

ROYAL GREENWICH RETAIL & LEISURE STUDY

Volume A: Final Report

Prepared for:

Royal Borough of Greenwich

November 2025

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1. INTRODUCTION

1. Lambert Smith Hampton (LSH) was instructed by Royal Borough of Greenwich ('the Council' or 'RBG') in October 2024 to prepare a Retail and Leisure Study ('the Study') for Royal Greenwich. The Study will specifically update the Council's current town centre evidence, the Greenwich Retail and Leisure Study 2018 ('2018 GRLS').
2. The Council is currently in the process of updating the adopted Local Plan for Royal Greenwich. This Study will provide the updated robust and sound evidence base that is needed to help formulate strategies and policies specific to retail and other main town centre uses in the new Local Plan.
3. Since the 2018 GRLS was prepared, the UK has experienced major economic and social events (e.g. COVID-19 pandemic, energy and cost of living crisis, inflation, and a rise in interest rates) that have impacted on how we shop, work and use our town centres. As such, there is a need to review the town centre evidence to ensure that the policies within the emerging Local Plan continue to be appropriate and capable of providing the policy guidance required to achieve the Council's development objectives.
4. As such, this new study takes account of current and predicted market trends, and the recent impact of the pandemic on town centres and high streets as places to shop, live, work, study and visit for a wide range of uses and activities. It has been conducted in accordance with current policy and guidance pertaining to retail and town centre uses, and employment land at the national and local level, including the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).
5. Notwithstanding the economic uncertainties highlighted above, this study does provide the robust evidence base and key findings to help inform and guide both plan-making and decision-taking across Royal Greenwich and its main centres during the new Local Plan period. Whilst the study will assess outputs up to 2037, any findings beyond 2035 should be treated with caution on the basis that forecasts become less reliable after a 10-year period.
6. The study is underpinned by an assessment of baseline and forecast population and retail and leisure expenditure across a defined Study Area, which comprises four zones. The Study Area is also used to identify the pattern of distribution of retail and food and beverage expenditure using transactional data from Experian Insights. The Study Area is discussed further in Section 4 of this report (**Volume A**) and is presented on a plan in Volume B.
7. The study is presented in a series of inter-related Volumes:
 - **Volume A**, this report document, sets out the findings of the study and its inter-related tasks, which are described later in this section.

- **Volume B** sets out the findings of the 2025 town centre health check assessments of Eltham and Woolwich major town centres, and the district centres of Blackheath, East Greenwich, Greenwich West (also known as Greenwich Town Centre), Lee Green, Plumstead, and Thamesmead. A review of retail and leisure offer at North Greenwich is also considered.
 - **Volume C** contains the full retail capacity assessment and commercial leisure needs assessment. Volume B is accompanied by appendices which include the Study Area plan, the Experian Insights transactional data, the quantitative analysis, the economic capacity tables for retail needs over the period to 2037, and assessment tables on commercial leisure expenditure; and
 - **Volume D** provides advice on a recommended local floorspace threshold to apply to proposals for retail and leisure schemes that are not located within a defined centre.
8. This Volume draws on the evidence and research in **Volumes B, C, and D**. It provides robust policy recommendations to help the Council prepare positive strategies, plans and policies for the growth, management, and adaptation of Royal Greenwich's designated town centres over the short, medium and long term to help ensure their future vitality and viability.
9. For ease of reference this Study (**Volume A**) is divided into the following inter-related sections:
- **Section 2** reviews the national, regional, and local planning policy context.
 - **Section 3** highlights some of the key trends that are driving the dynamic changes in the retail and leisure sectors at the national and regional level.
 - **Section 4** provides a summary Strengths, Weaknesses, Opportunities and Threats (SWOTs) assessment of the borough's town and district centres. The SWOTs are informed by full assessments contained in **Volume B**.
 - **Section 5** reviews current retail and leisure offer in the Charlton Riverside area and how it influences the distribution of retail expenditure. This evidence is used to inform advice on whether policies are required to manage new retail and leisure development for the Charlton Riverside area.
 - **Section 6** summarises the findings of the strategic retail capacity assessment for new convenience and comparison goods retailing up to 2037 based on LSH's in-house CREAT^e economic model, Experian Insights transaction analysis, and the commercial needs assessment detailed in **Volume C**.
 - **Section 7** draws on the previous sections and provides recommendations to help inform the Council's preparation of policies aimed at maintaining and enhancing the vitality and viability of the borough's town and district centres over the lifetime of the plan.

2. POLICY ANALYSIS

10. To help inform the preparation of this study, this section provides a summary of the key national, regional, and local planning policies pertaining to retail, leisure and other main town centre uses.

National Planning Policy Framework (NPPF)

11. The NPPF was updated in December 2024 and sets out the Government's planning policies for England. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF must therefore be considered in plan-making and is a material consideration in planning decisions.
12. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF (paragraph 11) sets out the Government's view of what the presumption in favour of sustainable development means in practice. For plan-making: "...plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change" (paragraph 11a).
13. Chapter 3 ('Plan-Making') of the Framework provides guidance to local authorities on preparing local plans. Paragraph 20 states that policies should set out an overall strategy for the location, scale, and quality of development, and make sufficient provision for new sustainable development. It requires that strategic policies should look ahead over a minimum 15-year period from adoption, except in relation to town centre development (see below). In preparing development plans, "policies should be underpinned by relevant and up-to-date evidence" (paragraph 32). To ensure the local plans and spatial strategies are relevant they should be reviewed at least once every five years and updated as necessary (paragraph 33).
14. Chapter 7 ('Ensuring the vitality of town centres') provides guidance on plan-making and decision-taking for retail and other town centre uses. Paragraph 90 states that "planning policies and decisions should support the role that town centres play at the heart of local communities" and sets out criteria that local authorities should consider when preparing planning policies. These include: (a) defining a network and hierarchy of centres; (b) defining the extent of town centres and Primary Shopping Areas (PSAs); (c) retaining and enhancing existing markets; and (d) allocating a range of suitable sites in town centres to meet the sales and type of development likely to be needed, "looking at least ten years ahead".
15. Paragraphs 91-95 specifically set out the requirement to apply the sequential and impact tests to determine applications for new retail, leisure and main town centres

that are neither in an existing centre, nor in accordance with an up-to-date development plan.

16. Other Chapters in the NPPF are also relevant to the preparation of this study, and to the Council's plan-making and decision-taking policies for its network and hierarchy of centres. For example, Chapter 8 ('Promoting healthy and safe communities') sets out the need to achieve healthy, inclusive and safe places; including the need to plan positively for the provision and use of shared spaces, community facilities (such as local shops) and other local services to enhance the sustainability of communities and residential environments (paragraph 97a).

Planning Practice Guidance (PPG)

17. PPG provides specific guidance on plan-making and decision taking for retail, leisure and town centre, including guidance on Permitted Development Rights (PDR), Article 4 Directions, and the revised Use Classes Order ('UCO') that came into effect on 1st September 2020 (discussed later in this section). The Guidance supports the policies and provisions of the NPPF, placing significant weight on the development of positive plan-led visions and strategies for town centres.
18. In terms of planning for town centres, the PPG states that a wide range of complementary uses can, if suitably located, help to support the vitality and viability of town centres. These include residential, employment, office, commercial, leisure/entertainment, healthcare, and educational development. Evening and night-time activities also have the potential to increase economic activity within town centres and provide additional employment opportunities.
19. Paragraph 004 of the PPG (004 Reference ID: 2b-004-20190722) sets out the importance of evidence-based strategies and visions for town centres to help establish their role and function over the plan period, the need for new retail, leisure and town centre uses, and other interventions. However, given the uncertainty in forecasting long-term retail trends and consumer behaviour, the PPG states that forecasts "...may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed." In those cases where development cannot be accommodated in town centres, the PPG requires planning authorities to plan positively to identify the most appropriate alternative strategy for meeting the identified need, having regard to the sequential and impact tests. Paragraph 006 of the PPG (006 Reference ID: 2b-006-20190722) also sets out several Key Performance Indicators (KPIs) that "may be relevant in assessing the health of town centres, and planning for their future".

Use Classes Order & Permitted Development Rights

20. The Government has issued a series of reforms to the planning system since the completion of the 2018 GRLS that are relevant to this new study. The reforms principally relate to PDR and the UCO.

21. The revised UCO came into effect from 1st September 2020 and is relevant to the Council's plan-making and decision-taking on new retail, leisure and town centre uses. The new UCO amended and revoked a number of use classes under the 1987 Order and has replaced them with much broader use classes. In summary, the main reforms introduced by the new UCO include:
 - a new Class E (commercial, business and service uses): which subsumes the former Use Classes A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafés). It also incorporates: the former Class B1 (commercial, business and service uses), comprising office, research and development and light industry; Class D1 (non-residential institutions) in part, comprising medical or health services, clinics, crèches, day nurseries and day centres; and Class D2 (assembly and leisure) in part, comprising gyms or areas for indoor recreation.
 - a new Class F1 (learning and non-residential institutions): which includes some of the former uses under Class D1 (non-residential institutions), including museums, public libraries, art galleries, schools, and places of worship.
 - a new Class F2 (local community uses): which comprises (former Class A1) shops defined as being "...not more than 280 sqm mostly selling essential goods, including food, and at least 1km from another similar shop". This Use Class also includes former Class D2 (assembly and leisure), such as meeting places/halls, indoor/outdoor swimming baths, skating rinks, and outdoor sport and recreation.
 - an extension to the Sui Generis uses (which fall outside the specified use classes) to include the former Use Classes A4 (pubs and drinking establishments) and A5 (hot food takeaways). It also incorporates some uses previously classified under D2 (assembly and leisure), including cinemas, concert halls, live music venues, bingo, and dance halls.
22. Changes of use within a defined Use Class are not considered to be development and as such do not normally require planning permission. As a result, the ability to restrict the use of an existing premises to retail or another specific town centre use has now been largely removed.
23. The Government also issued the revised PDR on 1st August 2021 that permits the change of Class E to Class C3 (residential), subject to prior approval applications. This PDR replaces the two existing commercial to residential PDRs under Class O (office to residential) and Class M (conversion of shops, financial services, betting offices and pay day loan or mixed uses to residential), with a new Class MA (allows the conversion of buildings in Class E to residential homes Class C3). In launching the PDR, the Government stated that the regulations will give "...greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings." Although it does not apply to Listed Buildings, it can be applied in a

Conservation Area (subject to an impact assessment if it involves converting the ground floor).

Article 4 Directions

24. Article 4 Directions are a tool used by local authorities to remove national PDR, if warranted and supported by robust evidence.
25. The Government supports the use of Article 4 Directions in a “highly targeted way” to protect core high street areas whilst not restricting the ability for much needed housing to be delivered.
26. The Royal Borough of Greenwich has 8 Article 4 direction areas that are mostly in conservation areas which mainly relate to preserving heritage features.
27. The Royal Borough of Greenwich made a non-immediate Article 4 direction to withdraw the permitted development right of Change of Use from Class E (Commercial, Business and Service Uses) to Class C3 (Residential) across parts of a number of retail centres within the borough in August 2022. This was confirmed and came into force August 2023. The centres affected include Eltham High Street Major Centre, Woolwich Major Centre, Blackheath District Centre, East Greenwich District Centre, Greenwich District Centre, Lee Green District Centre, and Plumstead District Centre, as well as the majority of the neighbourhood parades.

DEVELOPMENT PLAN CONTEXT

28. Development Plan Documents (DPDs) are defined in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The DPDs guide the development and use of land, allocate sites for development and provide strategic and development management policies to support and manage growth. The adopted DPDs for RBG are as follows and are reviewed below:
 - The Royal Greenwich Local Plan (adopted July 2014)
 - Core Strategy (adopted July 2014)
 - Policies Map (adopted 2014)
 - Site Allocations ‘saved’ from the 2006 Greenwich Unitary Development Plan
29. In addition to the DPDs, a number of Supplementary Planning Documents, Planning Briefs, and procedural documents form part of a wider local planning policy framework:
 - Urban Design Guide (adopted October 2023)
 - Spray Street (January 2015)
 - Greener Greenwich (adopted February 2015)
 - Thamesmead and Abbey Wood Opportunity Area Planning Framework (adopted December 2020)
 - Kidbrooke Area (adopted June 2008)

- Greenwich Town Centre Masterplan (January 1999- December 2016)
- Woolwich town centre masterplan (April 2012)
- Eltham town centre masterplan (April 2012)
- Charlton Riverside masterplan (June 2017)
- Greenwich Peninsula West masterplan (April 2012)
- Planning obligations (July 2015)
- Greenwich Peninsula Site GP3 (October 2017)
- Procedural Documents
 - Statement of Community Involvement (adopted September 2024)
 - Developer's Engagement Charter (adopted September 2024)
 - Local Development Scheme (December 2024)
 - Authority Monitoring Reports
 - Housing Delivery Action Plan 2021 (October 2021)

The London Plan (2021)

30. The London Plan 2021 is the Spatial Development Strategy for Greater London which sets out an integrated economic, environmental, transport and social framework for London over the next 20-25 years. Chapter One sets out the Mayor's vision for "Good Growth," which is defined as "growth that is socially and economically inclusive and environmentally sustainable". The London Plan Key Diagram presents the spatial vision, covering London's growth corridors, Opportunity Areas, town centres, Green Belt and Metropolitan Open Land. Chapter Two sets out the overall spatial development pattern for London, focusing on the growth strategies for specific places in London and how they connect with the wider South East region. Chapters 3-12 provide the topic-specific policies that are required to deliver the "Good Growth" objectives.
31. The plan includes a number of policies which relate to retail and town centres. The London Plan (Annex 1 and Table A1.1) defines Eltham and Woolwich (in Royal Greenwich Borough) as Major Town Centres, which typically contains over 50,000 sqm of retail, leisure, and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. The centres would be expected to have a borough-wide catchment.
32. Woolwich is identified as having the potential to be re-classified in the future as a Metropolitan Town Centre meaning that it could contain at least 100,000 sqm of retail, leisure, and service floorspace with a significant proportion of high-order comparison good relative to convenience goods.
33. The London Plan also identifies 4 District Centres in Royal Greenwich– East Greenwich, Greenwich West, Plumstead and Thamesmead, and 2 District Centres in Royal Greenwich and Lewisham boroughs– Blackheath and Lee Green. These are seen as centres that provide convenience goods and services and social infrastructure for more local communities.
34. Various centres are seen as having growth potential in terms of commercial uses, which includes town centres with moderate levels of demand for retail, leisure, or

office space and with physical and public transport capacity to support it. Centres with potential for growth from residential development are also identified, as are centres within Strategic Areas for regeneration. The most important centres for night-time economies are also classified.

35. For Royal Greenwich this can be summarised as follows:

- Eltham is a Major Centre with low commercial growth potential and high residential growth potential. The centre is within a strategic area for regeneration.
- Woolwich is a Major Centre within the NT3 night-time economy classification (a night-time economy with more than local significance) with medium commercial growth potential and high residential growth potential. The centre is within a strategic area for regeneration.
- East Greenwich is a District Centre with low commercial growth potential and high residential growth potential. The centre is within a strategic area for regeneration.
- Greenwich West is a District Centre within the NT3 night-time economy classification with low commercial growth potential and incremental residential growth potential.
- Plumstead is a District Centre with a low commercial growth potential and medium residential growth potential. The centre is within a strategic area for regeneration.
- Thamesmead is a District Centre with low commercial growth potential and high residential growth potential. The centre is within a strategic area for regeneration.
- Blackheath is a District Centre within the NT3 night-time economy classification with low commercial growth potential and incremental residential growth potential. The majority of the centre is in London Borough (LB) of Lewisham.
- Lee Green is a District Centre with a low commercial growth potential and medium residential growth potential. The majority of the centre is within the LB of Lewisham.
- North Greenwich is identified as having the potential to be re-classified in the future as a District Centre within the NT1 night-time economy classification (a night-time economy of international or national significance) with high commercial growth potential and high residential growth potential. The unclassified centre is within a strategic area for regeneration.

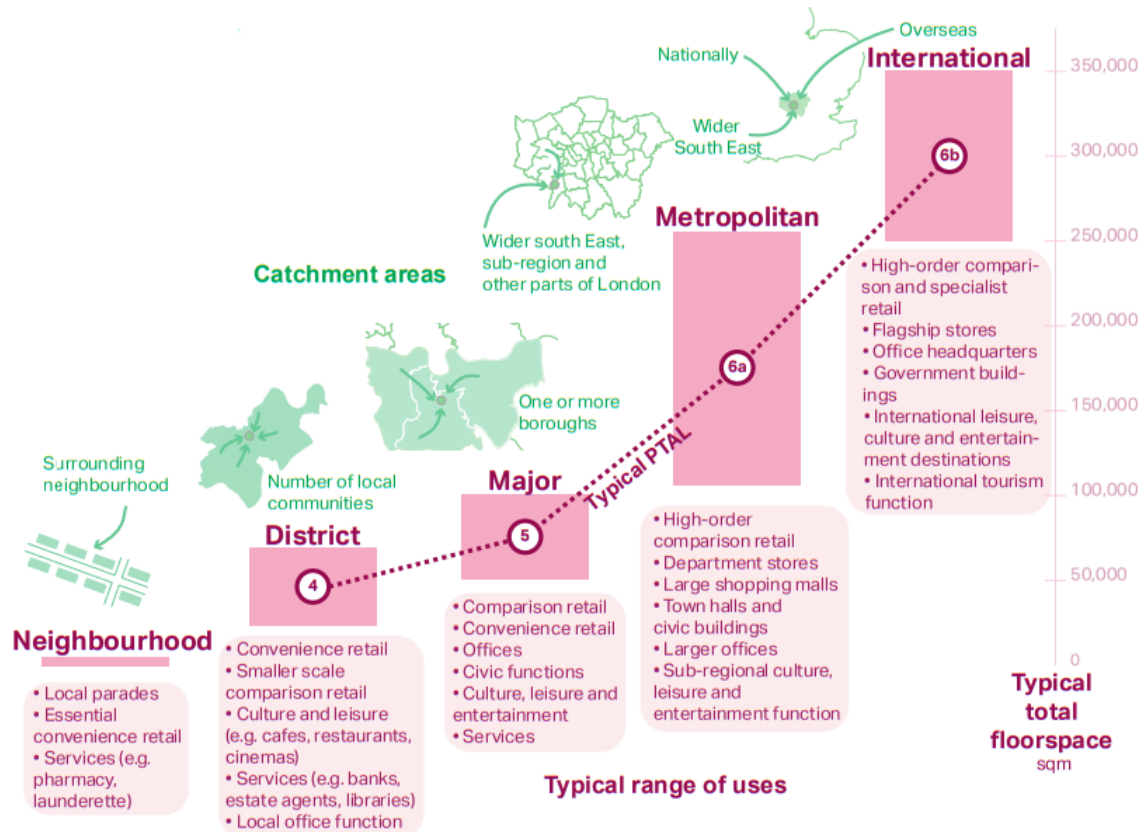
36. The relevant London Plan policies are set out below:

37. **Policy GG5 Growing a Good Economy** states that those in planning and development must promote the strength and potential of the wider city region and ensure that the London's economy diversifies.

38. The London Plan “**Opportunity Areas**” (OAs) (Policy SD1) are identified as having the greatest potential to accommodate substantial new housing, commercial development, and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Each OA (listed in Table 2.1 of the plan) typically has capacity for at least 5,000 net additional jobs or 2,500 net additional homes, or a combination of the two. Royal Greenwich has three OAs that fall entirely within the borough area, Woolwich OA, Charlton Riverside OA, and Greenwich Peninsula OA. An additional three OAs include areas of neighbouring authorities: Thamesmead/Abbey Wood OA (extends within LB Bexley); Deptford Creek/Greenwich Riverside OA (mostly falls within LB Lewisham) and New Cross/Lewisham/Catford OA (mostly falls within LB Lewisham).
39. **Policy SD6 Town Centres and High Streets** Policy SD6 Town Centres and High Streets supports the vitality and viability of London’s town centres. The key themes in Policy SD6 include encouraging strong, resilient, accessible, and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses (A(1)). The role of town centres as a main focus for Londoners’ sense of place and local identity should be strengthened (A(4)) and town centres should be the primary location for commercial activity beyond the CAZ (A(5)). Part B supports the need for “adaption and diversification” and the management of vibrant daytime, evening and night-time economies should be promoted (Part F). The potential for new housing is also recognised.
40. **Policy SD7 Town Centre: Development Principles and Development Plan Documents** takes a town centres first approach and discourages out-of-centre development of main town centres uses through the application of the sequential and impact tests. It also includes that Development Plans should assess need for main town centre uses, allocate sites to accommodate identified need within town centres and should allocate appropriate edge-of-centres sites if suitable and viable town centres sites are not available. Development Plans should also define the detailed boundary of town centres in policy maps. Consider the protection of out-of-centre high streets and develop policies through strategic and local partnerships approaches, in accordance with other town centre policies. Development Plans should also develop policies for edge-of-centre areas, revising shopping frontages where required, identify centres that have particular scope to accommodate new commercial and housing growth having regard to the growth potential set out in Annex 1 of the London Plan.
41. **Policy SD8 Town Centre Network** recognises that the roles of town centres are changing and require active management in relation to the town centre network as a whole (Figure 2.17 and Annex 1). The classification of higher order centres can only be changed through the London Plan (Eltham and Woolwich) but district, local and neighbourhood centres and CAZ Retail Clusters can be brought forward through Local Plans.

42. The role of different types of centres is set out and summarised in Figure 2.18 – Town centre classifications (reproduced below) and the broad policy guidelines for individual centres is set out in Annex 1.

Figure 1: Town Centre Classifications



Source: London Plan 2021, Figure 2.18

43. **Policy SD9 Town Centres: Local Partnerships and Implementation** states that strategic and local partnerships should be supported and encouraged to develop strong, resilient, and adaptable town centres. Part B encourages the development of Town Centre Strategies with particular emphasis placed on centres undergoing transformative change, have projected declining demand, have significant infrastructure planned or are identified as future potential centres in Table A1.1. Part C states that regular town centre health checks should be undertaken to inform policy; and Part D covers the introduction of Article 4 Directions where appropriate and justified to remove PDR to sustain town centre vitality and viability.
44. **Policy SD10 Strategic and Local Regeneration** provides mayoral support for regeneration and requires Boroughs to (1) identify strategic areas for regeneration in Local Plans (as illustrated in Figure 2.19) and (2) to identify Local Areas of Regeneration, taking into account local circumstances.
45. **Policy E9 Retail, markets and hot food takeaways** states that in preparing or reviewing Development Plans, Boroughs should: (i) identify future requirements

and locations for new retail development; (ii) identify areas for consolidation of retail space where this is surplus to requirements; and (iii) set out policies and site allocations to secure an appropriate mix of shops and other commercial uses, informed by local evidence and town centre strategies.

46. Part C sets out further requirements for Development Plans and proposals, including:
 1. Bringing forward capacity for additional comparison goods in Metropolitan town centres;
 2. Supporting convenience retail in all town centres and particularly District, Local and neighbourhood centres;
 3. Providing a policy framework to enhance local and neighbourhood shopping facilities and preventing the loss of essential retail facilities;
 4. Identifying areas that are under-served and supporting the provision of additional facilities;
 5. Supporting London's markets;
 6. Managing existing edge-of-centre and out-of-centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policies SD6-SD9; and
 7. Managing cluster of retail and associated uses having regard to their positive and negative impacts.
47. Parts D and E state that where development proposals contain hot food takeaway uses, these should not be permitted within at 400 metres of entrances/exits to schools, or a locally determined boundary. Boroughs should also manage the over-concentration of A5 hot food takeaway uses within town centres and elsewhere through the use of locally defined thresholds. Where permitted hot food takeaways should be encouraged to comply with the Healthier Catering Commitment standards. Finally, Part F states that development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (in accordance with Policy SD7).
48. **Policy E10 Visitor Infrastructure** seeks the strengthening of London's visitor economy and associated employment. This includes conserving, enhancing and promoting the special characteristics of major clusters of visitor attractions; ensuring a sufficient supply of serviced accommodation; the provision of high quality convention facilities in town centres and in and around the CAZ; promoting strategically important serviced accommodation in Opportunity Areas and smaller-scale provision elsewhere in the CAZ and town centres.
49. **Policy HC6 Supporting the night-time economy** states that Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity (Zone NT1 and NT2), building on the Mayor's vision for London as a 24 – hour city. Within the policy it also states that NT3 areas are areas with more than local significance. Part B states that Development Plans, town centre strategies and planning decisions should:

- Promote the night-time economy, where appropriate, particularly in the CAZ, strategic areas of night-time activity and town centres where public transport is available;
- Improve access, inclusion and safety, to make places more welcoming for all night-time economy users and workers;
- Diversify the range of night-time economies, including extending the hours of existing daytime facilities;
- Address the issues arising from cumulative impacts including anti-social behaviour;
- Ensure night-time venues are well-served with safe and convenient night-time transport; and
- Protect and support evening and night-time cultural venues.

Royal Greenwich Local Plan: Core Strategy

50. The Local Plan was adopted in July 2014 and includes the following policies directly relevant to the retail and town centre uses. It is these policies that will be reviewed as part of the new Local Plan retail and leisure evidence preparation and our advice on the need for updates to these policies is provided later in the report.

- **Policy TC1: Town Centre** which sets out that town centres are the preferred location for major retail, leisure, cultural, office and other uses that attract and serve the public. The policy supports the town centre hierarchy of major, district and local centre and its neighbourhood parades. Residential development in town centres is supported. In line with the NPPF, sites for main town centre uses should be identified through the sequential approach.
- **Policy TC2: Woolwich Town Centre** which supports development that contributes to the reclassification of Woolwich as a Metropolitan Centre. The policy also seeks to accommodate the majority of additional town centre development in Royal Greenwich over the plan period including:
 - Additional and improved comparison retail floorspace;
 - Office development;
 - Leisure, cultural and tourism uses that contribute towards the evening vitality of the Centre and increase economic benefit.
- **Policy TC3: Eltham Town Centre** which supports the enhancement of the centre as the pre-eminent town centre in the south of the Borough through redevelopment within the existing Town Centre boundary, including:
 - Additional and improved retail space;
 - Improving the range of restaurants and leisure facilities.

- **Policy TC4: Greenwich Town Centre** which seeks to enhance the existing historic character whilst also promoting the multi-functional role of Greenwich as a District Centre, a tourist destination, and a centre for tertiary education. The Borough supports:
 - Additional retailing;
 - Developments that will encourage tourists to stay longer.
- **Policy TC5: North Greenwich District Centre** which sets out that the new leisure-led district centre complementing The O2 Arena will support a specialist role in catering for the entertainment and leisure needs of visitors, workers and residents. The district centre will comprise:
 - Sports, leisure, and retail outlets in the vicinity of The O2;
 - New high quality office space.
- **Policy TC6: Other District Centres** which states that retail developments in district centres of an appropriate scale and that does not harm the vitality and viability of other centres, particularly Woolwich, will be supported. Improvements to comparison retail offer in Thamesmead, Blackheath and Lee Green will be supported.
- **Policy TC7: Local Centres and Neighbourhood Parades** which supports the enhancement of local centres and neighbourhood parades and encourage retail and services that are appropriately scaled to serve the needs of their local catchment. The policy states that a new local centre will be created at Kidbrooke which will include a supermarket and additional small-scale retail, leisure and service uses.
- **Policy EA 1: Economic Development** states that the Borough supports the expansion of existing business and increased employment opportunities. High quality jobs will be created by:
 - Concentrating retail, leisure, cultural and office development within the hierarchy of town centre, particularly improving the quality and position of Woolwich Town Centre (Policy TC2).
 - Designating a new leisure-led District Centre at North Greenwich encompassing the O2 Arena and surrounding area (Policy TC5).

Supplementary Planning Documents (SPDs)

51. Royal Greenwich has eleven approved Supplementary Planning Documents (SPDs) which are part of the Borough's Local Development Framework. Policies relevant to retail and other town centre uses within these plans are set out below.
52. **Spray Street Masterplan SPD** includes aims to contribute to Woolwich's growth in a Metropolitan Town Centre, expand and improve the cultural and leisure offer to create a destination that attracts and retains people within Woolwich Town Centre.

53. **Thamesmead and Abbey Wood (Opportunity Area Planning Framework)** seeks to ensure that future investments and growth in the opportunity area strengthens local identity, delivers wider regeneration benefits, and is planned on the basis of its potential to improve the quality of life for both existing and new residents. In relation to town centres and the economy, the framework aims to create vibrant, well connected town centres that encourage employment and support local businesses and commercial activity.
54. **Woolwich Town Centre Masterplan SPD** provides a framework that will facilitate the regeneration of Woolwich Town Centre by expanding the offer of the town to grow into a Metropolitan Centre, designate a site for anchor retail at the western end of Powis Street, identify areas for leisure, community and cultural uses within the town centre, and establish development sites that can deliver further retail within the town centre.
55. **Eltham Town Centre Masterplan SPD** sets out a new vision for the town centre to become an excellent local town centre for people who live and work in the local area. The masterplan aims to revitalise the town centre with a range of high-quality retailers and enhance the high street. Objectives include improving retail quality in the town centre, increasing the number of café and restaurants and improving the evening economy, creating high quality and attractive shop fronts throughout the town centre.

OTHER MATERIAL CONSIDERATIONS

56. Other documents that do not form part of the adopted Development Plan but are relevant to the current review comprise the following:

Emerging Local Plan

57. Royal Greenwich is producing a new Local Plan to replace the adopted Core Strategy which will set out the council's vision for development in the borough over the 15-year period 2022-2037. The Council undertook a consultation on key themes to help draft the Local Plan between July 2023 to September 2023 and underwent a Call for Sites process for potential development sites between April 2024 to July 2024. The next consultation on the Draft Plan is now scheduled for Winter 2025.

Retail and Town Centre Evidence Base

58. The retail and town centre policies contained in the current adopted Local Plan for Royal Greenwich Borough were informed by the Greenwich Retail and Leisure Study 2018 (2018 RLS). The 2018 RLS findings relevant to the centres and the retail capacity and leisure needs assessments are discussed within the relevant parts of this report.

POLICY SUMMARY

59. This policy review has considered both what is required of the Council as a local planning authority in terms of developing local plan policies, and the current policies that apply to town centres and main town centre uses including retail.
60. In summary, national and local plan policy and guidance seeks to maintain and grow the vitality and viability of centres over time by, amongst other measures, directing new investment and development to town centres first and promoting a diverse mix of sustainable uses that meet the needs of all those who live, work, shop and visit centres for a wide range of activities.
61. The current policies generally reflect these requirements but require review to reflect recent changes to the UCO and PDRs, as well as to reflect the significant changes seen nationally and within Royal Greenwich in the retail and leisure offer and consumer shopping patterns. There have also been major economic upheavals affecting consumer spend and business costs. This report therefore provides an update to both the quantitative and qualitative retail and town centre evidence base to inform the Council's emerging Local Plan. It then provides advice on what changes or new policies may be required.
62. This follows our review of town centre and retail market trends, retail capacity, leisure needs assessment, and the health checks for the main centres.

3. CURRENT TRENDS AND ECONOMIC OUTLOOK

63. Key economic, consumer and property market trends have driven considerable change in the retail and leisure sectors over the last decade. We will look at how town centres can respond to these dynamic trends to remain competitive and enhance their overall vitality and viability in the future.
64. While it has been a number of years since the COVID19 pandemic its impact is still being felt having created one of the toughest trading environments for the retail and leisure sectors. The post pandemic phase has been characterised by low growth, rising inflation, and the cost-of-living crisis, which has followed the successive Government. Measures to curb inflation have resulted in further pressure on household budgets and business costs.
65. As such, economic forecasts and dynamic trends discussed in this section could change over the short to medium term depending on how the Bank of England respond to the latest increase in inflation and any fiscal reforms that may emerge in response to the next Government Budget review.

UK ECONOMY AND OUTLOOK

66. Over the past five years, the UK economy has endured multiple shocks including the COVID-19 pandemic, high inflation, elevated energy costs, supply chain disruptions, and trade tensions. Despite these challenges, the Office for Budget Responsibility (OBR) (Economic and Fiscal Outlook – March 2025) projects a gradual economic recovery, with real GDP growth expected to rise from near zero in 2023 to 1% in 2025 and 1.9% in 2026. It is expected to stabilise at an average potential growth rate of 1.75% through 27/28/29, however, uncertainty remains high due to UK labour force, GDP and productivity data as well as global geopolitical disruptions on trade policy.
67. Inflation, measured by the consumer price index CPI, is forecast to increase from 2.5% in 2024 to 3.2% in 2025, peaking at 3.8% in July 2025, driven by energy price caps, food prices, and utility bills. From mid-2026 inflation is expected to return to the Bank of England's 2% target as these pressures ease.
68. Experian Business Strategies (Experian) predict in their latest Retail Planner Briefing Note 22 (March 2025) ('**RPBN 22**') a slightly stronger GDP outlook for 2025, bolstered by early-stage government spending and a modest rebound in retail sales, particularly in discretionary consumer categories, as real incomes begin to recover.

RETAIL SPENDING

69. The latest Experian forecasts from RPBN 22 for retail spending per capita show:
- **Convenience goods:** The impact of COVID-19 resulted in a significant +6.8% surge in spend per head in 2020 but a contraction of -1.3% in 2021. This followed negative growth of -2.3% between 1998 and 2023. The overall level of negative growth in convenience goods spending has had a significant

impact on the grocery sector and on retailer business models. Experian reported a fall in convenience spend in 2023 (-3.5%); 2024 (-1.8%); and 2025 (-0.8%). With no growth projected over the medium term to 2030 and beyond over the longer term to 2040.

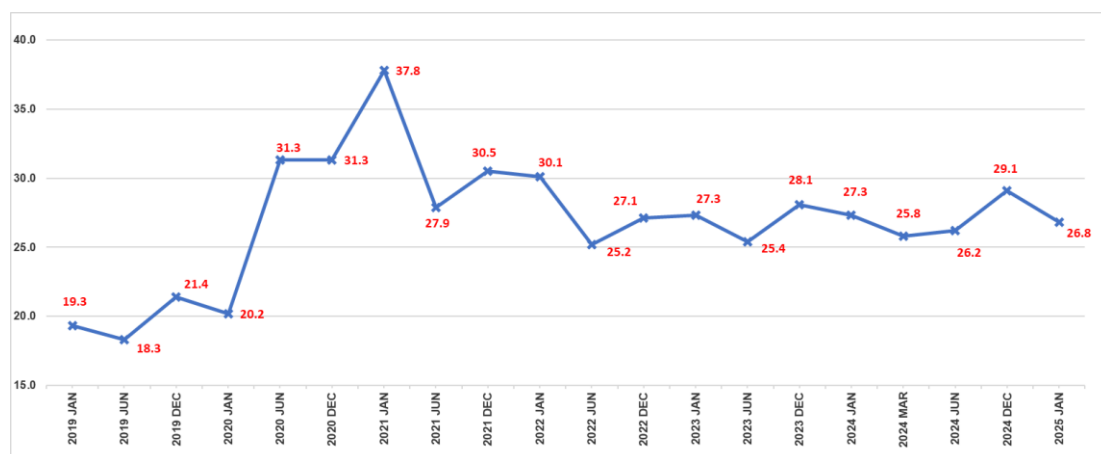
- **Comparison goods:** Experian figures show negative growth up to 2024 (-3.2% in 2023; -1% in 2024). The predicted (per capita) growth for 2025 is a nominal 0.1%, 1.3% in 2026 which will settle at around +2.5% to 2031 and to +2.6% up to 2040. The longer-term growth forecast is higher than the historic long-term trend (1998-2023) of +1.5% per annum.

70. These expenditure growth trends, and forecasts, have informed the updated assessments of retail capacity. Clearly any further dampening of growth rates over the short to medium term due to external shocks such as rising inflation and the cost-of-living crisis will have implications for the viability of existing retail businesses and the demand for new space.

ONLINE SHOPPING

71. The growth in non-store retail sales has undoubtedly had the most significant impact on consumer spend and behaviour over the last decade, and on our High Streets and traditional shops. Non-store retailing is commonly referred to as Special Forms of Trading (SFT).
72. This comprises all non-store retail sales made via the internet, mail order, stalls and markets, door-to-door and telephone sales. On-line sales by supermarkets, department stores and catalogue companies are also included in the data collected by the Office for National Statistics (ONS).
73. ONS figures show that as a percentage of total sales, online retail sales accounted for up to 26.8% of sales in January 2025. The graph also shows the steep increase from 20.2% in January 2020 to 37.8% in January 2021. Overall, the trend suggests that since 2020 online accounts for between a quarter to a third of the amount spent on retail goods. This compares to less than 5% in 2008.

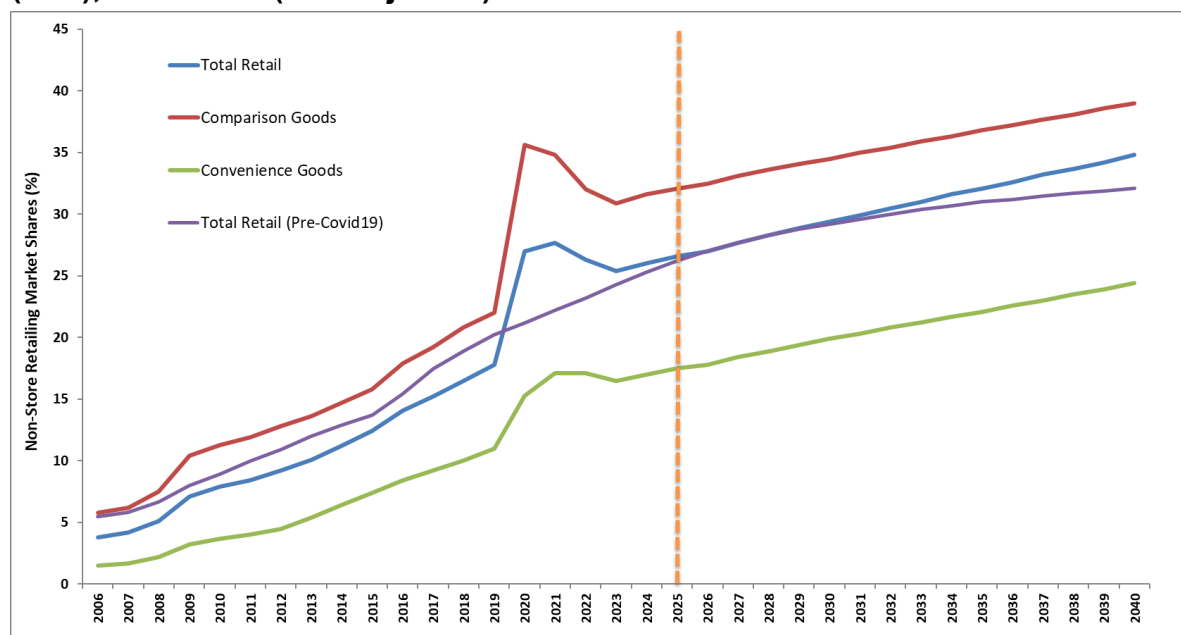
Figure 2: Internet Sales as a Percentage of Total Sales (%) (to September 2024)



Source: ONS: Retail sales, Great Britain: November 2024

74. As the figure below from Experian shows, SFT's overall market share (as a proportion of total UK retail sales) increased from 3.8% in 2006 to 27% in 2020. In other words, online accounted for almost one in every three pounds spent on retail goods in 2020. Of this total non-store retail sales, Experian estimate that comparison and convenience goods retailing achieved market shares of 35.6% and 15.3% respectively in 2020. They further estimate that comparison and convenience goods retailing will attain market shares of 32.1% and 17.5% respectively in 2025.

Figure 3: Estimated and Projected Market Shares of Non-Store Retail Sales (SFT), 2006-2040 (Not Adjusted)



Source: Experian Retail Planner Briefing Note 22 (March 2025)

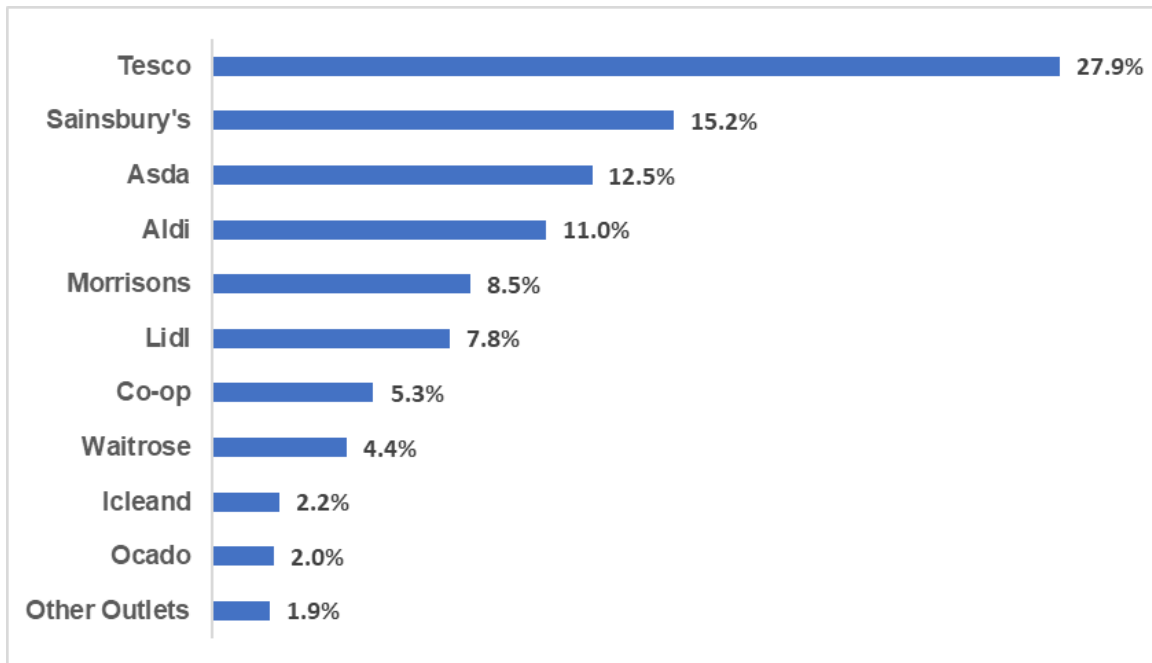
75. The latest Experian forecasts indicate that total SFT market shares will increase to 34.8% by 2040. Comparison and convenience goods non-store retail sales are forecast to reach 39% and 24.4% respectively by 2040.
76. According to Experian, the rising share of internet sales in total retail transactions is the key trend. The ease of online purchasing has also continued to improve rapidly, with technological advances, particularly around smartphones and connectivity. Faster delivery times, including same day delivery, and easier returns processes have also encouraged the trend. The expansion of 5G and fibre networks should ensure the momentum is maintained over the medium term. The proliferation of the buy now pay later business model and price tracker sites is also supporting growth.
77. With the growth predicted in online sales and market shares, it is clear that high streets, town centres and physical retailers will need to work even harder to retain their existing customer base and attract new customers over the short, medium and long term.

78. In terms of forecasting the potential capacity for new physical retail floorspace, Experian estimate that approximately 25% of all SFT sales for comparison goods and 70% for convenience goods are still sourced through traditional ('bricks-and-mortar') retail space, rather than through 'virtual' stores and/or 'dot com' distribution warehouses. On this basis, Experian adjust their SFT market shares downwards for total retail to 16.9% in 2025, 18.9% by 2030 and 22.9% by 2040. In line with standard approaches these adjusted / recalibrated market share figures are preferred for retail capacity assessments and used in this assessment.
79. In summary, both retailers and high streets will need to compete for shoppers and expenditure through a variety of means including creating experiences that will attract the interest and attention of potential consumers across all age and socio-economic groupings.

RETAILER BUSINESS MODELS AND REQUIREMENTS

80. The recent challenging economic conditions and growth in online sales have had a significant and permanent impact on consumer shopping and spending behaviour. Retailers in the recent past have faced challenges across the supply chain, inflationary pricing, economic uncertainty and geo-political factors.
81. Retail is undergoing a major transformation as the new normal drives hybrid, technology enabled and sustainability focused consumer expectations. Key trends shaping the future include:
- **Hybrid 'phygital' shopping** through seamless integration across online, in-store, mobile, social and virtual platforms is now essential.
 - **AI driven personalisation** as increasingly retailers are using AI for smarter chat bots, personalised recommendations and data-driven promotions to enhance customer engagement.
 - **Social commerce** where social media is not just for marketing. Brands now sell directly through platforms leveraging influencer partnerships and sentiment analysis to drive sales conversions.
 - **Monetising retail spaces** where physical stores and websites are doubling as advertising channels and with services such as 'Click-and-collect' and 'Buy Online, Pick Up In Store' (BOPIS) improving consumer convenience.
 - **Sustainability and the circular economy** as eco-conscious consumers are embracing reuse, repair and recycling prompting retailers to prioritise green packaging, ethical sourcing and transparency.
82. The grocery market illustrates the shift vividly. While traditional giants like Tesco and Sainsbury's focus on online and convenience formats, deep discounters ALDI and Lidl have surged. ALDI now ranks among the top four UK grocers overtaking Morrisons. Large store developments have all but halted highlighting a seismic industry pivot towards agility, access and sustainability.

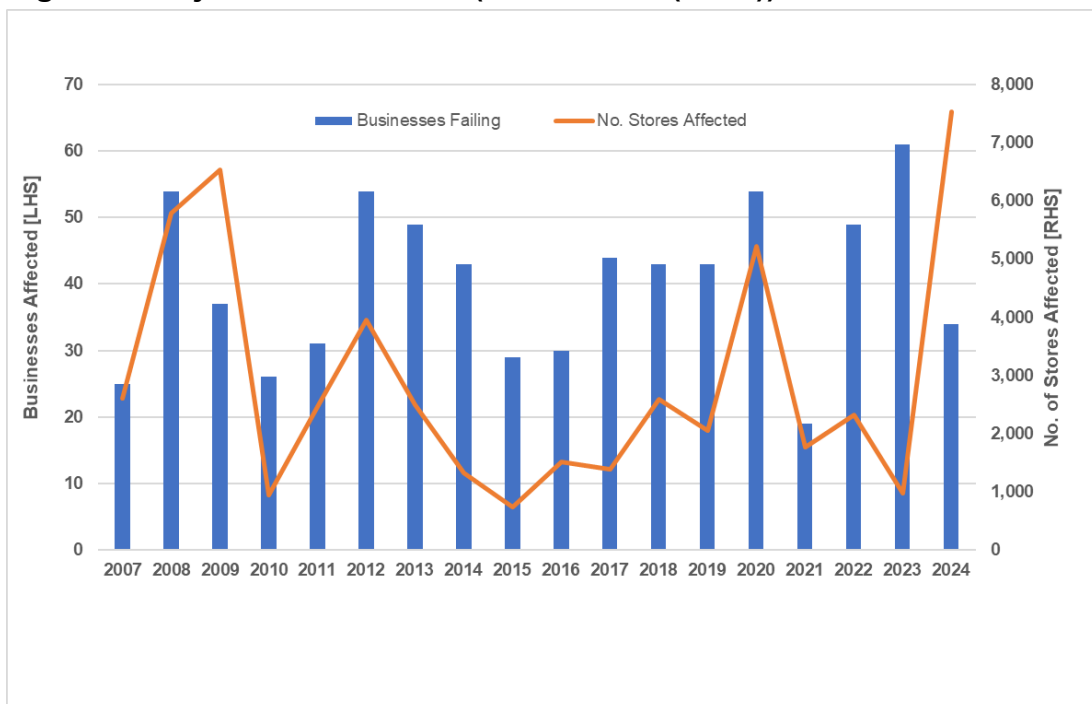
Figure 4: UK Grocery Market Share



Source: Kantar (April 2025)

83. The non-food retail sector is under intense pressure as well due to the rise of online shopping, post COVID financial constraints and soaring operational costs continued to reshape the high stream. Store closure numbers are peaking with 5,200 store closures in 2020 and 7,537 in 2024 with almost 55,900 job losses with major chains like The Body Shop and WHSmith among the casualties.

Figure 5: Major Retail Failures (2007 – 2024 (June))



Source: Centre for Retail Research (April 2025)

84. Retailers are grappling with reduced business rates relief down from 75% to 40% and an uneven playing field, where High Street trading is costlier than online or out of town alternatives. Traditional retail models are struggling to adapt fast enough to shifting consumer behaviours and digital demand.
85. While larger retailers face mounting difficulties, technology adoption offers a lifeline especially for agile small and medium enterprises who are leveraging digital tools to expand region track consumer trends. Still, challenges like digital skills gaps and technology affordability limit this potential, reinforcing the urgent need for transformation across the sector.

ISING OCCUPANCY COSTS

86. High street retailers are under growing strain as occupancy costs such as rents, rates, utilities and wages rise faster than inflation and outpace sales growth. This squeezes margins and accelerates store closures. The competitive imbalance between bricks and mortar stores and online or Out of Centre retailers makes survival even tougher. To stay viable, retailers must maximise efficiency and productivity from existing space.
87. The latest Retail Planner Briefing Note (RPBN 22) (March 2025) provides forecasts of annual floorspace productivity growth rates based on two different scenarios: (i) the 'constant floorspace scenario', based on limited potential for new retail development, resulting in greater efficiency of existing floorspace; and (ii) the 'changing floorspace scenario', which takes account of the impact of new retail development on average retailer sales performance. The table below sets out the differences between the two scenarios.

Table 1: Floorspace Productivity Growth Rates (year-on-year growth %)

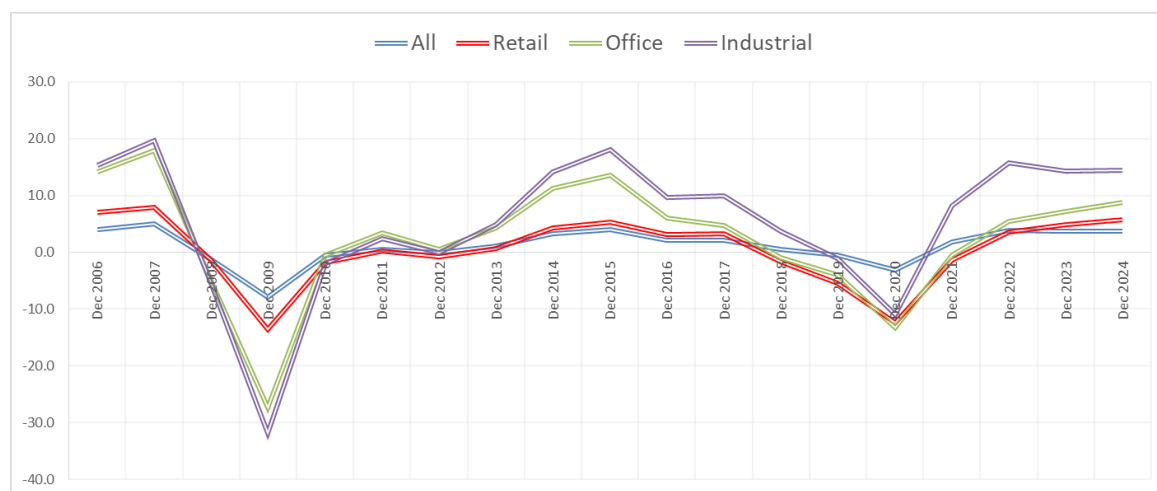
	2023	2024	2025	2026	2027-2031	2032-2040
CONSTANT FLOORSPACE						
Convenience Goods	-2.4%	-2.3%	0.0%	0.1%	0.1%	0.1%
Comparison Goods	-0.5%	-0.1%	0.5%	1.7%	2.5%	2.5%
CHANGING FLOORSPACE						
Convenience Goods	-2.4%	-2.3%	-0.1%	0.0%	0.0%	-0.1%
Comparison Goods	-0.5%	-0.2%	0.4%	1.6%	2.3%	2.3%

Source: Experian Retail Planner Briefing Note 22 (March 2025); Figures 3a/3b and 4a/4b

88. As Experian explain, sales density growth rates have been volatile in recent years given sharp swings in retail spending due to temporary closures in businesses during the pandemic, and subsequently the impact of high inflation. There is anticipated growth in sales density in 2025 as retail sales volumes rebound, driven by the comparison component, aided by mildly improving consumer affordability. However over the medium and longer term, budgetary challenges from rising costs and tight margins will be a key factor underpinning floor space efficiencies over the coming years. These results reflect national trends and there will be marked differences between local areas.

89. On this basis, budgetary pressures mean that retailers will have to increase efficiencies from current floorspace including through redevelopment/repurposing of existing floorspace; adoption of modern technology and innovations; more effective marketing strategies; and adopting an ‘omni-channel’ strategy (refers to the integration of different methods of shopping available to consumers e.g. via the internet, in a physical shop, or by phone) that uses internet sales to increase the sales performance of physical shops. This is against a backdrop of weak demand for retail property, high vacancy levels and a significant fall in new retail-led development in centres across the UK.
90. For these reasons we prefer to test higher **‘constant floorspace productivity’** growth rates for retail planning assessments, as they better reflect national trends and the need for existing retailers to increase their sales potential and profit margins to remain viable.
91. Retail demand across UK centres has plummeted to historic lows dragging down rents, property values and investor confidence. Since the 2007/8 financial crisis further exacerbated more recently by the pandemic and cost of living crisis, the retail sector has consistently underperformed compared to other property sectors as shown below.

Figure 6: Property: Average Rental Growth (2006-2024) (%)



Source: MSCI UK Quarterly Property Index (April 2025)

92. Retailers are leveraging this downturn to secure more favourable lease terms, including turnover based rents, capped service charges, shorter leases, pandemic clauses and generous incentives. Many UK retail centres suffer from an oversupply of outdated or the ‘wrong type’ of spaces unable to meet modern retailer demands for larger flexible units.
93. LSH’s research together with REVO titled **‘Shaping Tomorrow’s Places’** (June 2025) provides a barometer of the main issues and challenges facing our centres, and the opportunities and potential interventions available (&/or needed) to support their future recovery, reinvention and renaissance

94. This research indicated that business rates have consistently been identified as one of the main challenges impacting on the viability of our centres alongside an oversupply of retail space and the growth of online retail spend.
95. This over-supply of retail floorspace and limited market demand is placing further pressures on the viability of existing stores and shopping centres. In turn, this makes it difficult for landlords, investors and retailers to justify additional capital expenditure.

OUT-OF-CENTRE RETAILING

96. Out of Centre retail development has slowed, mirroring the challenges facing town centres. Major grocery chains have shifted focus from large format stores to online and convenience formats. The exception is the discounters like ALDI and Lidl who remain active in seeking new edge and out-of-centre sites.
97. Despite the slowdown, Out of Centre locations still offer key advantages namely lower occupancy costs, larger modern units, ample free parking and last mile delivery potential. These trends continue to attract retailers adapting to evolving consumer behaviours. For example, Marks and Spencer has pivoted from high streets to open more food-only stores in out-of-centre locations.
98. According to the investment property forum (May 2025), modest rental growth is expected in 2025; 1.5% for shopping centres, 2.3% for retail warehouses and 2.5% for standard retail indicating cautious optimism in a still-rebalancing market.

VACANCY RATES

99. At the end of 2024, the GB national average 'All Vacancy Rate' (retail and leisure combined) stood at 13.8% (a decrease from 14% in 2023). The current rate is still higher than the pre-pandemic (Q4 2019) level of 12.1%, so the sector has yet to fully recover.
100. Over the past five years, retail parks and shopping centres have shown an overall decline in vacancy rates, while high streets have experienced an increase. From a vacancy high of 19.4% in the second quarter of 2021, shopping centres dropped to 17.2% by the final quarter of 2024.
101. The LSH/Revo survey has consistently identified there is too much retail floorspace in the UK. As a result, centres and locations are competing to attract limited occupier interest. There is also competition to secure public and private sector investment to help deliver critical redevelopment and regeneration projects.

STREET AND COVERED MARKETS

102. Another form of SFT are street markets which can play a significant role in the success of town centres.
103. The Mission4Markets project was launched by the National Association of British Market Authorities and the National Market Traders Federation to collect data, publish recommendations, and advocate for the markets sector. According to Mission4markets there are 1,173 markets in the UK, which includes traditional and

specialist markets. 32,400 businesses trade on these markets and in 2017-18, had a collective turnover of over £3.1 billion - an increase of £200 million year on year since 2012.

104. The organisation also found that:
 - 82% of markets are run by local authorities, 10% by private companies and the remainder are made up of trader cooperatives, social enterprises, and community interest companies;
 - 81% of businesses in the sector are not registered for VAT and 77% are sole traders; and
 - 48% are led by women (UK Government, 2017) compared with 21% of SMEs in the UK.
105. Much of the available research on markets is London focussed but the data is useful in understanding the value of markets. For example, data on markets in the capital show increasing demand for markets and support 25% of footfall in centres where markets operate and account for 1.3% of the GVA for London's retail sector. This is likely to be the case for popular markets in most centres across the UK including Greenwich West, Eltham, Blackheath, and where outdoor markets operate. Fixed markets such as Greenwich Village Market is likely to have an even greater GVA value through year-round and all-weather trade.
106. Generally, markets are recognised as providing affordable and flexible accommodation for businesses. As such, they provide a unique opportunity to trade, test business ideas, or showcase new products. On a per square foot basis markets provide more jobs than supermarkets.
107. Indoor and street markets have also provided the basis for new businesses to become established for a considerable period. The first M&S famously opened in Newcastle's Grainger Market in 1895, having started out as a market stall at Kirkgate Market in Leeds in 1884, for example. However, there has recently been a new emphasis on empowering younger people to start out in businesses as market traders.
108. One initiative, Teenage Markets, was created to give young people a free platform to showcase their creative talents. There is now a fast-growing network of traders and performers taking part in Teenage Market events across the UK. In October 2023, there were 56 UK locations being used for Teenage Markets, with venues including market halls, street markets and events.
109. The Teenage Market website summarises the benefits to young people and the wider community, noting "When combined, the creative fusion of specialist retail and live performance creates a thriving and bustling marketplace which succeeds in attracting a new generation of shoppers and visitors to our nation's local markets." The High Street Task Force is actively supporting Teenage Markets.
110. Markets can therefore play an important part in supporting the local economy and community and assist small businesses, including those led by women, young people, and minority groups.

USE CLASSES ORDER AND PERMITTED DEVELOPMENT RIGHTS

111. The Government has issued a series of reforms to the planning system since 2020. Effectively, changes to the use classes were brought in to provide a more flexible approach to controlling commercial land uses. This saw the replacement of Use Class A1 to A5, D1 and D2 with E Class (Commercial), F1 (Learning and Non-Residential) and F2 (Local Community Uses) and the restructuring of sui generis uses (public houses, hot food takeaways, cinemas, music venues, bingo etc.).
112. The result of these changes is that what would previously be a change of use under the subsumed use classes is no longer considered development under the Planning Acts and accordingly is no longer subject to planning control. In launching the reforms, the Government announced that the regulations will give "...greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings" (source: Prime Minister's Office Press Release (30/06/2020) "Build, Build, Build").
113. The impact of the changes will still require the definition of a town centre boundary and a primary shopping area, or a primary 'commercial' area to be the foci for E and F Classes. Also, in most instances the former use classes can be 'translated' into the equivalent categories within the new E and F Classes. This can assist with the interpretation of policy wording and the effective use of conditions. It is worth noting that under the previous use-class system such categories as convenience, comparison (and bulky) goods fell within the A1 use-class and there is a long-established planning pedigree of reflecting these A1 retail categories effectively in planning conditions.
114. The changes have implications for primary and secondary shopping frontages, as the control of shopping and service uses is legally less enforceable in commercial areas, as a change of use between Class E does not constitute development and will therefore not require planning permission. It should be noted that the effectiveness of frontage policies was declining before the pandemic and previous changes to the UCO. However, there may still be a role to control some sui generis uses in key town centre locations, such as provision of fast-food takeaways, betting shops, payday loan shops or other uses that are justified to be subject to planning control.
115. Hence beyond 2024, town centres are likely to consolidate their retail and shopping role with more emphasis on place and non-transaction uses, this could include high activity-based land uses such as health or education being located in more central locations and stem previous trends of decentralisation.
116. The increase in city living and residential development in town centres is likely to be a growth area in the next 10 years and could be a positive regenerative mandate. We also expect more emphasis on residential upper floor living accompanying ground floor commercial uses. For example, vacant space can be repurposed to rebalance the existing mix of uses, with a greater emphasis on

residential, office and leisure. Delivering more homes in central locations is a key objective for most London authorities, including Royal Greenwich with emerging Regeneration Frameworks for Woolwich, Plumstead, and Thamesmead are exploring opportunities to deliver large scale housing as part of town centre regeneration.

117. The introduction of Class AA and AB in August 2020 (under the Permitted Development Changes (Amendment No. 2) (2020)), allowing new residential on detached or terrace buildings in commercial or mixed-use areas could potentially lead to the loss of commercial floorspace to residential.
118. Furthermore, the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 (Order) that came into force in April 2021 created a new class of permitted development right (Class MA) into the Town and Country Planning (General Permitted Development) Order 2015 (GPDO) authorising changes of use from Use Class E commercial uses to Use Class (C3) residential. The changes within the Order authorise a change in the permitted use of a property or land from a use falling with Use Class E to Use Class C3 residential use where the property has:
 - been in Class E use for 2 years (including time in former uses i.e. A1, A2, A3, B1, D1 or D2 now within that Class); and
 - has been vacant for at least 3 continuous months.
119. These changes replace existing retail, light industrial and office to residential rights with rights applying to all the relatively recent Use Class E in which those uses now sit. Exercise of the right is subject to prior approval by the local planning authority and therefore would be subject to some planning control. Details must be submitted relating to flooding, transport, contamination, noise amenity, natural light, fire safety and agent of change issues. The area that can be converted is capped, with a maximum size limit of 1,500 sqm of floorspace capable of conversion using the right.

LEISURE TRENDS

120. The most recent leisure spend projections by Experian Business Strategies (EBS) as set out in the Retail Planner Briefing Note 22 (March 2025) shows that following a dramatic -36.3% fall in leisure spend per head in 2020 due to the pandemic, there was an upsurge in 2021 of 29.5% that continued until 2022 (of some 20.9%) followed by a reduction in 2023 (-2.6%) due the cost of living crisis and rising inflation. Experian's latest data (which is based on estimates up to 2023 and forecasts from 2024 onwards) predict a continued reduction in 2024 (-1.6%) followed nil growth in 2025. From 2026 onwards, annual growth will be minimal (0.3%).

Table 2: Leisure Spend and Projections (year-on-year growth %)

	2019	2020	2021	2022	2023	2024	2025	2026-40
Annual Leisure expenditure growth	-0.1%	-36.3%	29.5%	20.9%	-2.9%	-1.6%	0.0%	0.3%

Source: Retail Planner Briefing Note 22 (March 2025)

121. Spending on leisure is linked to consumer confidence and the wider economy. In recent times, higher mortgage rates, the rate of inflation and the broader cost of living crisis has impacted the sector. This is illustrated with a review of the following selective commercial leisure categories:
- **Cinemas:** The sector is going through change as consumers become more price conscious and as a result are more selective in their frequency. The cinema sector remains under pressure, with operators such as Cineworld and Empire having filed for administration in 2023.
 - **Food & Beverage (F&B)** sector has faced a number of challenges from Brexit, the pandemic and the cost of living crisis and rising inflation has meant that the sector has been under strain for a while. A transition from 'eating out' to 'eating in' has become the norm as consumers are forced to cut back on spending. Currently online food delivery companies are competing for consumer spend as consumers choose to stay at home but continue to treat themselves despite potential economic cutbacks. Operators within the leisure sector, and most notably pubs, have seen sharp rises in expenditure, with the heightened costs of energy, staffing and goods exerting pressure on operators. Growth in eating out is predicted as consumer wages and confidence grow.
 - **Coffee shops** seem to remain an essential for consumers. The coffee shop spend trend closely links to retail trends, where visitors to the high street and shopping centres see the coffee shop break as integral to the shopping experience. However, the price of coffee has pushed up prices, so whilst demand volume is stable, revenue growth is largely driven by price increases that are required to absorb rising supply and operating costs..
 - **Competitive socialising:** Despite the inevitable impact on consumer finances, former retail spaces are being repurposed into leisure venues that are having an impact on the vitality of town centres. Competitive socialising is a key trend driving this change. Leisure activities range from escape rooms, axe throwing to immersive group virtual reality (VR) experiences. This is being driven by younger demographic seeking new and diverse forms of entertainment and a desire for real social connection together, with the availability of previously retail-dominated space.
 - **Night Time Economy:** According to recently published analysis from the Night Time Industries Association (June 2024), the UK night-time economy was worth £33.3 billion in 2022, down from £37.2 billion in 2019. From its declining music scene to the loss of significant numbers of clubs and pubs, the

UK's night time economy is under strain. The government's Interdepartmental Business Register (IDBR) indicates that the number of pubs and bars declined by 10% in the decade to 2022, while the number of licensed clubs fell by 28%, amounting to a total loss of around 7,000 establishments over ten years. In the same period, however, the number of licensed restaurants in the UK has increased by 30%. The decline in the night-time economy is attributed to squeezed consumer finances detailed previously as well as changing consumer preferences including the decline in drinking particularly among younger demographics. UK Government has announced a pilot scheme in London to allow pubs, clubs, and restaurants to stay open later and changes to licensing to boost growth.

- **Health & Fitness (H&F):** According to the State of the UK Fitness Industry Report 2023 the UK had slightly fewer gyms (0.9 per cent) in 2023 than in 2022 but member numbers were up by 3.9%. The increases in member numbers were greater in the private sector than in the public sector, with budget chains, PureGym and The Gym Group, the two leading operators in terms of new gym openings. The increasing emphasis on wellbeing, good health and preventative healthcare remain a positive sign of the sector's longer term resilience.

SUMMARY

122. Our towns, traditional high streets and shopping centres have been challenged for more than a decade by falling market demand, rising occupancy costs, and increasing competition from online and out-of-centre shopping. Trends accelerated and compounded by the COVID-19 pandemic are resulting in an increase in vacant shop units, often in primary shopping areas, as retailers and occupiers either choose to downsize and/or close stores in some locations (or they are forced out of business altogether due to failing business models and unmanageable debts). As online spending has increased, the demand for physical retail has been impacted and where there is vacant space there is a need for a strategic evaluation as to how town centres realign themselves.
123. Today, many of our traditional towns and shopping centres simply have too much retail space and Royal Greenwich's will not be immune from the structural changes occurring within the retail and leisure sectors. The critical challenge over the short, medium, and long term will be how to retain existing businesses, fill/replace the voids and attract new investment. The danger is that an increase in long-term vacancies in centres will lead to a 'spiral of decline,' which will further engender feelings of neglect and lack of investment confidence in town centres, and "push" more people to shop online.
124. As town centres evolve, residential provision in centres is already being encouraged and considerable residential development has already been promoted and achieved within through site allocations. Major residential development along Woolwich Riverside being a good example within Royal Greenwich and the ongoing regeneration of this area has the potential to transform Woolwich Town

Centre through new residential spending and capitalising on the centre's Crossrail links.

125. Residential development is also encouraged by previous national planning changes (such as office to residential conversions through prior approval and permitted development for two flats above a shop). In those cases where retail vacancies are long-term and more often than not concentrated in secondary shopping streets/pitches, it will be necessary to plan for alternative uses and/or consider options for redevelopment. As a result of the increasing drive towards more flexible planning through changes to the UCO and PDR, there will inevitably be more mixed-uses within centres particularly residential, and this should be encouraged and planned for through enabling planning policies.

4. TOWN CENTRE HEALTH CHECKS

126. Planning policy at all levels seeks to maintain and enhance the vitality and viability of town centres and therefore understanding the current health of a centre is an important element of any evidence-based Retail Study.
127. Health check assessments for Royal Greenwich's two major town centres and seven district town centres are provided in **Volume B** of this study. The assessments provide a qualitative overview of the current vitality and viability of the centres informed by information on some of the KPIs set out in the PPG. Details of the KPIs, other information used to inform our assessments and data sources used are detailed in the report (Volume B) and the key findings in terms of our overall conclusions and the strengths, weaknesses, opportunities and threats for each of the centres is set out below.

ELTHAM MAJOR CENTRE

128. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Eltham Major Centre can be summarised as follows:

Table 3: Eltham Major Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> Investment into high street and public realm improvements Cinema as a key entertainment and leisure venue Low vacancy rate (particularly floorspace) Strong comparison retail offer (floorspace coverage) Good representation of national multiples Footfall growth seen across the centre in recent years Good public transport links 	<ul style="list-style-type: none"> Weaker food & beverage offer when compared to London averages Retail rental values declining since 2008 and Eltham significantly underperforming when benchmarked against comparable centres
Opportunities	Threats
<ul style="list-style-type: none"> Development opportunity at Orangery Lane to bring new retail & leisure units, a hotel and public realm improvements Capitalise on the retailers who are interested in gaining representation within the centre 	<ul style="list-style-type: none"> High/ increasing business operating costs Further loss of physical presence of national multiples following difficulties for the likes of WHSmith, Wilko and Body Shop The growth in online shopping and its impact on brick-and-mortar retail outlets

129. We conclude that overall Eltham Major Centre is a vital and viable centre that is generally performing well as a retail and leisure hub for the Borough. Its leisure offer in particular has been boosted in recent years with the arrival of Vue cinema and associated food and beverage units. Vacancy rates are low, and footfall has grown in recent years, indicating that it has weathered the Pandemic storm relatively well. Whilst there is a strong presence of national multiples in the centre, as to be expected for a centre of its size, the struggles that many major high street brands have faced in recent years poses a threat to Eltham going forward. However, opportunities such as the development at the Orangery Lane site provide a chance for Eltham to continue to develop and evolve, making it even more resilient to external pressures.

WOOLWICH MAJOR CENTRE

130. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Woolwich Major Centre can be summarised as follows:

Table 4: Woolwich Major Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> Investment into public realm improvements Low rate of vacant floorspace Good food & beverage offer Good presence of national multiples Footfall growth across multiple parts of the centre Strong public transport links Good examples of signage and supportive wayfinding 	<ul style="list-style-type: none"> Vacancy rate of units is above the London average, although vacant floorspace is below average, which may reflect an oversupply of smaller units that are not fit for purpose. Clusters of vacant units creating areas of neglect and low activity within the centre Closure of WHSmith and the impact on the Post Office service Declining retail rental values in recent years
Opportunities	Threats
<ul style="list-style-type: none"> Ongoing residential developments and future potential opportunities for more will boost population and subsequently catchment spend Diversify the uses in the centre to support bringing vacant units back into use (e.g., education and health care uses) Capitalise on the retailers who are interested in gaining representation within the centre Build on the successes of the Woolwich Lates scheme to boost the centre's image as an evening destination 	<ul style="list-style-type: none"> Competition from nearby retail parks (Greenwich Shopping Park and Brocklebank Retail Park) that offer more convenient access for those visiting by car High/ increasing business operating costs Further loss of physical presence of national multiples following difficulties for the likes of WHSmith, Wilko and Body Shop The growth in online shopping and its impact on brick-and-mortar retail outlets

131. We conclude that overall, Woolwich Major Centre is a vital and viable centre that is generally performing well – serving its immediate catchment whilst also drawing visitors from beyond, in part due to its substantial retail and leisure offer. The arrival of the Elizabeth Line in 2022 has significantly boosted the centre’s linkages to the rest of London, with growth in footfall figures seen in recent years. Ongoing investment into the public realm are expected to make significant improvements to the centre’s environmental quality and will hopefully increase visitor numbers further as well as boost dwell times. Residential-led developments will see the centre’s catchment population rise, and with it, the available expenditure within the area. Further opportunities such as Woolwich Exchange have the potential to strengthen the centre again, with additional population, further diversification of uses as well as improvements to the public realm. Furthermore, opportunities to promote the centre’s nighttime economy should be explored on the back of the Woolwich Late’s initiative.

BLACKHEATH DISTRICT CENTRE

132. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Blackheath District Centre can be summarised as follows:

Table 5: Blackheath District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Low vacancy rate (outlets), although this masks a high rate of vacant floorspace. • Good mix of national multiples and independents operators • Weekly market as a driver of footfall in the centre • Strong interest from a range of retailers for presence within the centre • Good public transport links • Strong environmental quality • Access to open green space 	<ul style="list-style-type: none"> • Vacant floorspace rate is above the London average, albeit this is partly within London Borough of Lewisham. • Footfall is down when comparing pre-Pandemic to post-Pandemic • Challenging environment for cyclists in parts
Opportunities	Threats
<ul style="list-style-type: none"> • Capitalise on the retailers who are interested in gaining representation within the centre • Diversify the uses in the centre to support bringing vacant units back into use (e.g., education and health care uses) 	<ul style="list-style-type: none"> • High/ increasing business operating costs

133. We conclude that Blackheath District Centre is currently performing well as a District Centre, providing local residents with a good mix of day-to-day uses, whilst having the ability to draw visitors from further afield due to its high environmental

quality and strong independent offer. However, the proportion of vacant floorspace is above the London average, and footfall levels have not fully recovered from pre-Pandemic levels. There are therefore improvements that need to be made to secure the long-term success of the centre, potentially through the introduction of new uses into the centre, the delivery of development opportunities or by working to accommodate retailers that have interest in gaining presence in Blackheath.

EAST GREENWICH DISTRICT CENTRE

134. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for East Greenwich District City Centre can be summarised as follows:

Table 6: East Greenwich District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> Strong presence of independent representation Increase in footfall over the past few years Strong leisure and service offer Provision of cycle lanes and cycle storage 	<ul style="list-style-type: none"> Vacancy rate above London averages (outlets and floorspace) Weak environmental quality in some areas Traffic throughout the centre creating challenges for pedestrians navigating the centre
Opportunities	Threats
<ul style="list-style-type: none"> Diversify the uses in the centre to support bringing vacant units back into use (e.g., education and residential uses) Improvements to environmental quality where appropriate – shop frontages, building quality and litter 	<ul style="list-style-type: none"> High/ increasing business operating costs Competition from nearby retail centres (Greenwich West) that offer a larger mix of retail and leisure provision

135. We conclude that East Greenwich District Centre is currently performing adequately as a District Centre, albeit more biased towards serving the day-to-day needs of its local residents (particularly through leisure and service uses) compared to other district centres in the Borough. Whilst footfall has grown in recent years, vacancy rates are above London averages, posing a challenge to the centre. In light of this, and given the high/ increasing business operating costs, coupled with the competition from nearby centres, East Greenwich will need to look to diversify its uses in an effort to reduce vacancy rates and increase its resilience going forward.

GREENWICH WEST DISTRICT CENTRE

136. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Greenwich West District Centre (also referred to as Greenwich District Centre) can be summarised as follows:

Table 7: Greenwich West District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Strong public transport links • Low vacancy rate • Market as key attraction destination and footfall driver • Good blend of national multiples and independent operators • Strong food and beverage outlets – 29.4% compared to London average of 24.0% • Strong leisure outlets – 35.5% compared to London average of 26.4% • Good environment quality – good access to green space, historical buildings and street furniture • Strong mix of cafes, pubs and other leisure appealing to locals and tourists • Good evening offer (cinema, theatre, comedy clubs and more), which is leading to strong footfall activity 	<ul style="list-style-type: none"> • Footfall has not reached pre-Pandemic levels • Lack of comparison retail (particularly floorspace coverage)
Opportunities	Threats
<ul style="list-style-type: none"> • Increase comparison retail provision to increase dwell times within the centre • Cutty Sark shopping centre environmental quality could be increased • Capitalise on retailers who are interested in gaining representation within the centre 	<ul style="list-style-type: none"> • High/ increasing business operating costs • Further loss of physical presence of national multiples following difficulties for the likes of WHSmith, Wilko and Body Shop • The growth in online shopping and its impact on brick-and-mortar retail outlets

137. We conclude that Greenwich West District Centre is currently a successful centre that serves its immediate catchment with day-to-day retail, leisure and services, whilst also attracting and satisfying the needs of those who travel from beyond to visit attractions and destinations such as the market and nearby park. Vacancy rates are low, with leisure leading as the dominant use within the centre. Footfall has not managed to return to pre-Pandemic levels however, and so further work is needed to secure the success of the centre going forward. Whilst vacancy rates are low, there is significant interest from retailers in gaining presence within the area, and so efforts should be made to satisfy these requirements, thus strengthening the centre's offer going forward.

LEE GREEN DISTRICT CENTRE

138. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Lee Green District Centre can be summarised as follows:

Table 8: Lee Green District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Strong convenience retail offer – led by large Sainsbury's store • Growth in footfall recorded when comparing pre-Pandemic to post-Pandemic • Good bus routes and connections from the centre 	<ul style="list-style-type: none"> • High vacancy rate (largely due to preparation for demolition of Leegate shopping centre, albeit located in London Borough of Lewisham) • Limited food and beverage offer • Centre is dominated by traffic, making it challenging for pedestrians and cyclists to navigate in parts • The current nature of Leegate shopping centre (vacant and primed for demolition) is significantly detracting from the environmental quality of the centre
Opportunities	Threats
<p>The redevelopment of Leegate shopping centre and neighbouring sites has the potential to:</p> <ul style="list-style-type: none"> • Boost catchment population and expenditure • Supply new, high-quality retail and leisure units • Improve the mix of uses in the centre (medical centre proposed) • Improve the public realm offer • Boost Lee Green's image and draw, increasing the likelihood of visits from those beyond its immediate catchment • Support to regenerate the centre via the adopted Lee Neighbourhood Plan 	<ul style="list-style-type: none"> • High/ increasing business operating costs • High/ increasing infrastructure/ development costs pose a risk to the successful delivery of the Leegate shopping centre redevelopment

139. We conclude that Lee Green District Centre is a vital and viable one, that serves the day-to-day needs of its immediate catchment. Whilst vacancy rates are currently high, this is in the context of the imminent redevelopment of the Leegate shopping centre. This project poses a huge opportunity for the centre to boost its catchment population, strengthen its diversity of uses and improve the public realm within the centre. High/ increasing infrastructure/ development costs are however a threat to be mindful of as the delivery of the re-development progresses.

NORTH GREENWICH DISTRICT CENTRE

140. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for North Greenwich District Centre can be summarised as follows:

Table 9: North Greenwich District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Vacancy rate is below the London average – particularly vacant floorspace (0.7% in North Greenwich compared to London average of 9.6%) • High footfall throughout lunch, afternoon and evening • Strong provision of leisure and comparison retail uses • Very strong multiple representation • The O2 as a major entertainment venue generating high volumes of footfall • Regeneration projects (Design District) attracting businesses and increasing building use types • Good public transport links • Footfall is stabilising to pre-Pandemic levels • Good pedestrian accessibility due to limited presence of road networks 	<ul style="list-style-type: none"> • Lack of community feel, with majority of outlets being multiple representation • Lack of greenery and access to nature within the centre
Opportunities	Threats
<ul style="list-style-type: none"> • Residential development opportunities can boost catchment population and expenditure, and potentially provide green space within the centre as part of the developments • Build on the successes of having a strong entertainment offer, making the centre a hub of other activities • Opportunity to make more of Peninsula Square, with the potential for a softening of the environment through green space and vibrancy 	<ul style="list-style-type: none"> • High/ increasing business operating costs • Further loss of physical presence of national multiples following difficulties for the likes of WHSmith, Wilko and Body Shop • The growth in online shopping and its impact on brick-and-mortar retail outlets

142. We conclude that North Greenwich District Centre is currently performing well as a leisure and comparison retail destination, not just for the Borough, but for the broader City of London. The O2 acts a major entertainment attraction and footfall driver for the rest of the centre. The impact of the Pandemic did however highlight a potential over-reliance on these uses, and so ongoing opportunities for residential developments pose a chance for the centre to diversify slightly and improve its resilience.

PLUMSTEAD DISTRICT CENTRE

143. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Plumstead District Centre can be summarised as follows:

Table 10: Plumstead District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Good presence of independent representation • Good public transport accessibility • Low vacancy rate which boosts activity and environmental quality • Footfall has bounced back well from the Pandemic period 	<ul style="list-style-type: none"> • Low level of retail requirements • Weak anchor stores • Lack of parking • Challenging environment in parts for cyclists and pedestrians
Opportunities	Threats
<ul style="list-style-type: none"> • Increase pedestrian and cycling safety • Increase public space environmental quality 	<ul style="list-style-type: none"> • Competition from nearby retail centres that offer a larger mix of uses (Woolwich) • High/ increasing business operating costs

144. We conclude that Plumstead District Centre is vital and viable, serving the day-to-day needs of its immediate catchment. Footfall trends in recent years have shown the centre's resilience, even in the face of a Pandemic, whilst low vacancy rates suggest that it is a positive environment for businesses to operate in. Investment into the high street and train station further strengthen Plumstead's role within the Borough.

THAMESMEAD DISTRICT CENTRE

145. The Strengths, Weaknesses, Opportunities and Threats (SWOT) for Thamesmead District Centre can be summarised as follows:

Table 11: Thamesmead District Centre SWOT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Retail is led by national multiples, with good foodstore provision • Strong convenience offer (particularly relating to floorspace coverage) • Consistent footfall activity over recent years – limited Pandemic impact • Vast amounts of parking available 	<ul style="list-style-type: none"> • Low comparison and leisure units, below London average • Very high vacancy rates (outlets and floorspace) • Low public transport and cycle accessibility • Retail park format of the centre that does not offer the customer experience of a traditional high street • Lack of vibrancy and greenery
Opportunities	Threats
<ul style="list-style-type: none"> • Improve the mix/diversity of uses within the area (e.g., healthcare in the form of community diagnostics centres which are commonly being located within retail park units) • Increase environmental quality by softening the centre through greenery and vibrancy • Capitalise on the retailers who are interested in gaining representation within the centre • Major opportunities to regenerate the centre and deliver new homes and reconfigure the centre as part of the Opportunity Area designation • Leverage the proposed Bus Rapid Transit and DLR extension, which will connect the centre to more communities • Major opportunities to regenerate the centre and deliver new homes and reconfigure the centre as part of the Opportunity Area designation 	<ul style="list-style-type: none"> • High/increasing business operating costs • Lack of public transport accessibility, increasing attractiveness for better connected centres • High vacancy rate makes it likelier for shoppers to be drawn to alternative destinations with a stronger offer • Further loss of physical presence of national multiples following difficulties for the likes of WHSmith, Wilko and Body Shop • The growth in online shopping and its impact on brick-and-mortar retail outlets

146. We conclude that Thamesmead District Centre provides a unique offer when compared to the rest of the centres within the Borough. Its retail park format offers units that are suitable to national multiple comparison retailers, however, several of these units are currently vacant. As a result, vacancy rates (particularly vacant floorspace) are high. If these units remain vacant, then there is a risk that further

vacancies appear as a result of a weakened offer across the centre as a whole. An opportunity exists however for the diversification of uses within the centre, such as the introduction of healthcare (in the form of a community diagnostics centre for example). Fortunately, the dominant use within the centre is convenience, and as such, Morrisons and Aldi will continue to act as regular drivers of visits to the centre. The supporting offer however requires improvement in order to secure the long-term success of Thamesmead.

5. RETAIL AND LEISURE PROVISION AT CHARLTON RIVERSIDE

147. This section provides an overview of retail and leisure provision in Charlton Riverside and considers how this offer competes with the borough's existing centres, based on market share evidence identified in Section 2 of Volume B. The market share evidence for Charlton Riverside area is based on data obtained for the collection of retail parks in the area including Greenwich Peninsula, Greenwich Shopping Park, and nearby industrial estates and standalone stores.
148. The review also considers centres outside of Royal Greenwich that are easily accessible to borough residents and their potential impact on Greenwich's town centres. The purpose of the assessment is to consider whether policies are needed to manage / restrict new retail and leisure provision at out of centre locations in the Borough and to strengthen policies to mitigate against any potential impact that could arise from investment in competing centres (Section 7).

CHARLTON RIVERSIDE OPPORTUNITY AREA

149. Charlton Riverside is identified in the 2021 London Plan (Table 2.1) as an Opportunity Area (OA) with the potential for 8,000 new homes and 1,000 new jobs by 2042. The OA was designated in 2008 and is part of the Thames Estuary Growth Corridor.
150. According to the London Plan 2021, since 2019, a total of 216 homes have been delivered at Charlton Riverside, as such there is some way before the area meets its full potential as a new settlement. However, a number of schemes have been approved in the last 2 to 3 years (e.g. Herringham Quarter – 1,212 homes, and Flint Glass Wharf – 500 homes), which will deliver 142 homes which is a step forward in the realising the long term goal of this OA.
151. The Charlton Riverside Supplementary Planning Document (SPD) proposes a number of local centres and commercial hubs across the SPD area. While the SPD will be superseded by the new Local Plan the following review provides some context on how plans have evolved for the regeneration of the area.
152. The SPD disaggregates the masterplan area into six Development Opportunity (DO) areas (A-F). Under DO C, the SPD acknowledges that "the existing out-of-town retail activity does not conform with the Royal Borough's policy relating to promote Woolwich as a metropolitan town centre.. There is potential for some of the retail activity to remain, potentially embedded within new neighbourhood or local centres, but with a significant change to a mixed use form of development" (Section 4.3, SPD).
153. However, the proposed new Neighbourhood Centre would straddle the boundaries of DO C and B and along the southern stretch of Anchor and Hope Lane (Figure 4.6). Here the SPD describes this Neighbourhood Centre as providing "a mix of retail, food and drink, commercial leisure and community provision, as well as

some employment space, that provides for the day-to-day needs of residents, employees and visitors to Charlton Riverside.” (Section 4.4)

154. A further description of the neighbourhood centre is provided in the Character Area profile with the centre emulating a district character and the focus area “for most of the key commercial activities, including retail and leisure, which will serve the day-to-day needs of residents of Charlton Riverside and the communities close by.”
155. It is indicated that the High Street / centre would be delivered as part of Phase 1 (1C).
156. This study considers whether policy is needed to limit the potential for the shopping park to compete with and undermine investment within the borough’s existing centres, particularly Woolwich Town Centre. The recommendations are based on the following review of diversity of uses within the shopping park and the surrounding area and findings of the retail market share analysis in Volume B.

EXISTING RETAIL AND LEISURE OFFER

157. Existing retail and leisure offer is largely located across a cluster of retail parks and trading estates within the southwestern area of the masterplan area, including: Greenwich Shopping Park, Millennium Retail Park, Gallions Retail Park, Peninsular Retail Park, Stone Lake Retail Park, and smaller trading estates, and standalone stores.
158. The market share analysis confirms that Greenwich Shopping Park along with retail uses within the wider Charlton Riverside area draw the greatest proportion of retail spend from the borough area (broadly represented in geographic terms by Zone 1). As such, the transaction data confirms that these out of centre retail facilities are competing with the borough’s centres.
159. The figure below provides a snapshot of retail and leisure offer in and around Greenwich Shopping Park based on the latest Experian Goad survey (July 2024):

Figure 7: Diversity of Uses Map – Charlton Riverside



Source: Experian Goad

160. As can be seen in the figure above, the area is dominated by large format units that predominately exist within a range of retail parks (Brocklebank Retail Park, Greenwich Shopping Park, Peninsular Retail Park and Stone Lake Retail Park) and trading estate locations. Alongside the strong retail offer, a key appeal to customers will be the availability of free car parking, which is otherwise very limited in the borough's centres.
161. The table below shows that Charlton Riverside has a total of 112 units and an overall quantum of 150,330 sqm in floorspace (again, based on an Experian Goad survey from July 2024). This indicates an average unit size of 1,342 sqm.

Table 12: Diversity of Uses – Charlton Riverside

	No. of Outlets	% of Total Outlets	Gross Floorspace (sqm)	% of Total Floorspace
Convenience Retail	7	6.3%	17,920	11.9%
Comparison Retail	17	15.2%	17,360	11.5%
Variety Retail	4	3.6%	8,320	5.5%
Bulky Goods	20	17.9%	39,110	26.0%
Other Retail	6	5.4%	22,160	14.7%
Retail Services	13	11.6%	4,480	3.0%
Leisure Services	18	16.1%	8,870	5.9%
Other Uses	22	19.6%	27,020	18.0%
Vacant	5	4.5%	5,090	3.4%
Total	112	100.0%	150,330	100.0%

Source: Experian Goad

162. The convenience retail offer is led by Sainsbury's (6,990 sqm) and Asda (6,150 sqm) and is supplemented by Aldi (1,750 sqm) and The Food Warehouse (Iceland) (970 sqm). Despite only occupying 6.3% of the total units in the area, the floorspace coverage represents 11.9%, emphasising the large format convenience retail offer at Charlton Riverside.
163. The comparison retail offer can be found across Brocklebank Retail Park, Peninsular Retail Park and Greenwich Shopping Park. Operators include Primark (2,950 sqm), Matalan (1,980 sqm), Smyths Toys (1,970 sqm), Next (1,630 sqm), Dunelm (1,110 sqm) and Boots (1,040 sqm). Comparison retail makes up 15.2% of all units, and 11.5% of all floorspace.
164. Variety retail is characterised by operators offering a combination of convenience and comparison retail goods, whereby there is a substantial presence of each. These operators within Charlton Riverside are Marks & Spencer (3,790 sqm) (clothing and foodhall), Home Bargains (2,150 sqm), B&M Bargains (1,980 sqm) and Poundland (400 sqm).
165. Bulky goods (DIY, furniture and appliances) are the dominant retail and leisure-based use within the centre, occupying 17.9% of the units, and 26% of the floorspace. Ikea and B&Q are located to the west of the centre and combine to make up 61% of the bulky goods floorspace. Other notable operators include Currys, DFS and Wren Kitchens.
166. Other retail consists of cash & carry formats, warehouse clubs and wholesalers. They occupy a substantial quantum and proportion of floorspace within the centre (22,160 sqm, 14.7%), with Makro being the largest of the operators (11,210 sqm).
167. Retail services occupy 11.6% of the total outlets at Charlton Riverside, but just 3% of the floorspace, which is typical for these uses and operators that require smaller footprints. Retail services present include petrol filling stations, car repairs and other services and opticians.
168. Leisure services are the second most common retail and leisure-based use within the centre, occupying 16.1% of the centre. The Odeon cinema has a total of 14 screens and takes up 3,350 sqm of floorspace at the western edge of the centre. With regards to food & beverage leisure services, Franky & Benny's was captured within the survey but has now closed, whilst Nando's, Pizza Hut, McDonalds, Burger King, Starbucks and Costa are all on offer. A hotel (Holiday Inn Express) and gyms (PureGym and Anytime Fitness) are also operating within Charlton Riverside.
169. Other uses consists of offices, financial & business services (such as builder merchants), self-storage and more. This use occupies almost 1 in 5 units (19.6%) and 18% of the total floorspace.
170. There are five vacant units in Charlton Riverside, which represents a low vacancy rate of 4.5% and equivalent floorspace vacancy rate of 3.4%, with both values representing a low vacancy rate, which is well below the London average. This is evidence that the area is performing well and indicates that units are in demand.

MARKET SHARES

171. The retail market share review in Section 2 of Volume B highlights that the Charlton Riverside Area (attracts the highest proportion of convenience and comparison goods expenditure that is retained in the borough.
172. The table below shows how retail and food and beverage market shares for the Charlton Riverside area compare to market shares for Eltham and Woolwich.

Table 13: Market shares for Greenwich Peninsula/ Greenwich Shopping Park

Convenience Retail Market Shares	Zone 1	Study Area	Inflow Uplift	Total
Woolwich	9%	4%	17%	6%
Eltham	8%	4%	9%	6%
Greenwich Peninsula/ Greenwich Shopping Park	16%	8%	22%	12%
Comparison Retail Market Shares	Zone 1	Study Area	Inflow Uplift	Total
Woolwich	6%	3%	20%	5%
Eltham	10%	6%	9%	10%
Greenwich Peninsula - Greenwich Shopping Park	20%	12%	98%	32%
Food & Beverage Market Shares	Zone 1	Study Area	Inflow Uplift	Total
Woolwich	1%	1%	48%	2%
Eltham	2%	1%	21%	3%
Greenwich Peninsula - Greenwich Shopping Park	2%	1%	67%	3%

173. The table shows that Greenwich Shopping Park / Greenwich Peninsula is attracting a considerably higher proportion of retail expenditure than Woolwich and Eltham. For food and beverage expenditure, Greenwich Peninsula / Greenwich Shopping Park has a comparable market share to Eltham (and higher than Woolwich), but notably it generates a considerable uplift in expenditure from customers residing beyond the Study Area.

POTENTIAL IMPACT OF COMPETING CENTRES

174. Charlton Riverside's retail parks face strong competition from major shopping destinations outside of Royal Greenwich, especially from:
- Bluewater (Dartford) – A large regional mall with extensive fashion, homeware and leisure offers that attract higher-order comparison spending from South-East London.
 - Westfield Stratford City – Another major regional centre with excellent transport links and a strong, modern retail and leisure mix that draws customers from across East and South-East London.
 - Nearby major town centres including Bromley, Lewisham and Bexleyheath, each offering broader or more established comparison retail than Charlton's retail parks.

- Other large retail parks and destinations in the Thames Gateway, such as Lakeside, also capture comparison spending that might otherwise support Charlton.

175. Overall, these competing centres provide stronger, more diverse comparison retail and leisure environments, drawing significant customer spend away from Charlton and limiting its potential to compete in higher-order retail markets

SUMMARY AND POLICY CONSIDERATIONS

176. Charlton Riverside area serves an important role in accommodating major foodstores and bulky goods retailers that required large floorplates and adjacent customer parking, requirements that can be hard to support in centre locations, particularly in London. However, there is a concern that the area will be a magnet for future investment in retail offer, such as new foodstores and high street retailers. Therefore, policy should seek to limit growth of the centre (or where growth is proposed it is subject to the sequential and impact tests) and ensure that comparison retail offer continues to primarily serve a bulky goods retail and trade retail function.

6. RETAIL CAPACITY & LEISURE NEEDS ASSESSMENT

177. The detailed retail capacity and leisure needs assessment for RBG and the main centres within it is provided in Volume B of this study. The assessment should be read alongside the assessment tables provided in the accompanying appendices to Volume B.
178. It has been assumed for the purpose of the retail capacity assessment that the local retail and leisure market in Royal Greenwich is in 'equilibrium' at the base year. In other words, all existing centres/stores are broadly assumed to be trading in line with expected average ('benchmark') turnover levels. This is a reasonable approach in this case as it reflects difficult trading conditions within the retail sector over the past 5 years and the significant growth in online sales on the trading levels and performance of retailers and stores across the UK.
179. The capacity forecasts are presented at borough level to help inform potential need to identify new sites for retail development. Whilst capacity is also presented by centre and location, we do not recommend that these figures are used to identify specific quantum of floorspace capacity within policy and should be treated as indicative only. Instead, borough-wide 'capacity' should be directed to existing or proposed new centres in line with the national and local 'centres first' policy principle.
180. Leisure need is based on a qualitative review of existing provision of key commercial leisure categories and an indicative quantitative assessment undertaken for cinema screens and gym/fitness facilities is provided.

RETAIL CAPACITY FORECASTS

181. We advise the Council that the greatest weight should be placed on the short-term forecasts (carried out up to a five-year period), which can also assist with Development Management decisions. Whilst capacity forecasts covering a shorter period of time are more certain, notwithstanding this, and also consistent with the NPPF (Paragraph 90(d)), account should also necessarily be taken of the forecast growth over a longer period (at least ten years ahead).
182. The detailed capacity tabulations for convenience and comparison goods are set out in Appendix B5, **which account for the turnover of** planned convenience goods and comparison goods floorspace.

Convenience Goods Capacity

183. The first step in the capacity assessment is identified need based on a no-development scenario for new retail development over the study period (i.e. without accounting for pipeline floorspace from extant planning application approvals). On this basis, 428 sqm (net sales) of convenience floorspace is identified in the short term to 2030, increasing to 884 sqm, and 1,074 sqm, by

2035 and 2047, respectively. Focusing on the 10-year need, this broadly equates to two 'local' format foodstores, such as Tesco Express, Sainsbury's Local, etc. Alternatively, it could support an extension to an existing foodstore.

184. Once the estimated turnover from committed convenience retail floorspace is accounted for no further capacity is identified over the 10-year period to 2035, with a negligible quantum of floorspace capacity by 2037.
185. Forecasts at the centre level should be treated as indicative but suggest that there is no, or limited forecast capacity identified for Royal Greenwich's centres over the entire study period. This is due to allowances for existing retailers to improve the efficiency of their floorspace, and the increasing market share of online expenditure. These two factors reduce the quantum of residual expenditure to support new convenience goods floorspace.
186. There is modest aggregated capacity identified for out of centre locations, with is mainly attributed to net residual expenditure generated from foodstores at Charlton Riverside. However, this potential 'need' should be treated with caution as it is likely that this could be accommodated within the existing stock of space, either through the reoccupation of vacant space or changes in the offer provided in existing units which would not require planning permission.

Comparison Goods Capacity

187. There is no identified borough-wide capacity for new comparison goods retail floorspace over the broad 10-year period to 2035 even before accounting for pipeline comparison retail floorspace. By 2037, some 263 sqm (net sales) of comparison retail floorspace emerges.
188. While only a small quantum of permitted comparison retail floorspace is identified over the assessment period (i.e. extension to the Argos store at Charlton) the turnover of this floorspace absorbs the majority of the longer term floorspace need.
189. At centre-level, there is no or limited capacity to support new comparison retail floorspace and for the same reasons highlighted in respect to convenience goods capacity i.e. due allowances for existing retailers to improve the efficiency of their floorspace, and the increasing market share of online expenditure.
190. In summary, the assessment confirms there is no capacity to support new retail floorspace in Royal Greenwich based on forecasts on population growth and expenditure.
191. The results reflect retail market trends nationally where investment in new retail store openings has slowed and retailers focus growth on stronger performing centres and online.

COMMERCIAL LEISURE NEED

192. The trends analysis in Volume B highlights how the commercial leisure industry faces considerable challenges and pressures. It is clear that consumers are

becoming increasingly selective in terms of where and how they spend their discretionary leisure spending, but new activities and innovative offers will continue to evolve and attract people.

193. However, there will also be a continued increase in at-home activities due to the advances in computers, tablets, television, gaming, and audio technology. The challenge for town centres and leisure operators in the future will be how to attract customers away from their homes.
194. Royal Greenwich supports a large enough resident catchment to support continued investment and market interest from new commercial leisure operators, particularly in respect to the borough's popular visitor destinations.
195. For Woolwich in particular, regeneration proposals coming forward offer significant potential to create a visitor destination for F&B and potentially new leisure entertainment facilities.
196. For Eltham and the borough's district centres, investment in new leisure provision is likely to come forward organically.
197. In terms of capacity, forecasting the need for new leisure uses is more problematic than for retailing, as the sector is highly complex and dynamic. The demand for existing and new leisure uses and facilities is particularly sensitive to changes in economic, demographic, lifestyle and fashion trends and those in the business are often unable to look more than a few months ahead.
198. From a planning policy perspective therefore the key to meeting future, as yet unknown needs, will be the development of policies that can accommodate the changing needs of the sector and can operate in the real world. This includes recognising that for many leisure uses the level for entering a new market will be relatively high and, unlike retail outlets where store size can vary significantly, incremental development is unlikely if only small increases in market growth are identified. For instance, a new cinema or bowling alley will need a certain number of screens or alleys to be commercially viable.
199. It is also the case that the recent changes to the Use Classes Order mean that the main commercial leisure sector in terms of spend – Food and Beverage encompasses both Class E and Sui Generis uses. As a result, any changing demand for restaurant and café uses is likely to be met by changing uses within the existing or committed town centre floorspace. This trend was already apparent before 2020 with many developments seeking permission for flexible A1/A3 uses, but now, planning permission is not required to change between these uses.

SUMMARY

200. This refresh of the capacity figures has yet again indicated that over a 10-year period to 2035 (in line with NPPF paragraph 90(d)) there is no identified borough-wide capacity for comparison and convenience goods and there is no need to identify and allocate new sites for retail development.

201. Any capacity findings for individual centres must be seen in the context of the global capacity. This does not preclude facilitating any further investment or improvements to town and district centres. However, the absence of forecast need for new retail floorspace for any of Royal Greenwich's centres indicates that there is an oversupply of retail floorspace. This presents opportunities to promote the repurposing of retail accommodation, particularly in centres where there are persistent vacancies and where retail is struggling.
202. A robust policy approach should therefore be adopted, especially development management policies in accordance with the NPPF (paragraphs 90 – 95), to enable the assessment and determination of future proposals that are not in a centre and not in accordance with an up-to-date development plan.
203. It should also be noted that the capacity findings are based on ONS projections rather than population based on housing supply projections. Therefore, localised capacity may be identified for major housing-led regeneration areas where there is a lack of existing retail and leisure facilities.
204. Overall, capacity and opportunities to support new retail and leisure development should be directed to the existing network of centres or new centres to support major housing development.

7. MARKET DEMAND ASSESSMENT

205. This section considers the findings of the retail and leisure needs assessments summarised in Section 6 (based on the detailed assessments in Volume B) and considers whether there is interest from the market. We then consider how identified quantitative and qualitative need and market demand can be accommodated within Royal Greenwich's town and district centres, and the typical requirements for retail and leisure operators.

RETAIL NEEDS AND MARKET DEMAND ASSESSMENT

206. This assessment has been prepared in the context of the many issues and challenges facing the UK's retail sector and high streets. These challenges have been driven by a combination of economic pressures, technological change (which has driven the growth in online activity and sales) and shifts in consumer behaviour. This has resulted in a significant year-on-year rise in business failures, with the resultant closure of stores and the significant loss of jobs. The pandemic has further accelerated and compounded these trends, while the current cost of living crisis is expected to slow down retail sales and spend on leisure.
207. As highlighted in Section 3 the retail market is particularly volatile as brands that were at one time considered to be immune to retail shock waves have collapsed. Even online brands are failing such as the recent demise of Made.com (which has now been acquired by Next). Notably the rapid success of online fast fashion brands which created major online giants (ASOS and BooHoo) are facing challenges due to supply chain issues and scrutiny on working practices, which has seen previous market leaders facing collapse (e.g. Misguided). The key message is that there is continuous and significant downward pressure on retail values, at a time when retailers and landlords are facing rising costs and debts. In turn, this has led to many more retail operators being forced into administration and a rise in vacancies (see Section 3). Research indicates that Britain is over-shopped; meaning there is too much retail floorspace in our towns and shopping centres. In turn, these trends are all impacting on the capacity and market demand for new retail floorspace.
208. Royal Greenwich's town centres are not immune from these national and regional trends. The health check assessments show that the town and district centres are all generally performing well, but although some have experienced a loss in the number of retail and F&B brands.
209. The forecast retail capacity assessment summarised in Section 6 considered the need for new retail (convenience and comparison) floorspace in Royal Greenwich and its main centres over the ten-year period up to 2035, and over the lifetime of the plan (up to 2037). The capacity forecasts were informed by the latest forecasts published by Experian Business Strategies (Retail Planner Briefing Note 21). Experian's forecasts take account of the impacts arising from recent economic events and likely recovery scenarios on retail expenditure levels over the short,

medium, and long term, and the growing market share of non-store retail sales (specifically online purchases).

210. The headline figures show limited capacity for new convenience retail floorspace over the ten-year forecast period to 2035 for the Borough as a whole, and no capacity for new comparison retail floorspace over the assessment period.
211. In terms of market demand for new retail operators, the health check assessment identified retailers that have registered interest in locating within Eltham and Woolwich town centres, and the district centres of Blackheath, Kidbrooke, and Thamesmead. Requirements were also identified for Shooters Hill. The table below summarises national retailers that have registered interested within the 12 months to February 2025.

Table 14: Retail & Leisure Requirements – 12 months to February 2025

	No. Operator Requirements	Key Operators/ Brands	Min Sqm	Max Sqm
Eltham	8	NRG, Hotpod Yoga, Lidl	5,565	9,922
Woolwich	13	Deichman, Cook, Travelodge	2,587	9,392
Blackheath	21	M&S Food, The White Company, Anthropologie, Everyman, Schmidt, Bill's Travelodge, Megan's	5,624	16,157
Greenwich West	21	Everyman, Cote, Hone Poke, Soderberg, Vapiano, Megan's, Savers	3,385	6,295
Kidbrooke	3	M&S Food, Lidl, Premier Inn	2,230	4,784
North Greenwich	1	M&S Food	557	2,323
Plumstead	1	Lidl	1,672	2,462
Thamesmead	2	Lidl, Topps Tiles	2,415	4,134
Abbey Wood	11	Savers	186	372
Shooters Hill	2	M&S Food, Lidl	2,230	4,784
Total	82		24,779	58,164

Source: Appendix C.1

Notes: Where centres are not listed this is due to no recorded requirements.

212. There are likely to be requirements from operators that have not been recorded, where brands may be seeking sites on a confidential basis. However, the listed requirements provide some indication on the attractiveness of the Borough's centres to the market.
213. It should be noted that smaller independent retailers do not typically publish requirements in the same way that the larger retail groups do. This section of the market is reasonably buoyant, and we (Lambert Smith Hampton) receive significant volumes of enquiries for smaller, lower rented shops in Greater London from SME's.

214. The following considers market demand for the different retail and leisure sectors in more detail.

Convenience Retail

215. As the table above shows, opportunities for new retail investment are led by the convenience food sector, notably M&S Food and Lidl.
216. M&S operate several convenience stores, most of which are Simply Food formats, rather than the larger M&S Food stores. The retailer is seeking to expand their M&S Food format portfolio nationwide. Target locations in Royal Greenwich include Greenwich West, Blackheath, Kidbrooke, and Shooters Hill.
217. Lidl has four stores in the borough (Woolwich, Eltham, Charlton, and Abbey Wood) and is seeking four additional sites in Plumstead, Kidbrooke, Thamesmead, and Shooters Hill.
218. Meeting foodstore operator site requirements can be challenging in town centres, particularly for operators such as Aldi and M&S who are generally unwilling to compromise on standard site requirements for new stores although there are examples in certain London locations where they have shown some flexibility in relation to store size and customer car parking. Lidl's ideal site requirement is a minimum site area of 0.6 hectares to support a minimum store size of 2,300 sqm gross and at least 100 dedicated parking spaces. They also have a smaller metro format store for High Street locations where their standard requirement cannot be accommodated.
219. Standard site requirements for M&S Food formats in London areas include sites that can accommodate a store size ranging between 557 sqm to 2,323 sqm gross, are situated in prominent locations, and with dedicated parking or nearby parking.
220. Other convenience retail brands that have recorded interest in sites in the borough's towns include a small number of premium and niche brands.

Comparison Retail

221. Recorded requirements from the comparison retail sector is considerably more limited than convenience retail, which reflects a more cautious approach to store portfolio growth that has been adopted in recent years by key brands. This reflects a contraction in physical comparison retail stores nationally.
222. Interest is generally muted for most of the borough's centres and is typically from charity shop brands or value retailers. The exception is Blackheath where there are 10 requirements from comparison retailers: ranging from charity shop operators to premium high street brands (The White Company and Anthropology).
223. In summary, market demand for new retail is principally led by the supermarket and value retail sector and will be for the foreseeable future. Opportunities within the comparison retail sector are limited with opportunities mainly driven by budget and charity shop operators, or in stronger centres with more affluent catchments (e.g. Blackheath).

224. However, the challenge is directing new investment in the Borough's larger centres, such as Woolwich where there is an opportunity to strengthen retail offer as part of the town's ongoing regeneration.
225. As highlighted earlier, not all national operators allow their requirements to be published so there may be other operators seeking space in Royal Greenwich's centres, including independents.

LEISURE NEEDS AND MARKET DEMAND ASSESSMENT

226. This section sets out the high-level assessment of the potential need for new leisure uses and facilities up to 2035, and over the lifetime of the plan to 2037.
227. It is difficult to predict the need for new leisure uses, as the sector is very diverse and highly influenced by market, lifestyle, and consumer trends. Therefore, aspirations to improve leisure offer in the borough and the results of the needs assessment for leisure uses in Volume B need to be tempered with what can be achieved in the market.
228. The following considers the market reality of delivering investment, which takes account of identified operator requirements.

Cinema

229. The screen capacity assessment identified no further capacity to support new screens in the Borough over the plan period due to existing cinema provision.
230. Recorded requirements identify interest from boutique operator Everyman Cinemas, although interest is focused on Greenwich West and Blackheath.
231. However, geographically cinema provision is located to the west of the borough (The O2, Greenwich West, and Eltham) and there appears to be a gap in cinema provision to east of the Borough, particularly Woolwich. The Council may wish to explore potential opportunities to promote a multiplex cinema as part of the regeneration plans for the centre.

Food and Beverage (F&B)

232. The market share analysis indicates that a considerable amount of expenditure on F&B spend is lost to centres outside the borough, such as London's West End and other parts of the city, with a surprisingly limited market share for the borough's larger centres.
233. There are 25 recorded requirements from F&B operators seeking sites in the borough, with over half (16) seeking sites in Greenwich West, followed by Woolwich (4) and Blackheath (3).
234. The focus of interest on Greenwich West will reflect the centre's year-round visitor market. Brands seeking sites in the centre range from trendy independent London brands (Soderberg, Three Uncles, Megan's) to national casual dining brands (Cote, Bills, Vapiano).

235. There are likely to be unpublished requirements from other restaurant chains and the independent sector who are likely to seek opportunities in locations in Greenwich West and Blackheath where there is sufficient footfall. For example, the two centres already support restaurant chains (Wagamama, Sticks 'n Sushi, Pizza Express, Gails, Honest Burgers, and Banana Tree in West Greenwich; and Cote, The Ivy Café, Pizza Express, and Gails in Blackheath and West Greenwich) which increase the appeal for other chains that may wish to co-locate and/or compete with existing chains.
236. There is also likely to be interest from branded operators for commercial outlets in development sites coming forward in Woolwich, particularly those that support prominent positions within the centre and attract good footfall (e.g. close to the station and waterfront).
237. Where there are opportunities to target new brands by accommodating requirements at the design stage of projects then the following general site requirements (sourced from The Requirements List database in May 2025) should be considered:
- Majority of smaller casual dining brands are seeking units supporting 93 sqm to 232 sqm but increasing to 465 sqm to 1,115 sqm for major chains (e.g. The Breakfast Club, Vapiano, Côte, etc).
 - Fast food and quick serve restaurants (QSR) brands (examples include McDonald's, Wagamama, Pizza Express, Pret A Manger, etc) are generally seeking units of 115 sqm to 325 sqm.
 - Use Class E but flexibility for Sui Generis (Hot food takeaway) where needed.
 - Ability to service home delivery vehicles.
 - Typically require leasehold tenure over freehold.
 - Busy, vibrant locations that offer all-day trading (for casual dining brands in particular).
 - Accessible to main retail pitch, theatres/cinemas, and commercial areas.
 - Many casual dining brands seek external seating area.
238. In the meantime, the flexibility of Class E will allow F&B opportunities to arise where demand is identified by independent and branded operators, where previously planning policy constrained the ability for F&B to come forward.
239. At this stage, we do not consider that there is a requirement to identify specific sites to accommodate future need for F&B provision.

Health and fitness

240. A review of published property requirements for gym and fitness operators identified limited interest in the Borough, which is mainly generated from smaller chains (NRG) and yoga and Pilates operators (Hotpod Yoga, X Club, Club Pilates).

241. The lack of interest from major gym chains may reflect cautious expansion plans during a cost-of-living crisis and when the sector is still in recovery post-Covid.
242. Feedback from LSH leisure agents reflect what is identified from the review of published property requirements, which is that opportunities will be focused on smaller operators seeking flexible unit space and in locations close to transport hubs in the Borough. More affluent centres such as Blackheath will be the focus of premium niche fitness/ wellness led gym businesses such as Pilates/yoga studios.
243. Whilst opportunities to attract larger gym brands will be muted, as highlighted above, feedback from agents indicate that should interest arise in the future it is more likely to be focused the Borough's larger centres. Gym representation is generally good in the majority of the Borough's larger centre, although Woolwich is a more likely opportunity area for investment – the centre is not as well represented by larger gym brands and regeneration plans will drive demand for more gym provision.

Other Commercial Leisure Uses

244. Regarding other commercial leisure uses, there is currently no identified market demand for gambling venues (e.g. bingo halls and casinos), tenpin bowling, trampoline parks, or other facilities. This is mainly due to the limited catchment potential of the Borough's town centres and the proximity of leisure facilities in larger centres in neighbouring authorities.
245. There is growth in the family entertainment and active leisure market, with emerging brands seeking sites nationally. This includes operators seeking sites nationally for trampoline parks, obstacle course themed activities, social competitive activities, and niche active leisure (e.g. padel, rock climbing and bouldering).
246. Whilst there no identified requirements from this sector for Royal Greenwich, we note that several operators are seeking sites across London, such as Ghetto Golf and Golf Fang, a crazy golf operator that sits within the competitive socialising market. The operator is seeking units that provide accommodation of 1,400 sqm to 2,800 sqm with a 5m+ clear floor to ceiling height and at edge of city locations. Flip Out, a trampoline park operator has identified Croydon as a target location, but there could be opportunity to attract this operator, albeit this would likely be focused on industrial or standalone units.
247. However, opportunities to support new active leisure brands will be constrained by a lack of available sites. Industrial property values are high which will discourage asset owners from considering lower value uses such as leisure. Where industrial sites are redeveloped, they are supporting either logistic or residential uses.
248. As highlighted in respect to retail market demand, not all national leisure operators allow their requirements to be published so there may be others seeking space in the Borough's town centres.

Summary

249. The assessment highlights strong demand for new retail and leisure operators across Royal Greenwich, with 82 recorded requirements between February 2024 and February 2025, totalling 24,779–58,164 sqm. Demand is concentrated in Blackheath and Greenwich West (21 requirements each), followed by Woolwich (13) and Eltham (8). Convenience retail dominates, led by M&S Food and Lidl, both seeking multiple sites. Lidl aims for four additional stores, while M&S targets key centres such as Blackheath and Kidbrooke. Meeting these requirements is challenging due to strict site specifications, particularly for parking and store size.
250. Comparison retail interest is limited, reflecting national contraction, with notable exceptions in Blackheath where premium brands like The White Company and Anthropologie show interest. Overall, growth is driven by supermarkets and value retailers, while opportunities for comparison retail remain modest.
251. Leisure demand is diverse but constrained. Cinema capacity is saturated, though boutique operator Everyman shows interest in Greenwich West and Blackheath. Food and beverage operators present significant opportunity, with 25 recorded requirements—primarily in Greenwich West—ranging from trendy independents to national chains. Health and fitness interest is minimal, focused on smaller operators like NRG and Hotpod Yoga. Other leisure sectors, such as active entertainment, show emerging national trends but face local site availability challenges.
252. In summary, retail and leisure investment will continue to be led by convenience and F&B sectors, with strategic opportunities to strengthen Woolwich and other centres through regeneration and targeted site planning.

8. POLICY RECOMMENDATIONS

253. This final section provides high-level advice and recommendations to help the Royal Borough of Greenwich (RBG) effectively plan and manage the vitality and viability of its network of centres over the lifetime of the plan through appropriate town centre policies. The advice focuses on the next five to ten year period (up to 2035) in accordance with the advice set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). The NPPF states that planning policies and decisions should support the role that town centres play “...at the heart of local communities” and should promote the long term vitality and viability of centres, “...by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters” (paragraph 90a).
254. Our policy and strategy advice is based on assessments of the quantitative and qualitative need for new retail (comparison and convenience goods) floorspace and commercial leisure uses over the forecast period. These assessments have been informed by a comprehensive review and update of the dynamic economic and market trends that are impacting on the retail and leisure sectors.
255. It is against this background that we provide the Council with our robust recommendations on town centre policies to help inform plan-making and decision-making over the next 5-10 years, and over the lifetime of the plan up to 2037. The advice covers the following:
- the appropriateness of the 2014 Core Strategy centres hierarchy and whether any amendments are required to the centres hierarchy for inclusion in the new Local Plan;
 - commentary on the extent of RBG’s existing town centres and primary shopping areas, and whether any appropriate spatial and use changes are required to that provided for under the 2014 Core Strategy, and consideration regarding a defined town centre boundary for North Greenwich District Centre;
 - commentary on Woolwich’s current Major Centre status and the Council’s aspirations for the centre to achieve Metropolitan Centre status, its current status, the likelihood of achieving a Metropolitan Centre status and what changes may be required to achieve this status;
 - consider potential policy to manage the provision of town centre uses at Charlton Riverside’s out of centre retail and leisure destinations;
 - consider the potential for the reconfiguration of Thamesmead District Centre around the proposed DLR extension; and
 - assess the appropriateness of the existing development plan policy approach for retail and leisure uses across the Borough in order to inform emerging policies for the new Local Plan.

1) THE APPROPRIATENESS OF THE 2014 CORE STRATEGY CENTRES HIERARCHY

256. Section 2 provided an overview of the Core Strategy's centre hierarchy which guide the strategic and development management policies for the borough's centres. Consideration is also given to the London Plan classification of centre designations, which the Core Strategy aligns with.
257. Using the findings from the retail market share analysis (Volume C) and health check assessments (Volume B) we can evaluate whether the borough's main centres are performing against their centre designation. This provides an indication on the appropriateness of the current centre hierarchy.
258. The table below provides a summary of retail market shares for each centre and how the centres compare in size based on the total number of commercial town centre outlets in each centre:

Table 15: Retail market shares and commercial outlets

Centre	Convenience Goods Market Share Including Inflow	Comparison Goods Market Share Including Inflow	No. Town Centre Commercial Outlets
Town Centres			
Woolwich	5.6%	4.6%	320
Eltham	5.8%	9.5%	205
District Centres			
Blackheath	0.1%	1.2%	113
Greenwich East	0.7%	0.4%	134
Greenwich West	1.1%	1.3%	211
Lee Green	3.1%	2.4%	48
Plumstead	0.4%	0.2%	121
Thamesmead	0.9%	0.7%	28
Non-designated Centres			
North Greenwich	0.5%	1.9%	137
Charlton Riverside/ Shopping Park	12.2%	31.9%	98

259. The findings of the market share analysis and review of town centre uses across the borough' towns and district centres suggests that the centres are broadly performing against the role and function that is expected for their centre designation.
260. There is not necessarily a correlation between the size of the centre and its market share. For example, Eltham is a smaller centre compared to Woolwich and does

not have the same size of supermarket anchor, yet the centre is achieving higher retail market shares. This may reflect the centre's more traditional town centre environment, access to greenspace, better quality retail and service offer. It is also possible that market share in Woolwich may be depressed due to construction work in the centre, which may be discouraging shoppers.

261. We consider Woolwich's position in the hierarchy later in this section.
262. Turning to the district centres, the size of the centres does not necessarily correspond to the retail market share. . For example, Lee Green is the second smallest of the district centres based on the number of commercial town centre outlets, but it is retaining the higher market share of study area retail expenditure compared to other district centres. This is likely due to the presence of a large foodstore (5,430 sqm Sainsbury's store), which is lacking in other district centres. may indicate that the range of retail offer is meeting the needs of its resident catchment whereas other district centres are not.
263. There is a question as to whether Greenwich East, Plumstead and Thamesmead are performing against their role as district centres, particularly when compared with Greenwich West (also referred to as Greenwich District Centre), Blackheath and Lee Green. However, given the planned investment and regeneration of Plumstead and Thamesmead, these centres are likely to strengthen their position against the other district centres.
264. For Greenwich East, the centre is mainly catering to service uses, which account for 69% for all retail and service outlets. This is higher than other district centres. It is also noted that the centre's vacancy rate is above the London average (based on outlet and floorspace vacancy rate). While indicators suggest that the centre may not be performing as a district centre compared to the borough's other centres, we do not consider that it is underperforming to an extent that it should be positioned lower in the centre hierarchy.
265. Overall, we consider that the current centre hierarchy is appropriate, but should be subject to further review as part of any update to town centre policy evidence.

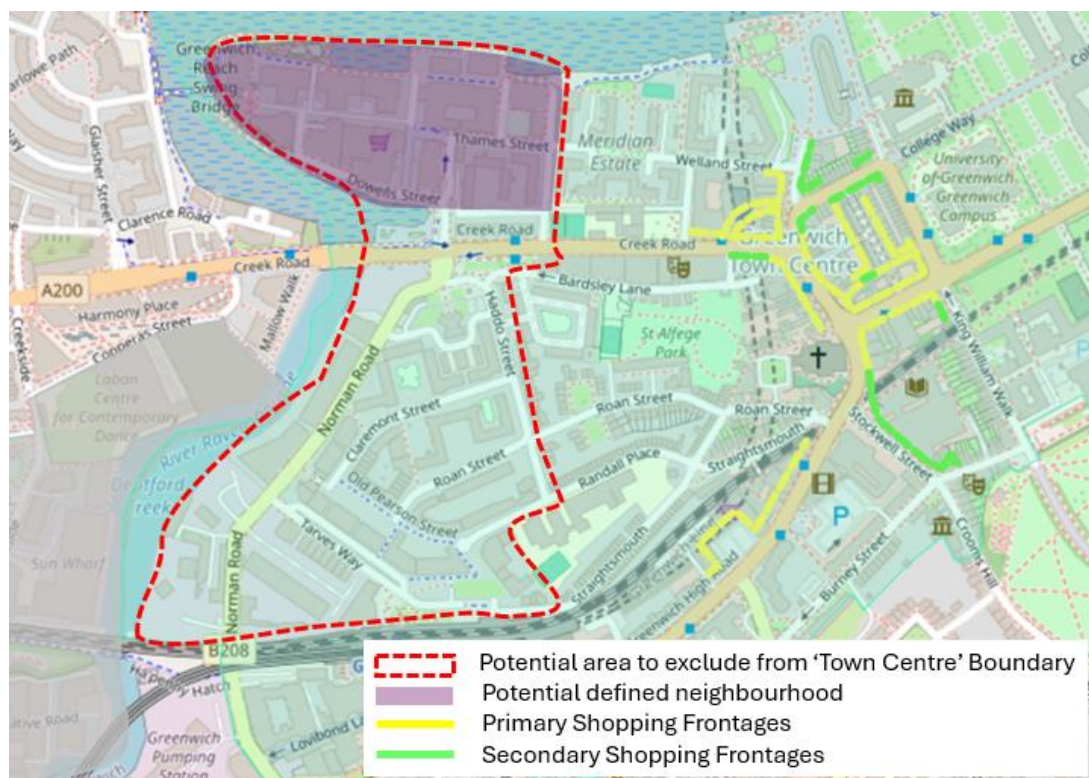
2) REVIEW OF TOWN CENTRE AND PRIMARY SHOPPING AREA BOUNDARIES

266. The NPPF also requires development plans to have planning policies that define the extent of town centres and primary shopping areas (PSAs) (NPPF, para 86(b)) and to specify the range of uses permitted in such locations as part of a positive strategy for each centre. The London Plan also expects local authorities to define the detailed boundaries for the CAZ, town centres and other town centre designations (Policy SD4).
267. The centre boundaries and primary and secondary frontages for the different types of centres in Royal Greenwich are currently defined in the 2014 Core Strategy. It is noted that Primary Shopping Areas are not defined. As there is no longer a requirement within the NPPF to identify shopping frontages and without any policy

merit in retaining them, we **recommend that the defined shopping frontages are combined and reclassified as PSAs** within the new Local Plan.

268. In many locations in the UK, the decline in the demand for retail space has led to a need to consider reducing the extent of the defined retail areas and sometimes the town centres as well. The majority of Royal Greenwich's town and district centres are experiencing vacancy rates that are either on par with or below London averages. At the same time the retail capacity assessment has indicated that there is no requirement to allocate new retail sites for development. As a result, we consider that generally the current shopping frontages (redefined as a combined PSA) and centre boundaries will remain appropriate for the new Local Plan.
269. The only exception is Greenwich West (also referred to as Greenwich District Centre), where the town centre boundary covers a much wider area compared to the borough's other town and district centres. While there may have been a reason for this, such as to encourage development, parts of the town centre are predominantly residential or can potentially support a separate neighbourhood function.
270. The area in question is outlined in Figure 11 overleaf and broadly relates to the area of the town centre boundary that lies west of Horseferry Road, Haddo Road, Old Pearson Street and Straightmouth. This area of the town centre boundary largely comprises relatively new build apartment blocks and what appears to be longstanding industrial warehouses (north of the railway line).

Figure 8: Greenwich West – Town Centre Boundary Review

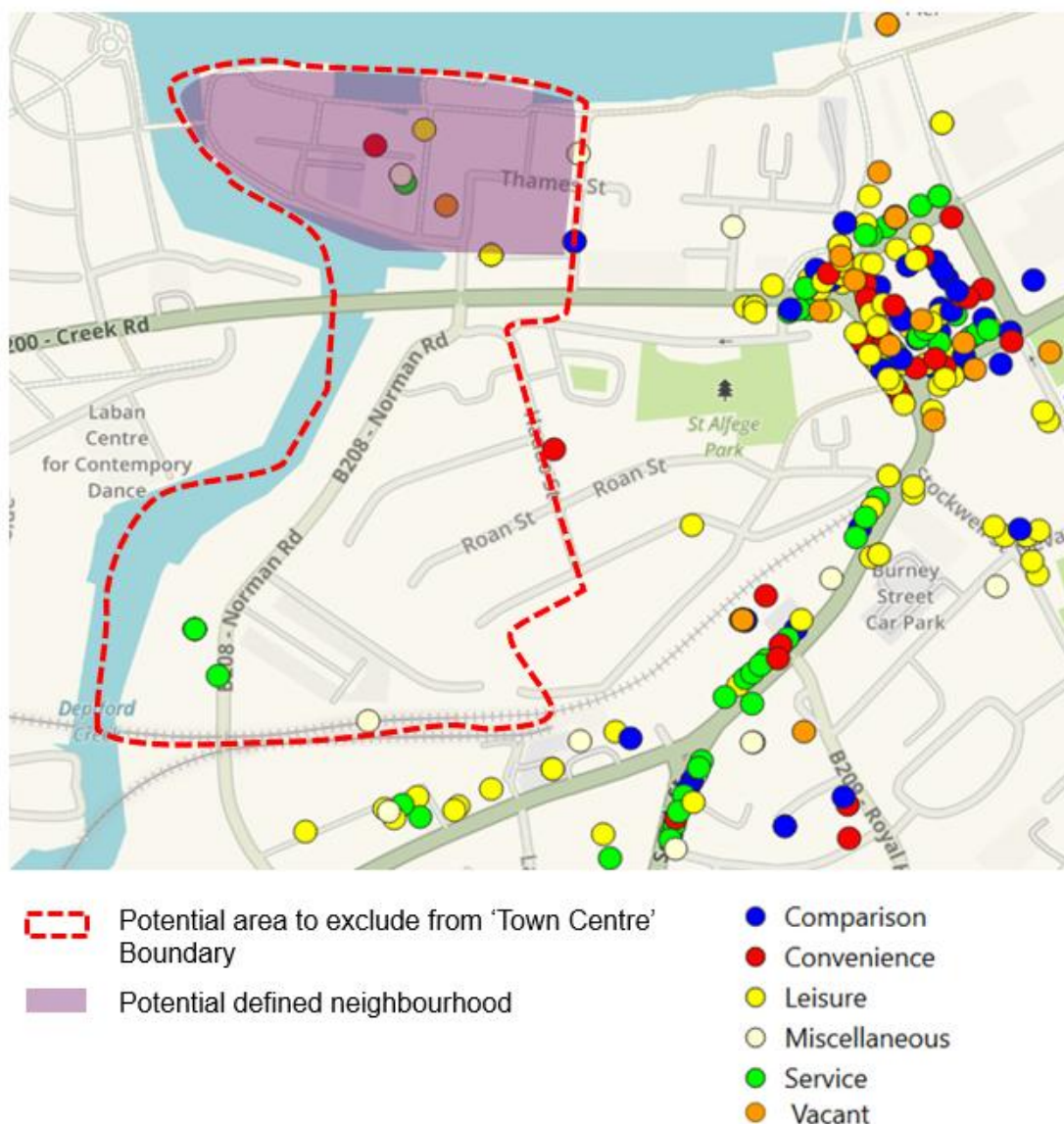


271. In addition, there may be potential to create a neighbourhood centre or parade for the excluded area that includes development around Victoria Parade. This area

has a number of facilities that are likely to support a local catchment that meets the day-to-day needs of the immediate community. For example, the area has a Waitrose store and range of service uses.

272. Figure 12 shows how the remaining area that is recommended for exclusion from the town centre boundary has limited town centre uses.

Figure 9: Town Centre Uses Activity



273. In Woolwich, the regeneration of Woolwich Arsenal covered a large swathe of land which sits within the defined centre boundary. The Armouries provides a connection with commercial activity within the wider centre, but less so regarding residential areas of Woolwich Arsenal located north of Duke of Wellington Avenue. The boundary still includes industrial areas around Skeffington Street that could come forward for redevelopment for residential and commercial uses.
274. The figures below show the area of the town centre that could be excluded and how town centre uses are limited.

Figure 10: Woolwich – Town Centre Boundary Review

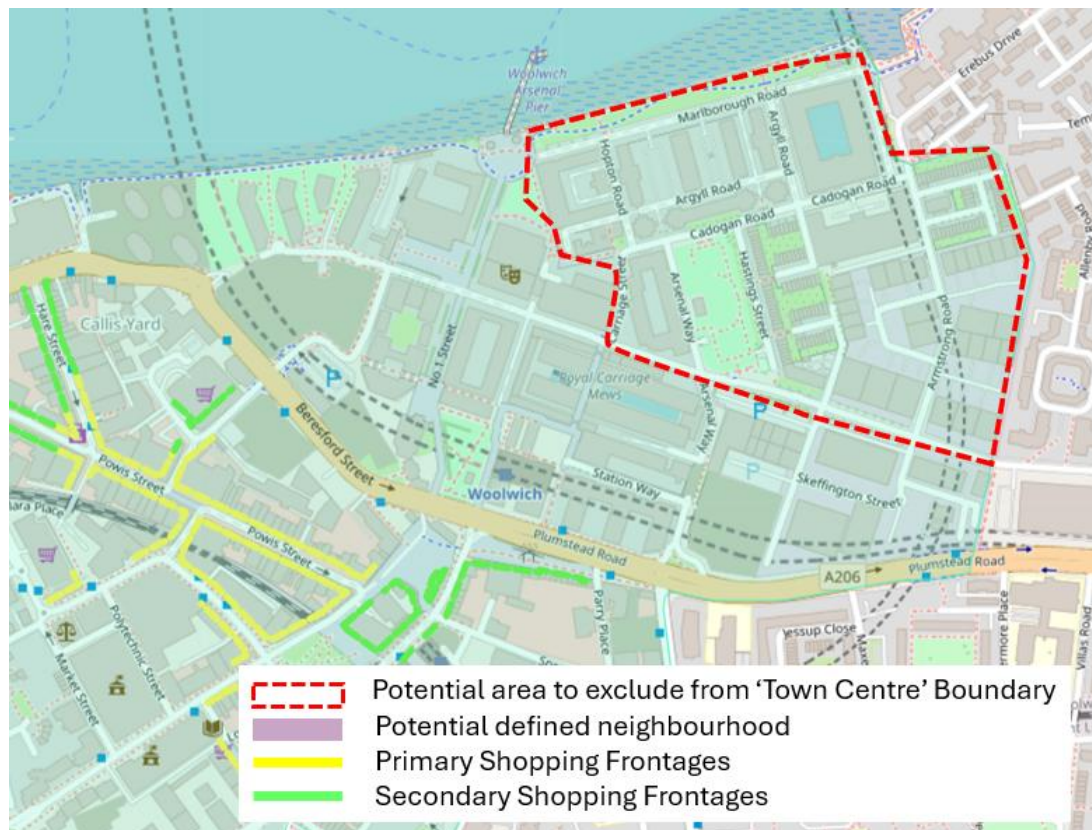
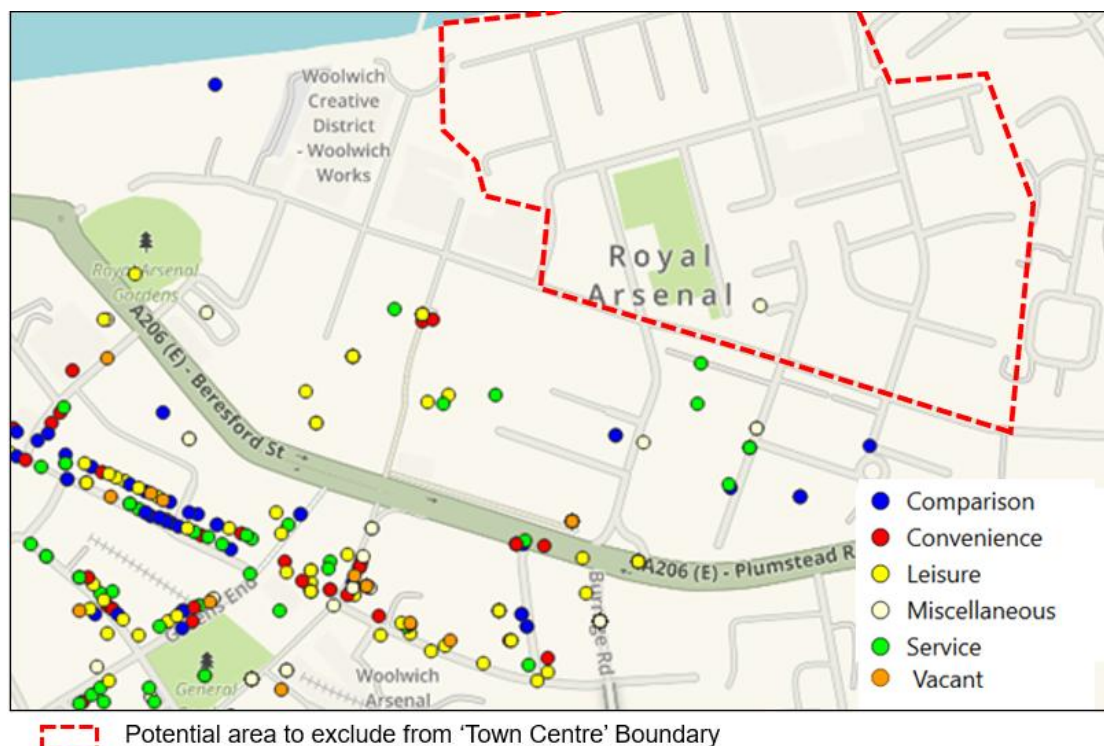


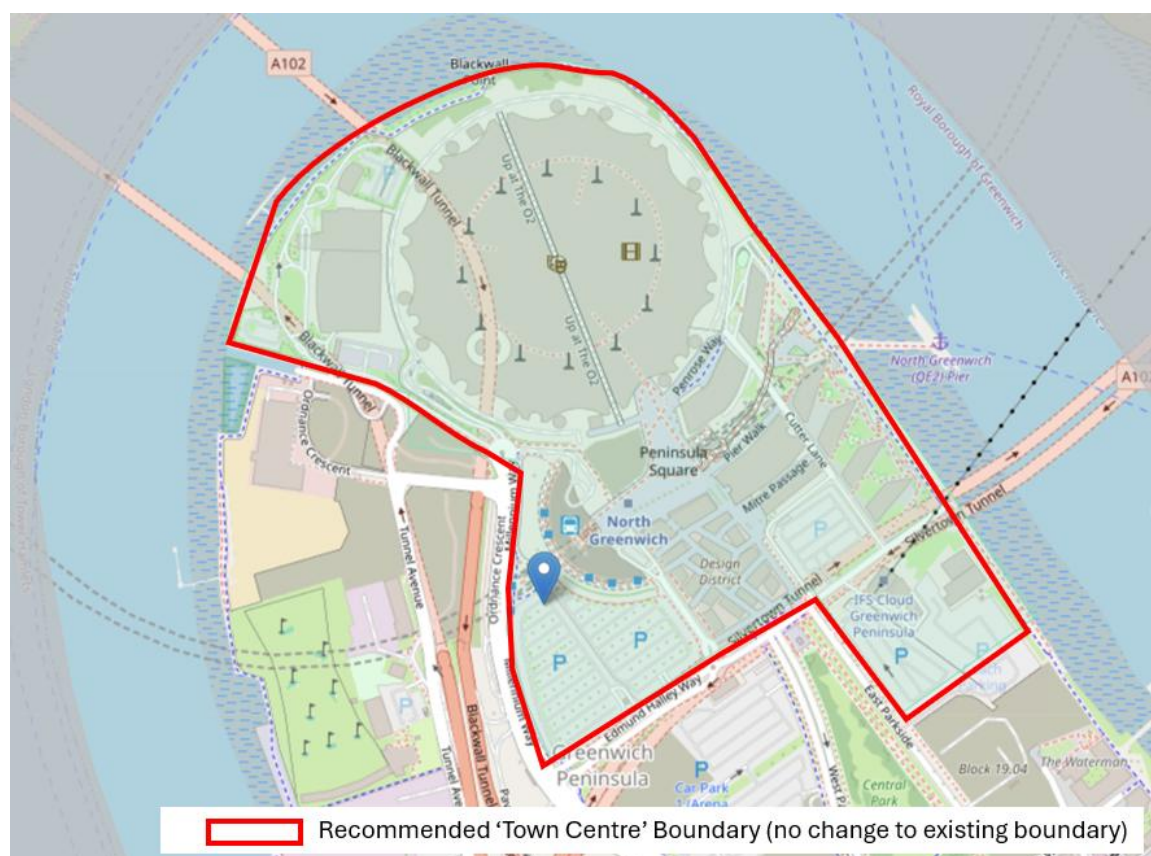
Figure 11: Woolwich – Town Centre Boundary Review



North Greenwich District Centre

275. The health check assessment for North Greenwich District Centre found that the majority of town centre uses are confined within The O2 Arena complex. Commercial uses are also located to the south of the complex; in and around Peninsula Square, North Greenwich station and mixed use developments off Cutter Lane and within the Design District.
276. The Core Strategy Policy Map identifies a 'town centre' boundary for North Greenwich which encompasses these areas as well as the main car parks south of North Greenwich station and also the IFS Cloud Greenwich (cable car station).
277. There are commercial uses to the west of the current boundary off Tunnel Avenue, but these uses are more akin to 'out of centre' uses (e.g. industrial uses and a golf range) rather than town centre uses.
278. We consider that this boundary, as shown below, remains appropriate and no changes are recommended at this time.

Figure 12: Recommended Town Centre boundary for North Greenwich



3) POTENTIAL FOR WOOLWICH TO ACHIEVE METROPOLITAN CENTRE STATUS

279. Woolwich is currently defined as a Major Centre in the Core Strategy and the London Plan, with both documents identifying the potential for the centre to be designated in the future as a Metropolitan Centre.
280. The London Plan's definition of Major Town Centres and Metropolitan Town Centres is summarised below:

Metropolitan Town Centre	"[S]erve wide catchments which can extend over several boroughs and into parts of the wider South East region. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods . These centres generally have very good accessibility and significant employment, service and leisure functions."
Major Town Centre	"[T]ypically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods . They may also have significant employment, leisure, service and civic functions."

281. Woolwich has benefited from and is still benefiting from major regeneration and the centre is going through transformative change as evident from the regeneration of Royal Arsenal and the subsequent connection with Crossrail that will have stimulated investment in other major regeneration projects.
282. The defined town centre area supports approximately 73,500 sqm of active retail, leisure, and service floorspace increasing to 78,950 sqm when vacant retail and service floorspace is included. This is below the quantum of retail, leisure and service floorspace that the London Plan broadly defines for Metropolitan Town Centres yet it is arguably well above the broad threshold for Major Town Centres.
283. The table below compares Woolwich Town Centre's retail and service floorspace against other defined Metropolitan Centres. The floorspace areas identified for the Metropolitan Centres is based on Experian Goad surveys and may not correspond to floorspace contained within the respective defined town centre boundaries. However, the data provides a good indication of how Woolwich performs, particularly in relation to retail offer.

Table 16: Indicative Floorspace by Metropolitan Centre and Woolwich

Centre	All Retail & Service	Occupied Retail & Service*	All Retail	% Convenience	% Comparison
Woolwich	85,700	73,780	38,390	45%	55%
Harrow	95,810	85,530	45,070	30%	70%
Uxbridge	96,790	72,530	43,170	30%	70%
Hounslow	102,190	76,320	50,190	45%	55%
Wood Green	108,600	100,600	64,530	29%	71%
Ilford	111,240	66,190	49,220	27%	73%
Bromley	132,490	113,190	67,830	18%	82%
Sutton	153,860	129,920	80,290	42%	58%
Stratford**	158,590	142,320	114,640	3%	97%
Kingston	179,280	156,540	97,150	16%	84%
Romford	195,610	175,490	100,380	68%	32%
Shepherds Bush**	221,130	180,480	125,810	10%	90%
Croydon	251,480	183,760	110,790	18%	82%

* Excludes vacant floorspace

** Includes Westfield shopping centres

284. The table shows that Woolwich accommodates a smaller quantum of retail and service floorspace but is not far off the quantum of floorspace supported by Harrow (11% less) and Uxbridge. When assessed against occupied retail and service floorspace, Woolwich sits above Uxbridge and Ilford.
285. Similarly, Woolwich has a lower quantum of retail floorspace; approximately 12% less than Uxbridge. Comparison retail offer accounts for just over 55% of retail floorspace and while this may not reflect a significant proportion of retail floorspace, this proportional representation is broadly in line with Hounslow and Sutton.
286. In terms of future development in Woolwich, there are a number of key projects that are coming forward that will increase the area's population and commercial offer. However, the extent of new retail and other typical town centre uses is relatively modest and based on the evidence on planned schemes (i.e. those with planning consent) the quantum of retail and service floorspace will not have noticeable increase in total floorspace. In contrast, a review of consents indicates that retail floorspace is shrinking due to the redevelopment of retail space for alternative uses.
287. It is also worth referring to retail market shares currently achieved by retailers in Woolwich based on the results of the transaction data analysis. As highlighted earlier in this section, Woolwich attracts a smaller market share of retail expenditure than Eltham, despite being a larger centre.
288. Based on the evidence of retail and service floorspace, comparisons to existing Metropolitan Centres, planned changes to retail floorspace, and retail market shares, we consider Woolwich should remain as a Major Centre within the Local Plan hierarchy. However, this should not discourage the potential to review the

centre's prospects in the future wherein there may be a case to support the centre's designation as a Metropolitan Centre.

4) POTENTIAL FOR CHARLTON RIVERSIDE TO ACHIEVE TOWN CENTRE STATUS

289. Section 5 of this report reviewed the current mix of town centre uses in Charlton Riverside, mainly focusing on existing commercial uses in and around Greenwich Shopping Park.
290. The area offers a good range of foodstore options. While there is a very strong offer of comparison retail it is largely geared towards bulky goods and other retail provision such as warehouse, trade, and cash and carry formats. There are a number of leisure uses, while other town centre uses are limited (retail services) or not available. This is unsurprising and reflects the nature of the shopping park which functions as an out of centre retail destination. This is consistent with the findings of market share analysis which shows that centre draws a broad catchment and given the availability of car parking and good access for cars, commands a higher proportion of retail expenditure than the borough's town and district centres.
291. Given the intention to create a new neighbourhood centre to serve the future residential community of Charlton Riverside regeneration area, we consider that the designation of the current shopping park and area as a town centre would be premature. More consideration should be given to how the new neighbourhood centre would tie with the existing shopping park area, assuming this area will be retained in its current format in the future.

5) POTENTIAL FOR THE RECONFIGURATION OF THAMESMEAD DISTRICT CENTRE AROUND THE PROPOSED DLR EXTENSION

292. Transport for London (TFL) are exploring the potential to extend the Docklands Light Rail (DLR) system from Gallions Reach to include stops at Beckton and Thamesmead. As well as improving public transport connections for the existing population, the project is expected to unlock the potential to deliver 25,000 to 30,000 new homes in Thamesmead.
293. The figure below is an extract from TFL's proposed route plan for the DLR extension and other public transport enhancements. As the plan shows, a new DLR station could potentially be located off Central Way and positioned within the existing defined district centre boundary.

Figure 13: Extract of the Proposed DLR Extension Route



Source: TFL

294. The exact location for the potential stations to serve Thamesmead have not been identified but based on the map above. This indicates that one of the station locations already falls within the defined town centre boundary for Thamesmead District Centre. There would be merit in expanding the centre boundary to accommodate the potential second station located south of Central Way if the scheme is to include commercial elements at ground floor and supports good pedestrian links to the current commercial area of Thamesmead District Centre.

6) APPROPRIATENESS OF THE EXISTING DEVELOPMENT PLAN POLICY APPROACH FOR RETAIL AND LEISURE USES ACROSS THE BOROUGH

295. This section assesses the appropriateness of the existing development plan policy approach for retail and leisure uses across the Borough in order to inform emerging policies for the new Local Plan.

Centre Hierarchy, and Sequential and Impact Test

296. The Core Strategy policies on managing retail and leisure uses across the borough are reviewed in Section 2. The over-arching approach is summed up in Policy TC1 which seeks to direct new investment in for major new town centre uses (including retail, leisure, cultural, office etc) to the borough's existing hierarchy of centres. Policy TC1 requires the provision of new town centre uses to be directed to existing centres and in line with the centre hierarchy. This essentially supports the need for town centre proposals that are not within a defined centre to be subject to the sequential test. However, this needs to be

stated within Policy TC1. It is also noted that the Core Strategy has no provisions for testing the impact of proposed town centre uses that are not located within a defined centre. The only reference to a need to assess impact relates to proposals for new retail and leisure floorspace at North Greenwich.

297. Therefore, the new Local Plan should carry forward Policy TC1, but with a specific requirement for:
- Proposals for town centre uses that are not within a defined centre boundary to be subject to the sequential test; and
 - Proposals for retail and leisure uses (including hotels) to be subject to the impact test where they are not located within a defined centre boundary.
298. In respect to the impact test, a local threshold should be applied for triggering the need for an impact assessment rather than relying on the default threshold of 2,500 sqm gross stated in paragraph 94(b) of the NPPF.
299. Volume D sets out advice on a recommended impact threshold to be applied to proposals for retail and leisure proposals that are not located within a defined centre. The advice is based on a review of commercial outlets across the Borough's centres and out of centre locations, and evolving requirements for store sizes from retail and leisure operators
300. It is recommended that a floorspace threshold of 350 sqm gross is applied and written into the new Local Plan's policy for managing proposals for retail and leisure uses in edge and out of centre locations.

Policies for Existing and New Centres

301. The paragraphs below provide a review of current policies for individual centres along with suggested amendments to policies (where applicable):

Policy TC2 Woolwich Town Centre

302. The general approach to Policy TC2 is still relevant and needed to encourage development of new town centre uses, particularly if the ambitions to designate Woolwich as a Metropolitan Centre are to be realised. The policy states the need to improve comparison retail floorspace which would help to elevate the centre's profile as a shopping destination, albeit this will be challenging in the current climate (as comparison retail offer contracts in most centres). Other aspects of the policy, such as the promotion of new employment space and leisure and cultural uses will be vital in achieving the transformational change for Woolwich.

Policy TC3 Eltham Town Centre

303. The general objective of Policy TC3 is still relevant in that it encourages opportunities for new town centre uses and supports the delivery of the town centre masterplan. The only questionable element of the policy is whether the objective to increase comparison retail provision can be achieved given the structural changes in the retail market and the shift in customer habits to online shopping and larger shopping locations. However, the policy objective to improve

the quality of retail generally is a more realistic outcome, particularly if the masterplan is delivered. Similarly, opportunities to improve cultural and leisure provision is more relevant today and will help diversity Eltham's day and evening time economies.

Policy TC4 Greenwich District Centre

304. Policy TC4 supports the provision of additional retail floorspace and uses that encourage longer dwell time in the centre from visitors. Paragraph 4.3.28 of the Core Strategy acknowledges that the centre does not support many mainstream comparison retail brands, but that retail offer is compensated by a unique independent offer and the indoor market. This position remains unchanged and any potential for new retail will be led by independents and mid-market to premium high street brands seeking outlets in high footfall and visitor locations, such as Greenwich District Centre.

Policy TC5 North Greenwich District Centre

305. The intention of Policy TC5 was to guide new development at North Greenwich that would complement the then development of the O2 Arena and with the future intention of achieving district centre status within the centre hierarchy. This policy objective has largely been achieved through the development of the O2 Outlet Centre and adjoining leisure facilities, which have helped to create a major retail, leisure and cultural destination for Royal Greenwich. It is noted from paragraph 4.3.35 of the Local Plan that retail floorspace at North Greenwich should not exceed 50,000 sqm to ensure it is in keeping with the London Plan's threshold for district centre status and to ensure the centre does not compete with other existing centres. The health check assessment estimates that North Greenwich has circa 14,700 sqm (gross) of retail floorspace, most of which is comparison retail.
306. Given that the policy objectives have broadly been met for North Greenwich, the Council may wish to consider amending the policy to promote sustainable development at North Greenwich and to ensure that the centre's cultural and leisure value is maintained. This should be achieved through the continuation of leisure uses through appropriate and complementary development. Retail provision at the centre should be maintained and where it is expanded, it should be restricted to outlet format to limit competition for new investment in Woolwich.

Policy TC6 Other District Centres

307. The general approach to Policy TC6 remains relevant in its support for retail development of an appropriate scale for district centres' population and catchment, which is to ensure the vitality and viability of Woolwich is not harmed. This statement could be amended to state that new retail and leisure floorspace should not undermine the delivery of regeneration proposals in Woolwich. Specific references within the policy that seek to promote new comparison retail provision in Thamesmead, Blackheath and Lee Green may be difficult to achieve given that comparison retail in centres, particularly lower order centres, is contracting.

308. The Council may wish to consider a separate policy for Thamesmead District Centre given the potential to support a new DLR station and new development that will enable this potential investment.

Policy TC7 Local Centres and Neighbourhood Parades

309. The approach to supporting new retail and services at an appropriate scale to the local centres and neighbourhood parade, particularly in terms of meeting day to day retail and service needs. References to maintaining former A1 uses cannot be supported now that Use Class E is in place and should not be included in new policy. It is noted that the new local centre for Kidbrooke is expected to be delivered alongside new housing that is coming forward as of Berkley Group's Kidbrooke Village development. As such, policy should be amended to reference the ongoing development.

New Policy – Kidbrooke Local Centre

310. A policy for Kidbrooke Local Centre (also known as Kidbrooke Village) should seek to ensure that the provision of town centre uses reflects the scale and format of uses approved in the original planning consent. Proposals for new town centre uses are commensurate in scale and function of the local centre and its local catchment. This is to ensure that the local centre meets the local retail and service needs of the existing and future population.

New Policy – Out of Centre Retail and Leisure Provision at Charlton Riverside

311. A policy for the collective retail parks and standalone retail and leisure facilities within the Charlton Riverside area should be subject to development controls to limit the potential for the expansion of retail and leisure provision. Where proposals come forward to expand or amend planning conditions limit the type of retail use (e.g. in terms of goods for sale) and accommodation they should be subject to the sequential and impact tests. In addition, the policy could require proposals to demonstrate that proposals would not undermine future regeneration strategies for Woolwich Town Centre and/or the borough's other centres. Therefore, it is not advised that Charlton Riverside is classified as a centre in the hierarchy (Policy TC1).

Policies for Shopping Frontages/ Primary Shopping Areas and Hot Food Takeaways

Policy TC(a) Primary, Secondary and Local Shopping Frontages

312. There is no longer a requirement in the NPPF to identify shopping frontages. Policies that sought to protect the proportion of retail outlets along frontages can no longer be enforced due to the flexibility of commercial uses afforded by Use Class E. Therefore, while the Council can continue to identify shopping frontages they cannot be used to enforce policies that seek to maintain minimum frontages or floorspace for retail use or other commercial activity within Use Class E.

New Policy – Primary Shopping Areas

313. Policy TC(a) should be replaced with a policy that identifies Primary Shopping Areas for centres where primary and secondary shopping frontages are identified. These defined areas are required to inform the interpretation of the sequential test for new town centre uses that are located outside of a defined centre.

Policy TC(b) Non-retail Uses in Protected Shopping Frontages

314. The same issues raised on Policy TC(a) applies to Policy TC(b) due to the flexibility afforded by Use Class E, which means that thresholds for retail frontage cannot be enforced where changes in activity support another Use Class categories. However, the policy could be used to control activities outside of Class E, such as betting offices and drinking venues, which fall under Sui Generis.

Policy TC(c) Hot Food Take-aways

315. It is considered that Policy TC(c) is still relevant subject to amendments to the Use Class classification for hot food take-aways (now Sui Generis).
316. The principal of this policy is strengthened by paragraph 97 of the revised NPPF which allows the Council to control the introduction of new hot food takeaways in locations:
- “within walking distance of schools and other places where children and young people congregate”; and
 - “where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour”.

7) OTHER POLICY CONSIDERATIONS

317. The following policy recommendations may be considered to help strengthen the Borough’s main centres.

New Policy – Supporting the Evening and Night Time Economies

318. Policy should aim to support a vibrant, diverse *evening-time and night time economy in the Borough’s designated town and district centres. This should be framed around activities that contribute to the overall vitality and viability of the centres such as cultural, leisure, hospitality, and community uses that extend activity into the evening. However, policy should require proposals to demonstrate that evening and night time activities will not impact residential amenity or compromise the long term delivery of neighbouring sites. Mitigation measures that may need to be demonstrated as part of a planning application could include evidence on noise mitigation, monitoring and management of customers, safe transport access, and public-realm improvements (e.g to improve safety).
319. Overall, new or intensified evening-time uses should be supported only where they maintain good neighbourliness, contribute positively to centre vitality, and incorporate measures that protect residential amenity

New Policy – Supporting Meanwhile Uses

320. Policy should aim to support a vibrant, diverse *evening-time and night time economy in the Borough.
321. A new policy that supports temporary “meanwhile” uses* within Borough’s centres could help to bring vacant premises and sites back into productive activity. This in turn can support local entrepreneurship (particularly through low rents and flexible lease arrangements) and strengthen centre vitality. Such uses should be time-limited, well-managed, and compatible with surrounding activities, offering benefits such as enlivening the streetscape, providing community functions, or enabling small business growth. Policy should ensure that proposals for meanwhile uses are compatible with residential amenity and neighbouring uses. Where meanwhile uses are promoted as temporary uses to support longer term development sites, the proposals should demonstrate that spaces can be readily returned to their intended long-term use or redevelopment when required.

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