

**Lambeth Replacement Unitary Development Plan  
Modifications Document Three**

**Inspector's recommendations which have not been  
accepted in whole or in part, and/or policies,  
paragraphs and MDOs where additional Council  
changes are proposed  
October 2006**

## **Lambeth Replacement Unitary Development Plan**

# **Inspector's recommendations which have not been accepted in whole or in part, and/or policies, paragraphs and MDOs where additional Council changes are proposed - October 2006**

## **Modifications Document 3**

### **What this document shows**

Details of all sections of the UDP where either:

- An Inspector's recommendation was not accepted in whole or in part
- An additional change is proposed by Council

### **The Council has also produced three other documents:**

- Response to Inspector's Recommendation – Modifications Document 1
- Proposed Modifications to the Lambeth Revised Deposit Unitary Development Plan – Modifications Document 2
- Proposed Modifications to Maps, Diagrams and Tables – Modifications Document 4

### **Changes to maps diagrams and tables, including the Proposals Map**

Where it was not possible to include changes to the UDP's tables, diagrams and maps within this document due to insufficient space, readers will be referred to Modifications Document 4 – Proposed Modifications to Maps, Diagrams and Tables.

### **Modification Numbers**

These provide a cross-reference between the different appendices.

MOD-T/ references are changes to UDP text, tables or maps (not including changes to the Proposals Map)

MOD-PM/ references are changes to the Proposals Map

**Inspector's recommendations which have not been accepted in whole or in part,  
and/or policies, paragraphs and MDOs where additional Council changes are proposed**

**Replacement Lambeth Unitary Development Plan, September 2006**

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's recc. or Council change	Reason for Response / Action	Modification Number
<b>Part 2</b>				
<b>Core Policies (Section A)</b>				
Paras 4. & 4.1	<p><b>4. Part II Core-Policies (Section A)</b></p> <p><b>4.1. Using Part II the Core-Policies</b></p> <p>4.1.1. This chapter contains the <del>Part II core-policies</del> of the plan. The aim of these is to provide a comprehensive and short list of policies that can be used as a basis for <u>deciding planning applications</u> <del>assessing the impact of the objectives of the plan of any planning application.</del></p>	Change initiated by Council	There is a need to clarify the terminology used in this section. Core policies are associated with the new system of development plans introduced by the Planning and Compulsory Purchase Act 2004, whereas this is a UDP under the former development plan system of the 1990 Act under which such terminology does not apply. Clarification has also been added about the purpose of Part II policies.	MOD-T/14
Policy 4 (& Para 4.6.4,)	<p>I recommend that the RDUDP be modified by:</p> <p>D) Adding at the end of paragraph 4.6.4 the following:</p> <p>"...need to be complementary. <b>The Council, in partnership with the Mayor and other relevant stakeholders, will review retailing and town centre policy within the context of Sub Regional Development Frameworks at the earliest opportunity.</b>" (FC8)</p>	Inspector's recommendation partly accepted	<b>Reason:</b> The Council agrees that reviewing town centre policy and performance is an important part of monitoring the UDP. However since the Inspector's Report was received, the final Central London Sub Regional Development Framework document has been published. This does not provide for any significant changes to Lambeth town centres' role or size within the overall hierarchy. Therefore there is no need to review the UDP's town	MOD-T/22

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			<p>centre policy at the earliest possible opportunity. This can be dealt with as part of the normal ongoing monitoring of the UDP.</p> <p><b>Action:</b> At the end of paragraph 4.6.4, add the following text - <b><u>'The Council will monitor this position and review opportunities for future development.'</u></b></p>	
Policy 8	<p>I recommend that Policy 8 of the RDUDP be modified as follows:</p> <p>A) Amend the first sentence of part (b) of the policy to read:</p> <p><b>"for development which attracts a lot of people, the capacity of the public transport network, with in convenient and safe...."</b> And</p> <p>Amend the final sentence of part (b) to read:</p> <p>"This will include securing and providing additional facilities for bus <b>and/or railway</b> operations where they are necessary in order to meet increased level of demand;"</p>	Inspector's recommendation accepted but additional change proposed	<p>For the reasons set out in the Inspector's report, but with the additional reference to trams for clarification.</p> <p><b>Action:</b> Amend the final sentence of part (b) to read:</p> <p>"This will include securing and providing additional facilities for bus <b>and/or railway/tram</b> operations where they are necessary in order to meet increased level of demand;"</p>	MOD-T/30
Policy 16 (and Para 4.10.22a)	<p><b>Policy 16 Affordable Housing</b></p> <p><i>(C) Housing Type and Availability - Affordable housing should be permanently available to borough residents and where possible should contribute towards meeting the full spectrum of affordable housing needs, with units remaining as affordable to both initial and subsequent occupiers. Typically 70% of the affordable units should be affordable to people on low incomes who cannot afford general market housing, and 30% should be intermediate housing for people on moderate incomes to buy or rent at below market value. Higher proportions of intermediate housing are appropriate where higher density proposals are acceptable or where there is an existing high concentration of social housing.</i></p> <p><i>Affordable housing will be deemed to be permanently available where: it is secured through a suitable section 106 obligation; is initially</i></p>	Inspector's recommendation accepted but additional change proposed	Although it is Council's preference that housing remains affordable in perpetuity, it has become apparent that the restriction to 75% equity in a shared ownership scheme is not always practical. For example, it is not possible to impose such as restriction if Housing Corporation funding is required by either a Registered Social Landlord or Unregistered Body (approved by	MOD-T/67 MOD-T/68a

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	<p>transferred to an RSL; and, in the case of shared ownership units, not more than 75% of the equity can be acquired by the occupier, <b><u>where feasible</u></b>. Housing will be treated as affordable to people on low incomes who cannot afford general market housing if it meets the definition of affordability in para 4.10.11a.</p> <p>A range of unit sizes of affordable housing should be provided, having regard to local circumstances, site characteristics, and the aims of the borough's annual Housing Strategy. The affordable element should be demonstrated as being capable of being built as such without further design amendment, be available for occupation at the same time, or sooner, as other elements, and be distributed through different parts of a site. The tenure of different elements of a scheme should not be apparent from the siting, appearance or layout.</p> <p>.....</p> <p>4.10.22a <b><u>Although it is Council's preference that housing remains affordable in perpetuity, the restriction to 75% equity in a shared ownership scheme is not always practical. For example, it is not possible to impose such as restriction if Housing Corporation funding is required by either a Registered Social Landlord or Unregistered Body (approved by the Housing Corporation) to finance the provision of the shared-ownership accommodation. Therefore there is a need for flexibility in cases where an upper cap on staircasing is not feasible, providing the shared-ownership provider makes reasonable endeavours to repurchase a unit when the shared-ownership occupier wishes to sell and has acquired 100% of the equity. The latter will require the inclusion of appropriate provisions within the shared-ownership lease so as to allow the shared-ownership provider to repurchase in such instances.</u></b></p>		the Housing Corporation) to finance the provision of the shared-ownership accommodation.	
Policy 17	<p><b>Policy 17 Flat Conversions</b></p> <p>(A) Minimum Size – The conversion of dwellings into flats will be permitted where the property has an original, pre-1948, (un-extended) floor area of at least 120 sqm <b><u>though this will be higher in areas where there is a need to safeguard the availability of three and four bedroom houses.</u></b> Conversions of a listed building will not be permitted where it would affect its character as a building of special architectural or historical interest. Conversions are not permitted where works would adversely affect the character or appearance of a conservation area.</p> <p>.....</p> <p>Insert new paragraph before 4.10.23a</p> <p><b><u>The minimum size threshold is generally 120 sq m but due to the</u></b></p>	Inspector's recommendation accepted but additional change proposed	In order to fully reflect the Inspector's views, a modification is proposed in respect of the size threshold, by stating that the size threshold will be higher than 120sqm in areas where there is a need to safeguard the availability of 3 and 4 bedroom houses. This is in accordance with national policy and the London Plan to ensure mixed and balanced communities ensuring that local housing supply meets the full range	MOD-T/69 MOD-T/72

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	<p><u>high levels of conversions activity in parts of the Borough, particularly Streatham Vale and Brixton, three and four bedroom houses of more than 120 sq m floorspace will be safeguarded. This is necessary to ensure mixed and balanced communities and a spread of the supply of local housing to meet the full range of needs. This is in line with Government policy and the London Plan. The Council's local housing needs assessment has highlighted a shortage of 3 and 4 bedroom family accommodation. A report for the GLA London Assembly ('Size Matters: The need for more family homes in London June 2006) states that there is a surplus of 12,000 one bedroomed properties in London but a shortfall of over 28,000 two, three and four bedroomed dwellings, for which there is greatest need.</u></p> <p><u>Most new housing supply in recent years and in the future housing development pipeline consists of 1 and 2 bed units. The supply of flats through house conversions has also been dominated by small units. An analysis of planning applications approved during 2004 and 2005 showed that 86% of all flats were 1 and 2 bed units. Streets in various parts of the Borough are now dominated by converted properties. This is not only reducing the choice and availability of accommodation for families but also has resulted in these areas experiencing stress on the environmental capacity to support such highly intensive levels of accommodation for which these properties and streets were not designed.</u></p>		<p>of local housing needs. The Council's local housing needs assessment has highlighted a shortage of 3 and 4 bedroom accommodation. A report by the GLA London Assembly ('Size Matters: The need for more family homes in London June 2006) also emphasised this issue.</p> <p>Most new housing supply in the Borough in recent years and in the housing development pipeline comprises of 1 and 2 bedroom units. The supply of dwellings coming as a result of house conversions has also been dominated by small units. An analysis of planning applications approved during the year 2004 and 2005 showed that 86% of the flats were 1 and 2 bedrooms.</p> <p>Streets in various parts of the Borough are now dominated by converted properties. This not only reduces the choice and availability of accommodation for families but has also resulted in increasing pressure and stress on the environmental capacity of residential areas to support such increased intensity levels of accommodation in houses and streets which were not designed for such high and intensive levels of occupation.</p>	
Policy 20	<p>That the RDUDP be modified by amending paragraph (B) of Policy 20 to read as follows:</p> <p><b>(B) Residential Requirement - In areas specified in (A), in addition to active frontage uses (where required),</b></p>	Inspector's recommendation accepted, but minor change	<p>For the reasons set out in the Inspector's report.</p> <p><b>Note:</b> for the purposes of clarity</p>	MOD-T/74

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	<p>where an increase in commercial floorspace of greater than 200 sq.m. is proposed then <b>an equal amount of floorspace</b> of functionally independent residential accommodation with separate access should be provided. The amount of residential floorspace may be adjusted in individual cases taking into account the site location, its physical characteristics, existing mixed use on the site which will be retained, the character and function of the area, the need to promote the regeneration of the area, <b>public transport access</b>, and the likely impact on sustainability, overall travel patterns and car use." (FC22-amended)</p>	suggested	"public transport accessibility" will be used rather than "public transport access" as a more accurate planning terminology.	
Para 4.12 & 4.12.0	<p><b>4.12 Opportunities to Work</b></p> <p><u>4.12.0 Policies 21 to 23 provide guidance on the safeguarding and protection of employment land and buildings in different circumstances. They apply separately in their own right. Policy 21 applies to offices, Policy 22 to Key Industrial and Business Areas and Policy 23 to the location of other employment uses.</u></p>	Inspector's recommendation accepted but additional change proposed	There is a need to clarify how the three policies relating to employment land inter-relate. At present it is unclear, particularly with regards to B1 offices, whether a combination of policies should be used to assess the suitability of a use in a particular location. As such the proposed modification makes it clear that the use should only be assessed under the policy most relevant to that use.	MOD-T/75
Policy 21	<p>I recommend that the RDUDP be modified by amending Policy 21 to read as follows:</p> <p>ii) regard will be had to public transport. Proposals that would exceed the capacity of existing, <b>or firmly proposed improvements to</b>, public transport infrastructure will be resisted..." (FC23)</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> The Inspector's recommendation to include consideration of firmly proposed improvements to public transport infrastructure is supported. However in the sentence before this, his recommendation has removed the word "capacity". As public transport capacity is a critical issue when considering large-scale office development, it is considered that the term should be reinstated.</p> <p><b>Action:</b> Include the following text as</p>	MOD-T/76

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			the first two sentences of section (ii) of Policy 21: '(ii) regard will be had to public transport capacity. Proposals that would exceed the capacity of existing, <b>or firmly proposed improvements to,</b> public transport infrastructure will be resisted.'	
Policy 22	<p><b>Policy 22 Key Industrial and Business Areas</b> .....</p> <p><b><u>In addition, in limited circumstances, development of sites or use of buildings in KIBAs for school purposes may be acceptable if:</u></b></p> <ul style="list-style-type: none"> <li>a) <b><u>No other suitable site is available in terms of size and location;</u></b></li> <li>b) <b><u>The site is readily accessible;</u></b></li> <li>c) <b><u>The use would be compatible with adjoining commercial uses and those in the wider area;</u></b></li> <li>d) <b><u>The use of the site would not have an unacceptable impact on the supply of industrial land; and</u></b></li> <li>e) <b><u>The location is environmentally suitable for its use.</u></b></li> </ul> <p>.....</p> <p>Insert new paragraph after 4.12.15A <b><u>The Council is carrying out a major programme transforming the quality, range and choice of educational provision for the Borough. This will largely involve extending existing schools or redeveloping schools on existing sites. However, in certain areas there may be difficulties to provide appropriate provision due to the lack of suitably sized sites in the right location to serve the required catchment area. In limited circumstances, therefore, where there are no other alternatives, it may be appropriate to allow the release of sites within KIBAs to meet such specific circumstances where such need cannot be met in any other way and provided it does not unacceptably affect the supply industrial land and meets the requirement of the policy on development of new schools (Policy 26 (D) and (I)).</u></b></p>	Inspector's recommendation accepted but additional change proposed	To indicate how the Council's planning policies will address the shortage of secondary school places within parts of the Borough. The Council is carrying out a major programme to transform the quality, range and choice of educational provision in the Borough through the Building Schools for the Future (BSF) Programme and by promoting new Academies. This objective will be pursued through extending existing schools or by developing new schools on existing sites where this is appropriate to meet the needs of catchment areas. However, sites, especially for secondary provision, need to be suitably sized and located to serve the required catchment area. To a large extent this can be achieved through using existing school sites. However, this is not possible within the Brixton catchment area. A new academy for Brixton is being proposed for a KIBA site at Shakespeare Road. This was referred to in the Council's evidence. The UDP Inspector was concerned that the Council should indicate how it intends to make	MOD-T/79 MOD-T/81

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			<p>provision for the shortage of secondary school places. The requirements for a new school are specific and there are limited options in terms of suitably sized and located sites to serve the required catchment area. The UDP recognises the importance of safeguarding employment land, however in terms of the Council's overall priorities and circumstances in respect of the overall availability of suitable sites, educational needs will take priority. The appropriateness of sites will need to be considered in relation to the overall availability of alternative sites, accessibility, suitability of the site in terms of compatibility with adjoining activities and that of the area as a whole, the environmental suitability of the site and the overall impact on the supply of industrial land in the area.</p>	
Policy 23	<p><b>Policy 23 Protection and Location of Other Employment Uses</b> -----</p> <p><i>Employment uses are defined as B Class uses, A2 uses (other than in shop premises), artists studios/rehearsal areas and galleries, <u>schools</u>, employment training and all other uses providing significant levels of employment, unless they would be defined in the plan as community facilities.</i></p>	Inspector's recommendation accepted but additional change proposed	To allow for the possibility of the use of the employment sites for school use, the definition of employment use has been extended to include schools. This reflects the UDP Inspector's concerns about how the Council's policies will address the shortage of secondary school places in parts of the Borough and as a recognition that schools are an employment activity involving a high intensity of jobs including teachers, ancillary and support staff.	MOD-T/83

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Policy 26	<p>That the RDUDP be modified as follows:</p> <p>G) Add another paragraph after paragraph 4.13.7 as follows:</p> <p><b>“The Council has no definite plans to create new Further &amp; Higher Education provision in the near future that would require a new site.”</b></p>	Inspector's recommendation not accepted	<b>Reason:</b> the Council does not have powers for the provision of Further and Higher Education. Also statements indicating what will not happen does not add to the plan's value.	
Policy 28	I recommend that the RDUDP be modified by replacing “Waterloo Visitor Management Area” with <b>“Strategic Cultural Area”</b> .	Inspector's recommendation not accepted	<p><b>Reason:</b> the London Plan's Strategic Cultural Area, shown diagrammatically in the London Plan, is similar geographically to the Waterloo Visitor Management Area, but the WVMA has other purposes. The Council will therefore add to the supporting text to say that many of the objectives of the WVMA are consistent with those of the LP's SCAs.</p> <p><b>Action:</b> add text to the end of paragraph 4.14.2 – <b><u>‘The Waterloo Visitor Management Area geographically broadly reflects the London Plan's Strategic Cultural Area but functions with a wider remit, such as e.g. management of coach parking.’</u></b></p>	MOD-T/98
Policy 29 (and Para 4.14.7a)	<p>I recommend that the RDUDP be modified by:</p> <p>B) Amend paragraph 4.14.7a</p> <p><b>“Subsequent to the Licensing Act of 2003 Lambeth,</b></p>	Inspector's recommendation accepted but minor clarification	<p>For the reasons set out in the Inspector's report</p> <p>However, as a point of clarification it</p>	MOD-T/101

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	like a number of other Central London Boroughs, is moving towards area based planning and licensing, a more tailored approach to hours of use etc. based on the characteristics of individual areas. The UDP will be used <b>alongside the Borough's Statement of Licensing Policy</b> to determine the land-use and amenity aspects of...."	suggested	is not necessary to implement the second recommended change to the paragraph in this instance as the 'The Borough's Statement of Licensing Policy' has been captured in a later reference to 'any area based supplementary and licensing guidance' which was also recommended by the Inspector (Recommendation D for Policy 29) The sentence would not make sense in implementing both recommendations.	
Policy 30 (and Para 4.14.9)	<p><b>Policy 30 Arts and Culture</b> ..... 4.14.9. Lambeth is home to the National Arts Complex - the South Bank Centre. It is also home to the Old Vic and Young Vic Theatres. The London Plan recognises the South Bank as being a strategically important area for arts, culture and entertainment in the Central London UDP co-ordination diagram. The part of this strategic cultural area within Lambeth is designated as the Waterloo Visitor Management Area on the Proposals Map (see policies 30 and 73). <u><b>The South Bank provides some of the most exciting opportunities in London for the development of arts and cultural facilities in the foreseeable future. The regeneration of the South Bank is a priority for the Council as well as all major stakeholders in the area. The criteria for enabling developments (listed above in Part B of this Policy) will be rigorously defined prior to and applied to any unrelated commercial developments at the South Bank Centre when or if such specific proposals are put forward.</b></u> Outside the South Bank <u>Centre</u> there is the Oval House Theatre and Community Arts Centre, <u>the National Theatre</u> and the National Film Theatre (which is proposing new premises). There are also significant cultural facilities in each of the Borough's town centres, Brixton being a centre of music venues such as the Ritzy, the Academy and the Fridge, as well as a major centre of the Black and alternative arts and music communities. Clapham has the Picture House and Stockwell, Vauxhall and the Oval are increasingly housing artist's workplaces and galleries. By contrast, Streatham has a lack of cultural facilities.</p>	Inspector's recommendation accepted and additional supporting change made by Council	To accompany the recommendation made by the Inspector and explain the Council's approach in supporting enabling development at the South Bank Centre.	MOD-T/102b MOD-T/103
Policy 33 (& Para 4.15.19)	I recommend that the RDUDP be modified in accordance with the Further Changes FC50 and 51 (relating to Policy 33 and paragraph 4.15.19 of the supporting text).	Inspector's recommendation accepted but minor change	<b>Action:</b> add new text to last sentence of paragraph 4.15.19 – 'Lambeth has <del>recently</del> adopted residential design guidance on residential alterations and extensions,	MOD-T/115 MOD-T/116

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		suggested	<p><b>as supplementary planning guidance to which regard should be had</b>, which elaborates on the policies contained in this section.' (FC51)</p> <p><b>Note:</b> The words "recently adopted" should be removed from paragraph 4.15.19 as these SPGs were adopted in 2000.</p>	
Policy 37 (& Paras 4.15.32 and 4.15.33)	<p>I recommend that the RDUDP be modified as follows:</p> <p>E) Add a new sentence at the end of the end of the same paragraph (4.15.32) to read:</p> <p><b>"The London Plan provides the strategic framework for tall buildings in the capital. Applications involving tall buildings will be referred to the Mayor for his views and over which he has a power of direction".</b></p>	Inspector's recommendation accepted but minor clarification suggested	<p>For the reasons set out in the Inspector's report</p> <p><b>Note:</b> for clarity of London Plan's role and remit and expanded wording will be used as follows –  <b>The London Plan provides the strategic framework for tall buildings in the capital. Applications involving tall buildings (<u>over 25m adjacent to the Thames and 30m elsewhere in the Borough</u>) will be referred to the Mayor for his views and over which he has a power of direction <u>of refusal</u>.</b></p>	MOD-T/128

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	<p>F) Amend paragraph 4.15.33 of the plan by deleting the final 2 sentences and creating a new paragraph to follow it to read:</p> <p>"4.15.33a Lambeth <b>will use</b> the criteria in the policy to select areas which might be most appropriate for high buildings. <b>These are more likely to be locations that would provide a focus and momentum for regeneration or growth or which have (or with the potential to have) high public transport accessibility and capacity. The Council, together with its partners, intends to carry out further work, in accordance with the English Heritage and CABE "Guidance on Tall Buildings" to assess if there are areas in the borough that can be specifically identified as appropriate for high buildings. Initially, it will produce development frameworks, for the Areas of Opportunity at Waterloo and Vauxhall/Nine Elms/Battersea. The recommendations and conclusions of those studies will be published as Supplementary Planning Guidance (or as Supplementary Planning Documents/ Area Action Plans) as they become adopted."</b> In this work, the relationship and height to historic buildings and skylines will be a very important factor. (FC55 amended)</p>	<p>Inspector's recommendation partly accepted</p>	<p>For the reasons set out in the Inspector's report</p> <p>For purposes of clarity amended wording is proposed to make clear how this work will be progressed –</p> <p>4.15.33a Lambeth <b>will use</b> the criteria in the policy to select areas which might be most appropriate for high buildings. <b>These are more likely to be locations that would provide a focus and momentum for regeneration or growth or which have (or with the potential to have) high public transport accessibility and capacity. The Council, together with its partners, intends to carry out further work, in accordance with the English Heritage and CABE "Guidance on Tall Buildings" to assess if there are areas in the borough that can be specifically identified as appropriate for high buildings. Initially, it will produce development frameworks, for the Areas of Opportunity at Waterloo and Vauxhall/Nine Elms/Battersea. The recommendations and conclusions of this will provide the evidence base for the preparation of SPDs and Area Action Plans for Waterloo and Vauxhall/Nine Elms. those studies will be published as Supplementary Planning Guidance (or as Supplementary Planning Documents/ Area Action Plans) as they become adopted."</b> In this work, the relationship and height to historic buildings and skylines will be a very important factor.</p>	<p>MOD-T/129</p>

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Policy 41a (& Paras 4.17.9a)	<p>I recommend that the RDUDP be modified as follows:</p> <p>B) Amend the final sentence of paragraph 4.17.9a to read:</p> <p>"In assessing buildings, the age, architectural or historic interest and the contribution to townscape will be important considerations <b>as well as criteria and guidance to be produced by English Heritage.</b>" (FC58)</p>	Inspector's recommendation accepted but minor change suggested	<p>For the reasons set out in the Inspector's report</p> <p>For purposes of clarity, the Council will refer only to guidance produced by English Heritage rather than guidance that may in the future be produced, as the Council is unable to make tangible reference to such guidance. This sentence will therefore read as follows – 'In assessing buildings, the age, architectural or historic interest and the contribution to townscape will be important considerations <b>as well as criteria and guidance to be produced by English Heritage</b>'.</p>	MOD-T/135
Policy 44	<p>Insert following Para 4.18.3: <u>Hungerford Car Park's designation as MOL was considered in considerable detail by the UDP Inspector. The Inspector considered the case put by the South Bank Centre that Hungerford Car Park is the only location within the South Bank arts and culture complex where a new auditorium could be located. He concluded that this was a persuasive argument. However, in the absence of specific proposals indicating the amount, form and location of any enabling development he concluded that at least for the time being that Hungerford Car Park should remain as MOL in its entirety.</u></p> <p><u>The Inspector stated that his deliberations were guided by the undisputed objective of retaining and creating a world class arts and culture facility on the South Bank fit for the 21<sup>st</sup> century. Balanced against which is the eminently sound planning objective of extending Jubilee Gardens to create a coherent public open space of metropolitan value to serve the increasing number of residents, workers and visitors.</u> <u>The Council supports this approach and will address this issue in detail as part of the preparation of the Waterloo Area Action Plan.</u></p>	Inspector's recommendation accepted but additional change proposed	To reflect the comments made by the UDP Inspector as to how the designation of Hungerford Car Park as Metropolitan Open Land should be viewed.	MOD-T/153
Policy 45 (& Para 4.18.14 and 4.18.16)	<p>I recommend that the RDUDP be modified:</p> <p>l) Amend the second sentence of Part B of the policy to read:</p> <p>"...unenclosed space. Buildings, paving,</p>	Inspector's recommendation partly accepted	<b>Reason:</b> The Inspector's revision to replace the reference to 'parks' with 'commons' is accepted, however there is also a need to clarify that these provisions will only apply	MOD-T/154

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	<p>extensions and enclosures are not permitted on commons land and on Rush Common protected land (as shown on the Proposals Map)."</p>		<p>where any proposed buildings, paving, enclosures or extensions are actually subject to planning control.</p> <p><b>Action:</b> Amend the second sentence of Part B of the policy to read:  <i>"...unenclosed space. <b>Where these are subject to planning control, buildings, paving, extensions and enclosures are will not be permitted on commons land and on Rush Common protected land (as shown on the Proposals Map).</b>"</i></p>	
	<p>4.18.14. Lambeth has <del>eight</del> <b>seven</b> open spaces on the English Heritage register of historic parks and gardens, including Brockwell Park, Archbishops Park and Myatt's Field. Lambeth will strongly support National Heritage Lottery bids to help secure improvements to these important and recognised open spaces.</p>	<p>Council-initiated change proposed</p>	<p>To correct a factual error.</p>	<p>MOD-T/159</p>
	<p>4.18.16. Playing fields in Lambeth are mostly in school grounds, although there are 5 private tennis clubs, a bowls club and two private school playing fields in the south of the borough. There is also the Brockwell Lido. Lambeth has a severe shortage of pitches. The Sports Council has estimated that there is a deficiency of 68 football pitches in Lambeth and many teams have to travel considerable distances to find a pitch for home, so a strict policy protecting sports pitches is required.  <u><b>Additional or improved facilities associated with the use of open spaces, such as toilets, changing rooms, or indoor sports facilities will be supported where these would assist in mitigating a shortfall identified in the Council's assessment of need. To be acceptable, proposals must be appropriate in terms of form and size, complement and be sensitive to the scale and nature of open space.</b></u></p>	<p>Council-initiated change proposed</p>	<p>To provide required clarity for criteria (i) of the policy about the type of small scale development that could be acceptable in areas on open space.</p>	<p>MOD-T/160</p>

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Table 13	<table border="1"> <thead> <tr> <th data-bbox="331 232 558 354"><u>OPEN SPACE CATEGORISATION</u> TYPES OF OPEN SPACE</th> <th data-bbox="558 232 747 354"><u>SIZE GUIDELINE</u> APPROXIMATE SIZE</th> <th data-bbox="747 232 989 354"><u>DISTANCE FROM HOMES TO OPEN SPACES</u> DISTANCE FROM HOME</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 354 558 402">METROPOLITAN PARKS</td> <td data-bbox="558 354 747 402">60 Hectares</td> <td data-bbox="747 354 989 402">3200m 3.2 kilometres</td> </tr> <tr> <td data-bbox="331 402 558 451">DISTRICT PARKS</td> <td data-bbox="558 402 747 451">20 Hectares</td> <td data-bbox="747 402 989 451">1200m 1.2 kilometres</td> </tr> <tr> <td data-bbox="331 451 558 508">LOCAL PARKS <u>AND OPEN SPACES</u></td> <td data-bbox="558 451 747 508">2 Hectares</td> <td data-bbox="747 451 989 508">400m 400 metres</td> </tr> <tr> <td data-bbox="331 508 558 678"><u>SMALL OPEN SPACES</u> OPEN SPACE MAKING PARTIAL CONTRIBUTION TO LOCAL PROVISION</td> <td data-bbox="558 508 747 678">Under 2 Hectares</td> <td data-bbox="747 508 989 678">Under 400m Less than 400 metres</td> </tr> </tbody> </table>	<u>OPEN SPACE CATEGORISATION</u> TYPES OF OPEN SPACE	<u>SIZE GUIDELINE</u> APPROXIMATE SIZE	<u>DISTANCE FROM HOMES TO OPEN SPACES</u> DISTANCE FROM HOME	METROPOLITAN PARKS	60 Hectares	3200m 3.2 kilometres	DISTRICT PARKS	20 Hectares	1200m 1.2 kilometres	LOCAL PARKS <u>AND OPEN SPACES</u>	2 Hectares	400m 400 metres	<u>SMALL OPEN SPACES</u> OPEN SPACE MAKING PARTIAL CONTRIBUTION TO LOCAL PROVISION	Under 2 Hectares	Under 400m Less than 400 metres	Council-initiated change proposed	As the table is now recognised as being sourced from the London Plan (see MOD-T/163), then it should be revised to ensure it more thoroughly conforms with Table 3D.1 in the London Plan.	MOD-T/162a
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Map 2 (& Para 4.18.20)	<p>I recommend that the RDUDP be modified by:</p> <p>A) deleting Map 2 (Open Space Deficiency Areas) and</p>	Inspector's recommendation not accepted	<p><b>Reason:</b> In his reasoning, the Inspector states that an alternative to deleting Map 2 from the plan would be to replace it with an up-to-date, accurate version. This is the course of action the Council intends to follow.</p> <p><b>Action:</b> Update Map 2 (Open Space Deficiency Areas) – see Modifications Document 4, Section 2.</p>	MOD-T/165															

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's recc. or Council change	Reason for Response / Action	Modification Number
Policy 50 (and Para 4.23.5)	<p>I recommend that the RDUDP be modified as follows:</p> <p>B) In part (B), clarify whether “<b>treatment facilities to recover value from residual waste</b>” is to be a complementary use to manufacturing either in the policy itself or in the supporting text</p>	Inspector's recommendation accepted but minor change suggested	<p>For the reasons set out in the Inspector's report</p> <p><b>Action:</b> In part (B) of the policy, at the end of the first sentence, add the following:  <i>'...are safeguarded for waste manufacturing and <del>complimentary</del> <b>complementary</b> manufacturing use, <u>including treatment facilities to recover value from residual waste.</u>'</i></p> <p><b>Note:</b> The word “complimentary” in the same sentence should be replaced with “complementary”.</p>	MOD-T/180
	G) Amend paragraph 4.23.5 to explain how the policy intends to deal with the gap in recycling facilities in the north of the borough.	Inspector's recommendation not accepted	<b>Reason:</b> There are no details available at present to explain how this issue is to be dealt with. In any event it would be a matter for the Waste Disposal Authority to procure additional recycling facilities.	
	4.23.5 The Council's Waste Recycling Plan aims to increase the number of residents in the borough who are participating in recycling services. There will be land-use requirements for recycling facilities for the separation of waste within developments. Lambeth has reviewed its requirements for land and facilities in the light of the targets in the national and the Mayor of London's emerging, waste strategies. It is dramatically increasing recycling bank sites, ensuring much better use of the household waste facility at Vale Street and is proposing local and/or centralised composting facilities. These are predicted to be able to meet needs over the lifetime of the plan. However it is accepted that there is a shortage of household recycling facilities in the north of the Borough. Boroughs are required to designate in their plans waste management/manufacturing areas. The purpose of these is to ensure that sufficient land is allocated for a variety of waste management facilities and options. Increases in recycling activity generally require a 'clustering' of complementary waste management and manufacturing uses to operate efficiently; materials recycling industries benefit from being located next to depots/materials reclamation facilities, transfer stations etc. <del>Three</del> <b>Two</b> sites in existing waste use, on Wandsworth Road and the depots on Shakespeare Road and <u>at</u> Vale Street, are so designated.	Council-initiated change proposed	The site on Shakespeare Road is used as a depot for the parking of refuse and street cleaning vehicles and not for waste management purposes. Council's records indicate that it has been a depot for Council fleet purposes for around 8 years and was used as a depot by Council and other organisations prior to that. There is no evidence of the site being used for waste management.	MOD-T/184

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
Policy 50a (& Para 4.24.2)	<p>I recommend that the RDUDP be modified as follows: D) Amend the final part of paragraph 4.24.2 to read:</p> <p><b>“The policy is written in such a way that it can accommodate any review of Government Guidance relating to planning obligations. Further details regarding planning obligations may also be provided in supplementary planning guidance.”</b> (FC79)</p>	Inspector's recommendation accepted but minor change suggested	<p>For the reasons set out in the Inspector's report</p> <p>For purposes of clarity and reference to the most relevant planning framework, 'supplementary planning guidance' at the end of the final sentence will be replaced with 'supplementary planning documents'.</p>	MOD-T/189
<b>Area and Site Policies (Section B)</b>				
Policy 51	<p>I recommend that the RDUDP be modified as follows: Add a new paragraph at the end of the policy to read:</p> <p><b>“(E) Opportunities</b></p> <p><b>Although not identified as an Opportunity Area in the London Plan the Albert Embankment lies between those at Waterloo and Vauxhall/Nine Elms. It may present a good opportunity to extend the South Bank Strategic Cultural Area into it within a new Opportunity Area. It is already within an Area of Regeneration. The Council will explore this potential with its strategic partners in the context of the Sub-Regional Development Framework.”</b></p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> the Council can accept the recommendation if it is in the form of additional supporting text, but not as an addition to the text of the policy. There is no mention of the extension of the South Bank Strategic Cultural Area southwards in the London Plan; the Albert Embankment is not within an Opportunity Area (mention is not made of this in the Mayor of London's representation); and mention should not be made in UDP policy of the Sub-Regional Development Framework that is the realm of the London Plan, albeit with the involvement of relevant stakeholders.</p> <p><b>Action:</b> Add new paragraph following para 5.2.1, as follows: <b><u>‘Although not identified as an Opportunity Area in the London Plan the Albert Embankment lies between those at Waterloo and Vauxhall/Nine Elms, and is within an Area of</u></b></p>	MOD-T/190

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
			<b><u>Regeneration. The Council will consider the role of this area as part of the preparation of Area Action Plans for Vauxhall and Waterloo.</u></b>	
Policy 56 (& Para 5.3.26)	I recommend the RDUDP be modified as follows:  A) Replace paragraph 5.3.26 to read as follows:  <b>“5.3.26 Brixton offers the potential for a series of high quality public spaces, which would be enlivened by the complexity, style and multi-cultural diversity of Brixton streets and people. Brixton could become a significant tourist destination and development sites have the potential to provide hotels as part of the mix of uses. The Brixton Oval/The Brixton Tate Library/Windrush Square public space is part of Rush Common. The landscaping and raised, planted beds here do not work as a public space. The adjoining Windrush Square was recently created through the clearance of industrial uses and celebrates the first ship of West Indian settlers in the UK.”</b> (FC83)	Inspector's recommendation accepted but minor change suggested	For the reasons set out in the Inspector's report. However a minor amendment to the Inspector's wording of the final sentence is proposed for clarity.  <b>Action:</b> Amend the wording of the final sentence as follows - <b>'The adjoining Windrush Square was recently created through the clearance of industrial uses and celebrates the arrival of the first ship of West Indian settlers into the UK.'</b>	MOD-T/195
MDO39(&22) (& Paras 5.5.3)	I recommend that the RDUDP be modified as follows: D) Add at the end of paragraph 5.5.3 a new sentence to read:  ....of its unique character. <b>“Any agreed masterplan will be adopted as supplementary planning guidance.”</b> (FC90)	Inspector's recommendation partly accepted	<b>Reason:</b> the reference in the Council's FC90 should have been to development planning guidelines that the Council was in the process of preparing. The masterplan was prepared on behalf of Clapham Park Homes and provided a broad strategy which the DPG has developed into more detailed guidance based on UDP policies and other relevant planning considerations. Council therefore proposes new text as follows –  “... of its unique character. <b>The Council</b>	MOD-T/209

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
			<u>has prepared guidance to assist development at Clapham Park which will be adopted as a formal Supplementary Planning Document</u> ".	
MDO51a	<p>I recommend that the RDUDP be modified by adding the following text:</p> <p>"An impact study may be required to establish the capacity of the local water and sewerage system to accommodate a development of this size and type."</p>	Inspector's recommendation not accepted	<p><b>Reasons:</b> the MDO is for a new secondary school that would be a replacement for the existing school use on the site. Therefore there is no specific need arising from the form of the future use for an independent impact study for this site as this is also already covered by Policy 48 (D). The Inspector has recommended that the Council employ the wording proposed by Thames Water, however no reasons have been given for this specific site to be an exceptional case. The Council therefore considers that no additional provision beyond the criteria of Policy 48 are necessary as this will satisfactorily deal with any issues and concludes that no further text is necessary for the MDO.</p>	
MDO69	<p><b>MDO 69 St Agnes Place (Area to East of Kennington Park) - Area: 3.1 Ha</b></p> <p><i>Restoration and extension of part-demolished street pattern. <b>Development of housing</b>; renovation of existing housing and development of infill sites; the former, unauthorized scrap yard, and the derelict greenhouse area behind it should be landscaped to provide a linkage between the two halves of the park, with limited development on either side to fund decontamination. Creation of a better link from Kennington Park to Kennington Park extension (including part in Southwark off Bolton Crescent). Improvement and consolidation of adjoining children's play facilities. Improvement of community facilities.</i></p>	Council-initiated change proposed	Due to changes in the condition of the site, such as the demolition of former housing, it is necessary to update the MDO to reflect this.	MOD-T/216

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
Policy 65 & Para 5.15.1)	<p>I recommend that the RDUDP be modified:</p> <p>C) Add the following after the third sentence in paragraph 5.15.1:</p> <p>“...London South Central area. <b>Vauxhall/Nine Elms/Battersea is identified in the London Plan as an Opportunity Area. The objective is to secure major environmental improvement with scope for intensification to provide some 1500 new homes and 7,600 new jobs in the wider Opportunity Area. This is an indicative target that the strategic plan would like to see exceeded when the Sub-Regional Development Frameworks are prepared. As part of any intensification, the strategy aims to secure improved pedestrian movement and create a stronger local sense of identity and strengthen the perceptual and visual links with the rest of Central London. The Council will work with its strategic and other partners to draw up and implement a comprehensive masterplan for the Opportunity Area.</b>”</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> amended text is proposed to more accurately reflect the current position. The preparation of the SRDF covering the Vauxhall area has not resulted in developing these indicative figures further. The Council's intentions are to prepare a statutory Area Action Plan for the areas as indicated in its Local Development Scheme.</p> <p><b>Action:</b> The Council therefore proposes to add the suggested text as set out in the Inspector's recommendation, but amended as follows:</p> <p>...London South Central area. <b>Vauxhall/Nine Elms/Battersea is identified in the London Plan as an Opportunity Area. The objective <u>for the Opportunity Area set out in the London Plan</u> is to secure major environmental improvement with scope for intensification to provide some 1500 new homes and 7,600 new jobs in the wider Opportunity Area. This is an indicative target. <del>that the strategic plan would like to see exceeded when the Sub-Regional Development Frameworks are prepared.</del> As part of any intensification, the strategy aims <u>will be</u> to secure improved pedestrian movement and create a stronger local sense of identity and strengthen the perceptual and visual links with the rest of Central London. The Council will work with its strategic and other partners <del>to draw up and implement a comprehensive</del></b></p>	MOD-T/223

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
			<del>masterplan for the Opportunity Area to try to achieve this through the preparation of an Area Action Plan for the area within Lambeth.</del>	
Policy 66 & Para 5.14.3)	I recommend that the RDUDP be modified as follows:  D) Add at the end of paragraph 5.14.3:  “...London and beyond. <b>To assist this the Streatham Design Guide looks at how Streatham High Road (A23) can be improved between Christ Church and the borough boundary. The focus of the Design Guide is on improving the public realm of Streatham High Road. This includes the widening of the footway and narrowing of the carriageway, and reducing street clutter by focusing on paving, street furniture, trees, lighting and signage.</b> ” (FC99)	Inspector's recommendation accepted but minor change suggested	For the reasons set out in the Inspector's report  For purposes of clarity and accuracy, the Council recommends that the first sentence is amended and expanded to highlight that the Streatham Street Design Guide is a Transport for London initiative, for their A23 highway, to be implemented with Council cooperation. It is therefore recommended the sentence reads as follows –  'To assist this the <u>TfL's</u> Streatham Design Guide looks at how Streatham High Road (A23) can be improved between <u>the</u> Christ Church Rd/Streatham Place junction and the <u>southern</u> borough boundary. The focus of the ...'	MOD-T/228

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
Policy 70 (& Para 5.15.1a)	<p>I recommend that the RDUDP be modified to read as follows:</p> <p>A) Amend the final sentence of the first paragraph of the policy to read:</p> <p><b>“A framework will be produced to guide development in the Vauxhall/Battersea Opportunity Area.</b></p>	Inspector's recommendation accepted but minor change suggested	<p>For the reasons set out in the Inspector's report</p> <p>For purposes of clarity and accuracy, in order to refer to the appropriate planning document and its scope of coverage the Council proposes to amend the text as follows –</p> <p><b>'An framework Area Action Plan will be produced to guide development in the Lambeth part of Vauxhall/Battersea Opportunity Area.'</b></p>	MOD-T/232
	<p>B) Amend the second sentence in paragraph 5.15.1a to read:</p> <p>“..benefit the local community. To this end a detailed Vauxhall Cross Battersea Development Framework will be produced as <b>an Area Action Plan for the Opportunity Area.</b> The overall regeneration aim...” (FC103)</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> for purposes of clarity and accuracy, in order to refer to the appropriate planning document and its scope of coverage the Council proposes to amend the text as follows –</p> <p>“..benefit the local community. To this end a detailed Vauxhall Cross Battersea Development Framework will be produced as <b>an Area Action Plan for the Lambeth part of the Opportunity Area.</b> The overall regeneration aim...”</p> <p><b>Note:</b> above paragraph to be renumbered 5.15.1b.</p>	MOD-T/235
MDO98 (& Proposals Map)	<p>I recommend that the RDUDP be modified as follows:</p> <p>A) Amend MDO 98 to read:</p> <p>“Improved tube entrance (with escalator). Part of site should be <b>developed as open</b> space as setting of new transport interchange. <b>Reservation of bus-priority lane on southern part of site would</b></p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> to improve clarity by confirming that Policy 45 on open space also applies in any development proposals for this site.</p> <p><b>Action:</b> amend text as follows –</p> <p>‘Improved tube entrance (with escalator). Part of site should be</p>	MOD-T/236

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	be encouraged.” (FC104)		developed as open space, <u>subject to Policy 45</u> , as setting of new transport interchange. <b>Reservation of bus-priority lane on southern part of site would be encouraged.</b> '	
MDO103	<p>I recommend that the RDUDP be modified by amending the third sentence of the text of MDO 102-5 to read as follows:</p> <p>“the entire MDO site. <b>The retention of the mid-Victorian building at 71 Bondway would be desirable</b>, with potential for development on former filling station/smaller warehouse to front and small site to south. Redevelopment of unsightly Keybridge House encouraged. New Vauxhall....”</p>	Inspector's recommendation not accepted	<p><b>Reason:</b> the commitment to retention of the building would be premature. The Area Action Plan will involve an assessment of the urban character and importance of individual buildings from the point of view of conservation as well as development in a comprehensive manner.</p> <p><b>Action:</b> amend Inspector's recommended text as follows – ‘...the entire MDO site. <b>The retention of the mid-Victorian building at 71 Bondway would <u>will</u> be desirable addressed as part of the preparation of the Vauxhall Area Action Plan</b>, with potential for development on former filling station/smaller warehouse to front and small site to south. Redevelopment of unsightly Keybridge House encouraged. New Vauxhall....’</p>	MOD-T/238
Policy 73 (& Para 5.16.1- 5.16.7a)	<p>I recommend that the RDUDP be modified in accordance with Pre-Inquiry changes PI 24-32 and PI 34 as they appear in CD4/20, <b>BUT</b> amended as follows:</p> <p>A) Amend part (c) of the policy to read:</p> <p>“compatible with and sensitive to adjoining sites and the immediate area, and <b>preserve or enhance</b> the character, appearance and setting of the conservation areas in and adjoining the area; “ (FC110)</p>	Inspector's recommendation partly accepted	<p>For the reasons set out in the Inspector's report, subject to three minor wording corrections (replacing “integrating” with “integrated” in the first sentence; adding “be” at the start of part (c); and adding “and” in the second sentence of 5.16.3.</p> <p>In relation to recommendation D, the Council accepts the intent of the recommendation, however, it is not</p>	MOD-T/243 MOD-T/243a MOD-T/244 MOD-T/245 MOD-T/246 MOD-T/247 MOD-T/248 MOD-T/249 MOD-T/250 MOD-T/251 MOD-T/252

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
	<p>B) Amend paragraph 5.16.5 of the supporting text to read:</p> <p>“The policy for Central London Activities (Policy 3) will also apply with other borough-wide policies that may be relevant to the development being proposed, such as for affordable housing (16), <b>office development (21)</b>, conservation areas (42 and Planning Obligations (policy 50a)...” (FC111)</p> <p>C) Relocate paragraph 5.16.4 of the supporting text to appear immediately following the policy, that is, <b>before</b> paragraph 15.16.1.</p> <p>D) After paragraph (e) of the policy and still within the policy panel add the following:</p> <p>“<b>In order to ensure that intensification of development is in step with public transport capacity, a transport strategy will be developed for the area, as will a Section 106 framework for pooling developer contributions in order to deliver public transport improvements in the area.</b>”</p> <p><b><u>Policy 73 Waterloo Development Framework</u></b></p> <p><b><u>Development in the Waterloo Development Framework Area (see Map X)</u></b> [located in Section 2 of Modifications Document 4] <b><u>should contribute to the comprehensive and integrated sustainable regeneration of the area in line with its Central London functions and its role as a strategic opportunity area. Development proposals should:</u></b></p> <p><b><u>(a) include a mix of Central London Activities (see Table 1), including maximising opportunities for housing and community facilities, appropriate to the size and character of the site and the scale of development proposed;</u></b></p>		<p>within the Council's powers to develop a transport strategy and therefore alternative wording has been put forward reflecting this but trying to secure the objective recommended by the Inspector. Similarly the wording on the approach to Section 106 has been amended to reflect the objective of securing planning obligations to deliver public transport improvements.</p> <p><b>Action:</b> The Council therefore proposes to amend the suggested text as set out in the Inspector's recommendation to the supporting text of Para 5.16.7 as follows:</p> <p><b><u>'In order to ensure that intensification of development is in step with public transport capacity, the Council will support the development of a transport strategy will be developed for the area, as will a and seek Section 106 framework agreements for pooling developer contributions in order to deliver public transport improvements in the area.'</u></b></p>	<p>MOD-T/253 MOD-T/254 MOD-T/255</p>

Policy/MDO/ Paragraph Number	Inspector's Recommendation or Change Proposed by Council	Reason for Inspector's rec. or Council change	Reason for Response / Action	Modification Number
	<p><u>(b) be of an appropriate scale and design for an area of world class quality;</u></p> <p><u>(c) be compatible with and sensitive to adjoining sites and the immediate area, and respect preserve or enhance the character, appearance and setting of the conservation areas in and adjoining the area;</u></p> <p><u>(d) maximise opportunities to enhance the public realm, remove barriers, and improve permeability, accessibility and the quality of the environment for residents, workers and visitors, as well as links to the rest of Central London; and</u></p> <p><u>(e) depending on its scale and nature, include provision for improvements to public transport and access to public transport.</u></p> <p><u>5.16.1 Waterloo is strongly linked to the Central London economy. It contains London's largest rail terminal, Waterloo, major office space, a major hospital and Lambeth Palace. The area also contains a substantial residential community, both in recent private developments and in long standing social housing estates. A substantial proportion of the area is covered by the South Bank, Waterloo, Roupell Street, Lower Marsh and Lambeth Palace conservation areas. It is noticeable for its major historic and architectural landmarks such as Lambeth Palace, the Royal Festival Hall, Waterloo Station, The National Theatre, County Hall and the London Eye. It is also strategically located adjacent to Bankside and the Elephant and Castle in Southwark and the Vauxhall/Nine Elms/Battersea corridor in Wandsworth.</u></p> <p><u>5.16.2 Significant development pressures exist in Waterloo, and the challenge is managing such demand to achieve much needed environmental improvements and facilities for the local community, whilst ensuring that the pattern of land use and transport infrastructure is a balanced one,</u></p>			

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	<p><u>protecting existing local residents and securing benefits for residents of the borough as a whole.</u></p> <p><u>5.16.3 The Council recognises that the Waterloo area is in need of regeneration to enable it to become a more attractive place to live, work and visit. It is recognised in the London Plan as an Area of Opportunity, within which residential and non-residential densities are expected to be maximised and carefully managed to take account of local residential amenity other needs. The indicative estimates of growth for the Waterloo Opportunity Area in the London Plan identify that the area could accommodate 15,000 new jobs and 500 new homes by the year 2016. Its highly accessible Central London location and its rich and varied mix of uses, including arts and cultural facilities of national and international importance, offer potential for regeneration and development, based on the principles of sustainability and social inclusion.</u></p> <p><u>Relocate following para (5.16.4) to immediately before para 5.16.1:</u></p> <p><u>5.16.4 The Council, in partnership with the Greater London Authority, Transport for London, London Development Agency, and Network Rail, and in consultation with all major stakeholders and the local community, will prepare a Waterloo Development Framework (WDF) to guide the future development and regeneration of the Waterloo Opportunity Area, as identified in the London Plan. The WDF will seek from development a balance between opportunities for commercial and cultural development, regeneration objectives, and protection of residential amenity and character. It will set the context within which inter-relationships between individual site-specific major development opportunities in the Waterloo area can be made, and in which regeneration opportunities can be addressed.</u></p>			

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	<p><u>5.16.5 This policy sets out the overall objectives and requirements for development in the area. Policies such as for, hotels and tourism (Policy 28), and arts and culture (Policy 30), which guide particular forms of development to the 'Waterloo Visitor Management Area' will continue to apply. The policy for Central London Activities (Policy 3) will also apply with other borough-wide policies that may be relevant to the development being proposed, such as for affordable housing (16), office development (21), for conservation areas (42) and planning obligations (policy 50a). Policies 74 and 75 deal in detail with the issues of public transport and urban design in Waterloo. Policy 75 requires major proposals in the Waterloo area to contribute towards the creation of an area of world class quality. Policy 73 highlights the importance of the aspects of policy that are integral to the successful sustained regeneration of the Waterloo Opportunity area, being fostering the development of appropriate uses, encouraging improvements to be made to the transport infrastructure (and prioritising programming projects), and creating a more focussed and recognised sense of place through promoting a comprehensive and connected approach to major development and excellence in urban design. When completed, the Waterloo Development Framework will provide more detailed guidance for the scale and nature of development in the area. It is intended that the WDF boundary as shown on Map X [located in Section 2 of Modifications Document 4] is fluid and outward-facing, recognising the broader policy context described above, and inter-relationships between the study area, adjoining local communities, the rest of the Borough, and the adjoining Borough, Southwark.</u></p> <p><u>5.16.6 Waterloo houses the internationally-recognised South Bank Arts Complex. The strengthening and improvement of the environment and accessibility of the cultural quarter, to fully reflect its role as a truly world-class arts and cultural</u></p>			

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	<p><u>facility on the South Bank is supported. The introduction of new employment, education, healthcare, leisure and housing uses, including affordable housing, will also be supported. In particular, mixed-use development will be encouraged. The Council will expect to work with developers, other agencies and local communities to encourage regeneration initiatives that foster social inclusion as part of new development. By providing training and support through regeneration initiatives, local people will be able to benefit from job opportunities provided in the Opportunity Area, as part of construction, and beyond.</u></p> <p><u>5.16.7 Many of the barriers to the sustained regeneration of the Waterloo area, relate to the transport infrastructure. Waterloo Station itself has a dominating presence, with its railway embankments, and the convergence of roads into central London divide the area. As a consequence, residents, commuters and visitors experience a very confusing public realm on several levels, with obvious pedestrian desire lines severed by road and railway infrastructure. The Area Framework presents an opportunity to comprehensively co-ordinate development to bring about significant improvements to public transport interchange and services, centred around a re-modelled Waterloo Station and immediate surrounds, and provide a safe and accessible environment for all users of existing and proposed public transport systems. Where appropriate, developers will be expected to contribute toward improvements to transport infrastructure. In order to ensure that intensification of development is in step with public transport capacity, the Council will support the development of a transport strategy for the area and seek Section 106 agreements for pooling developer contributions in order to deliver public transport improvements in the area.</u></p> <p><u>5.16.7a Waterloo's sense of place is based on its rich</u></p>			

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	<p><u>and special mix of close knitted residential communities, tourists, visitors and commuters, alongside the largest concentration of arts and cultural facilities in Europe, small and large national and multi-national organisations, specialised shops and restaurants and many other uses. By granting permission for development proposals with a very high standard of design, and which achieve a high level of physical integration with adjoining sites and the surrounding area, an enhanced sense of place and identity can be achieved. The Opportunity Area Framework will set out principles which will bring about physical integration of uses, and help to achieve an attractive, safe, legible and stimulating environment for residents, commuters and visitors.</u></p>			
MDO113 (& Para 5.16.43)	<p>I recommend that the RDUDP be modified as follows:</p> <p>A) Add at the end of paragraph 5.16.43 a new sentence to read:</p> <p>“ ... is to expand transport capacity. <b>Development should be consistent with the objectives of the Waterloo Development Framework</b>” (FC116)</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> the purpose of this recommendation is accepted, however it needs to reflect how this issue will be addressed, therefore different wording is proposed.</p> <p><b>Action:</b> amend proposed wording – ‘... is to expand transport capacity. <b>Development should be consistent with the objectives of the Waterloo Development Framework set by the planning strategy for Waterloo.</b>’</p>	MOD-T/261
MDO115 (& Proposals Map)	<p>I recommend that the RDUDP be modified as follows:</p> <p>A) Amend MDO 115 to read:</p> <p>“MDO 115 Shell Centre Upstream, Building and Offices, 2-8 York Road-Area: 2.4Ha</p> <p><b>Planning permission and conservation area consent was granted in 2004 for a scheme including part demolition and the erection of a mixed-use building of some 69000sqm on the</b></p>	Inspector's recommendation partly accepted and additional Council changes proposed	<p><b>Reason:</b> For the reasons set out in the Inspector's report</p> <p>Furthermore it is considered that</p> <ul style="list-style-type: none"> <li>the UDP should not hamper options for developments within the framework of the plan and preparations for the Waterloo Development Framework and the Waterloo Area Action Plan;</li> </ul>	MDO-T/262 MDO-T/262a

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	<p>podium site. The permission maintains pedestrian access across the site between York Road and Belvedere Road and provides for the storage and relocation of the Franta Belsky fountain. A number of planning obligations stand alongside the permission. They cover a range of topics including the loss of the on-site swimming pool, the re-instatement of the high level walkway should that be necessary, transport improvements, training and improvements to the public realm. If this permission is not taken up, it is nevertheless likely provide the template for any alternative scheme to develop the site in terms of size, silhouette, layout, conditions, planning benefits and improvements to the public realm.</p> <p>The utilisation of basement car parking/servicing to house operational parking for the South Bank Centre, being displaced from the Hungerford car park site, as well as some parking provision for people with disabilities and some parking for tourist coaches would be encouraged in any development.”</p>		<ul style="list-style-type: none"> <li>• the regeneration of the South Bank is a priority for the Council as well as all major stakeholders in the area;</li> <li>• there are sufficient UDP polices to assess alternative proposals should the existing permission for the MDO115 site lapse (specifically Policy 73 - Regeneration of Waterloo; Policy 28 - Hotels and Tourism; Policy 30 - Arts and Culture; Policy 3 - Central London Activities; Policy 16 - Affordable Housing; Policy 21 - Office Buildings; Policy 74 &amp; 75 Public Transport and Urban Design in Waterloo; Policy 37 - Tall Buildings); and</li> <li>• The Waterloo Development Framework and Waterloo Area Action Plan will seek a balance between commercial, social, and cultural regeneration developments.</li> </ul> <p>Additional wording is also being proposed about the potential contribution in any new development proposed of this site to:</p> <ul style="list-style-type: none"> <li>• linkages;</li> <li>• permeability; and</li> <li>• open space provision or contributions to generating improvements to open space within the wiser area,</li> </ul> <p>should the existing planning</p>	

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			<p>permission not be implemented.</p> <p><b>Action:</b> Revise MDO115 as follows</p> <p>-</p> <p><b>'MDO 115 Shell Centre Upstream, Building and Offices, 2-8 York Road – Area 2.4 Ha</b></p> <p><i>Retention of original tower and lower buildings (in South Bank conservation area) with re-use of basements, but no development on or enclosure of the podium, other than very minor works associated with the improvement of the public open space. Remodelling of pedestrian courtyard areas with active frontage uses, including facing onto York Road. Retail development should meet demonstrable need in accordance with relevant government guidance.</i></p> <p><b><i>Retention or reinstatement of the high level walkway through the site in order to achieve a high level pedestrian link from Waterloo Station concourse to the South Bank.</i></b></p> <p><i>Retention of through visual and pedestrian links across the podium.</i></p> <p><i>Development should preserve or enhance the South Bank Conservation Area and the setting of nearby listed buildings and protect the amenities of County Hall residents.</i></p> <p><i>Compensation for loss of swimming pool and sports facilities.</i></p> <p><i>Relocation of listed statue to north east corner of site would be acceptable.</i></p>	

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			<p><del>Improvements to the podium deck and surrounding public realm, Jubilee Gardens, highways and public transport.</del></p> <p><b><u>The Council will promote the contribution this site can make to permeability and pedestrian linkages as well as to open space provision either in its own right or to generating improvements to open space within the wider area.</u></b></p> <p><b><u>Planning permission and conservation area consent was granted in 2004 on appeal for a scheme including part demolition and the erection of a mixed-use building of some 69,000 sqm on the podium site. The permission maintains pedestrian access across the site between York Road and Belvedere Road and provides for the storage and relocation of the Franta Belsky fountain. A number of planning obligations stand alongside the permission. They cover a range of topics including the loss of the on-site swimming pool, the re-instatement of the high level walkway should that be necessary, transport improvements, training and improvements to the public realm. If this permission is not taken up it will still be a material consideration in deciding future proposals.</u></b></p> <p>The utilisation of basement car parking/servicing to house operational parking for South Bank Centre, being displaced from <b>the Hungerford car park site</b> Jubilee Gardens, as well as</p>	

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			<p><i>some parking, provision for people with disabilities and some parking for tourist coaches <b>will also</b> <del>would</del> be encouraged <b><u>in any development.</u></b></i></p> <p><b>Action:</b> Insert new Para 5.16.47a following MDO115 -</p> <p><b><u>'5.16.47a The regeneration of the South Bank is a priority for the Council as well as all major stakeholders in the area. The UDP is not intended to hamper options for development within the framework provided by UDP policies and preparations for the Waterloo Development Framework and the Waterloo Area Action Plan, which will seek a balance between commercial, social, and cultural regeneration developments. There are a significant number of UDP polices to assess alternative proposals should the existing permission for MDO115 lapse (specifically Policy 73 - Regeneration of Waterloo; Policy 28 - Hotels and Tourism; Policy 30 - Arts and Culture; Policy 3 - Central London Activities; Policy 16 - Affordable Housing; Policy 21 - Office Buildings; Policy 74 &amp; 75 Public Transport and Urban Design in Waterloo; Policy 37 - Tall Buildings).'</u></b></p>	

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MDO116	<p>I recommend that the RDUDP be modified as follows:</p> <p>B) Amend sub-paragraph (c) of MDO 116 to read:</p> <p>"...as an architectural group. Retaining the overall function and aesthetic success of the complex. Any replacement buildings should be of outstanding architectural quality." (FC119, amended)</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> Whilst the Council would agree with the Inspector that the phrase 'unity of overall form' is not particularly useful, it is there for the purpose of allowing the Council some degree of control over scale which it considers to be a very important consideration in any redevelopment of this site. The Council therefore proposes amending the wording of MDO116.</p> <p><b>Action:</b> Amend sub-paragraph (c) of MDO116 to:</p> <p>'...as an architectural group. Retaining the unity of <del>overall form</del> <b>scale</b> of the complex is essential to its function and aesthetic success...'</p>	MOD-T/264
MDO121	<p>I recommend that the RDUDP be modified as follows:</p> <p>A) Amend the first paragraph of MDO 121 to read:</p> <p>"Comprehensive development of whole site, retaining and fronting on to Royal Street. Proposals should seek to retain The Holy Trinity Centre and No.10 Royal Street since the Council's initial assessment is that the buildings make a positive contribution to the conservation area."</p>	Inspector's recommendation not accepted	<p><b>Reason:</b> The Council considers that the proposed wording offers no substantive difference other than to indicate that a full assessment has not taken place. In any case the Council considers that the buildings referred to are worthy of retention and this is adequately covered in the original wording.</p>	
MDO123 (& Proposals Map)	<p>I recommend that MDO 123 of the RDUDP be modified as follows:</p> <p>A) <b>"Part of the site is under consideration as an extension to the Lower Marsh conservation area. Development should seek to preserve those buildings that make a positive contribution to that area and those that frame/improve the road junction.</b> Active frontages at ground level within the edge-of-</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> The Council agrees with the Inspector's proposed first sentence. However, the proposed second sentence changes the emphasis of the text in the RDUDP from requiring 'development' to frame/improve the road junction, to requiring the preservation of buildings that frame/improve the</p>	MOD-T/267

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	centre boundary.		<p>road junction. It is the former aspiration that the Council wants conveyed within the text. The final sentence should also be modified to ensure it is phrased similarly to the previous sentence.</p> <p><b>Action:</b> Amend sub-paragraph A) to –  '<b>Part of the site is under consideration as an extension to the Lower Marsh conservation area. Development should seek to preserve those buildings that make a positive contribution to that area, including to the adjoining Lower Marsh Conservation Area, and those that <del>to</del> frame/improve the road junction. Active frontages are sought</b> at ground level within the edge-of-centre boundary.'</p>	
MDO127 (& Proposals Map)	<p>I recommend that the RDUDP be modified:</p> <p>A) by deleting MDOs 127 &amp; 128 and replace with the following:</p> <p>"MDO 127 Gabriel's Wharf and Prince's Wharf, Upper Ground - Area: 0.5 Ha. When redeveloped with mixed use but mainly affordable housing, should include a large public piazza with a rich mix of small active frontage uses with linkages to Princes Wharf site. <b>It can include offices for South Bank cultural/TV uses.</b> Retention of through pedestrian link from Upper Ground to Riverside Walk. Development should, together with Oxo Tower Wharf, provide consistent enclosure to Bernie Spain Gardens." (FC122-amended)</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> The Council considers that the building at 58 Upper Ground is worthy of retention and will acknowledge the importance of this building in the South Bank Conservation Area Appraisal that is currently being undertaken.</p> <p>Re-insert sentence referring to 58 Upper Ground as follows –  'Retention of through pedestrian link from Upper Ground to Riverside Walk. <b><u>Retention of historic frontage building at 58 Upper Ground.</u></b> Development should, together with Oxo Tower Wharf, provide consistent enclosure to Bernie Spain Gardens.'</p>	MOD-T/269

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MDO128	See recommendations at MDO 127 above.	As for MDO127	As for MDO127	
Glossary	<p><b>Development Plan</b> For the purposes of the <del>Town and Country Planning Act 1990</del>, the development plan for any London borough is the Unitary Development Plan. <u>Planning and Compulsory Purchase Act 2004, the development plan for London Borough of Lambeth consists of the Mayor of London's Spatial Development Strategy (the London Plan) and the Lambeth Unitary Development Plan.</u></p> <p>.....</p> <p><b>Gross Floor Area (GFA)</b> <u>The floor area of a building measured on the overall dimensions of each floor including the thickness of internal and external walls, stairs, lift shafts, corridors, halls and basements. Parking and loading areas (including those underground) and generally excluded.</u></p> <p>.....</p> <p><b>Sui <del>Generic</del>Genericis</b> Uses not falling within a defined use class, e.g. car sales, waste transfer, hostels, theatres, launderettes, petrol stations and amusement arcades.</p>	Inspector's recommendation accepted but additional changes proposed	<p>This definition needs to be updated due to changes in legislation through the introduction of the Planning and Compulsory Purchase Act 2004.</p> <p>The term 'GFA' is used throughout the UDP but has not been defined.</p> <p>To correct a spelling error.</p>	MOD-T/270 MOD-T/271 MOD-T/275
Proposals Map	<p>I recommend that the Proposals Map of the RDUDP be modified:</p> <p>A) as proposed in Further Changes FC123, FC124, FC125 and FC128 and</p>	Inspector's recommendation partly accepted	<p><b>Reason:</b> Due to an error, Archbishop's Park was identified as a Protected London Square in FC128. This is not the case. As such only the "Park" designation of Archbishop's Park should be extended in accordance with FC128.</p> <p>Other Inspector's recommendations pertaining to FC123 (Hungerford Car Park), FC124 (Lambeth Walk) and FC125 (Riverlink Square) should be accepted in full for the reasons set out in the Inspector's report.</p>	MOD-PM/4 MOD-PM/13 MOD-PM/5 MOD-PM/16

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			(See Modifications Document 4, Section 1, Maps 1, 10, 2 and 13)	
Proposals Map	Deletes the Waste Management and Manufacturing Area designation from the Shakespeare Road Depot – see Modifications Document 4, Section 1, Map 17	Council-initiated change proposed	The site on Shakespeare Road is used as a depot for the parking of refuse and street cleaning vehicles and not for waste management purposes. Council's records indicate that it has been a depot for Council fleet purposes for around 8 years and was used as a depot by Council and other organisations prior to that. There is no evidence of the site being used for waste management.	MOD-PM/18

**For further information contact:  
Lambeth Council Planning Service**

Phoenix House  
10 Wandsworth Road  
London  
SW8 2LL

Email : [PlanningPolicy@lambeth.gov.uk](mailto:PlanningPolicy@lambeth.gov.uk)  
Web : [www.lambeth.gov.uk/Planning](http://www.lambeth.gov.uk/Planning)