

Retailing

M89. Would policies SD6, SD7, SD8, SD9 and E9B provide an effective strategic framework for the preparation of local plans and neighbourhood plans relating to town centres and all types of main town centre use development (including bulky goods retailing), that is consistent with national policy?

As a strategic framework the policies are weak in:

1. understanding the relationships, interdependencies, supply chains, social value, environmental value etc of all town centre and market uses, not just retail;
2. ensuring sufficient protection of varied workspace in and around town centres and high streets including industrial, workshops, yards etc. Policy needs to recognise the shrinking capacity of work space in town centres and high streets (beyond the retail frontage). The purpose of the policy should be to protect and sustain capacity – similar to the industrial land policies. Boroughs should ensure that they include all uses (beyond what is prescribed in NPPF). ‘Surplus’ work space should not be automatically released for residential development – it is the low cost capacity that allows for growth, adaptation, innovation.’
3. Exaggerating the risk of oversupply of comparison good space in district centres. Text §2.6.3 says “As many as 60 per cent of District centres...” but the Experian report cited as the source could equally be summarised “...as few as 25%...” and thus in the same range as the larger centres.

SD6

New policy sub-section

HA The varied role of London’s high streets should be supported and enhanced. is welcome. It should be re-worded to say

HA The varied role of London’s high streets both inside and outside defined Town Centres should be supported and enhanced.

New GLA text “§2.6.1B High streets are one of London’s most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. The character and function of high streets within and outside town centres should be promoted and enhanced.” is welcome but only with the inserted blue underlined words.

New GLA text “§2.6.4A Residential development plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing, although not if it reduces jobs in the centre. Residential-only schemes in town centres may be appropriate outside the primary shopping area and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.” Is welcome but only with the addition of the blue underlined phrase, or equivalent. Town centre workers use the streets and facilities at various times of day, while it would take a large number of residents to contribute as much vitality.

SD7 (previously 8)

New policy B 1A on high streets and parades outside Town Centres is welcome, though is grudging rather than inspiring. It is of strategic importance for London that Boroughs, Neighbourhood Forums and community groups be supported in defending and improving services and workplaces which are close to where people live, especially where these have good local public transport which most high streets do. The rapid development of innovative practices on this topic would help reduce the need to travel by vehicle at all and shorten trips which do have to be made, while fostering active travel.

Insert new sub-policy B7 [Boroughs should...]

conduct a complete audit of all non-residential accommodation; internal and external floorspace; and jobs in the borough prior to preparation of local plans, and prior to defining town centre boundaries.

SD8 (previously 7) promotion/demotion in the hierarchy

As we said in Matter 88, we do not consider that the criteria are evident, nor that there are adequate procedures for consultations with communities and businesses. We also stress the extremely volatile situation in retailing and logistics. We would be happy to see this policy dropped.

SD9 Town centres: Local partnerships and implementation

Policy SD9 A which calls for each town centre to have a Strategy produced in partnership, inclusive and representative, at the local level is supported, but to reflect its potential, this should be in the over-arching/ framing Town Policy SD6 and this approach should be embedded in all spatial policies for plan-making, including in SD1 for Opportunity Areas, and H2 Small Sites for incremental intensification. We recommend inclusion of a strong overall statement in GG1 and a commitment to develop a Mayoral SCI establishing

both the Mayor's own practice and giving guidelines for good practice across all actors.

Policy SD 9 C 1) Article 4 Directions to protect the economic and social activities of town centres from permitted development rights for housing redevelopment are welcomed.

We see no need for special protections for bulky good retailing. We agree that single-storey retail parks and supermarkets, and especially their open car parks, are suitable for redevelopment with housing above trading and business space.

E9B (in the economy chapter)

Is acceptable but, like the SD policies above, much too narrowly focused on retailing alone, rather than on the whole range of private and public local services which people need. Post Office, car repair, tool hire, ATM, dentist, library and the repairing of everything which the circular economy will bring.

A policy point should be added to ensure the protection of existing retail and markets in line with our comments on other E policies (e.g. offices and industrial land) – particularly in terms of low cost, adaptable, accessible units on and around high streets. There should be a reference to the evidence and recommendations in the ***High Streets for All*** report commissioned by the GLA which indicates that around 70% of high streets are under threat because they don't have planning designations. The focus solely on town centres in the policy undermines the contribution and needs of high streets and surrounding spaces.

The policy should include mention of migrant and ethnic retail, particularly where it refers to 'specialist' shopping, markets etc., in line with suggestions we made for Policy E8.

Neighbourhood Planning

Boroughs should work closely with residential and business communities in the analysis and understanding of local clusters of retail and other businesses where change is envisaged and/or where Neighbourhood Planning is going on. In particular Boroughs should be sympathetic to

1. Efforts to reduce the need to travel by protecting and/or expansion of local services and jobs
2. Proposals for the designation of social infrastructure and business premises as Assets of Community Value
3. Securing non-residential ground floor uses where residential developments are envisaged.