

Survey response

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

Individual

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).

I would like the Inspector to reconsider the main modifications made to the Lambeth Local Plan 2020 relating to visitor accommodation, referred to as MM87 together with consequential changes. These relate to Lambeth Local Plan policy ED14 which is an updated version of the existing plan policy ED12.

I am concerned that the amendments proposed will lead to an unintended weakening of the ability of Lambeth to give due weight to the local context for development of new or expansion of existing visitor accommodation in residential areas. While local authorities should, of course, weigh up London Plan and national planning policies it should also be able to give considerable weight to the needs of the area and in particular the local context. "Town Centre" covers a huge variation in size and in many parts of Lambeth, away from the concentration of visitor accommodation in the northern section, most town centres are small and just serve the residential areas adjacent so unlikely to offer appropriate sites for visitor accommodation and hence Sequential Tests not the most appropriate assessment tool for considering such a development proposal in an out of town location in these areas.

I believe the amendment to include the new wording "outside of town centres proposals for new visitor accommodation will be assessed against the sequential test for main town centre uses in accordance with national planning policy" is wrong and will not provide good planning decisions in all of the borough. I believe that the main amendments to visitor accommodation policy have been made because of concerns or issues to do with the Waterloo area. Surely the whole point of local authorities regularly updating their development plans is that they reflect their local area's current and near future needs (and constraints) and these should not be replaced purely by national planning considerations?

The insertion of this wording, and deletion of "additional visitor accommodation outside of town centres will not be permitted" seems to suggest that a national policy should trump any local policy requirements while at the same time removing the locally considered directive of where it is desirable to local new visitor accommodation. This would allow new visitor accommodation to be approved outside a "town centre" purely because such town centre locations are small (as mentioned above) even if it contravenes local policies which have recently been carefully devised, fully consulted on, and adopted for that specific area.

I feel that the wording needs amending to make sure that Lambeth are required to give considerable weight to local context. If the Inspector does not feel it is appropriate to ban all such development outside town centre locations (the chosen policy for the Borough of Lambeth and one which local residents strongly support) then wording should be included to make the presumption that it will

only be allowed outside of town centres in exceptional circumstances, and in any event not where it would cause a local concentration of such accommodation nor in residential areas.

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