

- 89 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?**
- 89.1 Policies SD6, SD7, SD8, SD9 and E9B provide an effective strategic framework for the preparation of local plans and neighbourhood plans. Policy SD6 sets out clear, overarching principles for how London's town centres and high streets should be promoted and enhanced and gives strategic direction for the range of uses that should be accommodated in town centres, with Policy SD7 setting out specific requirements for local plan and neighbourhood plan policies. Policy SD8 (and Annex 1 of the draft Plan) identifies London's town centre network and sets out how the network should be successfully managed.
- 89.2 Policy SD9 addresses the need for partnership working, town centre strategies and other implementation tools to support town centres. Policy E9B sets out requirements for how development plans should support and manage provision of retail and markets, complementing the town centre Policies in Chapter 2.
- 89.3 The 2012 National Planning Policy Framework (NPPF) requires plans to recognise town centres as the heart of their communities.¹ Policy SD6 identifies the important role town centres play in the lives of Londoners. It seeks to strengthen the role of town centres by ensuring that they provide a competitive range of services and activities and remain the primary locations for commercial activity beyond the Central Activities Zone (CAZ). Policy SD6 supports the provision of social infrastructure in town centres and promotes inclusive town centre environments that meet the needs of all Londoners, recognising the crucial role of London's high streets in supporting local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange.² Policy SD9 specifies the need for local communities to be involved in and shape partnership approaches in managing town centres. Policy E9B requires development plans to provide a policy framework to enhance local and neighbourhood shopping facilities, and to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping, thereby ensuring town centres continue to support strong and inclusive communities.
- 89.4 The 2012 NPPF requires local planning authorities to pursue policies that support the viability and vitality of town centres.³ Policies SD6, SD7 and E9 provide an effective strategic framework to enable boroughs to strengthen, enhance and support their town centres in the preparation of local and neighbourhood plans. In particular, Policy SD6 supports the diversification of town centres, and the draft Plan recognises the need for boroughs to proactively manage town centres, taking into account retail trends and their impacts on centres of different types and sizes,

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

² NLP/CD/09: GLA, Table of Changes – Minor Suggested Changes to the Draft new London Plan, August 2018, REF MSC 2.89

³ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

and to encourage a broad mix of uses in town centres to meet demand. This approach is complemented by support for a diverse range of housing in town centres (SD6 D), vibrant evening and night-time activities (SD6 F), tourism (SD6 G), and social infrastructure (SD6 I). Policy E9 requires boroughs to identify future requirements for new retail development and to consolidate retail space where there is a surplus to requirements, thereby helping to support the vitality and viability of centres and manage their role across the network.

- 89.5 The 2012 NPPF requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes⁴. Policy SD8 sets out a clear network and hierarchy through the London town centre network, which supports a broad distribution of centres of different roles and sizes across the capital, as set out in Annex 1 of the draft Plan. The network allows the role and function of centres to change over time to reflect future economic changes, through changes in the classification of centres through the London Plan or, where appropriate, local plans. The town centre classifications are supplemented by broad policy guidelines for individual town centres set out in Annex 1, which include indicative commercial and residential growth potential, centres identified as Areas for Regeneration, night-time economy functions and office locations. Boroughs should identify District, Local and Neighbourhood Centres and CAZ Retail Clusters through local plans, as required in Policy SD8 C. In addition, Policy E9B A5 requires boroughs to provide a policy framework to enhance local and neighbourhood shopping facilities. Annex 1, Table A1.1 identifies centres that may be appropriate for future classification, subject to matters such as strategic and local plan policies, capacity analysis and impact assessments.
- 89.6 The 2012 NPPF requires local planning authorities to define the extent of town centres and primary shopping areas and set policies identifying which uses will be permitted in primary and secondary frontages.⁵ Reflecting this, Policy SD7 B states that boroughs should define detailed boundaries of town centres, including the overall extent of town centres, together with specific policy-related designations, such as primary shopping areas and primary and secondary frontages, in response to demand and capacity assessments for town centre uses and housing. Policy SD7 B3 requires boroughs to develop policies for edge-of-centre areas, revising the extent of shopping frontages and allowing more flexibility in these areas, taking into account local circumstances.
- 89.7 The 2012 NPPF requires local planning authorities to promote competitive town centres.⁶ Policy SD6 A1 sets an overarching framework to achieve this, encouraging strong, resilient town centres with a diverse range of uses, including main town centre uses, night-time economy uses, and civic, community, social and residential uses, in order to meet the needs of Londoners. Policy SD6 A5 recognises town centres as the primary location for commercial activity beyond the CAZ, and the

⁴ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

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

⁶ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

important contribution these centres make to London's economy, complementing Policy GG5, which seeks to conserve and enhance London's economic competitiveness, encourage diversification and promote its role as a 24-hour city.⁷

- 89.8 The draft Plan aims to support competitive town centres by focusing higher order comparison goods retailing in London's International, Metropolitan and Major Centres (as set out in Policy SD8 D), and promoting the consolidation of a viable range of functions in District Centres, including convenience retailing, leisure and social infrastructure, as set out in Policy SD8 E. Boroughs are required to bring forward capacity for comparison goods retailing in the larger centres as set out in Policy E9 BA3. Policy E9 BA4 requires that boroughs support convenience retailing in all town centres and, in particular, in District, Local and Neighbourhood Centres. The draft Plan also seeks to promote competitive town centres through supporting the adaptation and diversification of town centres in response to changes in consumer behaviour and technological advances, as set out in Policy SD6 B.
- 89.9 The 2012 NPPF requires local planning authorities to retain and enhance existing markets.⁸ Paragraph 6.9.4 recognises the valuable economic, social and cultural role markets play, with their diverse and often specialist range of goods, and their scope to provide employment opportunities. Policy E9 BA8 states that development plans should support London's markets in their full variety, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres. To provide further support to London's markets, the Mayor has established the London Markets Board and undertaken research into London's markets.⁹
- 89.10 The 2012 NPPF requires local planning authorities to allocate a range of suitable sites to meet the scale and type of main town centre uses¹⁰. Site allocation is a matter for boroughs, and to complement this requirement, Policy SD7 B4 asks boroughs to identify centres that have scope to accommodate commercial and residential development by undertaking a range of capacity and demand assessments. Policy SD7 B5 requires boroughs to identify sites suitable for higher density mixed-use residential intensification. Boroughs should take a proactive and partnership-based approach to bring sites forward for redevelopment, as set out in Policy SD9 C2.
- 89.11 The 2012 NPPF requires local planning authorities to allocate appropriate edge-of-centre sites for main town centre uses.¹¹ While specific allocations are a matter for boroughs, Policy SD7 B3 requires boroughs to develop policies for edge-of-centre areas, revising shopping frontages where there is a surplus to forecasted demand and introducing more flexible approaches, taking into account local circumstances.

⁷ see Mayor of London EIP Statement for Matter 49

⁸ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

⁹ NLP/EC/019: Mayor of London, Understanding London's Markets, November 2017

¹⁰ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

¹¹ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

- 89.12 The 2012 NPPF requires local planning authorities to set policies for the consideration of proposals for main town centre uses that cannot be accommodated in or adjacent to town centres.¹² The draft Plan seeks to make the best use of land and encourages sustainable patterns of development, as set out in paragraph 1.2.4, in accordance with the 2012 NPPF, focusing retail development within town centres. Policy SD7 A sets out an approach for the consideration of proposals for main town centre uses, applying the sequential test and impact assessment requirements of the 2012 NPPF.¹³
- 89.13 The 2012 NPPF requires local planning authorities to recognise the role residential development can play in the vitality of town centres.¹⁴ The draft Plan supports the provision of residential development within and on the edge of town centres. Policy SD6 C recognises that residential development can enhance town centres' commercial role, particularly in supporting convenience retail, leisure uses and the evening and night-time economy. Policies H1 and H2 of the draft Plan encourage residential development within 800 metres of a town centre boundary, whilst Policies H13, H15, H17-18 support, in particular, specific types of residential development in locations that are well-connected to local services. Policy SD7 B5d is clear that development plans should identify sites where delivery of residential above existing commercial, social infrastructure and transport infrastructure uses would be appropriate, or where a redevelopment re-providing these uses as part of a mixed-use scheme would be appropriate.
- 89.14 The 2012 NPPF requires local planning authorities to plan positively for town centres that are in decline, and to encourage their economic activity.¹⁵ Policy SD9 AA encourages the development of town centre strategies, particularly for centres that have projected declining demand, and requires boroughs to produce these strategies in partnership at the local level in a way that is inclusive and representative of the local community. Policy SD9 B2 requires boroughs to take a proactive approach to bringing sites forward for redevelopment and supporting land assembly, including through the compulsory purchase process. Policy SD8 B supports the diversification of uses in centres with current or projected declining demand for retail floorspace and enables their reclassification at a lower level in the town centre hierarchy, responding to shifts in demand. This is complemented by Policy SD10 C, which requires the development of locally-sensitive policies and initiatives that contribute to the renewal of town centres in Strategic and Local Areas for Regeneration.
- 89.15 The 2012 NPPF states that local planning authorities should prepare and maintain a robust evidence base to assess the role and function of town centres and the relationship between, and performance of, town centres.¹⁶ The draft London Plan is

¹² NLP/GD/03: DCLG, NPPF 2012, paragraph 23

¹³ NLP/GD/03: DCLG, NPPF 2012, paragraphs 24, 26 and 27

¹⁴ NLP/GD/03: DCLG, NPPF 2012, paragraph 23

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

¹⁶ NLP/GD/03: DCLG, NPPF 2012, paragraph 161

informed by the Consumer Expenditure and Comparison Goods Floorspace Needs study¹⁷, which identified the need for additional comparison goods retailing of around 1.6 million sqm to 2041, as well as the London Town Centre Health Check Analysis¹⁸ and London Office Policy Review¹⁹. Building on this evidence, Policy SD9 B requires boroughs to undertake regular town centre health checks to establish the overall health of town centres, with Policy E9 B1 requiring boroughs to identify future requirements and locations for new retail development, taking into account draft Plan town centre policies and strategic and local evidence of demand and supply.

¹⁷ NLP/EC/007: Experian, Consumer Expenditure and Comparison Goods Floorspace Need in London, October 2017

¹⁸ NLP/EC/013: Mayor of London, London Town Centre Health Check Analysis, January 2018

¹⁹ NLP/EC/004: Ramidus Consulting et al, London Office Policy Review, June 2017