

MF9 Main Modifications (MMs) Note from the Inspector to the London Borough of Lambeth Council

Introduction

1. This Note sets out my initial thoughts on selecting the main modifications (MMs) to the Draft Revised Lambeth Local Plan Proposed Submission Version, (the Plan). My Note uses the Council's Proposed Changes Document [SD17b – Schedule of potential changes (updated 4 December 2020)] as the starting point. However, I have also had regard to the 44-point Action List, which covers matters raised at the hearings which led to further work from the Council and other parties and which in some cases has resulted in agreed positions (including Statements of Common Ground) between the Council and various other parties. I have also had regard to all the written evidence submitted in response to the submitted Plan and statements in response to my Matters, Issues and Questions (MIQs) Discussion Note and also to points made verbally during the hearing sessions.
2. The following table, SD17b – 1, adds a column to the Council's Schedule of Potential Changes to set out my response, where appropriate, to the Council's proposed changes. The table classifies the Council's Schedule of Potential Changes into the following categories:
 - (i) The minor changes, which I consider do not go to soundness and which are therefore not considered necessary for me to recommend their inclusion in the Plan. However, it is entirely for the Council to decide whether some or all of these changes merit inclusion in the Plan, e.g. to correct errors, improve the style or add detailed aspects of description.
 - (ii) A small number of changes to the policies map, which are outside the remit of my report and which therefore cannot be included as Main Modifications (MMs). However, I see no reason for these changes not to be included within the Plan.
 - (iii) The Main Modifications (MMs), which I consider are necessary for the soundness of the Plan. A high proportion of these reflect the changes to the Government's Use Classes Order dating from September 2020, i.e. after the Plan was submitted, and do not generally speaking change the policy thrust of the Plan.
3. Most of the MMs have been suggested in their entirety by the Council. However, in a small number of cases, I have introduced either a changed MM or in a very few cases, a completely new MM. MMs which are wholly or partly changed, based on my responses, are indicated in blue in the interests of clarity and transparency; and I have attached the reasons for their inclusion in the right-hand column of the table.

4. In summary, the MMs where I have introduced changes to the Council's Potential Changes Document [SD17b] are:

- Deletion of policy H2 (a) (iv) [Delivering affordable housing], where it applies to sites of up to 10 units and corresponding explanatory text. [MF1 and 2]
- Recommended reference to a map of the Miles Street Character Area. [MF3]
- Deletion of policy H13 (a) (iii) [Large-scale purpose-built shared living] referring to rent control and corresponding explanatory text. [MF4 and 5]
- Amend policy ED2 (a) [Affordable workspace] to refer to the proposed uplift of the net internal area as opposed to the overall extent of the enlarged area. [MF6]
- Amend policy ED2 (h) [new paragraph] to introduce flexibility into the timing of the provision of affordable workspace. [MF7]
- Amend policy ED3 [Key Industrial and Business Areas (KIBAs)] and supporting paragraphs, to introduce flexibility to enable the policy to be effective in encouraging and maintaining investment in both business and industry and corresponding explanatory text. [MF8-10]
- Amend policy ED14 [Hotels and other visitor accommodation] to support hotels and other visitor accommodation within the Waterloo CAZ boundary subject to impacts on residential amenity and the mix and balance of local land uses in addition to other parts of the Borough, and corresponding explanatory text. [MF11 -13]

5. Once the Council has considered the table below and has had the opportunity to discuss the proposed changes and including those I have suggested, the MMs in the table will undergo public consultation for a minimum of six weeks. Following this, I shall firstly, consider carefully any responses to the suggested MMs and then submit a report to the Council on the soundness of the Plan. The Council will be given a couple of weeks to carry out a fact check, then I shall send the 'final' report for the Council to use in order to adopt the Plan.

Mike Fox

Inspector