

APPENDIX A

1. Introduction

- i The Council welcomes the opportunity to comment on the consultation draft: Planning Policy Statement 6: Planning for Town Centres.
- ii The Council welcomes any review which strengthens the role of local planning authorities in shaping town developments, districts and local centres.
- iii PPS6, with its emphasis on regenerating town, district and local centres will provide a reference point for the preparation of core strategy for the new LDF.

2. What the Government says

The revised Planning Policy Statement on Planning for town centres (PPS6) will encourage retailers to develop in town and city centres rather than build new stores in out-of-town locations. It will encourage the urban renaissance, drive development and promote social inclusion. The PPS places responsibility on local authorities to plan for growth in town centres and encourage their expansion where this will help further development.

3. Key Objectives

The Government's key objective for town centres is to promote vital and viable city, town and other centres by:-

- planning for growth of existing centres
- promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all
- enhancing consumer choice
- making provision for a range of shopping, leisure and local services
- allowing genuine choice to meet the needs of the entire community, and particularly socially excluded groups
- supporting an efficient, competitive and innovative retail and leisure sector, with improving productivity
- improving accessibility, ensuring that existing or new development is, or will be, highly accessible and well served by a choice of means of transport

4. Means of achieving the Objectives

The Government outline various ways in which local authorities can work towards attaining these objectives. They expect local authorities through the development plan to actively promote growth and development in existing centres and to:

- develop a hierarchy and network of centres;
- assess the need for further town centre uses and ensure there is the capacity to accommodate them;
- focus development in, and secure the expansion of, existing city, town, district and local centres as appropriate, and identify appropriate sites in their plans; and
- promote town centre management, creating partnerships to develop, improve and maintain the town centre, including the evening economy.

5. Paragraph 1.7 – Acceptable land use in Town Centre

The PPS, in paragraph 1.7 outlines the main types of development and land uses in town centres. These include:

- retail, leisure, entertainment facilities and the more intensive sport and recreation uses (such as cinemas, restaurants, drive-through restaurants, bars and pubs, night clubs, casinos health and fitness centres, bowling alleys and bingo halls);
- offices, both commercial and those of public bodies;
- arts, culture and tourism (theatres, museums, galleries and concert halls, hotels and conference facilities); and
- small-scale community facilities (including health centres, pharmacies, post offices, libraries and job centres).

Comments

The Government's attempt to indicate acceptable land use in town centres is inconsistent with the approach adopted in the other guidance. The list of land uses is rather long and there is the danger that this will increase the prospect of inflexibility by default but the main emphasis should be on retail use. It is more desirable to state clearly the nature of development that should not be promoted in town centres. Presumption against inappropriate development in town centres similar to the control over development in the Green Belt would be more appropriate (see PPG2 Para.3).

6. Positive Planning for Centres

Paragraph 2.1 and 2.2 encourage the promotion of vital and viable town centres by requiring that development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them. Local planning authorities should actively manage change by planning for the growth or, where appropriate, the decline of centres; define a network of centres with a more even distribution of functions, and a hierarchy of centres each performing their appropriate role to meet the needs of their catchments; adopt a pro-active, plan-led approach to planning town centres, through regional, sub-regional and local planning and use tools such as town centre strategies, to address the transport, land assembly, crime prevention, planning and design issues associated with the growth and management of their centres.

Comments

The Council acknowledges the need to promote vibrant and thriving town centres and sees these as drivers to the economic life of the community. This proposal will further initiatives already taken by the Council in terms of town centre strategy and management. However the notion of a town centre hierarchy and network of centres is not easily identifiable in existing built up areas where the town centres are a product of organic growth rather than planning principles. Most centres in Harrow perform multi functions and it is not always the case that functions can be more evenly distributed. In all probability the scope for redistribution of functions or the re-creation of a hierarchy of centres in built up areas is severely limited. This proposal is therefore more aspirational.

7. Promoting and Managing Growth in Town Centres

Paragraphs 2.3 – 2.6 relate to the need for local authorities to actively plan for growth in retail, leisure, office and other town centre uses over the plan period.

Comments

Local authorities already have the capacity to manage and promote growth in town centres. Most local authorities now have town centre strategies and town centre management initiatives. However, it is not very clear how the new emphasis on growth in town centres uses can be reconciled with the changes in PPG3 with the emphasis on allowing the loss of potential office and employment uses to residential use. Whilst the local authority may plan for growth the real choice of where development takes place is influenced by the perception and corporate strategies of the potential investors.

8. Network of Centres

Paragraphs 2.7 and 2.8 assume a network of centres arranged in hierarchical order. The PPS argues that in the context of promoting and enhancing existing centres, planning authorities should consider the pattern or provision of different centres – their network, roles and hierarchy. Network and hierarchies are dynamic and will change.

Comments

Whilst the concept on which town centre hierarchies are based may be relevant to new settlements, it is very difficult to translate this into practice in built up areas like Harrow. The scope for the designation of new centres or the creation of a network of centres or hierarchies is very limited and there remains only a remote possibility of creating new town centres in any of the existing towns and cities. The absence of any guidelines which could be used to determine the location of new centres could further fuel the prospect of creating new retail and office development similar to Brent Cross/Cricklewood and Blue Water.

Classification of town centres in graded subdivision is unlikely in most urban areas where the dynamic of change is gradual and slow. The hierarchy of town centres is not easily identifiable. The sequential approach advocated by the PPS is very much in line with the Council's current policy.

The concept of re-ordering town centres through redistribution of activities is impracticable and ignores market considerations. Higher level centres fulfil a different role (mainly for comparison goods). It is unrealistic to expect LPAs to distribute growth in comparison shopping to lower order centres; multiples simply won't go there.

9. A Pro-Active, Plan-Led System

Paragraphs 2.10 and 2.12 deal with the role of Regional Planning Bodies and Local Planning Authorities in the future planning of town centres. Both are required, inter alia, to assess the need for additional floorspace and the capacity of existing centres to accommodate new development. In addition, paragraph 2.14 advises Local Planning Authorities to work with business and other interested parties and:

- identify and allocate sites;
- review all existing allocations; and
- develop local strategies for ensuring equality of access to local facilities.

Comments

The respective roles of Regional Planning Bodies and Local Planning Authorities in assessing need for floorspace and the capacity of centres to accommodate development is unclear. Both are required to undertake similar assessments and the likelihood of conflict and duplication of effort is considerable. The scope and extent of the information needed to carry out such an elaborate assessment will be such that additional resources will be required, since any estimate or projection of floorspace requirement would rely on accurate forecasts based on good quality data. Such higher level data would draw heavily on local authorities' resources. The notion that local authorities should assess the overall need for additional floorspace over the plan period for land uses such as retail leisure and office and to consider where the identified needs would best be met is only possible if such detailed study required is backed by adequate resources.

10. Secure the Appropriate Scale of Development

Para. 2.33. Requiring LPAs to set out the maximum gross floorspace on an individual development which will be acceptable in different types of centres in their area.

Comments

This is unrealistic. The Council's view is that this should be determined by site and design considerations which cannot be prescribed in advance. Sites can be assembled for major new development. It would be impossible and potentially damaging to set size targets for this sort of development in local plans.

11. Consultation with Developers

Para 2.37 advises local planning authorities to be sensitive to the needs of developers and to consult with the development industry when planning for growth.

Comment

The Council agree that LPAs should identify sites capable of accommodating a range of business models but also expect developers to be flexible. In general terms this advice conflicts with that in 3.17 and 3.18. The latter gives carte blanche to the large format operators to argue that a town centre site would not be suited to their business model (because they would have to reduce the range of products or split their store). It would perpetuate out of centre development format for many retail types (DIY stores in particular). Retailers like Tesco and MFI, however, have clearly shown that they can operate a range of different models to suit site size and characteristics. The PPS should encourage them to bring forward the right model for the right site, even if the product range is reduced as a result.

12. Conclusion

The current proposal requires significantly more staff and resources than are currently at the disposal of local authorities. The need for more up to date information and plethora of research work required will lead to the engagement of more staff and the engagement of consultants at a cost beyond that which most local authorities can afford without additional help from central government.

A key point for consideration is the over emphasis on planning for growth. This may not be appropriate or required in all cases. Although planning for decline or consolidation is recognised (in 2.1 & 2.13) the clear and overriding message throughout is the need for growth. There is, however, no basis for this in a plan led system. Inevitably the needs of individual centres will vary. Many smaller district centres in particular are over shopped. Their future should therefore be planned on the basis of need and capacity and not simply to achieve a prescribed, and perhaps, inappropriate goal.