

Policy 1 The Vision for Lambeth

Summary of Representations & Responses (Policy):

Objection A:

The emphasis in this the opening policy of the entire UDP should be on more housing of all sorts, not specifically more affordable housing (Giles Atkinson of House Builders Federation, Terry Fuller of Bryant Developments)

Response A:

Accepted – change made, still giving emphasis to affordable housing giving Lambeth's pressing housing needs.

Objection B:

Final sentence should be amended to include requirement for applications to show a 'positive impact' on communities, environmentally, and in line with any regeneration for the given area (Sadie Campbell, Brixton Area Forum)

Response B:

Not accepted – planning law operates on the basis of material harm.

Objection C:

Affordable housing should be counted as a community benefit in and of itself (Rose Sandell of LAMHAG)

Response C:

It is, however there is no basis in national policy for immunising affordable housing proposals from planning obligations. They are not sought as 'community benefits' but to compensate for or mitigate against material harm (detrimental planning impacts) caused by the proposal. This is in accordance with national planning policy. This can occur equally in the social housing sector.

Objection D:

Word 'great' should be replaced by 'attractive' or the like, and 'liveable communities' should be reworded (J Clyne)

Response D:

Not accepted – 'great ' is from Lambeth's Corporate Statement and is considered to be plain English. 'Liveable' is appropriate in the context of that sentence.

Objection E:

The word 'health' should be inserted in as one of Lambeth's Strategic Objectives, as well as 'promoting a healthy borough' (Gordon McDougall of the Kennington Association)

Response E:

Accepted – change made.

Objection F:

The South Bank should not be forgotten for regeneration, alongside 'Lambeth's most deprived communities' (Anne Burke and Marina Thane of County Hall Owners and Resident's Association)

Response F:

The vision for Lambeth applies equally to every part of the borough and there is nothing in the policy to suggest otherwise.

Objection G:

Second spatial priority should include 'protecting community facilities (Brixton Area Forum)

Response G:

Accepted in part, however the suggested wording does not cover the quality and suitability of community facilities.

Objection H:

First spatial priority should include specific reference to improved access on foot and by bicycle (Brixton Area Forum).

Response H:

Accepted – change made.

Objection I:

Third spatial priority should be added –‘To protect the character of the Borough and its heritage of Parks and Open Spaces’ (Andrew Simpson).

Response I:

Accepted – a change to this effect is proposed.

Objection J:

Vision lacks in reference to ensuring that the environmental aspect of the borough is protected, and where appropriate enhanced for the benefit of residents and visitors (Steven Cowley of Lambeth Friends of the Earth).

Response J:

Not accepted – as the policy and the plan commences with a clear statement of achieving sustainable development as its top priority, no change of wording is suggested.

Objection K:

First sentence should reflect the greater importance of local residents and workers by exchanging 'visit' and 'work' (Jim Nicholson of Vauxhall Society).

Response K:

Accepted – change made.

Objection L:

Walking and being outdoors needs to be more fully promoted in the vision (Roger Evans of Walk First in Lambeth).

Response L:

Not accepted as a reference to walking has been added and this would be duplication, and because 'residential amenity' though partially jargon, is a very widely used, tested and understood term in planning that has no adequate synonym.

Objection M:

A plain English term for 'residential amenity' needs to be found, add to beginning “and be out and about in. (Feet First in Lambeth)

Response M:

Not accepted – the term 'residential amenity' is widely used and understood in planning.

Policy 2 London South Central

Summary of Representations & Responses (Policy):

Objection A:

Should designate the part of the Mayor's proposed 'Strategic Cultural Area' on the South Bank within Lambeth (Mayor of London).

Response A:

Accepted – is already designated as the Waterloo Visitor Management Area and the policy itself is proposed to be modified to reflect its strategic importance.

Objection B:

This policy should be completely removed, as it is an unachievable and conflicting wish list. There is no room to put so much development dedicated to so many different conflicting uses into Waterloo, and there seems little merit in doing so. Major redevelopment is more likely to export the deprivation to Vassal and Angell whilst gentrifying Waterloo, thereby exacerbating problems of social exclusion. (Michael Ball of Waterloo Community Development Group)

Response B:

Not accepted – London-South Central is a key priority of both the London Borough's of Lambeth and Southwark, of the London Development Agency and the Greater London Authority – the Mayor of London – in the forthcoming plan for London. It is the focus of more than £100 million of current regeneration initiatives and will be the focus of a joint capital pot bid (replacement for SRB) between Lambeth and Southwark. Lambeth has to accept that it contains a significant part of Central London with regeneration potential. It is accepted however that South of the River is distinct from the West End and that development needs to be of a different scale and nature as a result. The objector has made a number of good points, which are to be incorporated into the revised supporting text.

Objection C:

Developments to be only accessible by users, coming by sustainable forms of transport, that is pedestrians, cyclists and public transport user (Lambeth Cyclists).

Response C:

Not accepted – this would involve banning cars in all circumstances which is considered overly strict and unreasonable. Lambeth's and the Mayor of London's policy is to restrict and reduce car use, not to prohibit it.

Objection D:

Policy will remove individual character of North Lambeth's riverside communities (N Lambeth, Vauxhall, Kennington, Waterloo), associated with its low rise, leafy and residential character (Celia Stothard).

Response D:

Not accepted – a key element of the Central London policy approach (see policy 3) is to protect these communities and those supporting uses and activities that contribute to the character of the area. Revised supporting text reinforces these distinctive qualities.

Objection E

Policy should mention the work of the South Bank Employers Group, its Urban Design Strategy, and the Waterloo Project Board which has been established to provide an additional catalyst to regeneration in the area in conjunction with the London Development Agency (Howard Simmons of the South Bank Employers Group).

Response E

Not accepted – partnership strategies relating to specific parts of the borough, are best mentioned in part II of the plan, to avoid duplication. Amendments proposed to Part II reflecting these documents.

Objection F:

Policy should also refer to pollution, and word 'extension' should be replaced by 'increase' (Gordon McDougall of Kennington Association)

Response F:

Accepted – changes made.

Objection G:

The word 'resident' is not mentioned once in the policy, which needs many of its key phrases defined and tightened up (Anne Burke and Marina Thane of the County Hall Owners and Residents Association).

Response G:

Accepted in part – the policy does mention the local community, which of course includes its residents. Clarification proposed however. Many questions are asked, few suggestions for rewording are proposed. These questions may properly be answered by seeing the policy in context with other policies in the plan on the South Bank, Waterloo, and Offices etc. There are no proposals to increase traffic on the roads or to build new railway viaducts; such increased severance will not be an issue. The study of 1945 is clearly quoted as an example of the planning mistakes of the past.

Objection H:

Must be controls to ensure that the impact on the environment is minimised as far as possible, including a preference is for no loss of open space (Stephen Crowley of Lambeth Friends of the Earth)

Response H:

Noted – other policies in the plan protect open space and prevent harm to the environment.

Objection I:

Development should not continue the existing over-development of the strip along the river but should increase local access to and views of the river (Jim Nicholson of the Vauxhall Society)

Response I:

Not accepted as impact on the river, views of the river etc. are fully covered by policy 39 and it would be duplication to include the text of that policy again here.

Summary of Representations & Responses (Paragraph 4.4.1):

Objection A

Paragraph 4.4.1 should mention forthcoming London South Central Transport Strategy (Mayor of London)

Response A

Accepted – change proposed

Policy 3 The Central London Policy Area

Summary of Representations & Responses:

Objection A:

This policy leaves too many options for what Waterloo must provide. To avoid Waterloo becoming an anonymous part of globalized inner cities there really has to be confidence in, and concentration on, what Waterloo specifically has to offer. (Jenny Stiles of Association of Waterloo Groups)

Response A:

Not accepted – a key aspect of the policies surrounding Central London activities is to protect those uses such as small shops, pubs etc. that could otherwise get squeezed out. This is explicit in the UDP and RPG3. Hence, the policy is a key component in preventing Waterloo becoming anonymous.

Objection B:

Phrases 'protecting the character' and 'local resident character' in Para (B) should be more closely defined. (Michael Ball of WCDG)

Response B:

Not accepted – this is a matter of common sense and incapable of an expanded but still clear definition. In all cases simpler, but still sharp, wording is to be preferred.

Objection C:

Policy does not recognise the inevitable loss of surplus primary health care facilities (and replacement elsewhere) involved in the NHS modernisation programme. (NHS Executive, London Region)

Response C:

Not accepted – at the Westminster UDP Inquiry the Inspector considered that hospitals were very important central London activities that should fall within the ambit of the policy. This is especially the case in Lambeth where they serve the government area. Also table 1 only covers 'Medical Establishments of regional, national and international importance' which would not cover most primary care facilities which would solely fall to be considered under Policy 26, which allows for replacement elsewhere.

Objection D:

Policy does not offer adequate protection from noise and damage to amenity arising from Central London Activities. (Simon Allison of Whitehouse Residents Association)

Response D:

Not accepted – the policy refers explicitly to protecting local residential character and amenity. Policy 29 specifically deals with the issue of late night activities and it would be duplication to deal with these matters again here.

Objection E:

Walking and cycling should be specifically referred to in Policy 3(B), Table 1 key Central London Activities, Table 2. (Lambeth Cyclists)

Response E:

Not accepted – as the term transport facility is designed explicitly to refer to when these form land-uses in their own right, which walking and cycling rarely do. Rather, they are best seen as essential and sustainable means of access to Central London activities.

Objection F:

The area south of Lambeth Bridge should not be included in the Central London Policy Area as Vauxhall Cross should be kept free of development to allow it to fulfil its transport interchange role. (I.D. Adams of Manor of Kennington residents Association)

Response F:

Not accepted – Vauxhall Cross is explicitly included in the map included in RPG3 as being the boundary of Central London. And in the map, included as being the current

definition of Central London (for purposes of referring matters to the Mayor) within the Town and Country Planning (Mayor of London) Order 2000. The Mayor's document 'The London Plan' identifies the Vauxhall/Battersea area as being a potential growth area within Central London. Plan policies specifically prevent traffic generating activities in this area and seek major contributions, which can only be secured from major development, to dramatically improving public transport and the public realm. It is one of the very few areas within the innermost parts of London with potential free public transport capacity and the potential for major development. This is an asset for London and Lambeth, which must not be wasted. Lambeth is working in partnership with the London Development Agency and the Cross-River Partnership to ensure that major development is co-ordinated and benefits the area.

Objection G:

The policy must be more robust about protecting the existing communities. (Anne Burke and Marina Thaine of County Hall Owners and Residents Association)

Response G:

Not accepted – the amenities of local residents are fully protected by the provisions of Policy 7 of the Plan. The definition of what is and what is a not central London activity has been refined, tested over 40 years, and is included in government policy RPG3.

Objection H:

Policy should allow for loss of Central London Activities if they are going to be replaced and improved. (Alsop Verill)

Response H:

Not accepted – as in such a case there would be no loss of Central London activities and the policy would be complied with.

Objection I:

Vauxhall Bridge should be the southern boundary to the Central London Policy Area because the indicated Central London Policy Area encompasses the Sainsbury's Nine Elms store and Keybridge House on Wandsworth Road which self-evidently do not support London's Key Central Activities. (J Sainsbury's PLC)

Response I:

Not accepted – as the current boundary in RPG3 is in need of review in this area. RPG3 requires UDP's to define detailed boundaries and LPAC reviewed these however they it did not consider the detailed boundary in this area. This is now being considered as part of the London Plan and Lambeth's UDP review. A boundary that divides the southern half of Vauxhall Cross from the northern half clearly does not make sense – what is different about the two areas in terms of there capacity to support central London activities? Major office development has been proposed just south of this line – does this make it less suitable despite being so close to the interchange? The boundary does not reflect current regeneration city in the area, in particular the identification of the Vauxhall/Battersea areas as a major growth area in the Mayor of London 'London Plan', so that development in Vauxhall Cross is a spur to regeneration to the South East in Battersea. The Borough, the GLA and the LDA are working to prepare a development framework for this area.

Objection J:

More is needed in Part (B) to protect Jubilee Gardens open space, minimise obstruction of Riverside Walk, remove unlicensed commercial activities, and minimise impacts of coach parking on Albert Embankment. (Jim Nicholson of Vauxhall Society)

Response J:

These matters of detail are all covered in specific policies in part II of the plan.

Summary of Representations & Responses (Paragraph 4.5.5):

4.5.5...[add to end] In assessing the character of the area regard should be had to those features highlighted in the supporting text to Policy 2.

Policy 4 Town Centres and Community Regeneration

Summary of Representations and Responses (Policy):

Objection A:

Should refer to 'Major and District Town Centres to be consistent with terminology across London'. (Mayor of London).

Response A:

Accepted – change proposed to be made

Objection B:

Should add additional clause that servicing of retail development, particularly in Brixton and Streatham, should not harm the operation of bus services (Mayor of London).

Response B:

Not Accepted – Policy 11 covers the priority to be given to bus operation and this point is best dealt with through an amendment to that policy giving priority to bus operation over distribution.

Objection C:

Part E is unclear and the blanket requirement for demonstration of viability is unreasonable unless it is explained – firstly, how that demonstration is to be carried out, secondly, to what level, and thirdly how it will be assessed. (Jeremy Hammerton and John Adams of the Clapham Society, Margaret Ross-Bell of Clapham South Neighbourhood Association, John How of Clapham and Stockwell Town Centre Board).

Response C:

Accepted in part – change proposed to be made.

Objection D:

Unclear whether Part D means new or existing centres (Margaret Ross-Bell of Clapham South Neighbourhood Association).

Response D:

Accepted – change proposed to clarify that it means both if local facilities are provided where lacking.

Objection E:

All town centres, district centres, local centres and edge of centre areas and local parades of shops should be listed in the Policy (Margaret Ross-Bell of Clapham South Neighbourhood Association).

Response E:

Not accepted – if all are shown on the Proposals Map this would just add length to the plan. The written statement of the plan is not a gazetteer, such detailed schedules can and will be supplied separately.

Objection F:

Only in the most exceptional circumstances (where a decline in viability over 3 years can be demonstrated) and where the loss of the site for A or D class use will not harm the viability of neighbouring units or the local/ district/ town centre should loss of edge-of-centre units be acceptable. Loss of units from A or D class use in the core area should not be permitted at all (Michael Ball of WCDG, Michael Ball of Vauxhall Neighbourhood Housing Forum).

Response F:

Part accepted – 3 years is an excessive period of vacancy that would harm the ongoing vitality of town centres. It is not in the interest of the policy or national guidance to encourage long-term vacancy, whether in the core of centre or edge-of-centre locations. However the policy, and other policies in the plan, promote and encourage A and D class uses in these locations and this policy has been strengthened to support this. It is important that the policy flexibly sets out the best mix of uses to establish a vital and viable town centre whilst protecting amenity. In line with PPG6 and draft PPS6 there should be the consideration of other uses,

including B and C class, as part of mixed-use schemes – in any case an active frontage must be retained.

Objection G:

The Council should be more supportive of new housing development as a suitable use in town centres, and refer to it as such in this Policy (Giles Atkinson of House Builders Federation, Fairclough Homes Ltd, Fair View Homes Ltd, St Georges, Alsop Verill, Terry Fuller of Bryant Developments).

Response G:

Accepted – change made, although housing should be complementary to active frontage uses.

Objection H:

The edge of the centre in Waterloo is too widely drawn. The Cut and Waterloo Road should be in the core and the edge of centre should be confined to Waterloo Station and York Road – not including Belvedere Road – only. Development of the station is the key. (CC Smith)

Response H:

Part accepted – the edge of centre has been redrafted in light of consultant reports and national guidance through draft PPS6. Waterloo station, when and if redeveloped, will be done so as a train station/interchange with ancillary commuter shopping. The revised Lower Marsh district town centre boundary has been modified to reflect this and place an emphasis on the retail offer of the core of centre with a more focussed and refined edge-of-centre boundary, thereby removing Waterloo Station and Belvedere Road. The Cut and Waterloo Road have different character than Lower Marsh, less busy and without a market, and the mix of uses in these streets is typical of edge of centre locations.

Objection I:

Clapham Common Southside shopping parade frontage should be included within the Clapham High St District Centre (John How of Clapham and Stockwell Town Centre Board).

Response I:

It is shown on the proposals map already, but in a very weak colour. This mapping problem will be rectified at revised deposit stage.

Objection J:

The local shopping centre at the corner of Radbourne and Emmanuel Roads has been omitted on the main proposals map (John How of Clapham and Stockwell Town Centre Board).

Response J:

Having only two shops it is considered too small for inclusion on the proposals map. In general, only parades of minimum three defined shops (general grocery store, sub-post office and a newsagent), including one general convenience store, and several other small shops, are included.

Objection K:

The policy does not allow for the provision of A or D Class uses within mixed-use schemes in other appropriate locations (Level Properties, Mark Brown, Eaton Square Garages Limited).

Response K:

Not accepted – this would be clearly contrary to government policy in PPG6 and PPG13, which focuses new development attracting significant numbers of people to town centres. Policy 4 deals with town centres, it does not deal with out-of-town centre proposals - this is dealt with in Policy 5. It would not be appropriate for a policy dealing with the regeneration of town centres to promote out-of-town development.

Objection L:

Waterloo should not be the major town centre for the north of the Borough and Kennington, Oval and Vauxhall should be district centres (I D Adams of Manor of Kennington Residents Association).

Response L:

Not accepted, Oval and Kennington do not meet the government's definition in PPG6 of district centres, as they do not have supermarkets.

Objection M:

Buildings should be specifically designated for community use in town centres (Marcia Simpson of MKS Consultancy)

Response M:

The Lambeth plan is unusual in specifically allowing and promoting community uses in primary frontages in town centres. It is proposed to amend (C) to reflect the wider range of non-commercial functions of town centres.

Objection N:

D Class community facilities aimed directly at BME communities should be actively encouraged and incorporated in the UDP to address social exclusion (Marcia Simpson of MKS Consultancy).

Response N:

Not accepted – they have been expressly promoted and supported in Brixton and the UDP is most explicit about this, giving this matter specific priority. No change is suggested.

Objection O:

Lambeth Walk should at least be designated as a local centre (Michael Ball of the Vauxhall Neighbourhood Housing Forum).

Response O:

Accepted – now shown on proposals map, together with Black Prince Road.

Objection P:

Core area should include The Cut, part of Waterloo Road, Westminster Bridge Road and Kennington Road (Circle Initiative of Lower Marsh and the Cut Business Improvement Partnership).

Response P:

Not accepted – The Cut, Kennington Road and Waterloo Road have different characters than Lower Marsh, less busy and without a market, the mix of uses in these streets is typical of edge of centre locations and they are separated by major arterial routes creating strong physical barriers to a coherent core of centre.

Objection Q:

Kennington should be included as a district centre (Gordon McDougall of Kennington Association).

Response Q:

Not accepted – under government policy in PPG6 it would only qualify if it were much bigger (min 9,300m²) and had a supermarket.

Objection R:

The new UDP does not identify primary and secondary shopping frontages therefore the role of centres lacks clarity. Concern above mansion flats in Streatham over changes of use to A3. We also feel that there is a need to safeguard remaining units with above average floor-space in the town centres, in particular current A1 uses and current A2 uses with shop frontages (as distinct from Victorian bank buildings etc). These premises provide the size of units attractive to the national retail chains, and could support the development of comparison shopping in the major centres. (Robert Doyle of the Streatham Society)

Response R:

Part accepted – amendments proposed to deal with these points. The new Policies 29 and 67 deal with the impact of food and drink uses in Streatham. Larger units in district centres have been struggling to attract occupiers and so are not proposed for similar protection. However primary and secondary frontage are not included as the plan deals with core of centre and edge-of-centre areas. Primary and secondary frontage is more of a commercial tool than a planning tool, and may and does change over time. However the core of centre allows the designation of a coherent town

centre area within which is contained primary and secondary frontage. This is also in line with national guidance.

Objection S:

The policy needs to make the interdependency of the Borough's town centres clearer. Development should not be promoted in some town centres at the expense of others. (Robert Doyle of the Streatham Society)

Response S:

Accepted in part – it is proposed to add a section to paragraph A making this interdependency clearer, as is set out in PPS6 and reflected in Policy 5. Retail investments will sometimes require choices between town centres however and government policy is not to stifle competition between town centres.

Objection T:

It is very arguable whether we have any Town Centres in the strict sense of the term and from a commercial standpoint. Brixton is probably the closest we have to a conventional shopping-based Town Centre, but for most of the Borough, we have linear High Streets of narrow depth incorporating small units devised during the Victorian period or early parts of the last century. Policy does not take into account the impact of enhancement of town centre areas on local residential amenity (Councillor Brian Palmer).

Response T:

Accepted in part – It is proposed to amend the policy and supporting text to promote the viability of town centres with a focus on an A1 base. Concerns over A3 uses is dealt with in Policy 29 on that issue, the concentration and overall level thereof limited to allow for a proper balance of town centre uses and to protect amenity.

Objection U:

Policy does not provide for the provision of new public toilets (Carole Gillian).

Response U:

This is dealt with in proposed amendments to Policy 48.

Objection V:

Waterloo does not need a major shopping centre, but if Lower Marsh is to be where it is, policy should allow only very limited, ancillary shopping directly related to the tourist/visitor attractions on the riverside of Waterloo (Anne Burke and Marina Thane of the County Hall Owners and Residents Association).

Response V:

Part accepted - evidence from consultant reports suggests that it is more prudent to plan for the betterment of the existing district town centre. However Waterloo has the long-term potential to increase in the retail hierarchy but this will depend on the comprehensive redevelopment of the station and a revised approach to the district town centre boundaries should that redevelopment materialise.

Objection W:

The inclusion of a diverse range of terms for different centres is confusing and inconsistent with Government guidance (B&Q Plc).

Response W:

Accepted – changes have been made to the Policy, which complies with terminology in the Mayor's London Plan.

Objection X:

Policy encourages the development of homogenous, large-scale multiple retailing, as opposed to the economically and culturally diverse pattern of retail currently in Brixton based on mixed, local and traditional shops (Brixton Area Forum Board).

Response X:

Part accepted – the policy does not “encourage” a type of retailing, nonetheless change proposed to clarify this - however the wording must reflect that alongside small unit traditional retailing, Lambeth has a shortage of multiples and chains. Policy 52 Brixton Town Centre – Character and Function categorically protects the

local/traditional/multi-ethnic nature of Brixton town centre against development that would impact detrimentally upon it.

Objection Y:

The policy must ensure that large scale development in one centre doesn't have a detrimental impact on other centres by clearly defining boundaries between the various centres through more use of features like commons, parks and open spaces (Stephen Cowley of Lambeth Friends of the Earth).

Response Y:

This matter is dealt with in Policy 5, compliant with draft PPS6, in that Government policy requires development to be compatible with the scale and function of the town centre and must meet retail needs. Beyond this however it can not prohibits one centre competing with another and, sometimes, difficult choices have to be made over which centres to back for increased retail investment – PPS6 endorses preparing strategies for both the growth and decline of centres.

Objection Z:

Policy may lead to an excess of A3 uses causing residential amenity impacts, particularly in Streatham Vale Local Centre (around Streatham Common Station) (Jonathan Leake of Lower Streatham Neighbourhood Watch and Residents Association).

Response Z:

Not accepted – as impact of A3 food and drink uses is covered by Policy 29. There are many local centres in Lambeth and it is not possible to cross-refer to all of them.

Objection AA:

Policy should specifically seek increased local accessibility to shops and services, should apply as equally to local centres as to district and town centres, and should seek to improve the range and quality of non-supermarket retail south of Waterloo (Jim Nicholson of Vauxhall Society).

Response AA:

Accepted in part – it is only necessary to mention accessibility once in the policy however, and the wording on north Lambeth needs to be less specific, as this will be judged against Policy 5, and a small supermarket may be appropriate as part of major development in Vauxhall Cross.

Summary of Representations and Responses (Paragraph 4.6.1):

Objection A:

Should refer to centres rather than Town Centres as only two centres are identified in Table 3 and the reference appears to be directed at more than two centres. (Zbig Blonski, Borough Planners Service – Wandsworth Council)

Response A:

Accepted in part – in the hierarchy in London district centres are town centres (i.e. major town centres and district town centres) and a proposed amendment makes this clear.

Policy 5 The Sequential Approach to Uses which Attract a lot of People

Summary of Representations & Responses (Policy):

Objection A:

Policy refers to boundaries and edges of centres, which are not clear on the map, not defined in the text, and which need clarification. (Jeremy Hammerton and John Adams of the Clapham Society)

Response A:

Accepted – the final version of the proposals map will be much clearer.

Objection B:

'Net unacceptable impact' is not defined and will lead to confusion (Michael Ball of WCDG).

Response B:

Not accepted – this goes beyond PPG6 and draft PPS6 and would cut across accepted precedent and practice.

Objection C:

The reference to 1,000 sq.m falls grossly below the 2,500-sq.m threshold advised by PPG6. At this scale, a retail, economic or transportation impact assessment would serve no real purpose and/or is an unreasonable information requirement. (Groveville Ltd, Clapham Park Developments Ltd, Weald Properties Ltd, Chelsfield plc, CLS Holdings plc, Delancy Estates Ltd and Clerical Medical Investment Management Ltd, Shell International Petroleum Company and Lend Lease Europe, B&Q Plc, Ridale Developments Limited, J Sainsbury's Plc)

Response C:

Part accepted – the government has acknowledged that the threshold of 2,500 s.q. m. is now too large. The market has responded and the vast majority of new store openings are below this size and the impact should legitimately be considered. Draft PPS6 has removed the reference to 2500m² or any major development threshold and has set out that "the scale of new facilities should be directly related to the role and function of the centre and the catchment that they seek to serve" (para. 2.33) thereby allowing for a more flexible approach to centre growth and enabling proposals to be assessed on their specific merits in relation to a centre. Nonetheless it is prudent to retain the threshold for 2500m² as this allows for an automatic requirement for retail impact assessment for what will remain major applications, whilst allowing the flexibility to assess all other applications on the basis of their proposed scale within the relevant centre. Draft PPS6 is also only a consultation document at the moment, although consultation on this document did end on 15th March 2004.

Objection D:

The policy is not in accordance with the sequential and need tests in Government guidance in PPG6 and "Caborn statements". In particular the policy omits reference to need and does not specifically refer to leisure and entertainment (Zbig Blonski - Borough Planners Service, Wandsworth Council).

Response D:

Accepted in part – clause (e) of the policy covers the Caborn statement as it applies to sites not identified in the development plan. It is understood that the objection relates to the scale of need identified in the plan and amendments are proposed to cover this here, in part B of the plan and in Para 4.6.4.

Objection E:

The differentiation between district centres and major centres makes it difficult to attract investment into the former, and assumes that the areas that have historically had the largest investment are the best places to have more in the future. (Roderick D. Brown, J H Ward, Allsop Verrill)

Response E:

Accepted in part – an amendment is proposed clarifying that development of an appropriate scale and function is appropriate in district centres, as set out in draft PPS6. However, larger development needs to be located in sequentially preferable locations.

Objection F:

Policy fails to mention relevant Government Guidance. (John How of Clapham and Stockwell Town Centre Board)

Response F:

Government guidance is about to change and will continue to be updated – there is the current PPG6 and draft PPS6 (the replacement for PPG6) which are both referred to or inferred in the draft Policy. In any case it is not the role of development plan policies to religiously repeat national government policy, but rather to interpret and apply it in the local context.

Objection G:

Policy should mention importance of neighbouring boroughs working jointly whenever possible on development briefs for key cross-boundary sites (or near boundary) sites (John How of Clapham and Stockwell Town Centre Board).

Response G:

This is more of a matter of plan implementation than of the policy wording of the plan.

Objection H:

The reference to centres outside of the Borough could allow these areas to have an adverse impact on the ability of the Borough to meet its own shopping needs. (Level Properties Ltd, Eaton Square Garages Ltd)

Response H:

Not accepted – not having an adverse impact on town centres outside the borough need not adversely impact on Lambeth's reasonable aspirations, Lambeth would ask the same of other boroughs.

Objection I:

The position in relation to MDO sites is unclear and clarification is required on whether it intended that they be specific allocations under the terms of this Policy. (Level Properties Ltd, Mark Brown)

Response I:

Accepted – clarification on priority of MDOs is proposed through an amendment to part (a) of the Policy.

Objection J:

The whole of that part of the Borough that is within the defined Central London Policy Area should be included within the first category of the order of preference, and thus be consistent with the aim of the "London South-Central" policy (Chelsfield plc, CLS Holdings plc).

Response J:

Not accepted – the Central London Policy areas includes areas which are highly accessible and which are suitable for large retail and leisure development, such as parts of Waterloo, and those that are not such as Vauxhall Cross, Albert Embankment etc.

Objection K:

It is unclear to which land uses the policy applies. The policy should identify the specific land uses to which the policy will be applied. This policy should use the definitions set out in PPG6 "Town Centres and Retail Development" to set the order of preference for the location of new development. (Delancy Estates Ltd and Clerical Medical Investment Management Ltd, Shell International Petroleum Company and Lend Lease Europe)

Response K:

Accepted in part – PPG6 refers to 'Key Town Centre uses which attract many people', but it does not define these; it just gives examples. It is proposed to amend the plan giving examples. In London, it is necessary to apply the sequential approach in a manner, which reflects its unique categories in its town centre hierarchy in RPG3.

RPG3 states that the sequential approach in London “needs to be applied with care as London has many centres performing different functions”. Because of this, all of the Boroughs produced supplementary strategic advice on Town Centres in 1996, which the Lambeth Deposit UDP policies and several other London borough UDP policies, endorsed at public inquiries, have been based.

Objection L:

The main part of the policy should be reworded to acknowledge that MDOs are sequentially preferable. (Delancy Estates Ltd and Clerical Medical Investment Management Ltd)

Response L:

Accepted - clarification is proposed regarding Major Development Opportunities (see I above).

Objection M:

In criterion (b) how is ‘better public transport accessibility’ defined and what is it to be assessed against? (Shell International Petroleum Company, Lease Europe, Allsop Verill)

Response M:

Accepted in part – the definitions are those in map 1 on page 41 of the plan (Public Transport Accessibility), which apply across the board. Good or better, means what it says, better than good, i.e. very good or exceptional on this map.

Objection N:

Policy does not take into account the impact of enhancement of town centre areas on local residential amenity (Councillor Brian Palmer of Lambeth Liberal Democrat Group).

Response N:

These matters are dealt with in amendments proposed to policy 4, that specifically covers amenity issues in town centres.

Objection O:

Much more consideration needs to be given to the highly sensitive Waterloo and its Conservation Areas before simply labelling it a major development area (Anne Burke and Marina Thaine of County Hall Owners and Residents Association).

Response O:

Not accepted – as part B of the plan contains a carefully measured set of policies to ensure the right balance of development in Waterloo.

Objection P:

As currently drafted the policy lacks clarity and is unnecessarily lengthy. (B&Q Plc)

Response P:

Not accepted – the policy has been framed with the advice of two counsels, the sequential approach is an inevitably difficult one.

Objection Q:

The 'order of preference for the location of development' is unnecessarily repetitive and as such over complicates and lengthens the policy. It is strongly recommended that the policy should simply refer to the requirement to apply the sequential approach having regard to the retail hierarchy within the Borough. Object to 'within the lifetime of the plan'. (B&Q Plc)

Response Q:

Not accepted – see responses above, the lifetime of the plan issue has been established by appeal precedents.

Objection R:

Whilst guidance states that developers and retailers should be more flexible about the format, design and scale of development, this must be assessed having regard to the "need" identified. Developers should not be expected to demonstrate why they could not 'develop elements of larger schemes in town centre locations, tailoring, reducing or splitting projects so that they can be accommodated in preferred areas or on existing sites'; as is currently suggested within the supporting text. Should this compromise the ability of the proposal to meet the identified need (B&Q Plc).

Response R:

Not accepted – This interpretation conflicts with the ‘class of goods’ approach to the assessment of retail need as set out in the government parliamentary statement. (DETR response to House of Commons Environment Select Committee Report 'The Environmental effects of Supermarket Competition')

Objection S:

Objection raised to the content of paragraph 4.6.9, which is unnecessary and draws conclusions regarding the impact of out-of-centre development and traffic congestion based purely on unjustified assumptions (B&Q Plc).

Response S:

Not accepted – this is a widely accepted view of the impact of some edge of centre stores reflected in the special requirement on edge of centre stores in RPG3 para.5.2.

Objection T:

Policy does not give sufficient weight to the importance of the character of Lambeth's town centres, nor sufficient protection to the viability of existing centres in relation to new developments (Brixton Area Forum Board).

Response T:

Accepted in part – the essence of the concerns can be reflected, however government policy in PPG6 does not prohibit the impact of a development within the core of a town centre on another part of it. Town centres do change. However, it does allow for consideration of impact on regeneration proposals, the amendments are considered to be as far as it is permissible to go without breaching PPG6.

Objection U:

Banks, pharmacies, post offices and “other facilities, which might damage existing local specialist businesses,” should be included in Policy 5 as activities that are inappropriate in town centre locations (Brixton Area Forum Board).

Response U:

Accepted – change proposed

Objection V:

The title to Policy 5 is misleading and does not appear to accord with Government policy, which addresses the subject of assessing major shopping proposals. The major shopping proposals as referred to in the Government guidance are those retail developments of regional significance. These major new retail developments should be separated from suitable sites within existing town centres such as some of those sites which are identified as major development opportunities (Ridale Developments Limited).

Response V:

Accepted in part – change proposed.

Objection W:

The phrase ‘which attract a lot of people’ should be defined, and it is suggested that it reflect the advice contained at PPG6 paragraph 2.18 (J Sainsbury's Plc).

Response W:

Not accepted, PPG6 does not define ‘key town centre uses which attract a lot of people’ this Para just gives examples of key town centre uses whether or not they attract a lot of people, it is proposed to amend the policy to give examples.

Objection X:

The sequential preference introduces unnecessary tiers and should more accurately reflect the sequential approach in paragraph 1.11 of PPG 6 (J Sainsbury's Plc).

Response X:

Accepted in part – PPG6 refers to ‘Key Town Centre uses which attract many people’, but it does not define these; it just gives examples. It is proposed to amend the plan giving examples. In London, it is necessary to apply the sequential approach in a manner, which reflects its unique categories in its town centre hierarchy in RPG3. RPG3 states that the sequential approach in London “needs to be applied with care as London has many centres performing different functions”. Because of this, all of the Boroughs produced supplementary strategic advice on Town Centres in 1996,

which the Lambeth Deposit UDP policies and several other London borough UDP policies, endorsed at public inquiries, have been based.

Objection Y:

There is a need for more shops and facilities in North Lambeth for the benefit of residents, Add at the end 'and retail development at Vauxhall Cross/Kennington Lane easily accessible from the landward side of the railway viaduct' (Jim Nicholson of Vauxhall Society).

Response Y:

Not accepted – this is not the appropriate place for this. See changes to policy 4 and table 3.

Objection Z:

How will 'a net unacceptable impact' be assessed? How will a 'consistency of scale and function' be determined? (Allsop Verill)

Response Z:

Not accepted – PPG6 gives no definition of this although there is a long series of precedents at appeal, it depends upon a range of factors including the scale of impact and the resilience of the centre to stand up to that impact. Net unacceptable impact would, obviously, be effected where a proposal would go beyond the absorption of available expenditure and therefore impact both the viability and regeneration of the centre and surrounding centres. Consistency of scale and function will reflect the current town centre use make-up of the centre as well as the aspirations for the centre, potential for growth, the catchment area and other material factors.

Summary of Representations & Responses (Paragraph 4.6.8):

Objection A:

The wording is unclear. If this is to be applied to control development then it should be clearly expressed in the appropriate policy rather than in the accompanying text. (Zbig Blonski – Borough Planners Service, Wandsworth Council)

Response A:

Accepted – this paragraph has now been absorbed into the body of the Policy.

Policy 6 Development of Brownfield Sites

Summary of Representations & Responses (Policy):

Objection A:

Although the Agency recognises and supports the need to re-use developed land for new developments, this should be balanced with the need to protect and enhance local biodiversity. (Environment Agency)

Response A:

Accepted – change made.

Objection B:

Allotments, parks, playing fields should not be described as 'Greenfield' sites as they are developed lands and should be seen as such. Therefore, subject to appeal they should be sacrosanct. The sensible way to treat this land is (subject to legislative constraints) as open space that is neither 'Brownfield' nor 'Greenfield', simply available for development only in extremis, and ideally inalienable land. (Chris Cossey, I D Adams of Manor of Kennington Residents Association)

Response B:

Part accepted – the definition of brownfield land is set nationally by the government in PPG3 in relation to housing. Allotments, parks and playing fields, in accordance with government policy PPG17 of June 2002, are green open spaces yet may contain certain urban features such as paths, pavilions or buildings. However they are excluded from the definition of brownfield land and, in accordance with PPG17, can not be developed unless it is demonstrated through an open space strategy that there is a surplus of such facilities in the area. Indeed this is not in itself enough to allow development but would only indicate viability. The wording of the policy and supporting text has been changed to reflect this.

Objection C:

Policy should be more forceful in its promotion of Brownfield land, perhaps going as far as establishing a local presumption in favour of development of Brownfield land for housing development. (Giles Atkinson of House Builders Federation, Terry Fuller of Bryant Developments, Mark Brown, Eaton Square Garages Ltd)

Response C:

Not accepted – this would cut across other policies in the plan on housing and on protecting employment land for which there is still demand and this is already dealt with in PPG3. There is no justification in national policy for such a presumption on land for which there is demand for other land uses.

Objection D:

Policy should be amended to allow the development of Greenfield sites 'out of sequence' where a substantial amount of affordable housing can be realised, as the costs to an RSL of building affordable housing on Brownfield sites can often be prohibitive (Rose Sandell of LAMHAG).

Response D:

Not accepted – this sort of approach may or may not be appropriate in non-London authorities that are developed in a strict sequence. This does not apply in Lambeth where it is not practical to include such a rigid sequence. Instead brownfield sites are strongly prioritised in accordance with PPG3.

Objection E:

The wording of this policy does not provide sufficiently for maximising opportunities for mixed-use development on Brownfield sites. (Level Properties Ltd, Eaton Square Garages Limited)

Response E:

Not accepted – mixed-use developments are promoted by policies throughout the plan, particularly Policy 20.

Objection F:

Sustainable development cannot be achieved if the only criteria regarding brownfield sites are that development be maximised. This will encourage border-to-border high-density development with no regard for open space. This policy should be expanded to incorporate the main points of the definition of Previously Developed Urban Land, which appears in the Glossary (Anne Burke and Marina Thaine of County Hall Owners and Residents Association)

Response F:

Accepted – change made.

Objection G:

Policy should be backed up by a survey identifying all brownfield sites (Jim Nicholson of Vauxhall Society)

Response G:

There has been – the National Land Use Database.

Objection H:

Policy fails to acknowledge that sites, which have lain derelict for a number of years, have often become covered with vegetation, providing important wildlife habitats. And welcome green spaces in densely built up areas, making an important contribution to the local quality of life. (Judy Bartlett and Roger Evans of Lambeth Environment Forum)

Response H:

Accepted – in that land restored to nature does not qualify as brownfield sites and can be considered as a greenfield site.

Summary of Representations & Responses (Paragraph 4.7.1):

Objection A:

Should mention that national definition excludes land restored to nature (Mayor of London)

Response A:

Accepted – change proposed (see response H above).

Objection B:

The supporting paragraph should set out that the main priority will be to use the land for housing in accordance with the government's targets. (Peabody Unite)

Response B:

Not accepted – would conflict with Policy 1 which sets out the main priorities of the plan, which includes housing.

Policy 7 Protection of Residential Amenity

Summary of Representations & Responses (Policy):

Objection A:

The policy refers to 'predominately residential areas' and 'mixed use areas' without identifying where these are and defining the criteria. (Michael Ball of Waterloo Community Development Group)

Response A:

This is a matter of common sense and judgement, it would be impractical to define them all on a map.

Objection B:

In Waterloo, pressure on infrastructure already has a very material impact on residential amenity. (Roger Woodley of Lambeth Estate Residents Association)

Response B:

Noted – this policy seeks to address this.

Objection C:

There is a need to demonstrate that the protection of the interests of those who will live within or close to any approved developments is a key consideration in determining planning applications. (John How of Clapham and Stockwell Town Centre Board)

Response C:

Noted – concern about how the plan is implemented rather than the content of the plan itself.

Objection D:

Policy is unnecessarily restrictive and could stifle innovative development proposals and fails to take into consideration the benefits of the security, services and enhanced public transport provision that can be achieved through mixed-use schemes. (Level Properties Ltd, Mark Brown, Eaton Square Garages Ltd)

Response D:

Not accepted – it covers basic planning issues, and in an open-ended way, in terms of how developers address them.

Objection E:

Policy should be reworded to "The right of people to the quiet enjoyment of their homes will be respected" (J Clyne)

Response E:

Accepted – the proposed minor changes to the wording carries out the same intention as that in the draft policy, which is to comply with the wording of the Human Rights Act 1998, with particular relevance to Part I: The Convention (Article 8 – Right to Respect for Private and Family Life) and Part II: The First Protocol (Article 1 – Protection of Property) of the Act.

Objection F:

Policy should directly refer to the health of residents living on main roads and act to reduce levels of pollution and noise to meet EU targets (Gorden McDougall of Kennington Association)

Response F:

This matter is covered by Policy 48.

Objection G:

Policy should refer to limiting the spread of conversion from A1 to A3 use to protect residential amenity on the grounds that most of Lambeth's shopping areas are predominantly residential areas rather than commercial. Where conversions from A1 to A3 are allowed, and where there are purpose-built residential premises above, the A3 use must be conditional on tough sound-proofing measures to be agreed with the local authority and that normally permission

to operate would not extend beyond 12 midnight (Councillor Brian Palmer of Lambeth Liberal Democrat Group).

Response G:

This matter, and the response to the objection, is covered in detail in Policy 29 specifically on food and drink uses, it would be duplication to include it here.

Objection H:

Concern over erosion of residential amenity (Albert Square and St Stephens Residents Association, Vivian Aylmer).

Response H:

Noted – this policy is designed to prevent such erosion of amenity.

Objection I:

Protection of residential amenity also needs to incorporate commitment to monitor and enforce conditions imposed for the protection of residential amenity (Anne Burke and Marina Thaine of County Hall Owners and Residents Association)

Response I:

Lambeth has such a commitment, this is a matter for implementation of the plan however rather than policy content.

Objection J:

It is not very satisfactory to have protection of residential amenity split across several policies. Protecting residential amenity is a key plank in Lambeth's vision, and as such should be comprehensively covered in a single policy (Anne Burke and Marina Thaine of County Hall Owners and Residents Association).

Response J:

Not accepted – this is a general policy considered appropriate, however many, many policies in the plan have amenity implications and it would be impractical for one policy to cover all such issues.

Objection K:

A major increase in through traffic, as the direct result of the introduction of Red Routes is the greatest single cause of concern in this Association's area at present, and is causing a considerable loss of residential amenity (Vivian Aylmer).

Response K:

Noted – the plan contains policies, such as Policies 11 and 48, designed to reduce this.

Summary of Representations & Responses (Paragraph 4.8.1):

Objection A:

Missing Policy - Home Zones - a policy supporting Home Zones needs to be included. (Brixton Area Forum Board)

Response A:

Now included as part of policy 14.

Policy 8 Accessible Development / Integrated Transport

Summary of Representations & Responses (Policy):

Objection A:

Should require increased facilities for buses. (Mayor of London)

Response A:

Accepted - change proposed.

Objection B:

The term 'acceptable level of service' needs defining. (Walford Maritime Ltd, Pension and Life Insurance Plan, St George South London)

Response B:

Not accepted – the regulators e.g. TfL and the Strategic Rail Regulator all set standards for acceptable levels of service as part of franchises.

Objection C:

The policy and supporting text should make clear that any contributions or improvements relating to access and integrated transport should meet the requirements of Circular1/97, Planning Obligations (Fairclough Homes Ltd, St George South London)

Response C:

Not accepted – the plan already says this in its new planning obligations policy (Policy 50a).

Objection D:

Policy must provide an opportunity for applicants to contribute to improvements to the local infrastructure (John How of Clapham and Stockwell Town Centre Board)

Response D:

Noted – this is precisely the aim of the policy.

Objection E:

The un-quantified 'Developer Contributions' to increase the capacity of the public transport network requires further clarification to ensure that no unreasonable requirements are placed on development proposals (Mark Brown)

Response E:

Not accepted – see response C above.

Objection F:

The 'whole community' needs to be defined - is this the local community, the whole borough, the London community? This policy should concentrate more on achieving improved public transport, rather than emphasising where to locate development. (Anne Burke and Marina Thaine of County Hall Owners and Residents Association)

Response F:

In this context, the whole community means everybody who lives, works and visits Lambeth. The Council has only limited powers to affect the service provided by public transport operators, but can encourage its use by encouraging development into areas with good public transport access. National planning policy is to locate development attracting a lot of people in highly accessible areas, such as Waterloo.

Objection G:

Policy lacks reference to access for disabled people and vulnerable pedestrians. (Brixton Area Forum)

Response G:

Accepted – amendment proposed.

Objection H:

Policy is ambiguous with respect to "private transport" - which could include bicycles. (Brixton Area Forum)

Response H:

Accepted – amendment proposed.

Objection I:

Policy omits reference to ensuring access on foot and by bicycle. (Brixton Area Forum)

Response I:

Accepted – amendment proposed.

Objection J:

New residential development should have off-street parking, Road hierarchy is utter nonsense. (Gordon Johnstone of Methley, Milverton, Radcot, and Ravensdon Streets Residents Association)

Response J:

Not accepted – the hierarchy has been developed following extensive public consultation. Government policy in PPG13 means that planning authorities can no longer insist on off-street parking.

Objection K:

The Council must identify appropriate cut-off points for the preparation and submission of such measures as it is not appropriate for those planning very small scale development to undertake the level of work and proof set out in (d) (Alsop Verrill)

Response K:

Accepted – policy 9 has been amended to further specify the types of development that would require a Transport Assessment. The Council will also be producing new supplementary planning guidance, in order to provide further guidance on this point.

Policy 9 Transport Impact

Summary of Representations & Responses (Policy):

Objection A:

Add to first part requirement for assessment of the impact on the demand for and operation of public transport. (Mayor of London)

Response A:

Accepted – change proposed.

Objection B:

The criteria for TA's, including on what scale of development they will be required, should be set out explicitly as the current criteria are too vague and likely to lead to ad-hoc decisions (Chelsfield Plc, CLS Holdings Plc, St George South London, Alsop Verill)

Response B:

Accepted – changes proposed including producing supplementary planning guidance to set these thresholds.

Objection C:

Policy should be changed to specifically refer to large developments of over (say) 1000sqm (Jeremy Hammerton and John Adams of the Clapham Society)

Response C:

Accepted that the guidance should be more specific – changes proposed including producing supplementary planning guidance to set these thresholds.

Objection D:

The applicant should submit the TA, not the developer. (Jeremy Hammerton and John Adams of the Clapham Society, John How of the Clapham and Stockwell Town Centre Board.)

Response D:

Accepted in part- 'developer' changed to 'applicant'.

Objection E:

Terms "unacceptable" and "contributing to a transport capacity shortfall" should be better-defined. (Michael Ball of Waterloo Community Development Group, Michael Ball of Vauxhall Neighbourhood Housing Forum)

Response E:

Not accepted- The term 'unacceptable' has the ordinary language meaning of the term, as interpreted by common law and common sense. Transport capacity has the same with acceptable levels of overcrowding etc. set by the regulators.

Objection F:

Policy needs to be strengthened to state who decides whether 'developments are likely to have a transport impact' - the local authority or the applicant, and whether this can be challenged (John How of the Clapham and Stockwell Town Centre Board)

Response F:

Not accepted - It will ultimately be the local planning authority who makes this decision – as in all applications. The applicant has the right of appeal, however, so that the final decision could rest with the Planning Inspectorate or the Secretary of State upon appeal.

Objection G:

The wording of the policy is unduly prescriptive and should be revised in accordance with PPG13 and the governments good practice advice on transport assessments. (London Electricity)

Response G:

Accepted – however there is no government good practice guidance on the content of transport assessments.

Objection H:

Policy should cover impact of vehicle noise. (Gordon McDougall of Kennington Association)

Response H:

Not accepted, as the policy already requires this as an integral part of the impact on the 'environment'.

Objection I:

All large traffic flow modifications should provide an environmental impact assessment (Gordon McDougall of Kennington Association)

Response I:

Not accepted as the requirements for environmental assessment, and their contents, are set by statute, and this covers both highway works (and where assessment is required permitted development rights are withdrawn) and also impact on noise etc. as a required part of the assessment.

Objection J:

The requirement to produce a Travel Plan should be deleted from Policy 9 and, if necessary replaced with wording that offers greater discretion. (Frogmore Investments Ltd)

Response J:

Partly accepted- An amendment is proposed referring to the requirements of national policy (i.e. PPG13)

Objection K:

Policy incorrectly relies totally on developers to assess transport impact, and contains no follow-up or monitoring provisions to ensure the TA findings were correct (Anne Burke and Marina Thaine of County Hall Owners and Residents Association)

Response K:

Not accepted - The Council will always assess the transport impact of a development itself. Sites may also be monitored following completion and included within a London-wide database so that future predictions become more accurate.

Objection L:

Policy should specifically emphasise that developments within the council, and on council owned property, are also subject to the TP requirements (Brixton Area Forum)

Response L:

Not accepted. Policy relates to all development whether on Council or privately owned land and property. Lambeth, to set an example, has prepared its own travel plan.

Objection M:

Policy is also not explicit enough about the need to resist developments that will generate traffic. The second paragraph of this policy should be amended to read: "Developments that lead to a significant increase in traffic will generally be refused" (Brixton Area Forum)

Response M:

Accepted – change made.

Objection N:

Policy should be reworded to require that developers provide a full assessment of their proposals on each major transport mode (walking, cycling and public transport) with every application. (Jonathan Leake of Lower Streatham Neighbourhood Watch and Residents Association)

Response N:

Noted- This is precisely what the policy requires.

Objection O:

Reword policy to commit Lambeth to incorporating measures that will favour sustainable transport into all major highway and road improvement and repairs (Jonathan Leake of Lower Streatham Neighbourhood Watch and Residents Association)

Response O:

This matter is covered by Policy 11.

Objection P:

The policy does not address the issue of improving public transport provision in under-provided areas and will only serve to enlarge the disparity between areas with good public transport accessibility and areas with poor accessibility (Roger Evans of Walk First in Lambeth)

Response P:

Not accepted – this is because planning law operates on the principle of material harm. There is no requirement on development located in areas with good public transport accessibility to improve public transport in areas with poor accessibility.

Objection Q:

Should set out what are requirements for when travel plans are needed. (Chelsfield, CLS holdings)

Response Q:

The requirements for when travel plans are needed are set out in PPG13 and a reference has been added to the policy referring to the requirements of national policy.

Objection R:

Put 'Introduction of home zones over a wide area' as a separate item further up. Add 'Introduction of simpler parking restrictions, such as prohibition of non resident parking for an hour in the middle of the day (staggered in areas to provide for full time employment for enforcers), together with more 20min waiting areas near small shops and cheaper and easier provision for trades people delivering or providing services.' (Vauxhall Society)

Response R:

These are matters covered by policies 11 and 14. Exact hours and charging matters for parking controls is not a land-use planning matter that can be covered by a development plan.

Summary of Representations & Responses (Para 4.9.6):**Objection A**

Amend second sentence to clarify that the transport assessment should not be seen in isolation (Mayor of London) (Also rewording proposed by Brixton Area Forum Board)

Response A

Accepted – change proposed

Summary of Representations & Responses (Para 4.9.9):**Objection A**

We suggest the removal of the word 'ideally' in sentence 4, Para 4.9.9. (Brixton Area Forum Board)

Response A

Accepted – change made

Policy 10 Walking & Cycling

Summary of Representations & Responses (Policy):

Objection A:

Suggest improved wording of one sentence. (Government Office for London informal comment)

Response A:

Accepted- amendment made.

Objection B:

Should make clear that walking routes should connect directly to surrounding area, and require safe and direct cycle routes and cycle parking (Mayor of London)

Response B:

Accepted, however the existing wording can be adapted to cover this point to avoid duplication in the policy. Cycle parking is covered in policy 14 and in line with the philosophy of the plan to avoid duplication and avoid two policies covering identical matters it would be duplication to cover it again.

Objection C:

Proposed cycle route along Queen's Walk should be deleted from the Proposals Map. (Mike Mc Cart of South Bank Centre, London Eye Company, Howard Simmons of South Bank Employers Group, John Langley of Royal National Theatre)

Response C:

The Proposals Map does not show a cycle route along the riverside walk, the confusion arises from the similar colouration of Archaeological Priority Areas. The Thames towpath is not a designated cycle way- the national cycle route currently runs along parallel roads. The towpath is mainly in various private ownerships, but is used informally for cycling. It is a long-term aspiration that the towpath is designated as a cycle route, and therefore it is marked as a proposed route on maps of Lambeth's cycle network. The towpath would need to manage the needs of both pedestrians and cyclists, although the detail will vary according to circumstances.

Objection D:

Question as to whether the proposed network of safe cycle routes in Streatham corresponds with desired lines for travel. Opportunities exist for improvements in the narrowest sections of the A23 between the Streatham Odeon and St Leonard's junction, using Railtrack-owned land between Sunnyhill and Gleneldon Roads. Improvements as part of an integrated redesign of the Rookery car park area and the reclamation of the former road surface of the closed stretch of Streatham Common South. (Robert Doyle of the Streatham Society)

Response D:

This would involve a route along operational railway land and is considered difficult and impractical as well as raising safety concerns.

Objection E:

Need for better co-ordination with the London Borough of Wandsworth to look at possible cycle routes impacting on the eastern edge of Tooting Bec Common. (Robert Doyle of the Streatham Society)

Response E:

Noted – this is ongoing

Objection F:

Second paragraph should be amended to require that cycling routes also be well marked and well lit, not just walking routes. (Brixton Area Forum Board)

Response F:

Accepted – change made, as refers to cycles the change is best made to part b however.

Objection G:

Second paragraph should make clear that new developments would be taken as an opportunity to create new rights of way for pedestrians and cyclists. (Brixton Area Forum Board)

Response G:

Accepted – changes made. This is what Lambeth is doing and what is the firm intention of the policy.

Objection H:

Policy must be backed up by firm commitments from Lambeth that it will create cycle routes along or close to every major highway. So that in the case of the A23, it will work with the Mayor for London to make the A23 and similar roads cycle friendly by 2008). Lambeth commit's itself to creating a network of on and off-road cycle routes around the borough that would enable anyone who wishes to cycle between any two points to do so mainly on cycle routes (by 2010). Lambeth will employ cycling consultants and experts to advise how best to achieve the above and to build the best quality affordable cycle facilities. (Jonathan Leake of Lower Streatham Neighbourhood Watch and Residents Association)

Response H:

Accepted – change made.

Objection I:

Pedestrian routes and crossings should be on the level and as direct as possible, following desire lines, and at road junctions, not down the road from them. Cycle routes should provide safe ways across junctions and not go a long way around them. (Jim Nicholson of Vauxhall Society)

Response I:

Accepted in part – amendments are proposed to cover these underlying principles however the amendments proposed are too detailed.

Objection J:

Policy should specifically ensure that pedestrians are given priority in car parks by providing direct and separately constructed footways along desired lines and through the provision of appropriate pedestrian crossings. Avoid polluted and noisy places. (Roger Evans of Walk First in Lambeth)

Response J:

The intention behind the objection is accepted, however it is not always practical to have separate footways in all car parks. This could also be a matter of excessive design detail in the policy.

Summary of Representations & Responses (Para 4.9.13)

Objection A:

This paragraph needs to reflect the needs of those without access to a car or convenient public transport; this item needs strengthening (Roger Evans, Walk First in Lambeth).

Response B

Accepted – suggested change made.

Policy 11 Management of Road, Bus & Freight Networks

Summary of Representations & Responses (Policy):

Objection A:

Distinctions should be made in the order as to whether it relates to arterial or residential roads. The hierarchy should be altered to make 'public transport' 2nd place in arterial roads and 'residents cars' put before 'public transport' on residential roads (Jeremy Hammerton and John Adams of the Clapham Society)

Response A:

First part accepted, amendment proposed, however it is still considered essential to give public transport priority as this can get caught up in traffic on busy residential roads.

Objection B:

Public transport should have a much higher priority (Margaret Ross-Bell of Clapham South Neighbourhood Association, John How of Clapham and Stockwell Town Centre Board)

Response B:

Not accepted – public transport is given a high priority but pedestrians are the most vulnerable road users, and accordingly have been given the highest priority on road safety grounds.

Objection C:

There are no sites identified and safeguarded in the Plan for freight facilities related to rail (Stephen Atkins of the Strategic Rail Authority)

Response C:

The Strategic Rail Authority has not identified any sites as being of strategic importance for freight within Lambeth. Lambeth currently has no freight facilities relating to rail or freight sidings. They have all been developed. In Lambeth rail tracks are predominantly in viaducts and cuttings creating limited scope for new freight facilities.

Objection D:

Should take into account the effect of road developments on the likelihood for increased crime, particularly applies to planned road closures (Rev. Charles Cotton of St. James Vicarage, Helen Fisher of Clapham Park Project – New Deal for Community)

Response D:

Accepted – amendment made.

Objection E:

Hierarchy focuses on healthy young people and ignores needs of unfit, elderly and mildly disabled people who need cars (Jane Pickard, J H Ward)

Response E:

Not accepted – these groups have equal priority when on foot or travelling by bicycle or public transport. Emergency service vehicles and people with restricted mobility are covered by separate legislation processes.

Objection F:

People with luggage need some short and long stay parking near stations (Jane Pickard)

Response F:

This matter is covered by policy 14 under parking at stations.

Objection G:

Kings Avenue/Bedford Road should be placed within London's Distributor road network, given its use and key links with Lambeth's Strategic Road Network (John How of Clapham and Stockwell Town Centre Board)

Response G:

Not accepted – London Distributor Roads perform the function of distributing traffic between the parts of London, rather than between localities within a borough. These roads perform the latter function. The Clapham Park Project is also seeking to reduce the severance effect of these roads, which would be difficult, if they were increased in grade.

Objection H:

Last sentence of part (A) should be amended to specifically require traffic management measures to be implemented to reduce traffic flows on roads where people live (J Clyne)

Response H:

Amendment proposed to this effect.

Objection I:

Policy needs to specifically address the negative impact and severance that the South Circular creates on the adjacent Clapham Park community located on either side of the road (Helen Fisher of Clapham Park Project – New Deal for Community)

Response I:

This is a matter of excessive detail for the UDP. It is best covered in the forthcoming masterplanning exercise for Clapham Park.

Objection J:

Bus lanes to be only operational from 7 -10 a.m. and 4 -7 p.m. (Leah Levane on behalf of Streatham Partnership Board)

Response J:

Not accepted – development plans can only deal with traffic management matters, as far as they relate to the use and development of land. This is a matter that needs to be dealt with in a more detailed transport plan for Streatham.

Objection K:

For roads whose status has changed following adoption of the UDP, there should be a review of the adequacy of traffic calming and traffic management measures (Robert Doyle of the Streatham Society)

Response K:

Noted – this will be carried out in the Boroughs more detailed transport plan which sits alongside the UDP.

Objection L:

There is no mention of creating more 'home zones' in high density residential areas to compliment and enhance open spaces (Edith Fekarurhobo of Waterloo)

Response L:

Accepted – See proposed changes to policy 14.

Objection M:

The restriction of new accesses or increased use of existing accesses needs to be extended to protect nearby streets from inheriting the resulting environmental and congestion problems (Anne Burke and Marina Thaine of County Hall Owners and Residents Association)

Response M:

This is covered by the section on local access roads and traffic management on these roads.

Objection N:

There should be increased bus priority through Brixton, Herne Hill, and Loughborough Junction, and improvements to the current arrangements for bus stops, including co-location for stops, which share a destination. A safer location of bus stops where queues do not block the pavements, and access points relocated so that they don't disrupt bus stops (Brixton Area Forum Board)

Response N:

Important points, but too detailed for inclusion in the plan and these matters are the responsibility of Transport for London. It is proposed to amend the policy however to refer explicitly to bus priority measures.

Objection O:

Third paragraph should be drafted in way that implies that priority will be given to pedestrians moving along as well as across roads at "key crossing points" on road networks (Brixton Area Forum Board).

Response O:

Accepted- change made.

Objection P:

Space should be reallocated away from cars and for pedestrians in the busy shopping areas, such as both sides of Brixton, to make the area safer and to make the shops more attractive for shoppers (Brixton Area Forum Board)

Response P:

Accepted –change made.

Objection Q:

It is unclear what operational use will be made of the hierarchy in (B) in development control and highways decisions, since section (A) makes clear that this hierarchy will not be followed on the TLRN and LDRN (Brixton Area Forum Board)

Response Q:

Accepted – change made.

Objection R:

Part (C) should specifically discourage freight from all but the TfL Road Network, and discourage developments that require the HGVs to travel through residential areas, and through unsuitably narrow streets (Brixton Area Forum Board)

Response R:

Accepted in part – however it might sometimes be necessary for freight to use London Distributor Roads, which also have a role in distributing freight.

Objection S:

Main roads in London are residential and residents should have priority (Jim Nicolson of Vauxhall Society)

Response S:

Accepted in part – amendments strengthen the measures and priority to be given to pedestrians however the role assigned to these roads in the Major's transport strategy must also be recognised.

Objection T:

Public transport is available to all, including people less mobile than cyclists, so should have priority over cyclists (Jim Nicolson of Vauxhall Society)

Response T:

Not accepted – cyclists and pedestrians are more vulnerable and so must be protected.

Objection U:

Removal of gyratories should be a priority: they cut up areas and discourage walking and cycling (Jim Nicolson of Vauxhall Society)

Response U:

Noted – this is exactly the intention of the policy.

Objection V:

This hierarchy needs to set priorities by mode of transport as the list is confusing in that it mixes vehicle types and classes of people – primarily pedestrians (including elderly, poor, disabled) should come first (Roger Evans of Walk First in Lambeth)

Response V:

Not accepted –walking and cycling are valid modes of transport. Pedestrians and cyclists can be vulnerable and therefore need to be given priority.

Objection W:

We strongly urge that disabled people possessing a disabled badge for use in a private car should be given due priority (J Clyne)

Response W:

Accepted – but people with restricted mobility are covered by separate legislation processes.

Objection X:

Needs to include a new cycle route between Sunnyhill and Gleneldon roads on Railtrack Land. (Streatham Society)

Response X:

Not accepted – this is on private land and would be difficult and expensive, as well as introducing a potential public safety and community safety problem, including from introducing a path to the rear of people's gardens.

Summary of Representations & Responses (Para. 4.9.16):

Objection A

Should refer to the impact on local servicing and the operation of the A23 that reallocation in favour of public transport could cause (Mayor of London)

Response A

Accepted, amendment proposed.

Objection B

Needs to be amended to read: "Lambeth is working with TfL to provide much greater pedestrian priority and comfort in areas of high pedestrian activity" (Brixton Area Forum Board)

Response B

Accepted change made.

Summary of Representations and Responses (Para. 4.9.17)

Objection A

Should mention planned bus improvements (Mayor of London)

Response A

Accepted – change proposed.

Policy 12 Strategic Transport Hubs & Transport Development Areas

Summary of Representations & Responses (Policy):

Objection A:

Add more detail on quality of design of transport interchanges (Mayor of London)

Response A:

Accepted – change proposed.

Objection B:

Waterloo Project Board be given the remit to allocate funding for infrastructure improvements, including station improvements, then define the level of funding and particular project to be allocated funding (Richard Coburn of Railtrack)

Response B:

Not accepted. It is not the place of the development plan to set details of project expenditure on planning obligations. This is the role of more detailed operational plans. Also legally planning obligations can only be made in law to the local authority, not to a third party. It is then the role of the local authority, through its partnership arrangements, to arrange for payments on programme expenditure.

Objection C:

Unclear which sites are covered as part of "Waterloo Station and around" (Michael Ball of Waterloo Community Development Board)

Response C:

Major development opportunities, which are part of the transport development area, are identified on the proposal map.

Objection D:

Unclear which sites are covered as part of "Vauxhall Cross" (Michael Ball of Vauxhall Neighbourhood Housing Forum)

Response D:

Major development opportunities, which are part of the transport development area, are identified on the proposal map.

Objection E:

Unclear what is being permitted for these areas other than "high-density development" (Michael Ball of Waterloo Community Development Board)

Response E:

The appropriateness of the uses proposed will be assessed against the other policies of the plan, i.e. the presumption in favour of residential development, requirement for mixed uses, office uses permitted in certain locations etc., and in particular the special policies for the area in part B of the plan.

Objection F:

Unclear how the developer contributions referred to are to be sought fairly (in accordance with the advice set out in Circular 1/97) to resolve the problems caused by the increased pressures on public transport capacity. (Michael Ball of Waterloo Community Development Board, Michael Ball of Vauxhall Neighbourhood Housing Forum, Fairclough Homes Ltd, Fairview Homes Ltd, Level Properties Ltd, Mark Brown, St George South London, Strategic Partners UK Fund 1 Ltd, J Sainsbury's Plc)

Response F:

Not accepted - Para 2.4.8 states that planning obligations will be secured in full compliance with the law and having full regard to national policy contained in Circular 1/97. Special policies in part B of the plan make clear what are the public transport priorities and capacity restrictions that must be overcome in each of these areas.

Objection G:

Tulse Hill should be included as a strategic Transport hub (Diane Miller, Adrian Venditti, Ruderick D. Brown, Kanti Patel, Jane Pickard, Peter MacDonald)

Response G:

Accepted – amended accordingly.

Objection H:

We would like to emphasise that a Transport Hub should be designed to take into account the needs for convenience, public safety, and regeneration without adversely affecting the character of the area, particularly in Brixton (Brixton Area Forum Board)

Response H:

Noted – other policies in the plan, especially in part B of the plan, deal specifically with the issue of local character, including the character of Brixton, and it would be duplication to repeat these here. The plan must be read as a whole.

Objection I:

Plan should provide for better transport for the Tulse Hill part of Lambeth, most importantly better transport along the South Circular, more effective use of Tulse Hill station as a focus for local railway services, better transport from this area to Brixton, and changes to the local road network to promote bus use (Adrian Venditti)

Response I:

Accepted in part. Tulse Hill has been identified as a Strategic Transport Hub in the policy. However, the scope of the objection covers matters in other policies and in a too detailed manner for a development plan. Development plans for example cannot deal with frequencies of service on individual bus routes.

Objection J:

Developments on sites near Lambeth Estate should be moderate rather than high density, and significant developer contributions to improved transport facilities (which must include improvements to the quality of pedestrian routes to and from main public transport hubs) should be required (Mr Roger Woodley of Lambeth Estates Residents Association)

Response J:

Accepted in part – there is scope for high-density development in parts of Waterloo if transport capacity problems are solved. The policy should be read alongside policy 74 that requires such contributions. The policy requires good links to the interchange and an amendment is proposed to underline this.

Objection K:

Policy should introduce the idea of secondary transport interchanges at places like Clapham Common, Herne Hill, Tulse Hill, Balham, Camberwell, and Crystal Palace, though outside the Borough, should also be considered as such (Rev. Charles Cotton of St James Vicarage, Helen Fisher of Clapham Park Project – New Deal for Communities)

Response K:

Accepted – by law though the plan can only cover areas within the borough.

Objection L:

Clapham Common should be added as an area for development because of its already good public transport links (John How of the Clapham and Stockwell Town Centre Board)

Response L:

Accepted in part – it is proposed to include Clapham Common as one of a number of interchanges that are to be improved as well as the strategic transport hubs. The scale of the stations, and the limited scope for associated development however mean that it would not be appropriate to declare it as a strategic transport hub in and of itself.

Objection M:

Requirement that all Major Development Opportunities (as defined on the draft proposals map) should have a mix of land use to include a significant element of housing may not always be appropriate as housing may not fit with the prevailing character of the area; one states that should be where 'appropriate' (3i Plc, Delancy Estates Ltd and Clerical Medical

Investment Management Ltd, Frogmore Investments Ltd, Shell International Petroleum Company and Lend Lease Europe)

Response M:

Not accepted – the suggestion of one objector that ‘where appropriate’ is added is accepted, but the objections of the others that there should not be a basic requirement for mixed uses is not. There are very few sites in these areas that are not suitable for housing, the character of all of these areas is as mixed-use area with significant amounts of housing. In developing these high-density quarters it is essential that this mix is maintained and that they contribute significantly towards meeting London’s pressing housing needs, there is unequivocal and overwhelming evidence of need. The policy is not in conflict with policy 21 as the plan makes clear that large office development is to be expected, in most cases, to be part of a mixed-use scheme (see policy 20 immediately proceeding).

Objection N:

Plans for East London Line and extension of Victoria Line should not downgrade importance of Thames Link as a means for people in the Norwood area to reach the City, Clerkenwell and Kings Cross directly (Jane Pickard)

Response N:

Noted – it will not.

Objection O:

Transport Development Areas should be focussed on areas with poor transport accessibility, not to further improve those areas with already good accessibility (Sheila Freeman)

Response O:

Not accepted – the purpose of the policy is misunderstood. It is not to develop transport in areas lacking in it but to allow development around interchanges in areas with good public transport.

Objection P:

Policy could be expanded to state that developments such as key worker accommodation at Strategic Transport Hubs will be encouraged (Peabody Unite)

Response P:

It is not necessary for every policy of the plan to duplicate the contents of every other policy. For example, key worker housing may be appropriate as may be offices, hotels etc, but each of these are covered by separate policies in the plan and the plan should be read as a whole.

Objection Q:

Development of transport hubs should only be supported if proposals are accompanied by an environmental impact assessment, which shows that local residential pollution levels in excess of EU levels, that adequate safeguards can be made to limit traffic noise and movement so that it does not impact on residents. (Gorden MacDougall of Kennington Association)

Response Q:

As and when environmental impact assessments are required is set by government regulations. In many cases they will require assessment. Impact on pollution and noise is covered by the regulations and is covered by other policies in the plan, which need to be read alongside this one.

Objection R:

Should be a tighter definition of the areas around transport hubs that may be developed in this more intensive way (Councillor Brian Palmer of the Lambeth Liberal Democrat Group, Strategic Partners UK Fund 1 Ltd)

Response R:

Accepted in principle - Major development opportunities which are part of the transport development area are already identified on the proposals map. Defining an area by distance was considered but not included as this would include additional areas, such as wholly residential streets in conservation areas, that would not be

suitable. Also crucially it would add an extra designation to the proposals map in those very areas where it is most cluttered already.

Objection S:

Reference to Brixton Overground Station and the East Brixton Regeneration Arc in this policy is premature and should be removed (Brixton Area Forum Board)

Response S:

Not accepted – The Arup report is much more detailed than the UDP and although consultation work on this is ongoing this is no hindrance to include the commitment in the UDP for transport investment in Brixton. To delete the policy would send all the wrong signals over transport investment in Brixton and would undermine the achievement of the forum's action plan. Also detailed studies need to be anchored in the UDP so that success or otherwise in meeting community aspirations can be assessed. Finally there is a need to include policies so that premature private applications do not undermine these aspirations. Otherwise Lambeth will be left with no proper planning policies for Brixton.

Objection T:

Policy should specifically require transport hubs to be accessible to all (Jonathan Leake of Lower Streatham Neighbourhood Watch and Residents Association)

Response T:

Accepted – change made.

Objection U:

Policy should commit to reducing traffic rather than just minimising it (Jonathan Leake of Lower Streatham Neighbourhood Watch and Residents Association)

Response U:

This matter is covered by Policy 14.

Objection V:

Policy should acknowledge the importance of some public car parking provision to assist drivers to transfer to public transport in order to avoid the congestion charge (National Car Parks Ltd)

Response V:

Not accepted – this would undermine the traffic reduction goal of congestion charging by encouraging people to drive to the cordon boundary. It would also be wrong for this area to be dominated by car parks.

Objection W:

Unclear what sites are covered by policy (Strategic Partners UK Fund 1 Ltd)

Response W:

Not accepted - Major development opportunities, which are part of the transport development area, are identified on the proposal map.

Summary of Representations & Responses (Para 4.9.21):

Objection A:

The Society supports an increase in residential density in commercial areas if Metropolitan Open Land and Scheduled Open Spaces receive the same protection as in the 1995 Unitary Development Plan. (Derek Hoare, Camberwell Society –comments on Southwark Key Issues Paper)

Response A:

Comments on Southwark UDP not on Lambeth's

Objection B:

Please clarify Para. 4.9.21; - Does it mean that only MDO sites are regarded as suitable for high- density development? What about the MDO's in the Waterloo TDA, which are also in the South Bank/Waterloo Conservation Areas? Which has greater priority under this new plan? (Marina Thaine & Anne Burke, County Hall Residents Association).

Response B:

The plan has not identified areas within a geographical radius of the station as a Transport Development Area as not all of this area is suitable for high density development. Only identified development sites are shown. This does not mean that suitable 'windfall' sites may not come forward, if they meet the tests in policy 32 on the density and scale of development. All development in conservation areas must pay special attention to the preservation or enhancement of its architectural or historical character. Parts of some conservation areas have a high density character e.g. County Hall, so this does not prohibit high-density development.

Summary of Representations & Responses (Para 4.9.22):

Objection A:

Refer to new DTLR guidance on this issue (Government Office for London- informal comment)

Response A:

Accepted

Policy 13 Major Public Transport Proposals

Summary of Representations & Responses (Policy):

Objection A:

East London Line extension via Tulse Hill & Streatham would reduce overcrowding at Brixton tube. A branch via Brixton and Clapham would dilute frequency of service on rest of line, so is not supported. Extension of Victoria line to loop at Herne Hill, but not extending to Streatham, which might simply transfer Brixton's congestion to that centre instead. (Brixton Society)

Response A:

Reference to the extension of the Victoria line has been deleted as it is not in the Mayors Transport Plan, and is unlikely to come forward in the lifetime of the UDP. The frequency of service on the rest of the line would not be diluted by the Orbirail proposals.

Objection B:

The sentence "The opportunities along these public transport corridors will be maximised as public transport corridors" does not make sense and needs clarification re-drafting. (Brixton Area Forum Board)

Response B:

Accepted – change made.

Objection C:

Tram should pass through Waterloo, Baylis Road, and on to Kennington Road, thus better joining Lower Marsh/Cut and estates toward Kennington to the South Bank (Michael Ball of Waterloo Community Development Group)

Response C:

Accepted – change made. Route shown on the proposals map now shows the Mayors chosen alignment.

Objection D:

Planned Victoria Line extension should serve Tulse Hill and Streatham (Diane Miller)

Response D:

Not accepted- Reference to the extension of the Victoria line has been deleted as it is not in the Mayors Transport Plan, and is therefore unlikely to come forward in the lifetime of the UDP.

Objection E:

Better transport connections are needed for West Norwood/Norwood (Diane Miller)

Response E:

Noted – Thameslink (see amendment) will considerably improve this.

Objection F:

Extension of the Victoria Line to Streatham is not supported because of existing overcrowding of the line within the city of Westminster (R Handley of Westminster Society)

Response F:

Reference to the extension of the Victoria line has been deleted, as it is not in the Mayors Transport Plan, and is therefore unlikely to come forward in the lifetime of the UDP.

Objection G:

A number of alignment improvements can be made to the proposed tram suggested by one or a number of objectors, south of Vauxhall; including, at Vauxhall a direct turn from Albert Embankment into Harleyford Road. Instead of Brixton, take the tram from Stockwell via Clapham Common then into the South Circular as far as Streatham Hill, then turn south into Streatham; at Streatham Hill, consider a (short-working) branch to Tulse Hill. At Streatham Hill, continue through Norbury to link with Croydon Tramlink. (Rev. Charles Cotton of St. James Vicarage, John How of Clapham and Stockwell Town Centre Board)

Response G:

At the request of the Mayor of London, the proposed route to be shown is his proposed route determined following consultation. These matters should be raised with Transport for London. Lambeth strongly supports extensions of the tram in the future to Clapham and Streatham.

Objection H:

Plans for East London Line and extension of Victoria Line should not downgrade the importance of Thameslink as a means for people in the Norwood area to reach the City, Clerkenwell and Kings Cross directly (Jane Pickard)

Response H:

Noted – However, reference to the extension of the Victoria line has been deleted, as it is not in the Mayors Transport Plan, and is therefore unlikely to come forward in the lifetime of the UDP.

Objection I:

The policy does not make clear that the developer contributions sought will be fairly and reasonably related to the proposed development (Fairclough Homes Ltd, Fairview Homes Ltd, St George South London Limited)

Response I:

Not accepted – see response to similar objections to Policy 12.

Objection J:

Include Thameslink 2000 (J Clyne, Tim Gayner)

Response J:

Accepted – change made. The station at Camberwell is a matter for the Southwark UDP; Lambeth's can only include proposals in Lambeth.

Objection K:

Include extension of the Northern Line from Kennington to Streatham (J Clyne)

Response K:

Not accepted – this is not in the Mayor's transport strategy and so will not occur in the lifetime of the plan.

Objection L:

London Orbi-rail: - including low level platforms at Brixton - and Loughborough Junction - PLEASE INCLUDE, South London Line - high level platforms at Brixton - and Loughborough Junction - PLEASE INCLUDE (Tim Gayner)

Response L:

They are included in the policy - except London Orbi-rail where high level platforms are included at Brixton.

Objection M:

Should only be supported if proposals are accompanied by a favourable environmental impact assessment (Kennington Association)

Response M:

These are a requirement of the regulations and in line with other policies in the plan will be fully taken into account at the time of decision.

Objection N:

Given the limited number of cross Thames slots available to the ELL southern extensions, we suggest that the Council should not pursue ELL services along the South London Line. Instead, we suggest that Lambeth should support improvement to South London Line frequencies as part of the Strategic Rail Authority's wider Orbi-rail project (Streatham Society)

Response N:

The Council supports both the extension of the East London Line through the Borough and improvements to the South London Line frequencies. However, it is not within the Council's powers to direct where the line should go or how it inter-relates with existing rail services. This is within the control of the Strategic Rail Authority.

Objection O:

The UDP should provide that the design of any interim terminus for the Cross River Transit at Popes Road, and proposals for development in the East Brixton Regeneration Arc should ensure that an extension to Streatham remains an engineering possibility (Streatham Society)

Response O:

A proposal for tram stop at Popes Road has been included as a requirement in MDO6 (East Brixton Regeneration Arc.) Extension to Streatham is supported.

Objection P:

Improved transport links by tram and underground deep tunnel connections mentioned in Policy 13 to the south of the borough, including Norwood and Streatham, should be prioritised as these areas are already poorly served (Cllr Palmer of behalf of Lambeth Liberal Democrats)

Response P:

The plan gives priority to both the north and south of the borough. The South because it is poorly served, the north because parts are poorly served and in the medium terms opportunities arise from the tram. The Mayor of London sets specific priorities on specific projects. Where a project has to go through the north of the borough before it reaches the south it would be wrong to prioritise the north of the borough over the south.

Objection Q:

Should encourage development along the new routes, and reduce the need for increased development in the congested centre (County Hall Owners and Residents Association).

Response Q:

Not accepted – this would be contrary to the governments and the Mayor of London's policies to concentrate development in these areas.

Objection R:

Reword Policy to include clear timescales for achievement of each of these projects. Given their complexity and the number of partners involved it should be made clear that these are aspirations rather than commitments. (Lower Streatham Neighbourhood Watch & Residents Association)

Response R:

The Mayor of London and the government will set the timetable. The policy supports these improvements; it does not and cannot 'propose' them.

Objection S:

Add a commitment to re-engineer arterial roads such as the A23 and A24 to favour buses and cycles over cars. All arterial roads should be made cycle and bus friendly as part of a Lambeth-wide policy. (Lower Streatham Neighbourhood Watch & Residents Association)

Response S:

This is a matter considered under policy 11.

Summary of Representations & Responses (Para 4.9.27):

Objection A

Should refer to potential for Stations in Lambeth on the South London Line (Orbirail link to East London Line)

Response A

Accepted – change proposed.

Policy 14 Parking and Traffic Restraint

Summary of Representations & Responses (Policy)

Objection A:

Update and amend reference to disabled persons parking (Government Office for London Informal Comment).

Response A:

Accepted – change made.

Objection B:

We would like to see it reworded so that the principles contained in it are not dependent on the existence of the Mayor's congestion charging scheme (Brixton Area Forum Board)

Response B:

Accepted – change made.

Objection C:

(C)- clarification please -does this mean that parking created for supermarkets must necessarily be open for other car users? E.g. can Tesco's stop me parking in their car park and going to the market? (Brixton Area Forum Board)

Response C:

This can be required on new developments but there is no control over the use of existing car parks.

Objection D:

We would like to emphasise the priority of providing decent, convenient, safe, reliable public transport over private car parking spaces (Brixton Area Forum Board)

Response D:

Noted – this is very much the intention of the restraint based parking standards.

Objection E:

We would like to add, 'obstructing public transport facilities is to be very strongly resisted' to (H) (Brixton Area Forum Board)

Response E:

Accepted – change made.

Objection F:

No introduction of congestion charging. Introduction of adequate and appropriate forms of safe and affordable public transport. (Streatham Vale Property Occupiers Association, Vauxhall Society)

Response F:

Not accepted – the Congestion Charging scheme has been introduced by the Mayor of London not Lambeth. It will pay for significant public transport proposals and parking measures in Lambeth, including Cross-River Transit.

Objection G:

Opposed to parking controls that the Council use, as perceived by many people, for income generation. Opposed to the principle of blanket CPZ's. Support appropriate controls in town centres. (Streatham Vale Property Occupiers Association)

Response G:

Not accepted – by law, any surplus money from Controlled Parking Zones must be invested in transport schemes. All income must be spent on transport measures. Again by law they can only be introduced following public consultation, and Lambeth will only introduce them where there is resident demand. An amendment is proposed to make this clear.

Objection H:

Car parking provision, forming part of the development of the site, should be at an acceptable and viable level -enough to attract the necessary operator and developer (Railtrack)

Response H:

Not accepted – the policy of Lambeth, the government in RPG3 and the Mayor of London is one of strict traffic restraint orientated parking standards. Although a number of amendments are proposed to some standards, overall the degree of restraint has not deterred developers.

Objection I:

We support the restriction on Mini-cab offices. It should have its own lettered paragraph to make it more explicit, instead of hiding it under coach parking (Brixton Society)

Response I:

Not accepted – it is considered appropriate to have one clause covering these two elements, as there is some overlap of requirements.

Objection J:

Taking into account the exceptional range of public transport in Waterloo, there should be no on- or off-street parking of coaches in Waterloo or Upper Marsh or along the Albert Embankment. (Waterloo Community Development Group)

Response J:

Not accepted – Lambeth's severely restrictive policy towards restricting coach parking in these locations is covered in policies 51 and 76.

Objection K:

Within the supporting text there should be a reference to the LPA taking account of the knowledge and experience of the applicant when considering applications which include an element of parking (Lambeth Housing Association Liaison Group)

Response K:

Not accepted – these are maximum standards, and so the applicant can always apply this experience in proposing less.

Objection L:

It is no longer considered appropriate for hospitals or health-care facilities to be subject to rigid car parking standards. Rather, each proposal for development at such sites should be considered on its merits (NHS Executive, London Region)

Response L:

Not accepted – The parking standards in Table 6 allow for minimum operational standards (e.g. for healthcare workers working unsocial hours) and so already includes such flexibility. There is no justification in PPG13 for not applying traffic restraint standards for non-operational healthcare use and the government rejected overtures to this effect when revising PPG13.

Objection M:

Unless one space per dwelling is allowed, illegal parking will increase (Walford Maritime)

Response M:

Not accepted – In inner London traffic restraint will often imply less than one unit per dwelling as historically parking has been provided at much less than this level and otherwise new high density development will lead to a considerable increase in traffic, especially for high buildings. This is doubly important within the congestion-charging cordon where the policy is to reduce traffic levels. It is proposed to amend the standards to allow for 1 space per dwelling for larger properties in areas with moderate or poor public transport accessibility.

Objection N:

Object to the rigid imposition of maximum parking standards in respect of residential development and affordable housing (Fairclough Homes, Fairview)

Response N:

Not accepted – this argument is contrary to government policy in PPG13, which clearly requires plans to apply maximum residential parking standards to developments, unless an applicant can demonstrate that a higher level of parking is needed.

Objection O:

We consider that the requirement for development proposals to have regard to the Mayor's proposals is flawed. As we understand that they are currently still only in draft form and are still a long way from being formally implemented. (Level Properties, Mark Brown, Eaton Square Garages Limited, Manor of Kennington Residents Association)

Response O:

Not accepted –the congestion charging scheme is now in operation.

Objection P:

What 'other uses' for surplus parking does the council have in mind. (Manor of Kennington Residents Association)

Response P:

Any use in accordance with the plan – see in particular policy 15.

Objection Q:

Delete "on local access roads" in Para (E) (J Clyne)

Response Q:

Accepted – change made.

Objection R:

Policy 14 should be amended to encourage car free residential developments in locations that are highly accessible by a choice of means of public transport or that are likely to attract residents with low levels of car ownership (Peabody Trust, Goldcrest, Laings)

Response R:

Accepted – change made.

Objection S:

The parking standards applied to commercial development as set out in Table 6 which is linked with this Policy, are overly restrictive and do not properly reflect the needs of either operators or users of commercial employment premises (Clapham Park Developments Limited)

Response S:

Not accepted – the policy of Lambeth, the government in RPG3 and the Mayor of London is one of strict traffic restraint orientated parking standards. Although a number of amendments are proposed to some standards overall the degree of restraint has not deterred developers.

Objection T:

There should be a presumption against cross over and front garden parking (Cllr David Malley)

Response T:

Not accepted – as this matter is covered by Policy 36(f)

Objection U:

Section B of Policy 14 should contain a caveat whereby a higher level of parking may be acceptable in exceptional circumstances where it is considered both necessary for the development as well as acceptable in terms of traffic impact (Clapham Park Developments Limited)

Response U:

Not accepted – it is not considered appropriate to have policies which include built in 'exceptional circumstances' as the Act already allows other material considerations to be taken into account and once included within policies such matters regularly become the norm.

Objection V:

Insert new heading under policy 14. Off-street parking. Existing off-street parking should normally be preserved for local residents use (Mrs Vanessa Brand)

Response V:

Not accepted – Given government policy in revised PPG3 no longer makes it possible to insist on parking, there is no longer any planning justification to retain off-street car parking.

Objection W:

The policy must be linked to dramatic improvements in public transport and to identifying appropriate parking, at least for that part of Streatham designated as the retail core. (Streatham Partnership Board, Simon Hooberman)

Response W:

The plan has a number of proposals for improving public transport to Streatham as well as development sites such as Streatham Hub where additional parking will be secured. However, the level of service provision offered by public transport operators falls outside the scope of the UDP.

Objection X:

Clearer definitions of the public transport accessibility zones currently set out at Map 1 (Streatham Society)

Response X:

See responses to objections to Map 1.

Objection Y:

Increase of the maximum parking standards in areas of "very poor public transport accessibility" (Streatham Society)

Response Y:

Accepted in relationship to residential – change proposed under table 6.

Objection Z:

Remove the presumption that all affordable housing will be limited to ¾ of the standard number of spaces. (Streatham Society)

Response Z:

Not accepted – government policy in circular 6/98 requires local authorities to be more flexible for parking for affordable housing. Research conducted suggests there is significantly less demand for parking from new affordable housing.

Objection AA:

Suggests complicated rewording which would have the effect of allowing more supermarket parking. (Mrs J Ward)

Response AA:

Not accepted – this would be contrary to the government's and the Mayor's policies to restrict supermarket car-parking.

Objection BB:

Stations outside the Central London Policy Area should therefore be encouraged to provide pick up as well as drop off facilities for private cars, taxis and mini-cabs (Mr J H Ward)

Response BB:

This is what this clause of the policy allows.

Objection CC:

Restraint on traffic should include parking restrictions on coaches in all streets bounded by housing. Traffic speed should be reduced on roads at night to reduce vehicular noise. This should apply especially on main roads that pass through residential areas. Streets bounded by housing should be protected from pollution levels above EU targets. (Kennington Association)

Response CC:

These matters are outside the area of planning control that can only deal with traffic matters in so far as they relate to the development or use of land.

Objection DD:

Allow at least 1 parking space per dwelling in areas with moderate public transport accessibility (Goldcrest)

Response DD:

Accepted – change made under table 6, 1 space now permitted for larger dwellings.

Objection EE:

Policy is considered unduly restrictive. It should allow greater flexibility in the application of the parking standards and have regard to site-specific factors including existing car parking provision. (Delancy Estates Ltd and Clerical Medical Investment Management Ltd, Shell International Petroleum Company and Lend Lease Europe)

Response EE:

Not accepted – parking standards have to be applied strictly and consistently in order to meet government and Mayoral policy on traffic restraint, where there is existing parking there is all the more reason to reduce it.

Objection FF:

Since the London Eye has yet to secure permanent planning permission will a taxi park be required (County Hall Owners and Residents Association)

Response FF:

Yes – as part of the planning permission that has been granted.

Objection GG:

Should have the PPG13 maximum standards which are less restrictive (B&Q, Ridale Developments Limited)

Response GG:

Not accepted – this is a national minimum standard and this and RPG9 and GOL Circular 1/2000 all suggest that London standards will be restricted, as they are in the Mayor's London Plan. Paragraph 53 of PPG13 makes it clear that local authorities may adopt more rigorous standards where appropriate.

Objection HH:

Reword Policy 14 to include a commitment to a range of other measures besides parking controls as a way of restraining traffic. These should include home zones – for which government finance is available, and the re-engineering of streets and traffic flows when appropriate. (Lower Streatham Neighbourhood Watch & Residents Association)

Response HH:

Accepted – change made with respect of Home Zones, other measures already covered under policy 11.

Objection II:

H - Add 'No coach parking will be permitted on the Albert Embankment or in the surrounding streets, except where the coach is exclusively serving an event in the immediate locality (within half a km) (Vauxhall Society)

Response II:

Not accepted as covered by policy 51(a).

Objection JJ:

Sites that await redevelopment may be suitable for temporary parking (National Car Parks)

Response JJ:

Not accepted – this practice undermines traffic restraint and provides commercial incentives to avoid early development of brown field sites – it must end.

Objection KK:

The standards identified in Annex D of PPG 13 distinguish between food and non-food sectors and Policy 14 should follow that advice to reflect the need for a greater number of spaces to serve food retail developments (J Sainsbury's)

Response KK:

Accepted – standard now split.

Objection LL:

Object to the final part of the first sentence of Section B of this policy, where it states "...and may be reduced to this level by condition". We believe that the inclusion of this sentence could stifle regeneration (Prospect)

Response LL:

Not accepted – there is no evidence that this would stifle regeneration, super league tenants typically occupy buildings with no staff parking.

Objection MM:

Allow 1 parking space for 2 bed dwellings (Laings)

Response MM:

Accepted for three bed dwellings, however for two bed dwellings (typical) this would use up too much land in inner Lambeth in particular.

Objection NN

Objection is raised to the proposed maximum standards for retail as the standards are comparable with those of outer London boroughs like Hillingdon rather than other inner London boroughs. They should be reduced in line with those of other inner London boroughs, for example, LB Camden, which has far stricter standards for retail. (Mayor of London)

Response NN

Lambeth is proposing an A1 standard twice as strict as the adopted Camden plan. Max 1/50 in the areas with the worst public transport accessibility, as opposed to 1/25 sqm in the adopted Camden Plan. Examination of the standards applied in similar areas of other Inner London Boroughs shows that Wandsworth has a 1/20 sqm standard, Hammersmith and Fulham has a maximum standard of 1/75sqm, Kensington & Chelsea and Southwark have no clear standard, and Westminster requires no on site parking. The Lambeth standard is much stricter than outer London boroughs that have recently reviewed their plans, e.g. Waltham Forest and Lewisham 1/14sqm. The only exception is Greenwich which has a 1/100sqm standard. Work on the viability of the Streatham Hub proposal has shown however that there can be some tightening of the A1 standard (more akin to the Hammersmith and Fulham Standard), but however the D2 standard is a little too strict which could threaten the viability of the whole scheme. Hence a slight tightening of the A1 standard is proposed and a slight relaxation (outside the most accessible areas) of the D2 standard.

Objection OO

Object to the setting of lower maximum parking standards for key worker housing. (NHS Executive)

Response OO

Accepted – change made

Objection PP

Object to the setting of rigid parking standards for supported/ special needs housing. The extent of support required for each resident in such schemes varies considerably. Therefore the numbers of staff required and the mobility of the residents will also vary considerably. (NHS Executive)

Response PP

It is proposed to add a reference to each case being assessed on a case-by-case basis.

Objection QQ

Increase cycle parking standards (Lambeth Cyclists)

Response QQ

The standards are in line with the London Cycle Network Design Guide.

Objection RR

Table 6 should be amended to allow a more flexible approach by taking into account PPG3, paragraph 60. Parking policies should be framed with good design in mind, recognising that car ownership varies with income, age, household type, and the type of housing and its location; be consistent with the parking requirements of adjacent Boroughs, and avoid

creating disincentives to development within Lambeth. In Wandsworth, parking standards are less restrictive (Grainger)

Response RR

Not accepted – the standards have been framed with this section of PPG3 in mind and do vary in this manner. Wandsworth's standards are a matter for Wandsworth. Lambeth feels its strict approach is necessary to restrict traffic growth.

Objection SS

Within the Central London Policy Area, there are employment sites with excellent public transport accessibility and in such locations the UDP should recognise the appropriateness of applying parking standards closer to those applied within the "Area of Strict Restraint" (Frogmore Investments Limited)

Response SS

Not accepted – this is an inverse logic, slightly less strict standards apply in the 'area of strict traffic restraint' because it is not in Central London.

Objection TT

Table 6 should be amended to include a level of residential parking provision consistent with current UDP standards or the Mayors Transport Strategy (St George South London Limited)

Response TT

Not accepted – the current UDP standards are too high and not restraint based and not in line with current government policy. The Mayor's Transport Strategy did not contain residential parking standards. It contains a reference to an earlier LPAC study, however crucially this study was published prior to PPG`13 and therefore contains higher standards than now permitted.

Objection UU

Object to 'reduce to maximum standard level', could deter super league tenants (Prospect)

Response UU

Not accepted- it has not deterred such tenants who have been prepared to accept little or no parking. Where sites are being redeveloped it is reasonable to look at the issues afresh and not accept an historic level of parking.

Objection VV

The Council must think again about the standard and relate it better to PPG13 (Allsop Verill)

Response VV

Not accepted – as stated under the responses to objection GG the PPG13 standards are national maxima and it states that regionally these should be much more restrictive. This is underlined by RPG9 and GOL circular 1/2000.

Objection WW

Hotel standards are too strict. (London Tourist Board)

Response WW

Accepted in part – the standard has been amended for Central London to be in line with the Royal Borough of Kensington and Chelsea UDP which the Inspector found not to be unduly restrictive and has not deterred hotel investment.

Objection XX

Include a standard for zero-emission vehicles (Lambeth Friends of the Earth)

Response XX

Whilst sympathetic to this point this matter is considered better dealt with in travel plans where it can be assured that the vehicles will be bought and used and fuelling facilities provided. The aim is for low-emission vehicles to gradually take over normal parking spaces.

Summary of Representations & Responses (Para 4.9.29):

Objection A

Revised boundary of Congestion Charging cordon on Harleyford Road would create traffic management problems at a key junction (Mayor of London)

Response A

Accepted – although Lambeth is still awaiting the technical justification for this and the response to its proposals.

Summary of Representations & Responses (Para 4.9.30):**Objection A**

Please clarify if this paragraph is intended to apply to off street parking; if so we object! (National Car Parks Ltd)

Response A

Not accepted – the objectives of congestion charging would be undermined if there was a significant growth of contract parking at or near the congestion charging cordon.

Summary of Representations & Responses (Para 4.9.36):**Objection A**

Take account of the impact of city car clubs on public transport (Mayor of London)

Response A

Accepted – amendment proposed.

Summary of Representations & Responses (Para 4.9.38):**Objection A**

Minicabs can also provide a valuable service and their offices should be carefully integrated into developments where appropriate (Mayor of London)

Response A

Principle accepted, however a slightly different form of words is proposed as minicabs often cause problems – its is necessary to have a balanced approach, otherwise the plan could make it difficult to enforce against mini-cab firms.

Summary of Representations & Responses (Map 1):**Objection A**

Does accessibility in any way reflect the level of unmet demand for services. The Northern Line when coupled with local bus service provision suggests that the area is very well served. This is not the experience when travelling at peak times when apparent exceptional levels of service fall a long way short of current demand. Can this map be 'revisited' to consider access and demand for service to more accurately reflect where, even with apparent excellent provision, there is still a need for further investment (John How, Clapham and Stockwell Town Centre Board)

Response A

Noted - The map only shows the level of accessibility based on distance to public transport nodes (such as bus stops, train stations, etc.) and frequency of service. It uses the accepted LB Hammersmith and Fulham's Public Transport Accessibility Levels method. Impact of development on capacity etc should be dealt with in a Transport Assessment. Station capacity and service frequency is a matter for TfL dealing with public transport at a strategic level. Public transport accessibility is only one of a number of issues that needs to be considered in relation to the location of development.

Objection B

We support the underlying principles of this policy, but we are concerned that the definition of "good or better public transport accessibility" is inadequate. This is important as it affects other policies. The basis on which Map 1 on page 41 has been produced is unclear. It is not clearly referenced. There needs to be adequate public disclosure and consultation on exactly which public transport accessibility model will be used. There appear to be anomalies in the map as currently constructed. It appears to be based only on bus accessibility. Reading the

current map literally, the area around Brixton Bus Garage, north of the Streatham Hill core, would be the best location for intensive development in the south of the Borough. (Robert Doyle, The Streatham Society)

Response B

Noted - The means by which Map 1 has been produced is described in Para. 4.9.3 of the deposit UDP. The map shows relative levels of accessibility provided by all public transport- not just buses. The map uses the accepted LB Hammersmith and Fulham's Public Transport Accessibility Levels method. The map itself was produced by London Transport, and the second deposit UDP will include an updated version (created in 2003). Public transport accessibility is only one of a number of issues that needs to be considered in relation to the location of development.

Objection C

This is an interesting map, we wonder how it has been arrived at. Is it only with reference to bus routes? No part of Streatham has 'exceptional' Public Transport Accessibility, it has no tube station and relatively infrequent rail services. This map is misleading. It is only useful comparing one part of the Borough to another (or perhaps this is its purpose). (Alsop Verill)

Response C

Noted - the Public Transport Accessibility Levels map shows relative levels of access provided by public transport. It has been produced by London Transport, and was updated in 2003.

Policy 15 Additional Housing

Summary of representations and Responses (Policy):

Objection A:

Does it refer to gross or net completions? (Government Office for London Informal Comment)

Response A:

Accepted – change proposed - jit is net.

Objection B:

Why does the figure for large identified sites in Table 7 differ from the results of the London Housing Capacity Study 2000 (Government Office for London Informal Comment)

Response B:

At the time of the London Housing Capacity Study 2000 the Council had not completed the detailed identification of residential development sites. That work was subsequently completed and resulted in an increased figure for large identified sites and a smaller proportion of large windfall sites. More detailed studies in relation to estate regeneration and other sites has indicated that less housing is likely to be achieved than was originally estimated.

Objection C:

Should include 5,000 units from non-conventional capacity included within the London Housing Capacity Study 2000 i.e. empty properties (Government Office for London Informal Comment, Empty Homes Agency)

Response C:

Accepted. Now proposed to be included. However over 2002-2016 as opposed to 1997-2016 the pro-rate figure is 4,000. This is considered too high being based on projecting forward 1992-1996 data. Since then there has been a significant slowdown in provision of such accommodation with nursing homes closing and little key worker-housing being provided as 'cluster' accommodation. There has also been a slowdown in building of student accommodation. 1,500 is considered a more reasonable aggregate figure.

Objection D:

Amend the plan period to 2002-2016 (rather than 17) in line with strategic housing period (Mayor of London)

Response D:

Accepted – change proposed to be made across the plan.

Objection E:

It is commendable that the Borough has increased its housing provision allocation above that in the London Housing Capacity Study 2,000. However, it does raise some concerns in terms of the validation of the figures, consistency of applied methodology and strategic monitoring of future completions. Instead of a borough changing its housing provision figures, it should include the agreed LPAC/GLA figure in the policy. The Council should still include the revised higher figure but in the reasoned justification and explain how it intends to maximize it and by how much in terms of its policies, such as its approach to density and conversions (Mayor of London)

Response E:

Not accepted – the approach suggested by the Mayor would be most confusing and contrary to regional and national policy. Regional and national policy only makes provision for a single dwelling allocation within development plans – not two. Two figures would create enormous problems and difficulties on planning appeals as to the relative status of each.

(Para 4.9). Lambeth has tested its contributions and for the first time has assessed its 'capacity' for additional dwellings in line with the approach advocated in the London Housing Capacity Study and the recent Government good practice guide

on housing capacity studies. As Lambeth did not carry out a rigorous (indeed any) analysis of development sites in the 2000 study, it relied on projecting forward inaccurate and incomplete data and hence does not present a sound or accurate picture for inclusion within a development plan. Failure to include the most up-to-date and accurate figures would be contrary to RPG3 and PPG3 of which the latter states, "all local planning authorities should undertake housing capacity studies." Lambeth's revised figures have recently been tested at an appeal at Union Road where the Inspector concluded they should be achievable. RPG9 and GOL Circular 1/2000 state that the SDS should provide, as a minimum, the figures in the London Housing Capacity Study 2000. However, they simply state that the SDS should set out policies to secure this 'rate of provision' and set out a 'distribution of this overall rate' within London (Para 3.15-3.16). There is no requirement to include directly the London Housing Capacity Study 2000 allocation as if it were a minimum; it is not, simply to ensure that this rate of provision can be met. As a result, the policy is proposed to be amended to make this clear.

Objection F:

We object to Para (B), the blind presumption in favour of housing development at the expense of local employment and amenities. This is a step back from previous Plans (Brixton Society)

Response F:

Not accepted – government and regional policy now requires a positive approach to new housing in urban areas. Previous plans had a vacuum of policy when housing was proposed on sites, which had no other policies applying. The policy must be read alongside other policies protecting the original land use (including employment uses) and requiring a mix of uses.

Objection G:

Table 7 grossly under estimates the contribution of conversions, which are running at a higher level in our own part of the borough. Over 15 years the table figure equates to an average of only 139 dwellings a year. Whilst this will decline as existing stocks are used up, nevertheless current activity suggests 3000+ are more likely over the Plan period (Brixton Society)

Response G:

Not accepted – the figure is from the London Housing Capacity study and is well above current activity. In addition, the impact of de-conversions must be taken into account – these could produce a negative rate in Lambeth.

Objection H:

Figures are unrealistic and will lead to more pressure for conversions and infill if the major sites don't get developed (Simon Hooberman)

Response H:

Not accepted – the figures make allowance for large sites not coming forward. The figures have been assessed in accordance with Government good practice guidance and were considered 'achievable' at a recent planning appeal. They have been reassessed as part of the revised deposit. See also change to para 4.10.5

Objection I:

I would approve plans for additional housing if the number do dwellings targeted (27,000) were cut in half and if new dwellings were spread throughout the borough rather than concentrated in particular areas. More than 50% of housing should be earmarked for key workers (Diane Miller)

Response I:

Not accepted – the figures are considered realistic by the Council and have been revised down in proposed changes to the policy (from 27,000 to 21,000). Sites arise where they arise and cannot be artificially spread around the Borough. The plan includes an affordable housing target of 50% of habitable rooms on qualifying sites – this will include an element of key worker housing, though not 50%.

Objection J:

In relation to housing mix, replace with 'is a requirement' and back up with standards. (Stanthorpe Triangle Residents Association)

Response J:

Not accepted – the Council considers that “will be required” has the same effect as “is a requirement” and that change is therefore unnecessary. Lambeth will be reviewing its Supplementary Planning Guidance following adoption of the plan and housing mix may be included in that review.

Objection K:

Could prevent the sale of existing properties to improve affordable housing elsewhere (Metropolitan Housing Trust)

Response K:

Whilst the Council recognizes that the Policy could operate in this way, such cases would be rare. Where such cases arise, it would be open for the Council to treat an application as a departure from the plan and make an exception to the Policy. Policies should not refer to exceptional circumstances where policies will not apply, nor can they cover all possible development circumstances.

Objection L:

We would like the UDP to provide standards capping the number of short-term residential units (HMOs and Hostels) which can be developed within a specified residential area (Steve Wiltshire/ Hazel Fraser, K Beegan, Mr W.L.Lord, Carla Lerman)

Response L:

Not accepted - this subject is appropriately covered under Policy 18 and meets the concerns of the objection.

Objection M:

Revise the figure In (A) for additional housing to reflect the London Plan (Fairclough Homes, Fairview Homes)

Response M:

The additional housing figures set out in Policy 15 accord with the housing targets set out in the Draft London Plan, albeit that they are expressed over a different time period.

Objection N:

The Council should clarify its approach to monitoring and give a commitment in policy terms to constant and robust monitoring with the results of that monitoring, and any consequential adjustments in housing provision levels, published at regular intervals (Fairclough Homes, Fairview Homes)

Response N:

Accepted – change made (see Para A, ii)

Objection O

The policy (para C) should state: ". a mix ..will be sought,..” and the word 'affordability' should be deleted. The policy should seek a mix pan-Borough rather than on each site. (Fairclough Homes, Fairview Homes, CLS Holdings PLC)

Response O

Not accepted – ‘will be sought’ is weaker than government policy in PPG3, which requires a mix. The Government Office for London has objected to similar policy wordings, which exclude a reference to “affordability” as this is this contrary to PPG3. Seeking a mix across an area would be contrary to PPG3, which seeks to ensure that developments are themselves mixed and contribute to the mix of the surrounding area.

Objection P:

The threshold should be higher than 10 units, this is contrary to government policy on affordable housing and pre-empts decisions about affordable housing in London. (Peabody Trust, Fairview, Fairclough, Laing, Goldcrest, Metropolis, Allsop Verill, Clapham Park Developments Limited, Weald Properties, Thistle Developments, CLS Holdings PLC)

Response P:

Not accepted. Policy 15 relates to all housing types and the Council considers that it is appropriate to seek to secure a mix of dwelling types on all sites over 10

dwellings. This accords with PPG3 that requires the creation of mixed communities that offer a choice of housing whilst avoiding large areas of housing of similar characteristics.

Objection Q:

The threshold should be reduced to 5+units for conversions (Stanthorpe Triangle Residents Association)

Response Q:

Not accepted. Policy 17(C) requires a mix of dwelling types in all flat conversions so a change is not necessary.

Objection R:

The housing mix promoted should not be unreasonably restrictive, and should allow for the consideration of particular site characteristics and circumstances. (Level Properties, Eaton Square Garages Limited)

Response R:

Noted – the policy already allows for this.

Objection S:

Suggest in response to Policy 6, couldn't Policy 15B be expressed more forcefully, as a presumption in favour. (Bryant Developments)

Response S:

Not accepted – revised PPG3 has removed such a 'presumption in favour'. The government will object to such presumptions except in a very limited range of circumstances.

Objection T:

Figures are unrealistic and need to be co-ordinated with neighbouring Boroughs (J Clyne, Bernard Gentry)

Response T:

Not accepted – at a recent planning appeal the figures were considered realistic and achievable. They have also been co-ordinated with neighbouring Boroughs through the London Housing Capacity Study.

Objection U:

Figures for Clapham Park are too high (Darren Saunders, Clapham, Park NDC)

Response U:

Accepted – the appropriate figures have been reduced in line with current master planning expectations. (See proposed change to table 7)

Objection V:

HMOs should not be treated as affordable housing as they are generally poorly maintained, offer poor facilities and provide non-secure, short-term tenancies, to temporary residents. (Carla Lerman, K Beegan, Steve Wiltshire/ Hazel Fraser)

Response V:

Not accepted – the key consideration is that the unit is available in perpetuity as affordable housing even if the leases are temporary. HMOs – now referred to as properties in multiple paying occupation (PMPOs) - are an important source of affordable housing, which needs to be regulated and protected, where possible. Policy 18 specifically covers the issue of quality of units. Government policy in PPG3 allows boroughs to protect them as affordable units and Lambeth has won appeals on this issue.

Objection W:

Existing HMOs and hostels may not be affordable in that they may not meet the Council's affordable housing definition. Secondly, where an RSL historically owns an HMO or hostel and the RSL wishes to convert or develop to provide larger affordable units to meet a need identified in the Housing Strategy Statement. This exception should be allowed by the policy (Metropolitan Housing Trust)

Response W:

Not accepted – as Para 4.10.12 recognizes that in hostels, rent levels may be higher, so this is already taken into account. In addition, policy 15 (D) allows loss of one form of affordable housing to another. An amendment is proposed to clarify this.

Objection X:

Opposed to removal of density standards. (Bernard Gentry)

Response X:

Not accepted - density issues are covered in Policy 32.

Objection Y:

Policy should have regard to market characteristics, site development costs and planning gain. (Metropolis)

Response Y:

Not accepted – this is a matter considered in every policy and it is not necessary to mention it in each one.

Objection Z:

The London Housing Capacity Study contains too high a figure for non-self contained permanent accommodation and too low a figure for windfalls (Metropolis)

Response Z:

Accepted – the plan contains revised figures for both of these categories.

Objection AA:

Delete 'this is the only means of securing essential improvements to the quality of affordable housing remaining/ rebuilt on site... and the property is incapable of being brought up to Housing Act standards without this' (Vauxhall Neighbourhood Housing Forum)

Response AA:

Not accepted – this would lead to considerable objections from registered social landlords who occasionally have to do this to improve social housing e.g. partial redevelopment of short-life housing which has high refurbishment costs. In 'Project Vauxhall', it clearly was not the only way. They could have developed to a higher density and on the basis the Mayor of London rightly objected to the scheme.

Objection BB:

Should state that: 'as an exception to (C), developments providing Key Worker accommodation will be considered favorably.' (Peabody Unite)

Response BB:

Not accepted – as key workers have a need for a mix of dwelling sizes and type as much as any other group.

Objection CC:

The essence of 4.10.10 should be included in the policy (Peabody Unite)

Response CC:

Not accepted - this paragraph provides more lengthy explanation of clause (D) and is appropriately included within the supporting text to the Policy.

Objection DD:

Policy should have an additional clause promoting key worker housing (Peabody Unite)

Response DD:

Not accepted - this matter is appropriately covered by Policy 16.

Objection EE:

Para (C) should be strengthened to require a mix of family and couple units (Streatham Partnership Board)

Response EE:

Not accepted - the policy already requires a mix of larger and smaller dwellings as appropriate.

Objection FF:

The UDP should provide some indication of the term "a suitable residential environment" (para B) (Streatham Partnership Board)

Response FF:

Not accepted - this will be assessed against the other policies of the plan, i.e. noise etc.

Objection GG

The Council should note that achievement of the target is dependent on the major estate regeneration sites identified coming to fruition. The plan should state that if these are not deliverable, the Council will not abandon its environmental and amenity standards in order to deliver compensating additional units through increased densities for residential conversions and small windfall sites (Streatham Partnership Board)

Response GG:

Accepted - amendment proposed which meets the objection.

Objection HH:

Amend wording of policy to refer to affordable housing being provided in accordance with needs as indicated by housing needs survey (Chelsfield, CLS Holdings PLC)

Response HH

Not accepted – this matter is covered by Policy 16.

Objection II

SPG should be flexible would like to see it (CLS Holdings PLC)

Response II

Not duly made as refers to SPG not plan. Lambeth has dropped all of its 'standards' SPG in the light of PPG3 (other than room size standards), and has replaced them with Urban Design Guidance SPG as stated in the plan (The Urban Design Compendium)

Objection JJ:

This should be more forcefully worded, i.e. "residential development should only be allowed if..." (Sally Wadsworth)

Response JJ:

Not accepted – good practice guidance as endorsed by the Government states that policies should usually be positively worded.

Objection KK:

Cross-reference to policies on securing community facilities (Sally Wadsworth)

Response KK:

Not accepted – this is covered by Policy 26 and good practice guidance as endorsed by the Government states that cross-references should be kept to a minimum.

Objection LL:

There should be a greater emphasis on re-using disused industrial buildings (Ridale Properties)

Response LL:

Not accepted – the plan allows the re-use of buildings for which there is no demand for a "protected use" to be used for housing. This matter is dealt with in detail in responses to policies 22 & 23.

Summary of representations and Responses (paras) :

Objection A

Inference is given that all sheltered housing schemes and HMOs will be affordable. It needs to be clarified that this is not the case, and the definition in paragraph 4.10.11 will prevail. (Rose Sandell, Lambeth Housing Association Liaison Group)

Response B

Accepted - change made.

Policy 16 Affordable Housing

Summary of Representations and Responses;

Objection A:

Circular 6/98 advises that there should be indicative targets for individual sites. A more explicit link between the 50% and the Housing Provision Survey would be helpful (Government Office for London Informal Comment)

Response A:

Many, indeed the large majority, of houses on sites in Lambeth will be on mixed-use sites. It is impossible to predict what exact proportion there would be in advance of housing. Indeed in a design-led approach to density it is difficult to predict at a site level the scale of housing. Hence it would be unwise on a site level to set targets. The Lambeth Housing Provision study does include estimates but solely to produce a global estimate of housing and the amount of affordable housing. Lambeth has reviewed this in the light of a viability assessment, related to the housing provision study, undertaken by Chris Marsh. As a result revisions to the affordable housing requirement have been proposed. The link between the affordable housing requirement and the housing provision and viability studies is made explicit in supporting text.

Objection B:

Capping social housing grant may be unreasonable and may render schemes uneconomic (Government Office for London Informal Comment)

Response B:

The use of planning obligations to cap or preclude social housing grant has been found to be lawful in the Tower Hamlets case as set down in the plan. It is now quite common. The independent viability study has set down levels of cap that would maintain schemes being economic and this is reflected in the revised approach.

Objection C:

Delete 'and' in policy 16 c and replace with 'or' (Mayor of London)

Response C:

Accept - change proposed.

Objection D:

In 16(e) The 100 percent provision is supported in policy terms where uses that are normally protected are lost. However, this approach could result in single use and single tenure developments and could in particular contexts be contrary to the promotion of both mixed uses and mixed and balanced communities, hence delete 'on all sites regardless of size' (Mayor of London)

Response D:

Whilst accepting the concern about mixed and balanced communities, the phrase 'regardless of size' is necessary to highlight that this applies to sites below the normal affordable housing site size thresholds – as for rural 'exceptions' sites. Following discussions with the Mayor's office a change is proposed which should satisfy this objection.

Objection E:

Paragraph (F) should make clear that Key Worker Housing is just one aspect of intermediate housing (Mayor of London)

Response E:

Accepted – change proposed.

Objection F:

The definition of Affordable Housing in the supporting text should be much more detailed and concise. The definition of Key Worker accommodation should be set out under a separate heading (Peabody Unite)

Response F:

Not accepted – the Council notes that Government guidance encourages local authorities to define “affordable housing” in their development plan. Nevertheless, the Council has re-examined the definition and has made appropriate changes.

Objection G:

Unclear as to how paragraph (F) relates to normal intermediate expected provision. Is it proposed that 15% of housing on a qualifying site will be expected to be for key worker satisfying paragraph (F), a further 15% for other intermediate housing and 35% for people on low incomes?

Response G:

Part (C) of the policy requires, typically, 70% of the affordable units to be provided for people on low incomes who cannot afford market housing, and 30% as intermediate housing. Key worker housing, where it is provided, will form part of the 30% intermediate housing, it is not an additional requirement. Part (F) seeks to influence proposals where more than 15% of the affordable units (ie half of the 30% intermediate housing element) is being proposed as key worker housing.

Objection H:

Raises clear questions about the viability of schemes especially on the smaller sites (Government Office for London Informal Comment)

Response H:

Not accepted – It is important to maintain flexibility as the report by Lambeth’s independent valuation consultant shows that not all sites can take 50% provision. While there is a new Three Dragons model to evaluate individual schemes, Lambeth employs its own independent valuation consultant.

Objection I:

We would like to add a provision for prioritising housing for those already living in the area or with strong local links (e.g. working permanently in the area, or with family living locally), and prioritising housing for young people. (Brixton Area Forum Board)

Response I:

Not accepted – in an urban context prioritising locals could be indirectly discriminatory. Under the Housing Acts (*See footnote 4, page 51 of the Deposit Draft UDP*) Lambeth must give priority to those with ‘priority need’, e.g. families with children. Lambeth supports housing for younger people, but under its statutory obligations this cannot be at the expense of those in priority need. The policy supports housing for the full range of housing need and the specific housing needs of individual groups is best dealt with in the more detailed annual housing strategy.

Objection J:

The policy should be amended to read: "The normal expected level of provision will be 50% of habitable rooms. Any provision below this level should not be permitted without reference to the GLA/Three Dragons model". (Brixton Area Forum Board)

Response J:

Not accepted - the policy makes it clear less than 50% of habitable rooms will only be acceptable where it can be demonstrated that the scheme would be financially unviable. The reference to the use of the Three Dragons Report in assessing schemes is appropriately included in the supporting text to the policy. It would be inappropriate to refer to the report in the text of the Policy itself.

Objection K:

Objection to this policy because it implies that, despite the exceptions, affordable housing is always preferable to the other small-scale uses which are of value to the ethos of a mixed-use community (e.g. small local workshops, studios etc) (Jeremy Hammerton and John Adams of the Clapham Society)

Response K:

Not accepted – Policy 16 relates only to the provision of affordable housing, reflecting its prioritisation by the Council. Other policies in the plan encourage mixed-use schemes including the uses referred to by the objector. Such uses are not precluded by the inclusion of affordable housing in schemes.

Objection L:

The 50% and/or 10-unit threshold figures are unrealistic, will prevent sites from coming forward for redevelopment, are excessive, and are contrary to Government requirements, as contained in Circular 6/98 and PPG15. (Hays Plc, Richard Coburn of Railtrack, Giles Atkinson of the House Builders Federation, Groveville Ltd, Laing Homes, R G Pickett of the Diocese of Southwark, Kevin Scott of Bellway Homes South East, Allied Dunbar Assurance c/o Threadneedle Property Investments Ltd, Fairclough Homes Ltd, Fair View Homes Ltd, Level Properties Ltd, Terry Fuller of Bryant Developments, London Electricity, Peabody Trust, Mark Brown, Workplace Group Plc, Clapham Park Developments Ltd, Weald Properties Ltd, Goldcrest, Chelsfield Plc, CLS Holdings Plc, BT Group Plc, Mount Anvil Construction, Rialto Homes Plc, Thistle Developments, Eaton Square Garages Ltd, B Sweby of Castlebank Properties, St George South London, Metropolis, Alsop Verill, Ridale Developments Ltd, J Sainsbury's Plc)

Response L:

Not accepted. The site size threshold and 50% habitable rooms target, whilst partially out of step with Circular 6/98, is justified in the by the local context of the outstanding need for affordable housing. Unless these targets are adopted, the Council will not meet its target for affordable housing which itself is an underestimate of actual need. The Council refers to expert evidence indicating that residential sites in Lambeth can support 50% affordable housing. A significant majority of housing will come from large identified sites where guidance indicates it is appropriate to refer to a % requirement for affordable housing.

Objection M:

Whilst the Circular makes provision for local planning authorities to adopt a lower threshold, where exceptional local constraints can be demonstrated. Having regard to the text of the Circular, this clearly only relates to local planning authorities where the higher threshold of twenty five or more dwellings or residential sites of 1 hectare or more applies, i.e. sites outside inner London. Within inner London the lower threshold referred to in the policy already applies (Thistle Developments)

Response M:

Not accepted. Whilst the Council accepts that the Policy is out of step with Circular 6/98 in relation to the site size threshold. However, this is justified by the constrained local circumstances relating to the supply of affordable housing and continued unmet need.

Objection N:

We consider a figure of 30% affordable housing would be more realistic and request that this be reflected in Second Deposit Plan (Hays Plc, Allied Dunbar Assurance c/o Threadneedle Property Investments Ltd, Workplace Group Plc)

Response N:

Not accepted - the Council considers that the 50% habitable rooms target is justified in the context of the constrained circumstances of the supply of affordable housing and continued unmet need. If a 30% figure were adopted, the Council would underachieve to an unacceptable degree in relation to the target for affordable dwellings set out in the UDP.

Objection O:

Lambeth's Housing Needs survey was produced in January 1998 we consider that this is out of date (Hays Plc, Fairclough Homes Ltd, Fair View Homes Ltd, London Electricity)

Response O:

Not accepted - the DETR recommends that assessments of housing need should be undertaken "once every five to seven years" (Local Housing Needs Assessment: A Guide to Good Practice - DETR 2000). Notwithstanding this, Lambeth has subsequently published the Lambeth Housing Needs Survey 2003.

Objection P:

Further clarification is required in respect of when the 50% figure will be relaxed. The viability of public transport, development proposals may be undermined and improvements to public

transport forgone if significant additional contributions are required for other community benefits (Richard Coburn of Railtrack)

Response P:

Not accepted. Securing affordable housing is a priority for the Council. Nevertheless, it is a priority, which needs to be balanced with competing objectives in the plan. Notwithstanding this, the Council does not consider it is appropriate to introduce into Policy 16 exceptions where the 50% target will not be sought, other than where the economics of provision justify this. However, it remains in the Council's power to apply the policy flexibly where circumstances justify such an approach, for example where community and other benefits are sought.

Objection Q:

Policy needs to specify the type of circumstances it would define as 'exceptional,' is where private residential would be acceptable over affordable housing (Michael Ball of Vauxhall Neighbourhood Housing Forum)

Response Q:

Not accepted. To list some possible "exceptional" circumstances where no affordable housing would be required in relation to a private residential scheme would undermine the effectiveness of the Policy. Exceptional circumstances are by their nature, impossible to define in advance.

Objection R:

The Agency wish to object to the omission of not using 'provision-in-lieu' payments to be used to bring empty property back into use (Susan Heinrich of Empty Homes Agency)

Response R:

Not accepted – but change proposed. 'Provision-in-lieu' means exactly that – the development of affordable housing in an alternative location where this is justified by exceptional circumstances. Legal opinion indicates that monies secured for the provision of affordable housing in-lieu can only be used to bring vacant dwellings back into use where those dwellings have been vacant for 10 years or more. This proviso will be added to the supporting text to the policy.

Objection S:

It is unreasonable of the Council to base its policy, in this important area on the Three Dragons report. Which has not been tested, nor implemented by the Mayor. (Giles Atkinson of House Builders Federation, Groveville Ltd, Fairclough Homes Ltd, Fair View Homes Ltd, Terry Fuller of Bryant Developments, London Electricity, Clapham Park Developments Ltd, Weald Properties Ltd)

Response S:

Not accepted. Whilst the Council refers to the Three Dragons Report, it has also commissioned an independent report into the financial viability of the proposed policy. That study indicates Lambeth is a location which can support a level of 50 % habitable rooms as affordable housing.

Objection T:

There is a contradiction between the Council's formula for calculating the off-site payment in lieu and part G of the policy, which promotes 'additionality.' The formula demands an off-site contribution equivalent to 130% SHG from a developer yet the additionality policy ultimately requires the developer to build housing without any public subsidy (Giles Atkinson of House Builders Federation, Terry Fuller of Bryant Developments, St George South London)

Response T:

The Council has deleted clause (G) of the policy which referred to the concept of additionality.

Objection U:

Objection to the policy's reference to the concept of additionality whereby provision of affordable housing through the policy should be additional to housing provided through public subsidy. This part of the policy should be deleted (Laing Homes, Kevin Scott of Bellway Homes South East, Fairclough Homes Ltd, Fair View Homes Ltd, Peabody Trust, St George South London, Metropolis)

Response U:

Agreed – clause (G) dealing with additionality has been deleted from the Policy.

Objection V:

Part (E) there is no basis in planning law or practice for the former use of land to determine what future use shall be. Either the current use is worth protecting as such, in which case it should be protected by appropriate policy, or it is no longer required in its current use, in which case it should be developed for another use. It is unreasonable for the Council to seek leverage for provision of affordable housing by the partial down-grading of the planning status of existing other uses (Giles Atkinson of House Builders Federation, Terry Fuller of Bryant Developments)

Response V:

The Council's approach in seeking to facilitate 100% affordable housing proposals is justified. Whilst sites in specified number of uses will be protected from changes of use (KIBAs, pubs, town centre core units), an exception to this approach will be made where the scheme is solely for affordable housing. This reflects the Council's prioritisation of the need to provide affordable housing, and the recognition of the inability of Registered Social Landlords to compete for land in the market.

Objection W:

Considered that affordable housing might be an appropriate planning gain to be sought from certain wholly residential or mixed-use developments within KIBAs (Metropolis)

Response W:

Not accepted. The policy appropriately seeks to preserve the existing supply of employment land by preventing land included in KIBAs being development for other uses. However, the policy does allow for the possibility of the provision of affordable housing in KIBAs identified for mixed-use employment, partly meeting the concerns of the objector.

Objection X:

Part (G) Additionality is unlawful in that it seeks through policy, to determine the price at which developers must sell their land and or buildings at an undervalue (Giles Atkinson of House Builders Federation, Goldcrest)

Response X:

Whilst the Council does not accept this argument, clause (G) dealing with additionality has been deleted.

Objection Y:

The high proportion of affordable housing sought because of the crime and other social problems that are associated with it, particularly if it is put in concentrated areas. Improvement of community facilities, open space and quality of life for existing communities approved as a priority ahead of affordable housing, and more than 50% of any housing should be for key workers (Diane Miller, Sally Wadsworth)

Response Y:

Not accepted. The Council does not accept the link the objector makes between "crime and other social problems" and the provision of affordable housing. The Council aims to secure mixed private/affordable housing schemes in accordance with Government guidance. Unless the target of 50% is included in the plan, the Council stands little chance of meeting its affordable housing target, which is an underestimate compared with the extent of unmet need. Achieving affordable housing is compatible with achieving the other benefits set out by the objector (community facilities, open space)? Where decisions have to be made on which planning benefits are secured in the context of limited resources, the need for affordable housing will need to be balanced with other objectives.

Objection Z:

Lambeth already has an enormous proportion of public and social housing, and a large number of empty public and social housing properties – 50% should be reduced to 20% (Mark Rogers and Chloe Thomas)

Response Z:

Not accepted. The Council's objective of seeking to meet some of the need for affordable housing is appropriate in the context of securing a successful local economy, and well-balanced communities. Whilst the extent of vacancy in the "social housing sector" is low in comparison with other Boroughs, a reduction in "empties" also forms an important component of the Council's overall Housing Strategy.

Objection AA:

Any threshold creates anomalies and consideration needs to be given to a sliding scale of provision to avoid the artificial suppression of development below a threshold because of the excessive opportunity cost created when just crossing the threshold (Groveville Ltd, Clapham Park Developments Ltd, Weald Properties Ltd)

Response AA:

Not accepted. The Council considers that the site size threshold proposed is appropriate and fully justified. Unless sites over the size specified in the Policy included within the scope of the Policy, the Council will not meet its target for affordable housing.

Objection BB:

The basis for assessing proportions of affordable housing should more appropriately be on a unit-by-unit basis and not using habitable rooms (Groveville Ltd, Clapham Park Developments Ltd, and Weald Properties Ltd)

Response BB:

Not accepted. The Council's reference to habitable rooms rather than dwellings introduces flexibility to the policy to reflect the specific need for affordable housing on a site by site basis. On one hand, a development of larger units would place an onerous requirement on the developer. On the other, reference to habitable rooms can reduce the % of affordable housing required on a site to be reduced to 40%. The use of habitable rooms as a measure has also been supported by an inspector at a recent major appeal in the Borough.

Objection CC:

The criteria contained in Sections C, D, E, F and G are too prescriptive and do not allow the merits of proposals to be assessed on an individual basis (Groveville Ltd, Kevin Scott of Bellway Homes South East, Clapham Park Developments Ltd, Weald Properties Ltd)

Response CC:

Not accepted. Criteria C and F are necessary for the Council to achieve mixed but balanced communities without a predominance of one form of housing. Criterion D reflects the guidance in Circular 6/98 requiring on site provision of affordable housing. Criterion E reflects the priority attached to affordable housing/community uses which may justify the loss of otherwise protected land uses. The Council has deleted clause (G) of the policy which referred to the concept of additionality.

Objection DD:

Welcome the 'exceptions' approach in paragraph E, but the list of inappropriate categories is too wide. Pubs and modern units, for example, should be available for 'exceptional' affordable housing (Rose Sandell of LAMHAG, St George South London)

Response DD:

Not accepted. Pubs and recently developed employment units are appropriately protected by criteria E of the policy, reflecting the desirability of preserving these uses to create and maintain vital and viable communities.

Objection EE:

Object to the possible inclusion of an element of general market housing, unless it is made clear that the affordable housing element would be in excess of (i.e. more than 50%) the normal expected provision (Rose Sandell of LAMHAG)

Response EE:

Not accepted. The proposed change is considered to be unnecessary. The % of affordable housing required on qualifying sites is covered by Criterion (A.)

Notwithstanding the exceptions in respect of otherwise protected uses set out in Criteria E.

Objection FF:

There is a typographical error in line 2 of (E): 'is to be developed solely for' (Rose Sandell of LAMHAG)

Response FF:

Accepted. To be redrafted to; "provided that it is to be developed solely for affordable housing"

Objection GG:

Object to the omission of supported / special needs housing provision as an element of affordable housing. The exclusion of supported / special needs housing would have the affect of lessening the viability of provision for such groups and would exclude the provision for their affordable housing needs (Graham Mills of NHS Executive London Regional Office)

Response GG:

Not accepted. Policy 16 is intended to secure "general" affordable housing (comprising "social" and "intermediate" housing) and to this extent supported housing has not been "omitted". To require developers to provide affordable supported housing in addition to general affordable housing would be too onerous. Policy 15 requires developments over a certain size to provide a mix of dwelling types and affordability to meet the changing composition of households in need. This could include supported housing if there was a demand.

Objection HH:

The restrictive wording of the policies around key worker accommodation should be amended to make it easier for larger sole purpose key worker accommodation proposals to be considered, as opposed to a small percentage of larger mixed developments. (Simon Wood of Kings College Hospital NHS Trust, Peabody Unite, Robert Doyle of the Streatham Society)

Response HH:

Not accepted. The 30/70 % "social-intermediate" split in the policy reflects assessed need/demand for these forms of housing and the wish to create balanced communities. The policy cites this split as "typical" which correctly implies a degree of flexibility. Should proposals come forward for sole-purpose key worker housing, this could be treated as an exception to the policy.

Objection II:

Affordable housing should be built as needed by the Council and integrated in all areas right across the Borough, rather than relying on developers (or arbitrary percentages) to provide for the housing needs of essential parts of the working population i.e. key workers (Barbara Pattinson of the Camberwell Society)

Response II:

Not accepted. Government guidance (PPG3,6/98) indicates that the main source of affordable housing (of which key workers form a part) will be that negotiated in relation to market housing schemes. To this extent, the Council is largely reliant on private housing development. Unfortunately, financial restrictions mean the Council cannot provide affordable housing on its own, however desirable this might be. The percentage of affordable housing required by the policy is not arbitrary but reflects an assessment of the need for affordable housing, potential supply and the economics of provision.

Objection JJ:

The key worker housing test (iii) that there should be a need for employees to live close to their place of work (e.g. shift work) is irrelevant, as irrespective of this point, there is a need for this type of accommodation (Peabody Unite)

Response JJ:

Not accepted. The Council's rationale is that the limited amount of key worker housing that is expected to be achieved in the Borough justifies its "rationing" to service the Borough's own need for key workers. An example is nurses and other public sector shift workers who are reliant on public transport at unsociable hours. The Council does not consider it appropriate to allow the limited numbers of key

worker dwellings likely to come forward to meet the demand for such accommodation from other, potentially distant, non-shift based work locations.

Objection KK:

There appears to be no definition of the term 'key worker' within the Plan. We would suggest that it includes those working in the hospitality industry and especially in visitor accommodation (Mark Balaam of the London Tourist Board and Convention Bureau)

Response KK:

Not accepted. Criterion F (i) defines "key workers" for the purposes of the policy, limiting it to "named employees of key public services...". This excludes those working in the hospitality industry (as proposed by the objector). The Council's definition arises from its prioritisation of those requiring key worker housing (for example nurses working in the Borough's hospitals) and its acknowledgement of the need to "ration" its supply.

Objection LL:

Their needs to be a condition applied, that seeks to refuse / limit future residential development of neighbouring sites where circumvention of this policy is considered a possibility. (John How of Clapham and Stockwell Town Centre Board)

Response LL:

Not accepted. Criterion (A) of the policy states the Council's intention to prevent the artificial subdivision of sites to circumvent this policy. The Council has no powers to include conditions on planning permissions to control development on adjacent sites in the way suggested by the objector.

Objection MM:

Policy should be reworded to say 'social housing' i.e. provision included that specifies/prioritises housing for young people, housing for those already living in the area or with strong links, e.g. family links (S Campbell)

Response MM:

Not accepted. The Council's definition of affordable housing accords with current best practice and Government guidance and is wider than the traditional reference to "social housing". The Council's definition does not refer to the age of potential occupiers, whether they live locally or have local connections, as there would be no justification for this. To limit occupation to those already living locally or with local connections could also be indirectly discriminatory.

Under the Housing Acts (*See footnote 4, page 51 of the Deposit Draft UDP*) Lambeth must give priority to those with 'priority need', e.g. families with children. Lambeth supports housing for younger people, but under its statutory obligations this cannot be at the expense of those in priority need. The policy supports housing for the full range of housing need and the specific housing needs of individual groups is best dealt with in the more detailed annual housing strategy.

Objection NN:

Allegation of artificial sub-division; it is unrealistic to refuse applications solely on the basis of a site being subdivided. (London Electricity)

Response NN:

Not accepted. The Council's approach to the artificial sub-division of sites, in this circumstance is appropriate and realistic. The Council considers that a sanction is necessary to prevent developers/landowners from deliberately sub-dividing sites to avoid the requirement for affordable housing.

Objection OO:

Object to the overly prescriptive division between 70% of the affordable units for people on low incomes who cannot afford market housing and 30% as intermediate housing for people on moderate incomes to buy or rent – should be more flexible (London Electricity, Rialto Homes Plc, St George South London)

Response OO:

Not accepted. The 70/30 % "social-intermediate" split in the policy reflects the assessed need/demand for these forms of housing and the desire to create balanced

communities. The policy cites this split as “typical” which correctly implies a degree of flexibility. Proposals diverge markedly from this split where justified, could be supported as an exception to the policy.

Objection PP:

Object to requirement that affordable housing is to be distributed through different parts of a site on the basis that there will be circumstances where this is neither appropriate nor feasible, and should be the subject of the normal negotiation process (London Electricity, St George South London)

Response PP:

Not accepted. The requirement for affordable housing to be distributed (or pepper-potted) through the site reflects Government guidance (PPG3, Circ 6/98). The Council is committed to the creation of mixed, balanced communities and the avoidance of developments dominated by single house types (i.e., all private/all affordable). The Council considers that as a matter of policy, it is appropriate and justified to include the requirement to distribute affordable housing amongst market housing. It is difficult to envisage a situation where it would be inappropriate or unfeasible to pepper-pot affordable housing amongst the market housing it has been provided in relation to.

Objection QQ:

Object to the requirement that affordable housing should be available for occupation at the same time or sooner as other elements as this should be subject to normal negotiation process (St George South London)

Response QQ:

Not accepted. The requirement for affordable housing to be distributed (or pepper-potted) through the site reflects Government guidance (PPG3, Circular 6/98). The Council is committed to the creation of mixed, balanced communities and the avoidance of developments dominated by single house types (i.e., all private/all affordable). The Council considers that as a matter of policy, it is appropriate and justified to include the requirement to distribute affordable housing amongst market housing. It is difficult to envisage a situation where it would be inappropriate or unfeasible to pepper-pot affordable housing amongst the market housing it has been provided in relation to.

Objection RR:

The implication that current employment sites outside KIBA’s could only be redeveloped for either totally affordable housing or for employment purposes, but not for private housing, should not be presented to override site specific policy proposals such as those presented in the chapter entitled ‘Area and Site Policies’ – rewording required. (London Electricity)

Response RR:

Not accepted. The need to provide affordable housing in the Borough and the limited opportunities to meet the need justifies the Council’s approach. In the rare circumstances where proposals for 100% housing schemes are proposed, the Council wishes to maximise the opportunity to facilitate such schemes. This partly reflects the Council’s recognition of the inability of Registered Social Landlords to compete successfully for land in the market place.

Objection SS:

Policy should require the identification of a site where the S106 money will be used to provide affordable housing, and require the achievement of permission for that site prior to permission being granted on the original site (Michael Ball of the Vauxhall Neighbourhood Housing Forum).

Response SS:

Not accepted. The Council considers this to be unnecessary for the following reasons; the Council will normally require on-site provision; where off-site provision is acceptable, a site will normally have been identified; the suggested approach could ultimately frustrate the supply of affordable housing.

Objection TT:

Object to the policy requirement that every development should provide significant planning obligations at the same time as providing residential units with a 50% affordable housing element – too onerous (Alsop Verill)

Response TT:

Not accepted. The Council's objective of seeking affordable housing and other planning benefits through S106 agreements reflects the complementary, sometimes competing objectives of the plan. The planning benefits required in relation to particular proposals will be negotiated on a case-by-case basis and whilst affordable housing will normally be the priority. Other community benefits might also be sought. In all cases, the economic viability of proposals and the cost associated benefits will be assessed, and the Council's requirements will be informed by this assessment.

Summary of Representations and Responses (para 4.10.15)

Objection A

Para 4.10.15 - Cash in-lieu payments. Before acceptance - policy and/or protocol should specify how, when and on what the money should be spent; including consultation with the wider community. (S. Campbell, Brixton Area Forum Board)

Response A

See changes proposed to 4.10.16

Objection B

Para 4.10.15 - We object to giving developers the opportunity to use 'cash in lieu' as a justification to set high service charges as an alternative to housing. (Brixton Area Forum Board)

Response B

This is occasionally a problem, however Lambeth's first response is to seek that developers subsidise the service charges and a proposed amendment makes this clear.

Objection C

Para 4.10.15, and any other references to Cash-In-Lieu payments. We would like an inclusion in the policy that specifies that, in the case of a Cash-in-Lieu payment being accepted, that this must be spent, within a reasonable amount of time, on a very local scheme benefiting the surrounding community, developed in consultation with that community to determine their needs. Information about the amount and destination of the money spent must be in the public domain. (Brixton Area Forum Board)

Response C

Accepted in part – additions are proposed to this paragraph. However it is still important to maintain flexibility to ensure that schemes are delivered, most recently this has led to extra housing investment in Brixton.

