Respondent reference numbers

R1 London Parks and Gardens Trust	**R13 Guys' and St Thomas' Hospital Trust**
R2 individual	**R14 Unite Students**
R3 Sport England	**R15 individual**
R4 Stockwell Park Residents' Association (amenity Group)	**R16 individual**
R5 Natural England	**R17 individual**
R6 Environment Agency	**R18 individual**
R7 Thames Water	**R19 individual**
R8 Brixton Society (amenity group)	**R20 individual**
R9 Historic England	**R21 Lambeth Environmental Protection Team**
R10 London Hotel Group	**R22 Lambeth Sustainability Team (initial comments)**
R11 Transport for London	**R23 Lambeth Sustainability Team (additional comments)**
R12 transport for London Commercial	**R24 Lambeth highways**
	PPLF Lambeth's Planning Policy Liaison Forum (elected members)

GENERAL COMMENTS – RELEVANT TO ALL PARTS OF DOCUMENT

Respondent no.	Comment no	Comment	Accepted Y or N?	Response
R8	1	Overall, almost all architects, designers and householders will be referring to this document online. It is therefore wasteful and frustrating to find numerous pages marked "intentionally blank" or as section dividers in solid colour.	Y	Accepted. The layout has been revisited given the digital nature of the document and that no hard copies are to be published.
R8	2	Clear illustrations of examples are vital in a document like this, but wherever a range of properties are shown with variations of treatment, it is essential that each example property bears a distinct number or letter for ease of reference. It is also important that illustrations are in agreement with the text. We have found that applicants - and busy planners - tend to refer to the illustrations rather than the text where there is divergence.	Y	Accepted. All the illustrations have been revisited. See also (R15 (2)
R8	3	We must also stress the need for an index, including all relevant building parts and materials.	Y	Accepted. We have provided an index for each Part.
R9	12	It would be helpful to include a bibliography in the document to signpost readers to more detailed guidance specifically. The Building better, Building Beautiful Commission's final report Historic Environment good Practice advice in Planning:3 (2nd edition) The Setting of Heritage Assets Historic England Advice Note 4 tall Building	Y	Part Accepted. We have decided against providing a bibliography given hyperlinks are provided though out the document to all the source documents. We have added more links throughout the document

		Our guidance on Energy Efficiency and Historic Buildings: How to Improve energy Efficiency You may also find helpful Energy Efficiency and Historic Buildings - Application of Park L of the Building Regulations to historic and traditionally constructed buildings., and Energy Efficiency and Historic Buildings: Energy Performance Certificates With part funding from Historic England the Sustainable Traditional Buildings Alliance (STBA) has also published practical guidance on retrofitting traditional buildings on current based on current research and practice: . Planning Responsible retrofit of traditional Buildings		
R10	1	LHG support the delivery of Lambeth's strategic objectives as set out within the Lambeth Local Plan, in particular, achieving economic prosperity and opportunity for all, promoting community cohesion and safe, liveable and inclusive neighbourhoods and creating and maintaining attractive, distinctive places.	N	No change.
R11	1	Given the advanced stage of the draft London Plan in the adoption process, we are strongly supportive of the council referring to the Intend to Publish version when referencing the London Plan in both SPDs. We note that the Mayor has received direction from the Secretary of State regarding the Intend to Publish version and is currently considering his response.	N	No change.

R11	2	We also strongly support Lambeth's strategic objectives of accommodating population growth, tackling and adapting to climate change, providing essential infrastructure and promoting safe, liveable and inclusive communities. To help achieve these, increasing the borough's sustainable transport mode share, decreasing car travel and ensuring the best use of land will play a key role. We therefore particularly support the council's ambition to make walking, cycling and public transport the modes of choice when travelling to and from new developments.	N	No change.
R15	1	I welcome the effort that has gone into making this draft Design Code SPD clear and user-friendly. I support its aspiration and think it will help people making planning application. Particularly useful is the additional information on Policy Q14 given the absence of current guidance. I also welcome the new approach to L-shaped dormers, which will allow local people to stay in their homes by extending them.	N	No change
R15	2a	On a general note, I think it would be helpful if the SPD document could include consecutive page numbers and an index to make it easier to navigate.	N	Part Accepted. As there are 5 documents, the running of consecutive page numbers could become confusing for users. Page references alone would not identify which part of the document was being referred to. We have stuck with numbers for each part. Content would be referred as 'part 2 page 44' of Part 1 para 16 etc.
R15	2b	Also, as a general point, the illustrations (whilst visually impressive) would benefit from more cross-referencing with and greater clarity on what is or is not acceptable.		The illustrations have all been revisited (see also R8 (2)).

R2	1	Should be more recognition of high quality mid century commercial and office buildings across the borough and wharf and industrial buildings typically in the north, several examples of which having been demolished and replaced with mediocre hotel and residential buildings in the past decade.	N	No change. In general terms we don't consider these building types to contribute to Lambeth's character in the broadest sense. Some of the best examples are already designated for example Shell centre is locally listed, IBM is Grade II listed.
R22	1	Local Plan was expected to be adopted in early 2021 – any update? Is this dependent on the London Plan?	N	No change.
R22	2	Design Review Panel – status and members? Is there sustainability/ climate change expertise included?	N	No change.

PART 1 – INTRODUCING LAMBETH

Respondent no.	Comment no	Comment	Y or N?	Edit
R1	1	We find para 1.22 unhelpful. "New development in Registered Parks and Gardens and within conservation areas should cause no harm." New development should also enhance Registered Parks and Gardens.	Y	Part accepted. We have amended the text by removing the policy requirements in what is now the latter part of para. 1.60 P ~~'New development in Registered Parks and Gardens and within conservation areas should cause no harm. The original designation information and character appraisal (where available) for conservation areas should be consulted to inform the design approach. The demolition of buildings which make a positive contribution to conservation areas is not supported. New designs should:~~ Development affecting registered parks and gardens and conservation areas should: 1. Be respectful of prevailing heights and building lines, 2. use materials which integrate the new development into its historic context; and 3. irrespective of the chosen architectural style, have architectural rhythms and forms which reinforce the established positive character / local distinctiveness. 4. Respect established landscape features of value 5: Ensure lighting schemes cause no harm. Historic England provides guidance on issues to be considered when designing and installing external lighting to illuminate a historic structure or building and its surroundings. See link: https://historicengland.org.uk/advice/technical-advice/building-services-engineering/external-lighting-of-historic-buildings/'
R1	2	Furthermore, adverse impacts on parks and open spaces are as likely to arise from	Y	Accepted. See response to R1 comment 1

		development outside the park boundary and the opportunity of a design SPD allows for detailed guidance to be provided to developers. For example, lighting, views, scale and massing, materials.		
R9	1	Section starting paragraph 1.10 Lambeth's character – it would be helpful to mention the iconic brutalist architecture along the Southbank in this section (on potentially in Annex 1) as a key part of Lambeth's nationally recognised character.	Y	Accepted we have added paragraph: para 1.56 'Along the South Bank there is an exceptional group of post-war buildings which are fine examples of Brutalist architecture. Royal Festival Hall, Queen Elizabeth Hall, and the Hayward Gallery complex, designed with reinforced concrete and horizontal lines are a landmark cluster of cultural buildings on the South bank of national significance.'
R9	2	Paragraph 1.23 (final version 1.18) – A link to the WWHS's Statement of OUV could be added here to direct readers to its key attributes. Reference should also be made to the Westminster World heritage Site management Plan (currently being revised).	Y	Accepted. We have added links in the Westminster World Heritage Site section to what is now para 1.18 'The 'Statement of Outstanding Universal Value', sets out the qualities and characteristics of the WWHS which make it internationally important. See link: http://whc.unesco.org/en/list/426/ Detailed information on management of the site can be found in the World Heritage Site Management Plan. See link: https://www.westminster.gov.uk/sites/default/files/westminsterplan-1374853002.pdf
R10	2	In respect of Part 1 of the Draft Design Code SPD, LHG support the objective for design excellence in Lambeth to ensure	N	Noted. No change.

		that new development is well-built, responsive to context and visually attractive.		
R11	5	We strongly support reference made to the Intend to Publish version when referring to the London Plan in this document. We also strongly support Lambeth's strategic objectives of accommodating population growth, tackling and adapting to climate change, providing essential infrastructure and promoting safe, liveable and inclusive communities. This emphasises the importance of increasing sustainable transport, decreasing car travel and ensuring the best use of land within the borough.	N	Noted. No change.
R12	1	The design process - Paragraph 1.31(final version 1.70) states that new development in Lambeth must be responsive to context (fits in rather than stands out). Whilst the sentiment of the point is acknowledged (that developments should be responsive to local context) it is considered that the wording "fits in rather than stands out" is unnecessary and not in line with paragraph 127 (c) of the NPPF which states that development must be "sympathetic to local character and history … while not preventing or discouraging appropriate innovation or change".	N	Noted No change. It is not considered that the term 'fits in' is in conflict with the guidance in the NPPF

R15	3	The Lambeth's Character Section (1.10) (final version 1.37) shows only to residential character. It might be useful to include other character areas such as town centres.as they are part of the character of Lambeth too.	Y	Accepted. We have added bullet point c) to what is now para 1.37 'Town centres which tend to be retail, business and leisure dominated, and long established often containing concentrations of heritage assets'
R15	4	Paragraph 1.29 talks about small sites and encourages "Residential conversions, redevelopment, Residential conversions, redevelopment extensions of houses" within PTALs 1-6. This should this be PTAL **3**-6 to accord with London Plan Policy H2.	Y	Accepted. This error has been corrected in what is now para. 1.30 bullet 2.
R15	5	Paragraph 1.30 Development in residential gardens / small sites is going to be very challenging for many local people to accept. It may be worth making reference to Paragraph 4.2.8 of the Draft London Plan: *"Small housing developments are envisaged to be within close proximity to existing homes. These should be carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy, for example through the*	N	Not accepted. In order to keep this document, brief it would not be appropriate to directly quote the London Plan wording.

		placement and design of windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve good design and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight. All homes must meet the housing standards in Policy D4 Housing quality and standards, including the provision of private open space."		
R22	3	Challenges Para 1.5 Can we include an introduction paragraph on climate change as a cross-cutting consideration for the whole design code?	Y	Accepted. We have added additional text to Para 1.5 '… ….In response to the significant threat posed by climate change, Lambeth Council declared a climate emergency in January 2019. 1.6 Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. Planning policy and decision-making can make a significant contribution to reducing carbon emissions (mitigation), through its influence over spatial planning, the energy performance and design of new development, transport, and green infrastructure. It can also play a key role in

				preparing people and places for the consequences of climate change (adaptation). The main impacts of climate change in Lambeth are likely to be: • warmer, wetter winters • hotter, drier summers (which may be especially hot in dense urban areas) • more frequent extreme rainfall events, leading to greater risks of flooding • possible intensification of the urban heat island effect • increased greenhouse gas concentrations, leading to greater air pollution.
R22	4	Key relevant policies of the DRLLP PSV Jan 2020: Can we include references to Policies EN3, EN5 and EN6? Section 14 of NPPF for EN5 and EN6 Draft London Plan - Ch 9. London Plan SPG - Sustainable Design and Construction (2014)	Y	Accepted. We have amended Planning Policy Context table on page 7
R22	5	Lambeth's Character after 1.14 (final version 1.32) Can we add something about energy performance / key challenges in terms of climate change mitigation and adaptation? This will increasingly be a challenge we need to deal with over the coming decade so we need to have a clear stance and clear guidance to support retrofit in appropriate ways	Y	Part accepted. Detailed advice on these matters is found elsewhere in the SPD. However, a reference is included in additional text added to Para 1.5. See also response to R22 3

R22	6	Design Excellence Can we include the mitigation and adaptation of climate change? e.g., 2. well-built could include affordable heat, energy efficient, low carbon?	Y	In what is now para. 1.70 a new bullet point has been added: 5 Sustainable (with low embedded emissions, highly energy efficiency, and low carbon heating systems) and 6 resilient (to heat, flooding, and other climate change impacts)
R22	7	1.31 Design excellence should include a requirement to maximise environmental benefits and minimise negative impacts. Can we also state that any development should be consistent to net-zero standards as reasonably possible?	Y	Agreed. See response to R22 comment 6
R23	1	1.5 ADD FIRST SENTENCE: Tackling the climate emergency by reducing emissions from buildings and transport and making the built environment resilient to future climate change is a major local challenge.	Y	Accepted. New first sentence added at para 1.5: Tackling the climate emergency by reducing emissions from buildings and transport, and making the built environment resilient to future climate change is a major local challenge.
R23	2	1.5 ADD SENTENCE: Air pollution remains at dangerous levels across the borough, with legal limits regularly exceeded with significant impacts on public health.	Y	New second sentence added to para 1.5: Air pollution remains at dangerous levels across the borough, with legal limits regularly exceeded with significant impacts on public health.
R23	3	1.8 ADD SENTENCE: Also evident is the significance of climate change as a cross-cutting issue facing the planning system, both in the need to ensure resilience to growing threats like flooding and extreme heat, and the need to limit further emissions.	Y	Accepted. We generally try to avoid direct quoting policy in guidance as otherwise it can get too wordy. However, a new third sentence has been added to what is now para 1.10: Also evident is the significance of climate change as a cross-cutting issue facing the planning system, both in the need to ensure resilience to growing threats like flooding and extreme heat, and the need to limit further emissions.

		"A responsible city must limit its impact on climate change while adapting to the consequences of the environmental changes that human behaviour is already creating…These environmental threats are real and present, and London must be prepared for them." 1.6.1-1.6.3, London Plan 2021		
R23	4	Table on page 7 - Rename Sustainable Design and Construction as "Sustainability"	Y	Accepted. Policy area title has been amended in left column: ~~Sustainable Design and Construction~~ 'Sustainability'
R23	5	Table on page 7 - Add "Section 9, 14, 15" to NPPF column for Sustainability	Y	Accepted. ~~Added to NPPF column -~~ Section 9, 14, 15
R23	6	Table on page 7 - Rename "London Plan SPG" to "London Plan LPG"	Y	Renamed "London Plan SPG and LPG"
R23	7	Table on page 7 - Under London Plan LPG" column, reference: Air quality positive LPG (draft) Be Seen energy monitoring LPG Circular economy statements LPG (draft) Energy Planning Guidance The control of dust and emissions in construction SPG Whole life carbon LPG (draft) Air quality neutral LPG (draft)	Y	The following have been added Air quality positive LPG (draft) Be Seen energy monitoring LPG Circular economy statements LPG (draft) Energy Planning Guidance The control of dust and emissions in construction SPG Whole life carbon LPG (draft) Air quality neutral LPG (draft)
R23	8	Table on page 7 - Under Lambeth Local Plan column, reference: EN1-7 & T1-3	Y	Added under Lambeth Local Plan: EN1-7 & T1-3

R23	9	1.12 – can the following standards be included: Net Zero Carbon Buildings: A Framework Definition https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition/ LETI Climate Emergency Design Guide https://www.leti.london/cedg		The following have been added: Net Zero Carbon Buildings: A Framework Definition https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition/ LETI Climate Emergency Design Guide https://www.leti.london/cedg
R23	10	ADD NEW PARAGRAPH (AFTER 1.11) (final v 1.38): The most prevalent building type in Lambeth is a pre-1900 terraced house, and over half of domestic floorspace in Lambeth is in buildings constructed before 1929. Such buildings typically have poor levels of energy efficiency, and facilitating the decarbonisation of this building stock will be essential for Lambeth's efforts to tackle the climate emergency, given that energy use in the home is the single largest source of emissions in the borough.	Y	New para has been added . This is now para. 1.38: 1.38 The most prevalent building type in Lambeth is the pre-1900 terraced house, and over half of domestic floorspace in Lambeth is in buildings constructed before 1929. Such buildings typically have poor levels of energy efficiency. Facilitating the decarbonisation of this building stock will be essential for Lambeth's efforts to tackle the climate emergency, given that energy use in the home is the single largest source of emissions in the borough.
R23	11	ADD NEW PARAGRAPH (AFTER 1.22): Taking steps through sustainable design to tackle the climate emergency and ensure resilience to future climate change is essential to ensuring that future	Y	New paragraph has been added: 1.60 Taking steps through sustainable design to tackle the climate emergency and ensure resilience to future climate change is essential to ensuring that future generations can continue to enjoy Lambeth's heritage assets.

		generations can continue to enjoy Lambeth's heritage assets.		
R23	12	Para 1.28 ADD: "[We must accommodate growth to deliver much needed homes and workspaces, while supporting local communities] and preserving, enhancing and expanding greenspace and greenery.	Y	Accepted. At para 1.28 The second sentence has been amended to read: We must accommodate growth to deliver much needed homes and workspaces, while supporting local communities and preserving, enhancing and, where possible, expanding greenspace and greenery.
R23	14	Para 1.32 ADD TO BULLET POINT 1 "sustainability specialists"	Y	Accepted. Para 1.71 Added: 1 sustainability specialists
R23	15	Para 1.34 ADDED TO BULLET POINT 4 air quality	Y	Accepted. Added: 4 air quality
R23	16	Annex para 1.6 - ADD TEXT: Terraced houses from this era are typically solid wall construction, with poor levels of energy efficiency. Improving the fabric performance of these houses - the most prevalent building type in Lambeth - is a priority for the borough's response to the climate emergency,	Y	Accepted. Additional text added at what is now para. 1.54 : Buildings from this era are typically solid wall construction, with poor levels of energy efficiency. Sympathetically improving their fabric performance is a priority for the borough's response to the climate emergency.
PPLF	12	Para 1.61 - Can we more strongly encourage pre-app engagement with local communities?		New bullet point added at what is now para. 1.62: '6. Consider meaningful engagement with the local community at pre-application stage. For further guidance on this matter see Part 4 of Lambeth's Statement of Community involvement (SCI), 2020.

PART 2 – DESIGN ADVICE FOR ALL DEVELOPMENT

Respondent no.	Comment no		Y or N ?	Response
R3 Sport England	1	**Health and wellbeing – Active Design** I note within the document it states that public health in Lambeth is significantly behind England on a significant number of indicators. The document goes on to say that residents' wellbeing and health are a priority, and encourages creating inclusive environments which make a positive contribution to health and well-being. Sport England believes this would be further facilitated by specifically referencing Sport England's Active Design Guidance within the SPD, with the recommendation that future design proposals follow its principles. http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design	y	Accepted. Anew section called 'Active Environment' has been created. See paragraphs 2.7 and 2.8 of the revised draft.
R5 Natural England	1	This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should ' *take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; '*. The Planning Practice Guidance on Green Infrastructure provides more detail on this.	Y	Accepted Amend from Para 2.78. '2.78 Green Infrastructure (GI) is the use of ecosystems, green spaces, and water to deliver environmental and quality of life benefits. For communities, these benefits can include enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production. It also contributes to urban cooling, climate change mitigation and adaptation, natural disaster risk mitigation, protection against flooding and erosion as well as biodiversity conservation. Green infrastructure should be optimised in all schemes.

		Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".		2.79 The Lambeth Green Infrastructure Strategy 2018 sets out an approach for managing, enhancing and creating new open space and green infrastructure. Green infrastructure encompasses a range of spaces and assets that provide environmental and wider benefits. In Lambeth these include parks, open spaces, trees and woodland, green roofs, green walls, rain gardens, swales, planted landscape including shrubs, wildflowers etc., private gardens and squares and allotments. It also includes 'blue infrastructure' such as streams, ponds and other water bodies. https://www.lambeth.gov.uk/sites/default/files/pl_Lambeth_Green_Infrastructure_Strategy_Update_October_2018.pdf 2.80 Urban greening provides the opportunity to achieve many of the positive benefits brought about by green infrastructure within the existing fabric of the urban area without the need for significant tracts of open undeveloped land. Commonly used urban greening measures include: • Street Level – street infills, reallocation of road space, pocket parks, roadside verges, incidental spaces and street trees; • Raised Street Level – planters and green walls; and • Roof Level – living roofs, accessible green roofs and blue roofs. 2.81 The Lambeth Green Infrastructure strategy 2018 sets out a number of ways green infrastructure delivery can be optimised in Lambeth. Primarily major developments provide the main creation of new open space and other green infrastructure assets, particularly with the application of the urban greening factor required by the London Plan (see para 2.66). Retrofitting urban greening features, such as green walls

				and roofs can be limited by technical issues. It is therefore important to consider green infrastructure at the pre-application stage. 2.82 The strategy also highlights small opportunities to create green space, 'reclaiming' street space, pedestrianisation or where footfall is low provide opportunities for areas of urban greening, pocket parks and playspace. They also provide an opportunity for multiple micro-scale urban greening benefits to be delivered (e.g. street trees, plus planted filter strips allied to permeable paving to help with run off/groundwater recharge). Such interventions will clearly require careful coordination with the management of streets and highways. 2.83 Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity". https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=34c44ebf-e1be-4147-be7d-89aaf174c3ea
R5	2	You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.	Y	Part accepted. This is already addressed in para 2.77 which references the urban greening factor calculations. Para 2.87 provides guidance on Sustainable Drainage Systems which has been amended please see response to R22 comment .Para 2.32 provides guidance on air quality. However, we have supplemented the existing content by including a new section on Green Infrastructure and Biodiversity. See response to R5 comment 1 and 3. There are also additions amendment to air quality for all new development Para 3.7. See response to R22 comment 8.
R5	3	**Biodiversity enhancement** This SPD could consider incorporating features which are beneficial to wildlife within development, in line	Y	Accepted. We have supplement information with new paragraphs from 2.71 referencing the Lambeth Biodiversity Action Plan:

		with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.		2.71 Policy EN1 seeks to protect and enhance local biodiversity. Lambeth is rich in wildlife and provides a home for an astonishing diversity of wild plants and animals. Lambeth is full of all the places (habitats) that wildlife needs for shelter, feeding and breeding. This includes, gardens, parks, ponds, trees, woodlands, community gardens, school grounds, allotments and railway linesides, not to mention the River Thames. 2.72 The Lambeth Biodiversity Action Plan (Lambeth BAP) provides guidance to landowners and developers of land on the various types of enhancements for biodiversity that will be expected of them on land they currently own or on any proposed new developments. 2.73 The Lambeth BAP identifies a number of priority habitats for the borough and describes a set of realistic objectives and where appropriate, achievable targets. Each priority habitat also recognises any important species that benefit from such habitats and their protection and positive management. The priority habitats in the Lambeth BAP, which action plans are developed for, will be: a) the built environment, b) parks and public open spaces (including cemeteries and churchyards); c) private gardens and growing spaces (including allotments and community gardens); d) railway linesides; e) rivers and standing water; f) the tidal Thames; g) trees and woodlands. For further advice see the Lambeth Biodiversity Action Plan link: https://www.lambeth.gov.uk/sites/default/files/lpl-lambeth-biodiversity-action-plan-2019-20.pdf

				The Partnership for Biodiversity in Planning's free pre-planning tool for smaller developers. See link: https://www.biodiversityinplanning.org/wildlife-assessment-check/ 2.74 The Built Environment Habitat Action Plan for Lambeth objectives are: • Produce a database and map of 'opportunity areas' where improvements can be made to the extent and quality of biodiversity within Lambeth's built environment, especially within areas currently deficient in terms of quality natural greenspace or access to nature. • Secure exterior landscaping design proposals for developments which include features to protect and improve biodiversity in line with current best practice. Priority is given to existing areas of deficiency for access to nature. • Ensure that all developments within the borough, wherever feasible, include living roofs and walls in line with Lambeth Local Plan Policies EN1 and EN4. • Ensure that species of conservation concern living in and depending on the built environment, such as swifts and black redstarts, are afforded appropriate protection from harm or loss of nesting/feeding habitat, and opportunities to prove additional or new habitat are provided within new and existing buildings or other aspects of a proposed development.
R5	4	**Landscape enhancement** The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity		Accepted. Para 2.87 added to point 3: 3. Design in a manner that is sustainable in relation to trees for the long term. This includes ensuring proposed buildings are sufficiently far away to accommodate tree growth as well as ensuring sufficient separation to guard against adverse impacts on building occupiers which might lead for calls to prune or fell the tree. The species selection for new tree planting requires careful consideration to minimise future problems and to ensure that the chosen species is capable of thriving on the planting

		assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.		site. Specific guidance relating to species selection can be found on the Trees and Design Action Group website: http://www.tdag.org.uk/uploads/4/2/8/0/4280686/tdag_treespeciesguidev1.3.pdf
R5	5	**Other design considerations** The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	Y	Accepted we have added new para under Biodiversity. 2.96 External lighting can be extremely disturbing to a variety of plants, birds, fish and other animals. Excessive light can impact on the lives of nocturnal species such as bats, owls, and insects, confusing their patterns of sleep, feeding, hibernation and thus endangering them. It is an offence to disturb protected species such as bats. The Bat Conservation Trust and the Institution of Lighting Professionals provides detailed advice. See link https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229
R6 Environment Agency	1	**Biodiversity** We welcome the section on urban greening and biodiversity, and particularly the promotion of SuDS for flood risk mitigation. We would suggest this section could be strengthened by including some guidelines on planting to include pollinators, the use of native species and the creation of semi-natural habitats within a local context. For example habitat types suitable near main rivers. The	Y	Accepted. Add following text Planting and species choice 2.88 Planting schedules are usually required as a condition of planning applications. The role of planting varies from development to development. However, along with considerations of robustness, maintenance and attractiveness, it's role in the wider ecosystem of the region must be a priority. For example, native species which have been

		SPD could also reference the emerging requirements for biodiversity net gain.		grown locally should be the first choice for landscaping. Planted areas need to address the current biodiversity emergency by aiming to create areas of semi-natural habitat with native flowering species to support insect and bird populations. London policy on biodiversity net gain should be used to guide landscape design. This is especially relevant when large areas of landscaping will be provided. https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf
R7 Thames Water	1	Thames Water support the proposed references to the use of SuDS in Section 2 which can help to reduce the risk of flooding and can help with ensuring that the sewerage network has capacity for a growing population.	N	Noted
R7	2	Thames Water also support the references to tree planting within Section 2, however, within the public realm care needs to be taken to ensure that planting does not adversely impact on below ground water and sewerage network assets.	Y	Accepted. Add additional text to para 2.68 2.85 Trees offer many benefits visual amenity, softening the built environment, adding maturity to new developments; displaying seasonal change, providing opportunities for wildlife in built-up areas, making places more comfortable by contributing screening, reducing wind speed and turbulence, intercepting snow and rainfall; and reducing glare. Trees are also importantly contributing to urban cooling through evapo-transpiration and providing microclimatic effects (shading) that can reduce energy demands in buildings. Care should be taken to ensure that planting (and tree growth) does not adversely impact on below ground water and sewerage network assets.
R8	4	**Sustainability in Construction and Use** A major omission from this Design Advice is any overall consideration of sustainability or wider environmental issues. There are only subsidiary notes under specific sections (paras 3.9, 4.107 and 5.79).	Y	Accepted. A whole new sustainability section has been created in Part 2 entitled 'Urban Greening and Biodiversity'. Para. 2.71 onwards. There is also

		In environmental terms, the "greenest" building is the one that already exists. The embodied energy in existing structures should be taken into account before embarking on demolition – adaptation and re-use are preferable to new construction, minimising the generation of carbon dioxide during construction and in use.		additional content in the other parts of the SPD. Para 3.9 moved to this new content.
R8	5	**Inclusive Environments** (paras 2.1-2.6) This section is welcome, though it is disappointing that such elementary requirements need to be re-stated.	N	No change
R8	6a	**Privacy & Overlooking** (paras 2.10-2.13) A continued weakness of Lambeth's planning policies is the lack of clear guidance about separation distances and angles between facing windows in different properties, particularly for residential accommodation. Other boroughs have clearer guidance.	Y	No change. Lambeth's policy does not include separation distances. Given the great variety in circumstances across the borough it is not considered possible to have a 'once size fits all' approach to these matters. The guidance in the document will allow designers to have a full understanding of the issues allowing them to respond to each circumstance on a case-by-case basis taking into account site-specific considerations.
	6b	It is disappointing that the matter of separation distance is only mentioned in terms of Outlook (para 2.14, point 2) from the point of view of the overlookers, ignoring those being overlooked.	Y	Accepted. Text has been clarified: 2.14 Overlooking requires careful consideration. Direct overlooking in close proximity between residential units <u>or into amenity spaces and gardens</u> is rarely acceptable and should be avoided through good design. In some cases the Council may also use planning conditions to guard against overlooking. These might include conditions which require: 2.15 <u>Overlooking and the perception of overlooking is important because no one should feel uncomfortable in their living spaces and amenity spaces. In urban areas total privacy in outdoor space is unlikely where</u>

				possible occupants should have some degree of privacy. Designers need to be mindful that sometimes the appearance of a building can exaggerate the perception of overlooking. For example, the provision of large areas of glazing, even if obscured, can give a misleading affect. Any such adverse perceptions should be anticipated and addressed at design stage.
	6c	For dwellings close to entrances and walkways, privacy needs to be addressed at the design stage, for both new buildings and conversions. If the residents have to improvise their own arrangements, the results are often unsightly.	N	No change. This is already addressed in Para 2.12 and 2.13
R8	7	**Sense of Enclosure** (para 2.17) This paragraph is too vague to offer practical guidance to designers. Sense of Enclosure is often cited as a reason for refusal which is then difficult to challenge for householder or infill developments, but for large-scale developments with better resources, these generalities are too easy to brush aside at appeal.	Y	Accepted. Text has been amended to clarify outlook and sense of enclosure at 2.16 **Outlook** 2.16 Reasonable outlook is important for all residents ~~whether~~ from within their homes, ~~or when using private amenity spaces.~~ Reasonable outlook from habitable rooms is a key contributor to residential amenity and quality of life for everyone. Outlook expectations will differ from suburban and urban locations; as it is relative to the surrounding context. Outlook may include sense of enclosure and the spatial quality of what is visible. Designers should: Changes have also been made at 2.19 **Sense of Enclosure** 2.19 Openness is an important quality for outdoor space, gardens with an undue sense of enclosure may have other consequences (such as on daylight and sunlight). The sense of enclosure experienced by residents is dependent on a combination of factors – the proximity of

				development, its height and treatment. It is closely related to issues such as overlooking (and the perception of overlooking), outlook; and daylight and sunlight. The sense of enclosure caused by new development ~~on an existing room is normally assessed from the window of that room; whilst the sense of enclosure~~ on a garden or amenity space is considered 'in the round' as experienced by the user of that space.
R8	8	**Noise & Vibration** (paras 2.26-2.28) Noise is a growing problem because of increasing density and the Council's inability to apply or enforce such policies as exist. Too often it is blinded by the size of the CIL "bribe" or the quantity of dwellings being provided, while ignoring their quality. We fully agree with the points in para 2.28, but clearly these are not being applied in practice. Other correspondents have cited the deficiencies of the (second) redevelopment of the Myatt's Fields North Estate. In point 5, the Council has encouraged provision of business space at ground floor level below residential developments, but this can generate vehicle movements and other servicing operations beyond the normal working day, to the detriment of residents' amenity.	N	Noted.
R8	9	**Odour and Air Quality** (paras 2.30 & 2.31) Considering the proliferation of applications for A3 and A5 uses, it seems a wasted opportunity that more guidance on good practice is not provided here.		Accepted. We have amended text and inserted direct links to council guidance after Para 2.31. Amended text to Para 2.32

		The SPD should include direct links to the relevant guidance on: - Environmental standards for commercial extract ventilation; - Refuse storage (poor indexing makes this difficult to locate). Insufficient guidance is provided on refuse and recycling storage for shops, cafes and other commercial uses.		2.31 Commercial kitchens will be required to meet the relevant environmental standards for flues and extracts. Extract equipment should be kept away from noise and odour sensitive locations. One of the most common issues with odour in new development is from communal refuse stores (domestic and commercial). Close proximity of refuse stores to dwellings is a particular concern and the impact of odour needs to be addressed. Where refuse stores are within buildings doors should have seals and closers and the spaces should have mechanical ventilation to draw odour out and away from dwellings and amenity spaces. For more information on refuse storage please see the Council's refuse and recycling storage guidance document. **Air Quality** 2.32 Air pollution is a significant public health hazard. This is particularly the case for young, old or vulnerable people, but everyone is at risk from exposure to pollution. Lambeth is a designated Air Quality Management Area due to exceedances of national air quality objectives for nitrogen dioxide (NO2) and particulate matter (PM). Key sources of air pollution include on- and off-road vehicles, gas boilers and industrial fuel combustion. New development should design for reduced exposure of receptors to new and existing sources of pollution, and minimised emissions from introduced sources, through mitigation on-site as a priority. The Lambeth Air Quality Guidance Note (GN) sets out the Council's advice for reducing emission of and exposure to air pollution. Link below: https://www.lambeth.gov.uk/sites/default/files/pl-lambeth-air-quality-planning-guidance-note.'
R8	10a	**Outdoor Space** (paras 2.39-2.65)	Y	Accepted. The advice has been re-written. It is now at para 2.43 point 4:

		In para 2.40, point 2 should be rewritten in plain English.		'2. ~~Crime and anti-social behaviour acerbated to poor design. (see para 1.67)~~ 4. Poorly designed places become a maintenance and management burden.
R8	10b	In para 2.43 point 5, siting car parking directly below trees is not a good idea due to resulting deposits from birds and from certain tree species.	Y	Part accepted. The urban shading benefits of trees are considered to outweigh the disadvantages. Therefore we have retained the original text (now. At 2.47 point 5. However, it is agreed that careful species selection is necessary. Para 2.87 add point 3: 3. Design in a manner that is sustainable in relation to trees for the long term. This includes ensuring proposed buildings are sufficiently far away to accommodate tree growth as well as ensuring sufficient separation to guard against adverse impacts on building occupiers which might lead for calls to prune or fell the tree. The species selection for new tree planting requires careful consideration to minimise future problems and to ensure that the chosen species is capable of thriving on the planting site. Specific guidance relating to species selection can be found on the Trees and Design Action Group website: http://www.tdag.org.uk/uploads/4/2/8/0/4280686/tdag_treespeciesguidev1.3.pdf
R8	11	**Urban Greening and Biodiversity** (paras 2.66-2.71) In para 2.70, designers should be reminded that trees grow and may eventually deteriorate. Future access may be needed for tree surgery or even removal. For new tree planting, the choice of species is critical to minimise future problems, and it would be helpful to	Y	The paragraph (now Para 2.87) has been amended to read: 1. Respect the limitations posed by existing trees ensuring development is placed sufficiently far away to ensure root protection (free from buildings, construction activity, utility services and hard standing); and taking into account access for future tree care / tree removal and potential tree nuisances for future occupiers. These can include leaf/fruit

		add a reference to suitable guidance, e.g. from the Trees and Design Action Group.		drop, sticky sap/residue and the over-bearing presence of large trees in very close proximity. For tree planting see response to R8 comment 10b.
R10	3	LHG recognise that Lambeth has a diverse and evolving population which will require inclusive design to support the relationship of a new development with the wider built environment. LHG support the need to protect the amenity of those who live, work and visit Lambeth in respect of Part 2 of the Draft Design Code SPD.	N	No change.
R11	3	We broadly support the guidance provided to ensure the quality of car and cycle parking delivered in new developments. Explicit reference to the car and cycle parking standards set out in both the draft London Plan and Lambeth's draft revised Local Plan would be a helpful addition to emphasise that developments should not exceed the permitted level of car parking and should provide the correct levels of high quality cycle parking provision.	N	Accepted. Paragraph 2.48 contains a link to London Plan parking standards.
R11	4	A reference to forthcoming TfL/GLA guidance on parking design and management would also help achieve design that creates safe and convenient environments for people walking and cycling.	Y	Accepted. In the absence of the guidance, extra links have been provided at 2.47 https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf
R11	6	**Inclusive Environments** We support requirements for Blue Badge parking spaces to be located near building entrances so that they are easily accessible.	N	Noted.
R11	7	**General Principles -** **Outdoor Space – Public Realm** We welcome reference to the Healthy Streets Approach in this section and	Y	A link to Healthy Streets Toolkit is embedded beneath para 2.41 which includes the Healthy Streets wheel.

		putting human health at the heart of city planning by encouraging more walking and cycling. The Healthy Streets wheel in Appendix B may be a useful addition to illustrate the healthy Streets Indicators that should be considered when designing the public realm surrounding developments. We also note that 'Healthy Streets Approach' should be capitalised.		2.41 Lambeth's public realm must be fit for purpose if it is to serve a growing population. A successful accessible and inclusive environment is one that everyone can benefit from by being able to move through and enjoy, independently and uninhibited. This aligns with the Healthy Streets ~~approach~~ Approach in the Mayors Transport Strategy (2018) which aims to put human health at the heart of city planning by encouraging walking and cycling. Link to Health Streets Toolkit below: http://content.tfl.gov.uk/healthy-streets-for-london.pdf
R11	8	**General Principles -** **Outdoor Space – Public Realm** We welcome the approach to minimise space dedicated to vehicular movements, designing out opportunist parking (e.g. on side verges) and maximising space dedicated to walking and cycling, which is in line with the approach taken in both the Mayor's Transport Strategy and draft London Plan.	N	No change
R11	9	**General Principles -** **Outdoor Space – Surface** **Parking** We agree with guidelines provided to designers for surface parking such as clearly demarcating pedestrian routes, raising kerbs to footways to guard against opportunist parking, using soft landscaping and urban greening to reduce the appearance of vehicle dominance.	N	No change
R11	10	**General Principles -** **Outdoor Space – Surface** **Parking** However, we would encourage guidelines that discourage general car and vehicle parking immediately outside developments as these encourage car use over other modes—facilities for walking, cycling and public transport should be prioritised over car storage. We would also	Y	Accepted. This issue is addressed under 2.44 bullet point 5. Minimise space dedicated to vehicular movements, maximise space dedicated to walking and cycling and design out opportunist parking. We have supplemented with under Surface Parking paragraph 2.47 bullet point 1: 2.47 Designers should 1. Prioritise pedestrian comfort and residential amenity over convenience for motorists when locating carparking

		welcome reference to the parking standards set out in the London Plan and/or draft Lambeth Local Plan to reinforce the need for developments to not exceed the maximum number of parking spaces permitted		
R11	11	**General Principles - Outdoor Space – Retail / Commercial Forecourts** We support design principles to eliminate non-essential parking and designing out opportunistic parking, prioritising pedestrian movement and safety, and policies to ensure the quantity and quality of cycle parking and storage areas. We would also encourage design measures that place walking and cycle facilities near the entrance of retail and commercial spaces, prioritising the needs of people walking and cycling over those using private vehicles.	Y	Accepted. Added new bullet point to what is now para 2.51 2.52 When designing forecourts designers should: 2. Prioritise design measures that place walking and cycle facilities near the entrance of retail and commercial spaces, prioritising the needs of people walking and cycling over those using private vehicles.
R11	12	**General Principles - Outdoor Space – Front gardens / defensible space** We welcome guidelines to prevent against opportunistic parking and using boundary treatments or hedging to screen vehicles. However, we would encourage guidelines to discourage vehicle parking in front gardens where possible.	Y	Policy Q14 is very clear on how the Council approaches front garden parking. It is not considered necessary to replicated it here however we have added extra text to 2.56 Designers should: 2. Optimise soft landscaping to enliven the frontage and aid sustainable drainage. When converting existing properties or providing policy compliant parking proposals should retain soft landscaping and preserve the amenity value of front gardens

R11	13	**Cycle Storage –** We strongly support the design guidelines for cycle storage referencing the London Cycle Design Standards and guidelines to ensure five per cent of all cycle parking is allocated for larger cycles including those adapted for disabled users. However, we would also encourage the council to reference the draft London Plan standards and the quality guidelines set out in their draft revised Local Plan. This will help ensure that developments provide the correct levels of high-quality cycle parking provision to meet current and future demand.	Y	Add reference to draft London plan standards and cross reference to guidelines in draft revised Local Plan. Add to Para 2.118 under bullet points. For further information, please refer to the London Plan which sets out cycle parking standards under Policy T5. See Link: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf The Lambeth Local Plan also provides quality guidelines set out under Policy Q13. See link: https://www.lambeth.gov.uk/sites/default/files/co-draft-revised-lambeth-local-plan-october-2018-final.pdf
R13	1	We note that the Draft Design Code SPD – Part 2 contains a section on Outdoor Space and offers guidance for the design of the public realm. Within this section, it is acknowledged that opportunist car parking on pedestrian spaces, verges and footways can block routes for emergency vehicles. The guidance states that this should be anticipated and addressed at design stage. The Trust is supportive of this inclusion in the document, however more could be done in other sections of the document to ensure that emergency vehicle access is always considered when looking at site layout and access generally. The SPD also does not fully explore this common issue or provide specific design guidance on how to mitigate this problem. It is essential that provisions for emergency vehicle access, not just limited to preventing blocking access, are implemented at the design stage in order for healthcare services to continue to operate optimally.	N	Not accepted. No change. The existing reference is considered adequate for the purposes of this document. Compliance with highways regulations and other transport considerations will be accessed against national regulation and we don't consider that it requires further elaboration. The need for emergency access for new development is covered in other policy e.g. NPPF para 110 (d), London Plan ItP version, Policies D12 Fire safety and Policy T6 Car Parking (I).

		We therefore request that appropriate design provisions are implemented to ensure access for emergency vehicles. The Trust is happy to answer queries or work with the Council on this.		
R14	1	Unite ultimately strongly support high-quality development and therefore support the principle of this policy. Unite also largely support the draft SPD with regards to amenity, and aim to ensure existing amenity is protected whilst providing high levels of amenity for future residents in all of their developments. However, we would argue that a minor update to the Daylight and Sunlight section should be made to note that mirror assessments will be accepted where necessary as a suitable methodology for assessing daylight and sunlight impacts of a development.		An additional sentence has been added to the end of para. 2.23. <u>Where a robust case can be made, mirror assessments may be accepted as a suitable methodology for assessing daylight and sunlight impacts of a development in some circumstances.</u>
R14	2	Additionally, Unite would re-iterate the need to assess the design principles of a scheme and their effects on amenity on a case by case basis, rather than set overly prescriptive restrictions. Unite appreciate and support the current drafting of the SPD in this respect.	N	No change
R14	3	***Urban Greening and Sustainability*** Unite support these principles in line with draft London Plan policy G5.	N	No change
R15	6	Noise and Vibration (Paragraph 2.26) should perhaps include reference to the 'Agent of Change' Principles in policy D12 of the London Plan.	Y	Accepted. An additional sentence has been added to what is now 2.28. '2.28 Noise and disturbance negatively impact quality of life and every effort should be made to avoid unacceptable impacts. <u>A starting point for all designers should be policy D12 of the London Plan. The London noise map should also be consulted</u>~~The London Noise Map is a useful starting point~~: http://www.londonnoisemap.com/'

R15	7	Paragraph 2.38 (4). It is right to insist on glazed entrances but the glass should be clear as frosted glass does not permit natural surveillance.	Y	Accepted. Additional word has been added to what is now bullet 4 para 2.40. ' 4. Provide clear glazed doors and entrance screens so that there is good natural surveillance.'
R15	8	Shop Fronts Section. This would benefit from some illustrations to better explain the clear advice in Policy Q16 and Policy Q17.	Y	Accepted. A shopfront illustration has been added on page 42
R15	9	Some reference to the higher standards in conservation areas and THI areas in Brixton might also be useful. Especially if there is a desire to perpetuate those high standards going forward.	N	Additional text added to end of what is now para 2.97 2.97 The Council accepts that many of Lambeth's shop fronts and signs are of poor quality and detract from the character of the Borough. It is committed to raising the standard going forward. In many instances the high quality examples of shop fronts in Lambeth are the product of grant aided regeneration schemes and in those locations, such as on Electric Avenue, it is essential that high standards are maintained and the high quality outcomes maintained in the long term.
R15	10	Paragraph 2.73: Is 'beauty' the right word? Maybe 'an attractive appearance' or something along those lines?	Y	Accepted. Para 2.98 bullet point 2. change to: '2. ~~Beauty through the use of good~~ Careful consideration and design of proportions, ~~and~~ ornamentation and colour to create an attractive appearance.'
R15	11	Illustrations on page 29 (adjacent paragraph 2.82) have been repeated on the following pages.	Y	Error correction: duplicated images have been omitted.
R16	1	The list in the Public Realm section 2.41 and soft landscape section 2.51 should mention inclusion of green infrastructure and sustainable drainage for cooling, flood risk, biodiversity, etc. as part of the	Y	Accepted. See response to R5.1

		design. The Urban Greening and Biodiversity chapter is good, but it should also be embedded in other sections.		
R17	1	Many communal garden areas around older council brick blocks have been fenced off for individual flat use and are 90% used as rubbish tip - these should be made communal again. Important for flats to have cross ventilation and rooms with good natural light - not with windows set in corners.	Y	Accepted. Whilst we fully accept the issue is problematic this document would be unable to change existing situations. However, an additional bullet has been added to what is now Para 2.59 '11. Not diminish the value of existing amenity space when making alterations or changes for example communal landscapes should not be subdivided for private use.'
R18	1	Noise and Vibration 2.26 2.28 On a more general level day-to-day noises can be problematic if not given the fullest consideration. Designers should: 1. Arrange new uses which are good neighbours to adjacent uses. 2. Locate bedroom windows away for busy communal entrances or late night uses. 2. Stack flat layouts so that bedrooms are aligned over bedrooms. 4. Provide adequate separation distances between dwellings and play spaces / play equipment. 5. Consider implications of early morning servicing and vehicle manoeuvring. This can include talking, the moving of cages, slamming of vehicle doors (headlights and other lighting can affect amenity too). 6. Consider the dispersal routes of late night users to and from existing and proposed uses. 7. Provide sufficient sound attenuation in conversions. 8. Use winter gardens in locations where noise levels would make conventional balconies unusable. 9. Ensure gates and entrances (including those to bin and bike stores) have soft closers and impact pads to guard against slamming. 10. Consider seeking the advice of soundscape advisers to mitigate against neighbouring noise sources none of this has been done on Myatts Field North Estate Reading the	N	Noted. No change.

		design it seem's lacking to mention the badly designed properties especially on the Myatt's Field North Estate SW9. When building the new maisonette's they have not thought about the design of having kitchen's above peoples bedrooms with adequate sound proofing meaning that residents below are plagued with everyday noises of their up stair neighbour generally living a normal life but below is bellowing echo's of metal frame work, walking and up and down and chairs scraping across the floors. This properties also have Metal Porches above their front doors and with the Lack of real working double glazing this offers the resident's to opportunity to sleep or lack of sleep with a constant sound of what I'd describe as a triangle being tapped 100 times per second causing resident's to sleep on Sofas as their bedroom's are to noisy and it's no fun sleeping next to a constant dripping tap when it's raining. Why didn't the architect think of these issues in designing the properties and place the kitchen's/ living room's at the TOP of the properties away from peoples sleeping quarters ?? making it easier for people to access their roof top gardens without having to travel through the hole house to reach their open space? Maybe your staff should come along and TRY to sleep in one of these properties before they build more of this cardboard boxes. Social Housing tenants deserve Decent homes to live in. Also the path was that are paved slab's are never cleaned growing moss and are dangerous for people to walk on when wet and certainly not cleaned to a standard that people are paying for and result's are people slipping and sliding whilst using walking aids unable to reach		

		the POD dustbin system due to the risk of falling and injuring themselves		
R22	8	Air Quality 2.30 Air Quality Guidance Note (GN) sets out the Council's advice for reducing air pollution. Link below: https://www.lambeth.gov.uk/sites/default/files/pl-lambeth-air-quality-planning-guidance-note.	Y	Accepted. The link has been updated.
R22	9	Surface Parking 2.43 Can we include provision of EV chargers?	Y	Accepted. We have added additional bullet point 7 to Para 2.47 '7. Where required include the provision of electric vehicle (EV) charger.
R22	10	Gardens 2.52 Is a small front garden and large rear garden (a suburban typology) the best use of space for new development from a sustainability perspective? Can this be rephrased to acknowledge the trade-off of the many types of layout/typology. Suburban typology is desirable however is not the most efficient use of space, and tends to be least energy efficient.	N	Not accepted. No change. The guidance is not supporting suburban typologies it is recognising their existence. Small front gardens and larger back gardens are characteristic across most of Lambeth including some of the denser urban areas. Their value is both in term of quality of life and local distinctiveness amongst other things. Gardens have been recognised as a key part of the borough's green infrastructure.
R22	11	New Rear Gardens 2.55 Can we mention the use of permeable surfaces/paving for the patio.		Accepted. We have added bullet point 4 to para. 2.57 '4. Use permeable paving wherever possible.'
R22	12	Communal Amenity Spaces 2.57 Bullet 2.	Y	Accepted. We have amended what is now bullet point 4 para. 2.59 4. Optimise soft landscaping (to bring colour, texture and interest) ~~and~~, sustainable drainage~~)~~ and where necessary mitigate air quality or environmental constraint.

		Where location of outdoor areas can not avoid areas of poor air quality, the use of GI such as a green screen should be used to reduce exposure. Bullet 4 typo Bracket required? Bullet 9 Can we include a mention to tree infrastructure such as root barriers to avoid issues on utilities, pipes, and heaving of footways.		For tree planting see response to R8 comment 10b. See also response to R7 comment 2.
R22	13	2.58 We should be promoting and enabling food growing and biodiversity (e.g. blue green roofs, bee, keeping). A roof use hierarchy would be ideal...	Y	Accepted. We have added section on Green Infrastructure. See response to R5 comment 1
R22	14	Urban Greening Factor 2.66 Reference the Borough's Green Infrastructure strategy.	Y	Accepted. This has been included in the new section added on Green Infrastructure. See response to R5 comment 1
R22	15a	Sustainable Urban Drainage The SPD on basements (Part 5) has more detail on SuDS and flood risk than for the the advice on all developments.		Agreed. Content amended **Sustainable Drainage Systems (SuDS)** 2.87 TFL guidance on Sustainable Drainage states: The risk of flooding in London increases year on year, with more frequent and intense storms and significant quantities of surface water runoff. (This is the movement of rainwater over the surfaces of the city, including the ground, streets, footways and roofs.) London's existing network of sewers and drains is at or near capacity in many areas an the issue is exacerbated by a rapidly increasing population. This has already exceeded London's previous peak and is reflected in the scale of development in the city.

				Sustainable drainage systems (SuDS) can help address flooding risks by managing surface water runoff in a way that mimics natural processes, slowing down the runoff rate while providing wider benefits, such as public realm improvements. https://content.tfl.gov.uk/sustainable-urban-drainage-november-2016.pdf) ~~2.67 The risk of flooding in London increases year on year, with more frequent an intense storms and significant quantities of surface water runoff. (This is the movement of rainwater over the surfaces of the city, including the ground, streets, footways and roofs.)~~
R22	15b	We can also refer to the LFRMS and SWMP 2.67 Can this be replaced by the Sustainable Drainage Systems sections from Part 5? (paragraphs 5.90 to 5.93), but maintain the "designers should: 1. ....." Bullet 1 Can this be changed to: "Incorporate a Sustainable Drainage System in accordance with the GLA's SuDS Hierarchy to mitigate a development's impact on flood risk" Bullet 2 Can this be replaced by: "Incorporate Source Control SuDS such as green roofs, and permeable surfaces" Bullet 3 Can this be altered to "Carefully design areas that drain via SuDS with an understanding of how they are laid to fall to ensure effective drainage. Bullet 4 Can this be a separate point? Bullet 4 Can this be its own point? "Reference CIRIA SuDS Manual for technical information on SuDS.....)	Y	Accepted 2.94 Increasing the surface coverage with soft landscaping will provide the best solution to surface water run-off whilst also adding to air quality and biodiversity. For example, rain gardens increase the effectiveness of planting where surface run-off water from hard surfaces are channelled into planters. Designers should: 1. ~~Explore how sustainable drainage can mitigate the risk of flooding~~ Incorporate a Sustainable Drainage System in accordance with the GLA's SuDS Hierarchy to mitigate a development's impact on flood risk. 2. Incorporate Source Control SuDS such as green roofs, and permeable ~~paving~~ surfaces. 3. Carefully design ~~rain gardens~~ areas that drain via SuDS with an understanding of how they ~~areas of paving~~ are laid to fall to ensure effective drainage~~. Information regarding the technical build-up of the substrate layers will also be required through planning~~ 2.72. Ensure a maintenance strategy is in place to ensure SuDS remain effective. For major development schemes a maintenance strategy should be submitted as part of the planning application. For further

		Can we also include a reference to TfL and GLA design guidance?		reading and guidance on how best to integrate SuDS into ~~their~~ schemes see the CIRIA SuDS Manual for technical information on SuDS, TFL guidance document SuDS in London 2016 and the Mayor's London Sustainable Drainage Action Plan https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS https://consultations.tfl.gov.uk/policy/suds-guidance/results/suds-consultation-report-final.pdf https://www.london.gov.uk/sites/default/files/lsdap_december_2016.pdf
R22	16	Biodiversity 2.71 Can we refer to the Biodiversity Action Plan	Y	Accepted. We have added new section on Biodiversity which refers to the Action Plan. See response to R5 comment 3
R22	17	Frontage Security bullet 1 Are we missing the opportunity to retro-fit thermally efficient glass?	N	No change here. Retrofit is addressed in Part 4 of the SPD.
R23	17	Para 2.7 ADD BULLET POINT: Impact on physical and mental wellbeing from proximity and access to green space	Y	The impact on physical and mental wellbeing from proximity and access to green space is not a consideration under Policy Q2 and therefore reference here would not be appropriate. However, the text extended to read '2.10 These matters are particularly important as density increases and ~~the development potential of sites is optimised~~ given the very important connection between physical and mental well being and access to green and specifically, natural space.
R23	18	Para 2.18 onwards - Add paragraph under Daylight and Sunlight section on need to manage solar gain to reduce overheating in summer months and reduce reliance on heating systems in the winter, maintaining appropriate comfort levels.	Y	Bullet 3 of para 2.27 already addresses solar gain. An additional bullet has been added there: '5 good solar design can reduce reliance on heating systems in the winter'
R23	19	Para 2.30 – not sufficient to have a link. Suggest:		New text at start of what is now 2.32

		Air pollution is a significant public health hazard for people who live, work and travel through the borough. This is particularly the case for young, old or vulnerable people, but everyone is at risk from exposure to pollution of illnesses such as heart and lung diseases, cancer and acute respiratory infections. Lambeth is a designated Air Quality Management Area, designated as such due to exceedances of national air quality objectives for nitrogen dioxide (NO2) and particulate matter (PM). Key sources of air pollution include on- and off-road vehicles, gas boilers and industrial fuel combustion. New development must design for reduced exposure of receptors to new and existing sources of pollution, and minimised emissions from introduced sources, through mitigation on-site as a priority. The Lambeth Air Quality Guidance Note (GN) sets out the Council's advice for reducing emission of and exposure to air pollution. Link below:		Air pollution is a significant public health hazard. This is particularly the case for young, old or vulnerable people, but everyone is at risk from exposure to pollution. Lambeth is a designated Air Quality Management Area due to exceedances of national air quality objectives for nitrogen dioxide (NO2) and particulate matter (PM). Key sources of air pollution include on- and off-road vehicles, gas boilers and industrial fuel combustion. New development should design for reduced exposure of receptors to new and existing sources of pollution, and minimised emissions from introduced sources, through mitigation on-site as a priority. The Lambeth Air Quality Guidance Note (GN) sets out the Council's advice for reducing emission of and exposure to air pollution. Link below: (typo 'London's air quality map' has been corrected and link updated.)
R23	20	Para 2.31 New bullet 7: Optimise indoor air quality (e.g. low carbon heating systems, electric cooking, air filtration and purification)	Y	In what is now 2.33: New bullet 7: Optimise indoor air quality (e.g. low carbon heating systems, electric cooking, air filtration and purification)
R23	21	ADD TO LIST "Use energy efficient low energy lighting"	Y	What is now para 2.34: Additional bullet added Use energy efficient low energy lighting
R23	22	Para 2.39 ADD Lambeth's commitment to protect, enhance and increase green areas aligns with the London Environment Strategy, available here: https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf	N	Such a reference is not relevant in the public realm guidance section.

R23	23	2.40 bullet 1 Add footways "and cyclelanes" and "cycle paths"…and emergency vehicles	Y	Now para 2.43: Text amended to read: 1. Opportunist car parking on pedestrian spaces and cycle lanes / cycle paths ~~pedestrian spaces~~, verges and footways inconveniences people ~~pedestrians~~ (especially wheelchair users and people with buggies), can be a threat to their safety, and can block routes for emergency vehicles. Opportunist parking ~~It~~ should be anticipated and addressed at design stage.
R23	24	2.41 ADD BULLET: Create shaded spaces and maximise tree cover to ensure cooler outdoor spaces and seating areas	Y	Accepted. In what is now para. 2.44: Bullet 8 added: Include shaded spaces and optimise tree cover to ensure cooler outdoor spaces and seating areas
R23	25	2.41 Minimise exposure to air pollution through the provision of greening/other shields, location of seating areas, and o er measure to reduce the sources of air pollution	Y	Accepted. In what is now para. 2.44: Bullet 9 added: Minimise user exposure to air pollution through good design including the provision of greening/other shields where required.
R23	25	2.43 ADD BULLET: Include provision of EV chargers, and where possible integrate solar PV	Y	Accepted. What is now para. 2.47: Bullet 7 added: Where possible use solar PV powered EV chargers
R23	26	2.43 ADD "Clearly delineate pedestrian/cycle routes…"	Y	What is now para. 2.47: Bullet 3 amended to read: clearly delineate pedestrian/cycle routes and parking bays
R23	27	2.43 ADD BULLET: Ensure sufficient provision of secure and easily accessible cycle parking	N	This is a policy requirement that does not need to be repeated here in the guidance. No change.
R23	28	ADD: "Sufficient" cycle	N	Policy dictates the quantum of provision. The role of the design guidance is to assist with the design / implementation. No change
R23	29	2.51 ADD BULLET: Ensure provision of "greenscreens"/other green barriers on peripheries exposed to air pollution sources	Y	In what is now 2.54: New Bullet 10 added: Use "greenscreens"/other green barriers on peripheries exposed to air pollution sources

R23	30	2.51 CHANGE BULLET POINT 5: Ensure plant choice and designs create productive habitats for pollinators and other wildlife, delivering maximum biodiversity benefits.	Y	Accepted. What is now para. 2.54: Bullet 4 edited: ~~Create opportunities for natural habitats~~ Ensure plant choice and layouts create productive habitats for pollinators and other wildlife, delivering maximum biodiversity benefits.
R23	31	2.52 Suggest deletion of "The borough's traditional pattern development – dwellings with small front gardens to the street and larger private gardens to the rear is still considered the best solution for new residential development In Lambeth." Houses with front and back gardens are not an efficient use of space, and less dense residential areas are less efficient in terms of energy use, infrastructure and travel per capita	Y	Accepted. Para 2.55 has been amended to read: ~~The borough's traditional pattern development – d~~Dwellings with small front gardens to the street and larger private gardens to the rear are an established feature of Lambeth's character. ~~is still considered the best solution for new residential development In Lambeth~~. ~~However,~~ Furthermore, many estates are characterised by communal amenity spaces which, when carefully designed and well maintained, are a great asset.
R23	32	2.55 bullet 1 - ADD TEXT: Where a patio is installed, surfaces/paving should be permeable	Y	Text in what is now para 2.57 has been amended to read: 1. Be mindful that small areas of lawn can suffer badly from heavy wear (especially in family homes) and the occupier will need a lawn mower (and a shed to store it in). In these instances a 'patio garden' (a permeably paved patio with perimeter beds for shrubs and flowers) may be more durable / practical.
R23	33	2.56 - ADD BULLET: Avoid locating balconies at the façade of buildings exposed to significant sources of air pollution such as busy road	Y	What is now para 2.58 text has been amended to read: 2. ~~Carefully consider the location and accessibility early in the design process to o~~Optimise their amenity value (~~including~~ in relation to matters such as solar gain, sunlight, noise, poor air quality etc.). Locations with significant sources of noise or poor air should be avoided or improved through good design / mitigation measures such as green screens. 3.

R23	34	2.56 ADD TO BULLET 2: Efforts should be made to avoid placing outdoor areas in proximity to air pollution sources. Where this cannot be avoided, efforts to made mitigate air pollution sources, and use green infrastructure such as a greenscreens to reduce exposure.	Y	The changes are captured in response to R23 33.
R23	35	2.57 ADD TO BULLET 2: Efforts should be made to avoid placing outdoor areas in proximity to air pollution sources. Where this cannot be avoided, efforts to made mitigate air pollution sources, and use green infrastructure such as a greenscreens to reduce exposure.	Y	The changes are captured in response to R23 33.
R23	36	2.57 - ADD TO BULLET 9: Deploy tree infrastructure such as root barriers to avoid issues on utilities, pipes, and heaving of footways.	N	This level of detail is not considered necessary as tree planting on the street and on footways is undertaken by the Council.
R23	37	2.58 ADD BULLET TO LIST: Review the feasibility of green roofs and/or blue roofs, to promote biodiversity and support sustainable drainage	Y	This section is on amenity spaces not on roof construction. Part accepted. In what is now 2.60 a new BULLET has been added: Select plants for biodiversity and sustainable drainage.
R23	38	2.58 AMEND BULLET POINT 3: The council should not be promoting artificial grass - which blocks soil for insects/worms (when on ground), blocks drainage, and is a source of plastic pollution as it degrades.	Y	Accepted. In what is now 2.60 the following changes have been made: 3.Consider the practicalities of access for maintenance and gardening. For example, on roof terraces conventional lawns can be costly and impracticable to maintain and often suffer badly from the heavy wear of communal use. In such instances ~~artificial grass~~ tactile surfaces such as rubber playground finishes may be the most practicable / comfortable option for surfaces where occupiers can play, lie, and relax.
R24		Suggest new para after 2.39 *Where bollards are required for community safety and traffic management the design approach taken should*	Y	Accepted. New para has been inserted 2.45 Where bollards are required for community safety and traffic management the design approach taken should be contextual. Stainless

		be contextual. Stainless steel bollards of the minimum diameter possible will generally be supported across Lambeth. To maximise corrosion resistance, the brushed stainless steel finish should be grade 316 as standard. In sensitive locations, such as in some conservation areas and within the curtilage of some heritage assets, traditional black painted bollards or traditional black sleeves over contemporary bollards will generally be preferable. On the borough boundary, especially on the River Thames Bridges and their approaches, a unified approach with that of the adjoining borough will generally be sought.		steel bollards of the minimum diameter possible will generally be supported across Lambeth. To maximise corrosion resistance, the brushed stainless steel finish should be grade 316 as standard. In sensitive locations, such as in some conservation areas and within the curtilage of some heritage assets, traditional black painted bollards or traditional black sleeves over contemporary bollards will generally be preferable. On the borough boundary, especially on the River Thames Bridges and their approaches, a unified approach with that of the adjoining borough will generally be sought.
R23	39	2.80 ADD TEXT: New windows which are installed to improve energy efficiency levels should aim to be sympathetic to the existing design	N	This is stressed in Part 4 of the SPD. No necessary to state it here also.
R23	40	2.89 PLEASE INCLUDE SPECIFIC SECTION FOR MORE DETAILED GUIDANCE ON LOCATING HEAT PUMPS.	N	Part accepted. The general guidance in this section is considered sufficient but reference has been added in para 2.114 to the planning portal as much of this is work is likely to be PD for dwellings. See new para 2.114 in response to R23 42.
R23	41	PLEASE INCLUDE SPECIFIC SECTION FOR MORE DETAILED GUIDANCE ON SOLAR PV.	N	The general guidance in this section is considered sufficient in terms of covering key considerations. Solar PV are so reliant on technical requirements (orientation etc.) that there is nothing that can be added to guidance, especially where in many cases they are PD
R23	42	ADD BULLET: The council acknowledges that air source heat pumps, fitted externally to buildings, are likely to play a major role in decarbonising Lambeth's buildings. Efforts should be made to locate heat pumps to rear or where appropriate on the roof of buildings.	Y	Accepted. What is now para 2.114 has been re-written to read 'Some plant installations may be permitted development. For further information see www.planningportal.gov.uk. ~~Poorly considered plant (air conditioning units, solar panels. extracts etc.) and equipment (meter boxes, pipes, cables, satellite dishes, antennae etc.) mar a great many buildings in Lambeth often because the convenience of the installer has been put before the appearance~~. External building plant is an unavoidable part of modern life and going ~~forward~~ air source heat

				pumps, fitted externally to buildings, and solar panels, are likely to play a major role in decarbonising Lambeth's buildings. Designers should:
R24		Could reference be made to minimising clutter, or equivalent terminology, perhaps in P2, Inclusive Environments?	Y	An additional bullet 5 has been added to para 2.2 • Clutter free
Planning Policy Liaison Forum PPLF	1	In relation to outdoor space can the safety of women and girls be added as a consideration?	Y	Following changes have been made: 2.1 Lambeth has a diverse and evolving population, the design approach for buildings and spaces should result in an inclusive environment that is accessible to all. While the needs of wheelchair users and people with physical impairment are very important it is equally essential to meet the needs of those with learning difficulties, mental health conditions, visual impairments, hearing impairments and those of older people, women, young people, and children.
PPLF	1b		Y	2.8 **1. Activity for all** Neighbourhoods, facilities and open spaces should be accessible to all users and should support sport and physical activity across all ages. • Enabling those who want to be active, whilst encouraging those who are inactive to become active. Designers should take a 'gender mainstreaming' approach to ensure that the needs of both genders are equally met.
PPLF	1c		Y	2.39 Applicants should seek guidance from the local 'Secured by Design' team during the pre-application planning stage, the contact email is: DOCOMailboxSE@met.police.uk . Taking a 'gender mainstreaming' approach, designers should:
PPLF	1d		Y	New para:

				2.42Designers are encouraged to take a 'gender mainstreaming' approach to the design of public places and spaces - recognising the different needs of men and women having regard to other differences (such as age, ethnicity, race, religion etc.) to ensure that both men and women benefit equally. Whilst community safety considerations will be key, a gender mainstreaming approach should look beyond these to matters such as fitness for purpose, usage, and facility provision. For more information on this topic see RTPI Research Paper 'Women and Planning (Part II)'.
PPLF	2	Active environments section 'Wheeling' has a role to play in relation to active travel		Active environments. The following changes have been made at 2.8: **2. Walkable communities** Homes, schools, shops, community facilities, workplaces, open spaces and sports facilities should be within easy reach of each other. • Creating the conditions for active travel between all locations for those cycling walking and wheeling.
PPLF	3	It is really important that children are safe in the places designed to include that informal play. This should be stressed in the document.	N	No change. Para 2.62 already has clear content on this area: 3. Areas immediately beyond the front door should be designed with the play needs, health, well-being and development of children and young people in mind • There should be safe, playable outdoor spaces immediately outside of the front door. This means that there will be places where children can meet and play together in safety immediately beyond the private home. This could mean, for example, a deck access area which incorporates space to socialise, or a safe shared garden or a car-free playable street • Pavements outside homes or flats should be wide enough for safe play. • Podium and roof level play should be well overlooked. • Gardens should be accessible by all children and young people in a development. Segregation between tenures should be strongly avoided. • Communal gardens should receive direct sunlight throughout the day.

				• Acoustics should be considered so that noisy play does not create issues with other residents. • Lighting throughout residential developments should be of a yellow/orange colour to avoid disturbing sleep and circadian rhythms. 4.Routes and streets between homes and destinations should incorporate informal playable, safe, stimulating, and environmentally rich landscape design, and are designed so that young people have the freedom to safely and independently walk, cycle and take public transport between their homes and destinations: • Opportunities should be taken to improve streets, where possible by incorporating informal linear play, opportunities to interact with nature and opportunities to socialise or rest. • Designers should assist Lambeth in its goal to create a network of safe, walkable, cyclable streets where cars are either absent or their impacts are greatly reduced. • Street furniture should be provided which is comfortable, warm and usable by people of all ages. • Landscaping should incorporate elements which encourage unstructured, imaginative, exploratory play.
PPLF	4	The routes children have to take to off-site play space need to be safe too.	Y	Accepted. An additional bullet has been added to 2.66 6: 6. <u>Where off-site play provision is proposed the safety of the route taken by children should be considered. Where necessary, working with highways authority, safety improvements should be made.</u>
PPLF	5		Y	Accepted. 2.66 has been amended to read: When approaching play provision designers should:

				1. Locate it in accessible, attractive places with good natural surveillance away from hazards, unacceptable noise and poor air quality and ensure routes to it are safe for children.
PPLF	6	Boundaries and gates Concern has been raised by some in the community about the heaviness of metal gates – especially for the elderly and children. Can this be touched upon in the guidance?	Y	Additional bullet added at 2.118: 6. Take into account the needs of all users, particularly the elderly and children when designing large gates. Where heavy or unwieldy gate designs are unavoidable, they should be power-assisted.
PPLF	7	Boundaries and gates It is worth stressing here the need for gaps in boundaries to accommodate small mammals like hedgehogs. See supporting text 10.72 in the local plan.	Y	Additional bullet added at 2.118: 7. Provide small, ground level gaps in rear garden fences to allow wildlife, such as hedgehogs, to move freely around their habitats. A gap of 13cm x 13cm is sufficient for a hedgehog.
R21	Lambeth Environmental Protection Team	Can we please add additional content on delivering a net biodiversity gain? Suggested text below: **Delivering a net biodiversity gain** Where development involves the loss of existing habitats, trees or green infrastructure this loss will need to be mitigated in accordance with policy. Designers should remember that the baseline biodiversity value of the site is measured prior to any loss to facilitate development. Biodiversity net gain must be additional to the original biodiversity value of the site. To deliver a sustainable, long-term gain for biodiversity on a development site, designers should consider the:		Accepted. Text added: 2.74 To deliver a sustainable, long-term gain for biodiversity on a development site, designers should consider the: • Retention and enhancement of any existing areas of woodland, hedges and boundary features, or the provision and planting of new trees and hedges of high biodiversity value, in lines, copses and mixed stands; • Retention and enhancement of any existing areas of structurally and botanically diverse (species-rich) grasslands and meadows, particularly ones high in species of importance for pollinators or invertebrate-feeding bats and birds; • Retention and enhancement of any existing ponds, open streams and wetland features, or creation of new ones,

		• Retention and enhancement of any existing areas of woodland, hedges and boundary features, or the provision and planting of new trees and hedges of high biodiversity value, in lines, copses and mixed stands; • Retention and enhancement of any existing areas of structurally and botanically diverse (species-rich) grasslands and meadows, particularly ones high in species of importance for pollinators or invertebrate-feeding bats and birds; • Retention and enhancement of any existing ponds, open streams and wetland features, or creation of new ones, particularly if part of an integrated sustainable urban drainage system (SuDS) or surface water storage schemes; • Design and long-term management of external soft landscaping features to encourage a diversity of pollinators; • Provision of habitat features for insects, such as 'bee bricks', bumblebee nest boxes and 'bug hotels'; • Refugia and sanctuary areas for amphibians and reptiles; • Wildlife refuge features and corridors suitable for small mammals, birds, invertebrates and reptiles; • Provision of bird boxes suitable for a range of species, including swifts, both surface or tree		particularly if part of an integrated sustainable urban drainage system (SuDS) or surface water storage schemes; • Design and long-term management of external soft landscaping features to encourage a diversity of pollinators; • Provision of habitat features for insects, such as 'bee bricks', bumblebee nest boxes and 'bug hotels'; • Refugia and sanctuary areas for amphibians and reptiles; • Wildlife refuge features and corridors suitable for small mammals, birds, invertebrates and reptiles; • Provision of bird boxes suitable for a range of species, including swifts, both surface or tree mounted or physically integrated into any new or retained walls, eaves and roofs; • Provision of bat boxes, especially 'bat bricks' which are physically integrated into any new or retained walls, eaves and roofs; and • Use of wildlife sensitive lighting to minimise light spill within sensitive habitats. • Installation of high biodiversity value 'living' green roofs and/or green walls, brown roofs (composed of crushed brick, gravels and aggregates of variable depths, with integral stone and log piles alongside areas of bare substrate) etc; Any on-site measures included to achieve biodiversity net gain may also contribute to delivering the required urban greening factor score.

		mounted or physically integrated into any new or retained walls, eaves and roofs; • Provision of bat boxes, especially 'bat bricks' which are physically integrated into any new or retained walls, eaves and roofs; and • Use of wildlife sensitive lighting to minimise light spill within sensitive habitats. • Installation of high biodiversity value 'living' green roofs and/or green walls, brown roofs (composed of crushed brick, gravels and aggregates of variable depths, with integral stone and log piles alongside areas of bare substrate) etc; Any on-site measures included to achieve biodiversity net gain may also contribute to delivering the required urban greening factor score.		

PART 3 – DESIGN ADVICE FOR NEW BUILDINGS

Respondent no.	Comment no	Comment	Accepted Y or N?	Response
R8	11	**Overview** New buildings should respond to their context, not defy it. While a "camouflage" approach may be acceptable if a new building is of similar scale to its surroundings, a more positive addition to the street scene will always be preferred.	N	Noted.
R8	12	**Tall Buildings generally:** (paras 3.28 to 3.40) This section is probably now of the greatest concern to residents. Sadly, the Council has failed to enforce its existing policies (notably Q26 in the recent draft revision), resulting in a rash of consents and proposals for unsightly tall buildings extending beyond the "preferred" tall building zones. No SPD is going to overcome the weakness that remains in policy Q26 itself and in particular, its definition of Tall Buildings (p.324, para 10.147 in the recent draft revision). Our area of benefit is wholly north of the South Circular Road, and the predominant building form is still 3 storey terraces, with pockets of 4/5 storey flats inserted since the 1930s and isolated tower blocks of up to 16 storeys, mostly left from the 1960s. Any building rising more than **15m** above ground level will be prominent in this context and should therefore be treated as a Tall Building. The "mid-rise" category should be deleted from the table because as drafted it allows prominent buildings to ignore the safeguards in the policy.	N	Noted. These observations relate to the Lambeth Local Plan policy Q26. This SPD can't deviate from the policy position.

R8	13	(following para 3.28) The purpose of the illustrations following the introductory paragraph is unclear. These should certainly not be regarded as examples of good practice. Rather they show that variations in facing materials do not redeem buildings which are of excessive scale and poorly composed. We urge adopting a similar approach to Part 4 of the SPD (Alterations etc.) and showing examples of both good and bad practice.	N	Noted. We have revisited illustrations and added captions to provide clarity.
R8	14	**Visual Impacts and Context** (para 3.29 and tables) Tables 1 and 2 imply that an ugly building would be permitted if the site were outside a Conservation Area and not adjacent to Listed buildings. It would be more realistic, since Tables 1 and 2 largely overlap, to combine them in a single table for easier reference.	N	This is not correct. The tables for impact assessment and are based on established best practice. Table 1 relates to heritage, table 2 to townscape.
R8	15	**Wind and Microclimate** (paras 3.31-3.35) In the latest revision of policy Q26 para a(v), we have already called for more consideration to be given to microclimate and wind deflection/ turbulence issues. We look to the SPD to set out clear standards for the detail and acceptable sources for supporting evidence. We commend the criteria recently adopted by the Corporation of London as a model. If the criteria in the SPD paras 3.31-3.35 are based on those adopted by this or other reputable authorities, acknowledging them here would strengthen the Council's position in the event of appeals.	N	Noted.
R8	16	In the table following para 3.34, service yards should be moved from Category 5 to Category 4, bearing in mind their widespread use by cyclists, delivery drivers and maintenance	Y	Accepted. We have removed reference to service yards in table which is now on page 24 after para. 3.62

		staff. A specific hazard is waste materials and light panels being blown around, particularly if building repairs are underway.		
R8	17	**Omissions from the SPD** We have already commented on the latest version of Q26 (paras a(iv) and b) that more consideration should be given to the situation where two or more tall buildings are being proposed close together, perhaps by different developers. The key issues in both existing and potential "tall building clusters" are daylight, overshadowing and mutual privacy. If these are addressed elsewhere in the SPD, they should at least be flagged up here.	Y	Accepted. We have supplemented text to bullet point in what is now para. 3.55 '7. Mitigate against potential adverse impacts – wind, micro-climate, daylight and sunlight etc. through design excellence. <u>This is particularly important where tall buildings are in groups or clusters. Cumulative effects must be considered.</u>'
R9	3	**Tall Buildings –** It would be helpful to include reference to the LVMF in 3.30	Y	Accepted. The text has been amended to read: Para 3.58 include reference to LVMF 3.30 With development affecting the setting of the Westminster World Heritage Site designers should <u>carry out a heritage impact assessment</u> ~~also~~ refer<u>ring</u> to the following guidance documents: • ICOMOS 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties', 2011 • Mayor of London's 'World Heritage Sites, Guidance on Settings, 2012 • <u>Mayor of London's 'London View Management Framework (LVMF), 2012</u>
R9	4	We welcome reference to 3D modelling	N	No change

R9	5	The matrix set out is useful starting point but that full analysis will still be required as part of a robust Heritage Impact Assessment, particularly in relation to the WWHS	Y	Noted
R9	6	Table 5 – it may be helpful to specify that major improvements to heritage receptors can be achieved following the removal of existing harmful or negative features. This will help the matrix be more locally specific with Lambeth's emerging tall buildings policy.	Y	Accepted. However, rather than in the table we have made a new bullet point 7 added to para 3.55 8. When remodeling existing tall buildings, take opportunities to improve the appearance of buildings which are considered to have harmful effects.
R9	7	It would be helpful if this section also drew attention to the tall buildings topic papers and studies that form part of the emerging plan's evidence vase. As with the Lambeth Local Distinctiveness Study, these papers can be a useful starting point for both applicants and decision makers.	Y	Accepted. We have added new para referencing background documents. '3.56 The background documents supporting policy Q26 are useful starting point for designers these include Lambeth Local Distinctiveness Study 2012, Lambeth Tall Building Topic Paper 8, Brixton, Waterloo and Vauxhall Tall Buildings study.'
R10	4	In relation to Part 3 of the Draft Design Code SPD, LHG are supportive of assessing optimal capacity for sites as well as addressing any existing 'negative attributes' through good design and enhancing the positive characteristics of a site.	N	Noted. No change
R11	14	**Residential** **Development-** We support requirements for new houses within existing residential curtilages and limited on-site parking spaces to prioritise front garden space for refuse, secure cycle storage and soft landscaping.	N	Noted. No change
R11	15	**Industrial Development –** We support the use of perimeter landscaping to soften the impact of service yards.	N	Noted. No change
R12	2	TfL CD supports the main premise of this section. The design of development must optimise site capacity to make the	N	Noted. No change

		most efficient use of land and accommodate growth on all suitable and available brownfield sites within the borough, in line with Intend to Publish London Plan Policy D3 Optimising site capacity through the design-led approach and H1 Increasing housing supply. TfL CD owns a number of sites within the borough which are appropriate for residential-led mixed-use development and have the potential to contribute towards meeting the boroughs housing target. Paragraph 3.4 which advocates optimising site capacity is therefore welcomed. However design requirements must not be so onerous that they prevent development from coming forward; they must support the most appropriate type of development in both design terms and economic / housing delivery terms.		
R12	3	Tall buildings – TfL CD understands the extra design consideration that must be given to tall buildings to ensure they positively respond and contribute to the context of their surroundings. However, when sensitively developed on appropriate sites tall buildings can enable the efficient use of land; site potential to be optimised and housing delivery to be maximised, in line with Intend to Publish London Plan Policy. This could be reflected in the SPD.	Y	Accepted. Add sentence to para 3.54: 3.54 'When sensitively developed on appropriate sited tall buildings can enable the efficient use of land; site potential to be optimised and housing delivery to be maximised, in line with the London Plan. Lambeth's tall building stock, which is largely situated in the middle and north of the borough, dates form the 1950s right up to the current day. Policy Q26 sets out the policy requirements for tall building development which include design considerations such as architecture, detailing, materials, form and silhouette. Given that tall buildings are by their definition 'substantially taller' than their context their impact is undoubtedly going to be greater.' In addition, we have revised the bullets under 3.55 to give clearer guidance on sensitivity of design

				1. Consider the impact of the building in near, medium and distance views and take particular care to ensure that the building massing and form are successful in each context. 2. ~~Guard against outcomes that loom uncomfortably over existing low-rise neighbours~~ Ensure the design meets the design objectives of any associated tall building cluster and that proposals relate positively to other tall buildings against which they will be seen in order to create a comfortable relationship and a pleasing composition. Avoid forms, materials, orientations which clash with other tall buildings nearby 3.~~Ensure the design meets the design objectives of any associated tall building cluster.~~ Ensure that a human scale is created at the ground level. Avoid towers which contribute to overscaled places, create a canyon effect with other tall buildings, which loom uncomfortably over low-rise neighbours or pedestrians. 4.Seek well-proportioned architectural outcomes which ~~which unify the top, middle and base into a coherent whole.~~ often will require a strong base/podium related to the scale and character of the street, a middle section which is

				uncomplicated and a defined top, composed as a coherent whole. 5. Ensure architectural quality and materials are of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its life. 6 Use materials that positively respond to Lambeth's local distinctiveness in order to integrate the building with its immediate and wider context'. 7.Mitigate against potential adverse impacts – wind, micro-climate, daylight and sunlight etc. through design excellence. This is particularly important where tall buildings are in groups or clusters. Cumulative effects must be considered. 8. When remodelling existing tall buildings, take opportunities to improve the appearance of buildings which are considered to have harmful effects.
R13	2	A key aim of the Trust is to ensure that it can continue to adapt, improve and develop its hospitals and healthcare facilities in the future. This includes the provision of research and development facilities and offices within hospital campuses. It is vital that the Trust can continually improve the healthcare facilities available to ensure that it can provide top quality healthcare services and pioneering	N	No change. These detailed matters are considerations for the development management process, it would inappropriate to add reference here to such site specific matters.

		research that will serve the increasing population of Lambeth. It is noted that the Draft Design Code SPD – Part 3 contains a section on Tall Buildings which refers to Lambeth's tall building stock that is largely situated in the middle and north of the Borough, including St Thomas' Hospital. Draft Policy Q26 states that tall building developments are required to include design considerations such as architecture, detailing, materials, form and silhouette. However, particularly in the case of St Thomas' Hospital, it must be appreciated that land constraints could limit a site's capacity to deliver necessary growth to support Lambeth's existing and future population. The Trust may be required to expand both horizontally and vertically on the hospital site to enhance its services and are concerned that the rigid approach set out in the Design Code SPD may limit the options for provision of future healthcare growth.		
R13	3	The Council's intention to use the Zone of Theoretical Visibility (ZTV) tool to identify and analyse the visual impacts of tall buildings is recognised as is the need for a robust process, however the method of measurement used, such as the scale of change, requires subjective judgement and could quite easily be misconstrued or inflexible to proposals. The rigid testing may not allow for sufficient flexibility for sites to build upwards where there is no viable alternative and a significant need and will need to be considered in the wider planning balance by the Council, as is likely to be the case for the Trust's site at St Thomas' Hospital. We therefore request that appropriate provisions be made to ensure flexibility when considering applications and if appropriate,	N	Not accepted. No change. See response to R13 comment 2 It is accepted that a lot of assessment can be considered subjective. In a way the ZTV avoids speciulation by providing clear factual evidence. Clarity in the process is considered essential. To assist with ensuring there is clarity of evidence we have added additional text has been added at 3.57 Point added: 1. Preparing a Zone of Theoretical Visibility (ZTV) map to illustrate all the locations where the proposal is visible from. The map should be used to identify sensitive receptors within a

		recognition of the Trust's need to support the growth of the Hospital as a primary care and medical research facility.		minimum of 500m for assessment. These should include the settings of heritage assets or places of townscape / landscape value. Additionally, the applicant should provide the council with a scaled digital model for the council to assess in VI-city model.
R14	4	***Tall Buildings*** The SPD states that proposals should: 1. Consider the impact of the building in near, medium and distance views and take particular care to ensure that the building massing and form are successful in each context. 2. Guard against outcomes that loom uncomfortably over existing low-rise neighbours 3. Ensure the design meets the design objectives of any associated tall building cluster. 4. Use materials that positively respond to Lambeth's local distinctiveness in order to integrate the building with its immediate and wider context'. 5. Seek elegant and well-proportioned architectural outcomes which unify the top, middle and base into a coherent whole. 6. Mitigate against potential adverse impacts – wind, micro-climate, daylight and sunlight etc. through design excellence. Unite are supportive of these principles, particularly with regards to the need to assess visual impact and mitigate any adverse impacts through design excellence, a principle which Unite consistently aim to achieve.	N	Noted. See response to R12 3
R15	12	Paragraph 3.12. The top three images are well-designed buildings but I don't think they can be considered 'contemporary'. They are more of a modern take on	Y	Accepted. Captions have been amended.

		Lambeth's established character. Perhaps it should be captioned 'New London Vernacular'?		
R15	13	Paragraph 3.22. It might us use stating that most of the advice here is also relevant for houses in back land sites which are not gardens	N	No change. Policy Q14 of the Lambeth Local Plan no longer includes reference to backland sites.
R15	14	Paragraph 3.25 "Return Frontage Development within Residential Curtilages". Clarification should be made as to whether this type of development appropriate in conservation areas where the gaps between the terrace and the terrace on the side street make a positive contribution. Materials, form and fenestration should positively respond to the character and detailing of the wider street.	N	No change. There are 62 conservation areas in Lambeth and they are often concentrated in the middle and north of the borough where gardens are small and development opportunities of this nature not possible. Given that each conservation area has its own unique character, acceptability needs to be assessed on a case by case basis.
R15	15	Paragraph 3.28 "Tall Buildings". It would be useful to make reference to Intend to the draft London Plan which states: *"Architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan"* – To achieve this the Council may wish to consider see detailed construction drawings at application stage.	Y	See response to R12 3
R15	16a	Paragraph 3.30 – Tables 1 – 5. Some of the table content would benefit from revisiting. For example. It seems disingenuous to suggest that listed buildings have only a low receptor value. On table 1 surely undesignated, poor quality, places would have 'very low' (industrial estates etc.), 'ordinary' undesignated development would be 'low' with local heritage assets being 'medium' and designated heritage assets being 'high'? Very High would be preferable to the term 'exceptional and would cover those places of acknowledged national or international significance.	Y	Accepted. Table 1 has been amended accordingly.

		Table 4 does not make sense, it should include the different impact grading values as headings under the 'scale of change' – 'major', 'moderate' etc.?	Y	Accepted. Table 4 has been amended. Row added to include scale of change headings.
R15	17	In relation to Westminster World Heritage Site there should be a reference to the need to carry out a Heritage Impact Assessment in line with the ICOMOS Guidance (which is currently being updated).	Y	Accepted. Para 3.58 has been amended. With development affecting the setting of the Westminster World Heritage Site designers should carry out a heritage impact assessment also referring to the following guidance documents:
R16	1	Somewhere in this section should include more specific guidance on how to balance the needs of daylight/sunlight, energy efficiency and overheating, particularly in flats and tall buildings.	N	No change. These matters are all covered in detail in Part 2 of is document.
R17	1	The examples of good non-residential development are not appropriate. "Visual interest" should in general be provided by subtle variations on the existing streetscape, not jarring wall art and arbitrarily coloured plastic cladding.	Y	We have refreshed the illustrations and images through out the document.
R18	1	While agreeing with the statement "Occasionally the authentic reproduction of historic architectural styles may be the preferred response", generally a contemporary approach should be encouraged, even for homes within an area with a predominant historical style. It's 2020 - we should have moved on from the design patterns of over 100 years ago.	N	Noted. No change. The Council's design policies express no strong preferences in terms of the style of development and it would be inappropriate to do so here. Designers / clients must have a degree of freedom to pursue designs which they consider an acceptable response to context.
R19	1	This document was written by architects, not ordinary people. Ordinary people like historic looking buildings. The reason ordinary people oppose most new buildings is because ordinary people find them ugly. Ordinary people think St Paul's Cathedral is beautiful, and terminal five at Heathrow is ugly. Please take another look at paragraph 3:12. Simple designs can be ugly. Ornate designs are often beautiful. Developers should do more than consider fine	N	See response to R18 1

		detailing and architectural enrichment, it should be a priority in all developments. Paragraph 3:13 says that occasionally the authentic reproduction of historic architectural styles may be the preferred response. No, it should always be the prefered response. People like old buildings more than new buildings. Please could we have more buildings which look classic, and fewer which are trying to be fashionable. If more buildings were authentic historical reproductions then there would be less opposition to new building.		
R20	1	How can new buildings such as the one in the following link possibly adhere to the "Tall buildings" guidelines, primarily those relating to: http://www.brixtonbuzz.com/2020/02/hondo-enterprises-plan-huge-ugly-tower-block-in-the-centre-of-brixton/ 1. Consider the impact of the building in near, medium and distance views and take particular care to ensure that the building massing and form are successful in each context. --> Just look at the visual impact shown here on the current low-rise background of Brixton (in that direction anyway). 2. Guard against outcomes that loom uncomfortably over existing low-rise neighbours --> Looming over not only it's neighbours but the entire town centre. 6. Mitigate against potential adverse impacts – wind, micro-climate, daylight and sunlight etc. through design excellence. --> a building this tall has huge impact on sunlight on a very large circumference.	N	Noted. This is a live planning case not relevant to the SPD content.
R22	18	General Approach to New Buildings New development should be consistent with net-zero standards, with no to limited retrofit requirement in the future. Flooding and overheating should be material considerations in the overall design of the property.	Y	Accepted. We have added reference to policies EN3, EN4 and EN5 in para 3.1: 3.1 Policies Q5 (Local Distinctiveness), Q6 (Urban Design), Q7 (New Development) of the DRLLP focus on the quality and character of new development. Policy Q5 is supportive of

				development that seeks to sustain and reinforce positive aspects of local character, Policy Q6 seeks development that responds positively to the existing spatial context and improves upon it where possible, Policy Q7 seeks to ensure that new buildings are of design quality, responsive to established and emerging local character, are built in durable materials and are attractive. For more information on Lambeth's character/local distinctiveness see para 1.11 and Lambeth's Local Distinctiveness Study, 2012. Policies EN3 (Decentralised energy), EN4 (Sustainable Design and Construction, EN5 (Flood Risk) focus on the sustainable principles of new development. Policy EN3 seeks development of major schemes to connect or extend existing decentralised energy networks in vicinity of site where possible or explore alternative options. Policy EN4 seeks to ensure all development to meet high standards of sustainable design and construction. Policy EN5 is supportive of development which minimises the impact of flooding in the borough.
R22	19	Arrangement of buildings 3.7 Bullet 1. Can we include a point on air quality: "*Minimise adverse impacts on air pollution – both in street canyons and open roads – through building configuration and effective use of green infrastructure"* *or if this part focuses on arrangement only i.e. canyons only: "Minimise adverse impact on street canyons through building configuration and effective use of green infrastructure."*	Y	Accepted. This point has been addressed see response to R22 comment 12. We have also added bullet point 9 to what is now para 3.9 9. 'Mitigate against poor air quality and noise pollution when orientating blocks.'

R22	20	Sustainability 3.9 Can we include a reference to Local Plan policy EN3 for district heat networks, these are critical to lowering emissions.	Y	Accepted. See para 3.2
R22	21	Community Facilities (schools, colleges, places of worship etc) 3.41 Can we add a point suggesting the location of outdoor spaces are positioned away from sources of poor air quality such as busy roads?	Y	Accepted. We have added new bullet point 5 at what is now para 3.66. '5. Orientate outdoor amenity spaces to be positioned away from sources of poor air quality and noise such as busy road.'
R23	43	3.1 INCLUDE REFERENCE TO EN4 AND LONDON PLAN REQUIREMENTS FOR NET ZERO	Y	Accepted. Following has been inserted at 3.15 3.15 To achieve the borough-wide target of net zero carbon emissions by 2030 and to adapt the borough to a changing climate, the highest standards of sustainable design and construction are expected (see policy EN4). The zero carbon target should inform all aspects of design, construction and operation of new developments.
R23	44	3.3 ADD TO BULLET 1: Calculate the carbon emissions impacts of demolition and redevelopment relative to retrofitting existing buildings	Y	BULLET 1 of para 3.3 has been amended to read: ~~Weigh the pros and cons of redevelopment (including environmental considerations) when deciding on whether or not to clear an existing site of buildings~~. Consider the carbon emissions impacts of demolition and redevelopment relative to retaining and retrofitting the existing buildings.
R23	45	3.4 ADD TEXT: "This can include [the creation of canyons and exacerbation of urban heat island effect]…"	Y	Para has been amended to read : 3.4 Designers should guard against over development by ensuring the development capacity of the site

				is optimised and not exceeded. Over development, especially at high density, leads to poor outcomes not just on site but for the wider community. This can include poor environmental quality (such as of the urban heat island effect, insufficient amenity spaces, poor daylight sunlight, and ~~or~~ excessive pressure on public realm and infrastructure. Designers need to be able to show how they have achieved optimum density. The first step is ensuring all established planning policy and other development / sustainability standards are met.
R23	46	3.7 ADD BULLET: Minimise adverse impacts on air pollution – both in street canyons and open roads – through building configuration and effective use of green infrastructure	Y	In what is now para 3.9:BULLET 8 has been amended to read: ~~Minimise adverse impacts on the urban heat island.~~ Mitigate against poor environmental quality (the urban heat island, solar gain, and air pollution etc.) through building configuration and effective use of green infrastructure.
R23	47	3.7 ADD BULLET: Consider solar gains in the orientation of buildings	Y	See change under R23 46
R23	48	Delete 3.9 and insert the following: 3.9 To achieve the borough-wide target of net zero carbon emissions by 2030 and to adapt the borough to a changing climate, the highest standards of sustainable design and construction are expected (see policy EN4). The zero carbon target should inform all aspects of design, construction and operation of new developments. **Circular Economy**	Y	Accepted. All the proposed text has been added but the paragraph numbers have changed ~~3.9 Policy EN4 sets out the environmental performance standards for development. The Council considers these standards to be compatible with the delivery of high quality design outcomes.~~

		3.10 A circular economy is one where products and materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The aim is to minimise the use of resource inputs and the creation of waste, pollution and carbon emissions. For the built environment, a circular economy means prioritising retention and refurbishment over demolition and rebuilding. It means designing buildings that can be adapted, reconstructed and deconstructed to extend their life and that allow components and materials to be salvaged for reuse or recycling. 3.11 As per policy EN7, applicants for developments of all scales are encouraged to incorporate the circular economy principles to reduce, reuse and recycle at the design, construction and operation phases. Figure XX – Circular economy 'decision tree' (https://www.london.gov.uk/publications/circular-economy-statement-guidance)		3.15 To achieve the borough-wide target of net zero carbon emissions by 2030 and to adapt the borough to a changing climate, the highest standards of sustainable design and construction are expected (see policy EN4). The zero carbon target should inform all aspects of design, construction and operation of new developments. **Circular Economy** 3.10 A circular economy is one where products and materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The aim is to minimise the use of resource inputs and the creation of waste, pollution and carbon emissions. For the built environment, a circular economy means prioritising retention and refurbishment over demolition and rebuilding. It means designing buildings that can be adapted, reconstructed and deconstructed to extend their life and that allow components and materials to be salvaged for reuse or recycling. 3.11 As per policy EN7, applicants for developments of all scales are encouraged to incorporate the circular economy principles to reduce, reuse and recycle at the design, construction and operation phases. Figure XX – Circular economy 'decision tree' (https://www.london.gov.uk/publications/circular-economy-statement-guidance)
R23	49	3.11 Insert image 'strategies for maximising residual value'	Y	Accepted. Illustration added. It is Figure 2 on page 8

R23	50	Insert the following new text **Whole Life-Cycle Approach** 3.12 Taking a whole life-cycle approach means considering the carbon emissions of a building at all stages from inception to completion and dismantling. A buildings whole life emissions are generally split into 'operational' and 'embodied' emissions. Operational carbon emissions are associated with the in-use operation of the building, such as the heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment, and lifts. Embodied carbon emissions are associated with the following stages: • Product: extraction and processing of materials, energy and water consumption used by the factory and transport of materials and products. • Construction: building the development. • In-use: maintenance, repair, refurbishment, replacement and emissions associated with refrigerant leakage. • End of life: demolition, disassembly waste processing and disposal of any parts of product or building. • Transport: any transportation relating to the above. A whole life-cycle approach considers embodied and operational carbon emissions. The purpose of using a whole life-cycle approach is to encourage buildings that generate the lowest carbon emissions over their whole life.		Accepted. All the proposed text has largely been added with the exception of the policy repetition which is considered unnecessary. Note the paragraph number changes. **Whole Life-Cycle Approach** 3.19 Taking a whole life-cycle approach means considering the carbon emissions of a building at all stages from inception to completion and dismantling. A buildings whole life emissions are generally split into 'operational' and 'embodied' emissions. Operational carbon emissions are associated with the in-use operation of the building, such as the heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment, and lifts. Embodied carbon emissions are associated with the following stages: • Product: extraction and processing of materials, energy and water consumption used by the factory and transport of materials and products. • Construction: building the development. • In-use: maintenance, repair, refurbishment, replacement and emissions associated with refrigerant leakage. • End of life: demolition, disassembly waste processing and disposal of any parts of product or building.

		3.13 All developers are encouraged to follow the principles for reducing whole life-cycle carbon emissions. 3.14 In accordance with Policy SI2 of the London Plan, "development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions."		• Transport: any transportation relating to the above. 3.20 A whole life-cycle approach considers embodied and operational carbon emissions. The purpose of using a whole life-cycle approach is to encourage buildings that generate the lowest carbon emissions over their whole life. 3.21 Designers are encouraged to follow the principles for reducing whole life-cycle carbon emissions.
R23	51	Insert the following: **Energy Hierarchy** 3.15 As per policy EN4, all major new developments should be net zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy: 1. be lean: use less energy and manage demand during operation 2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly 3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site 4. be seen: monitor, verify and report on energy performance.	Y	Accepted. The text has largely been replicated **Energy Hierarchy** 3.22 As per policy EN4, all major new developments should be net zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy: 1. be lean: use less energy and manage demand during operation 2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly 3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site

		3.16 Where possible, the zero carbon target should be fully achieved on site and in accordance with the above energy hierarchy (i.e. minimising energy demand as much as possible before considering renewables). Only where it is clearly demonstrated that the zero carbon target cannot be fully achieved on site should offsetting be considered (further details available in policy SI2 of the London Plan). 3.17 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. 3.18 All developers are encouraged to apply the principles of the energy hierarchy and aim to achieve net zero carbon emissions. Figure XX – The energy hierarchy and associated targets (from London Plan)		4. be seen: monitor, verify and report on energy performance. 3.23 Where possible, the zero carbon target should be fully achieved on site and in accordance with the above energy hierarchy (i.e. minimising energy demand as much as possible before considering renewables). Only where it is clearly demonstrated that the zero carbon target cannot be fully achieved on site should offsetting be considered (further details available in policy SI2 of the London Plan). 3.24 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. 3.25 Designers are encouraged to apply the principles of the energy hierarchy and aim to achieve net zero carbon emissions.
R23	52	Insert image: The energy hierarchy and associated targets (from London Plan)	Y	Image has been inserted. This is Figure 3 on page 9
		Reducing Embodied Carbon 3.19 Embodied carbon emissions are associated with the following stages: • Product: extraction and processing of materials, energy and water consumption used by the factory and transport of materials and products. • Construction: building the development.		The text has been largely reproduced at the end of para 3.19 Embodied carbon emissions are associated with the following stages: • Product: extraction and processing of materials, energy and water consumption

		• In-use: maintenance, repair, refurbishment, replacement and emissions associated with refrigerant leakage. • End of life: demolition, disassembly waste processing and disposal of any parts of product or building. • Transport: any transportation relating to the above. 3.20 Applicants are encouraged to take measures to reduce embodied carbon emissions where possible. Pages 60-64 of the LETI Climate Emergency Design Guide (https://www.leti.london/cedg) provide guidance for developers in reducing embodied carbon emissions. **Reducing Operational Energy (Be Lean)** 3.21 The first principle of the energy hierarchy is to use less energy. Applicants for developments of all scales must optimise building design to reduce energy demand. 3.22 Pages 48-49 of the LETI Climate Emergency Design Guide (https://www.leti.london/cedg) provide guidance for developers in reducing operational carbon emissions. **Low Carbon Heating (Be Clean)** 3.23 See policy EN3. Priority is for connection to and extension of existing decentralised heating networks. Development proposals that cannot immediately connect to an existing heating network should follow the heating hierarchy set out in London Plan policy SI3 (D). 3.24 For developments that cannot connect to a local existing or planned heat network, applicants for both minor and major developments are strongly encouraged to use heat pumps rather than fossil fuel heat. This will be highly beneficial to lifetime carbon savings and improving air quality.		used by the factory and transport of materials and products. • Construction: building the development. • In-use: maintenance, repair, refurbishment, replacement and emissions associated with refrigerant leakage. • End of life: demolition, disassembly waste processing and disposal of any parts of product or building. • Transport: any transportation relating to the above. 3.22 Use less energy and manage demand during operation 3.29 Pages 48-49 of the LETI Climate Emergency Design Guide (https://www.leti.london/cedg) provide guidance for developers in reducing operational carbon emissions. **Low Carbon Heating (Be Clean)** 3.22 See policy EN3. Priority is for connection to and extension of existing decentralised heating networks. Development proposals that cannot immediately connect to an existing heating network should follow the heating hierarchy set out in London Plan policy SI3 (D). **Renewable Energy, Demand Response and Energy Storage (Be Green)**

		Renewable Energy, Demand Response and Energy Storage (Be Green) 3.26 Applicants for development at all scales should consider on site renewable energy sources. Generating renewable energy, for example through the use of solar photovoltaic (PV) panels, is an effective measure to reduce lifetime carbon emissions. However, the use of renewables must follow the energy hierarchy by first reducing the energy demand as much as possible. 3.27 When considering installation of solar PV panels, proposals should: • consider orientation and pitch of panels, as well as shading from nearby buildings or trees to maximise solar gains. • maximise solar availability through their massing and roof design and by selecting heating solutions that limit competition for roof space (for example use of ground source heat pumps in place of air source heat pumps where feasible). • consider use of battery storage (batteries can be used to store the electricity generated for use later when it is needed) to help maximise the proportion of generated electricity from solar PV that can be used on site and reduce wider constraints in terms of connection to the distribution network. 3.28 Pages 86-90 of the LETI Climate Emergency Design Guide (https://www.leti.london/cedg) provide guidance for developers in maximising benefits from renewables via energy storage and demand response. **Monitoring (Be Seen)**		3.27 Designers should consider on site renewable energy sources. Generating renewable energy, for example through the use of solar photovoltaic (PV) panels, is an effective measure to reduce lifetime carbon emissions. However, the use of renewables must follow the energy hierarchy by first reducing the energy demand as much as possible. 3.28 When considering installation of solar PV panels, designers should: • consider orientation and pitch of panels, as well as shading from nearby buildings or trees to maximise solar gains. • maximise solar availability through their massing and roof design and by selecting heating solutions that limit competition for roof space (for example use of ground source heat pumps in place of air source heat pumps where feasible). • consider battery storage (to store the electricity generated for use later) to help maximise the proportion of generated electricity from solar PV that can be used on site and reduce wider constraints in terms of connection to the distribution network. 3.29 Pages 86-90 of the LETI Climate Emergency Design Guide (https://www.leti.london/cedg) provide guidance for developers in maximising

		3.29 London Plan 2021 Policy SI 2 states that "major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London." 3.30 Applicants for minor development are encouraged to follow the same process where possible. As a minimum, it is recommended to introduce smart energy and water metering that will allow occupants to monitor their own consumption of energy and water. **Air Quality** 3.31 Applicants for all development should consider air quality as part of their proposals and assess any impact there may be on local air quality. The impact is to be considered at all stages of the development, from demolition and construction through to operation. 3.32 Developments are expected to minimise increased exposure to existing poor air quality and make provision to address local air quality and promote greater use of sustainable transport modes through travel plans. 3.33 Major developments are required to submit an Air Quality Assessment (AQA). **Urban Greening and Biodiversity** 3.34 See Policy EN1. Green infrastructure includes green spaces and features such as street trees and green roofs that deliver multiple benefits. These include mitigating flooding, sustainable urban drainage, cooling the urban environment, enhancing biodiversity and ecological resilience, improving air and water quality, as well as providing more attractive places for people to encourage walking and cycling, promote play, recreation and social inclusion, and improve mental		benefits from renewables via energy storage and demand response. **Monitoring (Be Seen)** 3.30 London Plan 2021 Policy SI 2 requires the monitoring of energy performance on major schemes. Designers of minor developments are encouraged to follow the same process where possible. For example, by using smart energy and water metering that will allow occupants to monitor their own consumption. **Air Quality** 3.31 Designers should consider air quality as part of their proposals and assess any impact there may be on local air quality. The impact is to be considered at all stages of the development, from demolition and construction through to operation. 3.32 Major developments are required to submit an Air Quality Assessment (AQA). **Urban Greening and Biodiversity** 3.33 See Policy EN1. Green infrastructure includes green spaces and features such as street trees and green roofs that deliver multiple benefits. These include mitigating flooding, sustainable urban drainage, cooling the urban environment, enhancing biodiversity and ecological resilience, improving air and water quality, as well as providing more attractive places for people to encourage walking and cycling, promote play, recreation and social inclusion, and improve

		and physical health and wellbeing. Green infrastructure should be planned, designed and managed in an integrated way to achieve these multiple benefits. 3.35 The Urban Greening Factor (UGF) is required for major development in line with London Plan 2021 Policy G5. For other developments the council will strongly encourage inclusion of urban greening measures. Development proposals should incorporate living roofs and walls where feasible and appropriate to the character and context of the development. **Climate Resilience** 3.36 As per Policy EN3, all development will be required to be resilient to climate change by including appropriate climate change adaptation measures. This may include mitigation of flood risk and the urban heat island effect. 3.37 Building design must consider impact on flood risk. See Policies EN5 and EN6 for guidance on minimising the impact of flooding in the borough. 3.38 Development proposals should minimise adverse impacts of the urban heat island effect through design, layout, orientation, materials and the incorporation of green infrastructure. As a minimum London Plan 2021 Policy SI 4 must be followed. 3.39 Many aspects of building design can lead to increases in overheating risk, including high proportions of glazing and an increase in the air tightness of buildings. Single-aspect dwellings are more difficult to ventilate naturally and are more likely to overheat and should normally be avoided, in line with London Plan 2021 Policy D6 Housing quality and standards. There are a number of low energy measures that can mitigate overheating risk and include solar shading, building orientation and solar-controlled glazing. Occupant behaviour will also have an impact on overheating risk.		mental and physical health and wellbeing. Green infrastructure should be planned, designed and managed in an integrated way to achieve these multiple benefits. 3.34 London Plan Policy G5 requires the Urban Greening Factor (UGF) for major development. Designers of minor schemes are encouraged to include urban greening measures such as living roofs and walls where feasible and appropriate to the character and context of the development. **Climate Resilience** 3.35 As per Policy EN3, all development will be required to be resilient to climate change by including appropriate climate change adaptation measures. This may include mitigation of flood risk and the urban heat island effect. See Policies EN5 and EN6 for guidance on minimising the impact of flooding in the borough. 3.36 Designers should seek to minimise adverse impacts of the urban heat island effect through design, layout, orientation, materials and the incorporation of green infrastructure. See London Plan 2021 Policy SI 4. 3.37 Many aspects of building design can lead to increases in overheating risk, including high proportions of glazing and an increase in the air tightness of buildings. Single-aspect units are not supported by Policy H5 of Lambeth Local Plan

		3.40 Passive ventilation should be prioritised, taking into account external noise and air quality considerations in determining the most appropriate solution. The increased use of air conditioning systems is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect. If active cooling systems, such as air conditioning systems, are unavoidable, these should be designed to reuse the waste heat they produce.		because they are more difficult to ventilate naturally and are more likely to overheat. 3.38 Designers should consider low energy measures that can mitigate overheating risk such as: solar shading, building orientation and solar-controlled glazing. 3.39 Passive ventilation should be prioritised, taking into account external noise and air quality considerations in determining the most appropriate solution. The increased use of air conditioning systems is discouraged as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect. If active cooling systems, such as air conditioning systems, are unavoidable, these should be designed to reuse the waste heat they produce.
R23	53	3.17 'dwelling interiors' ADD BULLET POINT : Optimise energy efficiency of space heating	Y	Accepted. Additional bullet added at 3.43 : Optimise energy efficiency of space heating
R23	54	Para 3.31 – air quality - Include short section on avoidance of canyon effect re. air pollution	Y	Para has been amended to read. 3.59 Good air flow is important as without it air pollution is not dispersed. Conversley, ~~A~~adverse wind impacts can diminish our ability to enjoy public realm and move about comfortably. In order to ensure this doesn't happened and to guard against dangerous outcomes. D~~d~~esigners should design for adequate air flow and:

R23	55	3.41 -ADD BULLET : Efforts should be made to avoid placing outdoor areas in proximity to air pollution sources. Where this cannot be avoided, efforts to made mitigate air pollution sources, and use green infrastructure such as a greenscreens to reduce exposure.	Y	Para 3.66: Bullet added: 7 Avoid placing outdoor play / seating areas in proximity to air pollution sources; and reduce exposure to air pollution sources using green infrastructure such as a greenscreens.
R23	56	3.41 All new non-residential development and non-self-contained residential accommodation must meet BREEAM Excellent	N	That is a requirement of Policy EN4 and does not need to be repeated in guidance
PPLF	8a	Should we not be seeking higher environmental standards performance standards for new buildings?		We cannot ask in guidance anything greater than the policy requirements. However, we have revisited the text to reinforce messages: New para after 3.26. Designers should note that the requirements of Local Plan Policy EN4 around energy efficiency and minimising greenhouse gas emissions are *in addition* to those in London Plan Policy SI2.
PPLF	8b			Para 3.31 has been revised to read: 3.31 In order to comply with London Plan Policy SI1, designers should consider air quality as part of their proposals and assess any impact there may be on local air quality. The impact is to be considered at all stages of the development, from demolition and construction through to operation. See Section 9 of the Local Plan.
PPLF	8c			The text has been refined:

				3.36 Designers should seek to minimise adverse impacts of the urban heat island effect through design, layout, orientation, materials and the incorporation of green infrastructure. See London Plan 2021 Policy SI4 (managing heat risk).
PPLF	8d			A new para has been inserted: 3.16 Designers should remember that from 2025 the government's *Future Homes and Buildings Standard* will complement the Building Regulations to require that new homes will produce 75-80% less carbon emissions than homes delivered under current regulations.

PART 4 – (DESIGN ADVICE FOR) BUILDING ALTERATIONS AND EXTENSIONS

Respondent no.	Comment no	Comment	Accepted Y or N?	Edit
R4 Stockwell Park Residents' Association	1	4.12 / 4.13 Window Replacement "to comply with the building regulations replacement windows should be double glazed, although there are exemptions for statuary listed buildings and historic buildings in conservation areas to preserve historic windows." The Stockwell Park Resident's Association oppose the exemptions for statuary listed buildings in conservation areas. In Conservation Areas, buildings including Grade II listed, should be allowed to have double glazing (with below conditions) to reach climate targets. Timber frames, glazing bars will need to accurately replicate original and thickness of glazing bars and accurately match the appearance of original windows, their frames glazing bars and reflective qualities of the glass. Stick on glazing bars need to be avoided. Suggested text 4.12 / 4.13 Window Replacement The Stockwell Park Resident's Association oppose the exemptions for statuary listed buildings in conservation areas. In Conservation Areas, buildings including Grade II listed, should be allowed to have double glazing (with below conditions) to reach climate targets.	Y	Part accepted. The exemptions are established feature of the national Building Regulations. They are not something we can change at local level. We have added additional text at the end of what is now para 4.14 <u>For Window replacements on heritage assets please see Historic England's best practice guidance 'traditional windows: their care, repair and upgrading, 2017'.</u>

		Timber frames, glazing bars will need to accurately replicate original and thickness of glazing bars and accurately match the appearance of original windows, their frames glazing bars and reflective qualities of the glass. Stick on glazing bars need to be avoided.		
R7	3	In relation to extensions to existing buildings, developers may require agreements with Thames Water where the works are in close proximity or over existing water mains or sewers. It could be beneficial for reference to be made to the potential need for agreements with Thames Water within the document. Further details on the need for agreements can be found at: https://developers.thameswater.co.uk/Domestic-and-small-commercial/Building-near-pipes	Y	Accepted. New para. Has been added: "4.43 Below ground utilities should be surveyed when extensions are proposed. Thames Water provides online advice on these matters see link. https://developers.thameswater.co.uk/Domestic-and-small-commercial/Building-near-pipes"
R8	18	**Overview and General Advice:** In the latest revision of policy Q11 (paras c and d) we welcomed that a distinction has finally been made between the built forms of early and late 19th century housing development. Past guidance has focussed on what suits late 18th/ early 19th century properties, which can be inappropriate and even counter-productive when slavishly applied to the late-19th century and 20th century buildings which are more numerous in the centre and south of the borough.	N	Noted
R8	19	In paras 4.20 to 4.23, the first consideration in the acceptability of roof terraces and balconies should be the impact on neighbours in respect of overlooking or noise.	Y	Accepted Additional text added: 4.21 <u>The addition and design of balconies must be carefully considered to avoid adverse impacts on neighbouring properties in respect of overlooking and noise.</u> <u>Where new balconies are considered acceptable on amenity grounds the Council will expect the design (including doors and balustrades) to be appropriate for the character of the host building; which may mean a traditional approach on traditional buildings.'</u>

				At para 4.25 we have add additional bullet 3 3. Avoid unacceptable overlooking into neighbouring properties.
R8	20	Roof terraces above existing projecting shopfronts are generally welcome, as neighbours are less likely to be concerned about overlooking.	N	Noted
R8	21	Green roof construction should be promoted as an alternative for flat roofs where regular resident access is not acceptable.	Y	Accepted. Additional text has been added with new para. after para. 4.36 "4.37 Designers should be mindful of the advice relating to green infrastructure in Part 2 of this document when designing extensions especially in relation to flat roofs." See schedule for Part 2 to explain the content.
R8	22a	The use of render (plain, pebbledashed or painted) is sometimes necessary to match in with existing surfaces (para 4.25 point 5). Consideration should be given to the use of external wall insulation with a decorative render finish where existing render requires renewal.	Y	Accepted. New para added "4.30 Policy Q5 generally discourages the use of render because it does not perform well and requires regular maintenance. Where render needs to be replaced a through colour mix is encouraged to avoid the need for regular re-decoration.
R8	22b	This issue is not confined to basements, so para 4.112 should be moved to this section	Y	Accepted. Content has been moved. See para 4.120 See response R23 29
R8	23	**Conversions:** There is an overhang of Victorian and Edwardian houses which are too large and unwieldy for modern family occupation, but capable of adaptation and continued use.	N	No change, the existing text is considered adequate when read in conjunction with Parts 1 and 2 of this document which includes guidance outlining the qualitative requirements for all development.

		They generally make a positive contribution to the street scene, and we will be receptive to conversion proposals, but we suggest our criteria are better than those listed in para 4.28: • The original character should be maintained; • The new self-contained dwellings should be satisfactory units; • Regard must be paid to fire precautions and sound-proofing. In particular, stacking of living rooms or kitchens over bedrooms should be avoided. • Sufficient consideration must be given to common parts and amenities such as refuse storage. Too often these are afterthoughts. • Provision of external amenity space for each dwelling should be encouraged. Any balconies or roof terraces should respect neighbours' privacy and conform to paras 4.20-4.23 above. Communal gardens will be acceptable.		
R8	24	**Extensions:** (paras 4.36-4.4.63) In para 4.37, there is some confusion over the term "addition". By the 1840s, rear projections were generally an integral part of the original floor plan, rather than an afterthought. They tended to increase in size up to 1914, culminating in Edwardian terraces four rooms deep on a narrow frontage. Even from the mid-1870s, two-storey terraces with three-storey rear wings are a common pattern in Central Lambeth. Historically therefore, it is only appropriate to insist on rear extensions being lower than the host for late 18th/ early 19th century properties. (Para 4.38 and Fig.3 refer).	N	No change. The existing advice on para 4.38 reflects the wording in Policy Q11 (c) (v).
R8	25	For **full-width rear extensions** (paras 4.48-4.50) the main consideration is to maintain adequate daylight into the rear of the original building. This can be achieved by roof windows, or	Y	Noted

		lantern lights for flat roofs, strangely absent from Fig.7. The stepped rear wall is unduly fussy for the two-storey post-1914 house illustrated. It might be appropriate for a taller terrace of earlier date which is a heritage asset. Even then, the rear elevations tended to be accidental rather than considered designs.		
R8	26	**Glazed Extensions and Bays** (para 4.51-4.53) Para 4.51 needs to be more closely integrated with references elsewhere in the document to "winter gardens" (paras 2.31 and 2.56). They may be appropriate where air quality or ambient noise make open balconies or roof terraces unattractive to residents.	N	No change. Winter gardens are not a common feature of conversions / extensions and guidance on them is already in Part 2.
R8	27	We were surprised that the SPD offers no guidance on **bay windows**. Early 19th century ribbon development includes some examples of semi-circular bay windows at the rear of houses. Canted or rectangular bays are more usual on Victorian and Edwardian houses, mainly at the front. New or replacement bays should normally be appropriate to the style of the original house, though more latitude should be allowed at the rear.	Y	Accepted. Add new bullet 7 to what is now Para. 4.16 7. Retain bay windows and other feature windows such as oriels.
R8	28	**Side Extensions** (paras 4.54-4.57) The underlying policy is muddled in its objectives. We would support the retention of ground level side access to a rear garden, though this would be better through a solid side gate or garage door on security grounds. We see no general objection to a room being added above this, unless it would obstruct daylight to an adjacent property or degrade a distinctive streetscape in a conservation area.	N	Noted. We can't change the policy position. The advice aligns with Policy Q11.
R8	29	Visually, the lower example in Fig.8 is preferable to the upper picture, where the flank wall above the mid-point of the ground	N	Noted. The illustration is considered sufficient for the purposes of explaining the policy requirements in terms of side space.

		floor window adds needless structural complexity. More creative solutions with the roof angled back from the boundary may also be acceptable.		
R8	30	**Lambeth's Roofscape:** (paras 4.64-4.71) **London roofs:** Referring to para 4.65, the upper illustration shows a typical London roof of c.1870, the more numerous type. The lower illustration appears to be from c.1810, when the form was more often used to hide cheaper roofing materials such as clay pantiles.	Y	Accepted. The captions have been edited (see Part 4 page 30)
R8	31	**Chimneys:** In para 4.71, in most cases it would be acceptable to reduce chimneys in height, on safety grounds, but complete removal should be discouraged. In Victorian and Edwardian terraces with deep plans, the chimney breasts on party walls provide useful buttressing for stability.	N	Not accepted. The loss of chimneys generally has an adverse impact. For clarity additional text has been added at what is now para 4.81: <u>Whilst internal chimney breast removal is common care should be taken in relation to structural impacts. The Council generally discourages the removal of exterior chimneys given the adverse effect it has on roofscape character.</u>
R8	32	**Roof Alterations - Dormers:** (paras 4.72-4.86) In para 4.74, the replacement of original dormers by roof windows should be discouraged – reinstatement of original features is preferred.	Y	What is now para 4.87 includes *Where dormers are an integral part of the character of a building* *their loss or unsympathetic alteration will generally be resisted.*
R8	33	At the front, the upper storey of a typical Victorian terrace has a large window or bay, together with a smaller window directly above the front door. With a London roof, there is usually a substantial cornice to provide visual separation from a new attic storey, so two equal dormers with equidistant spacing would be our preferred solution.	N	Noted

		Alternatively, a wider central dormer, as in the right-hand illustration below para 4.77, would be acceptable in most cases.		
R8	34	In para 4.79, while we can accept dormer window heads conforming to a height of 2.1m above floor level, the room ceiling should be higher where possible. This is to avoid creating mean and sub-standard accommodation with poor ventilation.	Y	Accepted. Bullet point 2 para 4.89 has been amended. 2. Have a window cill that rests on the roof slope (around 1 metre above the attic floor level or 1m above eaves level if the floor has been lowered) and a dormer head ~~running flush with the room ceiling height (normally~~ at ~~)~~ 2.1m ~~)~~ above floor level.
R8	35	**Roof Extensions:** (paras 4.87-4.106) Roof additions and mansards should not introduce built forms which are discordant. In recent years, planners have ignored the text of existing policies and allowed many mansard extensions on late Victorian houses in forms which would only be appropriate on early 19th century properties. Although Victorian builders seem to have tried every conceivable shape, the most common form for an original attic storey has front and rear slopes at 70 to 80 degrees pitch, behind parapets, but then a more-or-less flat top in lead, zinc or copper roofing.	N	Noted
R9	8	We welcome the clear guidance as to what will and will not be acceptable with regards to heritage assets.	N	Noted
R9	9	Paragraph 4.9 – we very much welcome the emphasis upon property maintenance. This is the most sustainable, cost efficient and effective was of managing buildings.	N	Noted
R9	10	It appears that there may be an inaccuracy with some of the diagrams. Please so check them all. For example, figure 15 shows all the roof extensions as acceptable with a green tick, when the same diagram in figure 11 of the current Building Alterations and Extensions SPD (2014) shows the first 3 as	Y	Accepted. All the illustrations have been revisited and better aligned with the text.

		unacceptable – we would concur with the 2014 diagram that these are unsympathetic examples to be discouraged.		
R9	11	There also appears to be an inaccuracy with figure 8 showing rear roof lights. Presumably the intention is to show the roof lights aligning. Figure 9 of the 2014 SPD uses the same diagram with the 3 mismatched roof lights on the third property being marked as unacceptable, in the draft documents they are all shown as acceptable, again we would agree with the 2014 advice.	Y	Accepted. All the illustrations have been revisited and better aligned with the text.
R11	16	**Gardens -** We agree that front gardens should be protected against impermeable car parking. However, this should be in aid of supporting sustainable urban drainage, rather than because it results in the loss of on-street parking.	Y	Noted.
R15	18	Figure 2 is too small and a little blurred.	Y	Accepted. All the illustrations have been revisited and better aligned with the text.
R15	19	Paragraph 4.29 "Shop and Pub Conversions" There is often a land use issue with the principle of this type of change of use. To provide clarity it would be useful to include: *"Where the conversion of shop or pub premises are acceptable in principle..."*	Y	Amended text now at para 4.35 '<u>Where the conversion of shop or pub premises are acceptable in principle,</u> design ingenuity should allow for the sensitive retention of such shop fronts while ensuring the provision of high quality conversions.'
R15	20	Typo on page 22 – should be "Rear <u>Extensions</u> – Returns"	Y	Accepted. Rear ~~Externsions~~ <u>Extensions</u> - Returns
R15	21	Figure 4 is out of place after Paragraph. 4.44. It should be moved and a narrative for 'Two-Storey Rear Extensions' added. Indeed, a little more advice on two storey rear extensions generally might be useful.	Y	Accepted. We have updated all of the figures.
R15	22	Paragraph 4.43 It would be useful to add *"To minimize adverse impact, the party wall of any rear extension should be as low as possible."* (I know it says this later on but sometimes a little repetition brings greater clarity and these are the issues that matter most to neighbours.	N	No change. We are seeking to avoid repetition where possible

R15	23	Paragraph 4.44 "Infill extensions" This paragraph does not mention that Policy Q11(e)(iii) requires infills to be set back from the corner of the main return on heritage assets?	Y	Accepted. Text has been added at end of 4.53 Policy Q11 (e) (iii) requires infills to be set back from the corner of the main return on heritage assets.
R15	24	Paragraph 4.47 states that "*All the extensions stop short of existing corners, to better emphasise their subordination; this need only be a single brick - just enough to retain the corner"* but this is not shown in Figure 6. Is a set-back really necessary?	Y	Accepted. Figure 6 has been amended. Para 4.47 has been amended. "4.56 Figure 6 sets out appropriate extension types for non-designated heritage assets and buildings in conservation areas. Whilst not clear in the illustration, Infill extensions should stop short of existing corners, to better emphasise their subordination; this need only be a single brick - just enough to retain the corner…….gutters."
R15	25	Paragraph 4.47 states "Properties no. 1 and 3 have glazed infills (which is the preferred approach for non-designated heritage assets and buildings in conservation areas) and properties nos. 4 and 5 have end extensions" but the numbers do not marry up to the amended figure 6. It should read, "Properties no. 1 and ***5*** have glazed infills (which is the preferred approach for non-designated heritage assets and buildings in conservation areas) and properties nos. ***3*** and ***6*** have end extensions."	Y	Accepted. Amend text in what is now Para 4.56 … Properties no. 1 and ~~3~~ 5 have glazed infills (which is the preferred approach for non-designated heritage assets and buildings in conservation areas) and properties nos. ~~4~~ 3 and ~~5~~ 6 have end extensions. Although not shown, an infill and end extension may be acceptable in some instances so long as they are both set back from the corner of the original return. Varied roof forms are shown for illustrative purposes only. In reality, roof profiles within terraced groups will be expected to follow a uniform pattern. The party wall to the adjoining property should be as low as possible. Gutters and fascias on party walls should be avoided in favour of parapet gutters.
R15	26	Paragraph 4.48 this should refer to Figure 7 not Figure 6.	Y	Accepted. Amended what is now Para 4.57 replace text referring to Fig. 6 with Fig. 7 'A positive response to the host building is required under Policy Q 11 (a) and subordination is required in Policy Q11 (b). Policy Q2 will also be a key consideration in relation to

				adjoining neighbours. Whilst a simple, full-width box across the rear of a residential property with a glazed elevation to the garden may be the most desirable extension further refinement to terms of the form and treatment will be required where the host building has a stepped rear elevation, especially to non-designated heritage assets and buildings in conservation areas in order to lessen the boxy horizontal effect of the built form and dominant character of the full-width glazing. Figure ~~6~~ 7 shows how stepping the façade and introducing brick piers between the glazing can address this. Whilst 'contemporary' forms contrasting are often desirable they may not be appropriate in every instance. Especially on non-designated heritage assets or on buildings in conservation areas. Full-width extensions are unlikely to acceptable on statutory listed buildings.
7	27	Paragraph 4.59 states "Contemporary materials on modern or innovative design will be supported where the impact on the host building and wider area is not harmful." Often the outcomes of striking modern designs are disappointing as builders can struggle to deliver them. It may be worth adding: *"detailed drawings may be required at application stage to demonstrate the design quality of the proposal".*	Y	Accepted. Additional text added to what is now Para 4.72 *"4.72 Designers should provide as much information on construction detailing and materials as possible up front at application stage; otherwise the application may be delayed whilst further information is prepared or the Council may impose conditions to an approval requiring more information to be submitted. In accordance with Policy Q8 (a) detailed drawings may be required at application stage to demonstrate the design quality of complex or unusual features."*
R15	28	Paragraph 4.61 states "For example, leaving render unpainted and using sustainable hardwoods." It may be preferable to ask for 'through coloured render' than unpainted render as cement render is generally grey and ugly. It is probably also worth stressing that render and timber cladding is unlikely to be accepted in Conservation Areas, unless can be demonstrated that it is a key positive attribute of the conservation area's character and appearance.	Y	Accepted. Final sentence of what is now para 4.70 now reads 'for example, ~~leaving render unpainted~~ use through colour render and using sustainable hardwood cladding.' No change in reference to conservation areas. See response to R8 comment 22

R15	29	There are two Figure 8's. Both are a bit small and faded. Surely the 1st house in the top image and the third house on the bottom image show rooflights that are not policy Q11 complaint?	Y	Accepted. The illustrations have been revisited.
R15	30	Paragraph 4.78 – it's a bit unclear what is meant by dormer window and box dormer. It would be clearer if the properties in fig 11 were numbered to aid cross-referencing with the text.	Y	Accepted. The illustrations have been revisited.
R15	31	Paragraph 4.82 states (see Figure 11) can we specify Property 2 of figure 11.	Y	Accepted. What is now para 4.92 has been amended to read: On small, two storey cottage-type properties (including those in conservation areas) where attic floor space is limited, the linking of two small individual dormers together to make one wide dormer may be an acceptable way of increasing head-room (see house B in Figure 11). This option is only acceptable for rear roof pitches and is unsuitable for heritage assets. Designers should:.
R15	32	Paragraph 4.83 states " An inset dormer is shown in Figure 11. As inset dormer are formed by cutting into the roof slope they…" could this be amended to clarify "An inset dormer is shown on Property 3 of Figure 11. As inset dormer***s*** are formed by cutting into the roof slope they…"	Y	Accepted. Accepted. What is now para. 4.93 has bene edited to read: An inset dormer is shown in Figure 11(C).
R15	33	Paragraph 4.84 could this be amended to clarify, "***Property 4*** in Figure 11 below shows a horizontal 'box' dormer, set well in from the edges of the roof to achieve subordination (aligned with the outer edge of the windows below). Box dormers must be set well in from the edges of the roof to achieve subordination (aligned with the outer edge of the windows below), set down from the ridge and set up from the eaves to ensure that a significant proportion of the original roof slope remains visible".	Y	Accepted. What is now para. 4.94 has been amended ~~In~~ Figure 11(D)
R15	34	Paragraph 4.85 "L-shaped Dormers" states "These are roof extensions that extend out over the roofs of rear returns and	Y	No change in response to comment as it unlikely a L-shaped dormer would come forward without a mansard.

		are generally attached to rear mansards." Could this be amended to clarify that they can only be attached to the rear of mansard extension as full width box dormers are not acceptable?. Perhaps "L-Shaped dormers are roof extensions that extend out over the roofs of rear returns. They will only be acceptable where attached to rear mansards and meet the requirements of Paragraph 5.93 below."		. However, we have addressed a typo error Para 4.85 not references 4.95: 'These are roof extensions that extend out over the roofs of rear returns and are generally attached to rear mansards. See mansard advice at para ~~5~~4.97.'
R15	35	Figure 12 – should the extension on the right hand side illustration not be set in from the eaves of the rear return?	Y	Accepted. The extension on the right hand side is a bad example and a cross has been added to show this.
R15	36	Paragraph 4.91 "L-Shaped Dormers". The new advice on L-shaped dormers to mansard extensions is welcome - it is a good idea especially for those wanting to improve their homes and there is a greater likelihood that they will be consistent across multiple properties. The supporting text should include a caveat that amenity issues in terms of outlook and daylight for neighbouring occupants might mean the 'L-shape' dormer is not appropriate. It would be useful to include some advice on whether side windows/dormers are acceptable on L-shaped roof extensions (or whether they should be obscure glazed to 1.7m to prevent overlooking. Indeed, advice on side dormers (on detached and semi-detached houses) would be useful.	Y	Accepted. An additional bullet has been added: 7. Ensure no unacceptable impacts on neighbouring amenity and daylight which includes overlooking from new windows.
R15	37	Paragraph 4.91 (3) requires "a vertical elevation at the end (flush with the end of the return and a flat roof)". Figure 14 does not show windows on the long side of the L-shaped dormer. If they are unacceptable it should be stated in Paragraph 4.91 bullet 6. An additional bullet 7 would be useful to address amenity issues. For example L-shaped dormers on long Victorian returns might have a greater impact in terms of overshadowing to neighbours – depending on orientation. In those cases the dormer may have to be truncated.	Y	Accepted. We have also refreshed the illustration at Figure 14 for greater clarity. See also response to R15 comment 36

R15	38	Paragraph 4.96 – 'The advice is illustrated in Figure….' seems to be in the wrong place. The reader might be misled that it refers to the preceding text	Y	Accepted. Moved Fig. 15 moved adjacent to the relevant text
R15	39	Paragraph 4.93 refers to a 'half hip' solution. Readers might not know what this is. The Image on that page shows a full hip to gable. An illustration might be useful here to provide clarity.	N	A half hip is shown in Figure 15. This is considered sufficient.
R15	40	Figure 15 Unacceptable examples need to be highlighted in red on the illustrations. This is very clear in the existing SPD (2015).	Y	Accepted. Ticks and crosses have been added to Figure 15.
R15	41	Figure 16 is a duplicate of Fig 13. I suspect this is an error.	Y	Accepted. Fig 16 has been omitted as it was a duplicate.
R15	42	Paragraph 4.99 additional text would be useful: *"A high level of detail will be required to be submitted at application stage to demonstrate that this approach is acceptable. This might include detailed sections through the junction between the old and the new floor and samples of the specific materials to demonstrate a good match".*	N	No change. This level of detail is unnecessary at application stage as it can be required via a condition attached to an approval.
R15	43	Page 57 – the two bottom right photos appear to be of different properties/facades (see window shape, balconies/ red brick banding)	Y	Accepted. The annotation has been corrected to reflect this
R15	44	Paragraph 4.116 "Equipment" More sustainable alternative such Air Source Heat Pumps will become increasingly popular a gas boilers are phased out. A reference to ASHP units would be useful.	Y	Accepted. Para 4.134 amended to include reference to Air Source Heat Pumps (ASHP). 'Energy consumption can be significantly reduced by using efficient appliances and equipment. Designers should carry out an energy audit to identify current consumption; smart meters (gas, water, electricity) can assist with this. Measures to reduce energy consumption can include the installation of a condensing boiler, air source heats pumps (ASHP), efficient appliances and using low energy lighting. Water efficient toilets, taps and shower heads can also significantly reduce water usage. When it comes to new boilers, care needs to be taken to ensure that flues are not on front or other visible elevations; Policy Q11 (a) (ii) needs

				to be considered. New systems need to be user friendly to be effective.
16	1	I disagree with the updated SPD's stronger opposition to new mansards on heritage assets with London roofs (now "not acceptable", vs "will be resisted" in current version), and believe that it should instead be made more flexible ("carefully considered"). Well-designed mansards can be subtle, attractive and sympathetic additions to many buildings of this type, and provide badly-needed additional accommodation with less environmental harm and disruption to neighbours than digging down or extending back. In historically wealthier areas of London these extensions are commonplace; no one complains that Pimlico, Mayfair and Belgravia have lost their historic character because of mansards.	N	No change. The SPD reflects best practice. London roofs are locally distinct and thus protected under Local Plan Policy Q5 (local distinctiveness) and is often a key component of heritage assets such as conservation areas and listed buildings.
R22	22	General Advice Duplicate comment from Part 1: Can we say something about energy performance / key challenges in terms of climate change mitigation and adaptation e.g. solid wall construction tends to be very energy inefficient and requires fairly significant retrofit to insulate properly. This will increasingly be a challenge we need to deal with over the coming decade so we need to have a clear stance and clear guidance to support retrofit in appropriate ways.	Y	Accepted. See new para 4.8
R22	23	Window replacement 4.12 Are there examples where replacement windows can be double glazed while also preserving the conservation and building history? It seems double glazing isn't an option should it be?	Y	Part accepted. The exceptions referred to in 4.14 are national and part of the building regulations. We have revisited the text and provided a link to the Historic England best practice at the end of 4.14 For window replacements on heritage assets please see Historic England's best-practice guidance 'Traditional Windows: their care, repair and upgrading, 2017. https://historicengland.org.uk/images-books/publications/traditional-windows-care-repairupgrading/

R22	24	New balconies on existing buildings 4.21 Balconies should not be positioned where they expose users to poor air quality.	N	Accepted. We have added additional text at the end of what is now para 4.24: Balconies should not be positioned where they expose users to poor air quality.
R22	25	External materials 4.24 In some cases external wall insulation is the only option for older properties and can be carried out in a way that is sensitive to the appearance of buildings.	Y	Accepted. In what is now para 4.29 Bullet 5 has been rewritten to show that the requirement is largely related to built heritage: 'Avoid the rendering or cladding (stone, tile, timber etc.) of heritage assets including buildings in conservation areas which would result in~~,~~ the covering up of original features. For guidance on insulating render please see Para 4.120'
R22	26	Extensions Detailed Advice 4.59 Can we add a comment that extensions and conversions are built with the highest energy efficiency possible.	Y	Accepted. New heading added . 4.73 Designers should not overlook the requirements of policy EN4 (b) which requires high standards of sustainable design and construction.
R22	27	Roof Alterations 4.72 Does this apply to solar panels and air source heat pumps (i.e. renewable energy generation) when they are required on the roof?	N	Yes, the requirements of policy Q11 (a) covers these matters. This document cannot stray from the policy requirements. However, in the vast majority of domestic dwellings this work will be permitted development
R22	28	Living Roofs 4.106 Can we alter it to be more supportive of green and blue roofs?	Y	Accepted. Text add '4.116 Green/brown roofs are supported as they can be very efficient in slowing rainwater run-off, providing new habitats for wildlife in urban areas, helping to reduce heat loss and reduction in energy use and can be visually attractive. Careful consideration will need to be given to ensure that such roofs, when added to existing buildings, are well integrated architecturally and cause no harm to the wider context.'

R22	29	External insulation 4.110 Can we rephrase this to "This approach is essential to retro-fit Lambeth's Victorian solid wall housing but should be installed in a way that is sensitive to buildings appearance.	Y	Accepted. Text added to 4.120 Externally applied insulation normally comprises an insulation layer with a weatherproof finish (render, brick slips, cladding panels). This approach is one of the best ways of thermally upgrading solid wall buildings however requires ~~supported but needs~~ very careful consideration because it can have a significant impact on the outward appearance of buildings, ~~obscuring architectural detailing to ill effect~~ and if not correctly installed, can create problems in its own right in relation to interior condensation and water ingress.'
R22	30	Equipment 4.116 Can we replace this with "the installation of an energy efficient heat pump". We should not be encouraging the installation of conventional boilers in new development due to their emissions.	Y	Accepted. Reference to conventional boilers removed in what is now para 4.134 '4.134 Energy consumption can be significantly reduced by using efficient appliances and equipment. Designers should carry out an energy audit to identify current consumption; smart meters (gas, water, electricity) can assist with this. Measures to reduce energy consumption can include the installation of a ~~condensing boiler~~ energy efficient heat pump, efficient appliances and using low energy lighting. Water efficient toilets, taps and shower heads can also significantly reduce water usage. When it comes to new boilers, care needs to be taken to ensure that flues are not on front or other visible elevations; Policy Q11 (a) (ii) needs to be considered. New systems need to be user friendly to be effective.'
R22	31	Energy Generation 4.118 Can we rephrase this with: "Solar panels/cells tend to be most efficient on unshaded south facing aspects, and are often viable on east and west aspects"	Y	Accepted. What is now Para 4.142 amended. Hyperlink repaired. '~~For highest efficiency of photovoltaic (PV) cells and panelling for solar water heating systems, an unshaded south facing aspect is required, although an unshaded~~

		We should be supporting the use of PV panels on all developments, "they should be designed sensitively with a view to the appearance of the building" 4.120 Hyperlink is broken		~~southeast and southwest aspect can still be viable~~. Solar panels/cells tend to be most efficient on unshaded south facing aspects, and are often viable on east and west aspects. They should be designed sensitively with a view to the appearance of the building"
R22	32	Gardens 4.123 Can we rephrase this to show the council is not supportive of vehicle ownership/use?	N	Not accepted. The wording aligns with planning Policy Q14 in its current form.
R23	57	CHANGE TITLE OF THIS SECTION TO: Buildings Alterations, Extensions and Retrofit	Y	Title on page 4 has been changed to: Building Extensions, Alterations, and Retrofit
R23	58	At 4.7 change title to Building Alterations and Retrofit	Y	Title on page 5 has been changed to: Building Extensions, Alterations, and Retrofit
R23	59	On Page 6 (around para 4.7) New para added: Retrofit and the climate emergency. Text: The UK has the oldest and among the least energy efficient housing stock in the whole of Europe. This is particularly the case in Lambeth, where the most prevalent building type is a pre-1900 terraced house, and over half of domestic floorspace in Lambeth is in buildings constructed before 1929. Domestic energy use is the largest single source of emissions in Lambeth - a significantly larger share than the national average - and building alterations that improve energy efficiency and allow for the installation of low carbon heating will be needed on a large scale if Lambeth is to reduce its emissions and tackle the climate emergency. Further, retrofitting delivers many health benefits from reduced exposure to cold, damp and poor indoor air quality, and can result in significant energy bill savings. It is therefore council policy to support and facilitate retrofit, while ensuring that works are carried out to appropriate standards and are sympathetic to their surroundings. Energy efficiency should be considered as a priority whenever a building alteration is undertaken.	Y	New para added at 4.8 : Title : Retrofit and the climate emergency. Text: The UK has the oldest and among the least energy efficient housing stock in Europe. This is particularly the case in Lambeth, where the most prevalent building type is a pre-1900 terraced house, and over half of domestic floorspace in Lambeth is in buildings constructed before 1929. Domestic energy use is the largest single source of emissions in Lambeth - a significantly larger share than the national average - and building alterations that improve energy efficiency and allow for the installation of low carbon heating will be needed on a large scale if Lambeth is to reduce its emissions and tackle the climate emergency. Additionally, retrofitting delivers health benefits from reduced exposure to cold, damp and poor indoor air quality, and can result in significant energy bill savings. It is therefore best practice to support and facilitate retrofit, ensuring that works are carried out to appropriate standards and are sympathetic to their surroundings. Given the climate emergency, energy efficiency should be considered as a priority whenever a building alteration is undertaken.

R23	60	4.9 - ADD BULLET: Ensure retrofitting works are sympathetic to original designs	Y	new bullet added: Ensure retrofitting works are sympathetic in siting and design to the host building
R23	61	4.12 new BULLET added: Ensure retrofitting works are sympathetic in siting and design to the host building	Y	Para 4.14 has been re-worded 4.14 In some circumstances the replacement of windows is permitted development and does not require planning permission. This can be checked online at www.planningportal.gov.uk. Ideally window replacements should aim to achieve maximum energy efficiency (expressed as a U-Value). To comply with the building regulations replacement windows should be at least double glazed, although there are exemptions for statutory listed buildings and ~~historic~~ buildings in conservation areas to preserve historic windows. The Council will generally expect all windows replacements to sympathetic to the original window design.
R23	62	Para 4.13 REWORD "windows should replicate the appearance" to "windows should be in keeping with the appearance of…"	Y	What is now paragraph 4.15 amended to read: Where the building is part of a terrace or group which shares common window detailing it is especially important that the new windows match the originals that they replace. Similarly, the windows of individual flats are often identical to those within the whole building to give unity of design. In order to protect the character of the building designers should ensure replacement windows should ~~replicate~~ be in keeping with the appearance, detailing and opening type of the originals. ~~This~~ A close match is particularly important on heritage assets. ~~non-designated heritage assets and buildings in conservation areas. If replacement windows for or buildings in conservation areas do not accurately reproduce the originals, permission is likely to be refused and retention of the originals sought~~
R23	63	4.14 REWORD BULLET POINT 6: change "be of the same material" to "be of material which is appropriate to the original..."	N	No change. This would not accord with best practice. Furthermore, historic windows are generally timber which is sustainable to replicate.
R23	64	4.14 ADD BULLET: Maximise energy efficiency	N	No change. The building regulations set the standards that have to be met.

R23	65	Somewhere on page 11 after 4:19 - ADD GUIDANCE ON FITTING WINDOWS FOR MAXIMUM ENERGY EFFICIENCY. SEE: https://www.labc.co.uk/sites/default/files/zch-thermalbridgingguide-screen.pdf	Y	Additional text added: Title: Window Installation Text: 4.21 Window installation should be undertaken with care to ensure that thermal performance is optimised. Further guidance on fitting window for maximum efficiency please see: https://www.labc.co.uk/sites/default/files/zch-thermalbridgingguide-screen.pdf
R23	66	4.21 ADD TEXT: Balconies should not be positioned where they expose users to poor air quality	Y	What is now para 4.24 has been amended to read: Where new balconies are considered acceptable on amenity grounds the Council will expect the design (including doors and balustrades) to be appropriate for the character of the host building, which may mean a traditional approach on traditional buildings. Balconies should not be positioned where they expose users to poor air quality.
R23	-	Various comments already logged		~~Care should be taken with all building alterations to ensure that the external materials are appropriate. Generally a close match will be required to integrate the new works and ensure a seamless finish.~~ Having thought more about the comments made by R23 more broadly we have revisited what was para. 4.24. '4.27 In a number of circumstances replacing / changing the external materials of a building is permitted development and does not require planning permission. For more information, please see www.planningportal.gov.uk. Where planning permission is required, and especially in relation to heritage assets, ~~C~~care should be taken with all building alterations to ensure that the external materials are appropriate. Generally, a close match ~~will be required~~ should be sought in order to integrate the new works ~~and ensure a seamless finish~~.

R23	67	4.25 REWORD BULLET POINT 5: For properties that are already rendered, fitting external wall insulation is permitted. For unrendered brick walls, consider internal wall insulation as an alternative to external wall insulation on the street-facing side of a building. External wall insulation to the rear of a building is encouraged.	Y	A new para has been added 4.28 <u>For properties that are already rendered external wall insulation may be the best retrofit option, although this approach may not be suitable for heritage assets. For guidance on insulating external render please see para 4.120.</u>
R23	68	4.25 ADD SENTENCE AT END of 4.26: Developers should seek to limit carbon emissions by calculating the carbon emissions impacts of demolition and redevelopment relative to retrofitting existing buildings.	Y	What is now para 4.29 has been edited to read: Bullet 5 has been changed to read: Avoid the rendering or cladding (stone, tile, timber etc.) of <u>brick built heritage assets</u> ~~buildings~~<u>,</u> <u>and consider internal insulation solutions for thermal upgrade in those instances</u> ~~the covering up original features~~. <u>More generally, brick elevations to streets and open spaces should be retained. However, the side and rear elevations (not street facing) present an opportunity for external insulation.</u> ~~For guidance on insulating render please see para 5.112.~~
R23	69	4.26 ADD SENTENCE AT END of 4.26: Developers should seek to limit carbon emissions by calculating the carbon emissions impacts of demolition and redevelopment relative to retrofitting existing buildings.	N	No change. This section relates to building alterations and extensions not demolition.
R23	70	ADD NEW PARAGRAPH: As with many London borough's, deployment of solar PV in Lambeth is relatively low compared to other parts of the UK, and the council is keen to facilitate greater deployment in order to tackle the climate emergency.	Y	Additional words added at the start of what is now para 4.74: <u>Deployment of solar PV in Lambeth is relatively low compared to other parts of the UK, and the council is keen to facilitate greater deployment of solar PV technology in order to tackle the climate emergency. In order to achieve this sensitively an understanding of Lambeth's roofscape is particularly important.</u>
R23	71	4.72 ADD SENTENCE: In this respect, the Council will normally resist changes to roofs that would be detrimental to their appearance…This does not apply to solar panels, heat pumps when required to be located on roofs, or other measures needed to decarbonise a property.	Y	The guidance can't exempt proposals from the policy requirements. However, additional text has been added at the start of what is now para 4.82 for clarification

		Such decarbonisation measures should be sympathetic to the building design.		'Some roof alterations benefit from permitted development rights and therefore do not require planning permission. These works can include, in some circumstances, rooflights and solar pv panels. For more information please visit - www.planngingportal.gov.uk . Where planning permission is required, Policy Q11 (a) requires alterations to be respectful of the character of the existing building. ~~In this respect, the Council will normally resist changes to roofs that would be detrimental to their appearance.~~
R23	72	4.106 REPHRASE: Careful consideration will need to be given to ensure that such roofs, when added to existing buildings, are well integrated architecturally and cause no harm to the wider context. Careful consideration will need to be given to ensure that such roofs, when added to existing buildings, are well integrated structurally	Y	What is now para 4.116 has been re-written ~~Green/brown roofs can be very efficient in slowing rainwater run-off, providing new habitats for wildlife in urban areas, helping to reduce heat loss and reduction in energy use and can be visually attractive. Careful consideration will need to be given to ensure that such roofs, when added to existing buildings, are well integrated architecturally and cause no harm to the wider context.~~ Blue / green/brown roofs can be very efficient in slowing rainwater run-off, providing new habitats for wildlife in urban areas, helping to reduce heat loss and reduction in energy use and can be visually attractive. Careful consideration will need to be given to ensure that such roofs, when added to existing buildings, are carefully integrated both structurally and architecturally. PK suggestion add link to best practice
R23	73	4.107 EDIT BULLET POINT 2: The efficiency of building services (heating, lighting, hot water etc and appliances or electrical goods) and the use of low carbon energy sources (switching from gas to electricity) Fabric should be sufficiently energy efficient to support the installation of a low carbon heating system	Y	In what is now 4.117 Bullet 2 has been re-written: Equipment: ~~the efficiency of building services (heating, lighting, hot water etc and appliances or electrical goods~~. The efficiency of building services (heating, lighting, hot water etc and appliances or electrical goods) and the use of low carbon energy sources (switching from gas to electricity). Fabric should be sufficiently

				energy efficient to support the installation of a low carbon heating system.
R23	74	4.108 ADD TEXT: The council supports a fabric first approach to retrofit, and fabric should be sufficiently energy efficient to support the installation of a low carbon heating system	Y	The following has been added to start of what is now para 4.118 : The council supports a fabric first approach to retrofit, and fabric should be sufficiently energy efficient to support the installation of a low carbon heating system
R23	75	4.110 - REPHRASE PARAGRAPH: Externally applied insulation normally comprises an insulation layer with a weatherproof finish (render, brick slips, cladding panels). This approach is supported and should be done in a way that is sympathetic to the outward appearance of buildings. Care needs to be taken to avoid water ingress, and adequate ventilation of the property is important to avoid issues arising with condensation.	Y	What is now par 4.120 has been amended to read: 4.110 Externally applied insulation normally comprises an insulation layer with a weatherproof finish (render, brick slips, cladding panels). This approach is supported but needs very careful consideration ~~because it can have a significant impact on the outward appearance of buildings, obscuring architectural detailing to ill effect and as if not correctly installed, can create problems in its own right in relation to interior condensation and water ingress~~ and should be done in a way that is sympathetic to the outward appearance of buildings (including detailing and colour selection). Particular care needs to be taken to avoid water ingress, and adequate ventilation is essential to prevent condensation.
R23	76	Sustainability section from para 4.107 onwards See edits below: **Sustainability** 4.107 The Council supports efforts to reduce consumption and generate energy from sustainable sources. The three most important influences on a building's energy use in operation are: 1) Built fabric: the effectiveness of the building envelope in providing a suitable indoor environment (including heating and cooling, natural ventilation, and lighting). Fabric should be	Y	Whilst planning control does not extend to retrofit works within existing properties this information will be useful to property owners. The following edits have been made **Sustainability** 4.117 The Council supports efforts to reduce consumption and generate energy from sustainable sources. The three most important influences on a building's energy use in operation are: 1) Built fabric: the effectiveness of the building envelope in providing a suitable indoor environment (including h~~H~~eating and cooling, natural ventilation, and lighting ~~etc~~). Fabric should

		sufficiently energy efficient to support the installation of a low carbon heating system. 2) Equipment: the efficiency of building services (such as the heating, hot water, cooling, ventilation and lighting systems, and the cooking facilities, equipment, and lifts) and the use of low carbon energy sources (switching from gas to electricity). 3) People: how the building is occupied and used. **Built Fabric** 4.108 The council supports a fabric first approach to retrofit, and fabric should be sufficiently energy efficient to support the installation of a low carbon heating system. The built fabric of an existing building should be assessed to understand its thermal weaknesses. Upgrading can help performance and to reduce energy demand. Cavity wall insulation and internal insulation are strongly recommended although care must be taken to ensure buildings remain ventilated and that the insulation does not pose a risk of condensation. 4.109 When making changes to properties internally, consideration should be given to space heating. The removal of internal doors and walls to create open plan interiors makes it more difficult to heat spaces. Removing doors and walls to stairwells will allow heat to rise unimpeded. By contrast, traditional cellular rooms can be individually heated to suit each user's personal needs. **External Insulation** 4.110 Externally applied insulation normally comprises an insulation layer with a weatherproof finish (render, brick slips, cladding panels). This approach is supported and should be done in a way that is sympathetic to the outward appearance of the building. Care needs to be taken to avoid water ingress, and adequate ventilation of the property is important to avoid issues with condensation.		be sufficiently energy efficient to support the installation of a low carbon heating system. 2) Equipment: the efficiency of building services (such as the heating, hot water, cooling, ventilation and lighting systems, and the cooking facilities, equipment, and lifts) and the use of low carbon energy sources (switching from gas to electricity) ~~heating, lighting hot water etc and appliances or electrical goods.~~ 3) People: how the building is occupied and used. **Built Fabric** 4.118 The council supports a fabric first approach to retrofit, and fabric should be sufficiently energy efficient to support the installation of a low carbon heating system. The built fabric of an existing building should be assessed to understand its thermal weaknesses. Upgrading can help performance and to reduce energy demand. Cavity wall insulation and internal insulation are strongly recommended although care must be taken to ensure buildings remain ventilated and that the insulation does not pose a risk of condensation ~~etc~~. 4.119 When making changes to properties internally, consideration should be given to ~~the~~ space heating ~~etc~~. The removal of internal doors and walls to create open plan interiors makes it more difficult to heat spaces. Removing doors and walls to stairwells will allow heat to rise unimpeded. By contrast, traditional cellular rooms can be individually heated to suit each user's personal needs. **External Insulation** ~~Externally applied insulation normally comprises an insulation layer with a weatherproof finish (render, brick slips, cladding panels). This approach is supported but needs very careful consideration and should be done in a way that is sympathetic~~

		4.111 Where it is proposed, designers should take care to ensure that the design integrity of the building is retained and or improved. In most cases reproducing the colour palette, finishes and textures of the original architecture will generally be expected. Particular care must be taken with the treatments tall buildings given visual presence over their locality. New colours and treatments will generally be expected to reflect local distinctiveness (in accordance with Policy Q5) —buffs, creams and natural stone tones. See below. 4.112 The main technical challenge for the application of external wall insulation to existing buildings is the avoidance of thermal bridging which can cause internal condensation. To avoid thermal bridging around window and doors the insulation should be continued around into the window and door reveals. This will reduce window and door sizes and in some cases may necessitate door and window replacement. It is similarly important that the detailing around pipe penetrations and openings in the insulation are fully weather tight to avoid thermal bridging. Where penetrations are unavoidable (vent extracts / intakes and utility supplies), appropriate weather tight detailing is also essential. External wall fixtures (rain water goods and waste water pipes) and obstructions (such as boundary walls and lean-to outbuildings) abutting the external property wall will also present a cold bridging risk. Fixtures should be removed for the application of the insulation and re-attached. Obstructions should be removed also but if reinstated a gap should be retained between them and the insulation. 4.113 All external fixings (for rain water goods, satellite dishes, cables etc.) must be compatible with the insulation system and anchored firmly. If not, there is a high likelihood that the fixing will fail and the fixture will come loose (water ingress can result if rainwater goods are loosened and holes / damage to the insulation will harm its performance). To minimise the risk of		~~to the outward appearance of buildings (including detailing and colour selection). Particular care needs to be taken to avoid water ingress, and adequate ventilation is essential to prevent condensation.~~ 4.120 Externally applied insulation normally comprises an insulation layer with a weatherproof finish (render, brick slips, cladding panels). This approach is supported and should be done in a way that is sympathetic to the outward appearance of the building. Care needs to be taken to avoid water ingress, and adequate ventilation of the property is important to avoid issues with condensation. ~~But needs very careful consideration because it can have a signiciant impact on the outward appearance of buildings, obscure architectural detailing to ill effect, and if not correctly installed, can create problems in its own right in relation to interior condensation and water ingress~~ 4.121 Where it is proposed, designers should take care to ensure that the design integrity of the building is retained and or improved. In most cases reproducing the colour palette, finishes and textures of the original architecture will generally be expected. Particular care must be taken with the treatments tall buildings given visual presence over their locality. New colours and treatments will generally be expected to reflect local distinctiveness (in accordance with Policy Q5) —buffs, creams and natural stone tones. See below. 4.122 The main technical challenge for the application of external wall insulation to existing buildings is the avoidance of thermal bridging which can cause internal condensation. To avoid thermal bridging around window and doors the insulation should be continued around into the window and door reveals. This will reduce window and door sizes and in some cases may necessitate door and window replacement. It is similarly

		damage to the insulation by cables being snagged they should be tightly clipped at maximum 250mm intervals (horizontal runs) and 300mm (vertical runs). 4.114 To avoid water ingress property roofs should be extended to project beyond the face of the external insulation by a minimum of 35-40mm. Rain water gutters should be adjusted accordingly. 4.115 Given that the application of external insulation will naturally reduce the quantity of air infiltration into the property it is essential that adequate ventilation is provided to ensure that moisture laden air can leave the building; otherwise condensation, damp and mould growth will result. **Internal Wall Insulation (IWI)** IWI can be installed on most construction types provided the risks have been well understood and mitigated. Pre 1930s terraced houses are the most common building type in Lambeth, and these properties will have solid walls rather than cavity walls. The insulation of these buildings could apply external or internal wall insulation, but IWI has the added benefit of retaining the building's external aesthetics and appearance. Plus, other factors like statutory planning protection (i.e. listings, conservation areas, etc.) or technical limitations (such as geometry or excessive external services) may point to IWI as the preferable or even the only option. However, when internal insulation is applied, the hygrothermal characteristics of the building may change and moisture management is therefore a major consideration for the installation of internal wall insulation and systems. Please refer to the following best practice guide for retrofitting IWI which was published by the Department for Business, Energy and Industrial Strategy in 2021: https://assets.publishing.service.gov.uk/government/uploads/s		important that the detailing around pipe penetrations and openings in the insulation are fully weather tight to avoid thermal bridging. Where penetrations are unavoidable (vent extracts / intakes and utility supplies), appropriate weather tight detailing is also essential. External wall fixtures (rain water goods and waste water pipes) and obstructions (such as boundary walls and lean-to outbuildings) abutting the external property wall will also present a cold bridging risk. Fixtures should be removed for the application of the insulation and re-attached. Obstructions should be removed also but if reinstated a gap should be retained between them and the insulation. 4.123 All external fixings (for rain water goods, satellite dishes, cables etc.) must be compatible with the insulation system and anchored firmly. If not, there is a high likelihood that the fixing will fail and the fixture will come loose (water ingress can result if rainwater goods are loosened and holes / damage to the insulation will harm its performance). To minimise the risk of damage to the insulation by cables being snagged they should be tightly clipped at maximum 250mm intervals (horizontal runs) and 300mm (vertical runs). 4.124 To avoid water ingress property roofs should be extended to project beyond the face of the external insulation by a minimum of 35-40mm. Rain water gutters should be adjusted accordingly. 4.125 Given that the application of external insulation will naturally reduce the quantity of air infiltration into the property it is essential that adequate ventilation is provided to ensure that moisture laden air can leave the building; otherwise condensation, damp and mould growth will result. **Internal Wall Insulation (IWI)** <u>4.126 IWI can be installed on most construction types provided the risks have been well understood and mitigated. Pre 1930s terraced houses are the most common building type in</u>

		ystem/uploads/attachment_data/file/1019707/iwi-guidance.pdf **Cavity Wall Insulation** Cavity wall insulation is strongly promoted for every building that will allow. A survey or specialist advice may be required to determine whether a building is suitable for cavity wall insulation (generally buildings constructed before the 1930's have a solid wall so are not suitable). **Roof Insulation** Roof insulation is strongly promoted for every building. It can often be done with little intervention into the building fabric, for instance by laying insulating materials between the rafters in the roof space. Roof insulation may also be applied to the underside of the roof itself, but care should be taken to ensure that it will not trap or lead to the build-up of moisture. Further information on roof insulation may be found in detailed advice from Historic England: • https://historicengland.org.uk/images-books/publications/eehb-insulating-pitched-roofs-ceiling-level-cold-roofs/ • https://historicengland.org.uk/images-books/publications/eehb-insulating-pitched-roofs-rafter-level-warm-roofs/ • https://historicengland.org.uk/images-books/publications/eehb-insulating-flat-roofs/ **Underfloor Insulation** The type of floor insulation will depend on the construction of the building. Generally solid floors are trickier and less effective to insulate than suspended timber floors. For guidance on insulating floors, please refer to the following documents:		Lambeth, and these properties will have solid walls rather than cavity walls. The insulation of these buildings could apply external or internal wall insulation, but IWI has the added benefit of retaining the building's external aesthetics and appearance. Additionally, other factors like heritage designations or technical limitations (such as geometry or excessive external services) may point to IWI as the preferable or only option. When internal insulation is applied, the hygrothermal characteristics of the building may change and moisture management should be a major consideration for the installation. See best practice guide for retrofitting IWI by the Department for Business, Energy and Industrial Strategy in 2021: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019707/iwi-guidance.pdf **Cavity Wall Insulation** 4.127 Cavity wall insulation is strongly recommended for those buildings with cavity wall construction. A survey or specialist advice may be required to determine whether a building is suitable for cavity wall insulation (generally buildings constructed before the 1930's have a solid wall so are not suitable). **Roof Insulation** 4.128 Roof insulation is strongly promoted for every building. It can often be done with little intervention into the building fabric, for instance by laying insulating materials between the rafters in the roof space. Roof insulation may also be applied to the underside of the roof itself, but care should be taken to ensure that it will not trap or lead to the build-up of moisture. Further information on roof insulation may be found in detailed advice from Historic England:

		• https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/898872/suspended-timber-floors-underfloor-insulation-best-practice.pdf • https://historicengland.org.uk/images-books/publications/eehb-insulating-solid-ground-floors/ **Windows** Refer to 4.12 for guidance on window replacement. **Draught-proofing, secondary glazing and open chimneys** Draught-proofing around windows and doors is one of the most cost effective and least intrusive ways of improving the comfort of occupants and reducing energy used for heating with little or no change to a building's appearance. It also has the added benefit of helping to reduce noise and keeping out dust. The addition of curtains, blinds or shutters can also help significantly in decreasing heat loss through windows. Further information on draught-proofing may be found in detailed advice from Historic England: https://historicengland.org.uk/images-books/publications/eehb-draught-proofing-windows-doors Another effective means of cutting draughts and reducing heat loss through windows is by introducing secondary glazing. This is an independent window system which is installed to the room side of existing windows. The original windows remain in position in their unaltered form. Secondary glazing, which is available as openable, removable or fixed units, can usually be installed in listed buildings, subject to detail. In order to limit visual impact, any new secondary glazing should normally be set within the window reveal and any sub-divisions should respond to the glazing pattern of the adjacent window. Impact on existing historic shutters needs to be carefully considered.		• https://historicengland.org.uk/images-books/publications/eehb-insulating-pitched-roofs-ceiling-level-cold-roofs/ • https://historicengland.org.uk/images-books/publications/eehb-insulating-pitched-roofs-rafter-level-warm-roofs/ • https://historicengland.org.uk/images-books/publications/eehb-insulating-flat-roofs/ **Underfloor Insulation** 4.129 The type of floor insulation will depend on the construction of the building. Generally solid floors are trickier and less effective to insulate than suspended timber floors. For guidance on insulating floors, please refer to the following documents: • https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/898872/suspended-timber-floors-underfloor-insulation-best-practice.pdf • https://historicengland.org.uk/images-books/publications/eehb-insulating-solid-ground-floors/ **Windows** 4.130 Refer to 4.14 for guidance on window replacement. **Draught-proofing, secondary glazing and open chimneys** Draught-proofing around windows and doors is one of the most cost effective and least intrusive ways of improving the comfort of occupants and reducing energy used for heating with little or no change to a building's appearance. It also has the added benefit of helping to reduce noise and keeping out dust. The addition of heavy curtains, blinds or shutters can also help

		Open chimneys and flues can be useful sources of ventilation but they can often let too much warm air out and cold air in. The resultant draughts can create uncomfortable conditions. Whether used or unused, fireplaces and chimneys can have an important role in improving the energy efficiency of a building. Further information on energy efficiency of chimneys and flues may be found in detailed advice from Historic England: https://historicengland.org.uk/images-books/publications/eehb-open-fires-chimneys-flues **Thermal Bridging** Any form of insulation must be carefully designed in order to reduce or avoid thermal bridging. A thermal bridge occurs where there is a direct connection between the inside and outside through one or more building elements which are more thermally conductive than the rest of the building envelope, resulting in heat loss outwards, and a local internal surface which is cooler than other, better-insulated internal surfaces, which encourages condensation, and potentially the growth of mould. Thermal bridges can occur in areas such as floor/wall junctions and at door and window surrounds. In existing buildings there are relatively few opportunities to improve thermal bridging unless there is a significant revision to the construction detailing. Nonetheless, potential reductions in thermal bridging should be considered as part of the design strategy to avoid the risk of localised condensation, thermal discomfort or other issues. **Equipment** 4.116 Energy consumption can be significantly reduced by using efficient appliances and equipment. Designers should carry out an energy audit to identify current consumption; smart meters (gas, water, electricity) can assist with this. Measures to reduce energy consumption can include the installation of an air source heat pump or other low carbon heating source efficient		significantly in decreasing heat loss through windows. Further information on draught-proofing may be found in detailed advice from Historic England: https://historicengland.org.uk/images-books/publications/eehb-draught-proofing-windows-doors Another effective means of cutting draughts and reducing heat loss through windows is by introducing secondary glazing. This is an internal independent window system. The original windows remain in position in their unaltered form. Secondary glazing, which is available as openable, removable or fixed units, can usually be installed in listed buildings, subject to detail. In order to limit visual impact, any new secondary glazing should normally be set within the window reveal and any sub-divisions should respond to the glazing pattern of the adjacent window. Impact on existing historic shutters needs to be carefully considered. 4.132 Open chimneys and flues are a useful sources of passive ventilation but they can often let too much warm air out. Insulation can help but venting is essential. Whether used or unused, fireplaces and chimneys can have an important role in improving the energy efficiency of a building. Further information on energy efficiency of chimneys and flues is available from Historic England: https://historicengland.org.uk/images-books/publications/eehb-open-fires-chimneys-flues **Thermal Bridging** 4.133A thermal bridge occurs where there is a direct connection between the inside and outside through one or more building elements which are more thermally conductive than the rest of the building envelope, resulting in heat loss outwards, and a local internal surface which is cooler than other, better-insulated internal surfaces, which encourages

		appliances and using low energy lighting. Water efficient toilets, taps and shower heads can also significantly reduce water usage. When it comes to new boilers, care needs to be taken to ensure that flues are not on front or other visible elevations; Policy Q11 (a) (ii) needs to be considered. New systems need to be user friendly to be effective. **Replacing gas boilers** It will be necessary to eliminate the use of individual gas boilers for the Borough to reach net zero emissions. Current UK policy states that gas boilers will be banned from new homes by 2025, and no new gas boilers will be installed at all beyond 2035. The use of heat pumps, or a connection to a low carbon heat network are strongly encouraged. **Heat Pumps** The Government's Ten Point Plan for a Green Industrial Revolution (published in November 2020) has pledged 600,000 heat pump installations per year by 2028. Heat pumps are likely to form a major part of the borough's decarbonisation strategy. For planning guidance on air source heat pump installation, refer to the planning portal. In most instances, heat pumps will be able to be installed under permitted development. Further information on installation of heat pumps may be found in detailed advice from Historic England: https://historicengland.org.uk/images-books/publications/eehb-heat-pumps **Ventilation** Passive ventilation should be prioritised where feasible. However, the importance of ventilation in retrofitted buildings, particularly those with historic significance, cannot be over-stressed. Draughts can be reduced in traditional buildings but maintaining adequate ventilation is vital to ensuring that the building fabric remains in good condition, and for the mitigation of damp and mould.		condensation, and potentially the growth of mould. Thermal bridges can occur in areas such as floor/wall junctions and at door and window surrounds. Designers should consider potential reductions in thermal bridging as part of the design strategy to avoid the risk of localised condensation, thermal discomfort or other issues. **Equipment** 4.134 Energy consumption can be significantly reduced by using efficient appliances and equipment. Designers should carry out an energy audit to identify current consumption; smart meters (gas, water, electricity) can assist with this. Measures to reduce energy consumption can include the installation of an air source heat pump or other low carbon heating source ~~condensing boiler~~, efficient appliances and using low energy lighting. Water efficient toilets, taps and shower heads can also significantly reduce water usage. When it comes to new boilers, care needs to be taken to ensure that flues are not on front or other visible elevations; Policy Q11 (a) (ii) needs to be considered. New systems need to be user friendly to be effective. **Replacing gas boilers** 4.135 Current national policy states that gas boilers will be banned from new homes by 2025, and no new gas boilers will be installed at all beyond 2035. The use of heat pumps, or a connection to a low carbon heat network are strongly encouraged. **Heat Pumps** 4.136 The Government's Ten Point Plan for a Green Industrial Revolution (published in November 2020) has pledged 600,000 heat pump installations per year by 2028. Heat pumps are likely to form a major part of the borough's decarbonisation strategy.

		In some cases, mechanical ventilation will be required – mechanical ventilation with heat recovery (MVHR systems) are advisable in such cases. **Heating Controls** Including heating controls, such as a time programmer and weather compensation, will help to reduce heat energy use. When a heating system is replaced, heating controls should be incorporated regardless of whether they were originally included. **Smart Meters** It is recommended to introduce smart energy and water metering that will allow occupants to monitor their own consumption of energy and water. **People** 4.117 For all these measures to be effective, building occupiers must be aware of their own energy use and seek, where possible, to reduce it. Switching off lights, appliances and gadgets when not in use, adjusting thermostats, and wearing adequate clothing are simple measures that everyone can make. Drying clothes outside prevents problems of condensation internally and reduces energy consumption. Water butts reduce the need to use the mains water supply to water plants. The installation of smart energy systems and heating controls is a good way to monitor and reduce energy consumption. **Energy Generation** 4.118 Solar photovoltaic (PV) panels/ cells tend to be most efficient on unshaded south facing aspects, though are often viable on east and west aspects too. Whilst roofs are the most common location the facades of buildings can be used as well. The installation must respond well to the character of the host building and not detract from it. Given the scale of action needed to decarbonise Lambeth's building stock and tackle the climate emergency, the council strongly supports the widescale		For planning guidance on air source heat pump installation visit the planning portal. In many instances installation may be permitted development. Information on heat pump installation is available from Historic England: https://historicengland.org.uk/images-books/publications/eehb-heat-pumps **Ventilation** 4.137 The importance of ventilation in retrofitted buildings, particularly those with historic significance, cannot be over-stressed. Draughts can be reduced in traditional buildings but maintaining adequate ventilation is vital to ensuring that the building fabric remains in good condition, and for the mitigation of damp and mould. In some cases, mechanical ventilation will be required – mechanical ventilation with heat recovery (MVHR systems) are advisable in such cases. **Heating Controls** 4.138 Including heating controls, such as a time programmer and weather compensation, can help to reduce heat energy use. When a heating system is replaced the heating controls should be upgraded accordingly. **Smart Meters** Smart energy and water metering should be considered to allow occupants to monitor their own consumption of energy and water. **(para 4.139 - Water consumption section added in response to PPLF comment 10)** **People** 4.140 For all these measures to be effective, building occupiers must be aware of their own energy use and seek, where

		rollout of roof-top solar power. On non-designated heritage assets and buildings in conservation areas, panels should be designed sensitively with a view to the appearance of the building. Further information on installation of solar PV panels may be found in detailed advice from Historic England: https://historicengland.org.uk/images-books/publications/eehb-solar-electric 4.119 Wind turbines are not particularly efficient in urban areas and other options for generating renewable energy can be more effective. They are also normally visually prominent and vibration can make integration into existing buildings difficult. When considering a wind turbine, there is also a need to assess issues such as siting, structural loading, vibration, noise generation, height, prevalent wind direction and average speed, and proximity to trees and other buildings or structures. Noise and visual 'strobe' effect may be an amenity issue. Turbines are not normally considered appropriate on designated heritage assets or within conservation areas. 4.120 More detailed information is available in the Mayor of London's Sustainable Design and Construction SPG, (2014).Link: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planningguidance-and-practice-notes/sustainable-design-and For more information on energy efficiency for traditional buildings please see Historic England's extensive range of practical guidance documents. See link below: https:/historicengland.org.uk/advice/find/a-z-publications/#ptocE		possible, to reduce it. Switching off lights, appliances and gadgets when not in use, adjusting thermostats, and wearing adequate clothing ~~etc~~ are simple measures that everyone can make. Drying clothes outside prevents problems of condensation internally and reduces energy consumption. Water butts reduce the need to use the mains water supply to water plants. **Energy Generation** 4.142 Solar photovoltaic (PV) panels/ cells tend to be most efficient on unshaded south facing aspects, though are often viable on east and west aspects too. ~~For highest efficiency of photovoltaic PV cells and panelling fr solar water heating systems, an unshaded south facing aspect is required, although an unshaded southeast and southwest aspect can still be viable.~~ Whilst roofs are the most common location the facades of buildings can be used as well. The installation must respond well to the character of the host building and not detract from it. Given the scale of action needed to decarbonise Lambeth's building stock and tackle the climate emergency, the council strongly supports the widescale rollout of roof-top solar power. ~~On non-designated heritage assets and buildings in conservation areas,~~ ~~p~~Panels should be designed sensitively with a view to the appearance of the building. ~~Will generally only be supported if they can be located in places that are not readily visible~~ Further information is available from Historic England: https://historicengland.org.uk/images-books/publications/eehb-solar-electric 4.143 Wind turbines are not particularly efficient in urban areas and other options for generating renewable energy can be more effective. They are also normally visually prominent and vibration can make integration into existing buildings difficult. When considering a wind turbine, there is also a need to assess

				issues such as siting, structural loading, vibration, noise generation, height, prevalent wind direction and average speed, and proximity to trees and other buildings or structures. Noise and visual 'strobe' effect may be an amenity issue. Turbines are not normally considered appropriate on designated heritage assets or within conservation areas. 4.120 More detailed information is available in the Mayor of London's Sustainable Design and Construction SPG, (2014).Link: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planningguidance-and-practice-notes/sustainable-design-and For more information on energy efficiency for traditional buildings please see Historic England's extensive range of practical guidance documents. See link below: https:/historicengland.org.uk/advice/find/a-z-publications/#ptocE
R23	77	ADD TABLE SHOWING ART OF THE POSSIBE IN TERMS OR RETROFIT.- NON-CONSERVATION AREA, CONSERVATION AREA, LISTED BUILDING - WHAT IS POSSIBLE + PROCESS. SEE PAGE 56: https://planningconsult.rbkc.gov.uk/gf2.ti/-/1235874/89745189.1/PDF/-/21-01-12%20Draft%20Geening%20SPD%20_accessible_.pdf	Y	Accepted. The Table has been added to Part 3 of the SPD
R23	78	Para 4.123 REWRITE TO: The council does not support the creation of additional vehicular crossovers, and the creation of new private parking spaces. Measures that support increased car usage are counterproductive to wider efforts to improve air	Y	The suggested approach to parking is not in line planning policy P6. Furthermore, the highways regulations are written in such a way that the transport team can't refuse crossovers if they are safe from a highways point of view.

		quality, tackle the climate emergency, and make Lambeth's streets safer and more inclusive.		What is now Para 4.146 has been edited to read: The creation of additional vehicular crossovers results in the loss of an on-street parking bay which is facility to the whole community. The loss of ~~all or the majority~~ of on-street parking bays removes parked cars from the road and the resulting open carriageway allows motorists to drive faster <u>which presents a threat to other road users, especially pedestrians and cyclists</u>. ~~The Council wishes to resist this from happening across the borough through the application.~~
PPLF	9	Retrofitting has a positive effect on fuel poverty. Can this be mentioned?		The text has been amended to read 4.117 The Council supports efforts to reduce consumption and generate energy from sustainable sources. This has clear environmental benefits <u>and is a key means of addressing fuel poverty in Lambeth</u>
PPLF	10	More could be said in the guidance about water consumption /usage		Para 2.92 bullet 6 already touches on this. However, a new para has been added after 4.138 <u>Water Consumption</u> <u>Retrofitting and service upgrading works should seek to minimise water usage. This is best achieved by incorporating water efficient toilet cisterns, appliances and systems. Simple features such as low-flow showers and rainwater harvesting measures such as the use of water butts are strongly encouraged. See Local Plan Policy EN6 and London Plan policy SI5.</u>

PART 5 DESIGN ADVICE FOR BASEMENTS

Respondent no.	Comment no	Comment	Accepted Y or N?	Response
R6	2	**Basements and flood risk** (5.26) We support the inclusion of basement development and the links to the emerging local plan policies on flood risk. We support the reference made to avoiding self-contained basements in areas at high risk of flooding. We would suggest that you could refer to basement bedrooms in this section to ensure that access levels are raised above the Thames Tidal Breach flood level.	Y	Accepted. Para 5.26 amended. 5.26 <u>In terms of basement level accommodation and</u> ~~i~~<u>in</u> line with Policy EN5 and Annex 5 (flood Risk Zones) of the Lambeth Local Plan,the Council will not support self-contained residential units, bedrooms, or non residential uses in areas with a high probability of flooding…… accommodation to allow for an escape route to a floor above the flood level.'
R7	4	Thames Water support the references to Policy Q27 within Section 5 and in particular the text at paragraph 5.54 which makes reference to the need for development to be protected from sewer flooding through the incorporation of a positive pumped device.	N	Noted
R8	36	We welcome that this topic now has its own policy (Q27), but that already seems sufficiently detailed that further amplification in an SPD should not be necessary.	N	Noted
R8	37	**Open areas and light wells:** In Q27 para e(iv), the use of open basement areas with railings or balustrades is to be preferred for Victorian properties, as this approach lends itself to the replication of original design features. Horizontal grilles are more appropriate where there is little or no forecourt, or pedestrian access is required above the light well.	N	No change. The SPD cannot change local plan policy wording.

R10	5	LHG would like to reiterate comments made within the representations submitted on the Draft Revised Local Plan Review in respect of the draft basement development (Policy Q27). It is recognised that there is a growing demand for basement development across London due to high levels of development pressure and high land values which has given rise to an increasing level of below ground development.	N	Noted
R10	6	LHG have raised concerns regarding the onerous restrictions that are being applied through the wording of Policy Q27 to non-residential basement extensions. Basement development can assist in some cases with meeting the need for additional floorspace as part of existing building which may have other site constraints above ground level which would otherwise prevent upward extensions to existing properties.	N	No change. The SPD cannot change local plan policy wording.
R10	7	Basement development therefore helps to meet the needs of the Borough. In particular, it assists in: • The provision of additional floorspace (such as leisure space and habitable space where possible), which may not have been achievable above ground; • The provision of much needed parking; • The provision of space for plant machinery, as opposed to locating them outdoors where they have potential to cause noise disturbance; • The ability to provide lateral spaces, particularly within listed buildings where it is difficult to provide these due to constraints on changes to plan form.	N	Noted
R10	8	It is important to note that the supporting text to Policy D10 of the emerging Draft London Plan seeks to restrict basement	N	No change. The SPD cannot change local plan policy wording.

		development 'where this type of development is likely to cause unacceptable harm'. The supporting text goes on to recommend that local authorities should consider, inter alia, any cumulative impacts, local ground conditions, flood risk, drainage impacts, land stability, landscaping, noise and vibration. Policy D10 does not support or recommend blanket restrictions on basement development.		
R10	9	A blanket approach preventing additional basement storeys below one storey or below existing basements is therefore inconsistent with the approach recommended through the emerging Draft London Plan.	N	No change. The SPD cannot change local plan policy wording.
R10	10	It is noted that the Council's evidence base to support Policy Q27 has been guided by the Lambeth Residential Basement Study (April 2016) which relates to **residential basements** rather than commercial basements and it is not clear what evidence the Council have to support this blanket approach to all basement development in the Borough.	N	No change. Para. 5.28 states 'For non-residential development Policy Q27 (f) acknowledges that in major developments it may be acceptable to have more than one non-residential basement levels of more than one storey in height where applicants can robustly demonstrate that there would be no significant impacts will result. In assessing these cases designers should show that matters of hydrology or the land stability of neighbouring buildings, trees and other structures, have all been fully assessed.'
R10	10	It is considered that basement proposals, particularly for non-residential uses, should be considered on a site by site basis in light of the local context and other relevant site constraints. The acceptability of a basement proposal should be assessed against supporting documentation which considers the potential impacts of the proposal, i.e. the criteria listed in the supporting text to Draft London Plan Policy D10 as well as the considerations set out in in Part a) of Policy Q27.	N	No change. The SPD cannot change local plan policy wording.

R10	11	Additionally, there will be cases within the Borough where a basement to the front and / or side of a site has the potential to include accommodation (rather than just serve to provide outlook and daylight). These cases may be relevant where a basement extension is not possible to the rear of a site. LBL has not provided any evidence to justify why it is necessary to restrict basement development to the front and side of properties.	N	No change. The SPD cannot change local plan policy wording.
R10	12	LHG are supportive of the flexibility for new build schemes to include a non-residential basement greater than one storey albeit the statement that the proposals would need to robustly demonstrate that 'no unacceptable impacts will result' is onerous and not justified and this should therefore be reviewed through the Design Code SPD.	N	Noted
R10	13	The Design Code SPD does acknowledge that due consideration needs to be paid to the potential impacts of basements from a geological, hydrological and hydrogeological perspective. Notwithstanding the concerns raised above in connection with Policy Q27, LHG supports the requirements for basement proposals to be assessed through a basement impact assessment including details relating to surface water flow, flooding, subterranean groundwater flow, ground and structural movement, cumulative effects (including impacts on neighbouring properties), construction management and ground stability. Through the submission of a basement impact assessment in support of a planning application, LBL will have the opportunity to fully understand and assess the proposals including any potential impacts through independent verification. This approach is acceptable to the extent that each case will therefore be considered on its own merits and the	N	Noted. These matters are covered in the evidence base to Local Plan Policy Q27.

		onus will be upon the applicant to demonstrate appropriate development.		
R10	14	In light of this and the separate representations submitted by LHG on the Draft Revised Lambeth Local Plan Policies, it is requested that the Design Code be re-worded to provide flexibility that basement development be assessed on a site by site basis rather than blanket restrictions.	N	The guidance reflects the final version of the policy
R13	4	Part 5 of the SPD contains a design topic on Basements which is intended primarily for applicants proposing a basement extension to an existing residential property but is also relevant for a range of sites that propose below ground excavation to create floor space. This design topic is supported by Policy Q27 of the Draft Reviewed Lambeth Local Plan (2020) which seeks to minimise unacceptable impacts, set parameters and request Basement Impact Assessments. The Trust supports this guidance with particular reference to Policy Q27(f) that acknowledges that in non-residential major developments it may be acceptable to have more than one basement level of more than one storey in height. This is of particular relevance to the Trust, given the significant basements that are held in strategic healthcare sites such as St Thomas' Hospital. The basement floor space is a highly utilised space at the hospital which has many uses including, clinical and ancillary uses. With this in mind, it is important that the Trust is not unduly restricted from using or altering its existing basements. We would like to express support for the continuation of flexibility in the application of the basement design part of the SPD to non-residential basement floor space and its acceptable uses.	N	Noted. These matters are best considered at application stage.
R15	45	'Stages diagram' on page 9 – content under "Planning application" heading needs to be swapped with content under "Construction"	Y	Accepted. Error – amend basement neighbour checklist diagram to swap content under

				'Planning Application' with context under 'Construction' stage
R15	46	Paragraph 5.143 – remove "Construction Management Plan" heading	Y	Para 5.143 – "Construction Management Plan" heading removed ~~Construction Management Plan~~
R15	47	Paragraph 5.35 – in terms of new dwellings on small sites it might be useful to flag the amenity considerations. Perhaps something along the lines of: *"in order for spaces within basement areas and lightwells to be counted towards amenity space requirements they must be genuinely usable and meet the needs of occupants'*.	Y	Accepted. Reference added to para 5.35 to refer to amenity space para 2.55-2.56. '5.35 Whilst basement level courtyard gardens can provide adequate outlook for bedrooms they rarely gain sufficient sunlight to count as usable outdoor amenity space. For living rooms and kitchens consideration should be given to grading the ground outside so that there is better outlook then might be provided by a conventional light-well. Where possible light-wells should be stepped and planted with trailing plants and / or have light reflective finishes such as glazed bricks. <u>Design considerations for all private amenity space are outlined in paragraphs 2.55 and 2.56'</u>
R15	48	The document largely focuses on residential basements. Additional content on non-residential basements would be useful.	Y	Accepted. Added new para. 5.55 <u>'5.55 effect of plant and servicing is particular important on non-residential basements and matters ventilation and means of escape need very careful consideration both in terms of functionality and neighbour amenity.'</u>
R22	33	5.89 It is likely the web page will change location in the near future, would it be useful to just use lambeth.gov.uk for continuity?	Y	Reference link amended.
R22	34	5.90 Sustainable Drainage Systems and Water Management If the below text replaces SuDS in part 2, and you'd prefer the document didn't duplicate work this could be condensed down to say,	Y	Accepted. Para 5.90 amended. We have moved Para 5.90 – 5.93 from Basement Part 5 to Part 2 Design Advice for all Development

		"As stated in Design Code Part 2: Design Advice for all development, all below ground or basement development are still required to manage surface water runoff in accordance with: - National Planning Policy Framework (Paragraphs 163 and 165) - ..... A surface water management strategy will be required to ensure the design is compliant with the aforementioned, and can form part of a BIA or FRA, or as a standalone document. 5.90 Bullet 1 add Paragraphs 163 and 165		Para 2.67 and cross referenced section on Sustainable Drainage Systems and Water Management in Basement Part 5 to Part 2 Design Advice for all Development Para 2.67 5.90 ~~All development sites that result in the increase of impermeable surface area are required to mitigate the resulting increase of surface water runoff rate and volume. All major planning applications will require a site specific Drainage Strategy that forms part of or is separate to a Flood Risk Assessment to detail how the site will manage surface water runoff and meet the requirements/standards set out in:~~ As stated in paragraph 2.67 all below ground or basement development are still required to manage surface water runoff in accordance with: • National Planning Policy Framework; • Non-statutory Technical Standards for Sustainable Drainage Systems; • London Plan (Policy 5.13); and A surface water management strategy will be required to ensure the design is compliant with the aforementioned, and can form part of a BIA or FRA, or as a standalone document.
PPLF	11	Richmond Council has a specific requirement for inclusion of a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together		Such an approach would not accord with Policy Q27 G (ii) which states:

		with a minimum 200mm drainage layer. Is there scope to add something similar?		*'ii. has a roof treatment level with ground level which allows it to continue to provide amenity space for the host building'* The Lambeth approach in (ii) is in part to minimise the amount excavation and thus reduce construction periods etc. However, it should be noted the same policy also (i) restricts full basements to the rear and (iv) generally requires that 70% of the garden area is free from subterranean development. Therefore, there will be plenty of earth/ ground remaining on properties for plants to flourish and to allow for natural drainage.

END