

# **Topic Paper 1 - Town Centres**

**October 2018**



## Contents

Executive summary .....	<b>Error! Bookmark not defined.</b>
Future retail capacity in Lambeth .....	5
Overview of policy context .....	5
Evidence base .....	5
Draft Revised Lambeth Local Plan .....	6
Town centre hierarchy.....	7
Overview of policy context .....	7
Draft Revised Lambeth Local Plan .....	8
Waterloo and Southbank Metropolitan Centre .....	8
Herne Hill District Centre.....	9
Town centre boundaries.....	10
Overview of policy context .....	10
Draft Revised Lambeth Local Plan .....	10
Partial de-designation of West Norwood District Centre .....	10
De-designation of Poynders Road Local Centre and designation of new Kings Avenue Local Centre.....	13
Extension to Loughborough Junction Local Centre.....	15
Partial de-designation of Kennington Park Road/ Kennington Road Local Centre .....	21
Partial de-designation of Clapham High Street District Centre.....	22
Streatham Major Centre .....	22
Approach to managing ground floor uses in town centres.....	24
Brixton .....	24
Overview of policy context .....	24
Permitted development rights .....	<b>Error! Bookmark not defined.</b>
Issues consultation .....	26
Evidence base .....	27
Draft Revised Lambeth Local Plan .....	29
Streatham .....	31
Overview of policy context .....	32
Issues consultation .....	32
Evidence base .....	33
Draft Revised Lambeth Local Plan .....	34

Betting shops and payday loan shops .....	34
Creative Enterprise Zones.....	35
Overview of policy context .....	35
Evidence base .....	36
Draft Revised Lambeth Local Plan .....	36
Brixton CEZ.....	36
West Norwood CEZ .....	37
Public houses .....	39
Overview of policy context .....	39
Permitted development rights .....	40
Issues consultation .....	40
Draft Revised Lambeth Local Plan .....	40

## Executive summary

This topic paper explains the rationale behind the proposed policy approaches for town centres in the Draft Revised Lambeth Local Plan. For each policy area, the topic paper provides an overview of the existing policy context, the evidence base, feedback from the Issues consultation and the proposed way forward in 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 proposed identification of Waterloo and South Bank as a metropolitan town centre (subject to agreement by the Mayor) and the promotion of Herne Hill as a district centre in the London Plan.

### **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 five town centres: West Norwood (district), Clapham High Street (district), Clapham Park (local), Loughborough Junction (local) and Kennington Park Road/Kennington Road (local). It also explains the proposed approach to Streatham major centre and its primary shopping areas.

### **Managing ground floor 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 and retail uses in Streatham.

### **Creative Enterprise Zones**

Creative Enterprise Zones (CEZs) are an initiative by the Mayor of London to designate small areas of London where creative activity is supported. This section sets out the rationale for the proposed designation of a Brixton CEZ and West Norwood CEZ.

## **Public houses**

Over recent years many pubs in Lambeth have been lost to alternative uses, or have closed and are currently vacant. This section summarises the minor changes to the Local Plan policy on public houses in response to changes to permitted development rights and the Draft London Plan 2017 (as amended August 2018).

## 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.

### Overview of policy context

#### National Planning Policy Framework 2018

- 1.2. The 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).
- 1.3. 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

- 1.4. Policy E9 of the Draft London Plan 2017 (as amended August 2018) 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)

- 1.5. The GLA commissioned evidence to identify the need for comparison retail floorspace to support the Draft London Plan 2017 (as amended August 2018). 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.
- 1.6. 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.

- 1.7. 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**

- 1.8. Taking account of the GLA's evidence of need for additional comparison floor space in Lambeth and the 'town centre first' principle of the NPPF, Draft Revised Lambeth Local Plan policy ED7 plans for development in town centres to provide up to 800m<sup>2</sup> of net additional comparison retail floorspace up to 2041. This figure is rounded up from the need identified in figure 98 of the GLA's evidence base..

## Town centre hierarchy

- 2.1. This section summarises the justification for changes to Lambeth’s town centre hierarchy. This includes the proposed identification of Waterloo and South Bank as a metropolitan town centre and the promotion of Herne Hill as a district centre in the London Plan.

### Overview of policy context

#### National Planning Policy Framework 2018

- 2.2. 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

- 2.3. 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 2017 (as amended August 2018) classifies different types of town centres 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.

- 2.4. 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.

#### Lambeth Local Plan 2015

- 2.5. Appendix 3 of the Lambeth Local Plan sets out Lambeth's existing town centre hierarchy. This includes two major centres, seven district centres and 41 local centres.

### **Draft Revised Lambeth Local Plan October 2018**

#### Waterloo and Southbank Metropolitan Centre

- 2.6. The Draft Revised Lambeth Local Plan proposes Waterloo and South Bank as a metropolitan town centre. This recognises, that in the view of Lambeth Council, Waterloo and South Bank area serves a greater role in the London-wide town centre network than its current designation and should be designated as a metropolitan town centre. For this change to be made it would need to be accepted by the Mayor in the new London Plan. Lambeth intends to make the case for this change through the Draft London Plan examination process and further justification will be prepared to support this.
- 2.7. The Waterloo and South Bank area is located within the Central Activities Zone (CAZ). Lower Marsh/The Cut is already recognised as a CAZ retail cluster in the London Plan.
- 2.8. Policy PN1(c) in the Draft Revised Lambeth Local Plan proposes that metropolitan town centre designation will help enable Waterloo and South Bank compete effectively and secure significant inward investment for the

benefit of the local community. It also recognises the continued importance of Lower Marsh/The Cut for local needs and specialist independent retailing and proposes no change to its separate CAZ retail frontage ('cluster') status. The policy proposes to continue with requiring 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 proposes 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.

### Herne Hill District Centre

- 2.9. Herne Hill is an area located across the Lambeth and Southwark boundary. It is identified as a district centre in the Lambeth Local Plan 2015 and is also recognised as a district centre in the Southwark Local Plan. Across both parts in Lambeth and Southwark, the town centre contains 130 retail/service units. In the Lambeth part of the town centre, there is over 2,700 sqm of floorspace (excluding B1a), with an increase of 135sqm of floorspace since 2016.
- 2.10. Although both boroughs identify Herne Hill as a district centre in their current Local Plans, it has not previously been recognised as a district centre in the London Plan. As part of its consultation response to the Draft London Plan 2017, Lambeth recommended that Herne Hill be identified as a district centre in the new London Plan. The Mayor published Minor Suggested Changes to the Draft London Plan in August 2018. These changes include recognising Herne Hill as a district centre.

## Town centre boundaries

- 3.1. This section summarises the proposed changes to five town centres: West Norwood (district), Clapham High Street (district), Clapham Park (local), Loughborough Junction (local) and Kennington Park Road/Kennington Road (local). It also explains the proposed approach to Streatham major centre and its primary shopping areas.

### Overview of policy context

#### National Planning Policy Framework 2018

- 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.

#### London Plan

- 3.3. Policy SD7 of the Draft London Plan 2017 (as amended August 2018) 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.

### Draft Revised Lambeth Local Plan

- 3.4. The Issues consultation 2017 asked stakeholders their views on eight specific questions relating to town centres and one of these questions related to proposed boundary changes to four town centres: West Norwood, Clapham Park, Loughborough Junction and Kennington Park/Kennington Road. The Issues consultation also asked for stakeholders' views on whether the boundary of Streatham town centre and its primary shopping areas should be amended.

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

- 3.5. The Issues consultation proposed to de-designate the length of Norwood High Street south of the railway line down to Rothschild Road from the boundary of West Norwood District Centre (see map 3.1 of the Proposed Changes to the Policies Map). This area is outside of the Primary Shopping Area. The existing local town centre at Norwood High Street/Chapel Road would not be affected and would remain unchanged.

- 3.6. The West Norwood and Tulse Hill Manual for Delivery 2017 is a document 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 levels of demand and vitality. In the context of changing shopping habits and shrinking demand for retail floorspace, it is 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.
- 3.7. This part of the High Street is instead proposed to be designated as a Creative Enterprise Zone, which is a new policy designation allowed for in the Draft London Plan 2017. Draft Revised Lambeth Local Plan Policy PN7 West Norwood uses this proposed designation to support investment in and renewal of spaces appropriate for creative and digital enterprises, to encourage a range of businesses such as makers, artists and designers to locate in this area. The policy supports mixed use development with ground floor B class workspace and potential residential uses on upper floors, so long as the uses complement the adjacent KIBA. It also allows for ancillary sales or display space or meeting spaces. Ground floor A class uses (shops and restaurants) would no longer be supported in this location as this would now be outside the town centre: they would instead be encouraged to locate within the adjacent town centre.
- 3.8. The Manual for Delivery suggested that that this 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 will 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. Further information on the proposed CEZ designation can be found in section 5.
- 3.9. The Issues consultation proposed the de-designation from the town centre but did not, at that stage, proposed the new CEZ designation. A total of five responses were received during the Issues consultation on the proposed de-designation, as set out in the table below. Taking into account the Issues

consultation feedback, the Draft Revised Lambeth Local Plan Proposed changes to the Policies Map October 2018 proposes to continue to de-designate this part of Norwood High Street from the town centre. This will help support the rest of the town centre by consolidating retail uses, which is supported by the NPPF that requires a positive strategy for the future of a town centre.

Respondent	Summary of comments	Response
Member of public	Agree as long as local residents aren't negatively affected by increased traffic.	Comment noted.
Member of public	Looks interesting.	Comment noted.
Member of public	Anything that can have a positive impact on the new designated area of West Norwood (the most depressed and depressing part of the town) is to be welcomed.	The CEZ designation seeks to encourage a wider mix of uses in the area, including creative, digital and artistic activity.
Member of Norwood Planning Assembly	This may not be a positive move. The soon to open cinema and refurbished theatre will encourage more activity along Norwood High Street. The council should do more to encourage a diversity of uses including retail, cultural, office, bars and restaurants in this area.	The CEZ designation seeks to encourage a wider mix of uses in the area, including creative, digital and artistic activity. The de-designation of this part of the town centre is intended to help consolidate town centre uses in the remainder of the town centre, which will in turn contribute to sustaining its vitality and viability in the context of changing patterns of shopping behaviour.
Member of public	Don't include SE27 0BY West Norwood.	The postcode is outside of the area proposed for de-designation.

Proposed de-designation of Poynders Road Local Centre and proposed designation of new King’s Avenue Local Centre

- 3.10. The Issues consultation proposed to de-designate the Poynders Road local centre. It would be replaced by a new local centre on King’s Avenue (see map 3.3 of the Proposed Changes to the Policies Map).
- 3.11. 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 Kings 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.
- 3.12. A total of five responses were received during the Issues consultation on the proposed de-designation, as set out in the table below. The Draft Revised Lambeth Local Plan proposes to continue with the de-designation of the Poynders Road local centre and the designation of a new local centre on Kings Avenue. The relocation of the local centre will support delivery of the wider objectives of the 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.

Respondent	Summary of comments	Response
Members of Clapham Park Forum	No particular concerns as attendees at the meeting recognised that they were all young, able-bodied and willing to travel.	Comment noted.
Clapham Park Project	Many people currently use the café for meeting up socially and it’s the only one in the west side of the estate. The current shops including the post office, the greengrocers, the chemist, the handyman shop and the Londis all provide essential services for the group of older and	Comment noted. This was considered as part of the planning application and the location of the proposed new local centre was considered acceptable.

Respondent	Summary of comments	Response
	<p>vulnerable residents, many of whom have mobility problems and have to use a stick or stroller to get around. They are concerned about not being able to draw out their pension or pay rent and bills when the post office shuts. Although they know they can go to another branch, this will involve getting on public transport, which often involves a long wait and a challenge to get on the bus. A few of the elderly were extremely worried that if they cannot travel to another post office to pay their rent, they will be evicted. None of the group have IT skills or access to IT. For some, walking from Clarence avenue, Clarence Crescent or even the newish blocks (Fairbourne Road and Dragmore), to the proposed new local centre on Kings Avenue will be a challenge because of roads have been closed due to building works.</p>	
<p>The Streatham Society</p>	<p>The new Clapham Park local centre needs to be backed up with a strategy for safe pedestrian crossings of King's Avenue and design needs to preserve the green boulevard aspect of Kings Avenue despite higher pedestrian footfall.</p>	<p>Comment noted. This was considered as part of the planning application and will be addressed through associated highway works.</p>
<p>Member of the public</p>	<p>Support as long as the range of businesses currently on Poynders</p>	<p>Planning conditions were used in the planning application</p>

Respondent	Summary of comments	Response
	Road are maintained - bakery, hardware store, fish and chips shop.	to ensure an appropriate mix of uses in the new local centre.
Member of public	Not enough information is given about the actual effect of the proposed changes to Kings Avenue. More should be published.	Comment noted.

### Extension to Loughborough Junction Local Centre

- 3.13. The Issues consultation proposed to extend the boundary of Loughborough Junction local centre. This consisted of an extension to include part of Rathgar Road and an extension to the south of Coldharbour Lane.
- 3.14. 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.
- 3.15. The proposed inclusion of Rathgar Road was in response to the emerging 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.
- 3.16. A total of 11 comments were received on the proposed extension to the Loughborough Junction local centre as set out in the table below. Taking into account the comments received during the Issues consultation, the proposed extension to the local centre in the Draft Revised Lambeth Local Plan does not include Rathgar Road (see map 3.2 in the Proposed Changes to the Policies Map document). It is considered that, although there have 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. In addition there are 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.
- 3.17. Policy PN10 of the Draft Revised Lambeth Local Plan instead proposes a specific policy approach to Rathgar Road that acknowledges 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 sets out a range of other considerations should such a comprehensive proposal come forward.

- 3.18. The Draft Revised Lambeth Local Plan proposes to continue with the proposed extension to the south of Coldharbour Lane but this now includes 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.

Respondent	Summary of comments	Response
Loughborough Junction Neighbourhood Planning Forum	Broadly in favour with proposals, including the introduction of new uses to the arches along Rathgar Road. However concerned that new uses in Rathgar Road could lead to the development of nuisance night- time economy and it seeks reassurance that curbs could be placed on new uses to ensure this did not happen. Also concerned that existing businesses would be relocated in empty neighbouring arches at the same rent.	Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan proposes a specific policy approach to Rathgar Road to ensure a comprehensive refurbishment of the arches with a mix of uses that complement the local centre. The policy also requires support for and engagement with existing tenants.
Network Rail	Support the proposed extension as it will support the principles of the draft Loughborough Junction Action Plan. Specifically the inclusion of Rathgar Road will assist in providing additional and a unique space for additional	Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan proposes a specific policy approach to

Respondent	Summary of comments	Response
	town centre uses in a small cluster away from the main Coldharbour Lane centre. This will also support a new route through one of the arches to improve links from Loughborough Estate to the rail station.	Rathgar Road to ensure a comprehensive refurbishment of the arches with a mix of uses that complement the local centre. The policy also requires support for and engagement with existing tenants.
Member of the public	Supports the Loughborough Junction Forum response.	Comment noted.
Member of the public	Supports and recommends the railway arches at the junction of Coldharbour Lane and Herne Hill Road to the Padfield road side are included also to ensure that the frontage is continuous.	The proposed extension to the local centre now includes a continuous frontage up to Padfield Road.
Member of the public	Loughborough Junction looks sensible.	Comment noted.
Member of the public	Supports Loughborough Junction – more shops are needed.	Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan proposes a specific policy approach to Rathgar Road to ensure a comprehensive refurbishment of the arches with a mix of uses that complement the local centre.

Respondent	Summary of comments	Response
Loughborough Junction Action Group	<p>Broadly in favour of the boundary changes including the introduction of new uses to the arches along Rathgar Road in order to improve the range of shops, restaurants and cafes in the town centre and to improve connections between parts of the Loughborough Estate and Loughborough Junction station. Extension of the town centre to the frontages along Coldharbour Lane between Hinton Road and Herne Hill is supported but would like to see this extended to the railway arches on the northern section of Herne Hill Road to provide continuous town centre frontage round Coldharbour Lane to Padfield Road. One major concern is the frontage to LJ Works, the new affordable workspace project funded by the GLA and Lambeth. Understand it is a KIBA but would arguing its uses are likely to include many start up food and clothing/fashion businesses that benefit from a small amount of retail/café space taking up a small area at the front of the site. This would animate both Loughborough Road, increasing public awareness of the project and provide a commercial outlet for the businesses operating from LJ Works. Argues that this would not</p>	<p>Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan proposes a specific policy approach to Rathgar Road to ensure a comprehensive refurbishment of the arches with a mix of uses that complement the local centre. The policy also requires support for and engagement with existing tenants.</p> <p>The proposed extension to the local centre now includes a continuous frontage up to Padfield Road.</p>

Respondent	Summary of comments	Response
	<p>be large scale retail and would be ancillary to and providing for the needs of the KIBA. Concern that businesses could be displaced from Rathgar Road once it becomes part of the Loughborough Junction Town Centre. Want reassurance that existing businesses could remain or be relocated in empty neighbouring arches at the same rent.</p>	
<p>Indigo on behalf of St Clair Developments</p>	<p>Strongly object. The current Coldharbour Lane frontage is appropriate as it sees footfall from the nearby rail station, but Hinton Road is not able to suitably support retail as any shop would be isolated away from the main commercial route. The Hinton Road Frontage, whether used for residential access or business floorspace, can still be designed as an active and dynamic frontage without imposing undue restrictions.</p>	<p>The proposed extension will help make the centre more coherent with a continuous shopping frontage on both sides of the road.</p>
<p>Member of the public</p>	<p>The Loughborough Junction town centre extensions are welcome, but public realm improvements will be needed to reduce litter, improve cleaning and reduce traffic flow if it is to be a truly effective town centre.</p>	<p>Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan proposes a specific policy approach to Rathgar Road to ensure a comprehensive refurbishment of the arches with a</p>

Respondent	Summary of comments	Response
		<p>mix of uses that complement the local centre and public realm improvements. The policy also requires support for and engagement with existing tenants.</p> <p>The proposed extension to the local centre now includes a continuous frontage up to Padfield Road.</p>
<p>Member of the public</p>	<p>Concerned that existing business in Rathgar road could be pushed out. There are quite a lot of take-aways on Coldharbour lane. Loughborough Junction is not short of places to get food. Concerned that changing the uses of arches in Rathgar road could impact on residents living next to these arches.</p>	<p>Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan proposes a specific policy approach to Rathgar Road to ensure a comprehensive refurbishment of the arches with a mix of uses that complement the local centre and public realm improvements. The policy also requires support for and engagement with existing tenants.</p>
<p>Member of the public</p>	<p>The Loughborough Junction scheme isn't working, unless Loughborough Junction station has a new western entry point. If it doesn't people will still have to go</p>	<p>Rathgar Road is no longer proposed to be included in the local centre. Policy PN10 of the Draft Revised Lambeth Local Plan</p>

Respondent	Summary of comments	Response
	on to Coldharbour Lane and under the railway bridge to get into the station from the current eastern entrance. Also against existing metal-bashing/car repair businesses being cleared out for restaurants and bars. Questioned how such developments would affect the restaurant next to the Maid of Switzerland.	proposes a specific policy approach to Rathgar Road to ensure a comprehensive refurbishment of the arches with a mix of uses that complement the local centre and public realm improvements. The policy also requires support for and engagement with existing tenants

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

- 3.19. The Issues consultation proposed to de-designate part of the Kennington Park Road/Kennington. A total of two comments were received on the proposal as set out in the table below. It is proposed to continue with this de-designation in the Draft Revised Lambeth Local Plan (see map 3.4 of the Proposed Changes to the Policies Map).
- 3.20. The rationale for the de-designation is that part of the Stannary Street Key Industrial and Business Area (KIBA) currently overlaps part of the local centre designation to the north of Kennington Road. This means there is a conflict between the two designations and removing this part of the local centre would resolve this issue. 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.

Respondent	Summary of comments	Response
Member of the public	No objection to the proposed change	Comment noted.
Member of the public	The builder's merchant on Kennington Park Road is more retail than employment in nature. Suggest that this remains in the town centre.	The part of this business that is retail in nature remains within the town centre.

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

3.21. In addition to the four proposed changes set out above, the draft revised Local Plan proposes to de-designate a small area from Clapham High Street district centre (see Appendix 1). It is proposed to de-designate 11-13 Edgeley Road 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 an appropriate location for a ground floor active frontage should this site be redeveloped.

### Streatham Major Centre

3.22. Streatham is one of Lambeth's major town centres and has two primary shopping areas. 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 felt 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.

3.23. 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.

3.24. A consultation workshop was also held 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 area 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 Gleneage 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.

3.25. It is proposed to make no change to the current major town centre and primary shopping areas boundaries for Streatham in the Draft Revised Local Plan October 2018. However, see also paragraphs 5.35 and 5.36 on a proposed change to policy on the proportion of A1 units in Streatham’s primary shopping area.

## Approach to managing ground floor uses in town centres

- 4.1. This section sets out the justification for changes to policies that manage the mix of uses within town centres. This includes night-time economy uses in Brixton, retail in Streatham and betting shops and payday loan shops.

### **Brixton**

- 4.2. The Draft Revised Lambeth Local Plan introduces a new policy to help promote and manage the evening and night-time economy in Brixton. This section provides a summary of the policy context, the evidence base and the proposed policy.
- 4.3. For the purposes of this policy, A3, A4 and A5 uses are considered to be evening and night-time economy uses. Nightclubs are a sui generis use that is also considered an evening and night-time economy use.
- 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) including drinking establishments with expanded food provision.
  - A5 uses – defined as ‘hot food takeaways’ - for the sale of hot food for consumption off the premises.

### **Overview of policy context**

#### London Plan

- 4.4. The Draft London Plan 2017 (as amended August 2018) 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.

- 4.5. Policy HC6 of the Draft London Plan 2017 (as amended August 2018) states that boroughs should develop a vision for the night-time economy and that Local Plans should promote the night-time economy where appropriate, diversify the range of night-time activities and address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution and health and wellbeing for residents and seek ways to diversify and manage these areas. 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 the police, local businesses, patrons, workers and residents.
- 4.6. In addition, Policy E9 of the Draft London Plan 2017 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 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
- 4.7. The Draft London Plan 2017 also 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 and areas with more than local significance. Brixton is identified as having a night-time economy of regional or sub-regional significance.

#### Lambeth Local Plan 2015

- 4.8. The Lambeth Local Plan 2015 policy ED7 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. In relation to Brixton, current Local Plan policy PN3 seeks to

manage the mix of uses within the town centre. Within the primary shopping area, the policy limits food and drink uses (A3, A4 and A5 uses) 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.

- 4.9. 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).
- 4.10. Outside the primary shopping area and the indoor markets there are no policy restrictions on the mix of uses, with the policy requiring that ground floor uses should be in A, D or B1 uses classes.

### **Issues consultation**

- 4.11. The Issues consultation 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.
- 4.12. 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.

## Evidence base

### *Evening and night-time economy uses*

- 4.13. A range of data sources have been analysed to understand the current mix of uses and the proportion of ground floor units in use as an evening or night-time economy use in Brixton.
- 4.14. Each year the council commissions Experian Goad data for the six largest town centres in Lambeth, which provides information on the use of each ground floor unit in the centre and whether or not it is vacant. The most recent Goad data for Brixton is June 2017. The GLA's Town Centre Health Check 2016 provides aggregated Goad data on the number of units within each class for Brixton. In addition to the Goad data, officers undertook a survey in March 2018 of Coldharbour Lane and Atlantic Road and compared this survey data with the planning history of these units to better understand the mix of uses and the permitted uses in this area.
- 4.15. The table below sets out the proportion of units both inside and outside of Brixton's primary shopping area that are in an evening or night-time economy use.

Evening and night-time economy use class counts and proportions (source: Goad, 2017; survey data 2018)

Area of Brixton	Total number of units	Units in A3/A4/A5 use/sui generis nightclub	Proportion (%) in A3/A4/A5 use
Primary Shopping Area	210	34	16.2
Non-Primary Shopping Area	248	65	26.2

- 4.16. The data shows that there is a higher proportion of evening and night-time economy uses outside of the primary shopping area. This data was mapped and found that the highest concentrations of these uses are on Coldharbour Lane and the southern section of Atlantic Road (Appendix 2). Further survey work was undertaken of this area to better understand any clustering of these uses.

Use counts and proportions in survey area (source: survey data March 2018)

Use	Count	Sum	Proportion
A1	52		
A1/A2 (flexible permission)	3		

A1/SG	2		
A2	5		
A1/A3 (flexible permission)	1	48	38.1%
A3	27		
A3/A4 (flexible permission)	6		
A4	9		
A5	5		
B1	2		
C1	2		
C3	4		
D1	3		
D2	1		
Sui generis	4		
Total	126		

4.17. While the majority of the units in this area are in A1 use, a significant proportion are in A3 or A4 use. In total, 39% of units in this area, are in A3, A4, A5 or sui generis (night club) use.

4.18. The proportion of night time economy uses in the 120 units outside of the primary shopping area and outside of the detailed survey area has also been assessed. The majority of these units are in A1 use (43%) with 15% in A3, A4, A5 or sui generis night club use. A particular concentration of units in night-time economy use exists on the north side of Acre Lane.

Use class counts and proportions in non-PSA outside survey area (source: Goad, 2017; survey data 2018)

Use	Count	NTE	NTE %
A1	51		
A2	9		
A3	12	17	14.2%
A4	2		
A5	3		
B1	14		
B2	3		
B8	2		
C3	5		
D1	5		
D2	3		
SG	11		
	120		

4.19. Overall, there are concentrations and clusters of night-time economy uses within the town centre. The table below sets out the proportion of units within

the primary shopping area and the more detailed survey area that are in night-time economy uses. It also sets out the proportion of units outside of the primary shopping area but within the town centre that are in these uses.

Breakdown of night-time economy uses across within Brixton

Area	Units	Total	NTE Units	NTE %
Primary Shopping Area	All units	210	34	16.2
Survey Area	All units	126	49	38.9
	Non-PSA units	116	46	39.7
Outside of Primary Shopping Area	All units	248	65	26.2
	Units outside survey area	120	18	15.0

**Draft Revised Lambeth Local Plan October 2018**

4.20. The Draft Revised Lambeth Local Plan must recognise the important role of night-time economies in economic growth and regeneration. However, it must also ensure that these uses are carefully managed to reduce any potential negative impacts, particularly on local residents. Given the concentration and clustering of night-time economy uses on Acre Lane, Coldharbour Lane and Atlantic Road, the Draft Revised Lambeth Local Plan proposes an ‘evening economy management zone’ to support the growth and diversification of the evening and night-time economy whilst managing its impact on local residents and the local environment for units outside of the primary shopping area (see Appendix 2).

4.21. Within the evening economy management zone, the proposed PN3(c) policy approach is as follows:

- The proportion of A3, A4, A5 and nightclubs should not exceed 40 per cent, taking account of unimplemented planning permissions for change of use.
- No more than 3 in 5 consecutive ground floor units should be in A3, A4, A5 and nightclubs to prevent clustering of these uses.
- No more bars (A4) will be permitted as these are the uses that can result in negative impacts for local residents and the local environment if not carefully managed.

4.22. To ensure that the evening economy management zone does not displace these uses to other parts of the town centre, outside of this zone and outside of the primary shopping area, policy PN3(d) proposes that:

- The proportion of A3, A4, A5 and nightclubs will be limited to 20 per cent of ground floor units
- No more than 2 in 5 consecutive ground floor units should be in these uses.

4.23. The approach to the indoor markets (as shown on the Policies Map) is proposed to be amended to ensure that any increase in A3 uses in each of the markets is subject to a management plan so that the necessary facilities are in place. PN3(a) of the Draft Revised Lambeth Local Plan proposes to use floorspace rather than units to ensure that a range of unit sizes are in A1 use. The policy also proposes that the thresholds for A1 and A3 units relate to ground floor units and connected upper floors that share the same access and that all independently accessed upper floorspace currently in D1 or B1 use will be protected. This is to ensure that current D1 or B1 uses on the upper floors of the markets are not lost due to an increase in A3 uses.

### Permitted development rights

4.24. There are some changes of use that can be carried out under permitted development rights. This means that development can take place without planning permission from the council. Current permitted development rights from the General Permitted Development Order 2015 for evening and night-time economy uses are set out in the table below. This table allows identifies whether prior approval by the local planning authority is required for the change of use to take place.

Change of Use From	Change of Use To	Subject to Prior Approval?
A3 or A5	A1 or A2	No
A4	A4 with A3 (drinking establishments with expanded food provision)	No
A4 with A3	A4	No
A5	A3	No
A1 or A2 or betting office or pay day loan shop or casino	A3	Yes

4.25. Changes of use from A1 (shops), A2 (financial and professional services), betting shop, or pay day loan shops to A3 is subject to prior approval. This means that the applicant must seek prior approval from the local planning authority. For this permitted development, consideration must be given through the prior approval process to the impacts of noise, odour, storage and handling of waste, hours of opening, transport and highways and the siting.

An assessment is also made on the impact of the proposed change of use to A3 on the adequate provision of services provided by the A1 or A2 use and, where the building is located in a key shopping area, the impact on the sustainability of that shopping area. The local authority should also consider the siting, design or external appearance of the facilities for ventilation, extraction and the storage of rubbish.

- 4.26. Some of the permitted development rights set out above may limit the effectiveness of the proposed evening economy management zone. For example, if a unit that is currently in use as an A4 use with A3 (drinking establishments with expanded food provision) can change to A4 use without the need to apply for planning permission, this means the council as local planning authority would not be able to control an increase in drinking establishments that do not have an expanded food provision in the evening economy management zone. It is these uses that can have the most impact on local residents. The council will continue to monitor the impact that these permitted development rights may have on the proposed evening economy management zone and consider what can be done to address this within the powers available to it.

## **Streatham**

- 4.27. 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.

### **Overview of policy context**

#### Lambeth Local Plan 2015

- 4.28. 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 use (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 in A, D or B1 use class.

### **Issues consultation**

- 4.29. Alongside questions on whether the town centre boundary should be amended, the Issues consultation asked stakeholders' views on Streatham's uses. 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.
- 4.30. 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.
- 4.31. 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.

### Evidence base

- 4.32. According to the latest Goad data, there are 428 units in the town centre as a whole in retail sales (convenience and comparison goods) and retail services (cafes, restaurants, take-aways, hairdressers, travel agents and banks).
- 4.33. Analysis of changes in the retail offer since 2012 highlights that retail vacancy rates in the town centre are low and have decreased since 2012. The town centre has an above average representation in convenience goods compared to the national average but a below average representation of comparison goods. 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% and now account for over 50 per cent of units. However there has been an overall decline in the number of units in A1, with a total loss of 19 units since 2012.
- 4.34. According to the latest Goad data (2017) there are some differences between the mix of uses in each of the primary shopping areas but neither of the two areas is meeting the current 60 per cent target for A1 uses. Streatham Hill primary shopping area also has a higher proportion of food and drink uses.

#### Streatham Hill primary shopping area

Use Class	Count	Proportion (%)
A1	61	50
A2	12	10
A3	16	13
A4	6	5
A5	9	7
All other uses	18	15
Total number of units	122	

#### Streatham Central primary shopping area

Use Class	Count	Proportion (%)
A1	72	51
A2	13	9
A3	10	7
A4	4	3
A5	6	4
All other uses	35	25
Total number of units	140	

## **Draft Revised Lambeth Local Plan**

- 4.35. Taking account of the evidence and the views expressed during the Issues consultation, Policy PN4 of the Draft Revised Lambeth Local Plan proposes 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) are to be in A1 use and within each area no more than 25 per cent food and drink use (A3/A4/A5) and no more than 2 in 5 consecutive food and drink uses.
- 4.36. This proposed policy reduces the policy target for A1 uses from 60 per cent to 50 per cent, reflecting the current position in each of the primary shopping areas and evidence that there has been a decrease in the proportion of A1 uses across the town centre. It is unlikely that the number of A1 uses in each of the primary shopping areas will increase to 60 per cent due to changes in the Streatham economy and the growth in food and drink uses.

## **Betting shops and payday loan shops**

- 4.37. The justification for the proposed approach to betting shops and payday loan shops in the Draft Revised Lambeth Local Plan is set out in 'Evidence on A2 uses, betting shops and payday loan shops in Lambeth' October 2017.

## Creative Enterprise Zones

- 5.1. Creative Enterprise Zones (CEZs) are an initiative by the Mayor of London to designate small areas of London where creative activity is supported. They are intended to offer incentives to retain and attract artists and new creative businesses with opportunities to network, become successful and benefit from sharing knowledge and expertise and to support regeneration and economic development.<sup>1</sup> The council classifies enterprises in this sector as creative and digital industries (CDI).
- 5.2. Lambeth's Creative and Digital Industries Strategy (2018) identifies CDI industries as the following: visual arts, fashion, architecture, photography, information technology, museums, galleries and libraries, health tech, crafts, software and applications, visual effects, broadcasting, publishing, games, design, creative tech, film and tv, advertising and media, music, animation and performing arts.
- 5.3. This section sets out the rationale for the proposed designation of a Brixton CEZ and West Norwood CEZ.

### Overview of policy context

#### Draft London Plan 2017 (as amended August 2018)

- 5.4. The Draft London Plan 2017 aims to support London's culture and creative industries. Policy HC5 encourages boroughs to work with the Mayor and relevant stakeholders to identify CEZs in Local Plans:
  - i) In areas that have emerging or existing clusters of creative industries; or
  - ii) In areas of identified demand and more deprived areas where there is evidence that the designation of a CEZ will enhance the local economy and provide facilities and workspace for the creative industries.
- 5.5. The Draft London Plan 2017 makes clear that where a CEZ has been identified, planning policies should develop, enhance, protect and manage new and existing creative workspace, support existing and new cultural venues with CEZs and to help deliver spaces that are suitable, attractive and affordable for the creative industries. Planning policies should also support a mix of uses that do not compromise the creative industries and cultural facilities and contribute to wider objectives of an area, such as the economic vitality and diversity of a town centre or the intensification of an industrial area.

---

<sup>1</sup> [Creative Enterprise Zone Prospectus](#)

## **Evidence base**

- 5.6. The Lambeth CDI Study 2017 identifies a lack of suitable premises for businesses in the CDI sector and recommends the provision of medium-sized offices, co-working spaces, maker spaces and managed office space suitable for small and medium enterprises. Lambeth's CDI Strategy 2018 recognises the significant contribution that CDI sector provides to Lambeth, including 22,000 jobs and the generation of £1.8bn GVA for the local economy. It identifies the importance of affordable workspace provision and protecting workspace suitable for the CDI sector through the planning system.
- 5.7. The Brixton Economic Action Plan (2017) identifies an under-supply of workspace compared to similar town centres in London and that this is affecting Brixton's ability to facilitate growth and realise its full potential.
- 5.8. As set out in section 4, the West Norwood Manual for Delivery 2017 identifies that the southern part of West Norwood district centre has been performing comparatively weakly to the rest of the centre. Vacancy rates are very high, with a nearly a third of all floorspace being vacant, and a gradual loss of shop units to residential uses has changed the character of the retail frontage. To improve the area, the Manual for Delivery proposes that this part of the town centre has the potential to become a Creative Enterprise Zone (CEZ) as a prominent hub for a range of creative activities and industry, providing jobs for local residents and helping to enhance the area's identity, complementing the adjacent Key Industrial Business Area.

## **Draft Revised Lambeth Local Plan October 2018**

### Brixton CEZ

- 5.9. Through the Mayor's CEZ Prospectus, boroughs were invited to bid for a CEZ Development Grant to test the feasibility of CEZs. Lambeth was one of eleven boroughs that were successful in their application and received a grant of £50,000 to develop a bid for a CEZ in Brixton. In July 2018, the council submitted its bid and the Mayor of London will announce in Autumn 2018 whether Brixton will be identified as a CEZ and awarded funding to support creative and digital industries.
- 5.10. To reflect the bid for a CEZ Brixton, the Draft Revised Lambeth Local Plan proposes to designate a Brixton CEZ, covering Brixton and parts of Loughborough Junction and Herne Hill. The extent of the proposed CEZ is shown in the Proposed Changes to the Policies Map document. The area is consistent with the area that was put forward as part of the bid for CEZ funding, which already contains a strong creative and cultural heritage, including architecture, design, music and visual arts.

5.11. Given the strong creative and cultural heritage of Brixton and the potential for growth in the CDI sector that is currently being limited by a lack of supply of workspace, it is proposed to continue with a Brixton CEZ in the Draft Revised Lambeth Local Plan even if the bid for a CEZ Development Grant is unsuccessful. Policy PN3(e) proposes that applications in the CEZ will be supported if they:

- i) maximise the amount of market and affordable workspace suitable for the CDI sector in accordance with Local Plan policy ED2;
- ii) provide a mix of workspace typologies (e.g. studio, co-working and office space) for different types and sizes of businesses with a focus on start-up, incubator and grow-on space for creative and digital industries that diversify and strengthen the sector; and
- iii) introduce space that promotes networking and information sharing between businesses and sectors within the creative and digital industries.

5.12. Draft Revised Local Plan policy ED2 proposes a specific approach to securing affordable workspace in the Brixton CEZ. The Brixton CEZ consists of two parts: Brixton major town centre and a wider area outside of the town centre. The Brixton Creative Enterprise Zone: Affordable Workspace Analysis 2018 identified that development viability differs in these two parts of the CEZ and as a result, the policy proposes different discounts on rents depending on the quantum of office floorspace being proposed and its location.

#### West Norwood CEZ

5.13. As set out in section 4, it is proposed to partially de-designate West Norwood district centre. The Draft Revised Lambeth Local Plan proposes to designate this area as a CEZ to support CDI industries and to complement the adjacent Key Industrial Business Areas. The extent of the proposed CEZ in West Norwood is shown in the Proposed Changes to the Policies Map document.. The focus on the CEZ will be to provide flexibility for different uses to emerge with mixed-use developments that can provide residential on the upper floors and deliver ground floor workspace for makers and creative and digital enterprises, so long as the residential uses do not compromise the function of the CEZ or the adjacent Key Industrial Business Area. As the focus of the CEZ will be space for makers, there is opportunity for proposed developments to include small amounts of ancillary sales or displace space.

5.14. Draft Local Plan policy PN7(d) sets out how the council will support the function of the CEZ by supporting:

- i) mixed-use or enabling development, which may include residential on upper floors, as long as it would not negatively affect the function of the CEZ or adjacent KIBA and would deliver ground floor workspace for makers and creative and digital enterprises;
- ii) proposals that maximise the delivery of workspace appropriate for creative and digital enterprises; and
- iii) proposals which complement the creative and digital industries, such as include ancillary sales/display space or meeting spaces

## Public houses

- 6.1. Over recent years many pubs in Lambeth have been lost to alternative uses, or have closed and are currently vacant. This section summarises the minor changes to the Local Plan policy on public houses in response to changes to permitted development rights and the Draft New London Plan 2017 (as amended August 2018).

### Overview of policy context

#### National Planning Policy Framework 2018

- 6.2. The council is required by paragraph 92 of the National Planning Policy Framework (NPPF) to provide the social, recreational and cultural facilities and services the community needs by planning positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

#### Draft London Plan

- 6.3. The Draft New London Plan 2017 (as amended August 2018) introduces a policy (HC7) to protect public houses. It seeks to protect 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.

#### Local Plan 2015

- 6.4. Policy ED8 of the Local Plan 2015 protects public houses. Where there is an application for a change of use, redevelopment or demolition of public houses, the council will consider:
- whether the public house is no longer economically viable (including evidence of a marketing exercise for at least 12 months);
  - whether the proposal will result in the loss of a service or facility of particular value to the local community; and
  - whether the proposed alternative use will detrimentally harm the vitality of the area and the character of the street scene.

- 6.5. The policy 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. The loss of cellarage and other features which might render the public house unviable will also be resisted.

### **Permitted development rights**

- 6.6. 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.

### **Issues consultation**

- 6.7. The Local Plan Review Issues consultation took place between 9 October and 4 December 2018. In light of changes of changes to permitted development rights, the Issues consultation asked stakeholders their views on whether the existing Local Plan policy 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.
- 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 has been amended to align with the Draft London Plan policy HC7. When considering whether a public house is no longer economically viable a viability report is still required but the marketing exercise must now run for a period of at least 24 months, rather than 12 months, in accordance with the Draft London Plan 2017. An assessment will be made on whether there would be a loss of a service or facility of particular heritage, economic, social or cultural value to the local community, based on the tests set out in the London Plan. The listing of a pub as an Asset of Community Value will also be a material planning consideration.
- 6.10. The Draft Revised Lambeth Local Plan policy strengthens 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. The policy sets 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 2017. This will include consideration of issues such as licensing 'cumulative impact zones' and the agent of change principle.

## Appendix 1 – Brixton town centre uses

