

Lambeth Local Plan Review

Issues Consultation Report

October 2018



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1 Introduction

1.1. What is the Local Plan?

The current Lambeth Local Plan was adopted in 2015 and sets a strong vision for development of the borough up to 2013. It sets out the planning policies for Lambeth and much of it is still up to date and effective.

However, since the Local Plan was adopted, there have been changes to national planning law and policy, a full review of the London Plan is taking place and there have been changes in Lambeth which mean that parts of the Local Plan need to be reviewed.

The updated Local Plan, together with the Mayor of London's London Plan and neighbourhood plans, will set out the vision and robust planning policies needed to direct and guide development in the borough over the next fifteen years to meet Lambeth's future needs.

This consultation report summarises the first stage of public consultation on the Lambeth Local Plan Review which took place for eight weeks from 9 October to 4 December 2017. The consultation report sets out:

- The stakeholders invited to take part in the consultation;
- The consultation and publicity methods used; and
- A summary of the responses received.

1.2. Preparation of a Local Plan

There is a legal process for the preparation of a partial review of the Local Plan. The council is required to consult with stakeholders at a number of stages, the first of which is known as 'Regulation 18'. Regulation 18 requires the council to notify stakeholders it is preparing a plan and to invite them to make comments with their views on what the plan should contain.

There is flexibility in how the initial stages of consultation and plan preparation can take place. For the Lambeth Local Plan Review, Regulation 18 will take part in two parts:

- Issues consultation: an opportunity for stakeholders to identify issues for the partial review.
- Draft Local Plan consultation: an opportunity for stakeholders to comment on the wording of the revised Draft Local Plan.

Following the second stage of Regulation 18, the council will publish the version of the draft Local Plan it intends to submit to the Secretary of State for Examination. This stage provides stakeholders an opportunity to submit comments on whether the draft Local Plan meets the tests of soundness and is legally compliant. This stage is known as 'Regulation 19'. The comments submitted at this stage are passed to the appointed independent Planning Inspector who will be undertaking the Examination.

The council is also required to prepare a Sustainability Appraisal. The Sustainability Appraisal considers the ways in which the Local Plan Review can contribute to improvements in environmental, social and economic conditions and is a way of identifying and mitigating any potential adverse impacts. It also makes sure that the proposals in the Local Plan Review are the most appropriate, given the reasonable alternatives.

The Sustainability Appraisal will take place in stages as the Local Plan Review goes through the process of preparation. At each stage, there will be an opportunity to comment on the Sustainability Appraisal.

2 Issues Consultation

2.1. Consultation objectives

The Issues consultation took place for 8 weeks from 9th October to 4th December 2017. It was an opportunity for stakeholders to identify what they thought are the key issues for the partial review of the Local Plan and how they should be tackled.

Ten issues for the Local Plan review were identified for stakeholders to provide comments on. Stakeholders were also able to identify other issues they thought should be reviewed and to make comments on the Sustainability Appraisal. The ten issues stakeholders were asked to comment on were:

- Housing growth and infrastructure
- Affordable housing
- Housing for older people
- Self-build and custom-build
- Business and jobs
- Town centres
- Hotels and visitor accommodation
- Improving air quality
- Transport
- Waste

For each issue, a series of questions were asked. These questions were developed around known areas of debate; in response to new forms of development; in response to government guidance; and in relation to perceived policy gaps.

2.2. Stakeholders

The council is required by law to prepare a Statement of Community Involvement (SCI) which sets out how and when stakeholders can be involved in the preparation of a Local Plan. The Lambeth Local Plan Review must comply with Lambeth's SCI, which was adopted in September 2015. A wide range of stakeholders have an interest in the planning system and the preparation of a Local Plan. The identified stakeholders for the Issues consultation were:

- Those who live, work and carry out business in Lambeth
- Tenants and leaseholders
- Residents' associations
- Community and voluntary groups
- Elected politicians
- Neighbourhood planning groups (existing and emerging)
- Business Improvement Districts and business networks
- Developers and landowners (and their representatives)
- Registered providers of affordable housing
- Infrastructure providers
- Statutory consultees (such as the Mayor of London, other London boroughs, Historic England, Environment Agency and Natural England)

The timetable for the Local Plan review is set out in Figure 1.

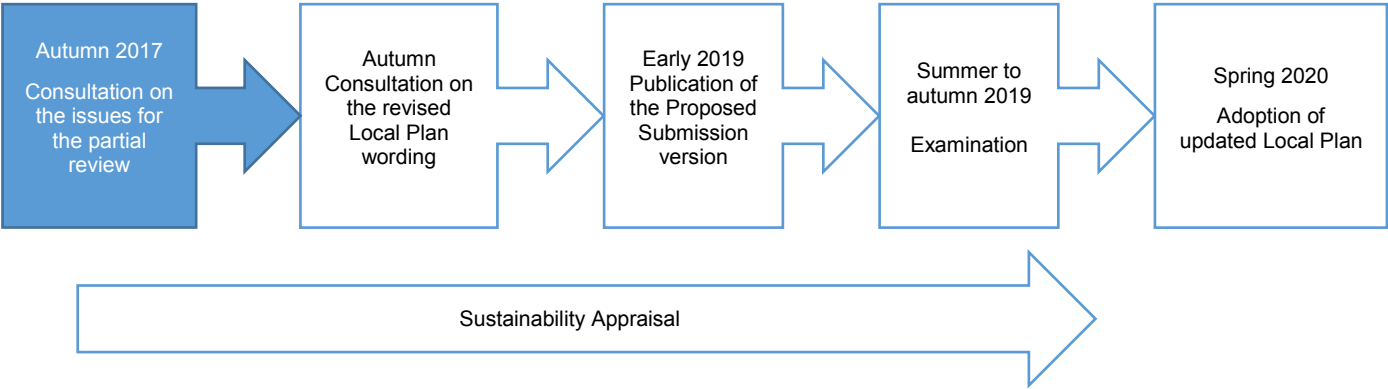


Figure 1 Local Plan timetable

To assess potential equalities impacts of the consultation approach, the key stakeholders were assessed against three levels of engagement: 'active'; 'aware and potentially active'; and 'unengaged and harder to engage'. This mapping exercise helped to identify the consultation and publicity methods listed in the right hand column of Table 1.

Table 1 Stakeholder mapping

Audience characteristic	Audience attribute	Stakeholder	Consultation/publicity method
Active	• Likely to be identified consultees (general, specific or other) • Established interest in planning and regeneration issues • Likely to be members of community organisations • Have a sense of belonging to their neighbourhood	• Politicians • Neighbourhood planning groups • Interest groups e.g. Air Quality Action Plan steering group • Developers and landowners • Registered providers of affordable housing • Infrastructure and service providers • Statutory consultees	• Notification by email and through bulletins/networks • Briefing for ward councillors • Individual meetings with neighbourhood planning groups • Discussion group with registered providers of affordable housing • Meeting with the Air Quality Action Plan steering group • Meetings with statutory consultees and service
Aware and potentially active	• Likely to read newsletters, council website, leaflets etc. • Easy to inform but not so easy to involve – maybe don't have the time or we don't provide the right opportunity • Might engage if we are in the right place or offer the right forum • Limited knowledge of planning and regeneration	• Tenants' and Residents' Associations • Community and voluntary groups • Special interest groups or networks • Businesses and business network	• Notification by email and through bulletins/networks • Advance email to community groups and networks with a request to cascade to members • Adverts in council publications • Promotion by ward councillors • Posters and leaflets in key locations across the borough • Meeting with Streatham stakeholders organised by Streatham BID
Un-engaged or harder to engage	• Don't really read the literature that the council sends • Think that what the council says doesn't really affect them • Limited knowledge of planning and regeneration • May not speak English as a first language • May not feel they have much of a stake in their local community	• Residents not involved in groups or networks • Those is more disadvantaged socio-economic groups • Some older people • Some young people • Some disabled people • Some black and minority ethnic groups	• Promotion and support from ward councillors • Posters and leaflets in targeted locations across the borough • Use of social media channels for those who may not read the more traditional council literature • Request for schools use the survey as a basis for activities with pupils • Publicity through the Young Lambeth Coop and Youth Council • Presentation to Lambeth Vision Group • Meeting with Lambeth Learning Disability Assembly • All consultation material to include detail of support available in libraries

In addition to the stakeholder mapping, a full Equalities Impact Assessment (EIA) was undertaken to assess the impact of the consultation on protected characteristics. This identified specific consultation and publicity methods needed to mitigate the impact on some protected characteristics.

Based on the findings of the EIA, the Issues consultation sought to include a particular focus on enabling disabled people in Lambeth to participate. To assess suitable consultation methods, officers sought the views of organisations working within 'We are 336' (the hub for disabled organisations in Lambeth) to seek specific advice about formats and techniques to help disabled people access the online survey and to find ways to feedback into the consultation. These discussions concluded that supplementary methods were needed in order to seek the views of stakeholders with a learning disability or those who are blind or visually impaired. Further detail on these methods is set out in 2.3.

2.3. Consultation methods

A targeted approach was taken to the consultation and publicity methods to ensure that stakeholders were given the opportunity to only answer the questions on the topics that were of interest to them and to ensure that the consultation as far-reaching as possible. Consultation methods were adapted to suit the needs of different stakeholders to ensure a full range of stakeholders were able to participate.

2.3.1. Online survey

The primary method for seeking stakeholders' views was an online survey, designed to be used on smart phones, tablets and computers. The online survey was divided into 12 individual surveys which allowed stakeholders to choose to answer all of the questions or just the questions related to the issues that interested them the most (see Appendix 1).

Each of the online surveys contained topic based 'summary sheets', containing key facts, background information, definitions and summaries of the evidence base. The purpose of the summary sheets was to provide respondents with all of the information they needed to answer the question in plain English, avoiding technical jargon wherever possible (see Appendix 2). The surveys also contained infographics which set out key facts and definitions, using visuals to help communicate the issues to stakeholders.

The EIA identified that some stakeholders may have difficulties in participating in an online survey due to factors such as a disability or lack of internet access. The online surveys were developed through a testing exercise with South East London Vision to test their accessibility. This testing suggested a number of changes to the online survey to improve accessibility for stakeholders who need to use screen readers and other accessibility software. Further testing was also undertaken by the council's sensory team.

Stakeholders who were not confident in using the online surveys were signposted to support available in libraries. If stakeholders did not wish to respond using the online surveys, they were provided details of how to respond separately by email or by post.

2.3.2. Consultation sessions

Supplementary consultation methods were used to target specific stakeholders. This mainly took the form of individual consultation sessions with specific stakeholders.

Air Quality Action Plan steering group

A presentation was given to the council's Air Quality Action Plan steering group on 18 October 2017. This focussed on the 'Improving air quality' survey and sought group member views on these questions. The minutes from this meeting can be found in section 3.12.

Neighbourhood Forums

Lambeth has five designated neighbourhood planning forums. To support neighbourhood planning and to seek the views of these groups on issues affecting their areas, all designated and emerging neighbourhood planning groups were offered an individual session to discuss the Local Plan Review. Sessions were held with:

- Southbank and Waterloo Neighbours Forum - 16th October 2017
- Kennington, Oval and Vauxhall Forum – 16th October 2017
- Norwood Planning Assembly – 19th October 2017
- Crystal Palace and Upper Norwood Forum – 30th October 2017
- Loughborough Junction Action Group – 2nd November 2017
- Herne Hill Forum – 24th November 2017

A session was also arranged with the Tulse Hill Forum but they did not attend. The minutes from these consultation sessions can be found in section 3.14.

Streatham Town Centre

A consultation session was held in Streatham Library on 1st November 2017 to discuss particular issues for Streatham town centre. The session was organised with the Streatham Business Improvement District (BID) and was attended by BID members, members of the Streatham Action group and Streatham ward councillors. The consultation session sought attendees' views on the boundary of Streatham town centre, the mix of uses and Streatham's night-time economy. The minutes from this consultation session can be found in section 3.14.

Lambeth Learning Disability Assembly Forum

A consultation session was held with the Lambeth Learning Disability Assembly Forum on 7th November 2017. The consultation session used accessible material to seek views on town centres and transport. Using pictures and maps, stakeholders were asked about what they like about their town centres and how they would improve them. Stakeholders were also asked how they travel around the borough and to identify any improvements needed to encourage them to walk and cycle more. The minutes from this consultation session can be found in section 3.9.

Registered Providers

Registered providers of affordable housing who operate in Lambeth were invited to a consultation session on 6th November 2017. This session focussed on the affordable housing survey and was attended by four registered providers. The minutes from this consultation session can be found in section 3.6.

Lambeth First

A presentation and workshop on the consultation was held with attendees of the Lambeth First event on 10th November 2017. Attendees were given an overview of the Local Plan Review and provided with details of how to take part. To provide context to the Local Plan, a presentation was given on two recent planning applications so attendees could understand the issues that need to be considered. Market researchers were available at the event so attendees could take part in the surveys following the presentation.

2.4. Publicity methods

A wide range of methods were used to raise awareness about the consultation and to encourage people to respond. The publicity methods aimed to target the full range of stakeholders, including those who had been characterised as 'un-engaged' or 'harder to engage'.

In addition to more traditional publicity methods, ward councillors, community groups and networks were encouraged to raise awareness about the consultation through word of mouth and 'cascading' amongst their constituents and members.

2.4.1. Ward councillors

Prior to the start of the consultation period, a briefing session was held for ward councillors. The purpose of the briefing was to provide ward councillors with an introduction to the Local Plan Review and to encourage them to support their constituents to respond. Councillors were given a copy of a presentation they could present to community groups and posters to advertise the consultation.

2.4.2. Lambeth Talk

An article was written for the autumn edition of Lambeth Talk prior to the start of the consultation. The article notified residents that the consultation would soon be taking place soon, set out what it would cover and the reasons why the Local Plan is being reviewed (see Appendix 3).

2.4.3. Website

All of the information relating to the Local Plan Review was set out on the council's website. A consultation landing page was launched on the 9th October and set out the background to the Local Plan Review, its process and the timetable. It also contained links to the individual surveys and set out how stakeholders could take part in the consultation (see Appendix 4).

Individual consultation pages were also set up for each of the issues. These pages provided further background to the issue and a link to the online survey (see Appendix 4). This helped stakeholders access information on the issues they were most interested in.

Information about the consultation was also included on the Planning Policy webpages on the council's website, with a link to the main consultation landing page. All of the Local Plan Review evidence base documents were also made available for comment.

2.4.4. Emails

All of the stakeholders in the planning policy consultation database were tagged based on their perceived interests. This tagging exercise allowed for a targeted approach to emails by targeting stakeholders with the online surveys that might be of the most interest to them.

Notification email

Following the tagging exercise, stakeholders were grouped into four categories. A notification email was sent on the 10th October 2017 and contained information on the Local Plan review, the consultation and how to take part. Four different emails were sent to stakeholders:

1. General

A general notification email was sent to all stakeholders where it was determined that they were mostly likely to be

interested in all of the issues. This generally included members of the public and statutory consultees and was sent to 1369 stakeholders (see Appendix 5)

2. Housing

A targeted notification email was sent to all stakeholders where it was thought they would have a particular interest in housing, for example registered providers of affordable housing. This email was sent to 348 stakeholders and included links to the housing growth and infrastructure, affordable housing, self-build and custom build housing and housing for older people surveys (see Appendix 5).

3. Transport and Environment

A targeted notification email was sent to all stakeholders where it was thought they would have a particular interest in issues related to transport and the environment. This email was sent to 96 stakeholders and included links to the transport, improving air quality and waste surveys (see Appendix 5).

4. Employment and Business

A targeted notification email was sent to all stakeholders where it was thought they would have a particular interest in issues related to employment and business. This email was sent to 166 stakeholders and included links to the business and jobs, hotels and visitor accommodation and town centres surveys.

Reminder email

A reminder email was sent to all stakeholders who had not yet responded to the consultation on the 7th November 2017. Stakeholders were grouped into the same four categories as the main notification email.

- General email: 1311 stakeholders
- Housing email: 337 stakeholders
- Environment: 91 stakeholders
- Employment and business: 156 stakeholders

Final reminder email

A final reminder email was sent to stakeholders five days before the consultation closed, encouraging them to take part. This was sent to 1,856 stakeholders.

Other emails

Throughout the consultation, analysis was undertaken on the stakeholders who were taking part in the survey to identify whether any other targeted publicity methods were required. This analysis identified that more publicity was needed to promote the consultation to underrepresented groups. An email was sent to community organisations working with underrepresented groups on 14th November and was sent to 475 stakeholders. This email encouraged these groups to publicise the consultation to their members.

A summary of the consultation and details of how to take part was also included in the November edition of the Council's 'community round up' email which was sent to 194 stakeholders.

2.4.5. Letters

Key Industrial Business Areas

A letter was sent to the land owners and/or occupiers in Lambeth's Key Industrial Business Areas (KIBAs) where it was proposed to change the boundaries. The letter set out background to the Local Plan Review, informed stakeholders where they could find the evidence base documents to support the changes and provided details on

how they could provide comments on the proposed changes. The letter was sent to 315 land owners and/or occupiers (see Appendix 6).

Town centres

A letter was sent to the land owners and/or occupiers in town centres where it was proposed to change the boundaries. The letter set out background to the Local Plan Review, informed stakeholders where they could find the evidence base documents to support the changes and provided details on how they could provide comments on the proposed changes.

The letter was sent to 98 land owners and/occupiers (see Appendix 7).

2.4.6. Love Lambeth

A blog post was published on Love Lambeth on 9th October. The blog post set out why the Local Plan was being reviewed, the timetable and the purpose of the consultation. It contained links to each of the individual surveys (see Appendix 8).

2.4.7. Posters

A bespoke poster was designed to promote the consultation in a range of locations across the borough (see Appendix 9). A total of 214 posters were distributed to the following locations:

- Council customer centres
- Libraries
- Leisure and sport centres
- Estate area offices
- Sheltered accommodation
- Day centres
- 336 Brixton Road (Lambeth's hub for groups representing disabled people)
- Workspace providers
- GP surgeries
- Community centres
- Schools (including nurseries, primary and secondary schools)

118 A5 versions of the posters were all distributed to some of the above locations to be distributed as leaflets.

Posters were also on display at the Residents Assembly on 30th September 2017 and the Lambeth First conference on 10th November 2017. Posters were displayed on the day and were also included in the agenda packs.

2.4.8. Social media

The consultation was widely promoted on the council's social media channels. A total of 108 tweets were posted during the consultation period which were seen by Twitter users 158,198 times. Specific tweets for each of the issues were scheduled and contained links to the individual consultation pages where people take part in the online surveys. The council also tweeted organisations such as the Royal Institute of Town Planning and local community groups to encourage them to promote the consultation amongst their members (see Appendix 10).

The consultation was also publicised on the council's Facebook page (see Appendix 10).

2.4.9. Young people

The EIA found it is important to seek the views of young people in the borough, particularly as young people may be less likely to engage with a council consultation or have an understanding of the planning system and the new Local Plan that as the new Local Plan will set the planning framework for the future of Lambeth over the next 15 years. The consultation targeted schools and youth organisations operating in Lambeth.

Headteachers in Lambeth's primary and secondary schools were asked to display posters where they could be seen by both pupils and parents. They were also asked to encourage pupils in years 10, 11, 12 and 13 studying humanities subjects like Geography or Citizenship to take part in the surveys as part of a tutor time activity.

A promotional article was written for the Lambeth School Services webpage to promote the consultation to schools (see Appendix 11).

Emails were sent to both Lambeth Youth Council and Young Lambeth Coop asking them to promote the consultation to their members on both their website and social media pages.

2.4.10. Internal communications

During the consultation the council's internal communication channels were used to promote the consultation to council staff. This included an article on the council's intranet and an article in the staff bulletin. Staff were also asked to promote the consultation to customers and residents using their regular newsletters. This included emails to the Green Champions network, Lambeth 500+, Business Improvement Districts and workspace providers.

2.4.11. Health and Wellbeing Board

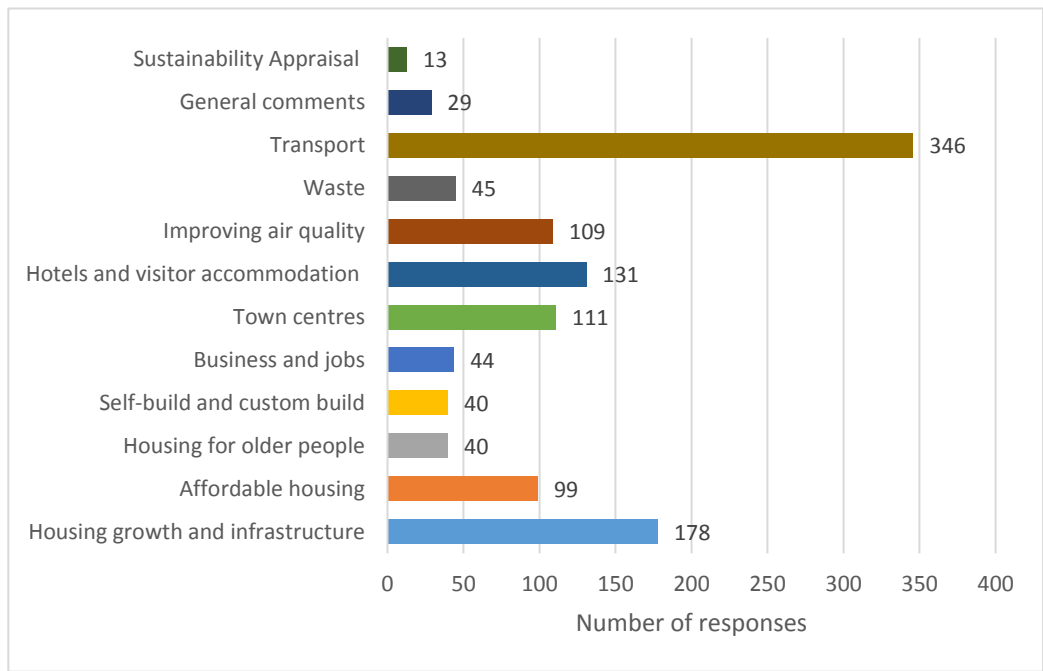
Council officers gave a presentation to the council's Health and Wellbeing Board on 12th October 2017. The presentation gave an overview of the consultation and highlighted particular issues relevant to health and wellbeing. Council officers also attended the Lambeth Healthy Weight, Food and Physical Activity Strategic Group to encourage Public Health to promote the consultation.

3 Consultation responses

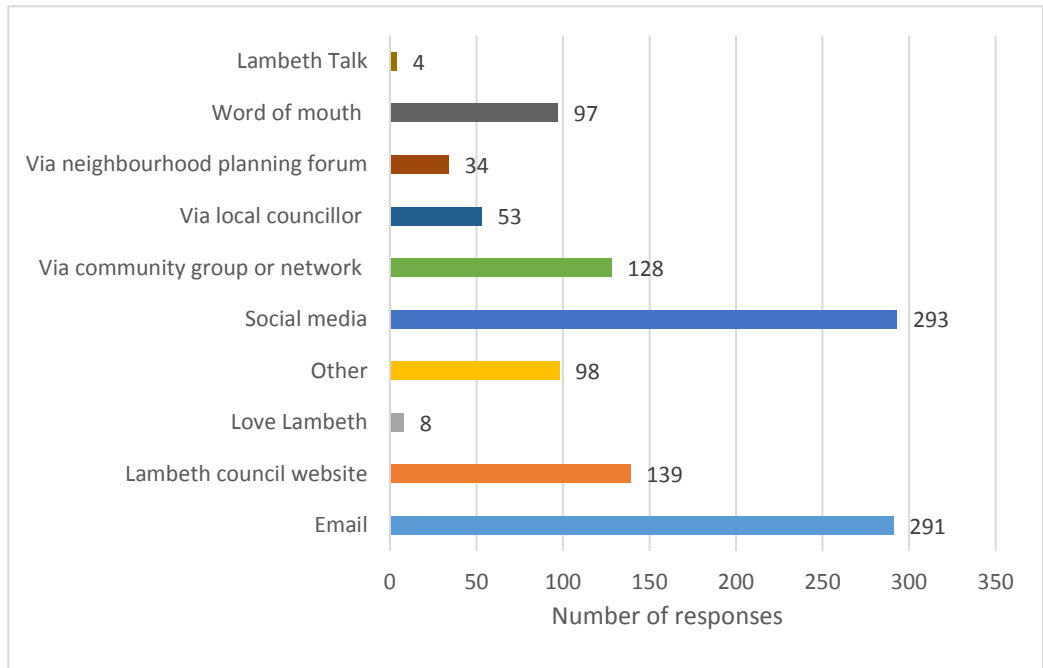
A total of 1,309 responses was received for the Issues consultation. This is broken down into survey responses and written responses in sections 3.1 and 3.2.

3.1. Survey responses

A total of 1,185 responses were received from the online surveys. The surveys with the most respondents were transport; housing growth and infrastructure; and hotels and visitor accommodation.



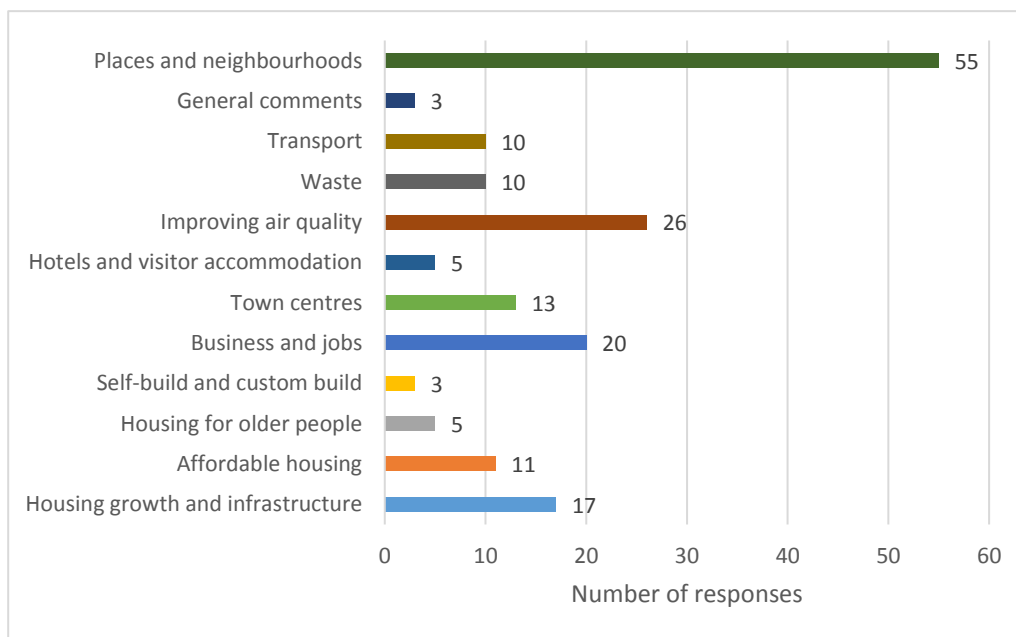
The majority of respondents heard about the consultation through social media, notification emails and the council's website.



Detailed demographic analysis for each of the survey respondents is included in sections 3.3 to 3.16. This includes analysis of the types of respondents, their age, gender and ethnicity. It also analyses whether any of the respondents had, or lived with, anyone who had a disability.

3.2. Written responses

A total of 124 written responses was received by email or by post. The issues that respondents provided comments on are set out below. It should be noted that some respondents who provided comments by email or by post may have commented on more than one issue.



3.3. Consultation responses summary

This section provides a high level summary of the main issues raised for each of the consultation issues. Detailed analysis of the responses for each question is set out in sections 3.5 to 3.16.

Housing Growth and Infrastructure

- The majority of respondents agreed with the limited release of industrial land for mixed use development to help meet Lambeth's housing targets.
- Mixed-use developments should provide space for small businesses, take account of public transport capacity, not negatively impact on surrounding areas and provide genuinely affordable housing for social rent.
- Other respondents commented that the release of industrial land would depend on the type of land and its location. Those who disagreed with the approach argued that the protection of industrial land is important to provide jobs and that small businesses don't provide the same type of jobs as industrial land.
- Just over half of respondents supported higher density developments in town centres and locations with good public transport accessibility. Some respondents only supported high density housing if it provides affordable housing whilst others said there needs to be capacity on the public transport network.
- 35% of respondents disagreed with higher density developments on the grounds that high densities has a negative impact on quality of life, cause overcrowding, create transient communities and cannot be supported by existing transport infrastructure.
- Nearly 80% of respondents disagreed or strongly disagreed with relaxing the requirements for private gardens and balconies due to the negative impacts on health and wellbeing and quality of life. Respondents also raised concerns about the impact on the environment, existing open spaces and the importance of green spaces for improving air quality. Suggestions were also provided of alternative ways that amenity space could be provided in new developments.
- Respondents who agreed with relaxing requirements argued that occupants of some types of developments may not want their own balconies or gardens and that there are alternative ways to provide more suitable amenity spaces.
- The majority of respondents strongly disagreed or disagreed with smaller space standards for new homes as it would have a negative impact on younger people who will eventually get married and want to start a family but will not have the space to do so. Other respondents argued that it would only benefit developers' profits whilst having a negative impact on health and wellbeing and causing overcrowding.
- Some respondents commented that smaller homes may be more attractive to young professionals who do not mind living in smaller homes but it should be through choice rather than a lack of alternative affordable accommodation. Respondents who supported the proposals commented that there was a need for this type of accommodation, it is a way to meet demand for new and affordable homes and that quality of accommodation can be achieved in other ways to just the size of units.
- Of those who said that Build to Rent schemes should be supported on specific types of site or in certain locations, the most popular suggestions were areas with good public transport accessibility, town centres and where rents are affordable.

- Other respondents argued that Build to Rent should be supported borough-wide to ensure a mix of housing and to meet the need for this type of housing where there is a demand. Some respondents suggested that Build to Rent properties should be owned and managed by the council to ensure their affordability.
- Just over half of respondents agreed that there should be a longer minimum period before Built to Rent properties can be sold. The most popular suggestion given was a minimum of 25 years.
- Many respondents agreed that Vauxhall does not need any more student housing and argued that Lambeth is not a university area and there is a greater need for conventional and affordable housing. However, some respondents acknowledged that did not know enough about Vauxhall or the demand for student housing to comment; 27% said they neither agreed nor disagreed and 15% said they did not know.
- The majority of respondents supported retaining the policy on protecting family homes from conversion. Respondents highlighted the importance of encouraging families to stay in Lambeth and raised a range of concerns about the negative impacts of conversions. However, some respondents acknowledged that the demand for family housing may change as families become smaller.
- Just over half of respondents said they neither agreed nor disagreed or didn't know when asked about meeting the need for Gypsy and Traveller accommodation on the existing site in Streatham Vale. Some respondents commented that they did not know enough about the topic and recommended that consultation is undertaken with Gypsies and Travellers. Some respondents questioned whether Gypsy and Traveller accommodation is appropriate for Lambeth.
- 96% of respondents strongly agreed or agreed with requiring the inclusion of more green infrastructure in new developments because of the positive impact of the environment, the local area, health and wellbeing, air quality, global warming and flood risk. Respondents suggested that green infrastructure could be provided more imaginatively than more traditional methods whilst some questioned who would be responsible for maintenance.
- Respondents provided a range of infrastructure types that should be planned for in the updated Infrastructure Delivery Plan, with the top two suggestions being parking and community spaces.

Affordable Housing

- Just over half of respondents agreed or strongly agreed with following the Mayor's threshold approach, although many argued that the target should be higher than 35%. Some respondents were concerned about it being a way of developers avoiding their obligations and wanted affordable housing to still be subject to viability testing.
- Developers were supportive of adopting the threshold approach, arguing that it would speed up the delivery of affordable homes. However, many respondents argued that many of the homes being delivered are not genuinely affordable.
- The majority of respondents agreed with increasing the threshold on former industrial sites, with the majority suggesting 50% as the preferred threshold.
- Respondents felt that there was a greater need for affordable housing compared to affordable workspace, although many acknowledged that it was difficult to get the balance right. Other respondents felt that both were equally important and it should be considered on a case by case basis.

- 74% of respondents strongly agreed or agreed that small sites should contribute to the provision of affordable housing. However, some felt that it would negatively impact on smaller developers who should be encouraged. Developers argued the council should follow the government's guidance and the approach could prevent schemes from coming forward.
- Securing more affordable housing for those on the lowest incomes even if it means getting less affordable housing overall was the most popular option. Many respondents felt that those on the lowest incomes are of the greatest need and there is a need to ensure that people do not need to move elsewhere. Others felt that those on middle incomes and key workers need more support.
- 40% of respondents strongly agreed or agreed that in housing estate regeneration schemes should accept less than 50% affordable housing overall to deliver a higher proportion of affordable housing at council rent. 35% strongly disagreed or disagreed and 21% neither agreed nor disagreed. Many respondents supported council or social housing, although many respondents who disagreed strongly objected to estate regeneration in general.
- Community Land Trusts, London Living Rent and Discount Market Rent/Affordable Rent were the most popular forms of intermediate housing. Many respondents considered Community Land Trusts to be genuinely affordable and a sustainable, long term solution.
- To support workers who provide essential services, many respondents suggested building more council or social housing. Others suggesting working with large employers of key workers to deliver their own affordable housing schemes.
- 70% of respondents strongly agreed or agreed that developers should provide social rented units in Build to Rent developments, particularly to provide mixed communities. Those who disagreed felt it would impact on the deliverability of schemes.
- The majority of respondents supported amending the Local Plan requirements for different sizes of affordable housing to reflect the evidence. Some respondents felt that the requirements should be flexible and reflect changing circumstances whilst others questioned the reliance on long-term projections.
- Almost half of respondents agreed or strongly agreed that developments of specialist student housing should provide affordable housing and suggested that student housing is very profitable. However, some questioned whether affordable housing would work alongside student housing.

Housing for Older People

- Respondents generally supported the provision of specialist retirement housing to encourage people to downsize but acknowledged that it may be difficult to achieve in practice as people are reluctant to leave their family homes and there are not enough suitable, smaller properties available.
- Half of respondents said that housing older people should be exempt from contributions to affordable housing but those who disagreed or strongly disagreed said that all developers will argue they can't afford to provide affordable housing which is important for mixed communities. The GLA pointed out the new draft London Plan considers some types of housing for older people should be making contributions to affordable housing.
- 73% of respondents supported semi-communal living as a way of reducing loneliness and isolation. Respondents suggested that the council should also look at a co-housing model and that semi-communal living should be designed sensitively as it would suit some people more than others.

- Some respondents suggested that people could continue to live independently if they are able to divide their existing homes into flats which they could then rent out to younger people for company or care.

Self-build and custom house building

- The majority of respondents agreed that plots for self-build and custom build house building should only be available to those with a local connection to Lambeth. Respondents argued it strengthens the community and provides an opportunity for people who genuinely want to stay in the borough rather than developers. Other respondents felt that the approach would discriminate against people outside of Lambeth and could potentially only require a connection to London.
- Small plots or awkward shaped plots of land, brownfield sites, land within estates, back gardens and garages, industrial sites and derelict land were each identified by at least three respondents as being most suitable for self-build and custom build housing in Lambeth.
- 59% percent of respondents felt that development of sites for self-build and custom build housing should only be allowed where this would make efficient use of the land. Respondents argued that land is a finite resource and there is no reason why self-build cannot be multi-storey. Respondents who disagreed argued that high density development may not be suitable for some plots, such some awkward and small size plots of land and variety should be encouraged.

Business and jobs

- Respondents generally agreed that Lambeth should secure supportive and affordable workspace from developers at less than market rents to encourage new businesses to grow and develop. Respondents felt that it would support start-up businesses and creative and cultural industries. Those who disagreed with securing affordable workspace argued that it would impact on the viability of developments and it should not be secured in perpetuity.
- Just over half of respondents felt that the council should target specific sites for the provision of affordable workspace, with the most popular suggestion being town centre sites. This was considered to be a sustainable option and would support the co-location of uses.
- A mixed response was received to requiring developers of new businesses space to work with specialist affordable workspace providers chosen by the council. Some respondents felt that it would provide better outcomes and suggested that businesses would be able to access expertise, investment opportunities and assistance. Others felt that it would limit innovation and competition. Developers suggested they may wish to work with their own preferred providers.
- 44% of respondents felt that affordable housing should be a greater priority than affordable workspace. Many respondents felt that housing should be the priority and others suggested that it should be considered on a case by case basis, reflecting the viability of a scheme.
- Developers argued that any financial contribution sought instead of replacement employment floorspace would need to be viability tested. Other respondents felt that it may be difficult to enforce and that developers should be required to provide what is being lost on-site.
- A wide range of view were voiced regarding the proposed Key Industrial Business Areas (KIBA) changes. Some respondents supported the changes whereas otherwise felt the no net KIBA land should be lost. Others thought there was potential to intensify employment uses in KIBAs by allowing mixed use redevelopment. There were varied views about the proposals about individual KIBA proposals, summarised in Tables 2 and 3.

Town centres

- Respondents generally supported proposals to limit the numbers of betting shops and pay-day loan shops and argued that these uses have a negative impact on the surrounding areas and the people who use them.
- A mixed response was received in relation to limiting A2 uses. Many respondents felt that there were too many estate agents in the borough but supported other A2 uses, such as banks and building societies, as being useful services.
- Respondents supported proposals to implement an Article 4 Direction to remove the permitted development right for change of use from A1 to A2. The most popular suggested was Streatham followed by Clapham.
- The majority of respondents supported adding to existing Local Plan policy to protect pubs. Respondents argued that they are a valuable resource for communities and add to the diversity of town centres and were under threat from residential development taking place nearby or above pubs. Some respondents highlighted the difficulty in testing the viability of a pub.
- Generally respondents felt that nightclubs make a positive contribution to the night time economy, although many respondents were concerned with issues such as noise, litter and anti-social behaviour. Many respondents who supported nightclubs did so on the basis of needing tighter controls on these uses and limiting them to certain locations, for example near to transport hubs and away from residential areas.
- A wide range of suggestions were provided as to how the Local Plan could support the delivery of a cultural programme. These included ensuring diversity, supporting existing and new venues and facilities, financial support and better communications.
- Respondents generally supported the proposed town centre boundary changes, although some respondents suggested further changes to West Norwood and Loughborough Junction. Respondents also argued the need to consider the impact of moving the local centre in Clapham Park on some groups of residents.
- Respondents highlighted a number of issues related to the boundary of Streatham town centre and its uses. These included the lack of identity, the retail offer and the dominance of Streatham High Road.

Hotels and visitor accommodation

- Over half of respondents agreed that short-term lets were a good way to meet demand for visitor accommodation in Lambeth alongside hotels. Respondents felt that this type of accommodation offers flexibility and are a good alternative to hotels. However, many respondents felt that short-term lets reduce the amount of accommodation available for rent and felt that they create a transient community.
- The majority of respondents supported prioritising other uses over hotels, citing the need for more housing in the borough. Respondents argued that there were already too many hotels in Lambeth, particularly in Waterloo. Respondents who disagreed argued that this approach would be a barrier to economic growth.
- 88% of respondents strongly agreed or agreed that planning applications should be required to assess their impact on residential amenity. Impacts included noise, traffic, pollution, parking, deliveries and the transient population. Particular issues were raised for Waterloo and Clapham and the impact on local residents.

- Just under half of respondents strongly agreed or agreed that new hotels should not be supported in Waterloo. Respondents argued there are number of issues in Waterloo, including the creation of a dormitory for tourists, the impact on Lower Marsh and loss of services for residents and the lack of benefit to the local economy. Developers argued that the need for hotels should be considered on a case by case basis and a blanket ban on new hotels in Waterloo would not be supported.
- Respondents highlighted a number of issues in relation to 'serviced apartments'. Some respondents argued there is a risk that serviced apartments may be used as permanent accommodation. Others felt there is a greater need for affordable housing over forms of visitor accommodation and serviced apartments may have a negative impact on the community, including the creation of a transient population.

Improving air quality

- Respondents raised significant concerns on the health implications of poor air quality, with suggestions that transport is a big contributor of poor air quality, followed by development and its construction.
- Respondents supported the requirement for air quality assessments as part of the planning application process. The most popular types of development were:
 - Developments with potential to significantly change road traffic on busy roads.
 - Developments where people will be exposed to poor air quality for significant periods of the day, particularly for developments located on busy roads, diesel railway lines or in generally congested areas.
 - Developments that introduce or increase car parking facilities by 100 spaces or more.
 - Developments for facilities used by people most sensitive to air pollution, for example schools or healthcare facilities.
- In terms of mitigation measures, respondents highlighted the importance of tree planting and urban greening to alleviate air pollution. Other measures suggested included improving conditions for walking, cycling and public transport journeys; discouraging car use and engine idling; promoting the use of electric vehicles; and providing charging points.
- Some respondents expressed strong concerns about the budget for air quality and would like to see spending on improving air quality increased, the implementation of the Clean Bus Corridor from Streatham High Road to Brixton Hill and a focus on bringing Lambeth's air pollution levels within legal EU limits by 2020.

Transport

- The majority of respondents strongly agreed or agreed that the overall objective should be to encourage more people to walk, cycle and use public transport rather than travel by car, arguing that car use has significant impacts on human health, quality of life, wellbeing and the environment. However, some respondents argued that car trips are necessary for some people and that public transport is not efficient or frequent enough in some parts of the borough.
- Respondents provided a range of suggestions as to how the council can encourage more people to walk and cycle. The most popular suggestions were better designed streets for pedestrians and cyclists, improved safety and reducing traffic.
- In order to reduce road danger in the borough, the majority of respondents felt that existing rules need to be enforced. This included enforcing speed limits, increasing the number of speed cameras, enforcement against illegal cycling and better enforcement of traffic rules more generally.

- 86% of respondents strongly agreed or agreed with the identified priorities for public transport in Lambeth, stating that the priorities could reduce air pollution, encourage cycling and walking, discourage car use and support a safer and more sustainable community.
- A range of other priorities were also identified. This included suggestions of improvements to bus and rail services and focusing on walking and cycling. Some respondents argued that public transport needs to be improved in Streatham, arguing for an extension of the tube and Crossrail 2.
- 77% of respondents strongly agreed or agreed that more priority should be given to buses and felt that dedicated bus lanes can lead to better bus traffic flow, less congestion and air pollution and will lead to a more attractive bus service. Many respondents argued that cycling and walking should be considered at the same time and that the prioritisation of buses should not have any impact on the safety or space allocation for these modes.
- Respondents who disagreed that buses should be given more priority argued that buses add to congestion levels and that there are already enough bus lanes in the borough. It was argued that buses should be better regulated, making more efficient use of bus lanes and minimising empty buses.
- The majority of respondents strongly agreed or agreed that measures should be considered to reduce overall traffic levels. Suggestions included converting local streets into one-way streets, enforcement of speed limits and installing bollards and speed bumps. Controlled Parking Zones were also suggested. However, respondents who disagreed felt that restricting traffic in local streets would move traffic to main roads, leading to additional congestion and air pollution.
- 88% of respondents strongly agreed or agreed that parking controls should be used to manage demand for parking and argued that parking spaces should be reduced to offer road space to other uses that would benefit the public. Suggestions included protected cycle routes and wider pavements for pedestrians. Controlled Parking Zones were suggested for a number of locations in the borough.
- Respondents who disagreed with parking controls argued that the needs of tradesmen, businesses and local shops should be considered and some activities require car parking, such as visiting health centres. Other respondents argued that the impact on low income families should also be considered.
- Just over half of respondents agreed or strongly agreed that new developments should be car free except for disabled parking. Respondents argued that car free developments discourage car ownership and a shift to alternative modes can reduce air pollution. It was also felt that car free developments would need to be accompanied by viable alternatives, such as adequate cycle parking and car clubs.
- Of the respondents who did not support car free developments, many argued that people need cars, particularly families and older people. Others suggested that this should not be implemented until public transport improvements have been made. It was also argued that car free developments will have an impact on surrounding areas, increasing the stress of parking demand and reducing availability for existing residents.
- The majority of respondents agreed or strongly agreed that alternative uses of the kerbside should be prioritised. The most popular suggestions were cycle parking and car club bays. However, some respondents were not in favour of electric vehicles and argued that they still add to congestion levels and increase parking demand.

Waste

- The majority of respondents supported collaborating on waste issues with the other waste planning authorities, as long as the level of services for householders does not decline.

- Many respondents were concerned that if waste capacity was re-provided outside the borough it would lead to a greater carbon footprint and congestion. There was also a recognition that communities should take responsibility for their own waste.
- Many respondents didn't feel there was enough information on whether identifying KIBAs as suitable for waste use is the right approach.

Places and Neighbourhoods

- The Waterloo Business Improvement District and the South Bank and Waterloo Neighbours Neighbourhood Forum stated they would like to see the policies in the South Bank and Waterloo neighbourhood plan reflected in the Local Plan.
- A large number of respondents raised concerns about a number of issues in Brixton, particularly focussed on the perceived impact of the night-time economy. Suggestions included reinstating the noise abatement out of hours service, amending the town centre boundaries and creating a saturation zone to limit the number of bars.
- Norwood Planning Assembly would like to see more alignment between the work of the neighbourhood plan and the Local Plan.
- The Kennington, Vauxhall and Oval Neighbourhood Forum raised a number of comments including the need for transparency of viability information, the need to review the local views policy and the current interpretation of the tall buildings policy.
- Herne Hill Forum expressed concern about the number of betting shops in the area and the lack of some types of A2 uses, particularly banks and building societies.
- Loughborough Junction Action Group would like to see the town centre extended to LJ works but don't wish to see a 'disturbing' night-time economy develop in the town centre. They would also like to see the council work with Southwark to extend the 'low line' to Loughborough Junction.
- Crystal Palace and Upper Norwood Forum raised concerns over the lack of co-ordination between boroughs of the issues facing the area, particularly transport and parking.
- Respondents argued that Streatham's current retail offer needs to be improved, the centre lacks an identity and the High Road is not conducive to a successful town centre.

General comments

- Historic England argued that the Local Plan Review should take account of changes in the draft new NPPF and the draft new London Plan, particularly the changes to the tall buildings policies in the draft new London Plan. They suggested that the completion of the management plan for the Westminster World Heritage Site will assist in ensuring a sound policy.
- The Environment Agency provided comments on flood risk, contaminated land, water resources and quality and biodiversity and would like to see the Local Plan Review aligning with the Thames Estuary Plan.

Sustainability Appraisal

- Respondents welcomed the Sustainability Appraisal. However, one respondent questioned whether the impact on existing residents through changes to Key Industrial Business Areas had been considered through the Sustainability Appraisal. Others questioned the SA Framework and whether the reasonable alternatives proposed should consider estate regeneration.

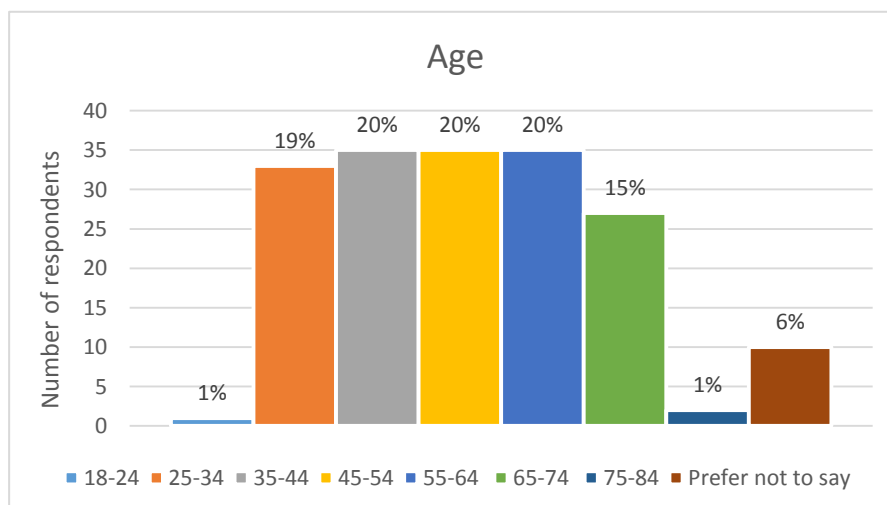
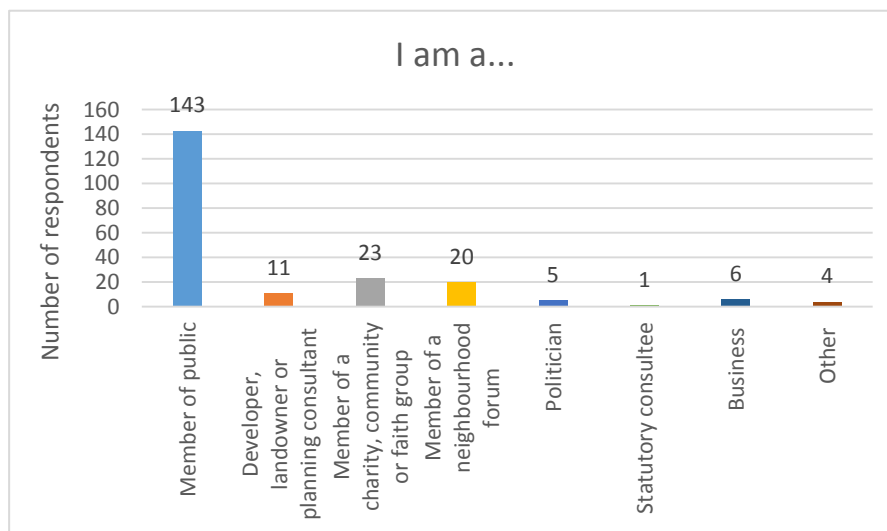
- Historic England would have liked to have seen the Scoping Report published alongside the Sustainability Appraisal.

3.4. Housing growth and infrastructure

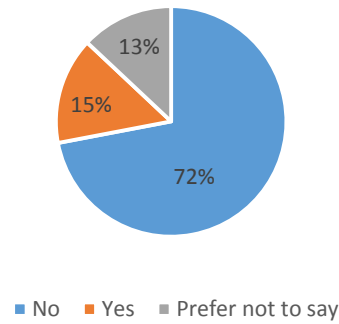
In response to the 'Housing Growth and Infrastructure' survey, 178 survey responses were received. A total of 17 written responses, including statutory consultees, was received.

Survey responses

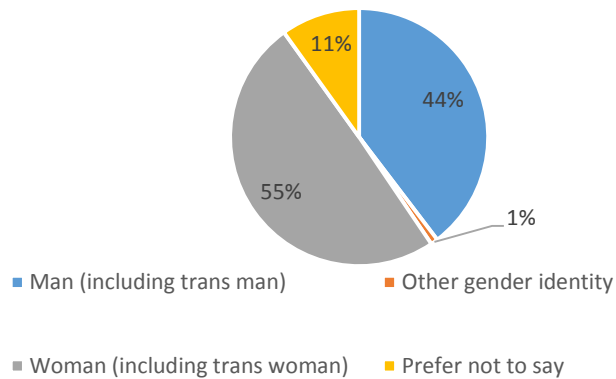
- The majority of responses for the Housing Growth and Infrastructure survey identified as being a member of the public. The second largest group were members of a charity, community or faith group followed by members of a neighbourhood forum. 11 respondents identified as being a developer, landowner or planning consultant. A smaller number of responses were received from people who identified as being a politician, business or statutory consultee. Of those who identified as being 'other', three responses were from residents of Lambeth and one from Vauxhall Business Improvement District. It should be noted that some respondents identify as being from more than one category.
- 19% of respondents were between the age of 25-34 and two thirds were aged between 35-74 years. Only 1% of respondents were aged between 18-24 years.
- The majority of respondents (72%) did not have a disability or live with someone who had a disability.
- 55% of respondents identified as being a woman and 44% identified as being a man. 11% preferred not to say.
- The majority of respondents White: British. The second largest group identified as being Other White background. One respondent identified as being White: Gypsy or Irish Traveller.



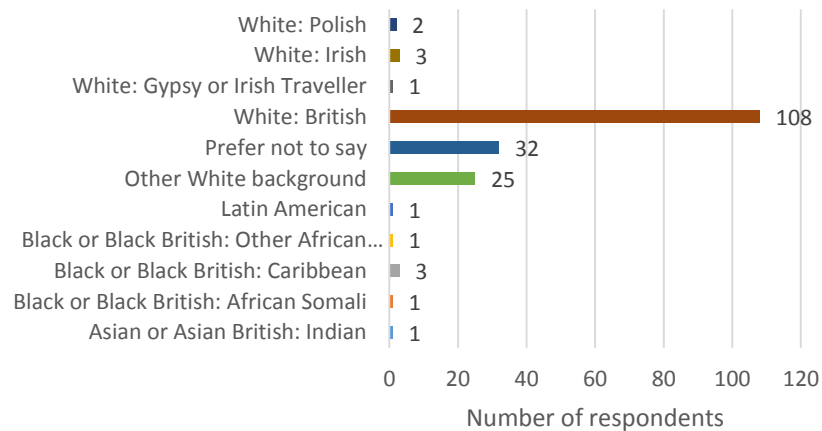
Do you, or anyone with you, have a disability?



Gender



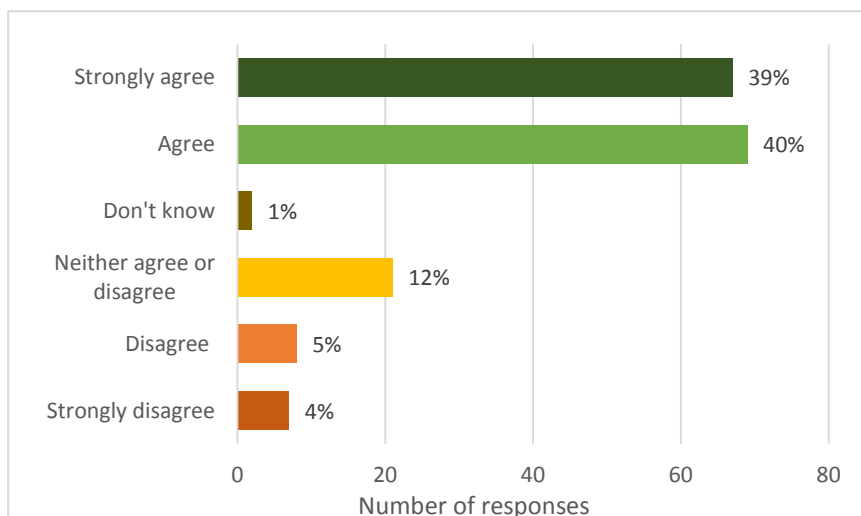
Ethnicity



1. To help increase the overall amount of new housing that can be built in Lambeth, we could release a limited amount of industrial land to allow for mixed use development that includes new housing and new workspace for small businesses. To what extent do you agree or disagree with this approach?

Survey responses

174 responses to the question were received. The majority of respondents strongly agreed or agreed with a limited release of industrial land for mixed use developments (79%). 12% said they neither agreed nor disagreed and 1% said they didn't know. 9% either disagreed or strongly disagreed.



Of those who strongly agreed or agreed, five respondents said that the release of industrial land for housing and the use of brownfield sites was preferable to developing on green spaces in the borough whilst one respondent said it was preferable to knocking down existing housing estates. Four respondents supported the idea as they believe that Lambeth is not an industrial area and preferred housing and small businesses to industrial land that is unsightly, noisy and pollutant.

Eight respondents agreed with releasing industrial land for housing but set out their requirements for what developments in these areas should include. The suggestions included:

- Ensuring that the developments are car free except car clubs to maximise space available for businesses;
- Providing space for small businesses to help people running small and artisan businesses;
- Ensuring that developments take account of the availability of public transport and have lots of green spaces, including trees;
- Providing accessible homes and workspaces for disabled people;
- Providing recreational, shopping and office uses;
- Providing flexible workspace that has been designed to be managed by operators; and
- Creating new open spaces if the areas do not meet the targets for open space provision.

Four respondents supported the release of industrial land but only as long there is not a negative impact on surrounding areas and that the design and densities of the developments reflect the character of the surrounding area. Similarly, four respondents support the idea if genuinely affordable housing is provided at social or affordable rent and these sites are not used to provide more luxury housing.

Three respondents agreed with the approach but commented that it was important to assess what will happen to the people who will lose out from having less local jobs or there is a risk that Lambeth will become a dormitory for central London.

One respondent commented that the majority of the West Norwood Key Industrial Business Area has been derelict since the Technical College was demolished and since then housing development on this site has been blocked. They suggested that releasing this site for a mixed use scheme with ground floor uses such as garages and/or workshops would make a significant contribution to housing. Other respondents offered other sites that could be released for housing which included:

- Industrial land not being used effectively such as railway arches and sidings.
- Key Industrial Business Areas and other employment sites that have been reviewed in accordance with the NPPF.
- Industrial land in Vassall and Coldharbour should be released for new workspace for new businesses.
- Pockets of waste land that have been left idle for many years.
- Knollys Road which would make more sense than industrial land.

Other respondents supported the proposals as they see it as a way of maximising revenues for the council, the housing crisis is greater than the unemployment problem and the approach is being taken elsewhere (e.g. in Southwark) as a means of capitalising on improvements in accessibility to meet growing housing and employment needs. Another respondent argued that there is no economic reason for having different land use categories.

Of those who neither agreed nor disagreed, six respondents said they need further detail on how this would work in practice in order to be able to offer a comment and that it depends on the type of industrial land or area proposed to be released. One respondent said there is no mention of increased social housing whilst another argued that a balance of industrial space is required in order to provide local jobs for local people. Another respondent suggested that a viability study should take place to establish the amount of industrial land that could be used for housing rather than demolishing people's homes.

Of the respondents who disagreed or strongly disagreed, five respondents didn't support the release of industrial land as the retention of industrial land is important for local jobs and space for local businesses. Three of these respondents said that smaller businesses tend to only employ a smaller number of people, converting industrial land to mixed use with offices and housing does not provide the diversity of jobs that industrial land can offer and that for many small businesses operating from industrial areas, when they are being forced out or priced out of their premises, this will mean the end of their businesses and a loss of jobs.

One respondent argued that this approach will not solve the problem of infrastructure being able to cope whilst another argued that Lambeth is already overcrowded and that more tower blocks will only add to the problem.

Written responses

SP Planning, on behalf of Lexadon Properties, supported the release of industrial land to allow for mixed residential/employment development. DP9, on behalf of ITV Plc, also support opportunities for the release of land for housing. Although it was acknowledged that the total loss of industrial land cannot be supported, some sites may be suitable for intensification and the co-location of activities. The developer argued that co-location would protect the future needs of the industrial uses, increase economic opportunities and contribute to Lambeth's housing targets.

NJL Consulting, on behalf of Cashco, argued that it is not appropriate to seek the protection of industrial land that will not be used for that purpose, in accordance with paragraph 22 of the National Planning Policy Framework (NPPF). The approach identified is likely to ensure that sites identified for industrial use which have struggled to come forward in the past can be delivered with a mix of uses to meet the housing and employment needs of the local area. A further benefit could be the release of industrial sites to provide mixed-use schemes that are more in keeping with the surrounding uses and are sympathetic to the amenity of adjacent occupiers. The developer argued that the redevelopment of each site, and its potential to provide a mixed-use development, should be considered on a case by case basis and should not be restricted by the need to provide viability or marketing evidence.

On the other hand, Brixton Society does not support any further loss of employment floor space in the Brixton area and argued that the Local Plan should provide more guidance on how residential and employment uses can co-exist without environmental problems for residents or undue restrictions on businesses.

Statutory consultees

Wandsworth Council stated they strongly agreed with the approach, subject to Lambeth's evidence based on the demand and supply for industrial land and the draft London Plan. Wandsworth recommended robust testing of suitable locations to be released for mixed use development and ensuring that the industrial function of the site is not negatively affected by allowing residential onto the site. They also requested close working to ensure there is no detrimental effect from the loss of any land released to the wider area, given that Wandsworth is in the same Functional Economic Market Area as Lambeth.

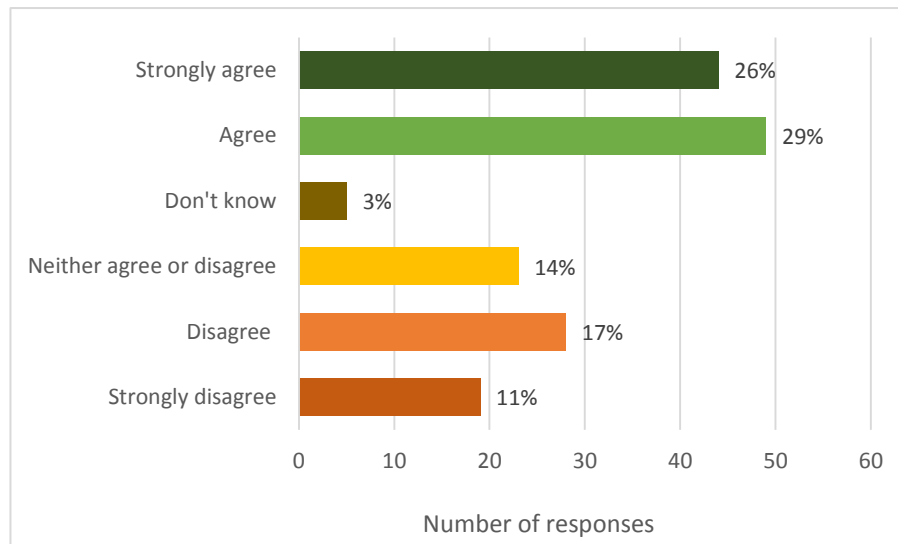
TfL Commercial Development set out that the Mayor's approach to maintaining a sufficient supply of land and premises to meet current and future demands for industrial and related functions is set out in Chapter 6 of the Draft London Plan. TfL argued that Lambeth is required to 'retain capacity' and there should be no overall net loss of industrial floor space capacity, including operational yard space, within SIL and LSIS but there may be circumstances in which a release of industrial land can be justified. They recommend that this is facilitated through the processes of industrial intensification, co-location and substitution as set out in Policy E7 of the Draft London Plan, in order to enable additional housing provision as part of mixed-use schemes. Lambeth's employment policies should also reflect the clarification in the draft London plan which states that 'the principle of no net loss of employment floor space capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required'.

The GLA, on behalf of the Mayor, stated that the new draft London Plan promotes the intensification of industrial activities and where appropriate, co-location with residential development. Due to the much greater release of industrial land than that stipulated in the London Plan monitoring benchmarks, the draft new London Plan takes a more restrictive approach to the loss of designated industrial areas. Lambeth is categorised as a borough that is required to retain its industrial capacity.

2. The density of development that is appropriate in different locations depends on the setting. The new London Plan is expected to encourage higher density developments including more new housing in town centres and locations with good public transport accessibility. To what extent do you support higher density developments including more new housing in town centres and locations with good public transport accessibility?

Survey responses

168 responses to the question were received. Just over half of the respondent strongly agreed or agreed with higher density developments in town centres and locations with good public transport accessibility (55%). 35% respondents disagreed or strongly disagreed and 14% said they neither agreed nor disagreed. The remaining 3% didn't know.



Respondents who strongly agreed or agreed with high density developments supported this type of development for a number of reasons including:

- Helps to limit urban sprawl and car usage.
- Increases opportunities for smaller retailers in town centres who are competing with shopping centres.
- Development around transport hubs will increase supply of housing without negatively impacting on an area's wider character.

Four respondents who agreed or strongly agreed with high density developments commented that these types of development should only be supported if they are providing social or affordable housing, with one respondent arguing that these developments should guarantee 40% affordable housing. Six respondents supported high density developments as long there is capacity on the public transport network, particularly taking account of the high pressure on the Northern line, and proper transport assessments are undertaken. Other caveats included:

- Providing town centre shops so people can shop locally to reduce car use.
- Not relying on tall towers but using low to medium high rise densities to retain the character and identity of places.
- Ensuring that disabled people can navigate developments safely and that affordable community spaces are provided to help communities come together to celebrate and meet each other.
- Protecting surrounding areas under conversion stress and existing retail or public facilities.
- Ensuring that new housing is located in areas with good social infrastructure.
- Ensuring that environmental safeguards are put in place, such as control on air pollution and noise pollution.
- Developments are well built and have due regard to fire safety.
- Developments do not include the demolition of existing estates.

Some respondents commented that town centres and areas with good transport accessibility are not the only location where high density housing can be supported. Suggestions of other locations included:

- Supporting high density housing across the borough.
- Actively encouraging the redevelopment of two storey housing or commercial properties within 500m of transport hubs.
- Using a design-led approach to increasing densities and optimising the use of sites.
- In locations where the quality of development is not compromised and high quality residential is provided, for example where development is located next to large areas of open space.
- The West Norwood Key Industrial Business Area and the triangle between the railway lines.

Of those who neither agreed nor disagreed, respondents said that transport infrastructure is needed to support new development, particularly in Streatham. One respondent said that there is a danger of increasing density but reducing public open space is bad for health and wellbeing whilst another said that it depends on the location and the impact on the immediate neighbourhood.

Fifteen respondents who disagreed or strongly disagreed with higher density developments commented on the impact of these developments on the borough and the quality of life for occupants. Many said that Lambeth is already overcrowded. Objections to high density developments included:

- Increase in stress, noise, traffic and air pollution
- Lack of light and open space in new developments
- Harm to highway and pedestrian safety
- Pressure on services and infrastructure
- Creation of transient communities
- Deterioration of the character of the area
- Lack of social housing in developments

Six respondents argued that some areas don't have good enough public transport to support higher density developments. For example, one respondent commented that accessibility to public transport doesn't mean availability of public transport and said that Tulse Hill has various train lines but they are full during peak times. Other respondents said that transport provision is patchy in the south of the borough, particularly in Streatham which has also lost out to Crossrail 2.

A couple of respondents said that high density development can be good but can also be poor quality or lead to buildings clustered around transport stations that have not considered the impact on the locality. Another respondent said that high density development needs to be weighed up against the quality of living, considering the equality and environmental impacts.

Other respondents who objected to high density developments commented that small flats are not good for families, there is a need to balance housing with employment opportunities and that the council should encourage more housing over existing retail outlets. Comments also questioned whether town centres are the most appropriate places for high density and whether we need buildings over 4-5 storeys given that there are plenty of empty homes in Lambeth.

Written responses

SP Planning, on behalf of Lexadon Properties, supported high density developments in town centres and areas of good public transport accessibility. The developer argued that in order to achieve the higher densities, there is a need to revise amenity space provision requirements in Policy H5 which is impossible to achieve in town centre and high density locations where there is a need to re-provide commercial uses on the ground floor. The developer also argued that any new policy related to density should reflect the difference in character and development density between the north and south of the borough and should also take account of access to local parks and the likely composition of future residents of new developments.

DP9, on behalf of ITV Plc, commented that the density targets in the London Plan should not be applied mechanistically and that higher density developments should be supported in many instances to help meet housing targets set out in the current and emerging London Plan. NJL Consulting, on behalf of Cashco, also provided this argument and commented that the density of proposed developments should be reflective of surrounding land uses, accessibility of the site and should be assessed on a site by site basis or increased within identified zones or areas of the borough.

RPS CgMS submitted comments on behalf of UDN Properties Limited and stated that draft London Plan policy D6 sets out a site by site design-led approach to be taken to assessing capacity. They argue that adopting a flexible approach to enforcing minimum standards for new dwellings is pragmatic and will help to increase housing delivery and that there are many sites that could accommodate housing growth in this way and would benefit from increased density measures.

Indigo Planning on behalf of St Clair Developments, strongly supported an increase in densities in town centres and locations with good public transport accessibility as the efficient use of land and intensification of development is essential to meeting growing housing needs.

The Brixton Society argued that high density developments is already contributing to overcrowded public spaces around transport hubs and that current policies are encouraging an oppressive environment dominated by tall or bulky buildings. The Society would not like to see the Vauxhall high-density model being rolled out across the rest of the borough and encourage the council to resist developments which produce excessive local densities. Account should also be taken of the available carrying capacity of existing public transport as there are some key routes that already have no additional capacity to transport new residents to Central London, including the Northern line between Clapham South and Stockwell and all bus routes down Brixton Hill between the South Circular Road and Brixton.

Statutory consultees

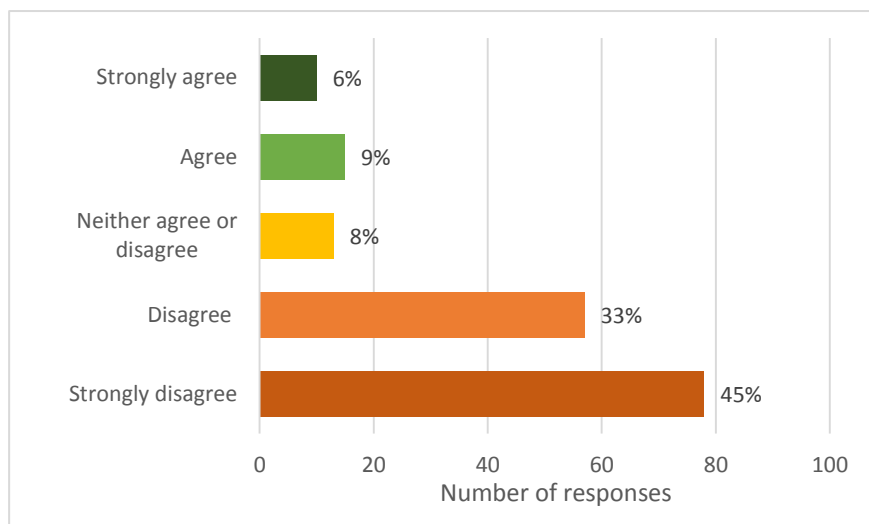
Network Rail welcomed the Mayor's intent through the draft London Plan to meet much of the city's growth demands within London through higher density developments, which are situated in highly accessible locations, well served by existing or planned transport interchanges. Network Rail argued that all stations in London provide an opportunity for sustainable development, including residential intensification, providing Lambeth residents with a clear opportunity to live close to public transport nodes but set out there are a number of stations in Lambeth where significant development can take place to create the homes that are needed and providing the significant funding required to contribute to the expansion of the rail network. Network Rail identified Waterloo, Vauxhall, Brixton, Streatham and Clapham as priority locations with opportunities for major high density development and station improvements. However, Network Rail stated that public funding can no longer be relied upon and that there is a need to increasingly source funding from those people, authorities and businesses that directly benefit from better railways. Policies in relation to the delivery of housing, creation of employment, unlocking the potential of public land and the optimisation of strategic development opportunities at key transport nodes will be vital to Lambeth's growth and the success of a new Lambeth Plan.

High-density, mixed use developments at and around stations, other transport hubs and in and near town centres and in other locations which are well-connected by public transport, walking and cycling is also supported by TfL Commercial Development who state it is critical to planning for London's sustainable growth. They set out that Mayor advocates a design-led approach to achieving high densities, which would need to be addressed in the Local Plan.

3. We should sometimes relax the requirement for private gardens and balconies in new blocks of flats to enable more housing to be provided. To what extent do you agree or disagree with this statement?

Survey responses

Of the 173 responses to the question, the majority of respondents strongly disagreed or disagreed with relaxing the requirement for private gardens and balconies to enable more housing, with 45% strongly disagreeing and 33% disagreeing. Only 6% of respondents strongly agreed with relaxing requirement and 9% agreed. 8% said they neither agreed nor disagreed.



Of the those who strongly agreed or agreed, two respondents suggested that balconies and private gardens are only one way of providing open space and that there are benefits of providing housing that has easy access to large green spaces are well established. The responses suggested it could be possible to have shared communal roof top gardens or other forms of green infrastructure that could provide access to open space in lieu of private gardens. Two of the comments outlined that if the requirements are relaxed, it is essential that access to other well-maintained parks and green spaces is essential and that these spaces shouldn't be used for festivals as this can limit access.

One respondent suggested that people are able to see whether there is a balcony or not before they live there and will be better at judging their needs than the council who should be protecting residents from issues such as fire or asbestos. Similarly, three respondents commented that certain urban locations require denser developments which attract a specific type of occupier who won't always require their own garden or balcony and relaxing the requirements could allow for more housing. The comments suggested that in these circumstances it can be difficult to provide private amenity space, for example in conversions or town centres, and the occupants may prefer cheaper housing without private amenity space that could be provided in the form of well-designed and accessible communal or public amenity space.

One respondent supported relaxing requirements as more social and affordable housing is needed whilst another suggested that if designed to be in keeping with the general pattern of development in the surrounding area, there would be no significant detrimental impact upon residential and visual amenities of the local area or upon neighbouring occupiers. Whilst one respondent supported relaxing the current requirements, they said that outdoor drying space is essential to minimise the requirement for people on local incomes to pay for heating to dry their clothes.

Of those who strongly disagreed or disagreed to relaxing the requirements for balconies or private gardens, 21 respondents made comments relating to health, wellbeing and quality of life. The main issues raised in relation to health, wellbeing and quality of life included:

- Outdoor space is vital for enjoyable high density living.
- Outdoor space is important for mental health and relaxation – evidence exists that green spaces can be used to manage conditions such as depression.
- The proposals will result in higher health costs in the longer term.
- Outdoor spaces provide connection with the outside world and space to experience wind, space and light.
- Without outdoor space, the flats will be purchased by investors rather than people who want to live there.
- Green spaces are important as the size of homes decreases.
- Poorer people will be the most affected.
- New housing shouldn't mean a reduction in the quality of life.
- Developments will not provide opportunities for people to grow their own food.
- Relatively speaking, private gardens and balconies don't take up much room but provide necessary space for children and social gatherings.

14 respondents raised concerns over the quality of the environment and the impact on existing open spaces. Two of the comments said that green space is essential to a good environment whilst another argued that the council should not reduce the amount of amenity space provided in the Mayor's design standards to give everyone a balcony and that private gardens can contribute to the overall greening of an area.

A further 12 comments argued that access to existing gardens and green spaces is also neglected by the council and these things are vital to what makes an area good or not and can reduce people's quality of life and create a concrete and unpleasant environment. One of these comments argued that green space has already been severely reduced by paved front gardens and large offices or sheds in back gardens. Some comments argued that outdoor spaces are important for all and should come with responsibility to the owner go make sure it is well maintained whilst an increasing population without providing more parks and private gardens will make the strain on existing open spaces worse in terms of rubbish, noise and anti-social behaviour.

Some of the respondents who disagreed or strongly disagreed offered alternatives to balconies or private gardens. One comment argued that there is a diminishing number of public green spaces in poorly served areas and so the council needs to be more creative with solutions, including green roofs, solar panels and smaller balconies. Others suggested front gardens, roof top gardens and allotments or allowing residents to extend their properties to allow growing families to remain in their neighbourhoods rather than building housing in existing gardens. One respondent suggested that privately owned green spaces should be made publically accessible to benefit the community at large whilst another suggested that instead of a private garden, there could be a community garden where kids, young people and elderly people can relax. One further suggestion was for winter gardens or more generous living spaces where gardens or balconies are not feasible.

Eight respondents commented that green spaces are essential for air quality whilst another questioned what would absorb flash flooding if there were no gardens.

Other respondents who strongly disagreed or disagreed with relaxing the requirements made more general comments. One comment argued that people need balconies to hang wet clothing and that changing the requirements may cause anti-social behaviour as people will have to entertain elsewhere that will annoy neighbours whilst one comment suggested that not everyone is rich enough to go to cafes, restaurants and gyms for recreation so it is essential that people have access to outdoor space. Another comment suggested that some people will want to pay extra for garden areas compared to one respondent who suggested that it was much better to provide balconies in developments as gardens are often neglected or under-used compared to gardens. Another argued that we risk creating a bleak high rise dystopian vision that we may have to pull down in 20 years whilst one respondent provided said there were major problems in Vasall and Coldharbour with overlooking so recreational spaces are important.

Of those who neither agreed nor disagreed, two responses suggested that it depends on the individual scheme and whether there is already accessibility to existing high quality community infrastructure or whether there is already poor quality green space provision. If there is poor quality green space provision in an area, the comments suggested that green space should be provided in some way. One respondent commented that even a small balcony can make a difference to people whilst another commented that requirements for private gardens as opposed to maintained communal spaces is odd, but balconies are well liked.

Written comments

DP9, on behalf of ITV Plc, argued that the requirement for private gardens and balconies should be relaxed in highly constrained areas where these would compromise the overall design integrity of the building or where sites are adjacent to areas of green space which can provide higher quality amenity space than on-site provision. NJL Consulting, on behalf of Cashco, argued that the inclusion of communal open space or the enhancement of existing nearby open space can also be for the enjoyment of residents and can have a wider benefit on the existing residential population. The developer argued that flexibility in the provision of private amenity space may allow for more developments to come forward.

RPS CgMS submitted comments on behalf of UDN Properties Limited and stated that they are keen to see the Council adapt policy in a reasonable manner to accommodate the growth in its housing target. They strongly agreed with increasing density in appropriate locations, sometimes relaxing the requirement for private gardens and balconies (and community amenity space / children's playspace in appropriate locations) in blocks of flats to enable more housing to be provided.

Indigo Planning on behalf of St Clair Developments, strongly supported the relaxation of requirements for private gardens and balconies. Requirements should provide relief for sites with irregular configurations, physical constraints and challenging adjacencies. They argued that more flexible standards would help to provide a greater amount of functional residential floorspace, improved residential layouts and would help to avoid deleterious sunlight/daylight amenity resulting from the obligation to provide balconies.

The Brixton Society argued that existing outdoor space requirements should be maintained and that more effort should be made to encourage provision of balconies and roof terraces for apartments above shops or in converted properties, subject to respecting the privacy of neighbours. Adopting clearer guidelines on overlooking distances and angles would reduce conflict and privacy issues.

Statutory consultees

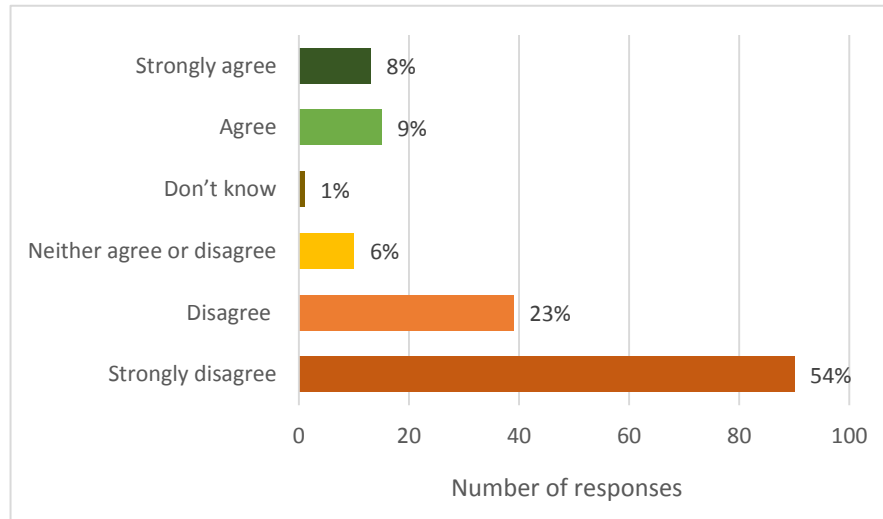
Wandsworth Council stated that it depends on the location of the flats, access to open space and green infrastructure and the densities of the development. If the impact will not be on the detriment of the development, they argue that the relaxation of the requirements could be acceptable.

The GLA, on behalf of the Mayor of London, commented that emerging Policy D4 Housing quality and standards in the draft new London Plan sets out how to optimise development on sites and ensure that new homes have adequately sized rooms, that are fit for purpose and meet minimum standards outlined in the policy. This includes private outside amenity space such as balconies. Table 3.1 sets out minimum space standards for new dwellings.

4. Some developers want to build blocks with very small flats or rooms with shared living spaces, much smaller than the current minimum standards for the size of new housing. They argue this is a way to increase the number of new, more affordable homes for younger people. To what extent do you agree or disagree with this point of view?

Survey responses

The majority of respondents strongly disagreed or disagreed that building blocks with very small flats or rooms with shared living spaces is a way to increase the number of new, more affordable homes for young people (77%). Only 17% strongly agreed or agreed.



Of those who strongly agreed or agreed that building flats smaller than the current minimum space standards or providing rooms with shared living spaces is a way to increase the number of new and affordable homes for younger people, four respondents commented that it was dependent on whether they were well designed or designed as lifetime homes. They argued that the minimum standards could be reduced to a certain degree as long as there was a strong overview from the council in order to prevent developers from creating poor living conditions. Another respondent commented that the amount of space available is not the sole factor in high quality accommodation which can include a well-designed layout, access to open space, daylight and sunlight, affordability and location so where the quality of homes can be demonstrated, smaller units should be supported.

Eight respondents provided comments related to the need for this type of products, stating that they would provide much needed housing that would support an increased choice of lifestyle and may be more affordable. One of these respondents commented that there is evidence that people soon get used to living in a small home and people can make their own choice of whether they would prefer to live in a smaller home or live with their parents. Another comment, made by a developer, stated that some smaller units should be supported in the right locations as part of a balanced development solution to deliver affordable housing that younger people want to live in but may not be able to afford. One respondent gave an example of Springboard Urban in West Hampstead and Fulham as examples of shared accommodation working well which promoted a good sense of community whilst two other comments argued there is strong demand for serviced accommodation and co-living for young professionals and key workers and these types of development are a good way of meeting the demand.

Two respondents supported this type of development but commented that it should be communally managed with resident involvement or with a co-operative of owners and should be at genuinely affordable rents.

Of the respondents who neither agreed nor disagreed, two commented that this type of property should only be actually affordable or social housing. One respondent considered that this would work on sites that might not be developed otherwise whilst another stated that it could work if cleverly designed by good architects but there is no point in achieving higher housing numbers if smaller homes means people need other homes for storage.

One respondent commented that these developments would inevitably take the form of HMOs and doesn't solve the issue of affordability for first time buyers as this type of accommodation may appear to some but not necessarily through choice if the other choice is to leave London. Another respondent said these types of development need strict controls but young people at the start of their careers may be happy to sacrifice some of their personal living space in the interest of having a good quality home.

13 respondents who strongly disagreed or disagreed with new housing smaller than the minimum space standards argued that this would have a negative impact on young people in the borough. They argued that it may be suitable for younger people in the first instance but will quickly become unsuitable when people get married and want to start families and will not be able to find suitable, affordable accommodation. The respondents also argued that this type of accommodation would lead to more transient populations as families outgrow the accommodation and move on.

Ten respondents commented that this type of development would only benefit developers who would sell the properties of a lower standard but for the same price. Overall, these respondents see this type of development as a way of increasing developers' profits whilst reducing the quality of accommodation in Lambeth.

19 respondents raised concerns around the quality of this type of development and the impact this could have on future occupants. Concerns included:

- Why should people with limited means be required to live in cramped conditions?
- The UK already has some of the smallest spaces standards in the developed world.
- People are not battery hens or sardines and should have a decent amount of living space to avoid overcrowding.
- Storage space is important.
- Good space standards are important for health and wellbeing, particularly mental health.
- Potential to create slum housing of the future.

One respondent commented that communal living space is not a terrible idea as long as it doesn't mean university halls style buildings whilst another respondent argued that this type of living is not affordable and gave an example of the Collective in Old Oak Common which is £200p/w plus bills for a shared kitchenette, private bathroom and communal sitting room. Other comments argued that there should always be minimum standards and that this approach is not necessary as there is plenty of land and old buildings in London. Another respondent commented that there could be flexibility for communal spaces but bedrooms should still be 12sqm.

Written responses

The standards in the Mayor's Housing SPD and the nationally-determined space standards are supported by the Brixton Society, although there could be flexibility in room sizes for conversions due to structural constraints. The Brixton Society do not support Pocket Living, Starter Homes or apart-hotels.

NJL Consulting, on behalf of Cashco, argued that the size of units does not always result in poor quality residential spaces nor adversely impact on residential amenity and supports the provision of a range of housing types and sizes in Lambeth.

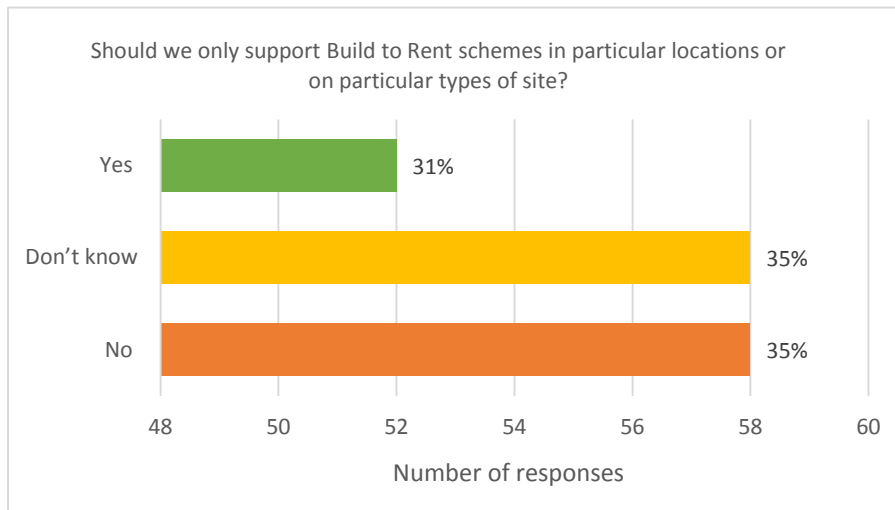
Statutory consultees

Wandsworth Council argued that minimum standards should be complied with regardless of affordability as these have been set by the Mayor as acceptable minimum space sizes for living in London.

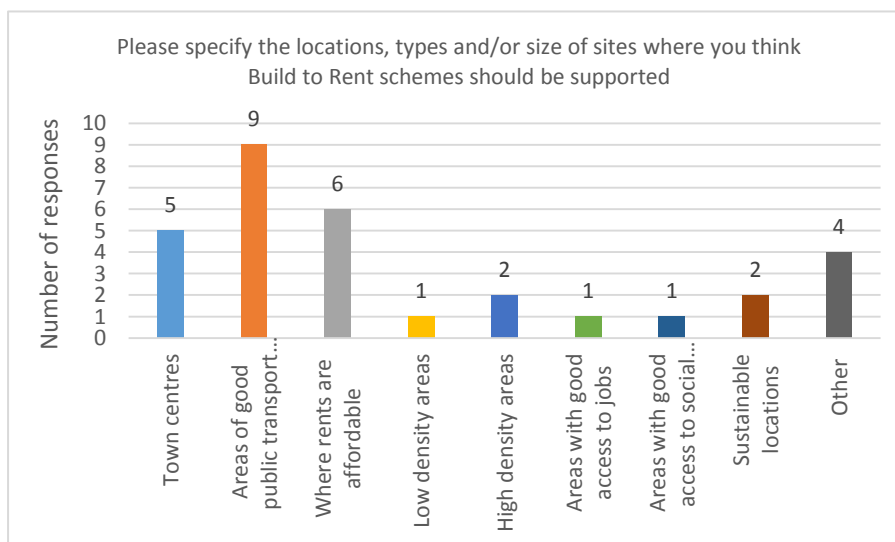
5. In the new Lambeth Local Plan, we could support the principle of Build to Rent development borough-wide or it could develop policy to direct Build to Rent schemes to particular locations or types of site. This might include town centres, opportunity areas and/or areas with higher public transport accessibility, on the basis that Build to Rent accommodation is high density and would be most appropriate in these locations. It could also include sites above a certain size. Should we only support Build to Rent schemes in particular locations or on particular types of site? If yes, please specify the locations, types and/or size of sites where you think Build to Rent schemes should be supported.

Survey responses

Of the 168 responses to the question, 35% did not think we should be only supporting Build to Rent in particular locations or on particular types of site. 35% also said they didn't know whilst 31% thought that we should.



Of the 31% who said that we should only be supporting Build to Rent on certain types of site or in certain locations, 31 people provided suggestions. The most popular locations were in areas of good public transport accessibility followed by town centres. Six people suggested that these schemes should only be supported if the rents are affordable.



The other suggestions made include:

- Allowing developers to choose as they are better judge of the homes people want.
- Ensuring the policy is flexible and takes account of viability considerations.
- Supporting Build to Rent outside of the main business district.
- Supporting Build to Rent in the Outer Hebrides.

Of the 35% respondents who responded 'no' to only supporting Build to Rent on certain types of site or in certain locations, seven respondents commented that there should be a mix of housing. The comments argued that there should not be a blanket policy of only supporting one type of housing, there is a danger of creating a mono-culture and there should be a mixture of development types throughout the borough. Three of these comments said that communities need to be mixed to avoid creating ghettos.

A large number of the comments supported Build to Rent borough-wide, particularly where there is demand. It was suggested that people should be able to choose where they want to rent a property, the schemes could reinvigorate more remote areas or that if areas are not treated equally then it could result in a post code lottery for types of housing. Others supported Build to Rent in principle so long as it resulted in decent long term tenancies with fixed rent.

Six respondents provided comments related to affordability and ownership. The respondents suggested that it would make more sense if Build to Rent properties were owned by the council and made available as social rent rather than private rent.

Other respondents criticised private rental properties, commenting that they offer no protection for private rental tenants, result in a transient population and will lead to overdevelopment by greedy developers.

Written responses

Brixton Society are of the opinion that the only obstacle to Build to Rent has been the long-standing indecision of central government who have preferred to promote owner-occupation. The Brixton Society advised that any policy should assume the return of Build to Rent as a form of development across the borough but should not accept high densities or lower standards for this form of tenure.

NJL Consulting, on behalf of Cashco, commented that Build to Rent schemes should be considered on a site by site basis rather than restricting schemes to particular locations that do not reflect their needs or abilities of developers.

CBRE, on behalf of Royal London Mutual Insurance Society Limited, commented that Build to Rent provides an alternative tenure to conventional housing and affordable housing models. This can provide a wider range of choice to residents and should be encouraged within Lambeth. The minimum period should be considered on a site by site basis.

Statutory consultees

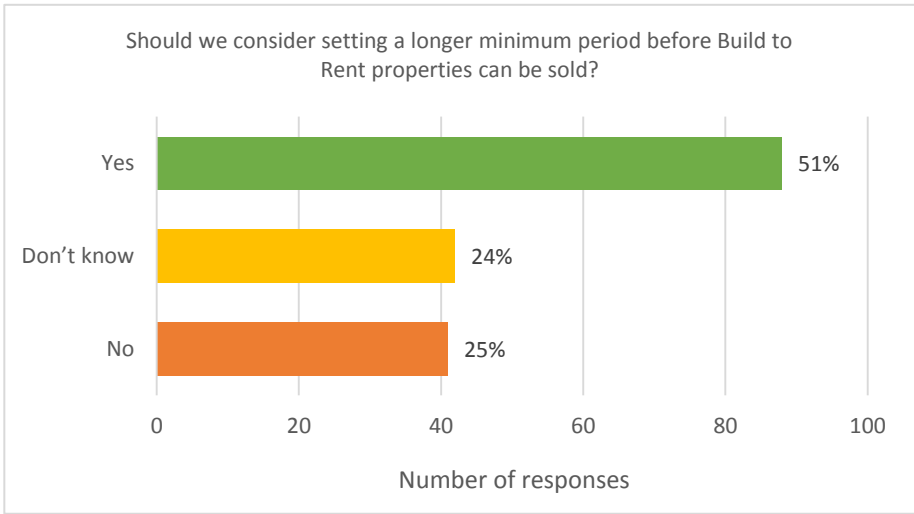
Wandsworth Council commented that there could be a policy to encourage Build to Rent within the areas specified but it should not be precluded that Build to Rent is allowed in other areas. They also commented that it could be subject to more stringent criteria in terms of impact of density in the location.

TfL Commercial Development argued there is a need for high quality private rented housing across London and it would not be appropriate to restrict such provision to particular parts of the borough and that the design-led approach, accessibility and proximity to local services should inform density.

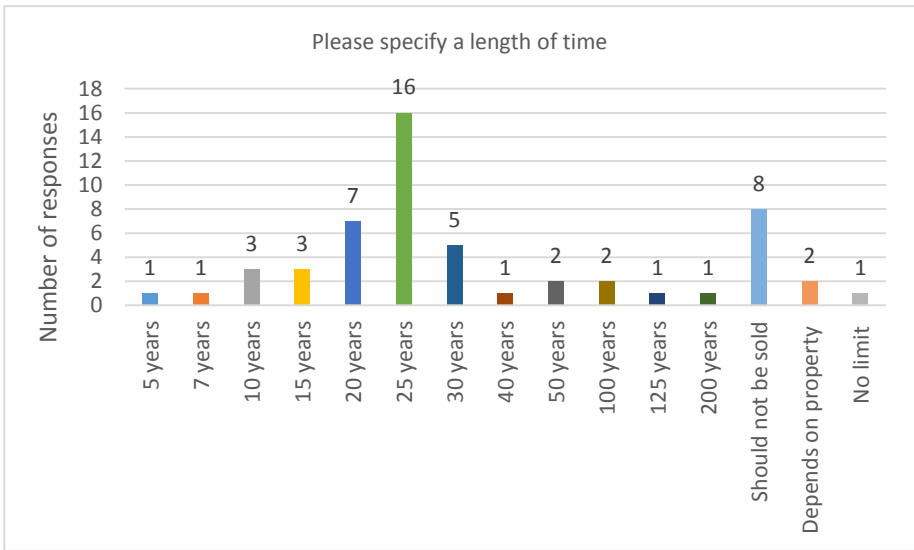
6. To ensure new private rented homes in Build to Rent developments are secured for the rental market for a minimum period before they can be sold, they must be secured through a legal agreement. The Mayor of London says this minimum period should be at least 15 years. Should we consider setting a longer minimum period before this type of rented homes can be sold? If yes, please specify the length of time.

Survey responses

171 responses were received to the question. Just over half of the respondents agreed that there should be a longer minimum period before Build to Rent properties can be sold. 25% said there shouldn't be a longer limit and 24% said they didn't know.



63 respondents provided suggestions of an appropriate length of time for Build to Rent properties to be secured for the rental market before they can be sold. The most popular suggestion was 25 years. 12 respondents suggested a length of time between 30 years and 100 years and 15 respondents suggested a length of time of less than 20 years. 8 respondents said that the properties should never become available for sale.



Written responses

Brixton Society supports the Mayor's requirement for such properties to remain available for renting for at least 15 years. On the other hand, NJL Consulting, on behalf of Cashco, are of the opinion that clear evidence needs to be provided if the council wants to impose a longer minimum period than 15 years.

Statutory consultees

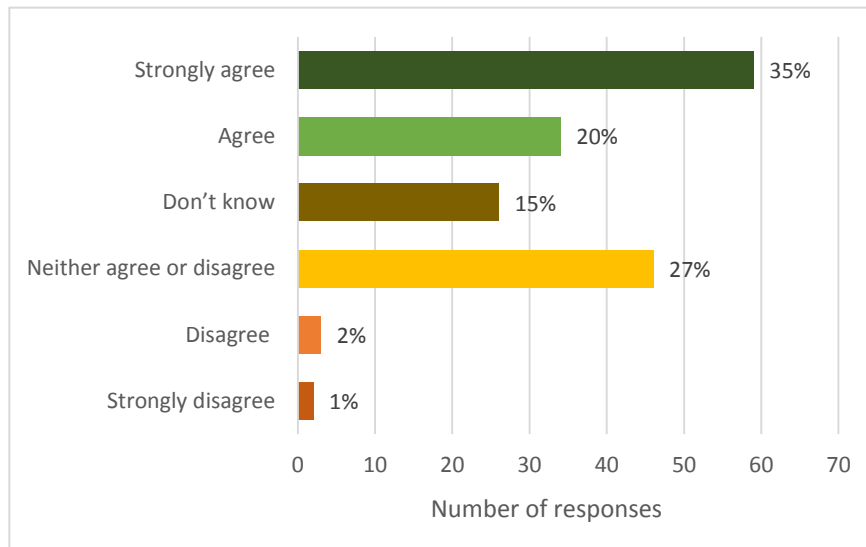
Wandsworth Council argued that as the GLA guidance is stating that 15 years is a minimum, therefore if possible, this should be the starting point in s106 agreements and a longer period should be pushed for where applicable.

TfL Commercial Development stated that the Mayor published 'Homes for Londoners' earlier in 2017 in order to promote a consistent approach to encouraging Build to Rent development and is supported by extensive data and research. They argued that Lambeth's policies in respect of Build to Rent should be consistent with the document, including the definition set out in paragraph 4.9.

7. Vauxhall does not need any more specialist student housing and the priority in that area should be more general needs housing, alongside businesses and jobs. To what extent do you agree or disagree with this statement?

Survey responses

170 responses to the question were received, with just over half of respondents strongly agreeing or agreeing that Vauxhall does not need any more specialist student housing (55%). 15% said they didn't know and 27% said they neither agreed or disagreed. 3% of respondents disagreed or strongly disagreed.



Of the respondents who strongly agreed or agreed with Vauxhall not needing any more specialist accommodation 13 respondents commented that the priority should be for general needs housing, family housing and housing for local residents and it is important to maintain a healthy urban mix and a stable community. Two of these respondents commented that the student accommodation in Vauxhall is often for overseas students and another commented that Vauxhall is not a university location. One respondent said that there is a need to cater for poorer students but this should be provided through general needs housing for those who live and study in the borough.

Four respondents commented that there is already a concentration of student accommodation in Vauxhall that is often expensive, with one of these respondents saying it is only acceptable if there is a plan to get a university campus to locate in Vauxhall. Five respondents consider that student accommodation is a 'money maker' for developers to make profit and to avoid affordable housing.

Of the respondents who said they didn't know, two said they didn't know the area or the population projections enough to comment whilst another said that Vauxhall 'is a lost cause'.

Of the respondents who neither agreed nor disagreed, three said they didn't know enough about Vauxhall, student housing or the evidence in order to comment. Two respondents said there is a need for both types of accommodation as students need to live somewhere but agrees that Lambeth needs more general needs housing, particularly social housing. Another respondent said that the council should let developers decide what type of housing is desirable and another argued that student housing shouldn't count towards the housing target as they are not occupied for much of the year.

Three respondents provided comments as to why they strongly disagreed or disagreed. One commented that student accommodation is ideal for young professionals who wish to live close to both work and city centre whilst another stated that Vauxhall doesn't need any more housing. A developer commented that as the lifetime of the local plan is 15 years, there will be variations in demographics and market conditions which means the plan should be flexible to allow for a number of appropriate uses to come forward over the plan period if there is a demonstrable need.

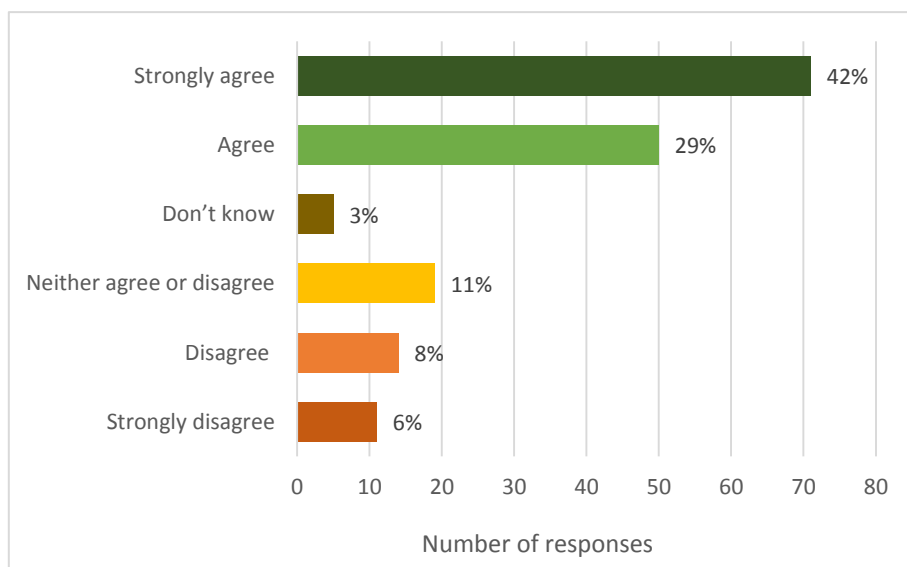
Statutory consultees

The GLA, on behalf of the Mayor of London, commented that student accommodation forms part of the overall housing need for London and purpose-built student accommodation (PBSA) therefore contributes to meeting London's housing need. Strategic need for PBSA is not broken down into borough-level targets, however, boroughs should ensure that local and strategic need for PBSA is addressed.

8. The current Local Plan protects family-sized homes from conversion into flats in streets where there's already a high number of conversions. Our evidence shows that it is possible to increase the overall amount of housing in Lambeth whilst maintaining this policy of protecting family homes from conversion. To what extent do you agree or disagree that we should maintain our policy of protecting family homes from conversion into flats?

Survey responses

Of the 170 responses received for the question, the majority agree with maintaining the policy of protecting family homes from conversion into flats with 42% strongly agreeing and 29% agreeing. 8% disagreed and 6% strongly disagreed whilst 11% neither agreed nor disagreed. 3% said they didn't know.



Two main issues were raised by respondents who agreed or strongly agreed with maintaining the policy to protecting family homes: the importance of family homes and the negative impacts of conversions.

23 respondents commented that it was important to maintain family homes in the borough, highlighting that it is important to encourage families to settle in Lambeth to create a healthy mix and prevent areas turning into ghettos with transient populations. Two of these respondents said it was particularly important to protect family homes in conservation areas and gave Streatham Lodge conservation area as an example where conversions are changing a family area to a transient population. A further three respondents commented that if you convert houses into flats you are catering to younger couples often without children who would need to move to start a family and so families are being forced out of the borough as there is not enough family sized housing units available. One respondent stated that protecting family homes is also important to encourage wealthy people to remain in the area which can increase spending in an area which is needed in areas like Loughborough Junction.

The other issue raised by ten respondents is the impact of conversions on the area. Comments said that conversions impact on parking, noise, disturbance, visual and residential amenity and neighbouring occupiers. Other impacts raised include impact on heritage, traffic and safety procedures. Respondents said that a more stable population would have a more positive impact on the environment and the surrounding areas.

Respondents also said that protecting family homes protects against overcrowding and that the council should be enforcing the policy by checking the council tax register to check for multiple properties at one address. One respondent said that it is not a relevant question as the policy already exists whilst another said that it needs to expand further into areas in Streatham. Another respondent said that it depends on the size of families and that there may be a change in the size of families due to change in benefits.

Of the respondents who neither agreed nor disagreed, four respondents said that it is possible to provide more family houses and homes for first time buyers through conversions if conversions are done properly. They need to provide the space families need and issues such as Controlled Parking Zones need to be considered. One respondent considered that neighbourhoods that have too many young single professionals or couples are transitory but that some family homes are too large for modern smaller families. Respondents who said they didn't know said there will be examples where protecting family homes is valid and other cases where it is not.

Of the respondents who strongly disagreed or disagreed with maintaining the conversions policy, four respondents argued that this type of policy was protecting the homes of the rich whilst social housing is being demolished through estate regeneration programmes. Three respondents said that young families cannot afford family homes so flats are needed and that the demand for larger properties is falling as families are often smaller.

Four respondents argued that it is possible to convert family homes that can provide reasonable homes for more than one family or provide for the changing circumstances of older people whilst still maintaining traditional buildings. Two respondents recommended that it should be done on a case by case basis, such as where the need for the smaller homes outweighs the need for the family home or where the house is being divided to provide for an extended family. Other respondents who disagreed with the policy argued that conversions are a good way to increase the density of housing.

Written responses

The Brixton Society recommends that Policy H6 a (ii) is deleted as it results in a rising number of unauthorised HMOs or the under-occupation of houses by older people, both of which lead to poor maintenance. The Brixton Society argued that this policy tends to exclude family use because original dwellings are too large to be convenient or affordable for most families. Instead, there should be sufficient safeguard against the loss of smaller family homes while enabling the space in larger houses to be used more efficiently.

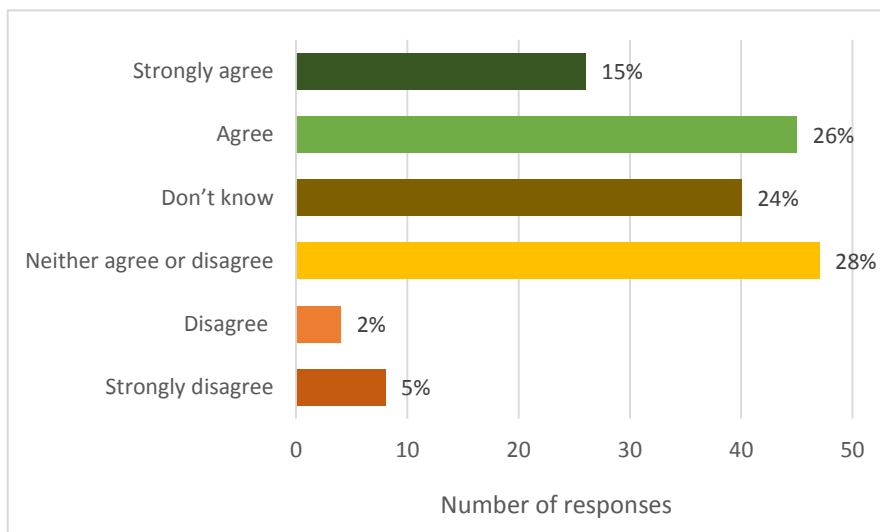
Statutory consultees

Wandsworth Council agreed with the approach of protecting existing established family housing as once a house is converted it is lost from stock as it is unlikely to be converted back. They noted that the draft London Plan is suggesting that conversions are included in small sites and that this is a way of delivering required housing numbers.

9. Our evidence shows that future need for gypsy and traveller accommodation in Lambeth can be met on the existing gypsy and traveller site in Streatham Vale. To what extent do you agree or disagree with the approach of meeting our need for gypsy and traveller accommodation on the existing gypsy and traveller site in Streatham Vale?

Survey responses

Of the 170 responses to the question, just over half of respondents said they didn't know or they neither agreed or disagreed with the proposed approach to meeting the need for Gypsy and Traveller accommodation (52%). 41% said they strongly agreed or agreed with the approach and the remaining 7% said they disagreed or strongly disagreed.



Of those who strongly agreed or agreed, four respondents agreed that meeting the need on the existing site was the best option, with one of these respondents commenting that having designated pitches may stop unlawful encroachment of land. One respondent said the approach was in line with government policy and that residents generally object to having pitches across the borough.

One respondent thought Gypsy and Traveller accommodation is inappropriate for a large city in London whilst another thought there is no case for increasing accommodation in urban areas apart from facilities used by travelling circuses and fairgrounds. One respondent agreed with the approach if it is all the Gypsy and Traveller community required and are happy with the approach, whilst another commented that they have to trust the council's evidence.

Five of the respondents who said they didn't know in response to the question said they didn't know enough about the existing site or the topic to be able to respond. One respondent suggested that the council consults with Gypsy and Travellers.

Of those who neither agreed nor disagreed, one respondent commented that the site should not be made bigger due to problems with the existing site whilst two respondents commented that no provision should be made for Gypsy and Travellers. One respondent suggested that consideration is given to identifying additional sites in the interests of diversity and integration and another commented that Gypsy and Travellers have the same rights to housing but there should be adequate support in place. Two respondents said they didn't know enough about the subject or the feelings of the local residents whilst another said they required a further breakdown of the evidence.

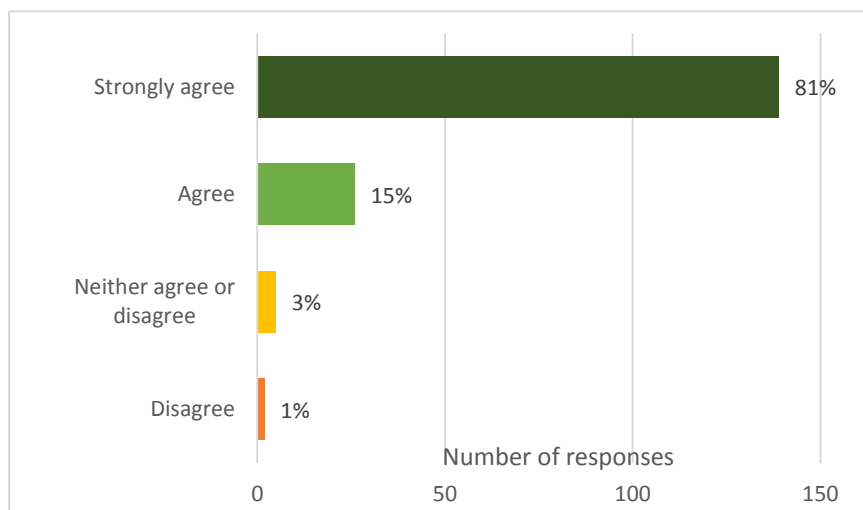
One respondent said that unless there is a national policy with actual practice to protect and explain the Traveller way of life and its needs, local government initiatives and efforts are likely to have limited effect. The respondent went on to say that with a national policy issues raised by residents such as crime and rubbish could be addressed and councils could have a more coherent policy both with the traveller community and their residents.

Of those who strongly disagreed or disagreed, one respondent commented that more Gypsy and Traveller sites are needed and asked that capital letters are used in their name. One respondent questioned whether local residents would like the approach.

10. The Local Plan will continue to provide very strong protection for existing open spaces but there is not enough space in Lambeth to provide large new parks, like Brockwell Park or Clapham Common. However, in addition, we could also require more green infrastructure through new developments, like pocket parks, green roofs and walls, trees, food-growing spaces, riverside access, walks and links between parks, and nature conservation areas. Evidence shows that this type of space has very strong benefits for public health and well-being, nature conservation and managing flood risk. To what extent do you agree or disagree we should require the inclusion of more green infrastructure in new developments?

Survey responses

Of the 172 responses to the question received, nearly all of the respondents strongly agreed or agreed with requiring more green infrastructure in new developments (96%). The remaining 3% said they neither agreed nor disagreed and 1% said they disagreed.



27 respondents supported the inclusion of green infrastructure in new developments because of the positive impact on the environment, the local area, health and wellbeing, air quality, global warming and flood risk. Respondents also commented that green infrastructure can increase pride in a local area and 'green lungs' in a city are important. Two respondents highlighted the importance of protecting trees.

Respondents suggested that developers could provide green infrastructure through s106 monies but that it is important for mechanisms to be put in place to ensure they deliver what is required. Green infrastructure provided in developments should not be tokenistic but should provide high quality, usable green spaces for a range of activities. Respondents suggested that green infrastructure could be provided more imaginatively than more traditional methods. Suggestions included:

- Solar panels
- Increased roof spaces
- Playgrounds
- Green walls
- Sustainable drainage systems
- Mini-parks
- Opportunities for food growing
- Management of green spaces by the local community

- Greening of temporarily vacant sites
- Creating green ways through existing estates (Angell Town, Myatt's Fields South, Myatt's Fields North) that are cycling and walking friendly

Six respondents highlighted the importance of protecting existing open spaces as pressure on them increases, particularly from commercialisation, inappropriate development and Quietways. The London Parks and Gardens Trust suggested that new developments should make capital investment to ensure that parks can cope with increased use. One respondent commented that green space should not be at the expense of historic natural resources whilst another said the council should not be fooled by pocket parks which are too small and by green walls which don't replace the benefit of larger open spaces.

Some respondents provided examples of where green infrastructure works well and examples included:

- Integrating green spaces into high-rise buildings like in Singapore
- Vauxhall Walk
- Southwark's 'low line'
- The allotments at Oval Quarter's Myatts Field

Two respondents commented that some parts of the borough are 'food deserts' in terms of access to fresh fruit and vegetables and there needs to be ownership and security for food growing sites and the unlocking of council-owned land that could be used by communities. The comments argued that all new developments should be required to provide publicly accessible green spaces, and where possible these spaces should be community hubs which allow collaborative activity and/or food production.

Respondents who neither agreed nor disagreed commented that it depends on whether developments will be able to reduce the overall amount of green space through creating 'new' green spaces and questioned who will be responsible for maintenance. Another respondent said that the council has spent money on community growing projects without consultation which are not in use whilst another said the requirements for open space and green infrastructure should be determined on a case by case basis.

Written responses

The Brixton Society considered that the existing EN1 policy needs strengthening and are concerned that EN1a (ii) allows for the infilling of open spaces within existing estates which were constructed to strict density guidelines to provide amenity space for residents. These sites should not be removed for short-term advantage but should encourage initiatives for gardening, food-growing and dedicated play-spaces. For EN1d, the Brixton Society argued that Areas of Open Space Deficiency should be identified more clearly in the Plan to help identify areas in the borough where additional public open space could be created.

NJL Consulting, on behalf of Cashco, commented that although the benefits of green infrastructure in developments are clear, it must be understood that it is a cost to a developer and may not be viable or feasible in some circumstances. An element of flexibility should be included in any requirements.

Friends of Ruskin Park argued that the importance of environmental, social, health, economic and heritage benefits of parks and green spaces in the Borough has not been sufficiently recognised and prioritised in the Local Plan, or in the selected topics for the partial review. They outlined their views that Ruskin Park has not received adequate capital investment or maintenance budget for landscaping or sport over the past seven years and unless this is addressed the aims of the Borough Plan will not be achieved for Ruskin Park. They welcomed the greater emphasis in the Mayor's draft London Plan for Green Infrastructure and Natural Environment and requested that policies for local green and open space, the preparation of a borough green infrastructure strategy, biodiversity and access to nature, trees and woodlands and food growing should be considered in the review of Lambeth's Local Plan.

The Community Food Growers Network argued that in order to protect and improve the health and wellbeing of people through every new development that is built and to prevent harm to the environment, it is imperative that the Local Plan renews its commitment to green infrastructure and builds on the promotion and celebration of productive green environments through firmer and more fruitful commitment to food growing projects and sites. Lambeth as a Food Flagship should lead the way on this. Their comments included suggestions of how to deliver this:

- Green infrastructure developed in housing developments (which should take place on every new development in the borough) should be accessible to all members of the public.
- Lambeth should be moving on from supporting short term food growing policy and make fresh commitments to protect existing community food spaces which are currently under threat of closure due to a lack of funding and development proposals which fail to secure their safety (as mentioned in reference to the draft London Plan). Across Lambeth there are food deserts in which local people are not able to maintain the highest standard of health and well-being due to the boroughs lack of amenities. Given this reality, the protection, expansion and further incentivising of food growing projects and activities should be far higher on the list of priorities within the borough.
- Green infrastructure has the potential to provide spaces of community development which would improve health and well-being and combat food poverty and insecurity if Lambeth were able to commit to the protection and development of productive green environments, namely, food-growing sites.
- Support is given, as Lambeth's Green Infrastructure Strategy does, to the implementation of green roofs and meanwhile spaces but the strongest food growing projects with the greatest community impact are those with access to a significant amount of land over a long period of time. The new Local Plan needs to recommit to food growing through a more rigid and robust set of demands on new developments and incorporate proactive attitudes to working with communities and supporting community run and led initiatives.

Loughborough Junction Action Group (LJAG) and the Loughborough Junction Neighbourhood Planning Forum are supportive of Lambeth's policies on Green Infrastructure and the supporting evidence provided by Lambeth's Green Infrastructure Strategy. However, LJAG made the following points:

- The area north of Ruskin Park is identified as an area of Open Space Deficiency and the railway viaducts dissecting the area is seen as a contributor to the problem. LJAG would like to see Lambeth Council adopt a policy of developing walking and cycling routes alongside Network Rail's viaducts in Loughborough Junction and elsewhere in the borough to increase walking and cycling. Southwark council is developing the 'Low Line' walking and cycling routes alongside the raised viaducts in Southwark and Lambeth could work with Southwark council to extend this through Lambeth.
- LJAG would like to see more emphasis given to 'green chains' in Policy EN1. In order to improve Loughborough Junction's green space deficiency, strengthening policy for green chains could make a significant impact on the area and there is scope to link the area's parks and green spaces: Ruskin Park, Myatt's Fields, Elam Street Open Space, Wyck Gardens and Loughborough Park.
- LJAG would like to see Policy EN2 strengthened with a greater commitment to food growing and its contribution towards community well-being.
- Policy Q10 requires strengthening to place a greater emphasis on tree planting to counter the adverse effects on air pollution, especially along major routes.

Statutory consultees

Wandsworth Council stated they strongly agreed. TfL Commercial Development also supported the provision of green infrastructure within development schemes of an appropriate size and considers it to be critical to good place-making.

The GLA, on behalf of the Mayor of London, stated that the draft new London Plan introduces an Urban Greening Factor (UGF) in Policy G5 Urban Greening and boroughs should develop an UGF to identify the appropriate amount of urban greening in new developments.

11. We are working on an updated infrastructure plan for Lambeth which is linked to the development of Cooperative Local Infrastructure Plans (or CLIPs). The main types of infrastructure we must plan for borough-wide are:

- Public transport
- Infrastructure for electric vehicles
- Infrastructure for cycling and walking
- Green infrastructure
- Healthcare facilities like hospitals, GP surgeries, health centres and pharmacies
- School places and other educational provision
- Childcare and early years provision
- Libraries
- Sports, leisure and play facilities
- Facilities for police, ambulance and fire services
- Energy and water
- Waste facilities
- Cemeteries and crematoria
- Digital infrastructure and telecommunications

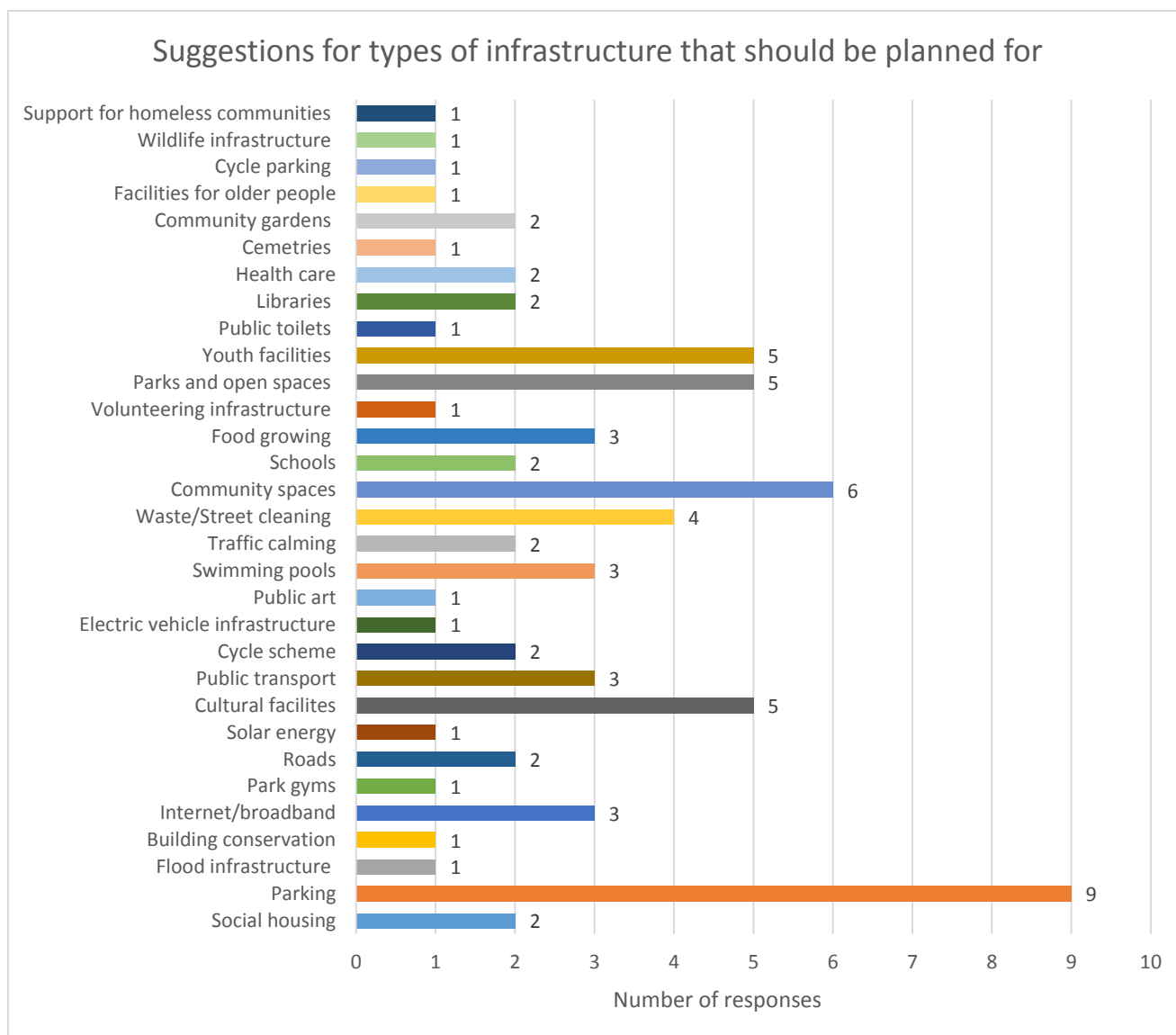
Please tell us about any other infrastructure you think should be included.

Survey responses

72 respondents provided suggestions on the type of infrastructure they think the updated Infrastructure Delivery Plan should include. The most popular suggestion was parking, followed by community spaces. Those who suggested parking commented that it is important for small businesses and that some members of the population, for example older people, are reliant on using their car. Respondents who suggested community spaces highlighted the importance of affordable community spaces and meeting rooms where groups can come together to meet or run projects or offer services and facilities to older people.

Suggestions for cultural facilities included galleries, museums, theatres and concert halls, whilst suggestions for youth facilities included youth centres, athletic tracks and skate parks. One respondent commented that BT have a policy to provide free GPON cabling to all new development of 30 dwellings or more and suggested that as there is now more homeworking, internet provision should be a standard planning policy for all new housing.

Respondents who suggested public transport commented that transport infrastructure should be planned using more sophisticated measures than PTAL, using the latest population data and projections. Others suggested that Streatham needs an extension of the tube and that there should be plans for more east to west buses. Suggested traffic calming measures included road closures, speed humps, speed cameras and the enforcement of the 20mph limit. One respondent raised concerns about charging points for electric vehicles and whether blind residents will be able to see them. Another respondent commented on the need for more accessible streets and public buildings.



Written responses

The Brixton Society would like to see sewer capacity looked at, given the substantial increases in density on local sites and that typical domestic water usage for most households has increased substantially since local sewers were installed in the 1860s to 1880s.

Statutory consultees

Savills provided comments on behalf of Thames Water, in its role as the statutory water and sewerage undertaker in the borough. Much of Lambeth drains to one of Thames Water largest sewage treatment works, Crossness STW and to ensure Crossness STW caters for the growth coming forward in the catchment, Thames Water are undertaking a study of the sewage treatment works processes. Thames Water commented that the Local Plan will enable them to understand what upgrades are needed and when and that they will continue to work closely with Lambeth and all stakeholders in the local area to discuss what improvements to their infrastructure will be necessary in future years. Thames Water commented that they would welcome an early indication of new development sites likely to come forward through the partial review of the Local Plan and would welcome the retention of supportive policies within the adopted Local Plan in relation to water and sewerage infrastructure.

Wandsworth Council suggested creative and cultural infrastructure and potentially supported housing facilities.

12. Do you have any other comments?

Survey responses

23 respondents provided other comments related to housing growth and infrastructure. The comments provided by these respondents can be summarised as the following:

- Consideration should be given to waste collection, fly tipping, littering and street cleaning as these things get worse as more people live in an area.
- Estate regeneration should be stopped until an assessment has been done of what happens to the existing communities in these areas and the necessary repairs should be made.
- Lambeth has a tall tree problem.
- The council should follow Islington's approach to using s106 agreements to ensure that all new builds have a requirement in their leases and deeds that the houses should be lived in, as it is pointless to build new housing if they are not going to be lived in.
- The Mayor's 2010 design standards should be preserved, rather than accepting what the market determines.
- Crossrail 2 or a tube line is needed in Streatham to help with traffic congestion on the roads and population growth.
- The OAKDA site is too high and too dense.
- More support need to be given those with disabilities, for example railings in Brockwell Park to help people access or the pool or parking to help disabled or elderly people access taxis at night.
- Artificial intelligence and robotics will create big issues in the next 10 to 15 years
- The policy on tall residential towers should be tightened up and should specifically rule out tall towers except in locations identified as suitable for such development or focus high density developments in places that are already high density in nature.
- The council should consider a list of local residents, as is done in Amsterdam, who wish to buy newly built council houses at a reduced price to reward the commitment of local residents who have lived in the area for a long time but whom may not be able to afford a flat on the open market.
- Streatham needs an expanded Controlled Parking Zone to address commercial vehicles being stored on the street for long periods of time.
- New residential redevelopments should ensure future residents have access to healthy foods – as recommended in the TCPA's work on 'Healthy Environments'.
- The Local Plan Review consultation should have been more widely promoted and not all of the information is provided to answer the questions.
- The vision of a good place to live and work should be embedded in all of the policies in the Local Plan.
- The policies in the Local Plan should only address the things the council is responsible for and less of the things people are able to do themselves to provide less regulations.
- The Local Plan should avoid creating ghettos of rich or poor and should encourage more employment opportunities in areas of high unemployment.
- West Norwood and Tulse Hill have been neglected.
- The Local Plan should protect back gardens from development.
- Conservation areas and listed buildings need to be preserved and require stronger protection.
- Developments should be required to provide more social housing and should not have separate entrances.
- The council should be looking at engaging with Community Land Trusts rather than Housing Associations.
- The Local Plan should develop policies to assist or encourage older people, both in owner-occupied and rented properties, to downsize from homes which are too big for needs.
- The Local Plan should ensure that tall buildings do not have a damaging effect on the design nor the experience of using public green spaces.

Written responses

The Home Builders Federation (HBF) commented that the new Lambeth Plan should be based on the housing target in the draft new London Plan of 1,589. This includes a small sites target of 654 dwellings per annum which is a challenging objective for which the council should not rely wholly on windfall supply to achieve this target but identify and allocate as many sites as possible. The HBF also argued that the council should begin work in a design-code to enable the presumption in favour of small site development to operate efficiently. In terms of infrastructure, the HBF commented that the council should consider carefully the range of its policy expectations and the costs of pursuing some of the London Plan policies in order to ensure there is adequate value for affordable housing and transport contributions.

Statutory consultees

The GLA, on behalf of the Mayor of London, set out a number of comments in relation to the draft new London Plan which was published for consultation on 1st December 2017:

- Anticipated that the Examination in Public of the London Plan will take place in autumn 2018, with publication in autumn 2019.
- Lambeth is in an excellent position to take account of the policies in the draft new London Plan but it is not necessary to repeat all of the policies as the new London Plan will form part of Lambeth's Development Plan but Lambeth may wish to tailor some policies to suit its local circumstances, based on local evidence.
- The revised Lambeth Plan is required to be in general conformity with the current London Plan and is expected to be aligned with the draft new London Plan as its policies gain more weight as it moves towards publication.
- The draft new London Plan will now be a material consideration in planning decisions.
- The London Plan sets Lambeth a 10-year net housing completions target of 15,890 units (1,589 per annum) and of this target, 6540 completions should be identified from small sites. Lambeth's revised housing target is marginally higher than its existing target of 1,559 per annum.
- Lambeth has performed extremely well against its London Plan target, exceeding it in the past few years by delivering 2,811 homes in 2015/16, 2,065 homes in 2014/15 and 1,716 homes in 2013/14.
- To ensure continued excellent delivery, Lambeth's revised Local Plan should set out a clear strategy, allocating sufficient land and including proactive policies, taking into account the measures set out in draft new London Plan policies H1 (Increasing housing supply) and H2 (Small sites).
- To deliver the small sites target, boroughs should apply a presumption in favour of small housing developments from infill development on vacant or underused sites and for sites within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary promoted residential conversions and extensions, including upward extensions, development and infill.
- The Mayor recommends Lambeth's Local Plan includes a positive approach to small sites to meet the requirement in emerging Policy H2 for boroughs to prepare area-wide design codes to promote good design and higher densities on small sites.

Thames Water recommended that in relation to basement development, any changes to the Local Plan should ensure there is a policy requirement for positive pumped devices to be installed as part of any drainage for basement development in order to protect against sewer flooding.

Network Rail set out that they have recently announced plans to release land for the development of around 12,000 new homes as part of its contribution towards the Government's target to release land with the potential for 160,000 homes. Network Rail's comments can be summarised into the following issues:

- Nearly 200 sites across the country have been identified as suitable housing development opportunities for around 12,000 new homes and it is anticipated that land for around 5,000 of these will be delivered in London.
- The delivery of these sites is far from easy and realise full development potential, Network Rail requires assistance and support from Lambeth, the GLA and TfL.

- Many sites have difficult constraints and abnormal costs that are associated with developing on railway land or on/over railway assets, and it is therefore requested that the new Plan acknowledges both the potential that these sites can bring, but also the costs associated with delivering them. It is requested that a flexible approach is adopted when considering the development of railway land and assets to recognise the constraints they possess.
- It is important that the work that was carried out by the GLA and London Land Commission (LLC) in respect of the development of public land is not lost nor seen as finished. It is vitally important work continues with public bodies to assist in the delivery of the identified sites. A prime example of this is the site at Knolly's Yard, Tulse Hill.

Transport for London Commercial Development commented that they have been set an ambitious target by the Mayor to commence the development of 10,000 new homes in London by 2021; at least 50% of these new homes must be genuinely affordable. TfL have identified a number of sites for residential, mixed-use development which will make a significant contribution towards meeting borough and TfL housing targets, as well as improved public transport infrastructure. The sites include:

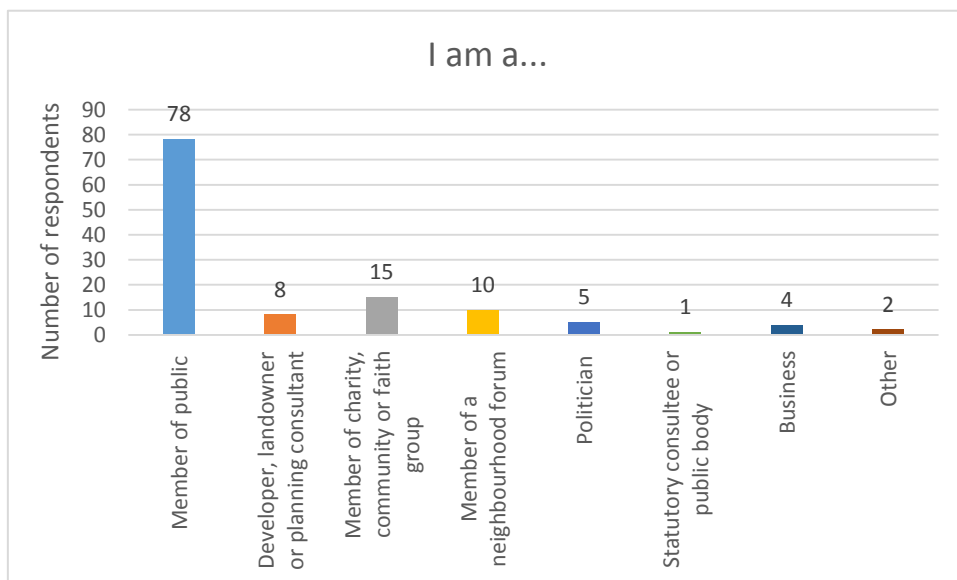
- Fenwick Estate: a wholly affordable housing scheme to provide 55 new social rented homes.
- Vauxhall Cross: where TfL is proposing realignment of Vauxhall gyratory and reconfiguration of Vauxhall Bus station. There is the future opportunity to provide significant housing and commercial development above and around to enable the development potential of the site to be fully optimised.
- Land at Christchurch Road: potentially, a wholly affordable housing scheme led by the community.
- Brixton Bus Garage (former tram shed), Brixton Hill: where there is an opportunity to co-locate the bus garage with new housing.
- Stockwell Station: there may be an opportunity to redevelop the station and adjoining land with housing above.
- Montford Place: in line with the emerging OAKDA masterplan TfL supports the removal of the Montford Place – Beefeater / Oval Gas Works KIBA designation. This should be extended to the whole of the KIBA area and include the TfL-owned temporary work site located to the east of Montford Place. This site has the ability to provide in the region of 100 homes, together with business / commercial / employment at ground floor level.

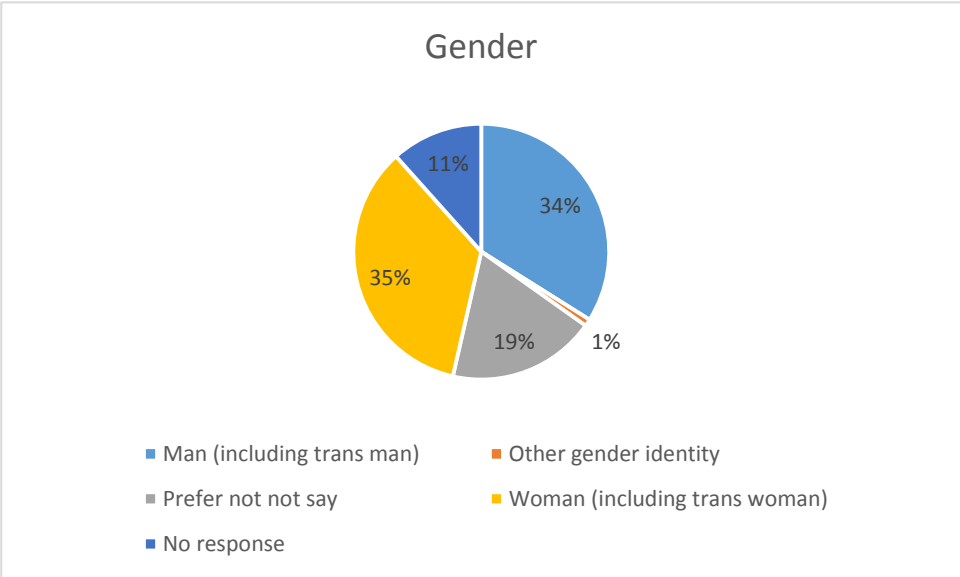
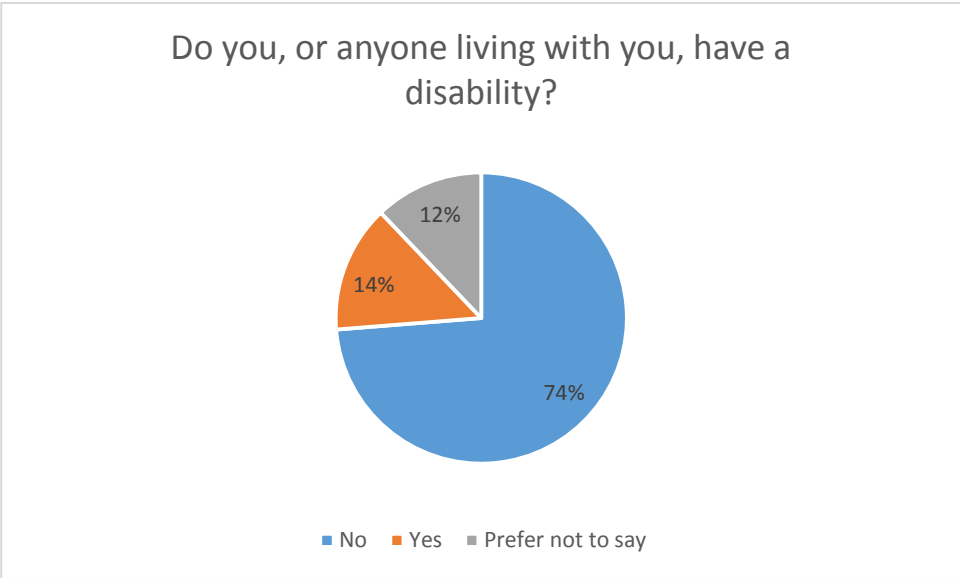
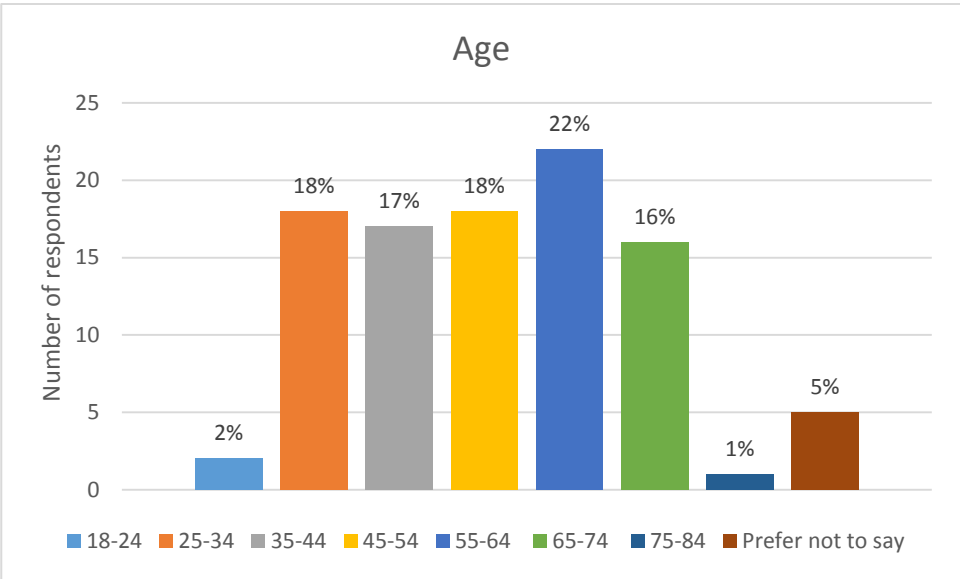
3.5. Affordable housing

In response to the 'Affordable housing' survey, 99 survey responses were received. A total of 11 written responses, including statutory consultees, was received.

Survey responses

- The majority of responses for the Affordable Housing survey identified as being members of the public (78 respondents). Eight respondents identified as being a developer, landowner or planning consultant. 15 respondents identified as being a member of a charity, community or faith group, 10 identified as being a member of a neighbourhood forum and five identified as being a politician. Four respondents identified as being a business and two identified as 'other' but did not specify. It should be noted that some respondent identified as belonging to more than one category.
- A total of 93 survey respondents provided details of their age. Most identified as being between 25 and 74, split fairly evenly between the age categories. The largest group was 55-64 year olds; 22% of respondents identified as being in this category. Two respondents were under 24 and one was over 75.
- 14% of respondents said that they, or someone they lived with, had a disability.
- The majority of Survey responses came from respondents who identified as being White British (64). Twelve responses were received from respondents who identified as having another White background. There was one respondent from each of the following backgrounds:
 - Black or Black British: Caribbean
 - Black or Black British: Other African background
 - Mixed: White and Asian
 - Mixed: White and Black Caribbean
 - White: Gypsy or Irish Traveller
 - White: Irish
 - White: Polish

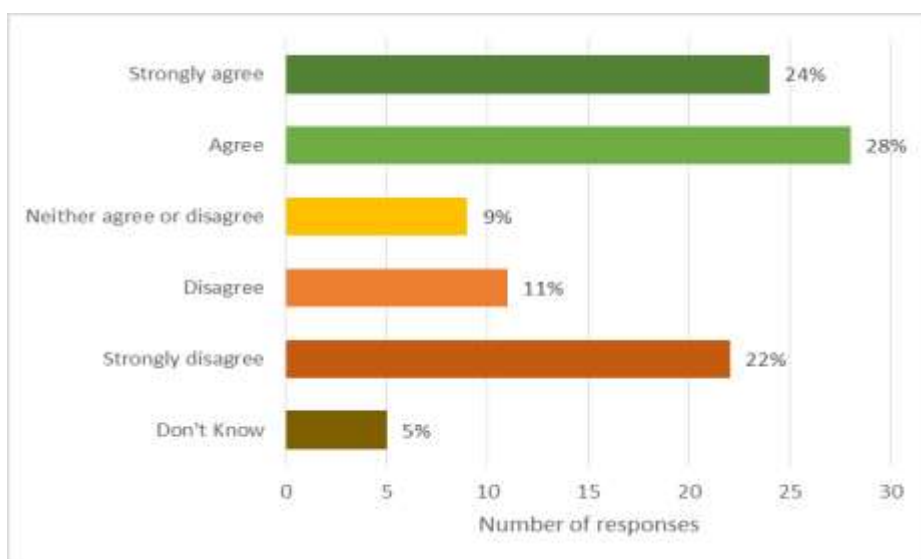




1. The Mayor of London has introduced new guidance for the current London Plan setting out a 'threshold approach' to affordable housing across London: where a development can provide at least 35 per cent affordable housing on site and all other policy requirements are met, then the financial viability of the scheme will not be tested (known as the 'Fast Track Route'). For proposals that don't meet these requirements, the standard approach remains. The Mayor thinks this is likely to result in an increase in delivery of on-site affordable housing in larger schemes, which has recently been about 13 percent on average London-wide. It is likely that the Mayor will carry this threshold approach forward into new London Plan policy. If this is agreed through the examination of the new London Plan, the new Lambeth Local Plan would have to follow this approach. To what extent do you agree or disagree we should follow the Mayor of London's threshold approach to development viability in the review of the Lambeth Local Plan?

Survey responses

Of the 99 responses to the question, just over half of responses (53%) agreed or strongly agreed that Lambeth should follow the Mayor's approach to viability, and around a third (33%) disagreed or strongly disagreed. The remaining 14% neither agreed or disagreed or didn't know.



Of those respondents who agreed or strongly agreed with the approach, five respondents suggested that the 35% threshold isn't enough and should be higher. One respondent argued that developers should not be allowed to avoid meeting the existing 40% Affordable Housing requirement, although one respondent acknowledged that it was realistic. Other respondents said there was a need for a co-ordinated approach to viability to avoid developers playing local authorities against each another, with the Mayor taking the lead on a holistic approach across London.

Several respondents made reference to developers avoiding affordable housing obligations, suggesting that not testing viability allowed developers to avoid affordable housing requirements and unredacted viability assessments should be made public if policy-compliant levels of affordable housing are not provided. Four respondents commented on the perceived reduction in levels of affordable housing on schemes after they are approved.

Developers were supportive of the approach. One argued that the Fast Track system provides more certainty for applicants, and another that it provides a more efficient way to go through the planning system to speed up delivery of housing. A member of the public commented that the approach was well thought through.

There was one suggestion that a policy approach above the 35% should be justified through Lambeth-specific evidence, including its viability characteristics, and the council's regeneration aspirations, submitted by a planning consultant. Another comment questioned how the council will enforce the 35%, and suggested that each viability-tested development should have a public scrutiny session of the viability assessment.

Five respondents raised questions about the term 'affordable housing' and the definition of Affordable Rent as 80% of market rent. Three respondents commented on the need for more genuinely affordable housing or social rented housing whilst another argued that based on the local average and median wages, most people would be unable to afford a mortgage on a new build property. They also argued that Help to Buy is unfair and unaffordable, accompanied by high service charges.

Of those who were neutral or didn't know, one response raised concerns about an increasing population causing a greater need for housing in general. Three comments raised concerns about the levels of affordability and the need for more genuinely affordable homes or social housing in Lambeth. One commenter didn't know enough about the Mayor's plans in general to comment, and two didn't know enough about the likely impacts. One respondent agreed that the 35% should be applied to large scale development, but equally that Lambeth's 40% should continue to be applied.

Of those that disagreed with the statement, three respondents thought that the 35% target was too high, that reducing the requirement (or avoiding lengthy negotiations) would lead to more housing delivered overall, or delivered faster.

Seven respondents thought that the threshold was too low. One comment thought that the target should be at least 50%, and others stated that the current 35% target risked creating segregated communities or economic stagnation because people cannot afford to live and work in London. A further four comments felt that the existing 40% target should be held on to and more robustly enforced.

A number of comments expressed suspicions that developers would misuse the 35% threshold to provide less affordable housing than is genuinely viable, or otherwise get round the requirements. Two comments expressed the need for transparency around viability information in all developments, and one argued that the viability should be tested on all developments that include a guaranteed profit margin. Two comments emphasised the importance of viability in ensuring developments are completed to avoid half-built schemes or vacant land.

There were several comments expressing concerns around affordability: that the price of new developments in Lambeth is too high compared to local incomes, or that the definition of 'affordable' is not clear, and that affordable accommodation priced at 80% of market rent is not affordable. One respondent questioned the approach to affordable housing completely, and felt that there should be more building by the public sector, and well as rent controls in the private sector and less emphasis on home ownership.

Other comments from the survey are summarised below:

- Areas of high housing prices and business development should be used to subsidise affordable housing in more suitable areas.
- A lack of proper planning will cause problems in the future.
- The lack of affordable housing was primarily due to under-occupancy and vacant properties left by foreign investors.
- Concern about having separate access arrangements for market and affordable housing, and that more needs to be done to ensure community cohesion.
- As the Affordable Housing SPG is currently subject to a Judicial Review and the new London Plan still in Draft, affordable housing requirements should be determined through viability assessment.

Written responses

The Brixton Society commented that they would prefer schemes providing less than 40% affordable housing to be subject to a viability assessment.

A response on behalf of ITV plc recognised the importance of providing Affordable Housing, but noted the economic difficulties of doing this. They also commented that it is too early to assess the impact of Mayor’s SPG and the new London Plan. A response on behalf of Cashco noted the need for more affordable homes, but commented that any policy should retain flexibility based on viability, or there is the risk of impacting housing supply. UDN Properties Ltd were keen to provide the maximum contribution and welcome the more streamlined approach to viability. However they were also keen to see a more flexible approach to review mechanisms.

A response on behalf of R&F Properties Ltd pointed out the difficulties for schemes to viably achieve the 35% threshold since the Mayor’s SPG was adopted. They suggested that the updated Lambeth Local Plan should follow the Mayor’s approach but clearly set out type of affordable housing which is needed locally, and be tested for viability.

Statutory consultees

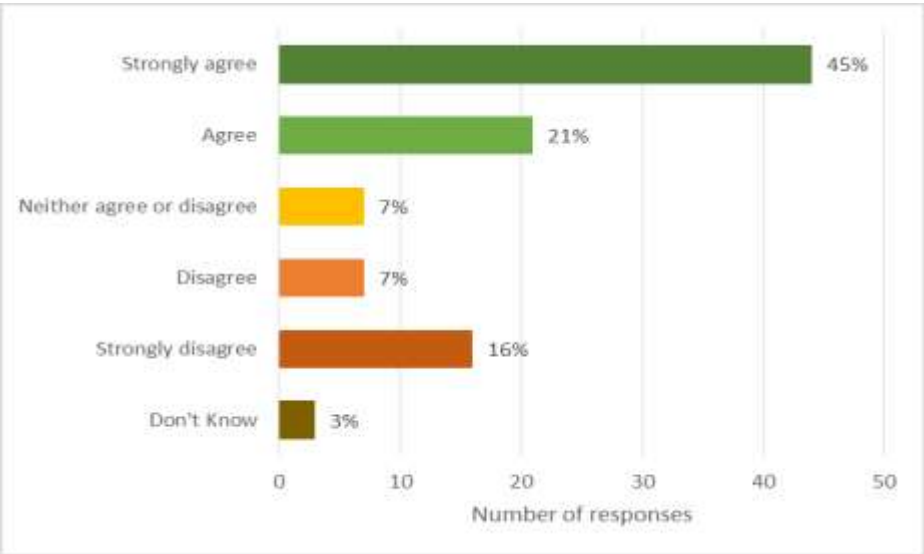
Wandsworth Council commented that the preferred approach depends on whether Lambeth is meeting targets, whether the target is based on habitable rooms or units, and whether the tenure split set out in the Mayor’s approach is similar to existing Lambeth policy. They also commented that Lambeth should be aware of impacts for housing across the wider area.

The GLA, on behalf of the Mayor, encouraged Lambeth to adopt affordable housing policies set out in the draft new London Plan, including policies H5, H6 and H7.

- 2. There may be scope to introduce a higher affordable housing threshold for Fast Track Route applications on industrial land released for housing. This means that in those locations, the affordable housing threshold at which applications would not be subject to viability testing would be higher than 35%. The reason would be that land values are generally lower for industrial land thereby allowing higher levels of affordable housing to be provided. The Mayor of London is proposing that the threshold for industrial land released for housing should be 50%. To what extent do you agree or disagree that we should introduce a higher than 35% affordable housing threshold for Fast Track Route applications on industrial land released for housing? If you have selected strongly agree or agree, what do you think the higher threshold should be?

Survey responses

98 respondents provided an answer to the question, with 66% of responses either agreeing or strongly agreeing that the affordable housing threshold should be higher on industrial land released for housing. 23% disagreed or strongly disagreed and the rest neither agreed nor disagreed or don’t know.



Where an alternative threshold was preferred, suggested targets ranged from 40% to 100%, with the majority of respondents suggesting 50%. Several respondents also suggested that social housing should be the priority.

Other respondents made comments but did not suggest a percentage target. These respondents suggested:

- It would depend on the site.
- They agreed with the Mayor.
- Housing should be genuinely affordable.
- There are concerns about social housing provision, gentrification and empty high value properties.
- Home building should be taken away from developers to meet the current need for affordable housing, with more council housing being built, tighter rent controls and a move away from home ownership.

Written responses

A response on behalf of Cashco argued that it would be inappropriate to have different affordable housing requirements across the borough. They considered that on sites where the delivery of industrial uses has been difficult, further restrictions could result in land remaining undeveloped and have a negative impact on housing supply. They pointed out that land value depends on a number of factors (not just existing/former use), and questioned why a different target would only be applied to industrial land, not other land types. They also stated that a 50% affordable housing requirement would be too high and too restrictive.

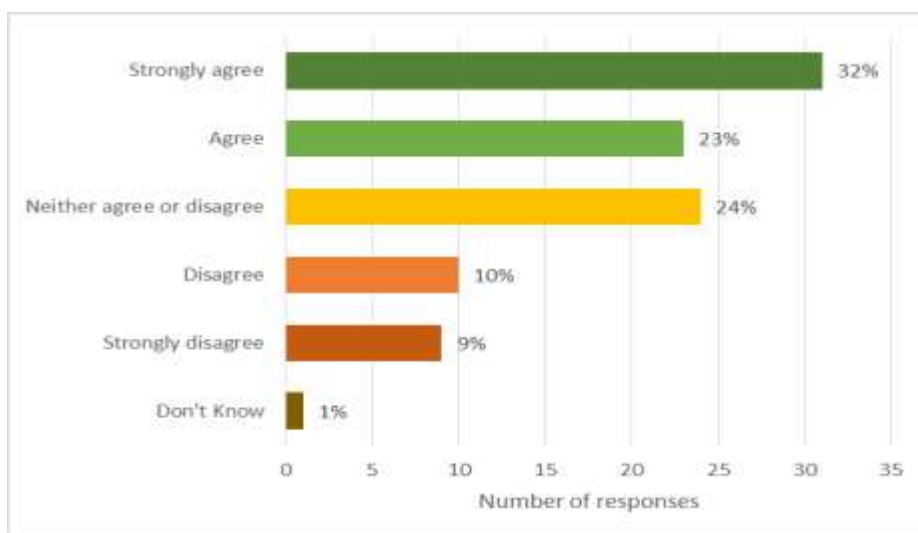
Statutory consultees

Wandsworth Council agreed in principle that affordable housing requirements should be higher on industrial land, although not at the expense of other planning considerations such as design and density.

3. The Lambeth Local Plan needs to strike the right balance between housing and jobs. Securing affordable workspace within new development can sometimes impact on the amount of affordable housing that can be secured. If a choice has to be made in new developments, securing more affordable housing should be a greater priority than affordable workspace for small business. To what extent do you agree or disagree with this statement?

Survey responses

A total of 98 respondents strongly agreed or agreed that securing more affordable housing should be a greater priority than affordable workspace for small business. 19% respondents either disagreed or strongly disagreed and 24% neither agreed nor disagreed. 1% of respondents said they didn't know.



14 respondents who either agreed or strongly agreed commented that there is a bigger need for housing than for workspace and housing should be prioritised. Some respondents argued there are already plenty of options for affordable workspace and hot-desking in the borough whilst others acknowledged that while more affordable workspace would be beneficial, housing is the greater need.

Respondents acknowledged that getting the right balance between housing and workspace is difficult and that there should be support for small local businesses. Others commented that a better use could be made of existing workspace, including affordable rents in existing office blocks and a better targeting of affordable workspace to local businesses. One respondent suggested that libraries are affordable workspace and shouldn't be closed. Two respondents acknowledged that there could be locations where affordable workspace is prioritised, such as town centres or sites unsuitable for housing.

Six respondents who disagreed that affordable housing should be prioritised over affordable workspace said there was a specific need for affordable workspace in the borough, a need to create local job opportunities and to attract small and large businesses to the borough. One respondent highlighted that creating local job opportunities would reduce the need to commute into Central London on public transport that is already at capacity.

Four respondents argued that there is a need to ensure a balance of uses, with employment opportunities, for the identity and vitality of neighbourhoods. Other respondents stated that there is existing space in the borough that can be used for affordable workspace, such as arches and old retail spaces. One respondent said that if business space is required to support a new housing development, this should be required from the developer, whilst another respondent commented that developers should be providing affordable housing.

Respondents who neither agreed or disagreed or said that they didn't know provided a range of reasons:

- Both affordable housing and affordable workspace are important and there should be a balance.
- Luxury housing has been prioritised over both social housing and local businesses, with the council giving away housing stock to developers.
- Affordable housing and affordable workspace requirements should be determined on a case by case basis, based on market requirements.
- The definition of affordable housing and affordable workspace is questioned.
- If affordable housing is not genuinely affordable for local people then it should be helping local businesses.

Other respondents suggested that the distinction between housing and workspace should be removed, with more live-work arrangements. Another respondent suggested that Lambeth should work with existing small businesses, particularly those in Brixton/Herne Hill railway arches.

Written responses

The Brixton Society suggested that affordable workspace should only be required where there is existing employment floorspace that is being redeveloped or where there is a masterplan or site allocation that specifies affordable workspace.

A response on behalf of ITV Plc stated that affordable workspace may be more appropriate than affordable housing in some circumstances.

A comment on behalf of Cashco stated that it is important to seek both uses to create sustainable communities. They suggested having a flexible policy that takes into account the location of a development and its surrounding uses.

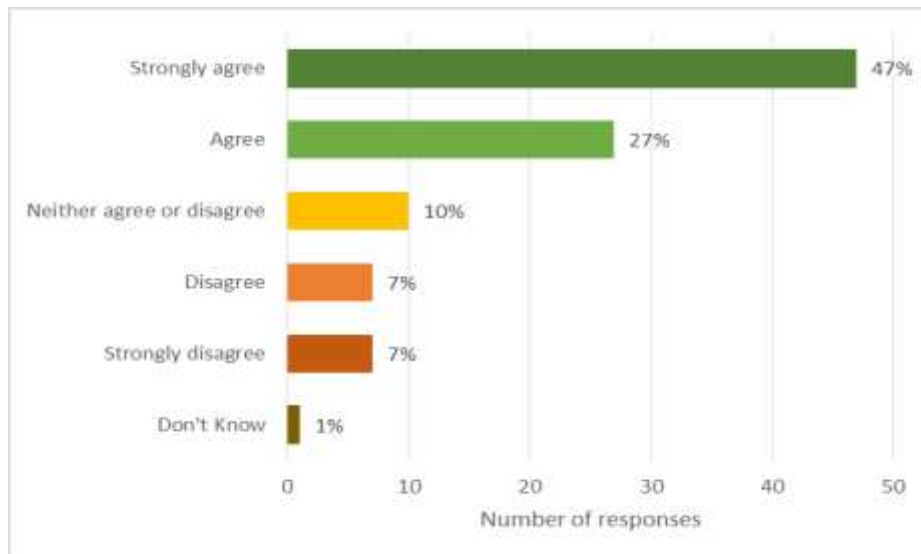
Statutory consultees

Wandsworth Council commented that the preference for affordable workspace or affordable housing should be site-specific and depend on whether the location is more appropriate for housing or workspace. The management of affordable workspace requires waiting lists and a criteria for applying to avoid subsidising businesses that are not operating profitably.

4. The existing Local Plan requires developments involving fewer than 10 homes to provide a financial contribution towards affordable housing, subject to financial viability. The government is concerned that this type of policy will prevent small housing developments coming forward. We need to justify continuing with this approach. Our evidence shows that in the year ending March 2016 developments of ten or fewer homes in Lambeth accounted for about a third of all new housing. Given the high level of need for affordable housing, these smaller schemes could contribute towards provision of affordable housing if financially viable. To what extent do you agree or disagree that smaller schemes should contribute to affordable housing (if financially viable)?

Survey responses

The majority of respondents strongly agreed that smaller schemes should contribute to affordable housing, if financially viable (47%), with a further 27% agreeing. 14% of respondents either disagreed or strongly disagreed and 1% said they didn't know. 10% of respondents neither agreed nor disagreed.



Of the respondents who agreed or strongly agreed that smaller schemes should contribute to affordable housing if financially viable, several respondents said that it was essential because of the high levels of need for affordable housing. Two respondents suggested that developers should share their profits and two respondents argued that there should be no exemptions for anyone and small developments should contribute. Other respondents argued that without the requirement for affordable housing on small sites developers would use it as a way to avoid obligations and developers will not start a scheme unless it is profitable, no matter the size of the site.

Three respondents suggested that it should be dependent on circumstances, such as the size of the developer and the type of development. One respondent stressed the importance of creating social housing and not just affordable but three respondents suggested that on-site affordable housing on small sites would create mixed communities, avoiding ghettos of expensive housing.

One respondent suggested that the current approach should continue if it is successful and another felt that as a large proportion of development in Lambeth is on small sites, it would be sensible to continue to require a financial contribution. However, another respondent suggested reducing the threshold to four or five units to exclude house conversions from affordable housing requirements.

Of the respondents who disagreed or strongly disagreed, four respondents, three of whom were planning consultants or developers, raised the potential impact on SME builders and that Lambeth should be encouraging smaller developers. Three respondents suggested that it could reduce the delivery of housing on small sites and is a 'stealth tax' on developers. Two respondents argued that current affordable housing is not affordable.

Four respondents who neither agreed nor disagreed or didn't know, commented that development on small sites or by smaller firms was more desirable and should be encouraged, suggesting there are better standards and less disruption. Three respondents said it depended on the type of housing, financial viability and the type of developer, suggesting that community-led schemes should be exempt. One respondent also suggested that tax payers and home owners should be contributing, rather than new development.

Written responses

SP Planning, on behalf of Lexadon Properties, stated that the council's approach to affordable housing contributions on small sites is in conflict with government policy, arguing that a small amount of contributions have been secured whilst the policy has been in place, given the time and resources that go into producing and reviewing viability assessments. They suggested that if contributions are to be sought from small sites, the council should adopt a simpler system, as the current system is cumbersome and slows the delivery of housing.

Another response, on behalf of Cashco, stated that Lambeth should follow government guidance, and as the written ministerial statement does not provide any circumstances where an alternative approach can be taken, it would be inappropriate to seek affordable housing contributions from small sites. They also commented that a requirement for affordable housing could prevent residential development on small sites from coming forward.

The Home Builders Federation commented that the council should follow the government's approach and exempt small schemes from contributing to affordable housing, as this would help to ensure delivery against the London Plan small sites target.

Indigo Planning on behalf of St Clair Developments, strongly objected to requiring small schemes of fewer than 10 units to contribute to affordable housing. They argued that the successful delivery of affordable housing requires scale and requiring small residential developments to provide affordable housing or be subject to lengthy and costly viability appraisals undermines the goal of the Housing White Paper and deters the much-needed homes.

The Brixton Society agreed that small developments should make a contribution to affordable housing where possible and objected to the practice of subdividing sites to avoid affordable housing contributions.

Statutory consultees

Wandsworth Council commented that while smaller schemes can contribute to affordable housing, the resources required to administer the process can be overly complicated and time-consuming.

The GLA stated that the Mayor has no objections to local authorities seeking affordable housing contributions from schemes with fewer than 10 units.

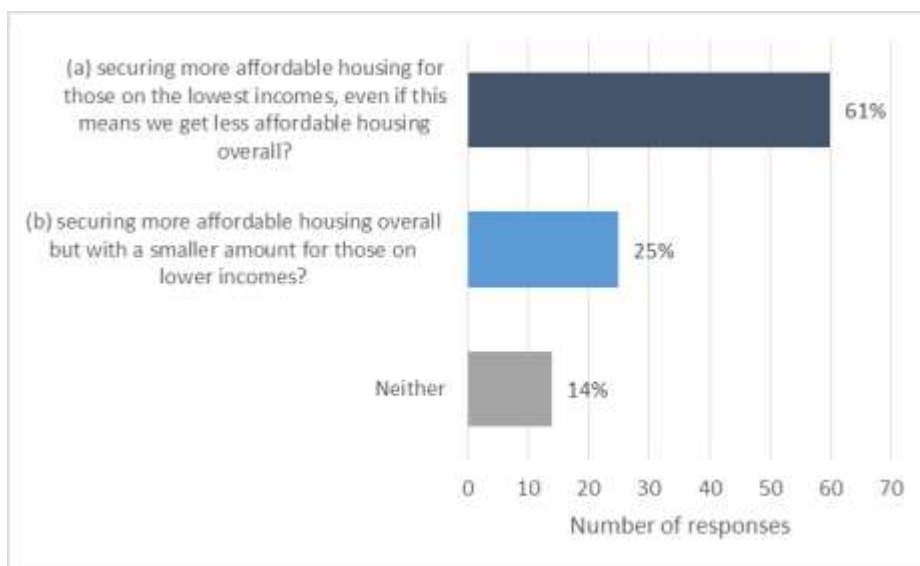
5. There are many different types of affordable housing, beyond traditional social rented accommodation, and eligibility is determined by household income. Newer 'intermediate' products for those on middle incomes include Discount Market Rent and options for affordable home ownership. We still need to make sure enough affordable housing is provided for people on the lowest incomes and there is concern that social rented housing will get squeezed out by the newer types of affordable housing aimed at middle income households. In new developments generally should the priority be:

(a) Securing more affordable housing for those on the lowest incomes, even if this means we get less affordable housing overall?

(b) Securing more affordable housing overall but with a smaller amount for those on lower incomes?

Survey responses

Option (a) - more social rented at the expense of overall affordable housing numbers was the most popular answer, with 61% of responses. Option (b) – more social housing overall but with less social rented was less popular, with 25% of responses.



12 respondents suggested that the lowest income households have the greatest need, have the fewest options and are most vulnerable and most in need of help. Two comments pointed out that more social housing was needed to make up for historic losses. Seven respondents raised the need for a socially diverse workforce and communities and to avoid people on low incomes having to move elsewhere. One comment suggested that public sector workers and those doing certain jobs should be supported to have homes in Lambeth and two respondents highlighted the need for mixed developments, with a mix of different types of affordable housing.

Four of the respondents who chose option (a) questioned or objected to the term 'affordable'. Two raised issues around the management of social housing and that tenants should be encouraged to move to out of social housing if their income increases.

Two people objected to the question. One respondent asked if the question was included because lower income households were less likely to respond to consultations. Another commented that it was a binary question for such a complicated issue.

Of the respondents who selected option (b) one planning consultant stated that it should be decided on a case-by-case basis but the overall need was for more affordable housing. Another planning consultant commented that the overall need was for more affordable housing and that targets for the proportion of intermediate and social rent should be flexible and recognise that there is a balance to be struck, due to the higher cost of providing social housing.

Two respondents who chose option (b) pointed out that middle-income workers, for example teachers and nurses, need more support to be able to afford to live in Lambeth. Another two comments suggested that increasing densities was important for increasing the supply of affordable housing and another suggested that building more housing generally would improve affordability.

One respondent who chose option (b) raised problems with the term 'affordable', in that it covers many tenures and prices. Another wanted more 'genuinely affordable' housing, not shared ownership or Pocket homes. One respondent commented that neither option is ideal, and that Lambeth needs to strike a balance to provide for both middle-income households, and those on a low income.

14% of respondents chose neither option. Two respondents suggested that both options were possible and two respondents suggested that it depends on the need of the local community. Other respondents argued it should be decided on a site-by-site basis subject to viability, deliverability and a location-specific need for affordable housing. One respondent argued that building more housing overall would reduce housing costs whilst another respondent commented that the question was unfair and leading.

Written responses

DP9, on behalf of ITV, commented that while affordable housing for those on the lowest incomes is important, there is still a need for intermediate housing and emerging policy should cater for a range of affordable housing types. NJL Consulting on behalf of Cashco commented that local needs for different types of housing should be fully understood and policy should be informed by evidence. They stated that it is not appropriate to apply a blanket approach, and that housing needs should be regularly assessed.

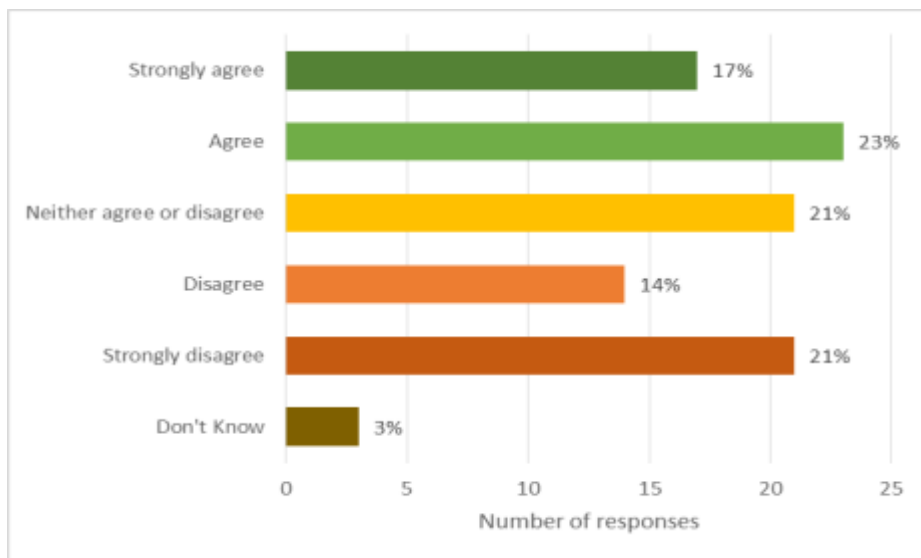
Statutory consultees

Wandsworth Council stated their preference for option (b) - securing more affordable housing overall but with a smaller amount for those on lower incomes.

6. Housing estate regeneration schemes in Lambeth are currently required to provide 50% affordable housing overall in the finished scheme. In some circumstances, there may be a case for allowing a lower proportion of affordable housing overall to secure a higher proportion of homes for those on the lowest incomes. However, this would never involve allowing an overall loss in the amount of affordable housing originally provided on an estate. In housing estate regeneration schemes, we should sometimes accept less than 50% affordable housing overall so we can deliver a higher proportion of affordable housing at council rents for those on the lowest incomes. To what extent do you agree or disagree with this statement?

Survey responses

A total of 40% of respondents strongly agreed or agreed that in housing estate regeneration schemes, the council should accept less than 50% affordable housing overall to deliver a higher proportion of affordable housing at council rent for those on the lowest incomes. 35% of respondents disagreed or strongly disagreed and 21% said they neither agreed nor disagreed.



Of those that agreed, three commented that those on lowest incomes or who are homeless have the greatest need, and it was essential to help. There were several more comments about the need for more council housing, and that council housing or social housing should take priority over other types of affordable housing.

Two comments suggested that more flexibility was needed regarding the provision of affordable housing. One comment referenced a scheme aimed at key workers that had additional affordable housing requirements, which the respondent did not consider appropriate.

Many of the comments from people disagreeing or strongly disagreeing with the statement were objecting to planned estate regeneration schemes and estate regeneration in general, with eight respondents objecting. Three comments suggested that social housing obligations were being avoided. Four comments in total expressed support for council housing, including two suggestions that 50% should be at Council rent.

One respondent suggested the proportion of affordable housing should be even higher on estate regenerations schemes, because the council does not have to buy the land, and the council should have to comply with the same affordable housing requirements as other developers. Another respondent commented that the council had obligations to replace lost social housing, and to increase the supply, as not enough homes will be delivered through the private sector.

There were two comments suggesting that it doesn't have to be an either/or situation: that the council should be pushing harder on this topic, should find more creative solutions, and consider a variety of partnerships and co-operatives.

One comment suggests the council should use policy to require more affordable housing whilst one respondent suggested that the issue of estate regeneration should be tackled as a community.

Of those that neither agreed nor disagreed, four respondents felt affordable housing requirements should be determined on a case-by-case basis. There were three comments objecting to estate regeneration in general, and another commenting that the proportion of affordable should be higher, suggesting 75%. One respondent questioned the definition of affordable at 80% of market value.

Of those who didn't know, one respondent stated that they didn't understand the question and others objected to estate regeneration, commenting that estates are being cleared of low income residents.

Written responses

The Brixton Society set out general objections to the council's estate regeneration programme and commented that achieving 50% affordable housing would only be possible through unsustainable increases in density. Referring specifically to Cressingham Gardens, they commented that a more sympathetic approach (including infill development, extensions and better maintenance) would be less disruptive and better value for money.

Statutory consultees

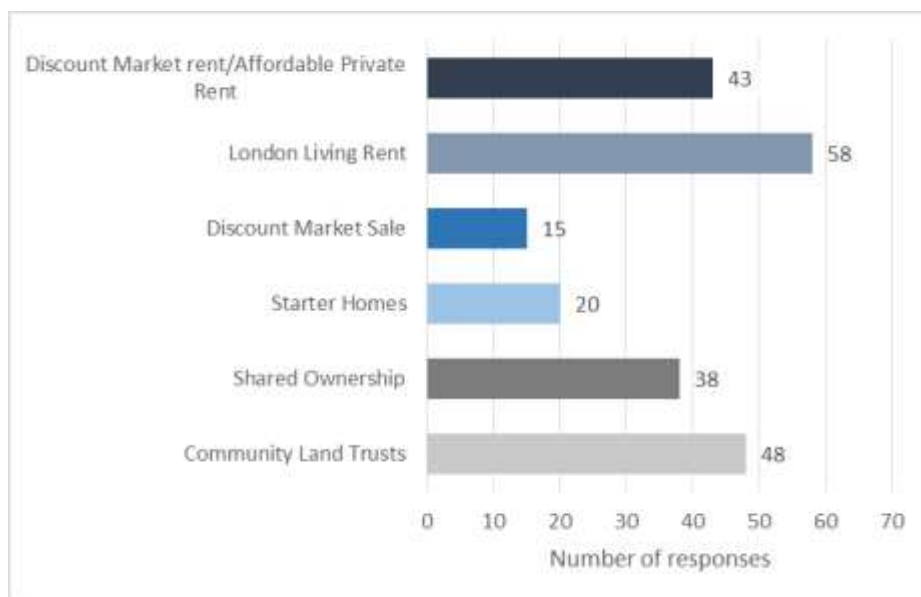
Wandsworth Council commented that the approach should depend on how Lambeth are expected to meet affordable housing targets. They also comment that Lambeth is in same strategic housing market area as Wandsworth, so they are seeking to ensure Lambeth is maximising the delivery of affordable housing.

The GLA, on behalf of the Mayor, stressed that estate regeneration should not lead to a loss of affordable housing and deliver an uplift where possible. Their response also references policy H10 of the draft new London Plan (Redevelopment of existing housing and estate regeneration).

7. 'Intermediate' affordable housing can help those on middle incomes find somewhere affordable to live in London. This often includes workers who provide essential services to the capital, such as teachers, social workers, fire fighters, nurses and police officers. Which of the following types of intermediate affordable housing should be prioritised? Tick the top three. Which of these types of 'intermediate' affordable housing for those on middle incomes should be prioritised? In your view what else could Lambeth do to support workers who provide essential services to the capital find housing they can afford?

Survey responses

In terms of prioritising intermediate affordable housing, London Living Rent was the most popular followed by Community Land Trusts. The least popular options were Discount Market Sale and Starter Homes.



Eight respondents who expressed support for Community Land Trust considered them to be genuinely affordable and a sustainable, long term solution. Two respondents raised concerns about affordable housing being lost to the open market, particularly in relation to Discount Market Sale. Two respondents also raised concerns about Shared Ownership occupiers and difficulties for families who are unable to move to larger properties when needed. However, other respondents argued that Shared Ownership has been proven to be successful in providing long term benefits and that Starter Homes, Shared Ownership and Community Land Trusts enable individuals and co-operatives to address housing needs.

Respondents who preferred Discount Market Rent/Affordable Private Rent felt it was the only intermediate product that doesn't push tenants into home ownership, offers more flexible tenancies and is the most similar to social housing. One respondent suggested that Discount Market Rent, London Living Rent and Community Land Trusts were the best options for allowing people to save up a deposit to buy their own home.

Two respondents raised issues around the concept of home ownership and more general problems with the housing market, with the emphasis on housing as an asset and the influence of Buy to Let and overseas investor purchases. Other respondents suggested that the council should consider rental models as seen in Europe and that housing should be more co-operative.

Two respondents questioned whether the examples of workers given were really 'middle-income' earners and whether affordable housing was their only option. Other respondents commented about the need for flexibility because of workers such as junior doctors who have to move regularly for work and the need to ensure options for up-sizing and down-sizing as circumstances change.

Four respondents commented that they did not know what the different options meant. Other comments expressed the importance of having a mix of uses in a development, and of people being able to live in the communities where they have grown up. Respondents also raised the following issues:

- Intermediate housing is a way for developers to avoid building genuinely affordable housing and more social housing should be built.
- The council should be removing the exploitation and profiteering of developers from the provision of housing.
- In a free market economy people can change their jobs if they don't earn enough.

Written responses

The Brixton Society commented that as the definition and models of affordable housing change often, Local Plan policy should not be too specific. They suggested that the Starter Homes model leads to small homes which buyers find it difficult to move on from, and suggested that Registered Providers are keen to promote the Shared Ownership model. They also expressed their support for Community Land Trusts.

Another comment, on behalf of ITV, stated that it would be inappropriate to specify which intermediate products should be prioritised in policy, and that policy should reflect the council's assessment of housing need and practical experience of delivery.

Cashco expressed support for the approach of helping essential workers. They also considered that it is not appropriate to prioritise particular products. They commented that it would be better to ensure a mix of types are provided to meet all needs, and that developments should be encouraged to provide a mix of housing.

Statutory consultees

TfL Commercial Development intends to deliver a range of intermediate housing on its sites which will encompass all of the tenures listed except starter homes. The mix of social and intermediate housing and range of tenures that TfL's partners will deliver will vary from site to site and will be informed by local housing needs and site-specific circumstances. The Mayor recognises that in some cases, Londoners want to shape and build development themselves and so he is supporting and funding community-led housing in London. There is an active local campaign in the borough for a Community Land Trust which TfL is seeking to support as part of its programme for delivery of affordable housing. The need for Community Land Trusts is particularly acute in high-value boroughs,

such as Lambeth, where affordable home ownership products are only accessible to a small group of people due to high land values. Community Land Trusts take the value of the land out of the cost of housing and are therefore most desirable in higher-value boroughs such as Lambeth.

8. In your view what else could Lambeth do to support workers who provide essential services to the capital find housing they can afford?

The most popular suggestion made by respondents was to build more social housing or council housing which was submitted by 16 respondents. Six respondents suggested building affordable housing specifically for key workers and five respondents expressed support for Community Land Trusts or other community-led housing. One respondent argued that it is a serious problem that needs further discussion, suggesting hospital cleaners are having to live in overcrowded conditions, for example.

One respondent who suggested tackling the issue of 'buy-to-leave' and foreign investors referenced Islington's policy to fine developers who sell properties to foreign investors who then leave them vacant. Several respondents suggested improving the financial situation of key workers. Suggestions included:

- Increasing wages by the council paying Living Wages to staff and lobbying government to increase public sector wages.
- Providing other forms of financial support, such as increased housing benefit for key workers or reduced council tax.

Four respondents suggested working with large employers and/or other public sector organisations to provide affordable housing. This included asking large employers of key workers (such as hospitals) to use their land for affordable housing, or providing support to employers who want to provide on-site affordable housing. Four respondents suggested better regulation of landlords, including prosecuting rogue landlords and having a register of approved landlords.

Two respondents suggested making better use of existing properties to provide more accommodation. This included not relying on new builds, relaxing restrictions on conversions to allow the community to provide more homes and relaxing the restrictions on extensions to allow households to extend their homes for rental accommodation.

Other suggestions included:

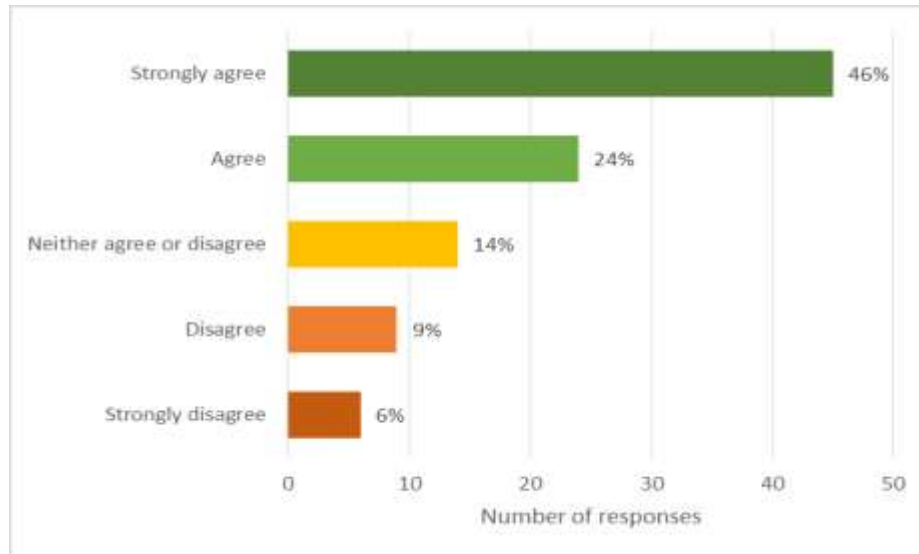
- Offering incentives to those who rent to keyworkers.
- Better regulation of developers.
- Redeveloping off-street parking as housing.
- Council tax re-band using current values, not 1991 values.
- Taxing wealth.
- Working more closely with the community
- Not subsidising employers who don't pay living wages.

Others respondents argued that Intermediate housing is not affordable for key workers and Shared Ownership does not offer enough flexibility. Some disagreed that all key workers are in need of support whilst others argued that key workers are more deserving of support through Intermediate housing than those on middle incomes.

9. The government thinks developments for private rented housing (also known as 'build-to-rent' housing) should only need to provide affordable housing for households on 'intermediate' incomes. We think in some cases developers can and should provide social rented units for people on the lowest incomes in this type of development. To what extent do you agree or disagree with our position?

Survey responses

Of the 98 responses, 70% of respondents strongly agreed or agreed that in some cases developers should provide social rented units in Build to Rent developments. 15% disagreed or strongly disagreed and the remaining 14% neither agreed nor disagreed.



Respondents who agreed or strongly agreed that developers should provide social rented units in Build to Rent developments commented on the high levels of need for social housing, the importance of keeping communities together, ensuring community cohesion and helping those on the lowest incomes. Some respondents felt that developers are not currently providing affordable housing and that the council should be more vigilant with developers' viability assessments.

Other respondents commented that social rented units should be kept for the purpose planned, tenants should take more responsibility for their properties and buying a home is not the best option for everyone, although renting does not offer the same security.

Of those who disagreed, two developers commented on the impact on deliverability of Build to Rent schemes. Savills, on behalf of Guys and St Thomas' Charity, argued that intermediate is easier to provide as it can be integrated throughout the development whereas social rent would have to be in a separate building and require a Registered Provider to be involved. HGH Planning suggested that variations to the Build to Rent model could threaten viability.

Two respondents suggested that more regulation is needed in order to build social rented housing and to maintain housing standards. Another respondent expressed concern that providing social rent within build-to-rent would provide a two-tier situation as social rented units could be built to a lower standard.

One respondent disagreed with the principle of social rented accommodation, arguing that people shouldn't be subsidising employers who don't pay enough to their workers and should only be provided for the most vulnerable, for example disabled people. On the other hand, another respondent felt that more emphasis should be put on people on lower incomes.

Respondents who neither agreed nor disagreed provided the following comments:

- It depends on the viability of the scheme.

- Developers should make contributions despite the different tenures.
- It would be better for local authorities or registered providers to build social housing as standards would be higher.
- Providing social rented homes in build to rent developments would not offer the security needed by those on the lowest incomes.
- It would create a two-tier system.

Written responses

The Brixton Society commented that the policy needs to be more specific to allow more certainty for developers. A comment submitted on behalf of Cashco suggests that the type of affordable housing delivered should meet local needs, and that government policy should be reflected in local policy to ensure there is no conflict.

A comment, on behalf of R&F Properties, stated their general support for Build to Rent as a way to provide for the changing demographics and lifestyles of residents, and to increase the delivery of housing.

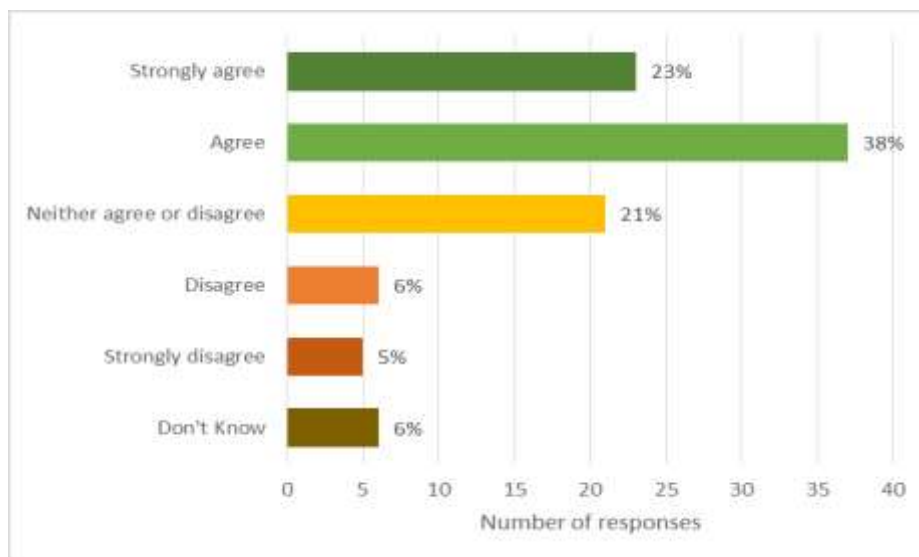
Statutory Consultees

Wandsworth Council agreed with this approach, depending on viability assessments.

10. Our evidence suggests the need for smaller affordable housing units with two bedrooms will increase over time. Local Plan requirements for different sizes of affordable housing should be amended to reflect this evidence. To what extent do you agree or disagree with this statement?

Survey responses

61% respondents strongly agreed or agreed that the Local Plan requirements for different sizes of affordable housing should be amended to reflect the evidence that the need for smaller affordable housing units with two bedrooms will increase over time. 21% said they neither agreed nor disagreed. 11% respondents disagreed or strongly disagreed with the remaining 6% didn't know.



Five respondents who agreed or strongly agreed commented that the policies should reflect the evidence and a further two commented that families are getting smaller. One comment noted that since smaller units were cheaper to provide, it could lead to increased delivery rates.

Other respondents suggested that there should be flexibility and a variety of unit sizes should be provided to meet the needs from changing circumstances. One respondent acknowledged the need to maximise delivery, especially of affordable units, but warned about requirements changing over time. Another commented the requirements would need to be regularly reassessed.

Two respondents were concerned about space standards in new build flats. Another respondent commented that Lambeth Local Plan Policy H6 (residential conversions) is forcing residents to keep their family-sized homes and questioned the affordability of such family-sized homes for local residents.

Of the respondents who disagreed or strongly disagreed, two expressed doubts about the evidence and basing decisions on projections rather than current supply and demand. Three commented that there is still a requirement for a range of sizes, including for family-sized homes. One commented on the danger of producing a 'mono-culture' and the need for a mix of uses.

Of the respondents who neither agreed nor disagreed with the approach or didn't know, there were several comments expressing doubts over the evidence, including the reliance on long-term projections rather than market demand at the time. One respondent queried the evidence that shows a percentage mix rather than absolute numbers. Several others commented on the need for a range of units sizes, including larger units, especially in the case of immigrant families. Other comments raised the following issues:

- All development should be built to Lifetime Home standards.
- Stopping the 'bedroom tax' would reduce the need for two-bedroom flats.
- Over population is causing pressure on housing in the short-term.

Written responses

The Brixton Society commented that two bedroom units already appear to predominate, and questioned whether more two bed units would be at expense of smaller units or larger units. They pointed out that changing the demand for larger units would affect demand for amenity space and the resulting built form.

One response, from ITV, commented that policies should be flexible and allow for changes in mix and sizes of affordable housing according to need. A response on behalf of Cashco suggested that a range of affordable housing types should be provided, and suggested that the types of homes required should be flexible and reflect assessments of needs. Indigo Planning on behalf of St Clair Developments, commented that the amendment of unit mix requirements to be in agreement with this evidence is supported. The final comment, on behalf of R&F Properties, stated their general support for smaller units as a way to provide for the changing demographics and lifestyles of residents, and to increase the delivery of housing.

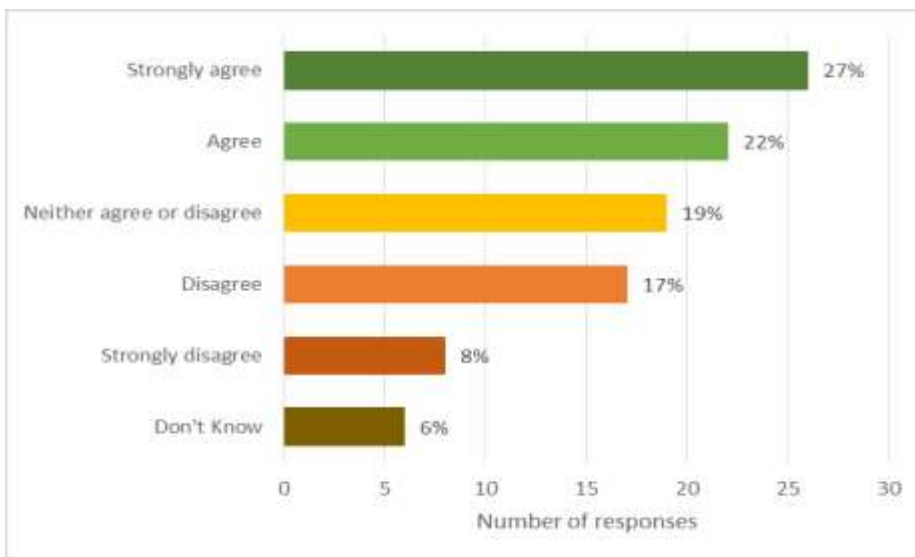
Statutory consultees

Wandsworth Council agreed with this approach.

11. The current Local Plan does not require affordable housing for the wider population in student housing developments. Developments involving specialist student accommodation should be required to provide some affordable housing to help meet wider housing need in the borough. To what extent do you agree or disagree with this statement?

Survey responses

Almost half of respondents agreed or strongly agreed that developments of specialist student housing should provide affordable housing. 19% said they neither agreed nor disagreed. 25% disagreed or strongly disagreed with the approach and 6% said they didn't know.



Of the respondents who agreed or strongly agreed, four noted that student accommodation is very profitable and should be contributing to affordable housing, particularly given the need for affordable housing and the lack of community benefits from student accommodation. Two respondents suggested there is enough student housing already and that general affordable housing was needed more. One of these respondents also argued there was a need for affordable student accommodation and three respondents commented that much of the existing student accommodation is aimed at wealthy students.

On the issue of having affordable housing on the same site as student housing, comments were mixed. Positive comments included:

- Students should not be ghettoised.
- It is nice to have students around.
- A mix of housing is a good thing.

However, some respondents questioned whether having affordable housing on the same site as student housing would work, particularly with students next to families and suggested that most people would dislike living in a student housing complex.

Of the respondents who disagreed or strongly disagreed, three respondents argued that the cost of an affordable housing contribution would be passed on to students. Four respondents suggested that student accommodation had different requirements from the general community and should remain separate. Three respondents felt that the focus should be on providing affordable accommodation for students.

Other comments questioned if more student accommodation was needed in Lambeth whilst another suggested that there is a demand for serviced student-style accommodation for apprentices or trainees that is not being met.

Of the respondents who neither agreed nor disagreed, some believed that universities should be providing student accommodation, rather than the council. Of those who didn't know, two respondents said they didn't have enough knowledge to comment whilst another doubted that families would want to live amongst students.

Written responses

Brixton Society suggested that the current lack of affordable housing requirement incentivises development of student housing so introducing such an obligation may mean less student housing in future. They also commented that it might not be practical to include affordable housing on-site but a financial contribution towards off-site provision would be welcome.

Statutory consultees

Wandsworth Council commented that student housing should be required to deliver affordable housing where it is viable, but only where accommodation is not tied to an educational establishment.

The GLA, on behalf of the Mayor, referenced draft London Plan policy H17, which seeks at least 35% of Purpose Built Student Accommodation to be secured as affordable student accommodation.

12. Do you have any other comments?

14 respondents provided other general comments in relation to the Affordable Housing survey which can be summarised into the following issues:

- Support for Community Land Trusts.
- There is a need for more housing generally and social housing in particular.
- Councillors should be working to get a Labour government and more funding for council housing.
- The north of the borough needs more affordable housing options.
- The council takes a more relaxed approach with its own planning applications.
- The council needs to take a harder line with developers.
- There are currently too many flats in tall buildings and densities are too high.
- Policy H6 of the Local Plan is preventing communities staying together and being able to afford homes in their area. The current Local Plan was not discussed with residents and the process is not democratic.
- Concern about increased light pollution from flats.
- Concern about empty properties.
- The consultation should have been better promoted.
- Keep green spaces and thanks to the council for planting trees.
- Stop local people being moved out.
- Increase and update council tax bands.
- Build on unused open spaces near existing housing

Written responses

The Home Builders Federation suggests that a 50% Affordable Housing target would be difficult to sustain and that the council should consider the viability of any proposed target. They commented that Local Plan policies will need to be very clear to ensure certainty for applicants and suggested that the required tenure mix of affordable housing should be clearly set out, and tested for viability.

The Brixton Society suggested that the main need locally is for affordable rented accommodation for families. They also commented that it is no longer acceptable for developers to claim that they cannot afford to make any contribution to affordable housing, and any proposals offering less than the target amount should be subject to a viability assessment. They noted that while London Plan targets are being exceeded in terms of permissions granted, the number of affordable dwellings is low. They also objected to increasing housing densities where there is little contribution to local housing needs.

DP9, on behalf of ITV, stated that they strongly agreed that requirements for affordable housing do not need to be at the expense of the scheme's viability and that the right balance of uses needs to be achieved, such as the inclusion of affordable workspace.

Consultation session with Registered Providers

Meeting – Lambeth Local Plan Review consultation session with Registered Providers of Affordable Housing
Phoenix House, Lambeth 06/11/2017 10-11:30am
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer), Tom Tyson (Strategy and Policy Manager), Andy Radice (Social Housing Liaison Manager), Hitesh Patel (Social Housing Liaison Officer) Registered Providers – Paul Yianni (Network Homes), Chris Lyons (Peabody), Elizabeth Agyepong (Optivo), Rachel Ferguson (Metropolitan)
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017. One survey relates specifically to affordable housing. Council officers stated that the purpose of the meeting was to have a focussed discussion with representative from Registered Providers (RPs) on some of these questions. Individual responses from RPs would still be welcome. RPs confirmed that they had all received details of the consultation in advance of the session. A summary of the findings from the Lambeth Strategic Housing Market Assessment 2017 was also presented.
General comments made by RPs Network Homes advised they are not aware of any major issues they are experiencing with the planning process at the moment. Metropolitan raised issues for schemes on smaller sites, due to the logistics of getting an s106 agreement in place and the time it takes to receive pre-application advice. They also raised concerns that policies are being applied more rigidly on smaller sites than on strategic sites where more of a balance is taken. An example was given where they had a site that was formerly a care home but wanted to develop the site for 100% shared ownership and they were required to include social or affordable rent to meet the tenure split required by policy; but they believed that other developers would have come forward with no affordable housing on the site. Metropolitan advised that they would rather be providing the social or affordable rent through their larger estate schemes. Optivo advised that Wandsworth have a development manual but is not sure how effective it has been as developers can keep changing and re-appraising a schemes and it can be quite labour intensive for an RP if they are not going to end up delivering the scheme. RPs advised that it is easier in their own schemes to bring forward policy compliant schemes but feel they get pushed further on affordable housing than other developers. It may also be the case that they are delivering policy compliant levels of affordable housing on schemes across a whole programme but the council assesses them against policy on a site by site basis. RPs advised that they don't currently have any schemes that are at London Living Rent but they are not against this in principle. RPs also advised that if there were areas to be designated as Opportunity Areas, it would be good to think about affordable housing in these areas in advance and the affordability of different products.

Viability

The RPs advised that viability appraisals are showing down the process, particularly when they know that other developers would be providing no affordable housing on these schemes. Peabody asked whether there was potential for a route RPs can take when they are overproviding affordable housing rather than having to go through lengthy viability discussions.

RPs felt that with the Mayor's 35% threshold, there may be less opportunity for local authorities to maintain their policies and own targets.

Metropolitan advised they have worked on a couple of schemes that have been referred to the Mayor since the SPG has been adopted and find that the Mayor's viability team are taking a more pragmatic approach to assessing some elements of the viability appraisal if they know it will not have a big impact on the scheme whereas local authorities spend a lot of time going into detail on all points.

Metropolitan advised that the current approach to review mechanisms may not work on bigger sites. For example, Clapham Park has a 17 year build programme and in these circumstances a review mechanism every 5 years may not work.

Mix of units

Optivo advised there is difficulty in people being able to afford 3 or 4 bed properties due to the costs associated with council tax and service charges and have considered whether they should just be offering 1 or 2 bed properties. The council tax bands for 3 or 4 bed properties are not affordable for people on benefits and people who work part time will also struggle. Peabody confirmed they have also had this problem.

RPs advised that Tower Hamlets and Greenwich are very clear in policy about what they require and set out the rents for larger units. This gives more flexibility for smaller units and means that the RPs are working within these parameters.

Intermediate products

Optivo advised that there needs to be a balance between the split between social/affordable rent and intermediate products as people do wish to own their homes so there needs to be a route available for this. They consider that 70:30 is probably the most appropriate tenure split for affordable housing in Lambeth.

Network Homes advised that shared ownership often now only works in some areas but it might not be the case if values keep increasing as these units are on the verge of affordability at the moment. It is also important to consider the unit mix because 1 and 2 beds may work but 3 and 4 beds may not.

Peabody advised that developers find shared ownership the most comfortable product for them but may not work for the RP who has to sell the units. They try to work with developers as early as possible, especially in high value areas, to work out whether they can afford the intermediate products and also what type of products will work for both them and the developer.

RPs advised they would find it useful if the local plan could set out the types of intermediate products the Council wants but that needs to be done in the context that values will change across the borough and that will impact on the type of products that work on schemes. Some boroughs are good at setting out the strategic aims of what they want and developers then know that if they don't want to work within those parameters they will move on from working in that borough.

RPs advised that Westminster have very clear s106 agreements outlining what the intermediate products will be, with specified unit numbers within different income brackets.

Build to Rent

Network Homes advised they are working on a Build to Rent scheme with discount market rent. RPs advised that they see less value in Build to Rent and it is possible to reduce the amount of affordable housing in the schemes. However, they felt they would be in a better position to judge the schemes once they have tenants living in one. RPs advised that some developers are switching their schemes over to Build to Rent. For example a developer may have two blocks and one is then sold off to a PRS provider as this reduces the risk of the scheme but it might take longer before developers are building these sites themselves.

Peabody advised they need more time to assess whether they want to invest in these schemes and how they should be managed. If they did work on a scheme it would be in a single block on a larger development.

RPs advised that they would still want to secure low cost housing within these schemes but the management depends on the number of units within a scheme and whether there is critical mass.

Student accommodation

RPs advised that Barnet had not gone down the route of requiring traditional affordable housing within student accommodation. It may work if there is a big site and you could split it to provide two different types of accommodation. There will also be an issue of service charges and it may be best to go down the route of off-site provision.

Housing for older people

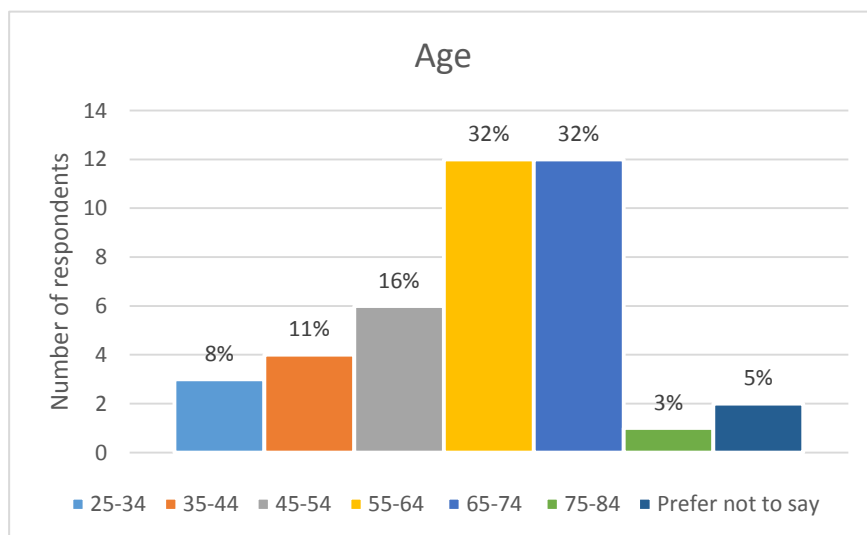
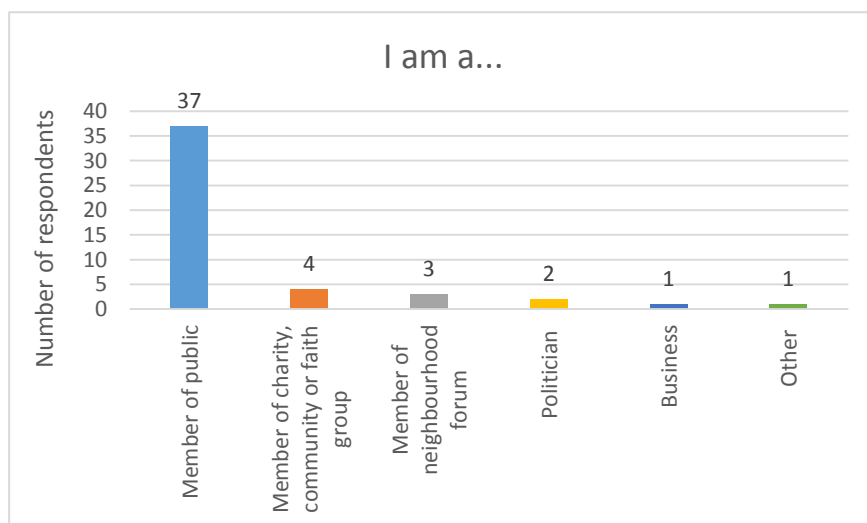
RPs raised concerns as to whether people want to downsize into higher density schemes. They advised that it may be a generational issue and that the next generation may want to move back into London or downsize into these schemes. They advised that people don't necessarily want to be in a block with just people over the age of 55 and questioned whether the demand was there. They advised it may work as part of a wider regeneration scheme to create a balanced community within the scheme.

3.6. Housing for older people

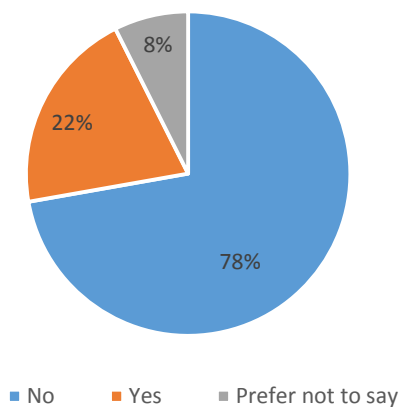
In response to the 'Housing for Older People' survey, 40 survey responses were received. A total of 5 written responses, including statutory consultees, was received.

Survey responses

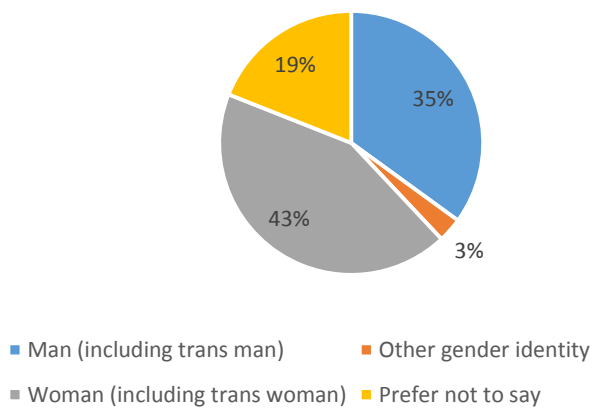
- The majority of responses for the Housing for Older People survey identified as being members of the public. Four respondents identified as being a member of a charity, community or faith group, three identified as being a member of a neighbourhood forum and two identified as being a politician. One respondent identified as being a business and one identified as 'other' but did not specify. It should be noted that some respondents identified as belonging to more than one category.
- The majority of respondents identified as being over aged 45 or over, with 16% identifying as being 45-54, 32% identified as being 55-64 and 32% identified as being 65-74.
- 37 survey respondents provided an answer to whether they or anyone they lived with had a disability, with the majority of respondents answering no to the question (78%).
- 43% of respondents identified as being a woman (including transwoman). 35% identified as being a man and 3% identified as being another gender identity.
- The majority of Survey responses came from respondents who identified as being White British. Two responses were received from respondents who identified as having another White background and one respondent identified as being Black or British Caribbean, Gypsy or Irish Traveller and White Irish.



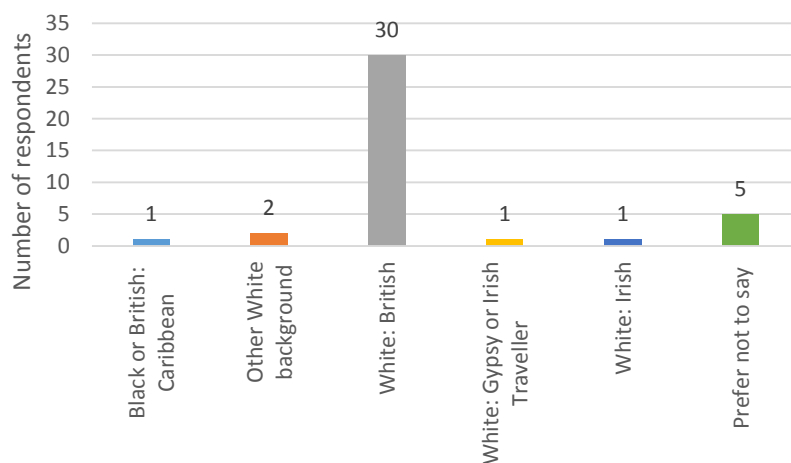
Do you, or anyone you live with, have a disability?



Gender



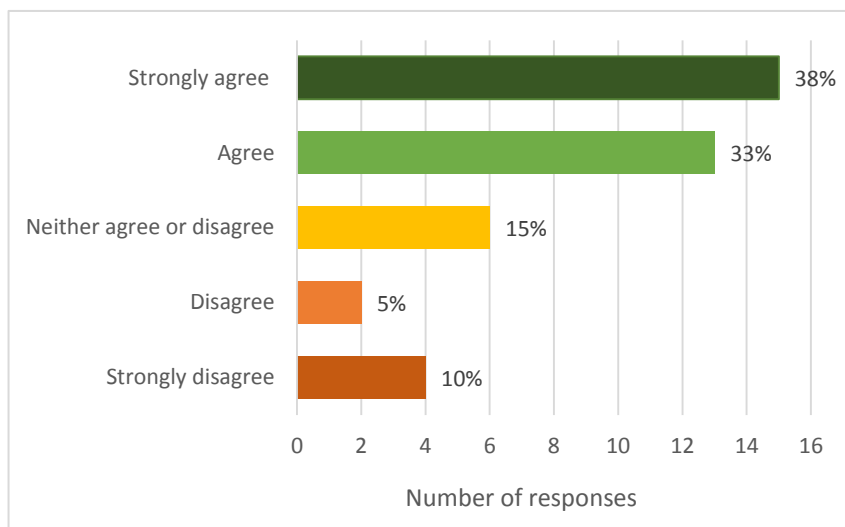
Ethnicity



1. We should support specialist retirement housing for sale to encourage more affluent older people to downsize to smaller accommodation if they want to, to release larger family-sized homes. To what extent do you agree or disagree with this statement?

Survey responses

Of the 40 responses to the question received, the majority supported specialist retirement housing for sale to encourage more affluent older people to downsize to smaller accommodation with 38% respondents strongly agreeing and 33% agreeing. 10% strongly disagreed, 5% disagreed and 15% neither agreed nor disagreed.



Of the respondents who strongly agreed or agreed with supporting specialist retirement housing, two respondents suggested there needs to be a change in attitude before people want to downsize as they have lived in their homes for many years and there needs to be support available. Two respondents raised concern that there is a loss of experience and contribution to local communities when older people leave London and London should be able to cater to the needs of people as they get older to allow people to stay in their community if they wish to. One comment supported the proposal as it would be less expensive for older people to run homes if they could move to residences of the same quality whilst another thought it is a good way of providing family homes for younger people.

Of the respondents who neither agreed nor disagreed, one said that they often see “retirement properties’ which are cheaper than normal but they do not understand what types of mortgage are available. One respondent questioned whether affluent people would necessarily move to specialist requirement housing and another stated that there are very few opportunities to downsize. One respondent is in the position of wanting to downsize their existing home by converting it into flats to then occupy the ground floor flat but is unable to do this based on the current planning policy.

Of the respondents who strongly disagreed or disagreed, one comment said that people cannot be forced to sell their homes as they are full of memories for them and their families to enjoy. One respondent stated that there is nothing to stop people downsizing to smaller homes now but another questioned whether there is sufficient sheltered housing available. One respondent argued that the council wants people to live independent lives and stay in their homes but it not possible to convert their homes into more suitable accommodation due to the lack of exceptions in Local Plan Policy H6.

Written responses

The principle of retirement housing being provided for sale or on a shared ownership basis was supported by Brixton Society.

Statutory consultees

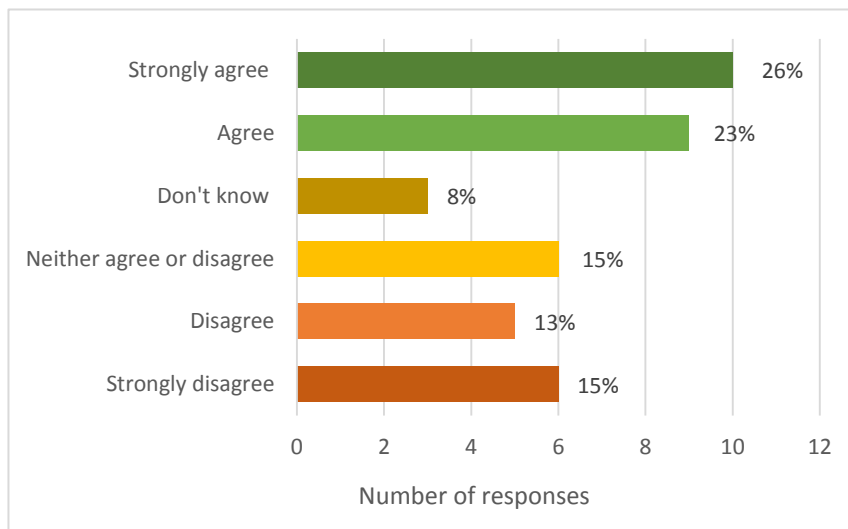
The GLA commented that the draft new London Plan contains a new, dedicated specialist older person policy (H15) but some older persons housing will be considered C3 which relates to sheltered accommodation and extra care accommodation. The GLA argued that this is to enable the provision of affordable, accessible and inclusive design housing for older persons.

Wandsworth Council supported the release of larger homes and commented that it is a long-standing approach in Wandsworth. It occurs by offering incentives to move out of larger former council properties and providing 1-bed and smaller units to move into. Wandsworth commented that it does not have to be specialist accommodation, which can be expensive, and 'extra-care housing' may be a solution and help to achieve mixed and balanced communities. However, Wandsworth argued that there is a need to secure this type of housing units in the correct locations, with good access to local services and to consider mechanisms to ensure that retirement homes for sale are targeted at people downsizing from larger homes in the borough.

2. Providers of specialist housing for older people argue they should be granted exemptions from normal contributions to affordable housing and infrastructure as they cannot compete with general needs housing for available land (because general needs housing generates higher values). To what extent do you agree or disagree that we should grant exemptions?

Survey responses

Of the 39 responses to the question received, almost half either agreed or strongly agreed that providers of specialist housing should be granted exceptions from contributions to affordable housing and infrastructure. 15% neither agreed nor disagreed and 8% of respondents said they didn't know. 13% disagreed and 15% strongly disagreed.



Of the respondents who strongly agree or agree that providers of specialist housing for older people should be exempt from contributions to affordable housing and infrastructure, two respondents agreed it was a good way to encourage developers to build housing for older people. One respondent commented that the exemptions should only be allowed for housing associations rather than private developers whilst another argued the exemptions should only be allowed if the developers continue to provide this type of housing in the future.

Of the respondents who neither agreed nor disagreed, one stated that older people aren't necessarily poor whereas another comment argued there should be affordable provision in all developments to create a mixed community. Of the respondents who said they didn't know, two respondents said they either didn't understand the question or didn't have the knowledge to answer.

Of the respondents who strongly disagreed or disagreed to an exemption to contributions to affordable housing and infrastructure, four comments argued that all developers will argue they can't afford it, although all housing is profitable so they shouldn't be allowed to evade their obligations. Two respondents said that older people also need affordable housing and that there is a risk of only providing specialist housing for wealthier older people which means other people may be forced to move out of the area. One respondent questioned what the exception is for as the costs for this type of housing will similar to that of a new build. They suggested that one solution would be for banks to extend interest only mortgages so people can continue to stay in their homes.

Written responses

The Home Builders Federation recommended that older people's housing is exempt from providing affordable housing on-site as this type of housing operates in a very different way to conventional housing, with costs such as long term care and management costs. They went on to recommend that providers of this type of housing should be allowed to make payments-in-lieu towards affordable housing off-site. Brixton Society also supported a reduced rate of contributions to affordable housing from sheltered housing or retirement housing but recommended that CIL contributions remained at similar levels to conventional housing because this type of development will place demands on the health service and public transport.

Statutory consultees

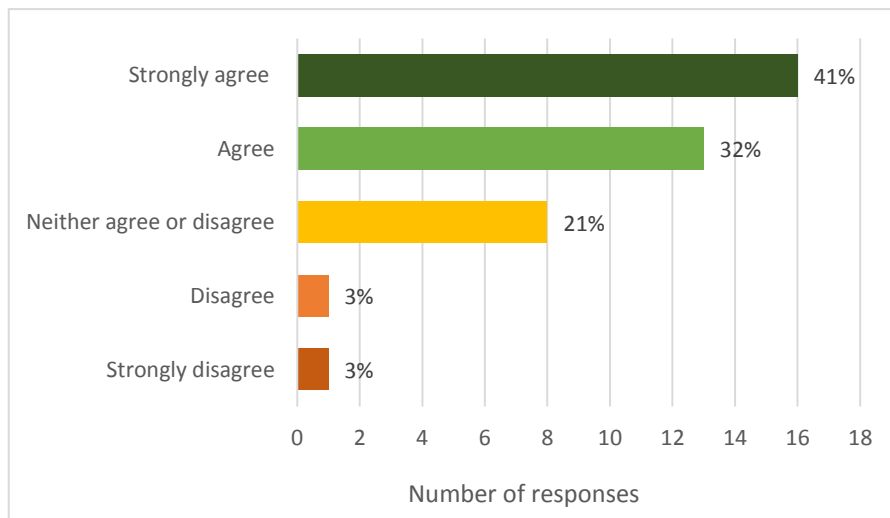
The GLA commented that the Mayor will expect specialist older persons housing (sheltered accommodation and extra care accommodation), which is considered C3 in the draft London Plan, to provide affordable housing in line with the draft London Plan affordable housing policies. The tenure split requirements may differ from draft London Plan policy and should be set out in Development Plan Documents or supplementary guidance.

Wandsworth Council generally agreed with exemptions but commented that it depended on the type of accommodation and its use class and the outcome of the London Plan. They argued that some specialist retirement housing is 'high end' where you purchase care as and when but essentially pay a market rate for a property along with service charges and this type of housing provides a choice of housing to those who can afford it but may not always be justified for subsidy or exemptions. There may also be an impact on Lambeth's need for affordable Older Persons housing needing to be met in Wandsworth.

3. We should encourage more semi-communal living as a way of preventing loneliness and isolation among older people. To what extent do you agree or disagree with this statement?

Survey responses

Of the 39 responses to the question received, the majority strongly agreed or agreed more semi-communal living should be encouraged as a way of preventing loneliness and isolation among older people (73%). 21% of respondents said they neither agreed nor disagreed and 6% either disagreed or strongly disagreed.



Of the respondents who agreed or strongly agreed, three comments supported semi-communal living as it can reduce the burden on the health service and also has benefits for people's quality of life and health and wellbeing. Two respondents suggested that the council should look at a co-housing model rather than retirement living and that cluster housing and communal areas should be encouraged with an emphasis on independent living. One of these comments gave an example of Homeshare which is successful in major cities such as Paris where there is a combination of older people needing help and/or company and younger people needing somewhere affordable to live.

Two respondents suggested that semi-communal living should be offered to those who would appreciate this kind of living and should be done sensitively so people don't have to join in if they don't want to. One respondent stated that a conversion into two flats for grandparents and grandchildren is not currently possible in their road whilst another respondent commented they don't want to move but want to downsize by dividing their house into two apartments. Their comments suggested this could be a way of older people continuing to live independently and could provide an opportunity for younger occupants to participate in some care of the elderly occupants.

Of the respondents who neither agreed nor disagreed, one suggested that they would only consider if they can share with people of similar interests, for example vegans. They suggested that older people who live in larger properties should rent out their rooms to younger people for a discounted rent for companionship and any semi-communal living should be on the ground floor. Two respondents stated that this type of accommodation shouldn't be an excuse to remove older people from their homes and questioned whether this is what older people want or whether the council is just trying to reduce their bills. One respondent was not sure what is meant by semi-communal living but suggested there is probably a need for 'McCarthy Stone' properties whilst one argued that it should be for families and not the state to provide for their loved ones. Two respondents said this type of living would suit some people and not others.

Of the respondents who disagreed or strongly disagreed, one suggested that the older generation should choose how to live and not be encouraged into something. Another argued that it is a patronising approach to alleviating loneliness and forcing people into more communal living is not a solution.

Written responses

The Brixton Society commented that sheltered housing schemes offered higher levels of support to residents 30 to 40 years ago but this has been scaled back and communal facilities have been closed or neglected which the Society put down to lack of funding rather than issues with the original designs or standards.

Statutory consultees

Wandsworth Council did not raise any strategic issues but noted that the approach seems to work well for student type accommodation and for younger professionals.

4. Do you have any other comments?

Survey responses

Seven people provided general comments relating to housing for older people. The comments provided by these respondents can be summarised as the following:

- Consideration should be given to co-housing as older people have many skills and experiences that would make them ideal candidates for this model of housing and would reduce loneliness.
- Residents don't know who to go to for housing assistance if they became disabled and would prefer to live independently than in a care home.
- Dispensations should be made to regressive planning laws to enable people to stay in their own homes.
- There is a lack of accessible housing in general.
- Owner occupiers and tenants who live in housing too large for their needs should be encouraged to move to smaller housing but it doesn't necessarily need to be specialist housing for the elderly.
- Existing care homes should be protected, particularly as they are also local employers.

- More affordable sheltered housing schemes are required in the future and should be delivered through Community Land Trusts and Co-operative schemes.

Written responses

The Home Builders Federation set out that increasing the supply of older peoples' housing is a national planning priority and that the draft new London Plan sets Lambeth an indicative benchmark of 70 units per year compared to the existing target of 75 units per year. The Home Builders Federation recommended that this target is reflected in the new Local Plan and that a policy is introduced which provides presumption in favour of development of land for older peoples' housing if the council has failed to meet the benchmark target in the previous year. The council should also report on the number of units of older peoples' housing it has provided each year in its Annual Monitoring Report and should also be aware that the draft new London Plan equates one bedroom of older peoples' housing to one dwelling of conventional C3 use.

One respondent questioned whether anything was being done to accommodate the growing elderly population in the plan and whether the plan addressed assisted living and accommodation for the elderly.

Statutory consultees

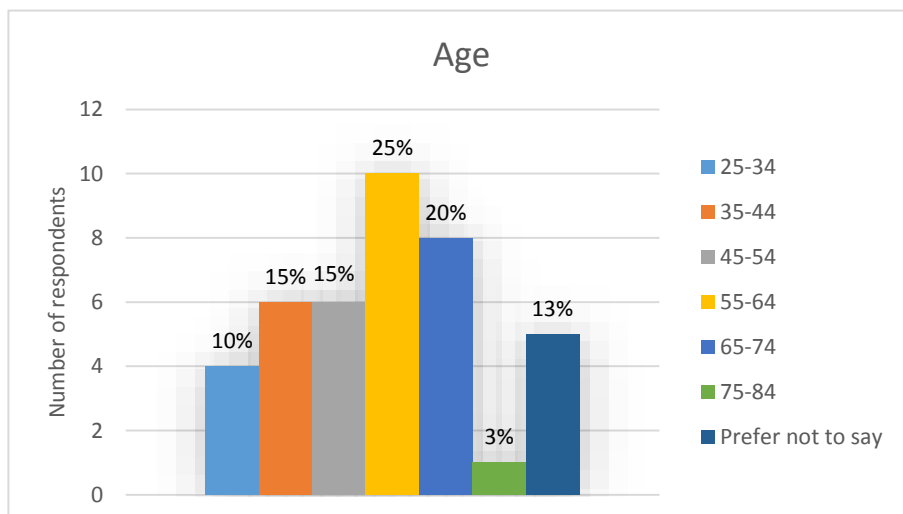
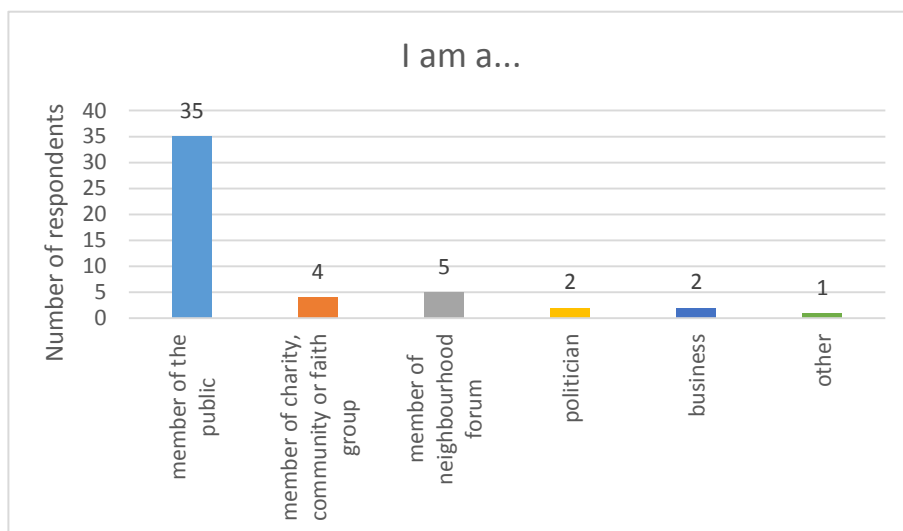
Wandsworth Council stated that Lambeth falls within the wider Wandsworth housing market area. The recent rise in over 50s or over 55s-only private accommodation (usually with options to buy in care as required) tends to be marketed as specialist accommodation but operates in the open market and so there is an argument it should be treated as any other private C3 use whereby CIL and affordable housing should apply. Wandsworth notes that nationally "older people's housing" can include "newer models of 'co-housing' for older people, with some form of mutual ownership and shared communal spaces" and "specialist private retirement housing for older people" but these are generally for over 55s in London, not those at retirement age and don't require referrals and are just private housing with age-only restrictions on occupations. Wandsworth also argued that there are implications for achieving mixed and balanced communities.

3.7. Self-build and custom build housing

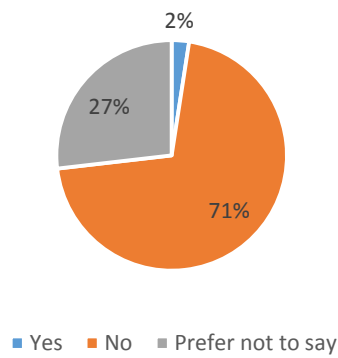
In response to the 'Self-build and custom build housing' survey, 40 responses were received. A total of 3 written responses, including statutory consultees, was received.

Survey responses

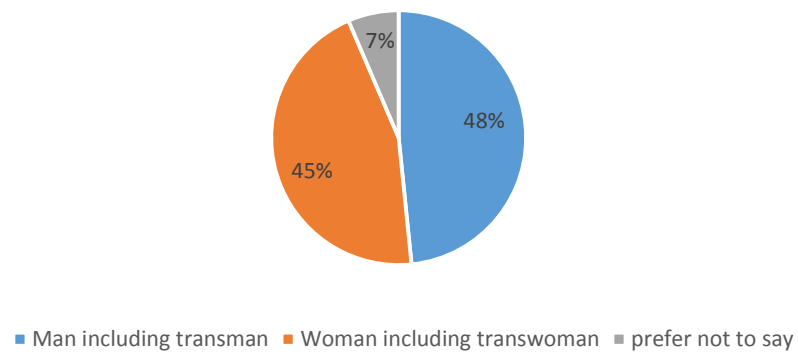
- The majority of responses for the Self Build and Custom Build survey identified as being members of the public. Four respondents identified as being a member of a charity, community or faith group, five identified as being a member of a neighbourhood forum and two identified as being a politician. Two respondents identified as being business and one identified as 'other' but did not specify. It should be noted that some respondents identified as belonging to more than one category.
- The majority of respondents identified as being over aged 45 or over, with 15% identifying as being 45-54, 25% identified as being 55-64 and 20% identified as being 65-74.
- The majority of respondents answering the survey identified as not having a disability or living with anyone who has a disability (71%).
- The majority of Survey responses came from respondents who identified as being White British. Five responses were received from respondents who identified as having another White background and one respondent identified as being Black or Black British African Somali, and Gypsy or Irish Traveller.
- 48% of the respondents identified as being a man (including transman) and 45% identified as being a woman (including transwoman). 7% preferred not to say.



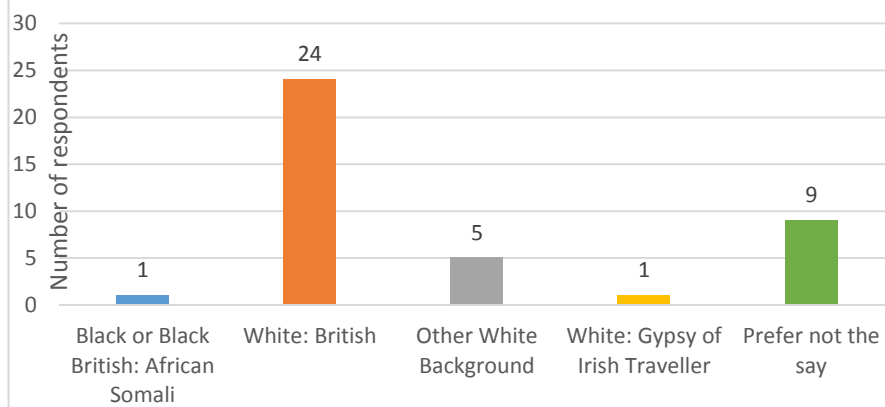
Do you, or does anyone living with you, have a disability?



Gender



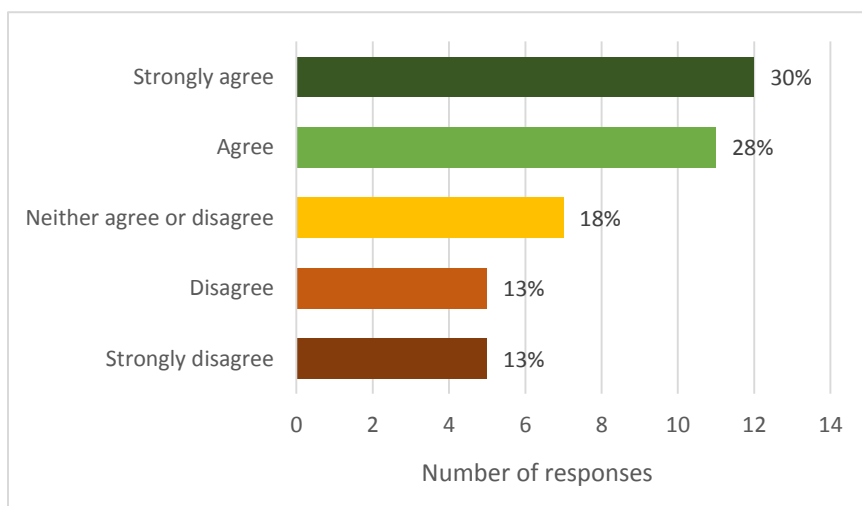
Ethnicity



1. Lambeth's Local Self-Build Register indicates a high level demand for plots of land for self-build. However, as there is currently no limit to the number of registers an applicant can apply to, and no requirement for applicants to verify their ability to purchase and develop a plot if one is provided, there is a considerable risk that the register may significantly overstate actual demand. Lambeth's Local Self-Build Register does not currently require applicants to demonstrate either a local connection to the borough or adequate financial resources to purchase a self-build plot. Plots for self-build and custom house building should only be available to people with a local connection to Lambeth Borough (for example people who already live or work in the borough, or have a family connection). To what extent do you agree or disagree with this statement?

Survey responses

Of the 40 respondents who answered the question, 58% either strongly agreed or agreed that plots for self-build and custom house building should only be available to people with a local connection to Lambeth. 26% of respondents either disagreed or strongly disagreed. 18% neither agreed nor disagreed.



Respondents who agreed or strongly agreed provided the following reasons:

- It strengthens local communities.
- It discourages developers and improves opportunity for local people that genuinely want to stay and reside in Lambeth, rather than developers who will build and move on. It reduces the risk of speculation by 'residents' who don't intend to reside in the borough therefore not meeting a local housing.
- It's common sense.
- It's about offering local residents the opportunity to improve the range of housing stock to enable them to remain in the local community. They will support local employment and likely give back to the community through their self-build project.

Of the respondents who disagreed or strongly disagreed, three respondents argued there should not be discrimination to people outside of Lambeth whilst others suggested that people should have a local connection to London but requiring a local connection to just Lambeth is restrictive. It was also suggested that the selection of people for plots should be based on need and should not be sold for profit for ten years.

One respondent who neither agreed nor disagreed suggested that people may have various links to the borough, for example family or schooling.

Written responses

The Brixton Society do not attach much value to the register as an indicator of demand but do consider that it should be open to residents of adjoining boroughs also given that borough boundaries are not always well-defined and family and community links often extend well into neighbouring districts.

Statutory consultees

Wandsworth Council suggested that the council could consider requiring applicants to demonstrate a local connection or have adequate resources to be able to purchase a plot. However, they believe there are no large areas of unused, underused or cleared land in Lambeth that would provide an immediate opportunity to create serviced plots.

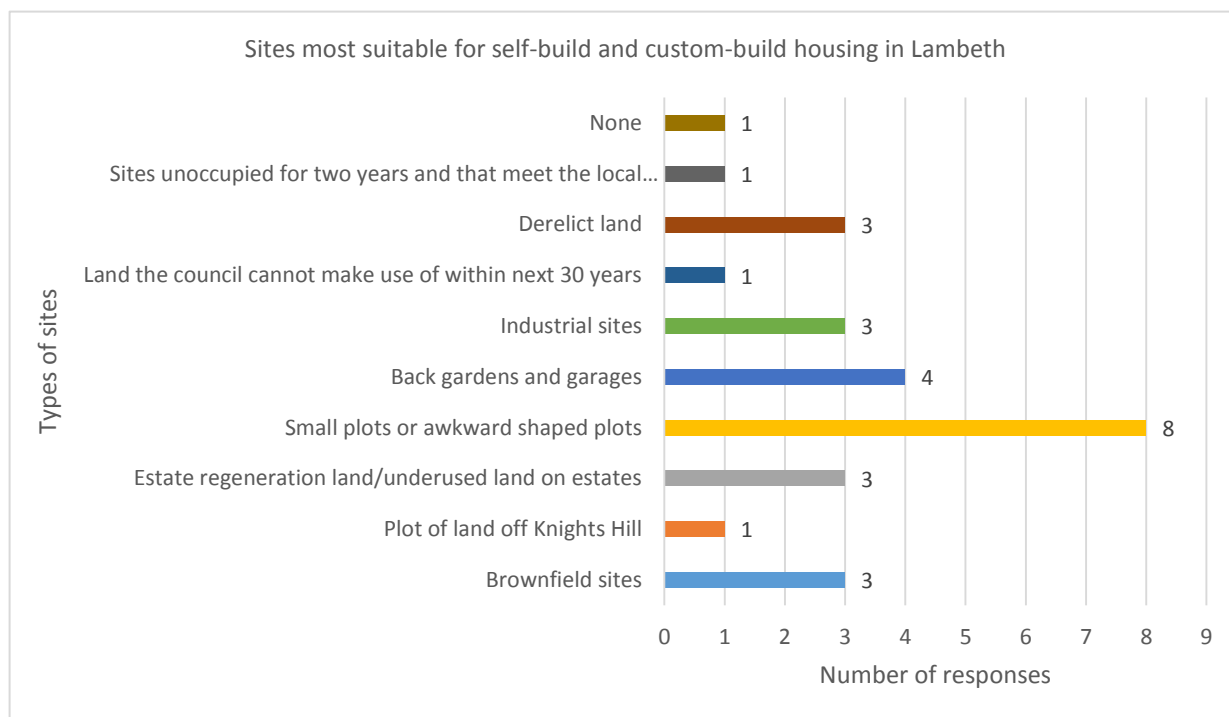
2. There are no large areas of unused, underused or cleared land in Lambeth that would provide an immediate opportunity to create serviced plots. Given high land values in the borough it is also likely to be difficult for a prospective self-builder to compete with other developers to acquire land. What types of site do you think would be most suitable for self-build and custom-build housing in Lambeth?

Survey responses

25 respondents suggested sites they considered most suitable for self-build and custom-build housing in Lambeth. Two respondents argued that self-build and custom-build housing should not be prioritised, whilst another suggested that land is allocated to self-builders rather than them needing to compete with developers.

Respondents who suggested small and/or awkward shaped plots of land reasoned that self-build sites are likely more challenging for normal development but can be enlightening to the empowered self-builder. It was suggested that self-build on these sites allows creative solutions to plots that cannot be used efficiently by the council or developers, self-build might also be the only viable route for use of such small parcels of land and developing these small sites adds value to the local area and prevents an eyesore. Use of brownfield site helps protect green spaces.

Change of use from garages to self-build housing was considered a more effective use of land that also supported policy seeking to discourage car use. Small plots of land and/or underused land within estates is considered to already be connected to local services and was considered appropriate for self-build housing.



Written responses

The Brixton Society consider that self-build housing is likely to be limited to small infill sites for one or two dwellings. They commented that there might be difficulties with overlooking distances and angles and recommended that Local Plan policies H2 and Q14 are revised accordingly.

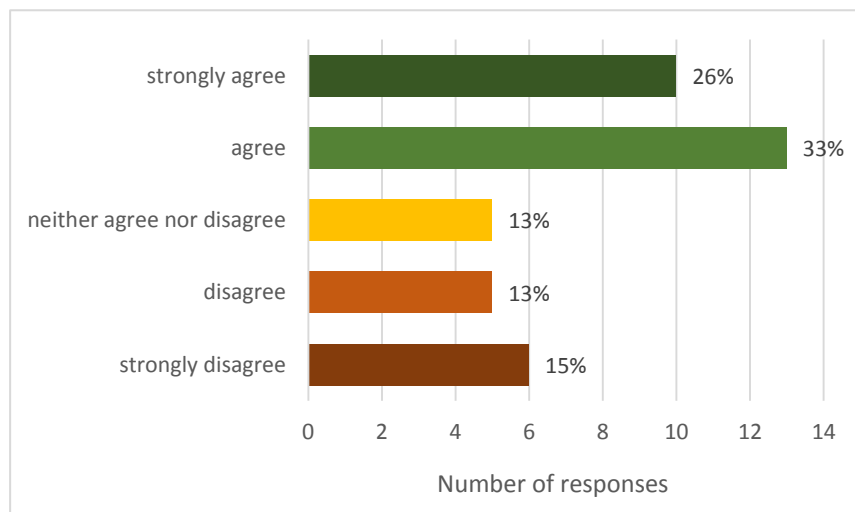
Statutory consultees

Wandsworth Council commented that high land values in the borough will likely mean it will be difficult for self-builders to compete with other developers to acquire land. Accordingly they consider that self-build and custom build housing is probably more appropriate in rural locations with lower land values.

3. Self-build and custom-build housing are likely to involve low density development, which would represent an underuse of land in many parts of Lambeth, in conflict with other planning policies that seek to maximise housing supply. The development of sites for self and custom build housing should only be allowed where this would make efficient use of land. To what extent do you agree with this approach?

Survey responses

39 respondents answered this question, with over half of the respondents strongly agreeing or agreeing that the development of sites for custom and self-build housing should only be allowed where this would make efficient use of land. Almost a third of respondents disagreed or strongly disagreed and the remaining 13% neither agreed nor disagreed.



Respondents who either agreed or strongly agreed argued that because land is a finite resource, it needs to be used well and there is a risk that these plots may become low-density, high-value 'vanity projects' which do not add to the much-needed housing stock. Others suggested that there was no reason self-build cannot be multi-storey and there are great examples of very well utilised land through self-build or community build.

Respondents who disagreed or strongly disagreed argued that there are already too many high density developments, flexibility and variety is needed, and that the council should consider quality as well as quantity. It was also suggested that some awkward, small sized plots of land are not suitable for high density mixed use developments and should be offered to individuals who want to custom build high quality energy efficient homes. One respondent commented that there is a need to save some land and greenery, and another responded argued that low density development should be the only, if any, development allowed.

Of those that neither agreed nor disagreed, one respondent questioned why there are many low density areas in Lambeth that seem to be off limits and another stated it was not possible to generalise

Written responses

The Brixton Society commented that use of backland sites by definition almost always means land is used more efficiently. They also commented that minor changes in dwelling mix or size on small sites will result in wide fluctuation in site densities and that density is not a useful criterion.

Statutory consultees

Wandsworth Council agreed that the development of sites for self and custom building housing should only be allowed where this would make efficient use of land. They stated that given housing delivery is such a priority, especially in the draft London Plan, it seems contradictory to provide low build density for self-build.

4. Do you have any other comments?

Survey responses

Six respondents provided other comments related to self-build and custom-build. These can be summarised into the following issues:

- There should be a detailed analysis of all areas of Lambeth to determine low density areas close to good transport and/or where there is poor quality housing (e.g. low EPC ratings for Victorian homes) which should be targeted instead of good and genuinely affordable estates.
- Stop building tower blocks, particularly ones that remain empty because of 'buy to leave'. Landlords should have to rent to local people if left empty.
- The council should take a less money orientated and a more people/quality of life approach around their decision-making.
- Backland development should be allowed where height of new builds are limited to below 3.5m and set back from boundaries, use low-carbon, maximum green technology/design and high quality design.
- Self-builds should be sustainable in terms of construction materials and energy.
- Self-build projects should be considered under the umbrella of Community Land Trusts and should be communally owned and managed.

Written responses

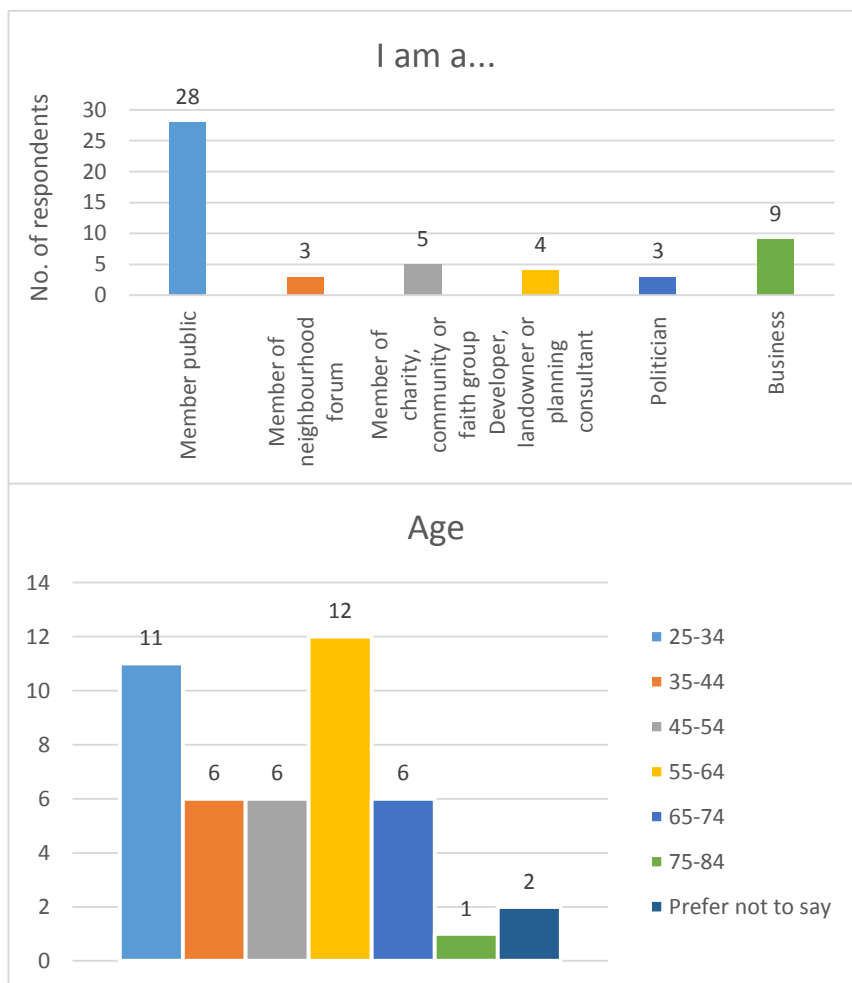
The Home Builders Federation stated it is important to support custom and self-build housing and the council should identify specific sites through its SHLAA and brownfield register that can be earmarked for custom and self-build.

3.8. Business and jobs

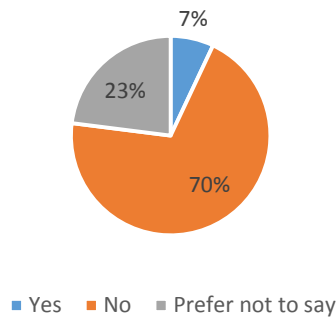
In response to the 'Business and Jobs' survey, 44 responses were received. A total of 20 written responses, including statutory consultees, was received.

Survey responses

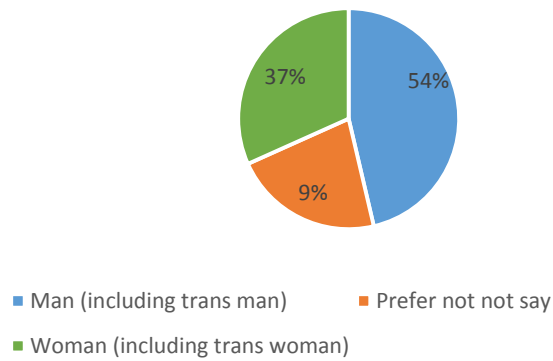
- The majority of respondents for the Business and Jobs survey identified as being members of the public. Nine respondents identified as being a business, five members of a charity, community or faith group, four identified as developer, landowner or planning consultant, three identified as members of a neighbourhood forum and three identified as being a politician. It should be noted that some respondents identified as belonging to more than one category.
- The majority of respondents identified as being 55-64 however over a quarter identified as being 25-34. Only 2% were over 75.
- 34 survey respondents provided an answer to whether they or anyone they lived with had a disability, with the majority of respondents (70%) answering no to the question.
- 54% of respondents identified as being a man and 37% of respondents identified as being a woman. The remaining 9% preferred not to say.
- The vast majority were White British (31), three were Other White and three preferred not to say. One respondent identified as each being Asian or Asian British: Indian; Black or British; Caribbean; Latin American.



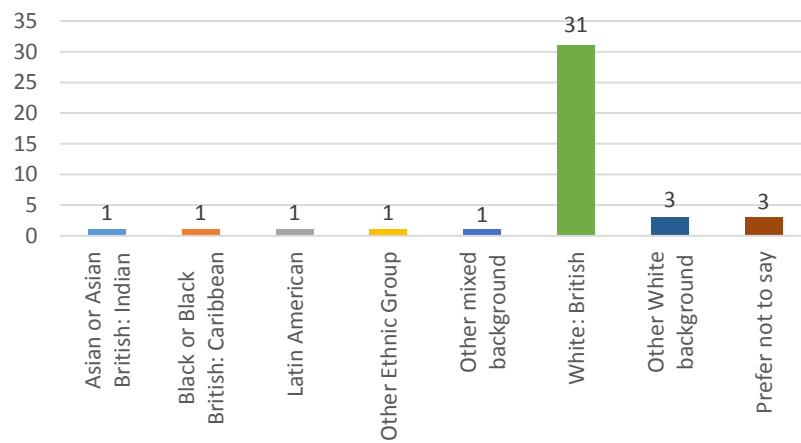
Do you, or does anyone living with you,
have a disability?



Gender



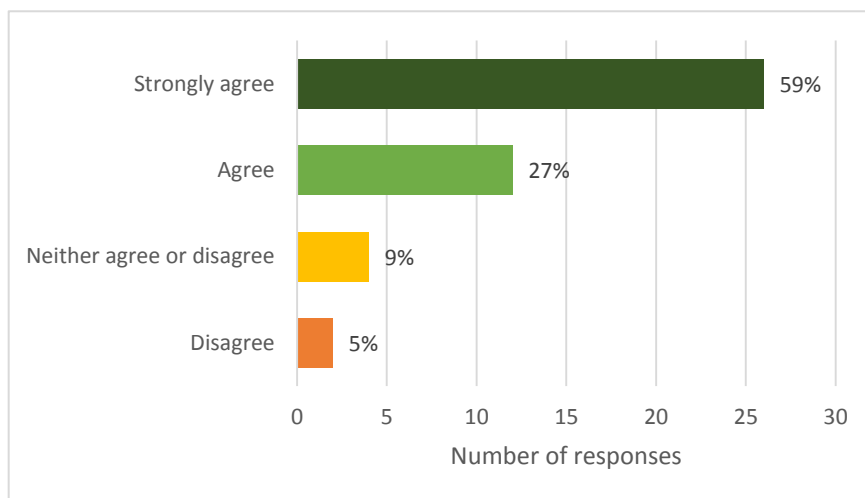
Ethnicity



1. The type and affordability of space required by businesses is as diverse as the businesses themselves. We should secure supportive and affordable workspace from developers at less than market rents to encourage new businesses to grow and develop, particularly in the creative and digital industries. To what extent do you agree or disagree with this statement?

Survey responses

44 respondents answered this question with the majority (59%) strongly agreeing that the council should secure affordable workspaces from developers. A further 27% agreed with this proposal. 9% neither agreed nor disagreed and only 5% disagreed.



The respondents who strongly agreed or agreed with securing supportive and affordable workspace provided the following reasons:

- Affordable workspace is needed for emerging creative industries which is a fast growing sector and without affordable spaces, start-up businesses will have nowhere to go.
- There are not enough small scale businesses in the borough and small businesses provide more jobs and are innovative.
- Permitted development rights have hollowed out employment space which has had major impacts on creative industries.
- Affordable workspaces encourage growth, enhance neighbourhoods and allow mixed communities to thrive.
- People need space to work in Lambeth to prevent it becoming a dormitory for central London.
- Large multi-nationals and developers should support the local area that they are expanding their business interests into.
- Home-grown initiatives who are aiming to develop workspace should be supported, especially when it is targeted at particular groups, such as BME groups. There is a need to take action regarding equality as diversity in this sector has retracted in recent years.

One respondent suggested that 'affordable' is the key aspect of the proposal and should be viewed in local context whilst new businesses from outside the borough which have significant backing should not be able to access this kind of support.

A local politician provided more general comments about affordable workspace:

- There are now increased survival rates for businesses in formative years and that people are increasingly working from home or forming micro-businesses.
- Congregating micro-businesses into a specific area means the likelihood of a 'hub' developing increases, for example the Health Foundry in Waterloo, which will hopefully lead to further more advanced health tech incubator workspace plans.

- Brixton is becoming a bonafide 'food startup' hub but Lambeth is missing out on high value tech-led startup companies (STEM based) and plans to work with Makervisity are welcomed.
- WeWork have opened their shared workspace just across the border in Southwark and Lambeth has missed out.
- Attention must be paid, not just to cheaper workspace, but to ensuring the right management of those workspaces forms part of this policy so that companies can have the support they require to thrive.
- Lambeth is lacking in good quality office space catering for emerging companies (10-50 people) in central locations such as Waterloo, Vauxhall and Clapham.

Another respondent argued that workspace is needed in Waterloo as these spaces are being lost to hotel developments that do not make an equivalent contribution to the local economy because tourists do not use the shops and services there whilst employees do. The respondent stated that the employee support for these facilities keeps them alive and available for the resident population, helping to maintain the vitality of the area.

Berkeley Homes disagreed that Lambeth should secure supportive and affordable workspace from developers at less than market rents for the following reasons:

- It is important to encourage and secure a prosperous economy and this is one of the cornerstones of national planning policy but workspace on long term subsidised/affordable rents does not actually create sustainable economic growth.
- For businesses to be viable and successful they need to be able to cover their costs and return a profit and by providing businesses with below market and subsidised rents, there is potential for non-viable businesses to be created and supported long term.
- There is a role for affordable workspace for business start-ups as a way to encourage local economic growth but affordable rent support for a business must be for a pre-determined period of time only and not an ongoing rental discount.
- When the reduced rental period has expired the business should move to new premises and pay a market rent to free up the affordable space for a new business start-up. Businesses could also remain in situ and be subject to an increase to market rent which would better recognise the overall objectives of what a development is trying to achieve.
- For regeneration schemes in particular, where there is an overall objective of delivering a high-quality development that can bring benefits from high-quality residential homes, the delivery of discrete benefits like affordable employment space may need to be foregone in the wider interests of the development, such as public open space.
- Expecting developers to provide and subsidise employment floorspace would impact on the overall viability of employment and mixed use developments. Any policy will need to set out that the provision of affordable employment space will be taken into account when considering the requirement for developer contributions.

HGH Planning neither agreed nor disagreed and stated it would depend upon the location of the proposed employment space and its quality. They also outlined that the requirements for affordable workspace should also not threaten the viability of schemes.

One respondent queried where the subsidy would come from, whilst another claimed this approach needs to be addressed delicately, ensuring that businesses applying to the scheme are means-tested and will have a demonstrable beneficial impact on the local supply chain. The respondent noted that creative and digital industries can have a positive impact on the areas around them but there is also a risk of too many cloud-based international businesses which have few links to the area. Too many of these types of businesses risk turning the area from a genuinely affordable area for artists into an affluent tech hub, similar to the 'Silicon Roundabout' at Old Street.

Written responses

The Brixton Society stated that there is a growing need for affordable business space but the available supply has been greatly reduced over many years by residential development. A number of developers argued that affordable workspace is not always appropriate and should be considered on a site by site basis.

S P Planning, on behalf of Lexadon Properties Limited, supported the introduction of a policy that supports affordable workspace but made the following points:

- Given new employment floorspace is likely to be aimed at established businesses, introducing a policy that supports affordable workspace would be a reasonable policy objective.
- However, in mixed-use schemes there would be an effect on the level of affordable housing that can be delivered.
- In areas where there is clear need and demand for affordable workspace, securing this could take priority and the new Local Plan should acknowledge that in some situations only affordable workspace would be secured.
- Delivering affordable workspace would also reduce the need to retain poor quality and poorly located employment space on the grounds of its relative affordability, supporting the relaxation of Policy ED2(b).

On behalf of St Clair Developments, Indigo Planning objected to the intention to broadly secure affordable workspace and stated that it requires further consideration. They made the following comments:

- There is insufficient evidence to demonstrate that there is unmet need for below-market workspace or how it would support business growth.
- Evidence must clearly indicate that there is a shortage of affordable business space and that its scarcity presents impediments to commercial growth before imposing a requirement that floorspace should be provided at discounted rates.
- Additional investigation must be carried out to determine whether or where economic conditions exist to make such space financially viable.
- Some neighbourhoods and town centres are challenged by poor retail and commercial desirability. Requiring affordable workspace could further hamper the provision of business floorspace and delivery of housing.

DP9 Ltd, on behalf of ITV, supported of the principle of affordable workspace but argued that some employment sites may not be appropriate for small businesses and are more suitable for buildings with larger floor plates for larger businesses. They questioned that if the proposal is included within the new Local Plan, whether there will be a threshold for providing the workspace. They also stated that it is not appropriate to require affordable workspace on all employment schemes.

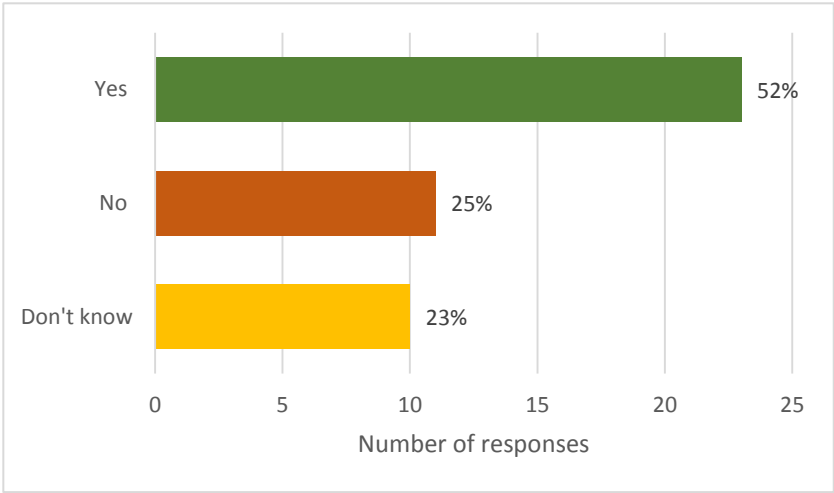
On behalf of CLS Holdings Ltd, DP9 supported a variety of business spaces in the Lambeth and considered that the various forms of business floorspace including flexible small business units and co-working space with shared facilities should be recognised in contributing to the supply of small and affordable business floorspace. However, they argued that affordable workspace provided at less than market rent is not always appropriate as part of all developments and should be assessed on an individual site basis. A blanket requirement for all sites to provide affordable workspace is not considered appropriate.

CBRE, on behalf of Royal London Mutual Insurance Society Limited, argued that affordable workspace should be provided on site where there is demand for such floor space and should be provided on a site by site basis based on the site's location and constraints, rather than a blanket approach to provision.

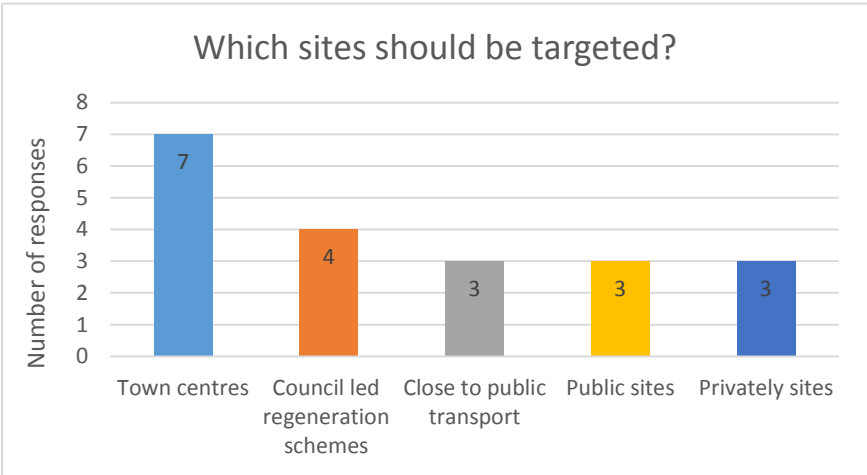
2. We could either take a borough-wide approach to affordable workspace or we could target specific types of site. Examples could include town centre sites, publicly owned sites, council-led regeneration schemes or privately owned sites that were previously in employment use but are coming forward for mixed use development. Should we target specific types of site for the provision of affordable workspace? If yes, please specify the types of site where you think affordable workspace should be provided.

Survey responses

Of the 44 respondents who answered this question, just over half felt that the council should target specific sites for the provision of affordable workspace. 25% of the respondents did not believe that the council should target specific sites and a further 23% did not know.



Respondents who felt that Lambeth should target specific sites outlined which sites should be targeted:



Town centres

A respondent who encouraged targeting town centres felt that it would help to stimulate much needed day time economy for shops and food retailers. Berkeley Homes advocated focusing on town centres and publicly owned sites as they are the most sustainable locations where co-location of uses will contribute to a sustainable and prosperous town centre. Focussing affordable workspace in town centres will ensure the space is highly accessible and will encourage public transport usage over private car trips, make a positive contribution to footfall and spending within town centres and take up surplus retail floorspace.

One response felt that Lambeth should target sites in Waterloo generally, unless they are designated for retail or social housing, as many sites suitable for workspace in Waterloo have been lost to hotels or to luxury housing. Another respondent felt that town centres like Brixton and Loughborough Junction should be targeted to keep these as diverse places rather than just having bars.

Publically owned sites

A respondent who encouraged using publically owned land states that this could veto certain types of business, ensuring a variety that supports residents. Other respondents suggested targeted ex-industrial land, underused publicly owned land such as land near railway lines or using council buildings.

Close to public transport

One respondent argued that these sites must be located in high PTAL rating areas to generate significant revenue and usage, otherwise there is a danger of setting a quota for developers only for those workspaces to revert to an alternative use class because the likelihood for meaningful usage is low. The respondent recommended any such policy to focus on areas such as Waterloo, Clapham, Brixton, Vauxhall and the Streatham station to Streatham Hill station corridor. Other respondents recommended sites close to public transport due to commuting cost benefits, making private car use unnecessary and helping areas regenerate faster.

Other sites

KG Creative Consultancy suggested sites where the employment workspace will deliver jobs as part of mixed use schemes and a proportion can be provided as affordable workspace should be targeted. One respondent encouraged using sites within business areas as this would be sustainable. Another suggested that the council should provide start-up hubs for younger workers who can't afford costly rents.

One respondent noted that targeting specific sites would allow the council to make a bigger impact but should be combined with a borough-wide approach. Another suggested that this approach represents a great opportunity for targeted regeneration.

Two of the respondents who disagreed with targeting specific sites commented that not all sites will be suitable and should be looked at on a site by site basis. Another respondent suggested that the council should make informed choices about what and where to develop based on needs and costs. Two respondents preferred a borough-wide approach because areas south of the borough tend to be neglected, suggesting Pollens Yard as a good example to replicate. Another respondent felt that affordable workspace needs to be included in all mixed use development whilst another felt that town centres are already quite congested.

Respondents who said they didn't know felt the council should not limit itself to specific sites but instead use all available suitable sites and flexibility is an advantage. Evans Pearson LLP stated that any site for start-up business uses is welcome.

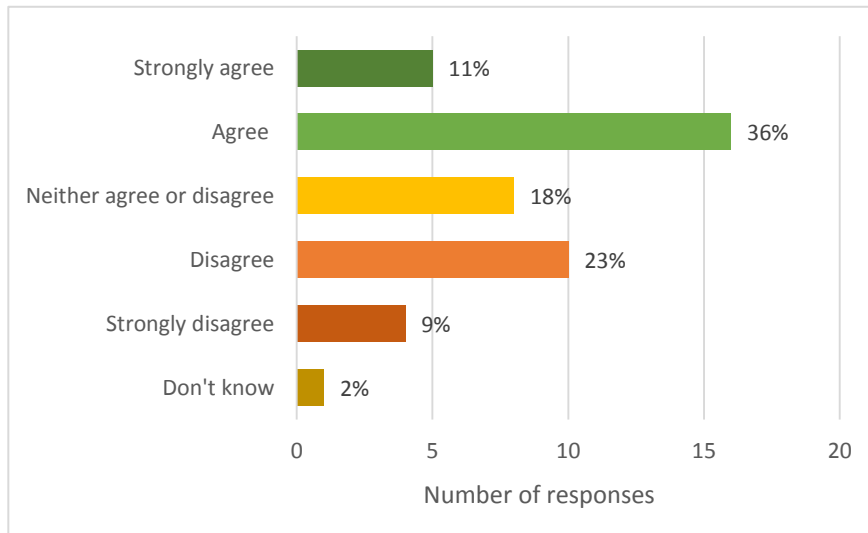
Written responses

The Brixton Society stated that preferred sites would be Town Centres, KIBAs, and existing employment floorspace where actual employment density is low.

3. We should require developers of new business space to work with specialist affordable workspace providers chosen by the council. To what extent do you agree or disagree with this statement?

Survey responses

47% of the 44 respondents who answered the question either agreed or strongly agreed. However almost a quarter disagreed that developers of new business space should work with specialist affordable workspace providers chosen by the council. A further 9% strongly disagreed. 18% of respondents neither agreed nor disagreed and just 2% did not know.



Respondents who either agreed or strongly agreed highlighted that the council should have an input with any development in the borough and that the council would be better able to monitor and deliver a better outcome if control remains with the decision makers. Other respondents commented that this would help to target the right businesses, ensure that there are appropriate checks and balances and help micro-businesses access expertise, investment opportunities and assistance. Respondents also argued that developers don't consider that they have any responsibility towards community spaces, including affordable workspace, for voluntary sector organisations or community-run initiatives.

Berkeley Homes stated that whilst they disagree there is an imperative for affordable workspace, where it is provided subject to viability, the set up and management of affordable workspace should be taken on by specialist providers and the most effective vehicle for this is not-for-profit or charitable trusts.

One respondent suggested that the council needs more diversity and should work with companies such as Shared Assets who consider all aspects of land uses, working with all stakeholders, rather than disrupter change agents.

Respondents who either disagreed or strongly disagreed were suspicious of the suppliers, how they were selected, how the process would encourage entrepreneurs and questioned why the council would choose to restrict choice in a competitive market. Others stated that that the council does not always know best and should not get involved with choosing the providers as its relationship with organisations such as BIDs is questionable. It was also felt that the council should vet any proposals and agree them on a case by case basis, taking into account location, size and s106 commitments.

HGH Planning claimed that not all schemes with new business space should be required to provide affordable workspaces and argued that applicants may wish to operate the workspaces either themselves or in partnership with their preferred providers.

Evans Pearson LLP, who neither agreed nor disagreed, would like to see all business space providers encouraged without imposing adverse conditions. They stated that the real problem is the loss of commercial space to residential developments and felt that these developers should replace the commercial space that is lost. Brixton BID outlined that the council should open up the market to new, even non-council led specialists in workspace.

Written responses

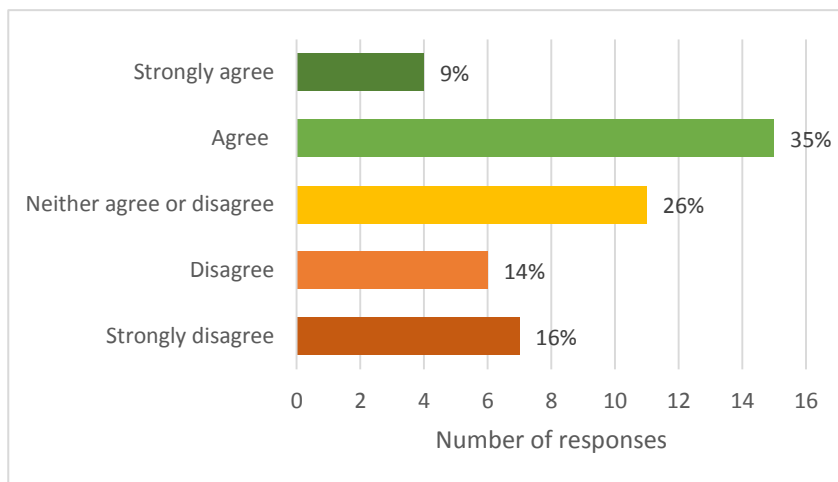
On behalf of ITV, DP9 stated that the council should not preclude developers or applicants working with their own chosen partners to deliver specialist workspace as it may limit flexibility and deter bringing forward large scale mixed use schemes. Any policy should be carefully worded so that applicants work with specialist affordable workspace providers chosen by the council or with their own chosen by the council. DP9, on behalf of CLS Holdings Ltd, also argued that the using workspace providers chosen by the council is restrictive but encouraged the council to offer a list of recommended providers.

The Brixton Society argued that there are several firms active in workspace management and competition in this field is driving innovations. They objected to any monopoly situation in which developers are obliged to work with one agency selected by the council.

4. The Lambeth Local Plan needs to strike the right balance between housing and jobs. Securing affordable workspace within new development can sometimes impact on the amount of affordable housing that can be secured. If a choice has to be made in new developments, securing more affordable housing should be a greater priority than affordable workspace for small business. To what extent do you agree or disagree with this statement?

Survey responses

43 respondents answered the question and the majority of them agreed or strongly agreed that affordable housing should be given greater priority (44%). Just over a quarter neither agreed nor disagreed, however 14% disagreed and 16% strongly disagreed.



Respondents who either agreed or strongly agreed that securing affordable housing should be a greater priority than affordable workspace for small businesses for the following reasons:

- There is a housing shortage not a job shortage and there is not enough affordable homes.
- Housing is currently the priority but that may change if more is provided.
- There should be a priority for housing who cannot afford to buy or rent privately.
- Developers need to stop making large profits by manipulating the market, for example limiting amount of development that comes onto market.

HGH Planning advocated assessing developments on a case-by-case basis, whilst two respondents suggested that it depends on the location of developments, considering the proximity to selected town centres and PTAL ratings.

Berkeley Homes claimed that seeking both affordable housing and affordable workspace adds additional cost and complexity to viability considerations of a proposed development. There must be recognition of the impact that affordable workspace will have upon viability and there needs to be flexibility in the plan to allow for a site by site assessment rather than a blanket approach.

Those who disagreed or strongly disagreed highlighted that Lambeth should be aiming for balanced communities whereas another noted that Lambeth needs more jobs, not more people. The Brixton BID argued that these are entirely different options and one should not be held at ransom for the other and advocated developing two different policies. Another respondent expressed that they should be equal priority as the cultural infrastructure of London is under threat and creativity needs to thrive as well as housing.

One respondent felt that housing developers could solve the issue of housing if the right mechanisms are in place, whereas affordable workplace rents cannot be resolved by the market as developers will always protect the 'profit' generated by the market and won't provide affordable workplaces. Another respondent felt that affordable housing is a myth and another argued that Build to Rent should offer more affordable housing. Herne Hill Traders Association felt that whilst Right to Buy legislation remains un-amended there is no incentive to build.

One respondent, who neither agreed nor disagreed, argued that there needs to be a planned mix of affordable housing and employment whilst Evans Pearson LLP stated that there needs to be balance. Four responses felt that Lambeth could use both options with one response noting that Lambeth should make developers provide both affordable workspace and housing.

One respondent stated that both are required in Waterloo and argued that hotels and luxury apartments have displaced workspace and affordable housing. Another respondent suggested that it should be determined by local conditions and market.

Written responses

DP9, on behalf of ITV, argued that the provision of affordable workspace needs to be judged on a case by case basis and should reflect the circumstances surrounding each site. They argued that in some cases employment provision may outweigh the delivery of affordable housing and as such, providing affordable workspace may be more beneficial.

DP9, on behalf of CLS Holdings Ltd, highlighted the need to strike the right balance between housing and jobs, and agreed that providing affordable housing alongside affordable workspace can be unviable. They claimed that affordable workspace should be subject to viability considerations and be considered in the round. Where new affordable workspace is not appropriate or cannot be viably provided, they claimed that a financial contribution could be an option. DP9 also argued that a clear definition of affordable workspace is required, including the amount below market level that would be defined as affordable and the period of time that this would be maintained for. A clear calculation for affordable workspace contributions is also required.

GL Hearn, on behalf of R&F Properties, argued that affordable workspace should be considered as equally important as affordable housing in creating sustainable communities. They encouraged using affordable workspace policy, modelled on affordable housing policy, as an economic development tool to stimulate regeneration through attracting creative industries.

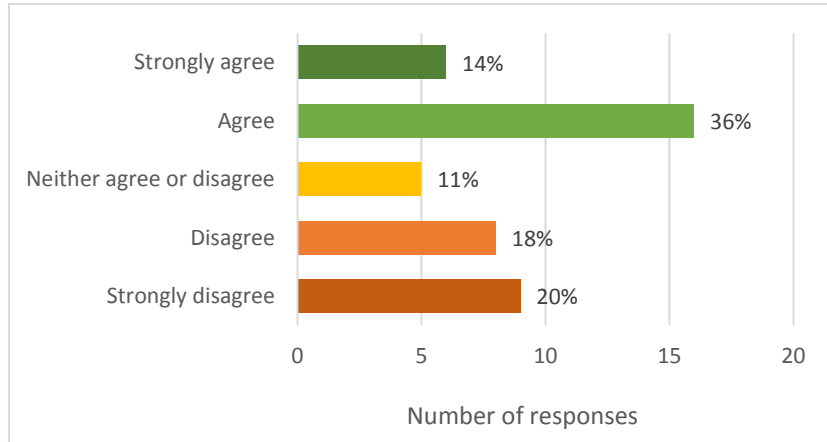
Statutory consultees

The Mayor requires Transport for London Commercial Development to deliver at least 50% affordable housing within its planning applications, across its portfolio. Within a mixed-use scheme, TfL will only consider the provision of affordable workspace if it is able to deliver the required quantum of affordable housing.

5. If developers say they cannot provide new small business space to replace what is lost when they redevelop a site we should allow a financial contribution instead to help provide new small business space elsewhere in the borough. To what extent do you agree or disagree with this statement?

Survey responses

44 respondents answered this question and half of respondents strongly agreed or agreed. 38% of respondents disagreed or strongly disagreed. 11% of respondents said they neither agreed nor disagreed.



Respondents who either agreed or strongly agreed with requiring developers to provide a financial contribution to help provide new business space believed that the site should be ring-fenced and agreed as part of the application so both are developed at the same time. It was suggested that the council should charge extra if it is offset to another site or index link to the uplift value of the site, especially if the space was in full utilisation before or the development has pushed out small businesses.

Three developers (HGH Planning, KG Creative Consultancy and Berkeley Homes) argued that the amount of financial contributions should be subject to viability. Evans Pearson LLP argued that it would need to be carefully monitored and suggested that the council seek independent advice as to whether the developers are correct in what they assert.

One respondent argued that it would be pointless to have small workspaces provision dotted arbitrarily in the borough which do not then generate critical mass or have any corresponding support structures.

Respondents who either disagreed or strongly disagreed felt financial contributions should not be allowed as a way for developers to get out of their obligations as it will allow them to move the problem on, result in a loss of business space and argued that developers will abuse the process. One respondent argued it would allow developers to buy themselves out of Local Plan requirements whilst another argued that developers should be forced to re-submit their plans and meet their obligations. Other respondents argued that:

- Developers shouldn't be allowed to redevelop existing business sites for housing and it is very unlikely that a financial contribution will be used to provide for new businesses unless the money is ring-fenced and spent within the required time.
- No financial contribution is comparable to the benefits of local business activity which are not only measurable in money.
- Developers should be required to make a physical contribution.
- There is a need to change the status of mechanisms around land value, to protect what needs to be protected.

Respondents who neither agreed nor disagreed commented that the proposal may encourage developers to not replace small business space. They also suggested that it depends on the viability of providing business space, financial contributions may be difficult to enforce and mixed-use developments should be encouraged.

6. We have reviewed our Key Industrial and Business Areas (KIBAs) and found most provide well for specific business needs. However, some have experienced permitted changes to housing and some sites may have potential for development involving a mix of small business space and housing. We also think there is potential for a small number of new KIBAs. Take a look at the proposed changes to KIBAs before answering the question below. What is your view of these proposed changes?

Survey responses

26 respondents provided a response to the proposed KIBA boundary changes. Six respondents supported the proposals, with one respondent welcoming any new employment land being made available.

KG Creative Consultancy questioned whether the changes go far enough in some locations. The Brixton Society wished to retain the existing pattern of KIBAs in the Brixton area and argued current Article 4 directions should remain in place to prevent the piecemeal loss of employment space to residential use.

Two respondents stated that there should be no net loss to KIBA employment space. One respondent welcome the proposed new KIBAs but argued that they would not offset the proposed loss of jobs in those areas. Another response outlined that some of the proposed changes would leave areas without any major job providers for local people and that areas to be lost will be developed for housing which is not what is needed in those locations.

Herne Hill Traders Association stated that replacement of commercial by residential seems to be continuing unabated. One respondent labelled the proposals 'a disaster' and stated that more KIBAs are needed in the north of the borough. Similarly a response recommended adding KIBAs in Waterloo to protect against further loss of workplaces to luxury apartments or hotels.

Three responses stated that there should be more flexibility to accommodate mixed use developments in KIBAs to meet the development needs of the borough. HGH Planning outlined that all KIBAs should be considered for mixed- use development where the existing employment floorspace is re-provided within the scheme and stated that this approach is being taken by other authorities such as Southwark to assist in meeting growing housing needs whilst protecting existing employment provision. Another respondent felt that KIBAs need to be carefully considered on a case by case basis and presumed that any change to permit residential development within a KIBA will set a precedent for further applications.

One respondent felt KIBAs should be improved to allow pedestrian permeability as they make adjacent areas difficult to navigate in a number of locations.

Some respondents were not sure about the proposals or had no view to give. Another respondent felt it was difficult to comment without more detail and felt that scrutiny should be on any s106 and community consultation, which should be undertaken by people who understand the area.

Table 2: Survey responses and written responses regarding existing KIBAs

Key Industrial Business Area	Issues Proposal	Respondent	Summary of comments
2. Waterloo Works	Full de-designation	SP Planning on behalf of Lexadon Properties Limited	Fully support the de-designation. About 19% of the floor space in this KIBA is in B-class use and there is limited scope for further employment-only development. The area is not, and is unlikely to become, an industrial and business area.
4. Hackford Walk	Partial de-designation	Dalton Warner Davis LLP on behalf of Euro Labels Printers Ltd	Support the removal of parcel 3 from the KIBA as this parcel is no longer in commercial/industrial use and has been permanently converted to residential. The KIBA designation of parcel 4 should also be removed as it is will become a small KIBA island site that will be surrounded by residential. There are residential and conservation areas around the site which restrict KIBA uses and the level of interest received from potential occupiers. Occupiers prefer to

			locate where there is a clustering of commercial activity. Planning permission was granted in 1997 for parcel 1 to be converted from commercial use to use as a museum (a personal permission that has been in place for 20 years). Only parcels 2 and 4 are currently being used for commercial purposes (i.e. 0.16ha). Access to the site is restricted down a narrow road - this further limits the type of uses. The KIBA designation should be removed from parcel 4 and the council should consider the complete de-designation of the KIBA.
5. Montford Place – Beefeater/Oval Gasworks	Partial de-designation	Boyer Planning on behalf of Berkeley Homes	The changes do not go far enough to facilitate the comprehensive and co-ordinated mixed use redevelopment of this KIBA. In terms of both purpose and economic output, the KIBA sites proposed to be kept make only a modest contribution in terms of jobs. It is considered that in light of the commitment to bring forward the Masterplan, the KIBA designation is no longer required and full de-designation is justified.
5. Montford Place – Beefeater/Oval Gasworks	Partial de-designation	Member of the public	Uneasy at the proposals which seem to be taking advice from a single developer on what might be achieved. Questioned whether there had been any public consultation.
5. Montford Place – Beefeater/Oval Gasworks	Partial de-designation	Transport for London Commercial Development	It is proposed to partially de-designate the Montford Place –Beefeater / Oval Gasworks KIBA. This does not accord with previous discussions with the Council or with the comprehensive masterplan that the Berkeley Group has been preparing in partnership with the Council. The partial de- designation would not facilitate the comprehensive and co-ordinated, mixed-use redevelopment sought. The masterplan (which includes a temporary works site owned by TfL) would deliver more employment floorspace and jobs than are currently provided within the KIBA, together with new housing development (including affordable homes), environmental improvements, better permeability and high quality public realm. To deliver the masterplan, additional sites would need to be de-designated, including the TfL temporary worksite which is currently used to facilitate the Northern Line Extension. This is not an employment site and the Draft London Plan confirms that the principle of 'no net loss' of employment floorspace capacity would not apply to it. We are aware that the Berkeley Group is also seeking de- designation of additional sites (including TfL's current worksite) that are needed to deliver the masterplan. In terms of both the purpose and economic output of the KIBA, all of these sites make only a modest contribution in terms of jobs and this should be contrasted with the masterplan which proposes comprehensive and more intensive employment-based redevelopment as part of the mixed use scheme delivering other planning benefits.

8. Clapham North Industrial Estate	Minor boundary change	CBRE on behalf of Royal London Mutual Insurance Society Limited	RLMIS owns a significant holding in the KIBA, Policy H1 of the emerging London Plan sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans, especially considering housing intensification on appropriate low-density sites in commercial uses or through industrial sites that have been identified in the employment policies. It is considered that the RLMIS site is such a location. Lambeth is noted as an area that should retain its industrial capacity, however Policy E7 of the emerging London Plan requires development plans to be proactive in encouraging the intensification of business uses in B1c, B2 and B8. RLMIS supports the transfer of some industrial land to residential uses particularly in areas surrounded by residential uses. It is noted that the evidence base being taken forward as part of the view highlights that this KIBA is to be extended by 0.02ha to include Unit 6 and the assumption that the site will be developed and no additional capacity should come forward. Contrary to national and regional policy. This is a lost opportunity to be allocated for transition between the KIBA and the residential estates to the west. It is preferable to include flexibility to the land use approach at this peripheral point whereby the opportunity to optimise through additional commercial floor space can be realised. RLMIS has full ownership and control of the site.
11. Coldharbour Lane Estate and Bengeworth Road Depot	No change	RPS CGMS on behalf of King's College Hospital	King's would particularly like to provide their input and expertise in terms of safeguarding healthcare provision in the borough and further safeguarding the future development potential of the Denmark Hill Estate. In response it is recommended that the Council seek and bring forward partial de-designation of this KIBA to remove the full extent of land parcel 2 to enable a wider mix of uses on this part of the King's estate. Parcel 2 – this part of the Denmark Hill estate is underutilised and includes predominantly ancillary offices and medical services of KCH. It could bear a more sustainable use of land whilst providing short term benefits in terms of temporary use. Its designation as KIBA is a significant constraint to potential development for other uses. Given the links of this parcel of land to the wider King's estate, the likelihood of KIBA- compliant uses coming forward on the site is limited given the wider benefits that would be met by delivering further medical uses and enhanced function in this area. De-designation would not significantly harm the overall supply of KIBA land in the KIBA and wider borough. King's seeks a partial de-designation of the KIBA to remove the full extent of land parcel 2 to enable a wider mix of uses, including employment and medical uses, on this part of the King's estate. This will serve to assist in any wider decanting of medical services, enabling works and key functions such as car parking for staff and consultants. Evidently non-KIBA compliant uses are associated with this land parcel and can be more appropriate. It should be noted that any future development linked to this site can engender

			employment generating uses which, though non-KIBA compliant, would still complement the overall function and role of the designated KIBA. There is clear policy support at a strategic level to the enhancement and development of healthcare facilities. King's agree wholly in a vision that continues to consolidate and enhance healthcare provision in the borough given the critical role King's plays in the social and economic development of the local community. King's trusts the council will interpret the current and emerging London Plan documents positively and that the provision of high quality health care can be further advocated with the addition of high quality, sustainable buildings that enhance the local area and improve the public realm for visitors and locals alike. King's strongly agree with a positive area vision on Denmark Hill and also believe that the intensification of the estate to support the functioning of hospitals in the nearby area can be achieved through the introduction of high quality and modernised buildings appropriately designed to their setting.
14. Camberwell Trading Estate and adjoining sites	No change	Rapleys LLP on behalf of Bizspace	BizSpace is keen to ensure that the updated Lambeth Local Plan provides the flexibility necessary to allow BizSpace to continue to operate and manage the property within its portfolio in a way that can respond to changing circumstances, including the ability to promote sites for alternative non- employment uses where appropriate. The current wording of Policy ED1 is overly prescriptive and does not recognise that some existing and designated KIBA sites may not represent a viable or efficient use of land and an alternative use can bring forward other non-employment uses (other than and not ancillary to B1, B2 and B8), that respond positively to wider opportunities for growth and the need for different land uses. The policy provides no flexibility that can allow for the consideration of alternative uses where it can be demonstrated there is no reasonable prospect that a site can be maintained in employment use. Lilford Business Centre requires significant investment to modernise, the property is unlikely to contribute to continued economic growth in the medium-long term. The site is not a key location (market attractiveness) and is unlikely to attract sufficient investment necessary to secure its long term employment use. It has a negative impact on the streetscene and character and appearance of this primarily residential area. Bizspace exploring potential for a residential led mixed use scheme including business floorspace. Bizspace objects to the continued allocation of Lilford Business centre within the KIBA. Current employment use fails to achieve efficient use of the site, which is located within a residential area. It should also be noted that BizSpace is currently exploring the potential for the redevelopment of the Lilford Business Centre to provide a residential led mixed use scheme, also including business floorspace.

			First pre-application discussions with the Local Planning Authority are likely to take place early in the new year. In the above context, BizSpace objects to the continued allocation of the Lilford Business Centre within the KIBA and seek its removal from this designation in the further draft of the Local Plan partial review. The current employment use fails to achieve the efficient use of this site and as such is unlikely to provide a viable employment use for the plan period. BizSpace's Lilford Business Centre embodies a clear redevelopment opportunity, given its location within a predominantly residential area, with residential properties located adjacent and opposite the site (and the consequent constraints this itself places on the future employment potential of the site).
18. Kennington Business Park	No change	Rolfe Judd on behalf of Workspace Plc	Kennington Business Park is wholly owned by Workspace a unique provider of business and employment space in London. Kennington Business Park provides a variety of different types of employment and business space such as; offices, studios, co-working space, meeting rooms and workshops. Buildings fronting onto Cranmer Road and Foxley Road/Camberwell New Road have surpassed their reasonable lifespan and are in need of considerable investment to bring them up to a standard that complements the rest of the site. The site is not conducive to industrial uses given poor servicing access and layout. Much of the Park is in B1a use. Buildings along Cranmer Road and Foxley Road should be considered for release from the KIBA as part of a wider masterplan which would introduce different uses such as commercial and residential. Buildings along Cranmer Road and Foxley Road are not locally listed. Any comprehensive redevelopment of the site would take into account the historic context of the heritage buildings. Any reiteration of the KIBA review document and any other associated documents should be reflective of this local listing. The KIBA Review document does not take into consideration the potential for the KIBAs to be intensified through increased efficiencies, redevelopment and/or reconfiguration. They argued that the methodology underpinning the review has not been released or independently tested and felt the recommendations appear to be unsubstantiated and aren't based on a verified system so alterations to the Local Plan based on the findings of this document will not meet the tests of soundness. The erosion of KIBAs within the borough is based on hectares and does not take into consideration the potential benefits of introducing a variety of uses such as commercial and or residential. They argued that figures regarding loss of KIBA land between 2010 and 2015 do not take into account the losses to other uses on a site by site basis which may have been lost to

			more sustainable/appropriate uses. Figures will also have been skewed by PD rights to residential and suggested the figures do not represent a true reflection of the release of KIBA and non-protected sites in relation to the overall quantum of floorspace within Lambeth. Workspace stated that KIBA policy should take into account into London Plan policy E4 and E7. There is a need to allow investment to flow and business centres to be rejuvenated in a way that meets the emerging SME market. They claimed that this can be achieved through more flexible application of KIBA policy in recognition of the benefits cross subsidisation of the KIBA would bring through period review of KIBAs alongside the need for business floorspace and the potential increased efficiency at KIBAs would achieve. KIBA policies are outdated and not conducive to providing uplift in business floorspace, jobs and revenue in the borough through the promotion and development of complimentary uses. The outdated buildings along Cramner Road and Foxley Road would be appropriate candidates for release from its KIBA designation as part of a consolidated masterplan for the Business Centre which would introduce a variety of different uses such as commercial and residential in addition to retained business floorspace. This subsequent change in flexibility would allow for a greater scope in the redevelopment and rejuvenation of the whole site. As previously outlined, Workspace would provide modern high quality floorspace specifically designed to cater for SMEs, thereby increasing the employment density and the overall quality of the site in addition to increasing the permeability and complementing the variety of adjacent uses. Although the site does contain a number of buildings which are of historic value, there are a similar number of buildings at the site which do not contribute any architectural or social value. Notwithstanding, it is considered that any comprehensive redevelopment of the site would take into account the historic context of the heritage buildings.
22. Shakespeare Road Business Centre	No change	Rapleys LLP on behalf of Bizspace	Need to acknowledge that in certain circumstances, the KIBA may no longer be suitable or viable for ongoing employment use. The current wording of Policy ED1 as overly prescriptive and does not recognise that some KIBAs may not represent a viable or efficient use of land and an alternative use can bring forward other non-employment uses other than B1/2/8. They argued that the policy provides no flexibility to consider alternative uses where it can be demonstrated there is no prospect that a site can be maintained in employment use. Lambeth is capable of accommodating a sufficient supply of employment floorspace to meet its future requirements. BIZSPACE support small-scale business space and employment space but felt that there should be greater flexibility in recognising that some existing KIBA-designated employment/industrial sites may be capable of being

			offered for alternative uses in order to maximise the efficient use of land.
25. Southbank House and Newport Street	No change	U+I Group PLC	The KIBA includes part of site allocation 10. For consistency with the site allocation and other planning objectives, the part of the site allocation that falls within the KIBA should be considered for de-designation. The KIBA review notes that whilst the preferred use is set out in Site 10, the potential of the central and east sites (2 and 3) to meet the demand for employment uses will depend “on the outcome of this proposal”. This is not a sound basis for retention, which should be plan led and take account of the site’s strong potential to “help meet strategic and local requirements for a mix of other uses such as housing (London Plan policy 4.4). The assumption that the KIBA fulfils the need for identification of important industrial land in the Borough is negated by the preference for office development as the preferred employment use – rather than industrial. The site has potential for inclusion of office development in accordance with London Plan Policies 4.2 and 4.3. CAZ SPG suggests equal balance between offices and other CAZ strategic functions relative to new residential in this locality unlike other parts of the CAZ. This site is not suited to conventional industrial (or waste) development. To allow flexibility for the site to come forward for mixed use development (as proposed) Lambeth should consider de- designation of parcels 2 and 3 from the KIBA to better comply with the employment policies of the London Plan. There is a clear discrepancy between the adopted strategic policy in the London plan and both existing and intended local plan policy which is unsound. KIBA policy and designations make no differentiation between parts of the borough that are within/outside of the CAZ. There is a need to review the appropriateness of using the KIBA designation within Lambeth. Need to review whether retention as a key LSIS within the CAZ and high public transport accessibility meets the government’s desire for LPAs to review whether low density employment allocations are any longer fit for purpose.
25. Southbank House and Newport Street	No change	Nexus Planning on behalf of London Fire and Emergency Planning Authority	There should be a partial de-designation of the Southbank House and Newport Street KIBA to exclude land that is also covered by Local Plan Policy Site 10: The Site is subject to a site allocation policy in the Local Plan. The LFEPA and U+I Group PLC have been consulting on emerging proposals for the site – a mixed used development to provide a replacement fire station, a museum, employment space, retail, hotel, residential (including affordable housing) and public open space. The council is not proposing any changes to the KIBA in the ‘Proposed Boundary Changes and Proposed New KIBAs’ document however this approach is not considered sound in respect of:

		• the effective regeneration of the site and wider area; • the delivery of community infrastructure; • there being no harm to economic objectives; and • the need for housing. The approach of maintaining the current KIBA boundary is also inconsistent with the council's approach elsewhere in partially de-designating the Montford Place/Oval Gasworks KIBA. There is an inconsistency in the Local Plan between the KIBA designation of the Middle Site and Rear Site and Policy Site 10. With regards to allowing residential development within the KIBA to be considered. This policy provision for non-KIBA uses in the KIBA is justified at site-specific and area-wide level by the need to: • optimise the layout and arrangement of buildings and uses across the site; and • contribute to the objectives for the wider regeneration of Vauxhall. At a site-specific level, development under Policy Site 10 is required to deliver a significant range of benefits and requires the amount of replacement employment (the number of jobs) to be maximised. These site-specific issues are complex and interrelated, which is why Policy Site 10 needs to include such flexibility so as to be able to balance the various designations and constraints on the site. The front and middle of the site are within the CAZ (see London Plan policy 2.11 which allows a mix of uses including housing) and the whole the site is within the Vauxhall, Nine Elms & Battersea Opportunity Area, as defined by London Plan Policy 2.13 which allows a mix of uses where appropriate. The Vauxhall Nine Elms Battersea Opportunity Area Planning Framework SPG anticipates that housing-led development with a mix of commercial and community uses will come forward in this area. Local Plan PN2(k) seeks for an expanded range of employment and residential uses in Lambeth Gateway character area and PN2(o) is contrary to the more flexible mixed use development promoted throughout the Vauxhall Policy PN2 area. Policy Site 10 is being proven to be effective at delivering mixed use regeneration development in a designated Opportunity Area. The flexibility of Policy Site 10 to consider a mix of uses across the KIBA parts of the site is vital to its effectiveness to deliver regeneration development and growth. Without this flexibility, the Local Plan Examination Inspector agreed with the LFEPA that Policy Site 10 would be unsound – the Inspector rejected a proposed modification to Policy Site 10, which would have reduced its flexibility to be more consistent with other KIBA policies. Where Policy Site 10 is plainly inconsistent with the KIBA designation (Local Plan Policy ED1) and the only way to resolve this conflict is to de- designate the Middle Site and Rear Site from the KIBA.
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			The existing fire station on the Site (Lambeth Fire Station) is an element of social/community infrastructure. The ability for the LFEPA to re-provide a fit for purpose, operational fire station on the Front Site is an essential part of any redevelopment, as is reflected in the preferred use paragraph of Policy Site 10. The opportunity to release the latent value of the Site, to fund the required fire station social infrastructure in this location, is a key element of the LFEPA's Corporate Property Project and Asset Management Plan. Policy Site 10 is able to ensure that a re-provided fire station (as social/community infrastructure) comes forward, as seen in the current emerging proposals for the Site. This ability to meet this need is an important reason why the flexibility in Policy Site 10 must be retained and any conflict with the KIBA designation must be dealt with by the partial de-designation of the KIBA. With the KIBA de-designation of the Middle Site and Rear Site, the Council's economic and employment objectives would not be harmed as: • many KIBA uses are unsuitable for the Site because they are 'bad neighbour' uses; • B8 uses are constrained by the local road network; • the KIBA does not cater for all of the growing sectors of the local economy and hence is constrained as an employment generation policy; • office supply is not dependent on the KIBA; and • growing employment sectors tend to be more 'neighbourly' uses that can readily be accommodated as part of mixed use developments. The flexible mixed use policy for the Site is justified in that it does not compromise the strategic objective of supporting the growth of key employment sectors. A flexible mixed use policy approach must also be considered in the context of housing need in Lambeth and across London. Many homes are capable of being delivered on the Site, in the context of the flexibility afforded by Local Plan Policy Site 10. To remove this flexibility would be unjustified and inconsistent with national policy. Lambeth recommends the partial de-designation of the Montford Place KIBA to allow opportunity for a mixed use development to include business space and housing. This recommendation is despite this site having no allocation in the Local Plan and being outside of any opportunity area and the CAZ. The Council is clearly willing to remove land from its KIBAs where this will facilitate major regeneration development. When this example is compared to the circumstances surrounding the Middle Site and Rear Site – that this land is essential in bringing forward a wider mixed use regeneration development – it is considered that the same approach should be taken. However, when regard is had to the existing allocations policy allowing the consideration of a flexible mix of uses and the judgement of the Examination Inspector that this flexibility is necessary for the policy to be
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			effective, the case for the de-designation of the Middle and Rear Sites becomes compelling.
27. West Norwood Commercial Area	No change	Member of the public	Retention of the old college site within West Norwood KIBA, now vacant for 21 years, is indefensible.
27. West Norwood Commercial Area	No change	Politician	Many units currently empty or occupied by churches and mosques which suggests the current demand for large industrial units at current rent levels is declining. The former community college is also unused. This area could possibly be invested in by the council to develop more suitable modern workspaces for say food/brewing businesses, low-scale manufacturing, modern digital-based companies. For planning purposes any conversion of B1/2/3 to residential must provide suitable evidence of marketing effort regardless of location.
27. West Norwood Commercial Area	No change	NJL Consulting on behalf of Cashco	Cascho have a site located within the West Norwood Commercial Area. Having carefully reviewed the Manual for Delivery, it is considered that there are findings within the manual which suggest that the Commercial Area is not fulfilling its intended role as effectively as it should be. Consideration should be given to the release of sites from West Norwood Commercial Area is not fulfilling its intended role as effectively as it should be. Consideration should be given to the release of sites from the West Norwood Commercial Area KIBA for alternative uses or the relaxing of restrictive policies to allow for the inclusion of mixed use developments which will ensure that sites within the Commercial Area are not underused or vacant, as acknowledged within the Manual for Delivery. The introduction of more flexible policies relating to development within the KIBAs would ensure that sites, especially those towards the edge of the KIBAs, in prominent locations, do not remain vacant or underused, whilst meeting the development needs of the Borough. Where a site is located on the edge of the KIBA its redevelopment and use must be sympathetic towards the surrounding uses outside of the KIBA, which may include residential dwellings or other more sensitive uses, therefore, by relaxing the policies for development within KIBAs, mixed use development could come forward in such locations, which would benefit both the KIBA, and also the surrounding areas.
27. West Norwood Commercial Area	No change	Member of the public	Encourage more mixed use environments that do not separate work and living space, but maximises the optimal use of both. Mixed use prevents 'dead zones' that plague many segregated environmental spaces and mixed KIBA are the healthiest way forward to prevent unnecessary ghettoization. Finding innovative ways to improve communities and environments requires new approaches to improve community dynamic thus multiple and creative use of space should be supported. New and collaborative

			mixed methods can help to innovate and improve quality of life. Mixed KIBAs and a creative philosophy behind mixed and multiple use spaces are necessary - Lambeth should look at how we can expand these approaches.
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Table 3: Survey responses and written responses regarding proposed new KIBA designations

Key Industrial Business Area	Issues Proposal	Respondent	Summary of comments
31. Knollys Yard	New	Member of the public	Any increase in the amount of traffic will negatively impact on all residents on our road. If the site were redeveloped it would require road access to Leigham Vale. Any change in current use needs widening of the railway bridge, where the present entrance is - this will increase traffic on York Hill which is narrow and steep. Knollys Road Residents' Association are interested in a mixed-use development however a single footbridge to Leigham Vale will not offer a sustainable solution to vehicle access to this site, whatever use it becomes. If designated, a tunnel/underpass can be built as has been suggested by London Travelwatch.
31. Knollys Yard	New	Member of the public	More information required as this could have a damaging impact on local traffic congestion, noise and light pollution. The site is in a very poor and unsafe state. Much investment is needed to make the yard viable and suitable with good access.
31. Knollys Yard	New	Ekaya Housing Association	Ekaya Housing Association own property and land at 177 Knolly's Road adjacent to the entrance to Knolly's Yard. Current uses on the yard do not have planning permission but have been established on a piecemeal basis over the last two decades. The occupiers have erected temporary structures. A number of shipping containers exist on the site. These structures, are frequently moved and/or re-built. The site is subject to dumping of waste materials. The 3.1m headroom prevents access to the site by fire engines and refuse vehicles. Scaffolding lorries are unable to enter the site and use Camron Place and the car park to the rear of our property to load and unload their lorries. There is no pavement through the underbridge making pedestrians extremely vulnerable. KIBA land provides a stock of cheaper accommodation for noisier, dirtier businesses. Redevelopment of business space outside KIBAs for housing is allowed providing new small business space is included in the new development – these are a concern. The single entrance to the site is next to our properties, so any increase in vehicular activity would be a (safety) concern. This is notwithstanding the surrounding residential road network, the bridge cannot be built to accommodate the headroom for HGVs or uses identified as suitable for KIBA land.

			For allocation of such sites, the GLA requires them to offer potential for 24-hour working, or provide facilities for 'bad neighbour uses' without detriment to residential amenity, being well screened from neighbouring uses, particularly residential areas. The site could not offer 24hr working given access. Aware of noise and disturbance to local residents, particularly by way of loading and unloading of scaffolding on residential streets and strongly object to the proposed designation.
31. Knollys Yard	New	Be (Living Ltd)	This site comprises mostly of the new KIBA land but it is not viable as a KIBA. The KIBA review document fails to acknowledge outline planning permission for 147 residential units. KIBA use would be unviable due to costs associated with the upgrading of the under bridge. Work has demonstrated that a mixed use development is required to bring this site forward. Excluding residential would limit any potential funding the infrastructure. Network Rail and the DfT have confirmed the site is surplus to operational requirements and can be used for housing. The site has been identified as one of the top ten Network Rail sites to assist in the delivery of 160,000 homes on public sector land. The site is poorly located with regard to infrastructure and the road network can't accommodate KIBA related vehicles. The 3.1m headroom prevents access to the site by fire engines and refuse vehicles. There is no pavements through the underbridge. Network Rail have confirmed that 4.3m bridge heath is required for either industrial/warehousing development or residential access.
31. Knollys Yard	New	Built Environment Communications Group	Submission of 55 cards gathered at a public consultation event held on 2nd December for uses for Knollys Yard. These cards express concern about Lambeth's proposals to designate Knollys Yard as a KIBA and ask the council to instead support homes for rent on the site, in addition to a work hub and footbridge. "Dear Councillors, I would like Knollys Yard to be a vibrant new place to live, work and relax. Please support the early ideas to create: • A work hub to bring together new and small businesses with a focus on the arts, create and technology industries • Much needed homes to rent • Improved pedestrian and vehicular access and a new foot bridge connecting Tulse Hill and Norwood High Road directly to the site • Café/ Bistro, Restaurant and Craft Brewery • A crèche" Other points on the postcards were also made: • Needs to be well-designed • Nothing is possible without a 2nd exit • A great opportunity to create something to benefit the community so please don't convert this area into an ugly industrial estate

			• The area needs new, affordable homes and space for local enterprises to grow, not an industrial estate. • The crèche should have space for senior citizens and pre-schoolers alongside each other. • A recycling centre in Knollys Yard is not feasible. • The footbridge should be positioned to improve on-foot journeys to school. • No need for a KIBA on this site. • It should not be developed for homes only for the rich. • It is all dependent on restoring a vehicular route to Leigham Vale, otherwise there is too much traffic. • Concern about the site being used for waste disposal. • Large lorries would be dangerous as access is on a bend. • Mixed-use residential is better than a commercial area but still concerns about insufficient parking and site access.
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7. Do you have any other comments?

Survey responses

Four respondents provided other comments related to the Business and Jobs survey. The comments can be summarised as the following:

- There is a need to re-balance the loss of crucial business sites to residential, with the problem not only being the loss of sites but the knock on effect on the rent value of the space that is left.
- Workspace should be kept close to housing to reduce the footprint between where people live and work.
- Hold detailed consultations locally with detailed proposals in order to release their impact.
- The council should as far as possible ensure that every new development, especially those with an office element, have a modern super-fast internet broadband connections.

Written responses

S P Planning, on behalf of Lexadon Properties Limited, highlighted that there could be a 170,000sqm uplift in employment floorspace in the borough by the beginning of the plan period (2020). Alongside a significant increase in the supply of office space in the Nine Elms area and increases in business rates and changes in working practices, the developer argued that this is likely to result in more efficient use of space, reducing the need to retain old, poor quality and poorly located employment floorspace. As a consequence of this, they claimed Local Policy ED2(b) should be amended with the requirement of marketing evidence limited to cases that would involve the loss of decent quality and accessible employment space.

The Brixton Society argued that token provision for employment space is often included in residential-led developments, but much of it is not fit for purpose, is rarely designed for any specific target market and so the resulting low take-up gives developers an excuse to come back and seek consent for its change to residential use. To accommodate a range of services and processes locally, it was suggested that some workspaces will not be suitable for close proximity to residential sites, so space must be reserved in the Local Plan for the continuation of functions like vehicle repairs, waste handling and recycling activities. Key types of business space required were identified in the Brixton Economic Action Plan. The Society stated that there needs to be provision for firms to develop and expand locally, which is the beneficial stage for the wider

community when firms move from start-up enthusiasts to employers of significant numbers of local people.

Site specific comments

Site	Respondent	Summary of comments
Travis Perkins: Balham, Vauxhall and Norwood	Quod on behalf of Travis Perkins Plc	Travis Perkins is the freehold owner of two sites and a leaseholder owner of another site all of which are sui generis builders' merchants within the borough. • TP Balham 2-6 Weir Road, Balham, SW12 0NA – KIBA • TP Vauxhall 77 South Lambeth Road, Vauxhall, SW8 1RJ • TP Norwood 61-79 Norwood High Street, Lambeth, SE27 9JS – KIBA Travis Perkins own and operate a number of builders' merchant branches throughout London. Many of the branches throughout London are in accessible and central locations with good redevelopment potential. Builders' merchants provide an essential service to London's construction industry, providing access to building materials and helping London to build. Builders' merchants operate under a sui generis use. This means that they are often not protected to the same extent as traditional employment uses in the B classes. Many builders' merchants are therefore being lost or are at a high risk of loss to residential, retail and office uses throughout the city. Builders' merchants can operate alongside residential and other uses, however these representations seek to ensure that the builders' merchant use is retained in a mixed use redevelopment. The policies within the Lambeth Local Plan Review should offer more support and protection to sui generis builders' merchants and similar uses which do not fall within the B Classes. This would be in line with the Draft London Plan's objective of retaining industrial and related land in Lambeth. Policy ED1 (Key industrial and Business Areas) seeks to ensure that, in addition to Class B1/B2 and B8 uses that other compatible industrial and commercial uses ancillary to, or providing for, the needs of the KIBA are also protected. This is a step in the right direction and welcomed. However, there is no glossary definition of "other compatible industrial and commercial uses ancillary to, or providing for, the needs of the KIBA". Paragraph 6.8 of the supporting text provides a definition, stating: "Other compatible industrial and commercial uses ancillary to, or providing for, the needs of the KIBA' includes non-B class uses usually associated with industrial areas such as builders' yards, haulage, employment-training, bus garages and telecommunications". This definition acknowledges that there are many uses in the borough that do not fall within Class B of the Use Classes Order but are invaluable to the local economy, such as builders' yards, that create important local jobs. As such, there is clearly an intention from LBL to protect sui generis builders' merchants, however a definition set out in the supporting text of a policy does not provide enough protection. The definition within paragraph 6.8 should therefore be set out in the Glossary of the Local Plan Review so that it is clear that Policy E1 is seeking to protect these important economic uses and to ensure that no loopholes existing for developers to remove these uses through redevelopment. Part (b) of Policy ED2 seeks to protect employment-generating <i>sui generis</i> uses. However within the policy, part (e) fails to ensure that similar <i>sui generis</i> uses must be re-provided where a <i>sui generis</i> use is lost. Part (e) of policy ED2 currently states: "Where a site last in B class and/or employment-generating sui generis use has been cleared, redevelopment will be permitted only where it provides B class floorspace to replace the previous quantity of floorspace if known, or

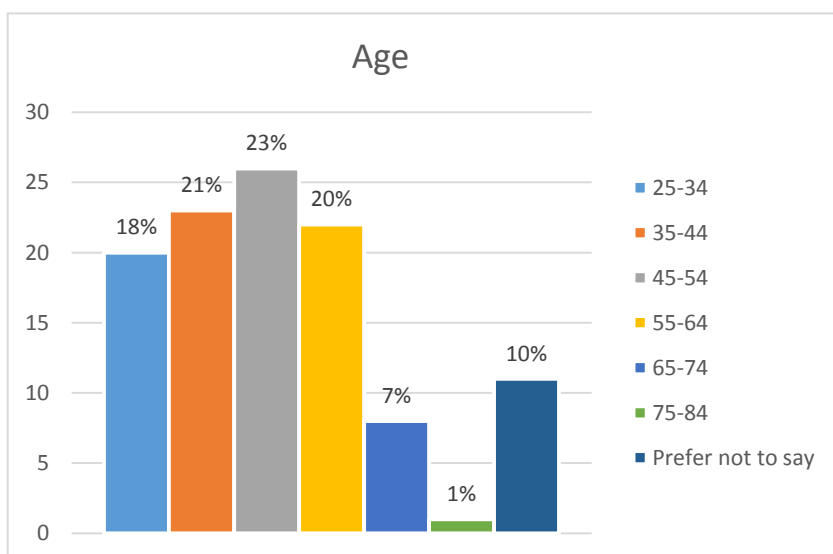
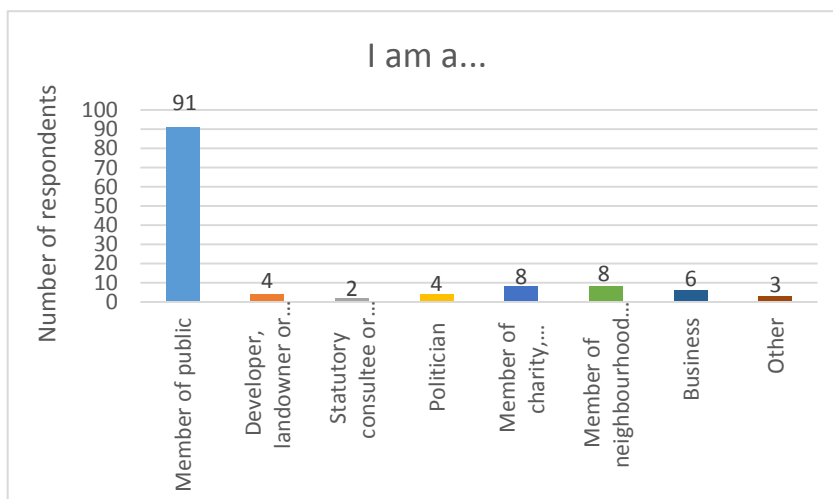
		otherwise provides the maximum feasible proportion of B1 floorspace for the site”. As currently drafted, employment-generating sui generis uses can be lost in redevelopments without any requirement for it to be replaced at all. TP has two freehold and one leasehold sui generis site in the borough. They have been approached on all three sites in relation to the possibility of redevelopment. However TP operates a successful builders’ merchants business and their sites, particularly their leasehold sites, are at risk of being lost to residential or other uses. The following rewording of policy ED2 part (e) would ensure that a developer would be required to replace the existing builders’ merchant floorspace within any redevelopment: This section of policy ED2 should therefore be reworded to state: “Where a site last in B class and/or employment-generating sui generis use has been cleared, redevelopment will be permitted only where it provides B class and/or an identical employment generating sui generis floorspace or offers a relocation site with similar rental/lease levels to replace the previous quantity of floorspace if known, or otherwise provides the maximum feasible proportion of B1 floorspace for the site”. The suggested wording will ensure that sui generis uses such as builders’ yards will be protected fully within Policy ED2 and that this use can be re-provided in a mixed use redevelopment. Travis Perkins has three successful branches within the London Borough of Lambeth and through these representations, seek to ensure that their business is provided policy support and protection within the revised Local Plan. It is clear that the intention is there to protect sui generis builders’ yards and similar uses, the revised Local Plan does not go far enough to ensure that existing sui generis occupiers are given sufficient protection, particularly on non-KIBA redevelopment sites. The amendments suggested will ensure that a sufficient level of protection is afforded to these uses.
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3.9. Town centres

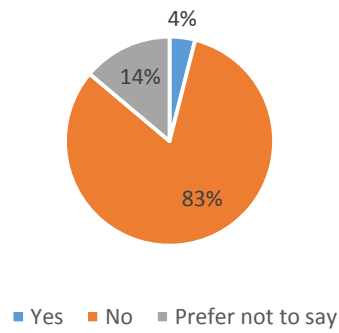
In response to the 'Town centres' survey, 111 responses were received. A total of 13 written responses, including statutory consultees, was received.

Survey responses

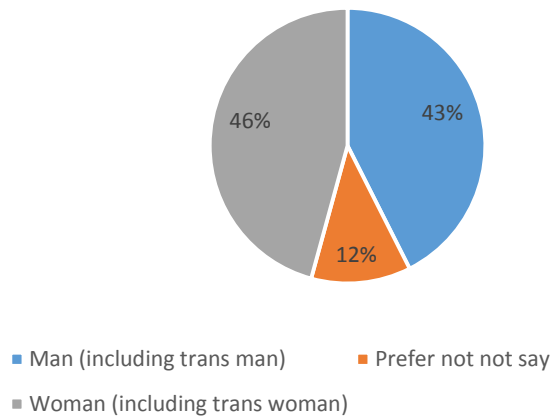
- The majority of responses for the Town Centres survey identified as being members of the public. The second largest groups of respondents were members of a charity, community or faith group and a member of a neighbourhood forum. Three respondents identified as being 'other', which included a Business Improvement District Board Member and Campaign for Real Ale. It should be noted that some respondents identified as belonging to more than one category.
- 39% of respondents identified as being between the ages of 25 to 44. 23% identified as being 45-54 and 20% identified as being 55-64. 8% of respondents identified as being over the age of 65.
- The majority of respondents said they did not have a disability or live with anyone with a disability.
- 46% of respondents identified as being a woman and 43% identified as being men. The remaining respondents preferred not to say.
- The majority of respondents identified as being White British, with the second largest group identifying as being an Other White Background.



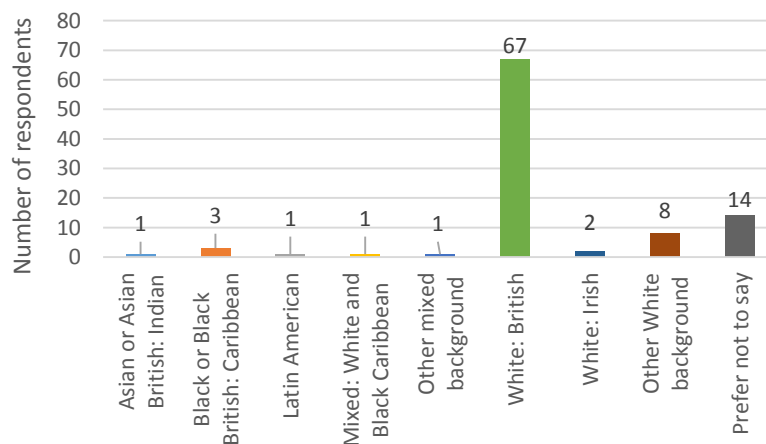
Do you, or does anyone living with you,
have a disability?



Gender



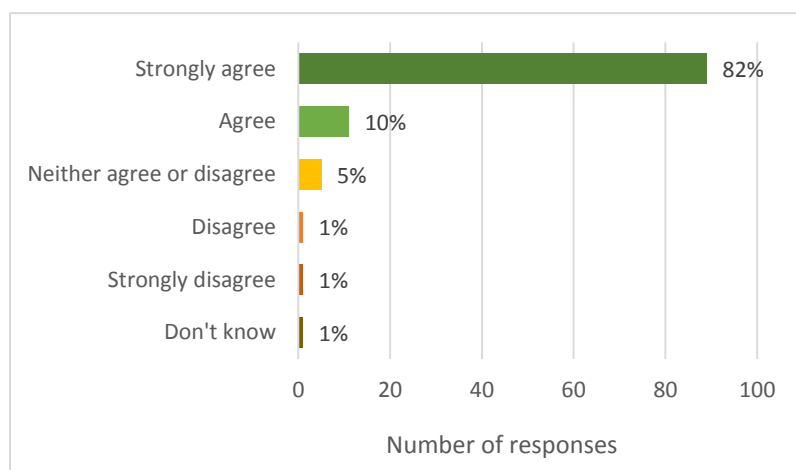
Ethnicity



1. We can now have greater control over changes of use to betting shops through Local Plan policies to reduce negative impacts on town centres and public health. We should limit the number of betting shops that can be grouped together in one place. To what extent do you agree or disagree with this statement?

Survey responses

108 responses to the question were received, with the majority of respondents strongly agreeing that the number of betting shops should be limited (82%). 10% of respondents agreed, 5% neither agreed nor disagreed and 1% didn't know. Only 2% of respondents either disagreed or strongly disagreed.



Of the respondents who agreed or strongly agreed with controlling betting shops, nine respondents commented on the negative impacts of betting shops on the surrounding area. The respondents argued:

- Betting shops can attract people who are intoxicated or have an addiction, creating an unpleasant environment.
- Betting shops are unpleasant to walk past.
- Betting shops can be male dominated and intimidating.
- Betting shops are a hub for anti-social behaviour and crime, mostly involving men, which is a particular problem in Streatham Hill.
- Betting shops damage town centres and local communities.
- Betting shops take up space that could be used by more useful shops.
- Betting shops don't provide active frontages.

15 respondents felt that betting shops have a negative impact on people who take part:

- Betting shops are detrimental for the whole population.
- Betting shops highly exploitative and damaging to health.
- Betting shops are gambling establishments and have a negative impact on those who take part.
- Betting shops cause financial distress and social harm.
- Betting shops target the most vulnerable and the poorest members of society.
- Betting shops encourage people to spend money they don't have.
- Betting shops encourage gambling addictions, mostly driven by the Fixed Odds Betting Terminals which generate massive profits.

One respondent commented that there are too many betting shops already and three respondents provided suggestions regarding how betting shops could be controlled:

- Betting shops should be omitted from the borough entirely and no more should be given a license.
- The numbers of betting shops should be reduced.

Five respondents felt that clustering was a problem, with one respondent suggested that only one betting shop should be allowed per location. Some respondents suggested that betting shops should be encouraged to work with Business Improvement Districts, the council should ensure self-referring schemes for people suffering from gambling addictions and that all betting shops should adhere to the responsible gambling code. However, two respondents noted that people will still be able to gamble online.

A respondent who strongly disagreed argued that betting shops create jobs whilst the respondent who neither agreed nor disagreed did not believe that betting shops are a major issue.

Written responses

Members of Clapham Park Forum strongly agreed that Lambeth should limit the number of betting shops that can be grouped together in one place as did a response from the Clapham Park Project. The Brixton Society also agreed that numbers should be limited and concentrations of these uses avoided.

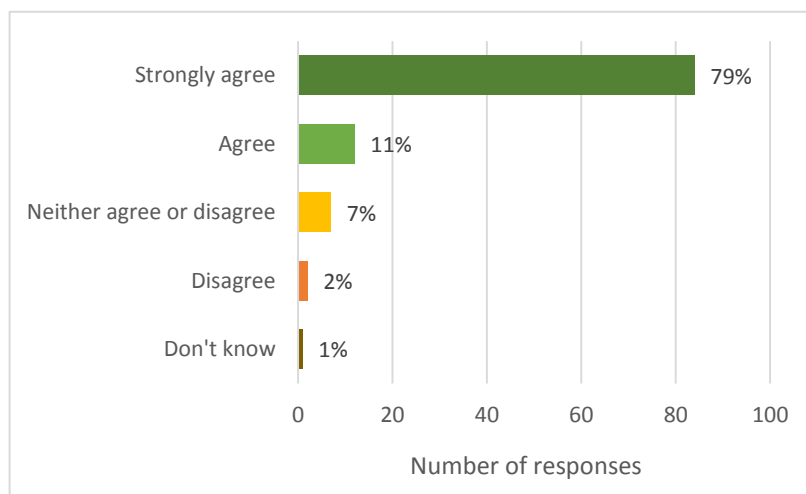
Statutory consultees

Wandsworth Council agreed with controlling betting shopping but would welcome further discussions as without a joint approach in the shared centres, these uses may located in the Wandsworth side of shared centres.

2. We can now have greater control over changes of use to pay-day loan shops through Local Plan policies to reduce negative impacts on town centres and public health. We should limit the number of pay-day loan shops that can be grouped together in one place. To what extent do you agree or disagree with this statement?

Survey responses

106 respondents answered this question. The majority of respondents either strongly agreed (79%) or agreed (11%). 7% neither agreed nor disagreed and 1% didn't know. Only 2% of respondents disagreed with limiting the number of pay day loan shops.



Of the respondents who agreed or strongly agreed with controlling pay-day loan shops, seven respondents commented on their impact on the surrounding area, including:

- Pay-day loan shops serve as a hub for antisocial behaviour.
- Pay-day loan shops are unpleasant to walk past.
- Pay-day loan shops take up space that could be used for more 'relevant' shops such as chemists.
- Pay day loan advertising has become rife.

Seven of these respondents commented on the impact of these uses on the population, including:

- Pay-day loan shops are detrimental for users.

- Pay-day loan shops target the most vulnerable people or those with financial difficulties and end up making financial situations worse, particularly for young people as the cost of living increases.
- Pay-day loan shops cause financial distress and social harm.
- Pay-day loan shops have a negative impact on the whole population.
- Pay-day loan shops are highly exploitative and damaging to health.
- Pay-day loan shops are nothing more than legalised loan sharks.

Respondents argued that pay day loan shops grouped together mean that people who use them can rotate between them and an overconcentration of a specific type of shop in an area does not result in a well-balanced high street that attracts a wide range of customers. One respondent would like to see just one pay day loan shop in each location whilst another would like them to be limited to a maximum of 1% per town centre. Another respondent advocated banning all of them and another highlighted that there are similar options now available online.

Three respondents offered other suggestions for dealing with pay-day loan shops:

- Helping poorer people to manage their finances without resorting to pay day loans.
- Creating advice centres on high streets to assist those getting into debt.
- Encouraging credit unions and other companies providing financial support at low interest rates.
- Using planning to overcome the pitfalls of pay day loan shops.

The respondent who strongly disagreed or disagreed with controlling pay day loan shops commented that pay-day loans provide a useful service for some people and can help cash flow issues.

Of the respondents who neither agreed nor disagreed, one respondent said that they would rather have none but believed that having several grouped together may increase competition and result in better terms. The Streatham Society argued that these uses are no better or worse from a planning perspective than other financial institutions and using planning to clamp down may drive people to loan sharks.

Written responses

Members of Clapham Park Forum strongly agreed that Lambeth should limit the number of pay day loan shops that can be grouped together in one place. Clapham Park Project also strongly agreed. The Brixton Society agreed that numbers should be limited and concentrations of these uses avoided.

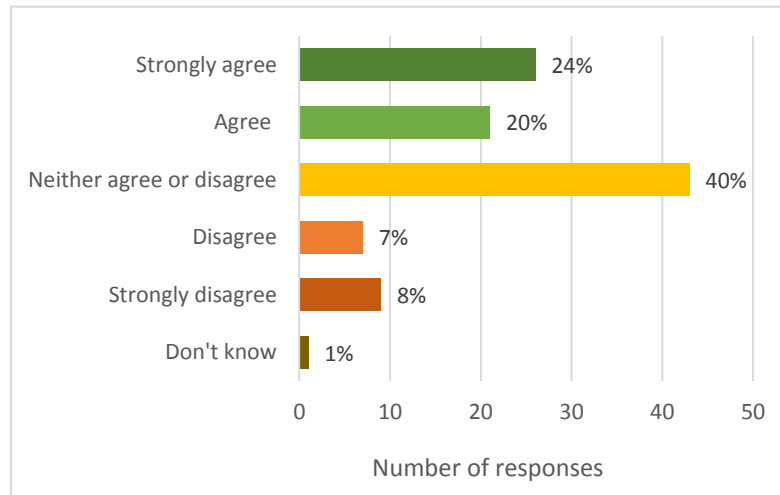
Statutory consultees

Wandsworth Council agreed but would welcome discussions towards a joint approach in shared centres as this could push these uses to open in the Wandsworth side of shared centres.

3. We need a policy to limit the proportion of banks, building societies, estate agents and other 'financial and professional services' (A2 uses) within town centres. To what extent do you agree or disagree with this statement?

Survey responses

107 responses to the question were received. The majority of respondents strongly agreed or agreed that a policy is needed to limit the proportion of A2 uses (44%) whilst 40% said they neither agreed nor disagreed. 7% disagreed, 8% strongly disagreed and 1% said they didn't know.



Of the respondents who agreed or strongly agreed, 12 of these respondents argued that there was an issue around the number of estate agents rather than other A2 uses. The Streatham Society felt that estate agents are outbidding retailers for prime frontages and this has led to distorted commercial property values.

Two respondents stated that there are too many estate agents in Kennington Cross and not enough useful shops such as chemists and independent food retailers. The respondents also commented that banks are closing to the detriment of customers and building societies and credit unions should be encouraged in their place.

One respondent commented that Streatham is full of estate agents and charity shops whilst three respondents argued there is a need to have a blend of different shops and uses on a high street. Clapham BID commented that the clustering of A2 uses can prevent a greater mix of shops from opening in the area.

Of the respondents who disagreed or strongly disagreed with a limit on A2 uses, the following benefits of having A2 uses on the high street were highlighted:

- A2 uses are day time businesses that can help attract more daytime custom which is needed on some of the smaller high streets.
- A2 uses employees help to service A1 and A3 businesses.
- A2 uses tend to be long serving businesses on the high street, create a more stable, healthy variety and mix with other types of shops and services and can help provide good community links within the local area.
- A2 uses pay their business rates without much trouble.
- Uses such as banks are useful.
- A2 uses provide a display of urban renewal with smart shop fronts.

Two respondents highlighted that many of these types of services are changing with more available online so there is a broader issue of whether high street banks are still needed and whether there will be a natural change from A2 to other types of services. Other respondents argued that estate agents are not damaging to individuals, the community or the local economy but high number of them are not welcomed.

Brimstone Living stated that the market should dictate the appetite for such uses, not the council, whilst another argued that the council should consider limiting the number of fried chicken shops instead.

Of the respondents who neither agreed nor disagreed, four respondents argued that banks and estate agents are useful and should not be regarded as negatives. Other respondents argued that A2 units self-regulate, are better than having vacant units, encourage people to use the high street and can off-set the increase of on-line banking which can provide a poor service.

Two respondents stated that there were not enough banks, particularly in West Norwood. Three respondents highlighted issue around bank closures:

- Banks and building societies are nationally reducing their high street premises and encouraging on-line banking to the disadvantage of older people and people on low incomes.
- Bank closures are having a negative effect on neighbourhoods.
- Bank branch closures will likely escalate in the coming years allowing scope for new types of businesses to occupy the high street. However with the addition of necessary controls on A3 premises, restricting A2 may cause units to remain empty for longer.

Three respondents saw estate agents as negatives and two would consider limiting them. One respondent highlighted that the concern in Streatham Wells is around the recent proliferation in pawnbrokers and payday loan shops.

Of the respondents who didn't know, one respondent commented that the endless estate agents are an annoyance but wanted banks to stay and not disappear.

Written responses

Members of Clapham Park Forum neither agreed or disagreed that Lambeth should limit the proportion of A2 uses within town centres. The Clapham Park Project also neither agreed nor disagreed. The Brixton Society stated they do not see a reason to limit the number of mainstream A2 uses and claimed that A2 uses appear to be a non-issue because demand from banks, building societies, travel agencies and insurance brokers is already reducing as more business is carried out on-line. They believed that existing policy ED9 is obsolete.

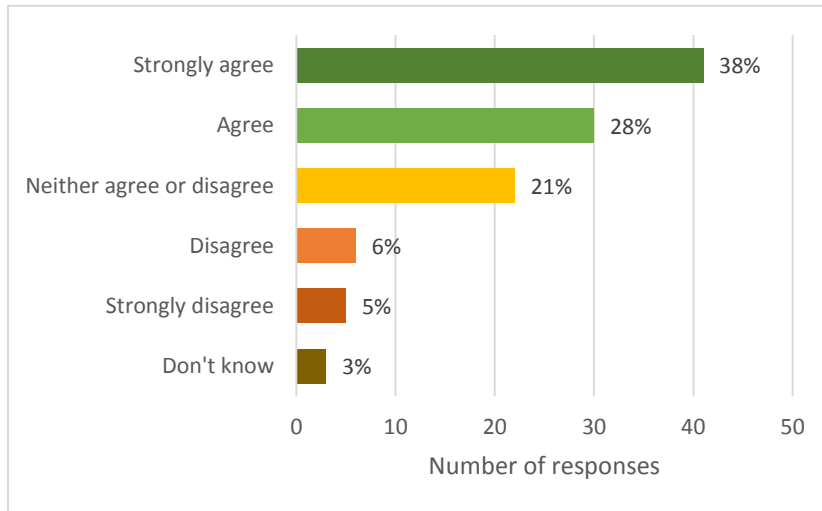
Statutory consultees

Wandsworth Council believed there is no evidence to suggest these uses are impacting on the function of centres in Wandsworth. They outlined that Wandsworth policies require minimum proportion of units in A1 use therefore the shopping function is retained whilst allowing flexibility to respond to market conditions.

4. Change of use from a shop (A1) to a financial and professional service like a bank, building society or estate agent (A2) does not require planning permission. We could potentially remove this permitted development right by introducing an Article 4 direction where we can demonstrate this is causing harm to a town centre. We should remove the permitted development right for change of use from A1 to A2 in locations where this would harm the main shopping function of a town centre. To what extent do you agree or disagree with this statement? If you agree with this statement, which town centre(s) should be a priority and why?

Survey responses

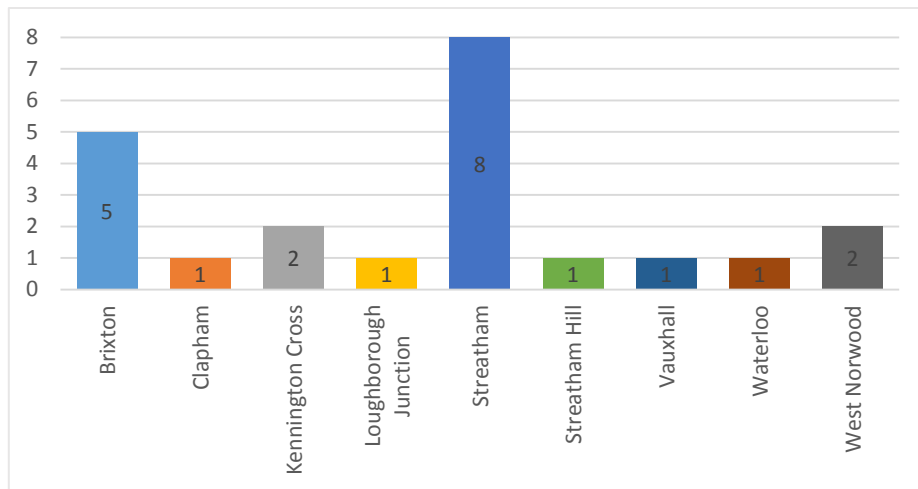
107 respondents answered this question, 38% of whom strongly agreed and another 28% agreed. 11% of respondents disagreed or strongly disagreed. 21% neither agreed nor disagreed and 3% did not know.



Of the respondents who either agreed or strongly agreed with removing permitted development rights, two respondents felt it should apply to the whole of Lambeth whilst another three respondents felt it should apply to all town centres, particularly ones that are not meeting the policy requirements.

Clapham Business Improvement District said the council should be able to manage the types of uses within commercial areas and decide where it considers there to be too many of one style of business. One respondent argued that town centres need diversity and it is important to ensure that there is at least a minimum level of A1 shops. They also commented that it is important for people living or working near an existing A1 that changes of uses are kept within the same use class. If a unit changes from a bank to building society, estate agent or legal firm it may not be an issue but if it changes to a café, fast food outlet or retail outlet there may be problems with noise, business hours, cooking smells or deliveries.

One respondent suggested that each town centre needs to be looked at individually and highlighted that Brixton town centre needs to be able to keep its unique character. The Loughborough Junction Action Group stated that all town centres should have this degree of control but queried whether Article 4 directions are only permitted in Conservation Areas. One respondent stated that Lambeth needs more banks and another respondent suggested one bank and/or building society per shopping street and also stated that estate agents do not need to be so widespread.



Eight of the respondents who agreed felt that an Article 4 Direction should apply to Streatham, with the Streatham Society recommending that it focusses on the Streatham Hill area. The following reasons were provided by respondents:

- There is a proliferation of estate agents which limit more useful and desirable businesses.
- There is no problem with banks and estate agents but Streatham doesn't need anymore.
- There is a need for a better mix of shops.
- Streatham main drawn is retail and permitted development rights have reduced the retail mix and will reduce footfall and impact upon the overall shopping draw of the town centre.
- Streatham is so long it needs help as areas are dying and due to the A23, businesses struggle to attract local shoppers so more A1 businesses are needed to encourage local residents to shop locally.

Five respondents suggested an Article 4 Direction should apply to Brixton, including the Streatham Society. The following reasons were provided by respondents:

- There are already enough estates and Brixton will become sterile.
- It is a central area where the community is important and more shops improve community opportunities.

Two respondents felt that permitted development rights should be removed from West Norwood as the centre seems to be increasingly dominated by estate agents but there is a need for more banks.

Three respondents felt the proposal should apply to Kennington Cross as there are too many estates agents and there is not enough variety in local shops, such as chemists.

Respondents who suggested Waterloo argued that due to the intense pressure from hotels, every effort needs to be made to preserve the shopping character of Lower Marsh.

Another respondent suggested that Loughborough Junction should be a priority and suggested the retail centres within St John's Angell Town.

Written responses

Members of Clapham Park Forum agreed that Lambeth should remove the permitted development right for change of use from A1 to A2 in locations where this would harm the main shopping function of a town centre. The Clapham Park Project also agreed.

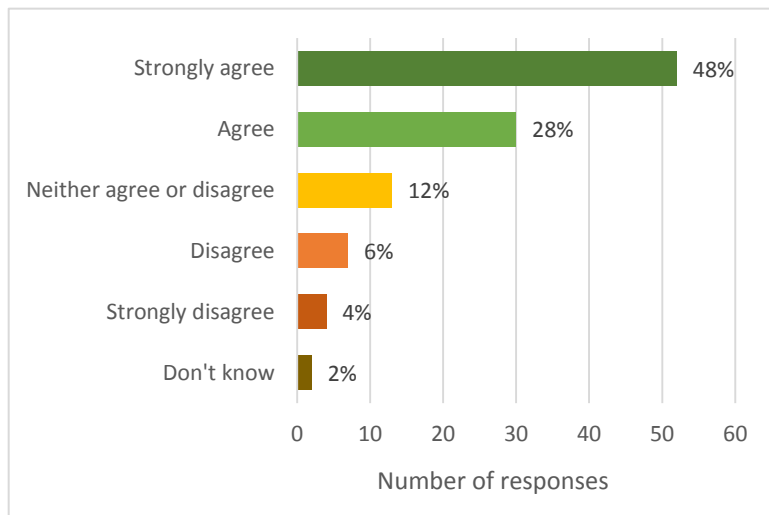
Statutory consultees

Wandsworth Council agreed with the approach and stated that Wandsworth have this type of direction in force in protected shopping frontages and Important Local Parades where policies require minimum A1 uses. They offered to share experience and evidence on this matter.

5. We can now control the change of use of pubs to shops and other uses. We should add to our existing Local Plan policy on pubs to require applicants to demonstrate that a pub is no longer needed before this type of change of use is allowed. To what extent do you agree or disagree with this statement?

Survey responses

108 respondents answered the question and the majority strongly agreed or agreed (76%). 12% neither agreed nor disagreed and 10% either disagreed or strongly disagreed. 2% did not know.



Of the respondents who either agreed or strongly agreed, six respondents commented that pubs are a valuable resource for communities and are important in local neighbourhood town centres. Others commented that there is a need to keep a mix of businesses in an area to attract people to keep the local economy health and pubs contribute to the diversity of a town centre.

Two respondents already thought that it was already a requirement to demonstrate that a pub is no longer needed for a change of use is allowed, with the Campaign for Real Ale (CAMRA) saying that it wouldn't hurt for this to be included in the Local Plan. CAMRA also commented that deciding on a pub's viability is fraught with difficulty and developers who are seeking to make large profits on changes from A4 to residential are likely to advance any arguments to try and convince planners that "a pub is no longer needed". They noted that Lambeth already supports the retention of traditional pubs and advised the council to remain vigilant on this.

One respondent highlighted that current policy ED8 needs to be strengthened as it is too easy for a pub to change use by stealth. Respondents commented that residential is permitted above pubs with new constraints on the pub to protect the residents from noise which impacts on the pub's viability and supports arguments for a full change of use to residential. One respondent gave an example of the Beehive on Crossford Street which used to be an Asset of Community Value but is now flats. CAMRA provided an example of the Grovenor pub which was not allowed to become flats at planning committee but the appeal went above elected councillors and is permitted. This issue needs to be addressed so that all pubs do not become flats and valuable community assets are not lost.

Three respondents, including the Streatham Society, complained that too many pubs had been lost in this way to unscrupulous residential property developers, with one highlighting that it negates current or future community use. Another respondent argued that Lambeth has lost so many pubs though new drinking establishments starting up in arches and shops, while suitable pub premises with suitable cellars access are being turned into shops.

One respondent commented that it's a shame to lose so many pubs acknowledging whilst some need to close, where there is a design interest or historical context, it should be resisted. The Loughborough Junction Action Group suggested the council could encourage local groups to register pubs as assets of community value, whilst another respondent outlined that Lambeth should consider a borough wide assets of community value status for all pubs.

Three respondents commented that any change of use must be properly consulted on with the local community to ensure that a pub's local need is assessed accurately. It was suggested that this should be done through workshops with harder to reach groups, in addition to formal consultation channels. Another respondent suggested that the council should take account the possible change in social habits.

A number of issues were raised by respondents who either disagreed or strongly disagreed, including:

- Pubs are central to the community and should be retained and supported.
- Lambeth does not need to protect its pubs as inner London is full of them and pubs in Lambeth are not at the heart of the community nor a necessity.
- The council should be relaxed about re-development of pubs where the developer puts forward a viable scheme that will increase the supply of housing. Special protections for pubs should be kept to a minimum.

Of those who neither agreed nor disagreed, respondents considered that the wide scale change of use of old fashioned pubs was considered wrong because pubs are a source of community interaction. They also suggested that as long as a licence is monitored and residents are made aware of the pub being a well-used facility when they move nearby then they cannot expect a licence to be revoked. Another respondent suggested that bars are sufficient.

Written responses

Members of Clapham Park Forum agreed that Lambeth should add to existing Local Plan policy on pubs to require applicants to demonstrate that a pub is no longer needed before this type of change of use is allowed. However the forum did not want to see pubs converted to housing irrespective of any needs analysis and were keen to see pubs converted for cultural purposes i.e. theatre and galleries. The Clapham Park Project also agreed with the proposal.

The Brixton Society outlined that generally, the loss of public houses should be resisted and that those that host entertainment or other activities are particularly valued, provided that opening hours are reasonable in the context of neighbouring uses. They argued that some pubs have been rendered unviable by residential development being allowed above or adjacent, without consideration of the existing use. On behalf of UDN Properties Limited, CGMS stated that there is clear policy support at a strategic level for the protection of public houses and agreed with this approach.

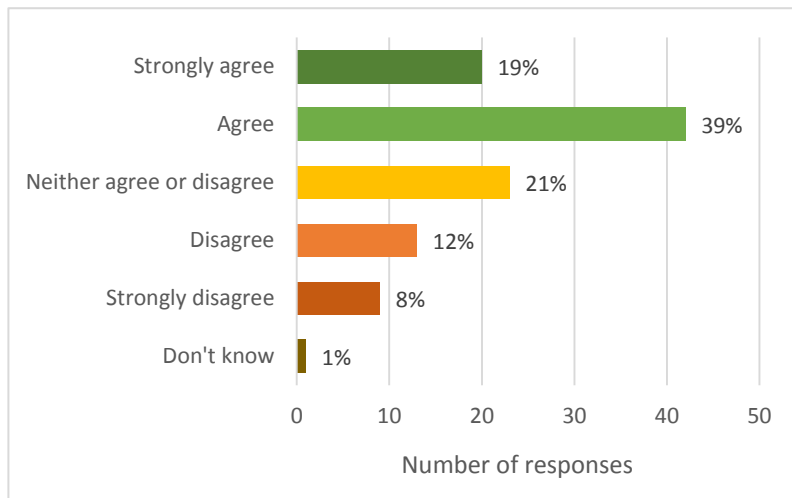
Statutory consultees

Wandsworth Council offered to share the criteria for pub protection contained in Wandsworth Town Centres Supplementary Planning Document.

6. Nightclubs make a positive contribution to culture and the night-time economy in Lambeth. To what extent do you agree or disagree with this statement?

Survey responses

108 respondents answered this question and 58% of them either agreed or strongly agreed. 21% of respondents neither agreed nor disagreed. 20% either disagreed or strongly disagreed. 1% of respondents did not know whether nightclubs make a positive contribution to culture and the night-time economy.



Of the respondents who either agreed or strongly agreed, two supported nightclubs as they attract many people nationally and internationally. The Streatham Society felt that they generally make a valuable contribution to Lambeth but noted that the minority of poorly managed clubs, particularly those under residential blocks, cause reputational damage to whole sector. Other respondents argued that they have significant cultural value, add to Lambeth's vibrant culture, bring in income, are regulated environments for young people and keep the streets safer by encouraging more people to be around late at night.

Other respondents who agreed that nightclubs make positive contribution argued that:

- Lambeth needs night life and the Royal Vauxhall Tavern, 414 in Brixton and other existing well-loved clubs should be saved.
- There should be a nightclub similar to Electric Brixton in Streatham to improve its night time economy.
- There should be a density test to limit the numbers in town centres.
- Music venues for live music and recorded music should be supported as well as night clubs.

Eight respondents who agreed would only support nightclubs in certain situations, for example if:

- Nightclubs are not permitted to stay open beyond 2am.
- Steps were taken to mitigate noise, litter, traffic and anti-social behaviour.
- Nightclubs were only located in certain locations, for example where there is appropriate infrastructure is in place/ away from residential uses.
- Nightclubs are required to provide effective, higher quality than currently, noise insulation and crowd control than currently required.
- If nightclubs are in suitable premises, not in parks or pop up venues as open air noise can be a problem for neighbours.
- S106 monies are provided for community safety.
- Residents' quality of life is taken into account, especially in town centres or in close proximity to numerous licensed and A3 use premises.

Of the respondents who disagreed or strongly disagreed, many respondents highlighted some of the perceived negatives of nightclubs, including:

- Too many customers who do not respect the area or the people who live in it and the balance between residents and nightclubs needs to protect residents.
- Nightclub users in Brixton make too much mess.
- Nightclub users cause issues for local residents through noise and disturbance that outweigh any positive contributions to the local economy.
- Nightclubs encourage drinking and drug use, especially amongst young people.

Two respondents felt that nightclubs do not have significant cultural value whilst another argued that it is entirely dependent on the context, location and clientele. One respondent commented that there are enough night clubs in Lambeth already and no more are needed and one suggested that the council should learn from Clapham and limit the potential impacts in Streatham. One respondent felt that the night time economy doesn't have to be limited to just night clubs.

Of the respondents who neither agreed nor disagreed, one respondent questioned whether nightclubs benefit the community but said they should be allowed if they are run well, controlled and people wish to attend them. Two respondents outlined that nightclubs should be near to a transport link so that there is little impact on local residents, whilst another suggested they should not be permitted in residential areas. One respondent suggested that Lambeth has reached saturated point in areas such as Brixton.

Guys and St Thomas' Charity acknowledged that when well-managed, night clubs can help deliver a vibrant mixed use development that has positive impacts on the night time economy and leisure activities but when they are managed poorly, can result in anti-social behaviour and become an un-neighbourly use.

The Loughborough Junction Action Group stated that noise associated with the night time economy is a problem in residential areas and argued that where nightclubs are encouraged, there should be a Saturday and Sunday morning clean-up of street waste and litter.

Written responses

Members of Clapham Park Forum agreed that nightclubs make a positive contribution to culture and the night-time economy in Lambeth but argued that they need to be well managed. Clapham Park Project neither agreed nor disagreed.

The Brixton Society argued that in a Brixton context, any policy must also cover major entertainment venues and "vertical drinking establishments" (A4 use generally). They stated that the council has failed to plan for the implications associated with nightclubs or to impose or enforce appropriate conditions when granting planning permissions and licences. Brixton has been attracting more residents because of its public transport links and that a conflict is inevitable, with anti-social behaviour issues and noises from customers leaving bars and venues and from unlicensed buskers, hawkers and preachers operating late at night. Vehicles trying to clean up after street traders and visitors also add to the noise disturbance. The Brixton Society suggested that A3, A4 and A5 uses' hours of operation should be more tightly restricted, particularly for night hours close to residential buildings.

Statutory consultees

The GLA stated that Lambeth should protect and promote cultural venues including pubs and the night-time economy inline with draft new London Plan policies HC5 Supporting London's culture and creative industries, HC6 Supporting the night-time economy and HC7 Protecting Public houses. Lambeth was encouraged to strengthen areas with clusters of cultural facilities and designate them as Cultural Quarters and establish Creative Enterprise Zones. They highlighted that Lower Marsh/The Cut has been designated as Night-Time Economy Area of Regional/Sub-regional importance (NT2).

7. The Mayor of London has launched a new cultural programme and we are preparing a bid to be named as the London Borough of Culture. In your view how can the Lambeth Local Plan support the delivery of a cultural programme that aims to transform places through arts, heritage and culture?

Survey responses

66 respondents provided suggestions on how the Local Plan can support the delivery of a cultural programme.

Diversity

- Represent the diverse groups and interests in Lambeth, which will bring different communities together and promote understanding of different cultural issues.
- Ensure there is opportunity for all to attend such events.
- Acknowledge and trace Lambeth's history of popular art (circuses), local poets (William Blake) and immigration through guided walk, exhibitions in libraries, street panels and work with schools.
- Spend equal amounts of money in the south of the borough and not just in the north.
- Act more broadly across areas including Streatham, rather than just focussing on Brixton and Clapham.
- Make use of Brixton's real culture of community, creativity, tolerance and a rich history of music, art, solidarity and protest that has made the area internationally famous and the heritage of the people who live there.
- Make use of local people and history through musical theatre.
- Support a large number of organisations across the borough, rather than a few big ones and support local and individual businesses instead of chains and franchises.

Events and programmes

- Acknowledge the positive impact of curated cultural provision on local residents and recognise the positive impact of culture as an industry and its potential to bring new visitors to the area.
- Provide more clarity with regards to delivering a programme of culture/public art and the aims of a conservation area.
- Encourage performance and public art with competitions for local artists, musicians, and children.
- Promote community based arts festivals. One takes place each year in the southern part of the borough for people who are unable or don't wish to access the Southbank or the theatres in Waterloo.
- Host more street events such as performers, theatre and buskers.
- Encourage more events like Lambeth Country Show, less like Sunfall, which had five-hour queues and demonstrate the unsuitability of Brockwell Park for such events.
- Support small local artists, cultural events and less mainstream projects.

Support existing and encourage new venues and facilities

- Require more heritage interpretation within developments as much history isn't obvious in new developments.
- Support the building or conversion of venues to provide theatrical or exhibition spaces and re-use old buildings, such as the Cinema Museum, rather than demolishing them.
- Showcase picturesque old and modern buildings which housed these activities and old trades.
- Focus on the impact of the river and the hidden tributaries of the Thames
- Encourage small scale community led events, spaces, design and input into development proposals.
- Develop a 'Cultural Quarter' in West Norwood around the existing library, theatre and Portico Gallery, with a new visitor centre on land round Knight's Hill Square.
- Allow pop up 'meanwhile uses' on vacant sites.
- Encourage tree and flower planting and encourage localities to plant containers to allow schools and groups to have a stake in their area.
- Improve walking links and create apps to identify and illustrate the rich heritage or on-going culture in Lambeth.
- Streamline initiatives such as Pop Brixton and parkletts in local streets.

- Allow short-term cultural, arts and heritage projects to overcome conservation and planning regulations in some circumstances.
- Support planning applications which support the arts without developers watering down, for example Streatham Hill theatre.
- More art galleries, theatres, exhibition spaces, concert halls and cinemas instead of just pubs, films and restaurants
- Use empty shop units for pop up galleries, for example the empty 'Chilli Chutney' on Streatham High Road.
- Encourage schools to stage performances open to the public and encourage ongoing education through night schools.
- Support new facilities that could be used to host events.
- Support long established music venues such as the The Windmill, 414 Club, the Electric rather than undermining them for the benefit of recently built hotels.
- Keep the Oval House in Oval or move it closer to the Southbank.
- Stop the redevelopment of economically unproductive but cultural rich places such as the old Cooltan arts centre.
- Support smaller scale venues by allowing live music, spoken word and theatre performances and joining up licensing and planning.
- Support studios, alternative venues and visual art centres.
- Utilise public spaces like libraries and open spaces for outdoor spaces for live performances, community events and food months.
- Encourage artwork or cultural installations in Streatham.
- Provide affordable spaces and allow council tax discount.
- Support the Streatham Theatre by bringing it back into use as Lambeth Arts Centre to provide a cultural hub for the south of the borough.
- Cancel plans to host an unsustainable number of ticketed events in Brockwell Park. Whilst live music events add to Lambeth's vibrant culture, ticketed exclusive events put profit before people and exclude demographics who can't afford the events or are intimidated.
- Expand local markets, for example the current market by St Leonard's Church.
- Support Brixton Market and ensure there is an equal balance between the fruit, vegetable, fish and meat stalls alongside eating outlets.
- Stop closing libraries and converting them into gyms and instead protect them and extend their community use with fulltime, trained librarians.

Financial support

- Encourage more creative and cultural industries in the borough who are being forced out through rent and rate rises.
- Financially support different cultural events and venues with s106 monies before the deadline expires and the money has to be given back to developers.
- Fund more festivals.
- Subsidise orchestras, jazz bands, popular music, dance studios and arts courses.
- Support the South London Theatre.
- Create a Lambeth resident card to allow reduced charge access to South Bank cultural hub and other local theatres.
- Enable BIDs to deliver the programme and ensure that the planning department supports BIDS to deliver projects. For example, Clapham BID have produced a public art strategy and have delivered one installation and would like Lambeth to engage with the strategy and consider how it can assist with its delivery, possible using s106 monies and public art funding.
- If managed correctly and with financial backing to the right kind of organisations, Lambeth could act as the base support.

- Support all Business Improvement Districts efforts in delivering arts, heritage and culture projects, working with TfL, Network Rail and other stakeholders.

Better communication

- Better communicate local culture to stop the creative opportunities in Lambeth feeling like a hidden secret. Events could be listed on a Lambeth Facebook page.
- Visibly promote and advertise venues such as the Black Cultural Archives which hosts interesting events.
- Raise awareness of different cultural values through food and growing, cooking and eating together.
- Ensure a dialogue with companies that have already set up such programmes and see how they can be put into practise and developed.
- Remove all advertising hoardings from high streets to allow for arts, heritage and cultural ideas to flourish.

Q+A Planning Ltd stated that if the council is selected as the London Borough of Culture, the council should ensure a sufficient supply of visitor accommodation throughout the Borough to ensure consumer choice for overnight visitors and affordable prices.

One respondent did not feel that a cultural program should be a priority and instead suggested that money is spent on services for local residents, and/or on improving the transport environment so that people can enjoy the outdoors without fear of fast, dangerous and polluting traffic. Another response stated that all the boroughs make a cultural contribution in their own way and stated that the London Borough of Culture is a gimmick. They encouraged supporting local people in their creation of neighbourhood plans and felt that local people should determine priorities in terms of the local cultural offer. Other respondents suggested that the council pay more attention to reducing air pollution, keeping roads and pavement clean, improving public transport close to secondary destinations and making sure that parking regulations were not burdensome for residents in local centres.

Written responses

Members of Clapham Park Forum supported more culture in Lambeth but were unsure how such culture could be delivered. Clapham Park Project encouraged working with more local groups.

The Brixton Society argued that the greatest threat to the survival of arts, culture and heritage premises is unrestrained housing development, either displacing the original use, or being allowed too close to existing uses without consideration being given to their compatibility. They argued that existing policy on visitor attractions needs to give more guidance on management issues and potential planning conditions, such as handling pedestrian flows of visitors arriving and departing the building.

Statutory consultees

Wandsworth Council welcomed the option to contribute to cultural proposals in Nine Elms and Clapham/Tooting Commons that would result from this designation. The delivery of a cultural programme that aims to transform places through arts, heritage and culture can be achieved in a number of ways and suggested Lambeth refers to Wandsworth's draft Obligations SPD, Nine Elms Strategy, Commons Strategies/Management Plans and Wandsworth's Culture Strategy/Arts coordinator.

8. We are proposing some minor changes to town centre boundaries for the West Norwood district centre and the local centres at Loughborough Junction and Kennington Park Road. We also proposing to replace an existing local centre with a new one in the Clapham Park area. What is your view on the proposed changes?

Survey responses

50 respondents provided comments on the town centre boundaries, with eight of these explicitly supporting the proposals. Three respondents supported them as long as they added value, local people wanted them and more parking opportunities to bring more people into town centres were provided.

Seven respondents had no comment and five stated that they did not know enough to comment. One respondent doubted that Lambeth would implement any positive changes for local residents and presumed that the changes will only benefit business. Another respondent feared that the changes may result in the loss of garages and light industrial units which provide work for many low skilled, low paid workers. If these units are lost and not replaced by similar units, it would have a negative impact on many people who rely on them to provide an affordable service.

One respondent provided comments on the proposed ward boundary changes through the Boundary Commission and argued there would be unnecessary complexities caused for decision-making if the current proposals were enacted and the consultation process was flawed.

Written responses

Q+A Planning Ltd suggested that the council considers the Clapham and Stockwell district centre boundaries as they believed that they are not currently defined in accordance with the requirements of the NPPF. The Brixton Society argued that Brixton's town centre boundaries are illogical and arbitrary changes have been made from time to time to suit the council's development ambitions. The policies are affecting shops and business premises and the boundaries should following the boundaries adopted for the Brixton Business Improvement District, including shops extending westwards along Acre Lane.

GL Hearn on behalf of R&F Properties states that the emerging Replacement London Plan seeks for the first time to prioritise the contribution of culture to the capital. The recently published draft Replacement London Plan emphasises the need for London Boroughs to positively plan for culture and creative industries and sets out key policies which include encouraging the designation of Creative Enterprise Zones, Cultural Quarters and the development of a Cultural Infrastructure Plan. R&F supports such an approach as a positive intervention in seeking to create opportunities for the development of this important sector. The new Lambeth Local Plan should consider positive policies reflecting the approach of the Replacement London Plan in this respect.

Statutory consultees

Wandsworth Council stated that none of the proposed centre boundary changes affected joint centres with Wandsworth and felt that the changes are not significant enough to draw trade. Comments related to specific proposed town centre boundary changes, either through the survey or written response are summarised in table 4.

Table 4: Survey and written responses regarding proposed changes to town centres

Town Centre	Issues Proposal	Respondent	Summary of comments
West Norwood District Centre	Partial de-designation	Member of the public	Agree as long as local residents aren't negatively affected by increased traffic.
West Norwood District Centre	Partial de-designation	Member of the public	Looks interesting
West Norwood District Centre	Partial de-designation	Member of the public	Anything that can have a positive impact on the new designated area of West Norwood (the most depressed and depressing part of the town) is to be welcomed

West Norwood District Centre	Partial de-designation	Member of the Norwood Planning Assembly	This may not be a positive move. The soon to open cinema and refurbished theatre will encourage more activity along Norwood High Street. The council should do more to encourage a diversity of uses including retail, cultural, office, bars and restaurants in this area.
West Norwood District Centre	Partial de-designation	Member of the public	Don't include SE27 0BY in West Norwood.
Clapham Park: Poynders Road Local Centre and Kings Avenue	Full de-designation and designation of new Local Centre on Kings Avenue	Members of Clapham Park Forum	No particular concerns as attendees at the meeting recognised that they are all young and able-bodied and willing to travel.
Clapham Park: Poynders Road Local Centre and Kings Avenue	Full de-designation and designation of new Local Centre on Kings Avenue	Clapham Park Project	Concerns raised. Many people currently use the café for meeting up socially and it's the only one in the west side of the estate. The current shops including the post office, the greengrocers, the chemist, the handyman shop and the Londis all provide essential services for the group of older and vulnerable residents, many of whom have mobility problems and have to use a stick or stroller to get around. They are concerned about not being able to draw out their pension or pay rent and bills when the post office shuts. Although they know they can go to another branch, this will involve getting on public transport, which often involves a long wait and a challenge to get on the bus. A few of the elderly were extremely worried that if they cannot travel to another post office to pay their rent, they will be evicted. None of the group have IT skills or access to IT. For some, walking from Clarence avenue, Clarence Crescent or even the newish blocks (Fairbourne Road and Dragmore), to the proposed new local centre on Kings Avenue will be a challenge because of roads have been closed due to building works.
Clapham Park: Poynders Road Local Centre and Kings Avenue	Full de-designation and designation of new Local Centre on Kings Avenue	The Streatham Society	The new Clapham Park local centre needs to be backed up with a strategy for safe pedestrian crossings of King's Avenue and design needs to preserve the green boulevard aspect of Kings Avenue despite higher pedestrian footfall.
Clapham Park: Poynders Road Local Centre and Kings Avenue	Full de-designation and designation of new Local Centre on Kings Avenue	Member of the public	Support as long as the range of businesses currently on Poynders Road are maintained - bakery, hardware store, fish and chips shop.
Clapham Park: Poynders Road Local Centre and Kings Avenue	Full de-designation and designation of new Local Centre on Kings Avenue	Member of the public	Not enough information is given about the actual effect of the proposed changes to Kings Avenue. More should be published.

Loughborough Junction Local centre	Extension	Loughborough Junction Neighbourhood Planning Forum	Broadly in favour with proposals, including the introduction of new uses to the arches along Rathgar Road. However concerned that new uses in Rathgar Road could lead to the development of nuisance night- time economy and it seeks reassurance that curbs could be placed on new uses to ensure this did not happen. Also concerned that existing businesses would be relocated in empty neighbouring arches at the same rent.
Loughborough Junction Local centre	Extension	Network Rail	Support the proposed extension as it will support the principles of the draft Loughborough Junction Action Plan. Specifically the inclusion of Rathgar Road will assist in providing additional and a unique space for additional town centre uses in a small cluster away from the main Coldharbour Lane centre. This will also support a new route through one of the arches to improve links from Loughborough Estate to the rail station.
Loughborough Junction Local centre	Extension	Member of the public	Supports the Loughborough Junction Forum response.
Loughborough Junction Local centre	Extension	Member of the public	Supports and recommends the railway arches at the junction of Coldharbour Lane and Herne Hill Road to the Padfield road side are included also to ensure that the frontage is continuous.
Loughborough Junction Local centre	Extension	Member of the public	Loughborough Junction looks sensible
Loughborough Junction Local centre	Extension	Member of the public	Supports Loughborough Junction – more shops are needed.
Loughborough Junction Local centre	Extension	Loughborough Junction Action Group	Broadly in favour of the boundary changes including the introduction of new uses to the arches along Rathgar Road in order to improve the range of shops, restaurants and cafes in the town centre and to improve connections between parts of the Loughborough Estate and Loughborough Junction station. Extension of the town centre to the frontages along Coldharbour Lane between Hinton Road and Herne Hill is supported but would like to see this extended to the railway arches on the northern section of Herne Hill Road to provide continuous town centre frontage round Coldharbour Lane to Padfield Road. One major concern is the frontage to LJ Works, the new affordable workspace project funded by the GLA and Lambeth. Understand it is a KIBA but would arguing its uses are likely to include many start up food and clothing/fashion businesses that benefit from a small amount of retail/café space taking up a small area at the front

			of the site. This would animate both Loughborough Road, increasing public awareness of the project and provide a commercial outlet for the businesses operating from LJ Works. Argues that this would not be large scale retail and would be ancillary to and providing for the needs of the KIBA. Concern that businesses could be displaced from Rathgar Road once it becomes part of the Loughborough Junction Town Centre. Want reassurance that existing businesses could remain or be relocated in empty neighbouring arches at the same rent.
Loughborough Junction Local centre	Extension	Indigo on behalf of St Clair Developments	Strongly object. The current Coldharbour Lane frontage is appropriate as it sees footfall from the nearby rail station, but Hinton Road is not able to suitably support retail as any shop would be isolated away from the main commercial route. The Hinton Road Frontage, whether used for residential access or business floorspace, can still be designed as an active and dynamic frontage without imposing undue restrictions.
Loughborough Junction Local centre	Extension	Member of the public	The Loughborough Junction town centre extensions are welcome, but public realm improvements will be needed to reduce litter, improve cleaning and reduce traffic flow if it is to be a truly effective town centre.
Loughborough Junction Local centre	Extension	Member of the public	Concerned that existing business in Rathgar road could be pushed out. There are quite a lot of take-aways on Coldharbour lane. Loughborough Junction is not short of places to get food. Concerned that changing the uses of arches in Rathgar road could impact on residents living next to these arches.
Loughborough Junction Local centre	Extension	Member of the public	The Loughborough Junction scheme isn't working, unless Loughborough Junction station has a new western entry point. If it doesn't people will still have to go on to Coldharbour Lane and under the railway bridge to get into the station from the current eastern entrance. Also against existing metal-bashing/car repair businesses being cleared out for restaurants and bars. Questioned how such developments would affect the restaurant next to the Maid of Switzerland.
Kennington Park Road/Kennington	Partial de-designation	Member of the public	No objection to the proposed change

Road Local Centre			
Kennington Park Road/Kennington Road Local Centre	Partial de-designation	Member of the public	The builder's merchant on Kennington Park Road is more retail than employment in nature. Suggest this remains in the town centre

9. Do you have any other comments?

18 respondents provided other comments related to town centres. The comments provided by these respondents can be summarised as the following:

- Capital Growth/Sustain think policies should support provision of independent shops or temporary market stalls to enable food hubs to thrive, supporting local food businesses. There should be space in town centres and close to estates for local projects to sell locally grown food to local people such as the Loughborough Farm and food planting can be integrated into town centre design such as The Orchard in Brixton's Business Improvement District.
- The number of fast food or fried chicken shops should be reduced throughout Lambeth and priority should be given to healthier alternatives to give residents more choice for their health. The limit of hot food take-aways to schools should be extended to other places where young people meet or opening hour restrictions could be applied at times children are most likely to be passing by. The amount of litter produced should also be reduced.
- Better controls should be established about the number of commuters parking in local streets.
 - The council should make a success of Vauxhall Town Centre by removing the bus station and adding a good mix of retail, restaurants and offices.
- Clapham Business Improvement District requested more consideration given to upgrading Clapham to a major town centre status. 20 million people use train stations in Clapham High Street and it has a NT2 classification within the London Plan, placing it alongside importance with Brixton and above Streatham. In order to protect and support Clapham's status as an important cultural destination, this should be reflected within the Local Plan.

The remaining comments are summarised in section 3.16.

Written responses

On behalf of UDN Properties Limited, CGMS outlined that the Draft London Plan seeks to protect and enhance the night time economy and encourages boroughs to develop a vision for the night time economy, supporting its growth and diversification. The respondent agreed with this approach and would welcome a similar Local Plan policy

Loughborough Junction Action Group and Loughborough Junction Neighbourhood Planning Forum argued the area has a high density of railway arches and that current employment is skewed towards the automotive business and artists' studios. They would like to protect current uses but encourage a greater diversity of uses in empty arches.

Statutory consultees

Wandsworth Council commented that they would be interested in any views Lambeth has on the new Town Centre hierarchy in the draft new London Plan and its impact on the shared Wandsworth and Lambeth centres. Wandsworth can share monitoring information as necessary and would welcome the opportunity for further discussion of the role and function of shared centres.

Network Rail set out that they own and manage a significant number of railway arches within Lambeth and has significantly invested in areas such as Brixton and Herne Hill. It is acknowledged that the railway arches, which form a spine running through the borough, provide a mixed contribution to the area. Network Rail argued that is evident that the railway viaduct can act as both a visual and physical barrier to permeability but the arches

within the viaduct provide employment space for a wide variety of tenants throughout Lambeth. For railway arches within industrial areas, it is considered that provision should be allowed for flexibility in the use, provided that the proposed use does not impact negatively on the industrial nature of the designated area. Network Rail argued that arches within industrial locations can provide complimentary alternative uses which can support the other businesses in the area and that the Local Plan should include support to allow for a mix of uses which are suitable and appropriate to the specific locations and should not be restrictive in terms of uses nor occupiers.

TfL Commercial Development set out that the Draft London Plan promotes high-density, mixed-use development at and around town centres, stations, other transport hubs and other well-connected locations. This should be reflected in town centre policies in order to encourage high density development. For example, Draft London Plan policy H1 (Increasing Housing Supply) requires boroughs to prepare deliver-focussed Development Plans in order to ensure that ten-year housing targets are met, including optimising the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing or planned (PTALs) 3-6 or which are located within 800m of a town centre boundary or tube/rail station.

Lambeth Learning Disabilities Forum Workshop - Tuesday 7th November 2017

The workshop was held at 'We are 336' and was attended by people from:

- Lambeth Mental Health and Learning Disabilities Service
- Lambeth College
- Orchard Hill College
- People First Lambeth
- The Opportunities Project
- Vosse Court
- Lambeth Learning Disability Assembly

The first part of the workshop focussed on town centres. Attendees were asked where they like to go and what they like to do in their town centres. They were also asked what improvements they would like to see.

Town centres

In Lambeth's town centres, attendees would like to see:

- More libraries and protection for existing libraries.
- More day centres, sports centres and youth and social clubs. People should not be staying at home on their own during the day.
- Leisure facilities with a café and better lockers in the changing areas.
- More churches and swimming pools.
- Places that the community can use, such as pubs during the daytime, cinemas and bowling alleys.
- More bins would help to reduce litter.
- Air quality needs to be improved. More parks would help.

Shops

- More shops in Lambeth would be welcome in areas such as Brixton and Stockwell. Stockwell does not have enough shops and also needs a post office and cinema. There are currently not enough shops Vauxhall.
- Local shops such as barbers, hairdressers, doctors, dentists, cafes and banks are important. If things are in walking distance there is no need to take public transport.
- Banks and post offices are important to pay rent. More of them would be welcome.
- There seems to be a lot of estate agents in the borough, especially in West Norwood.
- There are also a lot of betting and money shops in Lambeth and other shops, such as clothes shops, would be better. Money shops target vulnerable people.
- Shops that sell cheaper items such as Poundland and CEX should be supported.
- Waterloo has a good number of shops.
- There are lots of places to eat and shop in Streatham. The leisure centre and cinema are also good. However the area needs a park.
- An Apple store in Brixton or Stockwell would be great for the area.
- Kennington is small and needs more shops.

Restaurants

- Local restaurants should be protected.
- Clapham needs more supermarkets and food shops, particularly a Lidl.
- Some attendees felt that there are enough takeaways in Lambeth whilst others would support more Burger Kings and KFCs.

The second part of the workshop focussed on transport. Attendees were asked where they travel to and how they get there. They were asked what improvements to public transport they would like to see.

Public transport

- Public transport should have more CCTV to make people feel safer.
- There is a good bus network to Streatham but more buses to Brixton is important.
- Minibuses are important for some people to travel around and some families need cars.
- Bus drivers can be unhelpful and unfriendly to some users.
- People shouldn't be able to eat on the bus to stop littering.
- Buses need more steps to help people get on.
- Trains in Lambeth are good because they are frequent and have helpful staff. More trains would be better.
- Some stations and their facilities need to be more accessible, such as changing rooms and toilets. Having more staff in stations would also help people with the machines.
- A tube in West Norwood and Streatham would be helpful.
- Some areas need more parking, like West Norwood.
- More taxi services are needed as current services often don't come on time.

Walking and cycling

- Lambeth's main roads are not good for walking and cycling because there is too much traffic. Attendees feel it is too dangerous but would consider cycling if there were more cycle paths as they are safer.
- Cycle lanes should be maintained to a high standard to keep them safe. Some of them need re-painting.
- More dropped curbs would help people to cross the road more easily.
- Pavements should be maintained to ensure there are no loose paving stones and leaves should be cleared quickly as they are slippery.
- Some crossings do not say how much time there is to cross and some attendees need more time to cross the road.
- Stockwell needs more benches.
- There is too much traffic in Streatham.

The final part of the workshop looked at whether there was anything else the Local Plan should be looking at:

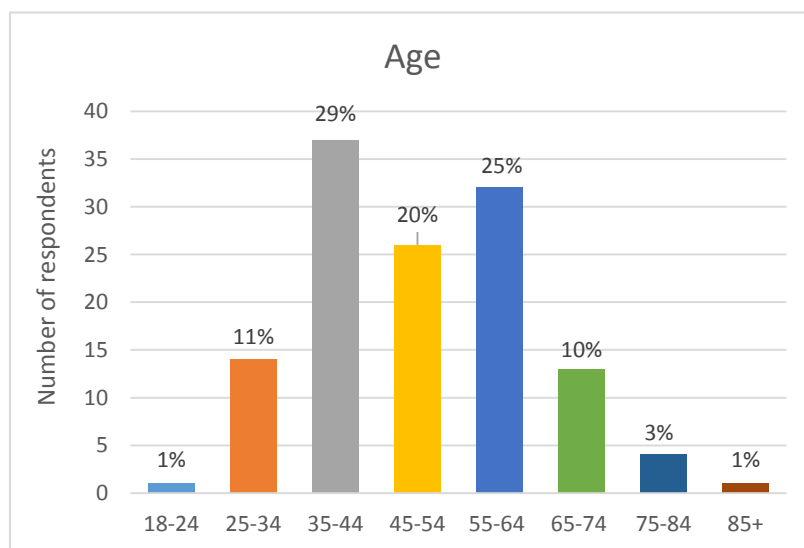
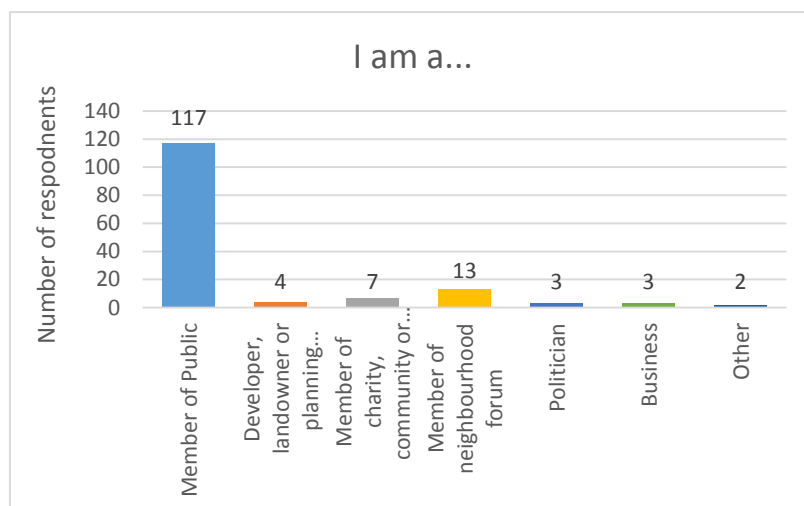
- The miniature railway should be re-opened in Brockwell Park.
- More housing is needed for people who are disabled and for older people.
- Older people need access to hospitals.
- More jobs and work placements are needed.
- Noise levels in Lambeth need to be reduced.
- Police stations need to be kept open and more community police officers are needed to make Lambeth feel safer.
- Changing facilities need to be publically accessible.
- Lambeth needs more football pitches.
- Easy-read versions of the Local Plan would help more people to participate.

3.10. Hotels and visitor accommodation

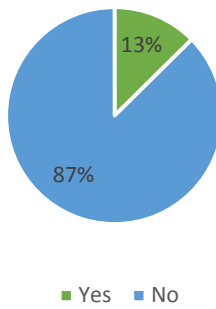
In response to the 'Hotels and Visitor Accommodation' survey, 131 responses were received. A total of 5 written responses, including statutory consultees, was received.

Survey responses

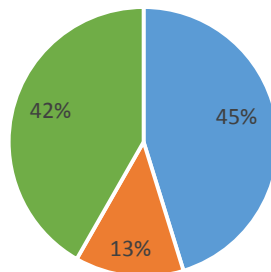
- The majority of respondents for the Hotels and Visitor Accommodation survey identified themselves as members of the public. Four respondents identified as being a developer, landowner or planning consultant, seven were members of a charity, community or faith group, 13 identified as being a member of a neighbourhood forum and three identified as being a politician. Three respondents identified as being a business and two identified as 'other' – one local resident and one interested party. It should be noted that some respondents identified themselves as belonging to more than one category.
- 128 survey respondents provided details of their age. The majority of respondents identified as being aged 35 or over, with 29% identifying as being 35-44, and 25% identifying as 55-64.
- 119 survey respondents provided an answer to whether they or anyone they lived with had a disability, with the majority of respondents answering no to the question.
- Of the 115 respondents who provided gender information, 45% identified as being a man and 42% identified as being a woman.



Do you or anyone living with you have a disability?

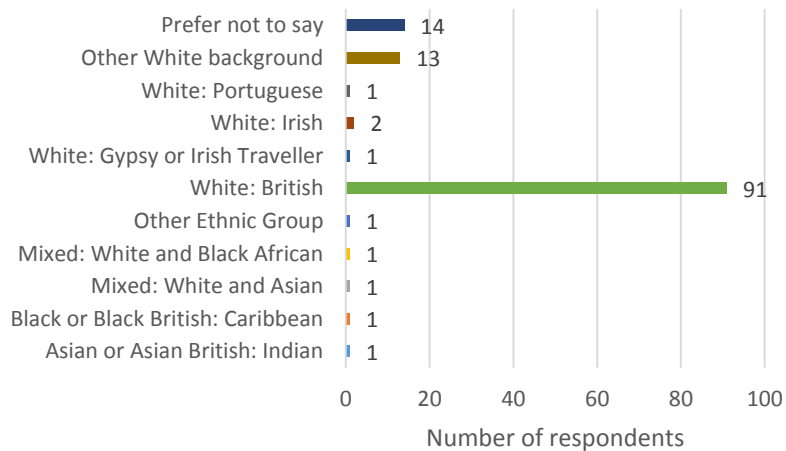


Gender



■ Man (including trans man) ■ Woman (including trans woman)
■ Prefer not to say

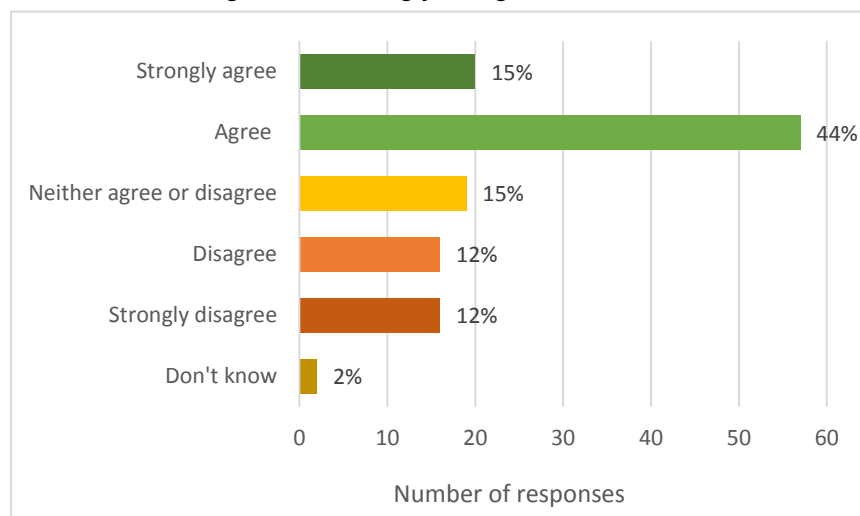
Ethnicity



1. Short-term lets, like Airbnb and student halls, are a good way to meet demand for visitor accommodation in Lambeth alongside hotels. To what extent do you agree or disagree with this statement?

Survey responses

59% of the 130 respondents who answered the question either agreed or strongly agreed that short-term lets are a good way to meet the demand for visitor accommodation in Lambeth, alongside hotels. 15% neither agreed nor disagreed and 24% disagreed or strongly disagreed.



Of the respondents who strongly agreed or agreed, two respondents highlighted that Lambeth should have variety of accommodation and four people stated that these options offer people flexibility. Other respondents provided the following reasons:

- These options can rapidly respond to changing demand.
- They provide an alternative to room-only accommodation (with common rooms, use of a kitchen for example).
- They are a better use of space and could provide universities with additional income.
- They provide affordable options, particularly for families.
- They are a good short term measure.
- They minimise disruption to residents.

Some respondents supported the approach so long as they pay tourist taxes like hotels, do not impact on housing supply and are managed. Others felt that a concentration on temporary visitors in residential areas should be avoided in the same way that an overconcentration of licenced premises need to be avoided to prevent harming local amenity and becoming dominant. One respondent felt that student halls would need to be managed responsibly by staff at night to mitigate negative behaviours from guests, impacting on local residents.

Two respondents stated that there is enough existing hotel accommodation with one highlighting the Waterloo area as a prime example of this. Another respondent commented that there has been a huge increase in hotel accommodation in Clapham Common and the residential nature of the area is being changed by the damaging expansion in hotel accommodation.

Some respondents supported Airbnb as it helps local businesses and individuals because spending goes back into the local economy. However, other respondents felt that Airbnb reduces the amount of properties available for rent for local residents and that it can drive up property prices artificially. One respondent suggested that this is what has happened in Barcelona.

Of the respondents who either disagreed or strongly disagreed, six respondents felt that short-term lets decrease the amount of accommodation available, particularly family accommodation. Five respondents felt that short-term lets have a negative impact on the availability of affordable units.

Other respondents raised the following issues:

- There is a housing shortage and it would prioritise visitors to London over those who live or work in Lambeth.
- It leads to homes intended for residential use being used as hotel rooms.

Four responses stated that Airbnb have a negative impact the community, whilst two others noted that they attract a transient population which do not contribute to the borough, diminish the residential character of an area and change local services. Two respondents were concerned about anti-social behaviour associated with these properties. Security concerns were also raised with the 'coming and goings of strangers' and the impact of noise.

One respondent felt that short-term lets are difficult to regulate whilst another felt that the council has not done enough to enforce the 90 day rent limit for short-term lets, particularly in the Bishop's ward. The respondent suggested that the Local Plan should be amended to prohibit short-term lets unless they are purpose built and replace any lost residential properties either on site or off-site.

Respondents also raised the following issues with short-term lets:

- Buying flats to just let them out at night shouldn't be allowed.
- Private landlords may start setting their prices at a nightly rate.
- Former social housing properties on housing estates have benefited significant discounts in their prices under Right to Buy schemes only to become accommodation for tourists which then pay no business rates.
- Many short-term lets are illegal so the overall quantum is under-estimated.

Five respondents supported the use of student halls during the holiday periods on the condition that they don't unbalance the local community. Two respondents disagreed with the use of student halls, arguing:

- Better consideration needs to be made of the density of student accommodation and the impact it has on local communities.
- The needs of younger student populations are often very different to the needs of local communities.
- The council must take steps to ensure that developers cannot dodge tax commitments by changing the use class or removing the restriction placed on sales.
- Student accommodation should not be built as an alternative way to create private residential or short-term let accommodation. The Local Plan needs to ensure that these halls cannot be converted into short-term lets and remain as accommodation for educational establishments.

Respondents raised concerns about the number of hotels in the Southbank and Waterloo area and concerns about the increased traffic and air pollution from delivery vehicles. One of these argued that there is no local tax on hotels and so there is no financial benefit to the area.

Of the respondents who neither agreed nor disagreed, one respondent felt that these are two entirely different things. Two respondents supported the use of student halls. However, some respondents only supported Airbnb if it involved the letting of a spare room rather than whole units which take residential units off the market. Respondents also argued that Airbnb are not conducive to good neighbours and there are antisocial behaviour concerns. One respondent noted that Airbnb can be good but needs to be monitored to ensure that it is not being used to exploit vulnerable people who may not be able to access the private rented market.

Written responses

The Brixton Society argued that short-term lets should not be encouraged.

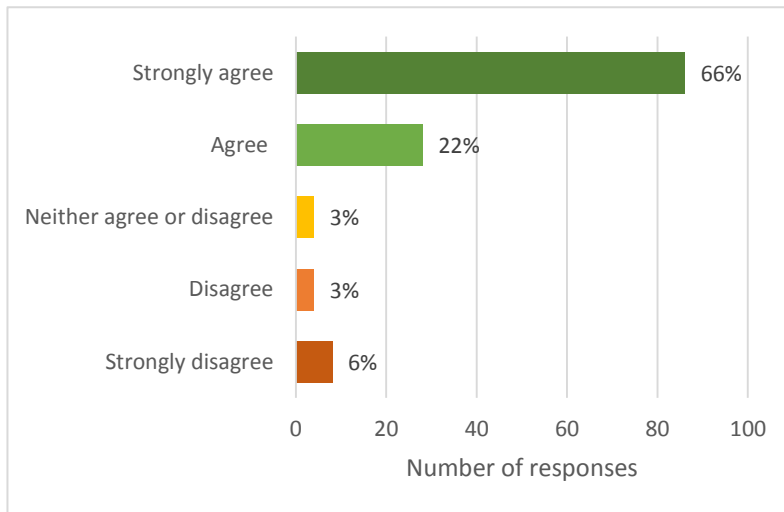
Statutory consultees

Wandsworth Council outlined that they did not agree with using residential property arguing that the growing gap between demand and supply does not justify losing permanent housing. They noted that further work on the impact of average rents would be useful. However they did agree that student halls could be used out of term time.

2. If evidence shows that Lambeth has enough visitor accommodation to meet predicted future demand, Lambeth Local Plan policy should prioritise other uses, such as housing and workspace, over new hotels. To what extent do you agree or disagree with this statement?

Survey responses

Of the 130 respondents who provided a response to the question, the majority agreed with prioritising other uses over new hotels. Two thirds of the respondents strongly agreed and another 22% agreed. Only 9% of respondents disagreed or strongly disagreed and the remaining 3% neither agreed nor disagreed.



Of the respondents who agreed or strongly agreed, nine respondents emphasised the importance of housing and affordable housing for the following reasons:

- Housing needs to be protected as there is a housing crisis.
- The shortage of housing is acute and more affordable housing for existing residents should be a priority as Lambeth has high social needs.
- Young people simply cannot afford to rent or buy if they work in essential or low paid occupations.
- The shortage of housing in Clapham Common ward has been made worse by the hotel group buying up houses and flats when they appear on the market.
- Lambeth need to retain a sense of neighbourhood.

Eight respondents stated that housing and workspace should always be prioritised over visitor accommodation to keep Londoners in London as it is hard to find an affordable property to buy or rent.

Respondents were concerned about the number of hotels in the borough, arguing that hotels are seen to be the priority at the moment but there are already too many hotels in Lambeth. Some respondents argued that Lambeth is not a tourist area and should not have to provide more hotel beds just because other boroughs, which are more suited to tourists, have failed to provide what London needs. It was also felt that hotels destroy the local character of an area, harm residential amenity, take the place of community facilities such as schools and leisure centres and visitors do not use local facilities or shops.

Nine respondents outlined the negative impact hotels are having on Waterloo and North Lambeth:

- Significantly impacted on the community in Waterloo where there are more visitors than residents, with a danger that Waterloo becomes a dormitory for visitors.
- Huge bias towards building hotels in the north of Lambeth at the cost of a diverse environment.
- The areas don't benefit economically as visitors spend their money elsewhere.
- Hotels don't provide any kind of frontage and reduce the vitality and environment of formerly active areas.
- The provision of restaurants, licensed venues and tourist venues has been at the detriment of the local community.
- Action is needed for Lower Marsh to maintain independent shops and shops that provide services to the local community.
- Affordable housing is needed to support local shops and services and maintain the community, whose population is slowly recovering after years of falling.
- Waterloo needs permanent housing.
- If the demand is met and alternatives to Waterloo are available with good transport connections to Central London, it will leave more space for homes.

Respondents suggested that Lambeth should work towards developing economic activity instead of being a sleeping suburb for Central London. It was also suggested that workspaces are needed in Waterloo instead of hotels because they support the local economy through the spending of their workers, particularly in Lower Marsh.

However, one respondent did note that the increase in the number of hotels in Waterloo has had positive impacts on the local area by increasing regeneration. Respondents outlined a number of policy suggestions:

- When redeveloping a site where a hotel exists the number of hotel rooms must not significantly expand on the existing quantum.
- Restrictions must be placed on hotel development in close proximity to existing residential properties.
- A density test should be introduced in order to assess the number of hotels in an area.
- Rather than relying on total number of hotel rooms, an assessment should be made of the quality of provision, the number of jobs created and the impact of the development on the local area.
- Hotels should be required to recruit a minimum proportion of staff from the borough as many hotels are large international chains which do not employ local people.
- Hotels should be required to contribute to the maintenance of the wider public realm and to offset the increase in certain establishments in the area.
- A social impact study of turning areas into tourist destinations should be undertaken as Lambeth could end up with few permanent local residents like Venice.

Respondents who disagreed or strongly disagreed with prioritising other uses over hotels said that hotels appear to be full and demand is growing and should be treated in the same way as all businesses as they provide both revenue and employment. Given the position of the borough, Lambeth should be attracting more tourists and it was noted that hotels are clustered in the north of the borough whilst the south has almost none and can be generally low budget.

Guys and St Thomas' Charity supported visitor accommodation within the Central Activity Zone, town centres and in areas in close proximity to transport nodes and considered that these areas should support a mix of uses, including hotels. Another response advocated focusing on new hotels with appropriate resources such as car parking and suggested that the council should avoid supporting the expansion of existing hotels where there is residents' parking as this causes congestion and denies local residents the ability to use spaces they have paid for.

Q+A Planning Ltd strongly disagreed and outlined the following points:

- This approach would be wholly contrary to national planning policy and would introduce an artificial barrier to the delivery of economic growth in the borough.
- Demand is not necessarily equivalent to need, and in any event, focusing solely on quantitative demand means that qualitative matters, such as distribution of facilities and consumer choice, can be missed.

- Whilst the indicative need figures from the GLA are helpful and the council's monitoring of delivery against those figures assists, the evidence should not be interpreted that once the indicative needs are met, then other land uses should be prioritised - this ignores qualitative considerations both internally with Lambeth and in the wider Greater London area.
- Need has not been a national planning policy test in development management for a number of years because of its recognised failing that it presented a barrier to the entry of local markets from new operators, thus restricting competition.
- Policy should be drafted in a flexible manner that balances competing land uses, with necessary allocations included in the development plan to meet needs in full.
- Including a policy with a rigid 'in principle' hierarchy of land use would not be consistent with national policy, would not be effective, would restrict competition and therefore would not be sound.

Two of the respondents who did not agree or disagree considered that the approach did not go far enough as it states that Lambeth should only change its policy if there is 'enough visitor accommodation' and Lambeth desperately needs social housing rather than visitor accommodation. Another respondent argued it depends on whether the council starts taking a sensible approach to Airbnb.

Written responses

DP9, on behalf of CLS Holdings Ltd, stated that hotel delivery should be in line with demand and the London Plan evidence base should inform new local targets for hotel floorspace and should increase as a result. They argued that the suggestion that Lambeth has sufficient visitor accommodation to meet future demand does not follow the GLA data projections and so did not support this.

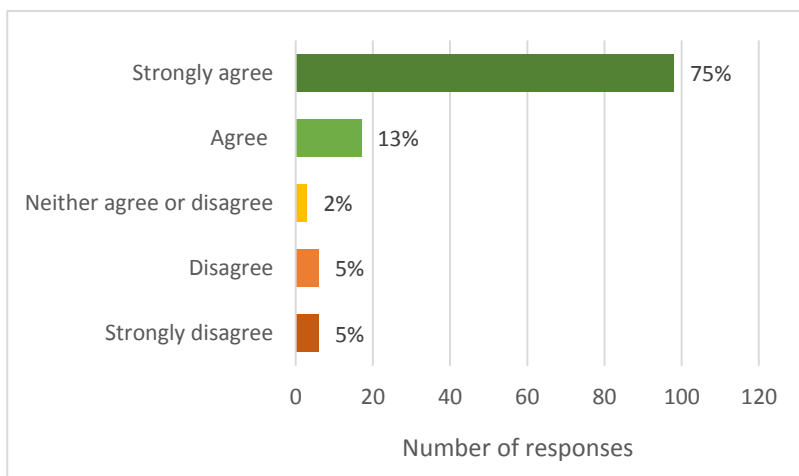
Statutory consultees

Wandsworth Council agreed but stated that on-going changes in demand for retail floor space may free up land for hotels in town and local centres.

3. An over-concentration of hotels close to where people live can harm the amenity of residents, for example through the creation of noise, traffic and disturbance. Planning applications for new hotels should be required to assess their impact on residential amenity, including the cumulative impact of each new hotel.
To what extent do you agree or disagree with this statement?

Survey responses

130 respondents answered this question and the majority of respondents either agreed or strongly agreed (88%). 10% disagreed or strongly disagreed that planning applications for new hotels should be required to assess their impact on residential amenity, including the cumulative impact of each new hotel. The remaining 2% neither agreed nor disagreed.



Of the respondents who strongly agreed and agreed, one respondent suggested that the proposal should also take into account the cumulative impact of any local concentration of hotels and not just the one hotel under consideration. Other respondents stated that an over-concentration of hotels close to residents impact on local residential amenity through the creation of noise, traffic and pollution. Others highlighted the impact on parking, issues with taxis and delivery times as hotels are often 24 hour operations.

One respondent gave an example of a hotel which constantly wants to increase the number of rooms and argued that hotels do not care about their neighbours in the same way that people do. Others highlighted the need for neighbours not visitors and the need for larger housing in place of hotels.

Six respondents commented on the impact of hotels and their transient populations on the surrounding area. The impacts included:

- Lack of incentive to reduce anti-social behaviour.
- Not adding anything to local neighbourhoods and overcrowding existing services.
- Not creating long term communities, with an interest in the welfare, well-being and growth of an area.
- Hotels are located on main streets and the frontages lack any other use so the effect is to kill the vitality and environment of formerly active areas.
- Encouraging other businesses that are more suited to tourists and students than residents.
- High rise buildings at Vauxhall Cross have cast a huge sun shadow over local areas, created wind tunnels, created areas that are devoid of people and is going to remove the best transport hub and bus station the area has had.
- Closure of local businesses to make way for budget hotels.

Other respondents questioned whether hotels could engage further with the local community by giving a reduced or free meeting rooms or by introducing a quota of employees that must be hired who live in the borough. Other suggestions included:

- The council should select an independent external adviser to provide an assessment of the cumulative impact of the hotel as too many hotel developments seen in Bishop's Ward have manipulated the evidence around their submissions and there has been a lack of in depth scrutiny on matters such as servicing and delivery.
- Alcohol licences should be very carefully considered.
- There should be safe separate cycle lanes and safe pedestrian facilities instead of roads designed for motor vehicles.

Waterloo

Respondents who strongly agreed or agreed that planning applications for new hotels should be required to assess their impact on residential amenity made specific comments in relation to Waterloo:

- Waterloo is a dormitory for tourists and no more luxury hotels or flats are need. Planning policy should include a presumption against further visitor accommodation in Waterloo.
- Workspaces are need because they support the local economy through spending of their workers, whereas tourists spend money elsewhere.
- The loss of amenity in Waterloo is mostly a loss of economic activity and the loss of service and retail for residents.
- The over-concentration of hotels is diluting the sense of community and diversity.
- Lower Marsh is suffering from rents which have been forced up and the interesting and useful shops are closing because hotels are being built instead of social housing.
- Construction noise in the area has become unpleasant.

Clapham

Four respondents who strongly agreed made the following comments regarding the Clapham Common ward:

- The ward suffers from badly run hotels that are too large for their site.
- Hotels in the area do not show regard for local people.
- Unwanted and undesirable activities are occurring outside hotels on Clapham Common Southside because they are targeted at the value-end offering.

One of these respondents focussed on the Euro Hotels Group and argued that the Group have increased the amount of accommodation it provides, detrimentally impacting on what is supposed to be a residential area. They argued that there is been an increase in the amount of noise and the number of commercial vehicles with the most affected roads being Cautley, Lessary and Lynette Avenues. Green spaces at the back of the hotels have been used to increase the amount of accommodation and garden space and trees have been cut down to provide picnic tables and chairs.

Respondents who disagreed or strongly disagreed stated that hotels can enhance residential by providing gyms, shops, bars and restaurants and if properly managed hotels do not need to disturb local residents. Other respondents suggested that there are laws governing noise levels that all developments and businesses can create and that discrimination against hotels is inappropriate and there shouldn't be too many restrictions as they may be developed elsewhere.

Q+A Planning Ltd commented that amenity will be protected through policy. The developer did not disagree with the requirement to assess the impact on residential amenity from a planning application for a hotel, much like the same would be expected for any other land use. However they claimed that any approach that insists on considering the cumulative impact of each new hotel has numerous practical challenges and argued that it would be impossible for a planning application for one hotel to mitigate the impact of another hotel, particularly if the existing hotel was causing a much greater impact on amenity. They stated that any consideration of the impact on residential amenity therefore ought to be focused only on an application proposal.

Guys and St Thomas' Charity strongly disagreed and claimed that schemes should be considered on a case by case basis as there are examples of hotel uses operating in harmony with alternative uses. Guys and St Thomas' Charity outlined that restricting the inclusion of hotel uses alongside residential risks inhibiting development, which may result in wider implications for the borough.

Of the respondents of neither agreed nor disagreed, one respondent doubted hotels cause nuisance but may impact on public transport in areas already congested whereas another felt that hotels are noisy.

Written responses

On behalf of CLS Holdings, DP9 stated that there are areas where hotels will be concentrated closer to tourist destinations where residential accommodation is less appropriate. They considered hotel and residential accommodation to be broadly compatible uses and instructed Lambeth to take account of hotel need in the rest of the borough, outside of Waterloo, particularly in the Opportunity Areas.

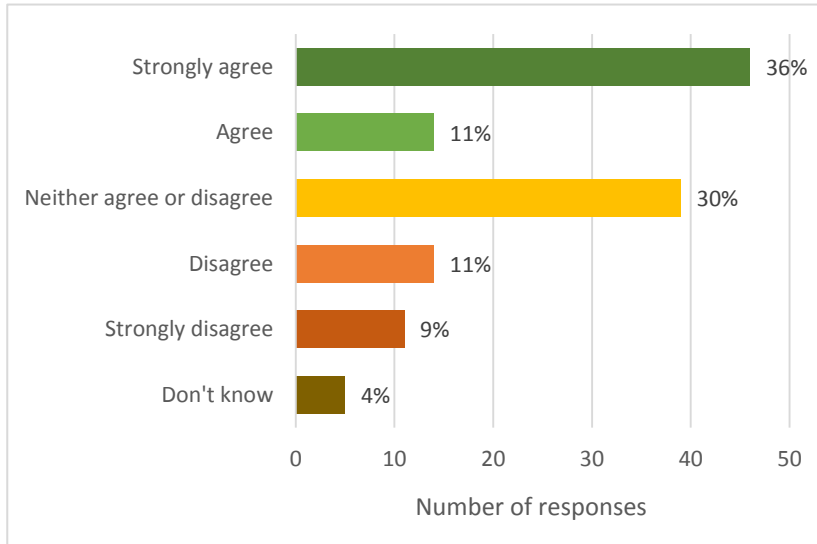
Statutory consultees

Wandsworth Council stated that they had no issues to raise and noted that Impact Assessments are already required and it may be that a review of the threshold is all that is required. Major schemes that would impact on Wandsworth are required by the NPPF and London Plan to produce an impact assessment, including traffic impact.

4. New hotels should not be supported in Waterloo because there are enough hotels in that part of Lambeth.
To what extent do you agree or disagree with this statement?

Survey responses

129 respondents answered this question, with 36% strongly agreeing that new hotels should not be supported in Waterloo because there are enough hotels in that part of Lambeth. 30% neither agreed nor disagreed. 11% of respondents agreed and 20% either disagreed or strongly disagreed. 4% respondents did not know.



Of the respondents who agreed or strongly agreed 10 respondents felt that there were enough or too many hotels in Waterloo already. The issues raised by respondents included:

- Noise from guests, coaches and delivery vehicles.
- Levels of traffic in the area.
- Creation of a dormitory for tourists.
- Lack of benefit to local economy as tourists spend elsewhere in London.
- International chains employ people from outside local area.
- Hotels dominate to the detriment of other uses such as offices, workspaces, independent retail, charities, art venues and housing.
- Waterloo prime real estate should be focused towards office developments due to the complete lack of quality office provision in such a central area.
- There are too many big chains and cafes instead of services for local residents.

Three respondents highlighted that Lower Marsh has been negatively impacted on by hotels, claiming that Lower Marsh is losing its individuality and all the independently owned shops are closing down in favour of more hotels and retail chains. One respondent argued that residents don't need or want a high street that looks like all of the others.

Eight respondents argued that hotels damage the local community and the overabundance of visitors is threatening local residential life and Waterloo is losing its residential identity. The respondents argued that people staying on a short term basis do not contribute to the local community and that permanent residents are needed to keep the community alive.

One respondent argued there is too much focus on tourism and not enough on hard working residents. Other respondents offered suggestions for limiting the number of hotels in an area. These suggestions included:

- Concentrate visitors where they want to be so that anti-social behaviour by the minority can be contained.
- Testing hotels regarding density and proximity to residential properties, with greater consideration of the cumulative impact of developments.

- Hotels should be spread out away from Waterloo. Streatham was suggested in order to benefit the local economy and to provide a better range of accommodation for visitors who can't afford the high costs of central London hotels.
- Use sites for housing instead of hotels and focus on living standards.

Respondents who disagreed or strongly disagreed stated that if there were truly enough hotels, then no-one would want to build them anymore. One respondent suggested that hotels should be allowed in this central location and then the council use the planning obligations to benefit the poor. Another response felt that demand is greatest in the central business districts especially nearest the transport hubs.

Other respondents were positive about the provision of hotels in Waterloo and argued:

- Waterloo is the right place for new hotels given its great transport links and proximity to Central London.
- Waterloo is the heart of the main attractions, used for travel and tourism and is not a very residential area.
- Waterloo puts Lambeth on the international map.
- Hotels in Waterloo support the local economy and are a more viable alternative to areas north of the Thames.

One of these respondents claimed that using brownfield sites for hotels is acceptable as long as hotels provide some percentage of affordable accommodation for low paid workers at the hospitals such as Guys & St Thomas'.

Guys and St Thomas' Charity suggested that schemes should be considered on a case by case basis and there are many examples of multiple hotel uses operating in a neighbourly manner within close proximity to other sensitive uses such as residential. The Charity argued that hotel provision reflects market demand and therefore to restrict such schemes may result in inhibiting development and wider negative implications for the borough. The response noted the London Plan and the Waterloo OAPF supports hotels in this location.

Q+A Planning Ltd strongly disagreed and felt that introducing some form of blanket ban on hotels in the Waterloo area would introduce an inappropriate barrier to the market and would constrain economic growth. Their response argued that a large number of hotels is not a reason to resist further hotels, particularly if it introduces choice to the market and creates economic growth. It is inevitable in areas of tourist activity there will be demand for hotel accommodation and any proposals for additional hotels should be judged on their own merits, taking into account the specific policy requirements of the site.

Respondents who neither agreed nor disagreed suggested that hotels could be spread out so there is less concentration around Waterloo. Another respondent suggested that whether or not there is enough hotels is not the point and that people in Lambeth need housing not hotels. Other respondents said they did not know enough about the Waterloo area to comment.

Written responses

DP9, on behalf of CLS Holdings Ltd, argued that new hotels in Waterloo should not be restricted where there is demand for new accommodation.

Statutory consultees

Wandsworth Council stated that they had no issues to raise.

5. Lambeth is experiencing an increase in planning applications for 'serviced apartments'. These are like very small studio flats with their own kitchen and bathroom and there are concerns they will be used as permanent housing rather than by visitors. We are considering the need for a separate policy to manage this type of application. What are your views on this issue?

Survey responses

100 respondents answered this question. 27 respondents agreed that a separate policy is needed, with four of these claiming there is a need to ensure minimum exploitation of this kind of accommodation.

Use as permanent accommodation

15 respondents raised concerns that these units may be used as permanent housing or by landlords for short-term lets for families and individuals. Respondents suggested that they could be a way of avoiding HMO obligations to maximise revenue and there could be potential enforcement issues. Respondents highlighted a number of potential issues that could occur if serviced accommodation was to be used as permanent homes, mostly related to cost, space and quality:

- Four respondents claimed that they would be too small and two argued that they should not be used for permanent housing if they do not meet space standards.
- Four respondents argued that they would be very expensive permanent accommodation and it would be necessary to ensure that vulnerable renters are not exploited.
- Five respondents stated that serviced apartments would be a poor quality homes, with one suggested it would lead to bedsit type accommodation.

Five respondents felt that a separate policy with strict rules is necessary to prevent serviced apartments from being used as permanent residences. Another respondent argued there is a need to ensure that serviced apartments do not displace residential development. However, one respondent suggested that permanent use by residents may be unlikely if the structure is large enough, highlighting Staycity in Deptford Bridge.

General housing need

Nine respondents stated that Lambeth should prioritise permanent housing, with five of these arguing that affordable housing should be prioritised over all other types of accommodation. Another respondent argued the council should favour providing housing for people who live in London through self-build, housing associations and community based groups rather than commercial developers.

Other respondents argued that the council should stop accepting money from developers in place of affordable housing. A respondent gave an example of a site that was meant to be for affordable housing but has been sold to another developer who is applying to build a 270 bedroom hotel.

Impacts of serviced apartments

One respondent claimed that serviced apartments are merely longer-term hotels. Seven respondents highlighted the impact that this type of use would have on their community. These included:

- People who use them are not part of the community and it will result in a transient population.
- Permanent housing means people take an interest in their surroundings.
- There may come a time where there is no local community in some areas of Lambeth, just a tourist hub.
- Lambeth needs a balanced range of uses.
- Negative impacts on residential amenity and quality of life.

Other respondents argued that there is a risk that serviced accommodation may increase private rents or property prices. One respondent suggested that London's housing crisis means that people will rent anything at a premium whilst another suggested that the money from them will not enter into the local economy in a meaningful way.

Waterloo

Some respondents made reference to specific issues in Waterloo. One respondent argued that serviced apartments that were previously flats or houses in residential uses can reduce the community of permanent residents. The respondent felt the situation is different to the rest of the borough and any policy needs a presumption against serviced apartments in Waterloo. Another respondent questioned how serviced apartments would cater for families and claimed that Waterloo will turn into a 'ghost town'.

10 respondents highlighted the potential benefits of having serviced apartments in Lambeth. Four respondents were unconcerned about serviced apartments. The issues raised by these respondents included:

- Serviced apartments provide good options of accommodation for residents who come for 6-12 months (to work or study) and may otherwise be renting a single flat.
- Serviced apartments a good alternatives to hotels for tourists and business workers.
- Serviced apartments could provide medium term housing for either young people at an early stage in their career path or older people needing more manageable accommodation but not yet in need of full time care.
- Serviced apartments are useful for people attending meetings or conferences in central London, with one respondent suggested they should be cheaper than a hotel but too expensive to live in as a permanent home.
- They could adapt to permanent accommodation if visitor demand changes and would be able to support the affordable housing shortage in Lambeth.
- A small quantity of serviced apartments is not a problem.
- Serviced apartments are better than a reliance on hotels which cause residential issues.

Respondents outlined a number of suggestions for potential policies:

- Serviced apartments should be supported through planning policy if developers can demonstrate they are commercially viable and there is demand for them
- Serviced apartments should be strictly reserved for those needing to be in the capital for a short time, for example to be near a hospital.
- Serviced apartments should be restricted to a maximum length of occupancy.
- Policy should include a density test and test proximity to existing residential properties test.
- Policy should ensure that developments converting or building on existing office space must provide replacement office space (including at affordable rates).
- There should be greater independent assessment of the cumulative impact of serviced apartments with an independent assessor paid for by the developer but commissioned by the council.

Three respondents suggested that applications for serviced apartments should only be permitted in very limited circumstances. Two respondents argued that applications for hotels and luxury housing should not be permitted. Some respondents suggested that more evidence is needed to understand what the problems are and an analysis of the impact on the community would be useful.

One respondent, Q+A Planning argued that there is a difference between serviced apartments and apart-hotels.

- Serviced apartments are typically very similar in layout to upscale residential apartments.
- The majority of demand is for studio and one bedroom units from corporate clients with demand for two and three bedroom units from the leisure market.
- Serviced apartments typically attract guests staying for longer periods of time by accommodating both the leisure and business markets.
- Facilities outside the apartment are limited but may include a small fitness facility, bar and restaurant and a reception in the larger buildings.
- Often there are no facilities outside the apartment itself, with a reception located off site for room key pick-up.
- Apart-hotels differ by having a greater number of services that are normally associated with a hotel, such as a 24-hour reception and breakfast catering.

- Rooms may also be smaller in comparison but there is some crossover of concepts with some serviced apartment operators starting to offer a greater number of services.

Written responses

The Brixton Society stated the serviced apartments should be resisted because they too easily become long-term accommodation at inferior standards and further clarity is needed urgently. They labelled the “London Hotel” as a poor example of the serviced apartment model, despite originally being promoted as a hotel.

DP9, on behalf of CLS Holdings Ltd, stated that serviced apartments serve a specific need and should not be restricted. They commented that this type of accommodation is for short term lets, a form of visitor accommodation rather than a permanent residence, and so should be assessed under the visitor accommodation policy.

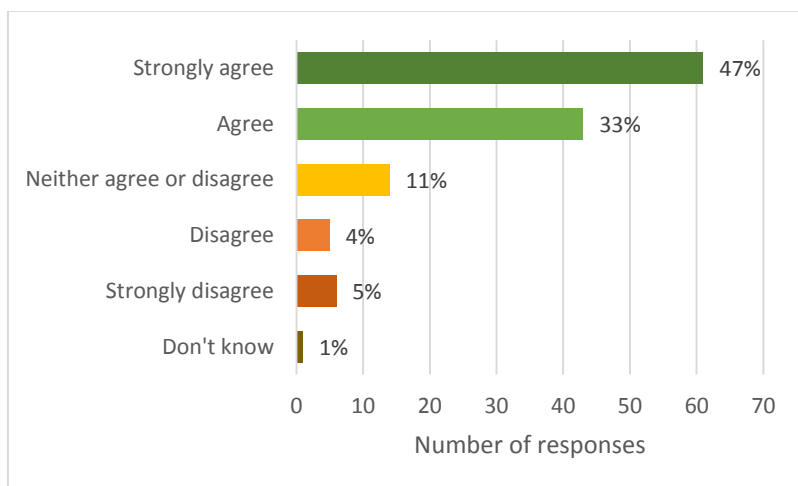
Statutory consultees

Wandsworth Council agreed that a separate policy may needed and argued that serviced apartments can be conditioned. They stated that Wandsworth has both a policy and uses conditions and s106 agreements.

6. Large new hotels should provide high quality employment, training and career opportunities for Lambeth residents. To what extent do you agree or disagree with this statement?

Survey responses

Almost half (47%) of the 130 respondents who answered this question strongly agreed that large new hotels should provide high quality employment, training and career opportunities for Lambeth residents. A third of respondents agreed. 9% disagreed or strongly disagreed and 11% neither agreed nor disagreed.



Of the respondents who either agreed or strongly agreed, some respondents felt that this could mitigate impacts on local communities and provide recruitment opportunities. Others suggested it is important to employ local people and for local people to share in the wealth created. Respondents suggested that:

- A certain percentage of jobs and supplier contracts should be agreed to be given to local residents and businesses at the planning stage.
- This is asked of all businesses and attractions.
- A full assessment of the employment arrangements in hotels should be taken and training, living wages, pensions and employment contracts should be made a condition of the planning consent.

Some respondents agreed or strongly agreed on the condition that any policy was well considered, including the impact on local residents through new or extended hotels. Guys and St Thomas' Charity agreed that new hotel development should provide training and employment opportunities but did not consider that these should be restricted to Lambeth residents only.

Some respondents were concerned about what the council considered to be 'local', with two respondents stating that in the hotel trade, staff are commonly recruited from afar, and accommodated on site or in hostels and so local people are not employed by these uses. One respondent argued that the term 'local' should mean the immediate locality, for example the relevant ward and surrounding wards, residents of that locality, and businesses in that locality.

Respondents raised concerns about the number of Waterloo hotel employees who are recruited from Lambeth being low and argued that current measures to promote career opportunities in hotel developments in Lambeth do not go far enough in requiring developers to recruit locally. One respondent questioned whether there were suitable candidates in the Waterloo to meet the expected demand whilst another questioned the position after Brexit.

Although respondents supported the approach, three respondents felt that any policy would be difficult to enforce. One respondent raised the concern that planning applications promise many benefits including the number of local employees they will hire and increased monies that will enter the local economy but these are often unenforceable and there is no evidence of any of the promises having been met from hotel developments in the last 15 years. However another respondent suggested there should be a percentage based system, backed up by mandatory legally binding declarations and checks.

Wages were another concern highlighted by respondents; one commented that wages are so low that they may not cover the accommodation or transport costs of local workers. A different respondent stated that hotel and catering trades have traditionally paid relatively poorly for junior staff. One response suggested that 'high quality employment' needs to include a commitment to pay the living wage and to provide proper employment contracts rather than zero-hours contracts, whilst another suggested that this is an opportunity to encourage improved hospitality standards.

Two respondents who disagreed or strongly disagreed stated that hotels don't provide enough employment for local people which is bad for the local community. Another response felt that unless Lambeth Council can prove that a strategy had been put in place to target these positions to the local population together with figures that show local residents are benefitting from these opportunities, then they could not see how locals could possibly benefit in any way.

Three respondents suggested that hotels do not provide high quality employment, suggesting low wages, poor working conditions and high staff turnover rates. One of these respondents suggested that hotels predominantly offer low-skilled work, limited career progression and up-skilling opportunities. Another respondent suggested that hotels should pay a levy to give Lambeth residents training for jobs with better pay and prospects.

Two respondents who neither agreed nor disagreed felt that there should be no more hotels full stop. Another respondent stated that hotel staff cannot afford to live locally as there is no affordable housing. A third respondent considered that hotels may provide employment, but it is unlikely to be high quality employment. Q+A Planning Ltd expected planning permissions to require some form of employment and skills plan for the construction and operation of a hotel to help demonstrate the economic benefits.

One respondent stated that hotels provide low pay jobs and so they did not understand the question.

Written responses

With regard to employment & training the Brixton Society supported the principle, but doubted how easily standards this can be raised through the planning system. However DP9, on behalf of CLS Holdings Ltd, stated that the proposed requirement seems to be overly onerous and argued that the career opportunities hotels provide should be recognised and additional requirements were not supported.

Statutory consultees

Wandsworth Council agreed with the approach and outlined that there may be an opportunity to secure this in Nine Elms where there are local employment schemes in place, which was a condition of the former London Plan policy.

7. Do you have any other comments?

Survey responses

17 respondents provided general comments related to hotel and visitor accommodation. The comments can be summarised as follows:

- The expansion of existing hotels is having a significant effect on residential areas and communities through increase in traffic, service vehicles, disruption during building works and pressure on parking.
- Recent proposals for hotels have been out of proportion with those around them.
- Hotels in the SW4 postcode are able to increase the number of rooms and/or the number of people per room which puts great pressure on the area and the environment.
- The council needs to consider local residents when allowing hotels permissions in residential areas.
- The development of so many hotels and luxury flats has changed the community and impact on facilities such as small shops and the provision of new schools.
- Residents of large hotels tend to be self-contained as the hotel provides what they need which can mean that local shops can lose out by being near a hotel to the detriment of local residents, particularly in Waterloo.
- The council should be clear about the kind of areas which are suitable for hotel accommodation and the kind of hotels which should be allowed to operate in particular areas, particularly in residential areas.
- The council has allowed developers to not include affordable and social housing in their developments.
- Communities in Bishop's and Prince's wards feel overrun and big developers and hotel owners are profiting at the expense of the local community.
- Residents feel it is difficult to get their voices heard and the survey is very welcome.
- Demand for hotel rooms should not be the determining factor in whether hotels or serviced flats are built in an area.
- The cumulative effect of all the proposed developments in the north of Lambeth would be devastating.
- The whole system of Health & Safety should be looked at as hotels are increasing their capacity (for example, rooms and number of beds in a room) far in excess of the original footprint through subsequent applications. There is a fire risk problem with guests staying in cramped accommodation.
- Clapham Common ward is a residential area that is at threat from hotel expansion by the Euro Hotel group.
- Brixton is local town centre and should not lose its local character. It doesn't need hotels as this brings tourists into the area who would be better serviced in central London.
- Budget accommodation (for example, Travelodge) would be useful in the central or southern part of the borough to accommodate relatives from abroad.
- Lambeth should work with Southwark around provision on the Kings/Maudsley and IOP sites which have many international visitors yet very poor hotel provision nearby.
- A significant increase in Airbnb or similar uses should be discouraged in residential areas as it reduces accommodation for long term letting.
- Lambeth planning needs to ensure there is sufficient resource and commitment to enforcing its policies and in particularly reacting to escalations and complaints from residents where commercial hotels are not adhering to policies, or ignoring failed applications.
- Lambeth requires a more holistic, considered approach to planning - in terms of use, design/style and the permanent community.
- The council should consider those who live, work, study and visit equally and there needs to be suitable accommodation, facilities and infrastructure for the whole community.
- The council needs to ensure locals can cycle safely to hotels.

Written responses

Wandsworth Council would like to further discuss the issues around Airbnb and the use of residential properties for visitor accommodation.

The Brixton Society argued that further hotel development in Brixton Town Centre should be opposed as it is a difficult location for car or coach access, plus the night economy is not conducive to a good night's sleep. Impact assessments should take account of the impact on nearby commercial activities.

One respondent stated that hotels are replacing affordable homes and noted that if plans are agreed for homes then they should remain as homes. If the use changes then an application should be started from the beginning.

Clapham Southside Avenue Residents Association reflected the experience of residents in the Clapham Common ward, highlighting the following issues:

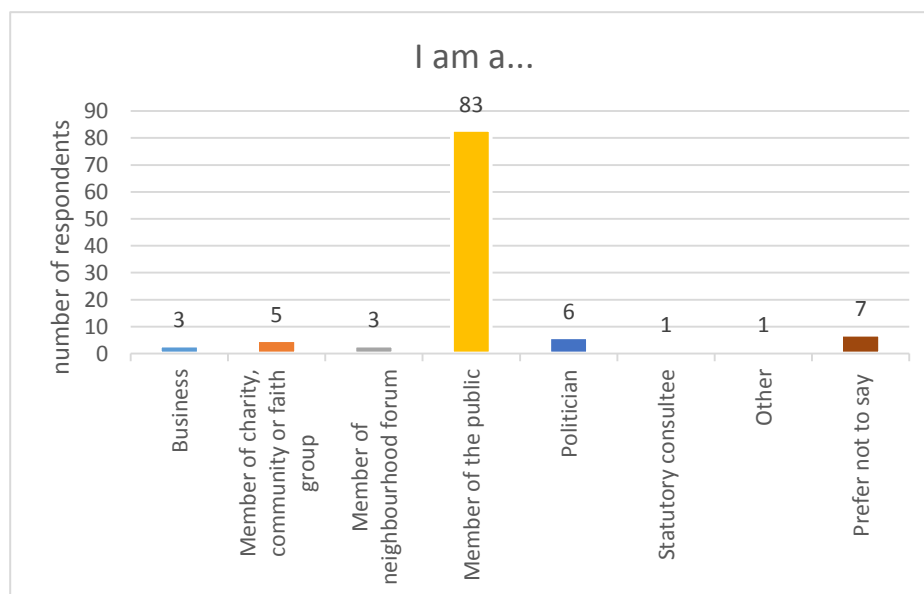
- Many entirely residential areas have good public transport accessibility but are unsuitable for hotel redevelopment. Existing policy wording needs to be altered so that public transport accessibility is just one of the criteria to ensure that development or the alteration of housing stock that adds high levels of visitor accommodation in areas which are unsuitable is not allowed. A clause relating to the number of bed spaces to the physical area of the site and original use of the site would be a useful additional criteria.
- Development in residential areas adds considerable stress on parking, servicing (including deliveries and waste collection). Where residential properties have been converted, intensification of the use of the site must be resisted. Even where public transport may be used to travel to the hotel, visitors travelling with luggage or using hotels whilst working will typically park in residential streets. The existence of public transport alone cannot guarantee that considerable inconvenience and disturbance will not be caused by both parking stress and taxi drop offs.
- Greater clarification is necessary to ensure that policy ED12 part (a)(ii) is adhered to and any expansions must demonstrate evidence of benefit to the local community and this must be over a sustained and defined period if the hotel already exists.
- Many areas of Clapham are at saturation point and it is unacceptable for commercial activity to spill over into residential communities. Any new visitor provision in Clapham outside of the town centre should be resisted.
- The reference to 'small scale' provision has been relied on to justify additional guest accommodation on sites which are already subject to intensive hotel use. Policies should make clear that reference to 'small scale' is to overall small scale and not to incremental increases.
- For budget hotels and hostels, the overall occupancy needs to be considered to reflect the real number of guests accommodated in one room, rather than just the number of rooms.
- Planning policy needs to specify additional conditions on any hotel development in primarily residential areas, where the use or construction removes existing soft landscaping, increases the height of buildings or fills in backland space. These restrictions need to be more stringent in non-CAZ or town centres.
- Conservation areas need specific protection as the nature of the buildings sought to be developed into hotel use means that conversion cannot be sympathetic and appropriate.
- Clarification and detail is needed in the policy document about what constitutes 'new development' and the requirements for compliance with accessibility and quality requirements. These requirements can currently be avoided by incremental changes.
- The 'Hotels and other visitor accommodation 2017' document is incorrect in relation to Clapham Common ward. The Eurhotel group has more rooms at locations number 6 and 7 on table 1.1. There are also several planning applications in the pipeline for expansion of these hotels which are missing from the document. Policy changes must not be made on the basis of incorrect information which suggests a need for hotel accommodation where there is no need. Existing visitor accommodation in the Clapham Common ward far exceeds that in other residential wards and no further accommodation should be provided in this ward, particularly not in the conservation area.

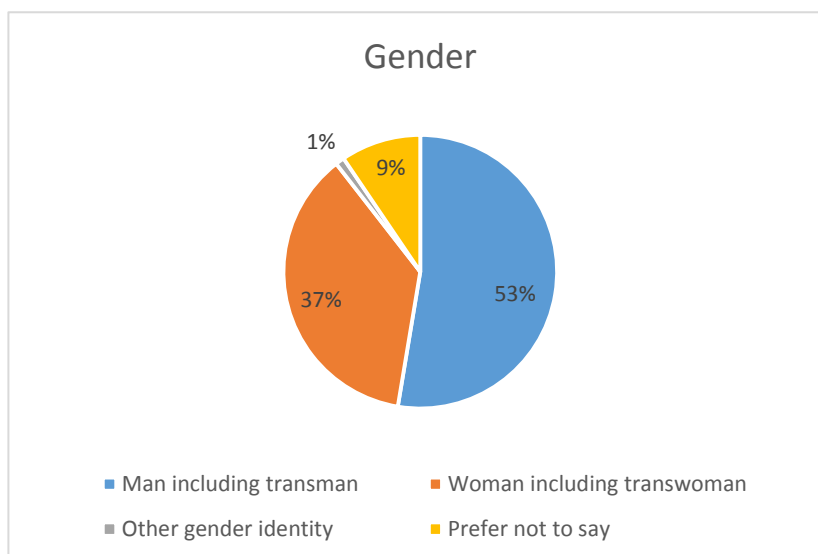
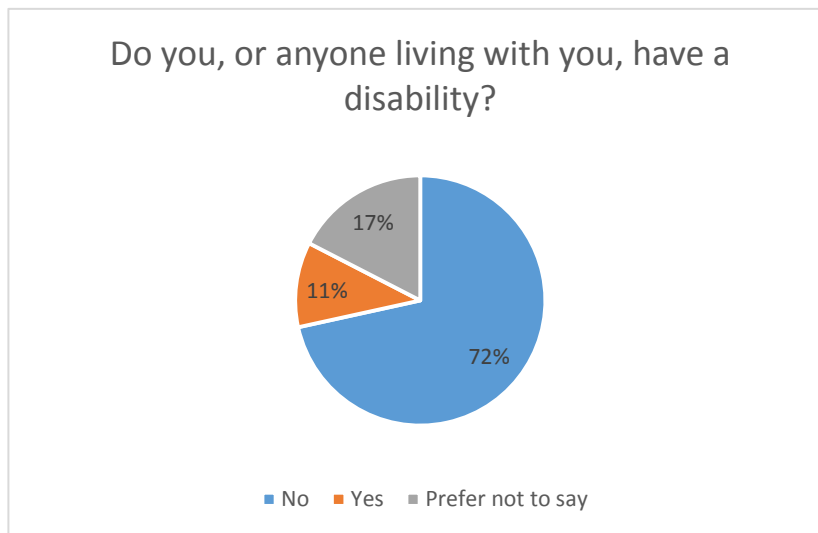
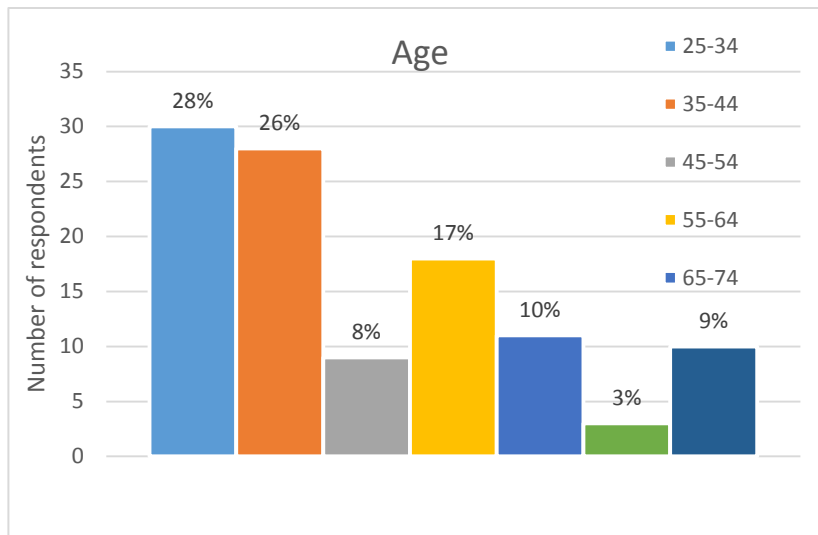
3.11. Improving air quality

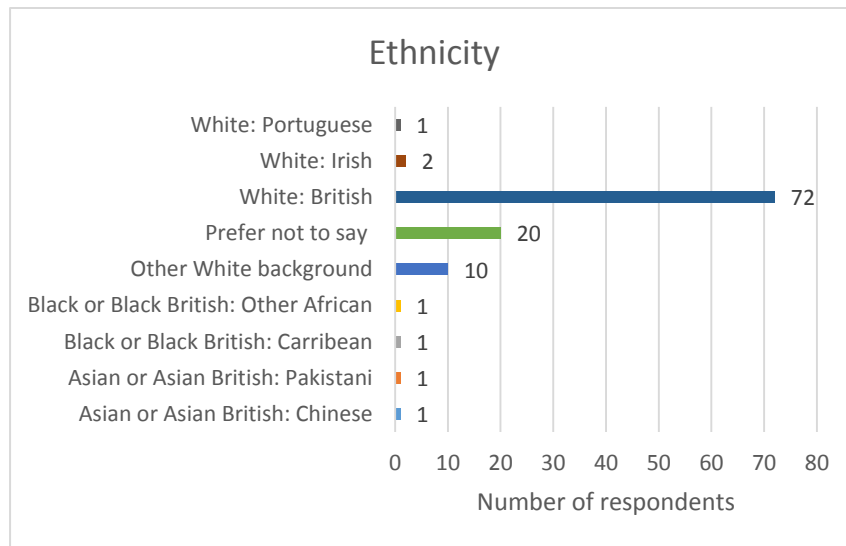
In response to the 'Improving air quality' survey, 109 responses were received. A total of 26 written responses, including statutory consultees, was received.

Survey responses

- The majority of respondents for the survey identified as being members of the public (83). Five respondents identified as being a member of a charity, community or faith group, three identified as being a member of a neighbourhood forum and six identified as being a politician. Three respondents identified as being a business and one identified as 'other'. The Port of London Authority also answered the survey. It should be noted that some respondents identified as belonging to more than one category.
- Just over half of respondents identified as being aged 25-44, with 28% of respondents identifying as being 25-34 and 26% identifying as being 35-44.
- 72% of respondents did not have a disability or live with anyone who had a disability.
- The majority of survey responses came from respondents who identified as being White British. Two responses were received from respondents who identified as having White Irish background and one respondent identified as being White Portuguese. 10 identified as being other white background. Six of these provided further detail - Dutch, Canadian, Italian, Jewish, mix of Scottish and Polish, and European. One respondent identified as being Asian or Asian British Chinese, Asian or Asian British Pakistani, Black or Black British Caribbean, Black or Black British Other African.
- Just over half of the respondents identified as being a man (including transman). 37% identified as being a woman (including transwoman) and 1% identified as being another gender identity and 9% preferred not to say.





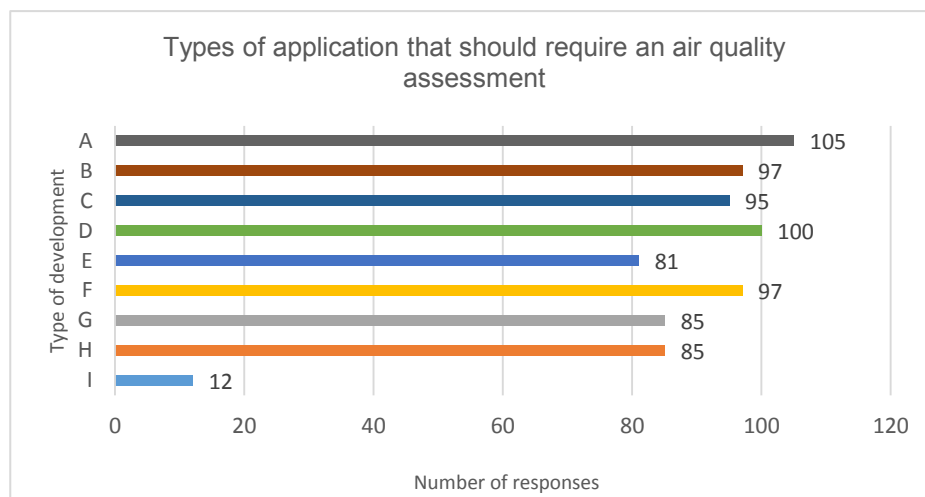


1. The new Local Plan policy on air quality will set out the types of planning application that require an Air Quality Assessment and what this should include. An Air Quality Assessment is an assessment of the impact of a development on the levels of certain pollutants in the local area. Which of these types of development should require an air quality assessment?

- Developments with potential to significantly change road traffic on busy roads
- Developments that introduce or increase car parking facilities by 100 spaces or more
- Major Developments
- Developments where people will be exposed to poor air quality for significant periods of the day, particularly for developments located on busy roads, diesel railway lines or in generally congested areas
- Developments involving biomass boilers, biomass or gas combined heat and power
- Developments for facilities used by people most sensitive to air pollution, for example schools or healthcare facilities
- Substantial earthworks or demolition
- Developments in Lambeth's Air Quality Focus Areas
- Other (please specify)

Survey responses

Respondents identified the types of application they felt should require an air quality assessment. 61 respondents felt that all of the suggested types of development require an air quality assessment.



A	Developments with potential to significantly change road traffic on busy roads
B	Developments that introduce or increase car parking facilities by 100 spaces or more
C	Major Developments
D	Developments where people will be exposed to poor air quality for significant periods of the day, particularly for developments located on busy roads, diesel railway lines or in generally congested areas
E	Developments involving biomass boilers, biomass or gas combined heat and power
F	Developments for facilities used by people most sensitive to air pollution, for example schools or healthcare facilities
G	Substantial earthworks or demolition
H	Developments in Lambeth's Air Quality Focus Areas
I	Other

Eight of the 12 respondents who answered 'other' provided suggestions of other developments that should also require air quality assessments:

- Any activity that is likely to adversely impact air quality.
- Developments where the increase in residential floorspace is over 1000sqm as the correct legal definition of major development is all developments comprising over 1000sqm (including housing).
- The investment or purchasing of energy and synchronising of utility road works.
- Commercial use of green spaces even if temporarily as they cause unwanted pollution in areas of wildlife and sanctuary.
- Development that includes new means of public transport, for example buses.
- All developments that have onsite diesel generators.
- All developments which require more than 20 vehicle movements for construction or demolition.
- Developments where there is any conversion of community facilities.
- Developments where there is any proposal for loss of green space.
- Developments on or adjacent to any major thoroughfare, for example Coldharbour Lane.

One respondent commented that the detail to be included within assessments for different types of development will vary greatly depending upon a number of factors, including the scale and location of development. This respondent argued that it would not be prudent to impose strict requirements for air quality assessments upon all of the identified types of development (in question 1) and instead the scope of assessments should be determined through discussions between the council and the applicant.

Respondents' reasons for their responses mostly related to health. Specific areas identified as having poor air quality included Streatham High Road, Valley Road, West Norwood, Tulse Hill, Brixton town centre, Coldharbour Lane. Many respondents made reference to Lambeth generally.

Written responses

A response on behalf of Cashco agreed that the above types of development should seek to provide an air quality assessment but argued that the detailed for different types of development will vary greatly depending on a number of factors, including the scale and location of development. Assessments must respond effectively to the proposals and the anticipated impact of these upon air quality within the area in which the site is located. The developer argued that it would not be prudent to impose strict requirements for air quality assessments upon all identified types of development, and instead, the scope of assessments should be determined through discussions between the Council and the applicant.

Statutory consultees

Wandsworth Council and The Port of London Authority supported the requirement of an air quality assessment for all of the suggested types of development.

2. Developers can be required to mitigate impacts of poor air quality by:

- Mitigating the impacts of construction
- Mitigating the impacts of development on air quality in the surrounding area
- Mitigating the impacts of existing poor air quality in the surrounding area on those who will occupy the development

Are there any other measures you think developers should be required to use to mitigate impacts of poor air quality?

49 respondents suggested additional measures developers should be required to use to mitigate impacts of poor air quality, with five of the respondents supporting the mitigation measures set out in Question 2. One respondent argued that mitigation measures should be informed by an appropriate air quality assessment as it would not be appropriate for a policy to influence mitigation measures without a full understanding of the development, its impact on air quality and appropriate measures to address the adverse impacts. Other mitigation measures suggested by respondents included:

- Tree planting, greening and green spaces was suggested by 10 respondents.
- Passivehaus standards.
- Prioritising green companies.
- Upgrading nearby housing with glazing and air filters.
- Setting back development away from the road.
- Allowing fewer developments, rejecting high rise buildings or buildings on air quality grounds.
- Including lockers in mixed-use development to allow for shopping deliveries to help being car-free.
- Including renewable energy in developments.
- Refurbishing or retrofitting buildings and estates rather than demolition.
- Offsetting the pollution caused by development, addressing both the emissions generated from developments and protection for occupants from ambient pollution.
- Forecasting 10 year maintenance/plans and life cycle of materials that justify their long-term use.
- Increasing the number of air quality focus areas.

Transport

- Encouraging public transport use and car sharing.
- Increasing car parking facilities in Streatham from which commuters can take public transport.
- Extending congestion zone and pushing for a London-wide Ultra Low Emission Zone.
- Making car use more difficult, reduce car parking for new residential developments and deter car ownership in the north of the borough by removing controlled parking permit rights.
- Electric vehicles and charging points were suggested by five respondents.
- Using back roads for materials delivery.
- Decreasing the number of deliveries.
- Increasing cycle parking, segregated cycle lanes and cycle hoop hangers.
- Adhering to engine idling laws.

Construction sites

- Enclosing construction works and loads of vehicles to contain fumes and particles
- Encouraging employees to walk and cycle to construction sites, leaving tools at work.
- Exhaust fumes from on-site generators need better solutions and on-site diesel generators should be banned.
- Construction vehicles should be latest Euro standard.
- Using river for transport and only finish journey by road.

Written responses

A response on behalf of Cashco supported the mitigation measures and stated it would ensure the impacts of poor air quality as a result of a development are effectively mitigated against at all stages of a development. It is necessary for the mitigation measures to be imposed to reflect the development proposals and the impact it is expected to have, and at what stage of the development.

Furthermore, whether the development is located within or outside of an Air Quality Focus Area should be given further consideration, as this will further influence the level of mitigation measures to be incorporated. Measures to be incorporated should be fully informed by an appropriate Air Quality Assessment, the findings of which have been agreed with the Council, it would not be appropriate for a policy to further influence mitigation measures without a full understanding of the development, its impact upon air quality and appropriate measures to address any adverse impacts.

Statutory consultees

The Port of London considered that as part of the mitigation measures developers should be required to consider, as part of an air quality assessment, whether the River Thames can be used for the transportation of materials and waste, particularly as part of the construction phase of a proposed development. Although there are no Safeguarded Wharves within the borough, there are a number in the neighbouring London Borough of Wandsworth, which could serve to transport waste and materials by river rather than by road. This will play a key role in ensuring developments are built more sustainably, by reducing air pollution and road congestion as part of the construction phase, and maximise the use of the River Thames through the supply chain. This would also support the PLA's Thames Vision document (2016) which includes a goal to move more goods and materials off roads and onto the river, serving to reduce air pollution and road congestion. The PLA agreed that Travel Plans should be submitted as part of developments to encourage residents, staff and visitors to use more sustainable modes of transport rather than rely on car use. The PLA considered that River Transport must form a part of the sustainable transport options that are included in submitted Travel Plans.

Wandsworth Council commented that the testing of air quality will have to be done against an existing evidence base and suggested roof greening, transport and kerbside initiatives to improve air quality. Wandsworth also suggested that design is key to improving air quality which can be done in conjunction with placing new developments in suitable locations, near transport links, to reduce the reliance on cars.

3. Any other comments?

Survey responses

24 respondents made comments related to air quality. Many made reference to health implications and their experience of poor air quality in the borough and disappointment with the borough's air quality. Many respondents linked poor air quality to transport. Suggestions for improvements included:

- Enforced 20mph speed limits.
- Congestion and emission charge for Lambeth.
- Car-free days.
- PHEV and electric charging points.
- Green fuelled buses.
- Turning engines off for stationary and/or parked vehicles.
- A London-wide ultra-low emission zone.
- Moving the location of bus garages in the borough to more remote areas more remote areas.
- Enforced traffic reduction in areas that fail air quality standards.
- Introducing a bike scheme for the borough including electric cycles.
- Introducing low emission neighbourhoods and ultra-low emission neighbourhoods.
- A clean bus corridor along the A23 between Streatham and Brixton Hill

- Consider the flight path to Heathrow
- Improving conditions for walking and cycling.

Four respondents related air pollution to development:

- Carnegie library was considered to be an example of how not to do things. It was argued it is an air quality negative development by changing from a use accessed by foot to a gym accessed by cars that also involves lorry loads for basement excavation works.
- Increase the number of solar panels on council owned buildings and require all new developments to go beyond tokenistic BREEAM building standards.
- Resist the Mayor's policies to build over green spaces and back gardens.

Some respondents expressed strong concern on the council budget for air quality (£31,000) and would like to see spending increased on improving air quality. Others commented that there shouldn't be a focus on just air quality focus areas, but all areas with poor quality, with a special focus on all main thoroughfares, particularly A-roads. Improving air quality in Lambeth and reducing carbon emissions should be a central priority of local decision- making.

Streatham Wells Labour Councillors and 2018 Candidates commented that they strongly support Lambeth Council's continued progress on air quality improvement proposals, including via the Local Plan. They welcomed the steps to ensure that new developments play their part in being air quality neutral or positive, and contribute to mitigating air quality problems both on site and locally. They noted it is particularly positive to see strong encouragement of sustainable travel methods, greening initiatives and the mitigation of construction pollution. The councillors considered that major developments should be planning for the future with the inclusion of renewable energy production, electric car-charging and car club access. Those carrying out air quality assessments must share the data and results in full with the Council for transparency and ease of collaboration on this vital work. The Air Quality planning guidance note should form part of the Local Plan, if this would help give it more weight in planning policy.

Written responses

One response was received from the parent initiative Mums for Lungs, which was supported by 12 respondents stating association with this group. In total, 22 respondents raised the following issues:

- High levels of pollution affecting children's health causing preventable respiratory illnesses and stunted cognitive and lung development and affecting elderly too with links to cancer and dementia.
- Lambeth is one of the most polluted boroughs in London and that efforts of Lambeth Council have had no significant impact in reducing pollution over past seven years.
- Bring Lambeth's air pollution levels, including outside schools and nurseries, within legal EU limits by 2020.
- Increase budget allocated to air quality - £31000pa is disproportionate to gravity of health crisis.
- Appoint a dedicated Cabinet Member for Environment and Air Quality with clear goal to bring pollution to legal EU limits by 2020.
- All construction development plans must require stringent air quality assessment and enforcement.
- Discourage vehicle idling.
- Increase car parking charges for diesel vehicles in the borough.
- Implement the Clean Bus Corridor from Streatham High Road to Brixton Hill in 2017.

The Brixton Society stated that air pollution is not limited to noxious or greenhouse gases or particulates. This respondent considered that the existing Plan is vague on requirements for extract ventilation from catering establishments so it fails to protect neighbours from intrusive cooking smells.

Statutory consultees

The Environment Agency supported the reference to the existing London Plan and recommended reference to both the forthcoming London Environment Strategy and London Plan policies in respect of air quality and waste issues and their closer integration into the planning process.

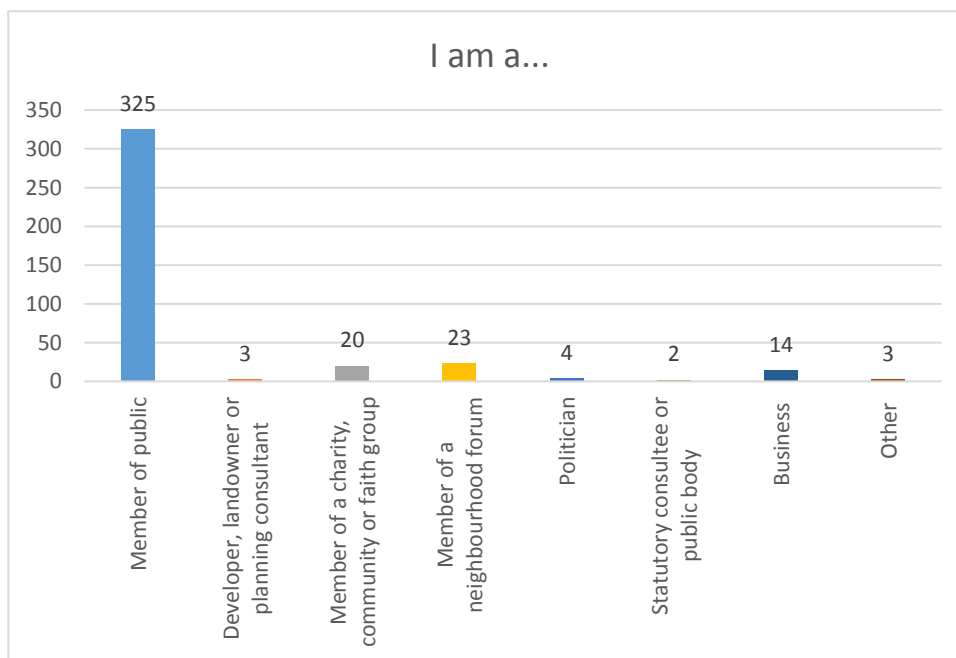
Lambeth Air Quality Action Plan Steering Group
Phoenix House, Lambeth 18/10/2017 18:00-20:00
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Vanessa Rodgers (Senior Planning Policy Officer), Andrew Round (Sustainability Manager), Matthew Browning (Sustainability Officer), Marie Vieu (Public Health Consultant) Steering group attendees- Sandy Nuttgens, Janet Williamson, Charlie Holland, Pascal Durrenberger
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017. It was advised that this is the first stage of consultation and there will be a second round of consultation in autumn 2018 which will take account of the Mayor's draft London Plan.
General points made by steering group attendees Steering group attendees asked about community spaces and car free areas. Council officers advised this was not a specific topic in the review but we will look at any consultation feedback we receive. Steering group attendees asked about transport and infrastructure needs. Council officers advised that we need to ensure we can accommodate the level of growth need, for example school places. It was asked whether we could have a policy similar to Islington that stops land banking and vacant housing. Council officers advised this is something that will be considered. Steering group attendees asked about amendments to planning permissions once consent has been granted and if the council is on top of this. Council officers advised that this is a judgement call based on the nature of the planning application and that the level of amendment should be limited.
Air Quality Steering group attendees asked about enforcing mechanisms and how developments are being assessed. Council officers advised that we currently work to the London Plan and air quality neutrality. The Environment Strategy suggests that air quality positive will be addressed in the new London Plan. The Lambeth Local Plan provides an additional level of policy. For something to be enforceable, it has to be very specific such as car parking provisions and the best conditions are very clear and enforceable. Steering group attendees questioned air quality neutral. Council officers advised that they are hopeful that air quality positive is addressed in the draft London Plan. Steering group attendees asked if there was a limit to the number of developments that can occur in a location at one time. Council officers advised that there is no limit and this is unlikely to happen as there is a need to be 'pro-growth'. Additional controls on construction and dust management in opportunity areas were suggested. Attendees also asked whether they should lobby central government for 'pro-green growth' and not just 'pro-growth'. Steering group attendees questioned the 1 in 5 parking space provision for electric cars. It was advised we take our lead from the London but we could make changes based on local evidence. Steering group attendees suggested developments have to consider CPZs in surrounding areas to reduce their impacts. It was advised that this could be used alongside planning policies. Some of the sections in the consultation questions were queries. It was advised that some of the figures are taken directly from the London Plan.

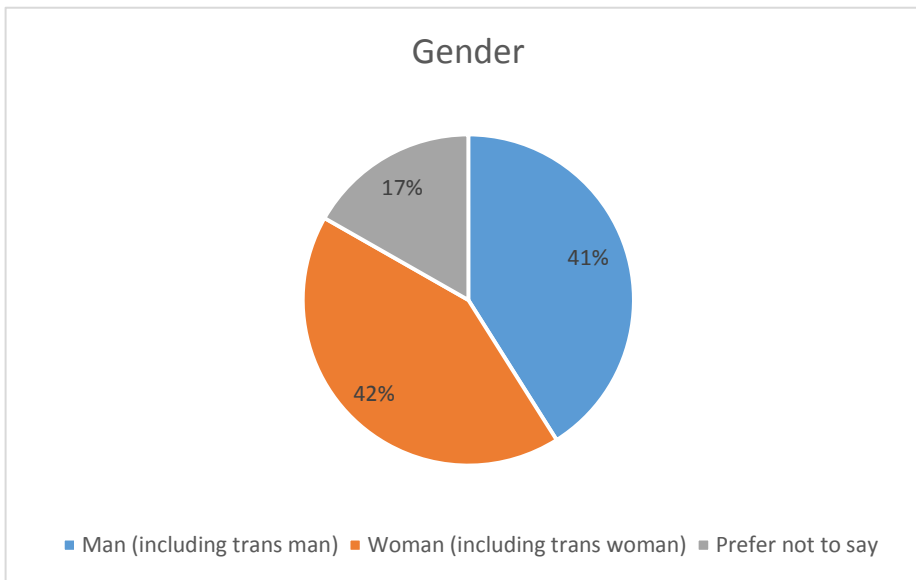
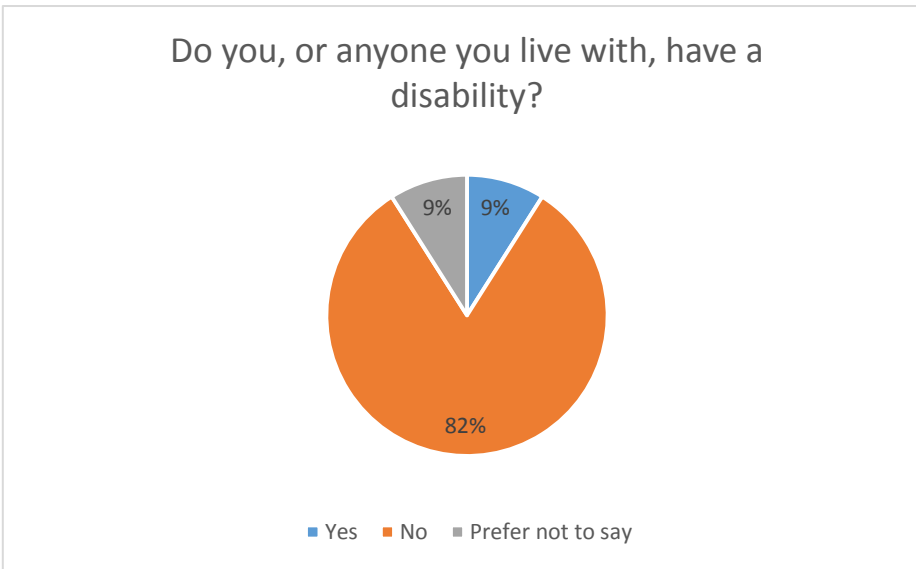
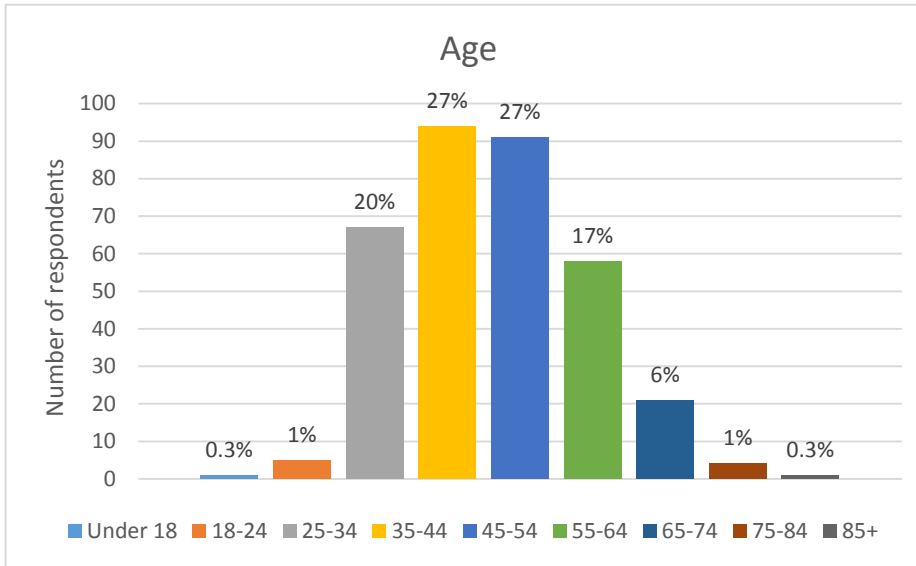
3.12. Transport

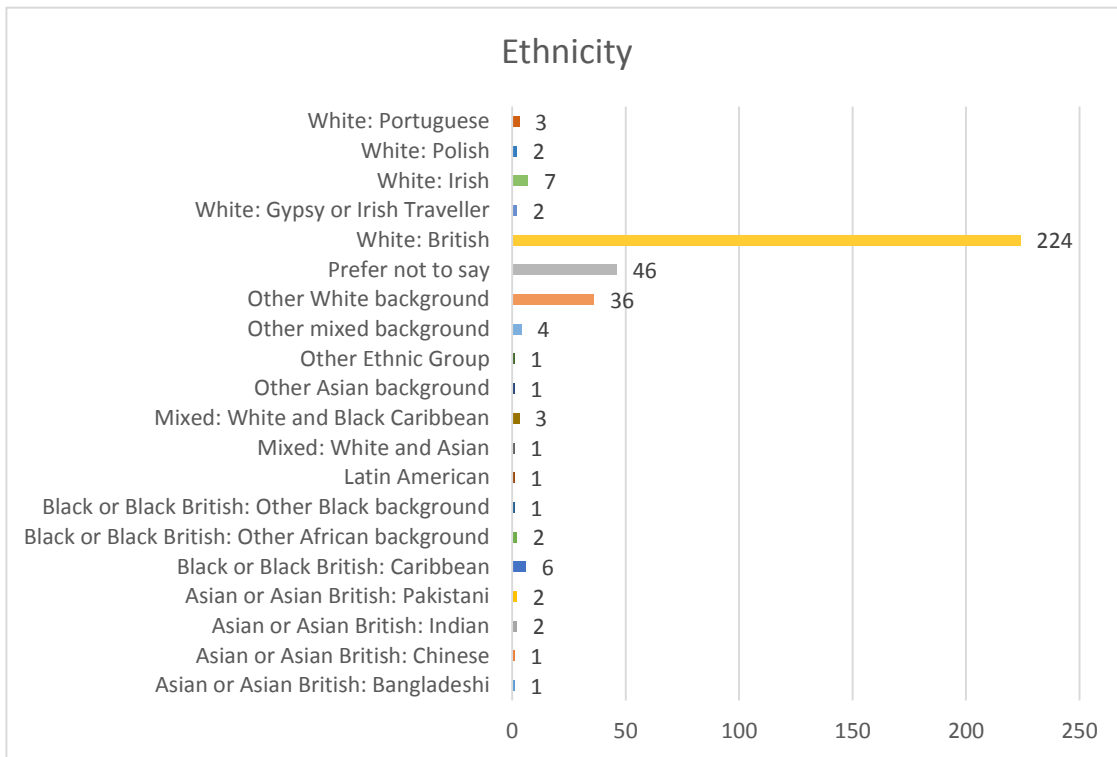
In response to the 'Improving air quality' survey, 346 responses were received. A total of 10 written responses, including statutory consultees, was received.

Survey responses

- The majority of respondents for the survey identified as being members of the public. The second largest group were members of a neighbourhood forum followed by members of a charity, community or faith group. It should be noted that some respondents identified as belonging to more than one category.
- Just over half of respondents identified as being aged 35-54. Less than 2% of respondents identified as being under the age of 25.
- 9% of respondents said they had or lived with someone who had a disability.
- 41% of respondents identified as being a man and 42% a woman. The remaining respondents preferred not to say.
- The majority of survey responses came from respondents who identified as being White British. The second largest group preferred not to say followed by respondents with another White background. Seven respondents identified as being White: Irish and six respondents identified as being Black or British: Caribbean.



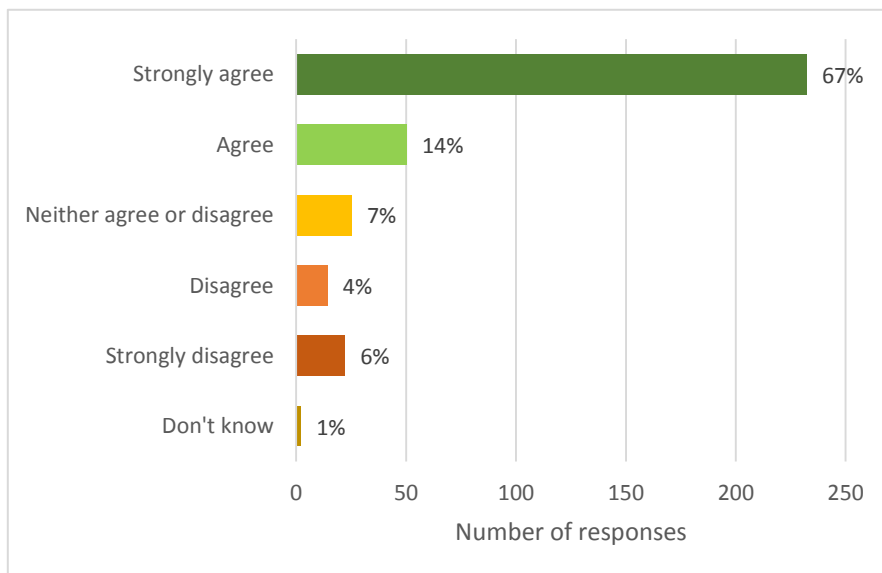




1. Our long term objective should be to encourage more people to walk, cycle and use public transport rather than travel by car. To what extent do you agree or disagree with this statement?

Survey responses

A total of 345 participants responded to this question. The majority of respondents agreed or strongly agreed with the objective to encourage more people to walk, cycle and use public transport rather than travel by car (81%). 10% disagree or strongly disagree. The remaining 8% of respondents neither agreed nor disagreed or said they did not know.



The majority of the respondents agreed or strongly agreed with the objective to encourage more people to walk, cycle and use public transport rather than travel by car. 84 respondents stated that car use has significant impacts on human health, quality of life, wellbeing and the environment and argued:

- The encouragement of alternative modes of transport can reduce harmful air pollution, traffic congestion, noise and road accidents.
- The physical exercise involved in walking and cycling can have great benefits to human health.
- Car owners are the minority of the population and the cost created to the society from the negative impacts of car traffic is disproportional.
- The car is an inefficient mode of transport in terms of urban space utilisation and creates less attractive communities while it is dangerous for vulnerable road users.

Four respondents stated that there is a need for safer cycle routes and dedicated cycle lanes. One respondent suggested that there should be a reference to Thames River Bus services as part of public transport whereas another one that car clubs should be promoted. Another respondent suggested that car travel to public transport stations should be discouraged especially in areas where there is frequent bus service e.g. Streatham High Road.

An individual who neither agreed nor disagreed stated that car use is beneficial for the government since it creates income and that money can be spent on other areas. Respondents who disagreed or strongly disagreed suggested that the increase in electric vehicles could potentially reduce traffic, air pollution and parking demand. Other respondents who disagreed or strongly disagreed argued that travel is a personal choice. However, one respondent felt that car travel should be discouraged for school trips whilst another suggested that more police are needed on the street to increase security levels whilst walking.

19 respondents stated that car trips are often necessary and that people with restricted mobility and vulnerable users should be considered including those who are disabled, elderly or ill. It was also stated that car trips are necessary for specific activities such as carrying heavy goods, shopping or traveling with children or when the weather conditions are bad.

14 respondents argued that public transport is currently not efficient and often overcrowded and that some parts of the borough are not adequately served. They argued that the objective should be supported by reliable and fast public transport with greater capacity or even new forms of public transport like tram services. In particular, an individual stated that West Norwood and Streatham need the support of the tube, Overground, or Crossrail 2 similarly to the north of the borough. It was argued that Crossrail 2 should be fully supported to relieve pressure on the Northern line whereas Southern Rail is unreliable as well as 417 and 315 bus services.

Written responses

Loughborough Junction Action Group and Loughborough Junction Neighbourhood Planning Forum are concerned that many of the pavements in Loughborough Junction are not conducive to safe walking and support any policies on widening of footpaths to be strengthened.

Statutory consultees

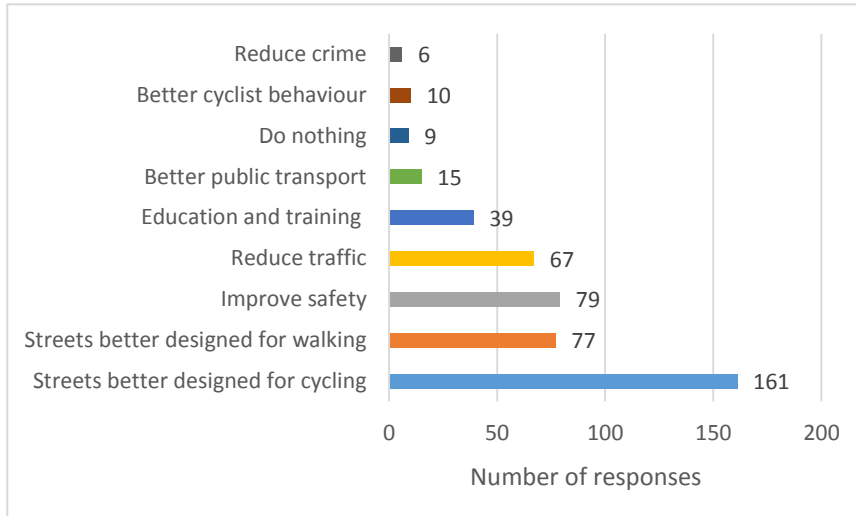
TfL Borough Planning supports Lambeth's long term objective to promote sustainable travel and encourage walking, cycling and the use of public transport. Increasing the safety and perception of sustainable travel and London's roads is vital in meeting these objectives and TfL welcomes policies, along with future projects to improve this. As identified in the surveys, it is also essential that the transport infrastructure/networks are developed and upgraded to accommodate the growth and additional demand.

TfL Commercial Development supports the long term objective, which accords with the Mayor's Draft Transport Strategy and Draft London Plan. By promoting the sustainable, mixed-use development of its sites, including those at or adjacent to transport infrastructure, TfL has a key role to play in helping the borough meet this objective.

2. We need to make walking and cycling as safe as possible so that no-one is put off because our streets are inaccessible or feel unsafe. What do we need to do to encourage more people to walk and cycle?

Survey responses

308 respondents commented on what more needed to be done to encourage more people to walk and cycle. The most frequently mentioned topics are shown below.



The most supported actions were better designed streets for pedestrians and cyclists, improved safety and reducing traffic. Traffic reduction measures included:

- Closing residential streets to through traffic.
- Reducing parking availability.
- Reducing road capacity for private motor vehicles.
- Charging to make driving less attractive.

The following suggestions were made in relation to better designed streets for cycling:

- 65 respondents wanted segregated cycle lanes.
- 30 respondents wanted cycle lanes without specifying segregation.
- 29 respondents wanted more and/or better cycle parking.
- 26 respondents wanted better infrastructure without specifying what.
- 21 respondents supported more Quietways or backstreet routes.
- 2 respondents wanted local routes, rather than strategic ones to central London.

The following suggestions were made in relation to better designed streets for pedestrians:

- 20 respondents suggested better or more frequent and longer crossing points.
- 19 respondents wanted better maintenance or quality of footways.
- 9 respondents wanted wider pavements.
- 13 respondents suggested better lighting.
- 6 respondents suggested a reduction in street clutter.
- 19 respondents wanted better pedestrian environments more generally.

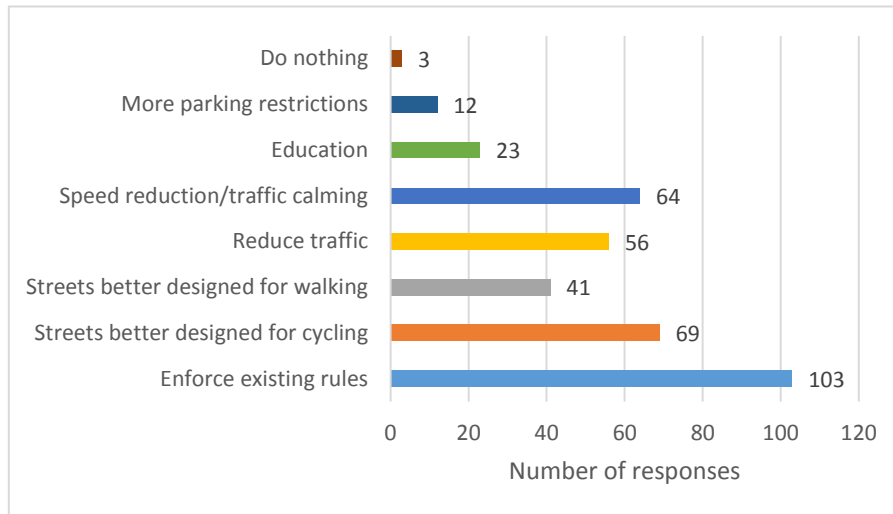
Statutory consultees

TfL Commercial Development set out that the Mayor's Draft Transport Strategy sets out the 'healthy streets' approach to reducing car dependency and increasing active and sustainable travel, particularly Chapter 3. TfL will work closely with the borough to support implementation of the 'healthy streets' approach.

3. What more can we do to reduce road danger in the borough?

Survey responses

A total of 287 respondents outlined different point of views regarding the reduction of road danger in the borough. The most popular suggestion was enforcing existing rules followed by streets better designed for cycling and speed reduction/traffic calming.



Reducing speed was the most commonly referenced issue, through the better enforcement of existing rules or traffic calming measures. People also echoed the views given in the previous question that reducing traffic and better street design was needed to road reduce road danger in order to get more people walking and cycling.

Respondents often cited the high level of through traffic and 23 respondents argued the need to reduce rat running or ensure that minor residential roads were for access only. Four comments referenced emissions charging or higher motoring costs needed to affect this change.

23 respondents argued for better education for drivers, cyclists and pedestrians. 11 respondents wanted greater parking restrictions, with four respondents CPZs. On the other hand, one respondent wanted to increase the amount of free parking.

In terms of enforcing existing rules, the following suggestions were made:

- 83 respondents wanted speed limits enforced.
- 31 respondents specified they wanted enforcement of 20mph limits.
- 23 respondents wanted more speed cameras or to enforce red lights.
- 9 respondents wanted enforcement against illegal cycling.
- 4 respondents wanted better policing of pedestrian behaviour at crossings.
- 4 respondents were concerned with scooter and motorbike behaviour.
- 4 respondents referenced enforcement of mobile phone use.
- 1 respondent wanted enforcement against drug/drink driving.
- 12 respondents wanted better enforcement of traffic rules generally.

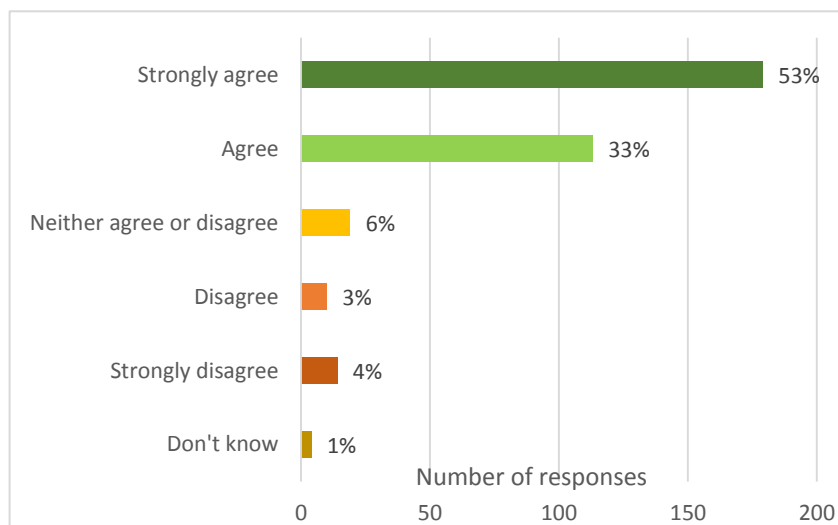
4. The council does not control public transport in Lambeth, but we work closely with Transport for London and other partners to influence future provision. The key public transport improvements we have identified as important in future are as follows:

- Increasing capacity on the Northern Line Kennington Loop
- Enhancements to Thameslink services
- Crossrail 2
- Capacity improvements at Waterloo and Vauxhall station
- Improved interchanges including better access for walking and cycling
- Improved east-west orbital routes
- Better integration of rail services in the Streatham area
- Metro style 'turn up and go' services at Lambeth rail stations
- Train lengthening and additional stops at Lambeth rail stations on services into London termini
- Improvements to facilities and step free access at Lambeth stations
- Increased service frequency on underground lines
- Improvements to bus services with new services in growth areas and where connectivity is poor
- Introduction of low emissions buses on all routes

To what extent do you agree or disagree that these should be the priorities for public transport in Lambeth?

Survey responses

Of 339 participants, 53% strongly agreed that these should be the priorities for public transport in Lambeth. 33% agreed and 7% either strongly disagreed or disagreed. 6% neither agreed nor disagreed and the remaining 1% did not know.



The majority of the respondents either agreed or strongly agreed with the suggested key public transport improvements stating that these interventions can reduce air pollution, encourage cycling and walking, discourage car use and support a more safe and sustainable community. It was suggested that projects should be prioritised based on improvements in access, reliability, integration and capacity given the increasing housing, population and congested network. Many respondents argued that south Lambeth, in particular Streatham, should be better served by public transport including additional tube service, more efficient rail service and more frequent bus service.

In particular for Streatham area, a respondent suggested to extend the tube in Streatham while another one suggested to introduce Crossrail 2 in the area. An individual stated that there is a need for better integration between Streatham train stations whilst another respondent suggested that Streatham should be better connected to the Overground and to Croydon area.

In terms of bus services, respondents made the following suggestions:

- More frequent routes between east and west of the borough.
- Buses serving the South Circular route.
- Better connectivity between Streatham and Catford, Norwood, Dulwich, Wandsworth Town centre.
- Better bus services around Camberwell Green and Vauxhall.
- Keeping bus lanes clear to achieve faster services.

Regarding rail services the following issues were identified by respondents:

- Three individuals stated that Southern rail service is unreliable including delays and disruptions.
- Two argued that Thameslink service is poor.
- Four respondents suggested prioritising improvements at the Overground service which should be better integrated including better connection between Clapham High Street and Denmark Hill overground stations.
- Some respondents stated that the Northern Line stretch between Balham and Clapham North is busy and that there is a need to increase capacity especially south of Kennington.
- The Victoria line should be extended to the south.
- Clapham Common, Clapham North, Loughborough Junction, Oval and Vauxhall stations are overcrowded in the morning and difficult to access.
- Four respondents stressed the importance of step free access to stations.
- A better fee structure is needed as rail is much more expensive than other modes of public transport.

Some respondents argued that focus should be given to walking and cycling including safe and dedicated cycle paths with safer access to public transport and safer junctions. Furthermore, alternative fuels and low emission vehicles supporting clean public transport were considered as important by three respondents.

Of the respondents who neither agreed nor disagreed or didn't know, the following suggestions were made:

- The bus service to Brixton and from Croydon is inadequate and that better service should be provide from Mitcham to Streatham.
- Train services from Balham to Streatham and Norbury is inadequate and trains should run more frequently in Streatham.
- Brixton should be added to the Overground service.
- Cycling should be prioritised together with a reduction in car use.
- A new Cycle Superhighway should be implemented.
- Improvements to river services, specifically better piers, better integration and promotion should be considered.

Of the respondents who disagreed or strongly disagreed with the public transport priorities, the following suggestions were made:

- Priority should be given to Southern rail.
- Crossrail 2 or a tube extension to Streatham should be prioritised.
- There should be improvements to frequencies of existing rail services.
- Opening of Brixton East and connection of Loughborough Junction to the Overground.
- Need to establish reliable rail services and monitor disruptions.
- The number of buses on the road should be decreased.
- There are safety concerns whilst travelling by rail.
- Cycling strategy and protected cycle lanes.
- Car users and the provision of parking spaces should be considered.

5. Are there any other improvements that you think are important?

Survey responses

174 respondents answered this question and many raised similar issues raised in Question 4.

Many respondents stressed the importance of step free access to public transport, with respondents arguing that patients of St Thomas' and Kings College hospitals should be able to use public transport too. It was also argued that the existing rail infrastructure should be more efficient, reliable with better timetables and integration among different modes. Two respondents argued that access to rail should be free for children and another two that cost of public transport should be reduced. An individual suggested to provide free public transport to all Londoners.

In relation to Streatham, one respondent argued that rail service in Streatham Hill station should be improved in terms of frequency, capacity and accessibility. Another one stated that accessibility of Streatham Common by Streatham Road is poor.

11 respondents suggested an additional Overground stop in Brixton or Loughborough Junction whilst another respondent suggested an Overground station in Streatham. In terms of new rail services, other suggestions included:

- Streatham should be served better either by the tube or Crossrail 2.
- Re-opening of Camberwell Station.
- A new station between Loughborough Junction and Elephant and Castle.
- Tube service to Clapham Junction.
- A Thameslink station in Borough Road.
- Include Oval station in the Northern line extension.
- Improvements to Southern Rail services.
- More frequent Thameslink services.

In terms of car traffic many respondents argued that traffic conditions should be improved around Brixton station, with improved safety for pedestrians and cyclists. One respondent suggested that part of Brixton Road should be pedestrianized. Two respondents argued that vehicle traffic in local streets such as Lyham Road and Kingswood Road should be restricted. Other suggestions included:

- Discouraging vehicle use near schools during the school run.
- Enforcing speed limits up to 20mph.
- Penalising bad driving behaviour of car drivers and provide driving behaviour training to bus drivers.
- Creating car free routes.
- Improving access to Gatwick.
- Decreasing the amount of through traffic.
- Delivery companies should be required to organise deliveries more effectively.

Regarding bus services many respondents stated that reliability should be improved. This included imposing penalties to unreliable modes, giving advance notice regarding bus service disruptions and providing information at all bus stops. Two respondents argued that there should be additional bus stops. One individual suggested giving priority to buses and keeping bus lanes clear. Another respondent proposed the replacement of double decker buses with single decker buses according to demand. Two respondents stated that bus fleet should be only composed of electric vehicles. One respondent suggested introducing express bus services with less stops for particular high demand routes.

The following new bus routes and other improvements in current services were suggested:

- A bus route linking Brixton with Elephant and Castle via Knatchbull Road.
- Bus links among Kennington Cross and Victoria Station via Lambeth Bridge.
- Bus to Euston starting from Kennington Cross.

- Increase the number of buses crossing the river to West London.
- Expand dedicated bus lanes to Camberwell New Road and remove delivery bays during peak hours.
- Retain Vauxhall Bus Station as it is.

Some respondents supported extending Tramlink, with suggestions of a north-south tram along Brixton Road, a tram to from Streatham to Brixton and tram links to Clapham Junction.

An individual stated that road space for cars should be reduced so there is more space for buses and pedestrians. Another one suggested the re-allocation of road space to more efficient modes, for example cycling, in areas like Streatham which are over-reliant on bus services.

14 respondents argued that there should be more protected and segregated cycle lanes. A respondent stressed the need for an extended cycle network to the south of the borough whereas another one stated that there should better connectivity. A couple of respondents argued that secure cycle parking and storage should be provided to businesses, residential areas and shopping areas. It was also frequently stated that there is a need for more cycle hire facilities and docking stations or even a dockless cycle hire scheme.

Many respondents mentioned that the integration of public transport and cycling and walking is needed, with more cycle parking or docking stations near public transport hubs, better signposting for pedestrians and better access by bike to public transport. A respondent stated that priority should be given to pedestrians and cyclists at traffic lights. Another one suggested to provide dedicated public transport for cyclists. Respondents argued that encouraging walking and cycling will increase capacity on the roads and infrastructure. Another respondent stated air pollution should be tackled and free pollution masks should be provided for those who cycle.

Nine respondents out of those who neither agreed or disagreed or didn't know to the proposed list of public transport priorities suggested further improvements. Respondents stressed the importance of being able to take a bike on the train whilst another argued that more frequent trains at West Norwood and Tulse Hill are needed due to increasing demand. Some suggested removing Vauxhall bus station whilst one respondent argued that a CPZ should not be implemented in south Lambeth.

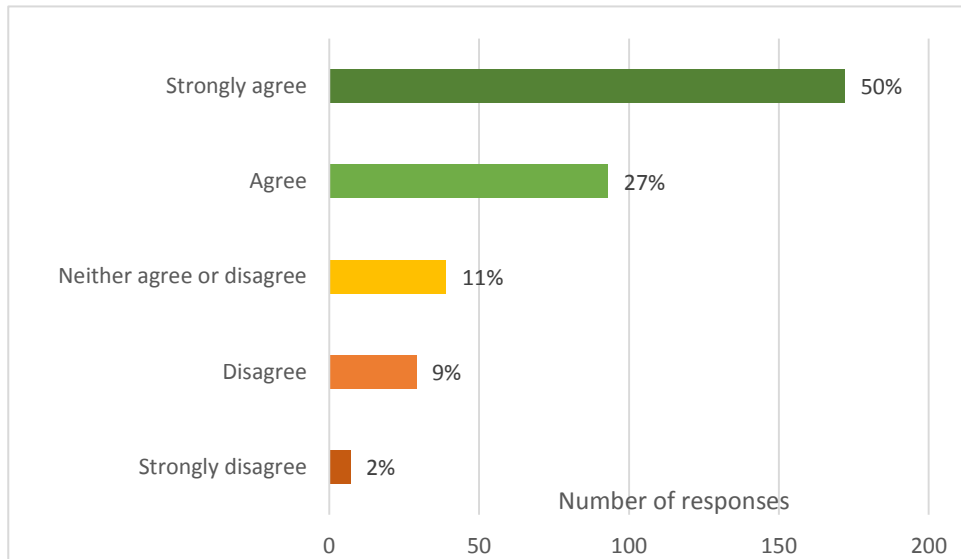
Written responses

Loughborough Junction Action Group and Loughborough Junction Neighbourhood Planning Forum argued that a number of sites close to Loughborough Junction station are likely to be developed over the next five years and this will require improvements to the local transport infrastructure. This includes improved access to the station by providing a lift and new stations on Thameslink and on the Overground. JLAG supports the conclusions of the feasibility study on the financial viability of building an Overground stop between Denmark Hill and Clapham High Street but would like to ensure there is a signed walking route directly from Loughborough Junction station. LJAG support the reopening of Camberwell station as an additional stop on Thameslink between Loughborough Junction and Elephant and Castle on south east trains between Denmark Hill and Elephant and Castle.

6. Bus journeys are affected by congestion and this is forecast to worsen when traffic levels increase. We should give more priority to buses by providing bus lanes for example. To what extent do you agree or disagree with this statement?

Survey responses

Of 341 respondents, 77% of respondents strongly agreed or agreed that more priority should be given to buses. 11% neither agreed nor disagreed and 11% strongly disagreed or disagreed.



Of the respondents who agreed or strongly agreed, many respondents argued that dedicated bus lanes can lead to better bus traffic flow, less congestion and air pollution leading to a more attractive bus service. It was also suggested that shorter and more reliable bus journeys as well as improved cycling and walking options can potentially reduce private car use. Two respondents referred to Walworth Road or Streatham as a successful example of giving priority to buses.

Respondents argued that the car is an inefficient mode of transport in terms of space and modes that carry more passengers and occupy comparatively less space should be prioritised. Two respondents pointed out that bus is often the mode used by less advantageous people whereas another one that bus is the cheapest public transport mode and these points should be taken into consideration. Some respondents suggested that bus lanes should be shared only with cyclists whilst others were concerned that bus traffic might conflict with cyclists and argued that walking and cycling paths should be separated from the rest of the traffic.

Respondents offered the following suggestions:

- Bus lane operating times should be extended and better regulated with additional enforcement.
- Smart traffic lights could give priority to buses and decrease journey times.
- Parking bays should be removed from bus lanes.
- Parking should not be allowed at any time on red route.
- A more comprehensive parking strategy is required for parking demand, especially for those carrying goods.
- Minimising bus stops in order to regulate bike and bus flows.
- Additional bus lane is required at Waterloo Bridge.
- Need for better street layout to regulate traffic flow.
- Alternative routes as opposed to additional bus lanes could be a solution.
- Need to improve traffic flow and congestion at existing bus lanes, for example in Brixton, at the junction from Kennington Road to Baylis Road and from Kennington Road to Westminster Bridge.
- Impose taxes on taxi services to incentivise people to use public transport instead.
- Educate people to use the car less and public transport more.

- Prevent deliveries at peak time.

Many respondents stated that cycling and walking should be considered at the same time and that the prioritisation of buses should not have any impact on the safety or space allocation for these modes. One respondent argued that giving priority to bus lanes shouldn't increase car traffic. Bus driver training to minimise conflicts with cyclists and bad car driving behaviour were issues mentioned by two respondents. Another respondent stated that cyclists slow buses down.

Of the respondents who neither agreed nor disagreed, two respondents argued that buses should not be prioritised over cycling or walking and another two argued that additional bus lanes should be accompanied with additional cycling infrastructure too. Two respondents stated that some bus trips should be replaced by walking or cycling instead which would then relieve congestion.

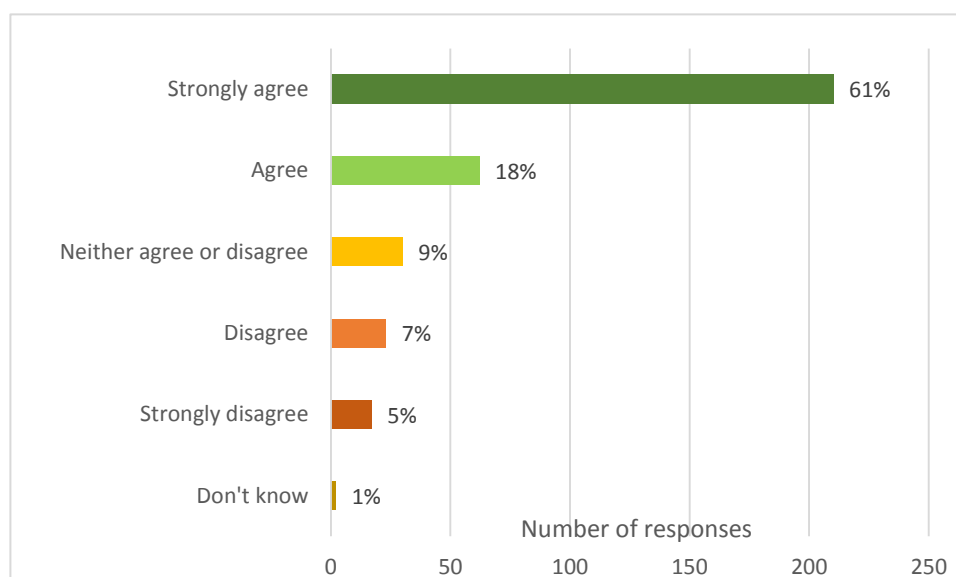
Seven respondents stated that there are already enough bus lanes and any additional would increase congestion. Two respondents suggested that bus services should be regulated instead by either more frequent service or fewer empty buses. Another individual suggested that some traffic could be diverted to alternative routes. Furthermore, an individual stated that buses cannot always cope with the demand and that additional public transport like tram services or extended tube lines is necessary in Brixton. In addition, a respondent argued that bus stops cause congestion.

Of the respondents who disagreed or strongly disagreed, some argued that cycling and walking should be prioritised over buses and encourage people to be more active. Six respondents suggested that buses add to congestion levels. Five respondents commented that there are enough bus lanes in the borough and priority has already been given to bus service. Three respondents stated that existing bus services should be regulated instead, making more efficient use of bus lanes and minimising empty buses. One respondent stated that public transport should be cheaper than car use whilst another suggested replacing buses on Streatham High Road by tube or tram instead. One individual stressed the choice of freedom in driving a car

7. We should consider measures to reduce overall traffic levels and, in particular, seek to protect local streets from 'rat running' traffic. To what extent do you agree or disagree with this statement?

Survey responses

The majority of 344 respondents strongly agreed or agreed that measures should be considered to reduce overall traffic levels and to protect local streets from 'rat running' traffic (79%). 9% neither agreed nor disagreed and 12% disagreed or strongly disagreed. The remaining 1% did not know.



Of the respondents who strongly agreed or agreed many argued that such measures will reduce traffic volume and speeds at residential streets providing a more safe and pleasant environment for children, pedestrians and cyclists. One respondent referred to New Park Road as a good example of that. Respondents frequently mentioned that car traffic passing through local streets is dangerous, increase levels of air pollution and noise and that drivers tend to drive aggressively with increased speeds.

It was stated that 'rat running traffic' causes problems to several local streets including Salford Road and Telford Avenue area, Chapel Road, Handforth Road, Crewdson Road, Rattray Road, Estreham Road, Tyers Street, Woodbourne Avenue, Natal Road, Denmark Road, Padfield Road, Fontaine Road, Dumbarton Road, Lyham Road and Valley Road.

Respondents suggested the following measures:

- Converting local streets into one-way streets.
- Better enforcement of speed limits.
- Two respondents suggested that only residents and visitors should be allowed to drive in local streets whilst another suggested that access should only be given to buses and delivery service vehicles.
- Two respondents suggested that only cyclists and pedestrians should be able to use local streets.
- Big vehicles should be prohibited.
- Bollards and speed bumps should be installed.

An extended congestion charge zone was suggested by two respondents. Another two proposed a borough wide CPZ and an individual suggested a CPZ in Streatham. Two respondents argued that car parking should be provided for free to residents or that parking should be only allowed for residents.

Some respondents were concerned that restricting traffic to local streets might increase traffic to main roads and that traffic might be simply displaced. Two respondents argued that car use should be discouraged overall and another two that traffic calming measures should be applied reducing overall traffic levels. A respondent specified that traffic calming measures should be applied around Loughborough Junction and Myatts Fields. Another one argued that a viable alternative to car use should be provided at the same time and that main routes should be friendly to drivers.

One respondent argued that residential streets should belong to people and not cars and that children should be able to walk, cycle and scoot to school safely. Another respondent argued that car use should be restricted for school journeys and that walking, scooting, cycling and public transport should be promoted instead. One respondent suggested dedicated school buses.

Of the respondents who neither agreed nor disagreed or didn't know, five argued that overall traffic and car use should be reduced by providing attractive alternatives to car use. Two respondents pointed out that consequences of such measures should be carefully considered since traffic on main roads may increase. One respondent suggested enforcing speed limits instead whilst another suggested the provision of free car parking.

Eight respondents who strongly disagreed or disagreed argued that restricting traffic in local streets would move traffic in main roads leading to additional congestion and air pollution. Seven respondents argued that roads should be used by everyone and that traffic should be allowed in every street to keep traffic flow smooth. Another three argued that local streets provide alternative and shorter routes. Two respondents stated that local streets should be free in order to enable free movement of emergency vehicles. An individual argued that a similar project around Loughborough Junction was not successful whilst another argued that 'rat running' traffic is not a problem.

The following suggestions were made:

- Viable alternatives to car use, with a better public transport service.
- Improved traffic conditions on main roads.
- Regulate traffic lights and minimise waiting times.
- Impose speed limits.

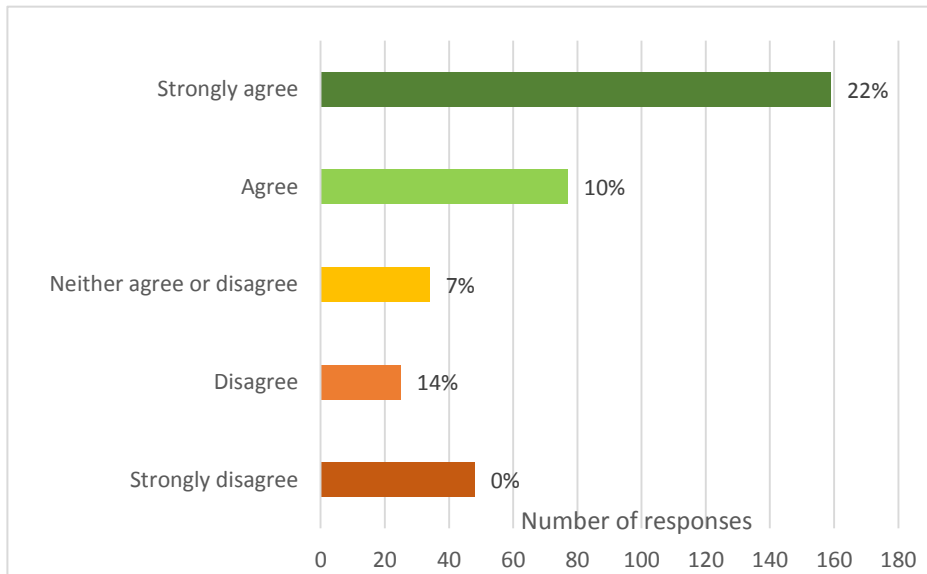
Statutory consultees

TfL Commercial Development agreed with considering measures to reduce overall traffic levels and stated that it will seek to include such measures within schemes on its sites within the borough.

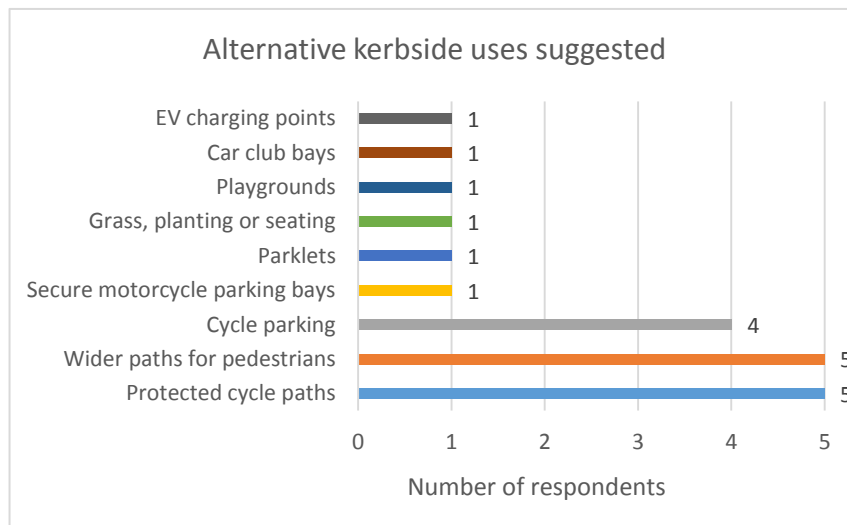
8. We should use parking controls to manage demand for parking, prioritising the needs of residents and protecting essential access. To what extent do you agree or disagree with this statement?

Survey responses

A total of 344 participants responded to this question. 88% strongly agreed or agreed that parking controls should be used to manage demand for parking, prioritising the needs of residents and protecting essential access. 10% neither agreed nor disagreed. 21% of respondents strongly disagreed or disagreed.



Of the respondents who either agreed or strongly agreed, many argued that parking spaces should be reduced to offer road spaces to other uses that would benefit the public. A range of alternative uses were suggested, with the most popular being protected cycle routes and wider pavements for pedestrians. Respondents argued that on-street parking creates more congestion and dangerous roads. It was felt that developments should be required to provide off-street parking, including cycle parking. Three respondents argued that there is a need to discourage car use whilst two respondents argued that car parking is a privilege and not a right. Two respondents stated that the needs of all should be accounted for and not only those who own a car. However, two respondents argued that car parking spaces for disabled residents should be secured.



Respondents identified areas that were seen to be busy in terms of available car parking spaces:

- Three respondents suggested a CPZ in Streatham especially around stations.
- A CPZ was suggested for Telford Park whereas Streatham High Road, Angles Road and Babington Road were referred to as very busy in terms of available parking spaces.
- Parking issues were highlighted in Railton Road where cars are being parked in double rows.
- Better enforcement of violations in residential areas like Southbank are needed.
- Park and ride commuters in Streatham Hill area create high demand for car parking which is not available during the day. The control of commuter parking around stations is needed.

Two respondents argued that there is a need for a borough wide CPZ whilst two other respondents suggested the introduction of short-stay parking zones to allow for shopping, socialising and carrying out business locally. One individual stated that traffic calming measures should be introduced.

Many respondents argued that parking charges should increase and argued:

- Car parking should not be free because it encourages car ownership and use.
- Diesel vehicles or households with a second car should be charged more.
- Visitors should be charged more than residents. Two respondents suggested that car parking should be free for residents.
- Car parking permits should be prohibited for residents of car-free developments.

Of the respondents who neither agreed or disagreed or said they did not know, three respondents argued that car parking should be allowed for shopping in the local area supporting local businesses. Two respondents stated that the focus should be on parking conditions around stations, minimising those who park and ride the tube. One respondent suggested changing parking times, for example at Brockwell Park, would reduce the amount of commuters parking around stations. Two respondents argued that there is a lack of enforcement of illegal parking in local areas.

Two respondents argued that residents should decide on parking control measures according to the needs and demand of different areas. One respondent suggested there is a need to focus on South Lambeth and specifically on Albert Carr Gardens, Streatham Hill Estate and Valley Road Estate that suffer from parking stress. Another individual suggested that underground or multi-storey car parks can reduce the amount of cars parked on street and an appropriate rate for residents should be then applied which might be different from the one for visitors. One respondent suggested providing one free car parking permit for each household paying council tax or a small reduction in the council tax for those not having a vehicle.

Four respondents argued that car ownership and car parking should be discouraged except for the disabled. One respondent argued that public transport, taxis and car club services can cover transport demand. However, one respondent argued that parking control measures will not necessarily reduce traffic while another one stated that no further controls are necessary.

Of the respondents who disagreed or strongly disagreed, four respondents argued that car parking should be free for residents. Four respondents suggested that visitors should be able to park for free. Seven respondents argued that the needs of tradesmen, businesses and local shops should be considered and that parking restrictions discourages shopping. An individual pointed out Streatham High Road as an area with potential negative impacts of parking controls. Four comments referred to the necessity of car parking for specific activities such as visits to health centres, post offices or when driving kids at school.

Five respondents stressed the need to account for low income families in case new charges apply as a result of parking restrictions. Another two argued that residents already pay council tax and shouldn't pay extra for parking a car. Seven respondents argued that there shouldn't be any control parking zones or restrictions, out of which five stated that Streatham should remain a free car parking area. Another two respondents stated that car parking should not be charged at all. An individual argued that a permit does not guarantee that a car parking space will be available.

Two individuals suggested limiting the duration of restricted parking periods, for example 30 minutes or 1 to 2 hours, referring to Weir Road in Balham being a successful example. It was stated that bike hangars are a good method to restrict parking supply. An individual argued that demand for disabled car parking spaces should be better regulated whilst another respondent argued that parking controls could limit access to car-sharing services. One respondent argued that parking controls should not be at the expense of those who cycle, walk or use car-sharing schemes whilst another argued that improvements to public transport should be implemented instead.

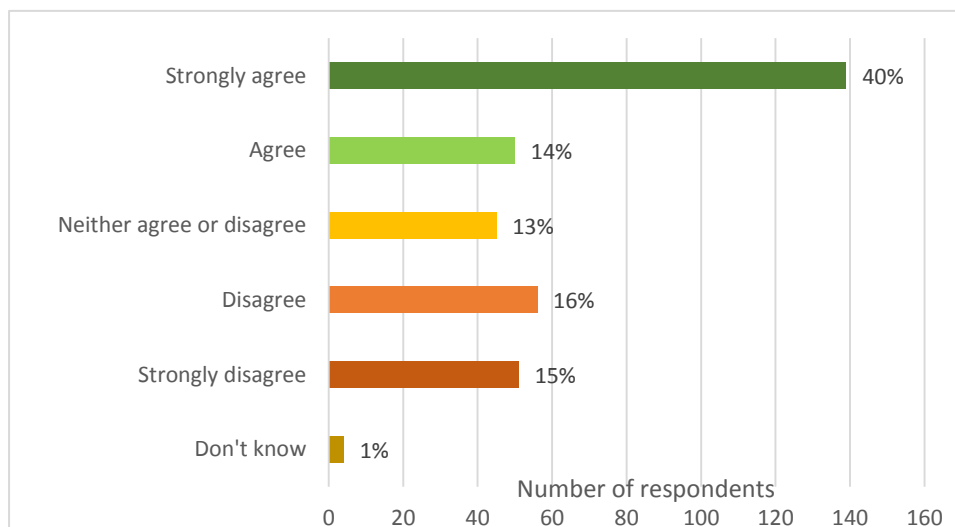
Statutory consultees

TfL Commercial Development set out that it will incorporate minimal car parking within schemes on its sites in accordance with the Draft London Plan (Policy T6) and the 'healthy streets' agenda.

9. New development in the borough should be car free except for disabled parking. To what extent do you agree or disagree with this statement?

Survey responses

A total of 345 participants responded to this question and just over half of respondents strongly agreed or agreed that new development in the borough should be car free except for disabled parking. 13% neither agreed nor disagreed and 31% strongly disagreed or disagreed.



Of the respondents who agreed or strongly agreed, 14 respondents argued that car free developments discourage car ownership and use and that there is not enough space to accommodate car parking on streets whereas the shift to alternative modes can reduce air pollution. Nine respondents stated that this measure should be accompanied with the provision of viable alternatives such as adequate cycle storage, cycle parking, car clubs or other car sharing schemes. In addition, four respondents argued that this measure should be supported by reliable, fast and accessible public transport and should be encouraged in areas with good PTAL.

Four respondents mentioned that car trips are necessary for families with children, shopping or visits to surgeries and that car parking should be considered for such cases. It was suggested that:

- Car parking should be prioritised for residents.
- Residents of car-free developments should not be allowed to have a car parking permit.
- Car owners should be charged the respective value of land occupied by a parked car.
- There should be less developments overall.
- The use of disabled parking permits should be monitored.

Of the respondents who neither agreed or disagreed or didn't know, five respondents argued that some people need a car including workers and families with children. A respondent suggested the creation of a new parking category addressed to families with children. It was suggested that car free developments need to consider factors such as PTAL or whether the development is within a CPZ area. Two respondents pointed out that there should then be a fair allocation of on-street parking among existing and new residents while another stated that the allocation of spaces to blue badge holders should be better monitored. Another two individuals argued that this measure should be supported by car-sharing schemes.

It was suggested that car parking should be underground and secure bike parking should also be provided. Respondents suggested that usage should be discouraged by increasing the cost of using and parking a car. Some respondents felt that the proposal is unrealistic and felt that the parking from visitors coming from outside of the borough was more of an important issue.

Of the respondents who disagreed or strongly disagreed, 20 argued that people need cars, especially families with children, elderly people and that car trips are necessary for work or shopping activities. Three respondents argued that the measure will not have the same effect across the population and that it will not be beneficial for everyone, with three respondents arguing that it will discourage young professionals and new businesses. Seven respondents argued that new developments should always provide adequate parking spaces and four argued that this measure should not be applied until improvements to public transport are implemented. Three argued it depends on the specific needs of an area and the level of access or quality of public transport.

It was suggested that whilst residents may own cars, they commute to work by public transport. It was also argued that people cannot solely rely on public transport and it is expensive to travel by train. Four respondents argued that car ownership is a personal right of choice, with two respondents arguing that car owners should not be punished given the lack of efficient public transport service in the borough, particularly as those who own cars pay tax for using the roads. Four respondents argued that the proposal was unrealistic.

Nine respondents argued that car free developments will have an impact on surrounding areas, increasing the stress of parking demand while reducing the availability for existing residents. An individual stated that restricting parking will not have a significant impact on reducing congestion given the small proportion of new developments. A respondent mentioned the upcoming electric vehicles whereas another one stated that new developments should be encouraged to set up electric car pools discouraging car ownership. An individual argued that new development should be discouraged overall.

A respondent suggested to invest more on enforcement or eco-friendly cars instead. Another one that car manufacturers should be penalised instead of car users. An individual stated that this measure should be supported with appropriate pricing, traffic calming measures, provision of public transport and better options for cyclists and pedestrians.

Statutory consultees

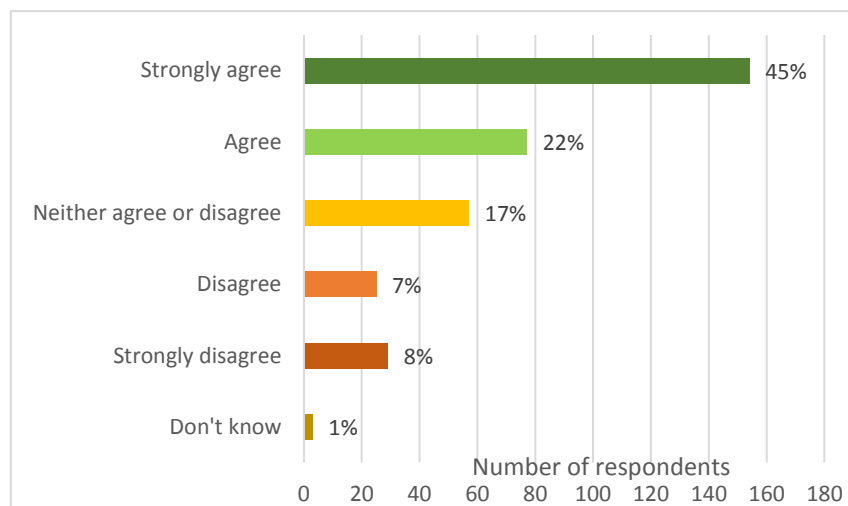
TfL Borough Planning supported the intention to deliver growth within good public transport access locations and the proposals for all developments within the borough to be car free with the exception of blue badge parking, which is in line with the Draft London Plan 2017. This will also help to reduce congestion and traffic levels along with the use of parking restrictions, as stated in the Transport Survey.

TfL Commercial Development stated this approach would accord with the Draft London Plan.

10. We should prioritise alternative uses of the kerbside such as car club bays, cycle parking and electric vehicle (EV) charging points on our streets, in response to user demand. To what extent do you agree or disagree with this statement?

Survey responses

A total of 345 participants responded to this question. 67% of respondents strongly agreed or agreed that alternative uses of the kerbside should be prioritised. 17% neither agreed nor disagreed and 15% strongly disagreed or disagreed. The remaining 1% did not know.

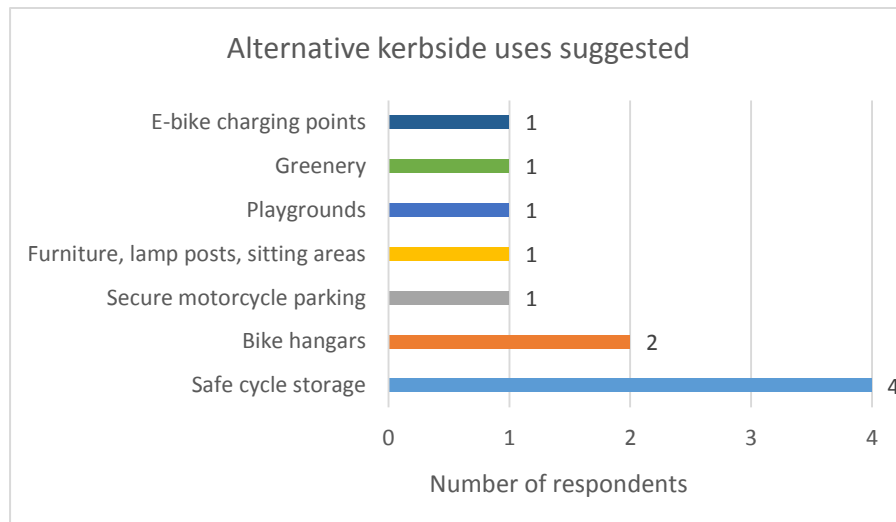


Of the respondents who strongly agreed or agreed, many stated that the suggested uses are more efficient in terms of road space utilisation. It was suggested that the approach can reduce car ownership and promotes more attractive neighbourhoods with reduced levels of local air pollution. It was commonly stated that alternatives to private cars should be encouraged.

Twelve respondents stated that cycle parking or car club bays should be prioritised whereas another two that more EV charging points are required. In addition, three respondents argued that there is a need to extend cycle hire scheme across the borough and another two that more sharing options and car club companies should be available to users. An individual suggested to introduce an electric cycle hire scheme.

Seven respondents argued that this approach should be introduced proactively rather than according to demand and that the borough should lead change and define the desirable outcome. It was stated that additional promotion of such schemes is required together with education and training activities.

Many respondents suggested additional uses to kerbsides as illustrated in the graph below.



Seven respondents were not in favour of electric vehicles and argued that they still add to congestion levels and road space usage increasing parking demand. An individual argued that electric vehicle charging points should not take space from pavements. Two respondents agreed with the initiative as long as it is not on the expense of active travel taking space from cycling and walking paths. An individual pointed out that off street parking space may constraint such measures.

Three respondents stated that the process of getting a cycle hangar permit from the council is a lengthy and inefficient process while another one stated that cycle hangars attract fly tipping. Three respondents argued that car parking should be secured at the same time which is useful for shopping and access to businesses.

Of the respondents who neither agreed nor disagreed, three respondents argued that electric vehicles should be discouraged since they still add to congestion, road danger, pollution and road space usage. An individual stated that owners of EVs should also pay for parking or charging their vehicles. Three respondents felt that the provision of such uses should be planned according to demand, with three respondents questioning whether the current demand justifies such initiatives.

Two respondents argued that measures should not be implemented on the expense of pavements and pedestrians. Another individual supported the initiative as long as parking is provided for short term access to shops and businesses whilst another argued that there should be a fair charging system for those parking at the kerbside. It was also suggested that the focus should be on making the borough attractive to cyclists and car clubs should be encouraged as the bays are not located on-street.

Of the respondents who disagreed or strongly disagreed, eight argued that such measures will reduce the amount of available car parking spaces for residents, adding to the existing lack of parking. Five respondents questioned whether there is a need for such alternative uses at the kerbsides and stressed that demand should be well considered first. Some respondents argued that these uses will serve the minority of the population and that car parking spaces should get a respective attention compared to the people using them. In addition, two respondents were against EVs stating that they are expensive and still add to traffic. Another two respondents said that priority should be given to safe walking paths and cycling. An individual stated that there is not enough space for additional uses.

11. Do you have any other comments?

A total of 65 respondents provided general comments related to transport and can be summarised as the following:

- The council's proposed measures can have great benefits to residents, including health benefits and the council should be decisive and confident when implementing changes.
- More stakeholders should be involved in the consultation process to ensure that the proposed measures are fair and allow residents to provide feedback before decisions are made.
- Suggested policies and schemes need to be delivered and monitored.
- Crossrail 2 should be supported.
- Lambeth should collaborate with Southwark to develop the Low Line and improvements in the rail services.
- CPZs should not be implemented in Streatham.
- A borough-wide CPZ should be implemented.
- Parking control measures push the problem into other areas, are not affordable for many residents and discourages businesses.
- Car parking should be better regulated by allowing, for example, parking on one side of the road.
- Control parking zones should be operating in weekends too.
- Each household should have a permit for only one car.
- Additional motorcycle parking or free use of parking bays should be allowed.
- Car parking charging schemes should be restructured based on a more innovative and fair logic.
- The cost of using and parking a car should be increased.
- Walking and cycling conditions should be improved and quiet and safe streets should be available to local residents, improving health and quality of life in the city.
- Road space should be better and more fairly allocated among motorists, cyclists, pedestrians and buses.
- Wider pavements and more pedestrian crossings are required including additional time to cross.
- Safer and segregated cycle lanes should be provided.
- The cycle Quietway northbound along Vauxhall Walk has introduced conflicts between cars and bikes.
- Abbeville Road is not appropriate for cycling in terms of design.
- Improvement works for pedestrians in West Norwood had an impact on the safety of cyclists.
- Additional secure cycle parking like hangars should be provided including in Holmewood gardens area.
- The application process for cycle parking permits should be improved.
- The Try Before You Bike and Cycle Training schemes should be promoted along with safe cycling infrastructure.
- Cycle hire schemes should be expanded to Brixton, Streatham and West Norwood.
- Air quality around Corpus Christi Primary School should be improved.
- Speed limits and illegal driving should be enforced.
- Speed limits signs in Kingswood Road should be improved.
- The pedestrian crossing in Stamford Street is often violated by drivers.
- There is a need for safer roads in Streatham as there are many accidents in areas like Natal Road.
- Traffic calming measures should be considered in residential streets to increase safety.
- Better traffic light management should be implemented and bus stops should be removed from the main carriageway.
- How people travel is a personal choice.
- Commercial and hire vehicles should be better managed as they contribute to congestion levels.
- Car use should be discouraged for trips to and from school.
- Car free days should be introduced, for example in Chapel Road and Knights Hill once a week.
- Electric vehicles should be encouraged.
- Buses should be supplemented by trams along main roads such as Brixton Road, Clapham Road and Acre Lane.

- Streatham should be better served by public transport mainly by buses in east-west and better frequency and integration of rail services.

Written responses

One respondent argued that the Local Plan needs to be explicit that Lambeth is a low car ownership borough so that road space needs to be re-allocated to the majority of the population that use public transport, walk or cycle. The respondent also suggested:

- Car parking needs to be sacrificed to bus lanes, wider pavements and cycle lanes.
- More streets need to be controlled to prevent rat-running.
- The 20mph speed limits need to be enforced, rather than ignored.

SP Planning, on behalf of Lexadon Properties Ltd, noted that providing 2 cycle spaces per flat in a convenient, accessible and secure ground floor location can be challenging and precludes other amenity uses and active street frontage. They requested that the Local Plan recognises that there is a range of space-saving double level cycle-storage solutions that would satisfy the aims of Policy S13.

The Brixton Society argued that transport station and bus capacity need to support the cumulative impact of high density development that fall within their catchment. They supported the long term objective of reducing car use but were sceptical of proposed measures to bring this about, including car free developments or closing roads of through traffic in the Brixton area. They felt that pedestrians are currently the lowest priority although facilities for cyclists are starting to improve. They suggested the re-opening of Brixton East station to give access to Overground train services.

Statutory consultees

Transport for London Borough Planning supports Lambeth's proposals to revise the Local Plan to reflect changes to national planning policy, the full review of the London Plan and changes to the borough. The council's aspirations to set out robust planning policies to delivery inclusive growth, reduce inequality and promote strong and sustainable communities is welcomed. Whilst the transport survey is obviously key for TfL, it is also essential that the existing and future public transport networks, accessibility, connectivity and sustainable travel are considered throughout the growth and development of the borough. It is important that the borough's growth aspirations incorporate Mayoral policy objectives and reflect Healthy Street principles in lin with the Draft London Plan 2017 and policies are developed within Lambeth's Local Plan to reflect this.

Highways England and the Office for Rail and Road reviewed the plan but had no comments.

Network Rail commented that the financing of railway infrastructure is vital, and whilst Network Rail is funded to provide all the necessary maintenance and improvements to its infrastructure, it is not funded to carry out enhancements and developments over and above what is required for the safe and efficient operation of the railway. Network Rail argued it is necessary to seek alternative funding sources and for the council to invest revenue from the planning system to improve London's railway. They would welcome the commitment in the new Lambeth Plan to support the Mayor's transport priorities and seek third party funding contributions to the railway. The intensification of development around stations must fund both mitigation and enhancement of the stations and supporting infrastructure.

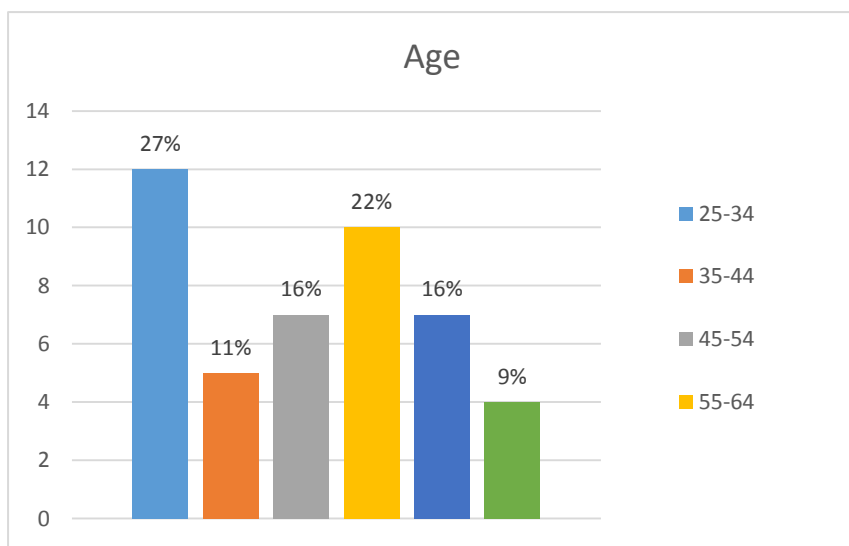
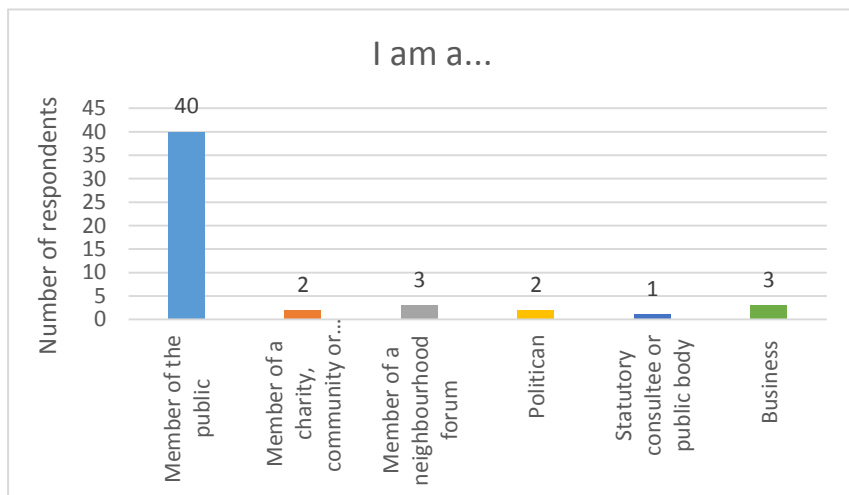
The Plan should also specifically acknowledge the vital role played by Network Rail in increasing the capacity of London's railway and, particularly, re-developing many of its major stations to meet the needs of a growing population. Network Rail therefore recommends that a specific commitment to support the comprehensive redevelopment of London's stations be included in the new Plan, as well as an acknowledgement that financial support through the planning charges regime and commercial development is required to facilitate these station improvements.

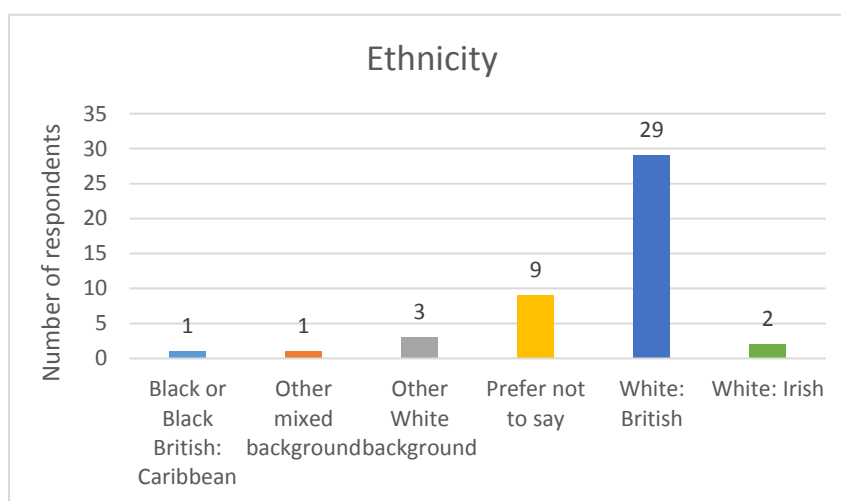
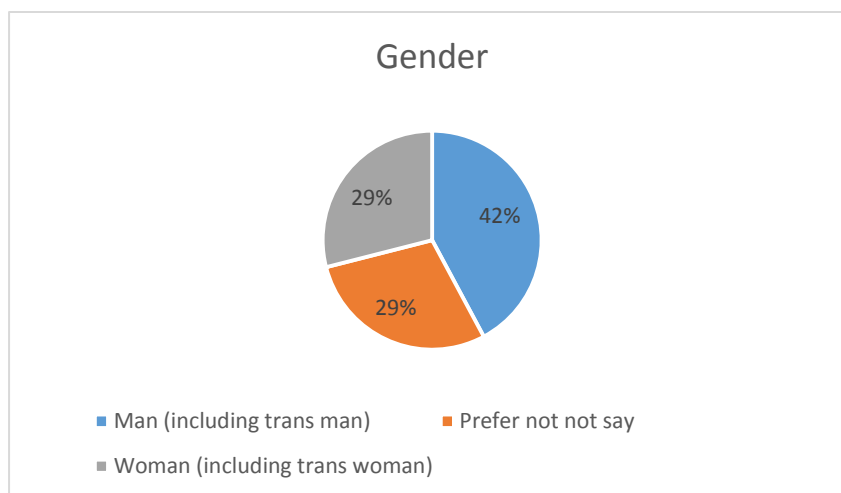
3.13. Waste

In response to the 'Waste' survey, 45 responses were received. A total of 10 written responses, including statutory consultees, was received.

Survey responses

- 40 survey respondents described themselves as members of the public. Two additionally described themselves as members of a charity, community or faith group, three described themselves as belonging to a neighbourhood forum, two were also politicians and three were also business owners. One respondent identified as a statutory consultee (the Environment Agency). It should be noted that some respondents identified as being from more than one category.
- The age group with the most respondents was 25-34, followed by 55-64.
- 42% of respondents identified as being a man and 29% identified as being a woman. The remaining 29% preferred not to say.
- 78% of respondents said they did not have a disability or live with anyone with a disability.
- The majority of respondents identified as being White British. Responses were also received from people identifying as being White: Irish, Other White background, Black or Black British: Caribbean and Other Mixed background.





1. Lambeth is part of the Western Riverside boroughs, which includes the boroughs of Hammersmith & Fulham, Kensington & Chelsea and Wandsworth. We believe the four boroughs can plan for managing waste more effectively together than they can as individual boroughs. What do you think about this approach?

Survey responses

37 respondents answered the question. The majority of respondents agreed with working collaboratively on waste and viewed it as cost-effective, with economies of scale available. Other respondents suggested that Lambeth could learn from other boroughs and that the approach could offer a greater range of options for recycling and waste management centres. One respondent argued that a London-wide approach would be even better and may result in a consistent recycling approach.

Some respondents suggested working with neighbouring Southwark in addition to the Western Riverside authorities and suggested this would reduce pollution on the roads if the eastern half of the borough could access Southwark's facilities.

There was resistance by some respondents to the idea of Lambeth managing waste arising in other boroughs. Other respondents suggested that the ability for a tailored approach or local solutions reduces over a wider area and there may be a problem with co-operation and co-ordination.

Written responses

The Brixton Society supported joint working with other boroughs, but noted potential political differences.

Suez R & R supported joint working and noted that this approach is also supported by the London Plan and the NPPF. The company recognised the challenges faced by boroughs in planning for apportioned waste targets. The operator argued that operators will site their facilities where land is available at a suitable price and where the market dictates which are largely out of the control of local authorities. Suez R & R argued that working collaboratively will provide a greater opportunity to achieve the requirements of the London Plan and will provide greater flexibility.

Statutory consultees

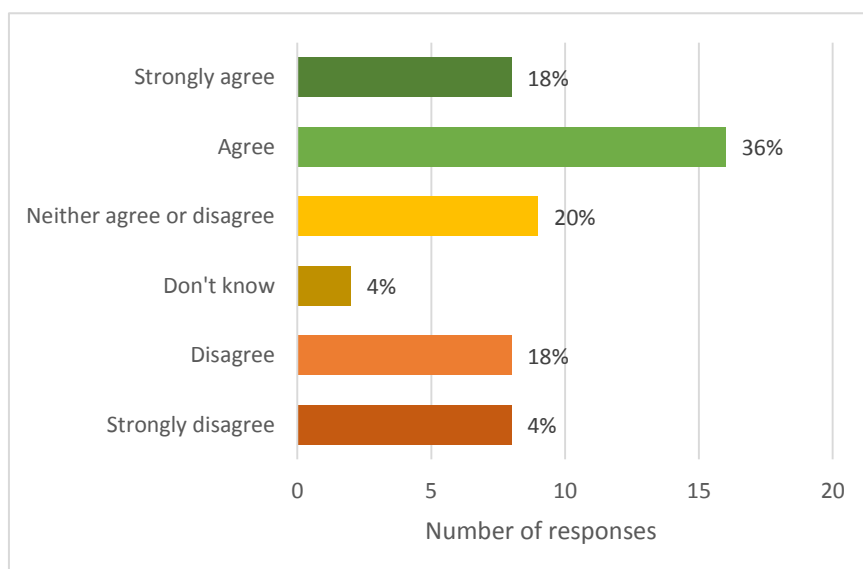
Comments were received from the Western Riverside waste planning authorities (WPAs) of Hammersmith & Fulham, Kensington & Chelsea, Wandsworth and Old Oak and Park Royal Development Corporation. All the WPAs noted the joint working on waste to date and committed to future co-operation on waste planning.

The City of London commented that any re-provision of waste sites outside Lambeth would need to be agreed through a pooling of the relevant London Plan waste apportionment targets so that London can meet its net-self-sufficiency target.

2. Currently the Local Plan policy requires developers who want to redevelop a waste site to find a replacement site within the borough of Lambeth. This can cause difficulties for waste operators who want to change how they work London-wide and may wish to leave Lambeth altogether. If we were to allow replacement waste sites to be outside Lambeth we would need assurance from the Mayor of London that Lambeth would not be penalised against its target. Replacement waste sites should sometimes be allowed outside Lambeth, if the replacement is elsewhere in London and we can secure the right guarantees from the Mayor of London. To what extent do you agree or disagree with this approach?

Survey responses

45 respondents answered this question. Just over half of respondents agreed or strongly agreed with the approach. 22% of respondents strongly disagreed or disagreed whilst 20% said they neither agreed nor disagreed.



Of the respondents who agreed or strongly agreed, some respondents noted that that these types of facilities are often better located in an area of low population which can be screened or enhanced by planning and Lambeth is already very densely populated. Other respondents suggested that the approach made sense and that London boroughs should co-operate with each other but waste should not have to travel significant distances, adding to pollution. One respondent argued that a waste site should not be allowed to be more than a mile from the borough boundary.

Of the respondents who disagreed or strongly disagreed, most of the respondents felt that Lambeth should take responsibility for their own waste and did not want to travel further to access household Reuse and Recycling Centres. Respondents were also concerned that if waste capacity was re-provided outside the borough it would lead to a greater carbon footprint and congestion. One respondent felt that local waste sites are needed for a circular economy whilst another questioned how the council would ensure that waste sites outside of the borough are appropriately managed.

The Environment Agency said they would agree with the approach if it did not result in any loss of treatment capacity to London as a whole and it would be preferable for sites to remain within the Western Riverside Waste Disposal Authority on proximity grounds.

Written responses

Suez R & R strongly supported replacement capacity outside the borough and encouraged the maximum possible flexibility in any forthcoming policy. The company set out that the waste management industry requires flexibility to respond to market demands and changes in process/technology and if no suitable sites are available in the borough then policy constrains the effective and profitable operation of business. Collaborating with other boroughs would go some way to overcome this in some circumstances.

The Brixton Society considered equivalent replacement employment floorspace acceptable if a waste facility relocated outside the borough.

Statutory consultees

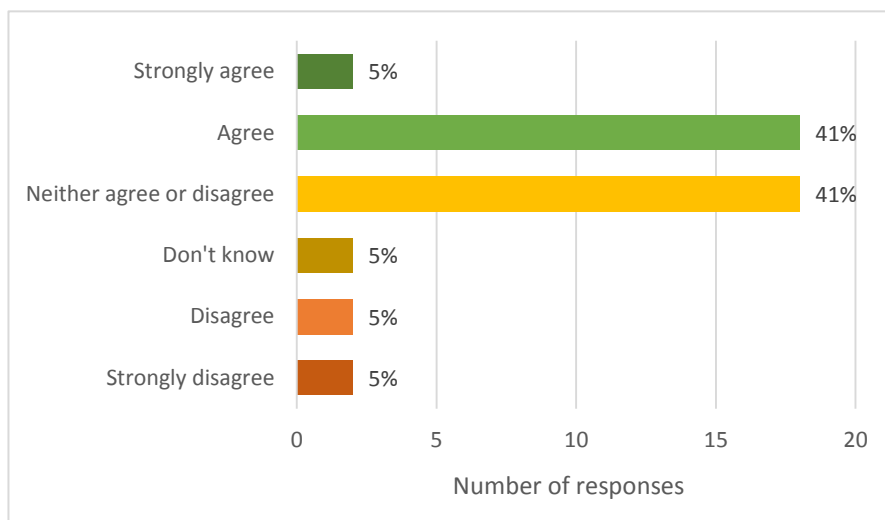
Old Oak and Park Royal Development Corporation suggested that, to support the delivery of Lambeth's apportionment targets, the approach to the relocation of sites should happen in a sequential manner, prioritising sites within the borough. A similar approach is being adopted by the OPDC.

Kensington and Chelsea also supported a sequential approach which prioritises replacement capacity within the borough, then the Western Riverside area, then wider London. They expressed concern that a loss of waste management capacity within Lambeth or the wider Western Riverside area could be detrimental to future joint working. Kensington & Chelsea further noted that if this approach was taken, Lambeth would need to secure reassurance from the GLA that Lambeth, and the other Western Riverside boroughs would not be penalised.

3. In the future we propose identifying broader areas for waste, such as KIBAs, rather than allocating specific sites because this is a more flexible way to meet future needs. To what extent do you agree or disagree with this proposal?

Survey responses

46% of respondents strongly agreed or agreed that broader areas for waste should be identified, rather than the allocation of specific sites. However, 41% of respondents said they neither agreed nor disagreed. 10% said they disagreed or strongly disagreed whilst the remaining 5% said they didn't know.



Of those respondents who strongly agreed or agreed, one respondent questioned whether it makes more sense to find sites outside of the London. Another respondents felt that current sites are very difficult to access without a vehicle and felt this contributed to fly-tipping.

One respondent who strongly disagreed, argued that KIBAs are only suitable for small-scale recycling facilities.

Four respondents who neither agreed nor disagreed wanted to know more about the impact on residents and stated that not enough information was provided. One respondent wanted to see an approach that limits vehicle movements whilst another wanted to ensure waste is managed locally.

Written responses

The Brixton Society supported this approach.

Suez R & R agreed with the assertion that broad areas such as KIBAs/Strategic Industrial Locations (SILs) generally provide the most appropriate locations for new waste facilities, in most circumstances. However, they argued that it is sensible to take a practical view of availability in these locations and consider whether existing facilities are likely to continue to contribute over the plan period and whether they should be safeguarded. They made the following comments:

- Industrial and employment units are often designed with raised loading bays, roof heights which are too low for loading waste and recycling vehicles and technology, and insufficient external storage space for recycled products.
- Competition for space on industrial estates is significant and this drives up prices to levels which are unviable for recycling, resource management and waste operations.
- KIBAs/SILs may provide the most appropriate locations in general terms, but any review needs to take account of these considerations when ensuring sufficient land / premises are available with the correct characteristics.

- Planning for waste collaboratively with the other WR Boroughs may provide some flexibility and in locational / viability issues.

Statutory consultees

Kensington & Chelsea supported the approach.

4. Do you have any other comments?

Survey responses

14 respondents provided general comments in relation to waste. These comments can be summarised into the following issues:

- Access to reuse and recycling facilities for residents without a car and the impact of this on fly-tipping should be reviewed.
- Finding ways to increase the range and rates of recycling, particularly the use of plastics and food waste collections.
- There should be more of a focus on business waste.
- Issues with communal bins and on-street bins.
- Policies should include design of new waste facilities.
- Design of new developments should take into account storage and collection of waste, including automated systems.
- Waste management plans should be required for new developments.
- Opportunities to connect to heat networks should be explored.

Written responses

In their written representation, Lexadon Properties commented that too much space was required for refuse and recycling storage which reduces the opportunities for an active street scene.

Suez R& R set out that WRWA Waste Technical Paper 2016 includes figures for the waste facilities within the area. Whilst Suez R&R accepts that National Planning Policy for Waste, paragraph 2, states that 'spurious precision should be avoided', operators should be given the opportunity to correct figures, where necessary. As an example, the 2012 data within the WRWA Waste Technical Paper 2016 suggests Brixton Waste Transfer Station had an 'Actual Input' of 23,850 whereas Suez R&R source weighbridge data suggests a much lower figure of 18,745. They argued this has a similar implication on the suggested 'Capacity Applicable to the London Apportionment'. It was noted that the WRWA Waste Technical Paper applies the 'Babtie Formula' reported in 'London Waste Apportionment Part A' (Jacobs Babtie 2006), which assumes that 1 hectare of land can deliver 80,000 TPA of waste management uses. They argued this takes no account of site constraints or other factors and cautioned against applying this on a uniform basis.

It was also requested that the Brixton Road Transfer Station is no longer allocated as a safeguarded waste site and is designated for residential development in accordance with the character of the surrounding land uses. Draft London Plan paragraph 9.9.2 highlights that waste site release can be progressed as part of a plan led process, where processing capacity is re-provided elsewhere in London.

The Brixton Society argued that the Local Plan should set out explicit waste and recycling storage standards for shops and businesses and not just residential uses. They stated that existing arrangements for shops and restaurants are primitive, unsightly and are unhygienic and there is no incentive to raise standards when premises are fitted out or refurbished. The Brixton Society also commented that there is a shortage of kerbside litter bins in Brixton Town Centre generally and there has been a reduction of kerbside recycling containers for different recycling streams, for example electrical equipment and used cooking oil.

Statutory consultees

The GLA commented that Lambeth should ensure it has enough safeguarded sites to meet its apportionment target in accordance with draft new London Plan Policy SI8 Waste capacity and net waste self-sufficiency.

The Environment Agency set out that waste is a strategic matter under Section 33A of the Planning and Compulsory Purchase Act 2004 and is referred to as one of the strategic priorities subject to the Duty to Cooperate. Effective planning for waste management needs to reflect the needs of neighbouring authorities or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams. Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste and resource management can also support economic growth and the creation of new jobs. Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact. Improved waste management can also contribute to reducing greenhouse gas emissions, including through the use of waste materials to generate renewable energy.

The Environment Agency set out that they would like to see the following outcomes:

- All new waste facilities should be enclosed on all sides and have a roof and fast-acting doors or provide equivalent environmental protection.
- Major new developments should be required to produce a detailed waste management plan detailing the waste types and tonnages projected, the targets for recycling and moving waste up the hierarchy and the anticipated end destination for materials.
- New developments should produce a detailed waste management strategy giving consideration to the waste collection system employed by Lambeth from domestic properties and incorporate storage for recycling receptacles and an indication of waste movements within the building or development.
- Opportunities for the collection of recyclables should be integrated where possible into public areas of new developments.
- Opportunities for the utilisation of heat networks and automatic collection of wastes should be investigated where appropriate for new developments.
- The design of flatted properties should take into consideration the recommendations from the research undertaken into the collection of waste from high-rise properties recently undertaken jointly by WRAP and LWARB.
- Waste storage areas should be designed to allow read access/egress by the vehicles employed by Lambeth and the typical vehicles employed by contractors where appropriate.

3.14. Places and Neighbourhoods

The majority of questions in the online surveys applied borough-wide. However, some questions were specific to certain parts of the borough. This included questions about the boundaries of Streatham town centre, hotels in Waterloo, student accommodation in Vauxhall and proposed town centre boundary changes.

The responses related to hotels in Waterloo, student accommodation in Vauxhall and proposed town centre boundary changes are summarised in sections 3.11, 3.5 and 3.10. This section summarises the other survey and written responses that were received for specific areas of Lambeth, including Streatham town centre. This includes the minutes of consultation sessions with designated or emerging neighbourhood planning forums and a summary of site-specific comments submitted by developers and landowners.

Waterloo

Survey responses

- One respondent argued the council should keep Lower Marsh as a local shopping street with small useful shops as well as niche shops with no more cafes or hotels. Lambeth has effectively lost Lambeth High Street already and there is a need to preserve the high street nature of local shopping streets instead.

Written responses

The WeAreWaterloo Business Improvement District (BID) set out key topics they would like to see reflected in new Local Plan which include:

- Reflection of the South Bank and Waterloo (SoWN) neighbourhood plan policies to make clear that the neighbourhood plan is a locally derived vision for the Waterloo area to be considered by planning officers and members of the planning committee.
- Transparent and ongoing local mechanisms which enable the community to have a say in the allocation, spend and delivery of local generated CIL and other financial obligations from relevant development schemes since it is local residents, owners and businesses who experience the impact on a day to day basis.
- Engagement with local job brokerage mechanisms such as Employ SE1 and the Waterloo Job shop to fulfil relevant Section 106 training and skills requirements.
- A balance between housing and other uses in Waterloo as the area is characterised by economic growth of vital importance to the future prosperity of the borough as a whole.
- Key sites and area-specific issues should be identified along with the preparation of a public realm strategy, which the BID would be keen to be involved with.
- Support for schemes which can demonstrate how intensification can serve to improve air quality, mixed and affordable office and retail provision, amenity space and well designed and maintained public realm.
- Development in Lower Marsh has the potential to threaten the livelihoods of traders who work in the market and the needs of these businesses and market infrastructure as a whole should be fully considered in relation to s106, CIL, development management, delivery and service planning and the ongoing operation of retail units.
- All traffic and construction management plans within the Waterloo area are assessed in consultation with the BID, in their capacity as the market operator to prevent any threats to the operation of the market.
- Consultation should take place on hostile vehicle mitigation and a timed closure of the street during market hours should be considered and consulted on.
- Support for temporary uses on empty sites or units to maintain the vitality of the area in the updated economic policies.

- Consideration to whether the balance of uses in the Central Activities Zone reflects the current demographic, shopping habits and increased demand for evening uses – successful high streets offer a mix of retail, services, culture, food and drink uses which helps to ensure neighbourhoods remain vibrant and economically viable in the long term.
- Infrastructure provision and maintenance, with a key focus on improvements to public realm infrastructure with pedestrians being a priority over pedestrians due to the nature of movement patterns in the area.
- A freight and waste consolidation scheme should be encouraged in new developments to reduce traffic.

Site specific comments

Site	Respondent	Summary of comments
St Thomas' Hospital	DAC Beachcroft on behalf of Guy and St Thomas' NHS Foundation Trust	Must emphasise the need to protect hospitals as they form a significant part of the infrastructure. Revised and emerging policies must protect the existing infrastructure and ensure that future extensions, refurbishments and regeneration of St Thomas' hospital (or any of the Trust's properties) is not stymied in any way. The needs of the hospital must be protected to meet the demands of the borough, London and beyond. This is particularly important given changing demographics (for example, the impact of the provision of services resulting from an ageing population). Consequently, it is important that the Trust is able to adapt and extent the hospital and properties held by it and other properties held by Guy and St Thomas' Charity. It is also important that other developments in the vicinity of St Thomas' hospital does not jeopardise in any way the operation of the hospital. The Trust has a commitment to providing community estates which aim to achieve a smaller number of better quality properties to deliver healthcare and wish to ensure that its objectives are not thwarted by amendments to the Plan.
Elizabeth House	DP9 on behalf of HB Reavis	HB Reavis is an integrated pan-European developer operating in the United Kingdom, Poland, the Czech Republic, Slovakia and Hungary. Their London development programme comprises four major schemes including the recently acquired Elizabeth House site at Waterloo. Planning permission was granted on the site in 2015 for a major office-led mixed-use development with accompanying enhancements to the surrounding public realm and works to alleviate capacity constraints at the adjoining Waterloo Station. Agree with securing supportive and affordable workspace in principle in order to support and grow existing businesses but would like to ensure that any policies to deliver affordable workspace are not overly prescriptive so that such workspace is provided in locations and forms that will genuinely meet a demand. The Local Plan should differentiate between strategic office sites which should generally prioritise larger floorplate traditional open-market commercial buildings, from other sites where the characteristics can better provide affordable workspace without compromising the nature and quality of the open market commercial offer.

		The characteristics of a site and development proposal should determine whether mitigation through the provision of affordable workspace is required, and if it is, what the best form of such mitigation is. Whilst the involvement of specialist affordable workspace providers is welcomed where such space is to be provided, this should be encouraged rather than required. Developers of commercial schemes should be allowed the flexibility to provide such space in a way that works alongside the open-market floorspace, and this may involve common management or some other form of bespoke solution. Requiring that all providers are chosen by the Council would be an unnecessary step where developers are willing to provide this accommodation. Both affordable housing and affordable workspace should only be sought where they are required to mitigate the impact of a development. They should be provided in a way that is proportionate to the impact of a development. The particular emphasis should be considered on a site-specific basis, which in some instances will favour affordable workspace over affordable housing where appropriate to the location or context of a development. In general, the recognition that a development can only support a certain amount of subsidy in order to remain viable is welcomed. If it is determined that mitigation in the form of affordable workspace is required by a development, and the nature and scale of that development means that providing the floorspace on-site could be detrimental to the development or the potential affordability and occupiers for that floorspace, then the potential for a financial contribution is welcomed where it would ensure the best outcome. Both on-site provision and financial contribution should be accounted for in the financial appraisal. Whilst there is a pressing need for housing in London and Lambeth, the Local Plan should recognise that single-use commercial schemes remain an important part of London's development pipeline and should be encouraged on certain strategic sites such as Elizabeth House without the need to provide housing. The delivery of high quality commercial led developments on sites such as this are vitally important to Lambeth's economy and ongoing regeneration, as well as to the delivery of key transport infrastructure and new jobs and growth. The Waterloo Opportunity Area provides a significant opportunity to develop a cluster of high quality commercial office buildings in one of London's most accessible locations, and in so doing deliver substantial benefits to Lambeth's economy. Encourage the land use policies for Waterloo within the Local Plan to support the provision of office-only schemes on certain key strategic sites, such as Elizabeth House, where this is appropriate. In relation to transport, there should be a priority for Waterloo, which should not be limited to capacity improvements, but should also include the provision of a station whose environment, accesses and connections are of a quality and functionality that are fit for purpose and appropriate for London's busiest train station. This is critical for economic growth not just in Lambeth, but also for Central London and the South.
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		Welcome an acknowledgement in the Local Plan that infrastructure funding is likely to become increasingly challenging, and that within a climate of other mounting viability pressures on development, clear priorities will need to be established in relation to each area and site so that development remains viable, and available resources are properly utilised.
Southbank Centre	Quod on behalf of the Southbank Centre	The South Bank is currently identified as a Strategic Cultural Area in the Lambeth Local Plan, with the objective of promoting, safeguarding and improving leisure, recreation, arts and cultural facilities in the borough. This objective, the current wording of Policy ED11 and its general premise is supported by the Southbank Centre. The comments strongly supported the principles of existing policy PN1, particularly promoting the expansion of arts and cultural activities throughout Waterloo and enhancing the South Bank in its role as an international cultural and leisure centre and a London tourist destination. Support was also given to policy ED11 and its role of safeguarding facilities, which is consistent with paragraph 70 of the National Planning Policy Framework. As the Southbank Centre submits a large number of planning applications for the installation of temporary exhibits, structures and advertisements, the inclusion of stronger policy support for temporary installations that diversify and support the arts and cultural provision would be welcomed by the Southbank Centre, particularly given the continued reduction in Arts Council Grant and the need for alternative funding sources.
BFI Southbank and IMAX cinema	GL Hearn on behalf of BFI Southbank and IMAX cinema	The Local Plan could go further to include positive proposals and policies aimed at securing opportunities for culture and creative industries within multi-use developments and as stand-alone projects. These policies would re-emphasise the contribution of this sector to Lambeth's economy and its role as a tourist destination and centre for local creative industries and attractions, as recognised by the new draft London Plan. The comments also set out that the new draft London Plan emphasises the need for boroughs to positively plan for culture and creative industries, which includes the designation of Creative Enterprise Zones, Cultural Quarters and the development of a Cultural Infrastructure Plan. This is supported by the BFI who commented that this approach would be a positive intervention in seeking to create opportunities for the development of this important sector and should be reflected in Lambeth Local Plan policies.
Waterloo Station	Network Rail	Waterloo Station is a key transport hub linking much of the south and south east of England with Central London. The station, which also includes Waterloo Underground Station, is the busiest by passenger numbers in the United Kingdom. Waterloo Station has recently undergone alterations as part of a desire to improve passenger facilities and amenities at the station. It is envisaged that further major works will be required in the future to address the operational needs of the network and the needs of the passengers. Network Rail requests that a flexible approach is set out to development at the station as it may be necessary to make significant changes to the station in order to deliver the much needed capacity and interchange improvements.

		Furthermore, Network Rail specifically requests that the new Plan acknowledges the need for Developers of sites near to Waterloo Station to contribute to both mitigation of any impacts as a result of their developments, but also to contribute to improvements to the station and interchange. This can be delivered through S106 Agreements and Community Infrastructure Levy, but must be supported by appropriate policy. For example, the development opportunity offered by Elizabeth House is significant, but it is essential that the development acknowledges its impact and relationship with the station and therefore must respond accordingly through mitigation works and financial contributions. It is hoped to continue discussions on the site with you and the new Developer in order to ensure that way issues are properly considered and addressed.
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Neighbourhood Forum consultation session

Lambeth Local Plan Review consultation session with SoWN Neighbourhood Forum
Build Studios, Waterloo 16/10/2017 15.30-17.00
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer) and Rheanne Holm (Neighbourhood Delivery Lead, Investment and Growth)
SoWN – Ben Stephenson
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017. The surveys do not ask specific questions about the Places and Neighbourhood chapter of the Local Plan. However, comments from designated and emerging neighbourhood planning forums on these sections of the Plan would be welcome at this stage. SoWN may also be particularly interested in the questions on air quality and hotels.
General comments SoWN offered praise on the surveys as all of the information needed to complete the surveys is available. They feel that there is nothing at this stage that conflicts with their own neighbourhood plan but feel that the hotels question is too leading. They advised that some people may have particular views on whether there are too many hotels in Waterloo. SoWN asked for a PDF version of the survey questions for members who are not able to get online. Council officers agreed to circulate a PDF of the survey questions.
Relationship with neighbourhood plan SoWN asked whether their neighbourhood plan has been used to inform the Local Plan Review. They advised that the neighbourhood plan represents the views of the neighbourhood forum and their responses to the Local Plan questions are represented in their neighbourhood plan policies. The neighbourhood forum may not put a separate response to the Local Plan but the steering groups may answer the relevant sections.

Council officers advised that the views of SoWN will be used to inform the Places and Neighbourhood chapter of the Local Plan in particular and that PN1 will include a reference to the emerging neighbourhood plan. Council officers also advised that when the Local Plan is adopted, the most up to date policy will be given greater weight and SoWN may want to be aware of the potential sequencing issue for their neighbourhood plan policies if a particular position in the Local Plan has changed.

Community Infrastructure Levy

SoWN asked how the CLIP process sits alongside this process and questioned how the council can develop a strategic Infrastructure Delivery Plan if they do not know what is to be spent at a strategic level and what is to be spent at a neighbourhood level. SoWN also advised that they would like the process of commenting on infrastructure priorities to be more transparent.

Council officers advised that there will be an opportunity to comment on the strategic projects when a draft Infrastructure Delivery Plan is published with the draft Local Plan next year and also set out the process for identifying projects for the Waterloo CLIP.

Viability

SoWN asked where financial viability and transparency fit into the Local Plan Review. Council officers advised that the council has recently adopted its Development Viability SPD, the principles of which may be taken forward into the Local Plan. The Mayor also published his Affordable Housing and Viability SPG in August which may be taken forward into the London Plan.

Transport for London

SoWN asked about the relationship between the Local Plan and the work that TfL can do, questioning who TfL are accountable to. Council officers explained the relationship between the council and TfL for the Waterloo works.

Brixton

Survey responses

- One respondent argued that the nightlife in Brixton is uncoordinated and uncontrolled. Late at night or early in the mornings there are noisy crowds of drunken young people being sick or urinating whilst road sweepers have to clean up mountains of bottles, cans and litter. Amplified buskers and noisy crowds is unbearable and older people without any form of photo ID are barred from going to any of the late night pubs and clubs in Brixton. The government voted against introducing an ID scheme so why does Lambeth require local bars to only admit people with photo ID as part of their licensing.
- It was also suggested that on Acre Lane and Coldharbour Lane there are opportunities to improve the quality and mix of the offering. These areas are currently fragmented but could increasingly could become a destination and take the pressure of Brixton town centre.

Written responses

40 responses were received in relation to a number of issues for Brixton. The responses set out the issues and the solutions they believed can be found through the Local Plan Review.

- Street urination is increasingly becoming an issue, particularly during the evenings and is encouraging more people to behave in an anti-social behaviour.
 - New toilets should be opened in areas where they are needed: Windrush Square, Popes Road and under the bridge.
 - New and existing licences should include sufficient toilet facilities.
 - Sunken urinals should work and be usable: urinals on Electric Avenue only work sporadically.
 - Consider temporary urinals and portaloos (from Friday pm to Monday am) in a similar way to Westminster council in Soho
- The council's system to report public nuisances does not work which means officers and councillors do not have the correct information to act and are in breach of their duty under the 1990 Environmental Protection Act.
 - The new Local Plan should develop a policy to address bringing back the noise abatement out of hours response service and to fix the reporting system so reports are properly cross-referenced and sent to the correct officers to investigate.
- The definition of Brixton town centre is out of date, which does not include key areas such as Brixton Village, Market Row, Coldharbour Lane and Pope's Road. These areas have much higher numbers of restaurants and bars than a residential area should have. New hotspots around Acre Lane and the Brixton Water Road end of Effra Road are emerging.
 - The definition of the town centre should be changed so that the 25% includes the Brixton Village, Market Row, Popes Road and Coldharbour Lane.
 - Any policy should allow for regular updates to the town centre boundary to reflect when things changes and to allow new areas to be added.
 - An urgent mechanism to prevent any further changes in use from A1 in Brixton is required to allow central Brixton to keep its shops and prevent any further A3/A4/A5 conversions.
- Only a very narrow group of residents are consulted over changes to planning use and what is considered 'amenity' is too narrow: people further down the road to the site are also affected by the noise, smells and waste but are not consulted.
 - The grounds for rejecting proposals should be increased, to include a broader definition of amenity and the people living in the surrounding streets, not just those living directly next to or over the proposed business.
 - The grounds for rejecting licensing applications are too narrow, which don't take account of issues such as anti-social behaviour, noise and waste.

- A 'saturation zone' should be created for central Brixton to freeze the number of bars and to give licensing authorities the basis to reject new ones.
 - All premises should be held to the same standards and terms, for example number of toilets and acoustic insulation.
 - Licensing conditions should require businesses to put up signs to highlight they are in a residential area.
 - Temporary partial barriers could be placed at key spots and managed by door staff: Electric Lane, Electric Avenue and the end of Rushcroft and Tunstall.
- Large numbers of people visit Brixton during the evening which can cause issues with noise. There are also buskers playing amplified music late at night who play for longer than previous buskers.
 - There should be strict enforcement on the ban on amplification after 9pm for buskers and street preachers.
 - Consultation should take place on a Public Space Protection Order.
 - Enforcement officers should work on anti-social behaviour and noise systematically and regularly at night and not just as an occasional event.
- Some bars and restaurants, particularly new venues, don't have enough bins for their waste which is then left on the streets. Some areas are not being cleaned properly by the council's contractors.
 - There should be enforcement of the rules for shops and bars to have sufficient waste storage space.
 - More waste bins for public use should be provided on streets that don't have them.
 - Veolia should be giving streets a proper late-night clean.
- There needs to be co-ordination between the council, the Metropolitan Police, Transport for London, the British Transport Police and local residents.
 - The Local Plan should commit to setting up a forum to co-ordinate the key players to address problems collectively and systematically.
 - A single Brixton Town Centre Safer Neighbourhoods panel should be re-established across the town centre and the three wards and should include the British Transport Police.
- Brixton Market is in a residential area and there have been changes in terms of timings, materials and waste management that impact on residents.
 - The waste management and street cleaning routines should be changed to accommodate residents.
 - The removal of tables and shop equipment at night should be enforced.
 - The waste contract for Electric Avenue should be managed more effectively.
 - Frames and poles should be replaced with a no-metal system (similar to Herne Hill) as the noise caused by metal poles is far higher than the noise caused by wooden market frames.
 - Pitch licence management should be enforced: set-up times, clean up, location of crates and trolleys.
 - Late night and early morning deliveries should be stopped.

Respondents also made the following suggestions to address issues in Brixton:

- Using wardens to direct people home and for litter picking.
- Installing toilets in the underground station as not all urination will be caused by people leaving the clubs and bars of Brixton.
- Enforcing staggered closing times.
- Increasing police presence to address drug use, prostitution and violence.
- More signage to warn against noise, litter and urination.
- Providing council properties with wheelie bins or fixed public bins instead of disposing of the waste on the street.
- Consider the impact of 24hr fast food restaurants on loitering, waste and noise.
- Consider who central Brixton should appeal to and not just for people who want to drink.

One respondent argued that many people who live in Electric Avenue and near to Pop Brixton are suffering health impacts due to noise pollution. They also commented that the number of bars, restaurants and pop ups are putting other forms of retail at risk and Brixton should still be a location where you can buy fresh vegetables, fabric or equipment for the home.

One respondent set out that Acre Lane has no traffic calming measures and vehicles can use it as a race track. There is also cars and bikes which double or triple parked, particularly on double yellow lines.

The Brixton Society expressed that there is widespread concern that Brixton's shopping frontages have been too diluted by unrestrained growth of A3, A4 and A5 uses and requested that these uses are limited to:

- Market Row & Brixton Village arcades: no more than 50%.
- Coldharbour Lane between Brixton Road and Atlantic Road: no more than 30%.
- The Town Centre/ BID area generally: no more than 25%

Site specific comments

Site	Respondent	Summary of comments
Brixton Town Centre	CBRE on behalf of Pagecolt Ltd	Pagecolt Ltd owns a key site within Brixton Town Centre which it is currently considering redeveloping to provide office uses with retail uses on ground floor level. The concept of the emerging London Plan is to promote 'good growth' within London, which is socially and economically inclusive. The emerging London Plan sets out six policies for achieving good growth within London. Policy GG5 relates specifically to growing a good economy, which aims to conserve and enhance London's global competitiveness through diversifying the economy and planning for sufficient employment and industrial space. GG2 sets out a policy framework for creating high-density, mixed-use places that make the best use of land. Options to proactively explore the potential to intensify the use of land to promote higher density development should be explored particularly on sites that are well-connected by public transport. This ambition to intensify development on sites should be taken forward in the Lambeth Local Plan and should be considered as part of the review. Policy ED1 of the emerging Local Plan sets out that increases in the current stock of offices should be supported where there is evidence of sustained demand for office-based employment. The current Lambeth Local Plan also promoted office development in sustainable locations. This element of the Plan is not being reviewed under the current Local Plan Review, therefore the existing policy is supported to ensure that there can continue to be sufficient employment floorspace to support Lambeth as a successful office location. Pagecolt Ltd supports providing higher density development in well- connected locations as this can optimise sites which are sustainable and make sure that brownfield sites are being used effectively. With regards to the provision of affordable workspace, this should be provided on sites where there is demand for such floorspace, and should be provided on a site by site basis based on the site's location and constraints, rather than a blanket approach to provision.

		A financial contribution should be considered where it can be demonstrated that it is not a feasible solution to provide the space on site or where the site is not located in an area with demand for small spaces, for example in areas outside of town centres, subject to viability. Development opportunities identified in specific area SPDs are also identified within the site-specific chapters of the Local Plan. This ensures that it is clear which sites are considered as suitable for redevelopment by the Council.
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West Norwood

Survey responses

One respondent requested that the Local Plan takes into account the need to develop West Norwood in a sustainable family-friendly and environmentally responsible way, with the following things considered:

- Knollys Road should be redeveloped with housing, workplaces and local amenities rather than a waste disposal site as an increased number of lorries and other large vehicles would be a huge disadvantage to Tulse Hill and West Norwood.
- Additional footbridges should be built between Knollys Road and Leigham Vale to better connect Tulse Hill and West Norwood families to local schools on foot.
- Pedestrians should be encouraged and heavy vehicles should be discouraged.
- Strict limits should be made on the number of fast food shops and betting shops in town centres.
- Better arrangements should be made to reduce litter and fly tipping.

Other comments can be summarised into the following issues:

- West Norwood town centre is bizarre, with three mini-supermarkets, with identical offerings, next to each other but a toy shop would be really useful.
- The area of Knight's Hill in West Norwood has directly suffered from past and current planning policy. The area has a number of illegal uses and is dominated by overspill parking from the bus garage. The potential of this area is immense as it is located in the heart of West Norwood, adjacent to the train and bus stations and could be easily developed into a vibrant part of the Town Centre if a sensible planning strategy was adopted. Employment uses could be increased whilst allowing a greater diversity of uses such as a street market, cultural buildings, retail, office and residential uses.

Neighbourhood Forum consultation session

Lambeth Local Plan Review consultation session with Norwood Planning Assembly
Phoenix House, Lambeth 19/10/2017 9-11am
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer), and Conor McDonagh (Delivery Lead, Investment and Growth) and Olga Di Gregorio (Delivery Support Officer, Regeneration)
Norwood Planning Assembly – Graham Pycock, Noshir Patel, Mark Fairhurst
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017. Responses received during the consultation will be made available in a consultation statement which will be published alongside the next round of public consultation. The surveys do not ask specific questions about the Places and Neighbourhood chapter of the Local Plan. However, comments from designated and emerging neighbourhood planning forums on these sections of the Plan would be welcome at this stage. The Local Plan Review timetable is set out on the Council's website. Council officers understand that it is likely that the new draft London Plan will be published on 29 November and consultation will last until late February. The

next round of public consultation on the Lambeth Local Plan Review in 2018 will take account of the content of the draft New London Plan, alongside feedback from the first round issues consultation and the evidence base.

All of the evidence available to date for the Lambeth Local Plan review has been published on-line and is available for neighbourhood planning groups to use.

A draft of the new NPPF is expected in the new year for consultation.

General points made by NPA

The NPA asked whether the council is currently meeting its housing targets. Council officers advised that the council is meeting its targets and evidence of this can be found on the [evidence base webpages](#) on the council's website (see the documents called Housing Delivery Strategy and Housing Development Pipeline).

NPA asked whether Lambeth's housing target has been distributed across Lambeth. Council officers advised that there are no 'sub-targets' in the Local Plan for different part of Lambeth, although the London Plan does set housing targets for Opportunity Areas.

NPA asked whether there will be a target for self-build housing. Council officers advised that the draft Local Plan is likely to include a policy on self-build/custom-build housing – this is a requirement set out by government.

Council officers advised that the Local Plan Review is a material planning consideration, but with very limited weight at this stage. It will gain more weight further into the process.

NPA advised that it may be difficult to get people in Norwood to engage in a borough-wide plan and asked for advice on how to encourage people to take part. Council officers advised that any borough wide policies in the Local Plan will affect Norwood and people may want to comment on Policy PN7 for West Norwood as well. An updated draft Local Plan policy for Norwood would be included for consultation in the draft Local Plan next year (2018). It was intended that the policies in this section of the Local Plan (the 'PN' policies) would also reflect the aspirations of existing and emerging neighbourhood planning forums where possible. Neighbourhood plans could then provide further detail to Local Plan policies at a local level.

NPA asked what the council's approach is to premises that are left empty and gave examples of the dairy site on Rosendale Road and some shops on Norwood Road. Council officers advised that this is not a role for planning policy and council officers from Investment and Growth advised that during the production of the Manual for Delivery, there had been attempts to engage with landlords asking why their shops remained empty. It could also become a role for the BID going forward.

Relationship with neighbourhood plan

NPA asked whether there will be any support from council officers in producing the NPA neighbourhood plan. NPA suggested that the Places and Neighbourhood sections of the local plan should fully align with the neighbourhood plan and that it does not make sense for policies to be drafted separately.

Council officers advised that the council will respond and given constructive advice on draft policies in neighbourhood plans. NPA is encouraged to keep the council informed of their timetable and to also send their draft documents for comment. Additional support is available from government grants and NPA can make use of the [local plan evidence base](#) which is available on the council's website. Council officers also advised that any comments received by NPA will be used to inform PN7 but it should be noted that the local plan and neighbourhood plans are two separate documents that are required to go through different processes.

NPA asked how many policies in the Local Plan are strategic as it would be helpful if they understood what is strategic and what is not so they know what to look at when preparing their neighbourhood plan. Council officers advised that the question of whether a Local Plan policy is strategic has to be considered in relation to the criteria set out in [National Planning Policy Guidance](#) (paragraph 74). When a neighbourhood forum provides their draft

neighbourhood plan, the council will provide an analysis of each proposed NP policy against conformity with strategic policies.

Business and Jobs

Council officers advised that the Business and Jobs survey looks at KIBAs and includes 3 new KIBAs, some boundary changes and some de-designations. NPA asked whether social workspace is something we are looking at. Council officers advised that affordable workspace is something that we are looking at through the Local Plan Review.

Council officers also advised that KIBAs are strategic policies and that the policy comes from the London Plan in order to maintain a strategic stock and supply of industrial land and that setting the boundaries for KIBAs is role for the local plan. Enforcement officers are also looking at D1 and church uses within the West Norwood Commercial Area KIBA.

NPA asked whether the KIBA could incorporate space for the Norwood market. Council officers advised a market would generally be considered to be more appropriate within the town centre rather than the KIBA. It was suggested that it may be beneficial to have a meeting where the NPA present different ideas for different uses and the council can then advise on the different designations and their implications.

NPA asked whether there were any plans for an Article 4 Direction in Norwood for B1a to C3. Council officers explained that the Article 4 Direction for office to residential that had already been implemented covered areas which are predominantly office based because the Article 4 Direction needed to be a targeted approach due to potential government intervention. The West Norwood KIBA is not predominantly office base but it may be possible in the future to re-look at the Article 4 Direction if the amount of office changes.

Town centres

NPA were advised that there is proposed change to the boundary of West Norwood district town centre which has been informed by the Manual for Delivery. This was included in the issues consultation for the Local Plan Review. It proposed de-designating part of the town centre south of the railway as it was considered that this is not functioning as part of the town centre. NPA were invited to comment on this proposed change when responding to the consultation.

NPA could also use their neighbourhood plan to look at how they want to manage the mix of uses within the town centre and may want to consider a policy for this. NPA advised that this part of the town centre is changing with developments coming forward so it might come back into use and are of the view that the area has failed due to lack of enforcement over conversions to residential.

Council officers from Investment and Growth advised that they would be considering a bid for the Good Growth Fund and that NPA should be involved in the process. NPA advised that they are having difficulty in engaging with the BID and would like the council's help in brokering this relationship. Council officers in Investment and Growth advised they will look to assist with this.

Site 18

NPA advised that they are receiving advice from AECOM on bringing forward a site allocation policy and questioned whether a draft policy in the neighbourhood plan for this site would be a material planning consideration. Council officers advised that any policy would only gain weight further into the process. Officers in Investment and Growth advised that they would speak to people looking at land assembly to let them know about NPA for future engagement.

Kennington/Oval

Written responses

One respondent commented that there are too many estate agents in Kennington, which is a critical junction in the north of the borough that has been allowed to 'descend into such a mess'.

Neighbourhood Forum consultation session

Lambeth Local Plan Review consultation session with KOV Neighbourhood Forum
Phoenix House, Lambeth 16/10/2017 9-11am
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer) and Joanna Sloman (Neighbourhood Delivery Lead, Investment and Growth)
KOV Forum – Marilyn Evers, David Boardman, Helen Monger, Michael Keane
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017. The surveys do not ask specific questions about the Places and Neighbourhood chapter of the Local Plan. However, comments from designated and emerging neighbourhood planning forums on these sections of the Plan would be welcome at this stage.
General points made by KOV Forum KOV Forum advised that as the comments they can provide at Proposed Submission stage can only comment on whether the Plan is sound, the council may receive comments from the Forum saying the Plan is unsound. KOV Forum are disappointed in the quality of the current Local Plan Policies Map and that there is confusion over the colouring of some elements of the Policies Map. In order to be compliant with the National Planning Policy Framework (NPPF), the Local Plan should be clearer on what is strategic and what it is not which would make it easier for neighbourhood plans to identify the strategic policies. KOV Forum are likely to raise this again during the consultation. KOV Forum consider there is bias against inner London Boroughs due to the focus on the density matrix in the SHLAA process – inner London Boroughs have a third of the population growth but half of the new housing. There is a reliance on the density matrix when producing the SHLAA but it is not followed when it is applied to planning applications. KOV Forum advised that the things that matter to local people are very detailed at a local level and ask whether these things can be included in the Local Plan Review. Council officers advised that KOV Forum are welcome to suggest things to be included in the Local Plan Review as part of the consultation and these will be considered, although some level of detail may be more appropriate for a neighbourhood plan.

Local Plan Review timetable

The Local Plan Review timetable is set out on the Council's website.

Council officers understand that it is likely that the new draft London Plan will be published on 29 November and consultation will last until late February. The next round of public consultation on the Lambeth Local Plan Review in 2018 will take account of the content of the draft New London Plan, alongside feedback from the first round issues consultation.

A draft of the new NPPF is expected in the new year for consultation.

KOV Forum asked whether the life of the Local Plan will be extended. Council officers advised the plan period for the reviewed Lambeth Local Plan is likely to align with the new London Plan.

Viability

KOV Forum asked where financial viability and transparency fit into the Local Plan Review. Council officers advised that the council has recently adopted its Development Viability SPD, the principles of which are likely to be taken forward into the Local Plan Review. The Mayor also published his Affordable Housing and Viability SPG in August which may be taken forward into the new London Plan.

KOV Forum advised they are likely to submit EIR requests for major developments. Council officers advised that viability appraisals are required to be submitted for an application to be validated, where policy requirements are not met on viability grounds. KOV Forum may also wish to submit comments to the viability questions in the government's Planning for the right homes in the right places consultation which is open for comments until 9 November 2017.

Basements

KOV Forum asked whether basements are being considered in the Local Plan Review and advised that Lambeth has a more flexible approach compared to Kensington and Chelsea. The impact on surface water flooding needs to be considered and the council may want to consider 'streets under basement stress.'

Council officers advised that the council is consulting on a draft [basement SPD](#) which is likely to be adopted prior to the Local Plan Review. The consultation responses received will also be used to inform whether new policy on basements is required in the Local Plan.

Views

KOV Forum asked why the views policy is not being reviewed, particularly as the local view framework is not being considered as part of some applications. KOV Forum advised that more consideration is needed of the views around strategic roads and they want to avoid a 'wall of development' at Vauxhall as the pressure of development means that less priority is being given to views.

Council officers advised that the views policy was considered to be up to date and an SPD on local views management is likely to come forward in the new year. However, KOV can submit comments on this aspect of policy through the issues consultation.

KOV Forum also advised that it would be preferable if the individual local views in the borough could be turned on and off on the online policies map in a similar way to the London Plan views and this may help people consider them more thoroughly. Council officers agreed to consider this for the next version of the online policies map.

Town Centres

Council officers advised that the Local Plan Review proposes boundary amendments to a small number of town centres and one of these is in the KOV neighbourhood area – Kennington Park Road/Kennington Road Local Centre.

KOV Forum advised that they want to focus on Kennington Cross in their neighbourhood plan rather than Vauxhall. Council officers advised a policy on the mix of uses for a local centre could potentially be considered in a neighbourhood plan.

KOV Forum suggested the need for affordable retail spaces in town centres and that small retail units in mixed use schemes are being converted to residential at a later stage.

KOV Forum stated that in their view Lambeth policies on marketing are not always effective as developers are often marketing properties at too high value for someone to rent them. Council officers advised that the council has a [marketing guidance](#) note published online. Investment and Growth colleagues will also provide information on whether the council has any powers when units are being kept intentionally empty because landlords are deliberately setting high rents.

Tall buildings

KOV Forum feel there are issues around the interpretation of the policy and would like the policy wording to be tightened up as the height of buildings is becoming a particular issue. The policy needs to be as precise as possible otherwise people become cynical of the process of applying the policies.

KOV Forum think that tall towers are not contributing to meeting Lambeth's housing need due to the number of people actually living in them which is lower than the assumptions made in the London Plan housing target.

Air Quality

KOV Forum feel that the EIA process is not working as it should and that some developments (for example the Vauxhall station development) are being screened out from requiring an EIA. Developers need to have the responsibility for mitigating poor air quality where their development will have an impact. Some policy decisions might also be made before we fully understand the relationship between air quality and changes in transport technology.

Council officers advised that air quality is an issue being looked at through the Local Plan Review and encouraged KOV to submit a response on this topic.

Employment Land

KOV Forum asked whether Lambeth feel that KIBAs still have a future and whether Lambeth is exceeding the London Plan target for release of employment land. They also advised that the 2011 census data showed that the number of people who live in Lambeth and who are also employed in Lambeth is possibly the lowest in London.

Council officers advised that the council does see a future for KIBAs and that the Local Plan Review is proposing amendments to the boundaries of some KIBAs (including the gas works) and is also proposing three new KIBAs. Evidence base documents supporting these proposals have also been published. Officers understood from GLA evidence that the overall a number of London Boroughs had exceeded the benchmark for the release of industrial land, partially due to permitted development rights.

Herne Hill

Neighbourhood Forum consultation session

Lambeth Local Plan Review consultation session with Herne Hill Forum
Phoenix House, Lambeth 24/11/2017 10-11:30am
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer) and Nicola Whyte (Delivery Co-ordinator, Investment and Growth)
Herne Hill Forum – Yan Hawkins
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017. The surveys do not ask specific questions about the Places and Neighbourhood chapter of the Local Plan. However, comments from designated and emerging neighbourhood planning forums on these sections of the Plan would be welcome at this stage.
General points made by Herne Hill Forum Herne Hill Forum asked why we are doing the Local Plan review now rather than waiting. Council officers advised that there is not a lot of scope to delay the process given that the process of reviewing the Local Plan is likely to take up to two years and the council is required to have an up to date Local Plan by 2020. It also means that the Local Plan review can be informed by the new London Plan. Council officers understand that it is likely that the new draft London Plan will be published on 29 November and consultation will last until late February. The next round of public consultation on the Lambeth Local Plan Review in 2018 will take account of the content of the draft New London Plan, alongside feedback from the first round issues consultation. Herne Hill Forum asked what is meant by custom-build housing. Council officers understand it to be housing that is not built by an individual themselves but is a type of housing where an individual has greater involvement in the design or build of the development than traditional market housing. Herne Hill Forum asked whether there is currently a definition of affordable workspace. Council officers advised that there is currently no definition in either national policy or the London Plan but is likely to be included in the draft London Plan. Herne Hill Forum asked whether the data used to inform the review of KIBA boundaries is available for neighbourhood forums. Council officers advised that planning history is available through the planning application database and that the GLA also publish a number of evidence base documents related to the economy. The planning policy team does not have any finer grain detail on where social housing is located in an area but would need to map the data they have in the development pipeline on new affordable housing coming forward. Due to a restriction on the licence, the council is not able to publish the raw data for the town centres collected by Experian Goad, but is able to publish the aggregate data. Officers undertook a survey for Herne Hill in 2016 and is available as part of the local plan evidence base ; there are not restrictions on access to the data from this particular survey as it was undertaken in house.

Town centres

Council officers advised that the Local Plan Review proposes boundary amendments to a small number of town centres but that the hierarchy of town centres is set by the London Plan. There is a proposed boundary change to Loughborough Junction. Herne Hill advised that Southwark are designating Herne Hill as a district centre in their new local plan and there are also some difficulties for Herne Hill given that the town centre is across two borough boundaries and has two sets of planning policies. Council officers advised that Herne Hill is already a district centre in Lambeth and that boroughs sometimes use different names for types of town centre.

Herne Hill Forum advised that there are betting shops in Herne Hill and that there is a desire to limit or control that type of use. The number of betting shops may now be saturated but there are now more than a couple of years ago. Payday loan shops are not as much of an issue.

Herne Hill Forum asked whether the Local Plan can influence the types of A2 uses available and a minimum proportion of these uses as there are no banks or building societies in Herne Hill nor are there any cash machines. Council officers advised that the Local Plan could only control the number of A2 uses and not specific uses with the A2 use class. In addition, the local plan contains policies which set out a requirement for a proportion of A1 uses but this is from the starting point that these uses are already there and should be protected, rather than setting a requirement that there should be a proportion of certain types of uses. Cash machines cannot be dealt with through the Local Plan.

Herne Hill Forum asked whether the Local Plan can have a policy to prevent smaller units being developed as bigger supermarkets. Council officers advised that there is a policy for this for major centres. There could be an opportunity for this to be considered for district centres and Herne Hill but would need justification and an evidence base. A neighbourhood plan could explore this if there was a local evidence base.

Hotels

Herne Hill Forum advised that they don't think hotels are an issue in Herne Hill at the moment but that recently there have been a couple of pubs that have developed hotel accommodation above.

Transport

Herne Hill Forum noted there was a question on rat running and asked whether this is something that can be controlled through planning policy. Council officers advised that the transport survey questions go further than planning policy as the council is also bringing forward a transport strategy and this approach avoids duplicate consultation. Some of the things raised through the questions will be dealt with through planning policy and others will be dealt with through transport and/or highways.

Waste

Council officers advised that Lambeth will be getting a new target for waste apportionment in the draft London Plan and there is a focus on London becoming self-sufficient in managing its own waste rather than it being transported to local authorities outside of London. One of the biggest challenges for the local plan review is being able to demonstrate how Lambeth will close the gap between the amount of land safeguarded for waste and the capacity required to dealing with the London Plan waste apportionment. The consultation is seeking people's views on whether Lambeth should work with other local authorities in planning for waste; and how the waste apportionment could be off-set if waste management capacity moved outside of the borough to another part of London. Lambeth doesn't want to allocate specific sites for waste as this can lead to blight but would prefer instead to identify general areas where waste management uses will be supported, such as KIBAs where smaller businesses for waste management can be located. New waste management uses do not have to be large; in Lambeth they are more likely to be small scale.

Herne Hill Forum asked whether the council envisages that existing waste sites move into KIBAs. Council officers advised that this depends on a number of factors, such as whether the site operator would want to move and also whether the proposal would get planning permission. Council officers advised the Council depot on Shakespeare Road is not considered a waste management site by the London Plan as it is considered a space for lorries to park rather than any waste being managed on the site.

KOV Forum also advised that it would be preferable if the individual local views in the borough could be turned on and off on the online policies map in a similar way to the London Plan views and this may help people consider them more thoroughly. Council officers agreed to consider this for the next version of the online policies map.

KIBAs

Herne Hill Forum suggested that they are unsure of any new development sites that could come forward in Herne Hill and asked whether it would be suitable for KIBAs to have residential use above existing buildings which could allow for more housing in Herne Hill. Council officers advised that housing land capacity is assessed pan-London by the GLA and this takes accounts of designations such as KIBAs. In general, KIBAs are likely to continue to be protected as Lambeth can meet its housing need without releasing these sites (subject to what the draft new London Plan might say) Residential development in KIBAs impacts on land value and would displace business and KIBAs protect space for businesses that cannot operate in residential areas. However, the local plan review is looking at KIBA boundary changes and also some limited de-designations.

Infrastructure

Herne Hill Forum asked whether the question on infrastructure is asking for opinions on the prioritisation of projects in the CLIPs. Council officers advised the infrastructure list in the consultation are infrastructure types that the Council will need to plan for at a high level and that people can comment on whether there is anything else we should be planning for.

The borough's infrastructure needs will be published in an Infrastructure Delivery Plan with the draft Local Plan next year. This is separate from CLIPs. Further CLIPs will be coming forward over the next year and will include prioritisation of projects for that area.

Loughborough Junction

Written responses

Loughborough Junction Action Group and the Loughborough Junction Neighbourhood Planning Forum were broadly supportive of the narrative description of Loughborough Junction and Policy PN10 and would welcome the opportunity to improve and update the entry. LJAG would like to see the continuation of Loughborough Junction as a community which supports a wide variety of functions with homes and industrial and other uses co-existing to create a mixed-use community which is both welcomed and celebrated.

Site specific comments

Site	Respondent	Summary of comments
King's College Hospital – Denmark Hill Estate	RPS CgMs on behalf of King's College Hospital NHS Foundation Trust	King's is one of London's largest and busiest teaching hospitals, with a strong profile of local services primarily serving the boroughs of Lambeth, Southwark, Lewisham and Bromley. Their specialist services are available to patients across a wider catchment area, providing nationally and internationally recognised work in liver disease and transplantation, neurosciences, haemato-oncology and foetal medicine. Such services are critical to the welfare and social wellbeing of the local community. King's is one of the country's leading NHS Foundation Trusts. They are a provider of local services, a centre for specialist care and a world-class teaching hospital, and are one of four partners in the Academic Health Science Centre, King's Health Partners, which collaborates on world-class research, driving our vision to become the best medical research campus in Europe. Discussions between King's and the council have advanced considerably since 2016 and this has established a greater imperative to unlock the future development potential of the estate to ensure critical services are enhanced and the medical use of the site improved and modernised. The Lambeth Local Plan (2015) aims to continue to provide and enhance essential local infrastructure, which includes the ongoing reconfiguration of the health facilities of the King's College Hospital site. London Plan Policy 3.16 states that London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure.

Lambeth Local Plan Review consultation session with Loughborough Junction Action Group/Loughborough Junction Neighbourhood Planning Forum

Phoenix House, Lambeth
2/11/2017 9-11am

London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer) and Tom Rumble (Neighbourhood Delivery Lead, Investment and Growth)

Loughborough Junction Action Group/Loughborough Junction Neighbourhood Planning Forum – Anthea Masey

Introduction to Lambeth Local Plan Review

Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017.

The surveys do not ask specific questions about the Places and Neighbourhood chapter of the Local Plan. However, comments from designated and emerging neighbourhood planning forums on these sections of the Plan would be welcome at this stage.

Lambeth understood that its emerging housing target in the draft London Plan would be 1,589 net additional dwellings per annum (dpa), which was only slightly higher than the current target of 1,559 dpa.

General points made by Loughborough Junction Action Group

LJAG advised they have put details of the consultation in the newsletter and also received the presentation from the communications teams at the Lambeth Forum meeting. They have identified two or three issues they want to look at in detail and have some input on. Council officers encouraged LJAG to submit something during this consultation and that there will be an opportunity to submit more detail during the next round of consultation on the draft Local Plan. There may also be an opportunity to provide further detail before the consultation.

LJAG advised that they are submitting more ACVs than other organisations and are happy that the council are supporting their applications for the railway arches.

Town centres

LJAG advised that they would like to see the town centre expanded to front of LJ works. Council officers advised that it hasn't been included in the masterplan in order to protect the KIBA. LJAG advised that they don't want to see a disturbing night time economy.

Council officers advised that policy PN10 currently does not set out a prescribed mix of uses for the town centre. LJAG could comment on a suggested mix of uses for retail and food and drink uses. This could look potentially at the concentration of food and drink uses if this considered to be an issue.

Railway arches

LJAG advised that railway arches are a big issue for them and are impressed with what has been happening in Southwark and their policies for a 'low line' which would prevent developments too close to the railway line which would allow for routes through the neighbourhood. LJAG like the idea of this continuing from Southwark into

Lambeth and would like the council to look at Southwark's policies and see how this could be continued into Lambeth or at least Loughborough Junction.

Green infrastructure

LJAG would like to see a better strategy to link the green spaces within the borough and Loughborough Junction. Council officers advised that the council has published its [Green Infrastructure Strategy](#) as part of its evidence base.

Density

LJAG advised that they have not yet had a conversation about density but are in contact with the Higgs site. Council officers advised that the density matrix may change in the draft London Plan when it is published for consultation. LJAG asked how much the new thinking in the London Plan informs current pre-application discussions. Council officers advised that current decision making is based on adopted policies and not on emerging policy.

Neighbourhood planning

LJAG asked how the Local Plan review will take account of emerging neighbourhood plans. Council officers advised that neighbourhood plans will have the same weight as the Local Plan when they are 'made' and that reference will be made to neighbourhood plans in the relevant Places and Neighbourhood policies. Policies in neighbourhood plans have to be in general conformity with the strategic policies in the Local Plan and the council will provide an assessment of this when a neighbourhood forum submits drafts of their neighbourhood plan. The Local Plan may be an opportunity for groups to achieve things they wish to achieve in their neighbourhood plan before their neighbourhood plan goes through the process and is 'made', as the Local Plan may be adopted first.

Upper Norwood

Written responses

The Crystal Palace and Upper Norwood Neighbourhood Forum submitted a number of evidence base documents they have collated to support the emerging neighbourhood forum for Crystal Place and Upper Norwood area. They argued that the reports demonstrate why the Lambeth area play a significant role that impacts the wider Crystal Palace and Upper Norwood cross border area and that the aggregate impact of Lambeth changes and its policies need to be planned in context with this unique neighbourhood. The Forum set out:

- The Southern part of Lambeth near the Central Hill regeneration area is characterised with an area already suffering from conversion stress and has many cross border issues more connected with the Crystal Palace/Upper Norwood area.
- The area is also suffering from ongoing loss of business and commercial spaces, as seen on the higher slopes of Gipsy Hill.
- There is a general trend that catchment areas to local services are shrinking, placing greater demands to effectively cooperate between relevant Authorities to plan for issues with a cross-boundary impact.
- In addition to smaller scale infill and conversions for housing/flats, the area is seeing larger scale developments and strategic vision/approval for increased housing in Lambeth, Lewisham, Croydon, and Bromley and Southwark in this neighbourhood in their emerging local plans.
- In the latest draft London Plan (see Figure 2.19 and Figure A1.3 attached) the potential for residential growth set to be “high”. There are also shared opportunities by better planning for the area as a whole covering (but not limited to): transport, services provisions, and with business support and its growth.
- Overall the area is unique in the range and dependency for cross border services and planning where residents may require access to local service from up to 5 boroughs (e.g for health and education and access to local open green spaces). The demands to consider NPPF (sections 178-180) is greater for this area, than almost any other part of Lambeth.

Neighbourhood Forum consultation session

Lambeth Local Plan Review consultation session with Crystal Palace and Upper Norwood Neighbourhood Forum
Phoenix House, Lambeth 30/10/2017 18-19:30
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer) and Olga DiGregorio (Delivery Support Officer, Investment and Growth)
Crystal Palace and Upper Norwood Neighbourhood Forum – Andy Quinn, Francis Bernstein
Introduction to Lambeth Local Plan Review Council officers gave an introduction to the Local Plan Review consultation and the 10 borough wide issues being consulted on. The consultation also allows people to make comments on any other aspect of the Plan they think

should be reviewed. The consultation can be found at www.lambeth.gov.uk/lpr2017 and runs until 4 December 2017.

The surveys do not ask specific questions about the Places and Neighbourhood chapter of the Local Plan. However, comments from designated and emerging neighbourhood planning forums on these sections of the Plan would be welcome at this stage.

General points made by Crystal Palace and Upper Norwood Neighbourhood Forum

The Forum advised that each of the policies for the boroughs covering Crystal Palace are different and that for the first time the new Southwark Plan is recognising Crystal Palace as a place. This is useful for it to be recognised for its local character, service provision and its differences to Dulwich.

The Forum advised on some sites within their area (not in Lambeth). The old cinema is up for sale and they would like to see it remain as D2 but it may become residential. The site next to the cinema has an expired permission for residential. The site behind Sainsbury's is earmarked for residential with creative workspace.

The Forum advised that Croydon has its own site opposite the Central Hill Estate and there are concerns about the impact on service provision in the area if this site was also redeveloped. Lewisham also have an estate earmarked for regeneration. If all these sites came forward there is going to be an overall intensification of the amount of housing in the area across a number of boroughs. There are also concerns that the community are not necessarily seeing the benefits of this growth through s106 monies. Council officers advised that a new Infrastructure Delivery Plan will be prepared alongside the draft Local Plan and this will look at cross boundary issues for school place planning. Generally this is dealt with through CIL rather than s106 planning obligations.

The Forum advised that topography is an issue for the area. Churches are a big anchor in the community but there is difficulty in accessing some services by some elderly people due to the topography. Some areas are becoming isolated.

The Forum advised that people in the area are proud of their green spaces and there are a lot of community resources to improve these. Lots of groups are keen to engage in the process and work on projects and they are looking at establishing a crowd funding platform for small community projects.

Neighbourhood planning

The Forum advised that there are a lot of groups active in the Crystal Palace area and the neighbourhood forum gives these groups an opportunity for a platform. The Forum are still working on the boundary for their neighbourhood area and are currently working on an engagement strategy to engage with residents of the Kingswood Estate. The Forum are not sure of the boundary in Lewisham and will then begin to look at the boundary in Bromley. In Lambeth, the boundary will be split between Norwood and Crystal Palace at Gypsy Road and there will be a memorandum of understanding between Norwood Planning Assembly when it comes to consultation.

The Forum have done some work with AECOM and UCL to produce evidence base documents for: town centres, housing, service provision, employment land and business. Council officers advised that it would be useful if the Forum were able to share these documents with the council. The Forum would like to share their evidence base with the boroughs as they are considering the wider area rather than just individual boroughs. Council officers advised if there is anything the Forum want to be addressed before their neighbourhood plan goes through the process, they should submit their comments during

Town centres

The Forum advised that there are large numbers of independent retailers in the town centre and that the small building footprints mean that the centre cannot attract the larger chain stores. The majority of units on the Lambeth side are full and there have been 10 new openings this year. There are currently only three empty units and one is a pub where work will begin in January. However, some businesses suffer from a lack of footfall during the week,

which is getting worse. The Forum is trying to work with Sainsbury's to adopt a similar approach to Herne Hill where you can extend the amount of time you can park there without receiving the £70 fine.

Industrial and employment uses

The Forum advised there has been a loss of industrial sites, particularly in Gypsy Hill, over a quite a long period of time. They advised they would like to see protection of Coopers Yard as there are a number of creative industries operating there. Croydon have earmarked the area for cultural and creative industries.

Transport

The Forum asked whether there is potential for a cross-border parking zone. There is an ageing population in the borough who are dependent on home visitors who are unable to park in the area.

The Forum advised that two ring roads connect in Crystal Palace, with 31,000 vehicles a day passing through in some parts of the area. This is creating big problems with air quality in the area and some people are finding it difficult to walk along Church Road due to air quality.

The Forum are working on a small project to raise the pavement in a particular area and would like to roll out this project to other parts of the area. They would also like to see a wayfinding project but are concerned how this would be co-ordinated particularly as different boroughs have different names for the area. Council officers from Investment and Growth advised that Capital Programmes are looking at the street-scaping programme next year which is going to be based on CLIP projects. Officers are happy to pass on the contacts of the Forum so Crystal Palace can potentially be included.

Cross boundary issues

The Forum advised that there are lot of conversions happening in the conservation areas but there are difficulties in the approaches taken by different boroughs.

The Forum advised that shared service provision is a strength but would like services to engage with each other when services change to assess the impact on other boroughs. A number of services are also moving to the centre of the borough rather than having local facilities.

Council officers advised that a lot of the cross border issues raised are dealt with by lots of service areas within the councils and many of these are outside the scope of planning policy. It would require regular management of these issues across the different boroughs. Council officers offered to raise the issue of co-ordination internally.

Streatham

1. We might need to look at how well Streatham is working as a town centre and consider whether Local Plan policies affecting Streatham need to change. What are your views on Streatham town centre boundaries and its uses?

Survey responses

60 respondents answered the question. Generally respondents argued that the current retail offer needs to be improved, the centre lacks identity and public spaces and the High Road is not conducive to a successful town centre. A number of respondents also felt that Streatham had not been focussed on by the council and argued that the main focus tends to be on Brixton.

Town centre boundaries

Respondents provided various comments and suggestions on how the boundaries of the town centre could be amended which can be summarised as follows:

- Streatham has multiple areas: Hill, Centre, Streatham and Streatham Vale and three respondents argued there is presently no definable town centre boundary.
- The primary shopping area boundaries are fairly arbitrary.
- Three respondents suggested the council should use zoning in the town centre.
- The boundary should be split into two distinct areas, using Streatham and Streatham Hill stations as the circumference for a concentration of shops and services.
- The town centre should be shortened and expanded into the side roads to give it a more rounded shape.
- The main commercial area to the south should be extended so it covers the roads near to Tesco and the ice rink.
- There will always be two areas of concentrated activity in such a long high street and so the town centres should be joined together and incorporate the 'Dip' area and the Marks and Spencer and Aldi site.
- While Streatham is in a state of flux with major redevelopments still being completed at Streatham Hill and Streatham station, it may be premature to decide on any de-designation until the impacts of footfall are clearer.
- Gracefields Gardens NHS service centre should be excluded from the central retail area as this likely not to be a retail-led redevelopment.
- Streatham Common station and Greyhound Lane should form a local town centre separate from the High Road.
- The current gap in the major centre shopping area designation between the two mainline stations does not make sense.

Retail offer

Streatham's retail offer was subject to much debate. Three respondents noted that there are positive aspects to Streatham's current retail offer:

- There is a fantastic eclectic mix of shops and restaurants.
- New high end stores such as M&S and Brickwood have been a success.
- Streatham has become a hot spot for food establishments.

However most of the respondents criticised the retail offer, with the following issues raised:

- There is not enough diversity in the retail offer and this has reduced over time.
- Streatham doesn't need the same services shops duplicated in each part of the town centre.
- There are few clothes shops and nowhere to purchase items such as school uniforms or fitted shoes.
- Streatham needs more high quality retail units and tenants.
- A new large department store and small independents are sought, including a good butchers and greengrocers.
- The number of betting shops, payday loan shops, 'junk' shops, fast food outlets, nail shops, hairdressers, charity shops and low quality retail shops are a real issue.
- There are too many vacant units.

Respondents argued that the retail offer varies geographically and highlighted that the whole of the Streatham is not uniform in the quality of its retail offer. The issues raised by respondents included:

- There are still areas where uses need to be improved.
- All the retail shops are in the middle of the High Road and there needs to be more shops in Streatham Hill.
- The shops on Leigham Court Road opposite Streatham Hill station could be demolished.
- The shops along Mitcham Lane are poor quality.
- The Dip area has poorly maintained shops.
- There is an over-concentration of supermarkets in the south of the town centre and a supermarket is needed in Streatham Hill.

Two respondents questioned the current policy approach to Streatham. One asked how a natural evolution of the area can be encouraged when current policy is maintaining 60% A1 uses and limiting food and drink to 25% whilst another argued that the 60% target is academic.

One respondent argued that Streatham faces a threat from the proposed Croydon Westfield and steps need to be taken to ensure the High Road can compete as a destination. The respondent suggested that it could become a non-chain 'boutique' style destination which means current A1 units cannot be readily turned into bars and restaurants. Another respondent suggested that the high level of sub-division of premises is controlled.

Night-time economy

Some respondents felt that the Night Time Economy was non-existent in comparison to other towns in Lambeth and that Streatham lacks the entertainment identity that Brixton has, highlighting the need for mid-size bars or clubs. Other respondents felt the restrictions on the number of bars and restaurants should be relaxed whilst two respondents felt that A3 uses should be encouraged over more A4 uses. One respondent suggested that a bowling alley such as the All-Star Lanes is added to the area whilst another encouraged the re-opening of the Streatham Theatre as an arts venue.

Identity and public spaces

Five respondents argued that Streatham is lacking identity or areas of high quality public spaces and four suggested improvements. The issues raised by respondents included:

- Streatham lacks areas of interest, public spaces or public art like Windrush Square, The Cut in Waterloo or Clapham Old Town.
- The Tesco Extra development is disappointing in terms of useful public space.

- Streatham needs more pedestrianized areas like Balham's Hildreth Street
- Streatham needs a clearer centre point possibly the square by Odeon, St Leonard's Church or Streatham Green.
- Areas need to be demolished to develop public space.

One response encouraged using CIL/s106 to improve the buildings and the shopping offer in the Streatham Hill end of the town centre but noted that the does look better with improved shop fronts and lighting. Generally more and better shops were encouraged in this area.

Streatham High Road

Streatham High Road was criticised by many respondents who raised issues such as the road being treated like a dual carriageway, congestion, pollution, noise and lack of greenery. Other issues raised by respondents included:

- Streatham High Road dominates the area which feels like a through road rather than a town centre, which makes the shopping experience unpleasant and unfriendly.
- The High Road is long, difficult to manage and needs to be more cohesive.
- Traffic flows are slow and narrowing roads creates more problems.
- The High Road doesn't benefit the local economy.

One respondent would like to see Streatham Town centre become more family friendly, highlighting that it is one of the most dangerous in London with traffic and toxic air. Another response said that Streatham is not usable as a town centre on account of the heavy traffic and inability to cross the road. Other respondents suggested that until the amount of road traffic is addressed, the town centre will not see much improvement as it will be too linear, too congested and too polluted.

Suggestions to improve Streatham High Road included:

- Planting more green trees in the central reservation - Italian Cypress could be used to provide more greenery, soak up emissions from vehicles on Streatham Hill, raise the eye-line as the trees grow taller and provide a wall of green amongst the grey high street.
- Considering pavement widening and further tree/hedge planting to separate the retail and leisure premises from the High Road.
- Installing uplighters to create a mood at night.
- Installing attractive street furniture bins, bike racks, seating, and lamp posts to encourage people to stop rather than just pass through.
- Traffic calming measures.
- Convert all loading and parking to 'pads' so that when they are not in use, they are more footway than carriageway.
- Introducing a CPZ through Streatham would make a massive difference for local residents.
- Controlling the number of mini cab drivers waiting on residential streets.
- Implementing a tram to run along the main road to Brixton to make Streatham more accessible.

In relation to transport, one respondent suggested the need to look at wider transport issues with Southern Rail, whilst another suggested that Streatham Hill station requires an upgrade.

- The council previously undertook an extensive survey with Savills which looked at separating Streatham into 3 distinct areas and a plan was put together but it is unclear about the amount of resources allocated to these theoretical plans and what materialises from them. The council should save money on consultations and spend it on greening the High Road.

- The consultation is a good opportunity for the people of Streatham to have some influence on the plans. Streatham Town Centre desperately needs some attention to make it a more attractive place to go and to turn it into a pleasant shopping centre to visit.
- There should be more cycle routes, more trees and shrubs, wider paths with outdoor seating, less betting shops, junk shops and takeaways and more traffic calming measures. More street cleaning should take and there should be more food and drink outlets and there is a need for a large project like Hidreth Streeth in Balham.
- The council should restore the Streatham Hill Theatre as the Battersea Arts Centre equivalent for the south of the Borough to attract visitors and revenue to Lambeth.
- A clean air corridor along the High Road should be introduced as a matter of urgency.

Written responses

Members of Clapham Park Forum encouraged more parking and more clothing shops for those who cannot shop online.

One respondent argued that the partnership with the Business Improvement District has made significant changes to the area and the High Road, which continues to develop as a shopping destination, but A1 needs to be preserved. They also argued:

- There is opportunity to develop retail and office hubs around both mainline stations. The development opportunity around both mainline stations should be harnessed, incorporating mixed-use premises for both office and retail use. The Hideaway 'workspace' development demonstrates there is a clear appetite in Streatham for more suitable and modern office space.
- Both stations are witnessing an increase in usage and contribute to a significant proportion of journeys to Brixton, exacerbating the pollution problem along the A23.
- The Leigham Court Road parade of shops is home to a variety of different businesses servicing local needs. Ensuring this stretch of shops between the high road and car park continue to thrive as driving footfall is key. The parade may need a separate use class policy so that no more than 2 in 5 of the total number of shops can be A3. This would ensure the mix of businesses remains healthy and it does not become a parade of takeaways or bars which would drive footfall in the evenings but reduce service provision and footfall during the day.
- Streatham suffers from localised concentrations of betting shops which result in increased anti-social behaviour and reduce the quality of the retail offering for residents and shoppers. Any 'healthier high street' initiatives that restricts further conversion of premises to sui generis for gambling purposes are welcomed.
- Planning policy should be used to curtail the explosion in 'pay day lending companies' operating on the High Road. This will ensure the road remains vibrant and capable of supporting footfall to sustain established retail chains and local retail businesses.

Site specific comments

Site	Respondent	Summary of comments
Homebase, 100 Woodgate Drive, Streatham	GR Planning Consultancy on behalf of HHGL	Bunnings is the leading home improvement and outdoor retailer in Australia and New Zealand. The home improvement and garden market sector within the UK and Ireland is growing but is also fragmented and underserved. Bunnings' aim to re-invigorate this market and introduce the Bunnings brand, which has been built on the three strategic pillars of lowest price, widest range and best service. Bunnings acquired Homebase as a platform to build the Bunnings

		brand within the UK and Ireland and have allocated £500 million to launch this over the next 3-5 years. Bunnings' investment has already commenced with the first Bunnings Warehouse store in St Albans opening in February 2017. Since then, a further 10 Bunnings Warehouse stores have opened. Bunnings employ 12,000 team members within the UK and Ireland, including over 1,500 team members in London and these numbers are expected to grow significantly as Bunnings converts existing Homebase stores and invests in new site opportunities. Bunnings remain fully committed to the Streatham Vale Homebase store. The store is leasehold, with at least 6 years of tenure remaining. Bunnings are looking to include this store within its current investment programme and brand launch. An application to facilitate the works that form part of that investment has been submitted to the council and this investment will secure new employment, as those Homebase stores already converted to the Bunnings brand have seen, on average, a 50% increase in staff numbers.
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Lambeth Local Plan Review: Streatham Town Centre workshop
Streatham Library 01/11/2017 18.00-19:30
London Borough of Lambeth – Catherine Carpenter (Delivery Lead Planning Strategy and Policy), Dominique Barnett (Principal Planning Policy Officer), Rob East (Planning Policy Officer), Iago Griffith (Delivery Co-ordinator, Investment and Growth), Rheanne Holm (Neighbourhood Delivery Lead, Investment and Growth) Cllr Wilcox, Cllr Jaffer, Cllr Ainslie, Cllr Kazantzis, Cllr Treppass, Cllr Clark, Cllr Hill Stakeholders from Streatham BID and Streatham Action
Do you think the boundaries of the town centre and primary shopping areas need to be changed? How should they be changed? - Attendees had a range of suggestions for the boundary of the town centre and primary shopping area which included: - The town centre boundary should reflect the BID boundary which goes down to Sainsbury's. - The primary shopping area could cover the whole of the town centre to support retail. - Retail to the south of the boundary, including the top of Greyhound Lane, should be protected. - The primary shopping area boundaries could be changed to where there are obvious success stories, including clusters of uses. - The area in between the two primary shopping needs to be looked at. - The town centre is very long and stretched out – what are the advantages of extending the boundaries further? - Should the retail units in Ambleside Avenue be included in the town centre? - Some attendees suggested that we look at Wandsworth's policies and their approach to centres such as Balham and Tooting. - Some attendees highlighted concerns about 'junk' shops concentrating in the primary shopping areas and around St Leonard's junction. - The current primary shopping area boundaries has been useful in protecting retail at ground floor in Norwich House. - Some respondents focussed on issues around Gleneage Road and The Dip: - There are issues with parking due to the presence of minicab businesses. - There are a lot of vacant units and it was suggested this could be linked to perceptions of inclusivity and whether other shops would survive in the area. - The area is perceived not to be safe by some. - There has been subdivision of units without consent. - There are too many coffee shops and restaurants which have replaced independent shops.
Does Streatham have the right mix of town centre uses? - Attendees highlighted that there are many food uses in Streatham and there is still growth potential for food and drink uses, including coffee shops. - High end chain stores were highlighted in Streatham Hill primary shopping area but attendees felt there was a disparity between different sides of the road. - Some attendees suggested the need for more ethnic food shops to reduce the need to travel to

other centres.

- Local people do not really shop in Streatham as it does not have the same retail offering as centres such as Brixton and there is need to encourage the local community to stay in Streatham. For example, you may go shopping in Brixton, eat there and then visit the cinema. Attendees suggested that this was a self-fulfilling prophecy whereby people go elsewhere to the best shops which mean the best shops locate elsewhere.
- Some attendees said the focus should be experiences and the food and drink offer. For example, Oxfam is a large retail unit and there has been interest from an agent for food and drink.
- Other attendees suggested that more retail units should be encouraged with a greater variety of uses, particularly for clothing chain stores, curtain shops and hairdressers.
- Attendees welcomed food stores, particularly the new M&S and Aldi but also would like to see a Waitrose.
- High street bands were felt to be good as they are reliable but attendees would also like to see independent and affordable shops, with a bigger range of specialist businesses to help with the competition from Westfield Croydon.
- It was felt by attendees that offices are more suited to upper floors to allow active frontages at the ground floor. Certain sites have the potential to accommodate big offices but there are few of these.
- Attendees thought that leisure facilities are important and questioned how more leisure and cultural amenities can be encouraged. Some suggested that there should be no limited to facilities within the D Use Class and that more should be done to protect and safeguard what is already there for the future.

Should we be setting a different target for the percentage of retail uses in the primary shopping areas?

- Much of the recent growth in Streatham has been non-retail.
- Some attendees felt that 60% retail is an aspirational target and should be reduced to 50% to give the centre more flexibility.
- Concern that increasing the retail target will increase the amount of pound shops and 'junk' shops.
- Other attendees felt that we need to keep the A1 percentage as high as possible, potentially expanding the primary shopping area, as retailing is important for people who work in the area and use it during lunch breaks.

Should we limit the number of betting shops and/or payday loan shops in Streatham?

- Attendees felt there was a concentration of betting shops around Streatham Hill, with three units next to off-licences. Betting shops near pubs and off-licences was considered to be an issue.
- Some attendees felt that an increase in betting shops and payday loan shops are not supported and there should be a limit on the overall number.
- Other attendees suggested that the number of betting shops have reduced since the financial crash and that it will be interesting to see what will happen to betting shops if a cap is introduced on fixed odd terminals.
- Some attendees said we need to avoid displacing these uses to other locations in the borough which do not currently have a concentration.
- Concern that the bingo hall has become a casino.

Should we be controlling the proportion of financial and professional uses (A2)?

- Some attendees did not think it was a bad thing to have too many estate agents and that banks and building societies provide active frontages which attracts customers. Attendees questioned why we would continue to limit A2 uses.
- Other attendees suggested there was a concentration of banks in the Streatham Common primary shopping area. It was also suggested that A2 offices may not employ large numbers of people and may not be using ground floor units in the most productive way.
- Some attendees raised concerns with the parking associated with estate agents and the problems

with parking on nearby side roads. It was suggested that this could be addressed through the introduction of a Controlled Parking Zone but was balanced to allow parking for shoppers and residents.

What are your views on the night-time economy in Streatham?

- It was felt that the night-time economy was a dilemma for councillors and that lots of residents are not supportive of the night time economy due to noise.
- Other attendees acknowledged the increase in the night time economy and suggested there are no major issues. It was felt that there is a history of night-time events in Streatham which needs to be revived to bring more people into Streatham to support the local economy. More bars and craft beer shops would be welcome but overall good management is needed to
- Attendees suggested that they didn't want Streatham to become like Clapham but somewhere in between as young people are currently travelling to other places than Streatham. It was suggested that the night time economy is directed to the north of the town centre.
- Attendees highlighted the need for a cultural offer as well as a drinking officer. Hideaway was given as an example of something good as it offers daytime uses such as affordable workspaces/ small work areas. Others welcomed cinemas and theatres and an 'early evening economy' was suggested through shops, culture and the food offer.
- It was suggested that the Local Plan could be used to enhance food and film festivals and that the bid for London Borough of Culture should build on the cultural heritage of old theatres.
- Attendees also highlighted the need to co-ordinate with licensing.

Is there anything else we should be considering?

- The absence of a tube impacts on the retail offering.
- Some attendees questioned how we could deal with the competition from online shopping. It was suggested that there are a lot of people commuting out of Streatham for work and that encouraging Click & Collect may help to capture these people. Others suggested that we move towards experience-based businesses.
- There is a need for affordable rent for small units.
- There are issues around deliveries from companies such as Deliveroo. Parking was also highlighted as an issue and attendees felt that it is important for bringing people into the area and at night when trains do not run late.
- Attendees asked whether it was possible to have a link between change of use and requiring shop frontage improvements. It was asked whether it would be possible to have a unique Streatham designed hanging sign for local shops.
- The loss of Pratts department store was seen to be an issue.
- The Streatham market didn't work as charges for licenses were too high (£15 per pitch) and products were too expensive.
- Attendees would like to see a guide for Streatham online and also more of the Mayor's Outer London Fund lighting scheme.
- Lack of demand for hotels in Streatham.
- There is a need to tie together transport options, with enhanced transport options including Crossrail, trams, Overground and improved provision east to west.
- The A23 needs to be made cleaner, with better cycling and walking options including cycle hire schemes.
- Temporary event notices should be devolved locally so that local decisions can be made on what events to run.

3.15. General comments

In response to the 'General comments' survey, 29 responses were received. A total of 3 written responses, including statutory consultees, was received.

Survey responses

The general comments can be summarised into the following issues:

- Oval Gasworks have been decommissioned and are redundant. In certain areas of Oval and Prices ward 'Oval Gasholders HSE Consultation Zone' shows as a constraint but as this is no longer the case, this constraint should be removed.
- The council should review the process of issuing contracts before any aspect of the Plan is implemented. The high cost of major works and the low variation in bids between contractors can push up costs and reduce the availability of funds for the Plan.
- Lambeth is the third worst borough in London for internet access. The poor internet connection and speed is detrimental to small businesses and freelancers who rely on internet access for their business.
- Radical measures are needed to reduce traffic and its issues of noise pollution, road safety and air pollution. Road users can no longer be given priority and serious steps should be taken to discourage car use: congestion charging, strict speed limits and parking.
- Lambeth views should be protected, particularly the one down Courtenay Street which has already been compromised.
- The surveys are well-designed and the consultation is a good opportunity for all residents to be involved in how they want to live.
- Tall buildings policy needs strengthening as the current plan indicates that tall buildings will be considered on their merits outside areas where policy specifically indicates that tall buildings can be proposed (generally Waterloo and Vauxhall) which raises the prospect of tall buildings virtually anywhere in Lambeth. These tall buildings can significantly and seriously affect the amount of daylight and sunlight to people's homes and the affected properties may not benefit from statutory daylight and sunlight protection. Tall buildings should be restricted to areas that have been identified through the Local Plan process as appropriate and there should be a presumption against tall buildings for all other areas, except where such development can be justified to put the onus on the developer.
- The events strategy for Brockwell Park will have a detrimental effect on the local community and loss of amenity.
- New developments should ensure access to healthy food, something which is required to tackle obesity. The Local Plan should encourage developers to maintain or enhance opportunities for food growing, including local shops or space for market stalls or ensure easy access through the development of shops or food markets which sell a diverse offer of food choices.
- The Local Plan should highlight the importance of libraries which should not be converted to other uses. Annex 2 says that Carnegie Library will have improved library provision but in reality the number of hours with a fully trained librarian have been reduced.
- The existing policies of Q5, Q7, Q10, Q14 and Q22 should be maintained.
- The proposal to designate Knollys Yard as a KIBA should clarify the types of businesses that could locate there, the advantages and disadvantages to the local neighbourhood and the impact in terms of traffic, loss of amenity and environment. There are also concerns about alternative vehicular access routes other than Knollys Road which is already very busy and congested and in an emergency situation there would not be a point of access for emergency vehicles.
- The preservation of conservation areas is of primary importance for the character and distinctiveness of Lambeth and even small developments can degrade a conservation area.

- There should be closer working with neighbourhood planning groups in Lambeth. With Lambeth and Norwood Planning Assembly preparing plans, there is possibly a duplication of effort and no consensus of what Lambeth residents want. There should be joint thinking on how neighbourhood planning groups can best operate which capitalises on engagement with those that live in the borough.
- There should be a presumption against basement development in built up areas as it has proved highly disruptive to neighbouring houses and should be more closely monitored.
- Small businesses cannot necessarily afford sound proofing and noise levels and the night time economy in Brixton can disrupt the operation of these businesses. Support should be given to these businesses for the impact of noise.
- Lambeth has failed shopkeepers, residents, library users and sport centre users and there is little point in setting out a plan if infrastructure is being dismantled for the benefit of outside interests.
- The council is allowing a laissez faire approach to development outside of 'hubs' which has seen a massive developments without CIL payments being spent on the area. Camberwell is badly neglected by Lambeth, with all favour going to Herne Hill and Brixton.
- The Theatres Trust is satisfied with Policies S1 and S2 in Lambeth Local Plan 2015, in that they clearly seek to support the development of new community and cultural facilities, as well as safeguarding existing community and cultural facilities. It recognises the value of such facilities to the economy and to the health and wellbeing of the local community and wider area. The Trust therefore recommends Policies S1 and S2 are carried forward into the new local plan.
- The council is closing our local libraries for the benefit of profitable companies and using our local parks for commercial purposes. These buildings and spaces were given for the enjoyment of the people of Lambeth and allowing libraries to become private gyms and cinemas at public expense makes no sense.

Written responses

The Ministry of Defence stated that Lambeth falls outside of statutory safeguarding zones therefore the Ministry of Defence has no safeguarding concerns.

Statutory consultees

Historic England provided a response made in the context of the National Planning Policy Framework and its core planning principle that planning should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life both now and for future generations. Historic England's comments can be summarised into the following issues:

- The adopted Lambeth Local Plan is an accessible and readable document containing references to the historic environment and heritage assets in a range of policies as well as dedicated policies in Section 10 and in the site allocations. Integrating heritage considerations in this way is helpful and assists in ensuring a positive policy approach to the historic environment in accordance with paragraph 126 of the NPPF.
- It is too early to identify how the new approaches in the Mayor's spatial development strategy and the levels of growth allocated to Lambeth will affect the Local Plan review but this could result in a more extensive or full review of the Lambeth Local Plan, as could the review of the NPPF.
- The Mayor has a draft new policy for London's World Heritage Sites which reflects the recommendations of the report of the ICOMOS/ICCROM Reactive Monitoring Mission to Westminster World Heritage Site in February 2017. This concluded that greater weight should be given to the protection of the Outstanding Universal Value of the world heritage site and this should be reflected in a more concrete manner in policy and guidance. A review should be undertaken of what this means for policies in the Lambeth Local Plan for the policy relating to Westminster WHS and other specific policies guiding development within the setting of the WHS in Waterloo and Vauxhall.

- Completing the views analysis previously undertaken during the Mission visit and giving further attention to how 3D modelling can be embedded into both Local Plan policy and practice would ensure a positive planned approach thus meeting the recommendations in the ICOMOS/ICCROM report. As part of the Local Plan evidence base the views analysis should assist the sustainability appraisal judgements and de-risk the Local Plan process.
- The completion of the Management Plan for Westminster WHS will assist in ensuring a sound policy approach is development for the policies in the development plans for the boroughs that are within the setting of the WHS. The Westminster WHS steering group will need to expedite this so that there is timely input into Local Plan reviews.
- The most relevant recommendations in the ICOMOS/ICCROM report at 2,4,8,9,10,13,14 and 18.
- The policy for tall buildings should be reviewed in the context of the new draft London Plan, together with related Supplementary Planning Guidance including for Waterloo, Brixton and Vauxhall.
- The views policy in the adopted plan should be reviewed in the context of the new draft London Plan approach, including any requirements based on changes in the technology defining these.
- Historic England would be happy to review and discuss a sample of conservation area appraisals in the borough as these provide a foundation for planning policy, helping to define significance and also to identify issues that can be addressed through Local Plan policy.
- To gain a strategic and local understanding of the character of the borough, it is encouraged to take the Lambeth Local Distinctiveness Study 2012 further to provide a spatial picture of the borough's character. While the sampling of different typologies provides many insights and useful information about Lambeth's built environment and heritage, factoring this up into a borough-wide study provides a tool for strategic policy and can aid engagement and understanding for applications in the planning process and the general public. Historic England's Characterisation of London's Historic Environment provides a summary of methods and approaches taken and may help in taking Lambeth's study further.
- Building typologies and character is addressed in Historic England's London's Character and Local Density, which examines how different building typologies may be suited to achieving denser development in a variety of character areas. It is worth noting that the Mayor's draft Housing Strategy places new emphasis on mid-rise to achieve densification in London as opposed to tall buildings, with the latter still relevant in defined locations.
- It will be appropriate to reflect the latest position for Lambeth's Archaeological Priority Areas (APAs). The Greater London Archaeological Advisory Service is conducting a review of the APAs, identifying different tiers of archaeological significance.
- New site allocations will require consideration of how these are integrated into the existing character and heritage of Lambeth in accordance with paragraphs 58 to 61 and 126 of the NPPF.
- The draft London Plan is bringing forward a proposal for small sites, defined as up to 25 dwellings. The fit of this proposal with local planning policy and site allocations is not yet clear but will need careful consideration and there may be revisions required to local plan design policies, in terms of referencing design codes.
- The Mayor's draft London Plan gives some priority to development in and around defined town centres. Any potential implications for the historic environment should be taken into account.

The Environment Agency provided general comments on flood risk, contaminated land, water resources and quality and biodiversity and wish to see the Local Plan review aligning with the Environment Agency Thames Estuary Plan. Consideration should also be given to the Strategic Flood Risk Assessment, Preliminary Flood Risk Assessment, Environment Agency Flood Maps, Flood Risk Management Plan and Surface Water Management Plan.

The Environment Agency's comments can be summarised into the following issues:

Flood risk

- The borough lies in the Wandsworth to Deptford TE2100 Policy Unit and has the largest developed area of any Policy Unit. The ground level in much of the floodplain is between 1 and 3m AOD whereas the level on the Thames frontage is generally higher (typically 4m AOD). Tidal flood risk should be managed in accordance with the measures set out in the TE2100 plan, taking into account the ability to implement future improvements to flood defences.
- The emerging Local Plan can help to ensure that new developments are resilient over their lifetime and help improve sustainability of existing communities. Managing flood risk can improve the economic prospects of communities and improve the environment.
- Planning for flood risk management should reflect the plans of neighbouring authorities and cross-boundary working should form part of work under the Duty to Cooperate. The provision of infrastructure for flood risk management is a strategic priority to be considered in local plans and local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans.
- As the flood defences are improved there should be collaboration with adjacent council areas on the planning, design and construction of improvements to the flood defences and the riverside. When defences are raised, it is likely that footpaths and other public access will also require raising in some areas. Actions involving cross-boundary working between local councils should consider the following:
 - A consistent approach to improving the flood defences and the riverside at the boundary between the London Borough of Lambeth and the London Borough of Wandsworth at Nine Elms.
 - A consistent approach to improving the flood defences and the riverside at the boundary between the London Borough of Lambeth and the London Borough of Southwark near the Royal National Theatre, which is a very busy public thoroughfare.
- The Tidal Thames Breach Modelling has been updated and this replaces both the breach modelling and upstream inundation modelling from March 2015. The new 'Thames Tidal Upriver Breach Inundation Modelling 2017' equitably models continuous breaches along the defences between Teddington to the Thames Barrier. It is noted that Lambeth Town Centres and Opportunity Areas for development have identified areas at the west of borough and updated levels from within the breach extent for these areas are provided.
- Safe access routes and inundation rates are important considerations in flood risk areas as well in areas of residual risk. The number of new developments and properties must be appropriate to the levels of flood risk.
- It is pleasing that the council will not support habitable rooms (any room used or intended to be used for sleeping, cooking, living or eating purposes) and other sensitive uses or self-contained basement flats and other underground structures in areas with a high probability of flooding such as Flood Zone 3a and b.
- Lambeth's SFRA states that future development within Zone 3a High Probability can only be considered following application of the Sequential Test. Development is only permissible in areas at risk of flooding such as Waterloo and Vauxhall where it can be demonstrated that there are no reasonably available sites in areas of lower risk and that the benefits outweigh the risks from flooding (the development must pass the Exception Test).
- Policies and allocations within the emerging Local Plan should ensure no inappropriate development in areas of high flood risk, development in areas at risk of flooding should be safe without increasing flood risk elsewhere and should contribute to reducing flood risk for existing communities.
- The council should identify the risk of flooding from all sources through their SFRA and under Duty to Cooperate work to manage and resolve any cross-boundary risks.
- TE2100 requirements should be taken into consideration to ensure future flood risk management options and safeguard land as appropriate.

- The emerging Local Plan should reflect the Riverside Strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.
- In accordance with the NPPF, development should not be permitted if there are reasonably available sites appropriate for development in areas with a lower probability of flooding. The council should determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk as required by the sequential test in the NPPF. The Environment Agency is best placed to provide expert advice on the likelihood, scale and impacts of fluvial flooding which the council need to make informed planning decisions. The sequential test should be based on the SFRA as well as current flood probability from rivers and could be widened to take into account future flood risk from climate change and other sources of flooding. The sequential test is more effective if applied early in the development of the local plan so it properly considers the flood risk of the potential draft site allocations derived from SHLAAs and equivalent employment land assessments. It will mean that some sites are not taken forward and lower risk sites are reconsidered as reasonable alternatives. It should be in a publicly available document so it is transparent how the council has considered flood risk.
- The Environment Agency normally challenges draft local plans allocating land for development in Flood Zones 2 and 3 if it is not informed by a sequential test based on a Level 2 SFRA. It is important to note that if a site is allocated in the local plan then there is no opportunity to apply the sequential test at the planning application stage.
- Recent updates to climate change allowance may have an impact upon development sites in terms of flood risk. The Environment Agency guidance on considering climate change in Flood Risk Assessments was updated in February 2016 and provides climate change allowances for peak river flow, peak rainfall, sea level rise, wind speed and wave height. It provides a range of allowances to assess fluvial flooding and advises on what allowances to use for assessment based on vulnerability classification, flood zone and development lifetime.

Contaminated land

- The Local Plan can help ensure that groundwater is protected and where necessary improved during regeneration and development for the benefit of people and the economy.
- Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater and is often caused by previous uses such as former factories and mines, as well as new development such as petrol filling stations and cemeteries. Land contamination, or the potential for contamination, is a material planning consideration.
- The Local Plan has a key role to play in facilitating the improvement of land affected by contamination. The Water Framework Directive and the Groundwater Daughter Directive set out objectives for groundwater including aiming for good chemical and quantitative status; no upwards trends in pollution; and preventing or limiting the entry of certain substances to waterbodies. The council must have regard to these objectives and therefore should ensure their decisions help achieve these goals. Dealing with land contamination can help contribute to achieving the objectives of the Water Framework Directive.
- Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. The overarching approach to groundwater protection needs to be considered at the strategic planning stage and the Local Plan should identify sensitive groundwater areas along with policies for alternative approaches, such as cross boundary discussions with neighbouring LPAs, Environment Agency (where source protection zones straddle boundaries) and water companies.
- Future developments should be in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised. Local Plan policies should ensure that developing contaminated land won't create unacceptable risks or allow existing ones to continue. Land should be managed sustainably, protecting soils and water and contributing positively to reducing the impacts of and adapting to climate change.

Water resources and quality

- Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and climate change will have an impact on water resources in the future. The Local Plan can help ensure that water resources are protected and where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.
- Planning for water resources and water supply in the Local Plan should reflect the plans of neighbouring local councils and water company resource zones. The process will be more effective and better informed if it involves water supply companies.
- The emerging Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and council should work closely with water companies when they are producing their Local Plans.
- The council should ensure the emerging Local Plan and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings/phasing of development. The Infrastructure Delivery Plan can help with understanding of what is needed and is therefore an important part of the evidence base.
- The Environment Agency have a duty to manage water resources and to plan how to use them in a sustainable way, now and in the future. To do this they plan, monitor and regulate water resource use.

Biodiversity

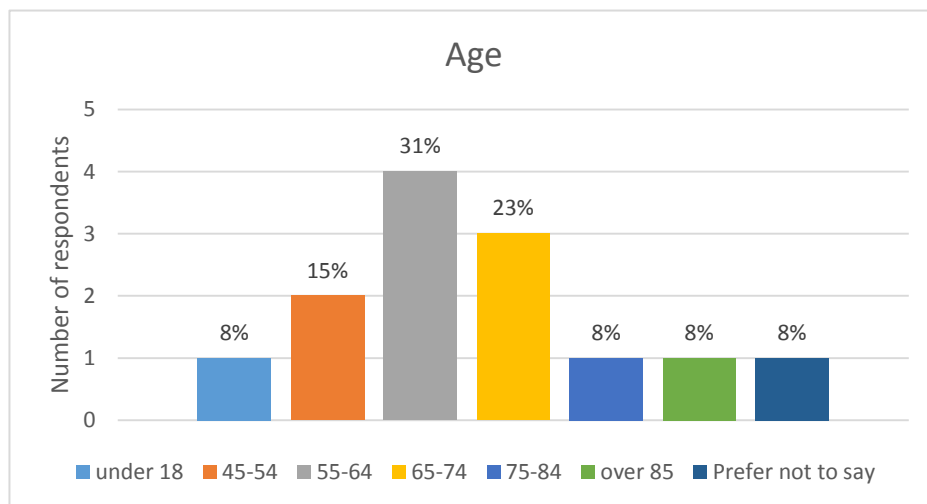
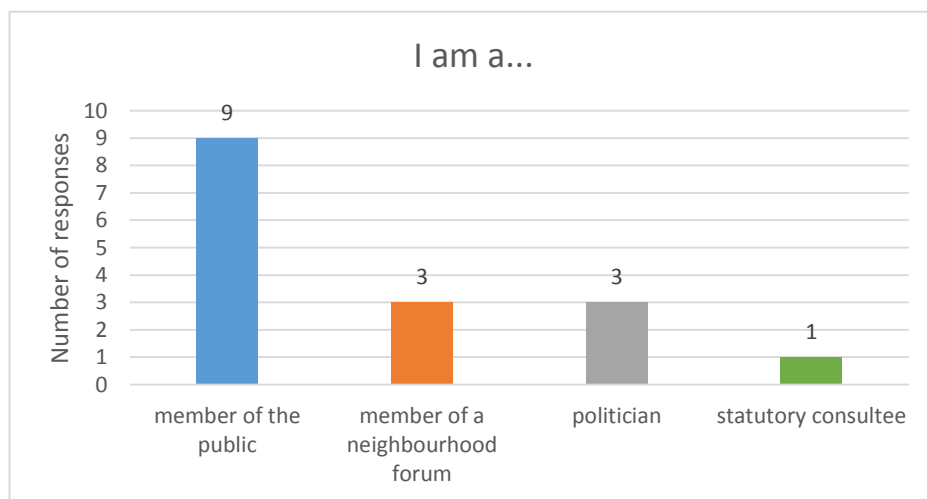
- The Local Plan can provide a mechanism to improve biodiversity by establishing strategies, setting out policies and land use options to ensure development avoids damage to existing wildlife sites and corridors and provides opportunities to develop new habitats to link rivers. This will provide multiple benefits to society, including helping to reduce the impacts of climate change and enabling species and habitats to move as environmental conditions alter.
- The council should set out a strategic approach in the Local Plan, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- Nature does not follow local authority boundaries and planning for biodiversity in the Local Plan requires continuity and consistency across neighbouring LPA boundaries and encouraged the council to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans.
- Local Plan strategies and policies should enhance and protect water related biodiversity and contribute to helping wildlife adapt to climate change and reducing its adverse impacts.
- Future development should improve water related biodiversity through valuing nature, protecting and enhancing or creating healthy, well-functioning ecosystems and ecological networks.

3.16. Sustainability Appraisal

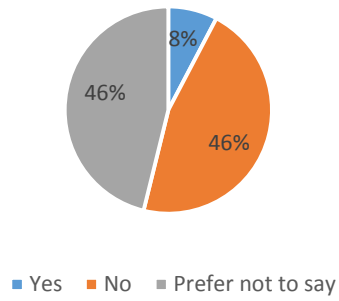
In response to the 'Sustainability Appraisal' survey, 13 survey responses were received. Six of these provided comments.

Survey responses

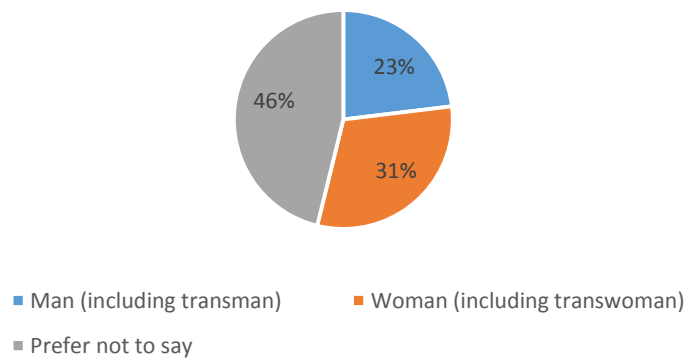
- The majority of responses for the Sustainability Appraisal survey identified as being members of the public. Three respondents identified a member of a neighbourhood forum and three identified as being a politician. One respondent identified as being a statutory consultee (Historic England). It should be noted that some respondents identified as belonging to more than one category.
- The majority of respondents identified as being aged 45 or over, with 15% identifying as being 45-54, 31% identified as being 55-64 and 23% identified as being 65-74.
- 8% of respondents identified as having a disability or living with someone who has a disability.
- 23% respondents identified as being a man (including trans man) and 31% identified as being a woman (including trans woman). The remaining 46% preferred not to say.
- Seven respondents identified as being White British and three identified as being White: Other Background (Italian and Jewish).



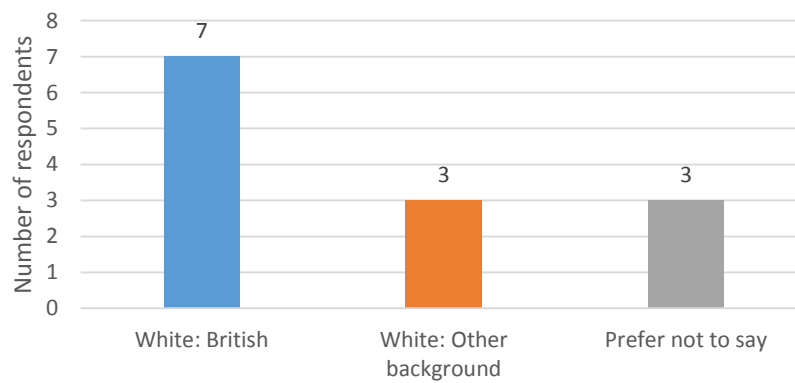
Do you, or anyone living with you, have a disability?



Gender



Ethnicity



1. A Sustainability Appraisal has been undertaken for the issues stage of the Lambeth Local Plan Review. Do you have any comments on the Sustainability Appraisal for the Local Plan Review?

Of the 13 responses received on the Sustainability Appraisal (SA) of the issues and options of the Local Plan Review, six respondents had comments to make on the SA.

Some respondents welcomed that an SA had been undertaken and hoped that it had been widely publicised and circulated so that it was read and understood by the majority of residents. One respondent noted it was pleasing to see the rigour attached to some of the environmental criteria, particularly of alternative options for which developments should be assessed for their impact on air quality, but was disappointed that the reasonable alternatives proposed and assessed for the estates regeneration programme did not include a minimum level of accommodation at council rents, given the negative impact of current policy on deprived communities.

One respondent commented on the SA framework and its prompt questions. In relation to the prompt question on reducing Lambeth vulnerability to terrorist action, the respondent commented that Brixton streets are overcrowded and any incident with a car would have major implications. They also questioned promoting walking as healthy whilst the air quality is so bad, and improving access to libraries whilst closing them down. The respondent also questioned the SA objective of ensuring everyone has 'quiet enjoyment of that home' when there are two flight paths that cross over Brixton, and Lambeth has scaled back noise control teams.

One respondent commented with specific reference to Key Industrial Business Areas, most notably Knollys Yard. The respondent considered that the SA had not considered the impact on existing residents to the change of boundaries or new areas. With regards to Knollys Yard, it was considered that there will be a negative impact on residents not just in Knollys Road and Cameron Place but also York Hill which is unsuited to heavy vehicles on the narrow steep railway bridge. The respondent suggested that a sustainable solution to designating Knollys Yard as a KIBA should be to explore an underpass road connection to Leigham Vale. The respondent would be supportive of a mixed-use development that offers community space and affordable business rates for offices along with housing on the Knollys Yard site.

Historic England commented that they would have liked to see the scoping report alongside the SA report. Historic England made reference to their comments on the Scoping Report 2016, which included suggestions in relation to the baseline evidence, including reference to the work in progress on intervisibility to establish sensitivity in relation to Westminster World Heritage Site. They also recommended reference to characterisation information and a simplified (disaggregated) approach to the historic environment in the SA Framework.

Site	Respondent	Summary of comments	Officer response
St Thomas' Hospital	DAC Beachcroft on behalf of Guy's and St Thomas' NHS Foundation Trust	Must emphasise the need to protect hospitals as they form a significant part of the infrastructure. Revised and emerging policies must protect the existing infrastructure and ensure that future extensions, refurbishments and regeneration of St Thomas' hospital (or any of the Trust's properties) is not stymied in any way. The needs of the hospital must be protected to meet the demands of the borough, London and beyond. This is particularly important given changing demographics (for example, the impact of the provision of services resulting from an ageing population). Consequently, it is important that the Trust is able to adapt and extend the hospital and properties held by it and other properties held by Guy and St Thomas' Charity. It is also important that other developments in the vicinity of St Thomas' hospital does not jeopardise in any way the operation of the hospital. The Trust has a commitment to providing community estates which aim to achieve a smaller number of better quality properties to deliver healthcare and wish to ensure that its objectives are not thwarted by amendments to the Plan.	Noted. The needs of the hospital are considered in the draft Infrastructure Delivery Plan.
Elizabeth House	DP9 on behalf of HB Reavis	HB Reavis is an integrated pan-European developer operating in the United Kingdom, Poland, the Czech Republic, Slovakia and Hungary. Their London development programme comprises four major schemes including the recently acquired Elizabeth House site at Waterloo. Planning permission was granted on the site in 2015 for a major office-led mixed-use development with accompanying enhancements to the	These comments have been considered in drafting the draft revised Local Plan October 2018.

		surrounding public realm and works to alleviate capacity constraints at the adjoining Waterloo Station. Agree with securing supportive and affordable workspace in principle in order to support and grow existing businesses but would like to ensure that any policies to deliver affordable workspace are not overly prescriptive so that such workspace is provided in locations and forms that will genuinely meet a demand. The Local Plan should differentiate between strategic office sites which should generally prioritise larger floorplate traditional open-market commercial buildings, from other sites where the characteristics can better provide affordable workspace without compromising the nature and quality of the open market commercial offer. The characteristics of a site and development proposal should determine whether mitigation through the provision of affordable workspace is required, and if it is, what the best form of such mitigation is. Whilst the involvement of specialist affordable workspace providers is welcomed where such space is to be provided, this should be encouraged rather than required. Developers of commercial schemes should be allowed the flexibility to provide such space in a way that works alongside the open-market floorspace, and this may involve common management or some other form of bespoke solution. Requiring that all providers are chosen by the Council would be an unnecessary step where developers are willing to provide this accommodation. Both affordable housing and affordable workspace should only be sought	
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		where they are required to mitigate the impact of a development. They should be provided in a way that is proportionate to the impact of a development. The particular emphasis should be considered on a site-specific basis, which in some instances will favour affordable workspace over affordable housing where appropriate to the location or context of a development. In general, the recognition that a development can only support a certain amount of subsidy in order to remain viable is welcomed. If it is determined that mitigation in the form of affordable workspace is required by a development, and the nature and scale of that development means that providing the floorspace on-site could be detrimental to the development or the potential affordability and occupiers for that floorspace, than the potential for a financial contribution is welcomed where it would ensure the best outcome. Both on-site provision and financial contribution should be accounted for in the financial appraisal. Whilst there is a pressing need for housing in London and Lambeth, the Local Plan should recognise that single-use commercial schemes remain an important part of London's development pipeline and should be encouraged on certain strategic sites such as Elizabeth House without the need to provide housing. The delivery of high quality commercial led developments on sites such as this are vitally important to Lambeth's economy and ongoing regeneration, as well as to the delivery of key transport infrastructure and new jobs and growth. The Waterloo Opportunity Area provides a significant opportunity to develop a cluster of high quality commercial office buildings in	
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		one of London's most accessible locations, and in so doing deliver substantial benefits to Lambeth's economy. Encourage the land use policies for Waterloo within the Local Plan to support the provision of office-only schemes on certain key strategic sites, such as Elizabeth House, where this is appropriate. In relation to transport, there should be a priority for Waterloo, which should not be limited to capacity improvements, but should also include the provision of a station whose environment, accesses and connections are of a quality and functionality that are fit for purpose and appropriate for London's busiest train station. This is critical for economic growth not just in Lambeth, but also for Central London and the South. Welcome an acknowledgement in the Local Plan that infrastructure funding is likely to become increasingly challenging, and that within a climate of other mounting viability pressures on development, clear priorities will need to be established in relation to each area and site so that development remains viable, and available resources are properly utilised.	
Southbank Centre	Quod on behalf of the Southbank Centre	The South Bank is currently identified as a Strategic Cultural Area in the Lambeth Local Plan, with the objective of promoting, safeguarding and improving leisure, recreation, arts and cultural facilities in the borough. This objective, the current wording of Policy ED11 and its general premise is supported by the Southbank Centre. The comments strongly supported the principles of existing policy PN1, particularly promoting the expansion of arts and cultural activities throughout Waterloo and enhancing the South Bank in its role	Noted

		as an international cultural and leisure centre and a London tourist destination. Support was also given to policy ED11 and its role of safeguarding facilities, which is consistent with paragraph 70 of the National Planning Policy Framework. As the Southbank Centre submits a large number of planning applications for the installation of temporary exhibits, structures and advertisements, the inclusion of stronger policy support for temporary installations that diversify and support the arts and cultural provision would be welcomed by the Southbank Centre, particularly given the continued reduction in Arts Council Grant and the need for alternative funding sources.	
BFI Southbank and IMAX cinema	GL Hearn on behalf of BFI Southbank and IMAX cinema	The Local Plan could go further to include positive proposals and policies aimed at securing opportunities for culture and creative industries within multiuse developments and as stand-alone projects. These policies would reemphasise the contribution of this sector to Lambeth's economy and its role as a tourist destination and centre for local creative industries and attractions, as recognised by the new draft London Plan. The comments also set out that the new draft London Plan emphasises the need for boroughs to positively plan for culture and creative industries, which includes the designation of Creative Enterprise Zones, Cultural Quarters and the development of a Cultural Infrastructure Plan. This is supported by the BFI who commented that this approach would be a positive intervention in seeking to create opportunities for the development of this important sector and should be reflected in Lambeth Local Plan policies.	These comments have been considered in drafting the draft revised Local Plan October 2018.

Waterloo Station	Network Rail	Waterloo Station is a key transport hub linking much of the south and south east of England with Central London. The station, which also includes Waterloo Underground Station, is the busiest by passenger numbers in the United Kingdom. Waterloo Station has recently undergone alterations as part of a desire to improve passenger facilities and amenities at the station. It is envisaged that further major works will be required in the future to address the operational needs of the network and the needs of the passengers. Network Rail requests that a flexible approach is set out to development at the station as it may be necessary to make significant changes to the station in order to deliver the much needed capacity and interchange improvements. Furthermore, Network Rail specifically requests that the new Plan acknowledges the need for Developers of sites near to Waterloo Station to contribute to both mitigation of any impacts as a result of their developments, but also to contribute to improvements to the station and interchange. This can be delivered through S106 Agreements and Community Infrastructure Levy, but must be supported by appropriate policy. For example, the development opportunity offered by Elizabeth House is significant, but it is essential that the development acknowledges its impact and relationship with the station and therefore must respond accordingly through mitigation works and financial contributions. It is hoped to continue discussions on the site with you and the new Developer in order to ensure that way issues are properly considered and addressed.	These comments have been considered in drafting the draft revised Local Plan October 2018.
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Brixton Town Centre	CBRE on behalf of Pagecolt Ltd	Pagecolt Ltd owns a key site within Brixton Town Centre which it is currently considering redeveloping to provide office uses with retail uses on ground floor level. The concept of the emerging London Plan is to promote 'good growth' within London, which is socially and economically inclusive. The emerging London Plan sets out six policies for achieving good growth within London. Policy GG5 relates specifically to growing a good economy, which aims to conserve and enhance London's global competitiveness through diversifying the economy and planning for sufficient employment and industrial space. GG2 sets out a policy framework for creating high-density, mixed-use places that make the best use of land. Options to proactively explore the potential to intensify the use of land to promote higher density development should be explored particularly on sites that are well-connected by public transport. This ambition to intensify development on sites should be taken forward in the Lambeth Local Plan and should be considered as part of the review. Policy ED1 of the emerging Local Plan sets out that increases in the current stock of offices should be supported where there is evidence of sustained demand for office-based employment. The current Lambeth Local Plan also promoted office development in sustainable locations. This element of the Plan is not being reviewed under the current Local Plan Review, therefore the existing policy is supported to ensure that there can continue to be sufficient employment floorspace to support Lambeth as a successful office location. Pagecolt Ltd supports providing higher density development in well-connected locations as this can optimise sites	These comments have been considered in drafting the draft revised Local Plan October 2018.
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		which are sustainable and make sure that brownfield sites are being used effectively. With regards to the provision of affordable workspace, this should be provided on sites where there is demand for such floorspace, and should be provided on a site by site basis based on the site's location and constraints, rather than a blanket approach to provision. A financial contribution should be considered where it can be demonstrated that it is not a feasible solution to provide the space on site or where the site is not located in an area with demand for small spaces, for example in areas outside of town centres, subject to viability. Development opportunities identified in specific area SPDs are also identified within the site-specific chapters of the Local Plan. This ensures that it is clear which sites are considered as suitable for redevelopment by the Council.	
King's College Hospital – Denmark Hill Estate	RPS CgMS on behalf of King's College Hospital NHS Foundation Trust	King's is one of London's largest and busiest teaching hospitals, with a strong profile of local services primarily serving the boroughs of Lambeth, Southwark, Lewisham and Bromley. Their specialist services are available to patients across a wider catchment area, providing nationally and internationally recognised work in liver disease and transplantation, neurosciences, haemato-oncology and foetal medicine. Such services are critical to the welfare and social wellbeing of the local community. King's is one of the country's leading NHS Foundation Trusts. They are a provider of local services, a centre for specialist care and a world-class teaching hospital, and are one of four partners in the	Noted. The needs of the hospital are considered in the draft Infrastructure Delivery Plan.

		Academic Health Science Centre, King's Health Partners, which collaborates on world-class research, driving our vision to become the best medical research campus in Europe. Discussions between King's and the council have advanced considerably since 2016 and this has established a greater imperative to unlock the future development potential of the estate to ensure critical services are enhanced and the medical use of the site improved and modernised. The Lambeth Local Plan (2015) aims to continue to provide and enhance essential local infrastructure, which includes the ongoing reconfiguration of the health facilities of the King's College Hospital site. London Plan Policy 3.16 states that London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure.	
Homebase, 100 Woodgate Drive, Streatham	GR Planning Consultancy on behalf of HHGL	Bunnings is the leading home improvement and outdoor retailer in Australia and New Zealand. The home improvement and garden market sector within the UK and Ireland is growing but is also fragmented and underserved. Bunnings' aim to re-invigorate this market and introduce the Bunnings brand, which has been built on the three strategic pillars of lowest price, widest range and best service. Bunnings acquired Homebase as a platform to build the Bunnings brand within the UK and Ireland and have allocated £500 million to launch this over the next 3-5 years. Bunnings' investment has already commenced with the first	The need for new site allocation policies will be considered in a subsequent Site Allocations Development Plan Document.

		Bunnings Warehouse store in St Albans opening in February 2017. Since then, a further 10 Bunning Warehouse stores have opened. Bunnings employ 12,000 team members within the UK and Ireland, including over 1,500 team members in London and these numbers are expected to grow significantly as Bunnings converts existing Homebase stores and invests in new site opportunities. Bunnings remain fully committed to the Streatham Vale Homebase store. The store is leasehold, with at least 6 years of tenure remaining. Bunnings are looking to include this store within its current investment programme and brand launch. An application to facilitate the works that form part of that investment has been submitted to the council and this investment will secure new employment, as those Homebase stores already converted to the Bunnings brand have seen, on average, a 50% increase in staff numbers.	
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