

Examination of Draft Revised Lambeth Local Plan 2020 - 2035

Matter 4 – Economic Development, Retail and Town Centre Uses

**Examination Statement on behalf of the London Fire
Commissioner**

Overview

1. This statement has been prepared by Nexus Planning on behalf of the London Fire Commissioner (the LFC), who is currently working in partnership with U+I Group PLC to deliver the redevelopment of its former headquarters site at 8 Albert Embankment (including land to the rear of that), and has fire stations across the Lambeth Borough including at Brixton, Clapham, Lambeth and West Norwood.
2. A summary of the key issues that are of relevance to this Matter are provided below, but the LFC also continues to rely upon its representations to the Regulation 19 consultation (March 2020).

Matter 4: Economic Development, Retail and Town Centre Uses

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?

3. The blanket removal of the 'business' element from Policy ED3 relating to KIBA sites across the Borough would not be effective in providing site-specific flexibility to optimise the employment use and benefit of these KIBA sites.
4. Whilst some KIBA sites are most appropriate to meet current and future demand for industrial and related functions, consistent with Policy E4 (Land for industry, logistics and services to support London's economic function) of the draft London Plan (December 2019), not all are. Other KIBA sites are located amongst residential areas or where vehicular access is restricted making them better suited to office use that is appropriate to their surrounding character and environmental constraints.

5. Where a KIBA currently has a majority office use, and so under Policy ED3 that use and activity is suddenly no longer considered appropriate, the Policy cannot be considered positively prepared in that it would lead to the long term decline of such sites – where existing office stock cannot be replaced or invested into, especially where its value might be greater than other industrial, storage or waste management uses.
6. In respect of the allocation policy for 8 Albert Embankment and land to the rear (Policy PN2 Site 10), it is relevant that the majority of the site is in the Central Activities Zone (CAZ) and it wholly lies within the Vauxhall, Nine Elms and Battersea Opportunity Area (VNEBOA). The Council's 'Topic Paper 3 – Workspace' itself identifies the draft London Plan to support an increase in the current stock of offices within both the CAZ (Policy E1 Offices) and VNEBOA (Policy SD5). Unlike other Opportunity Areas, it is relevant that the VNEBOA gives offices equal weight to new residential. The revision to the KIBA policy is unsound because it is inconsistent with the draft London Plan.
7. The greater restrictiveness of Policy ED3 would provide further inconsistency with the allocation Policy PN2 Site 10 for 8 Albert Embankment, which seeks a mix of uses to include residential and employment. This requires the type of any employment to be compatible with new homes on the site, and those adjacent and in the surrounding area.
8. The merits of a mixed use development on Policy PN2 Site 10 have been considered by the Council in great detail in resolving to grant planning permission (application reference 19/01304/FUL) for a mixed use scheme including up to 443 residential units, a replacement fire station, fire brigade museum, hotel, retail units, gym and offices.
9. The officers' report is clear that:

"a mixed-use approach blending residential and employment on all three sites [together comprising Policy PN2 Site 10] delivers more varied job opportunities, more housing, an enhanced public realm and significant heritage benefits when compared with an alternative scheme for employment only within the KIBA." (Executive Summary) [LFC's emphasis]
10. The Mayor of London has confirmed he is content for the Council to determine that application in his Stage 2 response, with positive comments in relation to the principle of development:

"The redevelopment of this long vacant/under-used Opportunity Area/Central Activities Zone site will contribute significantly to Council and GLA's aspirations for the site, particularly residential uses, significant employment space (including 10% affordable), and emergency services facilities. The principle of development is supported."

11. This mixed use approach to redevelopment on Policy PN2 Site 10 is consistent with the National Planning Policy Framework in encouraging multiple benefits from urban land through mixed use schemes (paragraph 118).
12. Therefore, for the Local Plan to be effective in providing an appropriate strategy for the redevelopment of Policy PN2 Site 10, as evidenced through planning application reference 19/01304/FUL, the boundary for the Southbank House and Newport Street KIBA should be revised to exclude the area that is also covered by Policy PN2 Site 10.
13. It is noted that such an approach to reconciling conflict between a KIBA designation and a large scale mixed use redevelopment is being progressed by the Council for the Montford Place KIBA, where areas are proposed to be de-designated to reflect development management decisions.