

**Appendix 2. Managing Change of Use in Local Shopping Centres Representations with responses and associated action prepared in accordance with Regulation 18(4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004**

Name/Organisation	Section	Response	Officers' response
Dr Anthony Jelley	Shopping Quotas Key Principle - 1	If the planners feel these new quotas would promote a variety of independent shops and prevent takeaway outlets, estate agents etc from becoming predominant in neighbourhood parades, I give my support. I would like to see all neighbourhood parades flourish, with a good variety of uses, including food, drink, convenience, boutiques, professional services (offices etc).	Comments noted. No change necessary.
Dr Anthony Jelley	Neighbourhood Parades	I would like the planners to show some flexibility towards neighbourhood parades, especially in the growth of new parades in newly emerging neighbourhoods. If new parades begin to emerge in the borough's regeneration areas, I would like them to have an opportunity and encouragement to grow and adapt organically to meet emerging demands. For instance, in the SFR regeneration area, if restaurants, cafes and independent boutiques, food shops and art studios etc in the general vicinity of the riverside prove popular with residents and visitors, especially in conjunction with the farmers' markets that the Council wishes to encourage there, I would like to see the provision of those facilities given the flexibility to develop organically in the emerging direction. I support the councils plan to promote new shopping facilities and art studios within the SFR regeneration area, but I feel that market forces and human behaviour ought to play a part in the extent and direction of their growth. However, developers should nevertheless be required to make a baseline provision of these facilities available from the outset, but future growth should not be initially hindered or discouraged by planning policies or the developers desire to limit provision due to higher potential profits to be made on residential development.	Comments noted. The Core Strategy allows for further retail provision in regeneration areas. No change necessary.
Coal Authority	General	Thank you for consulting The Coal Authority on the above.  Having reviewed your document, I confirm that we have no	No change necessary.

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		<p>specific comments to make on this document at this stage.</p> <p>We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address <a href="mailto:planningconsultation@coal.gov.uk">planningconsultation@coal.gov.uk</a>, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.</p> <p>Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison.</p> <p>Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).</p>	
Real Flame	General	As a business in a shopping parade and also as local residents my partner in the business and I fully support these proposals.	Support noted. No change necessary.
Mr Anthony Williams	General	<p>I support the hierarchical approach and thinking behind it, and the proposed control of uses in each category.</p> <p>I am unclear, however, as to how the proposed allocations have been made as there are considerable differences in scale in the various locations grouped in each category. For example, to classify Parsons Green and Wandsworth Bridge Road (South) as equal does not make sense to me. Should there be four categories not three?</p>	Comments noted. More information regarding how the local centres were categorised is contained within the council's Shopping Hierarchy Background Paper 2010. No change necessary.
Mr Anthony Williams	Neighbourhood Parades	I strongly oppose the inclusion of Wandsworth Bridge Road (South) as a neighbourhood parade. Its position close to the Wandsworth Bridge traffic lights, traffic congestion due to parking and the bus lane, and the proposed intensification of riverside use as detailed in the draft South Fulham Riverside SDP which includes retail uses, all make this an unacceptable location for classification as a retail centre. More restrictive planning measures	Comments noted. There has been a designated shopping centre in this location for many years. The existing shopping hierarchy was subject to consultation as part of the Core Strategy DPD which was found sound by an Independent Inspector in July 2011. No change necessary.

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		would be more appropriate.	
English Heritage-London Region	General	<p>We have reviewed the SPD and can advise that we support the management of use where this is done to maintain the character and local distinctiveness of local shopping centres, and to support the conservation and enhancement of heritage assets, such as conservation areas.</p> <p>It must be noted for the avoidance of doubt that this letter is based on the information provided by you and does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from, or relate to this or later versions of the SPD, and which may have adverse effects on the environment regardless of any sustainability appraisal.</p>	Comments Noted. No change necessary.
Theatres Trust	General	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and having looked at the document we find this consultation is not directly relevant to the Trust's work. We therefore have no comment to make but look forward to being consulted on further planning policy documents in due course.	Comments Noted. No change necessary.
June Bennett	General	<p>Seeing so many shops empty in the borough is serious ands to be addressed.</p> <p>Most important point - employment, opportunities for local community to be involved &amp; places for constructive activities to take place.</p> <p>Local people must be involved in the decisions to be made.(Fulham Rd new Sainsburys although some of us are very sad to see it and wonder the affect on our local small but very helpful private shops.)</p>	Comments noted. Consultation will take place on individual planning applications as appropriate. No change necessary.
June	Local Shopping Centre Quotas	6.2	Comments noted. Many of the matters raised are considered by the council. No change

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Bennett		<p>* Pavements must be wide enough and step free where cafes and restaurants are to open.</p> <p>* If use of pavement is allowed the area must be made safe for blind and partially sighted.</p> <p>* Room must be wide enough for wheel chair and elderly to safely pass the sitters.</p> <p>* Where Cab Offices are allowed they should not be allowed to park outside on yellow lines or at meters without paying as is seen on Lillie road and outside the school.(There is a very dangerous cord hanging down by the side of the Cab Office in Beadon Rd that blows out into the path in windy weather - is it linked to their satellite?)</p> <p>* With obesity and excessive drinking becoming a problem places selling food or drink should not be allowed near schools or in areas where is an already known problem</p>	necessary.
June Bennett	Local Shopping Centre Quotas	<p>6.4/5 &amp; 6.6.</p> <p>* I would like to see shops, as seen elsewhere, that cater for a meeting place for mothers &amp; children in mornings or afternoon selling light refreshments and catering for birthday parties &amp; other activities.</p> <p>* Similar places for older people and others to obtain advice and to socialize.(Askew Library good example.)</p> <p>* Simple exercise opportunities for different ages depending on where and local need.</p> <p>* Activity areas in doors for young school leavers where there are no youth clubs or parks could also provide guidance on seeking jobs - chance for 3rd sector at reduce rate if shop left empty long time.(Disgraceful how long a house at junction of Woodlawn Road</p>	Comments noted. No change necessary.

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		and Langthorne St has been empty 30 years in spite of letters from myself and others. Now at last been being rebuilt!)	
June Bennett	Local Shopping Centre Quotas	6.7, 6.8 & 6.9  * Percentage figures will depend on the area, what is already there and what LOCAL people think is needed.	Comments noted. No change necessary.
June Bennett	Criteria for all centres	7. Criteria for all centres.  I agree with your key principles as seen by some of my above comments. These were drafted some weeks ago but in view of the activities over the last week end in North London and central London, thankfully as far as we know not here in our borough, I believe we must seek to provide an occupation, if not work, for our school leavers and other people, especially. This becomes even more urgent as their parents face the cuts being made by the government that will affect state benefits and housing problems.  Having worked here from 1965 to 1995 I saw all the local companies including mine Duckhams and BP close and little has taken their place to offer these unqualified residents employment.	Comments noted. The Core Strategy sets out the council's vision to create a borough of opportunity for all. It is supported by a number of other council strategies that are aimed, for example, at providing a quality education and regenerating the most deprived parts of the borough. No change necessary.
Metropolitan Police Authority/Service	Criteria for all centres	The MPA/S' Estate Strategy highlights the need for front counter facilities and contact points where the public can interact easily with police officers. Local centres, satellite parades, neighbourhood parades and other shopping frontages provide ideal locations for these facilities due to the high levels of footfall. Such policing facilities add to the vitality of local centres by ensuring that an active frontage is maintained as well as providing an increased perception of safety and security across the Borough.  The MPA/S appreciate that it is necessary to have policy support for the retention of A1 units but consider that in circumstances where the percentage is at or near the threshold, it would prohibit the provision of essential community uses such as front counter	The Core Strategy notes that the council will support the Metropolitan Police in providing new facilities, for example in the regeneration areas. In addition, it should be noted that police services are included in the Glossary definition of community uses.  With regard to this SPD, Key Principle 2 allows for the provision of community services and also sets out criteria that will be considered when a proposal is contrary to the quotas. Although the key principle will take into account the nature and characteristics of the proposed use, it is agreed that "need"

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		<p>policing facilities.</p> <p>Mindful of the above, the MPA/S consider that there should be an exception to this policy stating that should the maximum level of non-A1 uses be reached within the key local centres, satellite parades or neighbourhood parades (50%, 50% and 35% respectively), the Council will enable suitable community uses, such as front counter policing facilities to be developed where there is a demonstrable need.</p>	<p>could also be included as a criteria.</p> <p>Amend guidance to add "and evidence of need" into third bullet point.</p>
Environment Agency (London Team)	General	<p>Thank you for consulting us regarding the draft SPD. Having reviewed the document, we have no specific comments to make.</p> <p>However, we would add a general comment that for those local shopping centres which are located in areas at risk of flooding, applications for a change of use which increase the flood risk vulnerability of the development (ie. from office/retail to residential) must be accompanied by a Flood Risk Assessment (FRA).</p> <p>This issue does not necessarily need to be addressed in the draft SPD as it is covered by Planning Policy Statement 25: Development and Flood Risk (PPS25) and by our Flood Risk Standing Advice. However, it remains an important issue for development within local shopping centres.</p>	Comments noted. No change necessary.
Highways Agency	General	No comment	No change necessary.
Julie Hodgess	General	I am the owner of a Shop Unit on King Street. The property has a small frontage and is fairly unusual in that the access to my living accommodation in the maisonette above is routed through the shop door. I would like to be kept informed of future planning proposals.	Comments noted. No change necessary.
Natural England	General	Natural England has no comments to make on this consultation document. Retail provision is a low priority for Natural England. However we would like to stress that the absence of comments or direct involvement on individual plans is simply an expression of	Comments noted. No change necessary.

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		our priorities. It should not be taken as implying a lack of interest or indicating either support for, or objection to, any proposal. The Council should give consideration to enhancing local shopping centres through the provision of suitable and applicable green infrastructure as part of any development; this would comply with PPS 1 and PPS 9.	
Greater London Authority	General	No comment	No change necessary.