

Town Centres and Retailing Wednesday 15 May all day?

Town Centre Network

M88. Is the town centre network set out in the Plan justified and would it be effective in ensuring that identified needs for main town centre use developments are met in appropriate locations in accordance with national policy?

We are delighted to welcome the minor amendment which adds “high streets” to the title of town centres. However this looks like lip service because the policies have not been thought through.

The town centres hierarchy and network represent a thoroughly out-of-date approach to planning which threatens the environmental, social and economic sustainability of London. Briefly

- (i) Failure to acknowledge the scale and importance of centres, high streets and parades as the locations for so many of London’s jobs, businesses and public services risks sacrificing valuable work opportunities close to homes for so many suburban residents — especially damaging to women, low-income people and thus presumptively many deprived ethnic minorities— as these locations are targeted for ‘consolidation’ and residential intensification.
- (ii) The plan is based on unrelated analyses of two or three real-estate property types —retail, offices and industrial— so it has lost sight of the overlap & interplay between these categories. The growing body of research which integrates suburban activity and gives real clues to what makes a place ‘vibrant’ has not yet penetrated policy-making, even though some of it has been commissioned by the GLA.¹
- (iii) The hierarchy assumes size is everything while in fact London’s centres have developed many distinct specialisations alongside the generic chain stores or corporate retailing – serving distinct ethnic product types and customers or different price bands and income groups. These differences are not yet sufficiently nurtured in the Plan. Even quite small centres can now serve a local catchment PLUS specialist London-wide or sub-regional users PLUS, in some cases, national and international customers via multi-channel means.

The next London Plan should do all this better. In the mean time our comments on Matters 88-90 are designed to minimise damage in the short run.

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 dense redevelopment¹.

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 rent enterprises are displaced by higher-rent users.

In particular:

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

No. It is out-of-date, fails to capture the diversity of centres and to minimise the need to travel.

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

What on earth are these national policies and legislation? Help me.

c) Are the future potential changes to the town centre network illustrated on Figure A1.1 and set out in Table A1.1 justified?

Hard to imagine Stratford City becoming an “international;” centre. But does it matter?

Isn't Brent Cross now in some doubt, also Westfield Croydon? Why is this part of the Plan even needed?

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

Annex 1: There is a detailed listing of Town Centres in Annex 1, with maps, indicating their classification, levels of commercial, residential and office

¹ *High Streets for All*, 2017, GLA,

https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf

Comment [1]: Something here on the poor modelling assumptions that see small town centre and high street decline – so it is not justified as no evidence for the definitions and planned developments

Comment [2]: The nppf covers the latter – the town centre national policy I am afraid I have no idea.

Comment [3]: These are important because the loss of local town centres is really a problem. Also there is a lack of consultation on the planned developments of these elements of the spatial development framework, whereas TC's overlap with regeneration areas and OAs which have more clear consultation processes.

development potential. The table also says whether 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.

Has to be finalised by Thursday 28 Feb m.edwards@ucl.ac.uk

902 words

Comment [4]: Again as there is no designated consultation process on the incremental loss of retail and social infrastructure capacity, there is a major spatial change by stealth.