

The planning applications for the two sites are considered at the same time by the planning authority and are linked by a Section 106 agreement or planning condition. A land use credit is where new off-site office provision is provided in advance by a developer on the basis that it could be drawn down to satisfy the requirements of Part H by a specified residential or mixed residential and commercial development.

- 2.5.8 **Affordable housing** provision should be provided on-site as part of residential and mixed-use schemes in the CAZ (see [Policy H4 Delivering affordable housing](#)). In exceptional circumstances, off-site and cash in lieu contributions can be provided in line with [Policy H4 Delivering affordable housing](#) where this serves to sustain important clusters of commercial activities in the CAZ and Northern Isle of Dogs.

Policy SD6 Town centres and high streets

- A The vitality and viability of London's varied town centres should be promoted and enhanced by:
- 1) encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses
 - 2) identifying locations for mixed-use or housing-led intensification to optimise residential growth potential, securing a high-quality environment and complementing local character and heritage assets
 - 3) delivering sustainable access to a competitive range of services and activities by walking, cycling and public transport
 - 4) strengthening the role of town centres as a main focus for Londoners' sense of place and local identity in the capital
 - 5) ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy
 - 6) supporting the role of town centres in building sustainable, healthy and walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

- B The adaptation and diversification of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.
- C The potential for new housing within and on the edges of town centres should be realised through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.
- D The particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including smaller households, Build to Rent, older people's housing and student accommodation.
- E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see [Policy E1 Offices](#)) and the need for affordable and suitable business space ([Policy E2 Providing suitable business space](#), [Policy E3 Affordable workspace](#)).
- F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see [Figure 7.6](#) and [Table A1.1](#)) and supporting the development of cultural uses and activity.
- G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted (see [Policy E10 Visitor infrastructure](#)).
- H The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.
- I The varied role of London's high streets should be supported and enhanced.
- J The provision of social infrastructure should be enhanced, particularly where it is necessary to support identified need from town centre and local residents, and facilities should be located in places that maximise footfall to surrounding town centre uses.

- K Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.

- 2.6.1 London's **town centres are central to the lives of Londoners**. They provide a focus for the local community, both geographically and in relation to the sense of identity and broad mix of uses they provide. Policy SD6 Town centres and high streets does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ).²⁰ The CAZ contains a rich mix of functions, including a substantial quantity and variety of main town centre uses, and will continue to play a crucial role in supporting London's growth. Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ guide development of the CAZ and set out how the development of main town centre uses in the CAZ should be brought forward.
- 2.6.2 The spaces within and around town centres have an important public function, with high streets, public squares, markets, parks, gardens and other open spaces providing opportunities for people to gather, meet, socialise, and be entertained. Town centres are usually transport hubs, served by rail, tram and bus networks, and are accessible for people walking and cycling. Town centres and high streets have social value, providing access to a range of shops and services, employment opportunities, social contact, and information and support. The agglomeration of town centres gives rise to formal and informal networks of businesses, supply chains, customers, employees, institutions, and volunteers that can provide mutual support, advice and economic benefit. Many town centres in London are of historic interest and contain high concentrations of heritage assets.
- 2.6.3 **High streets** are one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. The character and function of high streets within town centres should be promoted and enhanced.
- 2.6.4 Over the years, town centres have absorbed change and new technologies. To continue to thrive they will need to evolve and diversify in response to current

²⁰ Policy SD6 Town centres and high streets applies to the entirety of Angel town centre and Elephant and Castle town centre.



and future economic trends, technological advances, consumer behaviours, and the development of the 24-hour city. This **need for adaptation and diversification**, together with their good public transport accessibility, makes many town centres appropriate locations for residential-led intensification or mixed-use development that makes best use of land. Bringing new residents into town centres can enhance their commercial role, increasing footfall, particularly to support convenience retail, leisure uses and the evening and night-time economy. Town centres will also need to diversify the range of commercial uses, particularly smaller centres and those with projected decline in demand for retail floorspace. Boroughs and others should ensure their strategies, policies and decisions encourage a broad mix of uses while protecting core retail uses to meet demand.

- 2.6.5 Retailing has evolved to become multi-channel, with a mix of physical stores, 'click and collect' points, direct delivery to homes and workplaces, and showrooms for digital businesses. Overall, household expenditure on retail is projected to rise but this demand will be spread unevenly across London's town centres, reflecting **trends towards the polarisation of retail space** towards the larger and stronger centres in London.²¹ Approximately 76 per cent of the gross comparison goods retail floorspace requirement is anticipated to be focused in the International, Metropolitan and Major town centres and CAZ retail clusters, with 11 per cent in District centres.²² As many as 60 per cent of District centres in London are likely to have surplus comparison goods retail space over the Plan period.
- 2.6.6 These trends present significant **challenges and opportunities for retailing** in all town centres and associated high streets including adapting to new innovative forms of retailing, accommodating new space where there is identified demand, and managing the transition of surplus retail floorspace to other uses, such as leisure, business, and more intensive forms of mixed-use development that include a residential component, in appropriate locations. Boroughs and other stakeholders will need to proactively manage their town centres to take account of these trends and the impacts on centres of different types and sizes.
- 2.6.7 **Residential development** plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing. Residential-only schemes in town centres may be appropriate outside the primary shopping area

²¹ Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian, 2017

²² Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian, 2017



and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

Policy SD7 Town centres: development principles and Development Plan Documents

- A When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see [Policy E1 Offices](#)). Boroughs should:
- 1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused
 - 2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused
 - 3) realise the full potential of existing out-of-centre retail and leisure parks to deliver housing 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 unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact assessment requirements in Parts A(1) and A(2) above.

- B Boroughs should support the town centres first approach in their Development Plans by:
- 1) assessing the need for main town centre uses, taking into account capacity and forecast future need
 - 2) allocating sites to accommodate identified need within town centres, considering site suitability, availability and viability, with limited exceptions for existing viable office locations in outer London (see [Policy E1 Offices](#)). If suitable and viable town centre sites are not available, boroughs should allocate appropriate edge-of-centre sites that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
 - 3) reviewing town centre boundaries where necessary
 - 4) setting out policies, boundaries and site allocations for future potential town centres to accommodate identified deficiencies in capacity (having regard to [Policy SD8 Town centre network](#) and the future potential town centre classifications in [Annex 1](#)).
- C In Development Plans, boroughs should:
- 1) define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing
 - 2) consider the protection of out-of-centre high streets as local parades or business areas and develop appropriate policies to support and enhance the role of these high streets, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see [Policy H1 Increasing housing supply](#))
 - 3) develop policies through strategic and local partnership approaches ([Policy SD9 Town centres: Local partnerships and implementation](#)) to meet the objectives for town centres set out in [Policy SD6 Town centres and high streets](#) to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network ([Policy SD8 Town centre network](#))

- 4) develop policies for edge-of-centre areas, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses taking into account local circumstances
- 5) 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](#). Criteria to consider in assessing the potential for intensification in town centres include:
 - a) assessments of demand for retail, office and other commercial uses
 - b) assessments of capacity for additional housing
 - c) public transport accessibility and capacity
 - d) planned or potential transport improvements – to indicate future capacity for intensification
 - e) capacity and proximity of social infrastructure
 - f) existing and potential level of density of development and activity
 - g) relationship with wider regeneration initiatives
 - h) vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre
 - i) potential to complement local character, existing heritage assets and improve the quality of the town centre environment
 - j) viability of development.
- 6) identify sites suitable for higher density mixed-use residential intensification 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
 - b) redevelopment of town centre shopping frontages that are surplus to demand
 - 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 non-residential uses

d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.

7) support flexibility for temporary or 'meanwhile' uses of vacant properties.

D Development proposals should:

- 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment
- 2) ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing
- 3) 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
- 4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.

2.7.1 The London Plan takes a strong **town centres first** approach, in order to make the most of the agglomeration benefits and accessibility of town centres and to ensure sustainable patterns of development. Out-of-centre development can be particularly detrimental to town centres, undermining their economic performance, local character, and the accessibility they provide to a broad range of services, and encouraging increased trips by car. In order to support the vitality of town centres, it is important to take a sequential approach, focusing on sites within town centres before considering edge-of-centre sites. This ensures that town centre uses are not unnecessarily dispersed, maximises the overall growth potential of town centres and promotes investment in high streets and primary shopping frontages.

2.7.2 Borough's local Development Plan Documents should proactively plan to meet forecast need for main town centre uses by allocating sites within or (where justified) on the edge of town centres and through town centre boundary reviews, in order to support the town centres first approach. Where town centre and edge of centre sites are not available, local Development Plan Documents should identify future potential town centres that could accommodate the forecast additional need, and set appropriate policies, boundaries and site



allocations for these areas (having regard to Policy SD8 Town centre network and the future potential town centre classifications in Annex 1). This approach will deliver a sustainable pattern of development by **focusing main town centre uses to existing town centres or through the creation of new centres.**

- 2.7.3 Policy SD7 Town centres: development principles and Development Plan Documents does not apply to **CAZ** Retail Clusters or any town centres located wholly within the Central Activities Zone.^{23, 24}
- 2.7.4 Where **edge-of-centre developments of retail, leisure and office uses** are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment. This applies to development greater than a locally set floorspace threshold, or 2,500 sqm if a local floorspace threshold has not been set. An impact assessment may also be required for developments below this threshold, for example where a borough has set a proportionate, local floorspace threshold. Impact assessment may also be required where a proposal is likely to give rise to development at a scale not related to the role and function of a centre, such as a large retail store in or on the edge of a neighbourhood or local centre. Assessments should consider the impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal, and the impact on town centre vitality and viability.
- 2.7.5 Existing out-of-centre and edge-of-centre retail and leisure parks are often low density and car dependent, and poorly integrated into the surrounding area. They usually suffer from an environment that creates barriers to cycling and walking, with extensive surface car parks and buildings that have large footprints and limited active frontages. Many of these places have significant potential to provide additional housing, improve the impact on the local environment, improve legibility, and become more sustainable in the modes of transport they enable and encourage. **Redevelopment of retail and leisure parks to deliver housing intensification** is encouraged, as set out in Policy H1 Increasing housing supply. This should not generally result in an increase of retail or leisure floorspace, taking account of the town centres first approach, the sequential approach to town centre uses, and impact assessments where appropriate. Some edge-of-centre retail parks may be appropriate for a wider range of employment uses, subject to sequential testing and impact assessment.

²³ Policy SD7 Town centres: development principles and Development Plan Documents applies to the entirety of Angel town centre and Elephant and Castle town centre.

²⁴ See paragraph 2.6.1 for further information.



- 2.7.6 It is important that boroughs **plan positively to meet the needs of their communities**. Being able to access convenience retail, specialist shops and services is important for supporting the daily lives of Londoners and for creating and sustaining strong and inclusive communities. Many town centres and high streets serve specific communities, for example they may provide specialist food or clothing that meet the cultural or religious needs of one or more particular group. Boroughs should use their evaluation of the area and engagement with local communities and stakeholders to draw up local Development Plan policies, designations and site allocations, and develop town centre strategies that seek to meet the needs of their communities.
- 2.7.7 The **location, design, type, and level of fit-out** of commercial uses, particularly those in mixed-use development, should support the town centres first approach and ensure that commercial premises make a positive contribution to the vitality of the area and are quickly occupied. Where commercial uses are appropriate, it is important that the units are prominently and accessibly situated and clustered together. They should have flexible layouts with few columns or risers, be of a suitable depth to be able to accommodate back-of-house functions, and have adequate floor-to-ceiling heights. Units should be weather-tight and partially fitted-out, such as with toilets, kitchenettes, heating and services, to make them commercially attractive to potential occupiers, before residential units are occupied. A range of unit sizes should be provided, to ensure that town centres can provide floorspace for both large and small occupiers, and to support the diversity, vitality and vibrancy of town centres.

Policy SD8 Town centre network

- A The changing roles of town centres should be proactively managed in relation to the town centre network as a whole (see [Figure 2.17](#) and [Annex 1](#)). This process should support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres and complement those in the Wider South East.
- B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see [Annex 1](#)) or reassessing town centre boundaries (see [Policy SD7 Town centres: development principles and Development Plan Documents](#)). Diversification in centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported.

