5. In the context of Policy CS14 of the Core Strategy, should Policy BHL7 establish criteria for the assessment of convenience retail units and/or cafes outside the local retail parades and the neighbourhood centre?

Relevant representations:

BhIps32 (IPIF) – Allowance should be made for some out of centre retail, where it does not undermine the role of the neighbourhood centre.

BhIps44 (Workspace) – Policy should acknowledge opportunities for out of centre retail.

Council response:

5.1 Policy CS14 from the Council’s adopted Core Strategy (document ref: KE165) seeks to promote successful and vibrant centres throughout the borough by directing town centre uses to designated centres, and securing a scale of development that is consistent with each centres role in the town centre hierarchy. It states that to create a sustainable distribution of town centre uses, ‘retail activities should be consolidated within compact areas of designated centres.’ This is in recognition of the existing pattern of retailing in the borough being characterised by a proliferation of commercial activities stretching along main road corridors.

5.2 Retail designations within the AAP area include a neighbourhood centre at Blackhorse Lane, and local retail parades in Higham Hill and Billet Road. As set out in the Core Strategy, the purpose of neighbourhood centres are to act as hubs for ‘local convenience shopping for local residents within walking distance of their homes’, whilst local retail parades represent small groupings of shops that provide primarily convenience goods. The areas covered by these designations are geographically well located to serve the AAP area. In particular, the neighbourhood centre is centrally located; where the highest density developments are anticipated.

5.3 Consistent with the adopted Core Strategy, London Plan (document ref: KE90) and the NPPF (document ref: KE157), Policy BHL7 of the AAP seeks to direct convenience retail units and/ or cafes to these designated centres within the plan area. It does so by directing new A1-A4 (and D1-D2 uses) to the neighbourhood centre, and managing change of use applications in existing local retail parades through the application of Development Management Policy 25: Managing Changes of Use in Town Centres (document ref: KE181).

5.4 Representations made by IPIF and Workspace, whilst supporting the Council’s broad approach to development in the neighbourhood
centre, highlight the opportunity for the AAP to outline how 'out of centre' retail proposals are addressed.

5.5 The Council believes that providing policy support for out of centre retail would undermine our broad strategy for town centre uses, and contradicts the policy direction of the NPPF, London Plan, and Core Strategy. The Council is of the view that adequate provision for convenience retail and/or cafes is made within the designated neighbourhood centre and local retail parades. Furthermore, it should be noted that land owned by both representors is only a short walk from the designated neighbourhood centre.

5.6 Nevertheless, the Council accepts that Policy BHL7 of the AAP could more clearly articulate how proposals for out of centre retail would be dealt with. Essentially, in such circumstances, the Council would assess proposals against criteria included in Development Management Policy DM 26: New Retail, Office and Leisure Developments; which provides additional detail and supplements the Council’s Core Strategy. This policy places an onus on developers to demonstrate in accordance with the NPPF sequential test that all 'in centre’ options have first been explored before 'edge of centre’ or 'out of centre’ sites are considered. As a locally distinctive approach, Development Management Policy DM26 also requires an 'impact assessment’ to be undertaken for proposals over 200m². This ‘impact assessment’ will enable the Council to firstly determine if out of centre proposals would have a negative impact on designated centres and parades, and also to ensure that larger proposals in local retail parades do not negatively impact on nearby neighbourhood, district centres or Walthamstow major centre. Justification for the Council’s approach is set out in paragraph 27.4-27.7 of the Development Management Policies DPD.

5.7 In hindsight, to provide greater clarity to plan readers, it is recognised that AAP Policy BHL7 would benefit from an additional cross reference to Development Management Policy DM26. It is therefore suggested that an additional policy point is added to read:

‘Any proposals for town centre uses outside of a designated centre will need to meet the requirements of Development Management Policy DM26: New Retail, Office and Leisure Developments.’

Word count:

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