

**Catherine Carpenter**

Head of Policy and Place-Shaping  
Planning, Transport and Development  
Sustainable Growth and Opportunity  
London Borough of Lambeth

**Department: Planning**

Our reference: LDF22/LDD16/LP01/DR01  
25 March 2021

By email to:

[ccarpenter@lambeth.gov.uk](mailto:ccarpenter@lambeth.gov.uk)

localplan@lambeth.gov.uk

Dear Catherine

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Draft Revised Lambeth Local Plan main modifications**

The Mayor has carefully considered the Lambeth Local Plan main modifications and can confirm that, with these modifications, the Lambeth Local Plan is in general conformity with the London Plan 2021. However, in the light of amendments made to London Plan policy D9 and to avoid confusion in the application of that policy, Lambeth is asked to consider the following comments.

**Lambeth's Schedule of proposed modifications - Tall building definition**

**Schedule reference PC224 – Policy Q26 Tall buildings**

The proposals to move the supporting text from paragraph 10.147 into the tall building policy to define a tall building risks the borough having a confusing definition of a tall building, particularly in light of the amendments to London Plan Policy D9 that sets a minimum height that a tall building can be defined as in metres and storeys.

The proposed text before the table of building heights contains a number of different definitions for a tall building (some of which have no specific height stated) and this text combined with the table of building heights may make it difficult to assess if a particular development is a tall building or not. For example, a 30m building in the Thames Policy Area could be a tall building according to the policy text as the threshold height for referring planning applications to the Mayor is 25m or more in height, however, the table in the policy states that, in this area, a tall building is a building above 45m.

Lambeth has defined tall buildings for all parts of the borough in the table showing low-rise, mid-rise and tall building. Thus, there is no need for other tall building definitions to meet the requirement of the London Plan Policy D9 part A.

To clarify the policy and minimise confusion in its application and the application of London Plan Policy D9, it is suggested that the text in paragraph 10.147 is deleted and only the table of building heights is added to the policy with text added to the 'Tall' column of the table to avoid any ambiguity over which building heights are tall buildings.

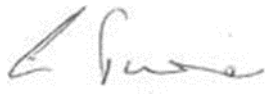
Below is an extract from the Schedule of Proposed Modifications for this policy and the recommended changes to clarify the definition of a tall building are in blue strikethrough for deleted text and bold blue for new text.

PC224	322	Q26	<p><del>Move Delete</del> supporting text para 10.147 <del>and move (including table)</del> into body of Q26 policy before clause (a) as follows:</p> <p><del>Tall buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor. In accordance with London Plan policy D9A and to inform the application of this policy</del></p> <p>†The following definitions of building height are defined for Lambeth:</p> <table><tr><td></td><td><b>Low rise</b></td><td><b>Mid rise</b></td><td><b>Tall</b> <i>(this policy applies to these buildings)</i></td></tr><tr><td><b>South Lambeth (south of the South Circular Road)</b></td><td>Up to 9m</td><td>Between 9m and 25m</td><td>Above 25m</td></tr><tr><td><b>Middle and north Lambeth (north of</b></td><td>Up to 15m</td><td>Between 15m and 45m</td><td>Above 45m</td></tr></table>		<b>Low rise</b>	<b>Mid rise</b>	<b>Tall</b> <i>(this policy applies to these buildings)</i>	<b>South Lambeth (south of the South Circular Road)</b>	Up to 9m	Between 9m and 25m	Above 25m	<b>Middle and north Lambeth (north of</b>	Up to 15m	Between 15m and 45m	Above 45m	In response to Action 28 arising from the	MM131
	<b>Low rise</b>	<b>Mid rise</b>	<b>Tall</b> <i>(this policy applies to these buildings)</i>														
<b>South Lambeth (south of the South Circular Road)</b>	Up to 9m	Between 9m and 25m	Above 25m														
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			the South Circular Road)					
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If you would like to discuss this in more detail, please contact Darren Richards at [Darren.richards@london.gov.uk](mailto:Darren.richards@london.gov.uk) who will be happy to discuss any of the comments.

Yours sincerely



Lucinda Turner

**Assistant Director of Planning**

Cc: Florence Eshalomi, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG