



# NIGHT TIME ECONOMY SPD - CONSULTATION REPORT



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# 1. BACKGROUND

## INTRODUCTION

In 2019 the Legacy Corporation (LLDC), as a local planning authority for its area, prepared a draft Nigh-time Economy Supplementary Planning Document (SPD). The SPD was prepared to support the revised Local Plan policies by providing planning guidance with respect to the protection and provision of cultural and night time uses across the whole of the planning area. The SPD provides a specific guidance on the implementation of the Local Plan 2020 policies, particularly in respect to the retail, employment and other main town centre uses. It also sets further centre specific guidance, with the focus on the night time uses, for the five identified town centres plus Stratford High Street.

The SPD went through the formal consultation in Summer 2019 and the final version was prepared in Autumn 2019. The final version of the SPD was anticipated to have been adopted alongside the revised Local Plan in Spring/Summer of 2020. In March, the World Health Organization declared the outbreak of COVID-19 and a global pandemic and the UK went into the first lockdown. The Local Plan was adopted in July 2020 with a commitment to pause the adoption of the Nigh-time Economy SPD in order to review its content to ensure that the supplementary guidance it provides is appropriate in the light of the immediate impacts of the pandemic and its anticipated impacts on town centres.

In response to this, in Winter 2020/21, the Legacy Corporation ran a comprehensive informal consultation with local residents and businesses and organised a series of meetings with key stakeholders to gather anecdotal evidence to understand the extent of the changes and trends occurring at a local level as a consequence of the pandemic. The emerging evidence prepared by the various key organisations such as the Greater London Authority (GLA) were also analysed and taken into account. The review also considered the potential impact of the changes introduced to the Use Classes Order (UCO) on the centres and evening and night-time economy. The information gathered was used to inform additional changes to the final version of the SPD. It is anticipated that the SPD will be adopted in Summer 2021.

## PURPOSE OF THIS REPORT

The Consultation Report summarises the outcome of the informal consultation and the changes that have been made as a result. The representations made in Autumn 2019, during the formal/statutory consultation, and how the LLDC responded to the individual comments is also shown in Appendix 2.

## CONTENT AND THE MAIN PURPOSE OF THE DRAFT NIGH-TIME ECONOMY SPD

The aim of this section is to summarise the purpose of the Evening and Night-time Economy SPD and outline the content of the updated SPD, including the latest changes made to the document in response to the pandemic.

The Local Plan includes policies with respect to the designated town centres that support the development and expansion of cultural uses. In particular, Policy B.2 and Table 4 in the Plan include aspirations for the night-time economy in each of the designated Centres (Stratford; Bromley-by-Bow; Hackney Wick; Pudding Mill and East Village). Other changes relevant to the development of the SPD are policies relating to noise and the 'Agent of Change' principle (BN.12); ensuring space is suitable for a wider range of business needs and the role of workspace in the evening night-time economy (B.1 and B.4); design considerations (BN.4) and a new security policy (S.12). The SPD is intended to provide guidance that will also contribute towards meeting some of the aspirations of other policies in the Local Plan such as S.1 Health and Wellbeing, T.6 Facilitating Local Connectivity and T.7 Transport Assessment and Travel Plans.

The Local Plan also includes a commitment to the production of a SPD for the night-time economy. Producing the SPD presents the opportunity to provide further guidance on the relevant policies set out above and their application to planning for culture and the night time economy. As far as is known, this is the first SPD of its type for some time and coupled with the designation of a Creative Enterprise Zone at Hackney Wick and Fish Island presents an opportunity for the Legacy Corporation to be at the forefront in this area of policy

development in a way that would be applicable in many other parts of London. The further planning guidance for protecting the creative and night-time uses is also becoming increasingly important during the current health crisis and in the post pandemic recovery period.

The Local Plan policies relating to cultural, creative and night time economy uses align with the Mayor of London's objectives as set out within the London Plan (2021) and his Vision for a 24-hour City (2017). Policy HC5 of the London Plan, supports London's cultural and creative industries by protecting existing cultural facilities in town centres. It also encourages the use of vacant properties and land for meanwhile uses and supports and develops creative and cultural industries within Creative Enterprise Zones. Policy D12 also introduces the Agent of Change principle which places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.

The purpose of the SPD can be summarised as:

- Providing specific guidance on the implementation of Local Plan policies, particularly retail, employment and other main town centre uses
- To help create a more diverse and inclusive night time economy within the area, including food and drink, arts and culture, but also for workspace and community space operating into the evening and night-time
- To guide development towards providing a more equitable night time economy reflecting the cultural diversity of London and the LLDC area
- Recognising the role of workspace and community services in the evening and night-time economy
- Providing guidance with respect to some of other issues relating to the coordination of licensing arrangement, wayfinding, design, women safety, management and connectivity
- Ensuring town centres are more flexible to adapt to the changes in the economy or any other unprecedented changes particularly the current health crisis.

It should be noted that SPDs can only provide additional guidance and cannot legally revisit or change the policies within the adopted Local Plan. Therefore, the SPD will need to be read alongside the policies of the Local Plan for which it provides

additional guidance.

Given that the significant time has passed since the SPD consultation version was presented to the Board, Table 1 summarises, overleaf, the content of the SPD by Chapter. The full final version of the SPD is included within Appendix 2 to this report.



**Table 1: Summary of the SPD content**

<b>Chapter</b>	<b>Matters covered</b>
Introductions	Relevant national, regional and local planning and licensing policy including the emerging guidance on the impact of Covid-19 and the recovery of night lif
Policy Context	Defining the Evening and Night-time Economy within the area- to include culture, food and drink uses, extended hours of other uses, workspace and other industries
Current Night-time Economy	Diversity and type of the current night time offer, including types of space uses operate from Potential implications of changes to the Use Classes Order and Potential implications of the changes to the neighbouring uses i.e. employment uses as a neighbouring use changing to residential Women’s Safety considerations – the SPD provides reference to the Mayor of London’s Women’s Night Charter and requires developments to sign up to and implement (in the design and operation of their businesses) the Charter, the SPD also deals with the safety issues through the implementation of the Secured by Design guidance.
What does the future look like?	Changes to the future of the modern town centres that are anticipated to be more flexible, resilient and offer wider array of uses including the function to be used as places to dwell and for social interaction Emerging local changes including undergoing changes at Stratford- East Bank development, International Quarter London, Here East, Retail Extension New centres at Bromley-by-Bow and Pudding Mill.
Diverse and evolving economy	Use of technology to aid data driven decision making Use of live database to record data such as uses, functions and opening times to monitor ongoing changes as well as clusters of activities Protecting community value assets and other creative and culture venues.
General Management Principles	Licensing matters including highlighting policies of the boroughs Wayfinding and security Design considerations including frontages, waste, extraction and outdoor seating Noise and the ‘Agent of Change’ principle.
Stratford Metropolitan Centre	Profile of centre, current night time economy uses and developments coming forward Centre-specific considerations relating to the format of the centre, e.g. Westfield Stratford City. This includes guidance relating to new large scale uses, future expansion of the town centre boundary and more informal evening activities such as festivals and pop-ups Diversification of uses Establishing an effective Stratford Metropolitan Night-time Economy Management Group for the town centre Focus on the crowd management, wayfinding and safety management of the street environment.
Stratford High Street	Profile of the street, current night time economy uses and development coming forward which could change this Guidance in relation to the different locations within this area, e.g. Northern Zone to Stratford High Street Policy Area, SA4.2 LSIS, SA3.4 and types of night time economy uses Specific design considerations, e.g. frontages and ground floor uses. This includes guidance relating to integration of residential and non-residential proposal, wayfinding and safety management of the street environment.

Chapter	Matters Covered
Hackney Wick and Fish Island	<p>Profile of the area and the current night time economy uses and change</p> <p>Centre-specific considerations relating to the format of the centre, in particular how the Agent of Change principle will apply in the context of rapid change, implications of Creative Enterprise Zone proposal, role of interim uses</p> <p>Other potential night-time economy uses outside the centre including workspace. This includes guidance relating to the application of the Agent of Change principle amid change, maintaining current night time economy uses, diversifying the offer and the role of interim uses.</p> <p>Establishing an effective Night-time Economy Management Group for Hackney Wick and Fish Island.</p>
Bromley-by-Bow	<p>Current form of the area and proposed change</p> <p>Centre-specific considerations relating to the format of the centre, e.g. new space coming forward, potential new uses. This includes establishing a Bromley-by-Bow Partnership Group for the future centre management, potential new uses to support the district centre such as a cinema.</p>
East Village	<p>Profile of centre, current night time economy uses and development coming forward</p> <p>Centre-specific considerations relating to the format of the centre, e.g. purpose-built blocks, wayfinding and links to venues. This includes diversifying the offer to provide for local community needs and maintaining vitality in the context of proximity to the Metropolitan Centre.</p>
Pudding Mill	<p>Current form of the area and proposed change</p> <p>Centre-specific considerations relating to the format of the centre, e.g. to form of purpose-built blocks</p> <p>Other potential night-time economy uses outside the centre including workspace. This includes establishing a Pudding Mill Partnership Group for the future centre management, potential new uses to be provided to support a local centre and the role of the 'town square' and interim uses.</p>

# 2. INFORMAL CONSULTATION AND REVIEW OF THE DRAFT NIGHT-TIME ECONOMY SPD

## WHY DID WE GATHER EVIDENCE AND REVIEWED THE DRAFT SPD?

Prior to the pandemic, London's night time economy was worth £26bn a year and employed 1.6 mill. people. In 2019, it was estimated that the night-time economy was the faster growing economy in London. The Mayor has set the ambition that even more can be done to build on this success and throughout a variety of policies, guidance and indicatives he placed all activity between 6pm and 6am placed at the heart of London policy making. However, the pandemic and the subsequently repeated lockdowns have led to a significant damaging impact on the economy. The most significant impact was felt within retail, hospitality, creative, culture and more traditional night time industries as many had to close and only essential stores were allowed to stay open during the lockdowns.

The crisis has also accelerated changes that were already underway in town centres, such as the shift to online shopping, and it has speeded up the general decline of a shopping/retail-centred model of urban form. The reduction of an office based-workforce has also had a direct impact on the footfall within larger town centres across London. On the other hand, it has emphasised how town centres are vital for residents who rely on walking to their nearest centre for everyday essentials, groceries and other services. With more people now working from home and spending time locally, in addition to their retail function, town centres have the potential to become places where people go more frequently to socialise, dwell, work and consume cultural and other services. The crisis has also emphasised the critical importance of providing the appropriate amenities and infrastructure for the night time workers many of whose role was deemed essential during the pandemic.

With the focus now on planning for the recovery of town centres, there is an opportunity to embed these changes to the core function of town centres to ensure that they can adapt to the changing habits and needs and thus continue to thrive in the future.

To respond positively to these rapid changes, the LLDC undertook extensive informal consultation with local residents, business and key stakeholders to understand better how the pandemic has impacted local town centres and the businesses who operate within them. The informal consultation was carried out over a period of three months, between 7 December 2020 and 26 February 2021, to capture the most immediate and emerging changes as well as to allow time for a meaningful conversation with as many relevant stakeholders as possible. It was also acknowledged that the full impact of the pandemic is yet to be seen in the subsequent period. The anecdotal information gathered through the consultation was used to inform changes to the draft Night-time Economy SPD and help it to remain relevant in a post-COVID world.

To determine the scope of the review in relation to the impact of the Covid-19 pandemic the following research, analysis and engagement was carried out:

- A survey was created to engage with local residents to gather their views on how local town centres should respond to the current changes
- A separate survey was created for local businesses to capture their views on the impact of the pandemic and the changes introduced by the new Use Classes Order
- Views were also sought on the general question about the relevancy of the current content of the SPD in the post pandemic times
- One to one meetings were held with a number of key stakeholder such as developers, community groups, BIDs and key retail operators
- A Retail survey was conducted to capture the vacancy rates and set a baseline against which the impact of the changes to the Use Classes Order can be monitored
- Review of planning applications associated with the town centre areas, submitted post-pandemic was made to gather the understanding of the demand for change.



## CONSULTATION METHODS AND ARRANGEMENTS

The informal consultation period entirely fell within the period of national restrictions on travel, public gathering and social distancing imposed by the Government in the wake of the coronavirus pandemic (from 7 December 2020 to 26 February 2021). This also meant that some typical SCI commitments, such as holding face-to-face community consultation events, were not possible and the entire consultation was held online. A variety of media channels and means of communications were used to promote the consultation, including the use of social media, direct emails and a screen message.

The LLDC's planning policy team maintains an extensive consultation database that includes all members of a General Body and Statutory Consultees, local residents and businesses, as well as those who have presented an interest in the area and wish to be kept informed through registration on the consultation database. All those whose details were held on the planning policy consultation database (500 contacts) were individually notified of the consultation including the statutory consultees. Emails were sent individually to all relevant ward councilors encouraging them to further share this with their relevant contacts and local residents. A consultation letter was sent in the run-up to the consultation period to all stakeholders and everyone on the consultation database by post or via email. The letter clearly outlined all the ways in which the representation could be submitted and where more information about the review process could be found. A series of email notifications were sent out to everyone on the consultation database at all other key stages in the consultation process informing and inviting their representations.

Stakeholders and community groups such as Hackney Wick and Fish Island Cultural Interest Group (CIG), Stratford Original BID and Park Panel shared the consultation information with their contacts and promoted the consultation via their communication channels (social media and newsletters). In cooperation with GetLiving, a screen message was placed within all East Village residential entrances (see Figure 3). Two LLDC newsletters sent to the key representatives from each of the main businesses on and around the Park also featured a message about the consultation with the details about how to engage in the survey.

Figure 1: Screen message placed within all residential blocks in East Village



Figure 2: Stratford BID promotion of the SPD review consultation

The image shows a website banner for Stratford Original. At the top left is the logo "STRATFORD ORIGINAL" with the tagline "YOUR BUSINESS IMPROVEMENT DISTRICT". To the right are social media icons for Twitter, Facebook, and YouTube, and a search bar. Below the navigation menu are tabs for "COVID-19", "ABOUT US", "OUR AREA", "NEWS", "EXPLORE STRATFORD", and "MEMBERS". The main banner features a night-time photograph of modern buildings with lights. Overlaid on the bottom half of the image is a dark blue box with the text "NIGHT-TIME ECONOMY SUPPLEMENTARY PLANNING" in large, bold, orange letters. Below this, in smaller white text, is "Review and update of the draft Night-time Economy Supplementary Planning Document" and "14 JANUARY 2021".

In the context of the changes brought about by the current pandemic, the LLDC has initiated a new public consultation to gather evidence for the review and update of the draft Night-time Economy Supplementary Planning Document (SPD). They are seeking the views of locals including local businesses before finalising this planning guidance. You can provide your views following the link [here](#). **The consultation is open until 5pm on Monday 1 February 2021.**

**Useful Links**

- [Draft Night-time Economy Supplementary Planning Document](#)
- [Have your say today](#)



Figure 3: Hackney Wick Cultural Interest Group Newsletter - promotion of the SPD review

The image shows a newsletter layout. At the top is the title "CIG Newsletter" in bold. Below it is a quote: "Working together towards a permanent, sustainable, creative economy in Hackney Wick and Fish Island". A dashed horizontal line separates this from a green button that says "January CIG Notes and Actions". Another dashed horizontal line follows. Below that is a green box with the text "Your opinion is needed:". Underneath is a section titled "Review and update of the draft Night-time Economy Supplementary Planning Document:" followed by a paragraph of text: "The LLDC has initiated a public consultation to gather evidence for the review and update of the draft Night-time Economy Supplementary Planning Document (SPD). They are seeking the views of local residents and businesses before finalising this planning guidance. [Please give your opinion here](#) by Monday 1st February 2021. [Click here](#) for their presentation from January's CIG meeting."

An online consultation platform, Commonplace, was used as the main way to engage and run a survey with the local residents and businesses. This facilitated the consultation process to be carried out online in the wake of the coronavirus pandemic. The platform provided a user-friendly environment, which enabled residents and business to provide their views on a number of key themes including their views on the general role of town centres during and in the post-pandemic times.

As shown in Figure 2, a total of 561 unique visits were made to the online consultation portal and 23 contributions were made, 13 responses were made to the survey for residents, 5 businesses completed the part of the business survey and 5 comments were made on the general scope of the draft SPD. Figures 4 and 5 illustrate visitors per day over the entire duration of the public engagement period.

An extensive one to one engagement was also conducted with the following groups and individuals:

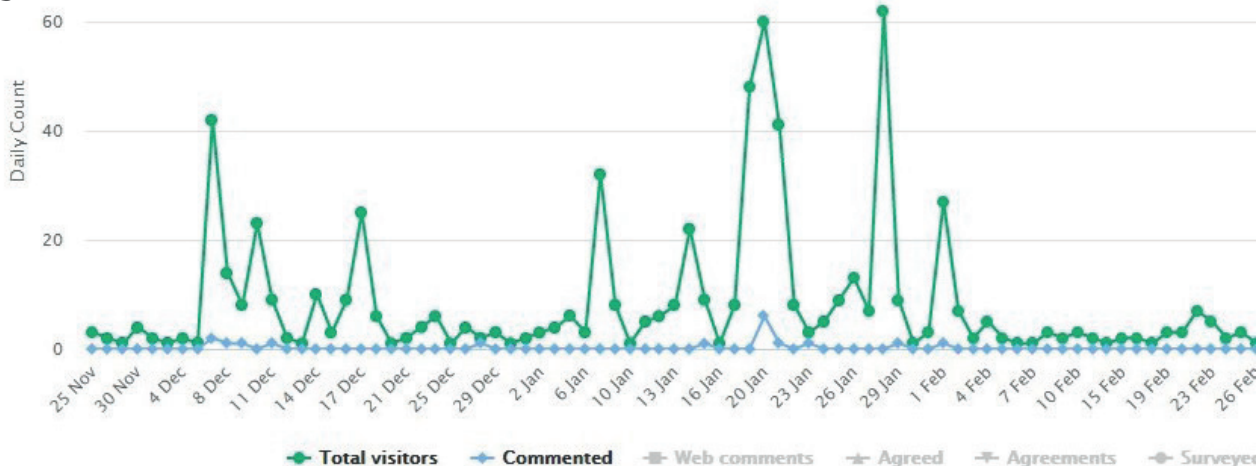
- The four boroughs and TfL- planning policy
- LB Newham Regeneration team
- GLA's Culture and Creative Industries Team
- HWFI Cultural Interest Group
- HWFI Developer and Business Engagement Manager
- HWFI Creative Enterprise Zone Manager
- Westfield Stratford
- Stratford Original BID
- Lendlease (IQL team)
- East Wick and Sweetwater
- GetLiving (East Village).

Figure 4: Commonplace visitors over time

### Visitors over time

Visitors	
561	Total visitors <span style="float: right;">Hide</span>
17	Total respondents
16	Commented <span style="float: right;">Hide</span>
0	Surveyed <span style="float: right;">Show</span>
2	Agreed <span style="float: right;">Show</span>
8	Subscribed to project news
Contributions	
36	Total contributions
23	Web comments <span style="float: right;">Show</span>
0	Survey comments <span style="float: right;">Show</span>
13	Agreements <span style="float: right;">Show</span>

Figure 5: Visitors over time



# 3. CONSULTATION FINDINGS

## RESULTS OF THE RESIDENT'S SURVEY

A survey was created to engage with local residents to gather anecdotal evidence on how they see that their local town centres have changed or may change in the future as a consequence of the pandemic. A number of key themes were covered within the questionnaire with a focus on understanding the effective functioning of the centre – in terms of its social and economic role and how due to the pandemic, they think this may change in the future. The survey results have helped to ensure that the updated draft SPD reflect the up-to-date local context. The questions asked in the survey are presented in Appendix 3.

The summary below provides an interpretation of responses and is focused on being relevant to planning and the draft SPD.

In total 13 responses were made, the majority of which came from residents whose main town centre is Hackney Wick (10), one response was made for each of the two other Centres (Stratford Metropolitan and East Village) and another one was related to Stratford High Street (see Figure 7). Although the survey was anticipated to provide only anecdotal evidence, other than for Hackney Wick Centre a small number of responses for other areas can only be looked at as an individual opinion and no significant weight can be given to indicate any trends related to that specific area. Nonetheless, all comments were analysed and taken into consideration.

The survey targeted only local people, i.e. those who use these Centres on a regular basis.

Figure 7:

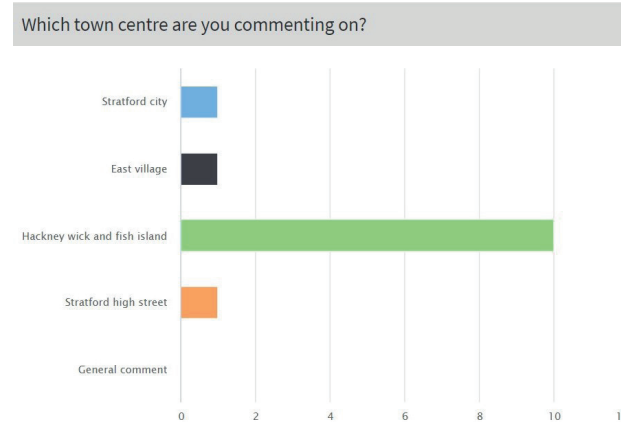


Figure 6 shows the main reasons why residents visit their local town Centres. This question was asked in order to set a baseline of Centres' main functions. As it can be seen in Figure 6, overall there is no one prevailing reason why residents visit their centre. Using centres for shopping, eating out, socialising and even exercise seems to be all equally important factors for residents to pay a visit to their centre. However, given that each of the three designated Centres and Stratford High Street have very different function and character, the responses were further analysed for each centre.

The survey shows that the prevailing reason for residents visiting Hackney Wick Neighbourhood Centre is for socialising, eating out and working, shopping scored lower than all centres on average. This is not surprising given that Hackney Wick Centre is an internationally- renowned cultural evening and night time (ENTE) destination with a concentration of night-time economy uses operating largely within the food and drink sector. NTE uses are also dispersed across the wider Hackney Wick and Fish Island area which is home to one of the

Figure 6

#	What are your main reasons for normally visiting this town centre?	Sentiment
9	Socialising	Positive (Red), Mixed (Yellow), Negative (Green)
8	Eating out	Positive (Red), Negative (Green)
8	Shopping	Positive (Red), Mixed (Yellow), Negative (Green)
5	Work	Positive (Red), Mixed (Yellow), Negative (Green)
5	Exercise	Positive (Red), Negative (Green)
1	errands, nature, walking around to dream	Negative (Green)
1	The fact that I live here. I used it for work and socialising.	Positive (Red)

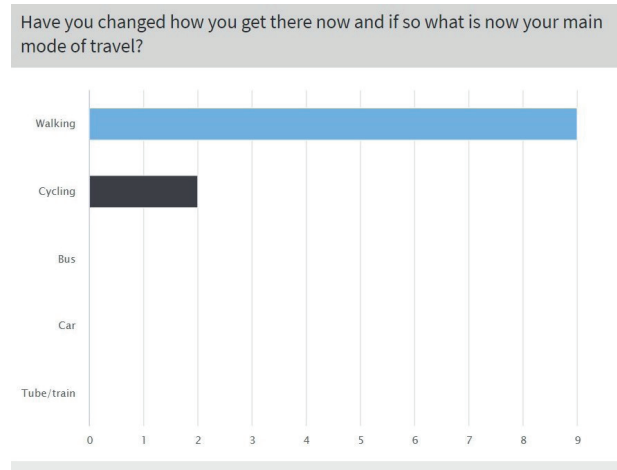
largest concentrations of creative activity within London and comprises a mix of historical industrial buildings and new developments. The Centre also benefits from a number of workshops and co-working spaces.

Although the responses related to the East Village, Stratford Metropolitan Centres and Stratford High Street also show that eating, socialising and working are important attractors, the responses also included shopping and exercising as two other main reasons for visiting.

The experience of lockdown has made clearer the need for well-resourced local amenities which is yet another reason why many cities are now looking at the 15-minute cities concept, where all local residents are able to meet most of their daily needs within a short walk or bicycle ride from their homes. The survey has shown that the LLDC's Centres are already in some way fulfilling this function by being easily reachable to the local community, Figures 8 and 9 tell us that even before the pandemic the main modes of travel were by walking and cycling, one respondent answer that it used public transport as the main mode of travel to the Hackney Wick Centre.

Furthermore, increasing remote and home working also means that many more people would have to rely on services and shops and even place to work nearer their home. The recent survey run by the EY, showed that on average, employees would want to work between two and three days remotely after the pandemic. Given that the LLDC local town centres benefit from a large presence of residential elements, this can pose an opportunity for the centres, particularly for neighbourhood and local type ones, to serve a larger number of residents particularly both during the daytime by providing flexible shared office space and complementary services, but as well for leisure and enjoyment purposes during the evening and night time hours. Aside from the potential increase of people staying

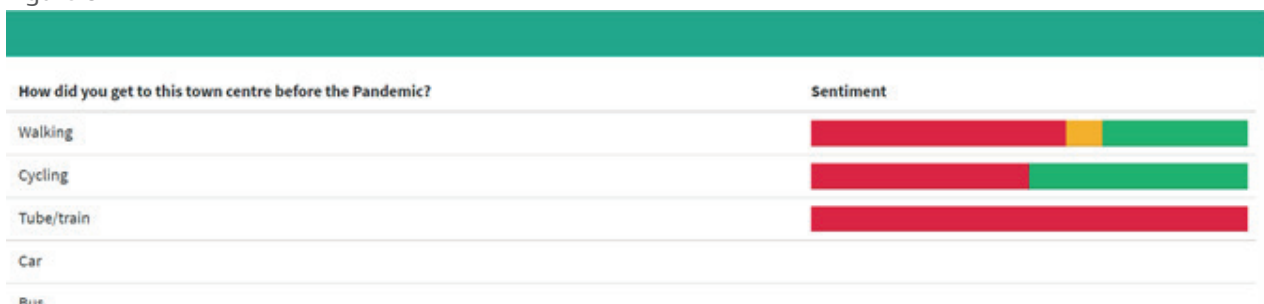
Figure 9:



within their local area that may create more demand for certain services, it is undeniable that there will always be a demand for the convenience of local amenities right on a doorstep. However, as the technology advances, speeding up the use of the internet for shopping and allowing more agile ways of working including flexible hours, how the local amenities will be accessed is also changing: late-night supermarket, late-night gyms and other services, “click & collect” services, and online takeaway orders are all responding to customers with a more 24/7 lifestyle. This also means that Centres need to respond proactively to these changes that are directly led by the customers’ needs. Responses to questions designed to understand whether the local Centres’ ability to meet resident’s daily needs and if the opening hours (both before and during the pandemic but not during the lockdown) correspond to the need of the local community show that respondents consider that the Centres somewhat meet the needs of the local community.

Answers to the questions are presented in Figures 8 and 9. The responses also indicate that it may be too early to draw conclusions as the changes will take some time to fully take place and the assumptions about the extent of remote working

Figure 8



and what this may mean for the Centres may not be fully understood at present. Also, it should be noted that the survey results may be inconclusive due to the lockdown that was introduced soon after the survey was initiated and many respondents may have referred to the performance of their centre during this period rather than in general. To better understand the new dynamic of the town centres it may be needed that a similar survey is repeated in the future when there is more certainty over new work patterns and shopping habits of local residents.

Although some trends are hard to fully predict or understand at present, the pandemic has had certainly brought online shopping to its crescendo and data indicates that this change is here to stay.

The ONS chart below shows that online shopping is not a novelty at all and that online sales have been growing sharply over the last ten years, reaching a massive peak at the start of the pandemic followed by further increases during the lockdowns to stand at around 30% between April and May, before falling back to 28% while still remaining 10%points above the period prior to the pandemic. The ONS study has also reported that the pandemic has not only increased online shopping but has also created a new wave of first-time online shoppers, who are likely to continue to shop online even after the pandemic.

This does not necessarily mean that brick-and-mortar retail cannot play a role in the function of town centres.

However, it should be recognised that the way people shop has fundamentally changed. There is an increasing need for uses that respond to this change,

Figure 10

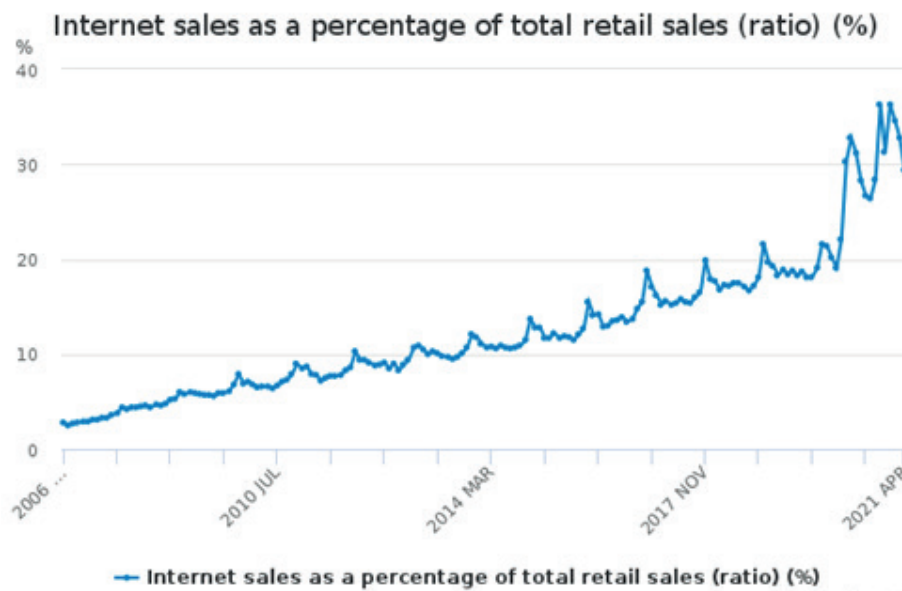


Figure 11

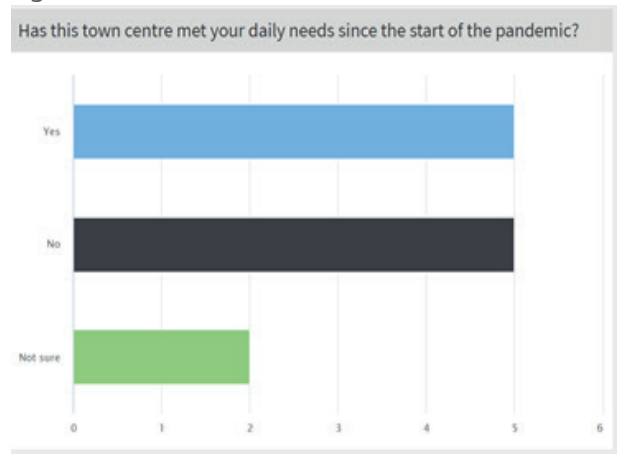
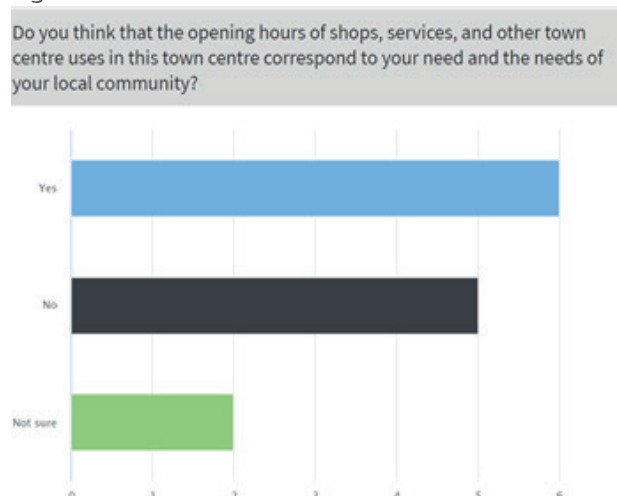


Figure 12



for example, instead of a more traditional store some retailers are looking at concepts such as a “showroom shop” - a place where a customer can look at an item and then buying it online either at home or on the move. Other retailers have become ‘multichannel’, combining physical stores, an online offer, and smart supply chains allowing customers a place to order goods for home delivery or order online to pick up later from a shop - “click and collect” services.

There is also a growing appetite for experience rather than just products when visiting town centers. This can provide an opportunity for more innovative ways of using a retail space but also for independent retailers, pop-ups, and new retail concepts and market environments to become an integral part of centers and attractors to the area.

The responses to the survey (see Figure 11) corroborate the above hypothesis and show that the local residents recognise these new models as a positive way for their local centres to respond to the trends related to the increase in online shopping and changing customer habits.

However, the GLA in its High Street and Town Centres Good Growth by Design Adaptive Strategy Guidance highlights that online shopping is not the main culprit of town centres poor performance. The document emphasises the overall importance of diversification of uses within town centres and high streets not only in relation to the rise of e-commerce but also to support a more vibrant economy. Their research shows that Londoners value these as places to meet, socialise, access services, shop, work and live.

Although the draft SPD recognises that the diversification of the day, evening and night time offer, and despite that the planning system cannot prescribe the company/retailer who occupies units, the survey also explored what services and uses local

residents see as particularly needed within their centre. The survey explored this by asking the residents an open-ended question to state what could their town centre offer that do not already and which shops, services, or uses may be missing.

The responses have flagged up the increasing need for diversification of Hackney Wick Neighbourhood centre, particularly to include uses that cater for every day needs such as convenience stores, a post office, and personal care services.

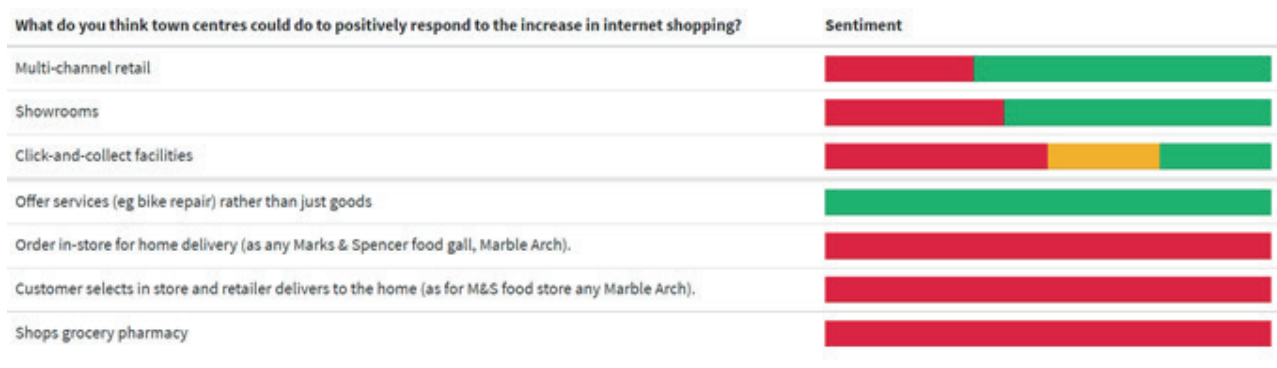
The Local Plan expects that the Centre accommodates a total of up to 10,000sqm of town centre uses including formerly A1 Use Class which can be occupied by grocery stores/supermarkets. In the past couple of years, the area has seen a significant level of new mixed-use developments coming forward that in accordance with the Local Plan will deliver a significant number of new retail floorspace alongside new homes.

A number of schemes have been completed in this area, delivering a notable amount of new ground-floor retail units. Some of those units have already been occupied, such as a new Sainsbury’s store in Wallis Road and the new café/grocer in the Bagel factory development on Hepscott Road.

Phase 1 of the East Wick development has also recently been completed delivering 1,600sqm retail floorspace which when occupied will provide a much-needed convenience store to the existing and new community. From the engagement with the developer, it is understood that the developer is in negotiation with one of the high street supermarket operators as a potential occupier.

Responses made on other Centres and Stratford High Street have also highlighted a need to diversify the current offer with the accent on more day to day personal care services, a response on Stratford High Street also called for more evening and night time uses.

Figure 13



## RESULTS OF THE SURVEY FOR LOCAL BUSINESSES AND A RETAIL SURVEY

The outbreak of the pandemic in March 2020, and subsequently repeated lockdowns have led to a significant damaging impact on the economy with retail, hospitality, creative, culture and night time industries bearing a significant brunt. Many retailers, restaurants, coffee shops, cultural and leisure destinations closed as only essential stores were allowed to stay open during the lockdowns. As explored above, this has triggered the digital and e-commerce to proliferate not only to shop for goods but it has also made use of online media to consume entertainment, culture and education, meaning that within all sectors there is a potential for the element of services to continue to be provided electronically.

The recent interim report into the future challenges and opportunities facing London, commissioned by the GLA, has shown that Arts and Culture have suffered the most and it is at particular risk with over 26,000 jobs on the line, and London's night-time economy facing huge challenges. Arts, entertainment & recreation had the biggest percentage fall, down 13.2% (28,000). Recently published HMRC data shows that the 'accommodation & food services' activities saw the second-largest fall, down 9.5% (43,500). These falls were far larger in London relative to the rest of the UK. Aside from the challenge that the more traditional high-time economy, such as arts, leisure, entertainment, culture and food and beverage services has faced, essential night workers have also faced many issues getting to and from works, shopping essentials and accessing basic amenities at night.

Undoubtedly, the pandemic has created one of the toughest trading climates for the retail, food and drink, and culture sector forcing it to rapidly adapt and show resilience in the face of the crisis. During the lockdown, many businesses looked at new business models, offering additional services such as takeaway options or digital services.

To support the changing economy, the government introduced changes to the Use Classes Order creating a new Use Class E that groups together a significant range of town centre uses falling under A1, A2, A3, but also B1 (a-c), parts of D1 and parts of D2 can change to the new E Use Class, allowing the changes to take place within this Use Class without the requirement for planning permission. This also

allows properties with multiple concurrent uses. It is expected that this will aid the diversification of town centres making them more resilient and give flexibility for businesses to adapt and diversify to meet the changes in technology and consumers' habits, particularly the rise of internet shopping, reduced footfall in some locations, and the increased prevalence of home working.

It should be noted that many ENTE uses have been now designated as sui-generis including pubs, drinking establishments (formerly A4), takeaways (formerly A5) and cinemas, concert halls (formerly D2) and newly defined sui-generis for live music venues. This means that changes of use from these uses will continue to be managed through the development plan policy.

In principle, the LLDC recognises that modern town centres will have to adapt to provide a wider range of facilities and services, including new emerging uses, for example, multichannel shops as discussed above, this can attract people and make Centres viable now and in the future. It also, in principle, supports the opportunity for the premises to be used flexibly and innovatively, such for concurrent operations of compatible uses.

To understand how local businesses see these changes and how they have been impacted by the pandemic, the survey sought their views on the above outlined matters.

Five local businesses responded to the survey, this is a relatively small number of responses and the data presented in this report cannot be seen as representative for the whole area. The low number of responses is most likely due to the lockdown that was introduced during the consultation period that made some businesses close or operate with limited number of staff. Nonetheless, the results still present a helpful insight. The profile of the businesses that responded to the survey shows that four surveyed businesses are medium and one large, counting over 50 employees. All businesses are independent retailers/service providers that provide services ranging from a restaurant, retail, a tech company, and a church, serving both the local and a weirder community.

All businesses stated that they have continued to operate since the outbreak of the pandemic, four surveyed businesses have been operating with a reduced service due to the social distancing measures or demand and one reported increased demand during this period (the technology company), see Figures 14 -17.



Figure 14



Figure 17

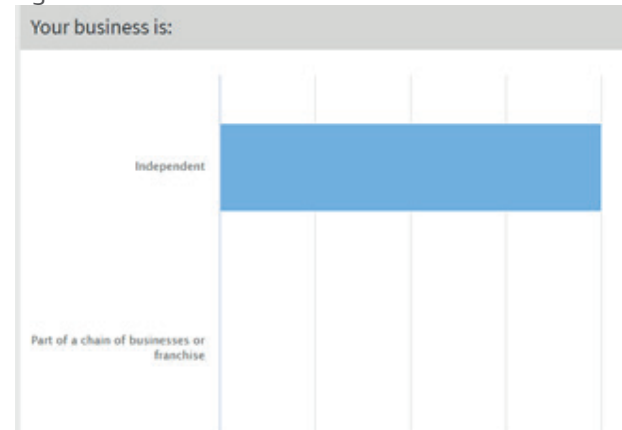


Figure 15



Figure 16



In relation to the changes to the UCO, all respondents welcomed the flexibility that it provides and said that this can be hugely beneficial to supporting a broader array of businesses requiring different class uses throughout the management of locations.

They also consider that if done properly this may have a positive impact on the local town centre within which their business operates, allowing for a more vibrant environment. It was considered that not having space chained to business class usage,

which can be very difficult to change, means that the landscape of towns will change faster and suit the changing needs, expectations and demographics of local areas. Unifying the uses within one class would create more cohesion between them, open up more information exchange between sectors and foster a better community.

Under the temporary relaxation of planning rules by the government, in response to the pandemic, which allowed some pubs and restaurants to operate as hot food takeaways, many businesses said that they used this relaxation to pivot their business to include some complementary services.

In relation to the impact of e-commerce on the local businesses, the businesses, in general, believed that the power of physical space will remain important with added social functions such as places where people come together to work, play and explore. The rise of virtual experiences may fill a gap going forward but would not replace the need for brick-and-mortar shops. One response said that they have seen online shopping, for their fashion business, as a chance to use physical space for better reasons than just as a shop floor, such as a space to create community, collection/drop-off, repair, educate and engage with those in local areas.

Given the fairly small number of responses to the survey, to further understand the impact on the local businesses and Centres, a retail survey was conducted to capture the retail vacancy rates and changes within the Centres.

Town centre monitoring takes place annually showing vacancy rates within the designated town centres. Due to the social distancing measures, travel restrictions, and closures of non-essential stores, it was not possible to carry out the monitoring in December as usual. Instead, the monitoring was carried out as soon as the pandemic

restrictions were eased in April 2021. The results show that on average the vacancy rates across the area increase by 2%. However, the vacancy rates increase was only recorded within the part of Stratford Metropolitan Centre within the Legacy Corporation boundary from the previous 6% to now stand at 12%, while the East Village and Hackney Wick town centre has maintained the same level of vacancy rate of 10% and 5% respectively. This indicates that different profiles of centres have been impacted in different ways.

This is corroborated by the latest Local Data Company analysis showing similar trends on a national level. The H2 2020 data on a national level shows that centres have been impacted differently depending on their main function. The shopping centres have been the hardest impacted, this is particularly due to the high concentration of comparison goods retail that were both deemed non-essential during the pandemic and also while more diverse, mixed-use town centres which are tucked within or in the vicinity of a residential area, counting a smaller percentage of comparison retail offering and higher service and convenience offer and a higher balance of independent retail, were more resilient to the crisis. These centres even recorded an increased footfall due to home working and studying.

This may explain why the East Village and Hackney Wick Centres have shown some resilience to the crisis given their nature and function to serve the immediate local population rather than visitors and workers. Furthermore, the East Village Centre is also entirely managed by Get Living who worked closely with the retailers to support them in the form of rental concessions and marketing assistance.

As stated, the Stratford Metropolitan centre has seen an increase in vacancy rates. However the majority of main town centres uses are situated within Westfield Stratford shopping mall and across the IQL development, these units are fully managed by these two companies. Furthermore, the centre is serving both local and wider community and benefits from the visitors who are coming to the area for other important attractions and thus is not heavily reliant on the commuters and office staff.

The areas within and adjacent to the centre has seen a number of significant new developments for example the delivery of the East Bank project that when completed will provide a home to renowned institutions such as the BBC, Sandler's Well and the UCL, as well as the Cherry Park 1,224 new homes

that are currently under construction. This will further increase the footfall from the visitors to the area. The main town centre uses are also situated along the way from the main transport node, Stratford station, to the Queen Elizabeth Olympic Park and the London Stadium. As the restrictions ease it is expected that the increased footfall will improve vacancy rates. The engagement with the head of the retail at Westfield confirmed that major changes are not expected to take place and while the retail offer will continue to evolve there is still strong demand for retail within the shopping centre with a potential for a smaller uplift in food and drink offer.

The town centre monitoring has also shown that all three Centres continue to maintain a good proportion of units occupied by retail, apart from East Village where traditionally the majority of units have been occupied by food and drink uses.

Review of planning applications submitted during the time of the pandemic which relates to commercial and other non-residential uses within the Centres, as well as discussions with other local planning authorities via the Night-time Boroughs Champion group, highlighted the importance of the adaptable public realm, open space and transport infrastructure within town centres. It was found that shops and hospitality venues adjacent to wider footpaths and adaptable public realm provided an opportunity for hospitality venues and business to continue to trade and cater for local need. This allowed Centres to adapt and be more resilient providing space for social cohesion, wellbeing and exchange.

Well designed, adaptable and flexible public realm and transport infrastructure are important not only during the crisis but also in any future placemaking interventions to enable places and Centres to adapt to changes in the future.



Nonetheless the above, it is acknowledged that it is not entirely possible to predict all consequences of such an unprecedented and unforeseen disruption particularly as some of the more traditional data collection process does not always permit capturing rapid or fluctuating changes in a timely manner.

To be able to monitor how this is going to impact Centres, the LLDC has created a live GIS-generated database of all commercial premises within each town centre. The database includes name and type

of business, use class, vacancy and opening hours. This will allow to monitor ongoing changes as well as clusters of activities and evening and night time uses. The snapshot of the data is shown in Figure X. Furthermore, the LLDC will also rely on other data sources such as the Mayor's Night Time Data Observatory that provides a range of research and big data on London at night, including data on the night-time offer in economic and cultural terms, as well as data on crime, community safety and public health.

## RESULTS OF THE SURVEY SOUGHT ON THE OVERALL RELEVANCY OF THE DRAFT CONTENT OF THE SPD IN THE POST PANDEMIC TIMES

The LLDC considers that overall the scope and the main principles of the SPD are comprehensive and that the draft document in large remains relevant in respect to providing planning guidance for the protection and provision of cultural and night-time uses across the area. As shown in Table 1, the SPD covers a broad range of matters such as general management principles, lightning, wayfinding, agent of change principle, safety consideration including guidance on improving safety at night for women. Although the planning cannot provide the response to all matters, particularly wider economic challenges, the SPD provides the protection and secure provision of new evening cultural and night-time uses across the area and ensures their appropriate management. These principles are becoming increasingly important during the recovery of the evening and night time economy in the coming period where there is a risk of many uses being lost if there is no clear guidance on their protection.

The responses received during the informal public consultation corroborate this. There were in total five responses three of which stated that they consider that the SPD is very well considered and, if implemented, would significantly enhance the area. In particular, support was provided to proposed softening and greening of the hard landscape, measures to reduce external storage of rubbish, bottles, agent of change principle and ecologically sensitive lighting.

An opinion was expressed that the Covid restrictions will be temporary. The area is expected to see a lot of new residential buildings and with people staying more locally post pandemic, it is sensitive to concentrate on making the area more appealing with more to do in the evenings and at night.

One comment was related to general parking issues within the area and the other one was not related to the content of the SPD.

## RESULTS OF THE ENGAGEMENT WITH STAKEHOLDERS

An extensive one to one engagement was also conducted with the following groups and individuals:

- The four boroughs and TfL- planning policy
- LB Newham Regeneration team
- GLA's Culture and Creative Industries Team
- HWFI Cultural Interest Group
- HWFI Developer and Business Engagement Manager
- LLDC Development Management and Regeneration team
- HWFI Creative Enterprise Zone Manager
- Westfield Stratford
- Stratford Original BID
- Lendlease (IQL team)
- East Wick and Sweetwater
- GetLiving (East Village)

All stakeholders overall expressed support to the SPD. The three boroughs, LB Hackney, LB Tower Hamlets and LB Newham provided support for the preparation of the SPD and the general principles and approach taken. They welcomed ongoing engagement on planning matters and collaborative working to develop a shared evidence base and night-time policy direction for the area to enable a seamless transfer of powers back to the local authority. LB Waltham Forest was consulted but did not provide a response.

Some of the key points raised during the one to one meetings with the above listed stakeholders can be summarised as following:

- The GLA Culture and Creative Industries Team supported the consultation approach.
- In general, all interviewed stakeholders support was expressed to the principles of the SPD, it is considered that it provides positive and well-structured guidance.
- It was highlighted that forthcoming developments will help diversify the evening and night time offer in the area, for example East Wick and Sweetwater development will provide a significant amount of new town centre uses. Elements of which are starting to get delivered within Phase 1 providing a variety of day-time and evening uses including shops and services to

cater for resident's everyday needs. The occupation of commercial and retail floorspace is on time despite the pandemic.

- More importance should be given to street trading activities, outdoor markets and outdoor seating.
- Street markets can be used to animate the area and drive footfall making a good transition between daytime and the evening/night time economy. It should be acknowledged that those operations may be difficult to control therefore preferably those events should to be focused within a specific area and well managed.
- There is an increasing demand for town centres to become the areas where people can socialise and dwell, the design of public realm and infrastructure should respond to this.
- Town centres' function has seen a dramatic change in the last 20 years. More accent should be given to placemaking and not just the traditional shopping experience, this should include improved infrastructure, good quality open space and a variety of other uses such as leisure, cinemas, personal care services, and wellbeing facilities.
- The pandemic is expected to change how and when people use their town centres and it is expected that the evening economy will proliferate with home working and therefore Centres should be planned to accommodate more evening uses.
- It is expected that the East Bank will encourage longer opening hours within the area, new developments should respond to this.
- There should be more consideration around how outdoor space can be utilised for different activities such as pop-ups and temporary festivals.
- The SPD could look at the day time offer and the relationship between the transition from day time to night-time offer. How town centre can also provide space for families.
- It was highlighted that there is very poor food and beverage offer within Stratford High Street, the majority of people are only transiting though. It should be explored how more varied F&B offer can attract people who are working,

living and visiting the area to spend more time. Consideration should be given to the provision of affordable workspace in and around Stratford High Streets that can potentially activate and animate the spaces and bring footfall and vibrancy.

- The pandemic has negatively impacted the Stratford Cultural Quarter that struggled to retain some of the cultural venues. Stratford Circus has closed and it is anticipated that a youth club will take its place.
- Westfield Stratford continues to be the dominant driver of economic activity and the main evening attraction within the Metropolitan Centre with 3 hotels and a Casino that not only provides nigh-time activities but also contributes to the night time economy by providing jobs. There are currently 85 different food and beverage units within Westfield that operate within evening and night time hours and this offer is expected to expand in the future.
- It is expected that the retail offer and demand within Westfield will continue to evolve over time. The evolution of retail is moving more from fashion toward lifestyle, wellbeing, leisure and food. The future may not be about getting more retail but upsizing the current ones. Many brands are expanding their offer from purely clothing to offering other elements such as home textile
- A large number of people working during night-time use Westfield to buy food, it is estimated that around 1,500 night time workers visit Westfield each night.
- A sharp rise in food deliveries from the Westfield restaurants to the neighbouring residential developments has been seen. This has been accelerated by the current pandemic and it has been the main night-time activity within the area.
- Flexibility given by the new Use class E is welcomed however protection of night time uses are important in the post-Covid world.
- Arts and cultural uses within East Bank are much welcomed and will benefit the Stratford Metropolitan centre. IQL will introduce uses to complement the East Bank offer.
- Newnham's part of the Stratford Centre is

lacking its identity as a town centre. Planning rules should be strict to preserve the existing night time officer but at the same time flexible to allow any changes that need to happen in order for this town centre to develop its identity through testing the ground.

- The Stratford BID area needs to see the delivery of more commercial properties and therefore the introduction of other non-residential uses such as student accommodation should aim to incorporate commercial and workspace and create active frontages. This should include a genuinely affordable workspace that can help to create a start-up environment. Currently, the area lacks a smaller scale business space, this needs to be introduced to create a more balanced and mixed economy. The workspace created within the Unite scheme at Angel Lane, which also provides the active shop frontages was mentioned as a good example.

- The draft SPD acknowledges that an NTE priority for East Village is to maintain and strengthen the current vitality and offer to meet local needs. Given the location, it should be acknowledged that there is a finite capacity for viable F&B retail within East Village. Much traditional NTE that might suit other local centres profiled within this consultation is not appropriate or possible within East Village's residential setting e.g., nightclubs, theatres, cinemas. We are a different 'town centre' to the others.

- An element of NTE within East Village is delivered through public realm events programme e.g. outdoor cinema, theatre festivals and seasonal celebrations.



## KEY CHANGES

All of the above have influence changes to the draft SPD. The summary of the changes against each key matter is summarised in Table 2.

<b>Table 2: Summary of the key changes</b>	
<b>Matter raised</b>	<b>Proposed minor changes</b>
The London Plan was adopted in March 2021, the Culture and Night Time Economy SPG has been superseded by the new London Plan. Policy HC6 refers to the evening night time economy as time between 6pm to 6 am.	The SPD has been renamed to including reference to evening as well as night time. Any reference to the SPG has been removed.
The outbreak of the pandemic subsequently repeated lockdowns have led to a significant damaging impact on the economy with retail, hospitality, creative, culture and night time industries bearing a significant brunt.	The SPD has been revised to acknowledge the impact that the pandemic has had on the economy and particularly the evening and night-time economy as well as to emphasise the importance of the appropriate planning to support the evening and night time economy and ensure that businesses and centres can adapt to become more resilient. Reference was made to the key documents produced by the Mayor in response to the impact of the Covid-19 on the night time economy.
The wider economy is evolving rapidly. Digital technology, big data and new ways of delivering goods and services are all changing the nature of how we shop and have a direct impact on town centres. Jobs and the nature of work itself are changing, with more people working flexibly and remotely. These changes have been additionally accelerated by the pandemic. To respond to these evolving changes the Government recently changed the Use Classes Order to provide greater flexibility to aid the diversification of town centres and to provide the flexibility for businesses to adapt and diversify to meet the changes in technology and consumer habits.	<p>More use of digital technology and data to inform proposals and decisions. Reference to the GLA's Night Time Data Observatory that includes a variety of data on the night-time offer in economic and cultural terms, as well as data on crime, community safety and public health has been encouraged to be used in decision making process and to inform proposals. The LLDC has also prepared a GIS-generated database of all commercial premises within each town centre including their opening hours.</p> <p>The SPD recognises that the modern town centres will adapt to provide a wider range of facilities and services, including new emerging uses that will attract people and make Centres viable now and in the future. The design is to play a key role in ensuring that new units are designed in a way that allows changes to happen sustainably. However, it also expects that some evening night time uses are protected, such as places of community value.</p> <p>A mix of uses within Centres should also reflect evolving working patterns, with a growing shift towards home working.</p> <p>Given that the new Use Class E now contains a broad range of uses, development proposals should prepare a Strategy around how the units will be designed to provide flexible, well-design and adaptable spaces. The Strategy should clearly set out the approach that will be taken to ensure that those spaces are adequate for proposed use/s.</p>

<p>The consultation with the stakeholders and guidance prepared by the GLA on the nigh-time recovery from the pandemic has highlighted the importance of the adaptable public realm, open space and transport infrastructure within town centres was brought into focus during the pandemic providing an opportunity for hospitality venues and business to continue to trade and cater for local need.</p>	<p>The updates to the SPD emphasises that the well designed, adaptable and flexible public realm and transport infrastructure are important not only during the crisis but also in any future place-making interventions to enable places and Centres to adapt to changes in the future.</p> <p>Large scale proposals, particularly masterplan scale proposals that will create new Centres, as envisaged by the Local Plan, should plan for well-designed, adaptable and inclusive public space with a potential for the space to host outdoor pop-up events, markets including night time markets and community events as well for the outdoor seating connected to hospitality venues. Coordinating public realm events with adjacent ground floor activities can improve the street experience. These opportunities should be explored and presented within the Public Realm Strategy and submitted with the planning application.</p> <p>The public realm within Centres should also be designed to provide spaces to dwell and for social interaction. The design and quality of the public realm, streets, and spaces is key to ensuring Legacy Corporation Centres are pleasant, safe, and convenient places to walk and cycle during the day and night.</p> <p>More accent was placed on creating an opportunity for more street trading and outdoor seating.</p>
<p>The importance of well designed, adaptable public realm and land use holistically was brought into focus during the pandemic. It was found that centres with a good amount of flexible and adaptable public realm including wide footways, squares and green spaces, were more resilient to the crisis as these spaces provided an opportunity for business to continue to trade and cater for local need. These spaces were also provided place for social cohesion, wellbeing and exchange.</p> <p>This is also corroborated by the results of the survey that was created for the local residents and businesses.</p>	<p>The SPD provides guidance on outdoor seating and trading as well as the importance of public realm within the Centres to provide space to dwell and for social interaction. The potential for these spaces to be used for outdoor pop-up events, markets including night time markets and community events.</p> <p>Well designed, adaptable and flexible public realm and transport infrastructure are important not only during the crisis but also in any future place-making interventions to enable places and Centres to adapt to changes in the future.</p> <p>The SPD highlights the importance that this is taken into consideration at an early designed stage for large scale/masterplan proposal within the future town centres as envisaged by the Local Plan, such as at Pudding Mill and Bromley-by-Bow.</p>



Through the conversation with several stakeholder the issues around the perception of safety within some parts of the Stratford Metropolitan Centre were highlighted.

The engagement with the stakeholders and survey have also highlighted several other issues related to the individual Centres such as further need for diversification of uses within the Hackney Wick Town Centre, poor offer of evening and night time uses within Stratford High Street area and well as a specific management approach within East Village given it residential focused.

Further guidance was added to address the safety issues within the Stratford Metropolitan Centre through the appropriate designed to create well-lit, well used signed posed places that feel safe at night and create the on-street surveillance that enhances public safety and deters crime and nuisance.

The SPD encourages the diversification of evening and night time uses within the Hackney Wick and Centre and High Street area.

It also recognises the specific function and nature of the East Village Centre and provides focus on the ongoing public realm events programming e.g. outdoor cinema, theatre festivals and seasonal celebrations. Additional leisure uses are also important to support the evening and night time offer

# APPENDIX 1 - SUMMARY OF STATUTORY CONSULTATION RESPONSES

Section/page	Summary	Response
General Comment	Need for an off licence 24h shop within East Village Neighbourhood centre.	Comment noted.
General Comment	Highways England is satisfied that the Night-time Economy SPD is will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Accordingly, Highways England does not offer any comments on the consultation at this time.	Comment noted.
General Comment	The Policy Areas set out within the SPD are not within the jurisdiction of the PLA and therefore there are no observations to make on the content of this draft document.	Comment noted.

	<p>Get Living supports the night time economy at East Village to balance with the needs of residents, in doing so GL have created a 'vibrant' place. GL also supports needs that NTE needs to develop in 'a sympathetic' way.</p> <p>GL disagree that there has been lost activity through retail closures and outlines that the vacancy rates still remain below the industry average. Of 31 units available, 29 are trading and 1 is prepared to open (excluding Victory Plaza) 14 of these trade after 8pm.</p> <p>The SPD should be sufficiently flexible and able to respond to the anvolving needs of East Village to enusre a triving and vibrant local centre.</p> <p>Table 9.1 should be amended to make a reference to main town centre uses as defined by the NPPF.</p>	<p>Comments noted.</p> <p>The SPD recognises that the East Village town centre is evolving and in general provides flexibility by allowing town centres to grow and diversify in a way that can respond to rapid changes in the market.</p> <p>Amendments to the Table 9.1. have been made to incorporate reference to other appropriate town centres uses as in line with Policy B2, table 4 of the Revised Local Plan: Small-scale retail (A1-A5) <u>and office/workshop uses</u></p> <p>The NTE SPD recognises the importance management or retail forums and strongly supports them.</p>
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	<p>Recommendation for an E20 Retail Forum to be established to bring together all listed areas to help share the best practice, better understand activities underway and challenges faced.</p>	
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<p>General Comment</p>	<p>The topic of the SPD is unlikely to have major effects on the natural environment, but may nonetheless have some effect. Natural England do not wish to provide specific comments, but advises to consider the issues such as green infrastructure, biodiversity enhancement, landscape enhancement and other design consideration as we as SEA/HRA.</p>	<p>Comments notes.</p> <p>An amended is proposed to highlight the appropriate use of green infrastrcuture: <u>"New proposals should include, where practicable, appropriate use of green infrastructure in a manner that minimises light and noise pollution, as well as contribute to providing a sense of safety and security in line with the Secure by Design guidance."</u></p>
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<p>General Comment/Introduction</p>	<p>the Trust a statutory consultee for planning applications,. In addition to this, the Trust also recognises and values the important role played by all levels of the planning system in not only protecting its network of canals, rivers and docks from inappropriate development and protecting and enhancing the natural and historic waterway environment, but also in unlocking the potential of the inland waterway networks for the greater benefit of the wider area. In particular the Trust is keen to ensure that Planning Policy recognises the multi-functional nature of the waterways and the contribution they can make to not only the environment but to wider economic and social objectives such as public health, renewable energy and sustainable development, future proofing our urban areas by strengthening their</p>	<p>Comment noted.</p>
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	resilience and creating conditions suitable for growth.	
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<p>General Comment</p>	<p>There are various opportunities presented by waterways, such as:</p> <p>Opportunity to improve connectivity and increase the use of sustainable transport. for inland waterways to contribute to the low carbon economy and build resilience includes new energy technologies such as biomass capacity.</p> <p>Opportunity to incorporate innovative technologies to make use of water, for example for cooling and heating.</p> <p>waterways can support and enhance urban development by for example the ability to receive runoff from future development sites and thus allow development of site that would otherwise not be viable due to flood risk concerns.</p> <p>The wider environmental benefits of waterways as green infrastructure are well known, but in urban areas</p>	<p>Comments noted.</p>
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	<p>waterways are particularly important in providing “blue lungs” for residents and visitors, with resulting physical and mental health benefits, and for their contribution to urban cooling in hot summer months. Canals have successfully formed the basis for leisure and recreation-driven regeneration across the country. The waterways already generate economic benefits particularly in terms of tourism and leisure activity and thus support local economy. Canals also act as a catalyst for the development of property lining side them.</p>	
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	<p>The Trust believes that our canals and waterways have a role to play in the development of a successful night-time economy in the LLDC area. Any activities must be sensitive to boaters who are moored in the area, and to the wildlife and ecology that makes its home in and around the waterways. Water-based night-time activities, such as restaurant boats, could be acceptable in appropriate locations, to complement the adjacent land activities, if there is appropriate access. These can be a good way of animating the towpath in the right areas and providing security by natural surveillance/presence. Barge East, at our Sweetwater trade moorings site, is already a good example of this. It may be beneficial to have something similar at East Wick and other areas.</p>	<p>Noted. Further detail to be included relating to waterways in 'signage and wayfinding' section on page 19 as follows: <u>"The Waterways and Moorings Strategy, as represented in Figure 13 of the Revised Local Plan shows potential for a number of visitor and leisure moorings across the area. Where appropriate access can be achieved, these locations may be suitable for water-based night-time activities"</u>.</p>
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<p>Wayfinding and security P.16</p>	<p>The Canal &amp; River Trust would supports the continued role out of Legible London wayfinding signage around the waterways within the LLDC area.</p> <p>The SPD should also take account of 'Under Lock and Quay' guidance, published by the Trust, that provides the most appropriate and effective way of designing out opportunities from criminal activities and reducing fear of crime in existing and new developments.</p>	<p>Noted. Further detail to be included relating to waterways in 'signage and wayfinding' section on page 19 as follows: <u>Water-based proposals or those affecting the waterways should take account of the 'Under Lock and Quay', the Canal &amp; River Trust's good practice guidance for designing out crime from waterside environments.</u></p>
<p>Wayfinding, signage and lighting Page 18</p>	<p>Key connections figure from Local Plan identifies a route for improvement along towpaths except Old River Lea between Old Ford and Carpenters Road Lock and northern City Mill River.</p> <p>Support improved access along towpaths balanced with other concerns such as night-time safety through largely unlit areas and protection of ecology and wildlife in retaining some darkened</p>	<p>Noted. It is considered that the above proposed amendments will cover security along the towpaths.</p>

	<p>spaces. In some areas activities can improve safety and welcome consideration of how this could be implemented where night-time activities affect a waterway.</p>	
<p>Page 51 - Figure 9.5 Strategy for Potential New District Centre (Bromley-by-Bow SPD)</p>	<p>Figure 9.5 does not highlight Bow Free Wharf, an essential working wharf on the Lee Navigation. Its operational activities should be considered, as some night time economy activities may not be appropriate in the vicinity of the wharf.</p>	<p>Noted. Figure 9.5 comes directly from the Bromley-by-Bow SPD for information therefore it is not possible to amend. However, amendments proposed to insert the following text on page 49: "<u>New proposals should also be sensitive to operational activities, such as those at the Bow Free Wharf</u>".</p>

	<p>Thank you for consulting the Mayor on the SPD draft. Development plan documents must be in general conformity with the London Plan and supplementary guidance must not introduce new policy. Mayor has given delegated authority to respond. Mayor welcomes the SPD as planning for a 24 hour city is a priority as set out in Vision for London as a 24 hour city, reflected in policy HC6 of the draft new London Plan, encouraging boroughs to promote the night-time economy in appropriate locations. Better planning and management of the city will support modern lifestyles led by Londoners, boost the economy and ensure it remains a thriving centre of culture and creativity. Since production of the SPD there have been two key developments in Mayor's approach to London at night, which are the publication of the 'London at Night'</p>	<p>Noted. The SPD will be updated to reference to reports to London at Night and Think Night Reports to be added on page 9 as follows:  "Vision for a 24-hour City  <u>London at Night: and evidence base for London as a 24-hour City</u>  <u>Think Night: London's Neighbourhoods from 6pm to 6am</u>  Culture and the Night-Time Economy Supplementary Planning Guidance..."</p>
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	<p>document which is comprehensive research looking much wider than food, drink and entertainment businesses taking a holistic view looking at all work types, revealing that 1/3 of London's workforce usually works at night, where largest sectors are health, professional and culture and leisure. The second is the London Night-Time Commission's report which also takes holistic view of London at night and recommended boosting high streets by building on London's cultural and leisure offer, improving the public realm after dark and promoting a more diverse range of services and activities that are open later into the evening.</p>	
	<p>Discourages use of the term 'night-time economy' as it does not adequately describe the scope of the SPD which covers more than night time</p>	<p>The Legacy Corporation will continue to engage with the GLA to determine the most appropriate terminology which adequately reflects the scope of the document.</p>

	entertainment and food and drink.	
Page 5	Incorrect information on jobs and value as not GLA research figures. GLA research states one-third of workforce work at night.	Noted. Change at page 5 to remove the following text " <del>The GLA estimate that 40% (£26bn) of the UK night time economy (NTE) activity takes place in London, supporting 723,000 direct jobs</del> ".
page 7	Should use latest definition in London at Night and Think Night reports and make reference to wider range of activities operating in area and workforce serving these businesses.	Noted amendments proposed to insert the following definitions on page 7:  <u>"The GLA defines the 'night' as everything that happens between 6pm and 6am. London's 'nightlife', what people do for culture and leisure, is an important part of this. However, for the first time, this study considers all industries and occupations – from healthcare to culture and hospitality to logistics – that operate at night. Night time industries and occupations are parts of an economic category with a higher than average representation of night workers."</u>
Page 9	Should reference London at Night and Think Night reports.	Noted. The SPD will be updated to reference to reports to London at Night and Think Night Reports to be added on page 9 as follows: "Vision for a 24-hour City <u>London at Night: and evidence base for London as a 24-hour City</u> <u>Think Night: London's Neighbourhoods from 6pm to 6am</u> <u>Culture and the Night-Time Economy Supplementary Planning Guidance...</u> "
Page 13	Second paragraph is incomplete.	Noted.
page 17	Missing 'safety' from Women's Night Safety Charter.	Noted. Following amendment to be made on page 17 " <u>London Women's Night Safety Charter</u> "



Page 17	Reference Think Night information on lighting and wellbeing. Should continue to work with neighbours to promote and manage NTE.	Noted. Further detail to be included in the security, lighting and wayfinding considerations section as follows: Page 17- <del>"New proposals should include effective lighting, both of individual buildings and of the connecting private and public realm. A well-lit street does not mean a brightly-lit street therefore careful design and planning of lighting should be a fundamental part of proposals for individual buildings and connecting private and public realm. Effectively-designed lighting will make streets and spaces more welcoming, encourage physical exercise and play, create vibrancy, protect character, support biodiversity and benefit wellbeing."</del> Page 18- <u>"Lighting proposals utilising the latest technologies to manage lighting levels, reduce energy use, or incorporate lighting functions with security measures, electric vehicle charging or monitoring sensors will be considered positively."</u>
	Comments below from departments across the council.	Noted
	Potential for crowd dispersal and public safety issues from varying uses promoted along Stratford High Street and the town centre. Use of Dispersal Strategies welcomed particularly relating to public safety, transport concerns and noise.	Support welcomed.

Licensing – Pg 15	<p>Proposed amendment to page 15 to reference that licensing would expect applicant to demonstrate that they would not add to existing problems of area.</p> <p>Look forward to coordinating on SPD further.</p>	<p>Noted. Amendment to be made on page 15. Therefore, in Stratford, Newham Council's <del>first reaction</del> will normally be to refuse new licence applications in the CIP area, <u>unless the applicant can demonstrate that they will not add to the existing problems in the area</u>'.</p>
Stratford Metropolitan Centre	Security.	Noted.

<p>What is the Night Time Economy (NTE)?</p>	<p>NTE is important to local residents and visitors. Attempts to focus on financial benefits will be deemed costly to local residents. Push for 24 hour economy on top of existing provision worrying. Was proud of LLDC creation but object to these proposals. 24 hour NTE will harm local cultural traditions by forcing to adapt to noise and light pollution. Should protect residents' interests and ecosystems. LLDC is working for the businesses rather than existing social and cultural economy. Existing venues operate well into the night but if proposal goes ahead will operate later causing congestion and traffic. Crime will increase and illegal businesses operate alongside large events. Residents will suffer as seen in Stratford parts of Newham, where homelessness on increase. Schools will struggle to contain and manage their</p>	<p>Comments noted. The SPD is seeking to manage the NTE effectively.</p>
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	<p>students during late events. Therefore NTE should not be allowed as not in best interest of communities.</p>	
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	<p>Comments represent views of TfL officers and are on 'without prejudice' basis. Made from role as transport operator and highway authority and not necessarily that of the GLA. A separate response has been prepared by TfL Property to reflect their interests as landowner and potential developer. A number of specific comments are made. Continue to work together on final document. Growth should be supported in public transport investment and active travel in accordance with Healthy Streets approach. So need better integration of land use and transport planning. Also continue to work on transport capacity and connectivity, especially unlocking good growth.</p>	<p>Noted. Will continue to work with TfL as document is finalised.</p>
<p>Wayfinding and security P.16</p>	<p>Should be 'avoiding creating passenger flows too great for pavement capacities'</p>	<p>This was an error within the original document which will be corrected as follows: '<u>avoid createing</u> passenger flows that are too great for pavement capacities in a particular town centre'</p>

Wayfinding and security P.16	Amendment proposed to state that TfL promotes the Legible London signage.	Noted. Amendment to be made on page 16 as following: "TfL <del>is also responsible for</del> promotes the London-wide Legible London...."
Wayfinding and security P.16	Should prioritise active travel and public transport as most convenient way to travel by amending text to include reference to walking, cycling and public transport between Stratford High Street and Stratford Metropolitan Centre.	Noted. Amendment to be made on page 16 as following: "New development proposals in this location should <del>facilitate</del> <u>prioritise walk, cycle and public transport</u> access between Stratford High Street and Stratford Metropolitan Centre to increase connectivity for <u>active travel modes</u> and pedestrian flows between the two locations.'
Wayfinding and security P.16	Text could be amended to enable sustainable active transport modes to be attractive and convenient, in particular to the west of Hackney Wick where found to be lacking in pedestrian and cycle infrastructure.	Noted. Amendment to be made on page 16 as following: "New developments in this location should consider ground floor activation, softer frontages and improved pavements and pedestrian crossings to <u>enable active sustainable modes are attractive and convenient ways to travel.</u> '
Wayfinding and security P.16 (p18)	Should amend text to reference operational requirements for any new venue within the area relating to command and control procedures.	Noted. It is considered that text inserted into page 20 covers the relationship with station management.

<p>Dispersal P.20</p>	<p>Should amend text to reference requirement for a suite of documents for a large venue with leisure component requiring assessment and agreement with statutory stakeholders relating to public transport and highway capacity instead of just Dispersal Strategies. Reference should also be made that low frequency night tub services are not intended to absorb significant pulses of passengers. Dispersal Strategies and Management Plans requirements should reference "forward traffic" as arrivals, phases of peaks and pulses, and "return traffic" and their impacts on pedestrian flows at all times. Need wording to facilitate interaction with station control procedures, dependent on event sizes. Insertion of reference to private hire vehicles and potential disruption to</p>	<p>Amend text to reflect representation content however for consistency make changes as follows:          "Larger schemes with a substantial leisure component (e.g. concert halls, sports venues, nightclubs, or where clusters of A3-A4 uses are created) should provide a dedicated Dispersal Strategy as part of their planning proposal. <u>These should consider the impact of arrivals e.g. queuing and the phasing of dispersal recognising the peaks and pulses generated in as well as how operations will impact upon existing background transport and pedestrian flows at night all times of the day and the smooth managed flow of individuals to transport nodes, internal management arrangements to minimise noise disturbance, staffing levels and staff training including in conflict management.</u>          The arrival and congregation and circulation late at night of taxis, <u>private hire vehicles</u> and other private vehicles creates the potential for disturbance, congestion and a <u>potential negative impact on residential amenity, disruption to local highway network and bus network.</u> Proposals should consider the provision for arrival to ensure how these will be managed safely and not impinge negatively on existing residents and businesses as well as other public realm and highway users, <u>with particular reference to large events.</u></p> <p><u>Proposals for larger venues require assessment and agreement with transport and public realm statutory stakeholders into available public transport and highway network capacity and Event Management Plans should be submitted. They should included consideration of station management procedures. It should be noted that the low frequency Night Tube service is not intended to absorb significant pulses of passengers."</u></p>
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	<p>highway and bus network. Reference to separate defined areas for licenced taxis and do not impinge on residential amenity, public realm or highway users.</p>	
<p>Stratford Metropolitan Centre - Introduction P 25</p>	<p>Need some amendments to the text to reference Stratford Station capacity work and to enhance frequency and need to state that it requires further enhancement, mitigation and management.</p>	<p>Noted. Amendments proposed as follows to recognise Stratford station connectivity improvement projects: The Legacy Corporation has an aspiration for Stratford to become an International Centre and internationally recognised cultural destination which, to be realised, the amount and range of town centre uses should be expanded at this location. As currently a Metropolitan Centre it enjoys exceptionally good access and connectivity (see Figure 6.1) with PTAL levels of 6 and above. Although good, the level of infrastructure <del>is therefore present</del> requires enhancement and mitigation to support a broad range of NTE uses at varying scales. The Legacy Corporation is working with</p>



		<p><u>stakeholders to enhance Stratford station capacity, interchange and local connectivity</u></p>
<p>Area Specific Considerations P.27</p>	<p>Proposed amendments clarifying West Ham name and implications of events on arrival and dispersal and impact on local highways, stations and public realm. Reference to be included to the varying scales of impacts of event sizes and frequencies, not just normal or event days as previous version.</p>	<p>Noted. Text to be amended as follows:          “The significant role of the London Stadium within the <del>the</del> evening and NTE connected to West Ham <u>United FC homes</u> matches and other sporting and entertainment events, is also a key consideration. These events attract large numbers of people and footfall to the area during the evening and nighttime, helping to stimulate and support the nighttime economy. However, there are implications relating to crowd management, <u>arrival and dispersal and impacts on local highways, stations and public realm</u> which will also be need to be considered when planning for any new significant night-time economy uses. New proposals will need to demonstrate sufficient <del>crowd management practices</del> <u>Event Management Plan and mitigation measures for ‘normal’ and ‘eventday’ conditions impacts associated with relevant event sizes and frequencies</u>, or restrictions on operating hours may be introduced.”</p>

<p>Area Specific Considerations P.27</p>	<p>Should have a new sections relating to event management. This should cover design of developments and public realm and how they operate in usual and event day overlay mode. To increase how public realm and wayfinding can be designed to ease of installation and removal including crowd management and temporary barriers without unnecessary disruption to the local highway network and consequences form residents and users of the area. Should also make reference to toilet facilities, security screening locations and stop and hold event management locations.</p>	<p>Noted. Amendments will be made within the text to take account of suggested amendments but due to the level of detail it is felt this would be more appropriate to make some amendments to what is proposed. Text to be inserted as follows:  <u>"Proposals for new large venues or spaces should demonstrate how they propose to operate in business as usual and event overlay modes. This should include how any temporary wayfinding and barriers, or any other infrastructure can be designed and built to enable ease of installation and removal, avoiding unnecessary disruption to the highway network or public realm."</u></p>
<p>Centre Specific Management Principles P30</p>	<p>Suggested amendments to make reference to the two Stratford Stations and ownership of train operating companies.</p>	<p>Noted. Amendments to be made as proposed on page 30: "In turn, there are several transport nodes such as Stratford <u>Regional and International stations</u> which are managed by owners TfL and Network Rail <u>and Train Operating Companies.</u>"</p>
<p>Wider Fish Island P41</p>	<p>Amendments proposed to reduce impacts on walkers and cyclists instead of reference to pedestrians.</p>	<p>Noted. Amendments to be made as proposed on page 41: 'Dispersal Strategies and wayfinding proposals should also look at how to reduce and mitigate the increased risk of <del>pedestrians</del> <u>people walking and cycling</u></p>

		coming into contact with traffic movements related to existing industrial uses.'
Other Centres P46	Typo noted, removal of word.	Noted. Correction to be made to page 46: "However, how <del>that</del> the space is used and managed.."
Puddling Mill P53	Text should emphasis importance of prioritising active and public transport modes. Should reference prioritising walking, cycling and public transport access between locations to make these modes mote attractive and convenient.	Noted. Amendments will be made within the text as follows: 'Linkages and wayfinding to Stratford High Street and the Queen Elizabeth Olympic Park are key to developing night-activity in the area. Proposals should seek to enhance these links, <u>to prioritise walk, cycle and public transport access between these locations in order to make active and sustainable transport modes attractive and convenient.</u> '
General Comment	Document would benefit from a table or diagram showing bodies, providers, police and other groups which should continue to meet or be set up for both planning and licensing arrangement to make more user friendly. This may exist elsewhere to avoid need for further high level consultion to refine and agree.	Noted. Further detail on the bodies to be involved in management groups will be provided within each appropriate section rather than as an appendix. In the interests of confidentiality this will be kept to a strategic level within the document. Add the following to Annex 2: " <u>Management groups proposed within the SPD are proposed to include, but are not limited to: Police, licensing authority representatives, other council services, LLDC officers, landowners and developers and venues</u> ".

General Comment	<p>Thank you for opportunity to comment on SPD. Emerging Tower Hamlets plan supports night-time economy which encourages A3, A4 and A5 uses in town centres as long as they do not impact on viability and vitality, amenity or public health. So support SPD objectives to encourage a range of uses, flexible spaces, focus on town centre uses for night time. Concerned by proliferation of evening and night time venues and uses in residential uses that create conflict which need managing including rubbish, disturbances, anti-social behaviour. This is recognised in design considerations in SPD which is one way to manage conflicts but may also include limiting amount of evening and night-time venues permitted in certain areas to minimise conflicts. More specific comments provided.</p>	Noted.
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Agent of Change Principle	Strong support for Agent of Change principle in SPD which is part of emerging London Plan and Tower Hamlets Local Plan. Principle complements other elements of the SPD to aim to retain venues or cultural importance within the area which are strongly supported.	Noted.
Public Houses	SPD and Local Plan refer to protection of public houses of cultural or heritage value however there is no definition of how a judgement of cultural value will be made. Tower Hamlets Plan aims to protect all public houses unless certain criteria can be met regarding marketing evidence. If a blanket policy like this is not adopted then the SPD should provide more guidance on circumstances of cultural or heritage value.	Noted. The following amendment is proposed to chapter 5 to provide guidance on the assessment of cultural or heritage value within this section: <u>"Assessment of cultural or heritage value of a venue should include detail of the architectural or townscape value, historical value and significance, the community served, the range of functions, the uses the venue provides and proximity of other offers. Any protection of venues provided by the planning system should secure the relevant elements of this assessment."</u>

<p>A5 Uses</p>	<p>Support locating A5 uses more than 400m away from schools which is stronger than Tower Hamlets policy. Requirement to demonstrate how limit amenity impacts is also welcome including concern about dead frontages created through A5 units being shut during daytime hours. However stronger guidance should be provided in relation to clustering of A5 units where SPD says little, with a cross-reference to Policy B.2 which aims to resist harm from such uses. The emerging Tower Hamlets Local Plan provides detailed guidance on what this means in practice, which includes separation by at least 4 non-A5 uses, no more than 5% units in A5 use in centres and no more than one in neighbourhood parades. The SPD could consider including more specific guidance on what is considered unacceptable clustering.</p>	<p>Support welcomed. The SPD is providing greater guidance on Local Plan policy. Policy B.2 in relation to resisting potential harm on vitality and viability caused by A5 and other uses is specifically intended to be flexible and judgement-based. The level of specification proposed is considered too specific for the Legacy Corporation's area and have potential to become a matter of calculation rather than planning judgement.</p>
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Pedestrian Flows	Error identified in relation to creating pedestrian flows too great for pavement width.	This was an error within the original document which will be corrected as follows: 'avoid createing passenger flows that are too great for pavement capacities in a particular town centre'
Licencing and Bromley by Bow	Licensing section states that late night levey may limit the ability of A4 uses to open past midnight, however are unclear of what evidence there is to support this, so this statement should be removed. Late Night Levy applies across whole of the borough and not only Bromley-by-Bow therefore this area does not have any specific prejudice to its activities compared to other locations in borough. The Late Night Levy supports cleaning and security functions in the area therefore supports these uses coming forward in appropriate locations minimising conflict between NTE uses and residential.	<p>Noted. Amendment will be made as proposed to remove reference to limiting post-12am opening and other clarifications to state that the levy applies across the whole of the borough as follows:</p> <p>"Bromley by Bow is a potential District Centre and as such the Local Plan requires the development of a considerable town centre with sufficient leisure facilities both for the growing resident population, as well as the surrounding communities and towns that it will also serve. <u>Fish Island is currently home to a number of licensed premises, and any new locations for licensed premises deemed appropriate through planning policy will be assessed by Tower Hamlets Licensing team</u>".</p> <p>Currently, Tower Hamlets does not have a licensing cumulative impact area <del>for Bromley by Bow</del>, however its Late Night Levy <del>does apply here</del> <u>applies to the whole of the borough</u>, so will be a relevant consideration for any <u>schemes proposing late night uses</u>. <del>Whilst it is not the Local Plan and SPD's intention to create a late night destination in Bromley by Bow, particularly given the strong aspiration for the considerable provision of family homes here (see also Bromley by Bow Town Centre section later), the Late Night Levy may limit the ability of any A4 pub and bars venues to open past midnight. Obviously, this may be appropriate in certain areas of the town centre but less so in others.</del>"</p>

	<p>References in the SPD to using planning conditions to control noise and waste. Should include reference to conditioning opening hours where necessary to protect residential amenity. Should make clear that different opening hours are appropriate in different locations. Only reference to this is in relation to terraces and outdoor spaces but enclose venues could also have effects that warrant such as leaving at unsociable hours.</p>	<p>The licensing section of the SPD deals with the relationships between LLDC as the planning authority and the borough licensing authorities. A reference will be included to the use of planning conditions on page 14 as follows: "Conversely the Legacy Corporation will liaise with the appropriate licensing authority to ensure that the respective planning and licensing approaches are fully cognisant of each other and hours of operation remain, as much as possible, consistent. <u>Where relevant and necessary, planning conditions will be utilised to limit opening hours to as agreed with the licensing authority</u>".</p>
<p>Consultation process</p>	<p>Of the view that the SPD is premature and should wait until the draft Plan has undergone examination and found sound before consulting on the SPD. Although don't intend to adopt prior to local plan adoption this is a 'done deal', making a mockery of the consultation process. Should reconsult once local plan has been adopted and legal challenge period passed.</p>	<p>It is not considered that the SPD is premature as it is not proposed to be adopted prior to the Revised Local Plan. The new draft Local Plan relates to amendments to existing policies, therefore the policies on which the SPD are 'hung' are already included within the Local Plan, with some minor amendments and inclusions. The overall strategy of the Local Plan has not changed substantially and therefore it is appropriate to develop a SPD alongside.</p>



	<p>SPD has disregard for local residents and impacts of forceful promotion of the night-time economy. Has not considered impacts on residents beyond boundary to the east. Accept this is a busy area and growth area and translating London Plan ambitions to local level but should be a sensitive and sustainable approach which balances growth with preserving quality of life of residents. SPD should also consider transport constraints and other infrastructure which cannot cope with additional large-scale developments in particular mega venues with tens of thousand capacity such as MSG proposal. Should reconsider approach and re-draft SPD to balance delivery of night time venues with the needs of local residents.</p>	<p>Planning policies within the area place communities and local residents at the heart. The Legacy Corporation's Statement of Community Involvement highlights how it will consult and engage with communities. The approach taken within the SPD provides guidance on the application of local plan policies including relating to the growth of the Metropolitan Centre with reference to the night-time economy. This reflects the strategy within the Local Plan, in accordance with the draft New London Plan and all due consultation arrangements have been made. A number of local plan policies also deal with impacts of development including design policies (BN.1, BN.4) and air quality and noise (BN.11 and BN.12). It is these policies which will be utilised to determine proposals within the area.</p>
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<p>Principles of the SPD</p>	<p>Welcome on-going engagement on planning and collaborative working on shared Hackney Wick evidence base for seamless transfer of planning powers.</p> <p>SPD encourages the diversification of the night-time uses which is consistent with the London Plan, both Local Plans, and the Shoreditch draft AAP. Support principle of extending opening hours into the evening and community led night-time economy uses. This aligns with Hackney's inclusive economy approach. Support encouraging new uses alongside protecting community facilities approach to hot food takeaway restrictions near schools.</p> <p>Principles align well with Hackney's principles and licensing policies. Town centres first, diverse economy</p>	<p>Support welcomed.</p>
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	<p>and security and wayfinding are important to Council.</p>	
<p>Town Centre First</p>	<p>Complements Hackney's approach supporting night-time economy growth in designated centres and important that SPD recognises that Stratford is Metropolitan Centre, Hackney Wick Neighbourhood and NTE uses should be supported to grow in particular as Creative Enterprise Zone.</p>	<p>Support welcomed.</p>

A Diverse Economy	Diverse night-time activity not solely oriented around food and drink supported. This should serve families and diverse local communities. Reflects strategic vision set out by the GLA, Local Plans and Shoreditch draft AAP. Offer should be safe, attractive and cater for everyone to increase participation from all communities.	Support welcomed.
Licensing	Recommend amendment: "Thus, any planning consent given outside of these hours is likely to <u>may</u> conflict with Hackney's licensing policy. This is where a close alignment between licensing and planning is imperative. "	Amendment to be made as suggested:  "Thus, any planning consent given outside of these hours <del>is likely to</del> <u>may</u> conflict with Hackney's licensing policy. This is where a close alignment between licensing and planning is imperative. "
Wayfinding, Security & Design Considerations	SPD includes measures to improve safety and security and mentions Women's Night Safety Charter. Should clarify how consideration is given to disabled access in Hackney Wick as some of the roads to the west are lacking pedestrian and cycle	Amendment to be made as suggested:  "New developments in this location should consider ground floor activation, softer frontages, <del>and</del> improved pavements, effective disabled access and pedestrian crossings.. "

	infrastructure and considers ground floor activation and pedestrian crossings.	
Hackney Wick and Fish Island	Support for focus of neighbourhood centre for night-time uses. SPD recognises role of Creative Enterprise Zone in strengthening growth of creative industries and ensure diversity of evening and night uses. However should balance this against concerns of local residents and Hackney is working to address this in Shoreditch in the draft AAP where the aim is to make the offer accessible, safe and attractive to all. Needs extend beyond eating and drinking, working patterns are changing and people need to access shops and service beyond daytime hours. All development in Shoreditch should apply the agent of change principle which	Support welcomed.

	<p>reflects guidance also set out within the NTE SPD.</p>	
<p>Management Principles (Hackney Wick and Fish Island)</p>	<p>Welcome partnership approach to managing the night-time economy and further discussion is needed in the terms of reference and scope of the management groups. Who would be managing this, would it be the LLDC planning team? to futureproof the SPD should also include developer engaging with the borough regeneration teams rather than just the office of the Developer and Business Engagement Manager as currently included in SPD.</p>	<p>The Legacy Corporation will continue to engage with the respective boroughs and all stakeholders in the establishment, role and remit of the management organisations. Amendment to be included to reference engagement with the borough regeneration teams:  <u>"Developers and investors should consider engaging with this office and that of the respective borough regeneration teams in the preparation of planning applications to identify how their application can support the Legacy Corporation's aspirations and objectives for Hackney Wick and Fish Island."</u></p>



# APPENDIX 2 - QUESTIONNAIRES

## **Review and update of the draft Night-time Economy SPD:**

Questionnaire for those living and working within the LLDC area

COVID-19 has changed the way we live, work and shop, potentially in a long term. It has also accelerated changes that were already underway in town centres, such as the shift to online shopping. However, the pandemic has also emphasised how town centres are vital for residents who rely on walking to their nearest centre for everyday essentials, groceries and other services. With more people now working from home and spending time locally, in addition to their retail function, they have the potential to become a place where people go more frequently to socialise, dwell, work and consume cultural and other services. With the focus on planning for the future, there is an opportunity to positively respond and embed the changes to ensure that town centres and local business can adapt and thrive and continue to serve needs of local communities.

## **What is the aim of the consultation?**

To be able to plan and respond positively to these rapid changes it is essential to understand better how the pandemic has impacted local town centres and the business who operate within them. This consultation is seeking views from local residents and business who operate within the area to understand the extent of the changes and trends already occurring at a local level, and identify how they see their local town centres developing in the future.

## **What will happen following this consultation?**

The LLDC is about to review its Draft Night-time Economy SPD to ensure that the guidance provided for town and local centres remains relevant and allows centres to adapt, to grow and to thrive in the long-term. The LLDC will analyse the comments received and use these to prepare a consultation report that will set out information about the key findings and trends. This information will be used to help inform any changes to the Night-time Economy SPD and help it to remain relevant in a post-COVID world.

The consultation report will be included within the evidence base that will be built up over time to inform any further work that LLDC or the partner organisations may undertake in the future, such as preparation of other supplementary planning documents, future planning policies, regeneration initiatives and masterplan solutions.



## Questions for residents and those working in the LLDC area

- I live in the area
- I live and work in the area
- I work in the area

Please indicate which is your closest town centre:

- Stratford City
- East Village
- Hackney Wick and Fish Island
- Stratford High Street
- Other: please state

- 1. What are your main reasons for normally visiting your local town centre? Have your reasons changes since the start of the pandemic and why?**
- 2. Has your local town centre met your daily needs since the start of the pandemic?**
- 3. Has the frequency of your visits to your local town centre changed since the start of the pandemic? If the frequency of your visits has changed, what are the main reasons for this change?**
- 4. Has the timing of your usual visits to your local town centre changed? If the times of your visits have changed please could you tell us something about why this has changed?**
- 5. Do you think that the opening hours of shops, services, and other town centre uses in your local town centre correspond to your need and the needs of your local community?**
- 6. What could your local town centre offer that it does not already; are there shops, services or other uses you think are missing?**
- 7. Do you expect to do more online shopping after the pandemic than you did before?**
  - Yes
  - No
- 8. What do you think town centres could do to positively respond to the increase in internet shopping (e.g. click-and-collect facilities, showrooms, multi-channel retail)?**
- 9. Many people may continue to work remotely in the longer term. What do you think will be necessary to ensure that town centres can adapt to changes in the way people work?**
- 10. Do you see your local town centre as somewhere you can meet other people and socialise (both before and during the pandemic)?**
- 11. What type of space or facilities are missing to make your local town centre a place where people will want to meet, socialise and dwell?**
- 12. How inviting is your local town centre public realm currently? What elements of the public realm do you think are good and bad?**
- 13. How did you get to your local town centre before the Pandemic, did you usually travel by:**
  - Walking
  - Cycling
  - Public transport
  - Car

**14. Have you changed how you get there now and if so what is now your main mode of travel?**

- Walking
- Cycling
- Public transport
- Car

**15. What can be improved to incentivise more people to walk or cycle to your town centre?**

Thank you for taking time to complete the questionnaire.

## Questionnaires for local businesses

- 1. Please indicate type of your business: (restaurant, grocery, book shop, gym etc.)**
- 2. Please indicate the size of your business**
  - Sole trader/freelancer
  - Small (2-10 people)
  - Medium (10-50)
  - Large (50-100)
- 3. Your business is:**
  - Independent
  - Part of a chain of businesses or franchise
- 4. During the two lockdowns, Spring and autumn 2020, your business was:**
  - closed
  - continued to operate with reduced service due to the social distancing measures or demand
  - continued to operate with an increased demand
- 5. Your business provides service to:**
  - Local residents
  - Wider area
  - Both
- 6. If your business remained open, please indicate what effects Covid-19 has had on average monthly footfall into the premises**
  - Positive
  - Neutral
  - Negative
- 7. During the pandemic, have you considered other business models complementary to your service to meet the changing demands (online shopping, takeaways or similar), if applicable**
  - If yes – what have you found to be the main challenge in introducing new services (licensing, obtaining planning permission where necessary, design/adaptability constrains...)
- 8. In September 2020, the Government introduced a new Planning Use Class Order that introduced a new Use Class E ‘Commercial, Business and Service’ which brings together/subsumes existing retail uses such as shops, ,financial and professional services, and cafes, and business and some other and non-residential institutions, including assembly and leisure into one single “Class” to allow for changes of use without the need of planning permission.**
  - What implications do you think that this flexibility may have on the way you operate your business and use the space, if any?
  - What do you think are the main benefits or challenges that this may have on your business and/or local businesses in general?
  - What impact do you think this may have on the local town centre within which your business operates?
  - Do you think that different types of uses can successfully run concurrently or at different times of the day? What do you think would be the main challenges and benefits of this?
- 9. How do you think online shopping, or if more relevant to your business, use of online media to consume entertainment and culture, is changing the way you operate your business and what impact do you think it has on town centres?**
- 10. Please provide any other comments in relation to planning for recovery post-COVID 19 and adapting to changes to the role of businesses in town centres?**