



# **New Southwark Plan BACKGROUND PAPER**

**Retail and Town Centre Uses  
December 2019**

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## 1. Executive Summary

- 1.1 The policy approach to managing retail and town centre uses is in full accordance with the approach set out by national and regional planning policy and informed by a robust evidence base prepared with specific reference to the economy in Southwark.
- 1.2 This paper explains the council's town centre network and hierarchy, the application of the sequential approach in Southwark, forecasts of retail floorspace capacity and expenditure, and the management of town centre uses.
- 1.3 The Southwark Retail Study 2015 and The Southwark Retail Study Old Kent Road update 2018 review the current performance of the borough's retail provision and forecast the capacity for additional retail floorspace until 2031.
- 1.4 Southwark's existing retail provision is comprised of 208,666m<sup>2</sup> (gross) of retail sales floorspace; 44% of the existing retail provision is accommodated within food stores and convenience goods shops; the remaining 56% of existing retail provision is accommodation in comparison goods shops.
- 1.5 Overall, Southwark's centres provide a healthy picture in terms of meeting the needs of the borough's residents for comparison, convenience and main town centre uses.
- 1.6 The available convenience goods spend in the borough was £1,296 million in 2014, it is estimated that the convenience goods expenditure leakage from the borough is around £77 million in 2014. The available comparison goods expenditure was £1,632 million in 2014, with expenditure retention ranging between 61% and 38%. The study suggests that the retention rates for comparison and convenience shopping are reasonable, in particular when acknowledging the proximity of central London shopping facilities.
- 1.7 The retail floorspace projections for Southwark were updated in the Southwark Retail Study Old Kent Road update (2018) which identifies that surplus expenditure 2031 (over and above commitments and proposals) could support an additional 16,303m<sup>2</sup> net (21,739m<sup>2</sup> gross) of comparison floorspace<sup>1</sup> and 1,954m<sup>2</sup> net (2,791m<sup>2</sup> gross) of convenience sales floorspace.<sup>2</sup>
- 1.8 The New Southwark Plan policies continue to support the increase in retail floorspace as forecast in the Southwark Retail Study (2018). Crucially, data from the London Development Database (LDD) highlights that between the financial years of 2011 and 2018 there has been a net gain through approvals of 35,518 m<sup>2</sup> of A1 use class space, and a net gain of 28,402 m<sup>2</sup> through completions. (See Appendix 5 for breakdown by year of approvals and completions).

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<sup>1</sup> Ibid., Appendix 3, Table 21

<sup>2</sup> Ibid. p.6

- 1.9 The strategy will seek to support an increase in the comparison goods floorspace throughout the borough and particularly within the Elephant and Castle, Canada Water, Peckham and the Old Kent Road Town centres. To help achieve our floorspace projection this plan anticipates the redevelopment of our key shopping centres in the three Major Town Centres, Elephant and Castle Shopping Centre, Surrey Quays Shopping Centre and the Aylesham Centre.
- 1.10 The approval of two significant applications in 2019, the Elephant and Castle Shopping Centre and the Canada Water Masterplan have formed a crucial part of the strategy to meet the forecast growth of retail floorspace. The Elephant and Castle Shopping Centre will deliver 3,102 sqm (net) A1-A4 floorspace and 2,806 sqm (net) A1-A4/B1 floorspace.
- 1.11 The Canada Water Masterplan has been approved seeking planning permission for Phase 1 and outline planning permission for future phases of the redevelopment of this site. The approved application seeks to deliver up to 88,432 m<sup>2</sup> of retail (Class A) across the Masterplan site, with a commitment to a minimum provision of 46,452m<sup>2</sup>.
- 1.12 The draft Old Kent Road Area Action Plan anticipates a growth in retail and sets out the intention to transform the Old Kent Road into a linear high street with shops, health, leisure and entertainment venues, restaurants and cafes.
- 1.13 For the Old Kent Road area, the Southwark retail study 2018 (over and above commitments and proposals) suggests that A1-A5 use class floorspace can be increased from 64,500 m<sup>2</sup> gross to 90,000 m<sup>2</sup> gross over the period, 2018-2031.
- 1.14 The ability of the town centres to accommodate the scale of assessed capacity for additional retail floorspace is highlighted in the site allocations methodology paper with a town centres uses (A1, A2, A3, A4, D1, D2) capacity of 133,022m<sup>2</sup> gross in designated town centres.
- 1.15 Section three of this background paper reviews the national, regional and local policy background informing the retail and town centre uses.
- 1.16 The National Planning Policy Framework (NPPF) places emphasis on the important role that the planning system has in ensuring sustainable development. This policy document sets out the need to take a positive approach to the growth, management and adaption of town centres.
- 1.17 The NPPF defines main town centre uses as 'retail development; leisure, entertainment and more intensive sport and recreation; offices; and arts, culture and tourism development. Crucially, it sets out the *sequential approach*, where main town centre uses should be located in town centres, then in edge-of centre locations and only if suitable sites are not available should out of centre site be considered.

- 1.18 This policy document also states that planning policies should define the extent of town centres and primary shopping areas, retain and enhance existing markets, allocate a range of sites to meet the scale and type of centres, and recognise the important role of residential development to ensure the vitality of centres.
- 1.19 The London Plan and draft New London Plan define the strategic approach for town centre development, designation and implementation, in particular, how the vitality and viability of London's varied town centres should be promoted and enhanced. The draft New London Plan places significant emphasis on good growth as inclusive growth, a successful, competitive and diverse retail sector
- 1.20 The plan states that the changing role of town centres should be proactively managed in relation to the London town centre network as a whole, a vital element of London's economy. Southwark has three Major Town Centres designated in the draft New London Plan: Peckham, Canada Water and Elephant and Castle/Walworth Road.
- 1.21 Southwark Council's Economic Wellbeing Strategy sets out the council's efforts to support local economic growth. The strategy is made up of four key pillars: Employment and skills, Business, Thriving town centres and high streets, and Financial wellbeing.
- 1.22 This background paper reviews a series of Area Action Plans and their approach to retail and town centre uses: Elephant and Castle Opportunity Area Planning Framework 2012, Peckham and Nunhead Area Action Plan 2014, Canada Water Area Action Plan 2015, and Draft Old Kent Road Area Action Plan 2017.
- 1.23 Section four, reviews the research and evidence informing our strategy for retail and town centre uses, the profiles of the existing town centres in Southwark, their roles and positions within Southwark's town centre network.
- 1.24 Peckham Major Centre has a total retail provision of 56,630m<sup>2</sup>, this level of retail provision is in line with Major Town centre classification.
- 1.25 Elephant & Castle (including Walworth Road) Major Town Centre has a total retail provision of 44,460m<sup>2</sup>, this levels of retail provision is generally in line with Major Town centre classification, especially when accounting for 45,000 new retail floorspace with the redevelopment of the shopping centre, including an additional capacity for retail floorspace of 8,500m<sup>2</sup> (gross).<sup>3</sup> The increase in retail floorspace will be provided from the redevelopment of Elephant and Castle Shopping Centre. The Elephant & Castle OAPF ensures that at least 10% of new retail floorspace is made available as affordable space.

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<sup>3</sup> *Southwark Retail Study*, p45

- 1.26 Canada Water Town Centre has an existing retail provision of 37,247m<sup>2</sup>,<sup>4</sup> whilst this is perhaps lower than what is expected for a Major Centre, it has been classified as such with regard to an anticipated additional retail floorspace. The Canada Water AAP and the Core Strategy both set out the potential for a net increase of around 35,000 m<sup>2</sup> of retail and leisure floorspace. The approval of the Canada Water Masterplan, an application seeking planning permission for Phase 1 and outline planning permission for future phases of the redevelopment of this site.
- 1.27 Section five, considers how the retail and town centre uses policies have evolved through consultation over the last 5 years.
- 1.28 Section six, sets out the retail strategy and how we intend to meet the identified capacity for growth in convenience and comparison retail floorspace.
- 1.29 The strategy will seek to support an increase in the comparison and convenience goods floorspace throughout the borough and particularly within the Elephant and Castle, Canada Water, Peckham and the Old Kent Road Town centres. To help achieve our floorspace projection this plan anticipates the redevelopment of our key shopping centres in the three Major Town Centres, Elephant and Castle Shopping Centre, Surrey Quays Shopping Centre and the Aylesham Centre.
- 1.30 The strategy continues to support main town centre uses to ensure town centre viability and vitality, through the provision of a diverse range of shop units, key social infrastructure, employment opportunities, leisure, arts and cultural uses, a thriving night-time economy and affordable space for small and independent businesses.
- 1.31 There has been a strong preference from consultation to protect A1 shop units in our town centres, and this has been a strong policy requirement as the NSP has developed. Protected shopping frontage surveys undertaken by the policy team have informed the thresholds of primary frontages in P32 of the NSP.
- 1.32 The retail study suggests that the approach of designating primary and secondary shopping frontages would help maintain a high proportion of A1 uses in the main town centre frontages, whilst also allowing greater diversification in the wider town centre. This approach has been adopted in Peckham, where the primary shopping frontage (SF1) has an A1 use threshold of 75% and the secondary frontage (SF30) has 50%.
- 1.33 Section seven, sets out a future review of the New Southwark Plan's retail and social infrastructure policies within the Major Town Centres, starting with Peckham Major Town Centre, with scope for a further review across the borough's main centres (including the Old Kent Road) following the completion of this project.

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<sup>4</sup> Southwark Council, *Canada Water Masterplan Planning Committee report* (2019)

## 2. Introduction

- 2.1. This background paper justifies the Council's approach to retail and town centre uses. This paper considers the following policies:
  1. P31: Small shops
  2. P34: Town and local centres
  3. P35: Development outside town centres
  4. P36: Protected shopping frontages
  5. P37 Shops outside protected shopping frontages, town and local centres
  6. P39: Betting shops, pawnbrokers and pay day loan shops
  7. P41: Pubs
  8. P47: Hot food takeaways
- 2.2. The paper draws on the policy requirements of the NPPF, the adopted and draft New London Plan and the evidence base which underpins the New Southwark Plan. This paper explains the council's town centre network and hierarchy, the application of the sequential approach in Southwark, forecasts of retail floorspace capacity and expenditure, and the management of town centre uses.
- 2.3. The paper considers how these policies have evolved through consultation over the last 5 years and seeks to address some of the remaining main objections that may arise in the Examination in Public. A separate paper on Offices and other Industrial land has been prepared to support the overall justification for the economic development policies in the New Southwark Plan.

### 3. Policy Background

#### National

#### National Planning Policy Framework 2019

- 3.1. The National Planning Policy Framework (NPPF) places emphasis on the important role that the planning system has in ensuring sustainable development. It defines this at a strategic level as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways; an economic objective, a social objective; and an environmental objective.
- 3.2. The economic objective is 'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'.
- 3.3. The social objective is 'to support strong, vibrant and healthy communities'.
- 3.4. The environmental objective is 'to contribute to protecting and enhancing our natural, built and historic environment'.
- 3.5. Section 6, *Building a strong, competitive economy*, sets out that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. Accordingly, planning policies should: set out a clear economic vision and strategy, set criteria or identifies strategic sites for local and inward investment to match the strategy and anticipated needs; seeks to address potential barriers to investment; and be flexible enough to accommodate needs not anticipated in the plan.
- 3.6. Section 7, *Ensuring the vitality of town centres*, sets out the need to take a positive approach to the growth, management and adaptation of town centres. The NPPF recognises the important role town centres have at the heart of local communities and the need to define a network and hierarchy of town centres. It also states that planning policies should define the extent of town centres and primary shopping areas, retain and enhance existing markets, allocate a range of sites to meet the scale and type of centres, and recognise the important role of residential development to ensure the vitality of centres.
- 3.7. The NPPF defines main town centre uses as 'retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development



(including theatres, museums, galleries and concert halls, hotels and conference facilities).<sup>5</sup>

- 3.8. This section sets out the *sequential test* to planning applications for main town centre uses. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 3.9. If an application is being assessed for a retail and/or leisure development outside town centres an impact assessment is required. The NPPF sets a default threshold of 2,500m<sup>2</sup> of gross floorspace for when such an assessment will be required. However, the NPPF does allow for locally set thresholds to be used where defined as appropriate.

## Regional

### The London Plan 2016

- 3.10. The London Plan is the spatial development strategy for Greater London setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 3.11. Policy 2.15 Town Centres, explains the strategic approach for town centre development, designation and implementation. In particular, how boroughs and other stakeholders should coordinate the development of London's network of town centres as set out in Map 2.6 and Annex 2 of the London Plan.<sup>6</sup>
- 3.12. The policy further sets out that town centres should provide:
1. The main foci beyond the CAZ for commercial development and intensification.
  2. The structures for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners
  3. Together with local neighbourhoods, the main foci for Londoners' sense of place and local identity.
- 3.13. London has a complex network of town centres and five broad types have been identified; international, metropolitan, major, district and local and neighbourhood.
1. **International Centres:** London has two such centres, Knightsbridge and the West End. International centres are defined as having globally renowned retail destinations with a wide range of high-order comparison and specialist shopping with excellent levels of public transport accessibility.
  2. **Metropolitan Centres:** The London Plan identifies 13 metropolitan centres. None of the metropolitan centres identified in the London Plan are located in Southwark. Metropolitan centres are generally located in outer London and

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<sup>5</sup> NPPF 2019

<sup>6</sup> Greater London Authority, *The London Plan* (2016), p.71 and Annex 2

serve wide catchments which can extend over several boroughs and into parts of the wider South East region. These centres generally have very good accessibility and a significant proportion of high-order comparison goods relative to convenience goods.

3. **Major Centres:** The plan identifies 33 major centres, including Peckham in Southwark. They generally contain over 50,000 m<sup>2</sup> of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They are characteristically important shopping and service centres with a borough-wide catchment.
  4. **District Centres:** London has 151 district centres. These include a number in Southwark: Lordship Lane, Elephant and Castle, Canada Water, Walworth Road, Camberwell.
  5. **Neighbourhood and more local centres:** typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 m<sup>2</sup>), sub-post office, pharmacy, laundrette and other useful local services.
  6. **CAZ Frontages:** a supplementary classification that refers to mixed use areas usually with a predominant retail function, in the Central Activities Zone. The most significant CAZ Frontages are identified in Table A2.1.
- 3.14. Policy 4.7 Retail and town centre development, supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres.
- 3.15. In preparing Local Development Frameworks (LDFs), boroughs should:
1. Identify future levels of retail and other commercial floorspace need
  2. Undertake regular town centre health checks
  3. Take a proactive partnership approach to identify capacity
  4. Resist inappropriate out of centre development, and manage existing out of centre retail and leisure development in line with the sequential approach.
- 3.16. Boroughs should encourage a diverse range of night-time activities, however local circumstances will determine whether night time activities should be encouraged in a particular zone or spread more widely.
- 3.17. Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services, states that boroughs and other stakeholders should support a successful, competitive and diverse retail sector which promotes sustainable access to goods and services.
- 3.18. In preparing LDFs, boroughs should:

1. Bring forward capacity for additional comparison goods retailing, particularly in International, Metropolitan and Major centres.
  2. Support convenience retail, particularly in District, Neighbourhood and more local centres.
  3. Provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping facilities, develop policies to proven the loss of retail and related facilities.
  4. Identify areas under-served in local convenience shopping and services provision and support additional facilities at an appropriate scale.
  5. Manage clusters of uses.
- 3.19. Policy 4.9 Small shops, states that in considering proposals for large retail developments Boroughs should, where appropriate, feasible and viable, provide or support affordable shop units.
- 3.20. Policy 2.10 Central activities zone – strategic priorities, intends to enhance the unique international, national and London wide roles of the Central Activities Zone (CAZ). The policy recognises the need to support and improve the retail offer of the CAZ for residents, workers and visitors.
- 3.21. Policy 2.11 Central activities zone – strategic functions, states that boroughs should identify, enhance and expand their retail capacity to meet strategic and local needs and focus this on the CAZ frontages.
- 3.22. Policy 2.13 Opportunity Areas and Intensification Areas, states that development proposals should support the strategic priorities for the opportunity areas set out in Annex 1.<sup>7</sup>
- 3.23. Annex 1 identifies four opportunity areas are in Southwark:
1. Canada Water - The Area has significant potential for mixed-use regeneration on infill sites and intensification of existing commercial sites focussed on the transport interchanges and the District shopping centre. Subject to retail demand Canada Water may evolve to become a Major town centre in the network.
  2. Elephant & Castle – significant potential for new retail provision integrated with a more efficient and attractive transport interchange.
  3. London Bridge, Borough & Bankside - potential for intensification, particularly at London Bridge station and its environs. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area.

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<sup>7</sup> Ibid., Annex 1

4. Old Kent Road – significant potential for residential-led development along the Old Kent Road corridor.
- 3.24. Policy 4.1 Developing London’s economy, promotes the continued development of a strong, sustainable and increasingly diverse economy across all parts of London. This includes ensuring the availability of suitable workspace and the wider infrastructure and environment necessary to support them.

**Draft New London Plan consolidated changes version (2019)**

- 3.25. The Draft new London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London.
- 3.26. Policy GG1 Building strong and inclusive communities, defines good growth as inclusive growth. It requires early and inclusive engagement, positive changes to the built environment, access to good quality community spaces and amenities, the generation of a wide range of economic and other opportunities. In particular, the policy requires those involved in planning to promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners.
- 3.27. Policy GG2 Making the best use of land, states that development of brownfield land must be enabled on sites within and on the edge of town centres, surplus public sector land and particularly in Opportunity Areas.
- 3.28. Policy GG5 Growing a good economy, sets out measures to conserve and enhance London’s global economic competitiveness. It requires ensuring London’s economy diversifies and that the benefits of economic success are shared more equitably across London. It also highlights making the fullest use of London’s network of town centres.
- 3.29. Policy SD4 the Central Activities Zone (CAZ), recognises that the unique international, national and London-wide roles of the CAZ and its rich mix of strategic functions should be promoted and enhanced. This includes the vitality and viability of its international shopping and leisure destinations and other CAZ retail clusters, including locally identified CAZ retail centres and specialist retail clusters. Acknowledging the challenges facing the retail sector, the CAZ is projected to have a demand for around 375,000 m<sup>2</sup> of additional comparison goods retail, 2016-2041.
- 3.30. Policy SD6 Town Centres and high streets, sets out how the vitality and viability of London’s varied town centres should be promoted and enhanced by:
1. Encouraging strong, resilient, accessible, and inclusive hubs with a diverse range of uses, including main town centre uses, night-time economy, civic, community, social and residential uses.
  2. Identifying locations for mixed-use or housing-led intensification.

3. Delivering sustainable access to a range of services and activities
  4. Strengthening the role of town centres as the main focus for Londoner's sense of place and local identity.
  5. Ensuring town centres are the primary locations for commercial activity beyond the CAZ and are important contributors to London's and the wider economy.
- 3.31. Adaption and diversification of town centres should be supported in response to challenges brought about by multi-channel shopping, changes in technology and new consumer behaviours.
  - 3.32. This policy also recognises the important role of new housing within and on the edges of town centres, it suggests this should be realised through mixed-use or residential development.
  - 3.33. The delivery of barrier-free and inclusive town centre environment should be seen as an important means to meet the needs of all Londoners.
  - 3.34. Policy SD7 Town centres: development principles and Development Plan Documents, outlines that boroughs should take a sequential approach. This is defined as a town centres first approach supported by the discouraging of out-of-centre development of main town centre uses.
  - 3.35. To support the town centres first approach development plans must assess capacity and future need for main town centre uses, allocate sites and review town centre boundaries.
  - 3.36. The policy highlights that the potential of existing out of centre retail parks to deliver housing intensification and to become more sustainable through improvements to public transport.
  - 3.37. Policy SD8 Town centre network, states that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, a vital element of London's economy. Deficiencies in the town centre network can be addressed by re-designated town centres at higher levels, new centres can be designated or town centre boundaries can be reassessed. Town centres with declining demand should be supported to diversify their town centre offer, or reclassified at a lower level within the town centre network hierarchy.
  - 3.38. The classification of International, Metropolitan and Major town centres can only be changed through the London Plan. Southwark has three Major Town Centres designated in the draft New London Plan: Peckham, Canada Water and Elephant and Castle/Walworth Road. The borough also has five District Town Centres: Bankside and The Borough, London Bridge, Camberwell, Lordship Lane, and Herne Hill.

- 3.39. Policy SD9 Town centres: Local partnerships and implementation, states that strategic and local partnership approaches should be supported and encouraged. The policy emphasises that partnerships should be inclusive and representative of the local community.
- 3.40. Policy SD10 Strategic and local regeneration, specifies the approach boroughs should take to achieve strategic and local regeneration. This includes effective engagement and collaboration with communities, alongside the identification of strategic and local areas for regeneration.
- 3.41. This policy highlights the role locally-sensitive policies and initiatives should have in the renewal of town centres in Strategic and Local Areas for regeneration. This is supported by Annex 1, which identifies the town centres that are within or intersect with Strategic Areas for Regeneration. In Southwark Canada Water, Elephant and Castle/Walworth Road, Peckham, Camberwell, Old Kent Road North and Old Kent Road South are town centres that are within Strategic areas for regeneration.
- 3.42. Policy D7 Public realm, addresses how development plans and proposals should encourage the creation of new public realm which is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, legible and easy to maintain.
- 3.43. The policy also recognises that some internal or elevated spaces can be considered part of the public realm, including markets and shopping malls.
- 3.44. Policy S1 Developing London's social infrastructure, states that when preparing Development Plans, boroughs should ensure that the social infrastructure needs of London's diverse communities are met.
- 3.45. The policy encourages new facilities to be located in high streets and town centres, and easily accessible by public transport, cycling and walking.
- 3.46. Policy E9 Retail, markets and hot food takeaways, states that a successful, competitive and diverse retail sector, particularly for town centres, should be supported. The policy states that boroughs should, identify future requirements and locations for new retail development having regard to the town centre policies of the new London Plan and local evidence for demand and supply.
- 3.47. The policy also states that development plan policies and site allocations should secure an appropriate mix of shops and other commercial units of different sizes. In particular, it highlights that large-scale commercial developments (over 2,500 gross A Class floorspace) should make contribution to the provision of small shops, where justified by evidence of local need.
- 3.48. Development plans and proposals should bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town

centres. Support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, this will help support a sustainable pattern of provision.

- 3.49. The policy also emphasises that London's markets should be supported, including street markets, covered market, specialist and farmers' markets.
- 3.50. Boroughs should also pay regard to the positive and negative impacts of clusters of retail on the objectives, policies and priorities of the London plan: town centre vitality, viability and diversity; sustainability and diversity; place-making or local identity; community safety or security; mental and physical health and wellbeing.
- 3.51. This policy also addresses the proliferation of A5 hot food takeaways in London and the creation of a healthy food environment. As such, development proposals containing A5 hot food takeaway uses should not be permitted within 400 metres walking distance from the entrance and exits of existing or proposed primary schools.
- 3.52. Policy HC6 Supporting the night-time economy, requires boroughs to develop a vision for the night-time economy, supporting its growth and diversification, particularly in the CAZ and town centres.
- 3.53. Policy HC7 Protecting public houses, acknowledges the role pubs have as a unique and intrinsic part of British culture. The policy states that development plan documents, town centre strategies and planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy and mixed used development.
- 3.54. Annex 1 – Town Centre Network classifies London's larger town centres into five categories as part of the Town Centre Network.
  1. **International centres** - London's globally-renowned retail and leisure destinations, providing a broad range of high-order comparison and specialist shopping.
  2. **Metropolitan centres** - serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 m<sup>2</sup> of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods.
  3. **Major centres** – are typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 m<sup>2</sup> of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. Southwark has three Major Town Centres designated in the London Plan: Peckham, Canada Water and Elephant and Castle/Walworth Road.

4. **District centres** - providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 m<sup>2</sup> of retail, leisure and service floorspace. Southwark has identified five District Town Centres: Bankside and The Borough, London Bridge, Camberwell, Lordship Lane, and Herne Hill.
  5. **CAZ retail clusters** – are significant mixed-use clusters located within the CAZ, with a predominant retail function and broadly comparable to Major or District centres in scale, Southwark has two CAZ retail clusters identified in Annex 1, Bankside and The Borough; and London Bridge.
- 3.55. Annex 1 also identifies centres which have a strategic night-time function involving a broad mix of activity during the evening and night.
  - 3.56. There are three night-time economy classifications
    1. NT1 – Areas of international or national significance
    2. NT2 – Areas of regional or sub-regional significance
    3. NT3 – Areas with more than local significance
  - 3.57. Southwark has one NT1 centre, Bankside and The Borough; three NT2 centres, Elephant and Castle/Walworth Road, Peckham, and London Bridge, and one NT3 centre Canada Water.
  - 3.58. Annex 1 provides strategic guidance on the commercial growth potential for the centres identified within the Town Centre Network. Three broad categories of future commercial growth are defined, high growth, medium growth, and low growth.

## **Mayor's SPGs**

### **Town Centres Supplementary Planning Guidance 2014**

- 3.59. This document aims to promote successful and vibrant town centres by providing practical advice for those preparing, scrutinising or contributing to planning policy, masterplans or planning applications relating to town centres.
- 3.60. Section 1, *Supporting the evolution and diversification of town centres*, states that in the future town centres will need to move beyond retail and become vibrant centres for living, culture, shopping, entertainment, leisure, business, civic, community and social infrastructure.
- 3.61. The chapter highlights the structural changes affecting the retail industry, in particular, online and multi-channel retailing. An increasing proportion of expenditure on retail goods being spent via the internet. London's town centres will be affected in varying ways, with larger centres in a stronger position to support multi-channel



retailing facilities and secure investment; smaller centres will face the greatest challenges to their retail base.

- 3.62. However, retailing will still retain its role as a vital part of London’s town centres. For example, retailing accounts for around £36bn<sup>8</sup> of household consumer expenditure in London and employs over 400,000 people in the capital.<sup>9</sup> Research by Experian suggests that: Expenditure on comparison retail is projected to increase from around £23bn in 2011 to £41bn by 2031. Expenditure on convenience goods is projected to increase from around £13bn in 2011 to over £19bn by 2031.<sup>10</sup>
- 3.63. The Experian research suggests that there is need for an additional 0.9-2.2 million m<sup>2</sup> comparison goods retail floorspace in London by 2036<sup>11</sup>. When schemes in the planning pipeline are taken into account London could still need an additional 0.4-1.6million m<sup>2</sup> of comparison goods retail floorspace.
- 3.64. The table below summarises the latest strategic projections for comparison goods floorspace need from Experian under the baseline, pipeline and quality scenarios.<sup>12</sup>

Scenario	Gross need million m <sup>2</sup>	Net need million m <sup>2</sup>
Baseline (excludes pipeline scheme)	2.2	0.9
Pipeline (including committed schemes)	1.6	0.4
Quality (includes pipeline and uplift in quality)	1.7	0.5

- 3.65. The table below which shows that 36% of the baseline need is in outer London, 18% in inner London and 46% in central London.<sup>13</sup>

	Baseline (m <sup>2</sup> )	Pipeline (m <sup>2</sup> )	Quality (m <sup>2</sup> )
Outer London	0.8	0.5	0.5
Inner London (excluding the CAZ)	0.4	0.2	0.2
CAZ	1.0	0.9	1.0
London	2.2	1.6	1.7

<sup>8</sup> Experian Business Strategies, *Consumer Expenditure and Comparison Goods Floorspace Need in London*, GLA (2013)

<sup>9</sup> GLA Economics, 2013

<sup>10</sup> Experian Business Strategies

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

- 3.66. The scenarios modelled still indicate that there is a substantial quantitative retail need in London overall. The guidance suggests that most of the additional demand will come forward as new or redeveloped floorspace.
- 3.67. Nevertheless, the guidance argues that London's town centres should adapt their retail offer, diversify and accommodate housing to attract footfall and sustain their vitality and viability.
- 3.68. Chapter 2, *Delivering mixed use housing intensification*, encourages boroughs to investigate the scope for mixed use intensification including residential development.
- 3.69. The guidance given to assess the potential for intensification in town centres includes: existing and potential level of density of development, public transport accessibility and capacity, planned transport improvements, the relationship of town centres to wider regeneration initiatives, retail and commercial rents, and vacant floorspace.
- 3.70. This section emphasises the role of design in ensuring successful high density housing intensification. This would require an approach which makes a positive contribution to local character and identity, promoting high quality architecture and supporting existing communities, amongst other objectives. Guidance is provided on approaches to active frontages, integrating housing and large-scale retail, tall and large buildings, servicing, car parks, integrating housing and social infrastructure, integrating small scale non-residential uses and housing.
- 3.71. Section three, *Quality matters*, provides guidance on public realm; the role of town centres in promoting safe, healthy, inclusive and lifetime neighbourhoods; supporting small shops and street markets; and the role of town centres in the response to climate change.
- 3.72. Section four, *Promoting accessibility and connectivity*, encourages boroughs to promote higher densities in town centres, in particular where there is high transport accessibility or where there are plans to improve public transport provision. Additionally, there is a recognition that higher density development can also help to support investment in new and upgrades to existing transport infrastructure and services
- 3.73. Section six, *Proactive town centre strategies*, provides guidance on town centre strategies, management of the town centre network, the London Plan town centres first approach, co-ordination with the wider city region and town centre health checks.
- 3.74. This SPG provides further guidance on the town centres first approach in the London Plan. Whilst reiterating the sequential approach set out in the NPPF 2019, it argues that the future of existing out of centre retail and leisure development should be evaluated.

## **Central Activities Zone Supplementary Planning Guidance 2016**

- 3.75. This SPG provides guidance on planning for the CAZ, acknowledging its diverse functions including business, culture, entertainment, shopping and tourism, education, and government.
- 3.76. Section 2: Managing the attractions of the CAZ as a Global Retail, Cultural and Visitor Destination; shows how the CAZ contains a range of nationally unique retail centres and clusters which perform different roles and functions within the London town centre network.
- 3.77. Despite the significant growth in online retailing, vacancy rates in the CAZ have fallen significantly over the period 2009-2016.<sup>14</sup>
- 3.78. The CAZ is projected to need between 700,000 to 900,000 m<sup>2</sup> of additional comparison goods retail floorspace, 2013-2036.<sup>15</sup>
- 3.79. The guidance introduces a general principle that large scale (over 2500m<sup>2</sup>) retail development and comparison goods should be focussed on the International centres, CAZ Frontages and other locations as defined in local plans.
- 3.80. The guidance emphasise the need to consider the quality of retail to meet the requirements of modern retailers, designed to be flexible and integrated within the distinct CAZ environments.
- 3.81. Specialist retail clusters and markets are supported in the adopted London plan and SPG. Street markets, covered and specialist markets also play an important role in the vibrant CAZ retail offer, including Borough Market in Southwark.
- 3.82. This section also addresses the contribution of the CAZ's leisure uses and evening economy to London's world city offer. The guidance encourages boroughs to identify and manage strategic and local clusters of evening leisure activities within the CAZ in order to address need, whilst seeking to minimise potential impacts of particular concentrations of night time uses.

## **Culture and the night-time economy Supplementary Planning Guidance (2017)**

- 3.83. The purpose of this SPG is to give advice on implementing policies with a bearing on London's culture and the night-time economy in the 2016 London Plan.
- 3.84. This SPG highlights that the night-time economy brings £26.3bn to London's economy every year, accounts for 1 in 8 jobs and 10% of employment in town centres.<sup>16</sup>

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<sup>14</sup> Mayor of London, *2013 Town Centre Health Check Analysis Report* (2014)

<sup>15</sup> Experian Business Strategies

- 3.85. Protecting pubs, this section highlights that despite their recognised social value, there has been a significant rate of closure. During the period 2003-2012, 900 pub sites changed to other uses and over 400 pubs were demolished.<sup>17</sup>
- 3.86. Other planning tools to provide protection to pubs are also signposted: Article 4 directions, designation as an Asset of Community Value or heritage protection.
- 3.87. Sustaining existing venues and providing new facilities, this section emphasises that London has lost 103 nightclubs and live music venues since 2007.<sup>18</sup>
- 3.88. New night-time economy uses should follow the sequential approach, focusing on sites within town centres.
- 3.89. Creating a more diverse and inclusive night-time culture and economy, this section explains that the diversification of London's night-time economy must be achieved alongside the ensuring the inclusivity of evening and night-time activities to London's diverse population.
- 3.90. As boroughs proactively manage the changing roles of town centres, especially those with surplus retail floor space through diversification and adaption, there will need to be further consideration to the management of town centre housing in relation to night-time activities.
- 3.91. Development should ensure that all Londoners, including older and disable people can participate in the range of night-time activities. As such, policies and proposals should ensure the highest standards of accessibility and inclusive design. But also through removing barriers to those who might be excluded, BAME and LGBTQ+ and those who do not drink alcohol.
- 3.92. The SPG also highlights the need for an integrated approach to managing night-time culture, this would require coordination across: planning and licensing, transport, safety and security, environmental services.

## **Mayor's Strategy documents**

### **The Mayor's Economic Development Strategy for London 2018**

- 3.93. London's dynamic economy creates a huge range of opportunities. This economic development strategy sets out how the Mayor will create a fairer, more inclusive, sustainable economy that works for all Londoners. It places emphasis on ensuring that as London's economy grows, its prosperity must be reflected in higher living

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<sup>16</sup> Ersnt & Young and London First, *The Economic Value of London's 24 Hour Economy* (2016); and NTIA, *Forward Into The Night* (2015)

<sup>17</sup> O'Connell, S., *Keeping Local: How to save London's pubs as community resources* (2013)

<sup>18</sup> Music Venues Taskforce, *Live Music Venues Audit* (2015)

standards for all Londoners. There is recognition that London has the highest inequality in the UK, which damages the economy and wellbeing of citizens.

- 3.94. The Mayor's approach is to create a fairer, more inclusive and sustainable city by creating the conditions for 'Good Growth'. The strategy sets out how this is achieved through: helping to ensure London has the workspace for businesses, the supporting transport, social and wider infrastructure, a high quality natural environment, affordable housing and the skills that the economy needs to grow sustainably and productively.
- 3.95. Section 4, Creation the conditions for growth, states that this will require the creation of an environment where entrepreneurship and innovation can flourish, where people continue to develop their skills, where London remains open to talent, and businesses can operate more efficiently.
- 3.96. A key element in creating the conditions for growth will be the provision of space for business and work. A key part of such spaces, are successful town centres and high streets. The strategy supports the adaptation of London's town centres, new forms of retail will need to emerge, supplemented by the introduction of a wider range of food and leisure, affordable workspace, housing, and civic functions.
- 3.97. The Mayor will seek to ensure the success of town centre and high streets by: promoting their inclusive and diverse role, working with boroughs and other stakeholders, supporting communities to develop an understanding of their town centres and high streets, targeting Mayoral and LEAP funds to stimulate local economic activity, preventing the loss of viable office space, working with BIDs, managing intensification, improving public transport and the public realm, encouraging healthier catering commitments, and ensuring places foster social integration.

## **Local**

### **Southwark Economic Wellbeing Strategy 2017-22: A partnership for local growth**

- 3.98. Southwark Council's Economic Wellbeing Strategy sets out the council's efforts to support local economic growth. The strategy is made up of four key pillars: Employment and skills, Business, Thriving town centres and high streets, and Financial wellbeing.
- 3.99. Thriving town centres and high streets, this section recognises that successful town centres depend on a range of components. In response to a changing retail sector, high streets should support the provision of a diverse and dynamic offer with a range of business, adaptable and affordable employment space. Planning policy and regeneration activity will play a key role in protecting and promoting employment

uses. This growth will be enabled by public and active transport connectivity, alongside digital infrastructure.

- 3.100. The section also notes the regeneration of Elephant and Castle, Canada Water and Bermondsey, Peckham Station and Peckham Square, improvements to East Street, and the Low Line. The ambitious plans set for the Old Kent road is also highlighted, in particular, the transformation from an out-of-town retail format to a high street format, supported by the delivery of the Bakerloo Line Extension and new projects delivering commercial space.

## **Area Action Plans**

### **Elephant and Castle Opportunity Area Planning Framework 2012**

- 3.101. This Opportunity Area Planning Framework sets out how the borough will support new retail development in the town centre to help consolidate Elephant and Castle and Walworth Road as a major town centre in the borough and London's wider retail hierarchy.
- 3.102. There is around 26,000m<sup>2</sup> of shopping space in the shopping centre (including 9,000m<sup>2</sup> of leisure uses). Elephant and Castle has a low proportion of shops selling comparison goods and high proportion of professional services, when compared to other UK town centres. The Elephant and Castle shopping centre reflects the growth of the Latin American community in Southwark, with a concentration of thriving Latin-American businesses. Around 38% of the retail space in the shopping centre is occupied by independent businesses.
- 3.103. The area action plan notes that the Walworth Road, with a more mixed retail offer, is disconnected from the main shopping centre.
- 3.104. The AAP was informed by Southwark's 2009 retail study which highlighted that Southwark's town centres were not meeting the needs of the borough's residents. Through increases to the borough's population and increases in disposable income, the study suggests supporting the provision of more choice, with Elephant and Castle having a capacity for 18,000m<sup>2</sup> of new comparison goods floorspace.
- 3.105. Large retail developments will have to play a role in the provision of affordable units which can be made available to independent, small and medium-sized enterprises (SME). Planning conditions or section 106 planning obligations will be used to ensure that at least 10% of new floorspace (GIA) is made available as affordable space

### **Peckham and Nunhead Area Action Plan 2014**

- 3.106. The Peckham and Nunhead AAP sets out the approach to shopping, employment and cultural uses within this key regeneration area. The approach intends to maintain and enhance Peckham's status as a major town centre and support further growth.
- 3.107. *Policy 1: Peckham town centre shopping*, encourages new retail (use classes A1/A2/A3/A4) development in Peckham town centre to help maintain and enhance its status as a major town centre in our retail hierarchy.
- 3.108. This will be achieved through the development of the following sites:
1. Aylesham Shopping Centre
  2. Copeland Industrial Park and 1-27 Bournemouth Road
  3. Land between the railway arches
  4. Peckham Rye Station
- 3.109. Peckham is currently the largest town centre in Southwark. This AAP was informed by Southwark's 2009 retail study, which states that new retail floorspace can be expanded without harming the vitality of other centres within or in neighbouring boroughs. The AAP suggested an additional retail capacity of 8,000 m<sup>2</sup>.
- 3.110. *Policy 2: Arts, culture. Leisure and entertainment*, encourages a mix of complementary arts, cultural, leisure and entertainment uses in Peckham town centre which will help contribute to supporting a lively and vibrant centre. This approach includes, supporting Peckham Square as the focus for cultural events, the continued provision of a cinema, working with business and landowners to facilitate the provision of more cafes and restaurants and proposals for new hotels.
- 3.111. The policy also supports the development of the evening and night-time economy to ensure the vitality of the town centre throughout the day and night.
- 3.112. *Policy 3: Local shops and services*, ensures the provision of shops and services to meet the needs of local residents. This includes the protection of the A1 use, through the designation of protected shopping frontages; encouraging the provision of small shops, and protecting local shops and services.
- 3.113. *Policy 4: Hot food takeaways*, encourages a healthy population and vibrant town and local centres by controlling the amount and location of hot food takeaways. This policy highlights that a proliferation of A5 uses can affect the viability and vitality of town centres. There is recognition that some evidence suggests that hot food takeaways can encourage people to eat unhealthily and this can be a particular problem with children and teenagers.

- 3.114. The pertinence of this issue is highlighted by Southwark's high rates for children of unhealthy weight, of which Peckham has some of the highest rates the borough, 19.4% of children in Peckham schools were overweight.<sup>19</sup>
- 3.115. *Policy 5: Markets*, supports the provision of new markets and street trading areas in the action area to increase the variety of retail on offer.
- 3.116. The AAP states that 'markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. They also have other benefits, such as giving more people access to fresh fruit and vegetables, supporting local producers, reducing air-freighting and creating a route to set up small businesses'.

### **Canada Water Area Action Plan 2015**

- 3.117. The Canada Water AAP sets out the strategy for improving the Canada Water Town centre, encouraging investment to provide a wider range of shops and services, and associated main town centre uses.
- 3.118. The Canada Water Town centre is set out to move up in the Borough's town centre hierarchy. This change is precipitated by the promotion of around 35,000m<sup>2</sup> (net) of new retail space in the period 2011-2026. Large retail developments will have to provide a range of shop unit sizes including small shop units suitable for independent operators.
- 3.119. To enable and accommodate this growth there will need to be improvements to transport infrastructure, including public and active transport.
- 3.120. The Southwark Retail Study 2009 demonstrated that only 16% of the expenditure available for comparison goods is spent in the borough. In part, this is as a result of the limited retail offer in shopping centres like Canada Water. For example, a survey conducted in Canada Water shopping centre showed that 36% of respondents mentioned the limited range of shops as a reason for disliking the centre.
- 3.121. The retail study suggests that the Canada Water shopping centre has the physical capacity for around 35,000 m<sup>2</sup> net of shopping floorspace, of which 30,000m<sup>2</sup> will be comparison goods floorspace. This will enable the 'claw back' of some of the expenditure currently being spent outside of the borough.
- 3.122. Large retail developments will have to play a role in the provision of affordable units which can be made available to SME and independent businesses.

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<sup>19</sup> Southwark Council, *Peckham and Nunhead Area Action Plan* (2014), p.47



3.123. This AAP also takes measures to support the delivery and maintenance of: cafes and restaurants in the town centre, important shopping parades, small scale shops, restaurants and cafes outside the town centre, and markets.

#### **Draft Old Kent Road Area Action Plan 2017**

3.124. The draft Old Kent Road Area Action Plan sets out how the area can be developed over the plan period to provide housing, jobs and the lives of people who live and work there now.

3.125. Policy AAP 7: Town centre, leisure and entertainment, states that the 'Old Kent Road will be transformed into a lively major town centre providing new shops, restaurants, cafes and local services for people to gather, shop, socialise and spend their leisure time'.

3.126. The policy intends to support the transformation of the high street into a vibrant, inclusive which provides a variety of shops and facilities to meet the needs of the local community.

3.127. Additionally, the policy intends to provide new connections to the emerging town centre and high street for the communities on either side of the road.

3.128. The policy states that development on Old Kent Road must:

1. Retain or increase the amount of A1 uses; and
2. Provide a range of shop sizes; and
3. Provide A Class uses; and
4. Provide community, leisure and cultural activities; and
5. Provide residential and office development above shops.



## 4. Research and Evidence

### Review of the role and hierarchy of centres

- 4.1. This section reviews the profiles of the existing town centres in Southwark, in particular, their roles and positions within Southwark’s town centre network. This review informs the strategy for retail which is explained in further detail in section 4 of this background paper.
- 4.2. Southwark’s existing retail provision is comprised of 208,666m<sup>2</sup> (gross) of retail sales floorspace; 44% of the existing retail provision is accommodated within food stores and convenience goods shops; the remaining 56% of existing retail provision is accommodation in comparison goods shops.<sup>20</sup>
- 4.3. Southwark’s Town and Local centres are designated in the New Southwark Plan as follows:

Designation	Town Centre
Major Town Centres	Elephant & Castle (including Walworth Road) Peckham Canada Water
District Town Centres	Bankside and The Borough London Bridge Camberwell Lordship Lane Herne Hill Old Kent Road north Old Kent Road south
Local Centres	The Blue Dulwich Village Nunhead Tower Bridge Road

- 4.4. Policy SD8 Town centre network, of the draft London Plan sets out the London wide shopping hierarchy, as set out in figure 2.17 and Annex 1.<sup>21</sup> The classification of International, Metropolitan and Major town centres can only be changed through the

<sup>20</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study* (2015), p7

<sup>21</sup> Greater London Authority, *The Draft London Plan – consolidated changes version – Clean* (2019)

London Plan. The draft London Plan suggests that Major centres generally contain over 50,000m<sup>2</sup> of retail, leisure and service floorspace.

- 4.5. Peckham Major Centre has a total retail provision of 56,630m<sup>2</sup>, this level of retail provision is in line with Major Town centre classification .
- 4.6. Elephant & Castle (including Walworth Road) Major Town Centre has a total retail provision of 44,460m<sup>2</sup>, this levels of retail provision is generally in line with Major Town centre classification, especially when accounting for 45,000 new retail floorspace with the redevelopment of the shopping centre, including an additional capacity for retail floorspace of 8,500m<sup>2</sup> (gross).<sup>22</sup> The increase in retail floorspace will be provided from the redevelopment- of Elephant and Castle Shopping Centre.
- 4.7. Canada Water Town Centre has an existing retail provision of 37,247m<sup>2</sup>,<sup>23</sup> whilst this is perhaps lower than what is expected for a Major Centre, it has been classified as such with regard to an anticipated additional retail floorspace. The Canada Water AAP and the Core Strategy both set out the potential for a net increase of around 35,000 m<sup>2</sup> of retail and leisure floorspace.<sup>24</sup> The increase in retail floorspace will be provided by the redevelopment of Surrey Quays Shopping Centre. A hybrid application has been approved seeking planning permission for Phase 1 and outline planning permission for future phases of the redevelopment of this site. The application seeks to deliver up to 88,432 m<sup>2</sup> of retail (Class A) across the Masterplan site, with a commitment to a minimum provision of 46,452m<sup>2</sup>. The maximum amount of retail would mark a significant uplift on the existing.<sup>25</sup>
- 4.8. The table below, *Existing Retail Provision in LB Southwark*, provides a summary of existing retail provision in 2014.<sup>26</sup> At the time of this study Tower Bridge Road, Old Kent Road North and Old Kent Road South were not designated as town centres. The NSP designates Elephant & Castle and Walworth Road as one major town centre.

Centre	Number Shop Units	Convenience Floorspace (m <sup>2</sup> gross)	Comparison Floorspace (m <sup>2</sup> gross)	Food and Beverage (m <sup>2</sup> gross)
Peckham Major Centre	384	22,280	27,270	7,080
Canada Water Major Centre	135	9,500	19,928	7,240
Elephant & Castle Major Centre	93	2,540	4,710	3,170

<sup>22</sup> *Southwark Retail Study*, p45

<sup>23</sup> Southwark Council, *Canada Water Masterplan Planning Committee report* (2019)

<sup>24</sup> Southwark Council, *Canada Water Area Action Plan* (2015) and Southwark Council, *Core Strategy* (2010)

<sup>25</sup> *Canada Water Masterplan Planning Committee report*

<sup>26</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study* (2015), p8

Walworth Road Major Centre	273	9,080	17,980	6,980
London Bride District Centre	94	2,080	1,520	6,590
Bankside/Borough District Centre	147	3,838	1,450	9,790
Lordship Lane District Centre	156	3,630	6,680	5,020
Camberwell District Centre	192	5,690	5,680	6,410
Herne Hill District Centre	107	1,100	3,000	2,900
The Blue Local Centre	80	2,740	1,715	1,500
Dulwich Village Local Centre	32	500	1,600	886
Nunhead Local Centre	62	1,100	2,100	867
Tower Bridge (undesigned)	63	1,080	640	1,360
Old Kent Road (undesigned)	35	11,800	19,800	2,000
Food stores outside centres	15	16,000	n/a	n/a
<b>Total</b>	<b>1,867</b>	<b>92,958</b>	<b>115,708</b>	<b>61,793</b>

4.9. The Southwark Retail Study (2015) provides details of the existing shopping provision in Southwark and also includes up to date health checks of the shopping centres, describing the vitality and viability of the borough's centres in terms of their retail performance.<sup>27</sup>

#### Peckham

4.10. Peckham town centre is the largest shopping and commercial centre in the London Borough of Southwark, in terms of number of outlets and the amount of retail floorspace. The London Plan and the New Southwark Plan identify Peckham as a *major* town centre in the town centre network.

4.11. Its key roles include convenience shopping, comparison shopping, services, entertainment and community facilities. In particular, Peckham has a large number of small independent convenience retailers located throughout the centre. The centre also accommodates a significant number of market stalls located along Rye Lane, Atwell Road, Blenheim Grove, Choumert Road and Highshore Road.

4.12. The diversity of uses present in Peckham town centre in terms of the number of units is set out in Table A.1, compared against the national average.

<sup>27</sup> Nathaniel Lichfield & Partners, *Appendix 7 Audit of Centres*, Southwark Retail Study (2015)

Type of Unit	Units 2009	Units 2013	% of Total Number of Units	
			Peckham %	UK Average <sup>(1)</sup>
Comparison Retail	123	131	34.1	36.0
Convenience Retail	82	81	21.1	8.1
A1 Services <sup>(2)</sup>	144	60	15.6	14.1
A2 Services <sup>(3)</sup>		28	7.3	12.1
A3/A5		42	10.9	14.7
A4 Pubs/bar	-	5	1.3	2.9
Vacant	34	37	9.7	12.1
<b>Total</b>	<b>383</b>	<b>384</b>	<b>100.0</b>	<b>100.0</b>

Source: 2009 GVA Retail Study and Experian Goad 2013.

(1) UK average for all town centres surveyed by Goad Plans (March 2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience goods

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015.

- 4.13. The proportion of convenience retailers located in and around the Peckham Major Town centre is significantly higher than the UK average. The vacancy rates is lower than the national average, the Southwark Retail Study 2015 suggests this is indicative of a vital and viable centre. There is also a high percentage of hot food takeaways and betting shops combined, 26%, when compared to the UK average, 19.2%.
- 4.14. Peckham town centres has variety of non-retail services uses. The centre has a very high proportion of hairdressers and beauty parlours, 37.5% compared to a UK average of 22.9%, when surveyed in 2013.
- 4.15. Significantly Peckham Town centre has a high percentage of A1 Use Class, 70.8%, and a low vacancy rate of 9.7%.

#### Elephant and Castle (excluding Walworth Road)

- 4.16. Elephant & Castle is a District Centre, with the majority of its units located within the Elephant and Castle Shopping Centre.
- 4.17. The diversity of uses present in Elephant and Castle town centre in terms of the number of units is set out in Table B.1, compared against the national average.

Type of Unit	Units 2009	Units 2013	% of Total Number of Units	
			Elephant & Castle %	UK Average <sup>(1)</sup>
Comparison Retail	32	33	35.5	36.0
Convenience Retail	11	12	12.9	8.1
A1 Services <sup>(2)</sup>	52	8	8.6	14.1
A2 Services <sup>(3)</sup>		11	11.8	12.1
A3/A5		21	22.6	14.7
A4 pubs/bar		4	4.3	2.9
Vacant	9	4	4.3	12.1
<b>Total</b>	<b>104</b>	<b>93</b>	<b>100.0</b>	<b>100.0</b>

Source: 2009 GVA Retail Study and Experian Goad 2013.

(1) UK average for all town centres surveyed by Goad Plans (March 2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.18. The proportion of A3/A5 service units is higher than the UK average. The vacancy rate of this centre is low at 4.3%, indicating a healthy, vital and viable centre.

#### Walworth Road

- 4.19. Walworth Road is designated as a District centre along with Elephant and Castle Shopping Centre. The road has a good range of convenience and comparison shopping including: a Morrisons Supermarket, two Tesco Express stores, Iceland and an M&S food hall, a range of independent stores, pubs and community facilities.
- 4.20. The diversity of uses present in Walworth Road in terms of the number of units is set out in Table C.1, compared against the national average.

Type of Unit	Units 2009	Units 2012	% of Total Number of Units	
			Walworth Road %	UK Average <sup>(1)</sup>
Comparison Retail	127	103	37.7	36.0
Convenience Retail	39	41	15.0	8.1
A1 Services <sup>(2)</sup>	121	46	16.9	14.1
A2 Services <sup>(3)</sup>		18	6.6	12.1
A3/A5		36	13.2	14.7
A4 pubs/bars		9	3.3	2.9
Vacant	16	20	7.3	12.1
<b>Total</b>	<b>303</b>	<b>273</b>	<b>100.0</b>	<b>100.0</b>

Source: 2009 GVA Retail Study and Experian Goad 2012

(1) UK average for all town centres surveyed by Goad Plans (March 2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.21. There has been a decline of 30 units since 2009 and the proportion of A1 uses is lower than the national average.

4.22. The Walworth Road has a strong selection of comparison shops, a reasonable range of service uses reflecting the size of Walworth Road and its service role in the shopping hierarchy. Nevertheless the proportion of restaurants and cafes is below the average, and the proportion of hot food takeaways is slightly above.

#### Canada Water

4.23. Canada Water is one of Southwark's three major town centres. The diversity of uses present in the centre in terms of the number of units is set out in Table D.1, compared against the national average.

Table D.1 Canada Water Use Class Mix by Unit

Type of Unit	Units 2012	% of Total Number of Units	
		Canada Water %	UK Average <sup>(1)</sup>
Comparison Retail	47	34.8	36.0
Convenience Retail	9	6.7	8.1
A1 Services <sup>(2)</sup>	21	15.6	14.1
A2 Services <sup>(3)</sup>	16	11.9	12.1
A3/A5	30	22.2	14.7
A4 pubs/bar	5	3.7	2.9
Vacant	7	5.1	12.1
<b>Total</b>	<b>135</b>	<b>100.0</b>	<b>100.0</b>

Source: Experian Goad 2012

(1) UK average for all town centres surveyed by Goad Plans (2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

4.24. The table above shows that most categories broadly reflect the national average, with A3/A5 being significantly higher. The vacancy rate is also significantly smaller than the national average, which is again indicative of town centre vitality and viability.

4.25. This centre has a good selection of comparison shops, however a low proportion of clothing and footwear stores, 17%, when compared to the national average, 25%. In the New Southwark Plan: Interim Consultation Report Responses, some respondents noted that the retail offer lacked diversity in its offer.

#### London Bridge

4.26. London Bridge is designated as a District Centre and includes CAZ frontages.

4.27. The diversity of uses present in the centre in terms of the number of units is set out in Table F.1, compared against the national average.



Type of Unit	Units 2013	% of Total Number of Units	
		London Bridge %	UK Average <sup>(1)</sup>
Comparison Retail	16	18.0	36.0
Convenience Retail	19	21.3	8.1
A1 Services <sup>(2)</sup>	4	4.5	14.1
A2 Services <sup>(3)</sup>	3	3.4	12.1
A3/A5	32	36.0	14.7
A4 pubs/bar	8	9.0	2.9
Vacant	7	7.9	12.1
<b>Total</b>	<b>89</b>	<b>100.0</b>	<b>100.0</b>

Source: Experian Goad 2013

(1) UK average for all town centres surveyed by Goad Plans (2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.28. The centre's mix of units is focused on the convenience, food and drink sector. The vacancy rate is lower than the national average.
- 4.29. The proportion of restaurants and cafes and pubs and bars is much higher than the national average. The proportion of hairdressers/beauty parlours and banks/other financial services is significantly below the national average. This is indicative of its service role in Central London.

#### Old Kent Road North and South

- 4.30. The Old Kent Road is the dominant destination for comparison shopping in the borough with a total floorspace of around 93,000 m<sup>2</sup> (GEA), including use classes A1-A5 uses, D2 leisure, hotel and wholesale space.
- 4.31. This includes around 10,000 m<sup>2</sup> of vacant floorspace (11%), which is comparable to the national average. However, along some designated protected shopping frontages along the Old Kent Road, the vacancy rate is as high as 29%.
- 4.32. Based on Valuation Office/Completely Retail data, the total occupied Class A1 to A5 floorspace at OKR totals about 64,500 m<sup>2</sup> GIA split:
1. Class A1 retail, 45,300 m<sup>2</sup> (GIA)
  2. Class A1 service/A2, 6,500 m<sup>2</sup> (GIA)
  3. Class A3 to A5 = 10,000 m<sup>2</sup> (GIA)

#### Bankside and the Borough

- 4.33. Bankside and the Borough is designated a District Centre and is designated CAZ frontage in the London Plan.
- 4.34. The diversity of uses present in the centre in terms of the number of units is set out in Table E.1, compared against the national average.

Type of Unit	Units 2013	% of Total Number of Units	
		Borough/Bankside	UK Average <sup>(1)</sup>
Comparison Retail	16	10.9	36.0
Convenience Retail	25	17.0	8.1
A1 Services <sup>(2)</sup>	7	4.8	14.1
A2 Services <sup>(3)</sup>	21	14.3	12.1
A3/A5	46	31.3	14.7
A4 pubs/bar	25	17.0	2.9
Vacant	7	4.8	12.1
<b>Total</b>	<b>147</b>	<b>100.0</b>	<b>100.0</b>

Source: Experian Goad 2013

(1) UK average for all town centres surveyed by Goad Plans (2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.35. This centre has a high proportion of units in the convenience retail and food and drink sectors. The Southwark Retail Study 2015 suggests this reflects its role as a CAZ frontage, which serves as a Central London service centre. The centre has a low proportion of comparison retail and a low vacancy rate. The proportion of restaurants and cafes and pubs and bars is far higher than the UK average.

#### Lordship Lane

- 4.36. Lordship Lanes is designated as a District Centre in the New Southwark Plan, it has a role primarily serving local residents.
- 4.37. The diversity of uses present in the centre in terms of the number of units is set out in Table G.1, compared against the national average.

Type of Unit	Units 2009	Units 2013	% of Total Number of Units	
			Lordship Lane %	UK Average <sup>(1)</sup>
Comparison Retail	48	51	32.7	36.0
Convenience Retail	19	24	15.4	8.1
A1 Services <sup>(2)</sup>	90	13	8.3	14.1
A2 Services <sup>(3)</sup>		18	11.5	12.1
A3/A5		33	21.2	14.7
A4 pubs/bar		8	5.1	2.9
Vacant		13	9	5.8
<b>Total</b>	<b>170</b>	<b>156</b>	<b>100.0</b>	<b>100.0</b>

Source: 2009 GVA Retail Study and Experian Goad 2013

(1) UK average for all town centres surveyed by Goad Plans (March 2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.38. This centre has a higher proportion of convenience retail to the national average, but with a mix of units generally similar to the national average. This centre has a low vacancy rate.

- 4.39. The centre is mainly comprised of independent retailers with a small selection of national multiple retailers. The proportion of restaurants and cafes is higher than the national average.
- 4.40. The New Southwark Plan: Interim Consultation Report Responses highlighted that respondents were satisfied with the variety of retail uses, independent ownership of businesses and high quality urban design and heritage.

#### Camberwell

- 4.41. Camberwell is designated as a District Centre in the New Southwark Plan. The retail centre is comprised of a mix of building styles, ranging from traditional terrace period building typical of a London High Street to more modern infill development
- 4.42. The diversity of uses present in the centre in terms of the number of units is set out in Table H.1, compared against the national average.

Type of Unit	Units 2013	% of Total Number of Units	
		Camberwell %	UK Average <sup>(1)</sup>
Comparison Retail	45	23.4	36.0
Convenience Retail	22	11.5	8.1
A1 Services <sup>(2)</sup>	38	19.8	14.1
A2 Services <sup>(3)</sup>	22	11.5	12.1
A3/A5	43	22.4	14.7
A4 pubs/bar	7	3.6	2.9
Vacant	15	7.8	12.1
<b>Total</b>	<b>192</b>	<b>100.0</b>	<b>100.0</b>

Source: Experian Goad 2013

(1) UK average for all town centres surveyed by Goad Plans (2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.43. The proportion of comparison retail, 23.4%, is significantly below the UK average, 36%. The proportion of convenience, 11.5%, and food and drink uses, 26%, are well above the national average, 17.6%. The proportion of restaurants and cafes is higher than the national average, as is the number of hairdressers/beauty parlours and laundries/dry cleaner.
- 4.44. Camberwell has a low vacancy rate, 7.8%, much like the other centres in Southwark.

#### Herne Hill

- 4.45. Herne Hill district centre is situated between Southwark and Lambeth, the main concentration of retail units are located on Half Moon Lane in Southwark, although

there are a number of commercial units by the railway station and on Railton Road, within Lambeth.

- 4.46. The diversity of uses present in the centre in terms of the number of units is set out in Table I.1, compared against the national average.

Type of Unit	Units 2012	% of Total Number of Units	
		Herne Hill %	UK Average <sup>(1)</sup>
Comparison Retail	34	31.8	36.0
Convenience Retail	14	13.1	8.1
A1 Services <sup>(2)</sup>	14	13.1	14.1
A2 Services <sup>(3)</sup>	8	7.5	12.1
A3/A5	23	21.5	14.7
A4 pubs/bar	6	5.6	2.9
Vacant	8	7.5	12.1
<b>Total</b>	<b>107</b>	<b>100.0</b>	<b>100.0</b>

Source: NLP, 2012

(1) UK average for all town centres surveyed by Goad Plans (March 2014)

(2) incl. hairdressers, travel agents and other Class A1 uses not selling comparison/convenience good

(3) Class A2 includes betting shops and pay day loan shops – reclassified as Sui Generis from April 2015

- 4.47. Herne Hill District Centre has a relatively small selection of comparison shops. Most businesses are small independents, with a small selection of multiple retailers like Londis and Oxfam present. The centre also has a successful street market.
- 4.48. The proportion of restaurants and cafes, 51.1%, is much higher than the national average, 23.3%, as is the number of hairdressers/beauty parlours, laundries/dry cleaners and estate agents.
- 4.49. Much like most centres in Southwark, Herne Hill centre's vacancy rate is lower than the UK average.

#### The Local Centres

- 4.50. The Blue forms a linear high street with a 'market place' at the centre. The centre has a limited number of multiple retailers and mainly fulfils a local shopping role. The vacancy of this rate of this centre, 11.3%, is broadly the same as the UK average, 12.1%. Respondents to the NSP: Interim consultation report noted that there were too many pawnbrokers and similar uses as well as takeaways.
- 4.51. Dulwich Village Local Centre is situated in the south of the borough. The centre has a limited number of multiple retailers and mainly fulfils a local shopping role, with the majority of businesses as small independents. The vacancy rate of this centre is significantly below the national average at 3.1% against 12.1%.

- 4.52. Nunhead Local Centre is made up of two sections, running along Evelina Road from the railway line south to Nunhead Green. The centre has a limited number of multiple retailers and mainly fulfils a local shopping role. Significantly, the vacancy rate of this centre is double the national average at 24.2% of 12.1%. The retail study suggests this indicates that this centre is struggling to attract new retailers. The proportion of fast food takeaways, 39.1%, is much higher than the UKI average, 15.2%.
- 4.53. Tower Bridge Road is designated as a Local Centre in the New Southwark Plan. The proportion of comparison retail is significantly below the national average figure. This reflects its role as a centre serving a local population. The proportion of convenience, food and drink and A1 service uses are above the UK average.

#### Other shopping parades

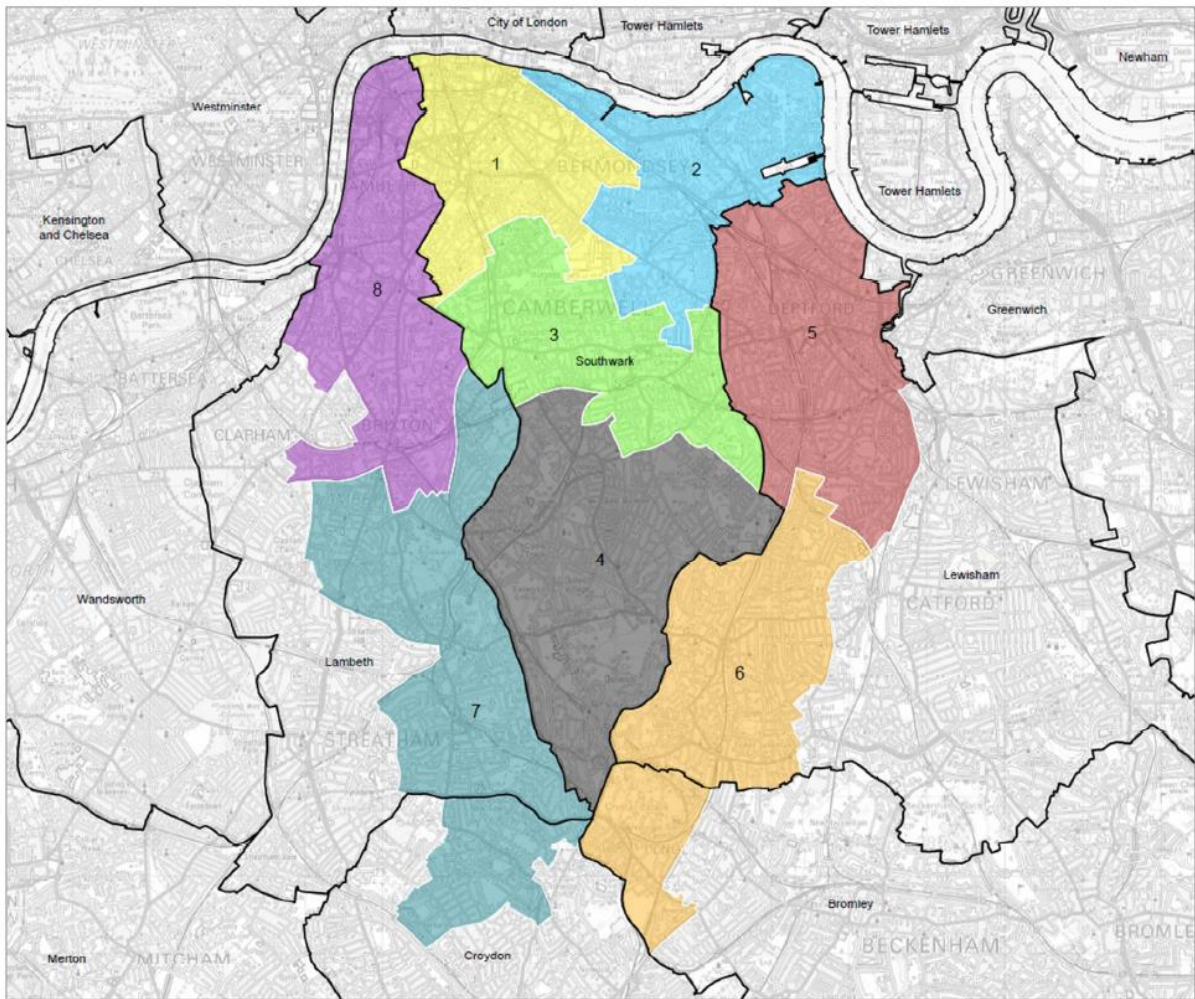
- 4.54. Outside the local centres, there are a number of shopping frontages which contain a mix of convenience retail and other A use classes, including some community D use class.
- 4.55. These parades provide pedestrian accessible facilities for a local catchment, and many are designated as protected shopping frontages in the New Southwark Plan. See Appendix 1 and Appendix 2.

#### Out of Centre Provision

- 4.56. There are 15 food stores outside town centres, with a combined convenience floorspace of 16,000 m<sup>2</sup> (gross).

#### **Comparison and Convenience Goods Expenditure**

- 4.57. *The Southwark Retail Study Old Kent Road Update (2018)* forecasts growth in population and per capita spending the quantitative scope for new retail floorspace in Southwark from 2014 to 2031. The forecast of growth in comparison and convenience goods spending is based on a defined area of study.



4.58. As a consequence of growth in population and per capita spending, within the study area:

1. Convenience goods expenditure is forecast to increase by 21.8%, from £1,296 million in 2014 to £1,533 million in 2031.<sup>28</sup>
2. Comparison goods expenditure is forecast to increase by 90.7%, from £1,632 million in 2014 to £3,139 million in 2031.<sup>29</sup>

#### Convenience Shopping

4.59. *The Southwark Retail Study Old Kent Road Update (2018)* provides estimates of markets share or penetration within each study area zone.<sup>30</sup> Within the borough (Zones 1-4), retention is above 80%; adjoining the borough (Zones 5-8), the

<sup>28</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study Old Kent Road Update (2018)*, p5

<sup>29</sup> Ibid.

<sup>30</sup> Ibid., Appendix 2 Table 4: Base Year Convenience Goods Market Shares (%)

proportion of convenience goods expenditure within each zone that is spent within Southwark ranges from 37%-9%.<sup>31</sup>

- 4.60. Accordingly, it is estimated that the convenience goods expenditure leakage from the borough is around £77 million in 2014.<sup>32</sup>
- 4.61. The study states that the level of convenience foods expenditure retained within the borough is relatively high, with limited scope to increase the borough's retention of convenience goods expenditure.
- 4.62. The level of convenience goods expenditure attracted to shops/stores in Southwark in 2014 is estimated to be £690.08 million.<sup>33</sup> It is concluded that this figure suggests that convenience retail sales floorspace in the borough is trading healthy.

#### Comparison Shopping

- 4.63. *The Southwark Retail Study Old Kent Road Update (2018)* provides estimates of markets share or penetration within each study area zone.<sup>34</sup> Within the borough (Zones 1-4), retention ranges from 61%-38%.<sup>35</sup> The study suggests that the retention rates for comparison shopping are reasonable. The borough's market share within the core zones (Zones 1-4) is 50.4%, which is not unusual when acknowledging the proximity of central London shopping facilities.
- 4.64. The estimated comparison goods expenditure currently attracted by shopping facilities within Southwark is £531.10 million in 2014.<sup>36</sup> The study highlights that the retention of comparison goods expenditure within the borough is lower than for convenience goods, as residents will generally travel further to the larger shopping centres in Central London, Bromley and Croydon.

#### Floorspace capacity for additional retail development

- 4.65. The Southwark Retail Study Old Kent Road Update (2018) assesses the quantitative scope for new retail floorspace in Southwark from 2014 to 2031. The methodology adopted for this analysis is set out in detail in Appendix 1 of Southwark Retail Study (2015).<sup>37</sup>
- 4.66. The quantitative analysis for additional retail floorspace capacity is based on the defined area of study.

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<sup>31</sup> Ibid.

<sup>32</sup> Ibid., Appendix 2 Table 5 Base Year 2014 Convenience Goods Expenditure (£m)

<sup>33</sup> Ibid.

<sup>34</sup> Ibid., Appendix 3 Table 4: Base Year Comparison Goods Market Shares (%)

<sup>35</sup> Ibid.

<sup>36</sup> Ibid., Appendix 3 Table 5 Base year 201 Comparison Goods Expenditure (£m)

<sup>37</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study (2015)*, Appendix 1 Study Area and Methodology

## Quantitative Capacity for Convenience Floorspace

- 4.67. The Southwark Retail Study Old Kent Road update (2018) estimates an increase in convenience goods expenditure from £690.08 million<sup>38</sup> in 2014 to £848.65 million by 2031.<sup>39</sup>
- 4.68. Longer term growth will create an expenditure surplus of £23.45 million by 2031.<sup>40</sup> Long term expenditure surplus could support an additional 1,954m<sup>2</sup> net (2,791m<sup>2</sup> gross) of convenience sales floorspace.<sup>41</sup>
- 4.69. The breakdown of convenience floorspace requirements is shown in the table below.

	2014	2021	2026	2031
<b>Turnover Density New Floorspace (£ per sq.m)</b>	£12,000	£12,000	£12,000	£12,000
<b>Floorspace Requirement (sq.m net)</b>				
Zone 1 - Southwark North West	0	-2,514	-1,358	-719
Zone 2 - Southwark North East	0	-2,147	189	2,261
Zone 3 - Southwark Central	0	-312	148	540
Zone 4 - Southwark South	0	-318	-233	-129
<b>Total</b>	<b>0</b>	<b>-5,291</b>	<b>-1,253</b>	<b>1,954</b>
<b>Floorspace Requirement (sq.m gross)</b>				
Zone 1 - Southwark North West	0	-3,591	-1,939	-1,027
Zone 2 - Southwark North East	0	-3,067	271	3,231
Zone 3 - Southwark Central	0	-445	212	771
Zone 4 - Southwark South	0	-455	-332	-184
<b>Total</b>	<b>0</b>	<b>-7,559</b>	<b>-1,790</b>	<b>2,791</b>

## Quantitative Capacity for Comparison Floorspace

- 4.70. The Southwark Retail Study Old Kent Road update (2018) estimates an increase in comparison goods expenditure from £530.1 million in 2014,<sup>42</sup> to £1,065.65 million in 2031.<sup>43</sup>
- 4.71. Longer term growth will create an expenditure surplus of £237.17 million by 2031.<sup>44</sup> Long term surplus expenditure in 2031 could support an additional 33,875m<sup>2</sup> net (45,166m<sup>2</sup> gross) by 2031 of comparison floorspace. These floorspace projections however do not take into account the emerging development proposals at Canada Water and the Aylesham Centre in Peckham. Revised growth projects incorporating

<sup>38</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study Old Kent Road Update (2018)*, Appendix 2, Table 5

<sup>39</sup> Ibid., p.5

<sup>40</sup> Ibid.

<sup>41</sup> Ibid. p.6

<sup>42</sup> Ibid., Appendix 3, Table 5

<sup>43</sup> Ibid., Appendix 3, Table 8

<sup>44</sup> Ibid.



commitments and these two proposals suggest, longer term growth can support 16,303m<sup>2</sup> net (21,739m<sup>2</sup> gross) of comparison floorspace.<sup>45</sup>

4.72. The breakdown of comparison floorspace requirements is shown in the table below.

	2014	2021	2026	2031
Turnover Density New Floorspace (£ per sq.m)	£5,000	£5,743	£6,341	£7,001
<b>Floorspace Requirement (sq.m net)</b>				
Zone 1 - Southwark North West	n/a	399	2,019	5,274
Zone 2 - Southwark North East	n/a	1,150	-2,719	7,898
Zone 3 - Southwark Central	n/a	622	-696	1,238
Zone 4 - Southwark South	n/a	353	875	1,894
<b>Total</b>	<b>n/a</b>	<b>2,523</b>	<b>-520</b>	<b>16,305</b>
<b>Floorspace Requirement (sq.m gross)</b>				
Zone 1 - Southwark North West	n/a	532	2,693	7,032
Zone 2 - Southwark North East	n/a	1,533	-3,625	10,531
Zone 3 - Southwark Central	n/a	829	-928	1,651
Zone 4 - Southwark South	n/a	470	1,167	2,525
<b>Total</b>	<b>n/a</b>	<b>3,364</b>	<b>-694</b>	<b>21,739</b>

#### Quantitative Capacity for Food/Beverage Floorspace

4.73. The Southwark Retail Study Old Kent Road update (2018) estimates an increase in food and beverage (use classes A3/A4/A5) expenditure from from £950.18 million in 2014 to £1,441.24 million in 2031.<sup>46</sup>

4.74. Longer term growth will generate create an expenditure surplus of £100.93 million in 2031.<sup>47</sup> The long term expenditure growth could support 8,415 m<sup>2</sup> gross by 2031, over and above completions/commitments and two proposals (Canada Water and Aylesham Shopping Centre).<sup>48</sup>

#### Old Kent Road Quantitative capacity

4.75. The floorspace projections in the Southwark Retail Study Old Kent Road update (over and above commitments and proposals) suggest that A1-A5 use class floorspace can be increased from 64,500 m<sup>2</sup> gross to 90,000 m<sup>2</sup> gross, 2018-2031.<sup>49</sup>

4.76. The study provides an indicative mix of A1-A5 uses within the Old Kent Road, including retained floorspaces:

1. Class A1 convenience goods retail =15,000 m<sup>2</sup> gross
2. Class A1 comparison goods retail =50,000 m<sup>2</sup> gross
3. Class A1 service/A2 =10,000 m<sup>2</sup> gross

<sup>45</sup> Ibid., Appendix 3, Table 21

<sup>46</sup> Ibid., p.8

<sup>47</sup> Ibid.

<sup>48</sup> Ibid., p.9

<sup>49</sup> Ibid., p.25

4. Class A3-A5 food and beverage =15,000 m<sup>2</sup> gross

## **Markets**

- 4.77. The Council is preparing a new Markets Strategy. The strategy will set out how developing street markets and street trading will contribute to ensuring the continued vitality and viability of Southwark's town centres.
- 4.78. There are a number of Southwark Council and privately operated markets in the borough, a significant number of these markets are located within designated town centre boundaries.
- 4.79. Southwark operated markets:
1. East Street market
  2. North Cross Road
  3. Southwark Park Road (The Blue)
  4. Choumert Road, Peckham
  5. Dal Porter Square (Canada Water)
  6. Peckham Sqaure
  7. Camberwell Green
  8. London Bridge
- 4.80. Privately operated markets licenced by Southwark markets
1. Bermondsey Antiques Market
  2. Maltby Street
  3. Tabard Street (Borough High Street)
  4. Peckham Levels
- 4.81. The draft strategy will highlight the economic, cultural and social benefits of street markets and street trading, in particular: providing access to high quality affordable food and other goods, significant economic and employment benefits, promoting and sustaining small and independent businesses, and contributing to a vibrant public realm.

## 5. The Options

5.1. Throughout the New Southwark Plan preparation, the most appropriate approach to improve Southwark's town and local centres has been considered. Including which planning measures were needed to maintain and encourage the main town centre uses, and manage the proliferation of hot food takeaways, betting shops and payday loan shops.

Policy	NSP Options	NSP Preferred Option	NSP Proposed Submission Version	NSP Amended Policies	NSP Submission
<b>P31: Small shops</b>	<p>DM26: Local shopping parades and small shops</p> <p>Recognises the importance of local shops in neighbourhoods; ensures the provision of a range of shops to meet the needs of the local community.</p> <p>This is achieved through managing the change of use from A class uses to other uses outside town and local centres and protected shopping frontages.</p> <p>DM25: Town centres and important shopping parades,</p>	No policy.	<p>Specific policy introduced.</p> <p>Small shops should be retained.</p> <p>Small shops at risk of displacement from a development need full consideration of the feasibility of providing affordable and suitable space for the existing occupiers in the new development.</p> <p>Developments proposing 2,500 m<sup>2</sup> GIA or more of retail space shall provide at least 10% of this space as small shops.</p>	No proposed changes.	<p>No material changes.</p> <p>Definition of small shop included in fact box.</p>

	aims to promote and protect small, independent and affordable shops.				
<b>P34: Town and Local Centres</b>	<p>DM25: Town centres and important shopping parades</p> <p>This policy seeks to maintain Southwark's network of town and local centres and shopping frontages.</p> <p>The policy supports a 'town centres first approach' to new development for retail and leisure uses.</p>	<p>DM27: Town and local centres</p> <p>The updated policy outlines the town centre hierarchy.</p> <p>A use classes are to be retained or replaced by an alternative use that provides a service to the general public and would not harm the vitality and viability of the centre.</p> <p>1000m<sup>2</sup> threshold for the provision of public toilets, seating and drinking fountains.</p>	No material changes.	No proposed changes.	Town centre hierarchy is amended to remove Old Kent Road as a Major Town Centre, and introduction of two new District Town Centres, Old Kent road north and Old Kent road south.
<b>P35: Development outside town centres</b>	<p>DM26: Local shopping parades and small shops</p> <p>Recognises the importance of local shops in neighbourhoods;</p>	<p>DM28: Development outside town centres</p> <p>Specific policy introduced.</p> <p>Developments outside town and</p>	No material changes.	No proposed changes.	No material changes.

	<p>ensures the provision of a range of shops to meet the needs of the local community.</p> <p>This is achieved through managing the change of use from A class uses to other uses outside town and local centres and protected shopping frontages.</p>	<p>local centres must comply with the sequential test.</p> <p>The policy introduces the threshold of 1,000m<sup>2</sup>, of which developments need to provide an impact assessment if outside town centres.</p>			
<b>P36: Protected shopping frontages</b>	<p>Policy DM25: Town centres and important shopping parades</p> <p>This policy seeks to maintain Southwark's network of town and local centres and shopping frontages.</p> <p>The policy supports a 'town centres first approach' to new development for retail and leisure uses.</p>	<p>DM29: Protected shopping frontages</p> <p>Specific policy for protected shopping frontages introduced.</p> <p>The proportion of A1 Use Class in protected shopping frontages must not fall below the percentages specified in the policy table.</p> <p>18 month marketing required for a change of use from A1.</p>	Two year marketing requirement.	No proposed changes.	Peckham threshold of A1 Use class which should be retained is revised to 75%.
<b>P37 Shops outside protected shopping</b>	DM26: Local shopping parades	DM30: Shops outside protected shopping	Two year marketing requirement.	No proposed changes.	No material changes.

<p><b>frontages, town and local centres</b></p>	<p>and small shops</p> <p>Recognises the importance of local shops in neighbourhoods; ensures the provision of a range of shops to meet the needs of the local community.</p> <p>This is achieved through managing the change of use from A class uses to other uses outside town and local centres and protected shopping frontages.</p>	<p>frontages, town and local centres</p> <p>18 month marketing required for a change of use from A Use Class.</p> <p>Demonstration there is an alternative A Use class shop within a 400m walking distance.</p>			
<p><b>P38: Shop fronts</b></p>	<p>DM47: Shop fronts</p> <p>The policy encourages the retention of historic shop fronts and the provision of high quality new shop fronts.</p>	<p>DM31: Shop fronts</p> <p>Removal of 'The use of external mounted shutter housings and solid roller shutters is not supported'.</p>	<p>No material changes</p> <p>Utilise internal security grilles and security solutions included</p>	<p>No proposed changes.</p>	<p>No material changes</p>
<p><b>P39: Betting shops, pawnbrokers and pay day loan shops</b></p>	<p>DM29: Betting shops, pay day loan shops and pawnbrokers</p> <p>The policy ensures a</p>	<p>DM32: Betting shops, pawnbrokers and pay day loan shops</p> <p>No material changes.</p>	<p>No material changes.</p>	<p>No proposed changes.</p>	<p>No material changes. The policy amended to apply to the whole borough, instead of just within protected</p>

	<p>balanced mix of town centre uses by restricting the amount and location of betting shops, pay day loan shops and pawnbrokers in all shopping frontages.</p> <p>These achieved by limiting the percentage of these uses to no more than 5% of a protected shopping frontage and not within 10 units of another shops of the same use.</p>				<p>shopping frontages.</p> <p>Expanded reasons.</p>
<b>P41: Pubs</b>	<p>DM27: Pubs</p> <p>This policy recognises that the number of pubs has been declining across London.</p> <p>The policy states that development must not result in the loss of a pub. The change of use will be acceptable if the pub has been vacant and</p>	<p>DM34: Pubs</p> <p>Removal of 18 month marketing clause</p> <p>Registration of a pub as an Asset of Community Value will be treated as a significant material consideration.</p>	No material changes.	No proposed changes.	<p>No material changes.</p> <p>Acknowledgment of night-time economy and expanded reasons.</p>

	marketed for at least 18 months, or is no longer financially viable.				
<b>P47: Hot food takeaways</b>	<p>DM28: Hot food takeaways The policy aims to support a healthy population and a balanced mix of town centre uses by restricting the amount and location of hot food takeaways (Class A5).</p> <p>These achieved by limiting the percentage of these uses to no more than 5% of a protected shopping frontage and not within 10 units of another shops of the same use.</p>	<p>DM41: Hot food takeaways</p> <p>No material changes.</p>	No changes.	No proposed changes.	<p>The policy amended to apply to the whole borough, instead of just within protected shopping frontages.</p> <p>Expanded reasons.</p> <p>Kitchen extraction requirements included.</p>



## 6. The Strategy

- 6.1. Our strategy is to improve the retail offer in our existing centres and to encourage all new major development for shopping and leisure uses to be located in the town centres as set out in the retail hierarchy.
- 6.2. Southwark's existing retail provision is comprised of 208,666m<sup>2</sup> (gross) of retail sales floorspace; 44% of the existing retail provision is accommodated within food stores and convenience goods shops; the remaining 56% of existing retail provision is accommodation in comparison goods shops.
- 6.3. The retail floorspace projections for Southwark were updated in the Southwark Retail Study Old Kent Road update (2018) which identifies that surplus expenditure in 2031 (over and above commitments and proposals) could support an additional 16,303m<sup>2</sup> net (21,739m<sup>2</sup> gross) of comparison floorspace<sup>50</sup> and 1,954m<sup>2</sup> net (2,791m<sup>2</sup> gross) of convenience sales floorspace.<sup>51</sup>
- 6.4. The strategy will seek to support an increase in the comparison and convenience goods floorspace throughout the borough and particularly within the Elephant and Castle, Canada Water, Peckham and the Old Kent Road town centres. To help achieve our floorspace projection this plan anticipates the redevelopment of our key shopping centres in the three Major Town Centres, Elephant and Castle Shopping Centre, Surrey Quays Shopping Centre and the Aylesham Centre.
- 6.5. Elephant and Castle and Canada Water have the greatest capacity for new development and will be the focus to support growth. Peckham has some scope to provide a limited amount of retail development and sites will be allocated through the Peckham AAP and NSP site allocations.
- 6.6. Data from the London Development Database (LDD) highlights that between the financial years of 2011 and 2018 there has been a net gain through approvals of 35,518 m<sup>2</sup> of A1 use class space, and a net gain of 28,402 m<sup>2</sup> of completions. (See Appendix 5 for breakdown by year of approvals and completions).
- 6.7. The completion of applications delivering over 1,000 m<sup>2</sup> net (and gross) of A1 floorspace has contributed significantly to meeting the demand of retail floorspace in the borough. However, the majority of net gain in A1 floorspace is delivered through development proposing less than 1,000 m<sup>2</sup> of net floorspace. Completions data show that across the period, 11,825 m<sup>2</sup> net of A1 floorspace was delivered through applications proposing over 1000 m<sup>2</sup> of A1 floorspace, whilst 16,577 m<sup>2</sup> net was delivered through applications proposing less than 1000 m<sup>2</sup> of A1 floorspace.

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<sup>50</sup> Ibid., Appendix 3, Table 21

<sup>51</sup> Ibid. p.6

- 6.8. The ability of the town centres to accommodate the scale of assessed capacity for additional retail floorspace is highlighted in the site allocations methodology paper which identifies a town centres uses (A1, A2, A3, A4, D1, D2) capacity of 133,022m<sup>2</sup> in designated town centres.
- 6.9. The Retail study conducted a town centre audit, providing an analysis of the main town centres throughout the borough. In particular, to inform the designation of Southwark's town centre network and protected shopping frontages.
- 6.10. This policy defines Southwark's town centre network and hierarchy in accordance with the NPPF. The policy reflects the draft London Plan's Town Centre Network, of which Elephant and Castle, Peckham and Canada Water are designated as Major Town Centres. This policy also introduces Old Kent Road north and Old Kent Road south as two new District Town Centres, a reflection of the growth in commercial space anticipated in this Opportunity Area.
- 6.11. As a result of the scale of development proposed in the Old Kent Road Opportunity Area and the proposed transition to a high street format, the nature of the retail offer is likely to change in future, including the designation of two new district town centres, Old Kent Road North and Old Kent Road South, which have the potential to be re-designated as Major Town Centres.
- 6.12. The continued vitality and viability of Southwark's centres and shopping parades depends, in part, on the range and critical mass of retail services on offer being maintained.
- 6.13. The town centre first approach acknowledges that comparison retail is the core driver of growth within many of Southwark's town centres, and accordingly prioritises the protection of the core retail function, A1 use, whilst also supporting the retention and uplift of A2, A3 and A4 use classes where there is an identified capacity. Nevertheless, the diversification of town centres is supported where appropriate, in response to changing consumer behaviours and online shopping/multi-channel retailing.
- 6.14. The strategy continues to support main town centre uses to ensure town centre viability and vitality, through the provision of a diverse range of shop units, key social infrastructure, employment opportunities, leisure, arts and cultural uses, a thriving night-time economy and affordable space for small and independent businesses.
- 6.15. The strategy sets out how Southwark will manage the concentration of uses which harm the amenity of the local community and harm the vitality and viability of town centres and health outcomes of Southwark residents, in particular betting shops, pawnbrokers, pay day loan shops and hot food takeaways.

### **P31: Small shops**

- 6.16. Policy P31 aims to ensure town centre viability and vitality, through the provision of a diverse range of shop units, key social infrastructure, employment opportunities, and affordable space for small and independent businesses.
- 6.17. ***Justification***
- 6.18. The NPPF 2019 states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaption.
- 6.19. It has been evidenced that small shops play a crucial role ensuring the vitality and viability of our town centres, namely through meeting the anticipated needs for a diverse retail offer, supporting social infrastructure and providing affordable commercial space.
- 6.20. The Mayor of London's High Streets for All report recognises the important role of small shops and businesses in the provision of crucial social infrastructure and social services for London. The study states that shops often go beyond their primary commercial role and perform a social function, with 40% of small businesses interviewed for the study providing some form of social function.<sup>52</sup>
- 6.21. The social function of shops often supports marginalised people and under-represented groups, for example, older people, job-seekers, young people and recent immigrants.
- 6.22. High streets are largely comprised of small businesses on leasehold arrangements; typical high street spatial configurations comprise of multiple small units under separate ownership, further complemented by a range of various spaces for work. This research concludes that this configuration supports the diversity (of which small shops play a crucial role) and ultimately the resilience on the high street.
- 6.23. Accordingly, high streets with small units (amongst others) provide a variety of employment opportunities, often supporting the employment of marginalised groups and highly educated people alike. The high street often has the ability to offer diverse tenure options to traders, and simultaneously create employment opportunities, often keeping money within the local economy.
- 6.24. Small shops provide a crucial role ensuring social inclusion, affordability, economic resilience, diversity of choice and character; however they are facing a series of pressures which support the need for policy intervention. This is supported by the

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<sup>52</sup> LSE Cities and We Made That, *High Streets for All*, Greater London Authority (2017)

High Streets for All report that in the areas surveyed the most important issue to Londoners on London's high streets is the choice and range of offer.<sup>53</sup>

- 6.25. The GLA's London Small Shops Study 2010 illustrates how small shops contribute to the local character and identity of an area. In many of London's and Southwark's high streets, small shops play an important role in establishing a character and providing the framework for particular economic activity.<sup>54</sup> For example, the Rye Lane Conservation Area Appraisal states that 'the commercial character of Rye Lane is expressed through a wide variety of premises'.<sup>55</sup>
- 6.26. The High Streets for All report highlights that small businesses find rent unaffordable in high streets and town centres.<sup>56</sup> As a centre becomes more successful and rents rise, small and independent businesses and small shops are priced out.<sup>57</sup>
- 6.27. The London Town Centre Health Check shows that average retail rents across all centres grew by 3% per annum between the period 2005 and 2016. Notably, Peckham Town Centre is listed as one of the top 20 centres with highest growth in retail rents over the same period.<sup>58</sup>
- 6.28. The GLA London Small Study 2010 illustrates that there has been a decline in the number of local shops; referencing the British Council of Shopping Centres, "the number of businesses registered for VAT in the wholesale, retail and repair category has fallen from 434,000 in 1994 to 390,000 in 2005".<sup>59</sup> Furthermore, the study highlights that there has been a long term trend towards large stores in centres, which is having a negative impact on small shops; this is supplemented with the rise of major superstore operators' opening small food store formats.<sup>60</sup>
- 6.29. The rationale for this policy is to ensure the vitality and viability of town centres in Southwark by preventing the loss of small shops in the borough. P31: Small shops intends to ensure that small shops are retained except where it can be demonstrate that there is no demand for continued use.
- 6.30. To ensure the availability of small shops and affordable commercial space the policy requires developments over 2,500 m<sup>2</sup> GIA or more of retail space to provide at least 10% of this space as small shops.
- 6.31. The threshold of 2,500 m<sup>2</sup> is in accordance with the approach defined in the NPPF of which impact assessments are required for retail and leisure developments.

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<sup>53</sup> Ibid.

<sup>54</sup> Roger, Tym & Partners, Greater London Authority, *The London Small Shops Study* (2010)

<sup>55</sup> Southwark Council, *Rye Lane Peckham Conservation Area Appraisal* (2011)

<sup>56</sup> *High Streets For All*

<sup>57</sup> *The London Small Shops Study*

<sup>58</sup> Mayor of London, *2017 London Town Centre Health Check* (2018) p.71

<sup>59</sup> British Council of Shopping Centres, *Shopping Places for People* (2007)

<sup>60</sup> *Southwark Retail Study* (2015), p.15

- 6.32. The policy defines a small shop as having 80m<sup>2</sup> gross floorspace or less, this in accordance with the London Small Shops Study suggested definition.<sup>61</sup>
- 6.33. **Conformity with the London Plan**
- 6.34. The threshold set is also in conformity with the approach in the draft New London Plan, Policy E9 Retail, markets and hot food takeaways, states that ‘particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 m<sup>2</sup> gross A Class floorspace) can make to the provision of small shops and other commercial units’.
- 6.35. The Town Centres Supplementary Planning Guidance, also states that boroughs are encouraged to set appropriate local policies for their centres, to clarify the definition of small shops in terms of floorspace and the large development threshold

**P34: Town and local centres (and P35: Development outside town centres)**

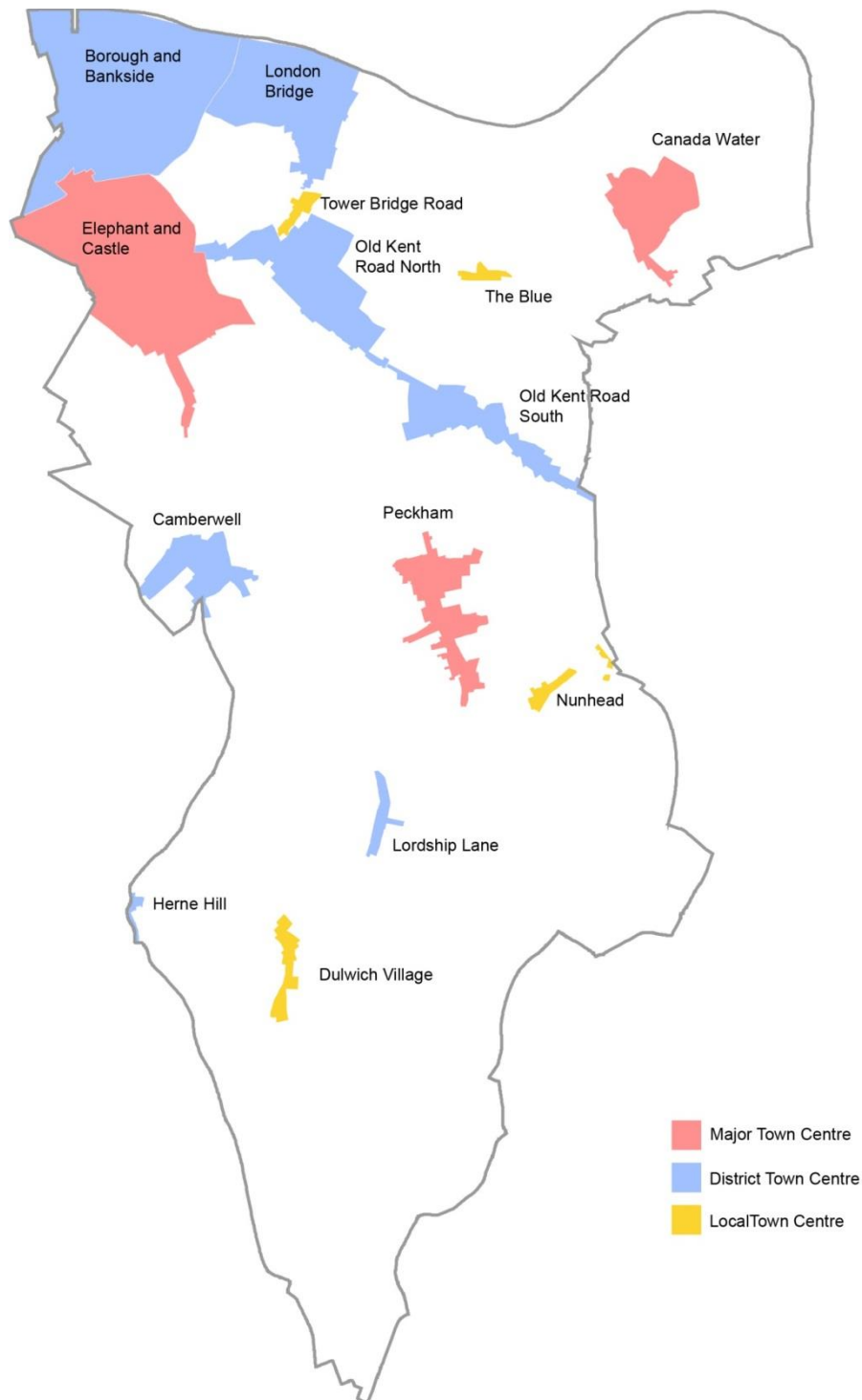
- 6.36. This policy seeks to ensure that town and local centres are the main focus for new developments providing the main town centres uses “retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).”<sup>62</sup>
- 6.37. This policy alongside P35: Development outside town centre applies the sequential test approach to town centre development in line with the NPPF and draft New London Plan policies.
- 6.38. “Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out-of-centre sites be considered.”
- 6.39. This policy defines Southwark’s town centre network and hierarchy in accordance with the NPPF. The policy reflects the draft London Plan’s Town Centre Network, of which Elephant and Castle, Peckham and Canada Water are designated as Major Town Centres. This policy also introduces Old Kent Road north and Old Kent Road

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<sup>61</sup> *The London Small Shops Study*, p.8

<sup>62</sup> NPPF 2019

south as two new District Town Centres, a reflection of the growth in commercial space anticipated in this Opportunity Area.



6.40. The policy seeks to ensure that vitality and viability of Southwark's town centres by protecting their core retail functions. Development is therefore required to retain or replaces A Use Classes with an alternative use that provides a service to the general public.

- 6.41. The policy supports the approach of, P39: Betting shops, pawnbrokers and pay day loan shops and P47: Hot food takeaways, by requiring development to not harm the amenity of town centres by contributing to the concentration of uses that harm town centre vitality and viability.
- 6.42. The policy also introduces a threshold of 1,000 m<sup>2</sup> of which development must provide free public toilets, public drinking fountains and public seating.
- 6.43. **Justification**
- 6.44. The NPPF sets out the need to take a positive approach to the growth, management and adaption of town centres. The NPPF recognises the important role town centres have at the heart of local communities and the need to define a network and hierarchy of town centres.
- 6.45. As such, this policy sets out Southwark's Town Centre Network which has been informed by an audit of town centres in the Southwark Retail Study 2015 and the wider evidence base.
- 6.46. Peckham Major Centre has a total retail provision of 56,630m<sup>2</sup>, this level of retail provision is in line with Major Town centre classification .
- 6.47. Elephant & Castle (including Walworth Road) Major Town Centre has a total retail provision of 44,460m<sup>2</sup>, this levels of retail provision is generally in line with Major Town centre classification, especially when accounting for additional provided from the redevelopment of Elephant and Castle Shopping Centre.
- 6.48. Canada Water Town Centre has an existing retail provision of 37,247m<sup>2</sup>,<sup>63</sup> whilst this is perhaps lower than what is expected for a Major Centre, it has been classified as such with regard to an anticipated additional retail floorspace which will be provided by the redevelopment of Surrey Quays Shopping Centre.
- 6.49. The draft New London plan identifies the Old Kent Road as an Opportunity Area. It's classification as a district town centre is anticipation in the growth in retail floorspace identified in the The Southwark 2018 Retail Study and planned for in the Old Kent Road Area Action Plan.
- 6.50. Trends in approvals for A Use Class in Elephant and Castle, Canada Water and the Old Kent Road are further highlighted in Appendix 3.
- 6.51. The analysis and justification of the town centre network, including district and local centres is set out in Section 3 Research and Evidence - Review of the role and hierarchy of centres.
- 6.52. The policy seeks to retain A Use Class space in anticipation of longer term growth which can support 16,303m<sup>2</sup> net (21,739m<sup>2</sup> gross) of comparison floorspace and

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<sup>63</sup> Southwark Council, *Canada Water Masterplan Planning Committee report* (2019)

1,954m<sup>2</sup> net (2,791m<sup>2</sup> gross) of convenience sales floorspace (above commitments and the Elephant and Castle and Canada Water proposals suggest).

- 6.53. The policy seeks to also manage the concentration of uses which harm the amenity of the local community and harm the vitality and viability of town centres. The justification of P39: Betting shops, pawnbrokers and pay day loan shops and P47: Hot food takeaways highlight ways in which the over concentration of centre uses can have a negative impact on public health and town centre vitality.
- 6.54. Crucially, the policy also supports the diversification of town centre uses where appropriate through allowing alternative A use class with an active use at ground floor in Southwark's town centres.
- 6.55. The retail sector has been going through a significant period of transformation, underscored by changing consumer behaviour, increased internet shopping and challenging economic conditions.<sup>64</sup> This policy will support the diversification of the town centre offer whilst maintaining the core retail function of many town centres in Southwark.
- 6.56. A local threshold of 1,000m<sup>2</sup> has been set, of which development for town centre uses above this threshold must provide public toilets, drinking fountains and seating. This is because developments over this size are likely to contribute significantly to the town centre environment and these facilities are currently lacking. The inclusion of these facilities will ensure our town centres continue to be accessible for all and will also benefit the shops provided because they will be providing an additional service to customers and ensuring they spend time in the town centre.
- 6.57. The local threshold of 1,000m<sup>2</sup> has also been set at which developments will require an impact assessment to demonstrate they will not harm the vitality and viability of centres.
- 6.58. In particular, existing developments outside of town centres are car dependent and encourage vehicular travel, which contributes to poor air quality. The developments are often poorly connected with their surroundings, as evidenced by the retail parks along the Old Kent Road which although provide shopping amenities provide barrier to cycling and walking.
- 6.59. The Southwark Retail Study 2015 states that the NPPF threshold of 2,500 m<sup>2</sup> gross is inappropriate as a blanket threshold within LB Southwark, as this scale of development would represent a significant proportion of the overall retail projections in each of the four zones within the borough. Development below 2,500 m<sup>2</sup> gross may also have cumulative impact implications. Development smaller than 2,500 m<sup>2</sup>

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<sup>64</sup> Rhodes, C., 'Retail sector in the UK', *Briefing Paper Number SN06186* (2018), House of Commons Library



gross could have a significant adverse impact on smaller centres. A reduced threshold of 1,000 m<sup>2</sup> has therefore been used in this policy.

- 6.60. This policy also ensures the provision of main town centre uses including markets. The borough has eight Southwark operated markets and four privately operated markets.
- 6.61. The Mayor of London's report, *Understanding London's Markets*, highlights that markets provide variety and diversity, history and character, providing a range of services and goods for local people and increase footfall to high streets and town centres.
- 6.62. The report states that markets have a place, economic and social. For example, they provide fresh and healthy food, social interaction and are open and accessible business incubators and skills developers.
- 6.63. Accordingly, this policy recognises the role of markets as part of a diverse retail offer within Southwark's town and local centres.
- 6.64. **Conformity with the London plan**
- 6.65. Policy SD6 Town Centres and high streets, sets out how the vitality and viability of London's varied town centres should be promoted and enhanced by, encouraging strong, resilient, accessible, and inclusive hubs with a diverse range of uses, including main town centre uses, night-time economy, civic, community, social and residential uses.
- 6.66. Policy SD7 Town centres: development principles and Development Plan Documents, outlines that boroughs should take a sequential approach. This is defined as a town centres first approach supported by the discouraging of out-of-centre development of main town centre uses.
- 6.67. Policy SD8 Town centre network, states that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, a vital element of London's economy.
- 6.68. The draft new London Plan Policy E9 Retail, markets and hot food takeaways, states that a successful, competitive and diverse retail sector, particularly for town centres, should be supported. The policy recognises that over-concentrations of some uses including, betting shops, pawnbrokers, pay-day loan stores and hot food takeaways can have an affect on health outcomes, wellbeing, amenity, vitality and viability. This policy also recognises the valuable economic, social and cultural role of markets.

**P36: Protected shopping frontages and (P37: Shops outside protected shopping frontages, town and local centres)**

- 6.69. Policy P32 of the New Southwark Plan aims to manage protected shopping frontages by ensuring that the percentage of units within the A1 Use Class do not fall below a particular percentage. A protected shopping frontage is a shopping area which has been designated to ensure that the quality, variety and high proportion of shops are maintained in the borough's main shopping parades.
- 6.70. This approach builds on Policy 1.9 of the Southwark Plan 2007 (July), which aims to manage protected shopping frontages by ensuring that the percentage of units within the A1 Use Class do not fall below 50%. In the New Southwark Plan we have sought a more tailored approach to the protection of A1 units through designating primary and secondary shopping frontages, an approach recommended in the evidence base, the Southwark Retail Study 2015.
- 6.71. Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. In secondary shopping frontages and the Central Activities Zone (CAZ), whilst shops are important, there is a greater diversity of activities and services such as restaurants, cinemas and businesses. Maintaining a healthy balance of uses in these locations is vital to protecting the vitality and viability of our centres.
- 6.72. The policy requires development which proposes a change of use from A1 in protected shopping frontages to demonstrate no market demand with evidence that the premises has been marketed for A1 Use Class for two years, immediately prior to any planning application, for both its existing condition and as an opportunity for improved shopping.
- 6.73. **Justification**
- 6.74. The NPPF sets out the need to take a positive approach to the growth, management and adaption of town centres.
- 6.75. The retail floorspace projections within the Southwark Retail Study Old Kent Road Update (2018) suggest that there is a need to retain A1 Use classes within the designated centres, protected shopping frontages, and other local shop and services.
- 6.76. The protected shopping frontage survey and Southwark Retail Study audit of major, district and local centres indicates highlights significant variation between centres. As such, the blanket approach of Policy 1.9 of the Southwark Plan 2007 (July) whilst providing some flexibility could go further, through the creation of primary and secondary shopping frontages, to maintain a high proportion of A1 uses in the most important town centre frontages.

- 6.77. The retail study suggests that the approach of designating primary and secondary shopping frontages would help maintain a high proportion of A1 uses in the main town centre frontages, whilst also allowing greater diversification in the wider town centre. This approach has been adopted in Peckham, where the primary shopping frontage (SF1) has an A1 use threshold of 75% and the secondary frontage has 50%.
- 6.78. There has been a strong preference from consultation to protect A1 shop units in our town centres, and this has been a strong policy requirement as the NSP has developed. Protected shopping frontage surveys undertaken by the policy team have informed the thresholds of primary frontages in P32 of the NSP.
- 6.79. The Retail Study, notes that whilst internet shopping and other non-traditional forms of retail have increased their market share; and town centres have diversified in terms of evening economy, leisure and entertainment, comparison retail goods are still the driver of growth in many centres.
- 6.80. Changing the policy requirement would leave the borough vulnerable to loss of crucial A1 use shop units and a potential proliferation of other uses which do not necessarily meet the needs of our town centres and would limit their competitiveness in a London context.
- 6.81. Comparisons of the councils shopping frontage surveys in 2015, 2017 and 2018 highlight a consistent trend of loss of A1 use classes in designated shopping frontages.
- 6.82. A comparison of protected shopping frontages surveyed in 2017 and 2018 highlights a consistent trend that in 67% of designated shopping frontages the percentage of A1 use class has declined. In particular, shopping frontages located in many of the key town centres of Southwark. For example, Peckham has decreased from 82% to 73%; Walworth Road has decreased from 75% to 60%; Lordship Lane 53% to 49%; and The Blue has gone from 94% to 51%.<sup>65</sup> See appendix 4 for a full comparison. (It is important to recognise that minor changes to the specific extents of the frontages have been made in a few instances and caution must be applied with direct comparison between the two years).
- 6.83. The tailored approach set out in this policy was initially informed by the 2017 protected shopping frontage survey.
- 6.84. Following the 2018 protected shopping survey, the threshold for the primary shopping frontage in Peckham (SF1) was amended to 75%. The justification behind this amendment is that as the main shopping area in Southwark and with an existing

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<sup>65</sup> Southwark Council, Protected Shopping Frontage Survey

high percentage (73%) of A1 units, the threshold should be lowered to reflect its current level and support town centre diversification. Alternatively, the other primary shopping areas, Elephant and Castle/Walworth Road, Camberwell, Lordship Lane and The Blue have not been amended in order to promote growth of A1 use class in these areas.

- 6.85. Although the LDD analysis provided in Appendix 5 shows that between the financial years of 2011 and 2018 there has been a net gain of 28,402 m<sup>2</sup> of A1 floorspace through completions, the LDD data tends to omit net changes of non-residential floorspace below 1,000sqm (particularly if no housing was proposed) of which the majority of retail units in protected shopping frontages would be included.
- 6.86. This policy also facilitates other town centre uses provided they offer a service to the general public, and would not harm the vitality and viability of the centre. The retail sector has been going through a significant period of transformation, underscored by changing consumer behaviour, increased internet shopping and challenging economic conditions.<sup>66</sup> This policy will support the diversification of the town centre offer whilst maintaining the core retail function of many town centres in Southwark, A1 use class.
- 6.87. The inclusion of a marketing clause of two years is consistent with other marketing policies in the plan. It is not the intention of the policy to encourage vacant units; but to discourage unnecessary loss of A1 use class floorspace. Southwark shops have very low average vacancy rate of 8.4% when compared to a national average of 12% in 2014.<sup>67</sup> It is important to maintain A1 uses because they offer services to the community. Marketing for one year may encourage shops to be left vacant for this time period until a change of use can be established. Marketing for two years would discourage this from happening and for the marketing strategy for be effective in finding an alternative A1 occupier, which continues to be in demand in Southwark.
- 6.88. The 400m threshold corresponds roughly to a walking time of approximately five minutes. This requirement ensures that local communities have access to local shops and services.
- 6.89. **Conformity with the London Plan**
- 6.90. Policy SD7 Town centres development principles and Development Plan Documents, states that in development plans boroughs should define specific policy-related designations such as primary and secondary frontages.
- 6.91. Policy SD6 Town centres and high streets highlights that household expenditure on retail is expected to rise but distributed unevenly among town centres. The approach

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<sup>66</sup> Rhodes, C., 'Retail sector in the UK', *Briefing Paper Number SN06186* (2018), House of Commons Library

<sup>67</sup> UK average for all town centres surveyed by Goad Plans (March, 2014)

in this policy allows for a more context specific approach to be taken in protecting the core use of many of Southwark's main shopping parades.

### **P39: Betting shops, pawnbrokers and payday loan shops**

- 6.92. Policy P39: Betting shops, pawnbrokers and payday loan shops, aims to manage the proliferation of betting shops, pawnbrokers and payday loan shops and their resulting impact on the health and wellbeing of the local population, and the vitality and viability of Southwark's town centres and high streets. In particular, there is concern about the clustering of these uses in key areas in the borough and their disproportionate impact on the most deprived communities in Southwark.
- 6.93. The policy seeks to support positive health outcomes and town centre vitality through limiting the proliferation of betting shops within protected shopping frontages to no more than 5% of the total number of units. The policy also addresses the clustering of betting shops, pawnbrokers and payday loan shops through ensuring that new premises must be at least 10 premises away from a premise of the same use.
- 6.94. The policy forms part of a holistic approach to limit the proliferation and clustering of betting shops, payday loan shops and pawnbrokers, this is supported by the Article 4 Direction to withdraw the permitted development rights granted by Schedule 2, Part 3, Class C, for changes of use from A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways) to A2 (financial and professional services) in Southwark's protected shopping frontages (Appendix C), which was implemented with immediate effect on 17 October 2013.<sup>68</sup>
- 6.95. **Justification**
- 6.96. The NPPF, section 8 Promoting healthy and safe communities, states that planning policies and decisions should 'enable and support healthy lifestyles, especially where this would address identified local health and well-being needs'.
- 6.97. The report, *Betting, borrowing and health: Health impacts of betting shops and payday loan shops in Southwark*, reviews the evidence around the health and wellbeing impacts of betting shops and payday loans shops. Whilst the report highlights that scientific evidence does not show a direct causal link between the clustering of shops and adverse health outcomes,<sup>69</sup> the evidence is clear that problem gambling is positively linked to poor health, low level and severe mental ill-

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<sup>68</sup> Planning Committee Report, Confirmation of the Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class C and Schedule 2, Part 4, Class D of the Town and Country Planning (General Permitted Development) Order 1995 (as amended)

<sup>69</sup> Ben Cave Associates Ltd, *Betting, borrowing and health: Health impacts of betting shops and payday loan shops in Southwark* (2014), p.12

health and a co-dependence on alcohol.<sup>70</sup> This view is further supported by the BMA Board of Science, who state problem gambling can affect physical and mental health, employment, finances and interpersonal relationships.<sup>71</sup>

- 6.98. Local authorities have a statutory duty to take appropriate steps to improve the health of their residents through the Health and Social Care Act 2012.
- 6.99. Accordingly, the Southwark's Health and Wellbeing strategy 2015-2020 outlines a strategic framework for improving health and wellbeing. This includes, addressing the wider socio-economic and environmental determinants of health. The strategy also highlights the role of restricting betting shops, hot food takeaways and payday loan shops.
- 6.100. Through managing the proliferation and resulting impact of betting shops, this policy will address the persistent health inequalities linked to problem gambling. The Health Survey for England highlights the relationship between moderate risk and problem gambling with the areas of highest health deprivation in England, (including Southwark).<sup>72</sup> A number of other studies have also highlighted the significant relationship between area deprivation and the density of gambling machines, in particular, disadvantaged groups whilst not more likely to gamble are more likely to experience the worst effects of gambling.<sup>73</sup>
- 6.101. The Health Survey for England highlights census projections for 2014, which show that 8,970 men and 2,340 women are likely to have been at risk of harm from their gambling behaviour in Southwark.
- 6.102. The report highlights a set of predictor variables that may lead to problem gambling:
1. Having family problems,
  2. Having conduct problems,
  3. Being addicted to drugs or alcohol; and
  4. Being male<sup>74</sup>
- 6.103. There is a significant amount of evidence which evidences the positive correlation between gambling, problem gambling and the accessibility to gambling, whilst it is important to recognise the complex and context dependent relationships, it is often

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<sup>70</sup> *Betting, borrowing and health*, p.2

<sup>71</sup> BMA Board of Science, *Gambling addiction and its treatment within the NHS. A guide for healthcare professionals* (2007) Ed. Griffiths, M.

<sup>72</sup> Wardle H, Seabury C. Gambling behaviour. Health Survey for England: 2012. Health and Social Care Information Centre; 2013. ch.7; p. 1-33.

<sup>73</sup> Wardle, H. et al., *British Gambling Prevalence Survey*, National Centre for Social Research (2010); Welte, J. W. et al., 'Risk factors for pathological gambling', *Addictive Behaviors* (2004), 29(2); Orford, J. et al., 'The role of social factors in gambling: evidence from the 2007 British Gambling Prevalence Survey', *Community Work and Family* (2010), 13(3); Welte, J. W. et al., 'The relationship of ecological and geographic factors to gambling behavior and pathology', *Journal of Gambling Studies* (2004), 20(4); Volberg, R. A. et al., 'Prevalence and risks of pathological gambling in Sweden' *Acta Psychiatr Scand* (2001)

<sup>74</sup> *Betting, borrowing and health*, p.14

asserted that in areas with high concentrations of gambling facilities there are higher levels of gambling activity.<sup>75</sup>

- 6.104. There are particular protected shopping frontages within Southwark which have a high proportion of clusters of betting shops or pay day loan shops, for example, Walworth Road (8%), Camberwell/Denmark Hill (6%) and Rye Lane (5%).
- 6.105. Southwark Council licensing data, the overall number of betting shops in the borough has not increased during the period from 2007-2013. Nevertheless, the overall number of betting shops is very high in comparison with other local authorities. Data from the Campaign for Fairer Gambling Southwark, highlights that this borough is ranked as one of the highest amongst local authorities in London and in the UK for the number of betting shop licences and the number of Fixed Odd Betting Terminals (FOBTs).<sup>76</sup>
- 6.106. According to Southwark Licensing data, in 2019 there are a total of 57 betting shops in Southwark.<sup>77</sup>

<b>Operator</b>	<b>Units</b>
William Hill	15
Ladbrokes	9
Betfred	15
Coral	3
Paddy Power	6
Jennings bet	2
Cashino	2
Admiral	5
<b>Total</b>	<b>57</b>

- 6.107. There has been concern in the local community about the effect of the proliferation and clustering of betting shops in the borough. A campaign ‘High Streets First’ was started in Southwark in 2012 by local residents and a councillor from The Lane ward. A petition was sent to Eric Pickles MP (Secretary of State for Communities and Local Government) to restrict the number of betting shops on Southwark’s high streets through further government regulation.<sup>78</sup>

<sup>75</sup> Ibid., p.21; and Marshall, D., ‘Gambling as a public health issue: the critical role of the local environment’, *Journal of Gambling Issues* (2009)23:66-80

<sup>76</sup> Planning Committee Report, Confirmation of the Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class C and Schedule 2, Part 4, Class D of the Town and Country Planning (General Permitted Development) Order 1995 (as amended)

<sup>77</sup> Southwark Council, Licensing Register <http://app.southwark.gov.uk/licensing/licenseregister.asp>

<sup>78</sup> Ibid.

- 6.108. These campaigns and petitions highlight a recurrent negative perception of betting shops in Southwark. This is further evidenced in a report by ROI TEAM, of which there are strong levels of agreement with the statement ‘They make the town centre less attractive’. On a rating from scale of ‘1 disagree strongly’ to ‘5 agree strongly’, Borough scored 3.93, Camberwell 3.69, Peckham 3.8, and Walworth 3.53.<sup>79</sup>
- 6.109. The policy also seeks to address the health outcomes associated with payday loan shops. The Southwark Betting, borrowing and health report reviews the literature in support of this policy approach.
- 6.110. The report recognises that payday loan shops can contribute to unmanaged debt which can have a negative impact on health outcomes. Debt has been linked to: long term illness or disability, chronic fatigue, higher incidences of obesity, poor mental health, and worse health related quality of life.<sup>80</sup> This can be exacerbated by payday loan shops limiting the ability for residents to build capital and spend on health promoting activities, including healthy food.<sup>81</sup>
- 6.111. Additionally, payday lenders are more likely to populate low-income areas which can further contribute to health inequalities.
- 6.112. The policy is designed to limit the number of betting shops, payday loan shops and pawnbrokers within protected shopping frontages to no more than 5% of the total number of units. The 5% threshold is positively prepared and intends to bring the number of these uses more in line with the national average of 4% for betting shops in town centres.<sup>82</sup>
- 6.113. **Conformity with the London plan**
- 6.114. The draft New London Plan policy SD6 Town centres and high streets promotes a diverse range of uses. This policy seeks to ensure that the over-concentration of betting shops, pay day loan shops and pawnbrokers does not harm overall town centre diversity, vitality and viability.
- 6.115. The draft new London Plan Policy E9 Retail, markets and hot food takeaways, states that a successful, competitive and diverse retail sector, particularly for town centres, should be supported. The policy recognises that over-concentrations of some uses including, betting shops, pawnbrokers, pay-day loan stores and hot food takeaways can have an affect on health outcomes, wellbeing, amenity, vitality and viability.

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<sup>79</sup> ROI Team, *Understanding Perceptions of Southwark Town Centres* (2014)

<sup>80</sup> *Betting, borrowing and health*, p.35

<sup>81</sup> *Betting, borrowing and health*, p.41

<sup>82</sup> UK average for all town centres surveyed by Goad Plans (March, 2014)



6.116. The London Town Centre Health Check also highlight that certain uses have higher amounts of floorspace in town centres in strategic areas for regeneration. This is well replicated in the number of the uses in protected shopping frontages/town centres in Peckham, Old Kent Road, Elephant & Castle/Walworth, and Canada Water. The report recommends using local plans to mitigate against the over-concentration of specific uses.

#### **P41: Pubs**

6.117. Policy P41: Pubs aims to protect against the loss of pubs through change of use or as a result of development. The policy recognises that pubs make a strong contribution to the historic character and social fabric of an area, particularly through their architectural features and historical and cultural connections. Pubs also make a strong contribution to Southwark's vibrant and diverse night-time economy.

6.118. The policy requires in exceptional circumstances the loss of a pub will be permitted where there is no market demand for the pub use. This has to be demonstrated by a marketing exercise for two years. If a change of use is permitted, development must retain the design, character and heritage value of the building where it makes a positive contribution to the built environment.

#### **6.119. Justification**

6.120. The Institute of Public Policy Research's report *Pubs and Places: The Social Value of Community Pubs* (2012), recognises the contributions pubs make to the economy, community cohesion, civic participation, the provision of informal public services, and their cultural value.<sup>83</sup>

6.121. GLA Economics' *Closing time: London's public houses* (2017) also highlights that the number of public houses and bars in London has seen a net decline since 2001. The number of pubs in London has decreased by 25% from 4,835 in 2001 to 3,615 in 2016.<sup>84</sup>

6.122. The report highlights that over this period a total of 2,295 pubs closed in London, an average of 135 per annum. In particular, the report notes that Southwark has seen a relatively large number of closures as a proportion of current pub stock in the last 17 years.

6.123. This is significant, when considering the economic contribution pubs make to London's night-time economy, for example, pubs provided 46,300 jobs in 2016.<sup>85</sup>

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<sup>83</sup> IPPR, Muir, R., *Pubs and Places: The Social Value of Community Pubs* (2012)

<sup>84</sup> GLA Economics, Wickham, M. and Cominetti, N., *Closing Time: London's public houses* (2017), 5

<sup>85</sup> *Ibid.*, 2

- 6.124. The Council introduced an Article 4 Direction to protect traditional public houses across the borough. The Immediate Article 4 Direction: Public Houses; came into effect on 13 March 2017 and relates to development consisting of the change of use, demolition or alteration of public houses in respect of:
1. General Permitted Development Order 2015 (as amended)
  2. Schedule 2, Part 2, Class A and Class C (alteration or construction of any means of enclosure or any exterior painting)
  3. Schedule 2, Part 3, Class A and Class B (changes of use to shops (A1), financial and professional services (A2), restaurants or cafes (A3))
  4. Schedule 2, Part 11, Class B and Class C (demolition of buildings or means of enclosure).
- 6.125. The number of pubs across London has been declining and they are at risk of conversion or demolition. Southwark has lost a third of its pubs in the period 2007-2017, this represents 79 pubs lost in the borough with 164 public houses remaining.<sup>86</sup> A number have changed into other commercial uses and have lost their appearance and usage as a public house. The planning committee report on this Article 4 direction states that in ten years prior to 2017, Southwark received 68 planning applications (including prior approval applications) in relation to the change of use or demolition of a pub.<sup>87</sup>
- 6.126. The loss of public houses has a significant impact on the variety of architectural heritages associated with public houses in Southwark. For example, the George Inn, the only surviving galleried coaching inn in London dating back to the 18<sup>th</sup> Century; the majority of pubs in Southwark are Victorian/Edwardian (late 19<sup>th</sup> Century early 20<sup>th</sup> Century, these include the Royal and the Gladstone; The Old Nun's Head, an example of inter-war pub architecture; and the Canterbury Arms an example of post-war pub and community hub.
- 6.127. These typologies, among others, are evident across Southwark and represent a varied stock of building styles that are important to local historic character.
- 6.128. The council now have ten public houses which are designated as assets of community value – this reflects the aspiration from the local community to protect local public houses from redevelopment or change of use.<sup>88</sup>
- 6.129. The government subsequently changed the General Permitted Development Order on 23 May 2017 to provide further protection to pubs. Town and Country Planning

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<sup>86</sup> Southwark Council, *Confirmation of Article 4 direction to withdraw the permitted development rights associated with the change of use, demolition and alteration of public houses in Southwark* (2017)

<sup>87</sup> Ibid.

<sup>88</sup> Ibid.

(General Permitted Development) (England) (Amendment) (No.2) Order 2017 came into effect. This Order amends the Town and Country Planning (General Permitted Development) (England) Order 2015. Article 3 of the Amendment (No.2) Order, 2017, removes permitted development rights allowing the change of use of a building falling within Class A4 to a building within Classes A1 (shops), A2 (financial and professional services), and A3 (restaurants and cafes).

- 6.130. This policy further supports a general policy consensus that public houses should be protected as important, social, economic and heritage infrastructure of local areas.
- 6.131. The inclusion of a marketing clause of two years is consistent with other marketing policies in the plan. The intention of this clause is to pubs because they offer important services to the community. Marketing for one year may encourage pubs to be left vacant for this time period until a change of use can be established, marketing for two years would discourage this from happening and encourage owners to find an alternative A4 occupier.
- 6.132. Additionally, the draft new London plan states that pubs should have been marketed as a pub for at least 24 months, to demonstrate that a building used as a pub is not likely to be used as a pub in the foreseeable future. The adopted approach in this policy is therefore in line with the approach set out in this emerging development framework.
- 6.133. **Conformity with the London Plan**
- 6.134. The draft new London plan recognises the loss of pubs as a strategic issue. Policy HC7 Protecting public houses, acknowledges that the significant loss of pubs is a key strategic issue in the context of London. The policy states that development plan documents, town centre strategies and planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy and mixed used development.
- 6.135. Policy HC6 Supporting the night-time economy, states that development plans, town centre strategies and planning decisions should protect and support evening and night-time cultural venues such as pubs.
- 6.136. This is reiterated in Policy 5 of the Mayor of London's Culture strategy, which states that the draft London plan will be the most pro-culture, including policies to protect creative and artist workspaces, clubs and pubs.<sup>89</sup>
- 6.137. The Mayor of London's Culture and the night-time economy SPG, highlights planning tools to provide protection to pubs, Article 4 directions, designation as an

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<sup>89</sup> Greater London Authority, *Mayor of London's Culture Strategy: Culture for all Londoners* (2018)

Asset of Community Value or heritage protection. The policy treats the designation of a pub as an Asset of Community Value as a significant material consideration.

- 6.138. The approach adopted in this policy seeks to protect pubs from change of use, or demolition as a result of development to ensure Southwark residents have access to key form of social infrastructure.

#### **P45: Hot food takeaways**

- 6.139. Policy P45: Hot food takeaways aims to improve the health environment as a means improve health outcomes and reduce excess weight in Southwark's communities. In particular, managing the health environment around secondary schools through restricting the development of hot food takeaways within 400 metres of secondary school exits and entrances.

- 6.140. The policy also limits the proliferation of A5 use class units to no more than 5% in protected shopping frontages, and not above 1 per 21 units (10 on either side of a proposal).

- 6.141. Additionally, the policy recognises the potential affect on public amenity that hot food takeaways may have through ensuring that grease traps are installed and suitable kitchen extraction systems.

#### **6.142. Justification**

- 6.143. The NPPF, section 8 Promoting healthy and safe communities, states that planning policies and decisions should 'enable and support healthy lifestyles, especially where this would address identified local health and well-being needs'.

- 6.144. The planning practice guidance on Healthy and safe communities illustrates that planning can influence the built environment to improve health outcomes and reduce excess weight in communities. The guidance outlines that planning policies, where justified and evidenced, can seek to limit the proliferation of particular uses.<sup>90</sup>

- 6.145. The guidance states that, planning policies may need to have particular regard of the following issues:

1. Proximity to locations were children and young people congregate such as schools, community centres and playgrounds
2. Evidence indicating high levels of obesity, deprivation, health inequalities and general poor health in specific locations
3. Over-concentration of certain uses within a specified area
4. Odours and noise impact
5. Traffic impact
6. Refuse and litter

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<sup>90</sup> MHCLG, *Healthy and safe communities* (2019), <https://www.gov.uk/guidance/health-and-wellbeing>

- 6.146. The Southwark Council report – *P47 Hot Food Takeaways: Review of the evidence*, provides the evidence base in support of the P47 Hot Food Takeaways policy.<sup>91</sup>
- 6.147. This report provides a summary of the evidence indicating high levels of excess weight in Southwark, and the evidence that links excess weight to the ‘food environment’ and especially hot food takeaways.
- 6.148. The Southwark evidence base references a number of studies which address the causes of excess weight and the role of the built environment and planning system to improve health outcomes:
1. Foresight Report (2007) into the causes of overweight and obesity, namely: biology, activity environment, physical activity, societal influences, individual psychology, food environment, and food consumption.<sup>92</sup>
  2. The Marmot Review (2010) highlights the role of social inequalities, including environmental inequalities, in the determination of health inequalities.<sup>93</sup>
  3. The Government’s White Paper *Healthy Lives, Healthy People* (2010) builds on the Marmot Review’s focus in tackling health inequalities and recognises the important role of local authorities.<sup>94</sup>
  4. *The Healthy People, Healthy Places: A Call to Action on Obesity in England* (2011) emphasises the need to take a comprehensive and integrated range of interventions to tackle obesity, including the built and physical environment.<sup>95</sup>
  5. *Obesity and the environment: regulating the growth of fast food outlets* (2014) further emphasises the role of local authorities to address obesity through producing guidance focussing on planning policy.<sup>96</sup>
  6. Chapter 2 of the Government’s *Childhood Obesity Plan* (2018) sets out a number of evidence-based actions in order to halve childhood obesity by 2030.
- 6.149. Local authorities have a statutory duty to take appropriate steps to improve the health of their residents through the Health and Social Care Act 2012.
- 6.150. Accordingly, the Southwark’s Health and Wellbeing strategy 2015-2020 outlines a strategic framework for improving health and wellbeing. This includes, addressing the wider socio-economic and environmental determinants of health. The strategy also highlights the role of restricting betting shops, hot food takeaways and payday loan shops.

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<sup>91</sup> Southwark Public Health, *P45 Hot Food Takeaways: Review of the evidence* (2018)

<sup>92</sup> Foresight (2007) *Tackling Obesities: Future Choices – Obesogenic Environments – Evidence Review*  
Government Office for Science

<sup>93</sup> Marmot, M. et al., *Fair Society, Healthy Lives: The Marmot Review* (2010)

<sup>94</sup> Department of Health, *Healthy Lives, Healthy People: Our strategy for Public Health in England* (2010)

<sup>95</sup> Department of Health, *Healthy People, Healthy Places: A call to action on obesity in England* (2011)

<sup>96</sup> Public Health England, *Obesity and the environment: regulating the growth of fast food outlets* (2014)

- 6.151. The council has undertaken Joint Strategic Needs Assessments which underscore high levels of obesity, deprivation, health inequalities and general poor health in the borough and within specific local areas.
- 6.152. The JSNA report, *The health of school-aged children and young people in Southwark (5-19 years)*,<sup>97</sup> highlights that child obesity and excess weight is significantly above the London and UK average. In particular, excess weight is significantly higher among deprived communities, and the association increases with age. This is particularly important as 40% of children in Southwark are living in poverty after housing costs in 2019.<sup>98</sup>
- 6.153. There is a substantial evidence base that supports the need for policy intervention to that policy intervention is required to address the obesity in the borough, in particular amongst children.
- 6.154. National Child Measurement Programme (NCMP) data from the 2017-18 update shows that 25.4% of Reception-aged children and 39.8% of Year 6 children in Southwark are overweight (including obesity).<sup>99</sup>
- 6.155. This compares to a 22.4% of reception aged children and 34.3% of Year 6 children in England overall.<sup>100</sup> This shows that Southwark has a worse percentage of children in Reception and in Year 6 who have excess weight. When compared to other London boroughs, the prevalence of obesity becomes more stark, with Southwark ranked 4<sup>th</sup> in prevalence of overweight reception-aged children.
- 6.156. When compared to the 32 other London boroughs, Southwark is ranked as having the third highest prevalence of excess weight among both Reception and Year 6 children. The borough is also ranked second for obesity among Reception age children and fifth among Year 6 children compared to other London boroughs 54. This increase in obesity between Reception and Year 6 is statistically significant.
- 6.157. Appendix 1 and Appendix 2, provide summaries of the percentages of A5 uses in designated primary and secondary shopping frontages. A number of these protected shopping frontages have high percentages of hot food takeaways (A5 uses) when compared to the combined national average of A3/A5 uses, 14.7%.<sup>101</sup> The following protected shopping frontages have considerably high percentages of A5 uses within

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<sup>97</sup> Southwark Public Health, *The health of school-aged children and young people in Southwark (5-19 years)* (2017)

<sup>98</sup> <http://www.endchildpoverty.org.uk/poverty-in-your-area-2019/>

<sup>99</sup> Public Health England, *NCMP and Child Obesity Profile*, <https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data#page/1/gid/8000011/pat/6/par/E12000007/ati/101/are/E09000028/iid/20602/age/201/sex/4> (Accessed 2019)

<sup>100</sup> Ibid.

<sup>101</sup> UK average for all town centres surveyed by Goad Plans (March 2014)

protected shopping frontages Waterloo Road (SF9) 27%, Ilderton Road (SF25) 27%, Queens Road (SF31) 36%, Gibbon Road (SF33) 27%, and Lordship Lane (SF48) 26%.

- 6.158. The policy is designed to limit the number hot food takeaways within protected shopping frontages to no more than 5% of the total number of units. The 5% threshold is positively prepared and intends to bring the number of these uses more in line with the national average for A3/A5 uses in town centres, with A3 uses contributing the majority of units within this average.<sup>102</sup>
- 6.159. The limitation on new A5 uses being situated 400m boundary from schools corresponds roughly to a walking time of approximately five minutes. This approach is acknowledged by Public Health England as being used by a significant number of local authorities to define fast food exclusion zones.<sup>103</sup>
- 6.160. **Conformity with the London Plan**
- 6.161. The draft New London Plan Policy E9 Retail, markets and hot food takeaways, states that a successful, competitive and diverse retail sector, particularly for town centres, should be supported.
- 6.162. The policy explicitly states that ‘development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also carefully manage the over-concentration of A5 hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.

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<sup>102</sup> UK average for all town centres surveyed by Goad Plans (March, 2014)

<sup>103</sup> Public Health England, *Obesity and the environment: regulating the growth of fast food outlets* (2014), p.7

## **7. Town centre mapping and policies review**

- 7.1. This section sets out a future review of the New Southwark Plan's retail and social infrastructure policies within the Major Town Centres, starting with Peckham Major Town Centre, with scope for a further review across the borough's main centres (including the Old Kent Road) following the completion of this project.
- 7.2. The policy review will evaluate the methodology used to define primary and secondary shopping frontages. A written methodology for the designation of primary and secondary shopping frontages will be produced, which will include quantitative and qualitative indicators for designation.
- 7.3. The primary and secondary shopping frontage extents will be reviewed to assess if they are working to support the ability of residents and businesses to benefit from the local economy. Through consultation with relevant stakeholders and an assessment of planning decisions, the project will assess if the protected shopping frontage extents are helping to improve, diversify and support the unique identity of the Major Town Centres.
- 7.4. A key part of this review will be the identification and mapping of town centre uses. This will include mapping uses classes, building typologies, 'anchor' retailers and institutions which draw footfall, vacant units and recently approved and implemented developments. The mapping will also highlight the role of the various town centre uses in this area.
- 7.5. The review will consult stakeholders to understand how the retail and social infrastructure policies are affecting businesses in practice, and what the current business needs are considering the restructuring of the retail economy. Further consultation will be conducted within the council and with the wider local community.
- 7.6. New Southwark Plan retail policies review:
  1. An assessment will be conducted to review the minimum A1 threshold in response to any changes which may have occurred to the proportion of A1 units in Peckham Major Town Centre.
  2. A Town Centre Health Check will be conducted to assess if the town centre offer needs to diversify to respond to current retail and economic trends, and what t state of our high streets and town centre
  3. Ensure the town centre uses reflects shifting demographics and consumer behaviours
- 7.7. Although Southwark has a below average vacancy rate (compared to national average), a key aim of this project will be to assess if the NSP planning policies are supporting the creation of active frontages along our high streets.



## 8. Conclusion

- 8.1. In conformity with the NPPF, NPPG and London Plan, this background paper has set out an assessment of retail capacity in the borough. This paper explains the council's town centre network and hierarchy, the application of the sequential approach in Southwark, forecasts of retail floorspace capacity and expenditure, and the management of town centre uses.
- 8.2. The Southwark Retail Study 2015 and The Southwark Retail Study Old Kent Road update 2018 review the current performance of the borough's retail provision and forecast the capacity for additional retail floorspace until 2031.
- 8.3. Southwark's existing retail provision is comprised of 208,666m<sup>2</sup> (gross) of retail sales floorspace; 44% of the existing retail provision is accommodated within food stores and convenience goods shops; the remaining 56% of existing retail provision is accommodation in comparison goods shops.
- 8.4. Overall, Southwark's centres provide a healthy picture in terms of meeting the needs of the borough's residents for comparison, convenience and main town centre uses.
- 8.5. The available convenience goods spend in the borough was £1,296 million in 2014, it is estimated that the convenience goods expenditure leakage from the borough is around £77 million in 2014. The available comparison goods expenditure was £1,632 million in 2014, with expenditure retention ranging between 61% and 38%. The study suggests that the retention rates for comparison and convenience shopping are reasonable, in particular when acknowledging the proximity of central London shopping facilities.
- 8.6. The retail floorspace projections for Southwark were updated in the Southwark Retail Study Old Kent Road update (2018) which identifies that surplus expenditure in 2031 (over and above commitments and proposals) could support an additional 16,303m<sup>2</sup> net (21,739m<sup>2</sup> gross) of comparison floorspace<sup>104</sup> and 1,954m<sup>2</sup> net (2,791m<sup>2</sup> gross) of convenience sales floorspace.<sup>105</sup>
- 8.7. The New Southwark Plan policies continue to support the increase in retail floorspace as forecast in the Southwark Retail Study (2018). Crucially, data from the London Development Database (LDD) highlights that between the financial years of 2011 and 2018 there has been a net gain through approvals of 35,518 m<sup>2</sup> of A1 use class space, and a net gain of 28,402 m<sup>2</sup> through completions. (See Appendix 5 for breakdown by year of approvals and completions).

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<sup>104</sup> Ibid., Appendix 3, Table 21

<sup>105</sup> Ibid. p.6

- 8.8. The strategy will seek to support an increase in the comparison goods floorspace throughout the borough and particularly within the Elephant and Castle, Canada Water, Peckham and the Old Kent Road town centres. To help achieve our floorspace projection this plan anticipates the redevelopment of our key shopping centres in the three Major Town Centres, Elephant and Castle Shopping Centre, Surrey Quays Shopping Centre and the Aylesham Centre.
- 8.9. The approval of two significant applications in 2019, the Elephant and Castle Shopping Centre and the Canada Water Masterplan have formed a crucial part of the strategy to meet the forecast growth of retail floorspace. The Elephant and Castle Shopping Centre will deliver 3,102 sqm (net) A1-A4 floorspace and 2,806 sqm (net) A1-A4/B1 floorspace.
- 8.10. The Canada Water Masterplan has been approved seeking planning permission for Phase 1 and outline planning permission for future phases of the redevelopment of this site. The approved application seeks to deliver up to 88,432 m<sup>2</sup> of retail (Class A) across the Masterplan site, with a commitment to a minimum provision of 46,452m<sup>2</sup>.
- 8.11. The draft Old Kent Road Area Action Plan anticipates a growth in retail and sets out the intention to transform the Old Kent Road into a linear high street with shops, health, leisure and entertainment venues, restaurants and cafes.
- 8.12. For the Old Kent Road area, the Southwark retail study 2018 (over and above commitments and proposals) suggests that A1-A5 use class floorspace can be increased from 64,500 m<sup>2</sup> gross to 90,000 m<sup>2</sup> gross over the period, 2018-2031.
- 8.13. The ability of the town centres to accommodate the scale of assessed capacity for additional retail floorspace is highlighted in the site allocations methodology paper with a town centres uses (A1, A2, A3, A4, D1, D2) capacity of 133,022m<sup>2</sup> gross in designated town centres.
- 8.14. The Retail study conducted a town centre audit, providing an analysis of the main town centres throughout the borough. In particular, to inform the designation of Southwark's town centre network and protected shopping frontages.
- 8.15. This policy defines Southwark's town centre network and hierarchy in accordance with the NPPF. The policy reflects the draft London Plan's Town Centre Network, of which Elephant and Castle, Peckham and Canada Water are designated as Major Town Centres. This policy also introduces Old Kent Road north and Old Kent Road south as two new District Town Centres, a reflection of the growth in commercial space anticipated in this Opportunity Area.
- 8.16. The strategy continues to support main town centre uses to ensure town centre viability and vitality, through the provision of a diverse range of shop units, key social

infrastructure, employment opportunities, a thriving night-time economy and affordable space for small and independent businesses.

- 8.17. The town centre approach acknowledges that comparison retail is the core driver of growth within many of Southwark's town centres, and accordingly prioritises the protection of the core retail function, A1 use, whilst also supporting the retention and uplift of A2, A3 and A4 use classes where there is an identified capacity. Nevertheless, the diversification of town centres is supported where appropriate, in response to changing consumer behaviours and online shopping/multi-channel retailing.
- 8.18. The retail and town centre uses background paper also sets out how the borough will manage the concentration of uses which harm the amenity of the local community and harm the vitality and viability of town centres and health outcomes of Southwark residents, in particular betting shops, pawnbrokers, pay day loan shops and hot food takeaways.

## Appendix 1 – Primary Shopping Frontage Summary

The primary and secondary shopping frontage surveys were undertaken by council planning officers in autumn 2018. A visual assessment was used to determine each unit's use class, street number, name, vacancy, and location within each shopping frontage, further investigation using the Council's planning register was used for clarification of use class where a visual assessment was unclear. The table below is a summary of the data collected to support the designation of primary and secondary shopping frontages, and their New Southwark Plan A1 Use class recommended thresholds.

There is a potential for minor discrepancies in the percentages of use classes, as a result of differences between the visual assessment and a unit's lawful use. This could emerge either through error, recent change of use applications or unlawful changes of use.

Primary Shopping Frontages						
Schedule ID	Name	Frontage	Summary % of A1 Units		Vacancy %	Summary % of A5 units
			NSP Recommended Level	Existing Level		
SF1	Peckham	43-125 (odd) Rye Lane	75%	73%	9%	2.66%
		Units 1-10 (con); & Units 12-18 (con), Aylesham Centre, Rye Lane				
		1-5 (con) Central Buildings, Rye Lane				
		127-149 (odd) Rye Lane				
		151-175 (odd) Rye Lane				
		2-82 (even) Rye Lane				

		46-66 (even) Peckham High Street				
		74-122 (even) Peckham High Street				
		84-112 (even) Rye Lane				
		116a-150 (even) Rye Lane				
SF2	Walworth Road	169-197 (odd) Walwoth Road	75%	60%	4%	7.35%
		199-345 (odd) Walworth Road				
		204-326 (even) Walworth Road				
		347-375 (odd) Walworth Road				
		330-354 (even) Walworth Road				
		358-374 (even) Walworth Road				
SF3	Camberwell	334-354 (even) Camberwell New Road	60%	47%	10.26%	7.35%
		8-76 (even) Denmark Hill				
		1-23 (odd) Denmark Hill				
		(Units) 1-17 (con) Butterfly Walk				
		7-17 (con) Camberwell Green				
		18-25 (con) Camberwell Green				
		3-23 (odd) Camberwell Church Street and 27 Camberwell Green				
		2-28 (even) Camberwell Church Street				
		319-325 (odd) Camberwell New Road				
		25-43 (odd) Denmark Hill				
SF4	Lordship Lane	1-27 (odd) Lordship Lane	55%	49%	7.53%	3.23%

		29-43 (odd) Lordship Lane				
		45-91 (odd) Lordship Lane				
		93-115 (odd) Lordship Lane				
		98-106 (even) Grove Vale				
		2-6 (even) Lordship Lane				
		8-24 (even) Lordship Lane				
		26-44 (even) Lordship Lane				
		46-66 (even) Lordship Lane				
		68-94 (even) Lordship Lane				
		96-106 (even) Lordship Lane				
SF5	The Blue	186-194a (even) Southwark Park Road	70%	51%	3.75%	5.00%
		196-256 (even) Southwark Park Road				
		193-221 (odd) Southwark Park Road				
		1-13a (con) Market Place, Southwark Park Road				
		239-243 (odd) Southwark Park Road				
		258-270 (even) Southwark Park Road				
		249-289 (odd) Southwark Park Road				
		177-191 (odd) Southwark Park Road				
SF6	Hopton Street	50-62 (even) Hopton Street	40%	40%	0%	0%
SF7	The Cut	33-53 (odd) The Cut	40%	38%	13%	0%
SF8	Borough High	2-20 (even) Southwark Street	40%	13%	15%	10%

	Street	28-34 (even) Borough High Street				
		38-94 (even) Borough High Street				
		100-154 (even) Borough High Street				
		200-230 (even) Borough High Street				
		11-21 (odd) Borough High Street				
		27-111 (odd) Borough High Street				
		121, 123, 125, 127, 131 & 133-137 Borough High Street				
		145-149 (odd) Borough High Street				
		151-169 (odd) Borough High Street				
		1-6 Stoney Street				
SF9	Waterloo Road	187-235 (odd) Waterloo Road	40%	33%	0%	27%
SF10	Great Suffolk Street	156-176 (even) Great Suffolk Street	40%	53%	0%	7%
		101-109 (odd) Great Suffolk Street				
SF11	Snowsfields and Weston Street	8-11 (con) Snowsfields	40%	39%	0%	0%
		30-43 (con) Snowsfields				
		62-66 (even) Weston Street				
		92-101 (odd) Snowsfields				
SF12	Colechurch House	1-9 Colechurch House (London Bridge Walk)	40%	67%	0%	0%
SF13	Hay's Galleria	Hay's Galleria	40%	44%	0%	0%
		1-4 Battle Bridge Lane				

		Frontages on Hay's Lane and Counter Street				
		51-57 (odd) Tooley Street (The Counting House)				
SF14	Tooley Street	96-106 Tooley Street	40%	33%	0%	0%
SF15	Bermondsey Street	82-98 Bermondsey Street	40%	27%	8%	0%
		112-132 Bermondsey Street				
		159-177 Bermondsey Street				
		99-109 Bermondsey Street				



## Appendix 2 – Secondary Shopping Frontage Summary

Secondary Shopping Frontages						
Schedule ID	Name	Frontages	Summary % of A1 Units		Vacancy %	Summary % of A5 units
			NSP Recommended Level	Existing Level		
SF16	Dockhead	23-41 (odd) Dockhead	50%	50%	10%	0%
SF17	Jamaica Road	125-151 (odd) Jamaica Road	50%	54%	0%	0%
SF18	Jamaica Road	142-145 (con) Jamaica Road	50%	43%	3%	9%
		156-250 (even) Jamaica Road				
SF19	Albion Street	20-52 (even) Albion Street	50%	50%	0%	0%
SF20	Harper Road	16-42 Harper Road	50%	50%	33%	0%
SF21	Tower Bridge Road	66-102 (even) Tower Bridge Road	50%	41%	10%	3%
		73-113a (odd) Tower Bridge Road				
		104-116 (even) Tower Bridge Road				
		25-71 (odd) Tower Bridge Road				
SF22	Lower Road and Plough Way	162-196 (even) Lower Road	50%	35%	11%	11%
		126-160 (even) Lower Road				
		198-218 (even) Lower Road				
		185--215 (odd) Lower Road				
		229-243 (odd) Lower Road				

		1-15 (odd) Plough Way				
		17-27 (odd) Plough Way				
SF23	Walworth Road, East Street and Camberwell Road	389-405 (odd) Walworth Road	50%	58%	7%	7%
		376-24 (even) Walworth Road/Camberwell Road				
		1-39 (odd) Camberwell Road				
		49-67 (odd) Camberwell Road				
		69-91 (odd) Camberwell Road				
		26-44 (even) Camberwell Road				
		1-83 (odd) East Street				
		2-92 (even) East Street				
		112-118 (even) East Street				
		94-98 (even) East Street				
SF24	Old Kent Road, East Street and Dunton Road	157-231 (odd) Old Kent Road	50%	40%	16%	9%
		249-279 (odd) Old Kent Road				
		202-206 (even) Dunton Road				
		152-320 (even) Old Kent Road				
		352-388 (even) Old Kent Road				
		303-311 (odd) East Street				
		342-358 (even) East Street				
SF25	Ilderton Road	1-17 (odd) Ilderton Road	50%	55%	0%	27%
SF26	Maddock Way	1-14 Maddock Way	50%	63%	0%	0%

SF27	Peckham Park Road and Old Kent Road	1-21 (odd) Peckham Park Road	50%	35%	29%	9%
		6-24 (even) Peckham Park Road				
		620-638 (even) Old Kent Road				
		644-674 (even) Old Kent Road				
		720-726 (even) Old Kent Road				
		SF28 Camberwell				
SF28	Camberwell	25-53 (odd) Camberwell Church Street	50%	36%	10%	10%
		55-75 (odd) Camberwell Church Street				
		30-58a (even) Camberwell Church Street				
		2-14 (even) Grove Lane				
		45-81 (odd) Denmark Hill				
		2-8a (even) Coldharbour Lane				
		10-16 (even) Coldharbour Lane				
		334 - 356 (even) Camberwell New Road				
SF29	Vestry Road	76-88 (even) Vestry Road	50%	75%	0%	0%
SF30	Peckham	2-10 (even) Blenheim Grove	50%	48%	16%	5%
		3, 4, 5, 10, 12 & 14 Station Way, Rye Lane				
		2-38 (even) Peckham High Street				
		176-188 (even) Lambrook House, Peckham High Street				
		1-51 (odd) Peckham High Street				
		151-175 (odd) Peckham High Street				

		59-77 (odd) Peckham High Street				
		91-107 (odd) Peckham High Street/Peckham Hill Street				
		109-149 (odd) Peckham High Street				
		143-165 (odd) Peckham Hill Street				
		177-235 (odd) Rye Lane				
		249-265 (odd) Rye Lane				
		275-295 (odd) Rye Lane				
		152-204 (even) Rye Lane				
		206-232 (even) Rye Lane				
		24-68 (even) Peckham Rye				
		2-4 (even) Atwell Road				
		2-46 (even) Choumert Road				
		1-7 The Market (odd) Choumert Road				
		1-7 Choumert Road				
		126-130 (even) Peckham Hill Street				
		1-7 (odd) Blenheim Grove				
SF31	Queens Road	151-193 (odd) Queens Road	50%	29%	7%	36%
SF32	Bellenden Road	113-163 (odd) Bellenden Road	50%	59%	5%	11%
		168-196 (even) Bellenden Road				
SF33	Gibbon Road	2-22 (even) Gibbon Road	50%	33%	0%	27%
		46-64 (even) Gibbon Road				

SF34	Evelina Road, Nunhead Green and Kirkwood Road	2, 2a, 2b Kirkwood Road and 116-122 (even) Evelina Road	50%	47%	11%	11%
		111-133 (odd) Evelina Road				
		135-147 (odd) Evelina Road and 40-44 (even) Nunhead Green				
		24-38 (even) Nunhead Green				
		88 - 106 (even) Evelina Road				
SF35	Grove Vale	21-53 (odd) Grove Vale	50%	54%	13%	5%
		24-56 (even) Grove Vale				
		1-9 (con) & 2a - 12 (con) Melbourne Grove				
SF36	East Dulwich Road	34-60 (even) East Dulwich Road	50%	38%	8%	15%
SF37	Crosswaithe Avenue	6-20 (even) Crossthaite Avenue	50%	100%	0%	0%
SF38	Lordship Lane	117-131 (odd) Lordship Lane	50%	50%	13%	3%
		133-155 (odd) Lordship Lane				
		157-171 (odd) Lordship Lane				
		116 - 134 (even) Lordship Lane				
		201 - 211 (odd) Lordship Lane				
SF39	North Cross Road	33-65 (odd) North Cross Road	50%	52%	7%	0%
SF40	Herne Hill	63-77 (odd) Herne Hill	50%	57%	0%	14%

SF41	Half Moon Lane	1-27a (odd) Half Moon Lane	50%	59%	0%	0%
		2a-6 (even) Half Moon Lane				
		12-24 (even) Half Moon Lane				
SF42	Norwood Road	15-87 (odd) Norwood Road	50%	48%	4%	9%
SF43	Dulwich Village and Calton Avenue	25-49 (odd) Dulwich Village	50%	62%	0%	0%
		1a-1d (con) Calton Avenue				
SF44	Dulwich Village	73-91 (odd) Dulwich Village	50%	35%	6%	0%
		70-98 (even) Dulwich Village				
SF45	Lordship Lane	351-379 (odd) Lordship Lane	50%	57%	11%	11%
		383-401 (odd) Lordship Lane				
		338-366 (even) Lordship Lane				
SF46	Forest Hill Road	2-46 (even) Forest Hill Road	50%	45%	14%	5%
SF47	Forest Hill Road	92-126 (even) Forest Hill Road	50%	29%	18%	6%
SF48	Lordship Lane	481-533 (odd) Lordship Lane	50%	58%	0%	26%
SF49	Croxted Road and Park Hall Road	2-12 (even) Croxted Road	50%	58%	17%	0%
		80-96 (even) Park Hall Road				

SF50	Seeley Drive	30-41 (con) Seeley Drive	50%	70%	10%	10%
SF51	Nunhead Grove and Nunhead Lane	60-66 Nunhead Grove and 2-8 Nunhead Lane	50%	43%	14%	0%
SF52	Camberwell New Road	223 - 153 (odd) Camberwell New Road	50%	19%	34%	6%

## Appendix 3 – Key Applications

### Canada Water Masterplan

Reference	18/AP/1604
Town Centre	Canada Water Major Town Centre
Proposal Summary	Hybrid planning application for the comprehensive mixed-use redevelopment of the site for a wide range of uses. Full planning permission is sought for the first phase of the development – Plots A1, A2 and K1 – and outline planning permission is sought (with all matters reserved) for the remaining areas.
Existing A1-A5 sqm	35,435
Proposed A1-A5 sqm	46,452-88,432
Net A1-A5 sqm	<b>11,017-52,997</b>
Decision	Granted by committee
Site Allocation	NSP78: Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close

### Elephant and Castle Shopping Centre

Reference	16/AP/4458
Town Centre	Elephant & Castle (including Walworth Road) Major Town Centre
Proposal Summary	Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys.
Existing A1-A4 sqm	15,132
Proposed A1-A4 sqm	18,234
Net A1-A4 sqm	<b>3,102</b>
Net Flexible use A1-A4/B1	<b>2,806</b>
Decision	Granted with legal agreement
Site Allocation	NSP45: Elephant & Castle Shopping Centre and London College of Communication



### Aylesham Shopping Centre

Reference	N/A
Town Centre	Peckham Major Town Centre
Proposal Summary	Redevelopment of Aylesham Shopping Centre
Existing Retail sqm	11,420
Indicative Net Town Centre Uses sqm	<b>7,000*</b>
Decision	n/a
Site Allocation	NSP71: Aylesham Centre and Peckham Bus Station

### Tower Bridge Business Complex

Reference	17/AP/4088
Town Centre	N/A
Proposal Summary	A hybrid application to develop the former Peek Frean biscuit factory and adjoining former Lewisham and Southwark College campus site close to Bermondsey underground station.
Existing A3 (sqm)	288
Proposed A1/A3/A4 (sqm)	3795
Proposed A1/A3/A4/D1 (sqm)	3882
Proposed Outline A1/A3/A4/D1/Sui Generis (sqm)	781
Net Town Centre Uses (sqm)	<b>8170</b>
Decision	Refused**
Site Allocation	NSP10: Biscuit Factory and Campus

\*The Southwark Retail Study Old Kent Road update retail floorspace capacity forecasts a net increase of up to 7000 sqm at Aylesham Centre in 2026. Up to 2,100sqm gross of this projected floorspace is food and beverage floorspace; and up to 4,900 is forecast as comparison goods floorspace.

\*\*Although this application has been refused, this proposal gives an indication of the potential capacity for retail floorspace within this site.

## Appendix 4 – Percentage of A1 Uses in Protected Shopping Frontages by year

NSP Schedule ID	Name	Years	
		2018	2017
SF1	Peckham	73%	82%
SF2	Walworth Road	60%	75%
SF3	Camberwell	47%	64%
SF4	Lordship Lane	49%	53%
SF5	The Blue	51%	94%
SF6	Hopton Street	40%	39%
SF7	The Cut	38%	39%
SF8	Borough High Street	13%	39%
SF9	Waterloo Road	33%	39%
SF10	Great Suffolk Street	53%	39%
SF11	Snowsfields and Weston Street	39%	38%
SF12	Colechurch House	67%	38%
SF13	Hay's Galleria	44%	38%
SF14	Tooley Street	33%	38%
SF15	Bermondsey Street	27%	38%
SF16	Dockhead	50%	50%
SF17	Jamaica Road	54%	85%
SF18	Jamaica Road	43%	44%
SF19	Albion Street	50%	46%
SF20	Harper Road	50%	58%
SF21	Tower Bridge Road	41%	55%
SF22	Lower Road and Plough Way	35%	43%
SF23	Walworth Road, East Street and Camberwell Road	58%	73%
SF24	Old Kent Road, East Street and Dunton Road	40%	52%
SF25	Ilderton Road	55%	45%
SF26	Maddock Way	63%	78%
SF27	Peckham Park Road and Old Kent Road	35%	50%
SF28	Camberwell	36%	63%
SF29	Vestry Road	75%	45%
SF30	Peckham	48%	63%
SF31	Queens Road	29%	50%
SF32	Bellenden Road	59%	55%
SF33	Gibbon Road	33%	33%
SF34	Evelina Road, Nunhead Green and Kirkwood Road	47%	63%
SF35	Grove Vale	54%	63%
SF36	East Dulwich Road	38%	43%
SF37	Crosswaithe Avenue	100%	100%
SF38	Lordship Lane	50%	67%

SF39	North Cross Road	52%	71%
SF40	Herne Hill	57%	25%
SF41	Half Moon Lane	59%	67%
SF42	Norwood Road	48%	67%
SF43	Dulwich Village and Calton Avenue	62%	59%
SF44	Dulwich Village	35%	47%
SF45	Lordship Lane	57%	40%
SF46	Forest Hill Road	45%	65%
SF47	Forest Hill Road	29%	48%
SF48	Lordship Lane	58%	39%
SF49	Croxted Road and Park Hall Road	58%	58%
SF50	Seeley Drive	70%	75%
SF51	Nunhead Grove and Nunhead Lane	43%	70%
SF52	Camberwell New Road	19%	43%

## Appendix 5 – London Development Database Analysis

### Monitoring changes in retail (A class) development

The following tables show changes A1 floorspace since the adoption of the Core Strategy in 2011. Use Class A1 is defined as shops and retail outlets.

The data shows both net and gross data. Net data takes account of any demolished retail space on the site of a completed development, and gross data only counts the newly-built floorspace.

The data is also shown in terms of completions and approvals. Completions log the year the developments are completed and approvals log the year the developments were approved.

Both tables will contain some of the same application data but due to length of time some developments take to build, the completions table includes approvals from as early as 2006 for example. The approvals data shows any planning applications that were permitted in any given year and could include schemes that are currently under construction or completed. Planning applications that have expired are excluded from the data. Around 7.7% of applications involving A1 use floorspace have expired over the last 10 years, so there is not a particularly high lapse rate of applications.

### London Development Database

The primary source of the council's development data is the London Development Database (LDD). Although the LDD is owned and managed by the Greater London Authority, it is the responsibility of the borough to input the correct data about planning applications approved within their boundaries.

Boroughs are required to record information about all planning permissions on the LDD which do one of two things. As a result of an approved planning application, this is where there is either:

- a net change in the number or type of residential units on a site, or
- a net change of 1000sqm or more of non-residential floorspace

It is at the discretion of the boroughs to include applications where there are net changes of non-residential floorspace below 1000sqm. Generally data officers at Southwark Council record smaller schemes to provide more effective monitoring data however it may not capture every small site (particularly if no housing was proposed). The data provided below is therefore given in terms of schemes with a threshold of over 1,000sqm (mandatory data) and over 0sqm (including some voluntary data).

It must be caveated that figures derives using the threshold of 'over 0sqm' may not be a fully accurate reflection of smaller scale changes in non-residential floorspace Therefore, interpreting LDD data when using smaller amounts of non-residential floorspace should be done with caution.

## Completions

In the period 2011-2018 there has been a **net gain of around 28,400sqm of A1 floorspace through completions**. A significant proportion of the A1 floorspace delivered has been contributed by major schemes completed between the financial years 2014/15 and 2016/17. In particular, Bermondsey Spa (09/AP/0519) delivered 1452 sqm net in the financial year 2014/15; and Century House (09/AP/1617) delivered 1470 sqm net in the financial year 2015/16.

The financial year 2016/17 had the highest level of net gain in A1 floorspace (7,189 sqm) through completions. In this year three major schemes contributed to this delivery: Castle Industrial Estate (09/AP/2403) 2232 sqm net; Kings Reach Tower (11/AP/1071) 3701 sqm net; and 180 Brandon House (11/AP/2012) 1460 sqm net.

The completion of applications delivering over 1,000 sqm net (and gross) of A1 floorspace has contributed significantly to meeting the demand of retail floorspace in the borough. However, the majority of net gain in A1 floorspace is delivered through development proposing less than 1,000 sqm of net floorspace. Completions data show that across the period, **11,825 sqm net** of A1 floorspace was delivered through applications proposing over 1000 sqm of A1 floorspace, whilst **16,577 sqm net** was delivered through applications proposing less than 1000 sqm of A1 floorspace.

This trend is best typified in the financial year 2018/19, 1560 sqm of A1 floorspace was delivered through the completion of applications proposing more than 1000 sqm and 5396 sqm was delivered through the completion of applications proposing less than 1000 sqm.

Completions		
	Over 0sqm	
Year	A1 (net)	A1 (gross)
FY 2011/12	1901	3361
FY 2012/13	2688	5136
FY 2013/14	750	2,352
FY 2014/15	3878	5,626
FY 2015/16	4053	5,008
FY 2016/17	7189	9,129
FY 2017/18	987	2,561
FY 2018/19	6956	10,163
<b>Total</b>	<b>28402</b>	<b>43,336</b>

Completions		
	Over 1000sqm	
Year	A1 (net)	A1 (gross)
FY 2011/12	1,105	1105
FY 2012/13	1361	1361
FY 2013/14	0	0
FY 2014/15	1,452	1452
FY 2015/16	2646	2,646
FY 2016/17	3,701	3701
FY 2017/18	0	0
FY 2018/19	1,560	3560
<b>Total</b>	<b>11825</b>	<b>13,825</b>

## Approvals

In the period 2011-2018 there has been a **net gain of around 35,500 sqm of A1 floorspace through approvals.**

A significant proportion of the A1 floorspace in the pipeline has been contributed by major schemes approved in the financial years 2011/12, 2013/14, 2016/17 and 2018/19. In the 2011/12 financial year the following application was approved Kings Reach Tower (11/AP/1071) delivering 3701 sqm net. In the 2013/14 financial year the following applications were approved: Decathlon and What (12/AP/4126) delivering 5037 sqm net and 180 Brandon House (11/AP/2012) delivering 1460 sqm net. In the financial years 2016/17 and 2018/19, respectively, the redevelopment of Bank End (15/AP/3066) will deliver 2795 sqm net and Elephant and Castle Shopping Centre (16/AP/4458) will deliver 1336 sqm net.

Similarly to completions over the same period, most of the A1 floorspace being delivered through the approvals has been through applications delivering less than 1000 sqm of A1 floorspace. Approvals data shows that across the period, **16,501 sqm net** of A1 floorspace was delivered through applications proposing over 1000 sqm of A1 floorspace, whilst **19,017 sqm net** was delivered through applications proposing less than 1000 sqm of A1 floorspace.

This table does not include a recently approved scheme, Canada Water Masterplan which has been approved for Phase 1 and outline planning permission for future phases of the redevelopment of this site. The approved application seeks to deliver up to 88,432 m<sup>2</sup> (gross) of retail (Class A) across the Masterplan site, with a commitment to a minimum provision of 46,452m<sup>2</sup>.

Approvals		
	Over 0sqm	
Year	A1 (net)	A1 (gross)
FY 2011/12	7975	12,428
FY 2012/13	4358	6906
FY 2013/14	8309	20,761
FY 2014/15	2352	5517
FY 2015/16	2764	4315
FY 2016/17	5378	10,155
FY 2017/18	2146	3,649
FY 2018/19	2236	11,531
<b>Total</b>	<b>35,518</b>	<b>75,262</b>

Approvals		
	Over 1000sqm	
Year	A1 (net)	A1 (gross)
FY 2011/12	6338	8838
FY 2012/13	1632	3,350
FY 2013/14	4669	14848
FY 2014/15	-1252	0
FY 2015/16	945	1025
FY 2016/17	2823	4907
FY 2017/18	0	0
FY 2018/19	1346	8251
<b>Total</b>	<b>16,501</b>	<b>40,719</b>