

Draft London Plan EiP 2019

London Borough of Bromley Written Statement

Matter M90

Retailing - Development Management

Is the approach to development management set out in policies SD6, SD7, SD8, SD9 and E9BA justified and consistent with national policy and would it be effective in terms of:

- a) ensuring that identified needs for all forms of main town centre uses, including bulky goods, are accommodated in appropriate locations in accordance with national policy;*
- b) requiring large scale commercial development (over 2,500sqm of A Use Class floorspace) to support the provision of small shops and other commercial units (including “affordable units” where there is evidence of local need); and*
- c) supporting Policy GG4 “delivering the homes Londoners need”?*

Comment

Bromley expresses concerns as to whether the proposed approach to development management is justified and consistent with national policy and would be effective in terms of ensuring that identified needs for main town centre uses are accommodated in appropriate locations.

The Council had previously objected to Clause C of Policy SD6 and expressed concerns over its overemphasis on ‘higher density’ schemes in town centres, as well as the admittance of residential-only schemes within town centre boundaries. The removal of references to ‘higher density’ and ‘high density’ development in the modifications is welcomed. However, it has reservations about the retention of the paragraph relating to residential-only schemes in the supporting text. When combined with the new policy emphasis on high streets, and with the requirement for proposals for certain new main town centre uses on edge of centre sites (within 300m of primary shopping areas for retail uses) to include impact assessments, there is a risk that in-centre commercial sites located away from primary and secondary frontages could be devalued in favour of an entirely or predominantly residential product.

Bromley also objected to the encouragement of residential development into out-of-centre retail and leisure parks under Policy SD7 Town centres: development principles and Development Plan Documents (then Policy SD8). Many out of centre retail parks in Outer London are poorly serviced by public transport and their promotion in Local Plans for residential-led intensification could lead to increased car dependency and parking pressures. There is also the potential for this policy to encourage further out of centre retail applications through the addition of longer-term

residential hope value. This issue has not been addressed in the latest modifications and therefore Bromley's objection stands.

Whilst the Draft London Plan has been prepared in the context of the previous National Planning Policy Framework, recent changes to both the Draft London Plan and to the NPPF have created a contradictory strategic framework which will likely lead to confusion amongst applicants and determining authorities. Modifications to Policies SD6 and SD8 have added further references to diversification of town centres, in the case of the latter, where town centres are in decline. This added emphasis is at odds with the NPPF which has now omitted a previous reference to town centres in decline. Further, whereas Policy SD7 continues to require impact assessments for edge or out of centre office locations office uses, the NPPF now no longer requires this.