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Planning Policy  
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Dear Sir / Madam

**Representations to Lambeth's Main Modifications Draft Revised Lambeth Local Plan (February 2021)  
Regulation 19 Consultation  
Geoffrey Close Estate**

Thank you for providing us with the opportunity for continued engagement with the new Local Plan process and the consultation on the Inspector's Main Modifications. I write on behalf of our clients, Bellway Homes Limited (London Partnerships) and Riverside Group, who has an interest in the above site. Our previous letter set out site information and context to our representations. These representations are in relation to Policy H11 (Estate Regeneration) and Main Modification 21.

**Comments on Main Modification 21**

*Policy H11 Estate Regeneration*

The Planning Inspector has acknowledged the need for a viability assessment to guide the appropriate and viable maximum amount of affordable housing in estate renewal schemes. We welcome the proposed modification as it seeks to clarify that the maximum proportion of affordable housing is being achieved and that the figure should be tested through viability scrutiny. As identified in our previous representations, this accords with the now Publication London Plan.

The Publication Plan (2020) at Policy H8(E) expressly refers to development proposals following the viability tested route and seeking to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Part D of the Policy recognises that demolition of affordable housing should be "replaced by an equivalent amount of affordable housing floorspace." The London Plan does not set prescriptive figures for the minimum level affordable housing sought in estate renewal schemes but maintains that equivalent replacement affordable housing should be provided.

We welcome the Inspector's Modification, however, we note that MM21 does not propose to delete the minimum level requirement of 50% affordable housing in the final scheme.

The text in the Schedule of Modifications reads as follows:

**Table 1: MM21**

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*Amend clause (a) as follows:*

Estate regeneration schemes must achieve at least 50 per cent affordable housing in the final scheme, based on habitable rooms. Applicants should demonstrate **through a viability assessment that they have sought to maximise the proportion of affordable housing in the scheme and should where possible provide more than 50 per cent.**

*Amend para as follows:*

We consider that the wording in relation to achieving at least 50% is contrary to the intention of affordable housing being determined “through a viability assessment”. The wording should be adjusted further to account for applicant’s **seeking to achieve a figure of 50%**, rather than setting a strict minimum amount for each new scheme to deliver. We support the aspirations of achieving significant levels of affordable housing and a target level of 50% is supported. Notwithstanding this, the current minimum requirement does not account for the varying factors that make each estate renewal schemes different. It also does not align with the proposed modification of affordable housing following the viability tested route.

As part of the redevelopment of the Geoffrey Close Estate, the key driver is to address the issues of overcrowding and to deliver larger affordable accommodation in accordance with resident’s needs. Allied to this, the proposals are not just replacing units on an equivalent basis, as set out at Part B of Policy H11, but are delivering new larger affordable housing in response to the pressing needs of the estate. In this case there is an uplift of 46% additional affordable floorspace.

Bellway and Riverside continue to have concerns in relation to setting a prescriptive approach in relation to a 50% minimum for affordable housing and this should be amended. There is a degree of contradiction between following a viability testing route and setting a strict minimum requirement of affordable housing. We consider that the policy should be adjusted to account for applicants **seeking to achieve 50% whilst following the viability tested route.**

## Future Participation

I trust that the above is of assistance in the preparation of the new Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the new Local Plan in the future. If you have any queries or would like to discuss, please don’t hesitate to get in contact with me.

Yours faithfully

**Giuseppe Cifaldi**  
Associate

Enc. As above

cc. Dan Brady, Bellway Homes (London Partnerships)  
Sophie Lejeune, Riverside  
Steven McIntosh, Riverside  
Kieran Wheeler, Savills