

Chapter 2: Spatial Development Patterns

The London Plan is the Mayor's statutory Spatial Plan, which is mandated to integrate his various policies in a spatial perspective.

We argue that this chapter is not only the core of the statutory requirements of this London Plan, but also at the heart of the consistent failure of the London Plan to deliver. We see a continuation and indeed entrenchment and exacerbation of the main features of spatial planning in London, which have had extremely negative effects in the past, and which on the basis of our experience and evidence as communities across London will continue to produce bad outcomes as a result of this plan. How long can the current model continue destroying at random existing assets and council housing to try to maximise the finances to pay for development, while failing to deliver what Londoners need?

The Spatial Plan presented in this Chapter is fragmented and opportunistic, with multiple overlapping and contradictory spatial elements. It sets in place a framework for physical development and for funding development which is fundamentally unable to effectively deliver the policy proposals presented: extraordinarily weak delivery of housing at social rents, poor public spaces, displacement of low income Londoners, destruction of valued community infrastructure and assets. We observe that without a fundamental rethink of the spatial development model this London Plan will see no step change in the failure to deliver the houses and lifetime neighbourhoods that Londoners need; we predict this plan will make things worse for many places and people in the city.

The New London Plan has some familiar features in its approach to spatial planning: ("strategic") **areas for regeneration** are defined as areas within the 20 per cent most deprived LSOAs in England using the Index of Multiple Deprivation – here the focus is on addressing inequality; **Opportunity Areas** are large sites expected to play a significant role in delivering London's future housing and employment – these should "fully realise their potential" (SD1 A) – here the focus is on maximizing delivery of houses and jobs; **Town centres** feature as important new sites of planning concern, with scope for intensification and a stronger emphasis in providing new housing development (Policy SD6 to Policy SD9) – here the focus is on bringing forward new residential and leisure uses for town centres and high streets. **Central Activities Zone** continues to focus on prioritizing international retail, commercial and cultural functions, and seeks protections against office to residential conversions (Policy SD5 F; 2.5.7) - Special Policy Areas may be defined to protect specialist clusters and areas of special cultural heritage.

In addition, and not included in this chapter, is the new suggestion in Policy H1 (B2a), for "**incremental intensification**" (4.2.5) which identifies "sites with existing or planned public transport access levels (PTALs) 3-6 or which are **located within 800m of a Tube station, rail station or town centre**

boundary” ... for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. Maps 4.2 and 4.3 therefore represent another spatial pattern of development which should be considered relevant to Chapter 2 and therefore the maps and discussion of them should be located in this chapter on Spatial Development Patterns; or integrated in the discussion of spatial development patterns. This is particularly important to ensure that different elements of spatial change in the city are consistent in terms of how their differential impacts on neighbourhoods, communities, and existing uses and assets are assessed and treated in policy and delivery.

Overlapping and contradicting spatial development policies

There are, then, various overlapping spatial frameworks which are being imagined here, each with different policy goals, instruments and procedures (e.g. for preparing plans, for enabling participation). We note responses on particular policies in this Chapter but here we make some initial overall observations on the contradictions between the different goals for different spatial elements which in fact overlap and refer to the same places in the city.

Policy SD1

Opportunity Areas are more fully presented in the text of Chapter 2 of the Plan, with some detailed planning diagrams. We hope that this indicates a desire to subject these spatial elements of the plan to proper and effective evaluation. However, a summary table of the housing targets, employment targets and stage of development of the Opportunity Area would be useful for ease of reference and comparison. Unlike the current London Plan, there is no longer an Opportunity Areas annex. Consequently, there is relatively little detailed information on each area. This includes the new OAs which have appeared with no public pre-discussion and ongoing areas where plans for development have reached an impasse because of the failure of the approach being taken – for example at Old Oak, there is no plan in sight for the funding OPDC requires for the “clear strategy for how redevelopment should help to optimize economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners” (2.1.57, p. 48-9).

The 48 OAs, include 9 new ones (some of which are re-classified existing Intensification Areas). New Opportunity Areas are proposed at Clapham Junction, New Southgate, Poplar Riverside, Romford, Hayes, Sutton, Great West Corridor, Kingston, Wimbledon/ Colliers Wood/ South Wimbledon and Wood Green/ Haringey/ Heartlands. **There is no effective process for identifying and designating OAs.** New Opportunity Areas being proposed should have been consulted on at an early stage **before** their designation. As key elements of the London Plan they should be clearly identified and discussed here in some detail, with evidence justifying their designation, so they can be considered and evaluated in the examination process. New Opportunity Areas should be clearly justified against existing land uses, as

should the targets for housing and employment, which are often set at unrealistic and ambitious levels without any consultation or review, without adequate research or justification, and with long term consequences for excessive density and minimal delivery of community and social infrastructure (the ongoing concern of numerous communities across London – see the Grand Union Alliance submission to OPDC Local Plan Reg 19 consultation).

The large role of “Opportunity Areas” in the delivery of the London Plan targets, is at odds with their status as exceptions to both viability norms (their large infrastructure requirements and often very challenging sites to bring forward for development are explicitly excluded from the modelling of the London Plan Viability Study – 5.6.14) and affordable housing norms (as set out in the Mayor’s Affordable Housing and Viability SPG, 2.8.0, 2.8.4). They often lack formal plans (OAPFs are usually SPGs, few are Area Action Plans). And there has never been a systematic review of their operation and outcomes, for example, in relation to delivery of housing at social rent levels, achievement of effective public and open spaces, levels of occupancy and foreign ownership, levels of family housing delivery and no assessment of the value of existing uses in these areas.

We have strong evidence that these developments lead to displacement of existing communities and are not subject to effective requirements for participation in planning processes. These are some of the reasons why Just Space has argued that there should be a moratorium on any new OAs, and no more approvals of OAPFs, until a full public scrutiny has taken place.

We thus anticipate a robust, evidence-based interrogation of the processes and justification for existing and planned new Opportunity Areas in the current examination and review process.

Figure 2.2. The definition of OAs as “Nascent, ready to grow, underway, maturing, mature” is an opaque classification, and reflects the weak relationship between Opportunity Areas and the planning process. A clearer relationship to the planning process should be identified in Figure 2.2, and linked to a much stronger planning approach to OAs, which opens them to effective public consultation, examination and inspection. Thus, legible relevant categories could be: Proposed (by whom? Proposed designation consulted on by when?), Initial Vision (consulted on and reviewed within time frame of?); OAPF (consulted on and adopted); Incorporation in local plan (e.g. with the goal to achieve this within, say, 2 years of designation). It is hugely inappropriate that the largest quantum of development planned for the city should be effectively (un)planned through unexamined Opportunity Area Planning Frameworks.

Policy SD1 Proposed additional Policy text on planning process and participation in OAs: We suggest to combine

SD1 A 3) and SD B 10), with the addition of a stronger version of text 2.1.4, including a timetable for subjecting OAPFs to formal evaluation within the planning system. Thus...

“The Mayor will support and implement adopted planning frameworks, to ensure that at every stage of the planning process, including assessment of existing land uses prior to proposed designation of OAs, these areas of significant development quanta are subject to early and effective public and stakeholder participation*. The Mayor will work closely with relevant local boroughs to speedily incorporate these planning frameworks within local plans to bring forward effective public consultation, evaluation and examination of OA plans. Designation, targets, frameworks and plans for Opportunity Areas must be prepared in a collaborative way with local communities and stakeholders.”

*To ensure full account is taken of small businesses, and others involved in the local economy, this should be made explicit when referring to public participation. Furthermore, A 5 should include “and vibrant and diverse local economies” and in B 5 ‘other industrial capacity’ should be defined i.e. Locally Significant Industrial Sites and non-designated industrial land.

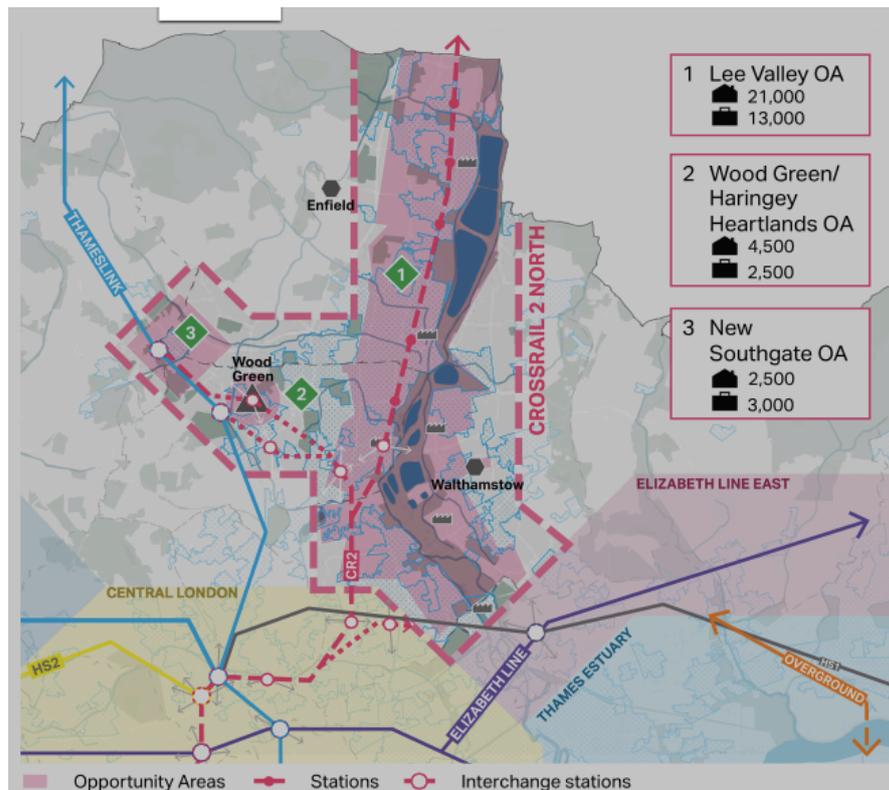
2.1.2. Conflicting policies within Opportunity Areas

Overlap of strategic areas for regeneration with Opportunity Areas is of concern – major redevelopment of the poorest areas in the city to provide the housing and commercial developments imagined for Opportunity Areas, combined with the lack of funding, the prioritization of transport infrastructure in the application of S106 and CIL charges, and weak requirements for social housing in these areas all raise questions about how the ambitions for regeneration can be met in these areas. The Policy suggests to: “Ensure that Opportunity Areas maximize the delivery of affordable housing and create mixed and inclusive communities” (Policy SD1-A-5) or “ensure that Opportunity Areas contribute to regeneration objectives” (SD1-A-6). But this is at odds with the expectation that Opportunity Areas will maximize growth within the fragmented and limited funding regime dependent on S106 and CIL charges and difficult infrastructure challenges of these areas. This is an ineffective goal, likely to lead to removing poor communities, and little re-provision of housing at social rent levels (see below for more detail).

The IIA considered that “It was also recommended that further reference could be made as to how such infrastructure provision could benefit existing communities, as well as new developments within growth corridors and opportunity areas.” (p. 91). The GLA responded that “The GLA advised the purpose of this policy is to draw out any spatially specific considerations that apply to OAs generally and that other policies in the rest of the Plan would also apply; therefore, policies such as public realm, inclusive design, social infrastructure, air quality, green and open space, Healthy Streets and other transport policies addressed issues such as active travel, inclusive design, air quality, provision of open space in more detail. In addition, other GLA

strategies provide further details on some of these issues.”. We note that this list of appropriate planning policies are what are de-prioritised in Policy DF1 D.

The likely equality outcomes in planning terms for Opportunity Areas are marked as unknown in the IIA, against Objective 7: “To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness reducing the need to travel by motorised transport”. We argue on the basis of evidence from many Opportunity Areas that the outcome is known, and that these areas are not producing outcomes which meet that objective.



Opportunity areas and viability

Furthermore, another issue in relation to the overlap amongst these different spatial development categories, all designated for substantial development, is their different treatment in the Plan. It notes, **Figure A1.5** shows overlap between town centres and strategic areas of regeneration, for example, but much stronger statements on participation in regeneration areas are made in the Mayor’s Best Practice Guide for Estate Regeneration, and in some text: “In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in collaboration with local communities, involving a broad spectrum of groups and individuals, to develop a shared vision for the area. Successful regeneration requires all stakeholders to operate in a collaborative way, pooling resources and creating partnerships” (2.10.3). This text should be in the Policy boxes of SD1, SD8 and SD10, as well as in GG1 to guide implementation of the London Plan by

all relevant actors including private developers. At the moment, for example, no such systematic approach to participation has been identified for Opportunity Areas.

We propose a systematic statement on early and effective participation in all spatial planning processes outlined in Chapter 2, and to be integrated with the planning processes in Chapter 4 Housing. We have attached to this submission an evidence base document, [Stronger community participation in regeneration: a paper to inform discussions with the GLA](#).

Policy SD2 Collaboration in the Wider South East (WSE);

Policy SD3 Growth Areas in the WSE and beyond

There are issues about which we are concerned here:

- (1) London is not just part of the WSE, but should have appropriate relationships with the rest of the UK (see Towards a Community-Led Plan for London).
- (2) Local and regional economic geographies, travel to work patterns and costs, as well as wider sustainability would be substantially challenged if the WSE accepts jobs and industrial space, to release space for homes in Greater London (i.e. land swaps and sector swaps).

SD2 E

The approach taken here potentially feeds an imagination in which London considers it can meet housing demand at the expense of other land uses, within its bounds. **The loss of activities and functions intrinsic to London's economy is a grave threat to the long term sustainability of the city through increased travel distances through separation of uses.** SD2 E proposals on the 'export of industrial land' ("substitution of business and industrial capacity where mutual benefits can be achieved") should therefore be firmly resisted. We propose that this be deleted.

SD4 Central activities Zone (CAZ)

This promotes the continued growth of the Central Activities Zone and protection of its agglomeration functions and is mainly 'business as usual'. However, we note the provision for "Special Policy Areas" Policy SD4 G (2.4.13) and the specification in text that "They should only be defined in the above exceptional circumstances", although SD4 G suggests that "more local Special Policy Areas should be supported and promoted". This needs clarification. We propose that further use of the SPAs could be made in the context of pressures for development in relation to locally significant residential, cultural and heritage assets in the CAZ. The wording of local Social Policy Areas should be applied to Policy SD4K, and such areas should be clearly exempt from Policy SD4 L.

The categorization of specialist creative clusters as special policy areas (2.4.13) serves as a useful precedent/ principle for clusters of ethnic and migrant traders at Latin Elephant and Seven Sisters, for example. Indeed such protective approach to marginalized, grass roots or ethnic community

clusters should be embedded into OA and regeneration policies and practices. We propose that this policy be made more widely applicable, for example to town centres and high streets, outside the CAZ. We specifically recommend this for inclusion in Policy SD7 and Policy SD10 where valued clusters of community uses and assets might otherwise be threatened in town centres and areas of regeneration.

In certain OAs within CAZ, residential is more to the fore, as in Vauxhall Nine Elms Battersea, Elephant & Castle. The protection and enhancement of residential enclaves and development is deserving of strengthening as at 2.4.17 & 2.4.18. We vehemently oppose the extension of CAZ functions at the expense of existing residential neighbourhoods, especially where this entails valuable social housing being lost, as in Elephant and Castle. The proper opportunity costs of losing existing housing provision in well-located and central parts of the city need to be assessed.

SD5 Offices, other Strategic Functions and Residential Development in the CAZ

We note Policy SD5A, prioritizing strategic functions of the CAZ over residential development; as well as 2.5.5 giving equal weight to office and residential developments in Vauxhall Nine Elms Battersea and Elephant and Castle. We note with concern the relation of these to Policy SD4 L requiring a different configuration of social infrastructure in the CAZ. We note the lower CIL and S106 yield from office development. We raise concerns about the implications of this for ensuring that existing communities in these areas benefit from the development, that they are spatially integrated, and that new residents are fully supported through appropriate social infrastructure. We can bring forward extensive evidence to show this is not being delivered in key opportunity areas in the CAZ.

We suggest an addition to Policy SD5A:

Developments in the CAZ should seek to benefit existing residential communities and where new residential developments are brought forward they should be fully provided for in terms of social infrastructure and the wider planning obligations outlined in this London Plan.

SD6 Town Centres

SD7 Town Centre Network

SD8 Town centres: development principles and Development Plan Documents

SD9 Town Centres: Local Partnerships and Implementation

In the current economic climate, high streets are facing threats. Retail habits are changing but other factors also present challenges too. However, 47% of businesses outside Central London are on a high street and 1.45 million employees work on or within 200 metres of a high street, and this number is growing. **Nearly 70 per cent of London's high streets** don't fall within a town centre boundary. This means that the majority of high streets have no

formal policy designation and **are potentially vulnerable to the pressure to deliver housing through redevelopment**¹.

This needs to recognise the shrinking capacity of work space in town centres and high streets (beyond the retail frontage). The purpose of the policy should be to **protect and sustain capacity** – similar to the industrial land policies. Boroughs should ensure that they include all uses (beyond what is prescribed in NPPF). ‘Surplus’ work space should not be automatically released for residential development – it is the low cost capacity that allows for growth, adaptation, innovation. Where high streets are sections of continuous A-road or centripetal arterials, the A-road continuum should be recognised as a key setting for highly varied commerce. The arterial spaces allow local businesses to identify with more than one primary shopping frontage and to move premises to lower-cost positions along the same arterial. The variation in the cost of premises along arterial routes is an extraordinary strength in the traditional urban system.

The main evidence document, the **2017 Town Centre Health Check Analysis** report is based on very high level statistics and projections. It is based on particular assumptions (e.g. a few high level centres will prosper, most small centres will not), which don’t reflect a sound and fine grained understanding of what happens on the ground, in terms of the dynamics of local businesses and organisations, how people live, shop, access education, health, other social infrastructure etc. Research from Suzanne Hall on super diverse high streets for example shows that Rye Lane in Peckham has more retail outlets, jobs and is more profitable than Westfield Stratford². This also brings in strong evidence of the benefits of subdivision of units for a range of very diverse activities. Laura Vaughan’s research on Adaptable Suburbs points out the essential role of small centres and high streets in Outer London in providing sustainable growth.³

Another concern is that home-based work is not considered in either of the Town Centre, or Housing or Design policies. Research from Frances Hollis shows that 25% of the UK workforce is engaged in home based work at least one day a week. ‘The development of workhomes designed to accommodate the dual functions of dwelling and workplace has the potential to bring substantial social and economic benefit to home-based workers, to employers and to society at large.’⁴

¹ **High Streets for All**, 2017, GLA,
https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf

² <https://www.architectsjournal.co.uk/news/tread-softly-for-you-tread-on-my-dreams/8687894.article>

³ <https://justspacelondon.files.wordpress.com/2014/04/falp-laura-vaughan-submission.pdf> and http://www.sstc.ucl.ac.uk/sstc_index.html

⁴ <http://www.theworkhome.com/knowledge-transfer-fellowship/>

Town Centres are the main focus for local identity and key to building sustainable, healthy, walkable communities (the Healthy Streets Approach) and providing for 'growth and diversification for prosperity'. We note that: Borough Plans are to identify town centres suitable for higher density housing; low density buildings should be redeveloped (see **SD8**); each Borough is to have a Town Centre Strategy produced in partnership in a way representative of the local community (**SD9**). We also note **Figure A1.5** which depicts the overlap between town centres and regeneration areas (the 20% most deprived parts of London) and **Figure A1.3** and Annex 1 which depicts Town Centre Residential Growth Potential.

The provision of local growth and access to a wide variety of services, goods, and employment opportunities by sustainable modes of transport may be welcomed. But this growth should be carefully examined to reveal the significant quanta of development, particularly new homes, that this intensification is expected to contribute. **The consequences for town centre characters and functions are likely to be very challenging.** Within **SD 6**, sub clauses **A2** (intensification and renewal) and **A4** (sense of place and identity) are to a large degree not reconcilable.

We note that these issues have been raised in the IIA. In relation to Policy SD8, the London Plan IIA requests that "Details on the provision of green space, cultural participation to support vibrant town centres, and affordability should be considered." The GLA response stated these are "addressed more specifically elsewhere in the Plan." In relation to SD9 the IIA requests that "It was recommended that further information be provided on how Town Centre Strategies could support and develop cultural infrastructure, and appropriate access to such opportunities. It was also recommended that further detail be provided in relation to housing development, for example the policy could make reference to affordable, adaptable and accessible provision." The GLA felt that no changes needed to be made, and that "The GLA advised that further information is provided in other policies within the Plan which address cultural uses and housing". Nonetheless, of great concern is that the appraisal notes an "unknown" impact for both these policies in the Equalities Impact Assessment, against the key objective 13, "To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position."

We feel it is unsound that there are concerns raised by the IIA about the safeguarding of key social and community infrastructure in town centres, that no provision is made in relation to this in the relevant policies, and that the impacts of this policy on the foundations of vital and lifetime neighbourhoods in London, especially for poorer communities, are declared to be unknown. It is our view these highly valued and socially important functions of town centres and high streets will be seriously affected by this policy as low value

uses are displaced for high value uses, economic and cultural activities for unaffordable housing.

Generally, the spatial expression that is 'High Streets For All' has been ignored, as in **SD8B**; indeed, save for one diagram on the classification of town centres (**Figure 2.18**), the whole issue of local parades/centres has not been recognized. See Professor Suzi Hall's work revealing that 'High Streets' are more important than Town Centres for services, employment, vitality and vibrancy.

Proposed Changes to policies

SD8 Town centres: development principles and Development Plan Documents (changes noted in red ink)

Policy SD8 – proposed additions

- A. Development Plans and development proposals should take a town centres first approach by:
1. adopting a sequential approach to accommodating town centre uses including **industrial**, retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites ~~on the edges of centres~~ that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
 2. firmly resisting **large scale** out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office **and industrial** locations in outer London (see Policy E1 Offices) **and exceptions for town centre at edges of centres where town centre boundaries could be extended**
 3. providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan
 4. realising the full potential of existing out of centre retail and leisure parks to deliver housing **and economic** intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above **but an increase in industrial floorspace is acceptable.**
- B. In Development Plans, boroughs should:

1. define the detailed boundary of town centres in policy maps including the overall extent of all non-residential uses in the extent of the town centre and adjacent areas, including all high streets, industrial areas, primary shopping areas, primary and secondary frontages and night time economy. Some town centres may be fragmented (e.g. where pockets of secondary frontage or non-residential uses inside blocks are separate from the main town centre boundary). Areas containing only housing should not be included in town centre boundaries.
- Champion high streets as social, civic and cultural infrastructure. High streets are convenient locations for traditional social infrastructures but are also perceived as social infrastructure in their own right. It is essential to understand the spectrum of social functions better so that growth on high streets does not undermine, but rather maximises this
- Champion high streets as public spaces. Development on high streets should recognise the role of high streets as public spaces for congregation and cultural exchange, as accessible and connected places, and as locations for night-time activity.⁵
3. develop policies for the edge and fringes of town centres, ~~revising the extent of shopping frontages where surplus to forecast demand and~~ introducing greater flexibility ~~between non-residential uses~~, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances ~~but firmly resisting residential use at ground floor~~
4. identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1 comment on this: without accurate data on what is there in town centres, the Annex 1 indicators are insufficient, so additional criteria added below that town centres must be properly audited.

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

- i. an audit and assessment, with public consultation, of the contribution of existing retail, office, commercial, industrial and cultural activities to the local community and wider London communities to provide a baseline to prevent displacement of existing valued uses
- ii. assessments of demand for retail, office and other commercial uses

⁵ **High Streets for All** recommendations, 2017, GLA, https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf

- iii. assessments of capacity for additional housing **on higher floors of buildings above non-residential intensification**
 - iv. public transport accessibility and capacity
 - v. planned or potential transport improvements – to indicate future capacity for intensification
 - vi. existing and potential level of density of development and activity
 - vii. relationship with wider regeneration initiatives
 - viii. vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre **although in central London Boroughs this is likely to be negligible**
 - ix. potential to **protect, enhance and** complement local character, **including social and economic character**, existing heritage assets, **existing ethnic and socially specific assets**, and improve the quality of the town centre environment.
 - x. viability of development.
 - xi. **Potential for strengthening existing local civic and economic activities**
5. identify sites suitable for higher density mixed-use residential intensification **with non-residential uses at ground level** capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:
- a. comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks **to include intensification of economic and civic uses as well as provision of housing**
 - b. redevelopment of town centre shopping frontages that are surplus to demand **into adaptable types to accommodate different non-residential uses**
 - c. redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing **and increasing by 50% non-residential uses and floorspace** This seems too simplistic, and needs unpacking. The first step should be to assess why upper floors are not being properly used and see if steps can be taken to get them well-used.
 - d. delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses **at ground floor** as part of a mixed-use development.
 - e. support flexibility for temporary or ‘meanwhile’ uses of vacant properties **which exclude temporary use as residential.**
6. **conduct a complete audit of all non-residential accommodation; internal and external floorspace; and jobs in the borough prior to preparation of local plans, and prior to defining town centre boundaries**

- C. Development proposals should:
0. ensure that commercial, **industrial and office** floorspace relates to the size and the role and function of a town centre and its catchment **and ensure accommodation and local policy are sufficiently adaptable to absorb a range of non-residential uses**
 1. ensure that commercial, **industrial, office and all non-residential** space is appropriately located having regard to Part A above, fit for purpose, with ~~at least basic~~ fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties. **If non-residential properties lie vacant fit out should be improved and rent reduced**
 2. ~~support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents~~
 3. support the **social, civic and economic** diversity of town centres by providing a range of ~~commercial~~ unit sizes, **located appropriately within the block at ground floor level**, particularly on larger-scale developments **and on developments on arterial roads which have potential as high streets.**

Policy SD9

Policy SD9 A which calls for each town centre to have a Strategy produced in partnership, inclusive and representative, at the local level is supported, but to reflect its potential, this should be in the over-arching/ framing Town Policy SD6 and this approach should be embedded in all spatial policies for plan-making, including in SD1 for Opportunity Areas, and H2 Small Sites for incremental intensification. We recommend inclusion of a strong overall statement in GG1 and a commitment to develop a Mayoral SCI establishing both the Mayor's own practice and giving guidelines for good practice across all actors.

Policy SD 9 C 1) Article 4 Directions to protect the economic and social activities of town centres from permitted development rights for housing redevelopment are welcomed.

However, this protection is not supported by Policy SD8 B 4 and Annex 1, as well as H2 Small Sites, which advocates incremental intensification up to 800m from Town Centres. We have grave concerns about the implications of the wider Town Centres policy for the potential loss of community venues, affordable and free access to communal, sport and heritage-related activities, and other valued assets such as locally based or ethnically valued businesses and employment. This is especially important in view of the overlap between regeneration areas and town centres, as shown in Figure A 1.5 where the loss

of social infrastructure and community assets in the context of London's poorest communities would have a devastating effect.

Please note our recommendations for effective participation in planning in these areas in relation to text 2.1.2 in relation to overlap and conflicts between different spatial elements of this Plan.

Additional Policy element in SD9

We suggest inserting here an additional text on designation of local Social Policy Areas, from SD 4G and text 2.4.13 to provide an opportunity for local communities and boroughs to afford protection to valued community activities, facilities and cultural and heritage assets.

Annex 1: There is a detailed listing of Town Centres in Annex 1, with maps, indicating their classification, levels of commercial, residential and office development potential. The table also lists if the town centre is part of or includes a strategic area for regeneration. The basis for declaring town centres available for incremental, medium or high residential and commercial growth potential is not evident. Does this designation conform with the expectations of Policy SD9 A? Has the planning for intensification of town centre uses and the identification of potential been undertaken in partnership with existing communities and businesses? Has there been an effective consultation process on the future development of these town centres? Have existing employment and other uses of the sites envisaged for development been assessed? How will existing valued community and heritage assets and uses be protected?

We propose inserting clarification on this in Annex 1:

Additional Note to Title, Town Centre Network: The designations of potential for development in this table are provisional, subject to consultation and assessment in each town centre.

SD10 Strategic and Local Regeneration

We object that the collaboration with communities is in text only (2.10.3) and not explicit in policy. Additional text points (2.10.6) could be usefully incorporated into policy together with new points that demolition is not implicit in regeneration and that social infrastructure, local employment and affordable premises including industrial units are also key to successful regeneration. In further analysis of this policy, It is important to cross-relate with the Good Practice document on Estate Regeneration and Housing Policy H10 as regeneration areas are likely to include council estates.

Thus in the discussion of Policy SD10 (p. 92-3), it is suggested (2.10.3) that "In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in **collaboration with local communities**, involving a broad spectrum of groups and individuals, to develop a shared vision for the area.... There should be a shared

understanding of how the regeneration area needs to change, and how that change will be secured, managed and embedded within and supported by the community. (p. 93-4)".

TEXT CHANGE PROPOSAL: The entire text of 2.10.3 needs to be placed within the policy box of SD10, to ensure this is able to be secured at implementation. The policy currently sees no role for communities in bringing forward major changes to their homes and neighbourhoods through neighbourhood plans or community plans. Commitments to public participation in planning, notably in regeneration and large scale developments, need to be considerably strengthened.