



GERALDEVE

Lambeth Council
Planning Policy
PO Box 734, Winchester
SO23 5DG

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldevve.com

Via Email only - localplan@lambeth.gov.uk

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Our ref: Our ref: STH/CHMC/U0008043

Dear Sir / Madam

Representations to the Proposed Main Modifications to the Draft Revised Lambeth Local Plan 2020

We write on behalf of Stanhope PLC to make representations to the Proposed Main Modifications to the Draft Revised Lambeth Local Plan 2020

While the modifications to the Local Plan are generally supported, we have set out below some areas where we consider further clarification is needed in relation to the proposed approach to the delivery of affordable workspace.

The National Planning Policy Framework February 2019 identifies that Plans are “sound” if they are:

- (a) Positively prepared – provided a strategy which, as a minimum seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- (c) Effective – deliverable over the planned period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- (d) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this framework.

Paragraph 11 of the NPPF states plans and decisions should apply a presumption in favour of sustainable development. “For plan making” this means that:

- (a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- (b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;
 - (i) The application of policies in this framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - (ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”

Paragraph 15 notes that inter alia up-to-date plans should provide a framework for addressing housing needs and other economic, social and environmental priorities.

At paragraph 16 it is noted that plans should “be prepared positively, in a way that is aspirational but deliverable”... and “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”.

Draft Policy ED2 - Affordable Workspace

We note that the Inspector has proposed changes to Policy ED2 part a) to clarify the requirements for affordable workspace:

The Inspector has amended the policy and noted that

‘The policy should apply to the uplift in the Net Internal Area (NIA), not the total NIA, using the same principle as is employed for the determination of CIL’.

This modification is strongly supported.

The modifications to part c) are also welcomed in terms of clarifying expectations in phased developments.

The modifications to part f) that clarify the capped amount approach are also supported.

The wording at paragraph 6.14 states that:

“The policy will apply to all applications involving 1,000sqm or more gross office floorspace in the areas of Lambeth identified in part (a) of the policy, but the requirement for affordable workspace would only apply to the net uplift in office floorspace. This includes applications for the redevelopment and extension of existing offices, but will not include office floor-space that is ancillary to, or integral to the operation of, a hospital or other healthcare facility.

These modifications are also strongly supported.

Para 6.14 goes on to state:

The policy will also apply to planning applications that involve refurbishment of existing office space where this would result in an increase in the quality and rental value of the space.

The supporting text in para 6.14 appears contradictory as it suggests that if a developer retains an existing office building but refurbishes it, affordable workspace as a percentage of all existing floorspace should be provided if the rental value increases. Although the wording suggests if you extend an office building, affordable workspace will only need to be provided as a percentage of the net uplift of floorspace and not the entire building.

Further clarity on this approach would therefore be helpful as it is considered the policy should be consistent and only apply to net uplift in floorspace and not refurbishment schemes.

Conclusion

We would be grateful if the clarifications comments can be taken into account as part of the process and look forward to being kept informed of the next steps in terms of the emerging Local Plan.

We look forward to acknowledgement of receipt of these representations. Should you wish to discuss these representations further please contact Stephenie Thourgood or Charlotte McManus of this office.

Yours faithfully



Gerald Eve LLP