



# TOWN CENTRES SUPPLEMENTARY PLANNING GUIDANCE

JULY 2014

LONDON PLAN 2011  
IMPLEMENTATION FRAMEWORK

**MAYOR OF LONDON**

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# **TOWN CENTRES SUPPLEMENTARY PLANNING GUIDANCE**

July 2014

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# FOREWORD



Town centres are of fundamental importance to the capital and the lives of Londoners. They are the focus for a wide range of uses including shopping and leisure, arts and culture, housing and employment, civic and social infrastructure. They also serve as community hubs, providing a sense of place and identity. Each brings something distinctive to our city – something to be celebrated.

With expected growth in London's population, rapid changes in technology and the rise of internet shopping, town centres are faced with enormous challenges and opportunities. To remain successful they must adapt to these changes by diversifying to a range of uses beyond their traditional retail roles. As the most accessible locations on the public transport network as well as being accessible by walking and cycling, they are particularly suitable for intensification, helping to accommodate growth in housing and employment. Coupled with attention to design, public realm and the environment, town centres should strive to become high quality, inclusive and liveable places.

In the London Plan I set out a strong vision and strategy for London's town centres and this Supplementary Planning Guidance provides further advice on the implementation of its policies drawing on the work of the Outer London Commission. To support implementation of this overarching strategy I am investing in regeneration across London, to improve town centres and associated high streets, protect existing jobs as well as delivering new growth and new jobs. This will add value to a range of investments and local initiatives to help renew and revitalise our town centres.

I look forward to working together towards strong, successful and vibrant town centres. Places where people will want to live, work, visit and do business.

A handwritten signature in black ink, which appears to be 'Boris Johnson'.

Boris Johnson  
Mayor of London

# INTRODUCTION

## PURPOSE OF THE SPG

- 0.1 This Supplementary Planning Guidance (SPG) provides guidance on the implementation of London Plan<sup>1</sup> Policy 2.15 Town centres (see below) and its associated Annex and of other policies in the Plan with specific reference to town centre development and management, such as:
- Policies 4.7-4.8 relating to retail development
  - Policy 4.9 on small shops
  - Policies 4.5-4.6 on arts, culture, entertainment and visitor infrastructure
  - Policy 4.2 on office development
  - Policies in Chapter 3 on housing and social infrastructure
  - Policies in Chapter 5 on response to climate change
  - Policies in Chapter 6 on transport, and
  - Policies in Chapter 7 on places, spaces and inclusive design.
- 0.2 The SPG also provides guidance on Policy 2.16 Strategic Outer London Development Centres and their potential to be developed as business locations with distinct strengths of greater than sub regional importance.
- 0.3 The SPG has been informed by public consultation and recent work by the Mayor's Outer London Commission<sup>2</sup>. It has been drawn up in the context of the National Planning Policy Framework (NPPF), the Localism Act, the Mary Portas Review and an extensive range of research<sup>3</sup>.

## LONDON PLAN POLICY 2.15 TOWN CENTRES

### STRATEGIC

- A The Mayor will, and boroughs and other stakeholders should, co-ordinate the development of London's network of town centres in the context of Map 2.6 and Annex 2 so they provide:
- a the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development
  - b the structure for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners, particularly by public transport, cycling and walking
  - c together with local neighbourhoods, the main foci for most Londoners' sense of place and local identity within the capital.
- B Changes to the network, including designation of new centres or extension of existing ones where appropriate, should be co-ordinated strategically with relevant planning authorities including those outside London. Identified deficiencies in the network of town centres can be addressed by promoting centres to function at a higher level in the hierarchy or by designating new centres where necessary, giving particular priority to areas with particular needs for regeneration (see Policy 2.14) and better access to services, facilities and employment. Centres with persistent problems of decline may be reclassified at a lower level.

## PLANNING DECISIONS

- C Development proposals in town centres should conform with policies 4.7 and 4.8 and:
- a sustain and enhance the vitality and viability of the centre
  - b accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations
  - c support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services
  - d be in scale with the centre
  - e promote access by public transport, walking and cycling
  - f promote safety, security and lifetime neighbourhoods
  - g contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
  - h reduce delivery, servicing and road user conflict.

## LDF PREPARATION

- D Boroughs should:
- a in light of local and strategic capacity requirements (Policy 4.7), identify town centre boundaries, primary and secondary shopping areas in LDF proposals maps and set out policies for each type of area in the context of Map 2.6 and Annex 2
  - b in co-ordination with neighbouring authorities, identify other, smaller centres to provide convenient access, especially by foot, to goods and services needed on a day to day basis, develop their role as foci for local neighbourhoods, and relate these

- centres to the network as a whole to achieve its broader objectives
- c manage declining centres proactively, considering the scope for consolidating and strengthening centres identified as being in decline by seeking to focus a wider range of services, promoting diversification, and improving environmental quality
- d support and encourage town centre management, partnerships and strategies including business improvement districts to promote safety, security and environmental quality
- e promote the provision of Shopmobility schemes and other measures to improve access to goods and services for older and disabled Londoners.

0.4 This SPG is related closely to other Mayoral strategies including those for Economic Development, Transport, Housing, Culture, Climate Change and Energy, Waste, Noise, Water and Air Quality; and SPGs on Housing, Accessible London, Sustainable Design and Construction, Planning for Equality & Diversity and Shaping Neighbourhoods.

0.5 The SPG gives practical advice for those preparing, scrutinising or contributing to planning policy, masterplans or planning applications relating to town centres. It recognises that London's centres are all different, with individual issues and opportunities. It is not a manual prescribing a universal format for development in or management of town centres, but rather aims to give local authorities and other strategic and local partners matters to consider, as a starting point for finding individual solutions to suit local situations.

### STATUS OF THE SPG

0.6 As SPG, this document does not set new policy, but rather explains how policies in the London Plan should be carried through into action. It will assist boroughs when preparing Local Plans and will also be a material planning consideration when determining planning applications. It will also be of interest to landowners, developers, planning professionals and others concerned with development in London's town centres and Strategic Outer London Development Centres. This SPG does not form part of the development plan, but can be taken into account as a further material consideration when considering planning applications. It therefore has weight as a formal supplement to the London Plan.

### NATIONAL PLANNING POLICY CONTEXT

0.7 The **National Planning Policy Framework (NPPF)** sets out the Government's planning policies for England with a presumption in favour of sustainable development at its heart. The framework (in paragraphs 23 to 27) sets out policy guidance to ensure the viability and vitality of town centres. Planning policies should be positive, promote competitive town centre environments and manage the growth of centres over the plan period. Paragraph 161 of the NPPF contains further, more specific guidance on the use of evidence base data for the purpose of assessing:

- the quantitative and qualitative need for economic activity including retail and leisure development
- the role and function of town centres and trends in performance
- the capacity of existing centres to accommodate development - including land for economic development and residential.

0.8 This SPG is also prepared in the context of associated Government practice guidance published in March 2014.

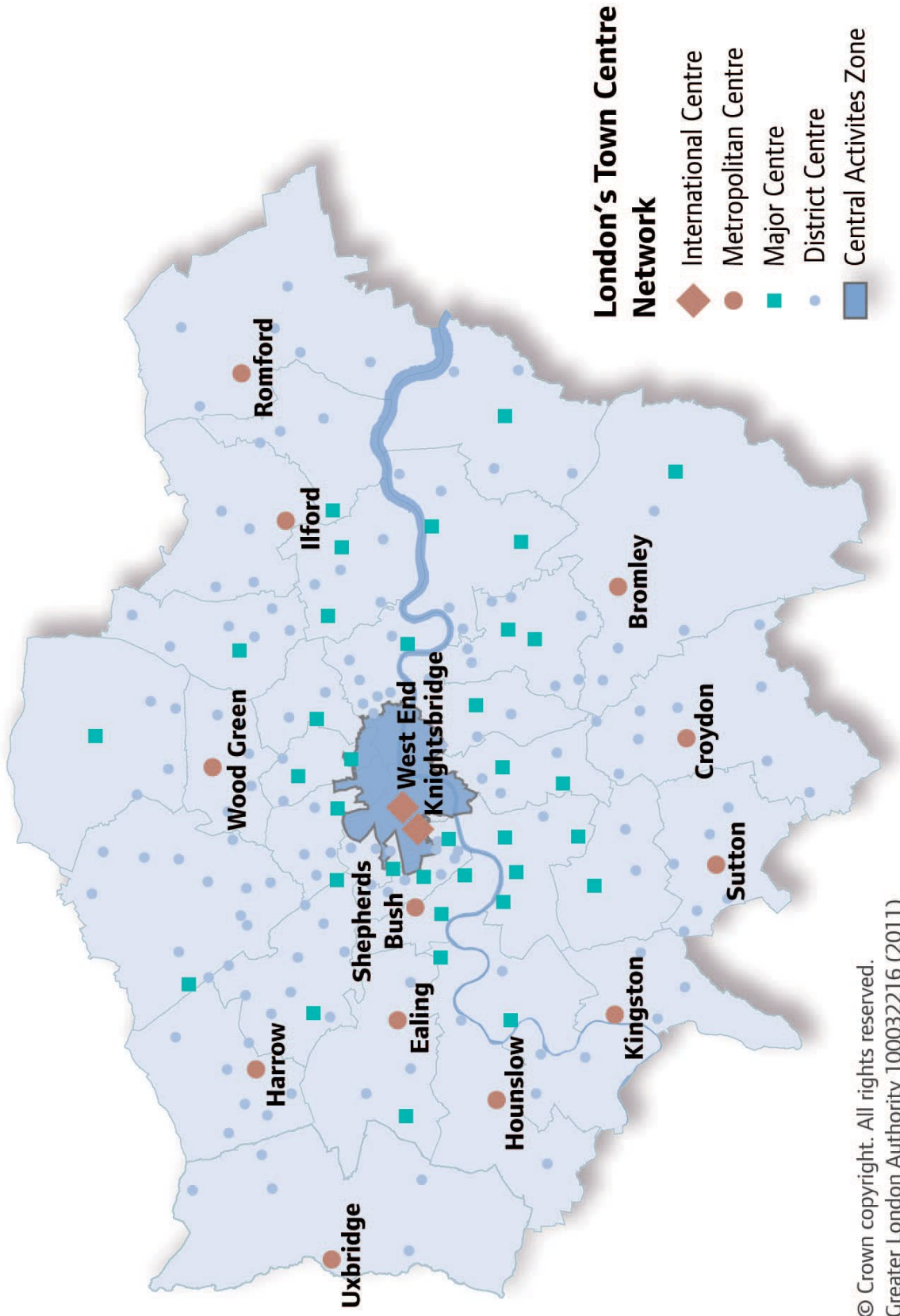
### LONDON'S TOWN CENTRES

0.9 London has a complex pattern of town centres. While each town centre performs a different function according to the community and area it serves, the London Plan identifies five broad types of town centre within London: International, Metropolitan, Major, District, Neighbourhood/Local centres and, within the Central Activities Zone, a supplementary classification, the CAZ Frontages<sup>4</sup>. The London Plan network is illustrated in Map 1.1.

0.10 London also contains **Strategic Outer London Development Centres** (see section 7). These are locations in outer London or adjacent parts of inner London with one or more specialist strategic economic functions of greater than sub-regional importance.

0.11 London has strong functional linkages with the **wider south east of England**. Flows of expenditure on retail and leisure cross the metropolitan boundaries and are also influenced by commuting patterns to workplaces. Distribution networks servicing the retail, leisure and business functions of London's town centres are complex with many supply chains originating from outside London. These interrelationships are considered in this SPG.

MAP 0.1 LONDON TOWN CENTRE NETWORK (LONDON PLAN, 2011)



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# SUMMARY: PROMOTING SUCCESSFUL AND VIBRANT TOWN CENTRES

## CHALLENGES AND OPPORTUNITIES

Town centres across London are facing unprecedented challenges with major structural changes affecting the retail industry<sup>5</sup>. The recent recession dampened consumer spending and longer term growth in comparison goods retail spending is not projected to grow as strongly as previously anticipated. Alongside these pressures, changes in consumer behaviour and the growth in on-line and multi-channel retailing are having a profound effect on town centres. Some retailers are reconfiguring their store portfolios to fewer and larger stores<sup>6</sup>, with highly flexible and adaptable formats, maintaining a physical presence in the stronger, more dominant centres.



At the same time projected growth in London's population presents a significant opportunity for London's town centres to become high quality, liveable places, generating local footfall, supporting vibrant and viable town centres with greater levels of housing and sustainable modes of travel. Changes in technology can also be harnessed to the benefit of town centres including the growth in click and collect services, the potential to promote their leisure and specialist offers and market their unique brand as places to visit.

## LONDON'S TOWN CENTRES ARE UNIQUE...

While parts of London, and its associated network of town centres certainly do face some of these challenges, the capital also has distinct strengths and opportunities. It is unique:

- in the scale and density of its population (almost four times bigger than much looser conurbations elsewhere in the country)
- in its wealth and growth prospects (little more than an eighth of the national population but over a fifth of its output)
- in the scale and density of the transport and other networks which serve it, reducing dependence on private cars
- in its diversity, international connections, visitor base and its culturally rich and attractive centres
- in its governance arrangements with a unique two tier structure which provides both a strategic perspective and coordination to address the issues facing town centres, and the flexibility for local borough and partnership action to tackle the very varied local expressions of these.

## NO 'ONE-SIZED FITS ALL APPROACH'

Town centres of different scales will be affected differently by these challenges and opportunities. Work by the Outer London Commission<sup>7</sup> suggests that the larger, attractive centres including London's International centres and the stronger Metropolitan and Major centres are those mostly likely to be able to attract continued investment in comparison and convenience goods retail. At the other end of the scale, the neighbourhood and more local centres should continue to play to their strengths in providing local convenience and essential services to their local resident population.

The centres in the middle tier, including some of the weaker Major centres and many District centres will face the greatest challenges, finding it difficult to attract significant new retail investment and facing the threat of some retailers moving out and rising levels of vacancy. All town centres will continue to face considerable challenges from car based, out of centre retail and leisure development, as well as the complexities of land ownership and sometimes competing interests in their future<sup>8</sup>.

## PROMOTING SUCCESSFUL AND VIBRANT TOWN CENTRES

Planning has a key role to play in promoting vibrant and viable centres and helping them to be flexible, resilient and adaptable to change. The London Plan and this SPG promote strong, successful, vibrant and viable town centres as the preferred locations beyond the Central Activities Zone for commercial development and intensification, including housing development (London Plan policy 2.15).

To help town centres meet these challenges and opportunities the following principles are advanced in this SPG:

## 1. Supporting the evolution and diversification of town centres



This SPG promotes the evolution and diversification of town centres to support a range of uses and activities to meet the challenges they face having regard to the current and potential future roles of each centre in the London Plan network. Alterations to London Plan policy will support this process. However, within current London Plan policy, there remains significant scope for boroughs and local stakeholders to bring forward visions and strategies for their town centres to reconfigure and diversify them recognising:

- the potential of the International, Metropolitan and Major centres to accommodate growth especially in comparison goods retailing (London Plan policy 4.8Ba)
- the particular roles District, neighbourhood and more local centres to accommodate local needs for

convenience retailing and essential local services (policy 4.8Bb)

- the potential for centres to adapt and evolve to becoming thriving community hubs accommodating a diverse range of uses including leisure, culture, tourism, night time economy, employment and housing alongside traditional retailing, civic functions, community services and social infrastructure (policy 2.15Cc)
- the specialist roles of some centres, for example in niche retailing, street markets, arts, culture, tourism, entertainment and the night time economy (policy 2.15Cc, paragraph 2.73 and policies 4.5–4.8)
- the potential for reconfiguration of uses including, where appropriate, a more focussed and vibrant retail core, whilst supporting greater flexibilities to non-retail uses with active frontages particularly in secondary areas
- the need for a co-ordinated approach to redevelopment to accommodate economic and housing growth through intensification (policy 2.15Cb) and for responsive local policies to manage change in primary shopping areas and primary and secondary frontages (policy 2.15Da).

Further guidelines on the different mix of uses that can make up vital and viable town centres are set out in Section 1 of this SPG including guidance on the release of surplus office capacity, measures to support viable community pubs and managing clusters of activity, including betting shops and hot food takeaways.

### **2. Delivering mixed use housing intensification**

Strategies for town centres should be proactive and investigate the scope for intensification

at higher densities including for residential development (London Plan policy 2.15Cb).

Implementation of policy to secure the diversification and housing potential of town centres through mixed use intensification should support a strategic and co-ordinated approach to development and regeneration, rather than piecemeal incremental changes of use from ground floor retail to residential. Draft further alterations to the London Plan (FALP) set out further proposals to support the planned redevelopment and reconfiguration of town centres. Careful consideration of prior approvals for permitted development change of use from retail to residential will be required to ensure that it does not undermine the future sustainability of centres including their potential for housing intensification and mixed use development.



Intensification of development will depend on good public transport accessibility. Embedding more sustainable travel modes, access and servicing must be reflected in local policy and



implementation. GLA research (Accommodating Growth in Town Centres) provides examples of how this approach might be applied to town centres in the current context of demand for town centre uses and the opportunity to deliver housing. This may require greater flexibility and innovative approaches to land assembly including where appropriate through the compulsory purchase process (London Plan policies 2.7, 2.15).

Delivering intensification, including mixed use development and housing can be supported through new models or mechanisms for town centre investment, housing delivery and ongoing asset management. Potential mechanisms include town centre investment models, private rented sector (RPS), Real Estate Investment Trusts, Local Asset Backed Vehicles, Tax Increment Financing, Direct Funding and Housing Zones. Further details are set out in Section 2 of the SPG.

### 3. Quality Matters



The quality of development and environment is of paramount importance if town centres are to be successful places to live, work and visit and attract investment. Issues of quality should be integral to strategies to re-imagine and regenerate town centres as community hubs with a diverse range of services and

an increased residential population with an improved quality of life.

Section 3 of the SPG provides guidance on a range of matters including:

- public realm
- safer town centres
- planning for lifetime neighbourhoods and under-served areas
- improving access and inclusion in town centres
- supporting small shops and street markets
- sustainable town centres and the response to climate change.

### 4. Promoting Accessibility and Connectivity

Outside central London, town centres are among the most accessible locations by public transport. As such they can support high trip generating uses at higher densities than areas with lower public transport accessibility. Improvements in public transport access will be delivered through a range of transport projects and interventions identified by the Mayor in the London Plan and Transport Strategy, many of which will be of direct benefit to London's town centres such as Crossrail 1 and 2, Thameslink Programme, tube upgrades and improvements to the bus network.



Local connectivity is a key determinant for the liveability of an area – as well as the economic health and vitality of town centres across London. Initiatives such as ‘Legible London’ and ‘better streets’ can be used to improve wayfinding and deliver physical improvements that improve the accessibility of town centres and ease of movement for pedestrians. Boroughs also have a crucial role in supporting the Mayor’s vision 2020 for cycling through collaboration with TfL and the GLA to implement the central London Grid, Quietways and ‘mini Hollands’.

London’s strategic roads and the national road network, play an important economic role by supporting the movement of goods, services and people to, from and within town centres. In setting out the London street-types family, the Mayor’s Roads Task Force seeks to strike an appropriate balance between the movement and place functions of each street type as well as support the functioning of the wider network.

Guidance is provided on the flexibility, focused on parts of outer London, in London Plan parking standards to ensure they can be tailored at a local level to meet the needs of individual outer London town centres. This reflects the different characteristics, public transport accessibility levels and aspirations of different places. For example between mini-Hollands and other outer London centres which face significant competition from out of London centres. Where there are identified issues of town centre vitality and viability, Policy 6.13E(c) provides for a more flexible approach to the provision of public car parking in outer London to serve the town centre as a whole and support its regeneration. Further guidelines on accessibility, connectivity and parking are set out in Section 4.



### 5. Town centre regeneration and initiatives

The strategic principles in this SPG to support the diversification and housing intensification of centres in line with London Plan policies 2.15Cb and Cc, alongside improvements to quality and accessibility, will help to drive footfall, town centre viability and regeneration. These measures can be complemented by strategies for Regeneration Areas, Opportunity Areas and Intensification Areas together with regeneration funding, resources and initiatives including Business Improvement Districts. The Mayor wants to make London an even better place to live and work. To do this town centres and high streets need to be hard working, resilient, innovative and growing. This is why the Mayor is investing £175 million in bolstering London high streets. The Mayor is looking at the case for further investment and propositions for future regeneration activity. Alongside this investment, boroughs and other town centre partners are encouraged to:

- consider a range of short, medium and long term resources, initiatives, funding streams and partnerships to secure town

- centre renewal
- secure temporary or ‘meanwhile’ uses of vacant properties
- seize opportunities to harness the potential of the internet for the benefit of residents, visitors and businesses in town centres
- support proactive land assembly.

Further details are set out in Section 5 of the SPG.



## 6. Proactive town centre strategies

The response to the challenges and opportunities for town centres must be tailored to each individual centre having regard to its current and future role and function in the wider town centre network and potential for mixed use intensification. It is essential therefore that local strategies for town centres should be developed in collaboration with strategic and local partners. Cross-border co-operation between local authorities within London and those outside should support a co-ordinated approach to town centre development.

This SPG reaffirms a strong town centres first approach in the London Plan to accommodating new retail, leisure and commercial development, encouraging development within town centres, or in well

integrated edge of town centre locations (Policy 4.7) where car dependency is lower and accessibility better. Given the higher levels of car use, lower levels of public transport accessibility and the need to tackle climate change and congestion, the Mayor strongly discourages out of centre development (London Plan Policy 4.7Cd). To implement this approach this SPG supports:

- a proactive partnership approach to accommodate identified needs for retail, leisure and other employment space and promote mixed use development with housing in line with London Plan policy 2.15A and Cb
- positive steps to bring sites forward for development through collaboration with local stakeholders, supporting site assembly and where appropriate use of compulsory purchase powers (policy 2.7Ah)
- a rigorous approach to sequential and impact tests for retail, leisure and commercial development with sympathetic treatment of well integrated edge of town centre sites where no suitable, available or viable town centre (policy 4.7Bb,c)

Implementation and progress should be monitored closely through regular town centre health checks. Further details are set out in Section 6 of the SPG.

**SPG IMPLEMENTATION (SUMMARY)  
– PROMOTING VIBRANT AND VIABLE  
TOWN CENTRES**

Boroughs and town centre partners are encouraged to:

- a promote strong, successful, vibrant and viable town centres
- b develop their role as the hub of the community, providing a sense of place and identity and contributing to healthy and lifetime neighbourhoods
- c recognise the opportunities and challenges from changes in consumer behaviour and the growth of internet and multi-channel retailing
- d support the evolution and diversification of town centres using London Plan policy to support a range of uses and activities to meet the challenges they face
- e promote flexible, adaptable and resilient town centres
- f draw on London Plan policy to support the intensification of town centres, particularly for mixed use development including higher density housing together with supporting infrastructure (including transport, social and digital connectivity)
- g enshrine high standards of quality in design, the town centre environment and public realm
- h deliver improvements to accessibility and connectivity and capitalise on this accessibility to deliver higher density development, particularly near to transport nodes
- i note the flexibility already provided by the Plan's town centre parking policies to support town centre vitality and viability in outer London
- j re-imagine, revitalise and regenerate town centres, bring properties back

- into use and attract investment
- k work collaboratively with strategic and local stakeholders to develop strong and proactive visions, strategies and initiatives for town centres.
- l implement the London Plan 'town centres first' approach
- m develop cross-border co-operation between local authorities within London and those outside to support a co-ordinated approach to town centre development and monitor trends in health checks.



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## ENDNOTES

<sup>1</sup> Mayor of London. The London Plan. Spatial Development Strategy for Greater London. GLA. July 2011

<sup>2</sup> Outer London Commission. Third report. GLA 2014

<sup>3</sup> Department for Communities and Local Government. National Planning Policy Framework. CLG, 2012. Mary Portas. The Portas Review. An independent review into the future of our high streets. December 2011. Other research references provided throughout the SPG.

<sup>4</sup> See London Plan, 2011, Annex 2 for definitions

<sup>5</sup> See Experian Business Strategies, Consumer Expenditure and Comparison Goods Floorspace Need in London, GLA, 2013; Outer London Commission, Third Report. GLA, 2014. The Grimsey Review – An Alternative Future for the High Street, September 2013; London Assembly Planning Committee, The Future of London's town centres, GLA, 2013. Beyond Retail. Redefining the shape and purpose of town centres. BCSC taskforce, Nov 2013.

<sup>6</sup> DTZ bulletin. The Authority. Summer 2012

<sup>7</sup> Outer London Commission, Third Report. GLA, 2014

<sup>8</sup> Mayor of London. The Outer London Commission. 2nd Report. GLA, 2012

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DEEDON

REPERTOIRE

Nando's



# 1. SUPPORTING THE EVOLUTION AND DIVERSIFICATION OF TOWN CENTRES

1.0.1 In the future, town centres will need to move beyond retail and become vibrant centres for living, culture, shopping, entertainment, leisure, business, civic, community and social infrastructure. This chapter of the SPG provides guidance on a range of London Plan policies for a diverse and viable mix of uses and the beneficial impact of mixed use development on town centre footfall, vitality and viability.

## 1.1 RETAILING

1.1.1 Retailing plays a vital role in London's town centres. The availability of a mix of retail underpins the Mayor's objective to promote sustainable access to goods and services for all Londoners. It accounts for around £36bn<sup>1</sup> of household consumer expenditure in London and employs over 400,000 people in the capital<sup>2</sup>. However it is clear from a range of evidence and projections<sup>3</sup> that centres can no longer depend entirely on retailing for their future success and prosperity.

1.1.2 Research by Experian<sup>4</sup> suggests that:

- Expenditure on comparison retail (non-perishable goods) is projected to increase from around £23bn in 2011 to £41bn by 2031 (or 3.0% per annum, compared to 4.3% per annum in the London Plan projection).
- Expenditure on convenience goods (food and drink) is projected to increase from around £13bn in 2011 to over £19bn

by 2031 (or 2.2% per annum compared to 1.5% annum in the London Plan projection).

### On-line and multi-channel retailing<sup>5</sup>

1.1.3 The latest evidence also points to an increasing proportion of expenditure on retail goods being spent via the internet and other special forms of trading (SFT)<sup>6</sup>. The market share of non-store comparison goods retail sales (SFT) in London was estimated at 11 per cent in 2011<sup>7</sup> and is projected to increase to around 21 per cent by 2021<sup>8</sup>. Some commentators<sup>9</sup> suggest that this may be an underestimate.

1.1.4 The growth in multi-channel retailing poses both challenges and opportunities for London's town centres, although the degree to which centres are affected will vary. Work by the Mayor's Outer London Commission<sup>10</sup> suggests that the more attractive, larger centres (including many Metropolitan and the stronger Major centres) will be best placed as competitive locations to provide multi-channel retailing facilities and secure investment in higher quality comparison retail floorspace. Medium-sized centres, including some Major centres and the majority of District centres will face the greatest challenges to their retail base (particularly for comparison goods). Neighbourhood and more local centres, which play an important role in providing every day, top-up convenience goods and services, should continue to play to these strengths.

1.1.5 Alongside these trends, growth in the use of 'click-and-collect' services should be considered. When estimating floorspace requirements in retail needs

assessments it will be necessary to adjust the market share of non-store retail sales to take account of the fact that a proportion of internet sales are fulfilled by 'in-store' pickers for home delivery. For the London-wide study, Experian make an allowance for this by reducing the SFT shares by 25 per cent for comparison goods and 70 per cent for convenience goods. There remains great uncertainty with regard to the likely level of growth in SFT and the trends and forecasts should continue to be monitored closely and reflected in local retail need assessments.

### **Retail floorspace demand to 2036**

- 1.1.6 The Experian research suggests that there is need for an additional 0.9-2.2 million sq.m comparison goods retail floorspace in London by 2036<sup>11</sup>. This takes into account growth in spending by London's population, commuters and tourists, and making allowances for retailers making more efficient use of existing space (1.9 per cent per annum) and the deduction for growth in SFT (adjusted for sales fulfilled in-store). When schemes in the planning pipeline are factored into the analysis, London could still need an additional 0.4-1.6 million sq.m comparison goods retail floorspace by 2036. These projections are lower than those prepared to inform the adopted London Plan which contained forecasts of 1.8-2.9 million sqm (gross pipeline demand) and 1.3-2.2 million sqm (net pipeline demand) to 2031.
- 1.1.7 Experian produced alternative development scenarios including a 'quality' scenario which factored in improvements to the quality of the larger town centres in the network (International, Metropolitan and Major centres). Table 1.1 below summarises the latest strategic projections for comparison goods floorspace need from Experian under the baseline, pipeline and quality scenarios. The distribution of the gross demand projections are summarised in Table 1.2 which shows that 36% of the baseline need is in outer London, 18% in inner London and 46% in central London.
- 1.1.8 The Outer London Commission<sup>12</sup> notes that the Experian scenarios still point to substantial quantitative retail need in London overall (although less than projected in the previous research that informed the 2011 London Plan). The Commission urges caution on the 'pipeline scenario' since it is inevitable that not all of the pipeline schemes will be built out and thus the need for additional comparison retail floorspace is likely to exceed that indicated under this scenario. For all scenarios the Commission considered that it is more appropriate to plan on the basis of 'gross' rather than 'net' need. This is because a large part of vacant retail space is either obsolete or not fit for modern retail purposes and therefore may not absorb the demand for new space (which is assumed in the 'net' scenarios'). Rather, it is considered more likely that the additional demand will come forward as new or redeveloped/ reconfigured floorspace to meet London's qualitative (as well as quantitative) need. This will need proactive planning to accommodate growth in town centres, and where appropriate new centres in Opportunity Areas, having regard to the impact of

polarisation and restructuring of retailing in the capital.

- 1.1.9 Further details of the scenarios are provided in the Experian report, including interactive tables which allow calculations of need at borough and town centre level including sensitivity tests. The Outer London Commission and Experian work suggests that the gross total demand for comparison goods retail will be distributed unevenly across London and its town centres.

Many centres, particularly the larger, stronger centres, will attract gross new development. However, the research suggests that in parts of the capital there are local surpluses of retail floorspace capacity, including poorly configured space that is not fit for modern retailing needs. Whilst many centres will still attract new investment in retail space, in net terms there may be reductions in overall comparison goods retail floorspace in some centres.

**TABLE 1.1 COMPARISON GOODS RETAIL FLOORSPACE NEED PROJECTIONS 2013-2036 (GROSS/NET)<sup>13</sup>**

Scenario	Gross need million sq m	Net need million sq m
Baseline (excludes pipeline schemes)	2.2	0.9
Pipeline (including committed schemes)	1.6	0.4
Quality (includes pipeline and uplift in quality)	1.7	0.5

Source: Experian Business Strategies

**TABLE 1.2 COMPARISON GOODS RETAIL FLOORSPACE NEED PROJECTIONS 2013-2036 (GROSS)**

	Baseline (sqm)	Pipeline (sqm)	Quality (sqm)
Outer London	0.8	0.5	0.5
Inner London (excl. CAZ)	0.4	0.2	0.2
CAZ	1.0	0.9	1.0
London	2.2	1.6	1.7

Source: Experian Business Strategies

1.1.10 The implications of the contraction in the growth rate in projected demand for comparison goods retail floorspace is being considered in an alteration to the London Plan. However, within current London Plan policy, boroughs should continue to assess the need for new comparison and convenience goods in line with LP policies 4.7 and 4.8 having regard to the 2013 Experian study.

1.1.11 Having regard in particular to London plan policies 2.15Cb and 4.8Ba/b, London's town centres should adapt their retail offer, diversify and accommodate housing (see section 1.4 and section 2) to attract footfall and sustain their vitality and viability. This process of change can be managed through supportive local plan policies, town centre area action plans and site allocations as well as through policies for primary shopping areas and primary and secondary frontages in line with LP policy 2.15Da.

### **Local plans and assessments of need for retail floorspace**

1.1.12 Experian's consumer expenditure and comparison goods retail floorspace need estimates provide the strategic context for local retail (and leisure) needs assessments in line with London Plan policy 4.7, the NPPF and practice guidance. The estimates are based upon the consultant's broad, strategic assessment of floorspace requirements. Local authorities are advised to:

- test the strategic estimates of need through more refined, local level studies
- investigate potential sources of capacity at specific centres to accommodate the overall need for retail floorspace.

1.1.13 In particular, Local Plans and associated local assessments of comparison and convenience goods retail need in London should take into account:

- the projections and findings associated with the strategic study and update the demographic and consumer expenditure assumptions as new information becomes available
  - robust and up to date estimates and projections of on-line, multi-channel and other special forms of trading, factoring in SFT sales from retail stores
  - local factors including the quality of the retail offer and resident shopping patterns (evidenced through household surveys for example)
  - cross-border flows of resident expenditure across borough boundaries within London and across boundaries with the wider south east of England
  - locally sensitive estimates of commuter and tourist spend
  - locally sensitive estimates of town centre turnover, baseline sales densities and projected floorspace efficiency growth
  - the potential trade draw from retail developments in the planning pipeline (in particular when considering retail capacity and cumulative impact)
  - accessibility by walking, cycling, public transport and private modes
  - the mix of convenience and comparison goods retailing floorspace in superstores and supermarkets
  - the extent to which shops may be under and over-trading; and
  - areas that are under-served by shopping facilities (see section 3.2), paying attention to both the availability of different types of goods and services, and how accessible they are.
-

## Developing the retail mix in town centres

1.1.14 To be competitive, promote choice and add vitality and a distinctive offer, town centres should support a good balance of different types of multiple and independent retailers providing access to a range of local services. Boroughs are encouraged to:

- plan for a strong retail mix in terms of range, size, quality and rentals
- support specialist shopping with good quality, differentiated product offers; and niche retailers targeting very specific product markets
- meet identified demand for small shops (see section 3.4) and lower threshold enterprise space (see section 1.3) suitable for start-up businesses and independent retailers, particularly in secondary frontages
- support the range of street and other types of markets (see section 3.5);
- manage conversion of smaller shops to larger units where appropriate

## Government changes to planning use class orders

1.1.15 In 2013 the Government extended the scope of “permitted development” by removing the need to apply for planning permission for many changes of use that previously required it. This included new temporary permitted development rights to allow new retail, financial and professional services, restaurants, cafes and businesses to open for up to 2 years in buildings designated as A1, A2, A3, A4, A5, B1, D1 or D2 classes (shops, financial services, restaurants, pubs, hot food takeaways, business, non-residential institutions, leisure and assembly).

1.1.16 In 2014 Government amended the GDPO to allow flexibilities between planning use classes to support changes of use between retail uses to new homes<sup>14</sup>. The Mayor is concerned that the unmanaged, pepper potted conversion of shop units to low density housing is likely to cut across the planned approach to comprehensive, managed release proposed by the Outer London Commission<sup>15</sup> and draft FALP to deliver substantial, high density, retail or residential led mixed-use redevelopment in larger centres (Metropolitans and some Majors); consolidation of retail frontages through residential led mixed use development in medium-sized centres (some Majors, and the majority of Districts); and ensuring the availability of viable convenience retail and service functions in Neighbourhood and more local centres. It is also important to consider how it might be possible to secure necessary funding for transport investment in the context of this new flexibility.

1.1.17 For consistent interpretation in London, it is considered that the term ‘key shopping areas’ in the Statutory Instrument includes those parts of town centres defined in Local Plans as primary shopping areas, primary and secondary frontages, and neighbourhood and more local centres (policy 2.15Da). When determining applications for prior approvals for change of use from retail to residential, boroughs are encouraged to take into account the impact of proposals on:

- the vitality and viability of town centres including CAZ frontages (London Plan policy 2.15Ca)
- the potential for a co-ordinated approach



to housing intensification in town centres (London Plan policy 2.15Cb), having regard to the approach advanced by the Mayor’s Outer London Commission (see Section 1.4 and Section 2 of this SPG)

- the availability of local convenience retailing and essential services (London Plan policy 4.8Bc).

### SPG IMPLEMENTATION 1.1

Boroughs and town centre partners are encouraged to:

- a Promote a viable and diverse mix of retailing including independents, multiples and specialist provision to meet identified and projected needs
- b Assess the realistic level of demand for new and reconfigured retail floorspace in local retail capacity studies having regard to: consumer expenditure projections (comparison and convenience goods); demographic projections; up-to-date estimates of growth in on-line and multi-channel retailing; improvements to the productivity of retail floorspace; the committed pipeline of retail floorspace development; and the role and function of town centres
- c Understand the changing qualitative need for retail floorspace including that for modern, fit-for-purpose retail floorspace
- d Reconcile local assessments of retail demand with the latest strategic London-wide assessment for comparison goods retail
- e Develop proactive local plans and policies to accommodate projected demand for retail floorspace (including improvement in quality of space) through mixed use redevelopment within primary

or viable secondary town centre frontages or on well integrated edge of centre sites

- f where retail floorspace is in over-supply, develop local policies in line with London Plan policy to manage changes to non-retail uses particularly in secondary and tertiary frontages and support mixed use redevelopment including housing
- g keep local plan policies under regular review to allow town centres and the mix of retail uses relative to cultural, leisure, business, residential, civic and community services to evolve over time to remain competitive
- h define primary shopping areas, primary and secondary frontages in Local Plans and take into account the impact of Government’s retail to residential permitted development rights proposals on the vitality and viability of town centres, the potential for a co-ordinated approach to housing intensification in town centres and the availability of convenience retail and essential services.

## 1.2 ARTS, CULTURE, LEISURE AND THE NIGHT TIME ECONOMY

- 1.2.1 London’s cultural, leisure and tourism offer and night time activities make a vital contribution to the economy and the vitality and viability of town centres and should be an important component in the evolving mix of town centre uses. This section provides guidance on the implementation of London Plan Policies 4.5 and 4.6 to promote and manage leisure, tourism, arts and cultural development/animation and the night time economy in London’s centres and

support inclusive access.

### (i) Arts and Culture

1.2.2 Embracing art and culture is integral to the success and renewal of London's town centres and enhances their vibrancy, distinctiveness and character.

To help local authorities, town centre managers, business improvement districts and local stakeholders to improve the quality and ambition of culture in town centres the GLA launched the 'Culture on the High Street'<sup>16</sup> guide which:

- Presents the fantastic potential for culture and the high street
- Proves how creative thinking can boost the economy and jobs
- Showcases examples

- Shares useful resources to help sustain cultural activities.

1.2.3 The guide includes 16 case studies highlighting the importance of quality and imagination and concludes that the best results are achieved through strong partnerships.

### Strategic Cultural Areas

1.2.4 Strategic Cultural Areas (SCA) are strategically significant clusters of heritage sites, internationally renowned cultural institutions and their settings. London Plan Policy 4.5Af enables boroughs to provide specific protection and enhancement for SCA in light of their local circumstances.



Greenwich Town Centre – Strategic Cultural Area

1.2.5 To implement Policy 4.5Af boroughs are encouraged to:

- identify the London Plan SCA in local plan proposals maps
- define the special characteristics of their SCA in local plans
- support initiatives to enhance them and related infrastructure, for example through:
  - enhancement of the quality and range of the visitor offer
  - promoting inclusive design principles
  - improvements in accessibility
  - qualitative improvements to the public realm and built environment
  - enhancement of their wider settings
  - extending their offer by packaging, branding and marketing them together with groups of more local/lesser known attractions.<sup>17</sup>

1.2.6 The Mayor will work with London & Partners and others to develop other strategically important clusters of cultural and tourist attractions. New SCA areas should be of strategic scale and significance and contribute to London's iconic cultural offer. Cultural institutions of local importance are more appropriately identified in local plans.

### **Cultural Quarters**

1.2.7 Boroughs are encouraged to develop and promote clusters of cultural activities and related uses as *cultural quarters* (London Plan Policy 4.6Cc) and secure their contribution to regeneration (Policy 2.14). This may be associated with an anchor activity, such as a theatre, cinema, artist studios or specialist retail functions like galleries, antiques or craft markets, but can also extend across the whole town centre to create mutual benefits for other town centre activity.

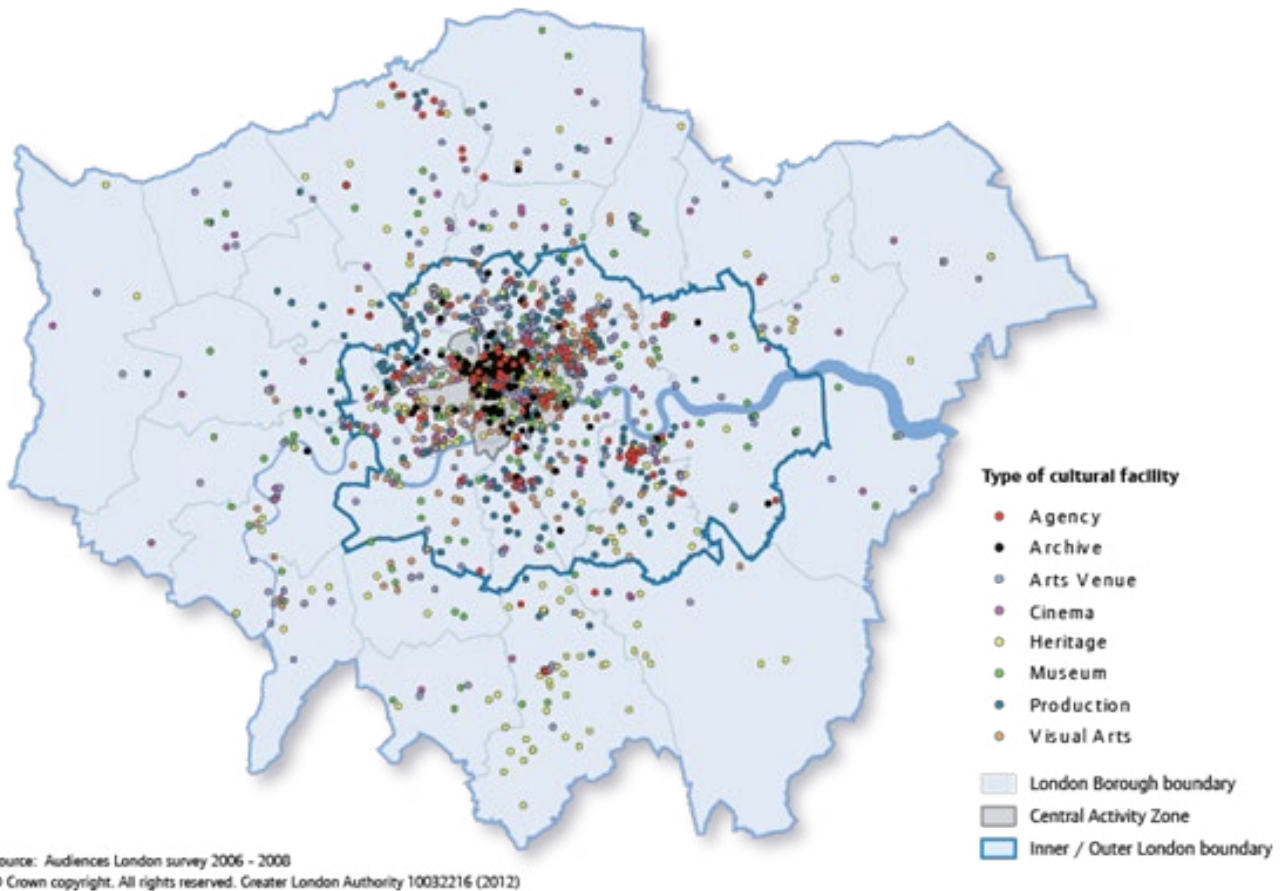
Sustained renewal and enhancement of heritage or otherwise distinct townscape can contribute to developing the brand of cultural quarters. Careful town centre management may be required to maintain and enhance the integrity of the quarter's offer and brand.

1.2.8 A successful cultural quarter should:

- create an authentic cultural experience
- form the basis for sustained activity, which may include transitory functions, such as festivals and/or temporary performance and exhibition space
- contribute to wider objectives around improving the quality and economic vitality of a town centre
- support provision of flexible and creative workspace (see creative industries below)
- contribute to town centre and neighbourhood based approaches to urban regeneration (new provisions focused on areas with deficiencies in facilities can provide a cultural focus)
- encourage a mixture of consumption (especially restaurants, bars as well as retail) alongside cultural assets that are likely to attract visitors and generate interest
- support schools, higher and further education where appropriate and nurture volunteers, new talent and audiences.

### **Creative industries**

1.2.9 London's 'creative industries', such as the arts, architecture, advertising, publishing and leisure software are at the global forefront of their kind and contribute significantly to London's economy. The Mayor's Culture Strategy update<sup>18</sup> provides examples of how creative businesses and cultural organisations can help shape and

**FIGURE 1.1 CULTURAL FACILITIES PROVISION IN LONDON**

improve town centres.

1.2.10 Boroughs are encouraged to:

- enhance and protect creative work and performance spaces and related facilities in areas of defined need (Policy 4.6Ca)
- ensure the availability of a range premises in terms of type, size and cost for creative industries, low threshold enterprise space and artist studios in or around town centres as part of wider regeneration initiatives
- support the temporary use of vacant buildings (see section 5.2) for performance, artistic and creative work where possible.

### Addressing gaps in provision of cultural facilities

1.2.11 Figure 1.1 illustrates in very broad terms that some parts of London may be deficient in the current provision of cultural facilities in London<sup>19</sup>. To implement London Plan policy 4.6Bd, boroughs are encouraged to identify more local areas of deficiency in cultural facility provision, including arts venues, cinemas, visual arts, museums/archives, festivals and pop-up events and consider measures to address gaps in provision, including policies in local plans to enhance and protect cultural facilities in areas of defined need.

**(ii) Leisure**

1.2.12 London has a fast growing and relatively young population. Demand for leisure<sup>20</sup> is driven by demographic growth as well as increased spending power. London household spending on restaurants, cafes, takeaways, pubs and wine bars is projected to increase from £8.9bn in 2011 to £15bn in 2036, and other leisure uses are projected to increase from £3.4bn in 2011 to £8.4bn in 2036<sup>21</sup>.

**Night time economy**

1.2.13 The evening and night time economy (NTE) can make a significant contribution to town centre vitality and viability. It generates jobs and improves incomes from leisure and tourism activities, contributing not just to the vitality of the town centre but also making it safer by increasing activity and providing ‘passive-surveillance’. However, it can also be associated with noise, crime, anti-social behaviour, community safety problems and detrimental effects on public health, which, without appropriate management and mitigation, impacts on the quality of life of local residents, workers and NTE customers. This is particularly the case for nightclubs, large drinking establishments, live music venues and late night takeaways and especially for locations with a high density of such establishments. Large concentrations of late night uses may also mean places lack vitality during the day.

1.2.14 London Plan policy 4.6 provides a framework for local plans and other local strategies to manage adverse impacts, maximise benefits and maintain an atmosphere in which facilities are accessible and the public

realm feels safe and open to everyone. Annex 2 of the Plan identifies the strategically important clusters of night time activities. These clusters can be particularly important to local economies and town centre regeneration.

1.2.15 To implement policy 4.6 local authorities should:

- a gather a local evidence base on the issues/opportunities of the local NTE, considering scale, location, timing, mix, travel accessibility, participants and employment of the NTE, as well as other related data such as night time pedestrian flows, crime<sup>22</sup> and health impacts<sup>23</sup> (some data can be mapped to show and monitor patterns, such as noise complaints and anti-social behaviour).
- b co-ordinate NTE management and pursue integrated action with local partners internally with transport, licensing and environmental services as well as externally including with police, health care trusts, residents, businesses and their customers. Management groups should be balanced, reflecting benefits and costs of the NTE and strategic as well as local concerns. Any action taken should be balanced and integrated with various stakeholders (see Appendix A for a checklist of partners and integrated actions).
- c consider the cumulative impact of density / high concentrations of different types of licensed premises. Policies can be included in local plans to influence the scale and nature of NTE development (use class, time of operation, size of premises and proportions of retail frontages in different NTE areas<sup>24</sup>). Any disadvantages of concentration should



be considered in the context of the economic benefits arising from the clustering of related activities.

- d manage saturation areas. Licensing-based policies can be used to address saturation (where the cumulative impact of any higher concentration of licensed premises would cause unacceptable impacts on the environmental standards or quality of life for local residents - see policy 4.6). Policies need to be considered carefully by licensing and planning authorities together and reviewed regularly to assess whether they are still necessary.
- e explore the benefits of diversifying the range of NTE activities which can include extending opening hours of existing daytime facilities such as shops, cafes, libraries and theatres). This enables a mix of activities in the public realm, attracts a wider range of visitors, including those who feel excluded from alcohol-driven entertainment activities, and decreases crime, anti-social behaviour and the fear of crime (see section 3.1).
- f improve inclusive access and safety for all NTE users, in particular for those excluded from the current offer due to disability, cultural or other reasons (see paragraph 1.2.24). Barriers to disabled people participating fully in the NTE can include inaccessible premises and venues, a lack of accessible toilets and facilities within the venue or premises, along with attitudinal and staff awareness/training issues. The freedom to participate in night time leisure and cultural activities can also be constrained by worries about personal safety. Local authorities should ensure that policies and practices take account of inclusion and access for disabled and older people, as well as particular vulnerabilities and risks that some sections of their local community may face in accessing the local NTE offer.
- g consider development of NTE 'quarters' where appropriate. NTE activities can be encouraged to develop in a specific zone or be spread more widely depending on local circumstances. In large centres the development of a NTE 'quarter' or zone can facilitate management and planning.
- h undertake realistic appraisals of the viability and roles of pubs to put their offer to communities on a sounder basis (see paragraph 1.2.19)
- i ensure NTE venues are well-served with adequate, safe and convenient night time transport including well-lit, visible and easy to find licensed minicab offices/kiosks and taxi stands with waiting areas and night bus stops. TfL is currently working on a programme which is expected to run a 24 hour Tube service on the core of the network at weekends from 2015, supplementing services already provided eg night-buses, taxis and private hire. Night time public transport needs to be coordinated between different stakeholders including NTE venues, local authority planning and transport, TfL and local minicab businesses. Particular emphasis should be placed on ensuring suitable scope and capacity for public transport to convey customers away from NTE venues at closing time. The ongoing Safer Travel at Night (STaN) initiative is a partnership between the Mayor, Transport for London (TfL), Metropolitan Police Service (MPS) and the City of London Police (CoLP), who are working together to make travelling in London

- safer at night.<sup>25</sup>
- j make the urban realm welcoming and safe for night time users including, for example, through lighting, frontages avoiding solid external shutters and passive surveillance (see also section 3.1)
- k promote excellence in the management of town centres at night, for example through the Purple Flag<sup>26</sup> accreditation scheme. Purple Flag aims to raise standards and improve the quality of towns and cities at night and will bring positive publicity for successful centres.

### Night time levy

- 1.2.16 The late night levy came into force at the end of 2012 and enables licensing authorities to raise a contribution from late-opening alcohol suppliers towards policing the night-time economy. It is a local power that licensing authorities can choose whether or not to exercise. It must cover the whole of the licensing authority's area. The licensing authority chooses the period during which the levy applies every night, between midnight and 6am, and decides what exemptions and reductions should apply from a list set out in regulations.
- 1.2.17 All licensed premises which are authorised to supply alcohol in the levy period will be affected. Premises that do not wish to operate in the levy period will be able to make a free minor variation to their licence before the levy is introduced. Licensing authorities have the discretion to offer an exemption from the levy to the following categories of premises and schemes:
- Premises with overnight accommodation
  - Theatres and cinemas
  - Bingo halls

- Community Amateur Sports Clubs ('CASCs')
- Community premises
- Country village pubs
- Business Improvement Districts (see section 5.3)

- 1.2.18 The implementation of a night levy within a Business Improvement District could mean that businesses are being asked to contribute twice for local services and this would be onerous on the businesses. It is considered that businesses in a BID should not have to contribute to a night time levy.

### Public houses

- 1.2.19 Public houses (within and beyond town centres) can be an important focus and entertainment venue for local communities. There is evidence that a number of such facilities have disappeared over the past 5 years<sup>27</sup>. The London Plan recognises that the availability of local shops and services (including public houses) is important in securing lifetime neighbourhoods (paragraph 4.48) and supports the protection and enhancement of facilities and services that meet the needs of particular groups and communities (Policy 3.1B). The NPPF (paragraph 70) supports positive planning for the provision of community facilities including public houses.
- 1.2.20 Where there is sufficient evidence of need, community asset value and viability in pub use, boroughs are encouraged to take these policies further to manage, enhance and, where justified, retain public houses and to inform development management decisions affecting them. These



policies should take into account local circumstances including:

- the continuing viability of use as a public house
- history of vacancy
- the prospect of achieving reuse at prevailing market values
- whether the pub has been marketed effectively for reuse.

1.2.21 It is acknowledged that the planning tools available are limited due to the operation of the Use Classes Order which allows conversions of pubs into shops, financial and professional services and cafes without need for planning permission. It is understood that Government recognises these concerns and is considering ways to address this matter through the Use Classes Order. In the meantime boroughs may consider the use of Article 4 Directions which can be used to remove permitted development rights in specific circumstances. Community pubs may also be identified locally as a valued community asset under the Community Right to Bid which gives communities powers to save valued community assets where they are threatened with closure.

### **Live Music Venues**

1.2.22 Live music venues can be part of the infrastructure that nurtures culture and social interaction in town centres. However, such venues can be challenged by property values, land pressures and local opposition to noise and anti-social behaviour, to the point where many small and medium-sized music venues are facing closure. The City is Built to Music<sup>28</sup> outlines some of the mechanisms that can be used to help protect and support live music venues.



1.2.23 Most decisions that affect small and medium sized music venues are taken locally. To implement London Plan policy 4.6 and in preparing local plans, boroughs are encouraged to:

- enhance and protect creative work and performance spaces and related facilities especially in areas of defined need
- balance the strategic city-wide benefits of live music venues and their value to a wider geographical set of users alongside local planning considerations
- recognise live music venues as part of a broader cultural offer which contributes to the diversity of night time uses in town centres and manage these in terms of London Plan policy 4.6Cf
- ensure that live music venues are inclusive and accessible for disabled people
- consider how new development (particularly those with residential elements) proposed near to existing live music venues should include measures to mitigate potential nuisance from venues
- consider the need for related space for rehearsals, and for making, learning about and performing music.

### **Inclusive leisure**

1.2.24 Proposals for leisure, culture and entertainment uses, including refurbishments to existing uses, should ensure that the highest standards of

accessibility and inclusion are achieved (see London Plan policy 7.2) and take into consideration age, disability, gender and cultural choices. Despite significant improvements in the accessibility of many of London’s leisure and cultural facilities in the last 10 years, disabled people are still less likely to have participated in cultural activities compared with non-disabled people<sup>29</sup>.

1.2.25 Leisure providers should:

- provide/ improve access for disabled people to facilities and services. This could include improving staff awareness training, improving physical access to premises facilities and services, and the provision of suitable accessible toilets and ‘Changing Places’ toilets (see section 1.5)
- make appropriate transport arrangements including access to black cabs and suitable kerb arrangements, upstands to taxi ranks (to allow the use of ramps) and designated disabled persons parking (see London Plan Table 6.2, Parking Addendum to Chapter 6)
- provide suitably designed, inclusive and accessible viewing areas and information
- ensure that leisure facilities are accessible and inclusive throughout, well lit and provide suitable signage and wayfinding
- maintain lifts and other facilities.

1.2.26 Case studies, best practice and further information on increasing accessibility of leisure and cultural uses can be found in Appendix G and in the draft Accessible London SPG (2014).

**Clustering of uses**

1.2.27 The London Plan supports and promotes the contribution to London’s economy made by specialist clusters of economic

activity including leisure uses. Clustering of particular uses in town centres can provide a visitor attraction, promote regeneration and boost economic growth and employment, provided it is managed effectively and does not reach saturation levels beyond which it has unacceptable negative impacts. There may, however, be occasion for regulation through the planning system, if this concentration has a significant negative impact on the objectives, policies or priorities of the London Plan such as a centre’s:

- broader vitality and viability (policy 2.15 C a)
- broader competitiveness, quality or diversity of offer (policy 2.15 C c)
- sense of place or local identity (policy 2.15 A c)
- community safety or security (policy 2.15 C f)
- role in promoting health and well-being (policy 3.2D)
- success and diversity of its broader retail sector (policy 4.8) or its potential for applying a strategic approach to transport and land use planning by reducing the scope for “linked trips” (policy 6.1).

1.2.28 If the concentration of a use has reached saturation levels where the negative impacts outweigh benefits, local authorities can set thresholds at this level of saturation (i.e. the number or proportion of permissions or units for this use within a defined area), beyond which no further permissions will be granted that will breach this threshold. Local authorities are also encouraged to work together with local stakeholders to assess and manage any negative impacts through town centre management plans

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where appropriate.

### **Betting Shops**

1.2.29 Across London there is an urgent need to enable local planning authorities to control the proliferation of betting shops and to address the implications this can have for maintaining the vitality and viability of town centres, and for protecting their amenity and safety. There is real concern that the current planning treatment of betting shops, reinforced by changes to the licensing system following the Gambling Act 2005, have prevented sensible action to address these issues.

1.2.30 There are genuine planning issues affecting amenity, community safety, diversity of uses and the continued success of town centres which justify allowing planning authorities to consider the merits of proposals for betting shops. Betting shops are different in planning terms from the other types of use in the A2 class; they have different hours of operation from other uses covered in A2 (typically they open seven days a week for up to twelve hours a day – rather longer than the typical financial/business use), with different impacts on local amenity. It is recognised that the planning system can only be used to secure land use objectives. It is also recognised that there are current limitations in the ability of boroughs to control betting shops by virtue of their A2 use classification.

1.2.31 The Mayor has called for a change in the treatment of betting shops in the Use Classes Order. Some London boroughs have considered using measures such as Supplementary Planning Documents<sup>30</sup>

or Article 4 Directions<sup>31</sup>. Boroughs also have current powers to reject applications for betting shops where there are local concerns about the impact on an area. The London borough of Newham has been at the forefront in using these powers in November 2013 when it imposed a number of license conditions on a betting shop over concerns that it attracted crime, disorder and underage gambling.

1.2.32 In April 2014 Government proposed a smaller planning use class containing betting shops which will mean that in future where it is proposed to convert a bank, building society or estate agent into a betting shop, a planning application will be required. In addition, the Government will remove the ability for other premises such as restaurants and pubs to change use to a betting shop without planning permission. All changes of use to a betting shop will therefore require planning permission in future. The Department for Communities and Local Government will consult on the detail of these proposals as part of a wider consultation on change of use in summer 2014.

### **Hot food takeaways**

1.2.33 Hot food takeaways are increasingly part of London's culinary culture and takeaway outlets contribute to economic development, provide a convenience service to local communities and create local jobs. On the other hand, consumption of fast food can have significant negative side effects on the local environment and on people's health such as risk of cardio vascular disease, obesity and type two diabetes.

1.2.34 There has recently been some concern at the clustering of hot food takeaway outlets, particularly where these concentrations have a significant negative impact on town centre vitality and viability, diversity, noise, odour, litter and community safety. Government practice guidance contains a new dedicated section stressing that health issues must be considered in local plans and decision making.

1.2.35 The GLA Food Team has developed a 'takeaway toolkit'<sup>32</sup> which contains three main recommendations for boroughs:

- (i) making food healthier** – working with takeaway businesses and the food industry to make healthier fast food
- (ii) starting them young** – schools should have strategies to reduce the amount of unhealthy food children eat at lunch and on their journey to and from school
- (iii) planning for health** – use regulatory and planning measures to address the proliferation of hot food takeaway outlets.

1.2.36 The toolkit includes an overview of the research and evidence on the impacts of hot food takeaways with guidance on how to address situations where the clustering and/or proliferation of these uses is putting the vitality and viability of centres at risk as well as research and evidence on public health impacts. A number of boroughs have already introduced innovative planning guidance which seeks to control the opening of new premises close to vulnerable populations such as school children. The GLA toolkit also highlights how boroughs can work with businesses

to make their food healthier through engagement with schemes such as the Healthier Catering Commitment which has also received support from the Food Board and the GLA Health Team.

### **Pay day loan shops**

1.2.37 Pay day loans can be accessed online or increasingly in outlets situated in high streets and shopping parades. There appears to be a correlation between the number of pay day loan outlets and the level of deprivation of an area. Growth in the number of these outlets has given rise to concerns in some parts of the capital<sup>33</sup>. Commonly, high street payday loan shops offer other services, including pawnbroker facilities or the buying/ selling of second hand goods. Starting from April 2014, Government has introduced a number of regulations to the industry around advertisements, roll over of loan payments and fees. Where planning permission for change of use is required boroughs can help to limit the growth of payday loan shops by resisting such uses where they will result in an over-concentration and where they could impact on the amenity, character, diversity and/or function of an area. However, the ability of boroughs to do so is limited as pay day loan outlets currently (June 2014) do not constitute a distinct Use Class.

### **(iii) Tourism**

1.2.38 In 2012, London attracted nearly 28 million overnight visitors, comprising 16 million from overseas and 12 million from the UK.<sup>34</sup> Tourism spending is a major contributor to London's economy and can provide an important boost to town centre employment, vitality and viability and encourage a wider range of

local facilities that can also be used by local residents.

1.2.39 To implement London Plan Policy 4.5, boroughs are encouraged to work with the tourist industry and London & Partners to identify opportunities such as accommodation, attractions and transport. Recent research<sup>35</sup> by the GLA confirms the London Plan 40,000 hotel bedroom target (Policy 4.5Ab).

1.2.40 London Plan policy 4.6 gives positive encouragement to the provision of tourist related facilities in town centres, especially in outer London and where they can contribute to regeneration and town centre renewal. Boroughs are encouraged to:

- support and promote facilities in town centres to strengthen their leisure, culture and tourism role, encourage way-finding and adopt a proactive approach to managing the negative impact of high volumes of visitors
- support facilities for business tourism to secure London's success as an international business location
- engage with stakeholders (such as town centre managers, businesses, agencies, local residents, the council and visitors) and develop a visitor management plan to capture the economic benefits of tourist activity, enhance the visitor experience and address potential negative impacts of tourism on local residents, businesses, parking, traffic or the environment.

### **Accessible hotel provision and accessibility management plans**

1.2.41 Improving the availability of hotel accommodation that is genuinely accessible to all is a particular priority in

the London Plan (policies 4.5 and 7.2). Research by Live Tourism<sup>36</sup> and Grant Thornton<sup>37</sup> confirmed that many disabled people find it difficult to find suitable and affordable hotel accommodation in London. Only around half of current demand for accessible hotel bedrooms is met, with less than 2 per cent of existing stock accessible. Demand for accessible rooms is likely to increase in the future, as barriers to access and participation reduce and as demographic trends lead to an increase in the number of disabled people.

1.2.42 All new hotel developments should help to address this shortage. Local authorities should:

- ensure that at least 10 per cent of new bedrooms are accessible and suitable for disabled people
- draw on Appendix B for guidance on accessible and inclusive hotel design and provision
- promote the highest standards of accessibility and inclusivity in all new hotel proposals (London Plan policy 7.2) and in renovations of existing stock
- ensure that suitable levels of designated disabled persons parking are provided
- include policies in their local plans that encourage applicants to submit an Accessibility Management Plan (AMP) with their planning applications (see Appendix B), to ensure that accessibility policies, practices and procedures are articulated clearly by the hotel, are in place and meet expectations.



### SPG IMPLEMENTATION 1.2 – ARTS, CULTURE, LEISURE AND THE NIGHT TIME ECONOMY

Boroughs and town centre partners are encouraged to:

- a encourage the integration of culture, creativity and good design into the built environment, having regard to those areas deficient in cultural provision and drawing on best practice across the capital
- b identify and define the special characteristics of *Strategic Cultural Areas* and support initiatives to enhance them
- c support the development of London’s *creative industries* in town centres
- d develop and promote clusters of cultural activities and related uses as *cultural quarters*, particularly to support regeneration
- e encourage and support creative performances and exhibitions in public spaces
- f manage the night time economy (NTE) reconciling economic benefits and the concerns of local residents, drawing on the SPG checklist of integrated actions
- g promote inclusive access to arts, culture, leisure and the night time economy
- h recognise and support the positive contribution that restaurants, cafes and other leisure uses can make to the town centre
- i manage over-concentrations of activities, for example betting shops, hot food takeaways and pay day loan outlets
- j take forward London Plan and NPPF policy to retain, manage and enhance public houses where

there is sufficient evidence of need, community asset value and viability in pub use and undertake realistic appraisals of the viability and roles of pubs to put their offer to communities on a sounder basis

- k enhance major clusters of visitor attractions and related infrastructure and develop visitor management plans to secure positive outcomes whilst addressing potential negative impacts arising from high visitor volumes
- l improve the availability and accessibility of visitor accommodation drawing on SPG guidance on accessible and inclusive hotel design and accessibility management plans.

### 1.3 BUSINESS AND EMPLOYMENT SPACE

1.3.1 This section of the SPG provides strategic guidance on town centres as locations for employment space<sup>38</sup>, with specific reference to offices, industrial use and emerging forms of workspace and activity.

#### (i) Offices

1.3.2 Offices can play an important role in defining a centre’s economic function as well as generating footfall and supporting vitality and viability. These office based roles are changing however, and the spatial planning process has a key part to play to manage this process so that it enhances centres’ attractiveness as business locations in response to identified occupier needs.

1.3.3 The office market beyond central London (Central Activities Zone (CAZ) and Canary Wharf/the north of the Isle

of Dogs) is subject to a complex combination of factors which, over the long term, look likely to reduce strategically significant office investment across parts of the area. London Plan policy 4.2 supports the consolidation and extension of the strengths of diverse office markets beyond central London by promoting their competitive advantages, focussing new development on viable locations with good public transport, enhancing the environment and supporting managed conversion of surplus capacity to more viable complementary uses. It is essential that the local expression of this policy is taken into account to effectively coordinate action to meet both housing and office needs.



Ealing Town Centre office quarter

this backdrop must be set strategic and local initiatives to re-invent and re-brand some town centres as attractive and competitive business locations, as well as to retain existing occupiers. In addition, account should be taken of population expansion which is likely to generate new demand for local business services requiring office space.

### Developing local policy

- 1.3.5 In developing local policies to address structural change in their office stock, boroughs are advised to:
- take a proactive approach to office development where increased economic potential can be clearly identified
  - undertake realistic appraisals of the short, medium and longer term prospects for their local office stock in light of broader strategic assessments to test the office development guidelines in London Plan Annex 2
  - focus future growth only on the most competitive locations
  - work with strategic and local partners to establish initiatives to re-invent / rebrand these locations as attractive and competitive office centres for example in terms of:
    - transport connections, quality/ convenience of interchanges
    - the quality of the local environment and public realm
    - the range, quality and distinctiveness of their town centre offer including leisure and retail
    - synergies with existing activities, such as education, health or private firms
  - consider where there are sound economic reasons to retain commercial space in town centres in the context of the NPPF paragraph 51 including evidence

- 1.3.4 Of particular importance are declining demand from historically important large scale occupiers, such as 'back offices' to serve CAZ businesses and central government or for commercial headquarters and administrative activities which sought a London - but not a central London - location. Against

of demand in local employment land reviews (see also new emerging forms of workspace and industrial capacity below) and whether the space needs to be in the town centre or adds value to the centre in terms of vitality, viability or regeneration

- monitor the impact of offices to residential permitted development (see paragraph 1.3.9)
- ensure that these management initiatives cover the retention of existing occupiers where this is viable or put in place relocation processes to sustain employment opportunities in more commercially attractive locations.

1.3.6 Local plan policies related to town centre office development and management of the existing stock (including transfer to other uses) should therefore be determined on the basis of authoritative, strategic and local evidence of:

- a current and prospective levels of economic activity
- b viability (see paragraphs 1.3.7-1.3.8 below)
- c sustained demand for office-based activities including for SMEs, start-ups, incubators and studios/workspace for creative industries
- d diversity of offer and clustering advantages
- e local transport capacity (existing or planned) and the impact of proposed improvements to public transport connectivity
- f strategic site availability and
- g townscape considerations.

### **Town centre office development and viability**

1.3.7 Overall, locally based office employment beyond central London is projected to expand substantially but its 'added value' may not be sufficient to prompt strategically significant new office development across the area – over the last economic cycle in outer London, new office development typically required a rent of more than £27 sq ft to be viable<sup>39</sup> and significantly more than local occupiers are willing to pay for the substantial quantum of reasonable quality, second hand space. The 'value added' by some new employment may however support some refurbishment of the existing stock to provide affordable business premises in viable locations<sup>40</sup>.

1.3.8 A careful local balance will have to be struck to sustain viable existing provision; enable housing-led, mixed use office re-development to consolidate and modernise part of the office stock; and to realise the significant potential increment to housing capacity represented by genuinely surplus offices (Policy 2.7 Outer London – Economy). A downturn in the office market, accelerating release of surplus office capacity, coupled with opportunities for investment in affordable homes (see London Housing Strategy) may provide particular opportunities to facilitate this process of mixed use, largely town centre based, renewal.

### **Office to residential permitted development rights**

1.3.9 In 2013 the government liberalised permitted development rights for changes of use from offices to residential but granted exemptions for

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parts of London including the Central Activities Zone, the north of the Isle of Dogs, Tech City (City Fringe), Kensington and Chelsea and the Royal Docks Enterprise Zone. In addition, a number of boroughs have brought forward Article 4 Directions for selected locations to remove the permitted development rights. The impact of the liberalisation of permitted development rights on town centres beyond the exempted areas is being monitored by the GLA in collaboration with the boroughs including impact on occupied as well as vacant office space.

### **Managing the release of surplus offices, land use swaps and credits**

- 1.3.10 London Plan policies 2.7 and 4.2Ab support the consolidation and extension of the diverse office markets in outer and inner London whilst facilitating the redevelopment of surplus office space for other uses including housing and mixed use development.
- 1.3.11 The Outer London Commission report<sup>41</sup> provides detailed suggestions on how the release of surplus office provision might be managed. Local authorities should take into account:
- evidence from integrated strategic and local studies of office demand
  - the need for some lower cost office accommodation and the scope for re-use of otherwise surplus large office space for smaller units suitable for SMEs
  - the significance of phasing the release of surplus office space to ensure adequate office capacity is maintained to sustain future economic growth<sup>42</sup>
  - the importance of an attractive business environment as part of a broader mix of uses, good environmental and public

realm quality

- a sensitive and appropriate approach to office car parking (see section 4.3)
- the potential for re-positioning and rebranding the most competitive elements of their office offer
- the impact of office to residential permitted development rights, and
- the need for converted surplus office units to be made suitable for their proposed new use (conversion to residential can pose particular challenges see section 1.4).

### **Swaps and credits**

- 1.3.12 For the release of surplus offices, local authorities can make use of land use swaps and credits<sup>43</sup> to establish a more sustainable pattern for both offices and housing and to consolidate and improve the quality of the office stock in selected viable locations. The concept of credits and swaps may be applied more widely to other land uses, for example, in a less viable location for office development, a developer may propose residential development and agree to satisfy office policy requirements for the area by making alternative office provision elsewhere in a more viable location, possibly in the form of a 'credit'.

### **Government and other public sector activity**

- 1.3.13 Some town centres with lower rent office space, especially in outer London, can be promoted as a cost-effective place for government and other public sector functions and support regeneration. New higher and further education institutions (or satellites of institutions based elsewhere) have the further benefit of developing the local labour market by helping people to improve

their skills and employability. The Mayor will support outer London boroughs in keeping under review the potential for using any relocation of Government offices from central London to support rejuvenation of the outer London economy and to achieve Government's broader objectives for such dispersal.

**(ii) Industrial capacity within and on edges of town centres**

1.3.14 Around 11 per cent of London's industrial land (which includes land for transport) is located within or on the edges of town centres.<sup>44</sup> This capacity can complement the function of the town centre for public transport, servicing and deliveries, or for small scale employment workspaces including creative industries.

1.3.15 Boroughs are encouraged to:

- consider their portfolio of industrial land (including vacant industrial sites) in the light of London Plan policy 4.4 and criteria in the Land for Industry and Transport SPG
- consider the extent to which industrial land within or on the edges of town centres supports the commercial and employment role of the town centre
- develop with TfL and other transport providers a strategy for the provision of transport infrastructure within and on edges of town centres to ensure that town centre accessibility is maintained / improved whilst safeguarding and promoting public transport operations, walking and cycling and ensuring appropriate highway access. The strategy could include identifying any surplus land in transport use within or on the edge of town centres, opportunities for mixed or joint development, consolidation or

relocation which would both support transport operations whilst also creating the opportunity for other town centre development, including residential.

- bring forward surplus industrial sites for transfer to other uses in site allocations documents in local plans.

**(iii) New emerging sectors and forms of workspace**

1.3.16 In the future, new emerging sectors (London Plan policy 4.10) may make an increasing contribution to employment in London. This includes various activities and clusters based on science, technology, media, telecommunications and creative based work, and the environmental sector. Local authorities should monitor new and emerging sectors and promote the provision of suitable workspaces to meet identified demand, including:

- standard office based, light industrial / R&D accommodation and 'hybrid'<sup>45</sup> accommodation which supports a combination of these
- flexible, small scale workspaces for business start-ups, social enterprises, SMEs, micro-firms, artists and creative uses in the form of home (or near-home) working, community and business meeting space, incubators, accelerators, co-working spaces<sup>46</sup>, studio space<sup>47</sup>, flexible 'third space'<sup>48</sup> working and local ICT "hubs" (see below).

1.3.17 Town centres, with typically good access to public transport and other facilities, are inherently suitable locations for new emerging sectors and workspaces. London's town centres are also well placed to accommodate a range of workspaces where there is demand to enable large, medium, small and micro-

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enterprises to develop and innovate. In general, SMEs benefit from good market accommodation, although in some town centres there may be constraints to provision relative to demand. Measures to address this will be for local determination in light of local supply and demand circumstances.

### INCUBATORS, ACCELERATORS AND CO-WORKING SPACES (IACS)

The GLA commissioned in 2014 a research of Incubators, Accelerators and co-working spaces (IACs). The findings indicated that IACs play an important role in the provision of work space and support to start-up and small businesses and encompass a wide range of models. The mapping exercise found IAC provision in London to be concentrated in central London, with very few spaces available outside zone 1 and 2.

Whilst the concept and operation of incubators has been active for some decades the majority of London IAC spaces have established in the last three years. IACs typically offer high levels of flexibility in relation to membership and pricing, which increase the effective 'affordability' of workspaces enabling start-up and small businesses and freelancers to access office space in London. They also generally offer business support in the form of mentoring, workshops and networking, whether as integral part of membership or as an additional extra.

Indications are that the recent rapid growth and continual evolution that are defining features of the current IAC market will continue, at least over the short term. Growth in provision is anticipated to follow

current trends – that is in close proximity to existing hubs and transport links with a focus on digital and creative sectors. However with broadening appeal IAC provision may also spread to new sectors and to different areas of London.



Matthews Yard, Croydon: Designated workspace (desks) and co-working spaces in cafe/ social spaces.



Collective Hub, 161 Camden High Street: Incubates and supports growth of high-quality start-up businesses.

#### (iv) Mixed use development with commercial

1.3.18 While encouragement of mixed use development is an important strategic principle (see Chapter 2), its application in locations which may be marginal/unviable for commercial

activity should be informed by realistic assessment of the viability of the commercial components of housing led development. It has been noted that in some of these locations blanket application of the mixed use principle has led to provision of premises which have not proved attractive to business tenants. This in turn has had environmental implications for local residents, and may have led to unjustified loss of business capacity and to sub-optimal provision of housing/affordable housing and inappropriate design. Equally, housing elements of mixed use should not undermine or preclude transport operations or servicing and delivery activities (increasingly being promoted outside peak hours). Where commercial components of mixed-use development are viable they should be realistically priced, actively marketed, appropriately sized, planned, designed and fitted out to ensure they meet the requirements of businesses looking to occupy space.<sup>49</sup>

**(v) Information and communications technology infrastructure**

1.3.19 To be competitive and support businesses, residents and visitors, town centres need to be suitably equipped with information and communications technology infrastructure. To implement London Plan policy 4.11 in the context of town centres, local authorities should consider:

- the extent of local ICT infrastructure and what they could do in partnership with public and private partners to improve this
- the need to improve connectivity to serve such centres working in partnership with other organizations such as the London

- Chamber of Commerce and Industry
- the scope of business support services to support home or near-home working by promoting new forms of infrastructure or locally based business support services (local ICT “hubs”) in town centres,
- encouraging public libraries to improve connectivity and ‘touch down’ centres with provisions for meetings (possibly provided by large, centrally based firms)
- consider the innovative use of data and technology to better integrate town centre specific systems, services and networks including in particular transport, utilities, health in line with the Mayor’s SMART London Plan<sup>50</sup>.

**SPG IMPLEMENTATION 1.3 BUSINESS AND EMPLOYMENT SPACE**

Boroughs and town centre partners are encouraged to:

- a take a realistic assessment of where growth and investment is likely to come from and plan accordingly for private, public and social enterprise activity
- b adopt a proactive approach to office development where increased economic potential can be clearly identified, focusing demand on the most viable and competitive business locations, having regard to authoritative, strategic and local evidence of sustained demand for office-based activities, viability, local transport capacity and townscape considerations
- c recognise the contribution of other types of office location beyond town centres (as indicated in the London Plan) and particularly in outer London
- d monitor the impact of office to residential permitted development

- rights in collaboration with the GLA, including the impact on occupied as well as vacant office space
- e manage the release of surplus office provision, informed by integrated strategic and local studies of office demand, taking into account the impact of office to residential permitted development, the continuing need for some lower cost accommodation and the significance of phasing in this process
- f facilitate the redevelopment of surplus office space for housing including the potential of land use swaps and credits to establish a more sustainable pattern for both offices and housing
- g promote an attractive business environment as part of a broader mix of uses, with a sensitive approach to car parking and the rebranding of the most competitive elements of outer London's office offer including its town centres
- h consider how industrial land within or on the edges of town centres supports the economic/employment role of the centre and, where surplus to requirements, how it can best promote town centre viability with a mix of uses such as housing, social infrastructure and other commercial uses
- i consider the extent to which town centres (along with outer London more generally) lack information and communications technology infrastructure and whether joint public and private sector working and effective planning can help address this
- j explore the scope and need for new forms of infrastructure or locally

- based business support services (such as local ICT 'hubs', 'touch down' centres and shared workspace) and for flexible, smaller scale workspaces for SMEs, micro-firms, social enterprise, artistic and other creative uses
- k consider the innovative use of data and technology to better integrate town centre specific systems, services and networks.

## 1.4 HOUSING

- 1.4.1 Housing plays a key role in the current life and future growth potential of London's town centres and is promoted as such in London Plan policy 2.15Aa. Housing intensification (London Plan policy 2.15Cb) in and around town centres can help accommodate London's growing population, address housing need<sup>51</sup> and generate footfall to support town centre vitality and viability. This will capitalise on the accessibility of town centres, which underpins their capacity for intensification and higher density development. Housing can also complement other town centre activities - physically in terms of utilising air space above commercial uses, functionally in terms of adding to their vitality and viability and perceptually by strengthening the 'sense of place' and quality of life which they provide for local communities.

### **Accommodating residential development in town centres**

- 1.4.2 Over the period 2008-2013 over 40,000 housing completions were accommodated within or on the edges of London's town centres. There were 16,843 net additional housing units

under construction within London's town centres at the end of March 2013 and a further 21,585 net additional units had planning permission but had 'not started'. Developments under construction or with permission and not started in edge of centre locations could yield a further 37,200 units. Housing capacity in town centres in identified allocations and 'potential' sites could yield capacity for more than 55,000 units over the period 2015/16 to 2024/25 and if edge of town centre locations are included the capacity increases to more than 97,000 units<sup>52</sup>.

- 1.4.3 The potential of town centres as locations for residential development (including the redevelopment of surplus office floorspace into dwellings) should be considered proactively in Local Plans and town centre strategies. The draft Further Alterations to the London Plan (FALP) underscore this strongly. While town centre housing can address the needs of a range of age groups and different lifestyles, including those of families, higher density development may be particularly appropriate for smaller households. This group is likely to account for nearly two thirds of London's household growth. It includes students and younger people in general, for whom the proximity of transport infrastructure and nightlife would be a key aspect of their appeal. Town centres could also be attractive to some older people for whom the range of amenities and services located close by would prove particularly helpful<sup>53</sup>. Town centre strategies should consider the need for supporting transport, social and other infrastructure (see section 1.5 and section 4) and be aligned closely with

London-wide and borough housing strategies to ensure that developments respond to the diverse needs of existing and new communities.

- 1.4.4 The Outer London Commission has explored mechanisms and approaches to accommodate higher density residential development in and around town centres. Section 2 of this SPG provides further guidance.

### **Housing from surplus offices**

- 1.4.5 London Plan Policies 2.7 and 4.2Ab support the planned redevelopment of surplus office space (see section 1.3) for other uses including housing. In the three years to 2012, changes from office to residential use have on average produced almost 4,000 completed units per annum across London<sup>54</sup>. Research<sup>55</sup> also highlights that, on average, the residential unit gains arising from planned redevelopment of surplus offices over the last three years has been around three times greater than for simple conversions of offices to residential. Planned redevelopment can also deliver a higher standard of new accommodation, improved residential amenity and design quality. Boroughs and other partners are encouraged to take this into account when considering potential new housing capacity from this source.

### **Town centre housing and density**

- 1.4.6 As the main nodes on London's public transport network, Metropolitan, Major and some District centres typically have higher 'PTAL' scores (5-6) and also more sustainable travel patterns, capable of sustaining housing densities up to 405 units per hectare depending on dwelling

## CASE STUDY – KING’S MALL CAR PARK, HAMMERSMITH<sup>56</sup>



The King's Mall scheme in Hammersmith town centre will see St George West London re-develop office buildings and a car park to provide a mixed-use development comprising over 400 residential units, over 500 square metres of commercial floorspace, replacement car parking and amenity space. The scheme demonstrates the potential to accommodate housing growth in town centres through intensification.

size (London Plan policy 3.4). At these higher densities town centres can be particularly important in meeting the need for smaller households. The Outer London Commission<sup>57</sup> reports that town centres can accommodate families but this will require adequate social and environmental infrastructure with a consequent reduction in development capacity. Opportunities for play and other amenity spaces tend to be more constrained in town centres so a lower proportion of family homes may be appropriate in these locations. There may be greater scope to encourage family-sized housing around the edges of existing centres in the interface with the surrounding hinterland.

1.4.7 A combination of smaller homes and good public transport accessibility

provides significant scope to minimise car parking provision, including through promotion of 'car-lite' or car free development, helping increase housing capacity (Policy 6.13) and enabling in some locations more viable development. Higher densities also enhance the viability of car sharing schemes and make the most of accessible town centre locations.

- 1.4.8 The application of the London Plan housing density matrix (policy 3.4) should enable boroughs to enhance housing capacity through higher density development in and around town centres. For general strategic planning purposes, Transport for London calculates the distance between the town centre and its catchment in terms of travel time, adding up the following elements:
- Walk from home to public transport access point (bus stop / station)
  - Wait time
  - Travel time (including interchange / wait if applicable)
  - Walk from station / bus stop to town centre (the town centre is represented not by a particular land mark but by whatever counts as the key trip attractor in the individual town centre, so for example the primary retail frontage).
- 1.4.9 For more local application (for example development management or preparation of local plans) account should be taken of the circumstances of the development. The prime consideration should be reasonable walking distance approximating to 800m, which is usually taken to be 10 minutes walking time. This will enable translation of a rigid 800m to a real



time/distance, in light of the local street pattern rather than rigid translation of 'as the crow flies' distance.

- 1.4.10 The point of measurement will also depend on local circumstances. In some it may be the centroid of the town centre, in others the centroid of the primary frontage (or another point which reflects the economic 'centre of gravity' of the frontage's attractions, possibly measured by rental value), and in others the main transport hub.

### **Government liberalisation of permitted development rights**

- 1.4.11 In 2013 the Government introduced a wide ranging package of deregulation of national planning rules affecting new development and changes of use of premises including permitted development rights to change use of buildings from offices to residential use (see section 1.3 of this SPG).
- 1.4.12 In 2014 Government brought forward amendments to the GPDO to allow flexibilities to support changes of use between retail uses to new homes<sup>58</sup>. The Mayor is concerned that this proposal for unmanaged, incremental release of shop units to low density housing is likely to cut across the approach to more comprehensive, managed redevelopment proposed by the Outer London Commission<sup>59</sup> and draft FALP to deliver substantial, high density, high quality residential or retail-led mixed-use redevelopment in larger centres (Metropolitans and some Majors); consolidation of retail frontages through residential led mixed use development in smaller centres (some Majors, and more Districts); and ensuring the availability

of viable convenience retail and service functions in Neighbourhood and more local centres.

- 1.4.13 Boroughs are encouraged to take into account the impact of prior approval proposals on the potential for a co-ordinated approach to housing intensification in town centres (London Plan policy 2.15Cb), having regard to the approaches advanced by the Mayor's Outer London Commission and proposed in FALP (see also paragraphs 1.1.15-1.1.17 and section 2 of this SPG).

### **Barriers to Delivery Taskforce**

- 1.4.14 The Mayor is concerned to extend and realise the contribution that town centres make to housing provision in London and that planning approvals there translate into housing completions. Research<sup>60</sup> suggests that 45% of permitted housing capacity is controlled by agencies unlikely to build out those permissions. The Mayor is working with Government, boroughs and others to address this. There is also concern that even when housing is developed market absorption rates can be low and to accelerate delivery of housing there is a need to encourage and engage with partners who are likely to build out in the shorter term including affordable housing providers, and investors in the private rented sector and specialist provision including for students and older people.

## SPG IMPLEMENTATION 1.4 HOUSING

Boroughs and town centre partners are encouraged to:

- a draw on London Plan policy 2.15Cb to support the intensification of town centres, including housing and mixed use development
- b capitalise on town centres inherent public transport accessibility and lower levels of car dependency for higher density housing in line with London Plan policy 3.4
- c consider the scope to redevelop surplus office space for new residential accommodation in town centres
- d recognise that centres are probably more appropriate for smaller households, students and older Londoners' housing and being realistic over the trade-offs in providing limited family housing there
- e ensure that strategies for town centres are aligned closely with London-wide and borough housing strategies to ensure that future developments within and on the edges of town centres respond to the needs of diverse range of existing and new communities
- f take into account the impact of office to residential and retail to residential permitted development on the potential for a co-ordinated approach to housing intensification in town centres.

## 1.5 SOCIAL INFRASTRUCTURE, CIVIC AND COMMUNITY SERVICES

1.5.1 Town centres, by virtue of their current or potential accessibility by walking,

cycling and public transport, can play an important role in providing convenient, inclusive and sustainable access to several types of social infrastructure<sup>61</sup> for residents, workers and visitors. New or improved social infrastructure can act as a catalyst for town centre regeneration, support a step change in the delivery of housing and increase footfall for other activities, including retail.

1.5.2 Specific types of social infrastructure that are encouraged in town centres include:

- a **Health facilities** (London Plan policy 3.17) - partnerships with service providers including the NHS and other health service providers will be crucial to support service delivery and structural change in town centres.
- b **Education and training centres** (London Plan policy 3.18 and 4.12) - recognising the particular requirements of the education sector and the importance of accessibility, town centres can be suitable locations for these facilities
- c **Libraries** – the refurbishment of Enfield Town Library (see case study below) is a good example of how investment in a library can encourage greater use of a town centre by all sections of the community
- d **Public services** such as council offices, including one-stop shop services
- e **Post offices** – important component in meeting need for local services (London Plan paragraph 4.48)
- f **Public toilets** - including provision which is inclusive and accessible for the whole community, including older people, disabled people and parents with babies or young children. Stakeholders should:

- take steps to encourage the establishment of public toilets in new town centre developments and encourage businesses located in new developments to make their toilets available to the general public<sup>62</sup>
- provide separate accessible baby changing facilities and ‘Changing Places’ toilets in addition to accessible toilets in all town centre locations to ensure accessibility for the whole community.<sup>63</sup> Detailed guidance on the provision of public toilets is provided in section 3.7 of the draft Accessible London SPG

g **Police shop units and community safety facilities** - The Metropolitan Police Service has a requirement for police shop units within town centres. These front office functions should provide an accessible, inclusive and visible police presence in the high street. Local authorities should:

- envisage a number of these in each borough. The floorspace requirements will vary and be considered on a case-by-case basis to reflect operational policing requirements and the Local Policing Model for the borough

- facilitate the location of units within key retail frontages or community buildings such as libraries, depending on local circumstances
- h **Other social infrastructure** relevant to town centres including community facilities, nurseries, crèches, play, recreation facilities, swimming pools, gyms, sports centres, places of worship and open space
- i **Civic facilities** including local authority town halls and departments, as well as community and cultural uses such as museums, exhibition spaces and performing arts venues.

**SPG IMPLEMENTATION 1.5 SOCIAL INFRASTRUCTURE, CIVIC AND COMMUNITY SERVICES**

Boroughs and town centre partners are encouraged to:

- a consider the potential to relocate social infrastructure and public facilities to town centres as opportunities arise
- b support the multiple use of premises/ co-location of social infrastructure, civic and community services with commercial facilities to reduce management and maintenance

**CASE STUDY – Enfield Library**



Enfield won the 2010-11 Mayor's Planning Award for "Best Built Project" for the extension, refurbishment and remodelling an existing Edwardian library building inside the town centre conservation area of Enfield Town. The aim of the project was for the building to resemble a bookshop rather than a traditional library, increase integration with the rest of the town centre, and to attract greater use from wider sections of the community.

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- costs, improve the quality of service and offer visitors a wider range of choice and services (e.g. post office functions in retail outlets)
- c resist loss of infrastructure and maximise the usage of existing facilities
  - d identify locations, sites or buildings, and financial contributions for new provisions including as part of mixed use development with housing
  - e identify alternative community uses (where needs have been identified) when facilities are no longer needed in their existing use.
  - f consider improvement to social infrastructure as a catalyst for town centre regeneration
  - g have regard to guidance on how to carry out social infrastructure needs assessments in the Mayor's draft Social Infrastructure SPG and Housing SPG.

## ENDNOTES

<sup>1</sup> Experian Business Strategies, Consumer Expenditure and Comparison Goods Floorspace Need in London, GLA, 2013

<sup>2</sup> Source: GLA Economics, 2013.

<sup>3</sup> Experian Business Strategies, 2013 op cit; Mayor of London, 2013 London Town Centre Health Check. GLA, 2014; The Grimsey Review: An Alternative Future for the High Street, 2013; London Assembly Planning Committee, The Future of London's town centres, GLA, 2013. Beyond Retail. Redefining the shape and purpose of town centres. BCSC taskforce, Nov 2013.

<sup>4</sup> Experian Business Strategies, 2013 op cit

<sup>5</sup> For definitions see Glossary (Appendix F)

<sup>6</sup> For definitions see Glossary (Appendix F)

<sup>7</sup> Source: ONS/Experian

<sup>8</sup> Experian Business Strategies, 2013 op cit uses a central forecast of 21% share for non-store comparison goods sales by 2021 or 17% when adjusted for SFT sales from stores; Centre for Retail Research cites a share of 21.5 % by 2018.

<sup>9</sup> Beyond Retail Nov 2013 op cit / Javelin Group, Transforming the Retail Enterprise, May 2013.

<sup>10</sup> Mayor of London. The Outer London Commission. Third Report. GLA, 2014

<sup>11</sup> Experian Business Strategies, 2013 op cit

<sup>12</sup> Mayor of London. The Outer London Commission. Third Report. GLA, 2014

<sup>13</sup> 'Gross' need refers to the total floorspace requirement, independent of existing vacant floorspace. 'Net' need is the requirement after factoring in existing vacant floorspace.

<sup>14</sup> Statutory Instrument 2014 No.564 The Town and Country Planning (General Permitted Development)(Amendment and Consequential Provisions)(England) Order 2014

<sup>15</sup> Outer London Commission. Third Report, GLA, 2014 op cit

<sup>16</sup> <https://www.london.gov.uk/priorities/arts-culture/promoting-arts-culture/culture-on-the-high-street>

<sup>17</sup> Outer London Commission, The Mayor's Outer London Commission Report, June 2010,

Mayor of London

<sup>18</sup> Mayor of London. Cultural Metropolis. Achievements and Next Steps. GLA, 2014 (pages 88-91)

<sup>19</sup> For more information contact Audiences London – [www.audienceslondon.org](http://www.audienceslondon.org)

<sup>20</sup> Leisure covers a diverse range of activities including, but not exclusively, cinemas, cafes, restaurants, pubs and bars, takeaways, night-clubs, health and fitness centres, theatres, indoor bowling centres and bingo halls.

<sup>21</sup> Experian Business Strategies, 2013 op cit

<sup>22</sup> For example through Local Crime and Disorder Reduction Partnerships (CDRP)

<sup>23</sup> For example from local A&E or through Local Health Observatory ([www.lho.org.uk](http://www.lho.org.uk)) for local alcohol indicators and other health related data.

<sup>24</sup> The London Borough of Camden's Revised Planning Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses, adopted 4 October 2007, provides a good example of an approach taken to the management of these issues.

<sup>25</sup> STaN aims to reduce the number of cab-related sexual offences by raising awareness of the dangers of using unbooked minicabs, also known as touts and illegal cabs, and by using targeted police and enforcement activity to identify, disrupt and deter illegal cab activity.

<sup>26</sup> [https://www.atcm.org/programmes/purple\\_flag/WelcometoPurpleFlag](https://www.atcm.org/programmes/purple_flag/WelcometoPurpleFlag)

<sup>27</sup> Steve O'Connell. GLA Conservatives. Keeping Local. How to save London's pubs as community resources. 2013. CAMRA Capital Pubcheck, Update 228. January 2013; Mayor of London. 2013 London Town Centre Health

Check, GLA 2014.

<sup>28</sup> Mayor of London. The city is built to music. Small to medium sized music venues in the capital, GLA, March 2008

<sup>29</sup> ODI Disability Equality Indicators (DCMS) 2010

<sup>30</sup> See Barking and Dagenham SPD: Evening the odds: curbing the proliferation of betting offices, 2013

<sup>31</sup> Southwark Council approved two Article 4 directions removing development rights for certain businesses to convert into betting shops, pawnbrokers and payday loan shops without planning permission

<sup>32</sup> Takeaways Toolkit. A London Food Board & Chartered Institute of Environmental Health Publication Based on a consultancy report by Food Matters, November 2012

<sup>33</sup> London Assembly Economy Committee: Open for Business. Empty shops on London's high streets GLA, March 2013 and Draft Town Centres SPG consultation responses

<sup>34</sup> Source: International Passenger Survey (IPS) and Great Britain Tourism Survey (GBTS). Both figures include business visitors.

<sup>35</sup> GLA Economics, Understanding the demand for and supply of visitor accommodation in London to 2036, GLA 2013

<sup>36</sup> Live Tourism Is London Ready to Welcome Disabled Visitors? LDA, Jan 2010

<sup>37</sup> Grant Thornton 2010 op cit

<sup>38</sup> See also Mayor's Economic Development Strategy

<sup>39</sup> Outer London Commission 2010 para 3.20

<sup>40</sup> Kingston University, Ramidus Consulting.

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Understanding the Future of South London. Discussion Paper for OLC 27.9.11. SLP, 2011

<sup>41</sup> Mayor of London, 2010 op cit

<sup>42</sup> South London Partnership, Discussion Paper for the OLC Meeting 27th September 2011, Understanding the future of South London, September 2011

<sup>43</sup> See Glossary for definitions

<sup>44</sup> Source: GLA analysis of URS (2010) London Industrial Land Baseline

<sup>45</sup> Ramidus Consulting, Roger Tym & Partners, London Office Policy Review 2012. GLA, 2012

<sup>46</sup> Mayor of London, URS and Gort Scott. Places of Work Incubators, Accelerators, Co-working. GLA, 2014 (forthcoming);

<sup>47</sup> Mayor of London. Culture Team, Artist Studios

<sup>48</sup> Spaces that are neither the office nor home, such as libraries, cafes or business centres – see London Assembly. The Future of London's Town Centres. GLA, May 2013

<sup>49</sup> Mayor of London. Accommodating Growth in Town Centres. GLA, 2014

<sup>50</sup> <http://www.london.gov.uk/priorities/business-economy/vision-and-strategy/smart-london/smart-london-vision>

<sup>51</sup> See Mayor's Housing Strategy and Housing Supplementary Planning Guidance

<sup>52</sup> Mayor of London. 2013 London Town Centre Health Check Analysis Report. GLA, 2014

<sup>53</sup> Cambridge University, Three Dragons, Land Use Consultants. The role of the planning system in delivering housing choice for older Londoners. Final report for the GLA. GLA, 2012

<sup>54</sup> Ramidus Consulting, Roger Tym & Partners. London Office Policy Review 2012. GLA, 2012

<sup>55</sup> Ramidus Consulting, Roger Tym & Partners. 2012 op cit

<sup>56</sup> Photo courtesy of St George West London

<sup>57</sup> Outer London Commission. Second Report. GLA, 2012

<sup>58</sup> Statutory Instrument 2014 No.564 The Town and Country Planning (General Permitted Development)(Amendment and Consequential Provisions)(England) Order 2014

<sup>59</sup> Mayor of London. Outer London Commission – Third Report, GLA 2014

<sup>60</sup> See Mayor of London. 'Barriers to housing delivery. What are the market-perceived barriers to residential development in London?' GLA, 2012

<sup>61</sup> See London Plan Policy 3.16. For more general guidance on social infrastructure, refer to Mayor of London. Housing Supplementary Planning Guidance and Mayor of London. Social Infrastructure Supplementary Planning Guidance

<sup>62</sup> including through borough-led community toilet schemes such as the Mayor's Open London toilet scheme. This scheme involves opening existing toilet facilities to the public, free of charge, in commercial premises such as retail outlets or in public buildings

<sup>63</sup> A 'Changing Places' toilet is a toilet for assisted use which has enough space and the right equipment to enable use by people with profound and multiple disabilities and their carers who cannot use standard wheelchair accessible toilets See <http://www.changing-places.org>

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## 2. DELIVERING MIXED USE HOUSING INTENSIFICATION

2.0.1 Outside central London, town centres are among the most accessible locations by public transport. As such they can support high trip generating uses at higher densities subject to capacity, than areas with lower public transport accessibility. To implement London Plan policy 2.15Cb, boroughs and town centre partners are encouraged to investigate the scope for mixed use intensification including for higher density residential development<sup>1</sup> and develop proactive strategies to realise

this potential including any necessary transport improvements.

2.0.2 The Outer London Commission has commissioned work<sup>2</sup> to look at the viability, mechanisms and design approaches to support housing-led mixed use redevelopment and intensification in town centres. This work will also inform the examination in public of London Plan further alterations on this matter.

2.0.3 Criteria to consider in assessing the potential for intensification in town centres include:

- Existing and potential level of density of development and activity
- Public transport accessibility and capacity
- Planned Transport improvements – to

### CASE STUDY – STRATFORD<sup>3</sup>

Stratford and the Olympic Park will be at the heart of a new mixed use urban district in east London, comprising the capital's most important regeneration project for at least two generations. Alongside the Westfield Stratford shopping centre (which employs 10,000 people, over 2,000 of them previously unemployed local residents), will be 10,000 homes. iCity's leading technology and digital cluster, Here East, will provide 5,300 jobs. The Olympicopolis project will create a major new higher education and cultural district that will potentially see two world class institutions – University College London and Victoria and Albert Museum build new sites adjacent to Stratford waterfront.



- indicate future capacity for intensification
- Relationship with wider regeneration initiatives
- Retail and other commercial rents – both levels and change to indicate the demand for the retail offer
- Vacant floorspace – as a further measure of demand and also of under-utilisation of the existing centre.

## 2.1 PROACTIVE MECHANISMS FOR TOWN CENTRE INTENSIFICATION

### Town Centre Strategies

- 2.1.1 Implementation of London Plan policy to secure the housing potential of town centres through mixed use intensification should support a strategic and co-ordinated approach to development and regeneration, rather than piecemeal incremental changes of use from ground floor retail to residential.
- 2.1.2 London Plan policy 4.7A supports a strong partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres. These assessments should be carried out in conjunction with assessments of potential new housing capacity in town centres and identify opportunities for intensification and mixed use redevelopment, including the following large-scale single ownership opportunities:
- Brownfield land or surface car parking, which can improve the urban environment, and incorporate new parking into the new scheme
  - Building above and re-providing or renovating social infrastructure, which

- can be stacked beneath residential, and potentially alongside or on top of other uses such as retail
- On top of large-scale retail such as supermarkets or shopping centres, which provide an opportunity for residential to be located above in potentially high volumes, particularly when they are designed as part of new schemes
- On top of small-scale retail, where new residential can be stacked with car parking integrated into the design
- Redevelopment of office buildings and associated land, which are often large and offer scope for high density residential. Change of use from office to residential may not provide the optimal physical solution or housing density
- On top of other large-scale uses, such as bus garages.

- 2.1.3 Forthcoming Outer London Commission research (Accommodating Growth in Town Centres) will provide examples of how this approach might be applied to town centres including high level viability appraisals. The research has identified a range of proactive mechanisms to support town centre intensification which can include:

### Site assembly and marketing

- 2.1.4 Under the NPPF, boroughs and local town centre partnerships must engage in positive planning for the future of their town centres. This includes active steps to assemble and market sites to prospective development partners and occupiers. By engaging town centre land owners in local partnerships and developing shared objectives, the process of assembling fragmented sites to deliver town centre schemes can help reduce risk in delivering town centre projects.

### Compulsory Purchase Orders (CPO)

- 2.1.5 Fragmented ownerships can be a constraint on the adaptation and intensification of town centres. Local authorities can use CPO powers as a development tool to assemble sites, facilitate redevelopment and sustain town centre regeneration through strategic acquisitions of parts of their town centres. Joint approaches in negotiating with property owners and establishing clear valuations as the base line for those negotiations is an essential part of the CPO process, as is being realistic and managing expectations around the likely timescales for delivery. CPOs can also be used as a precursor to public-private joint ventures.

### Publicly owned land

- 2.1.6 Land within public ownership can be a useful resource in delivering town centre projects. The GLA, Transport for London, boroughs and other public bodies should consider how their land holdings can best support town centre intensification and regeneration.

### Town Centre Investment Models

- 2.1.7 Delivering intensification, including mixed use development and housing can be supported through new models or mechanisms for town centre investment, housing delivery and ongoing asset management. Examples of potential mechanisms are set out below.

### Private Rented Sector (PRS)

- 2.1.8 The Mayor's Housing Strategy highlights that there is capacity currently still largely untapped for long term private finance to move into residential development, especially for new, high quality private rented homes which could help accelerate the building out of large sites including those in town centres.

### CASE STUDY – DICKENS YARD, EALING

Example of mixed use intensification including residential in Ealing town centre. The scheme involved widespread consultation with local stakeholders and there was continuity in the development process and cross-party support. LB Ealing showed strong leadership, initiating the CPO process to assemble sites. The scheme also demonstrates the potential for meeting wider ambitions around town centre regeneration, while helping to meet the housing needs of older people.





2.1.9 PRS offers a flexible form of tenure and can meet a range of housing needs. Substantial institutional investment in private rented housing could provide a new source of funding for the housing sector, speed up delivery and increase choice of available accommodation<sup>4</sup>. Development of institutional PRS homes could be particularly relevant for town centre intensification as mixed use developments can be held in single ownership over time, allowing investors the flexibility to better manage the commercial elements.

### **Direct Funding**

2.1.10 This model involves the direct provision of new local authority housing to deliver additions to annual housing stock and drive programmes to realise capacity for affordable housing. The Mayor's Housing Strategy supports the removal or revision of boroughs' debt caps which could generate funds for a significant increase in council house building and help deliver complex regeneration projects and stock improvement programmes. The revised Right to Buy scheme, with its larger discounts, should also increase the amount of capital available to boroughs to invest in new supply. If this was coupled with relaxation of borrowing caps, there could be a considerable increase in housing delivery within and around town centres.

### **Housing Zones**

2.1.11 The Mayor wants to accelerate housing delivery in areas with a particularly high development potential<sup>5</sup>. These will be designated Housing Zones. All Housing Zones will be underpinned by a shared delivery framework to hold partners accountable for the numbers of homes

delivered. This will be a simple plan listing the sites in the relevant zone, the number of homes each could deliver, what the blockages are to delivery, what interventions might therefore be appropriate, and in what timeframe delivery could be achieved. This tightly-focused approach on delivery and specific policy interventions and outcomes, combined with a relatively small geographic area of focus, is a key distinguishing feature of a Housing Zone compared to an Opportunity Area.

2.1.12 The Mayor, working in concert with boroughs, will establish a bespoke set of local policies in each Housing Zone, and will align both its own, the boroughs' and other partners' resources to optimise output. This may involve investigating the case for targeted tax incentives, in a similar way to enterprise zones, lighter touch planning and effective land assembly, including, where necessary, the use of compulsory purchase powers. The Mayor will work closely with boroughs to identify the zones, and will publish a prospectus in 2014.

### **Real Estate Investment Trusts (REITs)**

2.1.13 REITs are property companies that allow investors to pool their investments with the associated risks and rewards, without the need to own or develop the properties individually. They can be used to bring various property interests under the ownership of a single asset management entity. This may be achieved by property owners voluntarily or through the use of a CPO and joint venture. Property is purchased or exchanged for bonds secured against the REIT. The investor partner can raise share capital to fund investment/

refurbishment and rental income from the assets can be used to cover operational costs. REITs have a potential role in increasing the availability of finance to fund residential development for rent (both public and private).

### **Local Asset Backed Vehicles**

2.1.14 Local Asset Backed Vehicles (LABV) enable the partnership of public and private sector organisations in regeneration schemes. In a simple model, the public sector body creates a Special Purpose Vehicle (SPV) with a private sector partner. The public body transfers land to this partner at market value which is then matched by the private partner with at least an equivalent amount of investment capital. These investments form the equity of the SPV. The private partner undertakes the development and the public sector partner receives a share of profits in return for its land investment. Whilst LABVs allow for risks to be shared, they are subject private sector investment funding criteria and can be expensive and time consuming to establish (needing to satisfy OJEU procurement rules). LABVs could be considered for town centre intensification where a public body has a significant land ownership.

### **Business rates retention**

2.1.15 The Mayor supports the need to bring forward proposals for the retention of business rates and to use the receipts for local regeneration including town centres (an issue raised in the Mary Portas Review). The Mayor will continue to work with boroughs and other stakeholders to secure local retention of business rates within the capital and to

support their use to rejuvenate London's town centres.

### **Joint ventures**

2.1.16 Joint ventures describe a range of different commercial arrangements between two or more separate entities. The parties involved may share their resources, expertise, land, capital, market knowledge, talent, enthusiasm and commitment. This approach could be considered to help solve problems and deliver viable development and sustainable results in town centres. Guidance relating mainly to public and private sector joint ventures is set out by HM Treasury<sup>6</sup>. The Government is also proposing incentives for residential development and the potential for joint ventures with the private sector to help stimulate both commercial investment and housing in London's town centres.<sup>7</sup>

### **Tax Increment Financing**

2.1.17 Tax Increment Financing (TIF) is a model that may be used to enable the funding of town centre development and infrastructure, including housing and community regeneration projects. TIFs would allow local authorities to borrow against future revenue increases for infrastructure development purposes, based on a projected expansion in their business rate base.<sup>8</sup> TIFs may have a role to play when large infrastructure investment is required to facilitate town centre redevelopment and intensification. TIFs may also help unlock town centre schemes which have stalled.

### SPG IMPLEMENTATION 2.1 PROACTIVE MECHANISMS FOR TOWN CENTRE INTENSIFICATION

Boroughs and town centre partners are encouraged to:

- a support proactive land assembly including use of the CPO process
- b consider new models or mechanisms for town centre investment, housing delivery and ongoing asset management such as PRS, Direct Funding, Housing Zones, REITs, Local Asset Backed Vehicles, Joint Ventures and TIFs.

## 2.2 DESIGNING SUCCESSFUL HIGH DENSITY HOUSING INTENSIFICATION

2.2.1 In addition to the OLC work<sup>9</sup>, a range of partners including boroughs have explored how well designed development can increase housing capacity in and around medium sized and smaller town centres<sup>10</sup>. These studies outline design and development principles to secure high quality, high density development as well as providing ways to balance the need for homes of different sizes. The Outer London Commission extended this work by commissioning illustrations of best practice in the design of development of appropriate densities in different types of location including town centres.<sup>11</sup>

2.2.2 Reconciling the competing needs of different town centre activities requires sensitive and imaginative planning and design to ensure that housing contributes to place making and nurtures the character of the town centre through contextually sympathetic development,

as well as addressing specific residential issues such as access, inclusive design, security/safety and night-time noise. Town centre strategies that establish a clear and effective vision will be an important tool in creating the right conditions for achieving this. Mixed use town centres providing a range of facilities and uses in addition to residential are encouraged.

2.2.3 Town centre development should:

- take into account the role, function and accessibility of the town centre and its potential for intensification (London Plan policy 2.15Cb) when considering matters such as scale, proportions, massing, building lines, heights and widths
- should not dismantle the existing community, and contribute to the development of lifetime neighbourhoods (policy 7.1)
- make a positive contribution to the identity, character and distinctiveness of the centre and respond positively to local context (policy 7.4)
- promote the highest standards of architecture (policy 7.6) which support innovation in design to respond to modern town centre requirements; promote a positive relationship with street level activity; and contribute to the character and identity of the town centre
- recognise the positive contribution of heritage assets (or the contemporary reinterpretation of historic details) to sustain the economic viability and heritage significance of a town centre, reinforcing a sense of identity (policies 7.8 and 7.9)
- take into account guidance in the Mayor's Housing SPG on housing standards (and best practice) which developers should meet in higher density developments.



Residential entrance located adjacent to retail units  
– Dalston Square

### Active Frontages

2.2.4 Active frontages should be maximised wherever development faces publicly accessible space. Active frontages are defined as development frontage on the ground floor where inhabited uses are located, with a visually permeable elevation and a generous distribution of entrances. The level of activity generated can vary depending on the design of the elevation and the use of the building. For example, small scale retail uses are more active than office or residential uses, but residential uses can achieve a degree of activity by providing a good distribution of entrances and generous fenestration. Uses such as cafes and restaurants may further activate the public realm by using the public space in front of the building.

2.2.5 Where active frontages are not possible, inactive uses should be carefully interspersed amongst active uses and be carefully located to minimise their overall impact on the public realm. Long contiguous stretches of inactive frontages will undermine the vibrancy and vitality of the town centre and

create areas that are likely to attract anti-social behaviour and should be avoided.



Narrow retail unit located to wrap otherwise inactive frontage - Broadgate Tower

### Tall and large buildings

2.2.6 London Plan policy 7.7 identifies town centres as locations that may be appropriate for tall buildings. Many town centres also have more detailed DPDs identifying specific locations within town centres where tall buildings are suitable. In preparing DPD's local authorities should also assess the impact of large scale developments on permeability, sunlight, wind, legibility and density. Many tall building applications are subject to environmental impact assessment or a form of environmental statement through which these issues should also be thoroughly examined.

2.2.7 To accommodate growth and new development in town centres, developers, architects and landowners are encouraged to demonstrate flexibility in the scale, format and orientation of development and make efficient use of land including existing surface car parking areas. This might entail

innovations in layout, mix of uses, stacking of uses, smaller development footprints, reduced amounts and reconfiguration of car parking and more efficient servicing arrangements.

### **Integrating housing and large-scale retail**

- 2.2.8 Integrating housing and large-scale retail development into town centres presents a number of challenges, but if well designed can significantly contribute to the vibrancy and vitality of the town centre. Policies in London Plan Chapter 7 and guidance in this SPG set out important considerations when developing such schemes.
- 2.2.9 Large-scale retail units located at ground level should be wrapped with active uses such as self-contained residential units, entrances to residential cores and small commercial units to avoid large extents of blank frontage.
- 2.2.10 Apartment blocks above retail units should each have their own core accessed directly from street level. This

will create simple and legible entrances to residential units and help animate the public realm at street level. Entrance arrangements that involve negotiating multiple cores and thresholds should be avoided.

### **Integrating small scale non-residential uses and housing**

- 2.2.11 The design of residential uses above small non-residential units should take account of the requirements of a wide variety of commercial occupiers, and should provide ducting for flues and other servicing arrangements that will allow these units to easily change use. Water, drainage and other services associated with the residential uses above should also be carefully located so maintenance and access does not conflict with the use of non-residential occupiers below.
- 2.2.12 Access to residential uses above should be carefully mediated and avoid unduly compromising the non-residential uses. Residential areas and entrances should be clearly recognisable as such.

### **CASE STUDY – CANADA WATER<sup>12</sup>**

Canada Water is an example of existing ground floor large-scale retail rebuilt and wrapped with residential, with car parking below and residential above. Display frontage of the retail space is used to create active frontage along the central street. The retail space is serviced through an internal loading bay. Residential bin stores are next to the residential lobbies and are serviced from the street, but with minimal frontage exposed. Bike storage is at basement, ground, and first floor levels. Parking for the retail is at basement level. All cores are separately accessible at ground level from smaller lobbies.



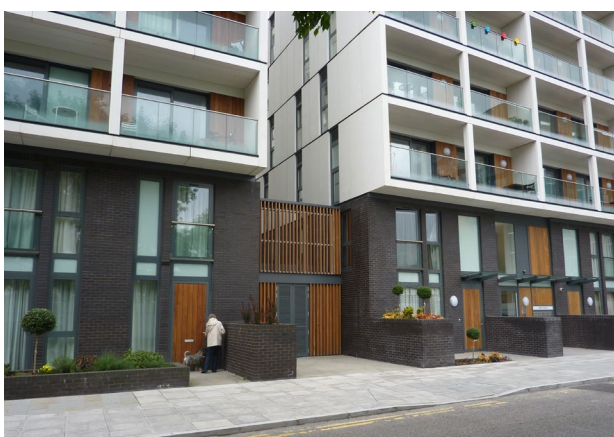




Royal Victoria, Newham

### Servicing and Refuse

2.2.13 Servicing of commercial units should be done from the street where possible and should be minimised and managed to reduce the negative impact on the town centres whilst maintaining efficient and workable servicing strategies for businesses to operate. In order to reduce congestion and improve safety, out of hours servicing and deliveries should be considered where possible.



Refuse and cycle storage interspersed amongst more active frontage – Dalston Square

2.2.14 Where servicing is done on plot, servicing yards need to be wrapped in active uses to keep them away from the public realm and minimise the amount of inactive frontage. Entrances to service yards need to be designed to be as compact as possible to reduce their impact on the streetscape.

2.2.15 Refuse storage should be located away from the public realm, but be easily accessible for collection, with sufficient ventilation. Residential refuse storage should be designed in to be stored in separate compartments corresponding to individual circulation cores.

### Car Parks

2.2.16 Development should make satisfactory arrangements for car parking (London Plan policy 6.13) whilst taking steps to reduce car dependency. Surface car parking should be avoided to make efficient use of land. On-street, basement, courtyard, and upper floor car parking are all suitable options, but should have strategies to deal with residential and retail users. Car parking on upper floors can provide scope to transfer residential service ducts to avoid conflicts with retail.

2.2.17 Where large car parks are provided at ground level they should be wrapped with development to keep them away from the public realm, minimise the amount of inactive frontage and be well secured.

2.2.18 Car parks can be provided on upper levels as this does not impact excessively on the quality and vibrancy of the public realm. However, this needs to be carefully designed to create attractive

elevations. This approach may also provide benefits in separating water, drainage and other mechanical and electrical services ducting between vertically stacked uses.

### **Bicycle Parking**

Bicycle storage in mixed use developments should be secure, attractive to use and be easily accessible however, they need to be located away from the public realm to avoid creating long stretches of inactive frontage. Residential bike storage for residential uses should be located in small clusters near circulation cores and accessed discreetly from the street or foyer.

On-street cycle parking should also be provided to cater for customers and visitors of town centre attractions. This parking requires less security and should be focused on convenience and ease of use. All cycle parking should be consistent with the London Cycle Design Standards (or subsequent revisions).

### **Integrating Housing with Social Infrastructure and Schools**

2.2.19 Social infrastructure such as libraries, health facilities, and leisure centres in town centres should be can be stacked and mixed with other uses to optimise the use of the site.

2.2.20 School play areas can be provided on roof terraces or as play decks. They may be covered or open to the air, but need to receive good amounts of sunlight. Schools can also make use of playing fields in nearby public open spaces.

### **Ground Floor Residential in Town Centres**

2.2.21 Residential uses in town centres should usually be located above other uses. However residential units may be acceptable on street level in certain parts of town centres where there are lower levels of footfall and where they will not compromise the clustering of non-residential uses and undermine the vitality and viability of a town centre.

2.2.22 Where residential uses are located on ground level, they need to be carefully designed to allow good levels activity and overlooking on to the public realm without compromising the privacy of the unit. Privacy strips will usually need to be provided as well as individual entrances to each home. Bedrooms and other privacy sensitive uses should be located away from the public realm.

### **SPG IMPLEMENTATION 2.2 DESIGNING SUCCESSFUL HIGH DENSITY HOUSING INTENSIFICATION**

Town centre partners are encouraged to consider how new development and redevelopment proposals within and on the edge of town centres can support housing intensification in town centres in line with Policy 2.15Cb.

Development should draw on the good practice design principles above to secure high quality mixed use development which integrates high density housing, maximizing active frontage on ground floors.

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# ENDNOTES

<sup>1</sup> See also Mayor's Housing Strategy (2014) and Housing Supplementary Planning Guidance (2013)

<sup>2</sup> Accommodating Growth in Town Centres, Peter Brett, Maccreanor Lavington, Graham Harrington, 2014

<sup>3</sup> Photo courtesy of Getty images

<sup>4</sup> GLA, Housing Strategy, 2014

<sup>5</sup> See Mayor's Housing Strategy (2014)

<sup>6</sup> HM Treasury. Joint Ventures: a guidance note for public sector bodies forming joint ventures with the private sector. March 2010

<sup>7</sup> See Homes and Community Agency or English Cities Fund for examples ([www.homesandcommunities.co.uk](http://www.homesandcommunities.co.uk), [www.englishcitiesfund.co.uk](http://www.englishcitiesfund.co.uk))

<sup>8</sup> See HM Treasury, Spending Review 2010, October 2010 and HM Government, Local growth: realising every place's potential, October 2010

<sup>9</sup> Accommodating Growth in Town Centres, Peter Brett Associates, Maccreanor Lavington, Graham Harrington, 2014

<sup>10</sup> Urhahn Urban Design, Urban Progress Studio, GVA Grimley. Housing Intensification in seven South London town centres. LDA, 2009; Urhahn Urban Design, CBRE. TEN: town centre enhancement in north London. LDA, GOL 2007

<sup>11</sup> Maccreanor Lavington, Emily Greeves Architects, Graham Harrington. Housing Density Study, GLA, 2012

<sup>12</sup> Image courtesy of of Maccreanor Lavington Architects

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## 3. QUALITY MATTERS

3.0.1 Having considered the need for town centres to evolve and support a diverse range of uses in section 1 and the potential for town centres to deliver housing intensification and mixed use development in section 2, this section addresses the implementation of matters relating to the quality of town centre development. Guidance covers a range of issues including public realm; the role of town centres in promoting safe, healthy, inclusive and lifetime neighbourhoods; supporting small shops and street markets; and the role of town centres in the response to climate change.

### 3.1 PUBLIC REALM

3.1.1 High quality urban design, public realm and environment are of paramount importance if town centres are to be successful places to live, work and visit and attract investment. They should be integral to strategies to regenerate town centres with a diverse range of services and increased residential population with an improved quality of life.

3.1.2 Town centres should be safe, secure, accessible, inclusive, connected, easy to understand and maintain. Buildings and spaces should be flexible and adaptable to enable the centre to evolve over time as well as providing opportunities for more flexibility by time of day or day of the week and supporting potential for artistic and cultural animation. The public realm, open spaces and where relevant, parks and the 'blue ribbon'

network of water spaces, should contribute to the identity, attractiveness and accessibility of town centres, provide places to relax, interact and eat, and help address issues such as poor ambient noise, air quality as well as respond to climate change<sup>1</sup>.

3.1.3 Town centre development and projects should:

- secure high quality public realm (policy 7.5) and contribute towards an enhanced environment, urban greening and links to green infrastructure (policies 2.15Bg, 2.18, 5.10 and 5.11)
- connect walking routes and green infrastructure to encourage pedestrian and cycle access<sup>2</sup> and strike an appropriate balance between the place and movement functions of streets.

3.1.4 Providing pedestrians with pleasant, safe and legible urban realm (London Plan policy 7.5) in town centres is a key factor in the success of a centre. The Mayor set out his commitment to high-quality public realm in London in the document 'London's Great Outdoors'<sup>3</sup>. This includes the 'better streets', practical guide to delivering physical improvements that raise the quality of the Capital's streets. Roads and streets are a core element of the public space in London's town centres. The five stages of implementation for better streets are shown overleaf.



3.1.5 Town centre public realm should:

- support a safe and secure environment at all times (see Legible London<sup>4</sup>) and facilitate safe and convenient street crossings
- minimise clutter by removing or merging unnecessary signage, railings or other street furniture
- be flexible and adaptable to allow for a wider range of activities, events and uses of the town centre (and the availability of power/water to support them)
- include well-connected pedestrian and cycle routes between arrival points and town centre destinations
- include sufficient and well maintained lights and pavement, and places to sit such as benches with arm rests and back rests, suitable for a range of people
- provide a navigable environment and way-finding with easy to follow and logical 'shore lines' important for visually impaired people. Shore lines are fixed

- features which form lines or routes which can be followed, for example a building edge, the front of shops, or when provided a kerb line. It is important for people using them that these features are clear, navigable, and unobstructed, to allow effective navigation of the space
- include sufficient cycle parking which is conveniently located for town centre visitors, employees and residents, secure and safe and easy to use.

3.1.6 When planning for town centre open space, local authorities should consider:

- the open space needs of the area, including open spaces in the London Plan hierarchy that are accessible to the centre – see 2013 London Town Centre Health Check for data<sup>5</sup>
- the existing, proposed and potential functions of open space, including for cultural events and markets
- connecting and integrating sites and



**CASE STUDY BETTER STREETS DELIVERED: WIMBLEDON STATION FORECOURT**



Before



After

green infrastructure with pedestrian and cycle routes.<sup>6</sup>

3.1.7 Other design elements which can affect the way in which town centres are used include:

- Lighting to improve the aesthetic quality of the night time environment and improve safety taking into account the needs of visually impaired people
- Delineation of boundaries providing a clear indication of what is publicly accessible and provide clear responsibility for management and maintenance
- Cultural and artistic projects<sup>7</sup> and animation to help to engender activity, act as a catalyst for inward investment and help to change perceptions of an area or raise an areas' profile
- Consideration of whether shared space arrangements would be beneficial, taking into account the role and function of the area as well as the various needs of different user groups, including disabled people
- Greening, water spaces and use of landscaping to soften the visual experience, enhance biodiversity, manage flood risk, mitigate the effects of overheating and provide shade and shelter. Trees with large canopies are particularly important in this respect. Sustainable drainage systems can double up as attractive landscaping elements and surface water storage (see SPG Sustainable Design and Construction)
- Ensuring that the town centre is accessible by a range of transport, especially sustainable modes, and that the associated infrastructure requirements to maintain and improve the accessibility of the town centre are met.

### Safer town centres

3.1.8 A high quality, well designed, accessible and inclusive town centre environment can decrease crime as well the fear of crime, which is essential for a vibrant and successful centre with a high quality of life and good community cohesion (policy 7.3). The 2011 London riots also raised concerns over the safety of commercial and residential town centre properties.

3.1.9 The design, layout and mix of town centres uses should:

- promote pride and a sense of ownership in town centres through public involvement in regeneration, design or management of projects
- reduce the opportunities for crime and anti-social behaviour through design
- provide clear, direct and well lit routes between arrival points such as public transport stations or car parks and town centre destinations
- encourage compatible mix of uses including night time and day time activity to create sustained activity on streets and other public places
- consider grouping night time activities (see section 1.2) adjacent to public transport and ensuring that routes to/ from bus stops, taxi ranks and stations are well lit, overlooked and active
- create natural surveillance and continuous activity by bordering public spaces with residential uses, street cafes, vending stalls etc
- mix drinking establishments with other leisure uses with later opening hours such as theatres, cinemas, restaurants or coffee shops
- support a variety of uses and activities to cater for a range of town centre users who may otherwise be excluded

from standard commercial town centre activities due to age or lack of money (e.g. cultural events, libraries, learning and community centres)

- promote road safety through good design and lower speed limits.

### **SPG IMPLEMENTATION 3.1 PUBLIC REALM**

Boroughs and town centre partners are encouraged to:

- a take a wider approach to street design, drawing on the 'Better Streets' toolkit and 'Legible London'
- b improve the public realm and reduce street clutter
- c enhance environmental quality in individual developments, spaces and public realm
- d promote measures to support safer town centres, reducing crime and the fear of crime and anti-social behaviour.

## **3.2 PLANNING FOR LIFETIME NEIGHBOURHOODS**

3.2.1 Across London the larger centres are complemented by smaller scale District centres which provide a greater proportion of convenience goods and services, and over 1,000 Local and Neighbourhood centres which provide essential convenience goods and services for more local communities and particularly accessible on foot or bicycle. Town centres are often at the heart of 'walk to' lifetime neighbourhoods (see policy 7.1)<sup>8</sup>, places where access to public transport, basic amenities, local shops, cultural facilities, places to meet and relax, and green and open spaces are within easy reach of homes.

They also serve as community hubs, functionally and perceptually, providing a sense of place and identity.

3.2.2 The Mayor will assist boroughs and other agencies in developing lifetime neighbourhoods by providing advice and guidance within the Social Infrastructure SPG and the 2014 update of the Accessible London SPG.

3.2.3 In relation to town centres, boroughs are encouraged to:

- i) develop the role of town centres (including neighbourhood and more local centres) as the core of lifetime neighbourhoods
- ii) plan for 'walk to' services, especially in smaller centres to secure sustainable neighbourhoods
- iii) develop the role of centres as part of healthier neighbourhoods (policy 3.2) and help to reduce health inequalities<sup>9</sup>
- iv) promote local ownership and occupation of public spaces; improved pedestrian and cycling networks, environment and attractiveness, including links with residential neighbourhoods; lower speed limits; enhance the street conditions especially safety, security and accessibility for disabled people and new/improved pedestrian crossings
- v) provide a policy framework for maintaining, managing and enhancing local and neighbourhood uses, activities and facilities, that are inclusive and accessible, including:
  - local shops and services including convenience retail particularly in District, neighbourhood and more local centres (policy 4.8)
  - basic amenities including pharmacy, launderette, post

- office and bank facility/cash point (including free-to-use ATM services)
- health and social care facilities and other social infrastructure
  - arts, cultural, sports and leisure facilities
  - visitor infrastructure, including accessible hotel rooms (see Appendix B: Accessible Hotels)
  - improving accessibility by and of public transport (see section 4.2), step-free and de-cluttered street environment, shopmobility and disabled persons parking and drop off
  - a mix of accessible housing types within and around town centres including family homes, specialist housing for older people and higher density dwellings closer to public transport nodes
  - improved quality, design and affordability of housing including generous housing unit sizes and access to private outdoor space<sup>10</sup>
  - access to employment, education and training opportunities especially for those in long term unemployment and young people not in employment or training
  - play related activities for all ages
  - places to meet, relax and get involved in the community such as cafes, restaurants, public houses, public open spaces including green space, clubs, places of worship, community centres and volunteering opportunities
  - public toilets including Changing Places WCs and accessible family facilities, including baby-changing facilities.

### Under-served areas

- 3.2.4 London Plan policy 4.8Bd underlines the need to identify areas under-served in local convenience shopping and services and support additional facilities at an appropriate scale in locations accessible by walking, cycling and public transport. Promoting widespread access to a suitable range of goods and services for all plays an important part in building lifetime neighbourhoods.
- 3.2.5 To identify under-served areas, local authorities are encouraged to:
- make use of TfL’s accessibility models and methodologies including CAPITAL, ATOS (Access to Opportunities and Services) and PTALs (Public Transport Accessibility Level) to help identify areas with poor access to services, especially food shopping and the relationship with town centres nearby (see section 4.2 of this SPG )
  - undertake retail capacity studies to investigate consumer shopping behaviour and assess quantitative and qualitative need relative to existing provisions
  - consider whether the existing town centre network can be strengthened and identify potential for viable new centres where applicable, including local and neighbourhood centres (see policy 2.15 and 7.1 and SPG section 6.2)
  - ensure that addressing the needs of under-served areas does not lead to inappropriate out of centre or out of scale retail development (see section 6.3)
  - consider whether local centres can be made more accessible, especially by public transport, walking and cycling (see section 4.2)
  - address provision and accessibility of goods and services in under-served areas as part of neighbourhood-based action

and investment in areas for regeneration (policy 2.14).

3.2.6 Ensuring convenient and sustainable access to the facilities detailed in paragraph 3.2.3 above (policies 2.15, 4.7 and 4.8) does not imply that individual neighbourhoods must be self-sufficient in terms of providing all types of facilities. Some types of facility (for example larger superstores) will not normally be appropriate within or on the edges of neighbourhood and local centres due to their scale. These facilities should be made accessible by public transport. Local authorities should facilitate local development in line with local needs while also recognising that, cumulatively, development can contribute to the strategic needs of the whole borough and further afield.

3.2.7 Against this backdrop, Policy 4.8Bc encourages boroughs to develop policies to prevent the loss of retail and related facilities that provide essential convenience shopping and services. These policies should take into account local circumstances including:

- the continuing viability of a particular use
- any history of vacancy
- the prospect of achieving reuse at prevailing market values
- whether the unit has been marketed effectively for reuse

### **Access to fresh food**

3.2.8 To help increase access to fresh food boroughs can:

- support shops that provide essential day-to-day needs (including fresh food) for local communities in District, neighbourhood and local centres by providing and supporting affordable shop

units suitable for small or independent retailers (see policy 4.9 and SPG section 3.4)

- identify areas with poor access to fresh food (having regard to price, variety and accessibility) in order to inform retail policies and planning decision making
- coordinate initiatives that encourage the provision of affordable fresh food in locations accessible by walking and cycling, including street markets, with food sourced locally whenever possible. Sustain's Good Planning for Good Food report<sup>11</sup> gives an overview of some initiatives that local authorities in London have explored to increase retail diversity in their areas, as part of policies to tackle rising rates of obesity and diet-related illness.

### **SPG IMPLEMENTATION 3.2 PLANNING FOR LIFETIME NEIGHBOURHOODS**

Boroughs and town centre partners are encouraged to:

- a promote healthy neighbourhoods and develop the role of town centres (including local and neighbourhood centres) as the core of 'lifetime neighbourhoods'
- b identify areas 'under served' in convenience retail and other essential local services, taking into account the needs of all people across all stages of their lives, and develop local criteria to assess deficiencies
- c consider whether the existing town centre network can be strengthened and made more accessible to address 'under served' areas, and/or whether there is potential for viable new centres including local and neighbourhood centres in line with London Plan policy 2.15



d support initiatives which promote access to fresh food.

### 3.3 ACCESS AND INCLUSION

3.3.1 The London Plan (paragraph 7.5) recognises that applying inclusive design principles ensures that families with small children, older people and disabled people can move around, enjoy and feel secure in their neighbourhoods, enables everyone to participate in, and contribute to, the life of the community. London Plan Policy 7.2 and associated Accessible London SPG promote an inclusive environment.

3.3.2 People should have easy access by public transport and active travel modes (walking and cycling) to town centres, services and facilities that are relevant to them. They should be able to safely and easily move around town centres and associated neighbourhoods through high quality spaces, while having good access to the wider city.

3.3.3 The areas between sites and buildings should also be considered. The design of the landscaping and the public realm is crucial to how inclusive the development is for many people (see 4.7). Consideration should be given to the routes from the public transport facilities to the entrance points. Routes and crossing points should be legible, clutter and step-free, and clearly identifiable. Way finding should ensure that people find travelling around the area easy, safe and comfortable.

3.3.4 As well as ensuring new developments are inclusive there are a range of

measures to improve the accessibility of the existing shops, services, leisure and employment uses in town centres. Some are listed below however every site should be assessed individually in terms of inclusive design:

- Disabled persons parking and drop off / pick-up
- Step-free access to building entrances and accessible routes across areas of public realm
- Entrance arrangements i.e. automatic doors
- Counter, bar and reception desk heights
- Lift access to all floors
- Wheelchair user accessible facilities, for example hotel rooms or changing rooms
- The provision of services such as hearing loops
- Accessible toilets and Changing Places toilets (paragraph 1.5.2)
- Shopmobility services.

#### CASE STUDY ACCESS AUDIT

Islington Council has developed a framework to gather objective and subjective data on the condition of town centres and how they are experienced by diverse communities. The framework involves:

- Working with the Town Centre Management Group to raise awareness around inclusion and diversity; improving the accessibility of the environment and the provision of services in the area
- Working with organisations of disabled people to identify those issues that specifically or disproportionately affect them
- Commissioning consultants to work in liaison with local organisations

of disabled people to assess the physical, social and economic barriers to proper inclusion that exist

- Using the findings of those audits to monitor implementation, evaluate success and refine planning briefs and area specific Planning Guidance and provide a reference point for Development Control officers and Councillors determining planning applications in the area.

3.3.5 Although not a substitute for good access, Shopmobility schemes can help overcome some of the barriers created in shopping areas and town centres. Schemes loan or hire out mobility equipment such as manual wheelchairs, powered wheelchairs, and mobility scooters to members of the public who require or would benefit from the use of the equipment. Shopmobility services can be used by anyone, young or old (although most schemes have a minimum age), people with temporary impairments or injuries, long or short term impairments. Further information on Shopmobility is provided by the National Federation of Shopmobility<sup>12</sup> and the 2014 draft Accessible London SPG.

3.3.6 Local authorities should take an active role in promoting and supporting and existing schemes and appropriate boroughs should seek to secure the establishment of new schemes via the planning process.

3.3.7 Together these measures not only improve accessibility to town centres to all and support a shift to more sustainable modes of travel but also help strengthen the town centre and its

businesses by increasing the potential consumer spend available.

### **SPG IMPLEMENTATION 3.3 ACCESS AND INCLUSION**

Boroughs and town centre partners are encouraged to:

- a Ensure all retail developments and proposals in town centres meet the London Plan requirements for Inclusive Environments
- b Take an active role in promoting and supporting existing shopmobility schemes and secure the establishment of new schemes
- c Seek to improve the existing social infrastructure, such a public toilets, that support the town centre, including shortcomings identified in town centre health checks
- d Support access improvements to the street environment and existing buildings.

For detailed information see the 2014 draft Accessible London SPG.

### **3.4 SMALL SHOPS**

3.4.1 Small shops<sup>13</sup> can improve consumer choice and convenience to communities they serve, benefit the local economy in terms of local employment and income generation, and enhance the character and vibrancy of town centres. However, the number of small shops in London has fallen by 20 per cent in the past decade.<sup>14</sup> Such a decline has been caused by many factors, including changes in shopping behaviour, competition from supermarkets, internet shopping and rising rents.<sup>15</sup> Within this context, the Mayor's aspiration to support small shops has been embedded

into London Plan Policy 4.9.

## POLICY 4.9 SMALL SHOPS

### Planning decisions

A In considering proposals for large retail developments, the Mayor will, and Boroughs should, consider imposing conditions or seeking contributions through planning obligations where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or independent retailers and service outlets and/or to strengthen and promote the retail offer, attractiveness and competitiveness of centres.

### LDF preparation

B In LDFs, Boroughs should develop local policies where appropriate to support the provision of small shop units.

3.4.2 Policy 4.9 applies to new large retail development proposals (the default threshold for which is 2,500 sqm gross floorspace) where these would lead to adverse effects upon small shops and/or town centres unless mitigation is made through conditions or planning obligations. Retail proposals of less than 2,500 sqm may, in some circumstances, give rise to adverse impacts on small shops and/or town centres and boroughs may wish to identify a lower threshold in local policies drawing upon local evidence.

3.4.3 The potential adverse effects of large retail development on small shops and/or town centres may include:

- the direct loss of small shops
- the failure to meet an identified need for

small shops in a centre and

- adverse impacts of trade diversion that could lead to the loss of small shops.

3.4.4 Mitigation measures must comply with the rules for planning conditions and section 106 planning obligations<sup>16</sup> and could include:

**(A) Provision of affordable small shop unit(s)**, particularly where the proposal would lead to a direct loss of small shops or there is an identified need for small shops in the locality. Such provision can be:

- directly on-site as part of the development proposal in a suitable location that supports the viability of the units and integration with the town centre
- or off-site where on-site provision is not feasible, for example due to design or layout considerations. In this case a developer could undertake to build new small shop units or refurbish existing vacant units in the vicinity of the development. Provision must pass the reasonableness tests in CIL regulations and Circular 05/05.

**(B) Contributions to support affordable small shops** to mitigate adverse impacts of the development by investing in measures to improve environmental quality which support existing small shops and the attractiveness/competitiveness of centres. This option may be more suitable where small shop units are over-provided, vacant or under-used.

- The level of contribution required should be based on local circumstances and viability considerations.
- Contributions must be directly related to the development being assessed.

- As individual contributions are unlikely to be able to mitigate a specific loss or need, they will usually be pooled. The pool should be focused on the relevant centre and be used for purposes which support the objectives of the relevant London Plan policies (Policies 2.15, 4.7, 4.8, 4.9 and 7.1).
- Financial contributions can be made through a development trust.
- All situations must avoid breaching the EU State Aid rules (see below).

3.4.5 Mitigation measures in Policy 4.9 should be:

- **Appropriate** – having regard to the individual characteristics of the town centre and the opportunities presented by the potential retail development. The appropriateness of application of Policy 4.9 should be weighed against other strategic priorities for planning obligations set out in Policy 8.2 of the London Plan, particularly for affordable housing, funding for Crossrail (where relevant) and other public transport improvements.
- **Feasible** – taking into account practical considerations including design and layout. Developers should demonstrate flexibility in terms of scale, format, orientation and car parking arrangements to facilitate the provision of small shops and ensure that these are viable and well integrated with the town centre by walking and cycling.
- **Viable** – having regard to the effect of the policy on development costs. Alone, or in conjunction with other planning obligations, the small shops obligation must not compromise the viability of the proposed retail development. An open book approach to negotiations should be adopted to ensure that planning

obligations are secured at appropriate levels.

### Local Policy Approach

3.4.6 Drawing on the London Small Shops Study 2010 (LSSS10)<sup>17</sup> town centre health checks and local retail needs studies, boroughs are encouraged to identify the local need for affordable small shops, and the need to improve town centre viability for a range of local services. Appendix C contains a list of potential local indicators to identify need for small shops.

3.4.7 Having regard to London Plan Policy 4.9, boroughs are encouraged to set out appropriate local policies for their centres and clarify:

- the local policy objectives (for example to mitigate the loss of small shops, to meet need for affordable small shops or to improve the viability of small shops and associated town centre)
- the definition of small shops in terms of floorspace and the large retail development floorspace threshold at which the policy applies (if different from the London default threshold of 2,500 sq m gross floorspace)
- what the expected outcomes are (for example on-site or off-site provision or financial contributions)
- how the financial contributions would be spent, for example public realm improvements, town centre management initiatives, shop front schemes or securing premises
- other matters such as eligible uses, eligible occupiers, affordability, ownership and monitoring – see below).

3.4.8 When implementing small shops Policy 4.9 account should be taken of:

- Size of the units - could be limited by a condition or clause in the obligation
- Affordability - boroughs should consider (a) what would constitute an affordable rent in their area (for example it could be based upon a stated rent as a percentage of local prime rents or agreeing a fixed rent for certain period, subject to not breaching State Aid rules) and (b) the terms of the lease, including length and break clauses
- Length of time for the obligation - the restrictions to secure affordable small shop units can apply to the development indefinitely. However, this does not mean the affordable small shop units can be secured forever due to developer's right to make an application to vary Section 106 agreements after 5 years. If the small shop is transferred into the ownership of a community development trust (see below), the affordability of the units could be secured for a much longer period
- Ownership - local policy should consider the ownership of affordable small shop units. In some instances it may be appropriate or necessary to transfer ownership to another body (for example to a community development trust (CDT), who can manage the premises, eligible uses and occupiers)
- Eligible uses could be limited by a condition or clause in the obligations restricting range of uses/trades/ type of goods or operations which boroughs in collaboration with local communities deem provide local benefits (e.g. convenience shops, pharmacies, launderettes, post offices etc). Alternatively they could be managed through an ownership mechanism (see above)
- Eligible occupiers – small shop units

### CASE STUDY: ELEPHANT & CASTLE

Southwark Council in collaboration with the Mayor adopted a Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF) March 2012. One of the aims of the SPD/OAPF is to maximise diversity within the town centre to accommodate a range of occupiers such as large multiple stores and independent small and medium sized (SME) operators.

The SPD/OAPF states that “large retail developments (including refurbishments) over 1,000 sq m should:

- Contribute to the provision of a vibrant mix of retail uses to add diversity to the town centre.
- Provide a range of shop unit sizes, including affordable units. We will use planning conditions or section 106 planning obligations to ensure that at least 10% of new floorspace (GIA) is made available as affordable space to provide suitable premises for small and medium sized enterprises in the opportunity area who have been displaced as a result of development, new business start-ups or independent retailers.”

(Extract from SPD 1: Shopping)





should be suitable for occupation by independent retailers and service outlets. It is not normally possible for this to be specified in an obligation but it could be managed through an ownership mechanism (see above)

- Monitoring - boroughs are encouraged to design a mechanism to monitor implementation/impact of their policies.

### **Implications of the Community Infrastructure Levy Regulations**

3.4.9 Local planning authorities should:

- ensure that policy 4.9 is implemented in compliance with CIL regulations
- not charge generalised pooled charges or tariffs on developments and
- only use planning obligations where they meet all the statutory tests (as set out in the CIL Regulations).

3.4.10 In line with this, the scope of Section 106 is now restricted. By virtue of Regulation 122, a planning obligation can now only be utilised where it meets the three tests - obligations must be necessary, directly related to the development, and fairly and reasonably related in scale and kind to the development.

### **State Aid Rules**

3.4.11 The European Union rules against unlawful state aid preclude public financial support passing direct to an individual retailer through rental payments being set at a subsidised level. Article 87(1) of the EC Treaty sets out the aim of controlling state aid: "Save as otherwise provided in this Treaty, any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain

undertakings or the production of certain goods shall, insofar as it affects trade between Member States, be incompatible with the common market."

3.4.12 Policy 4.9 does not constitute state aid as it involves no direct or indirect provision of State resources to the beneficiary of the policy. Any support or 'aid' in this context would be provided by a developer in line with a policy aiming to secure a more diverse retail offer or to support, strengthen and promote the retail offer, attractiveness and competitiveness of a centre.

3.4.13 When developing small shops policies, boroughs should:

- take into account the EU rules concerning state aid
- ensure that policies are worded and implemented in compliance with EU rules
- consider the role of CDTs as vehicles for policy implementation.

### **SPG IMPLEMENTATION 3.4 SMALL SHOPS**

Boroughs and town centre partners are encouraged to:

- a identify whether there is a local need for affordable small shops
- b develop local policies where appropriate and clarify:
  - i) local policy objectives
  - ii) the definition of small shops and the large retail development floorspace threshold at which the policy applies
  - iii) expected outcomes (for example on-site or off-site provision or financial contributions)
  - iv) how the financial contributions would be spent and

v) other matters such as eligible uses, eligible occupiers, affordability, ownership and monitoring.

### 3.5 MARKETS

#### EXTRACT FROM POLICY 4.8 SUPPORTING A SUCCESSFUL AND DIVERSE RETAIL SECTOR

##### Planning decisions and LDF preparation

- B LDFs should take a proactive approach to planning for retailing and:
- e support the range of London's markets, including street, farmers' and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres

supermarket counterparts. Many people rely on markets for their shopping, especially those without access to a car.<sup>18</sup>



Ridley Road Market, Dalston Town Centre

- 3.5.1 Markets can deliver tangible social and economic benefits to communities and local business. They can support regeneration, economic development and tourism and provide access to culture, fresh food and specialist foods. Markets can also make a significant contribution to the vitality and diversity of London's town centre offer. Some street markets (e.g. Portobello Road, Borough, Columbia Road) are tourist attractions of international significance.
- 3.5.2 There is a close correlation between the location of markets and the most deprived areas of the capital. The existence of markets supports higher living standards for people in deprived neighbourhoods providing access to good quality and affordable produce at prices on average as competitive as their

- 3.5.3 Research by the London Assembly, GLA and CLG<sup>19</sup> shows that while some markets are thriving others face challenges. Despite the success of farmers' and specialist food markets, the majority of traditional street markets are in decline, especially those in the more deprived parts of inner London. This reflects:
- retailing trends and increasing competition from supermarkets and discount stores (for example, longer supermarket opening hours make them more accessible for commuters);
  - lack of management and investment; the current regulatory framework (1990 London Local Authorities Act) hinders council's abilities to manage their markets on a commercial basis. Many boroughs are unwilling or unable to invest in their markets and adopt an

approach prioritising enforcement over commercial management. However there are also examples of good practice:

### **CASE STUDY GOOD PRACTICE IN MANAGING MARKETS IN ISLINGTON**

Running effective street markets is a high priority for Islington Council which has a formal long term strategy for its markets. Past work has seen substantial investment in Whitecross Street market (in part using New Deal for Communities funds). The markets team also runs a range of promotional activities and training sessions for traders 2–3 times a year.

### **SPG IMPLEMENTATION 3.5 MARKETS**

Boroughs and town centre partners are encouraged to:

- a support the range of London's markets in the light of local circumstances
  - b consider enhancing existing markets and re-introducing or creating new ones
  - c ensure that markets remain attractive and competitive by investing in their management and improvement
  - d take a leading role in supporting the maintenance and development of markets including those located within town centres
  - e consider developing and adopting a formal borough strategy for markets and/or incorporating policies for markets within local plans either as stand-alone policies or as part of wider policies for retailing and/or town centres
  - f integrate markets in the wider management of town centres, including town centre strategies (see section 6.1) and their role in addressing under-served areas (section 3.1)
  - g promote a competitive town centre environment
  - h consider how to mitigate impacts, for example on town centre access, including any changes in servicing and bus routes
  - i incorporate indicators related to markets within town centre health checks (including the type of market, ownership, total number of pitches, number of pitches in use, total number of pitch days per year)
  - j adopt a co-operative approach between market stakeholders (including London market managers and traders) to tackle challenges faced by market traders when developing strategic plans for their markets including visitor attractions
  - k consider the need for a market champion to co-ordinate these approaches if appropriate, resources permitting
  - l adopt a proactive approach to market management (e.g. investment, development, quality/appearance of trading areas, promotion and training)
  - m review market management structures if necessary to ensure that they reap economic and non-economic benefits
  - n harness the potential contribution of markets to tourism and regeneration through town centre strategies and locally tailored approaches to regeneration (as visitor attractions of local, city wide, national or international significance).
-

## 3.6 SUSTAINABLE TOWN CENTRES AND CLIMATE CHANGE

3.6.1 This section of the SPG provides guidance on climate change mitigation and adaptation specific for town centres, in accordance with chapter 5 of the London Plan. More detailed guidance and best practice measures of climate change mitigation and adaptation can be found in Mayoral strategies<sup>20</sup> and the Sustainable Design and Construction SPG.

### Climate change mitigation

3.6.2 The higher density and wider mix of uses that create town centres make them uniquely placed to tackle climate change. Local authorities should promote these areas for growth at higher densities supporting the use of carbon efficient modes of transport such as public transport, encouraging sustainable modes of travel such as walking and cycling and enabling efficient investment in infrastructure for servicing (see section 4).

### Energy efficiency

3.6.3 London Plan policy 5.2 sets out the Mayor's energy hierarchy and carbon reduction targets for major developments. Town centre developments can achieve high levels of energy efficiency through careful design. Commercial buildings generally have higher electricity consumption than residential and generate more heat within the building, which can lead to overheating. In commercial buildings especially, particular consideration should be given to:

- balancing the generation of heat from solar gain and the need for day lighting

- ensuring that artificial lighting is efficient, including through the use of sensors and timers
- reducing internal heat gains and
- removing heat from the building in an energy efficient way.

3.6.4 Traditionally, heating has been the largest energy requirement within residential buildings, although the proportion of carbon dioxide emissions resulting from heating is declining due to more stringent Building Regulations and water efficiency measures. Therefore the design of buildings with a residential element needs to consider the long term climate change impact on the heating and cooling needs of occupiers of these buildings as well as how the use of lighting and appliances can be minimised. Further guidelines on residential development are set out in the Mayor's Housing SPG.

### Energy supply

3.6.5 The higher density, greater mix of uses and differences in energy demand between commercial and residential buildings at different times of the day makes town centres particularly suited to combined heat and power and decentralised energy networks. London Plan policy 5.5 sets out the Mayor's expectation that 25 per cent of heat and power used in London is to be generated through the use of local decentralised energy systems by 2025. To ensure that this target can be met effectively it is essential that

- decentralised energy is developed in areas of higher densities with a mix of uses such as town centres
- decentralised energy is retro-fitted to existing buildings with a high heating

demand

- local authorities develop energy masterplans for areas of high heat density for the development of decentralised energy networks.

3.6.6 To generate effectively low and zero carbon energy locally and facilitate the supply of this energy, local authorities should identify and support opportunities for such infrastructure within their town centres. An energy masterplan should be developed with the help of the **London Heat Map**<sup>21</sup> and should include:

- at least a desk top study to identify sites with a high heat demand, sites that generate waste heat, known sites to be redeveloped, areas of growth in or at the edge of town centres
- potential locations for energy centres, pipes routes and identifying buildings that could connect to a network.

### **Renewable energy**

3.6.7 London Plan policy 5.7 seeks to increase the proportion of energy generated from renewable sources in London, including through renewable energy technologies incorporated into major developments. Due to the higher densities in town centres, it may take additional effort to achieve a reduction in carbon dioxide emissions from renewable energy technologies. However the careful and innovative design of schemes should still enable the incorporation of some renewable energy technologies. Constraints to be considered include:

- limited roof space and overshadowing restricting the use of solar technology
- traffic congestion and poor air quality detract from the use of biomass
- obstacles below ground and ground

conditions limiting the implementation of ground source heat pumps.

3.6.8 Renewable energy can also be integrated into street furniture within town centres such as bus shelters, signs, parking metres, lighting and information boards as well as other more remote equipment.

### **Retrofitting**

3.6.9 The investment and potential for redevelopment at higher densities in town centres also provide greater opportunities to retro-fit energy efficiency and other sustainability measures into buildings, both through the Building Regulations and planning requirements. Measures include:

- energy efficient lighting, zoning, motion sensors, light sensors and timers
- upgrading insulation and windows
- upgrading heating, hot water and cooling systems, including zoning/controls
- water efficiency measures (see also the Mayor's Water Strategy)<sup>22</sup>
- green roofs (vegetated and non-vegetated)
- renewable energy technologies.

3.6.10 The Mayor and boroughs run various programmes to support businesses and residential occupiers in reducing their carbon dioxide emissions.

### **Climate change adaptation**

3.6.11 Town centres can suffer from higher local temperatures than their surrounding lower density areas. This is called the urban heat island effect. In the summer the inability for the heat to dissipate can make conditions uncomfortable for those living and using town centres. Hotter temperatures can also amplify some existing health conditions. Local



authorities should consider:

- increasing the amount of vegetation in town centres including soft landscaping, trees, green roofs/walls (see the Sustainable Design and Construction SPG, and the All London Green Grid SPG).
- using light coloured surfaces and materials which reflect heat
- reducing motorised vehicles
- minimising the need for plant/equipment that expel heat into the atmosphere.

3.6.12 The risk of flooding in town centres is subject to their location in relation to rivers, marine and river catchments and the effectiveness of local or up stream surface water drainage systems. Due to the greater amount of hard surfaces in town centres, they can contribute more to local surface water flooding or to flooding down stream. Therefore it is essential that developments in town centres meet the objectives of London Plan policy 5.13 (for example through soft landscaping, permeable paving, green roofs etc)<sup>23</sup>.

### Air Quality

3.6.13 Air quality is generally poorer in town centres due to the large volume of traffic movements and the higher density of boilers which emit air pollutants. Local authorities should have regard to London Plan policy 7.14 and the Mayor's Air Quality Strategy<sup>24</sup> which set out measures that can be taken to enable developments to be 'air quality neutral' and to minimise the exposure of building occupants and visitors to town centres to poor air quality. Measures to reduce the environmental impact of transport are important, including provision of electric vehicle infrastructure and promoting

more sustainable modes such as walking and cycling. The Mayor is working with boroughs through his Air Quality Fund to reduce pollution and improve the environment in some town centres. The Air Quality Street Design Toolkit<sup>25</sup> shares best practice and facilitates the inclusion of measures to improve air quality at and around new developments.

3.6.14 With regard to construction, development sites in town centres can often be constrained by adjoining buildings, congested roads and pavements and limited space on-site. It will be essential that local authorities, partners and developers consider site constraints and manage the construction process carefully. Further guidance is provided in the Mayor's SPGs on 'Sustainable Design and Construction' and the 'Control of dust and emissions from construction and demolition sites'.

### Waste

3.6.15 London Plan policy 5.17E requires suitable waste and recycling storage facilities in all new developments. Adequate dedicated waste and recycling facilities and space are an important consideration in town centre developments where:

- a mix of uses may be provided within a building
- internal space is limited and
- there is no access to a garden.

3.6.16 The predominantly higher density of residents, shops, restaurants and cafes in town centres provides potential for small scale organic 'energy from waste' technologies. To facilitate waste management in public town centre spaces, local authorities should have

regard to proposals and actions in the Mayor's Municipal and Business Waste Management Strategies<sup>26</sup>.

### **Economic opportunities from the transition to a low carbon capital**

- 3.6.17 Businesses often benefit from locating near like minded businesses or those offering similar or complementary services. Boroughs are encouraged to:
- consider policies that encourage a concentration of business and activities that support the transition to a low carbon economy (e.g. Green Enterprise Zones)
  - facilitate business and operations that would support the implementation of the Government's Green Deal and the 'zero carbon' buildings<sup>27</sup>
  - support businesses in specialising and marketing themselves for various sustainability measures (e.g. use of low emission vehicles, sourcing food locally, using Fairtrade products or working with the local community).

### **SPG IMPLEMENTATION 3.6 SUSTAINABLE TOWN CENTRES AND CLIMATE CHANGE**

Boroughs and town centre partners are encouraged to:

- a deliver a range of actions to support climate change mitigation and adaptation, improve air quality and manage waste collection and construction in town centres
- b secure economic opportunities for town centres from the transition to a low carbon capital.

## ENDNOTES

<sup>1</sup> See Mayor's Strategies including those for ambient noise, air quality, energy and climate change

<sup>2</sup> See Mayor of London: All London Green Grid SPG and Shaping Neighbourhoods SPG

<sup>3</sup> <http://www.london.gov.uk/priorities/environment/londons-great-outdoors>

<sup>4</sup> TfL, Legible London, <http://www.tfl.gov.uk/microsites/legible-london/>

<sup>5</sup> Mayor of London. 2013 London Town Centre Health Check. GLA, 2014

<sup>6</sup> For more details see London Plan policies 2.18, 7.18; Mayor of London: All London Green Grid SPG and Shaping Neighbourhoods SPG and Mayor of London/CABE, Open Space Strategies Best Practice Guidance. GLA, 2009

<sup>7</sup> See Mayor of London. Culture on the High Street, GLA 2013: <https://www.london.gov.uk/priorities/arts-culture/promoting-arts-culture/culture-on-the-high-street>

<sup>8</sup> In draft Further Alterations to the London Plan (FALP) three principles are advanced to help frame the concept of lifetime neighbourhoods as places where people at all stages of their lives:

1. can get around – neighbourhoods which are well-connected and walkable;
2. as far as possible, can have a choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and
3. belong to a cohesive community which fosters social interaction and social capital

<sup>9</sup> The impact of major town centre development

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proposals on the health and well-being of communities should be considered through the use of Health Impact Assessments (HIA) in line with Policy 3.2.

<sup>10</sup> Mayor of London, Housing Design Guide, Design for London, August 2010

<sup>11</sup> [http://www.sustainweb.org/resources/files/reports/Good\\_planning\\_for\\_good\\_food.pdf](http://www.sustainweb.org/resources/files/reports/Good_planning_for_good_food.pdf)

<sup>12</sup> [www.shopmobilityuk.org](http://www.shopmobilityuk.org)

<sup>13</sup> Defined here as a shop with a gross floorspace of 80 sq.m or less.

<sup>14</sup> GLA, London Small Shops Study 2010, May 2010

<sup>15</sup> London Assembly, Cornered Shops Report, July 2010.

<sup>16</sup> The Community Infrastructure Levy Regulations 2010, Part 11

<sup>17</sup> GLA, London Small Shops Study, June 2010 and GLA, London Small Shops Study 2010 Addendum, November 2010

<sup>18</sup> Regeneris Consulting, London's Retail Street Markets, LDA, 2010

<sup>19</sup> London Assembly. London's Street Markets. GLA, 2007. CLG Select Committee. Market Failure, can the Traditional Market Survive? House of Commons, 2009

<sup>20</sup> Mayor of London. Delivering London's Energy Future. The Mayor's Climate Change Mitigation and Energy Strategy. GLA, 2011; Mayor of London. Managing risks and increasing resilience. The Mayor's climate change adaptation strategy, GLA, 2011

<sup>21</sup> The GLA's sustainable energy team has a well developed template for energy masterplans that can be adopted for local use. The London Heat Map can be viewed at: [www.londonheatmap.org.uk](http://www.londonheatmap.org.uk)

<sup>22</sup> Mayor of London. Securing London's Water Future: the Mayor's Water Strategy. GLA, 2011

<sup>23</sup> See also Mayor's Water Strategy

<sup>24</sup> Mayor of London. Clearing the air. The Mayor's Air Quality Strategy. GLA, 2010

<sup>25</sup> Expected to be published by the GLA in summer 2014

<sup>26</sup> Mayor of London. London's Wasted Resource: The Mayor's Municipal Waste Management Strategy. GLA, 2011. Mayor of London. Making Business Sense of Waste: The Mayor's Business Waste Management Strategy. GLA, 2011

<sup>27</sup> The Green Deal is a programme gives building owners a loan to retro-fit their properties with energy saving measures and repays the loan through the savings on the energy bills





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## 4. PROMOTING ACCESSIBILITY AND CONNECTIVITY

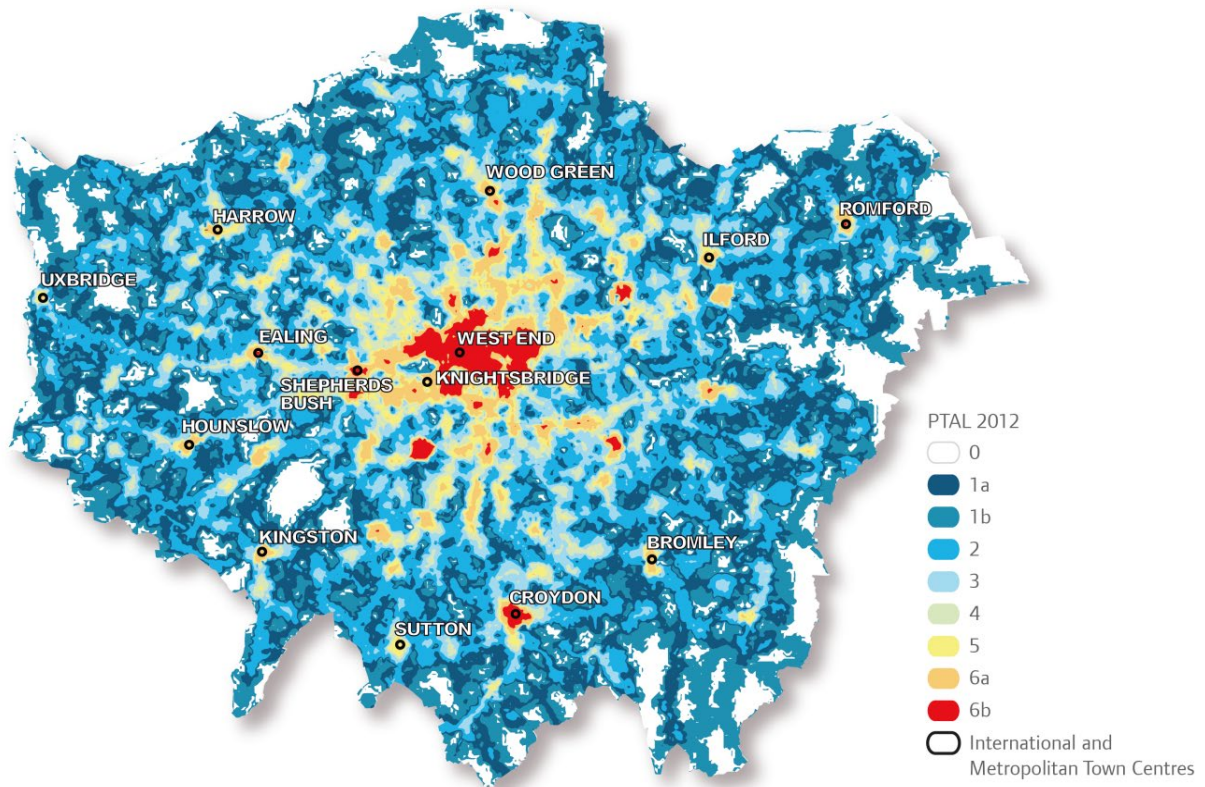
### 4.1 INTEGRATING TRANSPORT AND DEVELOPMENT IN TOWN CENTRES

4.1.1 Town centres play a vital role in London providing sustainable access to jobs, goods and services, particularly by public transport, cycling and walking. The Mayor's Transport Strategy<sup>1</sup> places strong emphasis on the need for good transport links, to allow easy, efficient

access to town centres to enable them to compete and to remain successful. Increased public transport accessibility can benefit town centres also by extending their potential resident and working catchment populations.

4.1.2 Town centres also support the close integration of transport and development (London Plan policy 6.1). Public transport services are generally focussed on these centres, with all of the Metropolitan town centres, 86 per cent of the Major centres and 36 per cent of District centres showing the highest public transport accessibility level (PTAL)<sup>2</sup> ratings of 5-6 (see Figure 4.1).

FIGURE 4.1 PUBLIC TRANSPORT ACCESSIBILITY AND TOWN CENTRES





4.1.3 Capitalising on the existing and future potential accessibility of town centres, the scope for intensification, regeneration and higher density development including housing should be explored in line with London Plan policy 2.15Cb (see sections 1 and 2). Boroughs are encouraged to promote higher densities in town centres, especially those with the highest accessibility and existing capacity or where there are plans to improve public transport provision. Conversely, higher density development can also help to support investment in new and upgrades to existing transport infrastructure and services.

### SPG IMPLEMENTATION 4.1 INTEGRATING TRANSPORT AND DEVELOPMENT IN TOWN CENTRES

Boroughs and town centre partners are encouraged to:

- a explore the scope for intensification, regeneration and higher density development including housing in line with London Plan policies 2.15Cb and 3.4, capitalising on the existing and future potential accessibility of town centres
- b promote higher density development where there are plans to improve public transport provision.

### CASE STUDY – DALSTON JUNCTION

TfL took over the concession to operate the London Overground network in November 2007. Since then, it has transformed the network from a neglected railway into the best performing train operator in Great Britain. This has been achieved through a major infrastructure upgrade to deliver increased train frequency, new trains, station enhancements, better management and service quality improvements. These improvements have facilitated and supported development activity Dalston



Junction, an East London town centre on the Overground network. The benefits of integration with the wider transport network allow increased densities and intensified economic activity through increased footfall, employment, housing and leisure opportunities.

## 4.2 PROMOTING SUSTAINABLE TRANSPORT ACCESS TO TOWN CENTRES

- 4.2.1 Transport choices are important because public transport, cycling and walking have environmental and health benefits and make more efficient use of road space than private transport – a key issue for London’s town centres, especially those affected by high levels of congestion and air pollution. Sustainable modes can also help contribute positively to the public realm in town centres.
- 4.2.2 On average walking and public transport mode shares tend to be higher in Inner London, whilst Outer London centres tend to be much more dependent on private transport than those in Inner London. Public transport shares tend to be higher in Metropolitan centres relative to Major and Districts in both Inner and Outer London<sup>3</sup>.
- 4.2.3 Policies in spatial and transport plans should have regard to factors affecting choice of transport mode and how they can be influenced to secure changes in modal shift towards public transport, cycling and walking to town centres, whilst enabling choice for trips that may necessitate private transport (e.g. purchase of bulky items). Factors to be taken into account include:
- current and potential future social / travel characteristics (e.g. car ownership, income and household structure)
  - purpose and nature of the journey (e.g. to work, shop or for leisure purpose and also the time of day at which the journey takes place), and
  - characteristics of the transport mode (such as cost, convenience, accessibility,

waiting times, safety and reliability).

- 4.2.4 Mode share data at the London-wide, sub-regional and borough level can be accessed from the London Travel Demand Survey (LTDS) undertaken by TfL.<sup>4</sup> Boroughs and others are encouraged to:
- undertake more detailed analysis of travel behaviour in their town centres as part of regular health checks (see section 6.5), incorporating where possible mode share by journey purpose and
  - to use these findings along with future forecasts / identification of opportunities for change to inform spatial and transport planning strategies.

### Public transport

- 4.2.5 Improvements in public transport access to London’s town centres will be delivered through a range of transport projects and interventions identified by the Mayor in the London Plan and Transport Strategy. Major public transport scheme investments such as Crossrail, Thameslink Programme, Tube upgrades and further expansion of London Overground will yield substantial benefits for many town centres and act as a catalyst for growth and intensification. TfL’s Business Plan (updated annually) and the national rail HLOS investment programme detail the majority of committed investment in London’s transport infrastructure.
- 4.2.6 TfL, in partnership with the boroughs, have developed Sub-Regional Transport Plans which provide further detail on committed and potential transport enhancements and the challenges involved. Further schemes to improve

accessibility to London's town centres will be developed and implemented as opportunities and funding become available. The Mayor's Transport Strategy (MTS) provides some illustrative examples of further transport enhancement schemes the Mayor is seeking funding for over the long term (MTS, page 17). Furthermore, boroughs are defining and implementing individual transport enhancement programmes, for which the Local Implementation Plans process provides an element of funding.

4.2.7 Buses are the predominant means of public transport access to London's town centres, with record ridership which is expected to grow by 7% by 2020/21 broadly in line with London's population. Bus passengers need short, reliable journey times. Routings for buses in town centres should be direct and there should be bus stops very close to major shopping, civic and interchange destinations. Adequate space for waiting bus passengers is needed, especially in areas with a large volume of pedestrians. Bus station, interchange and terminal capacity (stopping and standing) is required, at or very close to places where bus routes need to start and finish (or interchange).

4.2.8 Boroughs, through their Local Plans and development control work, should provide active support for the bus network to, from and within town centres including highway layouts and infrastructure including accessible and inclusive stops, shelters, stands and stations with associated driver facilities. This should ensure that the bus access is located as conveniently as possible for key locations in the town centre and be

integrated with emerging development proposals to support growth.

### **Improving local connectivity by walking and cycling**

4.2.9 Local connectivity is a key determinant for the liveability of an area – as well as the economic health and vitality of town centres across London. Ensuring an attractive and walkable urban realm can make a significant positive impact on the local economy and local business. Furthermore, a shift from using a car to walking and cycling not only helps tackle road congestion and air pollution, it creates safer streets and also improves the health of those who make the switch.

4.2.10 The Mayor's Transport Strategy<sup>5</sup> (MTS) proposes to increase mode share for **walking** from 24 percent to 25 percent between 2006 and 2031. TfL research indicates that in some centres, those arriving by foot have relatively high levels of spend compared to travellers using other modes, with average spend per month at around £373 compared to £282 by bus and £226 by car<sup>6</sup>.

4.2.11 The Mayor has an aim to increase the **cycling** mode share (average across London) to 5% by 2026<sup>7</sup>. Research has identified significant potential to increase the proportion of trips to/from town centres that are cycled.<sup>8</sup> This is core to achieving the Mayor's cycling target. In line with the Mayor's Vision for Cycling in London<sup>9</sup>, the Mayor will work with TfL and boroughs to deliver a number of infrastructure projects to encourage cycling and improve the safety and amenity of London's streets. Boroughs have a crucial role in enabling

and supporting this vision. This includes realising the potential of town centres as cycle hubs with excellent cycle access from catchment areas and cycle facilities, including parking.

4.2.12 The Mayor's 'Mini-Hollands' programme aims to make up to four London boroughs as cycle-friendly as their Dutch equivalents with £100m of additional funding from TfL. The programme will improve conditions for cyclists through redesigning the relevant town centres to incorporate more cycling routes and improve cycle parking provision at key locations. The aim is to encourage far more people to cycle, especially for short journeys within the local area. This, in turn should contribute to a reduction in local pollution and noise, better health and quality of life and also economic regeneration.

4.2.13 Local connectivity can be improved by creating a network of key walking and cycling routes to and within town centres that will link them with existing and new neighbourhoods, the main public transport nodes and open spaces, waterways and green infrastructure. The emphasis should be on creating safe, accessible and attractive routes designed around pedestrians and cyclists. This can also help improve connectivity to town centres at a strategic level by linking into London's network of Strategic Walking Routes such as the Capital Ring, and at a local level by helping knit areas together through local walking routes or the Green Grid.

4.2.14 Measures to promote walking and cycling to/from town centres can include:

- mapping key local pedestrian and cycle routes to town centres from local neighbourhoods and from public transport nodes through built-up areas and green spaces, and consulting on improvements to these
- implementing 'better streets' - a practical guide to delivering physical improvements that raise the quality of the capital's streets (see section 3.1).
- identifying additional routes which might be needed to fully connect existing networks
- road access restrictions (e.g. bus, taxi and cycle only, or bus and cycle only)
- reducing speeds on the road network
- 'shared space' which reduces the segregation between motorists, pedestrians and cyclists to create a better place where people interact and share – proposals should take into account the needs of different user groups including older people, disabled people and children<sup>10</sup>
- installing improved wayfinding such as Legible London<sup>11</sup>
- sympathetic street design (high quality materials to reflect the existing design of the local area, etc.)
- reducing street clutter in town centres
- promotion to raise awareness of improvements to the urban realm and streetscape for pedestrians
- temporary road closures to promote the use of streets for events
- improving infrastructure in town centres to improve accessibility for pedestrians, including lighting, crossing design and dropped kerbs
- providing sufficient and high quality safe, secure and conveniently located cycle parking within the town centre especially at or close to key attractors and public transport nodes and the

promotion of high quality cycle parking (and associated facilities) at workplaces and residential developments in town centres (the London Cycle Design Standards give helpful specifications for cycling infrastructure<sup>12</sup> and Table 6.3 in the London Plan sets out minimum cycle parking standards for new developments).

- 4.2.15 The potential to make improvements to existing connections and to address problems of severance and route quality can be highlighted in town centre strategies. Local Plans should further:
- define these connections,
  - safeguard land where appropriate and
  - ensure that development proposals help to implement them.
  - identify opportunities for s106 and CIL to help deliver these benefits, without compromising viability.

### **Arrival points**

- 4.2.16 Improving the quality and accessibility of arrival points should be an important part of strategies to regenerate and sustain town centres. These arrival points might include rail, tube, tram, DLR and bus stations and interchanges, bus stops, park-and-ride facilities, car parks, cycle parks and taxi ranks/private hire drop off points. Other important arrival points (especially for those on foot) include the edge of centre locations/gateways to the town centre.
- 4.2.17 Local authorities should consider:
- how improvements to the quality or changes to the locations of these arrival points will influence behaviour patterns, overall use and pedestrian flows within the town centre
  - the relationship between arrival points

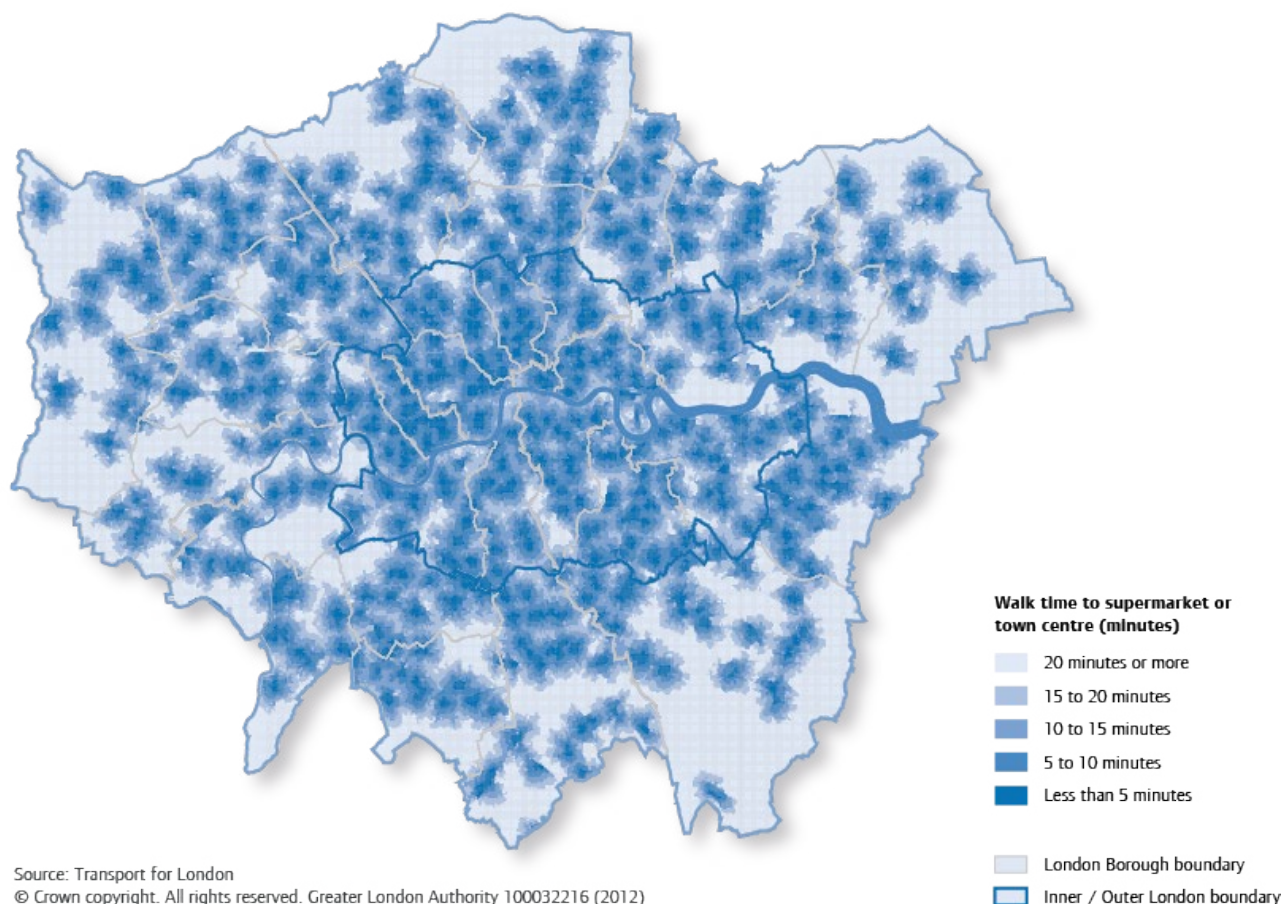
(by all modes of transport) and key attractors when devising strategies to regenerate secondary town centre areas

- the scope to promote higher density mixed use development at public transport nodes and interchanges in line with London Plan policies 2.15Cb, 4.7 and 6.1; and
- the quality of the environment and development of these edge of centre arrival points as well as the convenience, safety and accessibility of linkages to the centre of the town.

### **Access to Opportunities and Services**

- 4.2.18 Londoners are concerned not just about their ability to access the public transport network but crucially their ability to access key services and opportunities such as jobs, shopping, leisure, health and education. In outer and inner London, these services are often located within or close to town centres.
- 4.2.19 TfL has developed a number of tools and methodologies to measure the accessibility of an area or location or to services. The Access to Opportunities and Services (ATOS) methodology is designed to quantify the travel time to a basket of essential opportunities and services (for example education, GP surgeries, green open space and food shopping). Figure 4.2 illustrates the walk time to town centres/supermarkets.



**FIGURE 4.2 ACCESS TO NEAREST QUALITY FOOD SHOPPING**

4.2.20 The ATOS approach can be particularly relevant for local partners to:

- provide strategic context for more detailed local assessments of access to key opportunities and services
- inform strategies to improve access to these services and opportunities
- identify areas under-served by services such as local food shopping (see section 3.2)
- inform the development of lifetime neighbourhoods (see section 3.2) and
- assess accessibility to services and opportunities by different modes of transport (including public transport, walking, cycling and private car)
- support strategies promoting shifts in behaviour from the car to more

sustainable modes, especially for shorter trips.

#### **Inclusive access to town centres**

4.2.21 Access to key services and opportunities can be particularly challenging for disabled people. Given the high concentration of services and opportunities in town centres, improving the accessibility of town centres to disabled people will also improve their access to key services and opportunities. This will also provide wider accessibility benefits for example, for older people and people with prams or buggies.

4.2.22 TfL has published a report<sup>13</sup> that adds detail to the Accessibility

Implementation Plan as set out in the MTS which specifically considers priorities for further accessibility improvements to the transport system post existing funding commitments.

4.2.23 Local authorities should consider:

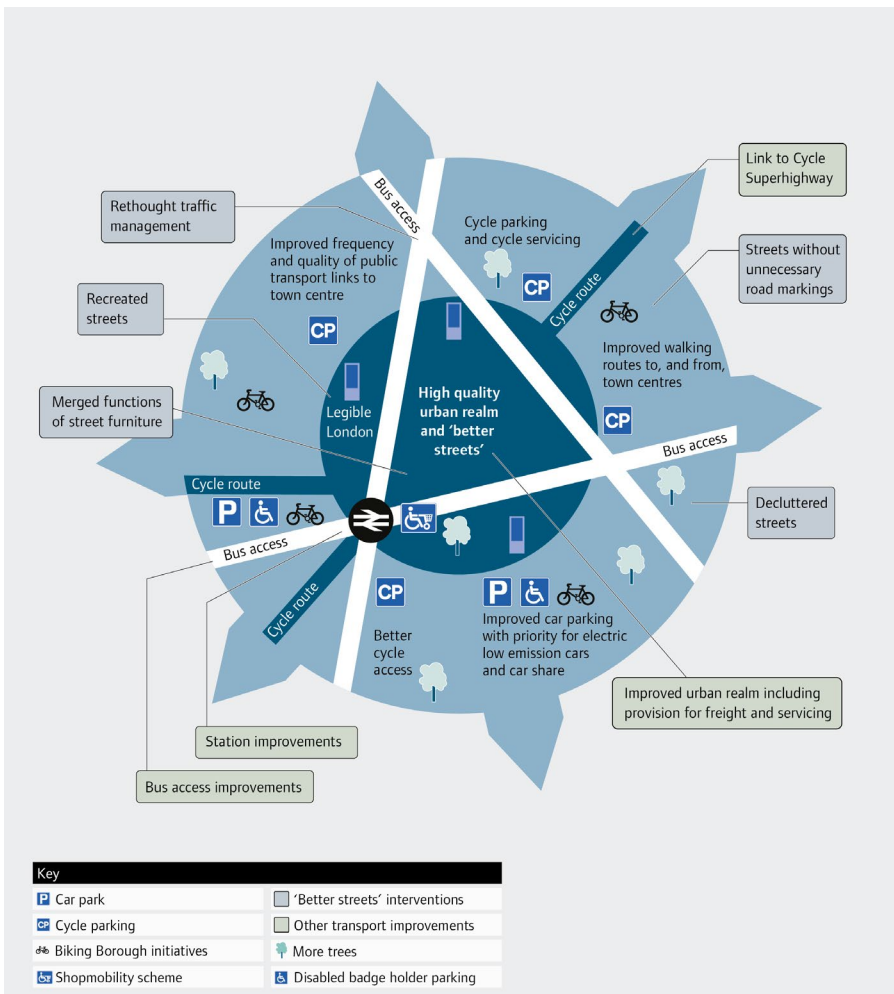
- inclusive access, availability, frequency, cost and quality of public transport
- the relationship between the public transport nodes (interchanges, stations, bus stops etc) and key locations in the town centre
- designated disabled persons parking
- inclusive access and synergies between improved town centre accessibility and improvements in public realm, and

- personal safety, and its perception.

4.2.24 Within town centres an inclusive environment and public realm (see SPG sections 3.1/3.3 and London Plan policies 7.2 and 7.5) should be complemented by initiatives to promote inclusive access on and to public transport, such as:

- accessible bus stops<sup>14</sup>
- step-free access at stations and interchanges
- better streets, including dropped kerbs
- the availability of Shopmobility schemes (see section 3.3) including satellite Shopmobility at nearby railway stations.

**FIGURE 4.3 ILLUSTRATIVE PACKAGE OF TOWN CENTRE ENHANCEMENTS**



## SPG IMPLEMENTATION 4.2 PROMOTING SUSTAINABLE TRANSPORT ACCESS TO TOWN CENTRES

Boroughs and town centre partners are encouraged to:

- a promote 'sustainable modes' and improve access and capacity to and from London's town centres including rail, tube, tram, DLR, bus and interchange development works through the implementation of transport schemes in the London Plan and Mayor's Transport Strategy
- b ensure the provision of sufficient land, suitably located, for transport functions in line with London Plan policy 6.2
- c draw upon TfL's Access to Opportunities and Services measure to inform strategic and local strategies to promote access to services located within town centres including neighbourhood and more local centres
- d improve the accessibility and inclusivity of town centres for communities including disabled and older people
- e enhance the availability of electric car charging points in town centres to help promote access and take-up of this emerging technology
- f examine the potential to make improvements to existing connections to town centres and address problems of severance
- g develop town centres as cycle hubs and promoting cycling as a sustainable choice of transport, with strong leadership role for boroughs
- h manage congestion on the strategic highway network in town centres through a number of complementary

- i put in place measures to encourage low car use to town centres, such as Smarter Travel programmes, personal, school and workplace travel planning, promotion of car clubs and car sharing.

## 4.3 ROAD NETWORK AND PARKING

### Balancing the different requirements on the road network

- 4.3.1 In London's town centres, balancing the variety and density of demands on the road network (often competing for the same space) is a major challenge. Different users such as commuters, shoppers, residents, tourists, construction, freight and servicing have different needs and priorities which must be identified, managed and reconciled in transport - and wider - strategies.
- 4.3.2 TfL is working with local authorities in London to develop and apply the street-type approach set out by the Mayor's Roads Task Force. Nine street types have been identified which can be used to help understand & articulate the challenges at any particular location or corridor.
- 4.3.3 London's strategic roads play an important economic role by supporting the movement of goods, services and people to and from town centres, but many street-types also play an

important role in terms of public space and the quality of place. The street-type approach should be used in the development of London town centre plans. Relevant guidance will be published later in 2014. In the interim, reference should be made to the RTF report (chapter 2<sup>15</sup>, annex 2<sup>16</sup> and supporting documents<sup>17</sup>, and the TfL response to the RTF report.

4.3.4 There are significant challenges in terms of increasing levels of congestion expected in inner and outer London over the period to 2031, with much of this increase concentrated in town centres. This increase is caused, mostly, by increased road use resulting from population and employment growth, and also by increased provision for walking, cycling and 'place' improvements.

4.3.5 This congestion needs to be tackled through a range of measures including:

- delivery of interventions to maintain an acceptable performance and the operation of the bus network.
- delivery of the public transport improvements set out by the Mayor's Transport Strategy
- increased application of intelligent systems and traffic management
- changing travel behaviour, reducing the number of short car trips and managing demand eg by increasing the proportion of out of hours goods deliveries, greater use of car clubs, 'car lite' development
- considering development proposals' impact on the highway network and providing interventions within proposals to mitigate impacts
- greater flexibility in the use of road space eg to allow for different uses over the course of the day/evening/night,

or between different days of the week, and the provision of more space (subject to criteria set out by Proposal 35 of the MTS).

### **Travel planning**

4.3.6 Travel planning can help encourage low car use and also reduce the need to travel. Smarter Travel programmes such as those run by TfL and boroughs in Sutton and Richmond upon Thames, have been successful in encouraging more sustainable modes. The scheme uses a range of measures – personal, school and workplace travel planning, promotion of car clubs and car sharing – to encourage people to choose public transport, walking and cycling. To ensure continued success it is important to 'lock in' the benefits of the scheme, otherwise suppressed demand will reclaim the road capacity. Monitoring should be a key part of successful travel planning.

### **Car Parking**

4.3.7 Good accessibility to and from town centres is essential if they are to remain successful and this includes access by car. The Mayor seeks an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use (London Plan policy 6.13) whilst providing adequate levels of designated disabled persons parking.

4.3.8 London Plan car parking standards provide flexibility for outer London (policy 6.13Ec,d) to ensure they can be tailored at a local level to meet the needs of individual town centres, reflecting different characteristics and public transport accessibility levels, for

example. When planning for car parking, local authorities should take into account the following considerations:

- making most effective use of scarce town centre land
- encouraging use of walking, cycling and public transport and reducing car dependency, particularly for short journeys
- parking standards should not disadvantage outer London town centres and SOLDCs (see section 7) in competition with the wider South East.

4.3.9 The approach to car parking in new developments can form an important part of a package of measures to manage demand and encourage more sustainable travel to London's town centres and reduce congestion. It can also affect patterns of development, play an important part in the economic success and liveability of town centres, enable better design and landscaping and allow higher density development.

4.3.10 In central and Inner London where public transport accessibility in town centres is high or, for example, where boroughs aspire to be 'mini Hollands'<sup>18</sup>, car parking levels should be low and car free or car-lite development should be promoted, providing the needs of disabled people and families are still met.

#### **Implementation of car parking policy in outer London**

4.3.11 The accessibility and character of each town centre should therefore inform parking provision and the application of policy in the area. Other considerations should also include congestion and public health.

4.3.12 Drawing on the recommendations of the OLC<sup>19</sup> the following guidance is provided:

- London Plan parking policy 6.13 should be flexible and responsive to local circumstances in line with the NPPF (paragraphs 39-40)
- London Plan parking policy 6.13C and the car parking standards in Table 6.2 should be read in the context of 6.13A and where relevant with other policies and especially 2.6-2.8 on Outer London Boroughs and the GLA including TfL should ensure that their development management processes do not lead to parking being considered in isolation from wider planning concerns.

#### **Town centre parking policy**

4.3.13 Where there are identified issues of town centre vitality and viability, Policy 6.13E(c) provides for a more flexible approach to the provision of public car parking to serve the town centre as a whole and support its regeneration. In these circumstances, boroughs are encouraged to:

- note the flexibility already provided for outer London by the Plan's town centre parking policies including the scope they provide to enhance the competitive offer of town centres relative to out of centre retail and leisure locations and other centres with more liberal parking regimes
- draw on Annex 2 to the London Plan which identifies future potential growth and centres in need of regeneration and identify other centres which, from a local perspective, need regeneration
- review parking standards in non-residential, strategic shopping areas and town centres to reduce any negative impact on businesses while avoiding adverse impacts on congestion.



- 4.3.14 Measures should be evidence based (for example through car park/street utilisation surveys) and could include:
- reduced or zero parking charges at different times of year, day and/or week to reflect the need to manage spaces/ congestion
  - designing car parks attached to an individual site so that they can serve the town centre in a broader sense
  - enabling high turnover short stay parking close to convenience/local stores (including at local shopping parades) or
  - increased overall provision of car parking in a town centre if there is evidence of a lack of overall capacity which is harming vitality and viability.

- 4.3.15 Enhance town centre viability by considering:
- the quality and location, as well as the quantity, of parking provision including for blue badge holders, motorcycles and pedal cycles
  - the importance of convenience, attractiveness, safety and security – for both the car parks and the links between them and town centre uses
  - the potential for sharing parking allocated to shopping malls and major town centre uses (including and edge-of-centre retail uses) with the town centre as a whole (see London Plan paragraph 6A.4)
  - using s106 agreements to secure appropriate parking management regimes, thus encouraging ‘linked trips’ and minimising the need for car based travel
  - supportive parking management regimes, setting charges that do not undermine the vitality of the centre, while avoiding wider impacts on congestion
  - sensitive management arrangements

for parking (and servicing) taking into account the different requirements of primary and secondary shopping areas.

- 4.3.16 Adequate parking for disabled people i.e. designated disabled persons blue badge parking, backed by effective enforcement, should be an integral part of town centre parking policies.<sup>20</sup> Parking for disabled people must reflect at least the minimum standards set out in London Plan Table 6.2.

### **Short stay parking**

- 4.3.17 The Mayor supports the concept of short-term free parking in convenient locations to access local retail and service providers as a means of stimulating footfall, in particular to support the viability of small retail businesses in town centres, particularly those in secondary frontages, in small centres and those in need of regeneration. He has increased the time motorists can park in “Stop and Shop” bays on TfL roads to support local businesses. Boroughs can consider a similar approach in connection with non-TfL roads where appropriate and necessary. A balanced and carefully managed policy to short stay parking is essential to ensure that there are no adverse economic impacts on town centres arising from congestion.

### **Office parking**

- 4.3.18 The lack of adequate parking is highlighted as a key contributor to the difficulties outer London’s town centres and office locations face in maintaining existing, and attracting new office development and occupiers<sup>21</sup>. It is one factor that may put outer London at a disadvantage in attracting businesses

relative to neighbouring locations beyond the GLA area. The Outer London Commission noted also the considerable differential in office parking standards either side of the London boundary<sup>22</sup>.

4.3.19 London Plan Policy 6.13Ed seeks to make the link between the Plan's policies to realise Outer London's potential and those concerned with office parking. The standards span a wide range (1 space per 100 – 600 sq m) to take into account differences in local circumstances with scope to go up to 1

space per 50 sq m if this can be justified through the process set out in policy 6.13Ed. To assist in the interpretation of policy 6.13Ed TfL can provide practical support to boroughs in conducting assessments, for example by sharing analysis of public transport access or congestion levels (see Figure 4.4). A more detailed matrix of factors which TfL suggests should be taken into account is set out in Appendix D.

**FIGURE 4.4 POTENTIAL DATA TO SUPPORT OFFICE PARKING ASSESSMENTS IN OUTER LONDON**

Regeneration	The Index of Multiple Deprivation
	London Plan Table A2.1 which lists town centres in need of regeneration
	Designation as a brownfield site in need of regeneration
	Designation in borough Local Plan
Congestion	Level of congestion in the vicinity (eg using TfL's Greater London Congestion Hotspots map)
	Likely traffic generation
Public transport access	PTAL band of location
Potential improvements to walking, cycling and public transport	Mayor's Transport Strategy, borough LIPS and TfL Business Plan
Available parking	Assessment by borough
Provision for disabled parking, cycles, car club, and electric vehicles above minimum levels	Demonstrated in relevant application
Requirement to reduce provision over time	Demonstrated in relevant application

### Electric Vehicle Infrastructure

4.3.20 Publicly accessible town centre parking should meet the London Plan’s retail standards for provision of electric vehicle charging infrastructure (10 per cent of spaces with ‘active’ provision and 10 per cent with ‘passive’ provision)<sup>23</sup>. Accessible charging points in town centres will help promote access and take-up to this emerging technology. The Mayor’s Land for Industry and Transport SPG<sup>24</sup> provides guidelines on electric vehicle charging infrastructure at new London developments.

#### SPG IMPLEMENTATION 4.3 ROAD NETWORK AND PARKING

Boroughs and town centre partners are encouraged to:

- a draw on London Plan policies on parking (policy 6.13C) and outer London (policies 2.6-2.8); and NPPF principles, especially paras 39–40, to support flexible application of strategic policy in the light of local circumstances in outer London
- b note the flexibility already provided by the Plan’s town centre parking policies including the scope they provide to enhance the competitive offer of town centres relative to out of centre retail and leisure locations and other centres with more liberal parking regimes
- c ensure that development management processes do not lead to parking being considered in isolation from wider planning concerns
- d consider the potential of parking allocated to shopping malls and other major retail and leisure uses for sharing with the town centre as a whole

- e ensure that inflexible application of parking standards should not compromise the potential of the London Plan office locations to contribute to the London economy
- f ensure that the approach to residential development in town centres reflects the need for reduced car dependency to help maximise densities, reduce congestion impacts and support more sustainable travel patterns.

## 4.4 TOWN CENTRE DELIVERIES AND SERVICING

#### EXTRACT FROM POLICY 2.15 TOWN CENTRES

- C Development proposals in town centres should:
  - h reduce delivery, servicing and road user conflict

#### EXTRACT FROM POLICY 4.8 SUPPORTING A SUCCESSFUL AND DIVERSE RETAIL SECTOR

- f support the development of e-tailing and more efficient delivery systems.

#### EXTRACT FROM POLICY 6.14 FREIGHT

- Bb locate developments that generate high numbers of freight movements close to major transport routes

- 4.4.1 The efficient distribution of goods and services is essential for successful and sustainable town centres. Increases in the density of commercial and residential development in town centres will require logistics facilities to support the associated demand in freight and servicing.
- 4.4.2 Managing the demands and impacts of delivery and servicing is an essential part of the package of delivering growth in town centres. Safe and efficient loading arrangements and spaces should be accommodated within centres to meet current and future demand for both businesses and residents.
- 4.4.3 The Mayor and his partners need to ensure that the distribution of goods and services reduces adverse effects on local amenity and the wider transport network, as a large proportion of these movements will be by road. Road network designs and redevelopment schemes should ensure that the potential for conflict with other users (either on the kerb or the road) is minimised (including cycle routes). Local Authorities and businesses are encouraged to make use of guidance (see appendix G) issued by TfL to freight operators regarding safe and legal parking and unloading, and the design of kerbside loading facilities. Freight impact assessments (such as the Street Audit: Freight module, formerly known as the Freight Environment Review System) are promoted. Other considerations include:
- the design and layout of development
  - the use of planning conditions and section 106 obligations relating to the impact of the development on traffic flows and congestion in peak and off-peak periods, and on the amenity of neighbouring residents, such as through the timing of the delivery of goods and the adequate provision for loading and unloading (eg through Delivery and Service Plans and management of construction traffic)
  - the development and application of standards relating to noise created by delivery vehicles and during the process of loading and unloading
  - providing suitable facilities off-street for loading and unloading where possible (to avoid conflicts between vehicles loading and unloading on-street and other traffic to reduce congestion and improve safety and security)
  - providing facilities in inset bays, allowing more flexible use of the space available
  - opportunities for consolidation of freight.
- 4.4.4 The development of multi channel retailing can be tailored to support town centres through marketing and opening up access to goods and services in-store. Local measures to facilitate home deliveries should be provided, including delivery service planning. The scope for developers to incorporate internet-related delivery collection premises in town centre sites, retail stores and close to public transport nodes should be explored.
- Re-timing deliveries**
- 4.4.5 Out-of-hours delivery and servicing in town centres can help encourage a greater proportion of freight to travel when roads are quieter, with greater spare capacity to accommodate goods vehicles in transit, and also those loading or unloading on street. However this must be balanced against the needs of

residents in the vicinity and appropriate mitigation measures against potential noise disturbance effects should be sought<sup>25</sup>. Measures, which must be enforced by environmental health teams to ensure their effectiveness, can include:

- ensuring new building layouts are designed to reduce noise of deliveries and other activity for local residents
- use of quiet technology,
- improved working practices and
- provision of suitable infrastructure.

4.4.6 The Quiet Deliveries Demonstration Scheme<sup>26</sup>, undertaken by the DfT, includes guidance to local authorities and retailers. Benefits included more reliable journey times, reduced fuel consumption and increased staff productivity. However, in some instances costs were prohibitively large – e.g. altering staff shift patterns. The study found vehicle noise (manoeuvring, engine idling, etc.) to be greater than the noise of loading and unloading activity. Flexibility is needed – mitigation measures need to be specific for each site. Good communication between all parties is important, including enabling residents to easily report any instances of noise disturbance. In the case of new development, good design (layout and materials) can reduce the potential for retail activity to cause noise disturbance for local residents.

4.4.7 Both the ‘Delivering a Road Freight Legacy, Working together for safer, greener and more efficient deliveries in London’ and the ‘Olympic Legacy Monitoring: Adaptations to deliveries by businesses and freight operators during the Games, Travel in London

Supplementary Report<sup>27</sup> provide greater clarity as to those measures which are feasible and can be delivered without causing disruption to local residents and businesses, whilst improving economic efficiency and improving environmental performance.

4.4.8 The Olympic Legacy monitoring shows that 41 per cent of businesses and 45 per cent of freight operators in affected areas made or received deliveries outside normal working hours during the Games. Pre-ordering and pre-delivery and changing delivery and collection times were the most popular re-timing measures for businesses. Popular ‘re-timing’ measures amongst freight operators included change of delivery and collection time and conducting operations out of hours. This helped businesses to avoid the impacts of road restrictions and reduce the impact of their activities on Games-time traffic.

4.4.9 To help reduce the effect of out-of-hours delivery activity on local residents TfL developed a Code of Practice<sup>28</sup> which contained a list of practical behavioural measures for use by freight operators and also those firms receiving deliveries. Local authorities are encouraged to use the Code of Practice to work with businesses to enable them to understand the role their suppliers and customers can have in enabling a retiming of delivering activity. TfL is reviewing the Code to ensure that it stays up to date and relevant for future use.

4.4.10 TfL leads a consortium of London boroughs, major retailers and industry representatives that looks at issues around out-of-hours deliveries. Created

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in October 2013, the group aims to demonstrate best practice, and offer guidance on collaboration and new ways of working. Progress reports and additional guidance material will be made available online<sup>29</sup> over the course of the Legacy Road Freight Programme.

- 4.4.11 TfL has also commissioned a series of trials to better understand: Quiet delivery technology; delivery-time restrictions imposed by local authority planning conditions and how quiet delivery practices can be sustained in the long-term. The trials will be completed by early 2015 and also published online.

#### **Micro-consolidation**

- 4.4.12 Over the London Plan period, the concept of micro-consolidation centres (delivery by large vehicle, and onward distribution by smaller, highly sustainable vehicle) may become more well-established in London's town centres owing to their environmental and congestion benefits. This 'last mile' concept can include the use of cargo bicycles as well as electric vehicles or foot. However their success depends on finding a cost-efficient model and having sufficient land availability (including basements or other storage locations close to where deliveries take place).

#### **SPG IMPLEMENTATION 4.4 TOWN CENTRE DELIVERIES AND SERVICING**

Boroughs and town centre partners are encouraged to:

- support the efficient distribution of goods and services to town centres and resolve tensions related to the impact of the development on traffic flows and congestion and the amenity of neighbouring residents.

## ENDNOTES

<sup>1</sup> See MTS policy 6 and 2013 London Town Centre Health Check, GLA 2014 and London Travel Demand Survey

<sup>2</sup> London Town Centre Health Check, GLA 2014

<sup>3</sup> London Town Centre Health Check, GLA 2014

<sup>4</sup> [www.tfl.gov.uk/ltlds](http://www.tfl.gov.uk/ltlds)

<sup>5</sup> Further guidance is set out in the MTS at p.197 'Making Walking Count'

<sup>6</sup> TfL, Bus and Town Centres Report 2011

<sup>7</sup> Mayor's Transport Strategy

<sup>8</sup> <http://www.tfl.gov.uk/assets/downloads/roadusers/Cycling/analysis-of-cycling-potential.pdf> (Figure 2.5 p.19)

<sup>9</sup> Mayor of London/TfL. Mayor's Vision for Cycling in London, GLA, 2013

<sup>10</sup> See Draft Accessible London SPG, 2014

<sup>11</sup> TfL, Legible London, <http://www.tfl.gov.uk/microsites/legible-london>

<sup>12</sup> TfL, London Cycle Design Standards, <http://www.tfl.gov.uk/businessandpartners/publications/2766.aspx>

<sup>13</sup> <http://www.tfl.gov.uk/assets/downloads/corporate/taking-forward-the-mts-accessibility-implementation-plan-march-2012-final.pdf>

<sup>14</sup> See TfL Design Guidance for more detail: Transport for London, Mayor of London, Accessible bus stops design guidance, January 2006

<sup>15</sup> <http://www.tfl.gov.uk/cdn/static/cms/documents/rtf-report-chapter-2-part-1.pdf>

<sup>16</sup> <http://www.tfl.gov.uk/cdn/static/cms/documents/rtf-report-annexes.pdf>

<sup>17</sup> <http://www.tfl.gov.uk/cdn/static/cms/documents/londons-street-family-chapters-1-2.pdf>

<sup>18</sup> See paragraph 4.2.12

<sup>19</sup> The Outer London Commission. Second Report. GLA 2012

<sup>20</sup> Standards for Blue Badge Parking can be found in Table 6.2 of the London Plan, page 204

<sup>21</sup> Ramidus Consulting Ltd with Roger Tym & Partners. London Office Policy Review, GLA 2009

<sup>22</sup> The Outer London Commission. Second Report. GLA 2012

<sup>23</sup> See London Plan 2011 Policy 6.13 and the Mayor's Electric Vehicle Delivery Plan for London, 2009

<sup>24</sup> Mayor of London. Land for Industry and Transport Supplementary Planning Guidance. Annex 6

<sup>25</sup> See also Mayor's Ambient Noise Strategy

<sup>26</sup> <http://www.dft.gov.uk/publications/quiet-deliveries-demonstration-scheme>

<sup>27</sup> <http://www.tfl.gov.uk/cdn/static/cms/documents/delivering-a-road-freight-legacy.pdf>  
<http://www.tfl.gov.uk/cdn/static/cms/documents/olympic-legacy-freight-report.pdf>

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<sup>28</sup> <http://www.tfl.gov.uk/assets/downloads/code-of-practice-out-of-hours-deliveries-and-servicing.pdf>

<sup>29</sup> <http://www.tfl.gov.uk/info-for/freight/moving-freight-efficiently/retiming-and-out-of-hours-deliveries>

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ellers

JEWELLERY & WATCHES

216AB

214

**FOOD CHOICE**  
FOOD AND DRINKS FOR ALL TASTES

214A&B

212

Person walking on the sidewalk.

Person walking on the sidewalk.

Person walking on the sidewalk.

Person pushing a stroller on the sidewalk.



## 5. TOWN CENTRE REGENERATION AND INITIATIVES

5.0.1 The strategic principles in this SPG to support the diversification and housing intensification of centres in line with London Plan policies 2.15Cb and Cc, alongside improvements to quality and accessibility, will help to drive footfall, town centre viability and regeneration. This section sets out complementary measures to support town centre renewal including the Mayor's Action for High Streets, planning for Regeneration Areas and Opportunity Areas, together with other sources of funding and initiatives including Business Improvement Districts.

### 5.1 REGENERATING TOWN CENTRES

#### Mayor's Action for High Streets

5.1.1 The Mayor wants to make London an even better place to live and work. To do this town centres and high streets need to be hard working, resilient, innovative and growing. This is why the Mayor is investing £175 million in bolstering London high streets. A range of Mayoral actions and achievements to date are captured below. The Mayor is looking at the case for further investment and propositions for future regeneration activity.

#### Regeneration funding

5.1.2 The Mayor is complementing local initiatives by investing in regeneration across London, to improve town centres and associated high streets, protect

existing jobs as well as delivering new growth and new jobs. This investment includes:

- **Outer London Fund (OLF)** (£50 million) A three year initiative launched in June 2011 to strengthen the vibrancy and growth of town centres, high streets and their local areas. The fund is being used to support proposals that are deliverable and demonstrate a holistic approach to making better places; unlock barriers to growth and create economic uplift; and celebrate and improve the quality of local life by creating thriving hearts of London's diverse places.
- **Mayor's Regeneration Fund (MRF)** (£50 million) Eight boroughs will benefit from the Fund which is designed to help make major long-term improvements to the capital's town centres and high streets damaged by the riots in 2011. These include Croydon, Haringey, Camden, Ealing, Enfield, Hackney, Merton and Southwark. Business cases have been developed for each project which identify the core aims and objectives of the project and the measures of success. These measures will be monitored throughout the course of the projects as appropriate.
- **London Enterprise Fund** (£20 million) supplements the Mayor's Regeneration Fund Programme and is designed to fund major regeneration of Tottenham and Croydon, two of the worst hit areas in the 2011 riots.
- **External funding** (of at least £57 million) has been raised in match funding from other private and public sector partners.
- **Growing Places Fund** (£41 million) secured from the Government to boost economic growth by getting the required infrastructure built to enable the creation



of new homes and jobs and get stalled projects moving again. This fund is being overseen by the London Enterprise Panel.

### **Portas pilots and town teams**

5.1.3 The Government supported Mary Portas' recommendations to set up Town Teams and to give communities the opportunity to pilot creative plans for the future of their town centres. In London, Portas Pilots include Croydon town centre, Waterloo (Lower Marsh and the Cut), Forest Hill, Kirkdale and Sydenham (London Borough of Lewisham) and Chrisp Street, Watney Market and Roman Road (Tower Hamlets).

5.1.4 In addition there is the Government High Street Innovation Fund (which has benefited Herne Hill market in south London) and the Future High Street X-Fund to reward the areas delivering the most effective and innovative plans to bring their town centres back to life.

### **Knowledge Exchange**

5.1.5 There is great potential for sharing of knowledge and good practice in town centre development. The ATCM, British Council of Shopping Centres, the British Retail Consortium and the British Property Foundation are working to offer advice and mentoring of the successful Town Team pilots. The Local Government Association will offer both successful and un-successful areas access to a single online platform<sup>1</sup> to share information and knowledge. The Mayor hosts regular High Street Network Events for recipients of regeneration funding.

5.1.6 In London the Portas Pilots have been incorporated under the umbrella of the OLF and MRF interventions. This will mean that the London Pilots are invited to High Street Network Events to ensure that learning is being captured and good practice shared across high streets. Additional signposts can be found in Appendix G of this SPG).

### **Regeneration Areas and Opportunity Areas**

5.1.7 When planning for town centre investment in Regeneration Areas (London Plan policy 2.14) and centres in need of regeneration (London Plan Annex 2), local authorities are encouraged to:

- co-ordinate action across a broad front of economic, education and training, housing, social, transport, security, heritage, development and environmental measures to support town centre renewal
- consider the scope for residential-led and (where there is evidence of demand) retail-led town centre regeneration on town centre sites and well integrated edge-of-centre sites that best serve the needs of Regeneration Areas, including the potential for additional employment<sup>2</sup>
- work collaboratively with the private sector and other stakeholders to develop policies and proposals to secure investment in town centres or other areas in need of regeneration
- strengthen provision and sustainable access to existing town centres including neighbourhood and local centres
- identify under-served areas and develop strategies to address these (section 3.1)
- consider a more flexible approach to car parking to serve outer London town centres in need of regeneration (section 4.2).

5.1.8 Town centre strategies and planning frameworks for the **Opportunity Areas** should:

- consider the potential to regenerate and accommodate growth in commercial and residential development in these centres, appropriate to their role and function in the town centre network
- utilise existing capacity in centres in need of regeneration to secure physical, environmental and economic renewal
- consider any changes to the role and function of centres through the development plan (see section 6.2)
- take account of public transport provision and capacity in the town centre
- indicate the potential for new neighbourhood and local centres to serve existing and new development and, in particular, to be the focus for local place shaping in new large residential developments.

### SPG IMPLEMENTATION 5.1 REGENERATING TOWN CENTRES

Boroughs and town centre partners are encouraged to:

- a work collaboratively with the private sector and other stakeholders to develop policies and proposals to secure investment in Regeneration Areas including town centres in need of regeneration, by strengthening and/or identifying opportunities for sustainable growth and intensification of centres, including for residential development and improving access to local facilities
- b secure new neighbourhood retail and service provision in large residential developments and as a focus for local place shaping in major development locations including Opportunity Areas

- c ensure that planned investments through the Outer London Fund, Regeneration Fund, London Enterprise Fund and the Growing places Fund is integrated with wider town centre objectives
- d capitalise on the investment and opportunities to share learning experiences from projects supported by the Mayor's regeneration programmes and the Portas Pilot Town Teams.

## 5.2 BRINGING VACANT AND UNDER-USED SITES AND PROPERTIES BACK INTO USE

- 5.2.1 Vacant properties can lead to a spiral of decline, engender feelings of neglect and lack of confidence in town centres, and act as a magnet for crime and anti-social behaviour. Redeveloping and bringing vacant and under-used sites and properties back into use can help stimulate vitality and economic viability, and kick-start local growth<sup>3</sup>. Dealing with brownfield land or contaminated land in town centres can help unlock sites for development, encouraging sustainable investment and growth.
- 5.2.2 Evidence from Experian and the 2013 London town centre health check<sup>4</sup> indicates that in parts of the capital there are significant levels of vacant retail floorspace in town centres. Where these surpluses are identified it will be important to consider alternative uses and options for redevelopment.
- 5.2.3 Boroughs, town centre managers and their local partners should take swift and positive actions to address the issue of empty properties. Measures to

reduce the number of vacant units might include:

- supporting redevelopment to provide improvements to the quality and configuration of ground and upper floor space to meet identified needs and capturing opportunity to secure housing intensification drawing on London Plan policy 2.15Cb
- securing space to meet identified demand for small businesses including on upper floors where appropriate
- securing temporary or ‘meanwhile’ uses of vacant properties (see paragraphs 5.2.6-5.2.8) including ‘pop-up’ shops
- providing flexibility for temporary planning permissions<sup>5</sup> and for new permanent uses including changes of use.

#### Temporary uses of vacant premises

- 5.2.4 Enabling temporary uses of vacant premises can ensure town centres remain active, attractive places and offer real advantages to landlords, such as covering expenses such as security costs, utility bills and insurance and avoidance of empty property business rates.
- 5.2.5 Temporary uses can include a range of different purposes such as new business start-ups, community enterprises, art studios and galleries, creative space for rehearsal and creation, community learning opportunities, access to local information and services, farmers’ or crafts markets, community/ youth centres, or as a way to display information about local attractions or community art.<sup>6</sup>

#### CASE STUDIES - POP-UP SHOPS AND TEMPORARY USES

**Camden Town Unlimited** working with local landlords to make use of their empty retail space, whilst also providing a platform for creativity on the High Street  
<http://www.camdentownunlimited.com/projects/pop-shops>

**Brent** has developed a partnership with the Meanwhile Foundation, whereby the charity takes on the lease of empty shops, which then benefit from charitable business rate relief, for organisations to use them on a temporary basis  
<http://www.meanwhile.org.uk/>

**Tower Hamlets** Pop Shop Grant Scheme supporting creative and innovative use of empty properties [http://www.towerhamlets.gov.uk/lgs/901-950/914\\_pop\\_up\\_shop\\_grants.aspx](http://www.towerhamlets.gov.uk/lgs/901-950/914_pop_up_shop_grants.aspx)

#### Temporary and ‘Meanwhile’ Leases

- 5.2.6 “Meanwhile leases” facilitate temporary occupation of empty buildings while a permanent solution is being found. Adopting this principle, the social enterprise Meanwhile Space has transformed a vacant retail unit in Exmouth Market (Clerkenwell) into a hub offering space to business start-ups and community-based projects. Through Meanwhile, local authorities can access information and guidance on temporary leases, insurance, grants and other measures to bring empty units back into use<sup>7</sup>.
- 5.2.7 Boroughs are encouraged to take an intermediary role between a landlord and temporary occupier. It may be

possible for a borough to agree a temporary, or 'meanwhile' lease with a landlord and granting an interim licence to a local group for community uses. Landlords need assurance that the arrangements for temporary uses are legally sound, that their properties will be managed and kept in good condition and that there is flexibility to take the empty premises back promptly when a commercial letting is secured.

- 5.2.8 Further guidance and support on the transfer of under-used land and buildings from the public sector to community ownership and management can be obtained from the Asset Transfer Unit (ATU)<sup>8</sup>, an independent service, funded by CLG and led by the Development Trusts Association.

### **Flexibility for new permanent uses including changes of use**

- 5.2.9 In local plan policies or through Local Development Orders (LDOs), boroughs can choose to provide greater flexibility for changes of use in areas with a high level or proportion of vacant or difficult to let units, particularly in secondary frontages. This may help town centres to adapt to changes in the economy, consumer behaviour or spending patterns and could be linked to initiatives to support local or start-up businesses.

### **Increasing activities in vacant/under-used public spaces**

- 5.2.10 Vacant and under-used public spaces can be animated with activities or performances by local community/voluntary groups and local businesses. Part 4 of the Town and Country Planning

(General Permitted Development) Order 1995 (GDPO) allows temporary use of land for up to 28 days in any calendar year (14 days for local markets) without need for planning permission, subject to restrictions and conditions. These powers could be used to enable vacant or under-used land to be used for a wide variety of short-term events and activities. The range of licensing powers can be used to facilitate and regulate uses and activities such as entertainment, festivals, live performances (such as musicians, dancers, circuses, theatre) and markets. Performers only need to get permission from the local authority rather than going through a full licensing process. All licensed spaces should be registered so that performers and organisations are aware of them. Local authorities can access further advice from the Institute of Place Management<sup>9</sup>.

### **SPG IMPLEMENTATION 5.2 BRINGING VACANT AND UNDER-USED SITES AND PROPERTIES BACK INTO USE**

Boroughs and town centre partners are encouraged to:

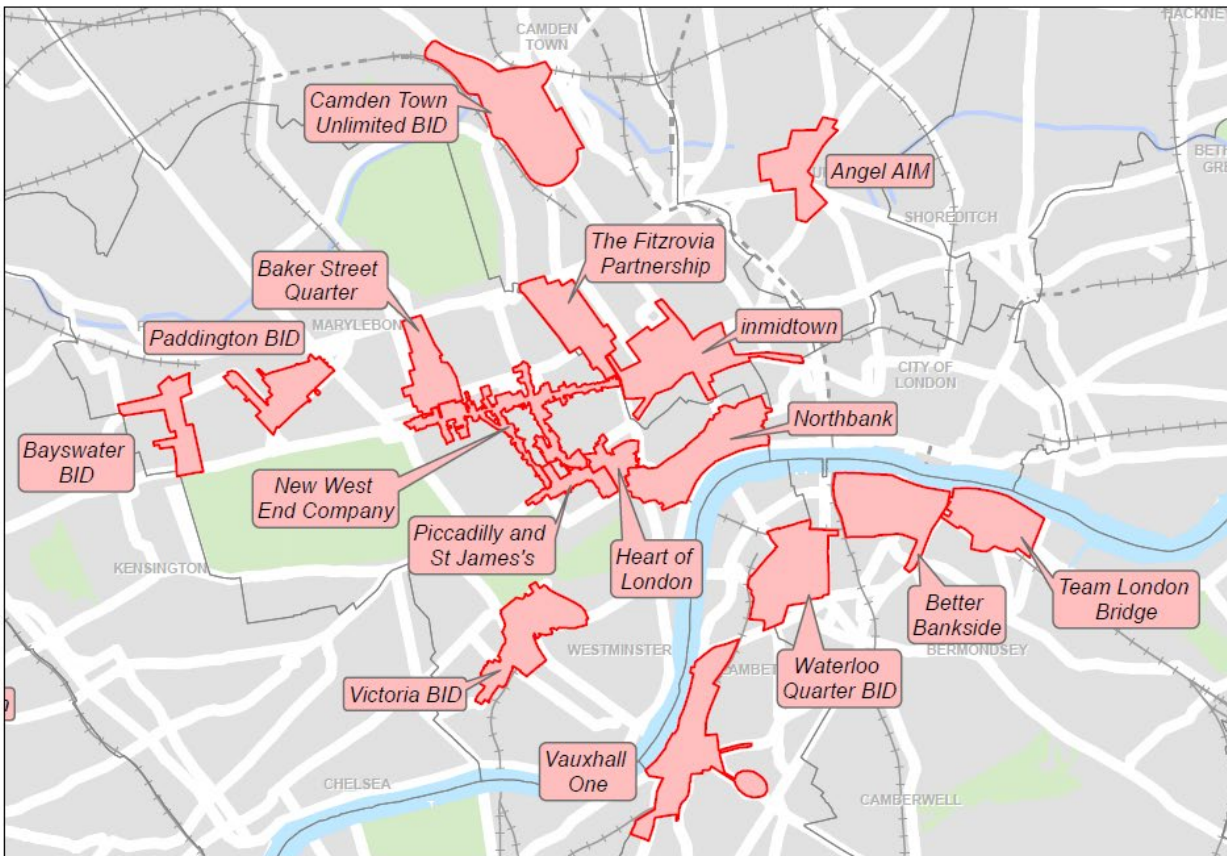
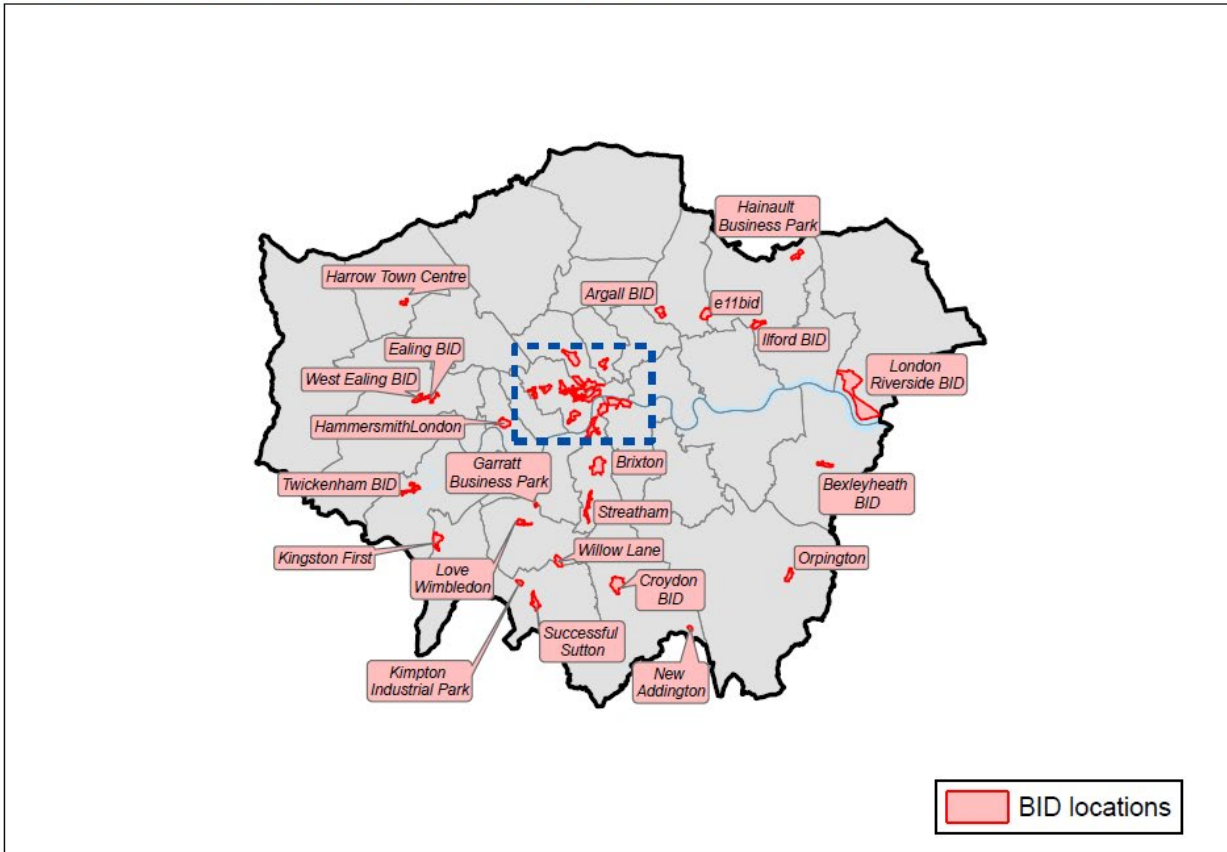
- a bring vacant/under-used properties back into use to help stimulate vitality and viability, promote diversity and choice, deliver new homes, boost town centre attractiveness and kick-start local growth
- b adopt a more flexible approach to secure temporary uses of vacant premises including the use of temporary permissions, Local Development Orders and "meanwhile leases".

### 5.3 BUSINESS IMPROVEMENT DISTRICTS

- 5.3.1 The Mayor strongly endorses the concept of Business Improvement Districts (BIDs) and their role in the 'place shaping' of local town centres and industrial estates. BIDs are precisely defined geographical areas within which the businesses have voted to invest collectively in local improvements to enhance their trading environment. BIDs are supported in the London Plan (Policies 2.7Af and 2.15Dd) in recognition of their value in town centre management and promoting safety, security and environmental quality in London's centres.
- 5.3.2 Business Improvement Districts can foster innovative partnership working to:
- stimulate investment in the designated area
  - improve communications (eg Better Bankside raising awareness of major infrastructure projects affecting the area) or
  - tackle specific issues (such as the New West End Company tackling smash and grab robberies in the West End and Victoria BID adopting an innovative model to foster a safe and secure environment)
  - strive to deliver cost effectiveness and money-saving benefits for businesses (for example Paddington BID which introduced a commercial recycling scheme)
  - engage with local communities in addressing local needs and/or enabling local businesses to do so (for example a community forum to tackle social needs in Westminster by the New West End Company)
- increase the visibility, stature and overall identity of an area (a recent example is Camden Town Unlimited with its 'pop-up' shops initiative).
- 5.3.3 support the curation and delivery of festivities and events within BIDs to increase engagement and provide high quality animations and cultural projects (examples from the Mayor's Summer Like No Other in 2012 include Piccadilly Circus Circus and partnerships with Showtime (Hammersmith, Ealing, Croydon, Bexleyheath and Wimbledon).
- 5.3.4 To understand and be able to support better London BIDs, the GLA commissioned in 2013 research to identify what makes BIDs successful, look for improvements in running BIDs, and recommend how knowledge and expertise can transfer from existing BIDs to new and putative ones. Although there is recognition that BIDs are not the only option, supporting BIDs is closely linked to the current projects the Mayor is funding through the Outer London Fund and Mayor's Regeneration Fund - where embryonic organisations are flourishing and could potentially develop to become more formal membership groups such as BIDs.
- 5.3.5 Some of the outcomes of the research (based on 30 BIDs at that time) include:
- London BIDs contain over 32,000 firms (7.6% of London total) and create over £72 billion in turnover generated by business (8.2% of London's total business turnover)
  - Over 475,000 people employed (11.3%) of total London's employment
  - BIDs raise more than £20 million levy per year which is invested directly into their



### Business Improvement Districts - April 2014



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BID area

- BIDs across London are very different and it is important to recognise their particular characteristics
- Average levy income in London £638,000. The smallest is £40,000 in Argall and £3.4m in NWECC
- BID areas turnover grew by 4% between 2005-2012
- London BIDs are becoming more experienced and knowledgeable; they are diversifying their income, functions and responsibilities
- BID services range from: basic improvements; cleanliness; safety; marketing; events; business support; corporate social responsibility; environmental sustainability; regeneration.

- 5.3.6 The BIDs programme has been embedded in the work of the LEP;
- A budget of £230,000 has been allocated for the London BIDs programme. Of this, £200,000 is available for grants for new BIDs and £30,000 to other activities, like developing a BIDs handbook or creating legal templates for BIDs
  - A London BIDs steering group has been set up and meets on quarterly basis
  - The group provides advice and support to GLA officers in the development of the BIDs grants programme as well as the development a programme of support for existing BIDs
  - The BIDs grant programme was launched in December 2013
  - Four grants have been awarded since the programme was launched: South Bank, Clapham, Bermondsey and Cheapside.

- 5.3.7 GLA guidance on how to set up new BIDs will be available on the GLA website from June 2014. In October

2014, Central Government will be seeking to approve legislation to support the set up of landowner BIDs.

**SPG IMPLEMENTATION 5.3 BUSINESS IMPROVEMENT DISTRICTS**

Boroughs and town centre partners are encouraged to:

- a support the implementation and development of BIDs where appropriate
- b reconcile the interests and responsibilities of land owners with current governance arrangements for BIDs.

**5.4 OTHER RESOURCES AND INITIATIVES**

**Harnessing the potential of the internet**

- 5.4.1 The Grimsey review<sup>10</sup> highlights that since retailers, service providers and local government are connected to the internet, there is great potential to build up the ICT infrastructure and connectivity in town centres and enable retail, services and customers to interact with each other in real time. The growth in the use of the internet and mobile technology presents several opportunities for town centres including:
- Marketing the town centre as a place to live, work, visit and set up business, promoting its shops, activities, its unique character, culture and attractions and how to get there, using websites and mobile applications
  - Brand pavilions, where businesses and retailers establish exhibition space either to showcase innovation (eg. the Siemens pavilion, Royal Docks) and/or display their latest products which customers can

either purchase at the pavilion or via the internet (eg. the Apple Store in the West End)

- Physical shop units for growing virtual, digital commercial activity to complement trends in ‘e-tailing’ and ‘e-service delivery’
- Capturing the growth in ‘click and collect’ services with pick-up points in town centres and close to public transport nodes<sup>11</sup>
- Pick-up points on high streets where people can collect items bought online and encourage linked-trips to the centre
- Strategic initiatives to increase cable and other digital capacity
- Enabling small and independent businesses and retailers in the town centre to widen their catchment to a global market through the development of their own transaction websites – there may be a role for Town Teams, Town Centre Management, Partnerships and BIDs to provide support with this
- Town centre retailers providing free internet access to their own website in store to enable all customers (including those who do not have internet access at home) to browse the full product range and make purchases in store or via the secure internet access point for later delivery/collection.

### **Planning Obligations and Community Infrastructure Levy**

- 5.4.2 Section 106 planning obligations are an important part of major planning applications and can bring with them associated benefits for London’s town centres and support town centre strategies. The Community Infrastructure Levy (CIL) may become of increased importance as the scope of planning obligations is being reduced after April

2015 but planning obligations are likely to continue to have an important role with regard to affordable housing and for direct impact mitigation and items that are not infrastructure such as bus service enhancement.

### **Town centre rents and leases**

- 5.4.3 The Outer London Commission has drawn attention to the unrealistic scale of some upwards only rent reviews and the apparent willingness of landlords to have vacant rather than occupied premises (albeit at lower rents). Town teams and town centre partnerships including local landlords can draw attention to this issue where it is a matter of concern. The RICS and British Retail Consortium have developed a new model lease and guidance aimed at small businesses, with a relatively short lease length (maximum five years), no upward-only rent review and a break clause to enable the tenant to end the lease early.

### **Heritage Lottery Fund**

- 5.4.4 The Townscape Heritage Initiative, and other grants available for non-physical works, could be drawn on to improve the appearance of historic centres and to use heritage as a focus for placemaking.

### **Localism Act 2011**

- 5.4.5 The Localism Act 2011 contains a number of provisions of direct relevance to town and other centres including:
- *A General power of competence*, which gives local authorities more freedom to act in the interest of their local communities, enabling them to raise money and drive down costs to deliver more efficient services
  - *Duty to cooperate*, requiring local

authorities and other public bodies to work together on planning issues.

- *Community Infrastructure Levy*, which allows councils to charge developers to pay for infrastructure<sup>12</sup>. Amendments to make the levy more flexible allowing some of the money raised to be spent on things other than infrastructure.
- *Community Right to Bid*, giving communities powers to save local assets threatened with closure, by allowing them to bid for the ownership and management of community assets.
- *Neighbourhood Plans*, giving local people new rights to shape the development of the communities in which they live.
- *Community Right to Build*, giving groups of local people the power to deliver the development that their local community want, such as new homes, businesses, shops, playgrounds or meeting halls.
- *Neighbourhood development orders* allowing communities to approve development without requiring normal planning consent.

### SPG IMPLEMENTATION 5.4 OTHER RESOURCES AND INITIATIVES

Boroughs and town centre partners are encouraged to:

- a harness the potential of the internet for the benefit of residents, visitors and businesses in town centres
- b consider a range of short, medium and long term resources, initiatives, funding streams and partnerships to secure town centre renewal.

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# ENDNOTES

<sup>1</sup> <https://knowledgehub.local.gov.uk>

<sup>2</sup> BITC & CLG, Under-Served Markets: Retail and Regeneration, November 2007 (examines five retail-led regeneration case studies highlighting good practice). See also DTZ, BITC, BCSC. Retail-led regeneration. Why it matters to our communities. November 2009.

<sup>3</sup> London Assembly Economy Committee: Open for Business. Empty shops on London's high streets GLA, March 2013.

<sup>4</sup> Experian Business Strategies, 2013 op cit. Mayor of London. 2013 London Town Centre Health Check, GLA, 2014

<sup>5</sup> Note Government initiative allowing temporary permitted development rights (see para 1.1.15)

<sup>6</sup> Note that that although posters/advertising would not need planning permission they may need advertisement consent, although there are various exemptions

<sup>7</sup> See [www.meanwhile.org.uk](http://www.meanwhile.org.uk) and EEDA, Empty shops and premises: Researching the baseline, March 2010

<sup>8</sup> <http://www.atu.org.uk>

<sup>9</sup> [www.placemanagement.org](http://www.placemanagement.org)

<sup>10</sup> The Grimsey Review: An Alternative Future for the High Street, 2013

<sup>11</sup> See London Assembly Economy Committee: Open for Business. Empty shops on London's high streets GLA, March 2013

<sup>12</sup> The London-wide Community Infrastructure

Levy commenced 1 April 2012. See: Mayor of London, Community Infrastructure Levy. Charging Schedule. GLA, February 2012







## 6. PROACTIVE TOWN CENTRE STRATEGIES

6.0.1 This section of the SPG provides guidance on town centre strategies, management of the town centre network, the London Plan town centres first approach, co-ordination with the wider city region and town centre health checks.

### 6.1 TOWN CENTRE STRATEGIES AND MANAGEMENT

#### A clear vision for town centres

6.1.1 The London Plan sets out a strong strategic vision for London's centres (Policy 2.15). Town centres also need a strong local vision, strategies and leadership to help them diversify and adapt to changing consumer behaviour and growth in multi-channel retailing. To ensure their long term success, town centre should be places where people want to come, for a variety of different reasons and enjoy using the spaces. A clearly-articulated concept of what a town centre has to offer can help to encourage visitors by giving them a clear sense of the town centre's 'brand'<sup>1</sup>.

6.1.2 It is important that there is a strategy in place for each of London's town centres. Such strategies and plans may take various forms, for example they may be incorporated in Local Plan Core Strategies, Supplementary Planning Documents, Area Action Plans, Neighbourhood Plans or in locally produced town centre strategies. These can be accompanied by more site specific planning briefs, masterplans and site allocations.

#### CASE STUDY: DEVELOPING TOWN CENTRE STRATEGIES IN WANDSWORTH

Wandsworth Council has been working with the local business community and local people to come up with a new vision to help their town centres thrive. It engaged a specialist consultancy to assess the health of each of the five borough town centres - Putney, Wandsworth, Clapham Junction, Balham and Tooting. Using an online survey the Council took on board the views of residents, property owners, businesses, investors, community groups and others to draw up a shared vision, identity and a strategy for each town centre.

#### A collaborative approach

6.1.3 Collaboration and early engagement with public and private organisations and service providers (eg Transport for London, NHS, police, education institutions), local people, schools, faith communities, businesses, land owners, community and voluntary organizations, access groups and the local media is essential. Such engagement and ownership of town centre strategies is a vital component in their development, delivery and ongoing town centre management.

6.1.4 The Mayor does not wish to be prescriptive about the specific content of town centre strategies but considers that they should:

- be proactive and collaborative
- take a long term strategic perspective taking into account the role and function of the centre in network, the potential for intensification and diversification, including housing, and also
- address more immediate concerns.

**Town centre management**

- 6.1.5 Effective town centre management can help ensure that local partners can co-ordinate actions to help town centres respond to the challenges and opportunities that they face. It includes direct, proactive and structural interventions, active day to day management as well as being responsive through the development management system. There is already a significant amount of guidance to help partners maximise the value of existing town centre management or to assist in setting up new structures. This includes:
- Detailed support and guidance from the Association of Town Centre Management (ATCM) which has an active London regional network that can be contacted through the main ATCM website<sup>2</sup>. Additional useful guidelines from the ATCM are contained in a recently launched website, ‘100 Ways to Help the High Street’<sup>3</sup>.
  - Guidelines and learning from the Mayor’s regeneration programmes and Portas ‘Town Teams’ (see section 5.1)
  - Business Improvement Districts (see section 5.3).

**SPG IMPLEMENTATION 6.1  
TOWN CENTRE STRATEGIES AND  
MANAGEMENT**

Boroughs and town centre partners are encouraged to:

- a put in place a strong vision and strategy in place for each town centre, including local and neighbourhood centres
- b ensure that the range of town centre constituencies of interest is taken

- into account as part of a collaborative approach
- c support effective town centre management to co-ordinate action.

**6.2 MANAGING THE TOWN CENTRE NETWORK**

- 6.2.1 The town centre network is dynamic and the scale, role and function of centres do change over time (the “sprung network” concept). In the London Plan Map 2.6 and Annex 2, Table A2.1, town centres are classified according to their existing role and function in the network, based on evidence from London-wide strategic town centre health checks<sup>4</sup>.
- 6.2.2 The process for managing changes in the town centre network through the development plan process is set out in London Plan policy 2.15 and paragraphs 2.71-2.74. Changes must be co-ordinated strategically (including where relevant with planning authorities outside London – see section 6.4) and supported by clear evidence in a local town centre health check and retail capacity/impact assessment.
- 6.2.3 To assist with this process, London Plan Table A2.2 provides an indication of potential changes to the town centre network over the plan period including potential new centres. Whilst these centres are not recommended for immediate reclassification in the London Plan, it is recognized that they may be appropriate for future reclassification, subject to strategic and local plan policies and conditional on matters such as capacity analysis, impact assessments, land use, transport accessibility, planning approvals and full implementation.

- 6.2.4 At the local level, boroughs are encouraged to identify other, smaller neighbourhood centres to provide convenient access, especially by foot, to goods and services needed on a day to day basis.

### SPG IMPLEMENTATION 6.2 MANAGING THE TOWN CENTRE NETWORK

Boroughs and town centre partners should:

- a coordinate the changing roles of centres in collaboration with the GLA
- b use health checks to inform coordination of the dynamics of this network.

## 6.3 SEQUENTIAL APPROACH, IMPACT TESTS AND TOWN CENTRE DEVELOPMENT

- 6.3.1 This SPG reaffirms the strong **town centres first** approach in the London Plan to accommodate new retail, leisure and commercial development within town centres, or in well integrated edge of town centre locations (policy 4.7). Given the higher levels of car dependency, lower levels of public transport accessibility and the need to tackle climate change and congestion, the Mayor strongly discourages out of centre development (policy 4.7Cd). To implement this approach stakeholders are encouraged to:
- take a proactive partnership approach to identify sites in Local Plans to accommodate identified needs for retail, leisure and other employment space and promote mixed use development with housing in line with London Plan policy 2.15A and Cb
  - take positive steps to bring these sites forward for development through

collaboration with local stakeholders, supporting site assembly and where appropriate use of compulsory purchase powers (see London Plan policy 2.7Ah)

- adopt a rigorous approach to sequential and impact tests for retail, leisure and commercial development with sympathetic treatment of well integrated edge of town centre sites where no suitable, available or viable town centre (policy 4.7Bb,c)

- 6.3.2 When considering whether edge of centre sites are well integrated in terms of policy 4.7Bb, local authorities should take account of the following:
- the scope for improvements in physical integration with the existing centre (overcoming disabling barriers such as major roads, car parks, railways, waterways or topography and inaccessible routes, including steep gradients)
  - the degree to which the development promotes inclusive access (policy 7.2)
  - the extent to which the development supports and promotes safe, direct and convenient access to and from neighbouring areas by cycling
  - the relationship with a range of public transport nodes and services including rail, tube, trams, DLR stations, interchanges and bus stops
  - the degree to which the development and its format can promote connections through the centre to generate positive footfall and promote the vitality and viability of the centre as a whole, throughout the day and into the evening.
- 6.3.3 In line with NPPF paragraph 26, London Plan policy 4.7Bc requires an **impact assessment** for applications for new, or extensions to existing, edge or out

of centre development. This policy is applicable to retail, leisure and office development exceeding 2,500 sqm outside of town centres, which are not in accordance with an up-to-date local plan.

6.3.4 An impact assessment may also be required for developments below this threshold, for example, where a borough has set a proportionate, local floorspace threshold as indicated in the NPPF. It may also be required where a proposal is likely to give rise to adverse impacts, such as a development at a scale not related to the role/function of a centre (LP policy 4.7Ba), such as for example a large supermarket or superstore in or on the edge of a neighbourhood or local centre.

6.3.5 Impact assessments should be carried in line with Government practice guidance taking into account cross-border flows of expenditure to/from neighbouring authorities including those outside London. Given London’s unique circumstances, its density of population and built-up urban structure, its public transport accessibility and high numbers of people who do not have access to a car, impact assessments should also consider:

- the impact on accessibility by sustainable modes of transport
- the impact on overall traffic patterns and congestion
- the impact on the overall objectives of the London Plan, and in particular those for town centres.

6.3.6 The future of **existing out of centre** retail and leisure development and poorly integrated edge of centre

development should be evaluated. These should be managed in line with Policy 4.7Ce. Local authorities should combine

- steps to promote inclusive access by public transport, cycling and walking
- steps to reduce car dependency such as car sharing schemes and car clubs
- consider the scope to diversify and redevelop surplus retail/leisure floor space and areas dedicated to car parking space (potentially a significant contribution towards housing capacity)
- discourage increases in the amount of retail and leisure floor space in out of centre locations as part of a wider mix of uses (London Plan policy 4.7Cd). Housing in mixed use developments in out of centre locations should not, in itself, be used as a reason to justify additional floorspace for retail and leisure uses in such locations.

**SPG IMPLEMENTATION 6.3 SEQUENTIAL APPROACH, IMPACT TESTS AND TOWN CENTRE DEVELOPMENT**

Boroughs and other town centre partners should:

- a follow a firm ‘town centres first’ approach to accommodate growth and support well integrated, sustainable, edge-of-centre development that could not otherwise be accommodated in-centre (the London approach to the ‘sequential test’)
- b undertake impact assessments in line with the NPPF and practice guidance taking into account London’s unique circumstances and retail floorspace in the planning pipeline including that in neighbouring boroughs and outside London where appropriate
- c bring forward town centre capacity



to support town centre vitality and viability and meet needs for commercial development and housing through intensification and redevelopments at higher densities taking into account other London Plan policies

- d consider how edge of centre sites can be better integrated with town centres
- e resist inappropriate out of centre development with clear guidelines on the exceptional circumstances where such development may be appropriate
- f make existing edge and out of centre retail, leisure and office developments more sustainable in transport terms, by promoting inclusive access by public transport, cycling and walking and consider their potential to realise capacity for new housing.

## 6.4 CO-ORDINATION WITH THE WIDER METROPOLITAN AREA

- 6.4.1 London is at the centre of a city region covering a large part of South East England, home to 22.7 million people and some 12.1 million jobs<sup>5</sup>. The capital has strong functional linkages with the wider South East (London Plan Policy 2.2) and the catchment areas of many of London's larger centres extend well beyond the city boundary. Co-operation and joint working between local authorities within London and those outside is essential to support a coordinated approach to town centre development.
- 6.4.2 Flows of expenditure on retail and leisure cross the regional boundaries and are influenced by commuting

patterns to workplaces. Distribution networks servicing the retail, leisure and business functions of London's town centres are complex with many supply chains originating from outside London. These interrelationships have been considered in this SPG and have been taken into account when considering the requirements for additional town centre development and floorspace to meet future projected needs.

- 6.4.3 Figure 6.1 illustrates the spatial relationship between London's larger town centres with those in the wider city region (including its regional shopping centres) containing more than 100,000 sq.m of comparison goods retail floorspace or other significant retail attractors such as major department stores. In terms of scale and impact on expenditure flows across the London boundary, it is Bluewater, Lakeside and Watford that exert the greatest influence. It is estimated that that these three locations derive 33%, 32% and 20% respectively of their comparison goods expenditure from households living within the Greater London area<sup>6</sup>. To ensure the continued health, viability and vitality of town centres it is essential that planned growth and changes to the role and functions of centres in London and the wider city region are co-ordinated strategically through alterations/reviews to the London Plan and in local plans outside London.

**FIGURE 6.1 LONDON'S TOWN CENTRES AND RELATIONSHIP WITH THE WIDER CITY REGION**



Source: GLA Intelligence and GLA Economics

6.4.4 London's centres will play an important role in the development and regeneration of the Growth Areas (Thames Gateway and London-Stansted-Cambridge-Peterborough) and the Co-ordination corridors (including the Western Wedge, Wandle Valley and London-Luton-Bedford). The Mayor has committed to engage with relevant agencies beyond London to identify and develop these Areas and Corridors (London Plan Policy 2.3). This will involve integrating existing and new transport infrastructure with land use and development capacity within London and the south east of England, providing greater economic synergies between business locations and centres in and around London.

6.4.5 The Mayor is committed to working with the planning authorities in the former South East and the East of England regions through suitable arrangements established with local authorities and other partners. The GLA has set up an officer working group to discuss strategic spatial planning issues that are relevant to local authorities and counties surrounding London. Integrated policies across the London boundary to promote spatially balanced and sustainable economic growth will be essential to support the vitality and viability of centres in London and the wider south east. The Mayor will also seek to ensure a more level playing field where relevant on matters such as parking standards and integrated policies on other matters such as commuting, logistics and infrastructure.

## SPG IMPLEMENTATION 6.4 CO-ORDINATION WITH THE WIDER METROPOLITAN AREA

Boroughs and town centre partners are encouraged to:

- a ensure development complements other parts of the town centre network including coordination with the wider city region
- b develop integrated policies across the London boundary to promote spatially balanced and sustainable economic growth to support the vitality and viability of London's centres and those in the wider south east
- c ensure that London's town centres play an important role in the development and regeneration of the London Plan Growth Areas and Co-ordination corridors.

## 6.5 TOWN CENTRE HEALTH CHECKS

- 6.5.1 The London Plan (Policy 4.7Cb), NPPF and associated practice guidance highlight the importance of regular town centre health checks to monitor the vitality and viability of town centres and to inform policy development, programmes and town centre management.
- 6.5.2 The London Town Centre Health Check (TCHC)<sup>7</sup> is part of an ongoing series of strategic London-wide health checks undertaken by the Greater London Authority (GLA) with support from the London boroughs. It provides a 'snapshot' of the health of over 200 of London's town centres (International, Metropolitan, Major and District) using

a selection of strategic health check indicators and illustrates how some of these have changed over time.

- 6.5.3 The objectives of the London Town Centre Health Check are to:
- co-ordinate across all London boroughs and other agencies the collection of data on indicators of town centre vitality/ viability and identification of capacity of different centres within the network to meet likely future needs
  - provide thresholds for selected indicators against which the performance of centres can be assessed, identifying their scale, role/function in the network, role in the regeneration process and strategic clusters of night time economy
  - inform alterations and reviews of the London Plan including changes to the London Plan town centre network including potential future changes in the classification of centres
  - support the preparation and implementation of local plans including town centre policies and proposals and town centre management strategies
  - contribute to cross boundary working with neighbouring authorities through a more co-ordinated approach to town centre development and retail/leisure provision across the wider city region.
- 6.5.4 When conducting more local health checks boroughs are encouraged to supplement the strategic health check indicators with more locally sensitive data including for local and more neighbourhood centres.

### **SPG IMPLEMENTATION 6.5 TOWN CENTRE HEALTH CHECKS**

Boroughs and town centre partners are encouraged to:

- a gather data as far as possible that address the key indicators contained within the strategic London TCHC for all their town centres including those shared with neighbouring authorities
- b supplement the strategic indicators with more locally sensitive data including for local and more neighbourhood centres.

## ENDNOTES

<sup>1</sup> See also Mary Portas report, op cit and paragraph 5.4.1 of this SPG

<sup>2</sup> <http://www.atcm.org>

<sup>3</sup> <http://www.100ways.org.uk/>

<sup>4</sup> Mayor of London. 2009 London Town Centre Health Check Analysis Report. GLA, December 2009

<sup>5</sup> Source: GLA Intelligence and GLA Economics

<sup>6</sup> Source: Experian Business Strategies

<sup>7</sup> Mayor of London. 2013 London Town Centre Health Check Analysis Report. GLA, 2014

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## 7. STRATEGIC OUTER LONDON DEVELOPMENT CENTRES

- 7.0.1 To foster economic growth beyond central London the London Plan identifies ‘Strategic Outer London Development Centres’ (SOLDCs – Policy 2.16). These are business locations of different types with distinct strengths of greater than sub regional importance, which can be enhanced without significantly undermining the roles of other locations (the offer of which is usually of no more than sub regional importance)<sup>1</sup>. As a general principle, this will require specialist rather than mixed use development. However, in some circumstances (such as supporting new office provision), mixed use development that includes housing can play an enabling role.
- 7.0.2 The Mayor will work with boroughs and other stakeholders to promote current and identify potential new SOLDCs and to explore whether and how mixed use development including housing can help to realise their potential. This SPG provides implementation guidance for the identified SOLDCs and sets out criteria that may be used to guide the designation and development of other SOLDCs. The Outer London Commission (OLC) recommends<sup>2</sup> that the SOLDC concept has considerable potential for further development whilst ensuring that it is designed not to undermine the economic prospects of neighbouring town centres including those in

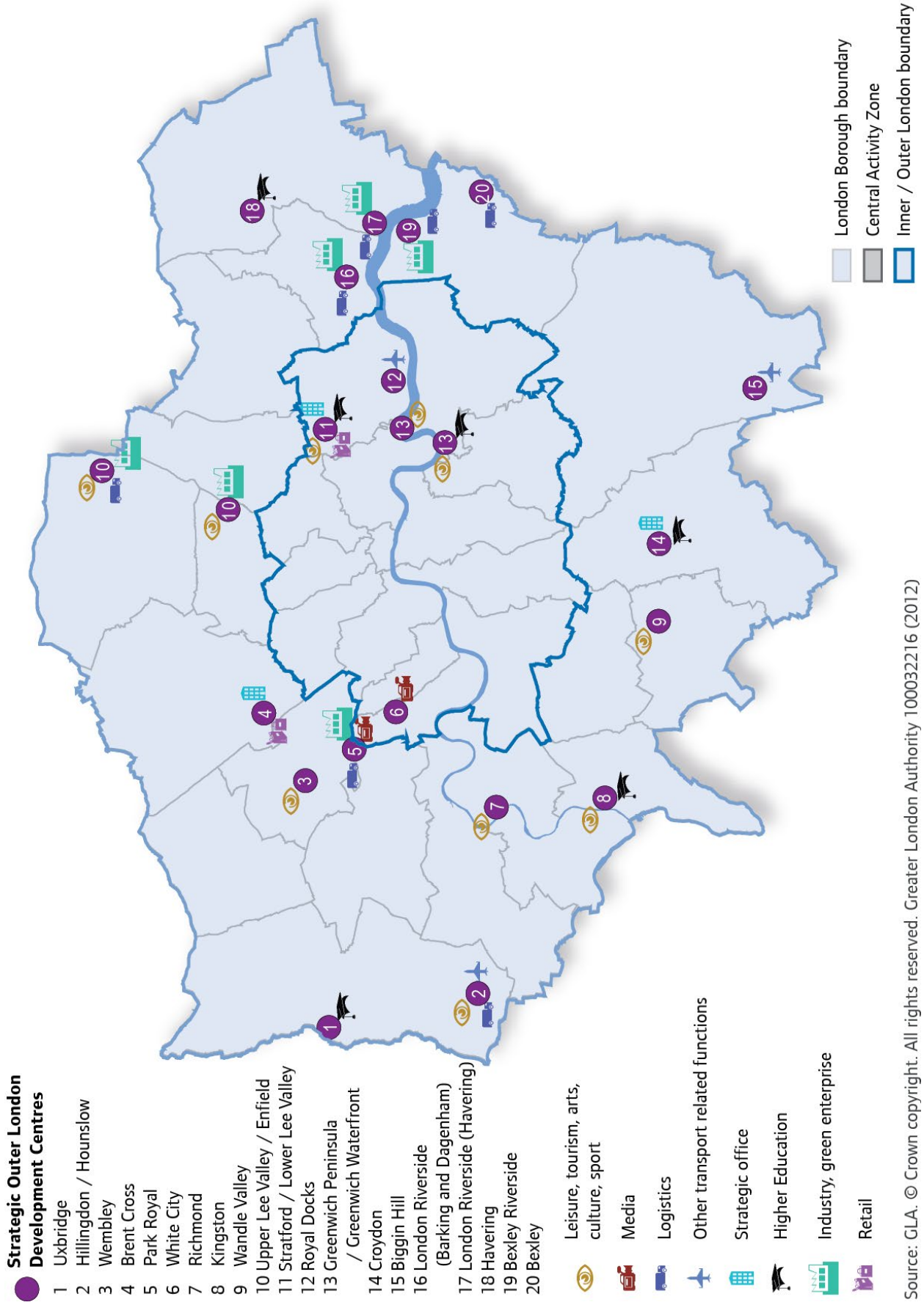
adjacent boroughs. The OLC will play an important role in furthering the concept and supporting implementation.

### POLICY 2.16 STRATEGIC OUTER LONDON DEVELOPMENT CENTRES

#### Strategic

- A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than subregional importance (see para 2.77) by:
- a co-ordinating public and private infrastructure investment
  - b bringing forward adequate development capacity
  - c placing a strong emphasis on creating a distinct and attractive business offer and public realm through design and mixed use development as well as any more specialist forms of accommodation
  - d improving Londoners’ access to new employment opportunities.
- B The Mayor will work with boroughs and other partners to develop and implement planning frameworks and/ or other appropriate spatial planning and investment tools that can effect positive change to realise the potential of strategic outer London development centres.

FIGURE 7.1 LONDON'S STRATEGIC OUTER LONDON DEVELOPMENT CENTRES



## 7.1 SOLDC IMPLEMENTATION PRINCIPLES

- 7.1.1 The SOLDCs identified in the London Plan are illustrated in Figure 7.1. The Mayor is committed to work with relevant stakeholders to explore the potential of these and other locations for strategically significant, specialist growth in ways which will help achieve the Mayor's wider objectives (including tackling congestion and carbon emissions by reducing the need for long-distance commuting).
- 7.1.2 Development of the SOLDC concept in the identified locations should support:
- the principles in the vision and strategy for outer London (Policy 2.6)
  - the economic and transport policies in the London Plan for outer London (Policies 2.7 and 2.8) and
  - policies for inner London (Policy 2.9) for SOLDCs lying in inner London.
- 7.1.3 Recent discussion through the OLC of the concept of SOLDCs highlighted a range of views on their benefits. The Mayor appreciates concerns over the introduction of a novel planning concept. Application of the SOLDC concept should not lead to pigeonholing or over-reliance on a particular specialisation. It should not inhibit their ability to attract and nurture activity of other kinds. Nor should growth in a SOLDC be to the detriment of growth among its neighbours.
- 7.1.4 The role of SOLDCs must be developed to safeguard the economic strengths of different types of business location including town centres, other office locations such as those indicated in the London Plan (paragraph 4.12) and industrial areas (Policies 2.17 and 4.4<sup>3</sup>). It must also be accepted that all economic activities can change over time – the planning system must respond positively to the opportunities they provide. A good example is provided by Croydon which thirty years ago responded positively to the need for 'back offices' and, as these have become outmoded, is now reinventing itself as a modern office location.
- 7.1.5 While town centres offer particular advantages for some specialist activities, the SOLDC concept can apply to the range of business locations. This guidance is designed to accommodate diversity in the roles of the SOLDCs. Details can be developed at the local level, allowing boroughs the flexibility to respond to local need and circumstances.
- 7.1.6 Boroughs may find that Mayoral support for SOLDC development would be useful at the stage of local plan preparation and in developing strategic infrastructure plans to support them, and the importance of planning frameworks to deliver them. Boroughs are therefore encouraged to engage with the GLA at an early stage in plan preparation.
- 7.1.7 This SPG offers strategic support for local initiatives to take forward the SOLDC concept including through development frameworks and strategic infrastructure plans in light of local circumstances. It is not a 'one size fits all' approach. It is designed to encourage local innovation to identify and enhance distinct economic strengths which are at the heart of the concept.

- 7.1.8 Boroughs and other partners are encouraged to:
- realize the potential for further development of the Strategic Outer London Development Centres concept whilst ensuring that it supports and complements the economic prospects of neighbouring town centres including those in adjacent boroughs
  - develop complementary linkages with other types of business locations, for example town centres, office locations and development corridors extending beyond London.
- 7.1.9 Implementation of London Plan SOLDCs will involve actions from a range of partners in light of local circumstances on matters including (but not exclusively):
- planning policy (local and neighbourhood, where appropriate) and frameworks (including Opportunity Area Planning Frameworks, local Area Action Plans, Town Centre strategies etc)
  - strategic infrastructure plans
  - new development and refurbishment
  - transport accessibility and capacity upgrades
  - other infrastructure
  - management and investment (including Business Improvement Districts)
  - improvements to the business environment and public realm
  - promotion, branding and marketing.
- 7.1.10 Appendix E sets out guidelines on implementing the London Plan SOLDCs across the range of actions in paragraphs 7.1.9 above where relevant.

### **SPG IMPLEMENTATION 7.1 SOLDC IMPLEMENTATION PRINCIPLES**

Boroughs and town centre partners are encouraged to:

- a realize the potential for further development of the Strategic Outer London Development Centres concept whilst ensuring that it supports and complements the economic prospects of neighbouring town centres including those in adjacent boroughs
- b encourage local innovation to identify and enhance distinct economic strengths which are at the heart of the concept
- c support local initiatives to take forward the SOLDC concept in light of local circumstances including planning policy and frameworks, strategic infrastructure plans, new development and refurbishment, transport accessibility and capacity upgrades, management and investment (including Business Improvement Districts), improvements to the business environment, branding, promotion, events and marketing
- d develop complementary linkages with other types of business locations, for example town centres, office locations and development corridors extending beyond London
- e realize the potential of each of the London Plan SOLDCs having regard to the guidelines in Appendix E.



## 7.2 CRITERIA AND PROCESS FOR IDENTIFICATION OF POTENTIAL NEW SOLDC

7.2.1 The Outer London Commission considered potential criteria<sup>4</sup> to define SOLDCs and these helped inform the locations identified in the London Plan. The list of locations in the Plan and this SPG is not exhaustive and will continue to be tested in future iterations of the London Plan. To inform that process of definition and testing, a list of criteria is set out in Figure 7.2.

7.2.2 Strategic and local partners are encouraged to:

- Ensure that implementation of the existing SOLDC meet the criteria guidelines set out in Figure 7.2
- Use the criteria in Figure 7.2 to identify potential additional SOLDC and to inform future alterations/reviews of the London Plan.

**FIGURE 7.2 POTENTIAL CRITERIA TO DEFINE STRATEGIC OUTER LONDON DEVELOPMENT CENTRES**

<p><b>(1)</b> Potential growth is strategically significant in scale – that is, greater than sub-regional importance.</p>
<p><b>(2)</b> Location contains one or more specialist attributes of greater than sub-regional importance based on the scale and mix of activity in particular sectors in accessible locations including for example:</p> <ul style="list-style-type: none"> <li>• retail</li> <li>• office clusters</li> <li>• innovation/technology/research &amp; development/life sciences</li> <li>• logistics/industry/green enterprise</li> <li>• government functions</li> <li>• media</li> <li>• academia</li> <li>• health</li> <li>• leisure/tourism/arts/culture/sports</li> <li>• transport related functions</li> <li>• strategic commercial capacity</li> </ul>
<p><b>(3)</b> Specialist growth potential can be implemented without undermining the prospects of other business locations and in particular established town centre locations</p>
<p><b>(4)</b> Growth will help implement wider London Plan objectives including policies for outer London and tackling congestion and carbon emissions by reducing the need for long-distance commuting</p>

**SPG IMPLEMENTATION 7.2 CRITERIA  
AND PROCESS FOR IDENTIFICATION OF  
POTENTIAL NEW SOLDC**

Boroughs and town centre partners are encouraged to:

- Consider the potential to bring forward potential new SOLDCs through the London Plan process, having regard to the criteria in Figure 7.2.

## ENDNOTES

1 Mayor of London. The Mayor's Outer London Commission. Final Report. GLA, 2010

2 The Outer London Commission. Second Report. GLA 2012

3 See also Mayor of London. Land for Industry and Transport Supplementary Planning Guidance, GLA, 2012

4 Mayor of London. The Mayor's Outer London Commission. Final Report. GLA, 2010

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## APPENDIX A: MANAGING THE NIGHT TIME ECONOMY

**FIGURE A.1 CHECKLIST OF POTENTIAL INTERNAL AND EXTERNAL PARTNERS WHOM LOCAL AUTHORITIES MAY NEED TO INVOLVE IN MANAGING AND PLANNING FOR THE NIGHT TIME ECONOMY.**

Potential internal partners:

- Alcohol and entertainment licensing
- Planning
- Development/building control
- Environmental health (noise and food safety)
- Town centre management
- Transport planning
- Street engineering (paving, lighting, design, urban realm)
- Parking management
- Refuse collection
- Street cleansing
- Public conveniences
- Community safety/crime and disorder reduction partnership (CDRP)
- Drug and Alcohol Action Teams
- Local Alcohol Strategy Co-ordinators
- Regeneration/economic development
- Tourism/the visitor economy/marketing
- Arts/culture
- Rough sleepers unit
- CCTV
- Trading standards
- Street wardens

Potential external partners:

- Local police including Safer Neighbourhood Teams
  - Fire authority (fire safety certification and inspection)
  - Licensed trade including representatives from the trade and licensees
  - Other local businesses and any major employers in the town centre
  - Land owners
  - Local residents and civic organisations
  - Transport for London (TFL buses, Taxi and Private Hire, Safer Travel at Night)
  - Users of the night time economy
  - Primary Care Trusts and local Accident and Emergency departments
  - Ambulance services
-

**FIGURE A.2 ELEMENTS OF AN INTEGRATED APPROACH TO MANAGING THE NIGHT TIME ECONOMY IN LONDON, INCLUDING CROSS-REFERENCING WITH KEY AREAS OF RESPONSIBILITY**

	Integration	Planning	Licensing	Transport	Policing/Safety	Environment
There is a need for integrated action by a range of stakeholders. These include agencies concerned with licensing, noise, environmental protection, waste & cleansing, policing, education and transport matters.	✓	✓	✓	✓	✓	
Strong integration of principles to manage the night time economy (set out in London Plan policy 4.6 and paragraphs 2.2.14 to 2.2.16 of this SPG) with availability and standard of late night transport is of particular importance.	✓		✓	✓	✓	✓
An integrated approach to, and co-ordination of premises' operating plans, conditions on licenses and planning permissions can help to reduce cumulative impact.	✓		✓	✓	✓	✓
It is important that local licensing policies take into account broader strategic concerns, especially in designation of 'saturation areas'.	✓	✓	✓	✓	✓	✓
Exploring how the Business Improvement District (BID) concept can be applied to night time economy areas could provide an approach to managing the impacts in appropriate locations.	✓	✓	✓	✓	✓	✓
Use of Section 106 agreements, statutory discretionary service charges and, where appropriate, BIDs can help secure payment for costs generated by late night activities.	✓	✓	✓	✓	✓	✓
Joint promotion of evening/night time facilities and events in town centres, through town centre and similar management initiatives, can help to broaden the range of night time activities.	✓	✓	✓	✓	✓	
Managing the night time economy in London requires a balance between clustering and dispersal of activities. This includes sustaining and managing strategic clusters of night time activity in line with the London Plan and promoting a more diverse range of uses into the evening and night. This provides opportunity for a wider spread of eating, theatre, cinema and more general entertainment, leisure and cultural activities within and between town centres.	✓		✓	✓	✓	✓
Pro-active planning and design of late night eating, drinking and entertainment venues can prevent nuisance to established and prospective noise-sensitive uses, notably housing. This may include locating venues where users can access transport most quickly, and where effective acoustic screening or separation from existing or planned housing can be achieved.	✓		✓	✓	✓	✓
The effects of the licensing regime require close monitoring in order to assess whether and how town centre capacity limits could help manage the night time economy rather than introducing such limits from the outset.	✓		✓	✓	✓	✓
Extending the range of less alcohol-focused night time activities and those which appeal to a broader social and age spectrum can help to develop a more diverse and welcoming night time economy and reduce the extremes which can currently occur.	✓		✓		✓	



	Integration	Planning	Licensing	Transport	Policing/Safety	Environment
Undue weight should not be placed on the planning system in resolving tensions between uses. It deals only with new development including change of use and re-development, and cannot generally manage the much more extensive existing stock.	✓				✓	✓
Statutory nuisance action 'post hoc' is expensive and cannot solve all conflicts. Therefore, pro-active preventative measures applied by a number of agencies form an important part of an integrated approach to management.	✓				✓	
Use of effective high quality lighting and other urban design measures can help to design out crime and generate a 'legible' network of public spaces and routes which minimises conflicts between users.	✓				✓	✓
Planning and design of noise-sensitive uses, notably conversions to housing, can help to protect occupants from the reasonable operation of defined and/or established areas of late night activity. Location, layout and design can be used, as far as possible, to achieve suitable conditions with windows of habitable rooms open, rather than relying exclusively on building insulation.	✓	✓				✓
Staggered opening hours, and closer integration with transport capacity and policing, can help to reduce peaks of negative impacts which can occur when venues close.	✓	✓	✓	✓	✓	
Transport implications could be a relevant consideration for inclusion among assessment criteria in boroughs statements of licensing policy.	✓	✓	✓	✓		
Borough liaison with TfL and MPS is important when considering applications for licence extensions with policing implications, including recognition of transport capacity, catchment/demand for new hours, likely additional demand by mode and geography, dispersal and safe travel plan arrangements, wider crime and disorder implications for local community.	✓		✓	✓	✓	✓
The Safer Travel at Night campaign provides information on and access to safer travel alternative and is raising awareness of the dangers of using unbooked minicabs. <a href="http://www.tfl.gov.uk/cdn/static/cms/documents/STaN-communications-development-report.pdf">http://www.tfl.gov.uk/cdn/static/cms/documents/STaN-communications-development-report.pdf</a>	✓		✓	✓	✓	
Venues can help to ensure customers make an informed and reasoned choice in order to get home safely	✓		✓	✓		
Working with operators to discourage practices which can lead to binge drinking (e.g. discounted prices, drinks promotions and seating arrangements), and co-ordinating this with planning policy to discourage development of high volume vertical drinking establishments, can help to reduce some of the negative impacts of the night time economy.	✓	✓	✓		✓	✓
In considering licensing objections, strategic as well as local concerns should be taken into account, particularly in the strategic locations set out in the London Plan Annex 2.	✓		✓	✓		✓
There are limits to licensing policies and conditions which cannot manage the impacts of the night time economy alone. It is therefore important to ensure a combination of pro-active controls is used, while avoiding duplication.	✓	✓	✓			

	Integration	Planning	Licensing	Transport	Policing/Safety	Environment
Greater enforcement of existing powers, which can require owners/occupiers to clear their area of litter and require litter to be placed in bins and at certain locations, can complement borough refuse collection and cleansing services.	✓		✓			✓
Effective enforcement and resourcing of noise management, including controlling break-out from premises and outdoor-generated noise, is an important part of an integrated approach to managing the NTE.	✓		✓		✓	✓
Local authorities may introduce Designated Public Places Orders (DPPO) to restrict anti-social drinking in public places where they are satisfied that nuisance or annoyance to the public or disorder have been associated with drinking in that place. However, a pro-active approach is more beneficial to manage such impacts (including recovering the costs of additional policing) before anti-social drinking issues are so prevalent as to require introduction of a DPPO.	✓				✓	
Broader strategic concerns, including possible cross-border impacts, are important issues to be taken into account before introduction of a DPPO.	✓				✓	
Coordination is crucial in tackling anti-social behaviour (ASB) across London and as part of an integrated approach to managing the impacts of the night time economy. ASB can take many forms from public littering to alcohol-fuelled damage. Many different agencies have a role to play in tackling anti-social behaviour. Further details can be found by visiting the Met website. Concerns about anti-social behaviour at the town centre or neighbourhood level you can be reported to local Safer Neighbourhood Teams - further details on the Met website: <a href="http://content.met.police.uk/Page/YourBorough">http://content.met.police.uk/Page/YourBorough</a> . The white paper, 'Putting victims first - more effective responses to antisocial behaviour', sets out the government's plans to deliver on the commitment to introduce more effective measures to tackle antisocial behaviour.	✓				✓	
It is important for Local Transport Implementation Plans to consider the need for night time transport.	✓			✓	✓	
A police presence throughout the public transport environment and use of CCTV can help to reduce anti social behaviour.	✓			✓	✓	
The implementation of marshalled taxi ranks and bus waiting areas could be considered in appropriate locations.	✓			✓	✓	
Use of Transport Operational Command Unit enforcement could be considered where taxi touting issues are of particular concern.	✓			✓	✓	
Improved information and waiting environment for bus passengers including lighting and signage could be encouraged. Provision of customised in-venue information can help reduce impacts outside venues.	✓			✓	✓	✓
While cost implications are recognised, the use of mobile urinals could be considered to reduce street fouling.	✓	✓				✓
The re-use and re-cycling of bottles has positive environmental implications, however waste management where glass bottles are used requires careful consideration.	✓					✓

## APPENDIX B: ACCESSIBLE HOTELS

Achieving the highest standards of accessible and inclusive design in hotel developments and providing at least 10% accessible hotel bedrooms (London Plan Policy 4.5).

### Introduction

- B.1 Inclusive travel is a growing market opportunity yet many hotel operators narrowly interpret disability as wheelchair use and fail to integrate accessible rooms into their business model. Yet all disabled and older people should enjoy the same level of access and service provided to all other customers. The aim of this supplementary planning guidance is to encourage all hotel operators to provide an inclusive hotel experience. This requires the whole hotel premises and experience to be welcoming and accessible, achieved through the integration of an appropriate physical environment, room fit-out and equipment and management practices, thereby implementing the London Plan aim of an accessible and inclusive visitor experience for all visitors.
- B.2 Older and disabled people from all over the UK, Europe and North America are travelling more. This has been encouraged by legislation, such as the Disability Discrimination Act and the Equality Act, by a change in attitudes and by rising expectations that full participation in society is being facilitated by the gradual removal of physical and social barriers. London is progressively removing barriers and creating inclusive places. Public buildings and spaces, buses and taxis already provide a very high degree of

accessibility, and improvements continue to be made on the Underground and at rail stations.

- B.3 Moreover, inclusive travel is a sizeable market, which is still in expansion. The UK Travel Survey proved that disabled people and their families spent more than £ 1.8 billion on UK travel in 2009. When inbound travel by European and overseas visitors is included, the market grows substantially. In 1993, Touche Ross estimated that 117 million visits to Britain could be generated by disabled travellers, including their travelling companions. The potential was estimated at £22 billion in extra tourism expenditure for Europe overall. In other European countries, inclusive travel is a well recognised market sector, which is often actively promoted.
- B.4 Disabled hotel users and inclusion professionals have raised a number of issues which, if addressed, will greatly facilitate and improve the visitor experience. These can be summarised as:
- Hotels should have sufficient provision for disabled people to exercise consumer choice, similarly to any other customer, and choose accommodation on the basis of good service, location, appropriate price, comfort and a dignified experience, which does not set the guest apart.
  - Disabled visitors have also highlighted the importance of good management policies (such as availability of accurate information at booking) and provision of equipment (such as shower seats or vibrating alarms) to make their hotel experience a comfortable and successful one.
-

- B.5 Disabled users have suggested that wheelchair accessibility provides a standard which is of great advantage to many users and should be adopted for all accessible rooms. They have also pointed out that choice (of floor or aspect, double or twin beds, etc.) should be available to them to the same degree as it is for other users.
- B.6 In order to meet the London Plan Policy 4.5 regarding accessible hotel bedrooms, applicants are expected to:
- prepare a Design and Access Statement which is sufficiently detailed to demonstrate that inclusive access is integral to the design and that adequate choice of accessible room types is provided to all customers, whether disabled or not. The Design and Access Statement should cover as a minimum the topics listed below in B.7.
  - prepare and submit with the planning application an Accessibility Management Plan which demonstrates that the management and operation of accessible rooms is considered from the outset of the design.
  - use and reference current best practice guidance such as BS8300:2009 + A1:2010 Design of buildings and their approaches to meet the needs of disabled people - code of practice; and Publicly Available Specification PAS 88:2008 Guidance on accessibility of large hotel premises and hotel chains.
  - consider the provisions in Part M of the Building Regulations as minimum standards and aim to achieve the highest standards of accessible and inclusive design, as required by London Plan Policy 7.2.
- B.7 Hotel developments in London seeking planning permission should consider as a minimum:
- Adopting a clear and easily understandable layout to the hotel as a whole and to the room itself (for example locating the accessible rooms adjacent to the lift). This will help all visitors to comfortably use the hotel facilities and removes the need for unnecessary assistance.
  - Offering an equal standard of use in all public areas of the building, including restaurant tables, breakfast areas, business centre, etc.
  - Making dignified provision for common toilets and Changing Places toilets (see <http://www.changing-places.org/>), refuge and evacuation arrangements.
  - Arranging convenient parking to allow easy access to the premises. Provision of blue badge parking bays and convenient car or taxi pick-up/drop off at the front entrance of the hotel with no obstacles or obstructions.
  - Choosing best quality finishes and fittings in keeping with the style of the interior décor of the hotel, for example by avoiding hospital style fittings and crude features, whilst of course ensuring safe, useable and comfortable operation.
  - Providing choice of room type and location, with the opportunity to have connecting rooms in a proportion of accessible rooms. Offer choice of bath or level access shower and bed type.
  - Positioning furniture, switches, mirrors and other devices (such as kettle and cups) in obvious and rational places so that they can be easily reached and safely used and so that they do not obstruct use of other facilities (e.g. furniture blocking access to the window so it is not possible to pull the curtains at night).
  - Incorporating the small and well designed

items that can make a big difference such as embossed room numbers, electronic card operated locks, easy to operate and reach room heating controls, or stick holders at restaurant tables;

- Having adequate space and storage for equipment and mobile furniture (some disabled people travel with their own mobile hoist).
- Ensuring that information is available at all stages, pre-booking to arrival and that confirmation of arrangements made at time of booking (including availability of equipment) is provided in writing in advance. Providing detailed information on the accessibility and the services available to disabled people on the main web site including photographs of accessible bedrooms and bathrooms can greatly assist initial booking decisions and avoid unnecessary later complications or disappointment on arrival.
- Training of all staff members in customer care for disabled visitors; personal and appropriate service, in line with what the hotel provides for all guests, is as important as technical solutions.
- Committing to continuous improvement and encouragement of client feedback, particularly from the users of accessible rooms.

### **Design and Access Statements**

B.8 The design and access statement for planning applications for all hotel development should as a minimum fulfil the following criteria:

- Demonstrate how the building/development will embrace inclusive design principles and promote accessibility. Specific reference should be made to the adoption of best practice, including guidance offered by British

Standards BS8300:2009 + A1:2010 and PAS 88:2008. If these standards have not been achieved the reasons should be explained in the DAS along with what other measures have been adopted instead to achieve the highest standard of inclusive design.

- State, where the applicant is part of a franchise or hotel group, how the hotel group or franchise design standards/manual respond to and achieve best practice in hotel accessibility.
  - Describe how the hotel layout helps orientation and facilitates independent use without the need for unnecessary assistance.
  - State the actual number and rationale for the adopted mix of accessible rooms making up the required 10% and how the chosen room types have been integrated into the hotel business model and expected hotel category.
  - State the approach to construction which ensures that fixed or mobile support rails and hoists can be installed and serviced as required.
  - Illustrate on plan the distribution of the rooms within the development and describe how an adequate choice of room type and location is going to be provided.
  - Illustrate on plan the location of ancillary facilities, such as wheelchair accessible toilets and changing places toilets in the public areas, storage space for mobile equipment, etc.
  - Illustrate on plan a typical layout of each accessible room type, including furniture, support rails and equipment, wheelchair turning circles, etc. Each plan layout should be accompanied by a brief description of 'fitness for purpose', describing how each room type can facilitate use by disabled people as well as other customers.
-



- Illustrate on plan the circulation routes and access to all hotel facilities without the need for assistance or unusual routeing.
- Illustrate on plan the car parking provision, and designated disabled persons parking provision. In accordance with the highest of either the relevant borough standard of the London Plan.

### Accessibility Management Plans

- B.9 Policy 4.5 of the London Plan encourages the preparation of an Accessibility Management Plan (AMP) to ensure that the management and operation of facilities are fully considered at the outset of the design and that accessibility and inclusion are monitored and maintained throughout the life of the development. An AMP is therefore distinct from a DAS, which sets out the physical provision and design rationale. The Accessibility Management Plan should accompany the planning application in a similar way to a Travel Plan and should be modelled on the Access Strategies indicated in PAS 88:2008. The level of detail to be provided by an AMP will depend on the type and scale of development being proposed. For example:
- Where the development is of a significant scale and the future operator is known, policy measures can be specific and guarantee that accessible rooms and facilities are fully integrated in the management practices and the business model of the hotel.
  - When the development is significant in scale, but the operator is not known at the time of the planning application, the AMP will describe the assumptions made at the time of the design and development. The submission of additional details prior to occupation, should preferably be required as a planning condition and/or legal obligation.
- B.10 The preparation stages of the AMPs coincide with those of the Travel Plan and should include the following steps:
- The approach above could assist franchises, and introduce standardisation within a chain, with only development specific issues included prior to occupation. This will promote guest recognition and expectation of the availability of facilities and approach to inclusive services within a given brand.
  - Smaller scale developments, with only a few accessible rooms, could simply produce a statement based on the recommendations of PAS 88:2008, Visit England's National Accessible Scheme (see <http://www.visitengland.com/national-accessible-scheme#>) or other best practice available at the time of the development.
  - All AMPs should be reviewed annually. A new AMP and DAS will be required with any major refurbishment or material change of the interior that triggers a new planning application.
- At planning stage, it will be appropriate to agree the main terms of the AMP with the borough planning officers. Pre-application reviews and discussion are encouraged for large applications.
  - At Planning Submission stage, a final AMP will accompany the Design and Access Statement and be considered as part of the planning application.
  - Post-permission and pre-opening, it may be necessary to update the AMP and include additional detail, in accordance with any conditions and / or planning legal obligations.

- Post-opening, the implementation of the Accessibility Management Plan will be rolled out. Monitoring, ongoing review and improvement is encouraged.
- Assistance from suitable organisations supporting travel for disabled people may be sought at any stage.

B.11 Accessibility Management Plans should identify as a minimum, the approach and policy for the following:

- Nominating an individual as Accessibility Co-ordinator (preferably a member of staff based on the premises) with an outline of his/ her duties
- Training of staff in disability equality issues
- Ensuring an inclusive approach to enquiries and booking procedures, including strategies for ensuring booking web sites include access information
- Reserving rooms for disabled people (such as last-let basis)
- Allocating adjacent /interconnecting rooms for personal assistants (including policy on room charges)
- Providing welcome packs (which include the Access Statement as recommended in PAS 88:2008) including detailed information of the room, its facilities and mobile equipment, the contact details for the Accessibility Coordinator or a trained advisor based within the hotel and familiarisation tours on arrival
- Allocating parking on the premises or alternative arrangements to facilitate older people and those with a Blue Badge
- Design and maintenance of furniture and fittings that are part of the accessibility provision of a room
- Providing, maintaining and reserving equipment, such as mobile hoists, hearing loops, shower and bath seats, etc

- Arrangements for making standard equipment accessible for example by indicating unimpeded access to curtains, and storage of spare linens within reach of a wheelchair user
  - Means of escape procedures
  - Encouraging feedback from disabled guests
  - Reviewing the AMP.
-

## APPENDIX C POTENTIAL LOCAL INDICATORS TO IDENTIFY NEED FOR AFFORDABLE SMALL SHOPS

Analysis	Comments
Overall average unit size	High level indicator
Analysis of unit sizes	More detailed analysis is required to understand the spread of unit sizes in a centre and identify the overall proportion of small shops in a centre. Unit size information, can be broken down into size bands. This can be supplemented by the same analysis, but for different types of occupiers to understand which types of occupiers occupy small units e.g. is current convenience store provision in large or small units.
Prime Zone A rental value (per sq m)	High level indicator
Analysis of Zone A rental value (per sq m)	More detailed analysis is required to understand how "affordable" current rents in a centre are. A starting point could be analysing the spread of Zone A rents in a centre. The VOA provides its opinion on Zone A rents for all retail properties to calculate rateable values. The most recent rating list is 2010, with an effective valuation date of 1st April 2008. The rating list is currently updated every 5 years. This information can be supplemented by discussions with local agents. High Zone A rental values may indicate areas are unaffordable and this information can be related to the types of occupiers to see if only certain types of retailers e.g. fashion multiples can afford such rents.
Analysis of overall rental values	Further analysis can be undertaken on overall rental values. VOA can again be used in this respect. The VOA's rateable value is in broad terms is a professional view of the annual rent for a property if it was available on the open market on a set date. Again this information can be related to the types of occupiers to understand the level of rent independent retailers are able to pay in the centre.
Proportion of multiples	High level indicator
Occupancy rate	High level indicator
Analysis of vacant units	Analysis of which areas of a centre have relatively high vacancy rates can be used to understand vitality and viability issues. It can also help identify which types of small units are performing well in a centre e.g. are small units in prime shopping areas occupied by multiples well occupied, whereas other areas are struggling? Identifying the reasons for the vacancy from sources such as retail agents can also provide useful information e.g. are independent retailers struggling to pay rental levels?
Provision of local/community services	Identify floorspace providing local services such as pharmacies, dry cleaning, grocers etc. An Index can be used in retail healthchecks, and then compared with other centres and monitored over time.
Yields	Yields are an indicator of investment value. Higher yields indicate higher risks, less institutional interest and greater potential for non-institutional ownership, with weaker covenants (often occupied by independents). Data is not always readily available outside prime areas.

Source: London Small Shops Study 2010

## **APPENDIX D: OFFICE PARKING ASSESSMENT MATRIX**

The matrix shows how the tests set out in London Plan Policy 6.13E (d) could be applied in practice. To do so it subjects a series of 10 dummy locations (each of which was ascribed a set of different characteristics) to the same tests as set out in 6.13E (d).

It aims to show how different types of evidence could be employed in making the case that the exceptional higher parking allocation should be adopted in a given location, and that the process need not be excessively technical or complicated.

The conclusions for each dummy location also demonstrate that the final determination is a matter of judgement, not necessarily requiring every test to be comprehensively met in order to justify some of the regular office parking standards being exceeded.

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Closer to boundary of GLA area



	Location 1	Location 2	Location 3	Location 4	Location 5	Location 6	Location 7	Location 8	Location 9	Location 10
Is the location in an area of recognised deprivation? (top 20% in the UK)	Pockets of deprivation	Small pockets of deprivation	Significant deprivation	Small pockets of deprivation	Pockets of deprivation	Not in top 20% most deprived locations	Significant deprivation	Small pockets of deprivation	Pockets of deprivation	Not in top 20% most deprived locations
Is the location identified in table A2.1 of the London Plan as being in need of regeneration?	No	No	Yes	No	Yes	No	Yes	Yes	No	No
Are there brown field sites in need of redevelopment?	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Is the area identified as being in need of regeneration in borough DPDs?	Yes	No	Yes	Yes	No	Yes	No	No	Yes	Yes
Existing congestion	Site by site, should be mindful of issues on likely approach roads	Significant congestion in the locality means caution is required	Impact on the highly-congested routes nearby means relaxation should be avoided until that issue is alleviated	Congestion on major roads and local distributor roads means caution is required	Congestion on major roads means caution is required	Case by case, but with good traffic management plans and commitment to take pro-cycling measures some relaxation should be possible	Case by case, consider impact on major orbital and radial routes	No major issues, but should take care not to exacerbate existing junction pressure, case for seeking contributions to alleviate this?	Less of an issue in the outer parts of the site, but given key junction constraints, tighter controls should persist there until that bottleneck is addressed	No evidence of significant congestion on roads in or approaching the area
No significant adverse impact on congestion and air quality	Relatively high levels of air quality pollution in the area	Relatively high levels of air quality pollution in the area	General and localised issues	Relatively high levels of air quality pollution in the area	Relatively high levels of air quality pollution in the area	Some relatively high levels of pollution on approach roads	orbital and radial routes somewhat problematic, upper third of area much better	Few air quality issues in the area	Outer area less problematic than inner. Consider mitigation for issues on major roads.	Few air quality issues in the area
Likely traffic generation	High	Low	High	Low	High	Low	High	Low	Low	Low
A lack (now and in the future) of public transport investment	The site is already extremely well connected	Despite good public transport access to the site boundary, access into the site is limited	Variable public transport access necessitates a site-by-site approach	Variable public transport access necessitates a site-by-site approach	Variable public transport access necessitates a site-by-site approach	Relatively low public transport access to site	Variable public transport access necessitates a site-by-site approach	Relatively low public transport access to site	Generally no issue, though should avoid relaxing standards close to Underground Station	Relatively low public transport access to site
A lack of existing on or off street parking	Yes - space is insufficient for likely car use requirement	Yes - space is insufficient for likely car use requirement	No	No	No	Yes - space is insufficient for likely car use requirement	No	Yes - space is insufficient for likely car use requirement	Yes - space is insufficient for likely car use requirement	No
A commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above minimum thresholds	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes
A requirement, via Travel Plans, to reduce provision over time	No	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes
Indicative conclusion	More generous standard appears inappropriate based on one or more criteria									
	Some potential relaxation of London Plan standards - however, not to the full extent. i.e. Some relaxation potentially permissible, but not the full shift from 1 space per 100m <sup>2</sup> to 1 space per 50m <sup>2</sup> .									
	Full relaxation of office parking standards to 1 space per 50m <sup>2</sup> feasible at a strategic level. Detailed design of access arrangements etc. and appropriate planning conditions required									



## Appendix E SOLDC implementation guidelines

SOLDC Implementation Guidelines	
1	<p><b>Uxbridge</b></p> <ul style="list-style-type: none"> <li>• Promote strategic function in Higher Education associated with Brunel University (including its academic schools and specialist research centres) and Uxbridge College</li> <li>• Complete the £300 million University campus redevelopment programme and exploit the potential of its impressive range of modern, state-of-the-art facilities</li> <li>• Develop opportunities for business collaboration at Brunel including research, consultancy and knowledge transfer partnerships</li> <li>• Support development of Brunel Science Park and promote innovation and enterprise, linked to the university</li> <li>• Support town centre redevelopment/extension and promote as a commercially competitive location including retail and offices</li> <li>• Promote the redevelopment of the RAF Uxbridge site, together with its potential in the bioscience sectors and creative/media support services in the Uxbridge Business Park</li> <li>• Implement transport and other planned infrastructure including Piccadilly line and Metropolitan line upgrade</li> </ul>
2	<p><b>Hillingdon/Hounslow</b></p> <ul style="list-style-type: none"> <li>• Hounslow to build on its cluster of media related industries which require a mix of industrial and office premises as well as its strengths in logistics hubs</li> <li>• Hillingdon and Hounslow both have strategic functions in leisure tourism, logistics and other transport related functions associated with connections to Heathrow</li> <li>• Implement London Plan Opportunity Area objectives for Heathrow</li> <li>• Promote and enhance competitiveness of the Strategic Industrial Locations north and south of airport providing logistics capacity</li> <li>• Implement transport and other planned infrastructure including Crossrail and Piccadilly line upgrade</li> </ul>
3	<p><b>Wembley</b></p> <ul style="list-style-type: none"> <li>• Develop strategic functions for leisure, tourism, arts, culture and sports associated with the iconic Wembley stadium complex, Arena and Conference Centre</li> <li>• Implement London Plan Opportunity Area objectives including significant potential for new housing and leisure related development</li> <li>• Deliver transport and other planned infrastructure including Metropolitan line and Bakerloo line upgrade</li> <li>• Realise potential to improve links between stations and strategic leisure facilities and enhance the vitality, viability and regeneration of the town centre.</li> </ul>
4	<p><b>Brent Cross</b></p> <ul style="list-style-type: none"> <li>• Strategic Function in retailing and, subject to demand, strategic office development</li> <li>• Potential for redevelopment and evolution to become a new Metropolitan town centre (in line with London Plan and adopted Development Framework) subject to implementation of a wider mix of uses and complementing the roles of other town centres nearby</li> <li>• Planning approval for new homes and offices and the expansion of the Brent Cross shopping centre</li> <li>• Implement transport and other planned infrastructure including Thameslink and Northern Line upgrade. Proposed rail station on Cricklewood site.</li> <li>• Implement improvements to the business environment and public realm including restoration of the River Brent</li> </ul>

<b>SOLDC Implementation Guidelines</b>	
5	<p><b>Park Royal</b></p> <ul style="list-style-type: none"> <li>• Promote strategic functions including logistics, industry/green enterprise (including waste management) and media (parts)</li> <li>• Implement London Plan Opportunity Area objectives (OAPF published) and support improvements to the attractiveness and competitiveness of this Strategic Industrial Location</li> <li>• Support growth and prosperity of existing and new businesses and associated employment</li> <li>• Create a sustainable business environment and public realm</li> <li>• Support the development of Park Royal Business Improvement District</li> <li>• Implement transport and other planned infrastructure including Piccadilly line upgrade and improvements to rail freight capacity (subject to funding)</li> <li>• Consider implications for land use arising from improvements to strategic rail accessibility, including HS2.</li> </ul>
6	<p><b>White City</b></p> <ul style="list-style-type: none"> <li>• Build upon strategic function in media</li> <li>• Implement London Plan Opportunity Area objectives for new jobs and housing (draft OAPF published) and develop a new hub for creative industries, leisure, media and innovation anchored by some of the world's greatest institutions including the BBC and Imperial College London</li> <li>• The consolidation of BBC activities will create opportunities for further development, building upon the area's strengths in creative, media and entertainment business alongside bio-tech and high-tech enterprise</li> <li>• Development of offices, hotels, and flexible work spaces to allow the continued growth of these sectors</li> <li>• Link cutting edge business and academic research with schools and colleges</li> <li>• Complement media function with the potential expansion of the metropolitan town centre in the area south of the Hammersmith &amp; City Line viaduct as an opportunity for provision of retail, housing and major leisure uses</li> <li>• Implement transport and other planned infrastructure including Hammersmith and City and Circle line upgrades and assessment of congestion reduction options.</li> </ul>
7	<p><b>Richmond</b></p> <ul style="list-style-type: none"> <li>• Build upon strategic functions in leisure, tourism, arts, culture and sport</li> <li>• Enhance existing tourist attractions, such as Kew Gardens, Hampton Court Palace, Ham House and the River, including sport stadia particularly those of RFU and Harlequins</li> <li>• Enhance the quality and range of the visitor offer associated with Richmond town centre and wider Strategic Cultural Area</li> <li>• Promote development to support the role, vitality and function of Richmond town centre (London Plan Major town centre) and direct new hotels to the Borough's town centres or other areas highly accessible by public transport</li> <li>• Promote sustainable transport for tourists to and within the borough, including the passenger services along the Thames</li> <li>• Implement transport and other planned infrastructure including District line upgrade and South-West Trains train lengthening</li> <li>• Deliver qualitative improvements to the public realm and built environment in areas leading to and around tourist destinations.</li> </ul>

<b>SOLDC Implementation Guidelines</b>	
8	<p><b>Kingston</b></p> <ul style="list-style-type: none"> <li>• Develop strategic functions in higher education, leisure, tourism, arts and culture.</li> <li>• Enhance sub-regional roles played by Kingston University and Kingston College in the local economy, providing education and training, employment, social and cultural activities</li> <li>• Deliver additional space, new and upgraded facilities to support continued offer of high quality education and skills training</li> <li>• Work in partnership with the University to help deliver suitable managed student accommodation</li> <li>• Promote tourism and enhance visitor attractions particularly in Kingston Town Centre and along the River Thames and at Chessington World of Adventures</li> <li>• Deliver improved cycle facilities as part of the ‘mini Hollands’ programme</li> <li>• Promote sustainable transport for tourists to and within the borough, including the passenger services along the Thames</li> <li>• Promote development to support the role, vitality and function of Kingston town centre (London Plan Metropolitan town centre) and implement the K+20 Area Action Plan</li> <li>• Exploit potential of the Kingston First Business Improvement District.</li> </ul>
9	<p><b>Wandle Valley</b></p> <ul style="list-style-type: none"> <li>• Stengthen and develop strategic functions in leisure, tourism, art, culture, sport and industry</li> <li>• Promote development of the Wandle Valley Regional Park and associated network of accessible open spaces including the All London Green Grid</li> <li>• Address deficiencies in access to recreational facilities through the development of the Regional Park to incorporate Beddington Farmlands and Beddington Park in Sutton, together with open spaces adjoining the River Wandle in Wandsworth, Merton and Croydon</li> <li>• Co-ordinate the development and implementation of London Plan and local policies in the Wandle Valley regeneration corridor including those parts outside of London towards Gatwick</li> <li>• Implement transport and other planned infrastructure including Thameslink upgrade, bus and cycle improvements, and potential extensions and/or capacity increases to Tramlink subject to funding.</li> </ul>
10	<p><b>Upper Lee Valley / Enfield</b></p> <ul style="list-style-type: none"> <li>• Develop strategic functions in leisure, tourism, arts, culture and sports; and in logistics, industry and green enterprise</li> <li>• Implement London Plan Opportunity Area objectives (OAPF adopted July 2013).</li> <li>• Co-ordinate regeneration with transport and other planned infrastructure including Tottenham Hale station, gyratory and bus station improvements, Victoria line upgrade, station upgrades and refurbishments (STAR); and Crossrail 2 (subject to funding). A four trains per hour service on the West Anglia Main Line and potential four-tracking of the London Stansted line will be important in unlocking development capacity, particularly at Meridian Water</li> <li>• Secure the future of the Lee Valley Athletics Centre at the Picketts’ Lock site as a regional leisure and sporting centre with a range of activities and programmes</li> <li>• Extend Olympic legacy offers, possibly in coordination with authorities adjacent to London and as part of wider measures to develop the attractions of the Lee Valley Regional Park (LVRP)</li> <li>• Realise the potential of the LVRP’s extensive underused riverside sites as well as many protected wildlife habitats in need of enhancement for sport, leisure, entertainment and nature conservation</li> <li>• Improve access to and through the varied landscape of river, reservoirs and open spaces and reinforce the unique setting and identity of the Upper Lee Valley</li> </ul>

<b>SOLDC Implementation Guidelines</b>	
	<ul style="list-style-type: none"> <li>• Enhance the quality and range of the visitor offer associated with the Strategic Cultural Area</li> <li>• Co-ordinate development as an important component of the London-Stansted-Cambridge-Peterborough growth corridor</li> <li>• Provide essential capacity for logistics and related functions</li> <li>• Improve strategic and local transport links to Freezywater industrial area</li> <li>• Secure the economic benefits of the Edmonton Eco Park, waste management and associated green industries including direct job creation, business operations linked to the re-use of by-products and potential energy and heat generation benefits</li> <li>• Explore potential for Green Enterprise District.</li> </ul>
11	<p><b>Stratford / Lower Lea Valley (LLV)</b></p> <ul style="list-style-type: none"> <li>• Develop and strengthen strategic functions in retail, leisure, tourism, arts, culture and sports, higher education and strategic offices</li> <li>• Secure the full potential of the legacy of the 2012 Olympic and Paralympic Games as set out in the Olympics Legacy SPG</li> <li>• Capitalise on the quality and range of the unique leisure, cultural, sporting and visitor offer associated with the Queen Elizabeth Olympic Park, the ArcelorMittal Orbit, the retained Olympic venues, Stratford's retail and entertainment quarter and other facilities/attractions in the wider Strategic Cultural Area</li> <li>• Secure the integration of retail, leisure and office development at Stratford City with the existing town centre and realise an enhanced Metropolitan role for the town centre</li> <li>• Realise the potential of sectors with strong prospects of sustained economic growth, such as digital, creative and cultural industries, green enterprises, retail, offices and leisure</li> <li>• Promote strategic function in Higher Education associated with University College London, Birkbeck College, the University of East London and the Building Crafts College</li> <li>• Support the further expansion of educational institutions</li> <li>• Secure Stratford's potential as part of London's strategic office reserve</li> <li>• Implement transport and other planned infrastructure including Crossrail, DLR three-car network upgrade and double tracking, a new station at Pudding Mill Lane, and West Anglia Lea Valley four-tracking (STAR) leading to increased frequencies to Stansted and local service to Stratford.</li> </ul>
12	<p><b>Royal Docks</b></p> <ul style="list-style-type: none"> <li>• Maximise the benefits of Crossrail to deliver regeneration and address deprivation throughout the Royals including at Canning Town, Custom House and Silvertown Quays</li> <li>• Maintain the attractiveness of City Airport to business and visitors whilst enhancing its environmental performance in line with London Plan Policy 6.6</li> <li>• Realise London Plan Opportunity Area objectives, including those for new homes and jobs</li> <li>• Capitalise on the success of ExCel and its potential as a focus for business/visitor related growth</li> <li>• Promote access to the airport by sustainable means, particularly by public transport</li> <li>• Implement DLR upgrades to enable three-car services across the OA</li> <li>• Address severance and barriers to travel to, from and within the OA, including across the River Thames.</li> </ul>
13	<p><b>Greenwich (parts)</b></p> <ul style="list-style-type: none"> <li>• Sustain and strengthen strategic functions in leisure, tourism, arts, culture, sports and higher education</li> </ul>

<b>SOLDC Implementation Guidelines</b>	
	<ul style="list-style-type: none"> <li>• Implement London Plan Opportunity Areas objectives for Greenwich Waterfront/Creekside and Greenwich Peninsula.</li> <li>• Enhance the quality and range of the internationally significant leisure, cultural, sporting and visitor offer associated with West Greenwich, the Maritime Greenwich World Heritage Site, the O2 and other facilities/attractions in the wider Strategic Cultural Area</li> <li>• Implement transport and other planned infrastructure including DLR upgrade to three-car services, South Eastern Trains train lengthening</li> <li>• Recognise the potential for a cruise liner terminal and the role of safeguarded wharves</li> <li>• Secure improvements to the public realm including river paths, parks and squares</li> <li>• Promote strategic function and development in higher education associated with the University of Greenwich, Trinity College of Music at the Old Royal Naval College in Greenwich, Ravensbourne college and Greenwich Community College.</li> </ul>
<b>14</b>	<p><b>Croydon</b></p> <ul style="list-style-type: none"> <li>• Promote strategic functions for offices and higher education</li> <li>• Support the renewal, modernisation and consolidation of the office stock in the most viable locations appropriate to its role as one of two strategic office centres in Outer London</li> <li>• Re-brand Croydon to meet modern commercial needs, realising its competitive advantages and good public transport accessibility</li> <li>• Complement commercial office function with high quality retail, leisure and new forms of urban living including the redevelopment of the Whitgift</li> <li>• Support mixed use re-development and carefully manage conversion of surplus office capacity to other uses including housing</li> <li>• Support the growth and improvement of further and higher education in the borough and in particular seek to bring a University to Croydon to be a centre for innovation, enterprise and associated employment.</li> <li>• Define a campus location at a suitable site with high public transport accessibility</li> <li>• Implement London Plan Opportunity Area objectives and the Opportunity Area Planning Framework</li> <li>• Implement transport and other planned infrastructure including Thameslink upgrade, East and West Croydon station improvements (to be funded through neighbouring development proposals), Croydon tram additional rolling stock / higher frequencies; bus and cycle improvements; and Wellesley Road improved urban realm and pedestrian crossings</li> <li>• Enhance the business environment and traffic management</li> <li>• Exploit potential of the Croydon Business Improvement District and Mayoral Outer London regeneration funding.</li> </ul>
<b>15</b>	<p><b>Biggin Hill</b></p> <ul style="list-style-type: none"> <li>• Strategic function in ‘other Transport Related Functions’ as an important sub-regional hub for aviation and related high-tech industry</li> <li>• Develop a positive planning framework to support economic growth activities at Biggin Hill Airport and the adjoining industrial area</li> <li>• Enhance environmental performance of the airport in line with London Plan Policy 6.6</li> <li>• Review appropriate constraints through the local plan process including accessibility, Green Belt (London Plan Policy 7.16) and heritage designations whilst maintaining environmental quality</li> <li>• Support partnership working with education and training providers related to aviation and high-tech industry</li> </ul>



<b>SOLDC Implementation Guidelines</b>	
	<ul style="list-style-type: none"> <li>• Explore potential for development of aviation academy, airport heritage centre and a hotel/leisure hub of a scale appropriate to serve the airport and wider cluster.</li> </ul>
16/17	<p><b>London Riverside (Barking &amp; Dagenham and Havering)</b></p> <ul style="list-style-type: none"> <li>• Develop strategic functions logistics, industry and green enterprise</li> <li>• Implement London Plan Opportunity Area objectives (draft OAPF published)</li> <li>• Promote and enhance competitiveness of the Strategic Industrial Locations providing logistics capacity including Dagenham Dock, Rainham Employment Area, Rippleside and River Road</li> <li>• Promote the Green Enterprise District incorporating the London Sustainable Industrial Park at Dagenham Dock</li> <li>• Support provision of strategically important logistics facilities, including inter-modal freight transfer (potentially at Renwick Road/Ripple Road), break-bulk and consolidation centres</li> <li>• Consolidate strengths in modern manufacturing excellence and develop as a leading centre of innovation and for the growth sector of environmental technology</li> <li>• Implement transport and other planned infrastructure including train lengthening on C2C railway and improvements to rail freight capacity</li> <li>• Realise full potential of Safeguarded Wharves for sustainable movement of freight by River</li> <li>• Exploit opportunities for investment through the Rainham Employment Area Business Improvement District.</li> </ul>
18	<p><b>Havering</b></p> <ul style="list-style-type: none"> <li>• Build upon strategic function in higher education associated with Havering College of Further and Higher Education (including campuses at Hornchurch, Harold Hill and Rainham)</li> <li>• Develop links with businesses and employers including the Havering Skills Academy based in Romford</li> <li>• Promote development to support the role, vitality and function of Romford town centre (London Plan Metropolitan town centre)</li> <li>• Implement planned infrastructure including Crossrail.</li> </ul>
19	<p><b>Bexley Riverside</b></p> <ul style="list-style-type: none"> <li>• Develop strategic functions industry and green enterprise</li> <li>• Implement London Plan Opportunity Area objectives</li> <li>• Promote and enhance competitiveness of the Strategic Industrial Locations including Belvedere Industrial Area and Erith Riverside which provide capacity for industry, logistics and for the growth sector of environmental technology</li> <li>• Implement transport and other planned infrastructure including Crossrail to Abbey Wood and South Eastern Trains train lengthening</li> <li>• Realise full potential of Safeguarded Wharves for sustainable movement of freight by River.</li> </ul>
20	<p><b>Bexley (parts)</b></p> <ul style="list-style-type: none"> <li>• Develop strategic function in logistics</li> <li>• Implement London Plan Opportunity Area objectives</li> <li>• Promote and enhance competitiveness of the Strategic Industrial Locations providing logistics capacity, in particular at Thames Road</li> <li>• Support provision of strategically important logistics facilities, including inter-modal freight transfer, break-bulk and consolidation.</li> </ul>

## APPENDIX F. GLOSSARY

### **Business Improvement Districts (BIDs)**

- precisely defined geographical areas within which the businesses have voted to invest collectively in local improvements to enhance their trading environment.

**Catchment area** - the area and population from which a facility or region attracts visitors or customers.

**Comparison goods retail** - Shopping for items such as clothes, music, household and leisure goods which are not bought on a regular basis.

**Convenience goods retail** - Shopping for everyday, essential items like food, drink, newspapers and confectionary.

**Edge-of-centre** - For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

**Land use 'credit'**: New off-site residential provision is provided in advance by a developer on the basis that it could be used to satisfy the residential requirements of mixed use policies generated by future commercial development.

**Land use 'swap'**: A developer provides an off-site residential development to satisfy the housing requirement generated by a specified office/commercial development. The planning applications for the two sites are considered at

the same time by the planning authority and are linked by S.106 agreement or planning condition.

**Lifetime neighbourhood** - places where, in view of an aging society, transport, basic amenities, green spaces, decent toilets, and places to meet and relax, are consciously planned for people of all ages and conditions in mind within easy reach of homes, accessible to all and planned into proposals at the outset.

**Main town centre uses** - Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Multi-channel retailing** - A retail strategy that offers customers a choice of ways to buy products including for example, physical stores, online, mobile stores, mobile app stores, click-and-collect services, telephone sales, mail orders, interactive television and comparison shopping sites.

**Out-of-centre** - A location which is not in or on the edge of a centre but not necessarily outside the urban area.

**Primary Shopping Area** - Defined area where retail development is concentrated and used for the application of strategic and local policy.

**Primary and secondary frontages** - Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary

frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

**Public Transport Accessibility Level (PTALs)** - a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. The method is essentially a way of measuring the density of the public transport network at a particular point.

**Secondary Shopping Area** - Locations providing for a wider mix of retail and non-retail town centre uses.

**Sequential approach** - Planning policies that require particular steps to be taken, or types of location or sites to be considered, in a particular order of preference. For example retail, commercial and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport.

**Sequential test (see 'Sequential approach')**

**Small shop** - a shop with a gross floorspace of, typically, up to 80 square metres.

**Special forms of trading** - includes spending that does not go through retail outlets, for example internet shopping, mail order, spending at market stalls and door-to-door sales people.

**Service retail** - includes for example, services such as hairdressing, beauty salons, launderettes, dry cleaners, post office, clothing hire, opticians, travel agents, filling stations

and vehicle rental.

**Strategic Outer London Development Centre (SOLDC)** - locations in outer London or adjacent parts of inner London with one or more specialist strategic economic functions of greater than sub-regional importance.

**Town centre** - the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development; the structure for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners, particularly by public transport, cycling and walking; and the main foci for most Londoners' sense of place and local identity within the capital (together with local neighbourhoods).

**Under-served area** - area with poor levels of access to provision or choice in a range of services including food retailing.

## APPENDIX G – FURTHER LINKS AND SIGNPOSTS

### Mayor's Action for High Streets

<http://www.london.gov.uk/priorities/regeneration/high-streets>

### Accommodating Growth in Town Centres.

Report by Maccraenor Lavington/Peter Brett for the GLA, 2014 (forthcoming) provides several examples of approaches and mechanisms to accommodate housing in town centres and the availability of low threshold enterprise space, especially for SMEs.

### Culture in the High Street Mayor of London.

<http://www.london.gov.uk/priorities/arts-culture/promoting-arts-culture/culture-on-the-high-street>

### Mayor's Cultural Strategy 2014 update

uses the Ministry of Sound as a case study to show how, through imaginative and sensitive planning, it is possible to create and sustain successful town centres in which the creative industries, busy nightlife and residential areas can coexist (page 41). The strategy update also provides examples of how creative businesses and cultural organisations can help shape and improve town centres (pages 88-91)

[https://www.london.gov.uk/sites/default/files/1065\\_CulturalStrategy2014\\_4web\\_1.pdf](https://www.london.gov.uk/sites/default/files/1065_CulturalStrategy2014_4web_1.pdf)

### London Assembly Planning Committee

**Report** (includes case study and good practice examples) <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/response-to-the-mayors-supplementary-planning-guidance-for-town>

### Night time economy:

London Borough of Camden's Revised Planning Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses, adopted October 2007

ATCM Purple Flag accreditation:

<https://www.atcm.org/programmes/purple-flag/WelcometoPurpleFlag>

### Inclusive arts, culture and leisure

*Attitude is Everything* - an organisation which works to improve deaf and disabled people's access to live music by working in partnership with audiences, artists and the music industry to implement a Charter of Best Practice across the UK. Details at: <http://www.attitudeiseverything.org.uk>

*The Arts Council England* who provide various guidance documents on access and inclusion in the arts. Details at: <http://www.artscouncil.org.uk>

*Disability Arts online* - an online journal for the discussion of arts and culture. Details at: [www.disabilityartsonline.org.uk](http://www.disabilityartsonline.org.uk)

*ISAN Access Tool Kit* - a guide to presenting accessible live events and festivals in town centres, produced by the Independent Street Arts Network. <http://www.isanuk.org/downloads/ISAN%20Access%20Toolkit-1.pdf>

*London 2012 Cultural Olympiad*. This is the largest cultural celebration in the history of modern Olympic and Paralympics Movements and includes information on 'Unlimited' which is a celebration of arts, culture and sport by deaf and disabled people. Details at: <http://www.london2012.com/about-us/cultural-olympiad>

### Association of Town and City Management

<https://www.atcm.org>

The ATCM, British Council of Shopping Centres, the British Retail Consortium and the British Property Foundation are working to offer advice and mentoring of the successful Town Team pilots.

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**Town centre deliveries and servicing**

TfL guidance to freight operators regarding safe and legal parking and unloading  
<http://www.tfl.gov.uk/info-for/freight/moving-freightefficiently/parking-and-loading>;  
detailed guidance document: <http://www.tfl.gov.uk/cdn/static/cms/documents/parking-and-loading-legally.pdf>

TfL guidance on design of kerbside loading facilities:  
<http://www.tfl.gov.uk/info-for/freight/moving-freight-efficiently/parking-and-loading>; detailed pdf guidance document:  
<http://www.tfl.gov.uk/cdn/static/cms/documents/tfl-kerbside-loading-guidance-2009.pdf>;

Freight impact assessments (such as the Street Audit: Freight module, formerly known as the Freight Environment Review System) Factsheet:  
<http://www.tfl.gov.uk/cdn/static/cms/documents/fers-information-sheet.pdf>

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### Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

### Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

### Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

### Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਖਤਾ ਕਰੋ:

### Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

### Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

### Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

### Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

### Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

**MAYOR OF LONDON**