

M88. 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?

88.1 Yes. The town centre network plays a crucial role in supporting London's growth and sets out how London's town centres should be managed to accommodate main town centre uses of appropriate scale and in suitable locations.

88.2 The 2012 National Planning Policy Framework (NPPF) requires plans to set out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth and sets criteria for local and inward investment, promoting competitive town centre environments through a defined network and hierarchy of centres, and to set out policies for the management and growth of those centres.¹

88.3 The town centre network has been a feature of the London Plan since 2004. Performance and classification of town centres has been regularly reviewed through strategic London town centre health checks, the latest of which was undertaken in 2017.² This long-term strategic approach to the management of London's town centres supports sustainable economic growth across London and complements centres in the Wider South East.

88.4 The town centre network promotes a broad distribution of centres of different roles and sizes across London to ensure adequate provision of retail, leisure and other uses to meet the needs of Londoners and those who work and visit the capital. This approach helps to direct investment to all town centres across London and supports the complementary growth of individual centres in the wider network.

a) Is the existing town centre network classification of (i) international, (ii) metropolitan, (iii) major and (iv) district centres illustrated on Figure 2.17 and set out in Table A1.1 justified?

88.5 Town centres are classified in Table A1.1 and illustrated in Figure 2.17, setting out a hierarchy according to their role and function that recognises the different size and draw of town centres.

88.6 The roles in the network are:

International Centres - globally-renowned retail and leisure destinations, providing a broad range of high-order comparison and specialist shopping.

Metropolitan Centres – contain at least 100,000 sqm of retail, leisure and service floorspace and serve wide areas (or 'catchments') which can extend over several boroughs and into parts of the Wider South East.

¹ NLP/GD/03: DCLG, National Planning Policy Framework (NPPF), March 2012, paragraph 21 and 23

² NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018

Major Centres – generally contain over 50,000 sqm of retail, leisure and service floorspace and have a borough-wide catchment.

District Centres – typically contain 5,000-50,000 sqm of retail, leisure and service floorspace and distributed more widely than Metropolitan and Major centres, providing convenience goods and services for more local communities.

- 88.7 The Policy seeks to bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major centres through development plans and development proposals. District Centres should play a particular role in providing convenience retailing, leisure and social infrastructure to support smaller catchments.
- 88.8 The Town Centre Health Check used a range of qualitative and quantitative indicators to determine the role each centre fulfils in the town centre hierarchy. The indicators focus on strategic matters, using robust and consistent pan-London data collected by the GLA, in collaboration with, and with opportunities for input and review by, the boroughs. A detailed analysis report has been published alongside the full datasets that underpin the analysis.³
- 88.9 Minor Suggested Changes have been made following discussion with boroughs and in response to consultation on the draft London Plan.⁴

b) Given the definitions of the classifications of town centres set out in Annex 1 and Figure 2.18, is the identification of centres other than “international” and “metropolitan” in the Plan justified and consistent with national policy relating to town centres and compliant with legislation relating to the purpose of a spatial development strategy?

- 88.10 The 2012 NPPF requires boroughs to promote competitive town centres, recognise their role at the heart of communities, provide a framework to manage and enable their growth and define a network and hierarchy of centres that is resilient to anticipated future economic changes.⁵
- 88.11 The draft London Plan provides strategic guidance relating to the scale and range of retail, leisure and service provision appropriate to each type of centre in the town centre network. Policy SD8 C is clear that changes to District, Local and Neighbourhood Centres, and CAZ retail clusters can be brought forward through local plans. Changes to the classification of International, Metropolitan and Major town centres can only be brought forward through the London Plan. The inclusion of District Centres and CAZ retail clusters in the town centre network allows for a more comprehensive approach to the development of strategic evidence, gives

³ NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018; NLP/EC/013a: Mayor of London, London Town Centre Health Check Report Appendix 3, January 2018; NLP/EC/013b: Mayor of London, London Town Centre Health Check Report Appendix 4, January 2018

⁴ NLP/CD/09: GLA, Table of Changes – Minor Suggested Changes to the Draft new London Plan, August 2018, REF MSC.A1.11, MSC.A1.13, MSC.A1.18, MSC.A1.19 and MSC.A1.21

⁵ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

clarity and guidance in drawing up local plans and neighbourhood plans, and supports consistency in the application of strategic policies.

- 88.12 This approach aligns with the principal purposes of the GLA, in particular that to promote economic development.⁶
- 88.13 Policy SD8 D recognises the strategic importance of International, Metropolitan and Major town centres and their capacity for retail, employment, leisure and residential development. Figure 2.18 sets out the typical floorspace, range of uses and accessibility levels of the different classifications and indicates that Major Centres typically give access to retail, offices, civic functions, culture, leisure and entertainment and services. Catchment areas for Major Centres typically extend into other boroughs, usually enabled by a high public transport accessibility rating.
- 88.14 District Centres make up a large majority of London’s town centres. It is strategically important to support these centres as they enable residents in all parts of London to sustainably access a broader range of shops and services beyond those available in Local and Neighbourhood Centres. This is particularly important for outer London, where Major and Metropolitan Centres are more geographically dispersed. Some District Centres lie within more than one borough, serve catchments across borough boundaries or have specialist functions that serve specific communities.
- 88.15 Central Activities Zone (CAZ) retail clusters often accommodate retail that is broadly comparable to Major or District Centres. They are an important contributor to the town centre network and support the wider economic role of the CAZ and its strategic functions.
- 88.16 Boroughs are encouraged to promote Local and Neighbourhood Centres to ensure residents have access to retailing and services to meet their day-to-day needs. These centres typically serve a localised catchment and are often most accessible by walking or cycling.
- 88.17 This comprehensive approach will ensure that the network performs effectively, providing a range of services to London’s communities at various scales, appropriate to their catchment area. The Policy provides a consistent, strategic framework that enables local authorities to plan proactively and flexibly to support the viability and vitality of town centres.
- 88.18 A Further Suggested Change is proposed to Table A1.1 – Town Centre Network. Following discussions with the borough, Lower Marsh/The Cut Retail Cluster has been renamed Waterloo Retail Cluster (see Appendix 1).
- c) Are the future potential changes to the town centre network illustrated on Figure A1.1 and set out in Table A1.1 justified?**

⁶ NLP/GD/02: OPSI, Greater London Authority Act 1999 (as amended) (website), 1999, Part II s.30(2)(a)

- 88.19 Yes. A robust evidence base supports the classification of future potential changes to town centres, set out in the Town Centre Health Check Analysis Report.⁷
- 88.20 The future potential town centre classifications have been informed by the same indicators as the existing town centre network and an analysis of the pipeline of development derived from data in the London Development Database. This provides an understanding of how town centres would perform should the pipeline be built out.⁸ Classifications have also been informed by discussions with boroughs to ensure that future potential town centre classifications support the strategic aims of Opportunity Area Planning Frameworks and local plans. Table 4 of the Town Centre Health Check Analysis Report 2017 sets out the recommended future potential classifications of centres that are listed in the current London Plan. Table 5 of the report recommends additional future potential classifications of other centres.
- 88.21 These centres are identified for future reclassification subject to strategic and local plan policies and are conditional on evidence, such as capacity analysis, impact assessments, land use, public transport, walking and cycling provision, planning approvals and implementation.
- 88.22 All changes should be supported by robust evidence to ensure efficacy of the town centre network in co-ordinating the distribution of town centre uses across London at an appropriate scale. Regular town centre health checks and town centre boundary reviews will help ensure that centres are classified appropriately in accordance with their performance, role and function. The classification of centres as future potential centres does not preclude the identification by boroughs of indicative town centre boundaries and appropriate policies and site allocations in local plans to support the planned development of a future potential centre, subject to appropriate evidence and conformity with London Plan policies.
- 88.23 In response to further discussions with boroughs and representations received through consultation, Minor Suggested Changes have been made to the classification of a number of future potential centres.⁹

d) Are the classifications, as set out in Table A1.1 and described in Annex 1, for (i) night-time economy functions, (ii) commercial growth potential, and (iii) residential growth potential justified?

(i) Night-time economy functions

- 88.24 London's town centres and CAZ accommodate the majority of the city's night-time economic activities. A weighted analysis of the amount of floorspace of uses that

⁷ NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018

⁸ NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018

⁹ NLP/CD/09: GLA, Table of Changes – Minor Suggested Changes to the Draft new London Plan, August 2018, REF MSC.A1.8, MSC.A1.9 and MSC.A1.29

contribute to the evening and night-time economy and cultural activities has informed the night-time economy classifications.¹⁰

- 88.25 The offer of night-time activities varies across the city, under the following categorisations:
- NT1 – Areas of international or national significance
 - NT2 – Areas of regional or sub-regional significance
 - NT3 – Areas with more than local significance
- 88.26 The night-time economy includes all activity taking place between the hours of 6pm and 6am as set out in paragraph 7.6.1. Such activities include eating, drinking, entertainment, shopping and spectator sports. Uses that employ a large number of night-time workers such as hospitality, cleaning, wholesale and distribution, transport and medical services are also considered part of the night-time economy.
- 88.27 The draft Plan promotes management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services.
- 88.28 The importance of the night-time economy to London’s overall economy is outlined in the draft Plan, reflecting the Mayor’s aim to promote London as a 24-hour global city. It is important to plan for London’s night-time economy in a strategic, co-ordinated way, taking advantage of the city’s competitive edge and attractiveness.
- 88.29 Following the draft London Plan consultation and discussions with boroughs, Minor Suggested Changes have been made to the night-time economy classifications.¹¹ One Further Suggested Change is proposed, which applies a night-time economy classification to Crouch End District Centre (NT3).¹²

(ii) Commercial growth potential

- 88.30 The commercial growth potential of centres has been considered as part of the Town Centre Health Check and takes into account a number of indicators including:
- the pipeline for all commercial floorspace;
 - net comparison goods retail floorspace need 2015-2041;
 - indicative employment capacity;
 - London Office Policy Review guidelines; and
 - significant town centre transport infrastructure upgrades.¹³
- 88.31 Strategic guidance is set out in Table A1.1 and categorises further commercial growth potential into three broad growth scenarios:

¹⁰ NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018

¹¹ NLP/CD/09: GLA, Table of Changes – Minor Suggested Changes to the Draft new London Plan, August 2018, REF MSC.A1.5, MSC.A1.7, MSC.A1.10, MSC.A1.12, MSC.A1.15, MSC.A1.22, MSC.A1.25, and MSC.A1.26

¹² See Mayor of London EiP Statement for Matter 49

¹³ NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018

- High growth – likely to experience strategically significant levels of growth with strong demand for large-scale retail, leisure or office development;
- Medium growth – likely to experience moderate levels of demand for retail, leisure or office floorspace with transport and infrastructure to accommodate it; and
- Low growth – centres that are encouraged to consolidate, making the best use of infrastructure and transport.

88.32 Classifications are reviewed at the strategic level to ensure consistency across London and are consulted upon with the relevant boroughs. In response to consultation on the draft London Plan, Minor Suggested Changes have been made to four centres to reflect higher commercial growth potential.¹⁴

(iii) Residential growth potential

88.33 Policy SD6 makes clear that potential for new housing in town and edge-of-centre locations should be brought forward where appropriate to enhance the commercial role of centres, increase footfall and support convenience retail, leisure uses and the evening and night-time economy.

88.34 In accordance with the 2012 NPPF, residential development should be encouraged in town centres to support their vitality.¹⁵ Policy SD7 B 4 encourages boroughs to plan proactively and identify opportunities for residential growth in town centres considering town centre capacity and strategies.

88.35 Table A1.1 sets out an indicative level of residential development appropriate for London's town centres. This is a broad strategic-level categorisation informed by the SHLAA and the Town Centre Health Check,¹⁶ considering a range of indicators including:

- pipeline residential units for use class C3;
- future maximum Public Transport Access Levels (PTAL) at 2031;
- per cent of the town centre (by area) within a Conservation Area;
- listed and Locally Listed buildings as a per cent of total buildings; and
- SHLAA phases 1 to 5 total housing units in town centre, and in 400m buffer.

Historic England has been consulted on the proposed residential growth potential indicators, and their expert advice has informed these classifications.

¹⁴ NLP/CD/09: GLA, Table of Changes – Minor Suggested Changes to the Draft new London Plan, August 2018, REF MSC.A1.6, MSC.A1.23, MSC.A1.27 and MSC.A1.28

¹⁵ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

¹⁶ NLP/HOU/002: Mayor of London, Strategic Housing Land Availability Assessment, November 2017

88.36 The residential growth potential for three centres has been revised downwards from medium to incremental through Minor Suggested Changes to the draft Plan following, consultation with the boroughs.¹⁷

¹⁷ NLP/CD/09: GLA, Table of Changes – Minor Suggested Changes to the Draft new London Plan, August 2018, REF MSC.A1.16, MSC.A1.17 and MSC.A1.24

Appendix 1: M88 Further Suggested Changes

The Mayor is suggesting the following further changes to Table A1.1 Town Centre Network:

- **Blue** – new text
- ~~Blue~~ – deleted original plan text

Change ref no	Policy/para/table/map	Further suggested change
M88.1	Table A1.1	<i>See table below</i>

Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
212	Lower Marsh/ The Cut Waterloo	Lambeth	CAZ Retail Cluster		NT2	Medium	Incremental	CAZ	