducing health inequalities.	Noted	see section 3.2
4	4.1.10	Just Space	Paragraph should include reference to the importance of independent, owner-run or specialist businesses to lifetime neighbourhoods.	CHECK	see sections 1.1, 3.2 and 3.4
4	4.1.11	Just Space	Not clear what is meant by sterilising uses	Text edited	See revised section 3.2
4	4.1.2	LB Enfield	Support approach linking under-served areas with lifetime neighbourhoods.	Noted	No change
4	4.1.3	London Forum of Civic and Amenity Societies	ATOS is only a broad brush scoping tool - it may not be that useful for defining the gaps in the network/under-served markets.	Amend text to indicate that ATOS useful as a broad brush scoping tool as context for more local analysis	see para 4.2.20
4	4.1.5	NHS London Healthy Urban Development Unit	Support. Could refer to paras 3.2.10-3.2.14 to acknowledge access to fresh food could be encouraged through temporary pop-up shops and meanwhile community enterprises.	Noted - see para 3.2.8	see para 3.2.8
4	4.1-4.2	CPRE London	CPRE welcomes references in this section including to enhancing street design, lifetime neighbourhoods, walkability, connectivity to residential areas. Development should adequately blend into wider neighbourhoods, provide real affordability and link to local amenities and infrastructure. Importance of smart compact communities with retention of high-street value for the benefit of the local economy, society and the natural environment. Issues like investing in design e.g. walkability, green infrastructure, eco-enterprise and fundamentally community ownership.	Noted. The issues raised have been reflected in section 3.2 on healthy and lifetime neighbourhoods, and also elsewhere in the SPG on walkability and access to green infrastructure. Welcome example of St Mary's Secret Garden in Hackney, however the garden doesn't lie within a designated town centre so not appropriate for this SPG	No change
4	4.2.1	LB Southwark	Support	Noted	No change
4	4.2.10	Just Space	Paragraph should offer something clear on need for retail diversity as a component of lifetime neighbourhoods. Paragraph presents a slightly negative view of independent retailers suggesting they face challenges in providing a range of goods. Often independents respond far better to local demand than small multiples.	Text edited	See revised section 3.2
4	4.2.2	LB Southwark	Highlight pan-London Healthier High Streets working group which shares best practice to improve local high streets.	Noted	See section 5.1
4	4.2.3	Environment Agency	May be helpful to add reference to dealing with site contamination and to refer to green roofs and development site environs.	Issues addressed in section 3.1	See Section 3.1
4	4.2.3	NHS London Healthy Urban Development Unit	Support. Suggest additional bullet to controlling clustering of uses which encourage unhealthy lifestyles such as hot food takeaways and betting shops.	See section 1.2	See section 1.2
4	4.2.5-4.2.11	Arup	Welcome reference to town/district centres as a focus for lifetime neighbourhoods	Noted	No change
4	4.2.8	NHS London Healthy Urban Development Unit	4th bullet should read primary and community healthcare services.	Edited text uses generic term 'health' facilities	see para 3.2.3
4	4.3.1	LB Islington	Islington have developed a methodology for Access Audits in partnership with a disability organisation.	Reference as a good practice example	See section 3.3
4	4.3.2	London Access Forum and London Access Association	Add cross-references to the range of access considerations mainstreamed elsewhere in SPG	Cross-references added to access considerations covered in more detail elsewhere in SPG	see references in section 3.3
4	4.3.2	Arup	Useful practical guidance on integrating disabled access (e.g. 2.2.17-20, 2.2.27, 4.3.2 & Figure 4.3)	Noted	No change
4	4.3.3	Inclusion London	The importance of pedestrian crossings should be emphasised as they provide the only safe place for many disabled people to cross busy high streets, without them town centres are 'no go' areas for disabled people	Reference added to crossing points	See section 3.3
4	4.4.1	LB Southwark	Support broader functional base in town centres by encouraging diversification.	Noted	See section 1
5	5.3.1	South London Partnership	Mention use of low emission vehicles for urban deliveries and pollution preventing operating practices in town centres (eg restrictions on vehicle idling). Potential to build on existing LEZ regulations to promote efficient operation and low emission vehicles and proactive promotion of electric and plug-in hybrid vehicles for urban distribution / urban public transport services (over and above provision of EV charging points)	See section 3.6 (air quality) and 4.4 (servicing)	See section 3.6 (air quality) and 4.4 (servicing)
4	4.4.2	Just Space	Stronger guidelines needed to support alternatives to small multiples and to support London's local economies.	Text edited	see section 1.1
4	4.5.1	Just Space	Social benefits of small shops should be added - text supplied	Text edited	see section 3.4

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
4	4.5.16	Barclays Bank	implementation of affordable shops policy will be fraught with complications including what type of retailer would qualify for such 'affordable' accommodation; what criteria are going to be set; who decides whether an occupier meets these criteria.	Guidance on affordability set out in 3.4.8 for local determination	no change
4	4.5.16	Association of Town and City Management	Considerations of affordability ought to include not just the rent, but also the terms of the lease, including length and break clauses	Support	Amendment made to 3.4.8
4	4.5.16	LB Islington	Guidance is useful but need to give explicit reference to limitations associated with CDT.	Small shops section edited with single reference to potential for CDTs	See para 3.4.8
4	4.5.17	LB Tower Hamlets	Should provide further guidance on circumstances under which s106 contribution on small shops policy 4.9 may be considered acceptable and meet the three tests in CIL regulations. Recognise local differences in small shops sizes (no more than 100 sqm gross in LBTH)	Noted	See para 3.4.7
4	4.5.4	Arup	Useful additional detail on using the small shops policy (paras 4.5.4-15 & Annex F)	Noted	No change
4	4.5.4	LB Southwark	Support guidance on affordable small shops. In E&C large retail developments (including refurbishments) are to provide a range of shop unit sizes including affordable units suitable for SME independents. Rents should be discounted by not less than a total reduction of 40% below market rate averaged over 5 year period.	Refer to SPD/OAPF work	See case study in section 3.3
4	4.5.4	City Corporation of London	Support paragraph 4.5.4, which permits local authorities to identify a lower threshold for new large retail development other than that defined in the London Plan (2,500sq.m)	Noted	No change
4	4.5.4	LB Brent	Council would welcome a London-wide approach to establishing appropriate impact assessment thresholds	SPG sets out the London-wide threshold (2,500sqm) and acknowledges that in some circumstances retail developments of less than 2,500sqm may give rise to impacts.	see paras 6.3.3 to 6.3.4
4	4.6.1	Inclusion London	Access to street markets is important to disabled people because markets sell fresh fruit and vegetables that can be less expensive than other sources and disabled people are often surviving on a low income. So we recommend that the importance of accessibility for disabled people is highlighted in this section	Importance of access to markets for food shopping recognised in para 3.5.2	see para 3.5.2
4	4.6.1	LB Waltham Forest	Assuring to note positive support to role of street markets in town centres.	Noted	No change
4	4.6.4	LB Islington	Request removal of reference to Chapel Street Market as declining.	Reference to Chapel Market removed	Reference removed from text box
4	4.7.1	LB Southwark	Should be more emphasis upon how 'place identity' can be created in order to help regenerate centres - including strong local links and local visibility and identity, cultural and social history of an area, and its townscape heritage of buildings, streetscape and planting, sense of place and attractiveness.	Noted	see section 3.1
4	4.7.1	London Forum of Civic and Amenity Societies	Quality of public realm and in particular the pedestrian environment is critical to the success of town centres, including making them places people want to be in, whether strolling, sitting out or at a pavement café. Street life, café society, tables and chairs - a major gap/omission if we are promoting revitalisation of our town centres by animating the street environment. Need for Wi-Fi zones in public areas to make town centres more attractive as places to be in.	Noted	see section 3.1
4	4.7.1	LB Southwark	CABE study (Paved with gold, 2007) found direct link between quality of street design, management and maintenance and economic benefits. Walworth Road improvements represented benefit of £286,000.	Section edited	see section 3.1
4	4.7.11	LB Islington	Islington have recently produced a Streetbook SPD. In relation to shared space, there are few circumstances where the removal of a kerb makes a positive contribution to the streetscape.	Noted	No change
4	4.7.12	English Heritage	In (re)designing space in town centres, regard should be had for historic character, for example, the conservation of traditional street materials. English Heritage has published <i>Streets for All</i> to assist Local Authorities in identifying historic materials and characteristics when drawing up public realm schemes. This document should be referenced here.	SPG based on TfL's better streets guidance	See section 3.1
4	4.7.13	Environment Agency	Welcome references to open space, biodiversity and using green and water spaces to manage flood risk and sustainable drainage. Suggest X-ref to SPG on Sustainable Design and Construction.	Add reference to Sustainable Design and Construction SPG in 3.1.10	see para 3.1.7
4	4.7.2	CRPE London	SPG should support adoption of a consistent approach Green Infrastructure investment, as an opportunity to significantly enhance Town Centres and their surrounding areas and refer to how Town Centres will contribute to agreed policy in the London Plan (and NPPF) to promote Green Infrastructure	Noted. Guidance on these matters are dealt with in All London Green Grid and Shaping Neighbourhoods SPGs, however reference to green infrastructure and cross-refs to these SPG could be strengthened.	London Plan policies and All London Green Grid and Shaping Neighbourhoods SPGs referenced in section 3.1
4	4.7.2	English Heritage	An additional bullet point should be added to recognise that in historic town centres groups of heritage assets operate together as historic spaces, and that when considering local character in new proposals, the space as a whole should be addressed, rather than simply individual buildings.	Noted. The term 'heritage assets' in 2.2.3 encompasses both individual heritage assets (buildings, space etc) and groups of such assets	see para 2.2.3
4	4.7.4	Inclusion London	Inclusion London welcomes the acknowledgment that a well lit and accessible environment can decrease crime.	Noted	No change
4	4.7.9	Arup	Suggest document tries to be a bit too comprehensive particularly on techniques that are well understood e.g. streetscape design (section 4) or the process for justifying changes to the town centre network (section 6).	Noted	Section 3.1 edited down
4	4.7.9	English Heritage	Historic Environment: We suggest that an additional historic environment section should be inserted, to fully reflect the points made in paragraph 126 of the NPPF.	Noted, however do not wish to duplicate the NPPF	No change
4	4.8.2	London Forum of Civic and Amenity Societies	Night time guidance - need to bring it together? (NTE, Purple Flag)	Note safer centres not just about night time. Cross-reference added to NTE in 3.1.9	Cross-reference to NTE added in para 3.1.9
4	4.9.13	Environment Agency	Suggest x-ref to Mayor's Climate Change Mitigation and Energy Strategy and Water Strategy. Para 4.9.13 could x-ref LP climate change policies 5.1-5.8.	Noted	X-ref to Mayor's Climate Change Mitigation and Energy Strategy and Water Strategy added in section 3.6

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
4	4.9.17	Just Space	SPG should be used as a powerful tool to drive improvements to air quality. Town centre planning should have no adverse effect upon air quality, in line with EU Ambient Air Directive. Search of GLA website did not find the Air Quality Street Design Toolkit.	Air quality section edited	See section 3.6
4	Figure 4.1 and 4.2	Arup	Useful maps that inform practical action such as access to food shopping (Figures 4.1&2)	Noted	ATOS map retained
5	5.1.1	London Assembly	Land use and transport planning. Planners must recognise the opportunities for higher density mixed use development around stations in the mid and long term. SPG should emphasise the links between transport planning, land use planning and regeneration opportunities for town centre transport interchanges.	Support. These linkages are addressed in various sections of the SPG (including housing and transport sections). GLA will consider how these aspects can feature more prominently in these sections in the final SPG.	see section 4.1
5	5.1.16	Transport for London	Modal split is an important consideration for planning any town centre and should be reflected in the document	Support	see section 4.1
5	5.1.20	LB Wandsworth	Would be useful here to note the importance of low-polluting buses in the contracting process for town centre routes.	Air quality section edited	see section 3.6
5	5.1.20	Transport for London	SPG contains insufficient detail on buses. TfL recommend additional wording (text supplied).	Noted, detail added	see section 4.2
5	5.1.22	LB Southwark	Would support more of an emphasis in this section on the creation of a pedestrian focused town centre environment which will inevitably help to attract more visitors and shoppers.	Public realm section edited	See section 3.1
5	5.1.22	London Forum of Civic and Amenity Societies	ATCM/London Councils work on spend, mode and parking should be cited and key findings mentioned.	Reference to spend by mode in section 4.2	See section 4.2
5	5.1.22	LB Enfield	Enfield deserves consideration for cycle infrastructure spending and possibly in longer term the development of local bike hire schemes.	Noted - Nb not matter for SPG	No change
5	5.1.26	Transport for London	Reference should be given to the Mini Hollands programme - text supplied	Support	Reference added to Mini Hollands programme in 4.2
5	5.1.29	Arup	Welcome encouraging cycle hubs as part of the town centre mix in Outer London	Noted	No change
5	5.1.29	London Forum of Civic and Amenity Societies	Should more explicitly seek to improve quality of the pedestrian environment in local centres	Public realm section edited	See section 3.1
5	5.1.3	LB Islington	Note that PTAL takes no account of the accessibility of public transport to disabled people.	This is already noted in footnote to 5.1.3	No change
5	5.1.3	South London Partnership	Redevelopment and construction of new buildings offers the opportunity to design new infrastructure, systems and ways of working that are more difficult to retrofit to an existing development. This applies to both sustainable personal and goods transport.	Noted	see section 2 and 4.4
5	5.1.32	LB Wandsworth	Should also be noted that in some town centres, main roads on the TfL Road Network have a significant severance effect eg Wandsworth town centre.	See section 4.2	See section 4.2
5	5.1.36	LB Wandsworth	Section on parking should mention role played by flexible modes of car use, for example car clubs or point-to-point car sharing.	Covered in para 4.3.5	No change
5	5.1.42	CPRE London	CPRE London agrees that London town centres need to continue to improve local transport connectivity, as well as London-wide movement particularly in terms of improvements to access to public transport options, walkability, and cycling infrastructure. Recommend including adoption of 20mph speed limits in town centres	Approach to 20mph zones set out in SPG Land for Industry and Transport SPG.	No change
5	5.1.42	LB Islington	Safer and inclusive streets - including speed limits, vehicular exclusions, on street parking could be given as good practice.	Noted	See updated section 4.2
5	5.1.6	LB Enfield	Council supports this part of the guidance which examines how access to town centres can be improved through the delivery of strategic transport projects and the use of TfLs accessibility measures eg ATOS	Noted	No change
5	5.2.1	Key Property Investments	Ensuring appropriate levels of car parking in town centres will be crucial to their longer term health. The overly restrictive application of maximum parking standards can undermine regeneration particularly where out of town retailing offer is strong. Guidance should make reference to vitality and commercial viability considerations.	London Plan policy applies	No change
5	5.2.1	Transport for London	Introductory section would benefit from short paragraph on the need to consider parking in context	See paragraph 4.3.12	Section 4.3 edited and reference to wider planning concerns added in 4.3.12
5	5.2.1	LB Islington	Vehicle parking given too much prevalence in section 5.2. More clarity should be given that car parking should only be provided in Inner London boroughs where it can be demonstrated that it is essential for operational requirements.	Sustainable modes covered in 4.2. Parking including differences between inner and outer indicated in section 4.3	see section 4.3
5	5.2.11	Inclusion London	The importance of a fully accessible environment from the car parks to the high streets needs to be highlighted in the section on parking as wheelchair users with mobility vehicles will wish to use car parks	Noted, however this is covered more comprehensively in section 4.3	See section 4.3
5	5.2.17	LB Redbridge	Note support offered for boroughs regarding appropriate levels of parking for offices.	Noted	No change
5	5.2.22	Transport for London	Availability and cost of car parking do not alone dictate the fortunes of high street and any parking strategy must support and be integrated with a broader land use planning approach to the town centre and the area it serves. LP policy 6.13Ec applies to public town centre car parking and 6.13Ed to offices in outer London.	Policy references to be added for clarity	Parking section 4.3 edited. See especially 4.3.11-16 (town centres) and 4.3.18-19 (re: office parking). Reference to wider planning concerns added in 4.3.12.
5	5.2.26	London Forum of Civic and Amenity Societies	Identify need for parking for cinemas	Noted. Covered in general in section 4.3	see edits to section 4.3
5	5.2.28	Transport for London	SPG could give more explicit support for encouraging shared use rather than parking for individual developments in 5.2.8 (as well as 5.2.28) noting para 6A.4 of LP states that if on-site parking is justified there should be a presumption that it would be publicly available.	Agree - text consolidated in 4.3.15	See paragraph 4.3.15 3rd bullet

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
5	5.2.5	Arup	Welcome point on flexibility in Outer London	Noted	No change
5	5.2.5	Transport for London	LP policy 6.13 flexibility applies to public town centre car parking and subject to criteria, offices in outer London. Concern that this section could be misinterpreted as implying it applies to all parking in town centres (eg residential). Applying more focus onto inner London standards could be considered here.	Policy references to be added for clarity	Parking section 4.3 edited. See especially 4.3.11-16 (town centres) and 4.3.18-19 (re: office parking)
5	5.2.5	LB Redbridge	Welcomes a variable approach for parking for inner and outer London reflecting their varying needs.	Noted	No change
5	5.2.8	LB Bromley	Council welcomes need to provide flexibility but does not support PTAL-related maximum residential parking standards.	Policy is set out in London Plan	No change
5	5.2.8	LB Enfield	SPG does not set out a position in relation to edge or out of centre parking. Mayor should seek to tackle problem of free out of centre parking drawing customers away from town centres. For new schemes this might include looking at pricing mechanisms perhaps through management conditions, CIL and s106 and could involve financial contributions towards improving town centre parking or accessibility.	Covered in para 4.3.13	see para 4.3.13
5	5.3.2	Transport for London	Cross ref to Delivery Service Plans is welcome. Ideally strengthen reference about how using DSPs and subsequently amending site operations can deliver broader benefits: better delivery times and reliability, more efficient loads, better air quality etc.	Servicing and deliveries section updated	Section 4.4 edited and reference to DSPs retained.
5	5.3.2	Transport for London	There should be reference to the provision of safe and legal loading spaces for current and future demand, for both businesses and residents	Support	See paragraph 4.4.2
5	5.3.5	South London Partnership	TfL has developed an out of hours delivery code of practice developed for 2012 Games and supercedes QDDS project referenced in 5.3.5	Servicing and deliveries section updated in consultation with TfL	Section 4.4 edited and reference to DSPs retained.
5	5.3.9	Transport for London	Consideration should be given to last mile delivery - text supplied	Support	See paragraph 4.4.12
6	6.1.1	London Assembly	The SPG should encourage reconfiguration of town centres, particularly in secondary retail areas, where appropriate.	See SPG sections 1 and 2	see sections 1 and 2
6	6.1.1	London Forum of Civic and Amenity Societies	Regeneration should be a more prominent theme and a major part of the overall strategy.	Support - regeneration featured more prominently in section 5	see section 5
6	6.1.1	South London Partnership	SPG should clarify on-going process. Needs to be a reference to Duty to Cooperate in final SPG	Duty to Cooperate implicit in plan making process - not needed to ref in SPG	No change
6	6.1.11	English Heritage	It is important to recognise the value of historic centres to regeneration: their adaptability, distinctiveness and attractiveness. This section should recognise the value that physical improvements to the historic environment can have for successful economic regeneration. For example, the role of shopfront enhancement schemes in increasing footfall in declining centres.	Noted. Role of heritage to support regeneration highlighted in para 5.1.6. Role of shop front enhancements identified in section 5.2.	No change
6	6.1.9	LB Bromley	Council would like to suggest Penge is considered an area in need of regeneration.	For consideration in future alteration/review of London Plan	No change
6	6.2.1	Arup	Suggest document tries to be a bit too comprehensive on the process for justifying changes to the town centre network (section 6)	Noted	Section edited
6	6.2.14	London Forum of Civic and Amenity Societies	Include concept of basic level services that a centre needs to provide	Section edited	see section 3.2
6	6.2.4	LB Richmond upon Thames	Advice given is reasonable but unnecessary on subjects such as defining shopping frontages.	Noted	Section edited
6	6.2.6	Barclays Bank	Exhorting LPAs to adopt rigid percentage thresholds, placing a restriction upon beneficial occupation by town centre users has no foundation in law or Government policy. It is the quality of the occupier that is important, rather than the maintenance of some unsubstantiated or arbitrary percentage level of Class A1 occupation which could lead to harming the vitality and viability of centres through the discouragement of investment. Bank pedestrian counts show that banks do drive significant amounts of footfall relative to many A1 shop uses (evidence supplied).	Noted	Section edited
6	6.2-6.3	CPRE London	CPRE London recommends: Landscape connectivity - Spatial planning connecting towns to the wider city region should also include landscape management and connecting up of green infrastructure (London Plan policy 2.17 & All London Green Grid SPG) and working collaboratively with local neighbourhoods and community groups - as key stakeholders in regenerating deprived areas and enhancing local facilities.	Co-ordination with wider city region in terms of infrastructure planning is highlighted in section 6.4 and collaboration with communities is highlighted in section 6.1 so not repeated to avoid duplication.	No change
6	6.4.1	London Assembly	The Committee calls on the Mayor to carry out annual health checks of selected London's town centres to help boroughs and other authorities to develop and adapt town centre programmes and management approaches in a more timely way.	The GLA undertakes a strategic health check approximately every four years to inform strategic policy development and changes to the London Plan. This is considered appropriate for a strategic authority. Para 6.5.4 of the SPG indicates that boroughs may carry out more local health checks making the best use of resources available to them.	No change
6	6.4.1	LB Wandsworth	Recommend GLA work with boroughs to agree scope and purpose for strategic health checks.	Boroughs consulted on the methodology for the 2009 and 2013 health checks. Para 6.5.2 notes that town centre health checks undertaken by GLA with support from the London boroughs.	No change
6	Figure 6.1	LB Waltham Forest	Council would draw attention to emerging regeneration schemes in the centre which together with proposals in Walthamstow town centre AAP suggests 'high' growth potential classification.	For consideration in future alteration/review of London Plan	No change
7	7.1.1	London Assembly	New approaches. The SPG would benefit from a more visionary encouragement for innovative. Interdisciplinary approaches, together with suitable tools for implementation. It should explore the wider potential of these ideas to respond to current trends and future demand more effectively.	Interdisciplinary approaches considered through the SPG and in particular in sections 2 and 6. Final SPG will take into account these comments and those of other respondents.	see section 2 and 6

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
7	7.1.2	LB Wandsworth	Agree that town centres need a strong local vision, strategies and leadership to ensure their long-term success. Wandsworth strategy and visioning work could provide a model for work in other London boroughs. Support for town centre management in SPG.	Case study added	see section 6.1
7	7.1.2	Key Property Investments	Borough specific town centre strategies should be encouraged that have clear cognisance of the varying complementary roles that nearby centres might serve.	Support	see para 6.1.4
7	7.1.4	London Assembly	Detailed advice needed. SPG should include good examples to follow and a greater level of detail on how to better engage stakeholders. SPG should set out ways to enable collaborative processes for involving those who use town centres.	Section on engagement to be edited in response to consultation feedback and allow local flexibility to engage stakeholders depending on local circumstances including development of 'Town Teams'.	see edits to section 6.1
7	7.1.4	LB Islington	Engagement should be extended to local community groups.	covered in 6.1.3	see para 6.1.3
7	7.1.4	Inclusion London	Inclusion London would like to emphasise the importance of consulting with disabled people at the planning and design stage, as it will improve access for disabled people. Involvement of visually impaired people at the planning stage is particularly important when shared surface schemes are being considered.	Support	Reference to early engagement and access groups added to 6.1.3
7	7.1.4	London Access Forum and London Access Association	Important to engage and involve access groups in developing town centre strategies	Support	Reference to early engagement and access groups added to 6.1.3
7	7.1.4	London Assembly	Evidence suggests that partnerships between the community, businesses, property owners and service providers – especially Transport for London (TfL) and public services like the NHS – could be a crucial way to plan and implement a combination of structural changes and environmental improvements	Support	Reference added to service providers in para 6.1.3
7	7.1.4	CPRE London	SPG needs to promote early engagement of local groups, neighbourhood forums, residents associations, amenity societies etc to promote local ownership of plans, stimulate innovation, skills development and trust.	Support	Reference to early engagement added to 6.1.3
7	7.1.4	London Forum of Civic and Amenity Societies	Not clear that 'community organisation' = residents	Noted	see amendment to para 6.1.3
7	7.1.6	English Heritage	We support a proactive approach to town centre management. The SPG should ensure that town centre strategies are informed by an understanding of historic significance and heritage value for robust decision-making, as a means of bringing communities together, and encouraging community ownership of the public realm.	Noted. Town centre strategies should be informed by all considerations raised in the SPG so considered not necessary to repeat all considerations here.	No change
7	7.2.1	LB Redbridge	Welcomes potential for discussion with GLA regarding investment opportunities and delivery vehicles.	Noted	No change
7	7.2.1	LB Wandsworth	Outer London Fund has provided important investments in Tooting and Balham and of course many other London centres.	Noted	No change
7	7.3.4	London Assembly	Knowledge exchange through pan-London working groups should be encouraged and, where possible, initiated and facilitated by the Mayor to help boroughs develop more flexible and adaptable policy solutions for London's town centres.	Future OLF/MRF networking events can ensure that learning and is being captured and good practice shared across town centres in London (see SPG paras 5.1.5-5.1.6). The ATCM (para 6.1.5) also provides an excellent forum for boroughs and other stakeholders to share knowledge and practice in town centre strategy and management.	see paras 5.1.5-5.1.6 and 6.1.5
7	7.4.1	LB Southwark	Support emphasis on value of BIDs and role in place shaping of town centres	Noted	No change
7	7.4.1	LB Wandsworth	Welcome more support from the GLA for BID development process and funding and how BID model can provide additional services and play a more central role in delivering sustainable trading environments, increased employment and more cohesive communities.	BID section updated	see section 5.3
7	7.4.1	Paddington BID	Applaud the Mayor's stated commitment to supporting BIDs. Add corollary that a BID is not necessarily the right option in every case and that development should only be encouraged where there is a clear business case for doing so.	Noted	see section 5.3
7	7.4.3	Paddington BID	Whilst commending E11 for their initiative, we take great pride in being the first BID to launch a commercial recycling scheme.	An appropriate reference to Paddington BID to be added to para 5.3.2	see para 5.3.2
7	7.4.4	Arup	Useful guidance on management initiatives, funding, capacity building initiatives and knowledge transfer e.g. on BIDs (para 7.4.4)	Noted	No change
7	7.5.1	Arup	Useful guidance on site assembly and alternative shop formats as product showcases or internet portals (all in section 7).	Noted	No change
7	7.5.1	CRPE London	Support local initiatives including skills, green enterprise and community ownership.	Noted	No change
7	7.5.1	LB Southwark	Cultural and ethnic diversity of different areas of London can itself be a marketing tool to attract investment and growth - for example Brick Lane has grown in recent years to become a vibrant shopping and cultural hub with a growing night time economy and in Southwark, the E&C has a concentration of Latin Americans who have established local businesses in the area. Other examples are Peckham and Walworth.	Cultural diversity integrated in text	see para 5.4.1
7	7.5.11	LB Tower Hamlets	Support for retention of business rate revenue to enable local regeneration projects. The extent to which this is relevant to planning policy remains unclear.	Noted	No change
7	7.5.12	ATCM and London Assembly	Length of leases and availability of break-clauses are also important considerations	Support	see para 5.4.3
7	7.5.12	London Assembly	Reference in Assembly Report 'Open for Business' to RICS/BRC lease and guidance	Support	see para 5.4.3
7	7.5.5	Just Space	Mention should be made of Local Authority land in providing sites that do not involve CPO and be utilized beneficially outside the open market	Noted - see new section 2.1	see section 2.1

Draft SPG Section	Ref/para	Respondent	Comment	GLA Response	Amendments to Final SPG (with new references where appropriate)
7	7.5.6	English Heritage	The value of the historic environment as the basis for local brands should be recognised. Heritage Lottery Fund Townscape Heritage Initiative, and other grants available for non-physical works, could be drawn on to improve the appearance of historic centres and to use historic as a focus for placemarketing.	Noted	Reference to Heritage Lottery Fund inserted in section 5.4
7	7.5.7	LB Enfield	Would like Mayor to affirm his commitment to extending wi-fi across London including in town centres in Outer London	Development of ICT infrastructure and connectivity highlighted in para 5.4.1	see para 5.4.1
7	7.5.7	London Assembly	Reference in London Assembly Report 'Open for Business' to support for pick-up points on high streets where people can collect items bought online	Support	Reference added in 5.4.1 to pick up points
7	7.5.7	London Forum of Civic and Amenity Societies	Opportunity to propose town centre wi-fi zones	Development of ICT infrastructure and connectivity highlighted in para 5.4.1	see para 5.4.1
7	7.5.9-10	City Corporation of London	The scope of s106 planning obligations is being reduced is mentioned twice on this page. This may change to April 2015 if the Government's proposed CIL Further Reforms are taken forward.	Text to be updated in final SPG	see para 5.4.2
8	8.1.1	Biggin Hill Airport	Welcomes SPG in supporting SOLDC policy of the London Plan	Noted	see Appendix E
8	Figure 8.1	LB Bromley	Bromley Council welcomes designation of Biggin Hill as a SOLDC.	Noted	see Appendix E
8	Figure 8.1	LB Redbridge	Council at early stage of discussing potential for promotion of its centres as SOLDC and subject to these discussion the Council may wish to explore further with the GLA.	Noted	No change
8	Figure 8.1	LB Tower Hamlets	Tower Hamlets does not have a SOLDC despite emergence of Canary Wharf and Whitechapel as areas of strategic importance and accessibility. Query why centres in TH excluded from having same support and focus.	SOLDC based upon those identified in LP2011. Note Canary Wharf promoted as potential Met centre. Whitechapel recognised in FALP (Policy 4.10)	No change
8	Figure 8.1	Arup	Suggest White City could also have a mortarboard symbol if that category were extended in the key to be Higher Education "and Research", to reflect the proposed Imperial campus. Could consider tourism symbol at Royal Docks to reflect Excel.	SPG is based upon the 2011 London Plan. Higher education/research role being considered in Further Alteration	No change
8	Figure 8.2	Arup	Second criteria in Figure 8.2 might be better expressed as 'Location contains one or more specialist attributes of greater than sub-regional importance "based on the scale and mix of activity in particular sectors in accessible locations", including: retail function, office clusters etc. This would allow historic growth, scale and accessibility to be deleted from the list – they sit oddly with the sectoral list, and all areas would surely qualify under historic growth. One or two could also be amalgamated, to reflect Figure 8.2's key	Support	Second criteria in Figure 7.2 amended
Appendix A	Appendix A	LB Barnet	Note that Appendix makes no reference to approved planning application for Brent Cross Cricklewood	Noted	Appendix removed from final SPG
Appendix C	Appendix C	LB Waltham Forest	Inclusion of guidance on accessible hotel provision is supported.	Noted	No change
Appendix D	Appendix D	City Corporation of London	Guidance contained in appendix D is welcomed as it helps to distinguish between planning/ licensing/police etc. and who is responsible for the relevant elements of managing the night time economy	Noted	No change
Appendix H	Appendix H	Just Space	Should be an explicit category for job numbers and growth. Should be evidence on sustainable communities and lifetime neighbourhoods, deficiencies in access to services and views of local residents.	Health checks covered in 6.5 and see London Town Centre Health Check, GLA 2014	see section 6.5
Appendix I	Appendix I	Just Space	SPG should be cautious in providing guidelines for SOLDCs that have not been scrutinised in a wider and local arena and should be further qualified as indicative.	Appendix E indicates that the implementation points are guidelines	see Appendix E
Appendix I	Appendix I	South London Partnership	Wandle Valley SOLDC must also be recognised as containing strategic industrial functions. Opening bullet for Upper Lee Valley recognises both leisure and industrial activity and should be the same for the Wandle Valley	Text to be updated in final SPG	see Appendix E
Appendix I	Appendix I	LB Barnet	Pleased to note Appendix refer to guidelines for Brent Cross.	Noted	No change
Appendix I	Appendix I	LB Bromley	Council welcomes the implementation guidelines and notes that work is underway in considering the planning framework for Biggin Hill SOLDC. It is acknowledged that a partnership stakeholder approach is appropriate to bring forward the economic role of the SOLDC.	Noted	see Appendix E
Appendix I	Appendix I	LB Croydon	Agree with SOLDC implementation guidelines for Croydon	Noted	No change
Appendix I	Appendix I	LB Enfield	Welcome recognition of some key developments in ULV, would be helpful to see clearer link between regenerative elements (text supplied)	Text updated making link between regeneration and infrastructure	see Appendix E
Appendix I	Appendix I	Royal Borough of Kingston upon Thames	Support guidelines. Request one amendment to Ref 8, bullet 4 to refer to work in partnership with the University to help deliver suitable managed student accommodation (text supplied)	Text amended	see Appendix E
Appendix I	Ref 15	Biggin Hill Airport	Implementation guidelines need a sharper focus on specific opportunities and supporting the creation of a positive planning framework and reflect changes in policy including NPPF, Aviation Policy Framework, Airports Commission and Bromley preferred options.	Noted	see Appendix E