

Lambeth Local Plan Examination

Waterloo Community Development Group

Matter 4 - Economic Development, Retail and Town Centre Uses

4.1 Building a strong, competitive economy: (i) Do policies ED1-15 positively contribute to building a strong, competitive economy in accordance with the requirements of the Framework? (ii) Is the Plan flexible enough to encourage new and innovative forms of workspace in response to a fast-changing industrial context?

4.4 Key Industrial and Business Areas (KIBAs): (i) Given the issues of stock availability and higher rents for small and medium enterprise (SME) uses, and the evidence pointing to some SMEs failing in the Borough, what is the justification to delete the business use element from policy ED3? (ii) What is the intention in KIBAs where the majority use is B1? Will further B1 extensions/improvements be acceptable under the new policy? (iii) How does this policy square with the MHCLG letter of 12 March 2020, which warns against the London Plan's industrial land policies taking an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand? (iv) Is the policy unduly restrictive to the principle of mixed-use development and co-location, which is promoted in national policy?

Both large and small offices can be developed across the borough, from the Opportunity Areas in the north to the town centres in the centre and south. There is far less conflict with residential uses and far more flexibility where they can go than other industrial and business uses.

Lambeth is the only borough in South London with no Strategic Industrial Land (SIL) identified in the London Plan, and has to rely solely on its own locally identified LSILs to provide the reservoir of cheap land protected for industrial and business uses. Lambeth has far less land for industry and transport than neighbouring boroughs, and less than 50% of the London borough average of 225 ha. The most recent review of Lambeth's KIBAs reported that only around 2% of land was currently vacant, which is remarkably low compared to London as a whole.

Lambeth's version of the LSIS, known as KIBAs have always been slightly at odds with these premisses and with the London Plan in including office use as a KIBA use. Lambeth has also flirted with a relatively flexible approach, with the UDP 2007 explicitly encouraging mixed use and co-location. The result was disastrous, with the loss of bits of KIBA across the borough (Lambeth lost around 25.5ha of industrial land between 2006 and 2015, including 25% of all KIBA land in Lambeth) and a 15 year struggle to develop the central vacant site in its most northerly KIBA (Southbank House and Newport St, and Site 10), with applications submitted, withdrawn, re-submitted, refused, appealed, refused, submitted again, and is currently called in for a decision by the Secretary of State and will be the subject of a public inquiry scheduled for December.

The demand for industrial land has been growing strongly, particularly within the distribution and logistics industry, and within the Central Services Area (that is, those industries servicing Central London), and there will be financial, environmental and local employment costs if these industries are forced to outer London or even outside London.

Furthermore, Local Plan policy is not designed to simply maximise the number of jobs a site generates. The strategic priority set out in the Lambeth Plan highlights achieving economic prosperity and opportunity including protection for clearly identified clusters of industrial land

which represent the borough's strategic reservoirs of land for lower value uses including industry and business support functions, and new and emerging technologies.

While a more flexible approach to co-location and mixed use might be appropriate elsewhere in London, given Lambeth's existing shortfall in protected industrial land, as well as the inordinate pressure such a flexible approach brings in an area of very high land values, the approach Lambeth is taking is entirely appropriate and we strongly support it.