

## DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

### Statement on Matter M89

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### ***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?**

**M89: Yes** – these policies all reinforce the “town centre first” approach in national policy (paras 23-27 of NPPF (2012)).

“Bulky goods retailing” is not mentioned in the NPPF or in the current or new draft London Plan, nor are “retail warehouses”.

“Retail parks”, especially low-density, out-of-centre retail parks, are seen as candidates for change of use to employment (para 2.8.3), to housing (H1 B2 b and SD7 A 4)); mixed-uses (SD7 B 5a) and other uses in line with Policies SD6, SD7, SD8. The redevelopment of such sites should be a function of their location and accessibility, with the density of development being a function not only of the relative public transport accessibility level of the site but the access to social infrastructure that will be required.

**PROPOSAL: Add a section SD7 A 5) as follows:-**

**“Out of centre retail parks would not be suitable for housing development if new homes there are not within 800m of social infrastructure facilities.”**

There is some concern by some “bulky goods” retailers (but not from supermarkets) that landowners are being encouraged to redevelop “low-density, out-of-centre retail parks”. Many of these sites pre-date the sequential test and would not meet current planning policy requirements in relation to town centres and accessibility/car dependence.

London Forum considers that there is no planning case for out-of-centre retail parks (or leisure parks) having protection against change of use.