

**Lambeth Local Plan Examination
Matter 4**

Main Matter 4: Economic Development, Retail and Town Centre Uses

These representations seek the updating of KIBA policy to support, where appropriate, the need for investment and change in the nature of employment space to address the changing nature of economic activity and society and enable investment in employment space to help increase employment density, jobs and homes and provide for integrated living and working environments.

For the avoidance of doubt, however, our representations seek the identification of the Lilford Road Business Centre as an area where mixed use redevelopment involving the colocation of residential and commercial or business uses would be supported. This can be achieved either through the amendment of policy ED3 to support mixed use redevelopment within KIBAs where it can demonstrate a qualitative or quantitative enhancement in the nature and type of employment space provided and provide for new housing (including the potential for largescale, purpose built shared living) in a manner that achieves acceptable levels of residential amenity and does not prejudice the employment potential of adjacent land, in accordance with the 'agent of change' principle.

In the alternative, should no change be forthcoming to update the overall approach to KIBAs, our representations would be met by the identification of the Lilford Business Centre as being appropriate for mixed use development under the terms of part c) of the policy.

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?

The simple answer to this is no. The policies as originally drafted and particularly now, as proposed to be changed in SD17a, are negatively structured to control and not promote development and as such they fail to recognise the needs of business and nature of employment space required within the Borough.

The approach to employment needs updating to reflect the future of employment and need to increase employment density and productivity through new investment, much of which can only come from mixed use developments designed carefully to deliver a growth in jobs, training and homes.

Policy can sometimes be a very blunt tool trying to influence something that either requires a simpler and more positive approach to encourage positive change, or one that is much more nuanced if it is to avoid creating unnecessary obstacles to growth and innovation. The policies also fail to recognise the historical development and physical characteristics of employment space within the Borough and the potential for positive change.

In this case, the net effect of the policies is to place complex restrictions on development in employment areas, which restricts growth and innovation and inhibits the provision of more and better employment space. It specifically seeks to stifle mixed use development, other than in a very limited number of cases, contrary to the policies of the NPPF. Mixed use development can provide enhanced employment space as well as new homes, services and other essential development in the unused airspace above brownfield sites.

The policies cumulatively restrict development and effectively retain the status quo. They do not positively promote growth and innovation. They do not provide for the main agents of change that

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can stimulate the growth. The Plan fails, therefore, to achieve the positive change sought by the NPPF and Intend to Publish London Plan.

Paragraph 80 of the NPPF says that Policies should actively help to create the conditions in which businesses can invest, expand and adapt. It says that significant weight should be placed on the need to support economic growth, taking account of business needs and opportunities for development.

It should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The policies as proposed, fail to do this and fail to address the inherent age and need for investment required to bring employment space up to standard that is fit for purpose.

Para 80 says this is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

Section 6 of The Economic Evidence Base for London 2016 (part of the evidence base for the London Plan) commented that in terms of the future structure of its economy, London will continue to specialise in services. Just over a third of all the projected employment is expected to come from the professional, real estate, scientific and technical activities sector. Information and communication, administrative and support services are also expected to see large increases in employment. This suggests a continuation of London's specialisation in these areas while education and health activities are also expected to grow.

One of the key challenges identified by the Government in the UK and also reflected in London is increasing productivity. A key component of this is increasing the productivity of employment space. This requires more efficient, usable employment space that better suits the needs of modern businesses and higher employment densities. This simply cannot be delivered using existing, often old and outworn employment stock designed for another era and another purpose. This is especially true in London where there is clearly limited land supply.

The Secretary of State's focus, quite rightly, on securing greater innovation in the mixed use redevelopment and release of London's employment land can deliver more and better employment space and at the same time liberate the air space above to meet London's housing crisis. It is a win-win. Policies ED1 and ED3 are at odds with the Secretary of State's policy imperative which is clearly underpinned in the NPPF.

An example of the potential for missed opportunity created by the policies in combination is the proposals by Bizspace and Caddick at Lilford Road, the subject of our LP Representations. The site is part of the area that surrounds Kings College Hospital and the Maudsley, both of which are leading healthcare institutions. They are part of King's Health Partners, an Academic Health Sciences Centre bringing together world-class research, education and clinical practice. The partners also include Kings College University and Guy's and St Thomas's. These are key parts of MedCity, promoted by the GLA and MedTech, the research and innovation hub for healthcare research and practice.

For such hubs to develop and thrive, they need good quality business space, suitable for SMEs, and good quality flexible residential accommodation, to support a mobile, global workforce in the healthcare, educational and scientific sectors. The proposals by Caddick and Bizspace address this requirement, with the potential to significantly increase the quality of employment and living space in an integrated manner and in a location within walking distance of the existing facilities. It has the

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potential to significantly increase employment density and productivity. The approach to the KIBA in ED3 prevents such development without any clear planning purpose.

Paragraph 81 of the NPPF requires planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, to identify opportunities for investment and to meet anticipated needs over the plan period. It requires policies to address potential barriers to investment, which in this case includes unnecessary policy barriers, and be flexible enough to accommodate change.

The NPPF (para 82) requires policies to recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge.

The GLA in their comments on the Submission Plan noted the net loss of industrial floorspace arising from the approach to KIBAs and questioned the degree to which the Plan sought to encourage additional industrial capacity through intensification. While addressing industrial capacity, the same applies for wider commercial activity in the KIBAs, particularly now that the policy seeks to eliminate B1 uses.

The Mayor encouraged Lambeth to set out the ability of the remaining industrial land to accommodate more industrial floorspace in accordance with paragraph 6.4.10 of the Intend to Publish London Plan. With regards to Table 4 of the Policies Map it is unclear if the intensification of these KIBAs is expected to deliver additional industrial capacity or simply to allow co-location with residential development. This clearly suggests any positive aspiration for investment in new employment space lacks clarity or is lacking entirely.

The changes included within SD17a at the request of the GLA fail to recognise the presence of significant B1 (a, b and c) space within the KIBAs. By making the changes proposed, which delete B1 business space entirely, the policies effectively prevent redevelopment that seeks to enhance such space where it exists.

By seeking to drive existing and new office uses to prime town centre locations, the policies will effectively reduce available B1 accommodation and increase the cost of accommodation, as by definition land costs and rents in town centre locations carry a market premium.

Many SMEs in Boroughs such as Lambeth exist in secondary and tertiary business locations which command more cost-effective rents. This is particularly so of start-ups. They perhaps put up with sub-standard accommodation because of the economic driver. The challenge in these locations is improving the quality of the accommodation to better meet business needs, increase productivity and efficiency and environmental performance, but within the market range for the area. In effect this means working within the relevant rental ceiling commanded by the location, in order to achieve development in a viable manner.

The approach also fails to address the new use classes introduced by the Government which effectively combine B1 uses with A class and D class uses into the new commercial use class.

(ii) Is the Plan flexible enough to encourage new and innovative forms of workspace in response to a fast-changing industrial context?

No. The plan does not effectively promote investment in new employment space or the upgrading or redevelopment of existing space.

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In the last 10 years of an employment policy focussed largely on KIBAs and town centres, the Lambeth Commercial Development Pipeline Report 2018/19 (SD14) makes for grim reading. Taking account of all employment development in B class uses, monitoring shows there has been a substantial and consistent net loss of employment floorspace of all types, both within and outside KIBAs. The only major gains in employment floorspace are in the form of offices in key opportunity area locations, such as the Shell Centre, Vauxhall and Albert Embankment and Waterloo.

There was a net loss completed in 18/19, the vast majority office floorspace, -38,311 sqm. There was also a net loss of 413 sqm of B1c (light industrial), 1,250 sqm of B2 (general industrial) and 1,528 sqm of B8 (storage and distribution). There was no completed development involving the B1b (R&D).

As a snapshot for 18/19 Table 4 of the report highlights the lack of any real development occurring within KIBAs that would reflect modernisation of space or new employment provision.

Table 4. Completed Floorspace in KIBAs and Outside KIBAs by Use Class

| Location | Within KIBA | | | Outside KIBA | | | Total | | |
|--------------|-------------|----------|------------|---------------|---------------|----------------|---------------|---------------|----------------|
| | Existing | Gross | Net | Existing | Gross | Net | Existing | Gross | Net |
| B1a | 96 | 0 | -96 | 52,617 | 14,402 | -38,215 | 52,713 | 14,402 | -38,311 |
| B1b | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| B1c | 0 | 0 | 0 | 2,019 | 1,606 | -413 | 2,019 | 1,606 | -413 |
| B2 | 0 | 0 | 0 | 1,250 | 0 | -1,250 | 1,250 | 0 | -1,250 |
| B8 | 0 | 0 | 0 | 1,543 | 15 | -1,528 | 1,543 | 15 | -1,528 |
| Total | 96 | 0 | -96 | 57,429 | 16,023 | -41,406 | 57,525 | 16,023 | -41,502 |

And Table 6 below, shows that geographically in 18/19, large parts of the Borough have seen no significant employment development at all, with a net loss of overall floorspace, a trend that is consistent over the past 10 years.

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Table 6. Completed Floorspace by Ward

| Ward | Gross | | | | | | Net | | | | | |
|-----------------|---------------|----------|-------------|----------|-----------|---------------|----------------|----------|-------------|--------------|--------------|----------------|
| | B1a | B1b | B1c | B2 | B8 | Total | B1a | B1b | B1c | B2 | B8 | Total |
| Bishop's | 528 | 0 | 0 | 0 | 0 | 528 | -4,616 | 0 | 0 | 0 | 0 | -4,616 |
| Brixton Hill | 0 | 0 | 0 | 0 | 0 | 0 | -9,575 | 0 | 0 | -955 | 0 | -10,530 |
| Clapham Common | 64 | 0 | 0 | 0 | 0 | 64 | -103 | 0 | 0 | 0 | 0 | -103 |
| Clapham Town | 0 | 0 | 1040 | 0 | 0 | 1,040 | -874 | 0 | 1,040 | 0 | 0 | 166 |
| Coldharbour | 1296 | 0 | 0 | 0 | 0 | 1,296 | 1,296 | 0 | -1,434 | 0 | 0 | -138 |
| Ferndale | 4217 | 0 | 0 | 0 | 0 | 4,217 | 53 | 0 | 0 | 0 | 0 | 53 |
| Gipsy Hill | 0 | 0 | 0 | 0 | 0 | 0 | -63 | 0 | 0 | 0 | 0 | -63 |
| Herne Hill | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Knight's Hill | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Larkhall | 0 | 0 | 348 | 0 | 0 | 348 | -349 | 0 | 348 | 0 | 0 | -1 |
| Oval | 177 | 0 | 0 | 0 | 0 | 177 | -28 | 0 | 0 | -238 | 0 | -266 |
| Prince's | 7886 | 0 | 218 | 0 | 0 | 8,104 | -24,286 | 0 | -367 | 0 | 0 | -24,653 |
| St. Leonard's | 166 | 0 | 0 | 0 | 0 | 166 | 166 | 0 | 0 | 0 | -496 | -330 |
| Stockwell | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -57 | 0 | -57 |
| Streatham Hill | 68 | 0 | 0 | 0 | 15 | 83 | 68 | 0 | 0 | 0 | 15 | 83 |
| Streatham South | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Streatham Wells | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Thornton | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Thurlow Park | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,047 | -1,047 |
| Tulse Hill | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Vassall | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 14,402 | 0 | 1606 | 0 | 15 | 16,023 | -38,311 | 0 | -413 | -1250 | -1528 | -41,502 |

Aside from the high-profile developments in the north of the Borough, which are predominantly office dominated, the monitoring shows a general picture of stagnation in investment and a net loss in the stock of employment space and buildings.

Table 7 demonstrates that 18/19 is not an exception and this gradual loss and general lack of net new employment development has occurred consistently over the last 10 years. The gross floorspace developed for B1b and c, B2 and B8 uses, irrespective of losses, indicates very limited activity.

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Table 7. Rolling Annual Summary of Completed Floorspace by Use Class

| Year | B1a | | | B1b | | | B1c | | |
|--------------|----------------|----------------|-----------------|---------------|---------------|----------------|----------------|----------------|-----------------|
| | Existing | Gross | Net | Existing | Gross | Net | Existing | Gross | Net |
| 2009/10 | 36,013 | 26,330 | -9,683 | 393 | 82 | -311 | 2,368 | 1,207 | -1,161 |
| 2010/11 | 19,172 | 11,498 | -7,674 | 100 | 0 | -100 | 1,753 | 0 | -1,753 |
| 2011/12 | 4,742 | 2,585 | -2,157 | 0 | 0 | 0 | 10,211 | 247 | -9,964 |
| 2012/13 | 15,421 | 5,654 | -9,767 | 0 | 0 | 0 | 53 | 228 | 175 |
| 2013/14 | 16,960 | 6,185 | -10,775 | 0 | 0 | 0 | 4,074 | 0 | -4,074 |
| 2014/15 | 31,379 | 3,709 | -27,670 | 0 | 0 | 0 | 1,860 | 731 | -1,129 |
| 2015/16 | 38,655 | 9,864 | -28,791 | 0 | 0 | 0 | 2,414 | 128 | -2,286 |
| 2016/17 | 47,274 | 21,651 | -25,623 | 0 | 1,135 | 1,135 | 210 | 214 | 4 |
| 2017/18 | 18,845 | 28,907 | 10,062 | 0 | 0 | 0 | 7,707 | 0 | -7,707 |
| 2018/19 | 52,713 | 14,402 | -38,311 | 0 | 0 | 0 | 2,019 | 1,606 | -413 |
| Total | 281,174 | 130,785 | -150,389 | 493 | 1,217 | 724 | 32,669 | 4,361 | -28,308 |
| Year | B2 | | | B8 | | | Total | | |
| | Existing | Gross | Net | Existing | Gross | Net | Existing | Gross | Net |
| 2009/10 | 513 | 0 | -513 | 2,508 | 2,965 | 457 | 24,046 | 14,463 | -9,583 |
| 2010/11 | 1,071 | 0 | -1,071 | 14,479 | 1,978 | -12,501 | 30,503 | 4,810 | -25,693 |
| 2011/12 | 2,141 | 0 | -2,141 | 1,744 | 0 | -1,744 | 19,359 | 5,882 | -13,477 |
| 2012/13 | 0 | 268 | 268 | 4,130 | 88 | -4,042 | 25,164 | 6,541 | -18,623 |
| 2013/14 | 401 | 298 | -103 | 10,885 | 2,533 | -8,352 | 32,320 | 9,016 | -23,304 |
| 2014/15 | 1,345 | 0 | -1,345 | 9,091 | 650 | -8,441 | 43,675 | 5,090 | -38,585 |
| 2015/16 | 100 | 529 | 429 | 9,763 | 6,086 | -3,677 | 50,932 | 16,607 | -34,325 |
| 2016/17 | 826 | 50 | -776 | 751 | 0 | -751 | 49,061 | 23,050 | -26,011 |
| 2017/18 | 948 | 0 | -948 | 4,878 | 11,275 | 6,397 | 32,378 | 40,182 | 7,804 |
| 2018/19 | 1,250 | 0 | -1,250 | 1,543 | 15 | -1,528 | 57,525 | 16,023 | -41,502 |
| Total | 8,595 | 1,145 | -7,450 | 59,772 | 25,590 | -34,182 | 364,963 | 141,664 | -223,299 |

The KIBA policy seems more targeted to retain the status quo than stimulate positive investment and change.

At the same time as representing a missed opportunity to grasp the need for innovation and change to reflect the changing economy and work patterns, or grasp the need to improve productivity and the efficient use of employment space, this also fails to address the need for a general improvement in the environmental performance and energy standards of the employment stock. These are also key policy imperatives for the London Plan and NPPF.

The NPPF encourages policy to (para 148) support the transition to a low carbon future in a changing climate. It encourages us to shape places in ways that contribute to radical reductions in greenhouse gas emissions. Plans are required to take a proactive approach to mitigating and adapting to climate change. If the policies of the Local Plan effectively stifle innovation and investment in employment space, it cannot adapt to meet this challenge and deliver a low carbon future.

The Plan should in ED3 provide positively for investment in KIBAs including colocation where this can be achieved in a manner that benefits the quantum and/or quality of employment space alongside the provision of homes and other development to meet the needs of London.

4.2 Offices:

(i) Should policy ED1 be more flexible in relation to allowing development proposals involving a complete loss of floorspace, for example to enable the delivery of improved healthcare facilities?

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There may be circumstances where the planning balance supports the loss of employment floorspace, where the consequences of the loss are limited, comply with other relevant policies and the benefits outweigh such loss.

The policy as drafted is now internally inconsistent in how it treats office redevelopment proposals. With SD17a, it effectively prevents any office development outside of the CAZ, Opportunity Areas and Town Centres large or small. Thus, a proposed redevelopment of older office space on an established site (such as the Lilford Business Centre) would be contrary to policy and not be permitted. However, part c) prevents its loss. This is clearly inconsistent, will not be effective in maintaining or enhancing office stock and is not justified.

If the policy intention is to decant office space into town centres and the north of the Borough, this has major implications for networks of SMEs distributed around the Borough who depend on local trade and connections. It also runs counter to the KIBA policy to date, which contain significant office components and to a sustainable strategy for local employment and mixed uses that reduces the need to travel. However, if that is the policy then the Plan must relax the approach to the loss of office floorspace outside of town centres, the CAZ and Opportunity Areas.

(ii) Is the marketing requirement to demonstrate that there is no demand for offices over a period of at least two years justified and in line with national policy? Why has this been increased from one year?

No. This requirement implies that land and buildings will be sterilised for a longer period of marketing prior to being brought back into beneficial use. There should be other more positive reasons that justify such loss including the enhancement in the quality or nature of the space to be provided.

(iii) Is the 'no net loss' stance critical to Lambeth's local economy or is it unduly restrictive which could get in the way of economic progress in the Borough?

The approach to employment land as noted previously is overly restrictive and prevents investment in employment space that is enabled by the development of other used as part of mixed-use development and colocation. While it is desirable for this to lead to no net loss or in some cases an increase, sometimes the qualitative improvements could justify a net reduction in the area or floorspace of the employment space.

Indeed, it is clear from the monitoring that this has in fact been happening in some limited cases, mainly in the regeneration areas in the north of the Borough where the predominant employment use is office space.

There is no practical planning reason why the same approach should not apply to other forms of employment space throughout the rest of the Borough, indeed this flexibility to invest and innovate is exactly what is required to accord with the emphasis of the Secretary of State and this would then comply with the policies of the NPPF.

4.3 Affordable workspace:

(i) Is policy ED2, which seeks to promote affordable workspaces, sufficiently responsive to sensitive viability considerations, or are there soundness issues with its application, for example in relation to applications for redevelopment and refurbishment of office space?

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The provisions for affordable workspace are limited to the specific areas noted in part a) of the policy and should not be extended beyond these areas. Within these areas, the policy should only apply to net increases in space in order to avoid discouraging renewal of existing stock.

(ii) What is the justification for the proposed rent levels?

The report on the London Plan concluded at para 439 that reference to an appropriate range of market rents should be deleted because, attempting to control the rental levels of market properties is not justified or consistent with national policy. While provision for some affordable space was considered acceptable, in certain circumstances, this needs to be justified on an individual basis and should not be a matter of general application.

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?

The approach to KIBAs is now confused and inconsistent with the NPPF and the Secretary of State's concerns over the Intend to Publish London Plan. It does not appear to recognise the nature and mix of uses within the existing KIBAs or the potential in some KIBAs for colocation and mixed use development to deliver a better quality and quantum of employment space to meet the needs of SMEs.

The approach to KIBAs is based on historical use classes that no longer fit comfortably with a flexible and dynamic economy and the current approach of Government in freeing changes between traditionally separate uses to support investment and growth. As now worded the policy appears to seek to eliminate business uses (which includes B1a, b and c). It appears to seek to reclassify R&D and light industrial as industrial (B2) in a manner directly at odds with the new class E.

It is not clear how the policy can work with the new Class E combining B1 (a, b and c) with A1, A2, A3, D1 and D2 uses given that several KIBAs contain uses that fall within this new class. The policy requires a fundamental review and must become much more flexible towards the nature of employment use and the potential for mixed use redevelopment and colocation.

Even on the basis of the former use classes, there is a clear choice to be made on the approach to be followed.

If ED3 deletes the business element, then the KIBAs should be reassessed to exclude those areas of B1 use.

If ED3 seeks to retain business use, then the policy should embrace the need for flexibility and the potential for positive change to invest in such space. This includes embracing the potential for mixed use development and colocation, which can channel funds into the renewal of employment space where it would otherwise not be viable.

(ii) What is the intention in KIBAs where the majority use is B1? Will further B1 extensions/improvements be acceptable under the new policy?

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The Plan's approach to KIBAs has become increasingly muddled and it is clearly inconsistent with the NPPF and changes to the use classes order. As drafted in SD17a, the proposals mark a fundamental shift in the approach from past policy and that consulted upon. The focus now appears to be entirely on industrial use classes (B2), storage and distribution (B8) and sui generis use and this is not supported by the evidence base which indicates the nature of the differing KIBAs across the Borough.

Planning permission is not required to change between B1a, b or c. KIBAs contain significant B1 accommodation, much of which is in office use with some R&D and light industrial workshops. The 2020 Review of KIBAs (EB24) defines the Lilford Business Centre (Zone 1 on page 39) as a discrete office zone within the Camberwell Trading Estate and adjoining sites. The KIBA is comprised several separate estates served by different accesses and with very different characteristics.

The development proposed by Caddick and Bizspace, would see a renewal and net increase in the present office, light industrial and storage space at the Lilford Business Centre which would simply not occur if the policy restricts uses to industrial, warehousing and waste uses and does not embrace mixed use development. It is not clear what commercial uses the policy embraces or how it would be delivered given the new use class.

There are significant issues with the nature and configuration of the premises at the Lilford Business Centre, arising from the historic configuration and outworn nature of the buildings. Some of these arise from the age of the fabric but others are more fundamental and reflect the depth of the space and lack of natural light, the poor circulation, servicing and lack of defensible space which has led to numerous antisocial behaviour issues. There is no core meeting or coming together space that supports the development of a business hub or community development among occupiers. This presents a sub-optimal environment for employees and businesses, an inefficient use of space and a high rate of occupier churn. They reduce the employment density and productivity of the space and require a high level of ongoing expenditure on heat, light and repairs and maintenance to support what is essentially sub optimal space.

The only way this can be addressed is through the comprehensive redevelopment of the site, made viable by the inclusion of shared living accommodation in the airspace above the site. Present rental levels in this location and the capital cost of policy compliant redevelopment mean that investment for employment use alone is simply not viable.

At Annex 1 are limited extracts of the initial pre-application submission made to GLA and Lambeth for the redevelopment of the site. This proposed to increase the extent and quality of workspace including a mix of light industrial, workshop space, with a range of office and studio spaces over two floors, with a central courtyard, reception, café, training and meeting hub. The units are designed to provide light open interiors at a range of sizes and configurations that are optimal for flexible, adaptable, occupier demand. This was designed to meet GLA industrial specifications with high floor to ceiling heights, energy efficient design and clear servicing space. It would also deliver 250 dwellings as shared living accommodation above the employment space described in relation to Matter 3. The initial responses from Lambeth and GLA were supportive of the strong design concept and the accommodation provided, subject to detailed design considerations, but save for the key, in principle, KIBA based policy objection to the colocation of a residential use as the catalyst for change and the fact that the proposals were not identified through the local Plan process.

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This is entirely illogical. That a proposal can provide substantial enhancement in the quantum and quality of employment space, enabling higher employment density and productivity, reduce churn and promote strong business community hub, while also providing 250 new shared living homes and still be considered contrary to policy. There is no substantive harm and the underlying objectives of both national and local employment and housing policy is met.

(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?

ED3 is directly at odds with the Secretary of State's letter and the policies of the NPPF. The letter essentially seeks additional measures to provide flexibility in the redevelopment of existing employment areas to maximise the potential for the delivery of the new housing London needs. This is not a requirement simply of GLA, it is a requirement that passes on to individual Boroughs.

It is fundamentally necessary to minimise the need for Green Belt release and pressure on MOL. He makes clear this means increased density and making best use of brownfield and underutilised land.

The housing crisis is pressing, and the Secretary of State seeks action now to bridge the gap between the 52,000 homes of the ITP London Plan and the 66,000 needed as a minimum. He makes clear that the cumbersome and complex restrictions on development means that *'in aggregate this approach is inconsistent with the pro-development stance we should be taking and ultimately only serves to make Londoners worse off'*.

The Secretary of States conclusion is that *'the necessary decisions to bring more land into the planning system have not been taken, the added complexity will reduce appetite for development further and slow down the system, and throughout the Plan you have directly contradicted national policy. As you know, by law you must have regard to the need for your strategies to be consistent with national policies.'*

He requires changes to ensure the identified need is met by this London Plan and that an immediate review is started to ensure that the higher level of needs identified by many can be met in future. In this context it is simply not consistent with this requirement to maintain the status quo in terms of policy restrictions.

This criticism applies in equal measure to policy ED3. It is equally important the application of the policy.

Given also that the housing targets in Lambeth are a direct reflection of the identified capacity, which reflects the policy constraints imposed on the release of employment land, this must require a reconsideration of those policy constraints in order to free additional capacity and allow more homes to be built.

The Secretary of State could not have been clearer that this is a responsibility that passes to the Boroughs. He commented on the over-restrictive stance that hinder the ability to choose more optimal uses for industrial sites where housing is in high demand and advised *'I am directing you to take a more proportionate stance - removing the 'no net loss' requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply'*

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(iv) Is the policy unduly restrictive to the principle of mixed-use development and co-location, which is promoted in national policy?

Para 118 of the NPPF clearly requires plan policies to encourage mixed use schemes in the redevelopment of land, taking the opportunities to achieve net environmental (and economic) gains. The policy gives substantial weight to the value of using suitable brownfield land for homes and other needs.

It specifically requires policies to promote the development of under-utilised land and buildings, especially for housing where land supply is constrained and where available sites could be used more effectively including above existing employment uses. This clearly applies here.

Moreover, the NPPF requires policy to be proactive and support opportunities to use the airspace above existing commercial premises for new homes.

It also requires (para 120-121) policies to reflect changes in the demand for land, especially where that can help to address identified needs and make for a more efficient use of land in urban areas.

LP 6.5.3 Innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan review

In London especially, the provision of homes, employment space and other services as part of integrated developments helps to promote efficient land use and reduce the need for travel. It helps the process of localisation, providing jobs and services close to where people live, something that has become ever more important in 2020 due to Covid-19. It is an essential part of a resilient economy.

ED3 is essentially a restrictive policy, preventing development in the majority of cases unless specifically identified for mixed use development in part c). It is not pro-active as required by the ITP London Plan E7 which promotes consideration of intensification and colocation in parts A and B.

Our representations noted the review of KIBAs on which the Draft Plan relies is inconsistent and does not provide any clear indication of why intensification and colocation is not appropriate in each case. The assessment of the Camberwell Trading Estate identifies 5 distinct parts to the KIBA, each with their own character and independent access. Zone 1, the Lilford Business is characterised in the assessment as a two-storey office building fronting Lilford Road. The accesses are narrow and unsuited to large vehicles. Lilford Road is constrained by a height restricted railway line immediately to the east and is residential in nature. The implication is clear that this is not a suitable industrial location that could accommodate waste, manufacturing or other general industrial or distribution uses.

The assessment considers levels of occupation but does not consider suitability of the premises for the uses, their condition or the potential for redevelopment or use of the existing airspace. It cannot, therefore, form a reasonable basis on which exclude the potential for colocation or intensification. It is seriously flawed. Our view, based on a detailed knowledge of the buildings and their management, occupation and use, is that there is significant scope to better reflect business needs, to improve the quality and the quantity of employment space. Intensification and colocation can offer a significant enhancement in the employment potential and productivity of the site and, given the clear differences between the zones within the KIBA, would have no adverse 'agent of change' impact on the other estates forming the wider KIBA.

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4.5 Non-designated industrial sites;

(i) Given that many of these industrial uses are located in close proximity to housing uses, should there be a reference in policy ED4 to the Agent of Change principle in the interests of safeguarding neighbouring residential living conditions?

The agent of change principle is established in the ITP London Plan and would apply in all cases of colocation and mixed use redevelopment to ensure that adequate standards are in place to avoid prejudice arising from noise, vibration or other impacts.

(ii) On the other hand, how does the policy work where recently introduced residential development is located next door to an existing industrial use, which then wishes to expand/improve/redevelop?

Given the above, the careful design of residential forms of development in conjunction with employment uses and neighbouring uses should take account of the need for effective masterplanning to ensure as far as practicable that future redevelopment or expansion potential is not constrained. This can be achieved by orientation of buildings and accommodation/windows, effective acoustic and other attenuation and where necessary, setting sensitive uses back from common boundaries.

These are all becoming established techniques accepted by GLA and other London Boroughs where colocation for a range of B class uses is becoming established as an effective means of achieving investment in employment space and new forms of housing.

4.9 Employment and training: Policy E15 seeks to maximise local employment opportunities through a number of measures, including a requirement for a minimum of 25% of all jobs created by a development proposal (in both the construction phase and for the first two years of end-use occupation of the development) to be secured for local residents. Is this policy justified, is it in accord with the London Plan and national policy and is it enforceable, i.e. effective?

We support the provision of training and job opportunities for the local community and are committed to using reasonable means to facilitating local employment and training wherever possible. We are actively engaging with local technical colleges and stakeholders to explore ways in which this can be achieved alongside the development proposed by Caddick and Bizspace.

While the principle of encouraging training for the local community in new employment development is supported and has been a feature in the construction stage for some time, we do have some concerns over the practicality of imposing a requirement on developers to secure 25% of jobs through the Council for local residents. This is likely to impose an unreasonable expectation on developers and premises owners or managers, to impose such restrictions on incoming tenants.

The clarification that this applies to net new jobs is helpful in avoiding issues where existing employers and tenants return as part of a decant strategy or similar, it still imposes an obligation that developers and owners will find difficult to enforce on occupiers.

In some cases the new accommodation provided will simply allow more local firms to move into the premises or encourage firms to relocate to the area. In both cases there are clear advantages for Lambeth and for those businesses who can be retained and grow. In such cases we are unclear how the obligations would be applied and hence would question how justified or effective they would be.