

Examination of the Draft Revised Lambeth Local Plan 2020 – Consultation on proposed main modifications

Lambeth Council response to the main modifications consultation March 2021

Lambeth Council wishes to make comments about the following four proposed main modifications:

Affordable housing in minor developments

MM11 – The Council is very disappointed with the proposed deletion of the policy provision seeking contributions to affordable housing from minor housing developments that provide between 1 and 9 units, based on a viability tested approach (DRLLP policy H2(iv)).

We would like to point out that footnote 50 remains in the London Plan 2021 (page 172 of that document) and was not deleted by the Secretary of State's direction, so this allows boroughs to continue to take this approach. We therefore respectfully ask the Inspector to reconsider the arguments and evidence put forward by the Council in response to questions under [Matter 3.2\(ii\)](#).

Our statement demonstrates the level of affordable housing need in Lambeth; Lambeth's position on housing affordability relative to London, the wider south east and England; and the contribution to housing supply from minor sites in Lambeth. Taken together this evidence provides a strong justification for DRLLP policy H2(iv), which is reasonable and proportionate because it is based on a case-by-case assessment of viability. The Council has deliberately avoided an inflexible tariff-based policy approach by requiring every case to be viability tested.

We also wish to stress again that this policy has worked effectively since its adoption in 2015 and has been successfully defended at appeal on numerous occasions as set out in our evidence to the examination. As a result, the policy has contributed directly to successful delivery of additional affordable housing in the borough, with no detriment to overall housing delivery as evidenced by our strong record in meeting housing targets and the Housing Delivery Test.

Affordable workspace

MM38 – Respectfully, the Council remains of the view that, in accordance with the evidence and arguments we presented to the examination ([Matters Statement 4.3\(i\)](#)), there is a sound justification to apply the policy requirement to the gross quantum of office floorspace rather than just the net uplift. This policy approach has been viability tested as part of the whole plan viability evidence and it is consistent with the well-established policy approach taken to affordable housing, which always applies to the gross quantum of housing, not the net quantum. The Council therefore respectfully asks the Inspector to give further consideration to this evidence.

However, if the Inspector remains of the view that the policy should only apply to the net uplift in office floorspace, in the view of the Council it would be clearer if the first sentence of clause (a) were to read as follows: "In accordance with London Plan policy E3, the council will apply the following requirements for ~~the uplift of~~ affordable workspace to the net uplift in new office floorspace, in the following locations: ..."

MM43 – As for MM38, if the Inspector remains of the view that the policy should apply to the net uplift of office floorspace only, it would be clearer if the following sentence were deleted from paragraph 6.14: “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.”

Visitor accommodation

MM88 – The Council remains of the view that there is a sound justification for a moratorium on further hotels in Waterloo, based on the evidence and arguments presented to the examination (see [Matters Statement 4.8\(i\)](#)). Respectfully, the Council asks the Inspector to give further consideration to this evidence.

However, if the Inspector remains of the view that the proposed moratorium on further hotels in Waterloo should be deleted, the Council considers that there should at least be no difference in approach between the policy for Waterloo and that for Vauxhall, as both areas fall within the Central Activities Zone and are partly within an Opportunity Area. As drafted, the proposed modified wording in clause (c) results in an inconsistency between the approach for Waterloo and the approach for Vauxhall set out in clause (b) of the policy. Both Waterloo and Vauxhall are within the Central Activities Zone (CAZ), so London Plan policy E10F applies equally to both. Clause (b) relating to Vauxhall is fully consistent with London Plan policy E10F because it makes the necessary distinction between strategically important serviced accommodation within Opportunity Areas, and smaller scale provision in other parts of the CAZ. It also acknowledges the exception in London Plan policy for wholly residential streets and predominantly residential neighbourhoods and the provision that support for offices in the CAZ should be subject to the impact on office space and other strategic functions. These are all important elements of London Plan policy E10F, that must be applied in the Lambeth part of the CAZ.

The proposed rewording of clause (c) of DRLLP policy ED14 in relation to Waterloo does not include reference to any of these provisions. In the view of the Council, if the proposed moratorium for Waterloo is to be deleted, there should be no difference in approach between Waterloo and Vauxhall and DRLLP policy ED14 should include the same level of assessment for both areas. Therefore clause (c) of ED14 should mirror clause (b).