

JUST SPACE ECONOMY AND PLANNING (195)

WRITTEN STATEMENT ON THE INSPECTOR'S FINAL MATTERS

Session 7: Retail & Town Centres

a) The FALP at paragraph 4.40 identifies a need for between 0.4 to 1.6 million m² of comparison goods retail floorspace by 2036. Is this based on robust evidence and does the FALP provide an adequate steer with regard to the location of this new floorspace?

Proposed amendments to the FALP:

JSEP disagrees strongly with the future assessment of London's retail sector. JSEP also disagrees that consolidation will need to occur except in the very largest and smallest town centres. We explain why in our response to the FALP consultation, and argue that the proposed alterations should be withdrawn pending a review of the evidence base.

Further information:

Nothing further to add at this point to JSEP's response to the FALP consultation. We hope to be able to expand during the Examination in Public, in particular in relation to the GLA's 2013 Town Centre Health Check document and 'Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street diversification', which has not yet been possible due to late release of those documents.

b) The FALP envisages a structural change in retail provision driven largely by changes in the way people shop (internet, multi channel shopping etc) and leading to, amongst other things, the expansion or strengthening of some centres and the decline of others. Are the proposed alterations to Policies 2.15, 4.7 and 4.8 (and the supporting reasoned justification) sufficient to manage these changes particularly where centres are declining to ensure that they remain viable and vital? (commensurate to their function and place in the hierarchy).

Proposed amendments to the FALP:

As described in response to Matter 7a and in JSEP's response to the FALP consultation, we do not agree with the analysis of the future of retail in London nor the suggestion that retail will need to consolidate in all but the smallest and the largest retail centres. We argued that the FALP are likely to undermine the health of town centres, actively producing decline rather than supporting viability and vitality. We propose the alterations to Policies 2.15, 4.7 and 4.8 and relevant elements of supporting text are removed, pending a review of the evidence base.

Further information

Just Space Economy and Planning (JSEP) has already presented significant evidence to challenge the idea which seems to have emerged from the Experian retail review that only Westfield-type retail developments can secure a viable future for retail in a few of the largest town centres, with consolidation required in middle level centres. A wide range of evidence and policy initiatives are presently demonstrating the importance of town centres and high streets, and their adaptability and flexibility. Independent shops are flourishing in many London town centres, and vacancy rates are low. JSEP strongly disagrees with the question's suggestion that middle-level town centres in London are declining. JSEP's view is that the proposed alterations to policies 2.15, 4.7 and 4.8 in fact would have the result of weakening town centres and causing their decline, rather than ensuring they remain viable and vital.

The analysis presented by JSEP re: the GLA's report, Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street diversification, in response to Matter 6b is also very relevant here and strengthens the argument presented by JSEP.

We will expand further during the Examination in Public, highlighting in particular the role of existing enterprises in shaping vibrant and vital medium-sized town centres, such as the Latin retailers at Elephant and Castle.

c) Are the changes to the status of the centres highlighted or struckthrough in Table A2.1 justified by evidence? (Including Policy Directions and Office Guidelines)

Proposed amendments to the FALP:

We oppose the downwards-designation of town centres which will lead to the loss of existing shops, businesses and services.

Further information:

We hope to expand on the JSEP response to the consultation on this matter at the Examination in Public.

d) The NPPF states that residential development can play an important role in ensuring the vitality of town centres. In promoting high density residential development in town centres should Policy 2.15c recognise that this should not be at the expense of the viability and vitality of town centres?

Proposed amendments to the FALP:

JSEP agrees that the FALP should be clarified to confirm that residential-led development in town centres should not damage their viability and vitality. We propose a further amendment that would require councils to work with existing businesses to ensure they are able to return to any new developments. We suggest that consideration is also given to similar alterations being included in relation to the proposed alterations to office and industrial space policies and in the relevant Chapter 2 alterations (see JSEP response to the FALP consultation and responses to other matters).

Further information:

Just Space Economy and Planning (JSEP) has already set out a range of evidence detailing cases where existing businesses are at risk of displacement through development schemes that do not recognise their contributions to the vitality of their town centre. This has been the case, for example at Wards Corner in Haringey; Queen's Market in Newham; and in Elephant & Castle and Peckham in Southwark. We also described the ongoing work of the People's Empowerment Alliance of Custom House (PEACH) to secure a future for existing shopkeepers in a major housing-led regeneration scheme in Custom House. This case demonstrates the steps that need to be taken to ensure that existing businesses, valued by the local community and contributors to the vitality of town centres and high streets, are not displaced by housing-led developments in town centres. We hope to expand on this evidence at the Examination in Public.

e) Should public houses be specifically mentioned in Policy 4.8Bc?

Proposed amendments to the FALP:

JSEP supports this proposal. Policy 4.8Bc should go further, however, in recognising the community value of other sorts of businesses such as small shops and markets, for example,

Further information:

Public houses, small shops and markets, amongst other businesses, are increasingly being listed as assets of community value by local councils, demonstrating the value that local businesses often have to local residents and community groups. Further policy support for retaining such community assets would be useful, given the pressure to develop such buildings for housing. This is the case in relation to the Baring Hall Hotel in Grove Park, Lewisham, for example, which was listed as an asset of community value (ACV) after it was sold to the company Antic Ltd. The pub remains vulnerable due to partial demolition for housing because planning officers said ACV status was not material due to the fact that the building would remain a pub. There is another example of a pub in the same borough where ACV status was cited as not relevant because the application to turn it into a supermarket included a lease less than 25 years. There is a strong case for strengthening ACV status in the London Plan so that ACV status can be considered a material consideration in all applications related to public houses.

Policy 4.8Bc should go further, however, in recognising the community value of other sorts of businesses such as small shops and markets, for example, Public houses are just one example of businesses that are often valued by the local community and can be listed as assets of community value by local authorities. The indoor market at Wards Corner, Seven Sisters, is now listed by Haringey Council as an asset of community value, for example, and an application was also recently made to list Queen's Market in Newham. JSEP therefore proposes that small shops and markets are also listed alongside public houses as examples of businesses which have community value within Policy 4.8Bc.

^[1] Also the Plan at paragraph 1.28 says that making sure that Londoners can get better access to the jobs in their city will be a key priority.