

Survey response

Are you responding as an individual, or on behalf of a group or organisation?

Group/organisation

If you are responding on behalf of a group or organisation please tell us:

Walcot Foundation

Please provide comments on the proposed Main Modifications to the Draft Revised Lambeth Local Plan 2020 in the text box below: Please make clear which Main Modification(s) you are commenting on by including a reference to the Main Modification (MM) number(s).

MM11 - 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] We fully support this Main Modification and the deletion of this policy as suggested by the Inspector for the reasons set out in his response in January 2021. As outlined in the letter from the Secretary of State to the Mayor of London dated 13 March 2020, the approach is inconsistent with the Written Ministerial Statement (HCWS50) made by the Minister of State for Housing and Planning, Brandon Lewis, on 28th November 2014 which clearly sets out that affordable housing and tariff style contributions should not be sought on developments of 10 units or less. Further, the NPPF, paragraph 63 states that the "Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)." The NPPF defines 'major development' as: "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more." This approach is mirrored in Planning Practice Guidance Paragraph: 023 Reference ID: 23b-023-20190901. It is clear therefore that this suggested policy would be in breach of national guidance and the approach set out in the Written Ministerial Statement. The viability for smaller sites is often compromised due to significant build costs associated with the construction of apartments, especially when this is for smaller-scale apartment schemes delivering fewer than 10 units. The way in which the small sites Affordable Housing contribution was calculated in accordance with Policy H2 (ii), where the payment in lieu was the difference between the residual value of the development to be provided with 100% market housing and the residual value that would be achieved if it had included affordable housing, often resulted in a figure higher than what the scheme could afford when taking into account the site-specific costs. A viability appraisal would then have to be prepared, adding additional time and cost to the application process. It is therefore our view that this Main Modification should be deleted as proposed by the Inspector to ensure that the Local Plan is compliant with the National Planning Policy Framework, Planning Practice Guidance Paragraph: 023 Reference ID: 23b-023-20190901, the Written Ministerial Statement and the Letter from the Secretary of State to the Mayor of London.

Please provide comments on the sustainability appraisal of the Main Modifications in the text box below:

With regards to MM11, the suggested deletion of Policy H2 (a) (iv) [Delivering affordable housing], where it applies to sites of up to 10 units, we agree with the Council's conclusion in the Sustainability Appraisal that its removal does not impact upon the final Sustainability Appraisal score given. The removal of this policy brings the proposal Local Plan into line with Government guidance, however the objectives of the overarching policies for Affordable Housing remain, and importantly are not in conflict with national guidance.