

# Barnet Local Plan EIP – Note on Town Centres – Terminology and Uses

## Reason for producing this Note

On Day 2 (Wednesday 21<sup>st</sup> September) of the hearing sessions under consideration of Matter 2, Spatial Strategy and Strategic Requirements, Inspector Wildgoose requested a note on town centres which at the least would address: to :

- References made throughout the Local Plan, including updates and amendments where necessary;
- Ensure there is a consistency of interpretation throughout the Plan and relation to the London Plan in order to avoid any terminology which might misleading in terms of categorisation of District Town Centres on the London and Local Plan.;
- Whether Policy GSS08 can or should become more reflective of the definition of town centres, having particular regard to what is appropriate in what location; and,
- The requirements of national and local policy, in particular NPPF Chapter 7.

## Background

Policy GSS08 within Chapter 2 (Growth & Spatial Strategy) and the suite of four policies (TOW01 – TOW04) in the Town Centres Chapter 7 of the Reg 19 Draft Plan are of particular relevance in this regard.

The following are also of relevance:

- The definition given of ‘main town centre uses’ provided in the glossary (Appendix B of the Plan), namely:  
*“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).”*
- Table 24 – Monitoring Indicators within Chapter 12 Delivering the Local Plan which includes the following two indicators in respect of town centres:

Key Performance Indicator	Policy	Target	Source of Monitoring Information
Town centres, local centres and parades – trends within Barnet’s town centres, local centres and parades	TOW02: Development Principles in Barnet’s Town Centres, Local Centres and Parades	No significant reduction in Commercial, Business and Service Use Class floorspace within primary frontages	Planning database Retail surveys
Clustering of specific town centre uses - Hot Food Takeaways, Adult Gaming	TOW03: Managing Hot Food Takeaways, Adult	All new Hot Food Takeaways meet the	Planning database Retail surveys, Public Health team

Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars	Gaming Centres, Amusement Arcades, Betting Shops, Payday Loan Shops, Pawnbrokers and Shisha Bars	Healthier Catering Commitment No proposals refuse to demonstrate evidence of health impacts through a Health Impact Assessment	
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Proposed Main Modification 17 (Exam 4) [EXAM 4 - Table of Council's Proposed Modifications to Barnet's Draft Local Plan - June 27th 2022 PDF \(2.35MB\) 0.pdf](#) outline a small number of mainly minor clarificatory revisions to the submitted draft of the Local Plan in respect of the policies and supporting text to GSS08 and TOW01 to TOW04.

## Consideration

To avoid confusion the Council accepts that it is necessary to review references made throughout the Plan to “Main Town Centres” and thereby ensure consistency about the town centre hierarchy and what are considered to be main town centre uses.

The National Planning Policy Framework (the Framework) includes a chapter on town centres (see paras 86 to 90) –together with definitions of what a town centre is and what are considered to be ‘main town centre uses’ in the glossary. (to which Appendix A of this Note refers)

The London Plan provides descriptive definitions for each category of centre, outlining the typical role and characteristics of each, including qualifying quantum of floorspace for different town centre uses. The section in the London Plan on the town centre network set out in the London Plan (Core\_Gen\_16) together with the definition provided of a Town Centre (Annex 3 Glossary) to be read alongside the detailed Annex 1 and which sets out London’s town centre network hierarchy is particularly relevant to the London boroughs.

In respect of Barnet, - Table A1.1 in Annex 1 of the London Plan identifies one major centre (Edgware), fourteen District Centres and also Brent Cross with future potential to be classified as a Metropolitan Centre. For ease of reference Appendix A of this Note summarises the hierarchical categorisation of town centres and main town centre uses set out in the published London Plan in so far as this is relevant to Barnet.

The Council’s Town Centre Floorspace Needs Assessment (EB\_E\_02), produced pre COVID and the Use Class Order changes), found that one of the District Centres, Colindale / The Hyde, was performing more like a local centre. However, for this iteration of the Barnet Local Plan no deviation from the London Plan town centre network categorisation of Barnet centres is envisaged. Whilst currently actively monitoring immediate general impacts, the Council considers that it is too soon in this iteration of the Local Plan meaningfully to assess and quantify impacts arising from the COVID 19 pandemic, the Government’s changes made to the Use Classes Order in 2020 and the subsequent expansion of Permitted Development Rights in 2021.

Therefore, reflecting on the Inspector’s comments, and having had regard to:

- i) the relevant section and glossary references made in the Framework;
- ii) the Government’s Planning Practice Guidance;
- iii) the published London Plan (Core\_Gen\_16) and

- iv) representations made in respect of the Barnet Plan at Regulation 19 publication stage, together with the subsequent suite of signed Statements of Common Ground,

The Council considers a number of additional modifications to the Plan are necessary as listed in Appendix B of this Note. This is to avoid any confusion in terms of categorisation of centres meant by adhering to the London Plan terminology in this respect clarifying that Policy GSS08 relates specifically to Barnet's 14 District Centres. Consequently, the Council believes that in addition to the proposed modifications already identified (EXAM 4), further modifications are necessary.

The Council is satisfied that Policy GSS08, together with the suite of four policies in the Town Centres chapter of the Plan, when read together with the proposed modifications (EXAM 4 supplemented with Appendix B of this Note) are sufficiently reflective of the definition of town centres when having particular regard to what is appropriate in the particular location. Also, that taken together with relevant policies in the London Plan, the Barnet Local Plan as drafted provides sufficient clarity with regards to 'main town centre uses' and therefore fully meets and accords with the requirements set out in national policy and guidance.

### **Conclusion**

A list of proposed main modifications (EXAM 4), as amended and supplemented by those outlined in Appendix B of this Note. has been produced in order to provide further clarify and ensure

- i) consistency with the London Plan and
- ii) internal consistency throughout the draft Barnet Local Plan.

## Appendix A

### i) The Framework

The NPPF (Core\_Gen\_33) includes Chapter 7 titled Ensuring the vitality of town centres. Paragraph 86 states that planning policies should:

- a) Define a network and hierarchy of town centres and promote their long-term vitality and viability – allowing them to grow and diversify in a way that is responsive to rapid changes in retail and leisure and which allows a suitable mix of uses, including housing, reflecting their distinctive character.
- b) Define the extent of town centres and primary shopping areas making clear the range of uses permitted.
- c) Retain and enhance existing markets and as appropriate re-introduce / create new ones.
- d) Allocate a range of suitable town centre sites to meet the scale and type likely to be needed looking at least 10 years ahead and where necessary keeping town centre boundaries under review
- e) Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of sites cannot be identified, then consider how identified needs might be met in other accessible locations well connected to town centres.
- f) Recognise important role residential development often plays in ensuring the vitality of centres and encourage residential development on appropriate sites.

Paragraphs 87 and 88 of the Framework refers to the application of the sequential test to planning applications for main town centre uses.

Paragraph 90 outlines the circumstances where in assessing applications for retail and leisure developments not in accord with an up to date local plan an impact assessment is required.

In Annex 2 of the Framework Glossary a Town Centre is defined as:

“Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.”

Main town centre uses are defined 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).

### ii) Government’s National Planning Policy Guidance

The town centres and retail section provides additional guidance on planning for retail and other town centre uses.

### iii) Changes to the Use Classes Order and Permitted Development Rights changes

These changes are already noted in the Regulation 19 publication draft of the plan (e.g. paras 7.2.5 to 7.2.8). The proposed main modifications (EXAM 4) however also includes revisions (MM191 and MM194) that serve to update and provide additional clarification with regards to these changes introduced by the Government during 2020 and 2021.

### iv) London Plan

The Annex 3 Glossary in the London Plan defines Town Centres as:

“Places in London that provide access to a range of commercial, cultural and civic activities, including shopping, leisure, employment, entertainment, culture, and social and community facilities. Town centres are classified in the London Plan according to their existing role and function in light of characteristics such as scale, mix of uses, economic performance and accessibility – see Annex 1.”

#### Annex 1 Town Centre Network

Table A1.1 in the London Plan, Town Centre Network and Future Potential Network Classification, classifies London’s larger town centres into five categories of which the following three are relevant to Barnet: Metropolitan, Major and District centres. Table A1.1 also identifies those centres that may have the potential to be re-classified in the future (London Plan Policy SD8 Town centre network refers).

In addition, the London Plan makes reference to Local and Neighbourhood centres throughout London, which may be designated in Local Plans. This classification provides a hierarchy, recognising the different size and draw of town centres.

Of relevance to Barnet’s centres, the different roles in the network are:

- **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 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.
- **Major centres** – typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.
- **District centres** – distributed more widely than Metropolitan and Major 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 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.
- **Local and Neighbourhood 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 sqm), sub-post office, pharmacy, laundrette and other useful local services. Together with District centres they can play a key role in addressing areas deficient in local retail and other services.

### Night-time Economy Classification

These centres have a strategic night-time function involving a broad mix of activity during the evening and at night, including most or all of the following uses: culture, leisure, entertainment, food and drink, health services and shopping. See London Plan Policy HC6 Supporting the night-time economy and Figure 7.6 for details.

They are classified into three categories:

- NT1 – Areas of international or national significance
- NT2 – Areas of regional or sub-regional significance
- NT3 – Areas with more than local significance

### Commercial Growth Potential

Table A1.1 provides strategic guidance on the broad future direction envisaged for the Metropolitan, Major and District centres including their possible potential for commercial growth (uses falling within the A, B, D and SG Use Classes). Three broad categories of future commercial growth potential have been identified:

- High growth – includes town centres likely to experience strategically-significant levels of growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6).
- Medium growth – includes town centres with moderate levels of demand for retail, leisure or office floorspace, and with physical and public transport capacity to accommodate it.
- Low growth – town centres that are encouraged to pursue a policy of consolidation by making the best use of existing capacity, either due to (a) physical, environmental or public transport accessibility constraints, or (b) low demand.

### Residential Growth Potential

All town centres have potential for residential growth, either within or on the edge of the town centre. Table A1.1 provides strategic guidance for the relative potential for residential growth for the International, Metropolitan, Major and District centres and CAZ retail clusters, indicating whether they would be likely to be able to accommodate high or medium levels of residential growth, or incremental residential development. This is a broad strategic-level categorisation that has been informed by the SHLAA and Town Centre Health Check, and takes into consideration the potential for impacts on heritage assets.

The London Plan states that boroughs should be planning proactively to seek opportunities for residential growth in and around town centres, in particular using the mechanisms set out in Policy SD7 Town centres: development principles and Development Plan Documents, informed by detailed assessments of town centre capacity and complementing approaches set out in town centre strategies.

### Office Guidelines

Table A1.1 and Figure A1.4 set out those town centres where specific approaches to offices are recommended, as informed by the London Office Policy Review and borough evidence.

- A. Speculative office potential – These centres have the capacity, demand and viability to accommodate new speculative office development.

- B. Mixed-use office potential – These centres have the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use.
- C. Protect small office capacity – These centres show demand for existing office functions, generally within smaller units.

Centre	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration
Edgware	Major			Low	Medium	Yes	
Brent Street	District			Low	Medium		
Chipping Barnet	District		NT3	Low	Medium	C	
Church End, Finchley	District			Low	Medium	C	
East Finchley	District			Low	Medium		
Golders Green	District			Low	Incremental		
Hendon Central	District			Low	Medium		
Mill Hill	District			Low	High		
New Barnet	District			Low	Medium		
North Finchley	District		NT3	Low	High	C	
Temple Fortune	District			Medium	Incremental		
Whetstone	District			Low	Medium	C	
Colindale/ The Hyde Barnet/ Brent	District			Low	High		
Cricklewood Barnet/ Brent/ Camden	District		NT3	Medium	High		Yes
Burnt Oak Barnet/ Brent/ Harrow	District			Low	High		Yes
Brent Cross	Unclassified*	Metropolitan		High	High	A/ B	Yes

**Table A1.1 - Town Centre Network**

\*Centre with Future Potential Network classification

## Appendix B

### Further Proposed Main Modifications

It is suggested that the following additional changes are made to Barnet Local Plan:

- Para 4.18.4 add reference to London Plan town centre categorisation so to read: “Edgware is identified in the London Plan town centres hierarchy as Barnet’s only Major Centre and is also identified in the Growth Strategy as one of Barnet’s main town centres, a location prioritised.....”
- Replace MM95 and instead add to the start of supporting text para 4.21 Barnet’s Growth Strategy highlights those town centres (Burnt Oak, Chipping Barnet, Edgware, Finchley Church End (Finchley Central), Golders Green and North Finchley) that have been prioritised, for improving the town centre offer.
- Replace MM96 and instead add to 2<sup>nd</sup> para of Policy GSS08 “In addition to the Major Centre of Edgware, there are 14 District Centres identified within Barnet in the London Plan – of these Burnt Oak, Chipping Barnet, Finchley Church End (Finchley Central) , Golders Green and North Finchley will form the Council’s priorities for investment .....
- Delete reference to “Main Town Centres” in policy GSS08 to avoid confusion in terms of the London Plan town centre network hierarchy terminology.
- Paras 4.21.4 and 4.21.5, amend these references to Barnet’s town centres to read “Barnet’s District Centres ...”
- Paras 4.21.6 and 4.21.7 amend to read “Within District town centres .....” and “Barnet’s District town centres ...”
- Within Policy GSS08
  - i) “Barnet’s District Town Centres .....”
  - ii) “The Council will support mixed use development within Barnet’s District town centres ....”
  - iii) “Barnet’s District Town Centres (excluding Cricklewood ~~and Edgware~~) have potential to deliver .....”
  - iv) “The Council will ensure that proposals for District town centre development .....”
  - v) “The Council will pursue the individual planning objectives for each District ~~town~~ centre through .....”
- Within Policy TOW01
  - i) in first sentence of policy “..... by managing in accordance with the London Plan classification, a strong hierarchy of town centres .....”
  - ii) in respect of Edgware in part a ii) of the policy amend last sentence to read: “New housing will also form a key part of significant growth of the local economy of this Major Centre.”
  - iii) in respect of Cricklewood amend part a iii) of the policy to read “Cricklewood District Centre .....”
  - iv) amend to read “Other District ~~Town~~ Centres ....”