

London Borough of Lambeth

Economic Development Topic Paper

November 2013

1. Purpose of the Topic Paper

- 1.1 This Topic Paper sets out the detailed justification and analysis of supporting evidence for the policies in the Economic Development, Retail and Town Centre Uses section of the Lambeth Local Plan Proposed Submission November 2013. It describes the alternative policy approaches considered and the reasons for the chosen approach, in light of the supporting evidence and comments received on the Draft Lambeth Local Plan in March-April 2013.

2. Introduction

- 2.1 As part of the process of preparing the Lambeth Local Plan, the council reviewed the adopted Lambeth Core Strategy from 2011 and the existing Saved Lambeth Unitary Development Plan (UDP) policies and looked at the justification for these in the light of priorities set by the National Planning Policy Framework (NPPF), the London Plan, the Co-operative Council outcomes it now follows and other council plans and strategies.
- 2.2 The NPPF states that the planning system should be contributing to a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.
- 2.3 The NPPF also states that Local Plans need to be more flexible and responsive to 'market signals' to ensure that there is adequate provision of the right type of employment land to meet the needs of business communities. It suggests that local planning authorities will need to develop policies that support existing business sectors as well as identifying and planning for new or emerging sectors to locate in their area.
- 2.4 The government is committed to building a strong competitive economy in order to bring jobs and prosperity and wants the planning system to do all it can to support sustainable economic growth. The government urges local authorities to plan proactively to meet the needs of business and support an economy fit for the 21st century.
- 2.5 However, the NPPF warns that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- 2.6 The NPPF also states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of town centres over the plan period. Local authorities should recognise that they are the heart of local communities and that a hierarchy of centres resilient to anticipated future economic change should be defined.

- 2.7 At a regional level, a key theme of The London Plan 2011 is to ensure that the continued growth and economic development of all parts of London is provided for. The Plan aims to ensure that London continues to excel as a world capital for business, while also supporting the success of local economies and neighbourhoods in all parts of London. The policies in the London Plan are also intended to provide the basis for success of all kinds and sizes of enterprise in the capital.
- 2.8 Within the Lambeth Local Plan the Economic Development Retail and Town Centre Uses policies (ED1-14) are one of its key elements and were formulated with these provisions in mind. The council is committed to encouraging growth in Lambeth as a way of improving the economy of the borough, creating new employment opportunities and reducing unemployment. Forecasts suggest that in the next two decades there will be an unprecedented level of new investment and jobs for Lambeth. The council needs to respond to this growth and ensure that it benefits the borough, its citizens and the business community. It is expected that the main areas for growth will be Waterloo, Vauxhall and Brixton. The council needs to maximize employment opportunities for its citizens and work to ensure that Lambeth is as recession-proof as it possibly can be.
- 2.9 The NPPF requires local planning authorities to have a clear understanding of business needs within economic markets operating in and across their area and asks that a robust evidence base be maintained. It states in paragraph 161 that the evidence base should be used to assess (amongst other things):
- The needs for land or floorspace for economic development, including retail and leisure development.
 - The existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.
 - The role and function of town centres and the relationship between them.
 - The capacity of existing centres to accommodate new town centre development.
- 2.10 The policies within the Lambeth Local Plan were influenced by a number of studies commissioned by the council including:
- Retail and Town Centre Needs Assessment March 2013. Nathaniel Lichfield & Partners. This study includes an assessment of future needs for additional retail and commercial leisure facilities within Lambeth up until 2026 and an analysis of the role and function of existing centres in the borough.
 - Employment Land Review February 2013. Atkins Ltd/Regeneris. This study looks at demand for employment land in the borough and assesses it so that it complies with the requirements of the NPPF including the need to be more flexible and respond to market

signals. Amongst other things, it analyses the council's surveys of Key Industrial and Business Areas; its published commercial development pipeline reports; and the London Office Policy report from 2012.

- Promoting Healthy Eating in Lambeth 2013. NHS Lambeth. This study looks into the impact of poor nutrition and diets in the borough and provides recommendations for the use of planning policies as part of a wider strategy to promote healthy eating. It helped provide the evidence for the policy in the Local Plan to control the location of hot food take-aways near schools.

2.11 In addition, the council had a number of other research sources including:

- Lambeth KIBA Survey 2012. This is a survey of all 27 KIBAs in the borough indicating levels of occupancy and types of uses. The council carried out the survey in August 2012. It found that only 10% of the total floorspace and 7% of the total B class floorspace in KIBAs was vacant.
- GOAD Town Centre Survey information 2012. This provides up to date information on the composition of Lambeth's most important town centres giving details of vacancy rates and other commercial uses at ground floor level.
- Retail and Leisure Uses in Lambeth May 2012. This document provides a snapshot of the retail and leisure provision in the borough in May 2012 and provides a quantitative assessment of the range and distribution of convenience, major comparison and leisure provision. It also identifies their distribution across various designated retail centres and the availability of car parking and, where available, the size of the premises/facility.
- Lambeth Local Economic Assessment 2011 provides a picture of the current economic situation in Lambeth and its trends, alongside factors that will impact upon London and the borough in the future
- Lambeth Commercial Development Pipeline 2011-12. This is the Council's annual monitoring report on completions of business floorspace, the amount under construction and outstanding planning permissions. This is an indication of actual demand for new floorspace and the type of floorspace categorized by Use Class.

2.12 In view of the strong demand and limited availability of business floorspace in the borough shown by the above research and the support for strengthening the approach for safeguarding employment land and opportunities expressed through the various public consultation stages in the preparation of Lambeth's Core Strategy and now the emerging Lambeth Local Plan, the council considers that the protection of

employment-generating land and buildings in the borough needs to be maintained.

- 2.13 The need to promote and protect existing town centres is also a key objective and bearing in mind the results of public consultation on the draft Local Plan there is a need for the Council to formulate policies to address the needs and aspirations of each of its major and district shopping centres.
- 2.14 The policies in the Economic Development Section of the Plan are designed to support the implementation of the council's growth agenda and to conform to NPPF guidance and the London Plan.

3. Key Industrial and Business Areas (Policy ED1)

- 3.1 Key Industrial and Business Areas (KIBAs) have been a vital element of the council's planning strategy for many years and were included in its adopted 2007 Unitary Development Plan and the adopted 2011 Core Strategy. They form the borough's strategic reserve of employment land and business use and are Lambeth's locally significant Industrial sites as defined in the London Plan (2011).
- 3.2 In formulating the policies for the Lambeth Local Plan the council reviewed the relevance of its approach to the protection of employment land in the light of the National Planning Policy Framework (NPPF). The council commissioned consultants Atkins Ltd/Regeneris to look at the demand and supply of employment land in the borough to assist in the development of the planning policies in the Local Plan.
- 3.3 The results from the Employment Land Review subsequently completed by Atkins Ltd/Regeneris concluded:
- “The study shows that the KIBAs are operating effectively and viably as employment locations (on the whole), and in particular the future employment land supply demand balance shows that there is sound justification for the continued protection of KIBAs and smaller sites. The employment policies that are in the Local Plan are supported by this evidence and accord with the NPPF and the London Plan.”
- 3.4 The Employment Land Review provides a robust evidence base and associated policy recommendations to assist in the development of policies in the council's emerging Local Plan. The study assesses the current provision for employment in the Borough. It provides an assessment of future demand and market demands and evaluates current policies and research in neighbouring authorities.
- 3.5 The study shows that the council's KIBAs are operating effectively and viably as employment locations (on the whole), and in particular the future employment land supply demand balance shows that there is sound justification for the continued protection of KIBAs and smaller

sites. The employment policies that are in the Local Plan are supported by this evidence and accord with the NPPF and the London Plan.

3.6 The Council had considered a number of options when formulating its employment policies in the draft Local Plan:-

- eliminating KIBAs altogether;
- retaining the concept of KIBAs but reviewing each one to see if they were worthy of retention or whether they needed boundary adjustments, based on the findings of the Employment Land Review;
- continuing with the schools exception clause included in the Core Strategy which allowed schools to be located in KIBAs

3.7 The council's desire to achieve substantial economic growth in the Borough meant that it would not remove KIBA designations without justification. Information from the council's KIBA survey 2012 and subsequent Employment Land Review 2013 showed that KIBAs were performing well, despite the difficult economic climate and had an acceptable level of vacancy compared to national indicators. Lambeth's KIBAs also represent the primary area of search for additional land for waste management use to meet the London Plan apportionment target. Lambeth Local Plan policies support the location of waste management facilities in KIBAs. The rationale behind this approach is set out in the council document 'Waste Evidence Base November 2013'.

3.8 In reviewing the KIBA designations, however, it became apparent that some adjustments to the boundaries were necessary.

3.9 The changes to the KIBA boundaries can be seen in the document 'Changes to the adopted Local Development Framework Proposals Map (January 2011)'. Most of the changes are relatively minor in nature and relate to omitting land in non-employment use or the addition of employment land inadvertently left out of the KIBA boundary when first designated. However, one KIBA is de-designated altogether (Bon Marche in Brixton) and 2 new KIBAs are designated (Hackford Walk and Abbeville Mews). The consultants carrying out the council's Employment Land Review have recommended the majority of these changes.

3.10 In regard to the exception clause for schools contained within Policy S3 of the Core Strategy which allowed for their location on employment land both within and outside of KIBAs, the council considered that this was no longer required as any proposal for a new school was best judged against the provisions of all policies in the plan.

4. Business, Industrial and Storage Uses Land Outside KIBAs (Policy ED2)

4.1 The council accepts that not all employment land outside KIBAs can be protected from non-employment development. In looking at options for the policy approach on such sites the council considered:

- allowing all employment sites to be lost to non-residential uses;
- allowing non-employment uses on employment sites provided some form of employment was re-provided;
- allowing non-employment uses on employment sites only if there was no loss of employment floorspace involved;
- retaining the need to have marketing evidence before allowing an employment site out of employment use but considering whether 18 months, 2 years or 3 years might be a more appropriate period than the current 1 year requirement.

4.2 The Employment Land Review showed that 84% of B class land was outside the borough's designated KIBAs. Bearing in mind the projected increased in demand for employment land, whichever future economy scenario was chosen from the Employment Land Review, it was not considered prudent to adopt policies allowing the total loss of employment sites to non-employment uses outside of the KIBAs in the borough. Whilst this approach might contribute greatly to housing targets for the borough, causing them to be far exceeded it would do nothing for the aim of the council creating new jobs in Lambeth – part of the council's growth agenda. A more measured and flexible approach was sought.

4.3 The option of ensuring that no employment floorspace was lost when development occurred was considered by the council to be a good starting point, as it potentially still allowed a mixed-use development proposal to come forward for a site. The council wished, where possible, to retain employment-generating uses but anticipated that there would be the possibility of redeveloping sites to a greater density and introducing other uses enabling mixed-use development to occur. It was felt that only stipulating that some form of replacement employment floorspace (but not giving an indication of how much) be provided was not prescriptive enough.

4.4 It was accepted, however, that there would be occasions when an employment site might no longer be capable of being retained for employment-generating use. In these instances the council would need to be convinced that there was no demand for an employment generating use on the site in question. A fully formed marketing campaign would therefore be needed. The council had to consider how long this should be for. The council's consultants recommended 2 years in their Employment Land Review Study, in common with many London Boroughs. The council, however, felt that the existing provision of 1 year was about right provided the marketing carried out was comprehensive and complied with the council's Employment Marketing Note. It would ensure that land and buildings were not left vacant and idle for too long.

- 4.5 The council also gave consideration to retaining the exception clause in Policy 23 of the Saved UDP, which allowed developments of solely affordable housing on employment land outside KIBAs. This clause was intended to assist in the creation of affordable housing in the borough. However, the council has had concerns about the effect of this policy on its ability to protect important employment sites in the borough and provision of affordable housing elsewhere had been successfully achieved and so this approach was not continued with.

5. Large Offices (greater than 1,000m²) (Policy ED3)

- 6.1 The London Office Policy Review (LOPR) 2012 is the most recent in a series of independent reviews of office market trends commissioned by the GLA. It includes robust monitoring benchmarks and associated time series data to illustrate key trends and market relationships and their bearing on policy. It includes:

- A review of office-based employment projections and office floor space need estimates to inform future alterations to the London Plan.
- An assessment of the impact of recent economic events on different parts of the London office market, and those which might be anticipated in the future.
- A review of London Plan town centre office development guidelines and associated policy proposals.
- An investigation of the 'mega-schemes' identified in LOPR 2009, their implications for office development within the Central Activities Zones, on its fringes, or beyond.
- Consideration of the potential for conversion of surplus office space to other uses, especially residential, in different parts of London.
- An overview of hybrid office/industrial buildings, their locational attributes and implications for office, industrial, transport and other policies.

- 6.2 The London Plan 2011 suggests that borough development plans should enhance the environment and offer of London's office locations in terms of physical attractiveness, amenities, ancillary and supporting activities as well as services, accessibility, safety and security.

- 6.3 The council considered whether its traditional approach to the location of large scale offices (over 1,000m²) near good public transport accessibility should be retained or whether it should refine its approach and allow such development anywhere in the Borough. For reasons of sustainability and the need to locate high trip generating uses near to public transport hubs, thereby reducing or even eliminating the need to travel by car, the council decided to retain its traditional approach. Whilst allowing large scale offices anywhere in the borough would have the advantage of creating employment generating activities throughout the borough it could prove to be a problematic approach if the use was situated away from good public transport routes and could introduce heavy car trip generation into principally residential areas.

6. Government B1a to C3 Permitted Development Rights

- 6.1 In January 2013 the government announced that it intended to bring in a change to permitted development rights which would allow the change of use from B1(a) offices to C3 residential use without the need to apply for planning permission. The new rights would be time limited for a period of 3 years and that at the end of that period the Government would consider whether the rights would be extended indefinitely. Local authorities were given 4 weeks to make bids for exemption to this general right.
- 6.2 The council submitted a strong case to the Government arguing that the Central Activities Zone, the major centres of Brixton and Streatham and its Key Industrial and Business Areas should be exempt from the proposed permitted development rights, as if they were not it would bring substantial adverse consequences to the Lambeth economy.
- 6.3 As a result, the government exempted the Central Activities Zone but rejected the council's request for Brixton and Streatham and its Key Industrial and Business Areas. The new provisions came into force in May 2013. However, policies contained in the Lambeth Local Plan do not take account of this change to planning legislation. A key consideration is that the policies within the Local Plan will be in place for 15 years and that the proposed change in permitted development rights was due to last initially only for 3 years in order for the government to review the effects of the proposal.

7. Approach to Town Centres

- 7.1 The council wishes to adhere to the town centre first principle enshrined in the NPPF. The NPPF states that local planning authorities should "define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary shopping centres in designated centres and set policies that make clear which uses will be permitted in such locations."
- 7.2 The council engaged consultants Nathaniel Lichfield and Partners to do an assessment of the need for town centre, retail, leisure, tourism and cultural use in Lambeth. The NLP study provides a guide to the shopping and town centre needs of the Borough up to 2020, 2025 and 2030. The principal conclusions of the analysis contained within this study include:
- That the emerging Local Plan policies in Lambeth Borough are consistent with the findings of the study and the NPPF.
 - That the strategy for Lambeth's centres should take a long-term view and should plan for growth post recession. The floorspace projections assume Lambeth can maintain its market share of expenditure. In order to achieve this new development and investment will be required.

- Maintaining existing market share and accommodating growth is consistent with the policy approach set out in the emerging Local Plan.
 - That the existing stock of premises should have a role to play in accommodating projected growth and that vacant shops could help to accommodate future growth. The study concludes that it is realistic to assume reoccupied units can accommodate about 8,300 sq m gross of commercial space.
 - Commitments and vacant units could accommodate most of the short-term growth up to 2020. However, growth in sales densities and vacant shops will not be able to accommodate all the future growth in retail expenditure, therefore potential development sites need to be identified through the development plan process to accommodate growth in the medium to long term.
- 7.3 Within the town centre first approach there are a number of possibilities as to the preferred balance of uses within town centres. The council needed to consider whether each town centre should have its own individual policies tailored to its own needs or whether to take the more traditional approach of having more general policies which were applied to the hierarchy of town centres borough-wide. The former approach would need careful consideration and sufficient evidence to justify a variation in policy.
- 7.4 The issue of how best to deal with the evening economy was particularly problematic. Almost 7% of Lambeth's jobs are in this sector. The night-time economy in areas such as Clapham High Street, Brixton and Vauxhall has brought investment and vitality to areas which were previously struggling to compete with neighbouring town centres. The night-time economy has given these areas a 'buzz'. But with it, it has also brought complaints from surrounding residents about the consequent noise, litter and unruly behaviour often associated with these activities, most especially in Clapham High Street.
- 7.5 In considering the policies to be included in the Local Plan the council would need to weigh up carefully whether it wished to continue to promote the night-time economy, not just in these areas of the borough but whether to consider promoting it in other parts of Lambeth, such as Streatham and Norwood.
- 7.6 After extensive public consultation the approach to town centres has changed significantly from what was in the draft Lambeth Local Plan. In the earlier, draft version of the Plan the council adopted a 'one size fits all' approach to retail policies for its town centres. This was an approach which had previously been used in the council's development plans for the borough including the 2007 Unitary Development Plan. It meant that all town centres were subject to the same borough wide retail policy.
- 7.7 However, in response to workshops, meetings, suggestions from and discussions with businesses and residents representing different areas

of the borough; and to reflect parallel work on the evening economy, licensing and the town centre commission, the proposed borough wide policy approach has been replaced by a differentiated, centre-specific approach in the Lambeth Local Plan Proposed Submission. This means that policies to manage the mix of town centre uses (such as retail and food and drink uses) is now different for all of Lambeth's major and district centres, to reflect local circumstances and issues. Each centre now has its own unique policy aimed at solving particular issues in individual centres.

- 7.8 The Lichfield study of town centres was used as the basis for the new approach and shaped how individual town centre policies were drawn up. The study, amongst other things, did a health check analysis of the main town centres in Lambeth and carried out town centre audits, setting out existing retail provision in each of these town centres. . The town centres policy (ED6) sets the council's general approach to development in town centres but the mix of uses allowable in town centres is set out in the places and neighbourhoods policies. Account must also be taken of policies ED7 (evening economy and food and drink uses) and ED9 (A2 uses).

8 Government proposals for temporary changes of use in town centres

- 8.1 In July 2012 the government consulted on a set of proposals which, amongst other things, included suggested changes to permitted development rights in local high streets in order to allow vacant and redundant buildings to come back speedily into productive use. This proposal would allow temporary uses of certain existing buildings (retail and other A classes, offices (B1) and non-residential institutions and assembly and leisure uses (D1 and D2)) to be used for certain specified new uses for a period of 2 years without the need for planning permission. To prevent inappropriate temporary use, the Government proposed that a local authority notification requirement would provide an opportunity to validate uses and allow subsequent monitoring of the temporary uses. At the end of the temporary use period, the planning permission for the use of the building would revert to its initial use unless a planning application was submitted and approved. The Government considered that uses that might be appropriate temporary uses were likely to be within use classes A1, A2, A3 and B1.
- 8.2 The government implemented this proposal in May 2013. Faced with this situation the council has formulated its policies in accordance with current legislation but has not taken account of this temporary exemption period. This is because the Local Plan will be in place for 15 years and the temporary 2-year period will not ultimately affect the council's control over uses in town centres.

9 A1 uses

- 9.1 The council has reviewed its policies relating to the protection of A1 uses in its shopping centres. In the Saved Unitary Development Plan, Policy 4 sought to ensure that no less than 50% of primary shopping frontages

were in A1 use. The council, having reviewed its evidence base; having taken account of the Lichfield study; and adhering to the provisions of the NPPF, felt that there was a need to increase the level of retail (A1) representation in its primary shopping areas to 60% to protect the attractiveness of the retail offer. In this way the most important parts of the shopping centre would retain a healthy proportion of retail (A1) use whilst allowing more flexibility for the likes of A2, A3, A4 and A5 uses to locate elsewhere in the shopping centre. This approach was supported during the consultation on the draft Lambeth Local Plan such that when the new centre specific approach to town centres was chosen for the Lambeth Local Plan Proposed Submission the aim of maintaining a minimum of 60% A1 retail use in primary shopping centres was retained.

10 A2 uses (Policy ED9)

- 10.1 In the last few years town centres in Lambeth, like many other inner London boroughs, have suffered from an influx of betting offices, pawn brokers and money shops which has altered the perception of the town centres vitality and viability. These uses tend to congregate in certain parts of town centres leading to negative impacts such as anti-social behaviour, crime and visually uninteresting frontages. These uses all fall within the A2 use class and thus are considered appropriate uses for town centres. The A2 use class also includes banks, building societies, and estate agents. These uses are more important to the vitality and viability of town centres and are generally welcomed by shoppers. The council needed to consider ways of controlling the perceived influx of betting shops etc in its town centres without preventing banks and building societies from locating there. The obvious solution to the problem would be to have a separate use class for betting shops but despite much recent government lobbying by various parties this has not occurred.
- 10.2 Faced with this, the council considered an option of introducing a policy which allowed A2 uses in a town centre but which stipulated that any permission given would have a condition attached which prevented the premises being used by betting offices, pawnbrokers, money lenders and the like. The council felt that this might be difficult to uphold for all cases, particularly at appeal. However, it was felt that in certain circumstances this might be appropriate if it was felt that such a use would adversely affect the vitality and viability of a particular centre or further exacerbate existing issues relating to effects of such uses on residential amenity.
- 10.3 The use of an Article 4 direction which, under the General Permitted Development Order 1995, can be issued if councils believe that a proposed development represents a significant threat to an area's character was also considered. The order removes permitted development rights, requiring a planning application to be made. However, an Article 4 direction works by exercising control over the entire use class – A2 – that betting shops fall within, so use of the direction might therefore exclude a number of other A2 uses that would be acceptable to the vitality and viability of town centres. Adopting an

Article 4 direction for this purpose could be very expensive, as the council would be required to conduct public and business consultations in each of the areas affected by the order, and pay compensation to retailers and other businesses where planning permission cannot be obtained because of the direction.

- 10.4 In the end the approach taken was to try and control the extent and location of A2 uses in town centres so that there would, in future, be a limit on the number of A2 uses present in a town centre and to avoid over-concentration. In the draft Lambeth Local Plan the council introduced a policy which stated that a threshold of no more than 25% of ground floor uses in town centres should be in A2 use and no more than 2 in 5 consecutive premises in such use outside primary shopping areas. The relevant policy in that document, ED10, though, suggested a condition might be imposed in certain circumstances.
- 10.5 For the Lambeth Local Plan Proposed Submission, the council has decided to strengthen its control by reducing the threshold for A2 uses from 25% down to 15% and applying the no more than 2 such uses in 5 consecutive premises rule to town centres as a whole (rather than just outside the primary shopping areas). This tightening of the policy reflects the increasing concern being expressed by local residents about the number of betting shops, pay-day lenders and pawnbrokers appearing in Lambeth's town centres. The document 'Location of Betting Shops, Pawnbrokers and Money Lenders in Lambeth April 2013' identifies the location of such uses in Lambeth. The threshold 15% was chosen as it closely resembled existing provision in many town centres and it would mean only limited scope for additional A2 uses to locate in the borough's town centres. Evidence from the NLP study (2013) shows that the proportion of A2 uses in Lambeth's larger centres is currently within the range 6% to 15%.

11 A3/A4/A5 uses (Policy ED7)

- 11.1 In the Lambeth Local Plan Proposed Submission the council has now taken the approach that within the major and district centres of the borough the policy threshold for A3/A4/A5 uses will vary according to local circumstances. These variations are now set out in the individual places and neighbourhoods policies. In some centres the council differentiates between A3, A4 and A5 uses.
- 11.2 In most respects A3 restaurant uses have less impact on the amenity of surrounding residential properties as most clients arrive and leave the premises sensibly and any car used to travel to the facility is parked legally and safely. Town centres such as West Norwood need more of these activities in order to stimulate the evening economy and to prevent the area going dead at night. On the other hand, A4 and A5 uses can often attract more rowdy customers who can prove to be a nuisance to nearby residents via the associated litter, noise, traffic and general disturbance that they tend to generate. In terms of A4 drinking establishments the effects of alcohol on customers can cause anti-social behaviour occurring in the local area.

- 11.3 So, in town centres such as Clapham High Street where saturation point appears to have been reached with the number of bars, pubs and hot food take-aways in operation, no further A4 or A5 uses will be permitted. In West Norwood no more than 15% and no more than 2 in 5 consecutive units should be in A5 use to stop the spread of hot food take-aways. Evidence from the NLP study (2013) shows that the proportion of A3/4/5 uses in Lambeth's larger centres ranges from 15% to 26%.

12 Hot Food Take-Aways near schools

- 12.1 As part of its commitment to reducing childhood obesity, the council considered whether it could bring into play any planning measures which would help reduce the attractiveness of fast food to schoolchildren. One measure, which some other London Boroughs have introduced, was to attempt to limit the location of new hot food take-aways near schools.
- 12.2 Research carried out by NHS Lambeth and other London Boroughs indicated that a 10 minute walk (400 metres) was a reasonable deterrent to schoolchildren being able to use these facilities at lunchtime or on the way home from school. The report 'Promoting Healthy Eating in Lambeth – Focusing on the Impact on Health of Hot Food Takeaway Fast Food Outlets March 2013' looks at the evidence on the contribution of fast food to diet related health conditions.'
- 12.3 Policy ED7(e) in the Lambeth Local Plan Proposed Submission is the council's attempt to limit the availability of hot food takes-aways to schoolchildren. It is a more stringent approach than what was in the draft Lambeth Local Plan which took the approach that hot food take-aways in town centres should not be counted. It was considered that to be fully effective the policy should also take account of hot food premises in town centres and this is now reflected in Policy ED7. The document 'Location of Take Away Hot Food Shops Near Schools April 2013' identifies the location of such uses in Lambeth.
- 12.4 This policy cannot affect the location of existing facilities but can ensure that the opening of new hot food establishments near schools does not exacerbate the situation.

13 Public Houses (Policy ED8)

- 13.1 There has been growing concern in the community about the loss of public houses in the borough. The important role that public houses play in society is well documented. They are a valued part of British society and culture contributing to an area's vitality, identity and character. They act as important social hubs for people to meet. The Mayor of London has recognised the loss of public houses is a major concern for Londoners and recently stated to GLA Conservative Assembly members that he would include a specific protection for community pubs in forthcoming planning guidance to try and stop them being taken over by developers.

13.2 In response to comments received during consultation on the draft Local Plan, the council has re-introduced a policy specifically dealing with the loss of public houses into the Plan, similar in some respects to saved UDP Policy 27 but including a new requirement to demonstrate that the pub is not a valued local community facility. This reflects paragraph 70 in the NPPF, which includes pubs in the examples of community facilities and states that local authorities should guard against the unnecessary loss of valued facilities.

14 Local Centres

14.1 The importance of local centres and isolated corner shops to the local community is recognised. They are particularly vital to those members of the community who are more elderly or have difficulty getting about. The local parade of shops can play a key role in the well-being of local residents.

14.2 In response to comments made during consultation on the draft Lambeth Local Plan, a new borough-wide policy has been introduced to the Proposed Submission version which articulates the council's view of these important local assets. The policy includes an approach to managing proportions of uses specific to local centres and is aimed at supporting and protecting the role of local centres and local shops.

15 Brixton Indoor Markets

15.1 In the draft Lambeth Local Plan, Brixton's covered markets, located in the primary shopping area of the town centre were, in policy terms, not treated any differently from the rest of the primary shopping area. Units in the covered markets were considered to be individual planning units subject to the same planning policies as shops in the high street.

15.2 However, in the light of consultation responses and discussion with the owners/managers, a new policy approach is set out in the Lambeth Local Plan Proposed Submission. The covered markets will have a separate designation on the Proposals Map (see 'Changes to the adopted Local Development Framework Proposals Map January 2011'). And the new policy approach will seek to achieve the following objectives:

- support economic growth and business start-ups
- support the contribution of Brixton Village to Brixton's regeneration
- retain the original retail function of the covered markets
- manage the amenity impacts of new food and drink uses

15.3 This policy approach requires:

- at least 50 per cent A1 and no more than 50 per cent A3 use in each covered market
- a management plan for the covered markets to be agreed between the council and the managers of the indoor markets; this could

potentially remove the requirement for individual change of use applications so long as the agreed proportions are not breached

16 Shopping Centre Designations and Boundaries

- 16.1 The council has reviewed the designations and boundaries of all its town centres and with the exception of Brixton major centre, Norbury district centre, Lavender Hill/ Queenstown Road district centre and Clapham South district centre was content that the designations and boundaries should remain unchanged.
- 16.2 In the case of Norbury District Centre, where only a small part of the centre sits within Lambeth with the greater part resting in Croydon, it was considered that the Lambeth portion of the centre no longer functioned as part of the shopping area and could be de-designated. Consultation with Croydon Council revealed that it, too, was making changes to the part of the centre adjoining the borough boundary which tied in with this proposal and which would ensure a consistency in approach.
- 16.3 In respect of Clapham South District Centre, which is partly in Lambeth and partly in Wandsworth, having reviewed the level of provision in the centre as a whole and taking account of representations made by the GLA and Wandsworth Council, the council has decided to downgrade the status of the centre from district to local. This better fits the level and type of shopping provision in the centre.
- 16.4 In the draft Lambeth Local Plan the council had proposed to de-designate part of West Norwood district centre along Norwood High Street, but as a result of comments received during the public consultation on the plan it was decided not to pursue this.
- 16.5 All the changes to the boundaries mentioned above (together with some further amendments to the primary shopping area boundaries in Stockwell, West Norwood and Lavender Hill/Queenstown Road centres) can be seen in the document 'Changes to the adopted Local Development Framework Proposals Map (January 2011)'.