

LB Sutton’s Response to Panel’s Question

February 2019



**Matter 88: Town Centres and Retailing**

Is the town centre network set out in the Plan justified and would it be effective in ensuring that identified needs for main town centre use developments are met in appropriate locations in accordance with national policy?

**d) Are the classifications, as set out in Table A1.1 and described in Annex 1, for night-time economy functions justified?**

1.1 The London Borough of Sutton considers that the night-time economy classifications are not justified as the classifications are not based on the most appropriate strategy and fail to “reflect the individuality of town centres” (2012 NPPF, paragraph 23, fourth bullet point).

**Not Based on an Appropriate Strategy**

1.2 Paragraph 14.6.1 of the 2018 London Town Centre Health Check (NLP/EC/013) explains how the night-time classifications have been calculated. Table 1 below sets out the council’s opinions on the criteria that have led to the classifications, particularly with regard to district centres and differentiating between them for their importance in terms of the night-time economy.

*Table 1: LB Sutton Comments on Night-time Economy Classification Criteria*

| Criterion  | Comment   |
|--|---|
| <b>Total occupied leisure floorspace – excluding cafes</b> | • Cafes should not be excluded as they often open in the early evening and sometimes later  |
| <b>Total occupied cinema floorspace</b>                    | • This is appropriate for differentiating between Metropolitan and Major centres but does not differentiate between District Centres of local significance and District Centres of more than local significance |
| <b>Total occupied theatre floorspace</b>                   | • This is appropriate for differentiating between Metropolitan and Major centres but does not differentiate between District Centres of local significance and Local Centres of more than local significance    |
| <b>Total occupied restaurant floorspace</b>                | • A suitable criterion for differentiating between District Centres of local significance and District Centres of more than local significance  |

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|  |   |
|--|---|
| <b>Total occupied pubs and bars floorspace</b>     | <ul style="list-style-type: none"> <li>• A suitable criterion for differentiating between District Centres of local significance and District Centres of more than local significance</li> </ul>  |
| <b>Total nightclub floorspace</b>                  | <ul style="list-style-type: none"> <li>• This is appropriate for differentiating between Metropolitan and Major centres but does not differentiate between District Centres of more than local significance</li> </ul>  |
| <b>Total number of hotel bedrooms</b>              | <ul style="list-style-type: none"> <li>• This is appropriate for differentiating between Metropolitan and Major centres but does not differentiate between District Centres of local significance and District Centres of more than local significance</li> </ul> |
| <b>Total occupied not food takeaway floorspace</b> | <ul style="list-style-type: none"> <li>• This is not an appropriate criterion as Policy E5 (c) tries to restrict hot-food takeaways and so the plan is internally inconsistent.</li> </ul>  |

**1.3** Reviewing the criteria for the night-time classifications, the council concludes that they are not fit-for-purpose for reviewing District Centres as only two of the criteria are applicable to District Centres and so the differentiation between District Centres is not defined enough.

### **Lack of Consideration of Clustering**

**1.4** Furthermore, the criteria for night-time classifications ignores the effect of clustering, particularly for District Centres. Some District Centres lend themselves to the night-time economy more than others and there are already clusters of night-time economy activities which are not recognised through the criteria.

**1.5** Appendix 1 shows the top 40 of District Centres across London by the percentage of A3 and A4 uses divided by the total number of retail units in the centre. This gives a guide to the location of night-time economy clusters. The appendix shows that the Draft London Plan night-time categorisations appear considerably arbitrary when placed against this measure and some smaller centres “punch above their weight” in terms of night-time economy activities.

**1.6** In its representation on the Draft London Plan, the London Borough of Sutton made the assertion that Carshalton Village, with its array of historic pubs which draw customers from Croydon and Mitcham, and Cheam, with its choice of restaurants which draw diners from beyond the Greater London boundary, should both be classified as NT3 (of more than local significance). This assertion is borne out when clustering is considered through the proportion of A3 and A4 units to total retail units. Carshalton is 28<sup>th</sup> (out of 150 District Centres) in terms of the concentration of A3/A4 uses in the centre compared to retail uses and Cheam is 36<sup>th</sup>.

### **Conclusion**

**1.7** The council considers that the night-time classifications are not justified as the existing criteria fails to distinguish between District Centres sufficiently and fails to address the existing clusters of night-time economy activities at all.

**1.8** In order to make the plan sound the council considers the following changes should be made:

**Change Required to Make Table A1.1 Sound**

Those centres which appear in Appendix 1 and which do not already have a night-time economy classification should be classed as NT3.

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### Appendix 1: Top 40 District Centres by Percentage of A3 and A4 Uses to Retail Units

| Centre                              | Borough                      | Category | Total Retail Units | Total A3 and A4 Units | Percentage of A3/A4 Units to Retail Units |
|-------------------------------------|------------------------------|----------|--------------------|-----------------------|---|
| <b>Praed Street/ Paddington</b>     | Westminster                  | NT3      | 36                 | 35                    | <b>97</b>                                 |
| <b>Clapham High Street</b>          | Lambeth                      | NT2      | 97                 | 64                    | <b>66</b>                                 |
| <b>West Hampstead</b>               | Camden                       |          | 64                 | 37                    | <b>58</b>                                 |
| <b>South Kensington</b>             | Kensington and Chelsea       | NT1      | 75                 | 43                    | <b>57</b>                                 |
| <b>Brick Lane</b>                   | Tower Hamlets                | NT2      | 105                | 60                    | <b>57</b>                                 |
| <b>Fulham Road (west)</b>           | Kensington and Chelsea       |          | 45                 | 25                    | <b>56</b>                                 |
| <b>Earls Court Road</b>             | Kensington and Chelsea       |          | 50                 | 26                    | <b>52</b>                                 |
| <b>Greenwich West</b>               | Greenwich                    | NT3      | 90                 | 46                    | <b>51</b>                                 |
| <b>Wembley Park</b>                 | Brent                        | NT3      | 40                 | 20                    | <b>50</b>                                 |
| <b>Lee Green</b>                    | Lewisham/ Greenwich          |          | 34                 | 17                    | <b>50</b>                                 |
| <b>Upper Norwood/Crystal Palace</b> | Croydon/Lambeth/ Bromley     |          | 90                 | 44                    | <b>49</b>                                 |
| <b>Plumstead</b>                    | Greenwich                    |          | 57                 | 27                    | <b>47</b>                                 |
| <b>New Cross</b>                    | Lewisham                     | NT3      | 43                 | 20                    | <b>47</b>                                 |
| <b>New Barnet</b>                   | Barnet                       |          | 34                 | 15                    | <b>44</b>                                 |
| <b>Hornchurch</b>                   | Havering                     | NT3      | 99                 | 43                    | <b>43</b>                                 |
| <b>Dulwich - Lordship Lane</b>      | Southwark                    |          | 73                 | 31                    | <b>42</b>                                 |
| <b>Balham</b>                       | Wandsworth                   |          | 89                 | 37                    | <b>42</b>                                 |
| <b>Beckenham</b>                    | Bromley                      | NT3      | 116                | 48                    | <b>41</b>                                 |
| <b>Camberwell</b>                   | Southwark/Lambeth            |          | 95                 | 39                    | <b>41</b>                                 |
| <b>Earlsfield</b>                   | Wandsworth                   |          | 42                 | 17                    | <b>40</b>                                 |
| <b>Gants Hill</b>                   | Redbridge                    | NT3      | 66                 | 26                    | <b>39</b>                                 |
| <b>Church End, Finchley</b>         | Barnet                       |          | 112                | 43                    | <b>38</b>                                 |
| <b>Swiss Cottage/ Finchley Road</b> | Camden                       | NT2      | 130                | 49                    | <b>38</b>                                 |
| <b>Whetstone</b>                    | Barnet                       |          | 59                 | 22                    | <b>37</b>                                 |
| <b>Acton</b>                        | Ealing                       | NT3      | 117                | 43                    | <b>37</b>                                 |
| <b>Crouch End</b>                   | Haringey                     |          | 124                | 45                    | <b>36</b>                                 |
| <b>Blackheath</b>                   | Lewisham/ Greenwich          | NT3      | 73                 | 26                    | <b>36</b>                                 |
| <b>Carshalton Village</b>           | <b>Sutton</b>                |          | <b>34</b>          | <b>12</b>             | <b>35</b>                                 |
| <b>Purley</b>                       | Croydon                      |          | 71                 | 25                    | <b>35</b>                                 |
| <b>Finsbury Park</b>                | Islington/ Hackney/ Haringey | NT3      | 190                | 66                    | <b>35</b>                                 |
| <b>Twickenham</b>                   | Richmond upon Thames         | NT3      | 154                | 53                    | <b>34</b>                                 |
| <b>Wanstead</b>                     | Redbridge                    |          | 64                 | 22                    | <b>34</b>                                 |
| <b>South Woodford</b>               | Redbridge                    | NT3      | 105                | 36                    | <b>34</b>                                 |
| <b>New Malden</b>                   | Kingston upon Thames         |          | 82                 | 28                    | <b>34</b>                                 |
| <b>Lavender Hill/ Queenstown Rd</b> | Lambeth/Wandsworth           |          | 41                 | 14                    | <b>34</b>                                 |
| <b>Cheam Village</b>                | <b>Sutton</b>                |          | <b>62</b>          | <b>21</b>             | <b>34</b>                                 |
| <b>Surbiton</b>                     | Kingston upon Thames         |          | 95                 | 32                    | <b>34</b>                                 |
| <b>Kentish Town</b>                 | Camden                       | NT3      | 78                 | 26                    | <b>33</b>                                 |
| <b>Brentford</b>                    | Hounslow                     |          | 30                 | 10                    | <b>33</b>                                 |
| <b>Archway</b>                      | Islington                    | NT3      | 69                 | 23                    | <b>33</b>                                 |