LB Tower Hamlets

Town Centre Policy Development
Unless alternative contractual arrangements have been made, this report remains the property of Roger Tym & Partners until fees have been paid in full.

Copyright and other intellectual property laws protect this information. Reproduction or retransmission of the information, in whole or in part, in any manner, without the prior written consent of the copyright holder, is a violation of copyright law.

<table>
<thead>
<tr>
<th>Author/Amended by:</th>
<th>Authorised by</th>
<th>Date:</th>
<th>Version:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA</td>
<td>JP</td>
<td>12/01/11</td>
<td>Draft Report</td>
</tr>
</tbody>
</table>

The above table is to be completed in draft reports only to show the progress for ISO purposes

P2062
## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXECUTIVE SUMMARY</td>
<td>i</td>
</tr>
<tr>
<td>1 INTRODUCTION</td>
<td>1</td>
</tr>
<tr>
<td>2 TOWN CENTRE BOUNDARIES AND PRIMARY/SECONDARY SHOPPING AREAS</td>
<td>2</td>
</tr>
<tr>
<td>Introduction</td>
<td>2</td>
</tr>
<tr>
<td>Policy context</td>
<td>2</td>
</tr>
<tr>
<td>Case Study Boroughs</td>
<td>7</td>
</tr>
<tr>
<td>Suggested Methodology for Tower Hamlets</td>
<td>8</td>
</tr>
<tr>
<td>3 TOWN CENTRE BALANCE OF USES</td>
<td>12</td>
</tr>
<tr>
<td>Introduction</td>
<td>12</td>
</tr>
<tr>
<td>Policy context</td>
<td>12</td>
</tr>
<tr>
<td>Case Study Boroughs</td>
<td>13</td>
</tr>
<tr>
<td>Suggested Approach for Tower Hamlets</td>
<td>15</td>
</tr>
<tr>
<td>4 PROPORTION OF RETAIL TO BE DIRECTED TO EACH CENTRE</td>
<td>17</td>
</tr>
<tr>
<td>Core Strategy Figures and Recommendations</td>
<td>17</td>
</tr>
<tr>
<td>Suggested Methodology for Tower Hamlets</td>
<td>17</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY

Introduction

1 In 2009, Roger Tym & Partners undertook the Retail and Leisure Capacity Study for Tower Hamlets, to inform the Council’s emerging Local Development Framework (LDF) documents. We have now been asked to prepare this additional piece of evidence setting out suggested methodologies for developing detailed town centre policies.

Town Centre Boundaries and Primary Secondary Shopping Areas

2 In accordance with the London Plan, we recommend that the Council identify Town Centre Boundaries (for the Major, District and Neighbourhood Centres), and Primary and Secondary Shopping Areas (for the Major and District Centres).

3 For each centre, the Council should start with diversity of use mapping on GIS. When defining Town Centre Boundaries, the Council should consider: the main concentration of town centre uses, whether the town centre is a compact, sustainable area, development sites, the role and function of the town centres and any planned regeneration.

4 When defining Primary and Secondary Shopping Areas, the Council should consider the location of the main concentration of A1 Retail uses, the location of any key anchor stores and any pedestrian survey work which has been undertaken.

Town Centre Balance of Uses

5 In order to keep centres as the main focus for retail development but allow for other appropriate uses, it is useful for the LDF to include policies to manage applications for change of use in the Primary and Secondary Shopping Areas. In our view these policies should state that proposals will not be permitted if they result in the percentage of A1 units falling below a certain level, and that non-A1 uses should not occupy more than a set number of consecutive units.

6 The Council should start with diversity of use mapping on GIS to establish the existing balance of uses, and should then consider whether the aim is to maintain this, increase it or allow it to fall, depending on the current and future role of each centre.

Proportion of Retail to be Directed to Each Centre

7 The Core Strategy includes Borough-wide requirements for new comparison and convenience retail floorspace up to 2017, as well as recommendations as to where this floorspace should be directed. In order to break the figures down by centre, the Council will first need to identify the main development sites and then establish the capacity of these sites by examining any planning applications / permissions and masterplans, and discussing the sites with case officers and developers.

8 It will be important that the Council also consider their aspirations for each of the centres where capacity is identified. Development should be appropriate to the scale of each centre.
1 INTRODUCTION

1.1 In 2009, Roger Tym & Partners undertook the Retail and Leisure Capacity Study for Tower Hamlets, to inform the Council’s emerging Local Development Framework (LDF) documents.

1.2 The Council adopted their Core Strategy in September 2010. This takes forward the broad recommendations from the Retail Study, including new floorspace requirements and which town centres these should be directed to. It also sets out the town centre hierarchy.

1.3 The Council is now working on two Development Planning Documents (DPDs); Site and Placemaking and Development Management. These will contain the detailed policies on the management of the town centres. To help the Council develop these policies, we have been asked to prepare an additional piece of evidence looking at three elements, considered in the remaining three sections of this report:
   - Town Centre Boundaries and Primary/Secondary Shopping Areas
   - Maintaining a balance of uses in town centres
   - Allocation of new retail floorspace by centre

1.4 To make recommendations for Tower Hamlets, we consider:
   - The detailed research undertaken as part of the Retail Study – in particular the healthchecks.
   - The latest Government guidance as set out in Planning Policy Statement 4: Planning for Sustainable Economic Development (PPS4, 2009) and accompanying Practice Guide, as well as the Draft Replacement London Plan, which has now been through Examination in Public.
   - How other London Boroughs have developed or are developing such policies in their LDFs; we look at Wandsworth, Lewisham and Hackney.
   - Our own experience of advising local authorities in London and elsewhere.
2 TOWN CENTRE BOUNDARIES AND PRIMARY/SECONDARY SHOPPING AREAS

Introduction

2.1 In this section, we provide background and guidance to help the Council to update the Town Centre Boundaries and define Primary and Secondary Shopping Areas. First, we set out national, London-wide and local policy. Second, we consider three case study examples – Wandsworth, Lewisham and Hackney – to see how these Boroughs have defined boundaries and frontages in their adopted or emerging Local Development Framework documents.

2.2 Finally, we set out a recommended approach for Tower Hamlets.

Policy context

PPS4 and Practice Guide

2.3 The Government’s latest guidance on town centres is set out in Planning Policy Statement 4: Planning for Sustainable Economic Development (PPS4), published in 2009. Annex B sets out the following designations:

- **TOWN CENTRE** - defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. The extent of the town centre should be defined on the proposals map.

- **PRIMARY SHOPPING AREA** - defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage). The extent of the primary shopping area should be defined on the proposals map. Smaller centres may not have areas of predominantly leisure, business and other main town centre uses adjacent to the primary shopping area, therefore the town centre may not extend beyond the primary shopping area.

- **PRIMARY FRONTAGE** - primary frontages are likely to include a high proportion of retail uses.

- **SECONDARY FRONTAGE** - secondary frontages provide greater opportunities for a diversity of uses.


2.5 It acknowledges the role of town centre health checks, stating at para. 4.26, that these can inform decisions about the extent of the primary shopping area and primary/secondary frontages, for example by "recognising where the role and function of different parts of the centre have changed over time."

2.6 At para. 6.4 sets out the factors to consider when defining the primary shopping area - prime rental levels, pedestrian flows, and the presence of key anchor stores and other main town centre uses. Para. 6.10 states that “When preparing their LDFs, local planning
authorities should identify what they regard as the Primary Shopping Area (PSA). This is important to provide clarity to applicants about the policy status of different sites.”

2.7 Para. 6.10 states that LPAs should “seek to make the best possible use of scarce town and city centre sites, promoting mixed use development wherever appropriate. As part of this, authorities should acknowledge the particular locational requirements of retailing, including the key role of retail ‘anchors’ in generating pedestrian flows and reinforcing a compact, well defined retail area. Integration will be an important aspect of retail proposals, especially where they involve extensions to the primary shopping area.”

2.8 Para. 6.13 states that “LPAs should also identify an appropriate ‘town centre boundary’ within which it will seek to locate other main town centres uses. It may be appropriate to define other areas within the town centre but outside the PSA where specific uses are encouraged e.g. specialist retail, offices, bars/restaurants etc. To ensure that such uses are able to benefit from the centre’s accessibility by alternative means of transport (and facilitate linked trips), it is important to ensure the town centre boundary is not drawn too widely.” Para. 6.14 states that they should “consider existing and potential linkages and public transport accessibility levels (PTAL) as a guide to determining the appropriate extent of the town centre boundary, including what may constitute ‘edge of centre’ locations for other non-retail town centre uses.”

2.9 The map [over] shows our interpretation of the PPS4 designations – this example is from the Teignbridge Retail and Leisure Study (January 2010), which we undertook for Teignbridge District Council to inform their Local Development Framework. The Town Centre Boundary encompasses the wider area of main town centre uses. The Primary Shopping Area is a more compact area, comprising the main area of A1 Retail use and including potential development sites identified through the study.

2.10 The Primary Shopping Frontages are the actual building frontages along the main shopping streets, where A1 Retail uses are concentrated, whereas the Secondary Shopping Frontages are also building frontages but comprise more diverse uses (such as A2 Services and A3-A5 Restaurants, Cafes and Bars) in the fringe areas of the centre.
Policy 2.15C states that, in light of local and strategic capacity requirements, Boroughs should: “identify town centre boundaries, primary and secondary shopping areas in LDF proposals maps and set out policies for each type of area…to conform with capacity and health checks.”

This is a slightly different approach to that outlined in PPS4 – the London Plan does not mention Primary or Secondary Frontages rather, it recommends that Boroughs identify Primary and Secondary Shopping Areas and neither does the Practice Guide. Tower Hamlets may wish to clarify, with the GLA, the correct approach.

The London Plan makes recommendations about some of the Tower Hamlets town centres. It identifies the Isle of Dogs as an Opportunity Area and states that:

“Retail provision in Canary Wharf has the potential to develop and serve a wider catchment, complemented by a broader range of civic, leisure and other town centre facilities. At Crossharbour there is potential for less car dependent, more sustainable development providing a wider range of uses.”
2.14 At Annex 2, the DRLP deals with centre classifications: Table A2.1 states that Roman Road West should remain a District Centre but that this should be subject to monitoring. Table A2.2 includes Bromley-By-Bow and Crossharbour as possible reclassifications (to District Centres – although Crossharbour is already a District Centre in the Tower Hamlets UDP 1998).

**Tower Hamlets Policy & Evidence**

2.15 The Tower Hamlets Core Strategy 2010 defines the following town centre hierarchy:

- City Fringe Activity Area and Canary Wharf Activity Area
- Canary Wharf Major Centre
- Nine District Centres – including a new designation at Bromley-By-Bow and a reclassification of Brick Lane, previously a Neighbourhood Centre
- 17 Neighbourhood Centres, excluding some previously designated centres and including some new ones, reflecting changes which have taken place since the previous plan (1998 Unitary Development Plan).

2.16 There is currently no Proposals Map as part of the Core Strategy but this will be prepared as part of the Site & Placemaking and Development Management DPDs. The previous proposals map, from the UDP 1998, shows the following boundaries:

- Central Area Zones (covers Canary Wharf and the Central Activities Zone on western boundary of the Borough)
- District Centre Core Area
- District Centre Fringe Area
- Local Shopping Parade

2.17 The Council also prepared a draft new proposals map in 2007, as part of the Interim Planning Guidance which was withdrawn when the Council began work on the Core Strategy. The Council considered town centre boundaries and frontages when preparing this map, and the following are shown:

- Central Area Zone
- Central Activities Zone
- Major Centre Boundary
- Major Centre Primary Frontage
- Major Centre Secondary Frontage (with proposed amendments)
- District Centre Primary Frontage
- District Centre Secondary Frontage
- Neighbourhood Centre

2.18 The Tower Hamlets Retail and Leisure Capacity Study (2009), which formed part of the evidence base for the Core Strategy, included some detailed recommendations regarding changes to town centre boundaries (at paras. 14.44 onwards). These are based on the town centre healthchecks undertaken as part of the study, and are shown in Table 2.1 below.
Table 2.1 Retail & Leisure Capacity Study 2009 – Recommendations

<table>
<thead>
<tr>
<th>Activity Areas</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Activities Zone (CAZ)</td>
<td>Scope for extending along Commercial Road and also into Aldgate, as part of the Aldgate Masterplan.</td>
</tr>
<tr>
<td>Tower Hamlets Activity Area</td>
<td>Suggested new designation in two locations, 1) City Fringe - further small scale mixed uses, with anchor stores / large retail units directed to the centres within the area, 2) Canary Wharf – small scale mixed uses in the area bordering the centre. The Core Strategy supports this.</td>
</tr>
<tr>
<td>Major Centre</td>
<td></td>
</tr>
<tr>
<td>Canary Wharf</td>
<td>Enable the centre to expand and strengthen - consider defining a core and fringe area. The Core Strategy supports continued growth.</td>
</tr>
<tr>
<td>District Centres</td>
<td></td>
</tr>
<tr>
<td>Bethnal Green</td>
<td>Consider extending eastwards to take in the development site near the underground and the civic uses on Cambridge Heath Road.</td>
</tr>
<tr>
<td>Chrisp Street</td>
<td>Consider allocating for redevelopment, with a possible boundary extension - consult with Poplar HARCA who have redevelopment plans for the area.</td>
</tr>
<tr>
<td>Crossharbour</td>
<td>Consider allocating for redevelopment and extension.</td>
</tr>
<tr>
<td>Roman Road East</td>
<td>Redefine to exclude the existing “fringe area” to enable redevelopment for other uses and give the centre focus.</td>
</tr>
<tr>
<td>Roman Road West</td>
<td>No change - but note that the poor quality buildings around the square are development opportunities.</td>
</tr>
<tr>
<td>Watney Market</td>
<td>Consider extending the boundary.</td>
</tr>
<tr>
<td>Whitechapel</td>
<td>No change – redevelopment of south side already being promoted by Whitechapel Masterplan</td>
</tr>
<tr>
<td>Brick Lane</td>
<td>Upgrade to district centre (this has been taken forward into the Core Strategy) and extend boundary to include Truman Brewery Site. Possibly designate northern part of centre as an “evening uses” zone.</td>
</tr>
<tr>
<td>Bromley by Bow</td>
<td>Designate as a district centre if considerable mixed use development can be delivered (this has been taken forward into the Core Strategy).</td>
</tr>
<tr>
<td>Neighbourhood Centres</td>
<td></td>
</tr>
<tr>
<td>Wapping</td>
<td>No change.</td>
</tr>
<tr>
<td>Cleveland Way / Cambridge Heath Rd</td>
<td>Amend boundary to exclude small parade of shops on Cleveland Way, to consolidate the centre.</td>
</tr>
<tr>
<td>Whitehorse Lane</td>
<td>Consider extending to include the area around Stepney Green underground station and the nearby Anchor Retail Park.</td>
</tr>
<tr>
<td>Ben Jonson Road</td>
<td>May need to be amended in line with planned redevelopment of the Ocean Estate.</td>
</tr>
<tr>
<td>Aberfeldy Street</td>
<td>Allocate for redevelopment as a new and bigger centre.</td>
</tr>
<tr>
<td>Stroudley Walk</td>
<td>This is part of an area which will be redeveloped by Poplar HARCA.</td>
</tr>
<tr>
<td>Poplar High Street</td>
<td>Consider extending to include the area around Blackwall DLR station.</td>
</tr>
<tr>
<td>Manchester Road</td>
<td>Consider extending to include the area around Island Gardens DLR station.</td>
</tr>
<tr>
<td>Mile End</td>
<td>Possible new centre (this has been taken forward into the Core Strategy).</td>
</tr>
<tr>
<td>Thomas More</td>
<td>Possible new centre (this has been taken forward into the Core Strategy).</td>
</tr>
<tr>
<td>Devons Road</td>
<td>Possible new centre (this has been taken forward into the Core Strategy).</td>
</tr>
<tr>
<td>Limehouse</td>
<td>Possible new centre (this has been taken forward into the Core Strategy).</td>
</tr>
<tr>
<td>Hackney Wick</td>
<td>Possible new centre (this has been taken forward into the Core Strategy).</td>
</tr>
</tbody>
</table>
Case Study Boroughs

**Wandsworth**

2.19 The Core Strategy (2010) sets out a town centre hierarchy and identifies potential for new Central Activities Zone (CAZ) frontages.

2.20 The Proposals Map Core Strategy (Incorporating the UDP) Adopted October 2010 shows:
- Town Centre Boundaries
- Local Centre Boundaries
- Protected Core Shopping Frontages
- Protected Secondary Shopping Frontages
- Important Local Parades

2.21 The Development Management Policies Document and Site Specific Allocations Document - Proposed Submission (2010) - states that a review of the town and local centre boundaries and protected shopping parades has been carried out. It does not say, however, how this has been done. The proposed new boundaries and frontages are shown on the accompanying new Proposals Map. By identifying frontages rather than areas, Wandsworth are following the PPS4 rather than London Plan approach.

**Lewisham**

2.22 The Core Strategy Submission Version (2010) sets out the town centre hierarchy and, for Major and District Centres, follows the London Plan approach by listing Primary and Secondary Shopping Areas.

2.23 The Proposed Changes to the UDP Proposals Map (2010) includes some amendments to the Primary and Secondary Shopping Areas identified on the 2004 UDP proposals map (then called shopping core and non-core areas).

2.24 It also proposes some boundary adjustments:
- The boundary of the District Centre at Forest Hill has been modified to remove an established residential section from the designation as it does not contribute to the role and function of the town centre.
- The District Centre at New Cross has combined with the Local Centre at New Cross Gate to create a new District Centre called New Cross/New Cross Gate. Additionally, two other sections have been added to the centre to clarify the town centre boundary.

2.25 The methodology used to make these amendments is not stated.

**Hackney**

2.26 The Hackney Core Strategy: Proposals Map (Adopted November 2010) designates a Major Town Centre, District Town Centres, Local Shopping Centres and Street Markets. It does not identify areas or frontages. However, the Hackney Central Area Action Plan (AAP - Phase 1) Masterplan November 2009, follows the London Plan approach by identifying Primary and Secondary Shopping Areas for Hackney Central at Figure 6.3.
2.27 The document states that the Primary Shopping Area centres around the “shopping circuit” where there is a mix of retail and business uses and local and national retailers, whereas the Secondary Shopping Area provides complementary uses as well as retail of a more specialist nature.

**Suggested Methodology for Tower Hamlets**

**Overview**

2.28 We support Tower Hamlets’ approach of seeking to identify the Central Activities Zone and Tower Hamlets Activity Areas.

2.29 In accordance with the London Plan, we recommend that the Council identify Town Centre Boundaries (for the Major, District and Neighbourhood Centres), and Primary and Secondary Shopping Areas (for the Major and District Centres) – although the Council may wish to clarify, with the GLA, that this is the correct way forward.

2.30 In our view it is important that, for larger centres, there is at least a Primary Shopping Area identified as well as a Town Centre Boundary. Applicants proposing new retail development must ensure that their proposal satisfies the sequential test, where town centre sites are preferred, followed by edge-of-centre and only then out-of-centre. “Edge of centre”, for retail purposes, is defined in PPS4 (Annex B) as “well connected to, and within easy walking distance (ie. up to 300 metres) of the Primary Shopping Area.” If no Primary Shopping Area is identified, it will not be unclear which locations are “edge”, giving developers more leeway to argue for development on sites which may be inappropriate.

2.31 There is little information in our Borough case studies to show how other Boroughs have approached their designations. However, using PPS4, the Practice Guide and our own experience we suggest a methodology below.

**Central Activities Zone and Tower Hamlets Activity Areas**

2.32 The Central Activities Zone (CAZ) is an area of intensive development and mixed use in Inner London, including both strategic and local uses. The CAZ and its Frontages are shown on Map 2.3 of the Draft Replacement London Plan, and we recommend that the Council take these forward.

2.33 The Tower Hamlets Activity Areas would be a new designation, in two locations:

- City Fringe
- Canary Wharf

2.34 In the case of the City Fringe, the Activity Area is likely to comprise the area of mixed uses in smaller units. The Aldgate and Whitechapel Masterplans may help to identify these.

2.35 In the case of Canary Wharf, the Activity Area is likely to comprise the mixed use area, including development sites, bordering the centre. Defining the Activity Area may be difficult due to the large number and scale of new developments coming forward.

2.36 For each location, the Council needs to think carefully about what the designation should achieve and consult with both the developers and planning officers involved in the proposed new schemes.
Town Centre Boundaries

2.37 These should be defined for Major, District and Neighbourhood Centres.

2.38 For each centre, the Council should start with diversity of use mapping on GIS. This could come from:

- Tower Hamlets’ Retail Audit 2007 – this was used to inform the Retail and Leisure Capacity Study 2009. However, it is now dated and the Council would need to visit each of the centres to update it.

- Goad data – town centre maps and use class data for the larger centres (Canary Wharf, Bethnal Green, Whitechapel and Roman Road – although it is not clear whether this covers East, West or both) is commercially available from Goad. Depending on the size of the centre, it may only be surveyed annually, so the Council may need to do site visits to check the data, or at least do spot checks. It is important to note that Goad use their own “activity area” to define a town centre rather than the Council’s existing boundary. This could be useful as it could indicate where a particular centre should be extended to include additional areas of town centre use.

- Other commercial data – comprehensive use class data may be available from other commercial sources. Again, it will be important to check when the centres were last surveyed, and update them or do spot checks if necessary. An advantage of obtaining such data is that it may cover all units rather than just those in existing centres – and would therefore help the Council in identifying the boundaries for new centres.

2.39 The diversity of use data should be overlaid with the current town centre boundary, if defined. The Council should then consider:

- The main concentration of town centre uses. The town centre boundary should encompass this. PPS4 (para. 7) defines town centre uses as retail, leisure and entertainment facilities, offices and arts, culture and tourism.

- Whether the town centre is a compact, sustainable area. The Council should consider the location of the stations and/or bus stops, and the PTAL of the area, and ensure that the defined town centre does not sprawl into poorly inaccessible areas.

- Development sites. The Tower Hamlets Retail & Leisure Capacity Study (January 2009) identifies the key development sites in or on the edge of each centre, as part of the town centre healthchecks. Other development sites may have come forward since this time; the Council will need to check this, and consider including these sites within the town centre boundaries, if they are not already included. This is important because if the Council does not provide enough in/edge sites to meet the requirements for new retail floorspace as set out in the Retail and Leisure Capacity Study 2009, developers will have a stronger case for any out-of-centre retail schemes. We discuss capacity further in Section 4 of this report.

- Role and function of the town centres. Some parts of the defined town centre may no longer fulfil a town centre role. Where a town centre has a large area of vacant units, it may be better that this area is no longer protected by policy, to enable such units to change to other uses if there is a demand for this. Some town centres sprawl
along main roads and it can be challenging to decide on the “cut off” point, but a focus is needed if centres are to remain vital and viable.

- Some Neighbourhood Centres have declined to the extent that they now only consist of one or two shops, so they should no longer be identified as centres – this does not mean that the remaining occupiers should be pushed out, only that there will be flexibility for conversion to non retail uses, as long as this complies with Council’s policy to protect local convenience shopping. Conversely, some centres are set to grow to support housing or employment development planned nearby. The recommendations from the Tower Hamlets Retail & Leisure Capacity 2009 (as set out in Table 2.1 above) take account of the changing roles of the centres – the Council should review these recommendations and consider applying them.

- **Planned regeneration.** This is related to the role and function of the centres. Identifying town centre boundaries in areas where large scale regeneration is planned can be risky, particularly when defining a new centre. Identifying only the existing cluster of town centre uses can present a risk that the centre will be unable to grow the way enough to support the planned new development around it. Identifying too wide an area may mean that units are ultimately left vacant if surrounding development does not materialise.

- The Council should consult with developers – such as Poplar HARCA – planning large scale regeneration schemes, to ensure that the defined town centre is of a scale appropriate to meet the needs of its environs in future. In some cases, comprehensive redevelopment an entire centre, or provision of a new centre, may be included in the plans. The Council should also take account of Masterplans where these exist, eg Whitechapel.

2.40 When defining town centre boundaries, rather than drawing them tightly around existing buildings it can be useful to include the building curtilage. This allows flexibility for redevelopment of existing units.

### Primary and Secondary Shopping Areas

2.41 These should be defined for Major and District Centres only. Neighbourhood Centres often comprise only a few units so it would be difficult to identify separate areas within them, and this would be of little or no benefit to the centres.

2.42 The Council should again start with diversity of use mapping on GIS, and overlay this with any existing designations. The Council should then consider:

- **The main concentration of A1 Retail uses.** This should correspond to the Primary Shopping Area.

- **The location of any key anchor stores.** These should be included in the Primary Shopping Area because they are likely to be the key attractors to a centre and have the highest rents.

- **Any pedestrian survey work which has been undertaken.** The Primary Shopping Area should include the areas with the highest pedestrian flows.
- **The location of areas with a wider range of uses** - perhaps including A2 Services and A3-A5 Restaurants, Cafes and Bars. These should correspond to the Secondary Shopping Areas.

2.43 As suggested in the Retail Study, the Council may wish to consider defining an “evening uses” area in Brick Lane District Centre, to help control these uses. This would be the area in the northern part of the centre where there is a concentration of A3-A5 uses.

2.44 Again, it can be useful to include the building curtilage as well as just the existing buildings, to allow flexibility for redevelopment of existing units.
3 TOWN CENTRE BALANCE OF USES

Introduction

3.1 Town centres benefit from a sustainable mix of uses which support the main retail function. Other A Class uses (A2 Services and A3-A5 Restaurants, Cafes and Bars) are particularly important as they are likely to provide active frontages and ensure that there is activity in the centre throughout the day and evening.

3.2 In order to keep centres as the main focus for retail development but allow for other appropriate uses, it is useful both for development control officers and for applicants, for the LDF to include policies to manage applications for change of use in the Primary and Secondary Shopping Areas.

3.3 Below we look at policy and the case study boroughs, and then suggest a methodology for Tower Hamlets.

Policy context

PPS4 and Practice Guide

3.4 PPS4 at Policy EC3.1c states that local authorities should set policies which make clear which uses will be permitted in which locations. But there is no guidance on how to do this, either in PPS4 itself or in the Practice Guide.

3.5 Policy EC13.1 deals specifically with planning applications affecting shops, leisure uses including public houses or services in local centres, stating that local planning authorities should:

a. take into account the importance of the shop, leisure facility or service to the local community or the economic base of the area if the proposal would result in its loss or change of use

b. refuse planning applications which fail to protect existing facilities which provide for people’s day-to-day needs

c. respond positively to planning applications for the conversion or extension of shops which are designed to improve their viability.”

London Plan

3.6 As stated in the previous section, the Draft Replacement London Plan at Policy 2.15C states that Boroughs should: “identify town centre boundaries, primary and secondary shopping areas in LDF proposals maps and set out policies for each type of area.” But, again, there is no guidance provided on how to do this.

3.7 The Plan does states that different types of town centre related uses within or on the edges of centres can help to reinvigorate town centres, widen their roles and offers, develop their identities, enhance agglomeration benefits and encourage more sustainable modes of travel.
3.8 Policy 4.8c deals specifically with local and neighbourhood shopping, stating that Boroughs should “develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping."

**Tower Hamlets Policy**

3.9 Tower Hamlets’ adopted Core Strategy 2010 does not include policies to manage the balance of uses in town centres – these will be included in the forthcoming DPDs. Previously, the UDP 1998 provided a general policy (S2) on the “Core” area of District Centres, stating that this should be retained in primarily shopping use, with non-A1 uses favourably considered where they do not harm the character of these areas or detract from the function, vitality and viability of the centre. Outside of these core areas, Policy S3 stated that consideration would be given to permitting other uses which contribute to vitality and viability.

3.10 Tower Hamlets updated these policies as part of the Interim Planning Guidance 2007 which was withdrawn when the Council began work on the Core Strategy. Policy RT1 Primary Shopping Frontages stated that:

“Applications for the change of use from A1 in primary shopping frontages in town centres will be permitted where:

a) the change of use supports the function of the primary shopping frontage;

b) the surrounding residential area would remain within easy walking distance (300m) of the nearest convenience shop;

c) the need for the change of use can be demonstrated;

d) the use would not result in an over-concentration of non-A1 uses which would create a loss of amenity or loss of ground floor activity; and

e) in the case of vacant property, the applicant can demonstrate that the building has been actively marketed at values prevailing in the town centre and there is no reasonable prospect of reuse or refurbishment for an appropriate A1 class use.”

3.11 The reasoning for this was to ensure that people can access shops and services, especially those that are required on a daily basis, without difficulty. An over-concentration of non-A1 uses was deemed to be where more than three such uses are adjacent to each other.

3.12 There was also a policy (RT2) for Secondary Shopping Frontages, which set similar criteria but gave more flexibility for residential provision as part of mixed use schemes.

**Case Study Boroughs**

**Wandsworth**

3.13 Wandsworth’s Development Management Policies Document – Proposed Submission 2010 - includes the following policy:

“Policy DMTS 3: Core shopping frontages

In town and local centres, proposals involving ground floor units in identified core shopping frontages will be permitted if:
a. a minimum of 70% of units within the parade would remain in A1 use, taking into account unimplemented planning permissions for changes of use; and

b. the proposed use is an appropriate A class use complementary to the primary shopping function of the core frontage and should contribute to vitality and viability; and

c. the proposed use would not result in 3 adjoining non-retail uses in the parade; and

d. a shopfront is retained/provided."

3.14 There is also a policy (DMTS 4) regarding secondary shopping frontages, which requires applications to meet the same criteria, except that a minimum of 50% of units should remain in A1 use (rather than 70%).

3.15 These policies provide a useful model because they include clear criteria which applications can be measured against – ie would development result in the percentage of A1 retail units falling below a certain level or in three adjoining non-A1 units. However, no evidence is cited as to how the Council developed the policies.

Lewisham

3.16 The Draft Area Action Plan (AAP) Preferred Options 2007 for Lewisham sets out policies for the management of “core” and “non core” shopping areas (which the Council plans to relabel as Primary and Secondary Shopping Areas).

3.17 Policy LTC SH5 states that within the Core Shopping Areas:

“The Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions:

(a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1 uses and 70% maintained in A1 use);

(b) Whether the proposal will generate a significant number of pedestrian visits; and

(c) Whether the proposal uses vacant units (having regard both to their number within the centre as a whole and the Core Area and the length of time they have been vacant)."

All proposals for non retail development within Core Areas, including where relevant changes of use, should:

(d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and

(e) Where appropriate, provide attractive display windows and entrances that are compatible with adjoining shop units."

3.18 Policy LTC SH6 sets out similar criteria for considering development or change of use from an A1 unit in Non-core Shopping Areas. For these areas, the policy does not state that a specific percentage of units should be retained in A1 use, only that the percentage should not be unreasonably reduced.
3.19 Again these policies include clear criteria but no evidence is cited as to how the Council developed them.

**Hackney**

3.20 The Hackney Central AAP (2010) sets out a Town Centre Retail Strategy at Policy HCTC 09. This states that in new primary retail frontages, A1 and A3 use classes will be supported.

3.21 With regard to secondary shopping areas, the policy states that “a variety of use classes including A1 (shops), A2 (financial and professional services), and A3 (restaurants and cafes) will be supported at ground floor providing proposals do not result in a concentration of non-retail uses” (it does not define a concentration).

3.22 It goes onto state that “Other frontages may include use classes A4 (drinking establishments) and A5 (hot food takeaway) in addition to those above as well as community services offices, surgeries and consulting rooms, police use, other emergency services and public administration but will all be considered on their merits.”

3.23 In our opinion, Hackney’s policies do not provide as useful a model as Wandworth’s and Lewisham’s, because they do not set out clear criteria.

**Suggested Approach for Tower Hamlets**

3.24 We recommend that the Council set out policies to control the balance of uses in the Primary and Secondary Shopping Areas of the Major and District Centres. These policies should state that proposals will not be permitted if they result in the percentage of A1 units falling below a certain level or in non-A1 uses occupying more than a set number of consecutive units. This will be easy for the Council to monitor and is consistent with the approach taken by other Boroughs.

3.25 Monitoring the proportion of A1 retail units by setting a “threshold” percentage is straightforward. There is a problem in that the change of use of one large unit, whilst it may not result in the proportion of A1 retail units falling below the threshold, may result in a considerable loss of A1 retail floorspace in the Primary/Secondary Shopping Area. The alternative to this is to protect instead the proportion of floorspace, but this is more difficult to monitor and could result in all the A1 retail floorspace being contained in just a few units.

3.26 Monitoring the number of consecutive non-A1 units is also straightforward. The problem with this is that the change of use of one large unit (or the merging or more than one unit to provide a new use), may result in a considerable reduction in the length of A1 retail frontage. The alternative to this is to protect the length of retail frontage, eg stating that “there should be no continuous A1 retail frontage of less than 15 metres” but again this is difficult to monitor.

3.27 The first step will be for the Council to use GIS diversity of use data to determine, for each Primary and Secondary Shopping Area:

- The existing proportions of A1 retail units.
- The existing numbers of consecutive non-A1 units.
3.28 The next step is to decide, for each centre, whether to seek to maintain the current mix of uses, provide some flexibility for a wider range of uses, or seek to increase the proportion of A1 use. This will depend on the current and future role of each centre, and the Council’s aspirations.

3.29 We suggest that separate policies are provided for Primary and Secondary Shopping Areas, with the following policy wording:

Proposals for change of use to ground floors of class A1 retail premises will only be permitted where:

- The proposal is for class A2-A5 use; and
- The proposal will not result in the proportion of A1 retail units falling below [percentage to be determined] of the total premises in the [Primary Shopping Area/Secondary Shopping Area]; and
- The proposal will not result in non-A1 uses occupying more than [number to be determined] consecutive units; and
- The proposal will not harm the amenity of adjoining properties; and
- A shopfront is retained/provided.

3.30 Proposals will have to meet all of these criteria. It is likely that the policies for the Primary Shopping Areas and the Secondary Shopping Areas will state different required percentages of A1 units and numbers of consecutive A1 units.

3.31 Neighbourhood Centres, as discussed in the previous section, are too small to have defined Primary and Secondary Shopping Areas and in our opinion are too small for a policy controlling the percentage of units in A1 use to be feasible. Many Neighbourhood Centres have only a few units and so a policy controlling the number of consecutive non-A1 units would not work. However, we suggest that the Council include a policy to protect the loss of A1 convenience units in Neighbourhood Centres, to ensure that local communities continue to have access to small grocery shops within walking distance.

3.32 With regard to the Activity Areas, it is likely that these will incorporate some of the town centres. We suggest that A1 use in the Activity Areas but outside town centres does not need to be protected.
4 PROPORTION OF RETAIL TO BE DIRECTED TO EACH CENTRE

Core Strategy Figures and Recommendations

4.1 The Retail and Leisure Capacity Study 2009 set out Borough-wide requirements for new retail floorspace up to 2017, as well as recommendations as to where this should be directed. These figures and recommendations were carried forward into the Core Strategy, as follows.

4.2 A requirement for up to 17,700 sq m net of additional convenience retail floorspace in the following centres, based on maintaining current market shares but takes into account some of the overtrading currently taking place in the Borough’s stores and centres:
   - Bethnal Green
   - Roman Road
   - Whitechapel
   - Bromley-by-Bow
   - Crossharbour

4.3 A requirement for up to 16,600sqm net of additional comparison retail floorspace in the following centres, based on maintaining current market shares:
   - Canary Wharf
   - Chrisp Street
   - Brick Lane
   - Bethnal Green
   - Crossharbour
   - Bromley-by-Bow

4.4 The Council wish to break this down to provide guideline floorspace figures for each centre. We set out a suggested methodology for this below.

Suggested Methodology for Tower Hamlets

4.5 The Council will first need to identify the main development sites for convenience and comparison retail. The Retail Study, as part of the town centre healthchecks, identified the sites shown in the table below. The Council should check whether these sites are still available, and add any new ones which have come forward since the study was undertaken.
4.6 The Council will then need to establish the capacity of these sites for new retail development by:

- Examining any planning applications / permissions
- Examining any Masterplans
- Discussing with the case officers and developers

4.7 It will also be important to consider the Council’s aspirations for each of the centres where capacity is identified. Development should be appropriate to the scale of each centre – Canary Wharf is a Major Centre and the other centres with development sites are District Centres, and these are defined in PPS4 Annex B as follows:

- MAJOR CENTRE usually the principal centre in a local authority’s area.

Table 4.1 Retail and Leisure Capacity Study 2009 – Identified Development Sites

<table>
<thead>
<tr>
<th>Convenience Retail</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Bethnal Green</td>
<td>Site close to Bethnal Green station (although the Council are considering this for an Idea store).</td>
</tr>
<tr>
<td>Roman Road</td>
<td>Former Safeway store at 2 Gladstone Place</td>
</tr>
<tr>
<td>Whitechapel</td>
<td>Potential to extend and/or redevelop the existing Sainsbury store, which is overtrading. Also the masterplan encourages new developments with active ground floor uses to the south side of Whitechapel Road and New Road.</td>
</tr>
<tr>
<td>Bromley-by-Bow</td>
<td>Potential to extend and redevelop the existing Tesco store, which is currently overtrading, as the anchor for Bromley-by-Bow’s redevelopment</td>
</tr>
<tr>
<td>Crossharbour</td>
<td>Potential to extend and/or redevelop the existing Asda store, which is overtrading.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comparison Retail</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Canary Wharf</td>
<td>The proposed mixed use schemes at Wood Wharf and Millennium Quarter both include some comparison retail use.</td>
</tr>
<tr>
<td>Chisps Street</td>
<td>Opportunity to redevelop and intensify Chisps Street, to accommodate new floorspace and improve the retail offer.</td>
</tr>
<tr>
<td>Brick Lane</td>
<td>Truman Brewery site.</td>
</tr>
<tr>
<td>Bethnal Green</td>
<td>Site close to Bethnal Green station (although the Council are considering this for an Idea store).</td>
</tr>
<tr>
<td>Crossharbour</td>
<td>Opportunity to redevelop and intensify the Crossharbour centre, to include some comparison units.</td>
</tr>
<tr>
<td>Bromley-by-Bow</td>
<td>Potential to provide comparison units as part of Bromley-by-Bow’s redevelopment as a District Centre.</td>
</tr>
</tbody>
</table>
DISTRICT CENTRES usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.

4.8 It is inappropriate to have simply a large foodstore without an accompanying mix of town centre uses, because this does not function fully as a sustainable town centre.

4.9 Once the Council has established the key sites and what level of development would be achievable and desirable on them, the floorspace requirement can be broken down by centre. Any policy should allow, however, for flexibility should new development sites come forward in the future.

4.10 New retail development should also be closely monitored; at the time of the Retail Study, there was around 9,400sqm net retail floorspace which had planning permission but had not yet been built, and the permissions did not specify whether this floorspace would be convenience or comparison. Any of this which has been built out since the Retail Study was published should be deducted from the relevant requirement.

4.11 Finally, it is important to note the following recommendations from the Retail and Leisure Capacity Study 2009 (paras. 14.9-14.25) are considered when developing policies:

- The fact that the new retail floorspace requirements are directed to specific centres should not preclude retail development coming forward in other district centres within centre boundaries. Small scale developments in the district and neighbourhood centres should generally be permitted, as should small stores to support new housing developments.
- Applicants for new retail floorspace should be required to adopt the sequential approach towards site location, with town centre sites being the most preferable, followed by edge-of-centre sites.
- Any applications for convenience retail development that rely significantly on overtrading should be supplemented by further qualitative evidence. Such evidence might include field observations and consumer surveys relating to customer attitudes, congestion within stores and car parks, and pedestrian-vehicular conflicts.
- Any new planning permission for a new foodstore or extension should be subject to a condition restricting the amount of floorspace that can be dedicated to the sale of comparison goods, to protect the vitality and viability of existing comparison retailers and encourage linked trips.
CAZ Frontage - Wentworth Street

- No change
City Fringe Activity Area

• New designation
• See Core Strategy and Town Centre Spatial Strategy for more detail
Canary Wharf Activity Area

- New designation
- See Core Strategy and Town Centre Spatial Strategy for more detail
Canary Wharf Major Centre

- Town centre extended at the south-east corner to manage the town centre elements of the Wood Wharf master plan
- Consolidation of the northern boundary. The northern edge of Canary Wharf has been recognised by the Canary Wharf Activity Area
The boundary has been extended at the north eastern part of the town centre, to include the GP surgery, shelter and the public house between the Idea Store and Cambridge Heath Road.

The boundary has also been extended to the east of Cambridge Heath Road along Mile End road, to include to the row of A1, A2 and A3 units.

On the southern side of Whitechapel Road, the eastern extent of the boundary has been extended to the junction of Sidney Street and Mile End road, as these units generate high pedestrian flows and have a mixture of town centre uses.

The western boundary has been extended at the south side of Whitechapel road, to the west of New Road, where there are a number of shop frontages which provide A Class uses including restaurants, cafes and fast food outlets.

The western boundary of Whitechapel Road has been extended to include the community facilities as well the office shop frontages on the north side of Whitechapel Road.
Bethnal Green District Centre

- Northern boundary amended to include the Council One Stop Shop
- Secondary boundary extended south along Cambridge Heath Road to include the row of shops in a mix of uses and the new Sainsbury’s store.
The proposed supermarket at 2 Gladstone place is included within the primary area of the town centre.

St Paul's Church which has a cafe and community centre has been included within the town centre boundary.

The Council Property on Ewart place, the Bow idea Store, and St Stephens Health Centre have been included in the town centre, due to them all being town centre uses.
Roman Road West District Centre

• Minor change to include retail units at the crossroads of Globe Road and Roman Road.
Watney Market District Centre

- The boundary has been extended to include the mix of shop frontages along Chapman Street, between Watney Street and Cannon Street road.
- Watney Street, from the market south to Cable street has also been included within the secondary boundary as it contains retail uses.
- The primary boundary has been expanded to include active frontages on Commercial Road which include a mixture of Town Centre uses.
Chrisp Street District Centre

- All Saints DLR has been included within the town centre boundary as it generates footfall into the centre due to its role as an active transport node.
- The East India Hall (Public Baths) has undergone a bid to re-open, so considering its future use has been included in the secondary boundary.
- The fire station has also been included in the town centre boundary as it sits opposite the primary boundary and compliments the other public services including the idea store, market area, one stop shop, sure start centre, doctors surgery and other such facilities.
- The secondary frontage has been designated to the buildings on Kerbey Street which comprise the newly rejuvenated Financial Skills Academy and the Salvation Army both of which provide a mixture of community and economic functions and are contiguous to the primary shopping frontage.
- At the upper end of Chrisp Street a secondary frontage has also been added along the pedestrian footway. This section includes a health centre, public house and land uses.
Crossharbour District Centre

- The boundary was extended along Pepper Street to include the Health Centre
- Crossharbour DLR Station has also been included in the town centre boundary.
Brick Lane District Centre

- Existing town centre boundary retained as Primary Area
- Secondary Area created northwards along Brick Lane to include Truman Brewery, the Bethnal Green terrace along Bethnal Green Road, and part of Redchurch Street. This is to reflect the wide mix of retail, gallery, café and restaurant uses along Brick Lane.
In line with the Bromley-by-Bow Master Plan, areas surrounding Imperial Street were included in the town centre, where a new junction on the A12 will allow direct access to retail uses.

The draft Master Plan includes a food store within the proposed primary boundary where currently the land is derelict (formerly B1/B2) use.

The proposed secondary boundary encompasses an outdoor recreational ground, residential uses and the underground railway station which borders the development site for New Station West Plaza, a shared surface space that forms part of the U link, connecting the Community Spine with the station and neighbourhood centre.

The Master Plan also cites intentions to improve station access from the street level. The station also acts as an important node in the transport network Bromley-by-Bow tube station on the Hammersmith and City Line and District Line provide east-west connections with the City, Barking and Upminster.
Columbia Road Neighbourhood Centre

- Small addition from existing boundary to include the small row of shops on the north side of Columbia Road.
Wapping Lane Neighbourhood Centre

- No change to UDP neighbourhood centre
Ben Jonson Road Neighbourhood Centre

- Additional capacity provided to the neighbourhood centre to include the expanded retail planned for through the redevelopment of the Ocean Estate
- Extension of the boundary east along Ben Jonson road to reflect the new retail and PCT facility at the corner of Harford Street and Ben Jonson Road
- Areas of public realm included to encourage public realm improvements as part of the regeneration of the area
Manchester Road Neighbourhood Centre

- No change from UDP boundary
Stroudley Walk Neighbourhood Centre

- The town centre boundary, in accordance with the guidance in the Town Centre Spatial Strategy, includes the retail uses to the north, bordering Rainhill Way.
- The southern section of the presently defined town centre is revised, leaving out the small retail parade that borders Bruce Road. This is to consolidate the main hub of Fairlie Court and to reflect the focus on the main area of town centre activity which is to the north.
- The Public House north of Fairlie Court is included as an important town centre opportunity site/use in the future.
- Ground floor town centre related uses are recommended for the area immediately south and opposite of Fairlie Court.
Mile End Neighbourhood Centre

• Inclusion of active retail, civic and employment frontages/uses along Mile End road, Grove Road and Burdett Road taking into consideration the need to create a compact, sustainable and accessible area, that included the Mile End stations and bus stops (transport interchange) linking to QMUL to the West and residential neighbourhood to the south and east.

• To support the areas to be enhanced within the proposed town centre which relate to activities associated with town centre uses.
Aberfeldy Street Neighbourhood Centre

- Minor addition to include the Public house on the south eastern corner of the neighbourhood centre
Cambridge Heath Neighbourhood Centre

- New neighbourhood centre to include retail units along Hackney Road and north along Cambridge Heath Road
- Small row of historic shop fronts included along Bishop’s Way and south along Cambridge Heath Road
Poplar High Street Neighbourhood Centre

- Boundary extended to include the new and existing retail on the south side of Poplar High Street
- Boundary extended to include Poplar DLR Station as recommended by the Town Centre Spatial Strategy
- Also included is the area of public realm in front of the station, to help manage and justify the creation of a new public space in front of the station to be planned for through the Blackwall Reach master plan and associated studies
- Areas of public realm also included to recognise and help manage public realm improvements
Stepney Green Neighbourhood Centre

- Extended town centre as recommended by the Town Centre Spatial Strategy
- Extended to include Stepney Green Underground station
- Also included is the row of retail and other town centre uses along the northern and southern sides of Mile End Road
The town centre designation is based on the recommendations of the 2010 Adopted Core Strategy. The town centre consists of rows of shops along Commercial Road, the continuity of which is broken by minor roads leading north and south.

The designation extends east and west along Commercial Road to capture all of the shops to the west of the town centre and the Tesco Express and community facility at the east of the centre. Whilst Tesco and the community facility are removed from the ‘heart’ of the centre, these are considered to be town centre uses and important to the function of the centre and therefore have been included in the designation.

The designation also extends north into Barnes St. to capture the theatre, a key town centre use, and the row of shops opposite it.
The new centre includes the Waitrose store, 4 small independent retail units and a public house, serving the communities of St Katherine Docks, the western part of Wapping and the Preferred Office Location which adjoins centre to the north.
Hackney Wick Neighbourhood Centre

- New town centre designation as recommended by the Town Centre Spatial Strategy
- Town centre designated to include potential development sites focused in the area known as the ‘Hub’ which includes the improved Hackney Wick Station
- The proposed boundary has been developed alongside the proposals contained in the Fish Island AAP
Barkantine Estate Neighbourhood Centre

- The existing town centre area has been extended to the rear to include the building curtilages
- The boundary extended to include new and existing retail and town centre uses on Westferry Road
- Consideration could be given to extend this boundary further to recognise the Barkantine Centre – a new PCT facility
Westferry Road Neighbourhood Centre

- No change
Salmon Lane Neighbourhood Centre

- Western boundary of Salmon Lane extended to include the small row of shops to the north of Salmon Street