

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

MAIN MATTER 9:

TOWN CENTRES

Note: Where modifications are proposed as part of the responses below, text to be removed is set out in ~~strike through~~ font and new text is set out in **bold** font.

Town centre network

Q9.1 Is the definition of town centre used in the Plan clear and is it justified? In particular, is the inclusion of neighbourhood parades in the town centre network consistent with national policy and/or the London Plan?

Council Response:

- 1.1. Yes, the Local Plan provides a clear definition of town centres which aligns with the London Plan Policy SD8 Part C that recognises the role of smaller Local centres within the hierarchy of higher function town centres. The approach is supported by the Retail and Leisure Study (EB029), with recommendation LBN10 regarding the application of the national sequential test directing main town centre uses towards the Council's network of Metropolitan, Major, District and Local centres (including new designations), and recommendation LBN36 requiring the identification of primary shopping areas for existing Local Centres in line with NPPF.
- 1.2. Newham's approach to defining its town centre network is consistent with the London Plan Policy SD8 and Annex 1, which also promotes Local/Neighbourhoods centres as part of the London network, recognising their role alongside District centres to address deficits in access at a more granular, neighbourhood scale. The designation of Neighbourhood Parades further responds to London Plan Policy SD7 Part C.2 which requires development plans to also assess the potential for designating out-of-centre high streets as local parades (or business areas) and to develop appropriate policies to support and enhance the role of these high streets. The differentiation of neighbourhood parades as not meeting the 'town centre' NPPF definition is reflected in the application of impact testing set out in policy HS1 Part 4 (as further clarified through proposed modification MO39 set out in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan, SD004). Nevertheless, their identification as part of the town centre network supports their complementary role as part of the network and helps the Council apply the national sequential test in way which meets the Local Plan's spatial strategy.

Q9.2 (a) Is the existing town centre network of metropolitan, major, district and local centres defined in policy HS1 Table 3 justified and consistent with the London Plan? (b) Is the geographical extent of each existing centre and, where relevant, the primary shopping area and frontages justified?

Council Response:

- 2.1. a) London Plan Policy SD8 sets out the London Plan hierarchy of higher order town centres and clarifies that boroughs should undertake an assessment of their local context and need to identify District, Local and Neighbourhood centres. Appendix 1 of the London Plan classifies East Ham as a Major town centre and Stratford as a Metropolitan town centre with potential for growth to an International scale.
- 2.2. In developing the spatial strategy for the town centres network, Newham undertook a Retail and Leisure Study which assessed the vitality and viability of the existing centres (including local centres) and recommended their retained role the hierarchy (paragraphs 14.50 – 14.54, and LBN26).
- 2.3. The Retail and Leisure Study also undertook a gap analysis (Chapter 11) and provided recommendations for the further designation of existing high street frontages as part of new or extended local centre or neighbourhood parade designations (recommendation LBN26 and LBN29). These recommendations formed the starting point for additional work undertaken by

the Council and published through the Town Centre Network Review Methodology Paper 2022 (EB033) and its 2024 Update (EB034), where extensive frontages were surveyed in order to arrive at a conclusion with regards to their potential designation and their scale.

- 2.4. Policy HS1 Table 3 represents the outcome of the Council's extensive evidence base work and is in conformity with the London Plan.
- 2.5. b) Yes, the geographical extent of each existing centre and parade, and the extent of primary shopping areas for town and local centres, are justified by the recommendations of the Retail and Leisure Study (LBN6, LBN7, LBN32, LBN36, and paragraph 14.63 and LBN37) and the further assessment and identification of boundaries through the Town Centres Network Methodology Papers.
- 2.6. The Statement of Common Ground with the LLDC Part 1 (SD058) confirmed their support for the boundaries of town centre designations in the LLDC area – Stratford Town Centre, East Village Local Centre and Sugar House Lane Local Centre – as identified on the Newham Local Plan policies map.

Q9.3 Are the changes to the existing town centre network proposed in policy HS1 justified, consistent with the London Plan and will they be effective in helping to meet identified needs for additional floorspace for main town centre uses? In particular:

- a) Transformation of Stratford from a metropolitan centre to an international centre (referred to in Table 3).
- b) Creation of a new district town centre through re-configuring and capitalising on the trade draw of Gallions Reach Shopping Centre¹.
- c) Creation of four new local centres and expansion of three local centres on the site allocations specified in policy HS1 part 1(e).

Council Response:

- 3.1. As set in response to Q9.2 above, the Council has undertaken extensive work through the Retail and Leisure Study and the Town Centre Network Review Methodology Paper 2022 (EB033) and its 2024 Update (EB034) to identify retail growth need and to assess and address gaps in access of the existing designated town centres network, in line with London Plan Policy SD8. This has resulted in the identification of new designations and of future extensions to existing designations, including those set out under Policy HS1 part 1(e). The evidence base, and further information provided in response to Q9.12 below, demonstrates that the growth of the town centre network is deliverable (largely based on existing permissions) and will be effective in meeting the identified needs for retail and leisure, as well as accommodating other main town centre uses to help provide a diverse offer to meet local needs.
- 3.2. a) Stratford's potential to become an International centre is supported by the London Plan Annex 1 and by the Retail and Leisure Study (2022), and its reflection in policy HS1 and the implementation text has been welcomed by the LLDC and developers. As set out in response to Q9.12, the extant permissions and remaining allocated development land within the boundary of the centre will provide substantial additional growth to support the evolution of the centre to an International scale. Further, in assessing the potential growth in comparison retailing the Retail and Leisure Study recognised that the high levels of projected growth in the Stratford/LLDC/West Ham will help consolidate the role of Stratford as a Metropolitan Town Centre and – into the future – an International Town Centre (paragraphs 14.37 and 14.39), while also accommodating the introduction of new local centres.

¹ This issue is covered in detail under matter 4 N17 Gallions Reach neighbourhood and N17.SA1 Beckton Riverside.

- 3.3. b) Please refer to Council's response to Matter 4, paragraphs 2.5-2.6. In line with the London Plan Policy SD8 Part C, the Plan designates the future town centre at Gallions Reach as a District level centre, pending confirmation through London Plan-making as to the likelihood of a higher, Major scale designation.
- 3.4. c) As set out in paragraph 3.1 above.

Q9.4 Does policy HS1 and/or the reasoned justification need to be modified to clarify that it is not intended to prevent new homes being built in parts of the borough, but to direct the location of main town centre uses?

Council Response:

- 4.1 The Council considers that the policy wording is effective as written, as set out in more detail in the response to the Further Preliminary Questions, FPQ2. The policy wording is specifically that 'All homes in Newham should be within [spatial accessibility objectives] through directing main town centre uses [...].'
- 4.2 Nevertheless, the Council recognises that, as the question of scope of the policy has arisen through engagement at Regulation 18 and Regulation 19, a further modification to the justification text of paragraph 3.76 may be beneficial to aid clarity. This is set proposed below:

Overall, the main objective of this policy is **not to impose limits on the location of new homes, but** to deliver a network of vibrant town centres, local centres and neighbourhood parades which offer unique and complementary experiences and that support choice within a network of well-connected neighbourhoods. To help achieve this objective, the Network's proximity and density criteria – the 400 metre radius and the 15 minutes walking distance – have informed the designation process, alongside the recommendations of the Retail and Leisure Assessment (2022). A number of existing and recently delivered high street locations have been designated through this Local Plan. **The resulting network of existing and future designations, alongside flexibility in establishing further new small scale frontages, ensures the Council can meet its aspiration that all homes should be within a maximum 400 metre radius of at least one designated centre or parade, or be within a 15 minutes walking distance of at least two designated centres or parades.**

Requirements for development within town and local centres

- Q9.5 Are the development requirements in policies HS1 and HS2 relating to development in town and local centres justified and consistent with national policy? In particular:
- a) The requirement in HS1 part 3 for development in new and expanded local centres to result in at least 20 non-residential units, the majority of between 80 sqm and 150 sqm floorspace, and continuous shopfront frontages in the primary shopping area.
 - b) The requirement in HS1 part 4 for developments in neighbourhood parades (or new non-designated small scale shopfront unit groupings) to result in between five and ten non-residential units, each with floorspace between 80 sqm and 150 sqm, and for impact assessments for proposals resulting in more than 1,000 sqm floorspace.
 - c) The requirements in HS2 part 2 relating to % of, and loss of, units in E class uses in primary shopping areas.
 - d) The requirement in HS2 part 6 for developments proposing a net total of 1,000 sqm or more floorspace to deliver at least 10% of floorspace as E class uses in units of 80 to 150 sqm that will be marketed and maintained at discounted rent.

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| e) The requirement in HS2 part 7 for proposals in town and local centres for 2,500 sqm or more floorspace in any main town centre uses to submit a marketing strategy demonstrating market demand for the type and range of units and uses proposed |
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Council Response:

- 5.1 Yes, the requirements set out in policy HS1 and HS2 relating to development in town and local centres are in conformity with the NPPF 90 and the London Plan Policy SD6. The policies present a place-specific approach to how the national and London Plan objectives of promoting vibrant, viable, diverse, accessible and safe town centres are to be achieved in Newham, as justified by the evidence base which includes the Retail and Leisure Study 2022, the Town Centre Network Review Methodology Paper 2022 (EB033) and its 2024 Update (EB034), and the Characterisation Study Chapter 9 Borough wide design principles (EB019).
- 5.2 a) Policy HS1 Part 3 draws on the recommendations of the Retail and Leisure Study for new Local Centres to draw on the health check analysis of the report (recommendation LBN27 and Chapter 11) and be scaled appropriately to the development and the geographic locality to meet needs arising rather than creating 'destination' retailing (recommendation LBN28). Newham's existing local centres tend to contain at least 20 non-residential units, as set out in Chapter 11 (Table 11.1 and paragraph 11.15), and this is taken forward in the policy as a preferred minimum scale, with the overall scale to be justified through a retail/leisure/office Impact Assessment.
- 5.3 The Retail and Leisure Study also recommended that the policy should encourage smaller unit sizes appropriate to local centres, between 80 and 150 sq m gross (recommendation LBN23), with further recommendations to use of tightly worded policies, allocations and eventually conditions to limit and control the type of uses within new local centres (recommendation LBN24-25). Site allocations delivering the new local centres will also include information on any social infrastructure required, which may also be located in the masterplanned local centres in line with requirements of policies SI2-4. Further forms of social infrastructure needed in each new local centre's specific locality (e.g. gyms, community centres or cinemas) may be identified at planning application stage. Therefore, policy HS1 Part 3.b is worded to promote the smaller unit sizes as recommended in the evidence base, with flexibility to allow for an appropriate mix to respond to local needs, as identified at masterplanning/ planning application stage through the Retail Impact Assessment and the Marketing Strategy.
- 5.4 The impact of shopfront design, including their clustering, on the success of new local centre frontages is evident from the delivery of past permissions in Newham. For example at Royal Wharf – Silvertown Local Centre – where non-residential units delivered at corners of blocks but with significant residential-only frontages in-between have not been successfully occupied, while the better clustered units along Royal Crest Avenue have been more successful (see survey mapping in the Town Centre Network Review Methodology Paper 2022, EB033, pg. 73). As footfall is a key driver of the success of new high streets, it is imperative that new local centres are masterplanned to optimise clustering opportunities by promoting continuous shopfront frontages along the key footfall route(s) alongside the careful design of the movement network (e.g. EB029, recommendation LBN15; EB019, section 9.2.1). The continuity requirement is not intended to be rigidly applied, as evident from the permissions already delivering new or redeveloped town and local centre frontages (e.g. EB033). The implementation section further refers to policy HS2, with Policy HS2.5 referring to "maximising continuity" of the non-residential frontages/shopfronts. Therefore, the Council propose a minor amendment to policy HS1 Part 3.d to consistently align with the approach set out in policy HS2 Part 5:

d. Main town centre use units within the proposed primary shopping area should ~~create~~ **maximise opportunities for** continuous shopfront frontages along the key

footfall route(s), and be supported by quality public realm and by good permeability and connectivity.

- 5.5 b) As set out above, the Retail and Leisure Study recommended that units in the lesser hierarchy of the town centres network should primarily be small and should focus on Use Class E and social infrastructure. This requirement is transferred to the neighbourhood parades through Policy HS1 Part 4.a.
- 5.6 The overall scale of a neighbourhood parade, of between five and ten units, is intended to reflect their role in extending the accessibility of the town centres network, and not to fully meet identified local needs – this being the role of the higher town and local centres in the network. This scale reflects both existing neighbourhood centre designations (see examples in the Town Centre Network Review Methodology Paper 2022, EB033) and the recommendations of the Characterisation Study for providing local uses that support well-connected neighbourhoods (EB019, section 9.2.1).
- 5.7 The Retail and Leisure Study sets the impact assessment threshold in Newham at 300sqm GIA (recommendation LBN14). The Vacancy Prevention Strategy threshold is set through policy HS2 at 1000 sqm GIA. Recognising that Policy HS1 Part 4.d is unclear in this difference through its grouping of the two requirements, the Council has put forward a modification, reference MO39, in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan (SD004) to clarify that the impact threshold remains at 300sqm, consistently across the Plan.
- 5.8 c) The Retail and Leisure Study recommends the protection and promotion of Use Class E within the Primary Shopping Areas of town centres (recommendations LBN32 and LBN33) and within local centres (recommendation LBN25 and LBN29). Following survey work undertaken by the council in 2021-2022 during the preparation of the Plan, it became apparent that the majority of our existing town and local centres exceed the 70% Use Class E units threshold used at Regulation 18 stage in the policy. This demonstrates the importance of Use Class E for the vitality and viability of town and local centres in Newham, with a significant amount of main town centre uses falling within this use class. Therefore, to reflect the recommendations of the Retail and Leisure Study that policy should prevent the unjustified loss of Use Class E units in the Primary Shopping Areas, the thresholds were updated to broadly reflect the existing achieved levels. A summary table of the data, and including more recent surveying undertaken in 2024, is included in Appendix 1 (Tables 1 and 2). The implementation section provides clarity that the policy is intended to function as a balanced check, enabling the Council to respond to demonstrated demand and need for non-Use Class E uses while protecting important retailing and leisure functions, in line with NPPF 90 and the London Plan Policy SD6.
- 5.9 d) London Plan Policy E9 Part B.3 recognises the contribution that larger-scale commercial development proposals can make to the provision of small shops and other commercial units. It states that, where justified by evidence of local need, policies should secure affordable commercial and shop units. The importance of affordable commercial units for Newham's town and local centres was raised by the Retail and Leisure Study (recommendation LBN16), which recognised the significant presence and contribution of small independent/ethnic businesses to Newham's town centres' vitality and viability (e.g. paragraphs 6.8 for East Ham, 7.8 for Green Street, 8.12 for Forest Gate, 9.31.v for Canning Town), as well as the strong demand for affordable goods and services (e.g. paragraphs 5.38.iv, 7.18.v; 14.22). This matter was further explored through the follow-up Appendix 6 Topic Paper: Supporting Provision of Affordable Small Business Premises 2024 (EB032), which resulted in the requirement of the policy HS2 Part 6.a and its supporting implementation text.
- 5.10 Further, the Employment Land Review Appendix A (EB049) identified significant jobs growth in sectors associated with high streets, such as Accommodation & Food Services, Professional Services, Real Estate, Recreation, and Retail. This policy will ensure that the significant growth in main town centre use floorspace, and primarily retail and leisure uses,

planned across the borough will deliver balanced opportunities to support smaller businesses and start-ups by providing a pipeline of more affordable floorspace. This is all the more important in the context of the delivery of a new town centre at Beckton Riverside and a range of new local centres, where the lack of existing older stock and the typically higher rent levels of new stock may potentially impact on the ability of the new centres to provide a varied offer catering to diverse local needs.

- 5.11 The Assessment of Thematic Policies under the Integrated Impact Assessment identified a positive effect of the policy for the encouragement of growth of local businesses (Appendix F, pg. F102-F103).
- 5.12 e) London Plan Policy SD7 Part D requires development to be responsive to the size and the role and function of a town centre and its catchment, and to ensure that the commercial space responds appropriately to occupier needs such as unit sizes and basic fit-out. The Marketing Strategy requirement of policy HS2 Part 7 is in general conformity with this London Plan policy and is required in the Newham context of:
- 5.12.1 overall limited demand for retail properties (EB029, para 3.8, 12.24 and 12.25), strong competition in the commercial leisure sector (EB029, 13.5) and changing consumer trends (EB029, 3.4, 3.21, 14.15);
 - 5.12.2 persistent high vacancies in some newly delivered in-centre/new centre developments in the borough (e.g. Silvertown Local Centre surveying results set out in the Town Centre Network Review Methodology Paper 2022, EB033, Appendix 3 Urban Block Frontages Reviewed, pg. 98-99);
 - 5.12.3 the industrial demand-led transitioning of out-of-centre retail/leisure parks in the Beckton area to employment uses (e.g. Showcase Cinema site – Employment Land Review, EB048, para 4.117 - 4.119);
 - 5.12.4 the need to deliver large-scale commercial development as part of new town/local centres in Newham to address network gaps; and
 - 5.12.5 national policy tools being designed to assess impact of a proposal on other existing and planned town centres rather than on the likelihood of success of new large scale in-centre development.
- 5.13 Large scale town centre developments in Newham therefore need to be positively planned to respond to local needs as well as commercial demand trends rather than be speculative, an approach which has worked successfully for employment uses through the existing Local Plan (2018). The policy threshold of 2,500 sqm GIA aligns with the NPPF and London Plan thresholds at which town centre use developments are considered strategic.

Edge of centre and out of centre development

- Q9.6 Are the requirements in policy HS3 relating to development outside town and local centres justified and consistent with national policy? In particular:
- a) The requirements in part 2 for a sequential test for proposals for new or retention, re-provision, or intensification of retail (Ea), restaurants and cafes (Eb) and services (Ec) uses.
 - b) The requirement in part 3 for an impact assessment for proposals over 300 sqm floorspace for retail (Ea) and restaurants and cafes (Eb).
 - c) The restriction on use classes in part 4 (which Implementation box HS3.4 states will be achieved by use of planning conditions).

Council Response:

- 6.1 Yes, the requirements of Policy HS3 are justified by the findings of the Retail and Leisure Study (EB029) and are in conformity with NPPF 91, 94 and 95. The Council notes that the national sequential test and the impact test in relation to other main town centre uses is directed by other thematic policies as relevant to the use (policies HS9, SI2, SI3, J2).

- 6.2 Following comments received at Regulation 19 by commercial land developers, a modification was put forward to implementation section HS3.1 to clarify how the Council intends to respond to applications related to the asset management of existing retail parks, as set out in modification MO43 in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan (SD004).
- 6.3 a) Policy HS3 Part 2 sets out how the sequential test is to be applied in Newham in the context of retail (Ea), restaurants and cafes (Eb) and services (Ec) uses.
- 6.4 The Retail and Leisure Study (EB029, paragraph LBN27) recommended that the Council examine the extent of the GLA defined high streets to identify not just opportunities for designation as local centres or neighbourhood parades, but also to consider how shopping areas outside of designated boundaries that might be identified as not serving a purpose within the network could be released for other uses to support town/local centre consolidation and delivery of residential and other floorspace needs. London Plan Policy E9 Part C.6 also recommends that boroughs manage existing edge-of-centre and out-of-centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses, including for housing intensification, balanced against the recognition in London Plan Policy SD6 Part I and SD7 Parts C.2 and C.4 that non-designated high streets may yet play an important socio-economic role. This policy and evidence base context have resulted in Policy HS3 Part 2.b supporting an exemption to the sequential test for proposals for financial or business services (Ec) uses.
- 6.5 Further, as set out in the supporting text of policy D9, heritage assets can make an important economic contribution, and promoting them as visitor attractions is an important way of securing the appreciation of their significance. Characterisation Study mapping under Chapter 3 pg. 22 (EB010) also indicates that many of Newham's historic assets, are not within a town centres network designation. Therefore, policy HS3 part 2.a provides an exemption from the sequential test for smaller floorspace heritage assets in order to allow their continued operation within a Class E a-c use that would enable ongoing public access to them, with a complementary level of protection afforded to pubs and other cultural uses through application of Policies SI1, SI2, or SI3 as relevant.
- 6.6 The Green and Water Infrastructure Strategy recommendations (EB065) recognise the importance of provision of enhanced facilities to support parks (paragraph 6.4). The Creating places that work for Women and Girls – Handbook (EB028) recognises the importance of accessibility features such as toilets and the safety role of uses such as cafes in providing passive surveillance (Intervention 6: Public realm furniture, equipment, facilities and accessible features, pg. 94). This approach to multi-functional parks has been further requested by a resident through response received at Regulation 18 (SD038, reference Reg18-E-123/003). Consistent with the approach to enhancing the attractiveness and accessibility of green spaces set out in policy GWS1 Part 3, and the exception to where development in parks may be acceptable in Policy GWS2 Part 2, Policy HS3 Part 2.c sets a sequential test exemption for a small-scale restaurant or café (Eb) Use in a park.
- 6.7 The Characterisation Study provides borough-wide design principles (EB019), including on quality of residential ground floors. In the Newham context of historic high streets with limited building setbacks where retrofit of suitable defensive space may not always be possible, or where flood risk is relevant, there may be circumstances where it is preferable to retain a non-residential use to the ground floor, as set out through policy HS3 Part 2.d.
- 6.8 b) The NPPF 94 and the London Plan (Policy SD7, para 2.7.4) recognise that it is reasonable for LPAs to set a locally appropriate impact assessment threshold as reflected by local evidence base. The Retail and Leisure Study retains the impact assessment threshold for Newham at 300sqm GIA (EB029, recommendation LBN14). This is reflected in relation to retail (Ea) and restaurants and cafes (Eb) uses in Policy HS3 Part 3.
- 6.9 c) In line with the NPPF and the London Plan, the Plan takes a town centre first approach, unless the sequential test, and impact assessment where relevant, are deemed to be passed.

Nevertheless, evidence submitted with a planning application may only allow the planning authority to make a decision with regards to a specific use described. For example a retail use approved without condition limiting the uses could, under the flexibility within Use Class E, change to a restaurant (leisure use) or a health centre (social infrastructure use) without planning permission, impacting on the ability of the Council to direct these other uses in accordance with its policies, and particularly where the original permission did not test for the suitability of a non-retail use in an edge of centre or out of centre location. In order to protect the vitality and viability of town and local centres long term, as well as the integrity of the spatial strategy set through other policies of the Plan, Policy HS3 Part 4 clarifies the intention of the Council to limit uses to those assessed through the planning application before it. This approach is in line with NPPF 54. The further requirements for a Vacancy Prevention Strategy and where relevant a Marketing Strategy are consistency requirements, aligned with Policy HS2.

Markets and events / pop-up spaces

Q9.7 Is policy HS4 relating to markets and events / pop-up spaces justified and consistent with national policy and the London Plan?

Council Response:

- 7.1 Yes, Policy HS4 is justified and consistent with national and London Plan policies.
- 7.2 NPPF 90.c requires Local Plans to protect existing markets and where appropriate to promotes creation of new ones. Similarly, London Plan Policy E9 Part C.5 requires borough's Local Plans to support London's markets in their full variety, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres.
- 7.3 In Newham, the important role of markets to supporting the vitality and viability of town centres is set out in the Retail and Leisure Study through findings of the health checks and recommendation LBN18 (EB029). This is further reinforced through comments received from residents and elected members at Regulation 18 that recognised the importance of existing markets in diversifying the offer of centres and providing affordable business spaces, as well as the need for further investment in their physical characteristics and improvement in their offer (e.g. Reg18-E-021/00; Reg18-E-082/034; Reg18-T-002/056; Reg18-T-034/01). Policy HS4 further drew on case studies – such the example of Church Street, Westminster, set out in the GLA's guidance on High Streets and Town Centres Good Growth by Design - Adaptive Strategies (pg. 123- 135) – and engagement with the Council's Area Regeneration and Markets teams. Following comments received at Regulation 19 from Friends of Queen's Market, modifications were put forward by the Council to the implementation section HS4.1 to clarify what is meant by 'a pitch' (see SD004, modification reference MO44) and to the implementation sections of BFN3.2 and HS4.1 and HS4.3 to allow markets to be supported through the Health and Social Value Impact screening assessment (see SD004, modifications reference MO15.1, MO15.2 and MO15.3).
- 7.4 The Council considers that policy HS4 provides an effective framework to support the role of markets in Newham to a level proportionate with the evidence base and tools available through the planning system.
- 7.5 With regards to meanwhile activation of town and local centres through pop-ups, Policy HS4 Part 2 draws on the Retail and Leisure Study (paragraph 14.13 and recommendations LBN17) and the London Plan's recognition of the potential use of vacant properties and land within town centres for pop-ups or meanwhile uses for cultural and creative activities (Policy HS5 Part A.4).

Visitor evening and night time economy

Q9.8 Are the roles of the different town centres proposed in policy HS5 and Table 4, and the “less prominent” role for local centres proposed in part 3, justified, consistent with the London Plan and will they be effective in supporting the visitor evening and night time economy?

Council Response:

- 8.1 London Plan Policy HC6 Parts A and B places a responsibility on boroughs to develop a vision for the night-time economy with a focus on strategic areas of night-time activity and town centres where nighttime public transport is available. Table A1.1 identifies Stratford town centre as an existing night time economy centre of a regional significance (NT2 classification). No specific roles are identified for the other District and Major centres in Newham.
- 8.2 In line with policy HS6, and considering the key objective of the plan to improve access to culture and leisure opportunities within all neighbourhoods, Policy HS5 sets out a hierarchy for directing evening and night time economy to the network of existing town centres and the future town centre at Beckton Riverside.
- 8.3 The Retail and Leisure Study (EB029) Chapter 13 Leisure Assessment identified the trade draw of Newham’s six existing town centres for a range of leisure uses. It also assessed the function of Gallions Reach Shopping Park, as a proxy for the potential market draw of the future town centre at Beckton Riverside. The assessment identified strategic issues of quantity, access and quality for the majority of town centres, with only Stratford metropolitan centre functioning effectively, as further recognised by the London Plan classification. In the context of national trends showing growth in leisure spend and therefore demand (paragraph 13.8), as well as significant competition (paragraph 13.5), the study recommended that the Council may wish to consider a Night-Time Economy Strategy for the borough (recommendation LBN20), primarily focused on Stratford Metropolitan Centre, with development of this type elsewhere having a particular focus on managing safety and amenity.
- 8.4 In addition to the Retail and Leisure Study, the Council analysed [high street regeneration strategies](#) delivered through Regeneration initiatives. This identified a desire to grow the visitor evening and night time offer of all centres. However, given the findings of the Retail and Leisure Study and the absence in the London Plan of a clear definition of the ‘larger than local offer’ ENT3 classification (the lowest), the Council considered it more effective to indicate the aspiration to grow the town centres’ night time offer to meet local needs rather than aspire to create further strategic London Plan scale destinations. An exception to this approach was made for Green Street District Centre due to its recognised specialist South Asian fashion and jewellery offer and the strength of appeal of Queen’s Market. The [Newham High Streets Strategy: Green Street](#) (2021) notes that: “Green Street has been associated with the textile retail and jewellery industry since the late 80s when a large Asian population moved into the area, which gave it the nickname ‘Little India’. [...] With such a large Asian ethnic population in Green Street, there are strong international links of its businesses that cross national borders.”
- 8.5 The GLA did not raise any issues with regards to Newham’s evening and night time strategy set through policy HS5. The Council is working with the GLA on the emerging evidence base supporting the London Plan review, which will include an assessment of the existing and potential scales of evening and night time economy classification of all town centres in Newham.
- 8.6 In line with the recommendation of the Retail and Leisure Study that local centres should not compete with the higher hierarchy of town centres, and reflecting the strategic criteria for locating and growing the high time economy set out through London Plan Policy HC6 (including access to night time public transport), Local Centres are not promoted as Evening and Night time Economy Zones. Nevertheless, reflecting both spread of existing evening and

night time activity in existing local centres², as well as their convenient access for local residents, particularly in areas further away from the larger town centres, the policy provides a level of flexibility and support for local leisure and cultural expression by supporting a quarter of local centre units to function into the night.

- 8.7 Alternative options for the identification of evening and night time economy zones were assessed through the Integrated Impact Assessment (SD007, Appendix E, pg. E024-E027, E094-E101) and discounted due to having similar expected outcomes or having more uncertainty.
- 8.8 The strategy set out through Policy HS5 is effective because it provides a clear spatial strategy to prioritise the growth of visitor evening and night time uses, balancing both the demand and the challenges in creating successful, well managed clusters of visitor evening and night time activity within the town centres. The strategy will be monitored through the council's ongoing commitment to surveys of the town centres network, through future Retail and Leisure Study updates, and as part of the evidence base supporting the new London Plan.

Health and wellbeing on the High Street

Q9.9 Is policy HS6 relating to health and wellbeing on the High Street justified and consistent with the London Plan? In particular:

- a) The spatial restrictions on gambling premises and hot food takeaways in part 1.
- b) The requirement for operators to comply with various standards set out in parts 2, 3 and 4.

Council Response:

- 9.1 A key objective of the Local Plan is to support a healthier Newham and aging well, reflecting the evidence of ongoing health inequalities experienced by Newham's residents. These ambitions are reflected in and evidenced by the Council's '[Well Newham: 50 Steps to a Healthier Borough](#)' (particularly priority 25: Create a healthier food environment) and the '[Newham Aging Well](#)' (particularly priority 4: Community, Connection and Neighbourhood) strategies, which form part of the evidence base for policy HS6.
- 9.2 Engagement as part of the preparation of the Local Plan at every stage, demonstrates ongoing concern of residents, elected members and Public Health colleagues with the high concentration of hot food takeaways and gambling premises in the borough (see SD022, SD038 and SD049). Further, the evidence informing policy HS6 through the Council's strategies on health, and including statistical data set out in the Health Impact Assessment (SD007, Appendix I) and the Equalities Impact Assessment (SD007, Appendix J) summarised as part of the IIA (SD006, sections 5.10 and 5.11) demonstrate that there is an ongoing need to plan for a healthier environment in Newham, not just through managing uses that may lead to cumulative impacts, but also by promoting qualitative standards to enhance the offer in all neighbourhoods.
- 9.3 Policy HS6 brings together existing Newham policy approaches and London Plan approaches. Slight policy modifications have been made from the existing SP9, to simplify policy criteria in line with the recommendations of the Retail and Leisure Study and to ensure the quality of the offer in Newham's local centres is equally protected.
- 9.4 Policy SD6 of the London Plan seeks to promote a diversity of uses to support the vitality and viability of town centres, and implementation paragraph 6.9.5 makes it clear that boroughs should seek to manage over-concentration of uses such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and hot food takeaways. This approach is already applied in Newham through the existing Local Plan (2018) Policy SP9, which sets out a spatial

² As evidenced through licensing data mapping and then surveyed in 2024 – See Appendix 1, Figures 1a and 1b and Tables 3 and 4.

approach to managing the impacts of hot food takeaways, betting shops and adult gaming arcades and which the Retail and Leisure Study recommends should continue to be endorsed. Indeed, many local authorities have adopted policies for the control of hot food takeaways, gambling uses and other uses, and London Plan Policy E9 further sets restrictions for hot food takeaways near schools.

- 9.5 Newham's Authority monitoring reports ([2019-2022](#) and 2022/23, [EB002](#)³) indicate that the existing approach, established through policies since 2016, has been effective at reducing the risks of exacerbating inequalities, by limiting the proliferation of further takeaways and betting shops across Newham, and the concentration of other types of gambling premises in the town centres (District and above). Monitoring also indicates that some takeaways and betting shops have fallen away to other uses.
- 9.6 Overall, across all its parts, Policy HS6 respond to the London Plan requirements in a proportionate way to the Newham context, including by complementing significant work being progressed across the Council to support residents and strategically address health and wellbeing inequalities.
- 9.7 a) The Retail and Leisure Study 2022 (EB029) identified that hot food takeaways and gambling premises continue to be present in Newham's town centres to a greater extent than the national average and recommends that the Local Plan should continue to seek to restrict the concentration of such uses (see recommendations LBN24, LBN32, LBN33 and LBN34).
- 9.8 London Plan Policy E9 Part D sets out spatial restriction criteria for hot food takeaways in proximity to schools, an approach that has been taken forward in policy HS6 Part 1. This policy also requires boroughs to carefully manage over-concentrations of takeaways across their area, which the transition of the approach of the existing Local Plan 2018 into policy HS6 achieves.
- 9.9 Further, as set out above, London Plan Policy SD6 supports boroughs in developing policies to control the concentrations of gambling premises, and Newham have already established an effective strategy through existing policy, which is being taken forward and applied consistently to all types of gambling premises across the borough.
- 9.10 The Council undertakes regular surveying of the network of town and local centres in order to aid monitoring of policy and identify trends related to their health and vitality. The latest surveys were undertaken during 2021/22 and in the summer of 2024, and summary results for existing town centres are published under 'Town Centres Evidence Base Updates' as part of the monitoring framework for the Local Plan 2018⁴. The 2021/22 data has informed policy HS6 development, and the 2024 report provided updated information that indicates that the approach is both necessary (i.e. over-concentrations persist) and deliverable.
- 9.11 Therefore, Policy HS6 Part 1 is justified and in conformity with the London Plan policies SD6 and E9.
- 9.12 b) Newham Public Health [evidence informing the Well Newham: 50 Steps to a Healthier Borough](#), identified that food insecurity is affecting a significant part of Newham's households, and this is made worse by the food environment. Parts of the borough suffer from over-concentration of generic hot food takeaways selling foods high in fats, salts and sugar, while others have insufficient access to affordable, fresh food. In some cases, the issues overlap, with the report noting that "it is a landscape where good food is not accessible, either absent completely or crowded out and marginalised"
- 9.13 London Plan Policy SD6 implementation paragraph 6.9.8 and Policy E9 Part E specifically promote the use of the Healthier Catering Commitment as a tool to promote healthier food options for operators of takeaways, a requirement taken forward in policy HS6 Part 2. Through engagement with Newham Public Health colleagues, other similar and relevant food standards have been identified, such as Sugar Smart and Peas Please, that can complement

³ See indicators SP-OP-3: Healthy Urban Planning; SP-OP-18: Cumulative Impact; and SP-OUT-8 and 13: Town Centre Health.

⁴ 2025 published Town Centres Update, relaying data from 2024 surveying, is available [here](#).

the Healthier Catering Commitment, and these are promoted through policy HS6 Part 4 to all food-based uses (shops, cafes, restaurants etc.).

- 9.14 As set out through policy HS1 and BFN1, the town centres network is planned to expand in order to support the significant housing delivery expected in parts of the borough and to address existing gaps in the network. The qualitative criteria set out in Policy HS6 parts 2 and 4 are thus necessary to ensure that the development delivering new high streets, where over-concentrations do not yet exist, help support healthy placemaking and proactively manages and optimises health outcomes. Similarly, while change in established high streets will be slower and subject to a larger extent on windfall sites, it will be important to holistically promote good practice in order to tackle existing inequalities.
- 9.15 Gambling harms have also recently become the subject of national policy making, including through the statutory levy on gambling operators to help fund preventative measures introduced this year. This recognises the need for operators to play a proactive and transparent role in addressing the cumulative issues that arise from their business models. The Islington Local Plan Policy R8 Part D, adopted in 2023, provides a similar approach to the management of health and wellbeing impacts resulting from the operation of gambling premises, pay day loan shops and pawnbrokers as that set out in Policy HS6 part 3. Therefore, there is precedence and growing support for the principle of utilising planning policy to place responsibility on the operators to provide transparent and clear information for their customers, thereby supporting the local prevention and management of poor health and wellbeing outcomes.

Delivery-led businesses

Q9.10 Are the requirements in policy HS7 relating to proposals for dark kitchens / dark shops and micro fulfilment centres justified, consistent with the London Plan and effective?
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Council Response:

- 10.1 Retail and Leisure Study 2022 (EB029) identified that the continued rise of online shopping and home delivery dining are important trends affecting town centres (paragraphs 3.18 – 3.24), and that similarly the hybrid click and collect market is expected to grow substantially (paragraphs 3.25-3.26). ‘High Streets and Town Centres Good Growth by Design – Adaptive Strategies’ guidance published by the GLA (2020) also notes that London has an increasingly time-poor working population, which creates the need, desire and expectation of convenience, such as the availability of prepared food and same-day goods delivery, with recommendations in the report including the need to plan for ‘last mile’ delivery through micro-distribution hubs or micro-fulfilment centres (pg. 62).
- 10.2 The Local Plan responds to online shopping trends by planning positively for the diversification and adaption of town centres, while also helping support and guide delivery-led businesses through Policy HS7, which focuses on dark kitchens (commercial kitchens with focus on home delivery), dark shops (shops with no on-site customer access and with a focus on home delivery) and micro-fulfilment centres (smaller scale urban warehousing serving as sorting and last mile delivery points). These uses are newer, hybrid sectors merging retailing or hospitality with traditional employment land uses such as warehousing and general industry. However, they are also significantly different from typical industrial employment to their smaller floorspace scale, their need to be close to the customers base, their on-demand operational models, and likely amenity and transport impacts.
- 10.3 London Plan Policy E4 requires boroughs to provide a sufficient supply of land to meet current and future demands for industrial and related functions, including emerging sectors. Part B supports non-designated industrial sites, and part D sets out criteria for directing the spatial

strategy for supporting additional industrial capacity in a way that is flexible and responds to economic needs. London Plan Policy SD6 further requires boroughs to plan for the adaption and diversification of town centres to respond to the challenges and opportunities presented by multi-channel shopping, including through improved management of servicing and deliveries (Part B) and supporting and enhancing the varied role of high streets (part I). Policy HS7 Part C.2 further requires borough Local Plans to consider the protection of out-of-centre high streets as business areas.

- 10.4 Therefore, Policy HS7 is in conformity with London Plan Policies E4, SD6 and SD7 by setting out an appropriate spatial strategy for the delivery of new delivery-led businesses through Parts 1 and 2. The Site Options Test reflects the requirements of Policy E4 Part D by providing additional capacity, in addition to the network of employment designations, in areas suitable for 'last mile' distribution services (policy Part 4) and in areas which support access to supply chains and local employment (policy Part 5).
- 10.5 In their Regulation 19 response, Transport for London has expressed support for the policy approach to requiring in Parts 3 and 4 to provide accessible, safe facilities for couriers and to require a Travel Plan. This requirement responds to emerging evidence of the poor quality of working conditions for couriers, particularly those working at night, as set out in the justification of the policy (paragraph 3.112). Requirements related to safety and provision of active frontages is in conformity with London Plan Policy SD6 Part K.
- 10.6 Requirements for Travel Plans are consistent with Policy T3, while requirement for dark kitchens and dark shops to meet food standards are consistent with Policy HS6.
- 10.7 The policy provides clarity and consistency in how the Council will support the growth of delivery-led businesses in the borough, therefore providing an effective, positive framework. The policy has also received support from several developers, indicating that the policy is effective.

Visitor accommodation

Q9.11 Is policy HS8 relating to hotels and other forms of visitor accommodation justified and consistent with national policy and the London Plan?

Council Response:

- 11.1 The NPPF glossary identifies hotels, as a form of tourism development alongside other forms of visitor accommodation, as a main town centre use. Therefore, developments for visitor accommodation (Use Class C1) are subject to the 'town centre first' principles set out in NPPF 91. This approach is reflected in London Plan Policy E10 Part D, which sets out that priority for serviced accommodation (aka. visitor accommodation) should be given to locations in town centres and parts of opportunity areas that are well-connected to public transport (particularly to central London), and subject to the sequential test set out in London Plan Policy SD7 where relevant. Supporting paragraph 6.10.3 clarifies that boroughs beyond the Central Activities Zone are encouraged to plan proactively for new serviced accommodation in town centres.
- 11.2 Policy HS8.1 is consistent with the NPPF and the London Plan, by directing visitor accommodation to the network of town and local centres, existing and proposed, alongside the area within 15minute walking distance of the Excel centre that is a recognised work and leisure tourism attraction with an established base of hotels around it and good connectivity to central London via the DLR and the Elizabeth Line from Custom House.
- 11.3 The London Plan Policy E10 part C requires that a sufficient supply and range of serviced accommodation should be maintained, but does not provide a borough target. The London Plan also includes policies which promote other uses in the same strategic locations of town centres and opportunity areas, including requiring higher density housing delivery. Therefore, the London Plan sets the strategic context that promotes uses in relation to certain locations, and Borough's plan-making processes necessitate balancing the strategic context with the

evidenced need and demand for a range of uses, including hotels and housing. The priorities for Newham are set through policy BFN1, as supported by the evidence base, and does not prioritise visitor accommodation above other uses.

- 11.4 The Working Paper 88, 'Projections of demand and supply for visitor accommodation in London to 2050', GLA Economics, 2017 provided the evidence base for overall need to support the London Plan. Based on an assumption of continued past trends in delivery of hotel rooms, Table 14 of this study indicates that London Borough of Newham would have a projected demand for serviced accommodation between 2015 and 2041 of 3,031 net rooms. Authority monitoring reports for Newham and the LLDC indicate that, between 2015/16 and 2022/23, 2,192 visitor accommodation rooms have already been delivered. The delivery has primarily been focused in Stratford town centre, Canning Town town centre, and the area of the Royal Docks in the vicinity of the Excel Centre, reflecting the strategic approach set out through policy HS8 Part 1.
- 11.5 Of the London Plan evidence allocated demand of 3031 net rooms, there remained 839 rooms to be delivered between 2023/24 and 2041. Monitoring by Newham and the LLDC for 2022/23 showed that a further 1,085 visitor accommodation rooms were in the pipeline. More up-to-date development management activity up to 31st March 2025 indicates that, while two permissions for a total of 355 rooms have lapsed (none in-centre), a further 3 new permissions (2 in-centre) were secured for 273 rooms, with a further 2 permissions with resolutions to grant for 470 rooms. A further 756 rooms form part of proposals under consideration, and over 1,000 rooms are cumulatively being proposed under live pre-application discussions. The overall pipeline of hotel rooms remains strong and is likely to exceed the demand as set out through the evidence supporting the London Plan.
- 11.6 However, Newham is also at the forefront of an acute housing crisis and continues to have the highest levels of people housed in temporary accommodation in the country. Therefore, in order to effectively balance competing demands for land and to help meet Newham's housing needs, policy HS8 Part 2 requires applicants to demonstrate that any visitor accommodation proposed responds to market demand testing and the context of the site (scale of the centre and/or the tourism or employment function of the area it services), with the justification and implementation text setting out that the Council does not intend to support visitor accommodation proposals where the scale is partly facilitated by demand resulting from the homelessness crisis. To clarify this further, a modification has been proposed in the 'Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan' (SD004) with references MO45.1 and MO45.2. The Council considers this modification aids clarity in how competing priorities for land will be assessed and is consistent with policy H1 part 3.
- 11.7 Therefore, the Council considers that the spatial strategy for directing visitor accommodation as set out in policy HS8 is justified and consistent with national policy and the London Plan, and will be effective at balancing the need to support the tourism economy and the need to deliver housing.
- 11.8 A similar, though more restrictive approach is set out in Islington's Local Plan (2023) Policy R1 Part Q, where the Islington Council chose to prioritise delivery of other uses (in that case office/employment uses) on land otherwise suitable for visitor accommodation development, on the basis of evidence of need and that the Council had already met and exceeded its demand for visitor accommodation provision under the London Plan evidence.
- 11.9 The requirement for a Visitor Accommodation Management Plan is in conformity with NPPF 96 and 101 a), and London Plan Policy E10 part A and Policy SD9 regarding the management of town centres, including considerations of safety.
- 11.10 Finally, where a restaurant or other form of leisure that may be accommodated as part of a hotel use can be accessed by the public independently, this use can no longer be considered ancillary and therefore Policy HS8 Part 4 requires consistency with other sections of the Plan and related evidence base, including in relation to impact testing where a leisure use at or above 300 sqm GIA is proposed alongside visitor accommodation outside of a town or local centre.

Retail and leisure floorspace supply

Q9.12 Will the Plan be effective in ensuring that the need for additional retail and leisure floorspace can be met in a way that is consistent with the London Plan and national policy?
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Council Response:

12.1 Yes, the Plan sets out a positive strategy for meeting the retail and leisure needs in Newham, with a focus on delivery within the town centres network, which is consistent with the London Plan and national policy.

Approach:

12.2 The London Plan and national policy direct retail and main town centre leisure uses in accordance with the 'town centres first' principle.

12.3 The Retail and Leisure Study (EB029) undertook an assessment of retail floorspace need and of leisure uses demand, and recommended that:

- the growth should continue to be focused within the town centres network, including new centres/parades, with scale reflective of the hierarchy of centres (as set out through policies HS1 and HS2); and
- there is no need to allocate edge of centre or out of centre sites to deliver the need over the Plan period.

12.4 The overall approach to managing the growth and diversification of town centres, including the need for retail and leisure floorspace over the plan period, was explained through the Council's response to Preliminary Questions PQ37 and PQ38. Need for additional retail floorspace to 2038, using the GLA 2021 population growth estimates, was identified in the Retail and Leisure Study for a total of 4,085 sqm net convenience floorspace and 21,888 sqm net comparison floorspace, primarily focused on the Stratford and Beckton sub-areas, and to a lesser extent in the Canning Town and Royal Docks sub-areas. That is a total of 25,973 retail floorspace required in the borough to 2038, with potential for higher floorspace where population increase will be higher than projected through the GLA estimates.

Spatial strategy for distribution of retail need and leisure demand:

12.5 The growth of Stratford Town Centre to an International scale is supported through the site allocations N8.SA1 Stratford Central, N8.SA2 Stratford Station and N8.SA5 Stratford Town Centre West and the ongoing delivery of approved applications.

12.6 Other retail and leisure floorspace emerging in the Stratford area relate to the delivery of the emerging Local Centres at Sugar House Lane (now largely complete) and Plaistow North, new Pudding Mill Local Centre and new Carpenters Neighbourhood Parade.

12.7 Retail and leisure floorspace need in the Beckton area will be achieved primarily through the delivery of a new town centre at Beckton Riverside, the regeneration of East Beckton Town Centre, and the completion of Albert Basin Local Centre.

12.8 In the Canning Town and Royal Docks sub-area, while projected floorspace need is low, the Plan continues to support the delivery of a network of new local centres (Thames Warf and Connaught Riverside), extended local centres (Silvertown and North Woolwich) and a new neighbourhood parade (Lyle Park) in order to address the identified gaps in access in this part of the borough, as supported by the Retail and Leisure Study.

12.9 The Town Centre Network Review Methodology Paper 2022 (EB033) and its Update 2024 (EB034) set out the methodology and the assessment through which the preferred scale of new/extended designations is identified in the Plan. This took into account approved applications, starts and completions, as well as more recent masterplanning work being progressed where there was reasonable scope to include.

Pipeline and planned delivery

- 12.10 A summary of the likely delivery of retail and leisure (primarily food and beverage establishments) across the network of town centres and for the new and extended local centre and neighbourhood parade designations is set out in Appendix 1 (Table 5), including updated information on the planning history for each site and a summary of the completed or approved retail and leisure floorspace.
- 12.11 As set out in the Town Centre Network Review Methodology Paper 2022, masterplanning for the new town centre at Beckton Riverside is not sufficiently advanced, with this part of the site allocation expected to come forward in the medium to long term phase of the Plan. As such, the scale of town centre uses for this site have not been modelled in the evidence base. For the purposes of answering this question, the Council propose that the indicative scale of an average District or Major centre, as set out in the London Plan Figure 2.18 supporting Policy SD8: Town Centre Network provides a reasonable approach, i.e. a quantum of between 50,000 sqm and 100,000 sqm total floorspace. Further indicative breakdown may be achieved by applying the UK average floorspace composition of 15.6% convenience retailing, 31.6% comparison retailing and 25.7% leisure services (as set out in the Retail and Leisure Study 2022), resulting in an indicative scale of 23,600 to 47,200 sqm retail floorspace (E(a) Use Class) and 12,850 to 25,700 sqm leisure floorspace (Use Classes E(b), E(d) and Sui Generis). A significant proportion of the retail would likely represent the retention or reprovision of capacity currently at Gallions Reach Retail Park (approximately 20,000 sqm), with new floorspace providing for diversification of the offer.
- 12.12 Overall, the monitoring data shows that, recent completions since 2022/23, existing commitments and planned further growth focused in the town centres network will cumulatively deliver at least 35,000 sqm of retail and 75,000 sqm leisure floorspace⁵ (excluding Beckton Riverside Town Centre). This is sufficient to address the cumulative need of 25,973 sqm net convenience and comparison retail floorspace to 2038 (short-medium term) as identified in the Retail and Leisure Study 2022 under the GLA population projections model, and to meet the needs of additional growth in population above the GLA projections. Planning history also demonstrates that leisure uses will also be forthcoming across the town centres network, and primarily within Stratford, Canning Town and the Royal Docks and the Beckton areas where there is the largest planned population growth.
- 12.13 Therefore, taking into consideration the spatial strategy and the pipeline of permissions, the Council is confident that retail and leisure needs will be effectively met over the Plan period.

⁵ Note, where permissions are for flexible mixed use across a range of retail, leisure, business uses (e.g. former A1-A4 and D1/D2), we have assumed 45 percent of this is likely to come forward as retail and a 25 per cent as leisure. Where mix approved is only for retail and leisure, a 50:50 split is assumed.

Appendix 1 – Data supporting the council's response to Matter 9: Town Centres

Figure 1a: Licenced premises (gambling and alcohol sales), northern half of the borough

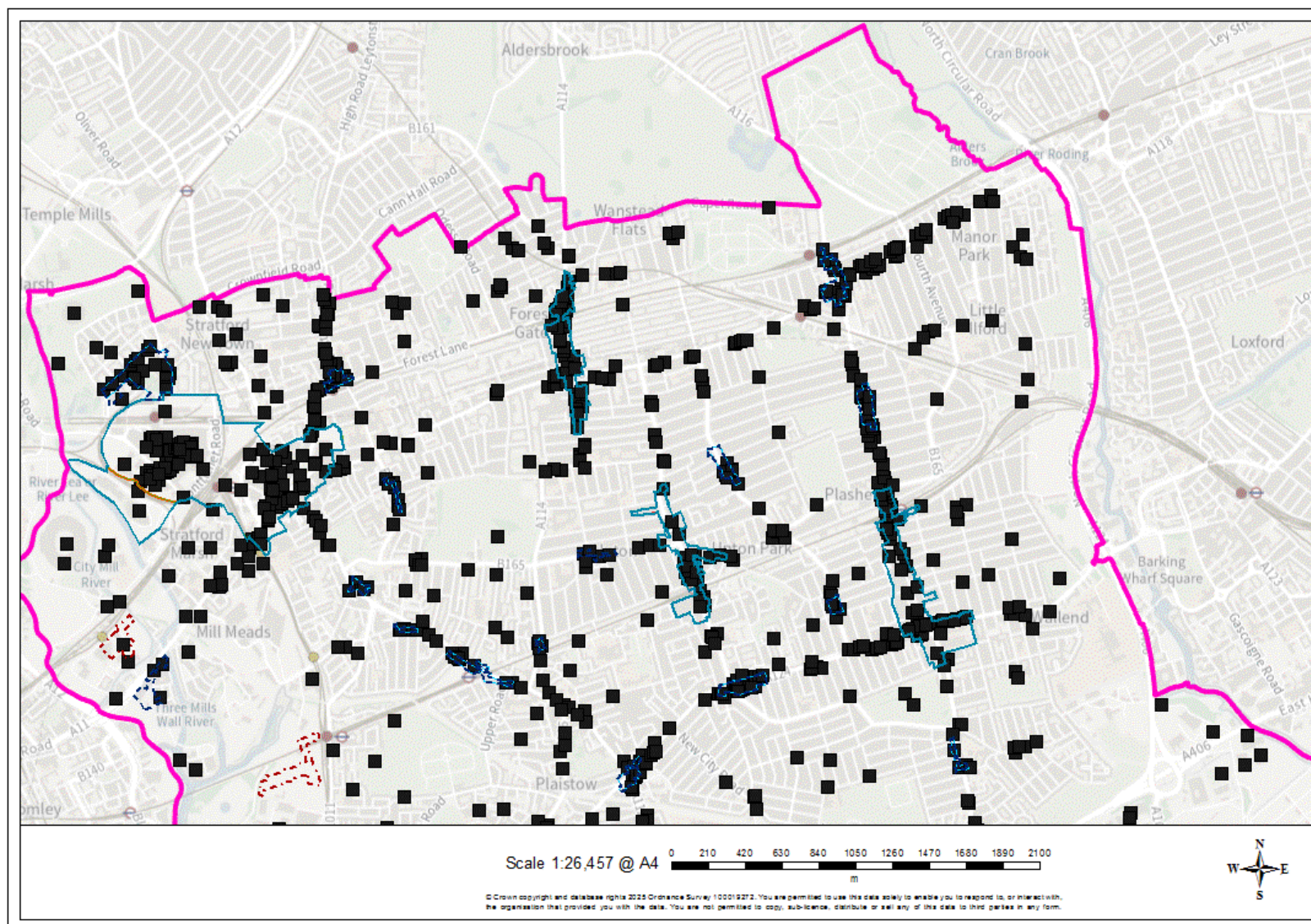


Figure 1b: Licenced premises (gambling and alcohol sales), southern half of the borough

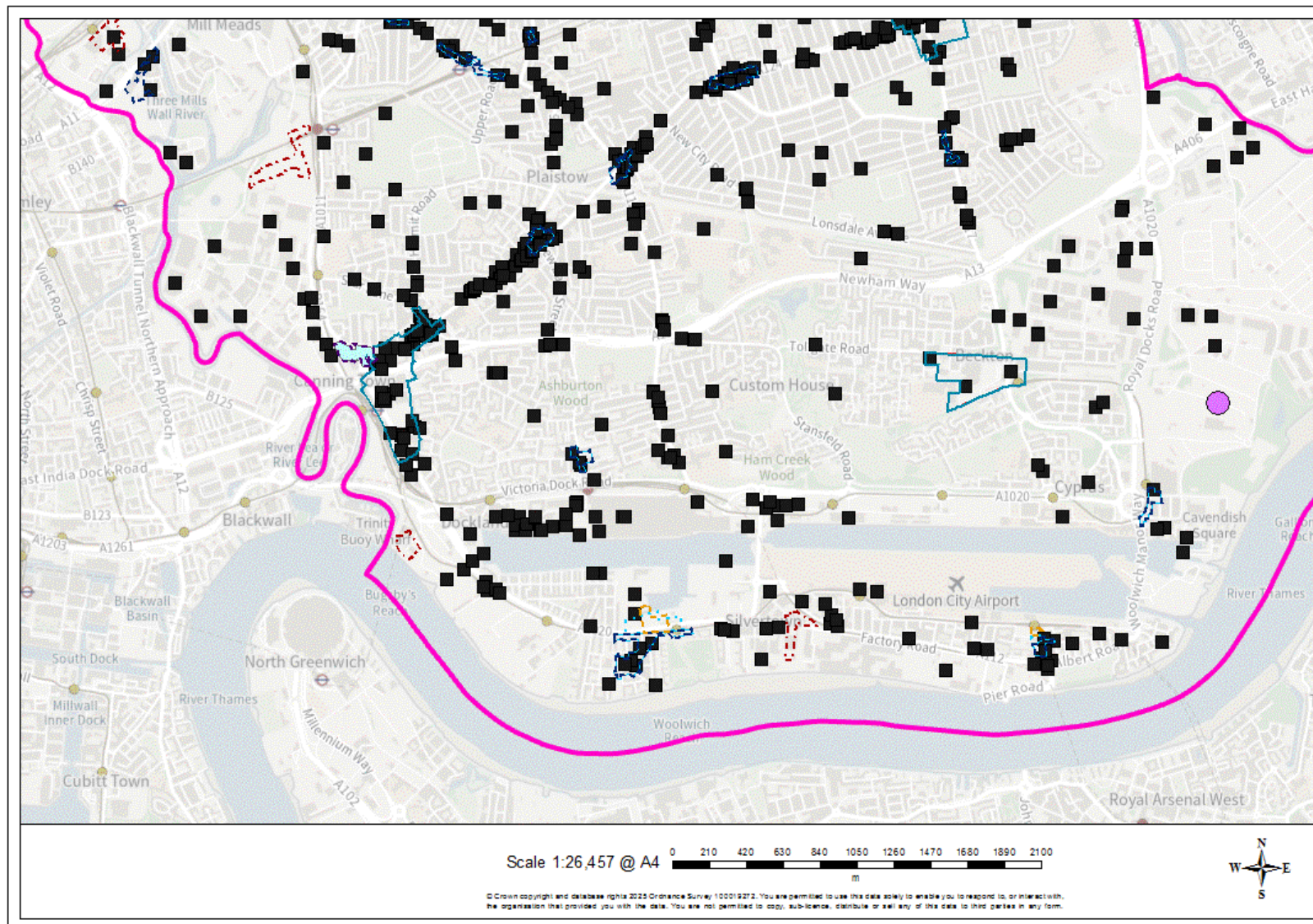


Table 1: Town centres 2024 survey results – Use Class E in Primary Shopping Area

Town Centre name	Total units	Total units in PSA	Total units in PSA vacant	Total Units in PSA in Class E (inc. vacant)	Percentage of E Use units in PSA
Stratford (non-LLDC)	276	87	5	82	94.25
Stratford (LLDC)*	424	414	unknown	409	98.79
Stratford total*	700	501	unknown	491	98.00
East Ham	257	167	10	139	83.23
Canning Town	204	49	4**	34	69.38
Forest Gate	248	62	6**	47	75.80
East Beckton	28	17	1	14	82.35
Green Street	438	327	14	298	91.13

* includes GIS data from LLDC surveying undertaken in 2024 (excluding Stratford Westfield), and business rates classification data for Stratford Westfield addresses.

** recently delivered units that are yet to be occupied and no use class has been attributed.

Table 2: Local centres 2024 survey results – Use Class E in Primary Shopping Area

Local Centre name	Total units	Total units in PSA	Total units in PSA vacant	Total Units in PSA in Class E (inc. vacant)	Percentage of E use units in PSA
East Village (LLDC data)	31	26	7**	21	80.76
Sugar House Lane	15	10	10**	0	0.00
Manor Park	96	42	4	37	88.09
Maryland	45	40	0	33	82.50
High Street North	70	52	5	45	86.53
Vicarage Lane – West Ham	38	22	2	18	81.81
Church Street – West Ham	21	10	0	9	90.00
Plashet Road	24	17	1	12	70.59
Plaistow Road	22	19	6	15	78.94
Terrace Road	14	14	3	12	85.71
Plaistow North	26	11	2	10	90.90
Boleyn	77	69	4	59	85.50
High Street South	24	18	0	13	72.22
Greengate	53	39	3	30	82.05
Abbey Arms	59	58	4	47	81.03
North Woolwich	24	11	2	8	72.73
Albert Basin	24	9	6**	3	33.33
Katherine Road Central	69	32	3	25	78.12
Katherine Road South	29	24	3	19	79.16
Silvertown	57	36	3**	24	66.66
Custom House	21	20	10*	15	75.00

* Units at Custom House vacated pending redevelopment.

** Recently delivered units that are yet to be occupied and no use class has been attributed.

Table 3: Town centres 2024 survey results – evening and night time (ENTE) Units

Town Centre name	Total units	ENTE* units	Percentage of ENTE units of total
Stratford (non-LLDC)	276	42	15.21
Stratford (LLDC)**	424	98	23.11
Stratford total**	700	140	20.00
East Ham	257	40	15.56
Canning Town	204	25	12.25
Forest Gate	248	18	7.25
East Beckton	28	4	14.28
Green Street	438	39	8.90

* ENTE units are units surveyed in use as per HS5.2 implementation Table 5, and with an opening time passed 6 p.m.

** includes GIS data from LLDC surveying undertaken in 2024

Table 4: Local centres 2024 survey results – evening and night time (ENTE) Units

Local Centre name	Total units	ENTE* units	Percentage of ENTE units of total
East Village (LLDC)**	31	7	22.58
Sugar House Lane	15	1	6.67
Manor Park	96	5	5.21
Maryland	45	2	4.44
High Street North	70	12	17.14
Vicarage Lane – West Ham	38	2	5.26
Church Street – West Ham	21	2	9.52
Plashet Road	24	2	8.33
Plaistow Road	22	2	9.09
Terrace Road	14	1	7.14
Plaistow North	26	2	7.69
Boleyn	77	7	9.09
High Street South	24	1	4.17
Greengate	53	2	3.77
Abbey Arms	59	3	5.08
North Woolwich	24	0	0.00
Albert Basin	24	1	4.17
Katherine Road Central	69	5	7.25
Katherine Road South	29	3	10.34
Silvertown	57	7	12.28
Custom House	21	0	0.00

* ENTE units are units surveyed in use as per HS5.2 implementation Table 5, and with an opening time passed 6 p.m.

** includes GIS data from LLDC surveying undertaken in 2024

Table 5: Pipeline and planned retail and leisure development in the Stratford, Beckton, and Canning Town and Royal Docks sub-areas of the Retail and Leisure Study, 2022/23 to Nov 2025

Centre/Parade (new/extension)	Retail and Leisure Study sub-area	Planning history (uses described as approved)	Delivery timescale
Stratford Town Centre	Stratford	<p>18/00470/OUT_LLDC (Stratford Waterfront), part completed, including 1,934 sqm of retail/food & drink floorspace (Classes A1-A5); Victoria and Albert East museum, 8,144 sqm of cultural floorspace (Class D1); Saddler Wells East, 20,770 sqm of performance venue floorspace (sui generis). Further delivery of up to 2,200 sqm of retail/food & drink (Classes A1-A5) uses.</p> <p>15/00358/OUT_LLDC & 22/00061/FUL_LLDC & 22/00068/FUL_LLDC (Cherry Park), completed, 9,724 leisure and entertainment (sui generis).</p> <p>16/00653/REM (Plot M7, International Quarter), completed, 706 sqm retail floorspace</p> <p>18/00354/REM_LLDC & 18/00355/REM_LLDC (Plot S4, International Quarter), completed, including 863 sqm retail (A1-A5) and 1,170 sqm leisure floorspace (D2).</p> <p>20/00146/OUT_LLDC and 24/00174/REM_LLDC (Plot S10, International Quarter), for 1,104 sqm of flexible retail (Class E (a-b)/Sui Generis drinking establishment/hot food take-away)</p> <p>For N8.SA2 Stratford Station, a further 13,379 commercial/Use Class E floorspace was modelled (Topic Paper - Site Capacity Study Summary - Part 2).</p>	Short-long term
Sugar House Lane Local Centre (new)	Stratford	<p>12/00336/LTGOUT, of which the below represent the emerging Local Centre boundary:</p> <p>Detailed elements of permission: 500sqm public house/bar (A4)</p>	Largely delivered, short term.

Centre/Parade (new/extension)	Retail and Leisure Study sub-area	Planning history (uses described as approved)	Delivery timescale
		<p>15/00250/REM, Plot MU2 completed 2022/2023 delivering 1,592m² of flexible A1 (shops), A3 (café and restaurant) and A4 (drinking establishments) uses.</p> <p>19/00417/REM, Plot MU4, delivering and additional 478 sqm of flexible Use Class E (a, b, c, g, i).</p>	
Pudding Mill Lane Local Centre (new)	Stratford	21/00574/OUT_LLDC and 22/00216/VAR_LLDC Approved (Sep 2023) with all matters reserved for up to 8,704sqm Retail and [leisure] (Use Classes A1-A5) and up to 1,622 sqm leisure (D2).	Short-medium term.
Carpenters Neighbourhood Parade (new)	Stratford	22/00360/OUT resolution to grant in February 2024 for up to 2,185sq.m(GEA) retail Use Class E(a), up to 730sqm (GEA) for a cinema and a maximum of 492sqm (GEA) for pubs/bars;	Medium term
Plaistow North Local Centre (extension)	Stratford	<p>17/00951/FUL, completed 2023/24, delivered 647sqm of retail (A1) and 1006 sqm of gym (D2).</p> <p>Further 1,008 sqm GIA commercial/Use Class E floorspace was modelled (Topic Paper - Site Capacity Study Summary - Part 1, N9.SA1 Plaistow North), broadly aligning with expired planning permission 17/02586/FUL for 1,045 sqm GIA retail (A1).</p>	Short-medium term, part delivered.
Canning Town (inc. potential extension)	Canning Town and the Royal Docks	<p>18/03506/OUT & 21/01302/NONMAT & 23/00606/REM (Manor Road), Phase 1 completed, delivered 762 sqm of flexible commercial (Class B1) and retail (Class A1/A2/A3/A4) floorspace, with a further up to 1,638m2 of commercial (Class B1) and retail (Class A1/A2/A3/A4) floorspace to be delivered in phases 2 and 3.</p> <p>17/04046/REM & 17/04045/VAR (Hallsville Quarter, Phase 3), completed 2023/24, delivered 8,180 sqm retail (Class A1- A5) and 1,545 sqm of assembly and leisure (Use Class D2).</p> <p>N4.SA3 Canning Town Holiday Inn was modelled in the Site Capacity Study Summary - Part 1 to provide approximately 2,200sqm GIA of flexible Use Class E.</p>	Short term.

Centre/Parade (new/extension)	Retail and Leisure Study sub-area	Planning history (uses described as approved)	Delivery timescale
Twelvetreets Local Centre (new)	Canning Town and the Royal Docks	17/01847/OUT Approved (Aug 2018) hybrid application for 5,400 sqm (GEA) of Retail [and leisure] Floorspace (Use Class A1-A4) , of which 2,025 sqm is being delivered in Phase 1.	Short-medium term. Phase 1 nearing completion.
Connaught Riverside Local Centre (new)	Canning Town and the Royal Docks	21/02450/OUT application withdrawn. Masterplanning assumptions informed the local centre boundary, allowing for approximately 2,000 sqm GEA of flexible Use Class E as modelled in the Site Capacity Study Summary - Part 2.	Short-medium term, in accordance with site allocation.
Silvertown Local Centre (extension)	Canning Town and the Royal Docks	22/02855/OUT recommendation to grant as per Committee Report 11 th Nov 2025 (deferred), with conditions for: <ul style="list-style-type: none"> • 6,500 sqm GEA site wide maximum Retail (Class E(a)) • 14,000 sqm GEA site wide maximum Food and Beverage (Class E(b), drinking establishments, hot food takeaway), including a 2,000 sqm GEA maximum drinking establishments and 500 sqm GEA maximum hot food takeaways • 2,500 sqm GEA site wide maximum Cinema (sui generis) • 5,000 sqm GEA site wide maximum Live music venue / theatre (sui generis). <p>Development zones DZ1 and DZ2, which include and surpass the local centre extension boundary, could deliver up to:</p> <ul style="list-style-type: none"> • 2,145 sqm GEA convenience floorspace; • 4,355 sqm GEA comparison floorspace; • 4,000 sqm GEA food and beverages floorspace; • 4,627 sqm GEA ancillary active use (within employment led plots). <p>Council's Sites Capacity Summary- Part 2 shows 7,221 sqm commercial retail and leisure uses were modelled.</p>	Short-medium term. Development Zones DZ1 and DZ2 would come forward in the next phase, following completion of the detailed residential component and groundworks.
Thames Wharf Local Centre (new)	Canning Town and the Royal Docks	18/03557/OUT Approved by Mayor of London for delivery of a minimum of 6,781 sqm (GIA) Flexible retail [and leisure] floorspace (A1-A4) , started. Parameter plans indicate approximately half of this floorspace will be concentrated in the local centre boundary, adjacent the new DLR station - 3,887 sqm has been modelled through the Sites Capacity Study.	Long-term. Local centre forms part of Stage 3 (Phases 9-11) of the development (parcels Q-U)

Centre/Parade (new/extension)	Retail and Leisure Study sub-area	Planning history (uses described as approved)	Delivery timescale
Lyle Park Neighbourhood Parade (new)	Canning Town and the Royal Docks	19/01791/FUL approved for 1,078 sq. m (GIA) comprising flexible commercial floorspace within Use Classes A1 - A3, D1 and D2 , started but stalled.	19/01791/FUL started, stalled. Short-medium term.
North Woolwich Local Centre (extension)	Canning Town and the Royal Docks	No relevant planning history. Site Capacity Study Summary - Part 1 modelled 738 sqm towards the site allocation requirement for a food store (retail) .	Medium term, in accordance with site allocation.
Albert Basin Local Centre	Beckton	14/00664/OUT & 18/01669/REM , Phase 2a, completed, delivered a further 1,500 sqm GIA of flexible (B1, A1-A4 and D1) Use floorspace . Council's 2024 survey identified one unit (67.7 sqm) was in use as a gym.	Completed 2023.
Neighbourhood parade at Beckton Riverside	Beckton	24/00989/OUT (Beckton Riverside Phase 1) resolution to grant (October 2025), which would deliver up to 5,000 sqm GEA Use Class E and up to 1,500 sqm GEA Sui Generis (food, drink and entertainment) uses .	Medium term