

**Draft Revised Lambeth Local Plan – Proposed  
Submission Version January 2020**

# **Topic Paper 4: Town Centres**

**May 2020**

  
**Lambeth**

## Contents

Contents.....	1
Executive summary .....	2
1. Future retail capacity in Lambeth .....	4
2. Town centre hierarchy.....	6
3. Town centre boundaries.....	13
4. Managing the mix of town centre uses.....	30
5. Betting shops and payday loan shops.....	43
6. Public houses.....	45
7. Hot food takeaways.....	48
Appendix 1: Data on evening and night-time economy uses in Brixton.....	54
Appendix 2 – Permitted development rights for evening and night-time economy uses.....	58

## **Executive summary**

This topic paper explains the rationale behind the proposed policy approaches for town centres in the Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020. For each policy area, the topic paper provides an overview of the policy context, the evidence base and feedback from the Issues consultation 2017 and the Draft Revised Lambeth Local Plan October 2018.

### Future retail capacity

Local Plans must demonstrate that a local planning authority is planning for a range of needs, including the need for additional retail floorspace. This section sets out the evidence base to support the identified need of 800m<sup>2</sup> of net additional comparison retail floorspace in Lambeth up to 2041.

### Town centre hierarchy

Local Plans must identify a network and hierarchy of town centres, within the context of the London Plan. This section summarises the justification for changes to Lambeth's town centre hierarchy. This includes the Waterloo and Vauxhall CAZ retail clusters, the Lower Marsh/The Cut/Leake Street Special Policy Area and a new local centre on King's Avenue.

### Town centre boundaries

Town centre boundaries should be kept up to date as part of a positive strategy for the future of each town centre. This section summarises the proposed changes to eight town centres: Brixton (major), Streatham (major), Clapham High Street (district), Stockwell (district), West Norwood/Tulse Hill (district), Kennington Park Road/Kennington Road (local), Loughborough Junction (local) and Vauxhall Street/Jonathan Street (local).

### Managing the mix of town centre uses

Local Plan policies should identify the range of uses permitted in town centres and primary shopping areas. This section sets out the justification for changes to policies that manage the mix of night-time economy uses in Brixton, including the introduction of the evening economy management zone, and retail uses in Streatham.

### Betting shops and payday loan shops

Due to an amendment to the Use Classes Order in 2015, betting shops and payday loan shops were removed from the A2 Use Class. They are now a sui generis use which means they do not fall within a particular use class. This gives local planning authorities more opportunity to appropriately manage these uses. This section sets out the policy approach to these uses to manage their negative impacts on town centres and health and wellbeing.

### Public houses

Over recent years many pubs in Lambeth have been lost to other uses, or have closed and are currently vacant. This section summarises changes to the Local Plan policy on public houses in response to changes to permitted development rights and the Draft London Plan.

### Hot food takeaways

Existing Local Plan policies manages the location of hot food takeaways near schools. This section summarises minor changes to the policies and summarises the updated evidence base.

## 1. Future retail capacity in Lambeth

- 1.1. Local Plans must demonstrate that a local planning authority is planning for a range of needs, including the need for additional retail floorspace. This section sets out the evidence to support the identified need for comparison retail floorspace in Lambeth.
- 1.2. The Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) sets out the need for an additional 800m<sup>2</sup> of net additional comparison floorspace up to 2041. This figure has been rounded up from the need identified in figure 98 of the GLA's Consumer Expenditure and Comparison Goods Floorspace Need in London (Experian, October 2017).

### Policy context

#### National Planning Policy Framework 2019

- 1.3. Paragraph 85 of the National Planning Policy Framework (NPPF) sets out that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (paragraph 85).
- 1.4. Planning Practice Guidance (PPG) states that local planning authorities should assess and plan to meet the needs of main town centre uses in full, adopting a 'town centre first' approach and taking account of specific town centre policy (Paragraph: 001 Reference ID: 2b-001-20140306).

#### London Plan

- 1.5. Policy E9 of the Draft London Plan Intend to Publish version December 2019 states that in development plans, boroughs should identify future requirements and locations for new retail development having regard to the town centre policies in the London Plan and strategic and local evidence of demand and supply.

### Evidence base

#### Consumer Expenditure and Comparison Goods Floorspace Need in London (Experian, October 2017)

- 1.6. The GLA commissioned evidence to identify the need for comparison retail floorspace to support the Draft London Plan. The study provides evidence of the likely future consumer expenditure in London and forecasts the need for comparison retail floorspace across London and within its individual centres. Comparison retailing is the provision of items not bought on a frequent basis. This includes clothing, footwear, household and recreational goods.

- 1.7. The study suggests that taking into account projected growth in household, commuter and tourist spending in London, retailers making more efficient use of space and special forms of trading, it is estimated that London could have a baseline need for additional comparison goods retailing of around 1.6 million square metres over the period 2016 – 2041 or 1.2 million square meters when current schemes in the planning pipeline are taken into account.
- 1.8. For Lambeth, the baseline scenario floorspace requirements 2015-2041 at the base level of productivity is 742m<sup>2</sup> net additional floorspace (figure 98 of Consumer Expenditure and Comparison Goods Floorspace Need in London, Experian October 2017). This figure is based on spend projections and does not take account of the existing pipeline of retail floorspace in the borough.

### Draft Revised Lambeth Local Plan October 2018

- 1.9. The requirement for 800m<sup>2</sup> of net additional comparison retail floorspace up to 2041 was consulted on in the Draft Revised Lambeth Local Plan. One respondent questioned whether the figure was too small and whether it was reliable up to 2041. However no changes have been made in the DRLLP PSV 2020 as a result of this comment as the need identified for Lambeth reflects the most up to date evidence for retail need for London.

## 2. Town centre hierarchy

- 2.1. This section summarises the justification for changes to Lambeth’s town centre hierarchy in Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020).
- 2.2. Lambeth’s existing town centre hierarchy consists of two major centres, seven district centres and 41 local centres. In the Lambeth Local Plan 2015, Lower Marsh/The Cut is designated as CAZ retail frontage and Vauxhall is designated as a district town centre. The DRLLP PSV 2020 proposes changes to designations in Waterloo and South Bank, a change in name to identify the Vauxhall CAZ retail cluster to be consistent with the Draft London Plan and a new local centre on King’s Avenue.

### Policy context

#### National Planning Policy Framework 2019

- 2.3. Local planning authorities are required by paragraph 85 of the National Planning Policy Framework (NPPF) to define a network and hierarchy of town centres and promote their long-term vitality and viability.

#### London Plan

- 2.4. In London, the London Plan is responsible for identifying the network of town centres down to the level of major centres. Policy SD8 of the Draft London Plan Intend to Publish version December 2019 classifies different types of town centre that comprise London’s town centre network according to the following hierarchy and definitions:

International centres - London’s globally-renowned retail and leisure destinations, providing a broad range of high-order comparison and specialist shopping, integrated into environments of the highest architectural quality and interspersed with internationally recognised leisure, culture, heritage and tourism destinations. These centres have excellent levels of public transport accessibility.

Metropolitan centres - serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.

Major centres - typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison

goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.

District centres - distributed more widely than Metropolitan and Major centres, providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.

CAZ retail clusters - significant mixed-use clusters located within the Central Activities Zone, with a predominant retail function and, in terms of scale, broadly comparable to Major or District centres.

Local and Neighbourhood Centres - typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. Together with District centres they can play a key role in addressing areas deficient in local retail and other services. This includes locally-identified CAZ retail centres.

- 2.5. The classification of international, metropolitan and major town centres can only be changed through the London Plan. The boundaries of these centres can be changed by boroughs in their Local Plans. Boroughs can also identify and change the boundaries of district, local and neighbourhood centres through their Local Plans.

### Waterloo and South Bank

- 2.6. Waterloo and South Bank is located in the Central Activities Zone (CAZ). In the Lambeth Local Plan 2015, Lower Marsh/The Cut is designated as a CAZ retail frontage.
- 2.7. CAZ retail frontages have been renamed CAZ retail clusters in the Draft London Plan. The DRLLP PSV 2020 proposes to expand the CAZ retail cluster and to identify the Lower Marsh/The Cut/Leake Street Special Policy Area within it (see map 4 of the Proposed Changes to the Policies Map January 2020).
- 2.8. The expansion of the Waterloo CAZ retail cluster recognises the existing and emerging quantum of retail in the area. The designation of the Special Policy Area acknowledges and protects the specialist character of Lower Marsh/The Cut/Leake Street and its role as a long-standing and unique cluster of smaller, independent retailers and food and drink uses, with associated street market and cultural uses such as the Old and Young Vic theatres. Proposals for further retail development within the wider CAZ retail cluster would need to



demonstrate they would complement and not undermine the special character of Lower Marsh/The Cut.

Draft Revised Lambeth Local Plan October 2018

- 2.9. The Draft Revised Lambeth Local Plan proposed Waterloo and South Bank as a metropolitan town centre, subject to being accepted by the Mayor in the Draft London Plan. This sought to recognise the role of the Waterloo and South Bank area in the London-wide town centre network.
- 2.10. Policy PN1(c) in the Draft Revised Lambeth Local Plan proposed that a metropolitan town centre designation would help enable Waterloo and South Bank to compete effectively and secure significant inward investment for the benefit of the local community. It also recognised the continued importance of Lower Marsh/The Cut for local needs and specialist independent retailing and proposed no change to its separate CAZ retail frontage ('cluster') status. The policy proposed to continue to require at least 50 per cent of original ground floor units in the primary shopping area of the Lower Marsh/The Cut CAZ frontage to be A1 retail use. It also proposed to resist the conversion of two or more retail premises into larger retail units in the Lower Marsh/The Cut CAZ frontage to help maintain a stock of premises appropriate for smaller and independent businesses.
- 2.11. 41 representations were received on the proposal to identify Waterloo and South Bank as a metropolitan town centre. Respondents who supported the proposal argued the designation would assist in the continued growth of the area while reinforcing the Opportunity Area status, it will ensure the continued importance of the area is fully recognised, assist in growing the area as a leading cultural centre and provide the opportunity for Waterloo Station to support a higher proportion of high-order comparison goods.
- 2.12. More than half of the representations objected to the metropolitan town centre. Reasons included the lack of evidence to justify the designation, the lack of retail floorspace in Waterloo and that Waterloo and South Bank is already overdeveloped and the proposed designation would damage the character and heritage of the area. Respondents also argued it would have a negative impact on the local community and services.
- 2.13. A number of comments recognised Waterloo as an area of residential and artistic diversity and suggested that this should be maintained and supported by the Local Plan. While it was recognised that the South Bank provides an important arts and cultural function in Lambeth, some concerns were raised in regards to the absence of a clear rationale for the re-designation, the inconsistency of the policy with evidence on retail capacity and that combined with affordable workspace requirements and proposed CIL charging schedule, the re-designation could deter or inhibit investment in the area.

- 2.14. The Mayor of London stated that he has no evidence that the area is functioning or has the potential to function as a Metropolitan Centre. The representation stated the council is welcome to include pro-active policies to encourage town centre uses in this area, in line with its designation as an Opportunity Area and Central Activities Zone (CAZ). However, the new town centre uses should not undermine the current function of Lower Marsh/ The Cut as a CAZ retail cluster that tends to function as a local centre and the arts, cultural and entertainment specialist cluster of the South Bank. In recognition of its CAZ location and function Lambeth may also wish to apply an appropriate CAZ designation for the Waterloo and South Bank area and to reflect its nature and the Council's vision for the area.

### London Plan Examination

- 2.15. Following consideration of the representations received during the consultation, the council submitted a representation to Draft London Plan Matter 88 as part of the Draft London Plan Examination in Public relating to the classification of Waterloo in the London Plan town centre hierarchy.
- 2.16. The representation argued that, in Lambeth's view, the Lower Marsh/The Cut retail cluster does not adequately reflect the scale of existing and emerging main town centre uses or Waterloo's potential for further investment and does not provide an effective means to plan for and monitor the centre going forward.
- 2.17. The representation argued for a larger Waterloo CAZ retail cluster to be identified in the Draft London Plan, to complement other Draft London Plan designations for the area and to allow for more effective local policy for Waterloo and the Southbank to come forward through Local Plan review.
- 2.18. The representation was supported by evidence which demonstrates that the Waterloo and South Bank area has experienced significant growth and investment since its identification as an Opportunity Area in 2007. It was identified at that time as having potential for 15,000 jobs and the DLP acknowledges that 9,000 of those jobs have already been delivered, with a residual target of 6,000 from 2016. This growth has been as a result of:
- a significant pipeline of new retail floorspace coming forward in Waterloo station, South Bank Place (the Shell Centre) and the Leake Street arches, adding to the existing, mainly independent comparison and convenience offer along Lower Marsh/the Cut.
  - a very significant and growing food and drink offer on the Southbank, within Waterloo Station (mezzanine and WIT) and along the York Road outer edge of the Station (emerging), adding to the extensive and very well-used food markets behind the Festival Hall and along Lower Marsh.

- a growing pipeline of office floorspace with much more potentially coming forward at Elizabeth House.
- a significant and growing stock of visitor accommodation (serving all income brackets) supporting Waterloo/Southbank and central London. Almost 70 per cent of all serviced rooms in Lambeth are in Bishops ward alone (i.e. Waterloo) – approximately 3,750 existing rooms in that ward and another 130 in the development pipeline at March 2018.

2.19. The representation acknowledged that through consideration of the various views expressed in representations received on the Draft Revised Lambeth Local Plan and options available through the Draft London Plan policies, the approach originally sought was no longer appropriate. The following was therefore suggested:

- Widen the extent of the CAZ retail cluster to include Lower Marsh/The Cut plus Waterloo Station, York Road (Southbank Place and Elizabeth House), Waterloo Road to the Imax roundabout, the south side of Belvedere Road and Westminster Bridge Road to the Addison Street roundabout. The Draft London Plan would therefore need to rename the CAZ retail cluster identified in Table A1.1 from 'Lower Marsh/The Cut' to 'Waterloo'.
- Within this larger CAZ retail cluster, Lambeth would identify Lower Marsh/The Cut (and the Leake Street arches) as a Special Policy Area in its Local Plan to acknowledge and protect its specialist character and role as a long-standing and unique cluster of smaller, independent retailers and food and drink uses, with associated street market and cultural uses such as the Old and Young Vic theatres. Proposals for further retail development within the wider CAZ retail cluster would need to demonstrate they would complement and not undermine the special character of Lower Marsh/The Cut. The council would work in partnership with the WeAreWaterloo Business Improvement District to achieve the objectives for this Special Policy Area.
- Both the Draft London Plan and the revised Lambeth Local Plan would continue to acknowledge the Strategic Cultural Area (arts, culture and entertainment specialist cluster) on the Southbank as separate but complementary to the retail cluster.
- Both documents would continue to acknowledge the separate but complementary healthcare specialist cluster, which should include St Thomas' Hospital and the adjacent Royal Street site. This area has some potential for a new, smaller scale retail and food and drink uses to support its primarily healthcare character and function.

- 2.20. Following Lambeth's representation, the Mayor of London proposed further suggested changes to the Draft London Plan Town Centre Network in response to Matter 88. This amendment included a further change to Annex 1 - Table A1.1 Town Centre Network to replace the centre identified as 'Lower Marsh/The Cut' with Waterloo as a whole. This further change was consistent with Lambeth's representation statement to Draft London Plan Matter 88 and was accepted by the Draft London Plan EiP panel in their report in October 2019. The DRLLP PSV 2020 position is therefore in general conformity with the Draft London Plan in this respect.

### Vauxhall

- 2.21. Vauxhall is located in the Central Activities Zone (CAZ). In the Lambeth Local Plan 2015, Vauxhall is designated as a new district centre, known as Vauxhall Cross to increase the vitality of the area and to form a growth pole in keeping with the CAZ designation.
- 2.22. In his response to the Draft Revised Lambeth Local Plan, the Mayor stated that the Local Plan should recognise that Vauxhall is proposed to be designated in the Draft New London Plan as a CAZ retail cluster and the retail function and potential of Vauxhall should be recognised in a way that reflects their location in the CAZ.
- 2.23. In response to this, the DRLLP PSV 2020 identifies Vauxhall as a CAZ retail cluster rather than a district centre.

### King's Avenue local centre

- 2.24. The DRLLP PSV 2020 proposes the designation of the new King's Avenue local centre (see map 3.10 of the Proposed Changes to the Policies Map January 2020). This designation is in response to the re-development of the Clapham Park Estate and the retail uses coming forward as part of this scheme. The designation of the new local centre will help support the delivery of the wider objectives of the Clapham Park Estate regeneration which includes more housing, more affordable housing, the reconfiguration of community services and facilities and improved place-making. The proposed local centre will be subject to the requirements of draft policy ED11 which seeks to ensure an appropriate mix of uses in the local centre. It is no longer proposed to de-designate the Poynders Road local centre.
- 2.25. An outline permission for the regeneration of Clapham Park Estate in 2008 (application reference number 06/03680/OUT) included the demolition of Poynders Road local centre and replacement of retail and restaurant floorspace on King's Avenue, Poynders Road and Streatham Place. Full planning permission for the redevelopment of Clapham Park Estate was granted (subject to s106 agreement) in March 2018 (application reference number 17/03733/FUL). This included 2,592m<sup>2</sup> of A1/A2/A3/A4/D1/D2/B1

floorspace to be located on King's Avenue. The planning permission applies planning conditions to ensure an appropriate mix of A2 uses and that at least 5 of the proposed 11 units are to be in A1 use.

- 2.26. During the Issues consultation in 2017, it was proposed to de-designate the Poynders Road local centre and replace it with a new local centre on King's Avenue. A total of five responses were received during the Issues consultation on the proposed de-designation. The comments raised concerns about the impact of the de-designation of Poynders Road local centre on those who are less able to travel due to the distance of the new local centre on King's Avenue. They also raised concerns about the loss of important local shops and services and that any changes would need to be supported by the implementation of safety pedestrian crossings.
- 2.27. The proposals for King's Avenue and Poynders Road local centres were consulted on in the Draft Revised Lambeth Local Plan in 2018. A total of three responses were received during the consultation. The respondents argued that the de-designation of Poynders Road local centre will make life more difficult for some residents and will result in the loss of important local centre. After full consideration of the feedback received during both rounds of public consultation, the DRLLP PSV 2020 no longer proposes to de-designate the Poynders Road local centre in response to the concerns expressed. This issue may be revisited in a future review of the Local Plan once the implementation of the Clapham Park masterplan is further advanced.

### 3. Town centre boundaries

3.1. This section summarises the proposed changes to eight town centre boundaries in Lambeth in the Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020):

- Brixton (major)
- Streatham (major)
- Clapham High Street (district)
- Stockwell (district)
- West Norwood/Tulse Hill (district)
- Kennington Park Road/Kennington Road (local)
- Loughborough Junction (local)
- Vauxhall Street/Jonathan Street (local)

#### Policy context

##### National Planning Policy Framework 2019

- 3.2. The council is required by paragraph 85 of the National Planning Policy Framework (NPPF) to define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.
- 3.3. The NPPF glossary defines a town centre as an area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
- 3.4. The NPPF glossary defines a primary shopping area as a defined area where retail development is concentrated.
- 3.5. The NPPF glossary defines main town centre uses as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

### London Plan

- 3.6. Policy SD7 of the Draft London Plan Intend to Publish version December 2019 states that boroughs should define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand and capacity assessments for town centre uses and housing.

### Partial de-designation of Brixton Major Centre and proposed changes to the Primary Shopping Area

- 3.7. The DRLLP PSV 2020 proposes changes to the boundary of the major town centre (see map 3.1 and Table 5 of the Proposed Changes to the Policies Map January 2020).
- 3.8. It is proposed to de-designate 42 Electric Lane from the town centre as it consists solely of residential units. It is also proposed to de-designate addresses on Brixton Road from the town centre as they also solely consist of residential units.
- 3.9. It is proposed to de-designate the railway arches on Brixton Station Road, Valentia Place, Ferndale Road and Nursery Road from the town centre. These arches currently accommodate a range of industrial and storage uses. The occupiers of these arches support a number of critical local functions in the street markets and town centre, including providing storage for the street market. They also provide workshop and studio space for creative enterprises which support the objectives of the Creative Enterprise Zone. These uses do not fall within the definition of main town centre uses.
- 3.10. It is proposed to de-designate the Ferndale Community Sports Centre from the town centre. This community facility is protected by Local Plan policy S1 and it is not necessary for this use to be included in the town centre.
- 3.11. It is proposed to de-designate addresses on Pope's Road and three railway arches on Brixton Station Road from the Primary Shopping area. These sites fall within a site allocation (16). Removing these addresses from the PSA will enable a wider range of uses to come forward at ground floor level. This area will remain in the town centre.
- 3.12. It is proposed to de-designate addresses from Gresham Road, Coal Lane and Valentia Place from the town centre. This completed scheme comprises residential with B1 floorspace only and neither of these uses need to be located within the town centre.

### Partial de-designation of Streatham Major Centre and proposed changes to Primary Shopping Areas

- 3.13. The DRLLP PSV 2020 proposes minor changes to the boundary of the major town centre (see map 3.2 and Table 5 of the Proposed Changes to the Policies Map January 2020). It proposes amendments to the boundary of the Streatham Central Primary Shopping Area and to reduce the extent of the Streatham Hill Primary Shopping Area. The proposed changes take account of the responses received during the Issues consultation in 2017, the Draft Revised Lambeth Local Plan consultation in 2018 and the draft Streatham Investment and Growth Strategy consultation in 2019.
- 3.14. During the Issues consultation stakeholders were asked for their views on how Streatham was performing and whether any changes were needed to the town centre boundary. 60 responses were received to this question. Generally respondents stated that the current retail offer needs to be improved, the centre lacks identity and public spaces and the High Road is not conducive to a successful town centre. However, there was no consensus on how the boundary of the town centre and primary shopping areas could be changed, as set out below. A fuller account of the consultation feedback on this issue is set out in the Lambeth Local Plan Review Issues Consultation Report October 2018.
- 3.15. A range of responses were received in relation to changes to the town centre boundary. These included:
- Streatham has multiple areas: Hill, Centre, Streatham and Streatham Vale.
  - The primary shopping area boundaries are fairly arbitrary and the current gap between the two primary shopping areas does not make sense.
  - The boundary should be split into two distinct areas, using Streatham and Streatham Hill stations as the centres for a concentration of shops and services.
  - The main commercial area to the south should be extended so it covers the roads near to Tesco.
  - The town centre should be shortened and expanded into the side roads.
  - There will always be two areas of concentrated activity in such a long high street.
  - It would be premature to decide on any de-designations whilst major developments at Streatham Hill and Streatham station are still being completed.
  - Streatham Common station and Greyhound Lane should form a local centre separate from the High Road.
- 3.16. A consultation workshop was also held in November 2017 in Streatham and included local ward councillors, the Business Improvement District and Streatham Action Group. Stakeholders were asked whether they thought the



boundaries of the town centre and primary shopping areas should be changed and how they should be changed. Stakeholders gave a range of suggestions:

- The town centre boundary should reflect the boundary of the Business Improvement District.
- The primary shopping area could cover the whole of the town centre to support retail.
- Retail to the south of the boundary, including Greyhound Lane, should be protected.
- The area between the two primary shopping areas needs to be looked at.
- The town centre is very long and stretched out – it is not clear what the advantages of extending the town centre would be.
- The retail units on Ambleside Avenue could be included in the town centre.
- ‘Junk’ shops are concentrating in the primary shopping areas and around St Leonard’s junction.
- There are particular issues in Gleneagle Road and the Dip, including lots of vacant units, the presence of minicab businesses, the subdivision of units without consent and too many coffee shops and restaurants replacing independent shops.

3.17. Due to the wide range of views on the most appropriate approach to the town centre and primary shopping area boundaries, no changes to the boundaries for Streatham town centre were proposed in the Draft Revised Lambeth Local Plan October 2018. Instead further analysis was commissioned through the Streatham Investment and Growth Strategy, as explained below.

#### Streatham Investment and Growth Strategy 2019 – 2030

3.18. A masterplan for Streatham was produced in 2009. Since then, Streatham has experienced significant change and development. To build upon previous investment in the area, the council commissioned a Streatham Investment and Growth Strategy in March 2017.

3.19. The purpose of the strategy is to provide a coherent vision and set of objectives which support a collaborative approach to securing investment, growth and prosperity. The overall vision for Streatham is to “become a better and fairer place. It will attract significant new investment and development which will continue to improve and diversify the town centre. It will celebrate its unique identity, in a way that galvanises the local community to take action and pride in their town centre.” The five objectives are:

- Challenging perceptions and attracting inward investment
- Diversifying the town centre offer
- Providing space for growth and enterprise
- Providing spaces for better and new experiences
- Progressing development opportunities

3.20. The draft strategy identified that the town centre is performing well when assessed against some town centre performance criteria:

- Representation from the food and beverage sector is increasing.
- Retail offer benefits from a reasonable split between national/multiple and independent retailers.
- Some evidence of more specialist/independent retailers opening in the centre but this hasn't come at the expense of the ability of the centre to meet day-to-day shopping needs.
- Vacancy rate is below the UK average and has decreased in recent years.
- Some evidence of positive investment in the centre through the opening of new businesses, investment from national retailers and the opening of cultural spaces.
- Town centre benefits from a proactive Business Improvement District.

3.21. The draft strategy identified that there remains scope for Streatham to further improve its performance, particularly in terms of the amount of spend it captures from the local area. Particular issues include:

- Streatham should be enabled to better respond to its changing demographic profile and needs to capture a greater proportion of the retail and food/drink spend currently being spent in nearby locations such as Brixton, Balham and Tooting.
- Streatham lacks an 'anchor' retailer which would help to drive footfall and pull in spend from an area beyond Streatham's immediate local catchment and it has a retail offer that caters towards day-to-day shopping needs only - the planned development of Westfield Croydon will put further pressure on Streatham's ability to retain non-food shopping spend.
- There is an opportunity to attract additional cultural and leisure uses (e.g. an independent cinema operator).

3.22. In response, the draft strategy identified short term, medium term and long term priority actions to ensure Streatham adapts to macro-economic trends, reflects the needs and requirements of its changing demographic and continues to improve. The draft strategy identifies one objective as needing to diversify and strengthen the town centre offering to attract people from further afield, adapt to rapidly changing retail trends and build resilience in the town centre by supporting existing local businesses. In order to deliver this objective it recommends the following priority action for planning:

- Drawing on the evidence presented as part of this work, the council should use the Local Plan review to define a clear planning strategy for Streatham town centre and planning actions should include:

- Reduce the extent of the Primary Shopping Area in Streatham Hill to encourage a broader mix of uses whilst maintaining a core of retail.
- Review the Town Centre boundary to ensure its extent is fit for purpose and provides enough flexibility for development around its edges.
- Continue to define a Primary Shopping Area in Streatham Central to protect the core retail function but review whether the minimum A1 threshold is appropriate.
- Develop policies that support the amalgamation of retail units within Streatham Central Primary Shopping Area in order to protect the core retail function of this area and encourage additional multiple/higher profile retail operators to the centre.

3.23. The draft strategy set out the following rationale for reducing the extent of the Streatham Hill Primary Shopping Area to help diversify the local offer and build on the non-retail assets in the area:

- Macro-economic conditions are making traditional A1 retail less viable and flexibility is required to ensure areas remain vibrant.
- Town centres need to diversify and have a more experimental offering to attract consumers to use them – a rigid policy focus on A1 does not actively support this.
- Flexibility should encourage other businesses to locate in the area (assuming they have active frontages) which should help to drive footfall (e.g. gyms, food and beverage and workspace).
- It will help to free up key development sites, including around Streatham Hill station, which could support residential and commercial growth.
- There are a few larger A1 units which make a significant economic contribution to the local area. These should be retained within a smaller Primary Shopping Area boundary.

3.24. Based on the recommendations set out in the draft strategy, a detailed review of the town centre boundary and a review of the two primary shopping area boundaries was undertaken. The review sought to ensure that the current town centre boundary was fit for purpose and would deliver retail and other active frontages in appropriate locations. It also sought to ensure that the boundary of the Streatham Hill primary shopping area supports a broader mix of uses whilst also protecting a core amount of retail and local services.

3.25. The proposed changes were consulted on alongside the draft strategy from 27 June to 23 August 2019 to ensure stakeholders were given the opportunity to comment on the proposed changes and would inform whether the proposed changes were carried forward as part of the DRLLP PSV 2020. The Streatham Investment and Growth Strategy was agreed by the Cabinet Member for Planning, Investment and New Homes in December 2019. A summary of the responses on the proposed town centre boundary changes

and the proposed changes to the primary shopping areas is set out below. The full analysis and response to each of the comments received on the draft Streatham Investment and Growth Strategy is set out in [Appendix 4](#) to the Cabinet Member decision.

### Major town centre boundary

- 3.26. The review of the town centre boundary identified 12 areas proposed to be de-designated from the town centre boundary.
- 3.27. The following areas were proposed to be de-designated from the town centre boundary because they are generally backland areas or sites which mean they do not need to be included in the town centre boundary and are not considered appropriate locations for retail or active frontage uses:
- Rear of 47 to 47B Streatham Hill
  - 3 Barrhill Road, Citizens Advice Bureau Barrhill Road
  - 2, 4 and Rear of 2 To 4 Mount Ephraim Road
  - Car park to the rear of the Horse and Groom, 60 Streatham High Road
  - London Borough of Lambeth Depot, Leigham Court Road
- 3.28. The following areas were proposed to be de-designated from the town centre boundary because they are wholly residential uses with no element of main town centre use
- 51, 53, 55, 57, 59, 61, 63, 65, 67, 69, 71, 73 Blairderry Road
  - 1, 2, 3, 4, 5, 6, 7, 8 Ardwell Road
  - 1, 2, 3, 4, 5, 6 Gaumont Place
  - The Cottage Broadlands Mansions, Broadlands Avenue
  - 1-14 Chalcot Mews
  - 1-15 Raebarn Court, Gracefield Gardens
  - 1-8 Nicholls Mews
  - 7, 9 to 11 Gleneldon Road
  - Hopton House, 243A Streatham High Road
  - 5 Hopton Road
- 3.29. It was also proposed to de-designate Gleneldon Mews from the town centre boundary. This would include the following addresses:
- 1, 2, 3, 4, 5-7, 8, 10, 11, 12-14, 15, 16, 17-18, 19, 20, 21 Gleneldon Mews
- 3.30. This was in response to objective 4 of the draft strategy – providing spaces for better and new experiences. The strategy identified that over the medium-term there is an opportunity to create a development and management plan for Gleneldon Mews. It recognises that Gleneldon Mews is home to a range of

businesses, artisans and light industrial units in B1c use and the unique character of the mews along with the size and style of units make it an important and characterful part of Streatham. The area has the potential to become home to a cluster of creative businesses and there is a need to safeguard existing uses and encourage more B1c uses. The de-designation of Gleneldon Mews from the town centre boundary ensures greater protection for B1c uses as active frontages will no longer be required should a site come forward for redevelopment.

3.31. During the consultation on the draft strategy stakeholders were asked to what extent they agreed or disagreed with the proposed town centre boundary amendments. 78 responses were received. 45 per cent of respondents strongly agreed or agreed with the amendments. 27 per cent of respondents neither agreed nor disagreed and 24 per cent of respondents disagreed. 4 per cent said they don't know.

3.32. 39 of the respondents provided specific comments:

- Two respondents supported the proposed changes.
- One respondent supported the de-designation of Gleneldon Mews and parade of shops opposite Streatham Station.
- Four respondents stated the current boundaries work.
- Two respondents stated the focus should be making improvements to the existing centre, including making it more attractive.
- One respondent argued that changes are reducing the area the council has to care about.
- Eight respondents questioned what the proposed changes would mean for existing businesses and were concerned that existing businesses would be lost/closed.
- Three respondents argued that the proposed changes have not been adequately explained, nor what the impacts would be.
- One respondent argued the area on the border with Norbury is ignored.
- Three respondents queried how Streatham Vale/Streatham Common fit into the proposals.
- One respondent argued that Streatham Central should be prioritised over Streatham Hill as there is currently an imbalance of investment.
- One respondent questioned why the High (east of the High Road opposite Kingscourt) is not included in the primary shopping area. Another respondent argued that this area should not be de-designated as it is obviously a continuation of a town centre shopping parade.
- One respondent argued the case has not been made for removing protection for current employment generating uses at the ASC studios and the east side of Gleneldon Mews – if the council believes these uses can be protected by other means this should be articulated more clearly. They argued that the removal of Leigham Court Road shoppers car park is an indication the council may be removing support for short term car parking

in the town centre – there is still some demand for car parking. They also argued that there is the opportunity for commercial development on the car park site behind the Horse and Groom pub rather than allowing it go to residential.

3.33. Respondents also provided comments on specific areas in the town centre, particularly Streatham Hill:

- There is a range of important local services/shops that are not included in the primary shopping area – the proposal would give more protection to multi-chain national stores as opposed to local retail services.
- The primary shopping area should be a larger area because recent investment needs to be supported by a larger primary shopping area in order to create a destination for people to go shopping.
- The reduction in retail is not supported if it results in more residential.
- One respondent supported the changes if it will result in more bars, restaurants and experiences.
- The precise boundary for the new western edge of the town centre and the protected retail area in the new London Square development should be checked as it does not agree to the full extent of ground floor and basement retail and servicing space rather than to block outline of the residential development above it (Gaumont Place).
- There is huge potential with M&S and Streatham Theatre but there are still vacant units.

3.34. In light of the consultation responses received on the proposed changes to the town centre, it is proposed to continue with the changes to ensure the town centre boundary is fit for purpose and to remove areas that are not considered appropriate for town centre uses and active frontages. It is also proposed to make one additional minor amendment to remove 1-15 Raeburn Court, Gracefield Gardens from the town centre for consistency with other boundary changes.

#### Streatham Hill Primary Shopping Area

3.35. A review of the boundary of the Streatham Hill Primary Shopping Area looked at the current mix of uses in the primary shopping area and whether there was scope to reduce its extent to support a greater diversity of uses whilst also maintaining a retail core to protect retail and other local services. This was in response to the recommendations in the draft Investment and Growth Strategy to reduce the extent of the Primary Shopping Area in Streatham Hill to encourage a broader mix of uses whilst maintaining a core of retail.

3.36. This analysis resulted in the proposal to remove the following addresses from the primary shopping area (see map 3.3 of the Proposed Changes to the

Policies Map). The proposed changes underwent public consultation alongside the draft Investment and Growth Strategy:

- 49, 51, 53A, 55, Rear of 55, 57-59, 61A, 63, 65, 67, 69A, 71, 73, 75, 77, 79-81, 83, 85, 87 Streatham Hill
- 105, 107, 109, 111, 113-117 Streatham Hill
- 110, 114, 118, 120, 122, 124, 128, 130, 132, 134, 136-138, Streatham Hill
- Café Streatham Hill Rail Station, Streatham Hill Rail Station
- 1A, 1B Cricklade Avenue,
- 1, 3, 5, 7, 9,10, 11, 13-15, 17-21, 23-27, 29 Sternhold Avenue
- Shop adjacent to Streatham Hill Station Corener of Drewstead Road and Streatham High Road
- 1-3, 5-5A, 7-7A, 9, 9A, 11, 11A, 13-15, 17, 19, 21, 23, 25, 27, 29, 31, 33, Leigham Court Road
- 2, 2-4, 6 Leigham Court Road
- 1-2, 3, 5-6 Dorchester Parade, Leigham Court Road
- 1, 2, 3, 4, 5-7, 8-9, 10, 11, 12, 13, 14, 15 Streatleigh Parade, Streatham High Road
- 2, 2A 4, 6, 10-12, 14, 16, 20, 22, 24, 26, 28, 30, 32, 34-36 Streatham High Road
- 1 Drewstead Road
- 5, 7A, 7B Streatham High Road
- 53, 61, 69 Streatham Hill
- 112, 126, 140 Streatham Hill
- 4, Leigham Court Road
- 5 Dorchester Parade, Leigham Court Road
- 1-63 Streatleigh Court, Streatham High Road
- 1-62 Picture House, 7 Streatham High Road

3.37. During the consultation on the draft strategy stakeholders were asked to what extent they agreed or disagreed with the proposal to reduce the Streatham Hill Primary Shopping Area. 79 responses were received. 37 per cent of respondents strongly agreed or agreed with the proposal. 14 per cent of respondents disagreed or strongly disagreed with the proposal and 23 per cent said they don't know. 21 respondents provided comments:

- Three respondents questioned what the changes mean in practice and stated it is unclear what problem is trying to be addressed – one of these respondents suggested the focus should be supporting the area to become an eating destination and another argued that mixed spaces are important but retail outside of the PSA shouldn't be prohibited.
- One respondent was broadly in agreement in order to reflect the commercial reality but need to ensure the boundary of the site under Gaumont Square is accurately defined and clear statement was needed on how applications for take-aways will be dealt with.

- One respondent objected to the proposed changes, arguing the current boundary provides good mix of retail, restaurants, cafes and bars and they don't want to see more restaurants, cafes and bars.
- One respondent commented that the Megabowl development still has vacant units as it is unattractive/too expensive compared to other areas in Streatham.
- One respondent stated that the proposed changes have not been fully explained but the PSA needs to be retained to accommodate the extra footfall that was result from the re-use of the former Streatham Hill theatre. Another respondent stated the area around the former theatre doesn't function as a PSA but policy should support bringing the venue back into use and could encourage other cultural/leisure uses.
- Two respondents argued that the reduction of the PSA will mean it is unviable and the reduced area will become run down very quickly – the area should be promoted instead.
- Two respondents supported the proposal as it could potentially enhance the shopping experience.
- One respondent stated the council needs to ensure the ASC studios are retained so they do not change to residential.
- One respondent questioned whether there has been specific request for the changes from landlords/occupiers.
- One respondent objected to the reduction in retail and the increase in residential whilst another argued that the proposed changes would give greater protection to the newer retail units than more established businesses that are important to the local community.

3.38. It is proposed to continue with the proposed changes to consolidate the primary shopping area at Streatham Hill. The proposals align with the aspirations of the Streatham Investment and Growth Strategy to diversify the uses in this part of the town centre whilst also maintaining retail core to provide services for local residents. The retail offer in the proposed primary shopping area will be protected through PN4b) (see section 4).

#### Streatham Central Primary Shopping Area

3.39. The review of Streatham Central Primary Shopping Area identified a limited number of areas proposed to be de-designated from the primary shopping area. They would remain within the town centre boundary.

3.40. The following units were proposed to be de-designated from the primary shopping area as they were not found to be performing a primary retail function due to the current mix of uses in this area (see map 3.4 of the Proposed Changes to the Policies Map January 2020). The de-designation of these units would also help consolidate the rest of the primary shopping area on Streatham High Road:



- 2-8 Gracefield Gardens
- 1-7 Sunnyhill Road
- 9-15, 15 Sunnyhill Road
- 2, 2A, 4, 6, 8-10, 10A, 18 Sunnyhill Road
- 2B, 2C, 4A, 6A, 8-10, 10A,12, 12A, 14, 14A, 16, 16A,16B, 18,18A, 20 Sunnyhill Road
- 1, 3, 4, 5, 7, 8, 9, 11, 13, 19, 23, 25, 25A Shrubbery Road
- 6, 8, 10, 13A, 13B, 15A, 15B, 15C, 15D, 17, 17A, 17B, 17C, 21A, 21B, 21C, 21D, 27 Shrubbery Road

3.41. The following unit was proposed to be de-designated from the primary shopping area as it is a community use that does not provide a primary retail function:

- 2-8 Gracefield Gardens

3.42. The following comments were provided on the proposals for the Streatham Central Primary Shopping Area:

- One respondent suggested it is unfair to not protect Streatham Hill but to leave Streatham untouched. Another respondent argued there is unfair bias towards Streatham over Streatham Hill.
- One respondent stated the question is factually inaccurate and people are being partially misled as there are proposed changes at Sunnyhill Road/Shrubbery Road – the shopping facilities along Sunnyhill and Shrubbery Road should be protected.
- One respondent supported the proposal to give greater focus to the southern part of the high street but felt this should not detract from the northern part of the high street which is changing rapidly and has potential to unlock Streatham as a place to spend time in its own right.
- One respondent argued the council needs to develop a Streatham urban fringe strategy for the areas that are not in the town centre which could include the area south of the Common. These areas have the potential to support uses such as artist studios, services and restaurants.
- One respondent stated they would encourage good quality restaurants (not chains) and bars around Streatham Hill station.

3.43. It is proposed to continue with the proposed changes to de-designate parts of Streatham Central primary shopping area. The proposed changes will ensure that the primary shopping area and retail uses are focussed on Streatham High Road. The areas proposed to be de-designated will remain in the town centre where town centre uses, including retail, will be supported.

### Partial de-designation of Clapham High Street District Centre

- 3.44. The DRLLP PSV 2020 proposes to de-designate several areas from the district centre (see map 3.5 and Table 5 of the Proposed Changes to the Policies Map January 2020).
- 3.45. It is proposed to de-designate 11-13 Edgeley Road from the town centre because the current use as a religious centre is not a main town centre use and does not need to be within the town centre boundary. In addition, Edgeley Road is not considered an appropriate location for a ground floor active frontage should this site be redeveloped as it is a residential street.
- 3.46. The partial de-designation was consulted on in the Draft Revised Lambeth Local Plan 2018 and no comments were received.
- 3.47. It is proposed to de-designate addresses on North Street, Old Town and Stonhouse Street as these addresses comprise residential units only with no element of town centre use.
- 3.48. The Baby Room Nursery at 18 Old Town is also proposed to be de-designated from the town centre. This community facility is not a main town centre use and is already protected by Local Plan policy S1.
- 3.49. It is proposed to include 2,4,6, 8 and 10 Voltaire Road to the district centre as the arches contain main town centre uses and function as part of Clapham District Centre.

### Extension to Stockwell District Centre

- 3.50. The DRLLP PSV 2020 proposes a minor extension to the boundary of the Stockwell district centre to include 13-15 Stockwell Road (see map 3.6 and Table 5 of the Proposed Changes to the Policies Map January 2020). This address comprises office space, including at ground floor level. Offices are a main town centre use therefore it is appropriate for this address to be included in the district centre.

### Partial de-designation of West Norwood District Centre

- 3.51. The DRLLP PSV 2020 proposes the partial de-designation of the West Norwood District Centre (see map 3.7 and Table 5 of the Proposed Changes to the Policies Map January 2020).
- 3.52. It is proposed to de-designate the southern part of West Norwood High Street to the south of the railway line, down to Rothschild Road from the boundary of West Norwood District Centre. This area is outside of the Primary Shopping Area. It is proposed to re-designate this area as the West Norwood Creative Business Cluster (see Topic Paper 3: Workspace). No changes are proposed to the existing local centre at Norwood High Street/Chapel Road.

- 3.53. The proposal to de-designate this part of the district centre was first consulted on during the Issues consultation. The West Norwood and Tulse Hill Manual for Delivery 2017 was produced by the council working with the local community and businesses, intended to guide positive change in the area. It includes evidence and a vision for the evolution of the local economy, as well as some recommendations for policy approaches. This study found that the overall offer for Norwood High Street is limited and in recent years has been performing relatively weakly. It noted high vacancy levels (nearly a third of all floorspace, compared to 10 per cent across the town centre as a whole) and the fragmentation of the retail frontage. It also found that this part of the town centre experiences comparatively low footfall levels, which has impacted levels of demand and vitality. In the context of changing shopping habits and shrinking demand for retail floorspace, it was considered more appropriate to direct town centre uses north of the railway line, to consolidate and reinforce the central part of West Norwood town centre.
- 3.54. The Manual for Delivery recommended that the Norwood High Street part of West Norwood has the potential to become South London's Creative Enterprise Zone: a prominent hub for a range of creative activities and industry, providing jobs for local residents, helping to enhance the area's identity, and improving links to the wider community. To achieve this, it would be necessary to encourage a more diverse mix of spaces and activities and the de-designation of this section of Norwood High Street from the town centre would provide more flexibility at ground floor level for different uses to emerge, including potential provision of new live-work space that could help seed creative and artistic activity. This would complement and work alongside the adjacent Key Industrial and Business Area.
- 3.55. Five responses on the proposal were received during the Issues consultation in 2017. Some respondents supported the proposal as long as it did not negatively affect residents through increased traffic and welcomed measures to improve this part of the town centre. Other respondents questioned whether the proposal was a good idea given that the new cinema and theatre would encourage more activity along Norwood High Street and argued that the council should do more to encourage a diversity of uses in this area.
- 3.56. The Draft New London Plan was published in December 2017 and included policy HC5 which encouraged boroughs to identify Creative Enterprise Zones. Taking account of the Issues consultation responses and London Plan policy HC5, the Draft Revised Lambeth Local Plan October 2018 proposed to continue with the partial de-designation of the district centre and to re-designate the area as a Creative Enterprise Zone. Further information about the proposed designation of the Creative Enterprise Zone in the Draft Revised Lambeth Local Plan can be found in Topic Paper 3: Workspace.

- 3.57. The comments received on the proposal to de-designate the town centre and to re-designate it as a Creative Enterprise Zone in the Draft Revised Lambeth Local Plan October 2018 are set out in Topic Paper 3: Workspace. The majority of the comments raised concerns with the proposal for a CEZ rather than the de-designation of the town centre. In light of these comments, no changes have been made to the proposed de-designation of the Norwood High Street in the DRLLP PSV 2020.
- 3.58. The DRLLP PSV 2020 proposes to de-designate addresses on Norwood Road, Chatsworth Way and Hannen Street from the town centre (see map 3.7 and Table 5 of the Proposed Changes to the Policies Map January 2020). These addresses comprise residential properties only with no element of town centre use.
- 3.59. The DRLLP PSV 2020 proposes to amend the boundary of the Primary Shopping Area at site 18, so only the frontage of the site along the High Street falls within the PSA (see map 3.8 and Table 5 of the Proposed Changes to the Policies Map January 2020). The remainder of site 18 would remain within the town centre, but would no longer be required through policy to provide A1 retail floorspace at ground floor level. The retail element of any development proposal at site 18 would then be focussed on the High Street frontage only, to contribute towards the consolidation and regeneration of the town centre.

### Partial de-designation of Kennington Park Road/ Kennington Road Local Centre

- 3.60. The Submission Version Draft Revised Lambeth Local Plan proposes the partial de-designation of the Kennington Park Road/Kennington Road local centre (see map 3.9 and Table 5 of the Proposed Changes to the Policies Map January 2020). The proposal resolves the issue of the over-lap of the Stannary Street Key Industrial Business Area (KIBA) with part of the local centre to the north of Kennington Road which results in a conflict between the two designations. In addition, the ground floor uses at the far northern end of the local centre are residential rather than retail, which means the local centre designation is no longer appropriate.
- 3.61. The area proposed to be de-designated from the local centre will remain within the Stannary Street KIBA and so will be subject to the requirements of Local Plan policy ED1 which seeks to protect industrial and business uses.
- 3.62. The partial de-designation was consulted on during the Issues consultation in 2017. Two comments were received: one respondent raised no objection to the proposal whilst the other argued that the builder's merchant on Kennington Park Road is more retail than employment in nature and should remain in the town centre. No changes were proposed in response to the

Issues consultation responses as the retail element of unit referred to remains in the town centre.

- 3.63. The proposed change was carried forward in the Draft Revised Lambeth Local Plan October 2018. No comments were received on this proposal during that consultation.

### Extension to Loughborough Junction Local Centre

- 3.64. The DRLLP PSV 2020 proposes to extend the boundary of the local centre (see map 3.11 and Table 5 of the Proposed Changes to the Policies Map January 2020). The proposal will ensure a more coherent town centre which will have two continuous frontages on either side of Coldharbour Lane. It will also ensure that the whole of the Tesco store at 242-248 Coldharbour lane is included in the local centre. The area proposed to be added to the local centre will be subject to the requirements of policy ED11 which seeks to ensure an appropriate mix of uses in the local centre.
- 3.65. A specific policy approach to Rathgar Road is set out in draft policy PN10, which acknowledges the opportunity to comprehensively refurbish and convert the railway arches and associated public realm to achieve a mix of space for small businesses.
- 3.66. An extension to the Loughborough Junction local centre was proposed during the Issues consultation. The proposal was to extend the boundary of Loughborough Junction local centre to include part of Rathgar Road and southern parts of Coldharbour Lane.
- 3.67. The rationale for the extension to the south of Coldharbour Lane was to help make the centre more coherent, with a continuous shopping frontage on both sides of the road. The proposed inclusion of Rathgar Road was in response to the emerging draft Loughborough Junction masterplan. Rathgar Road was identified as having the potential for a small cluster of food and drink uses that would be positioned away from the noise and pollution of Coldharbour Lane. It was also considered that the introduction of more active uses along Rathgar Road could potentially support the aspiration of creating a new route through one of the vacant arches linking the Loughborough Estate to the rail station.
- 3.68. A total of 11 comments were received on the proposed extension to the Loughborough Junction local centre. Concerns were raised about whether the introduction of new uses in Rathgar Road would lead to too many night-time economy uses and whether existing businesses would be displaced. Other responses supported the proposal, arguing that the area needs more shops and will support new routes in the area.
- 3.69. Following consideration of the responses received during the Issues consultation, the proposal to extend the local centre to include Rathgar Road

was not included in the Draft Revised Lambeth Local Plan. It was considered that, although there had been aspirations to increase the retail and food and drink offer in the local centre, given the current vacancy rates in the local centre, an extension to the local centre may further dilute the existing retail offer. There were also concerns that some of the existing businesses could be displaced because the range of uses that would be permitted in the town centre are more limited.

- 3.70. Policy PN10 of the Draft Revised Lambeth Local Plan instead proposed a specific policy approach to Rathgar Road that acknowledged the opportunity to comprehensively refurbish and convert the railway arches and associated public realm to achieve a mix of space for small businesses. This would include a wider range of uses than a town centre designation could allow including B1 workspace and maker space, community facilities and café and restaurants that complement the local centre. No fewer than six railway arches could be in B/D class use and no more than 6 railway arches could be in A class use and it would need to demonstrate that the A class uses would complement the existing local centre and that they could not be provided within existing vacant premises in the local centre. The draft policy also set out a range of other considerations should such a comprehensive proposal come forward.
- 3.71. The Draft Revised Lambeth Local Plan proposed to continue with the other proposed extension to the south of Coldharbour Lane but this extension was expanded to include a continuous frontage up to Padfield Road. This would help make the centre more coherent with a continuous shopping frontage on both sides of the road.
- 3.72. Two responses were received during the Draft Revised Lambeth Local Plan consultation on the proposed local centre extension. Both respondents supported the proposal to extend the local centre on Coldharbour Lane but one requested asked that LJ Works is removed from KIBA and included in the town centre. No changes to the local centre boundary have been made as a result of these comments as no changes are proposed to the KIBA and it would result in non-compliant uses in the KIBA.

### Vauxhall Street/Jonathan Street Local Centre

- 3.73. The DRLLP PSV 2020 proposes the partial de-designation of the Vauxhall Street/Jonathan Street local centre. It is proposed to de-designate all addresses at 16 Vauxhall Street as these addresses accommodate residential units only (see map 3.12 and Table 5 of the Proposed Changes to the Policies Map January 2020).

## 4. Managing the mix of town centre uses

- 4.1. This section sets out the justification for proposed changes to policies PN3 Brixton and PN4 Streatham in relation to the management of uses in the Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020).

### Brixton evening and night-time economy uses

- 4.2. This section sets out the justification for the proposed changes to policy PN3 Brixton in relation to the management of mix of uses in Brixton major town centre.
- 4.3. Evening and night-time economy uses are currently managed through policy ED7 of the Lambeth Local Plan 2015. The policy seeks to support the evening economy whilst also making sure that any adverse impact on local amenity is minimised. It requires an assessment on whether food and drink uses will cause unacceptable harm to community safety or the amenity of neighbouring residential areas.
- 4.4. PN3 of the Local Plan 2015 limits food and drink units in the primary shopping area to 25 per cent of units and prevents no more than 2 in 5 consecutive ground floor units in food and drink use at one time. In the indoor markets, the policy states that no more than 50 per cent of ground floor units should be in A3 within each indoor market (Brixton Village, Market Row and Reliance Arcade). The policy has no restrictions on evening and night time economy uses outside of the primary shopping area and the indoor markets.
- 4.5. In 2017, a number of local residents' groups raised concerns with the council about the impact of Brixton's growing evening economy on local residents and the environment. In response to these concerns the council began to look at appropriate measures to support the growth of the evening economy whilst also managing any negative impacts. This included looking at how planning policies and licensing arrangements could work together to better manage the mix of uses in the town centre. This work identified where concentrations of evening economy uses have established over time and looked at the potential of planning policies to manage these uses and to support diversification in the evening and night-time economy.
- 4.6. The Mayor states that the night-time economy refers to all economic activity taking place between the hours of 6pm and 6am, and includes evening uses.
- 4.7. For the purposes of this policy, A3, A4 and A5 uses are considered to be evening and night-time economy uses.

- A3 uses – defined as “restaurants and cafés” - for the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.
- A4 uses – defined as ‘drinking establishments’ - public houses, wine bars or other drinking establishments (but not night clubs)
- A5 uses – defined as ‘hot food takeaways’ - for the sale of hot food for consumption off the premises.

4.8. Sui generis uses are those which do not fall within a specified use class. Nightclubs are a sui generis use that, for the purposes of the policy, is considered an evening and night-time economy use.

#### Issues consultation

4.9. To better understand views on Lambeth’s evening and night-time economy, the Issues consultation 2017 asked stakeholders whether they agreed or disagreed that nightclubs make a positive contribution to culture and the night-time economy. 58% of respondents either strongly agreed or agreed that they do make a positive contribution. Many respondents who thought that they make a positive contribution to culture and the economy also said they should be carefully managed to limit the impact on local residents through noise, litter and anti-social behaviour and should only be located in certain locations, such as town centres and where there is good public transport.

4.10. 40 stakeholders provided specific comments in relation to Brixton’s night-time economy. These covered a range of issues, some of which cannot be dealt with through the planning system. In terms of planning, stakeholders raised the following issues:

- The definition of Brixton town centre is out of date and does not include key areas such as Brixton Village, Market Row, Coldharbour Lane and Pope’s Road. These areas have much higher numbers of restaurants and bars than a residential area should have.
- A mechanism to prevent any further changes from A1 uses is required to maintain the number of shops in Brixton and to prevent any A3/A4/A5 conversions.
- A ‘saturation zone’ should be created for central Brixton to freeze the number of bars and to give licensing authorities the basis to reject new ones.
- Some bars and restaurants, particularly newer venues, don’t have enough bins for their waste which is then left on the streets.



- The Local Plan should commit to setting up a forum to co-ordinate the key players to address problems collectively and systematically.

### Policy context

#### National Planning Policy Framework 2019

4.11. Paragraph 85 of the National Planning Policy Framework (NPPF) 2019 states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – 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. Policies should also define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

#### National Planning Practice Guidance 2019

4.12. Evening and night time activities have the potential to increase economic activity within town centres and provide additional employment opportunities. They can allow town centres to diversify and help develop their unique brand and offer services beyond retail. In fostering such activities, local authorities will also need to consider and address any wider impacts in relation to crime, noise and security (Paragraph: 001 Reference ID: 2b-001-20190722).

#### London Plan

4.13. Paragraph 7.6.2 of the Draft London Plan Intend to Publish version December 2019 makes clear that the Mayor is keen to promote London as a 24-hour global city but that 24-hour activities are not suitable for every part of London and its residents and that boroughs should balance the needs of local residents with the economic benefits of promoting a night-time economy. It highlights that there are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism providing opportunities for social interaction, and making town centres safer by increasing activity and passive surveillance. However, it also acknowledges that managing issues such as transport, servicing, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment, and the potential negative effects on the health and wellbeing of Londoners, will require specific approaches tailored to the night-time environment, activities and related behaviour. Boroughs are encouraged to consider appropriate management strategies and mitigation measures to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers, particularly in areas with high concentrations of licensed premises.

- 4.14. The Draft London Plan Intend to Publish version December 2019 identifies town centres that have a strategic night-time function. These town centres are classified as being areas of international or national significance, areas of regional or sub-regional significance or areas with more than local significance. Brixton is identified as having a night-time economy of regional or sub-regional significance.
- 4.15. Policy HC6 of the Draft London Plan Intend to Publish version December 2019 states that boroughs should develop a vision for the night-time economy, supporting its growth and diversification, particular areas of night-time activity. In Development Plans, town centre strategies and planning decisions, boroughs should promote the night-time economy where appropriate; improve access, inclusion and safety; diversify the range of night-time activities; and address the cumulative impact of high concentrations of licensed premises on anti-social behaviour, noise pollution and health and wellbeing for residents and nearby uses and seek ways to diversify and manage these areas.
- 4.16. The approach to the management of the night-time economy should be an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported. The policy further states that boroughs should work closely with stakeholders such as neighbouring boroughs, the police, local businesses, patrons, workers and residents.
- 4.17. In addition, Policy E9 of the Draft London Plan Intend to Publish version December 2019 states the planning policies should manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the Draft London Plan including:
- a) town centre vitality, viability and diversity
  - b) sustainability and accessibility
  - c) place-making or local identity
  - d) community safety or security
  - e) mental and physical health and wellbeing

Draft Revised Lambeth Local Plan – Proposed Submission Version 2020

- 4.18. The DRLLP PSV 2020 introduces new policy clauses to policy PN3 to help promote and manage the evening and night-time economy in Brixton. The policy introduces an evening economy management zone on Acre Lane, Coldharbour Lane and Atlantic Road (see map 5 of the Proposed Changes to the Policies Map January 2020). The purpose of the evening economy management zone is to support the growth and diversification of the evening and night-time economy whilst managing any impacts on local residents and the local environment. The approach is consistent with both the NPPF and the Draft London Plan by balancing the needs of local residents with the

economic benefits of promoting a night-time economy. The policy approach seeks to align with the council's licensing policy and the emerging Brixton Evening Economy Strategy.

4.19. PN3 of the DRLLP PSV 2020 states Brixton's role as a distinctive, multicultural and diverse major town centre will be safeguarded and promoted through careful and sensitive regeneration, recognising its local distinctiveness and historic built environment, and supporting economic, social and environmental sustainable development. PN3c) and d) propose to manage evening economy uses through a threshold approach and through the introduction of an evening economy management zone.

4.20. This will be achieved by:

c) implementing an evening economy management zone which will seek to support the growth and diversification of the evening and night-time economy whilst managing its impact on local residents and the local environment. In the evening economy management zone, the proportion of units in evening and night-time economy uses (A3/A4/A5 and nightclubs) should not exceed 40 per cent, taking account of unimplemented planning permissions for change of use. No more than 10 per cent of ground floor units in the evening economy management zone should be in A4 use. In addition, no more than 3 in 5 consecutive ground floor units should be in evening and night-time economy uses (A3/A4/A5 and nightclubs), taking account of unimplemented planning permissions for change of use. There will be a presumption against the use of rooftops and terraces for evening and night-time economy uses (A3/A4/A5 and nightclubs) in the evening economy management zone unless it can be robustly demonstrated there will be no harmful impact as a result of these uses.

d) outside of the primary shopping area, indoor markets (as shown on the Policies Map) and evening economy management zone, ground floor uses should be in A, D or B use. The proportion of units in A4 and nightclub use should not exceed 5 per cent and no more than 2 in 5 consecutive ground floor units should be in A4 or nightclub use. This should take account of unimplemented planning permissions for change of use.

#### Evidence base

4.21. The thresholds in PN3 are based on a two main data sources on the existing number and concentrations of evening and night-time economy uses.

4.22. Lambeth commissions Experian Goad data annually for the six largest town centres in the borough and the Lower Marsh/The Cut CAZ frontage. The data provides a full list of the occupants of ground floor units across each town

centre surveyed and includes information on use class and vacancy.  
Lambeth's most recent Goad data set for Brixton is June 2018.

- 4.23. An in-house survey was undertaken in mid-March 2019 to cross-check the Goad data. The in-house survey found a number of additional units close to the edge of the Brixton major centre boundary that were not included in the Goad data set. These additional units were included in the survey results 2019. Where units were under-alteration, officers recorded each unit as per the proposed use as set out in the relevant planning permission for that site, for example, the arches along Atlantic Road and Brixton Station Road.
- 4.24. A full breakdown of the data for evening and night-time economy uses is set out in Appendix 1. A summary of the data is set out below:
- There are 203 units within the primary shopping area, excluding the three indoor markets. 40 units are in evening and night-time economy use within the primary shopping area.
  - In the 'non-primary shopping area' in the town centre, there 254 units. In total, 71 units are in either A3/A4/A5 use, a combination of those uses or nightclub use. This represents 28.0% of all the units within this area.
  - There is a greater number and proportion of units in evening and night-time economy use in the non-primary shopping area.
  - There is a high concentration of evening and night time economy uses within the non-primary shopping area, along Coldharbour Lane, Atlantic Road and Acre Lane. Of the 140 units in this area, 53 of these are in evening and night-time economy use. This equates to 37.9% of units.
- 4.25. The policy seeks to address the number of and concentration of evening and night time economy uses in Coldharbour Lane, Atlantic Road and Acre Lane by identifying the evening economy management zone. The threshold approach to A4 uses will manage the number of these types of uses whilst the 3 in 5 unit approach will manage the concentrations of these uses.
- 4.26. Outside of the primary shopping area and the evening economy management zone, the policy supports uses in A, D or B use but introduces a limit on A4 and nightclub uses to ensure that these uses are not displaced from the evening economy management zone, resulting in concentrations of these uses elsewhere in the town centre.

#### Draft Revised Lambeth Local Plan October 2018

- 4.27. The proposed evening economy management zone was consulted on as part of the Draft Revised Lambeth Local Plan October 2018. PN3 of the Draft Revised Lambeth Local Plan stated:
- c) Managing an evening economy management zone which will seek to support the growth and diversification of the evening and night-time economy

whilst managing its impact on local residents and the local environment. In the evening economy management zone the proportion of evening and night-time economy uses (A3/A4/A5 and nightclubs) should not exceed 40 per cent, taking account of unimplemented planning permissions for change of use. In addition, no more than 3 in 5 consecutive ground floor units should be in evening and night-time economy uses (A3/A4/A5 and nightclubs), taking account of unimplemented planning permissions for change of use. No more bars (A4) will be permitted.

d) Outside of the primary shopping area and evening economy management zone the proportion of night-time economy uses (A3/4/5 and nightclubs) should not exceed 20 per cent. In addition no more than 2 in 5 consecutive ground floor units should be evening and night-time economy uses (A3/A4/A5 and nightclubs). This should take account of unimplemented planning permissions for change of use.

- 4.28. Three respondents made comments that specifically related to the proposed evening economy management zone. The Mayor of London objected to the restriction on A4 uses in the evening economy management zone and stated a more flexible approach would reflect the Mayor's ambition to promote London as a 24 hour city and would support Brixton's NT2 status. In response to the Mayor's objection, the policy has been amended in the DRLLP PSV 2020 to include a threshold approach to A4 uses rather than a blanket restriction to offer a more flexible approach.
- 4.29. Lambeth Staying Healthy Partnership Board supported the designation of the management zone as did the Brixton Society. However, the Brixton Society argued that the management zone was too small and should include a wider area. The area suggested by the Brixton Society was reviewed but no changes have been made to the management zone in the DRLLP PSV 2020 as it is considered to be the appropriate boundary to manage the concentration of evening and night time economy uses in this part of the town centre, based on the evidence base (see above). Elsewhere these uses will be managed through a threshold approach.

### Brixton Indoor markets

- 4.30. The DRLLP PSV 2020 proposes amendments to the approach to each of Brixton's indoor markets (as shown on the Policies Map). The supporting text to PN3 recognises the historical and cultural importance of the indoor markets. PN3 states:
- b) requiring, in the indoor markets (as shown on the Policies Map), that no less than 50 per cent of floorspace should be in A1 use and no more than 50 per cent floorspace should be in A3 use within each indoor market (Brixton Village, Market Row, Reliance Arcade), subject to a management plan being in place that is agreed between the council and the managers of the indoor markets. The thresholds for A1 and A3 floorspace for each indoor market

relate to ground floor units and connected upper floors that share the same access for each indoor market. A4 uses in the indoor markets will not be permitted on both the ground floor and upper floors. All independently accessed upper floorspace in the each indoor market currently in D1 or B1 use will be protected.

- 4.31. The policy proposes that the thresholds for the markets in terms of A1 and A3 uses applies to floorspace rather than units as per the policy in the Local Plan 2015. This is to ensure that a range of unit sizes are maintained in each use, particular A1 units. The policy also seeks to protect B1 and D1 floorspace that is independently accessed to ensure that the existing D1 and B1 is not lost due to an increase in A3 uses.
- 4.32. The policy seeks to ensure that proposals to increase A3 uses within each indoor market is subject to a management plan being in place that has been agreed with the council. This is to ensure that the appropriate facilities and management arrangement are in place to cope with any potential increase in A3 facilities.
- 4.33. The policy restricts the provision of A4 uses in the indoor markets to manage any potential displacement of this type of use from elsewhere in the town centre, particularly the evening economy management zone.

#### Draft Revised Lambeth Local Plan October 2018

- 4.34. The proposed changes to how the split of A1/A3 uses is managed in the indoor markets was consulted on in the Draft Revised Lambeth Local Plan October 2018.
- 4.35. In response to the proposed changes to the approach to the indoor markets, Hondo Enterprises stated their support for the 50:50 split for A1/A3 uses within the ground floor of the markets. However, they expressed concern for the use of floorspace rather than units and argued that as some of the spaces on the first floor are larger than some of the units on the ground floor, it will inhibit the provision of A3 floorspace on the ground floor. They argued that the policy wording was too prescriptive, a more flexible approach should be taken for the upper floor and the policy should refer to the number of units.
- 4.36. The DRLLP PSV 2020 proposes to continue with the approach of managing the proportion of A1 and A3 uses by floorspace rather than units to ensure a range of unit sizes are maintained in each use and that existing B1 and D1 floorspace is protected. This approach is consistent with the two planning permissions for Brixton Village and Market Row (19/00559/FUL and 19/00559/FUL) which set out the thresholds for A1/A3 uses by both floorspace and by unit. It is also subject to a management plan which sets out how the increase in A3 units will be managed.

Permitted development rights

- 4.37. Some forms of development can be carried out as ‘permitted development’ under the Town and Country Planning (General Permitted Development) (England) Order 2015 (GDPO). Amendments to the GDPO occurred in 2017 and 2019. Permitted development rights mean that planning permission is not required before the development can proceed. Some of the permitted development rights which may affect the evening economy management zone, although some are subject to the prior approval process.
- 4.38. The permitted development rights and changes of use subject to the prior approval procedure that apply for changes of use from, or to, A3/A4/A5 uses are set out in Appendix 2. Potential implications of these permitted development rights are also set out in Appendix 2.

## Retail uses in Streatham

- 4.39. Streatham is one of Lambeth's major town centres and has two primary shopping areas. It is important that policies related to the mix of uses within the town centre are up to date and reflect changes in the retail offer.

## Policy context

### Lambeth Local Plan 2015

- 4.40. PN4 of the Lambeth Local Plan 2015 states that shopping uses will be safeguarded and appropriate new development supported. Within the major centre as a whole, no fewer than 60 per cent of ground floor units in each of the two primary shopping areas (Streatham Hill and Streatham Central) are to be in A1 use and within each area no more than 25 per cent food and drink uses (A3/A4/A5) and no more than 2 in 5 consecutive food and drink uses. Outside of the two primary shopping areas ground floor uses should be A, D or B1 use.

### Issues consultation

- 4.41. During the Issues consultation 2017, stakeholders were asked their views on how well Streatham was working as a town centre and whether Local Plan policies affecting Streatham needed to change. Generally, respondents argued that the current retail offer needs to be improved. Some respondents felt that the current retail offer is positive, with a good mix of uses. Others felt that there is not enough diversity in the retail offer and there is a need for more high quality retail units and tenants. It was also stated that the retail offer varies geographically and the whole of Streatham is not uniform in the quality of its retail offer. Some respondents questioned whether the area could naturally evolve with a mix of uses if the policy target for A1 retail was 60 per cent whilst another suggested that Streatham had the potential to become a non-chain 'boutique' style destination and suggested there is a need to protect retail changing to restaurant and bars.
- 4.42. Respondents argued that the night-time economy was limited compared to other towns in Lambeth and the restrictions on the number of bars and restaurants should be relaxed but more A3 uses should be encouraged instead of A4 uses.
- 4.43. Stakeholders who attended a consultation workshop in Streatham argued that there are many food uses in Streatham and there is still growth potential for these uses, with a focus on uses that provide an experience. Stakeholders felt that local people do not shop in Streatham as the retail offer is not as strong as centres such as Brixton and more retail units should be encouraged, with a greater variety of uses. Some stakeholders also felt that the current policy target of 60 per cent is an aspirational target and should be reduced to 50 per



cent to offer flexibility whilst others argued that it was important to keep the percentage of A1 uses as high as possible.

Draft Revised Lambeth Local Plan October 2018

- 4.44. Policy PN4 of the Draft Revised Lambeth Local Plan proposed that within the major centre as a whole, no fewer than 50 per cent of ground floor units in each of the two primary shopping areas (Streatham Hill and Streatham Central), no fewer than 50 per cent of ground floor units in each of the two primary shopping areas (Streatham Hill and Streatham Central) are to be in A1 use and within each area no more than 25 per cent food and drink uses (A3/A4/A5) and no more than 2 in 5 consecutive food and drink uses.
- 4.45. The proposed reduction in the policy requirement from 60 per cent to 50 per cent A1 uses reflected the amount of A1 retail units in each primary shopping area in 2017/18. In Streatham Hill Primary Shopping Area 50 per cent of units were in A1 use and in Streatham Central Primary Shopping Area 51 per cent of units were in A1 use (2017 Goad Data. Data showed that the town centre has seen a strong growth in retail services due to an increase in bars, cafes and restaurants and between 2012-2017 retail services have increased by 5.7% but there had been an overall decline in the number of units in A1, with a total loss of 19 units since 2012.
- 4.46. In response to the proposed threshold change, InStreatham BID stated that they agreed that the town centre's role is changing and there is a need to increase workspace on the ground floor of high streets to boost the daytime economy and to support the retail and food and drink offer. They stated they accepted that there will be a need to change the percentages of A1 retail retained but strongly maintain a need for some level of retail to maintain the provision for the local community. The BID also stated they agreed with need for diversification of the high street but there is a need to protect the primary shopping area in central Streatham. No other respondents commented on the proposed threshold changes.

Streatham Investment and Growth Strategy

- 4.47. The draft Streatham Investment and Growth Strategy recommend that a review is undertaken as to whether the minimum A1 threshold is appropriate. The consultation on the draft Investment and Growth Strategy did not seek people's views on the proportion of units to be in A1 use.

Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020

- 4.48. In light of updated evidence and the proposed changes to the town centre boundaries set out in section 3, it is proposed to no longer reduce the proportion of A1 uses from 60 per cent to 50 per cent. Instead, it is proposed to maintain the 60 per cent threshold for A1 uses in each primary shopping area.

- 4.49. An update to the Goad data (2019) demonstrates that, based on the current boundaries for there has been a further reduction in the proportion of A1 uses to 38.9 per cent of units, although this was in part due to an increase of units that are not in A1 use. The proportion of A1 units in Streatham Central remained the same.

Streatham Hill primary shopping area (based on current boundary)

Use Class	Count	Proportion (%)
A1	56	38.9
A2	15	10.4
A3	17	11.8
A4	7	4.9
A5	8	5.6
All other uses	41	28.47
Total number of units	144	

Streatham Central primary shopping area (based current boundary)

Use Class	Count	Proportion (%)
A1	75	51.0
A2	13	8.8
A3	10	6.8
A4	4	2.7
A5	6	4.1
All other uses	39	26.5
Total number of units	147	

- 4.50. As set out in section 3 it is proposed to amend the boundaries of the two primary shopping areas. The Goad data for 2019 shows that for the proposed Streatham Hill primary shopping area the proportion of A1 units would be 69.2 per cent and for Streatham Central primary shopping area it would be 60.4 per cent. Based on these figures and the proposed boundary changes it is proposed to maintain the A1 threshold at 60 per cent to ensure a retail core in both primary shopping areas is maintained. This is consistent with both the Streatham Investment and Growth Strategy and stakeholders views expressed during both the Issues consultation 2017 and the Draft Revised Lambeth Local Plan October 2018 consultation.

Proposed Streatham Hill primary shopping area

Use Class	Count	Proportion (%)
A1	9	69.2
A2	1	7.7
A3	3	23.1
A4	0	0
A5	0	0

Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020:  
 Topic Paper 4 – Town Centres

All other uses	0	0
Total number of units	13	100

Proposed Streatham Central primary shopping area

Use Class	Count	Proportion (%)
A1	64	60.4
A2	12	11.3
A3	7	6.6
A4	4	3.8
A5	3	2.8
All other uses	16	15.1
Total number of units	106	100

## 5. Betting shops and payday loan shops

- 5.1. Policy ED10 of the Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) relates to A2 uses, betting shops and payday loan shops.
- 5.2. Due to an amendment to the Use Classes Order in 2015, betting shops and payday loan shops were removed from the A2 Use Class. They are now a sui generis use which means they do not fall within a particular use class. This gives local planning authorities more opportunity to appropriately manage these uses.
- 5.3. The policy introduces a threshold approach for betting shops and pay day loan shops due to their negative impacts on town centres and health and wellbeing. This is also reflected in the relevant Places and Neighbourhoods Policies.

### Policy context

#### National Planning Policy Framework

- 5.4. Policy 91 of the National Planning Policy Framework 2019 (NPPF) states planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.
- 5.5. Planning Practice Guidance (Paragraph: 001 Reference ID: 53-001-20190722) states the design and use of the built and natural environments are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).
- 5.6. Policy 85 of the NPPF states planning policies should define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

#### London Plan

- 5.7. Draft London Plan Intend to Publish version December 2019 policy E9 states development plans and development proposals should manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the Draft London Plan including:

- a) town centre vitality, viability and diversity
- b) sustainability and accessibility
- c) place-making or local identity
- d) community safety or security
- e) mental and physical health and wellbeing.

### Evidence base

- 5.8. Further justification and supporting evidence for the proposed approach to betting shops and payday loan shops is set out in 'Evidence on A2 uses, betting shops and payday loan shops in Lambeth' October 2018.' It contains an overview of betting shops and payday loan shops in Lambeth and Lambeth-specific public health data.

### Draft Revised Lambeth Local Plan October 2018

- 5.9. The proposed threshold approach to betting shops and payday loan shops was consulted on in the Draft Revised Lambeth Local Plan October 2018. Lambeth Staying Healthy Partnership Board, InStreatham BID and Waterloo Community Development Group supported the proposals to reduce and restrict the numbers and clustering of betting shops and payday loan shops. One respondent suggested a levy on these uses, in a similar to CIL, which could benefit local residents. The London Borough of Wandsworth agreed with the identified issues associated with these uses, particularly on the negative effects on vitality and viability of town centres and on smaller parades.

## 6. Public houses

- 6.1. Over recent years many pubs in Lambeth have been lost to alternative uses, or have closed and are currently vacant. Public houses are protected by policy ED8 of the Lambeth Local Plan 2015. The policy includes a number of tests that must be met before the loss of a public house is acceptable. It also requires the retention of the building and any external features of interest if the public house is considered to be either of townscape value or a heritage asset and resists the loss of cellarage and other features which might render the public house unviable will also be resisted.
- 6.2. This section summarises the minor changes to policy ED9 of the Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) in response to changes to permitted development rights and the Draft London Plan. This includes increasing the marketing exercise requirement from 12 months to 24 months and assessing whether a pub has a heritage, cultural, economic or social value in accordance with the Draft London Plan.

### Policy context

#### National Planning Policy Framework 2019

- 6.3. Paragraph 92 of the NPPF requires LPAs to plan for the provision and use of community facilities, including (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and guard against the unnecessary loss of facilities and services that would reduce the community's ability to meet its day-to-day needs.

### London Plan

- 6.4. The Draft London Plan has introduced a new policy to protect public houses across London. Policy HC7 of the Draft London Plan Intend to Publish version December 2019 protects public houses where they have a heritage, economic, social or cultural value to local communities or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. The policy offers support to new public houses where they would stimulate those areas and mixed-use developments, taking account of potential negative impacts. Proposals involving the loss of a public house should include a 24 month marketing period. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of a public house that would compromise the operation or viability of the public house use should be resisted.

### Permitted development rights

- 6.5. Changes to the Town and Country Planning (General Permitted Development) (England) Order 2015 have removed permitted rights that previously allowed pubs and bars to change to shops, financial and professional services, restaurants and cafes without planning permission. This offers greater protection for public houses and also introduces permitted development rights for a new mixed use (A3/A4) which provides flexibility to enhance the food offer in public houses.

### Evidence base

- 6.6. In 2013, the council produced a list of public houses in Lambeth to support the adoption of ED8 in the Lambeth Local Plan 2015. This list has been updated to form part of the evidence base for the DRLLP PSV 2020. The updated document provides a summary of the policy context, data on London-wide trends for the closure of pubs and a list of current, new and closed pubs in Lambeth since 2013.

### Issues consultation

- 6.7. The Local Plan Review Issues consultation asked stakeholders whether ED8 should be amended to require applicants to demonstrate that a pub is no longer needed before a change of use to shops and other uses is allowed in light of changes to permitted development rights.
- 6.8. A total of 108 responses were received to this question, with the majority of responses (76%) either strongly agreeing or agreeing that we should add to our existing policy. Respondents were concerned about the loss of pubs and felt that pubs are a valuable resource for communities and contribute to a diversity of uses in a town centre. Respondents gave examples of where the loss of accommodation associated with the pub has resulted in the total loss of the pub.

### Draft Revised Lambeth Local Plan October 2018

- 6.9. Policy ED9 of the Draft Revised Lambeth Local Plan was amended to align with the Draft London Plan policy HC7. The marketing exercise requirements were increased from 12 months to 24 months and an assessment was required on whether there would be a loss of a service or facility of particular heritage, economic, social or cultural value to the local community. The listing of a pub as an Asset of Community Value will also be a material planning consideration.
- 6.10. The policy provided further protection for facilities within pubs that contribute to them being economically viable, by making reference to staff accommodation within the curtilage of the public house. It set out clear

support for new public houses within Lambeth’s town centres, subject to other development plan policies in accordance with the Draft London Plan, including issues such as licensing ‘cumulative impact zones’ and the agent of change principle.

- 6.11. Three respondents supported the policy. Three respondents made suggestions of how the policy could be further improved. In light of these comments the policy was amended to make reference to the CAMRA definition of a public house.



## 7. Hot food takeaways

- 7.1. The Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) retains the council’s policy on hot food takeaways that was first adopted in the Local Plan 2015. Lambeth is one of 24 London boroughs that have a policy on hot food takeaways in their adopted or draft Local Plans and one of ten boroughs to have an adopted Local Plan policy to restrict A5 uses within proximity of schools (London Plan topic paper: Hot food takeaways, January 2018). The policy has been amended to introduce restrictions on drive-through takeaways and ensures that impacts on neighbouring residential amenity are managed; and clarification has been added about how the 400m distance will be measured.
- 7.2. ED8e) of the DRLLP PSV 2020 states proposals for hot food takeaways (A5 uses) will not be permitted if proposed within 400 metres of the boundary of a primary or secondary school. The opening hours of hot food takeaways may be controlled through conditions where this is considered necessary to manage impacts on neighbouring residential amenity. Proposals for drive-through takeaways will not be permitted in any location. Proposals for the redevelopment of existing drive-through takeaways for other uses will be supported, subject to other development plan policies.
- 7.3. The supporting text sets out that the restriction of hot food takeaway shops within 400 metres from a school equates to a walking time of 10 minutes and will help to reduce pupils’ access to unhealthy food options. In accordance with the Draft London Plan, 400 metres will be calculated on the basis of the shortest walking distance from the entrances and exits of an existing or proposed primary or secondary school. In accordance with Draft London Plan policy E9, proposals for A5 uses may be conditioned to require the operator to achieve and operate in compliance with the Healthier Catering Commitment standard.
- 7.4. The policy will apply to applications for hot food takeaways in the borough and will therefore not affect Lambeth’s existing hot food takeaways unless a planning application is made in relation to the existing use. Hot food takeaways are classified within the Town and Country Planning (Use Classes) Order 1987 (as amended) as A5 uses, for the sale of hot food for consumption off the premises. Restaurants and cafés, which are for the sale of food and drink for consumption on the premises, are classified as A3 uses. Sandwich bars are classified as A1 uses. Planning permission will be required for the change of use to an A5 unit.
- 7.5. The policy is consistent with both national and regional policy and seeks to help ensure young people in Lambeth have access to healthy food options. It is supported by Lambeth-specific evidence which demonstrates the impact A5 uses can have on the health of Lambeth’s population and part of a wide range

of measures being implemented to safeguard the health and wellbeing of children and young people in Lambeth. There have been growing concerns about the diet of Lambeth children and young people, with a recognition that many pupils are regular consumers of fast foods. This can be observed particularly around the end of the school day when school children can be seen on the streets or on public transport with these foods. The policy applies in relation to both primary and secondary schools which is consistent with the Draft London Plan and is appropriate given that eating and drinking habits are formed at an early age and not all primary school pupils will be accompanied home by an adult. The majority of secondary school pupils travel to and from school independently and pupils may be allowed out of school premises at lunchtimes which allows pupils to buy food from takeaways at lunchtimes and on their journey home from school when they are not supervised by an adult. The policy will work alongside other policies in the development plan to improve health and wellbeing, including the protection of open spaces and the promotion of sustainable modes of transport and walking and cycling. The mix of uses, including A5 uses, in town centres will also be managed through relevant Places and Neighbourhood policies. The approach to drive-through takeaways aims to support the both the council's and TfL's priorities of reducing car use, increasing walking and cycling and improving air quality.

### Policy context

- 7.6. ED8e) of the DRLLP PSV is consistent with both national policy and guidance and the Draft London Plan. National planning policy and guidance is clear that, where justified, planning policies can seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate and this should consider the proximity of these uses to locations where children and young people. It is also consistent with the Draft London Plan which seeks to establish a consistent approach across London.

### National Planning Policy Framework

- 7.7. Paragraph 91 of the National Planning Policy Framework 2019 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

### National Planning Practice Guidance

7.8. Planning Practice Guidance sets out planning can influence the built environment to improve health and reduce obesity and excess weight in local communities (Paragraph: 004 Reference ID:53-004-20190722). Local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. Planning policies and supplementary planning documents can, where justified, seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate (and where such uses require planning permission). In doing so, evidence and guidance produced by local public health colleagues and Health and Wellbeing Boards may be relevant. Planning policies and proposals may need to have particular regard to the following issues:

- proximity to locations where children and young people congregate such as schools, community centres and playgrounds
- evidence indicating high levels of obesity, deprivation, health inequalities and general poor health in specific locations
- over-concentration of certain uses within a specified area
- odours and noise impact
- traffic impact
- refuse and litter

### London Plan

7.9. Through the Draft London Plan Intend to Publish version December 2019, the Mayor has introduced a new policy on hot food takeaways. E9C states development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also carefully manage the overconcentration of A5 hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.

7.10. To support this policy, the Mayor has produced a hot food takeaway topic paper which examines the impact of hot food takeaways on the health of Londoners; the prevalence of obesity in London; and current national, London and local planning policy on hot food takeaways. As set above, the GLA topic paper identifies Lambeth as being one of the 10 London Boroughs to have an existing, adopted Local Plan policy to restrict A5 uses within the proximity of schools. It also sets that childhood obesity is a major problem in London given that London has the highest level of childhood overweight and obesity in

England, with 38% of London's 10-11 year olds overweight or obese compared to 34% nationally.

### Draft Revised Lambeth Local Plan October 2018

- 7.11. The proposed policy approach was supported by a number of stakeholders, including the Lambeth Staying Healthy Partnership. The proposed approach to restricting drive-through hot food takeaways was supported by Transport for London for being consistent with the Mayor's Transport Strategy. They also stated that these uses can cause traffic congestion and road safety issues on the Transport for London Road Network.
- 7.12. KFC objected to the policy, arguing that the evidence for any influence of the proximity of hot food takeaways on the incidence of obesity or overweight is limited and conflicting. McDonalds also objected to the policy on the basis that the approach to drive-through takeaways is unjustified, the 400m exclusion zone is inconsistent with national policy, the policy is consistent, discriminatory and disproportionate and other policies of this nature have been found unsound.

### Evidence base

- 7.13. To support the policy in the adopted Local Plan 2015, locally specific evidence on the impact on health of hot food takeaways was produced by the Lambeth Public Health Team. The document 'Promoting Healthy Eating in Lambeth – Focusing on the impact on health of hot takeaway fast food outlets, September 2019'. This evidence has been updated to support the retention of the policy in the DRLLP PSV 2020 with up to date national, regional and local data on the impact of fast food on health. It also provides up to date data on the impact of drive-through takeaways. and has been informed by a range of studies, research and evidence base documents.
- 7.14. Some of the key findings of the Public Health evidence base document include:
- Fast foods tend to be high in fat and salt which are risk factors for obesity, cardiovascular disease and certain cancers.
  - Lifestyle risk factors including unhealthy diet continue to be major risks to good health amongst the Lambeth population.
  - Lambeth has a high rate of premature deaths from cancer and cardiovascular diseases. These conditions are diet related and are the top causes of death in the population. 56.2% of avoidable deaths in Lambeth are due to cancer and cardiovascular diseases, a large proportion is attributable to obesity and poor diet.
  - Obesity is a major public health concern in Lambeth and childhood obesity prevalence in Lambeth is higher than the national average. Latest results from

the National Child Measurement Programme (NCMP) show that levels of obesity in Reception and Year 6 children were 10.5% and 24.5% respectively.

7.15. Approximately 70% of obese children will become obese adults, giving rise to a higher risk of ill health, disability and premature mortality in adulthood. Approximately 50,000 adults in Lambeth are classified as obese. The Public Health evidence is clear that unhealthy diets and the causes of obesity are complex and multi-faceted and that single isolated initiatives do not work. Social, environmental and economic factors must be considered in addressing the ‘obesogenic’ environment. Lambeth is taking a system wide evidence-based approach to address this strategic priority and has a good track record of implementing a systematic and evidence based population approach, with a strong focus on children. Achieving a reduction in childhood obesity levels requires both preventive and treatment measures. Lambeth is implementing both measures which rely on addressing or modifying risk behaviours of unhealthy eating and physical inactivity. The interventions and programmes range across prevention and treatment interventions at individual, community and at borough policy level. These interventions include:

- A range of healthy weight commissioned services.
- Signing up as the first borough to sign the Local Authority Declaration on Healthier Food and Sugar Reduction.
- Facilitating and securing additional resources for Lambeth schools as part of the proceeds of the national Sugar Levy to promote healthy eating and physical activity.
- Having inner London Food Flagship borough status in recognition of the good work locally on healthy weight and promoting a healthier and more sustainable food system.
- Promoting the uptake of food schemes for vulnerable families such as the Healthy Start vouchers with a local supplement for additional fruit and vegetables (Rose vouchers) from Brixton market.
- Implementing the Healthier Catering Commitment (HCC), by working with local food businesses to commit to healthier catering through the provision of healthier food and drink options. Lambeth Council Food Safety team works with local food business encouraging them to sign up to the HCC.
- Working with Leisure service providers to provide healthier options in their vending machines.
- Running practical cook and eat sessions for members of the community.
- Working with local community organisations to promote food growing and access to other local food related activities.
- Working with colleagues to implement the Active Lambeth strategy (Lambeth Physical Activity and Sports Plan 2015 to 2020). The implementation of local campaigns and projects to promote and encourage children, young people and families to participate with physical activity, e.g. Sport England’s “This Girl Can” programme.

- Participation in a London superzone pilot that is looking to promote a healthier environment around schools (within 400m).
- Working across schools and community to encourage children and families to eat more vegetables by aligning with the national programme of Veg Cities.

7.16. The Lambeth Public Health review of evidence and best practice concludes the DRLPP PSV should continue to restrict new A5 uses, including drive-throughs, within 400m of primary and secondary schools and should be seen as part of a whole systems approach to promoting healthy eating and tackling obesity in Lambeth. This forms part of a range of recommendations that form part of an integrated, multi-disciplinary and multi-agency approach to improving health and reducing health inequalities in Lambeth. Other recommendations include working with local businesses to enable them to provide healthier options, a whole school approach to healthy eating, encouraging independent local food businesses which provide sustainable, affordable and healthy food, promotion of the Healthy Start Scheme in Lambeth and working with local communities to raise awareness around healthy eating. The Public Health team will also continue to update the Joint Strategic Needs Assessment with relevant food related quantitative and qualitative data to further develop the local evidence base for appropriate supportive interventions.

## Appendix 1: Data on evening and night-time economy uses in Brixton

### Primary Shopping Area

1.1. There are 203 units within the primary shopping area, excluding the three indoor markets. As shown in the table below, the majority of units are in A1 (shop) use (65.0%). Only 19% of the units are in A3/A4/A5 (food and drink) uses. One other evening and night-time economy use is located in this area; the Brixton Electric nightclub. In total, 40 units are in evening and night-time economy use within the primary shopping area.

*Table 1. Breakdown of units within the primary shopping area by use class*

Use	Count	Proportion (% of total units)
A1	132	65.0
A2	13	6.4
A3	30	14.8
A3/A4*	1	0.5
A4	5	2.5
A5	3	1.5
B1	11	5.4
C1	1	0.5
D2	1	0.5
SG	6	3.0
<b>Total</b>	<b>203</b>	

\*These units have a planning permission for a mix of uses. For example if a unit has permission for a restaurant and a bar, it is recorded as A3/A4.

### Non-Primary Shopping Area

1.2. The remaining area of the major centre is considered to be 'non-primary shopping area'. Within this area, there are 254 units including two nightclubs, Phonox and Club 414. In total, 71 units are in either A3/A4/A5 use, a combination of those uses or nightclub use. This represents 28.0% of all the units within this area.

*Table 2. Breakdown of units within the non-primary shopping area by use class*

Use	Count	Proportion (% of total units)
A1	110	43.3
A1/A3	4	1.6

A2	16	6.3
A3	39	15.4
A3/4	8	3.1
A4	10	3.9
A5	8	3.1
B	1	0.4
B1	13	5.1
B8	5	2.0
C1	1	0.4
C3	12	4.7
D1	9	3.5
D2	4	1.6
SG	14	5.5
<b>Total</b>	<b>254</b>	

- 1.3. A comparison of units within the primary shopping area with those in the non-primary shopping area shows that there is a greater number and proportion of units in evening and night-time economy use in the non-primary shopping area.

*Table 3. Comparison of units within the primary shopping area and non-primary shopping area*

Use	Primary shopping area count	Proportion (% of total units)	Non-Primary shopping area count	Proportion (% of total units)
A1	132	65.0	110	43.3
A1/A3	0	0	4	1.6
A2	13	6.4	16	6.3
A3	30	14.8	39	15.4
A3/4	1	0.5	8	3.1
A4	5	2.5	10	3.9
A5	3	1.5	8	3.1
Non-retail uses	19	9.0	59	23.2
<b>Total</b>	<b>203</b>		<b>254</b>	

*Table 4. Location, count, and proportion of evening and night-time economy uses*

Area	Count of ENTE units	All units	Proportion (% of total units)
Primary shopping area	40	203	19.7
Non-primary shopping area	71	254	28.0



Proposed evening economy management zone

1.4. The area with the highest concentration of evening and night time economy uses is comprised of 140 units primarily located on Coldharbour Lane, Atlantic Road and Acre Lane. It also includes a handful of units on Rushcroft Road, Vining Street and one on Brixton Oval. 53 of these units are in evening and night-time economy use. This equates to 37.9% of the units.

*Table 5. Breakdown of units within the proposed evening economy management zone by use class*

Use	Count	Proportion
A1	57	40.7
A1/3	1	0.7
A2	5	3.6
A3	29	20.7
A3/4	8	5.7
A4	10	7.1
A5	4	2.9
B1	7	5.0
C1	1	0.7
C3	7	5.0
D1	5	3.6
D2	1	0.7
SG	5	3.6
<b>Total</b>	140	

1.5. In terms of concentrations and clustering, there are four consecutive units in evening and night-time economy use along the south side of Coldharbour Lane up to and including 1 Brixton Oval. Four out of five consecutive units between 435 and 447 are in evening and night-time economy uses. There are also three evening and night-time economy units in a row, as originally constructed, at 419-423 Coldharbour Lane. These have recently been amalgamated into one large A3/A4 unit, however they have been recorded as three A3/A4 units for the purposes of this survey. On Coldharbour Lane, there are also high concentrations of evening and night-time economy uses between 395 and 403 (three out of five), and between 389 and 395 (four out of five). On the north side of Coldharbour Lane, there are high concentrations between 412 and 426 (up to three in five units), 378 and 386 (up to three in five units), 354 and 346A (three in five), 338 and 330A (four in five) and between 332 and 324 (four in five). There also high concentrations of these units on Vining Street (1-7) and Atlantic Road (four in five between 64 and 76, and between 69 and 79).

Summary of evening and night-time economy uses across Brixton

*Table 6. Count, location and proportion of evening and night-time economy uses*

<b>Area</b>	<b>Number of ENTE units</b>	<b>Number of all units</b>	<b>Proportion in ENTE use</b>
Primary Shopping Area	40	203	19.7%
Non-primary Shopping Area	71	254	28.0%
Proposed evening economy management zone	53	140	37.9%

- 1.6. Acre Lane, Atlantic Road, and Coldharbour Lane accommodate a much higher proportion of units in evening and night-time economy uses than any of the other areas of the major centre. Over one in three units are in such uses.
- 1.7. Excluding this area from the figures for the non-primary shopping area, there are 114 units, 18 of which are in evening and night-time economy uses. One of these units is a nightclub (Phonox). This equates to 15.8% of all of the units in the non-primary shopping area (excluding the proposed evening economy management zone).

*Table 7. Breakdown of units in the non-primary shopping area, outside of the proposed evening economy management zone by use class*

<b>Use</b>	<b>Count</b>	<b>Proportion</b>
A1	53	46.5
A1/A3	3	2.6
A2	9	7.9
A3	10	8.8
A5	4	3.5
B1	6	5.3
B8	7	6.1
C3	5	4.4
D1	4	3.5
D2	3	2.6
SG	10	8.8
<b>Total</b>	114	

## Appendix 2 – Permitted development rights for evening and night-time economy uses

2.1. Table 1 summarises the permitted development rights that relate to changes of use from, or to, A3/A4/A5 uses. Some changes of use are subject to a prior approval procedure with the local planning authority. This seeks approval of various matters, dependent on the nature of the use, but might typically include matters relating to parking and highways, flooding, and contaminated land. These are summarised in Table 2.

*Table 1: Permitted development rights in the Town and Country Planning General Permitted Development Order (as amended) affecting evening and night time economy uses*

<b>Schedule 2, Part 3, Class</b>	<b>Change of Use From</b>	<b>Change of Use To</b>	<b>Subject to Prior Approval?</b>
Class A	A3 or A5 (omit A4)	A1 or A2	No
Class AA	A4	A4 with A3 i.e. drinking establishments with expanded food provision	No
	A4 with A3 i.e. drinking establishments with expanded food provision	A4	No
Class B	A5 (omit A4)	A3	No
Class C	A1, A2, betting office, pay day loan shop or casino	A3	Yes
Class JA	A5 (also A1, A2, betting shop, pay day loan shop or launderette)	B1a	Yes
Class M	A5 (also A1, A2, betting shop, pay day shop or launderette)	C3	Yes

*Table 2: Permitted development rights affecting evening and night time economy uses (subject to prior approval)*

<b>Schedule 2, Part 3, Class</b>	<b>Change of Use From</b>	<b>Change of Use To</b>	<b>Matters to be assessed</b>
Class C	A1, A2, betting office, pay day loan shop or casino	A3	Noise, odour, storage and handling of waste, impact of the hours of opening, transport and highways impact and the siting, design or external appearance of the facilities provided. Also in this case, authorities can assess whether it is undesirable for the building to change to an A3 use because of the impact on provision of services that may be provided by a building in A1 or A2 use but only where there is a reasonable prospect of the building being used to provide such services, or where the building is located in a key shopping area, on the sustainability of that shopping area.
Class JA	A5 (also A1, A2, betting shop, pay day loan shop or launderette)	B1a	Transport and highways impact, the impact of the change of use on adequate provision of A1 (shops), A2 (financial and professional services) or A5 (hot food takeaway) or a launderette, but only where there is a reasonable prospect of the building being used to provide such services; or where the building is located in a key shopping area, on the sustainability of that shopping area; and impacts of noise from commercial and retail premises on the intended occupiers of the development
Class M	A5 (also A1, A2, betting shop, pay day shop or launderette)	C3	Transport and highways impact, contamination risk, flooding risks and the design or external appearance of the building. Authorities can assess whether it is undesirable for the building to change to a dwellinghouse because of the impact of the change of use on adequate provision of services of the sort that may be provided by a building falling within Class A1 (shops), A2 (financial and professional services) or A5 (hot food takeaways) or, as the case may be, a building used as a launderette, but only where there is a reasonable prospect of the building being used to provide such services, or where the building is located in a key shopping area, on the sustainability of that shopping area.

- 2.2. One implication of the permitted development rights is that existing A1 or A2 units in the proposed evening economy management zone could change to A3 without planning permission. However, the prior approval process enables the local planning authority to take into account the impact of the change of use on the adequate provision of A1 or A2 uses and how the proposed change of use could impact on the 'key shopping areas'. The prior approval process is considered adequate to ensure this permitted development right does not negatively affect the proposed evening economy management zone's ability to manage the proportion of A3 uses. This is because the paragraph 6.61 of the DRLLP PSV 2020 sets out that for the purposes of the prior approval process, key shopping areas are considered to be designated town centres or CAZ retail cluster. As the proposed evening economy is the town centre, the prior approval will enable the council to consider how the loss of A1 or A2 units will impact on the key shopping area.
- 2.3. Permitted development rights also allow change of use from A3 or A5 uses to A1 or A2 without planning permission. They also allow change of use of A5 to offices and residential without planning permission. This could result in evening economy uses being lost to other uses. This may help reduce the number and concentration of evening and night time economy uses in the evening economy management zone.
- 2.4. Permitted development rights allow drinking establishments to expand their food offering beyond that which is considered ancillary, and to change from such use to use as a drinking establishment. The new right does not allow drinking establishments to expand their restaurant or café use in such a way that use as a drinking establishment becomes ancillary. Therefore A4 uses can change to A3/A4 without planning permission and vice-versa. This would not impact on the overall number or concentration of evening and night time economy uses, however it could impact on the number of A4 units.